HUMAN CAPITAL



The Medium-Term Plan for Human Resources (HR) has a major objective, namely that the Company is able to attract and retain the best Indonesian talent who have superior capabilities with a high level of productivity to achieve the Company's strategic goals and business targets.



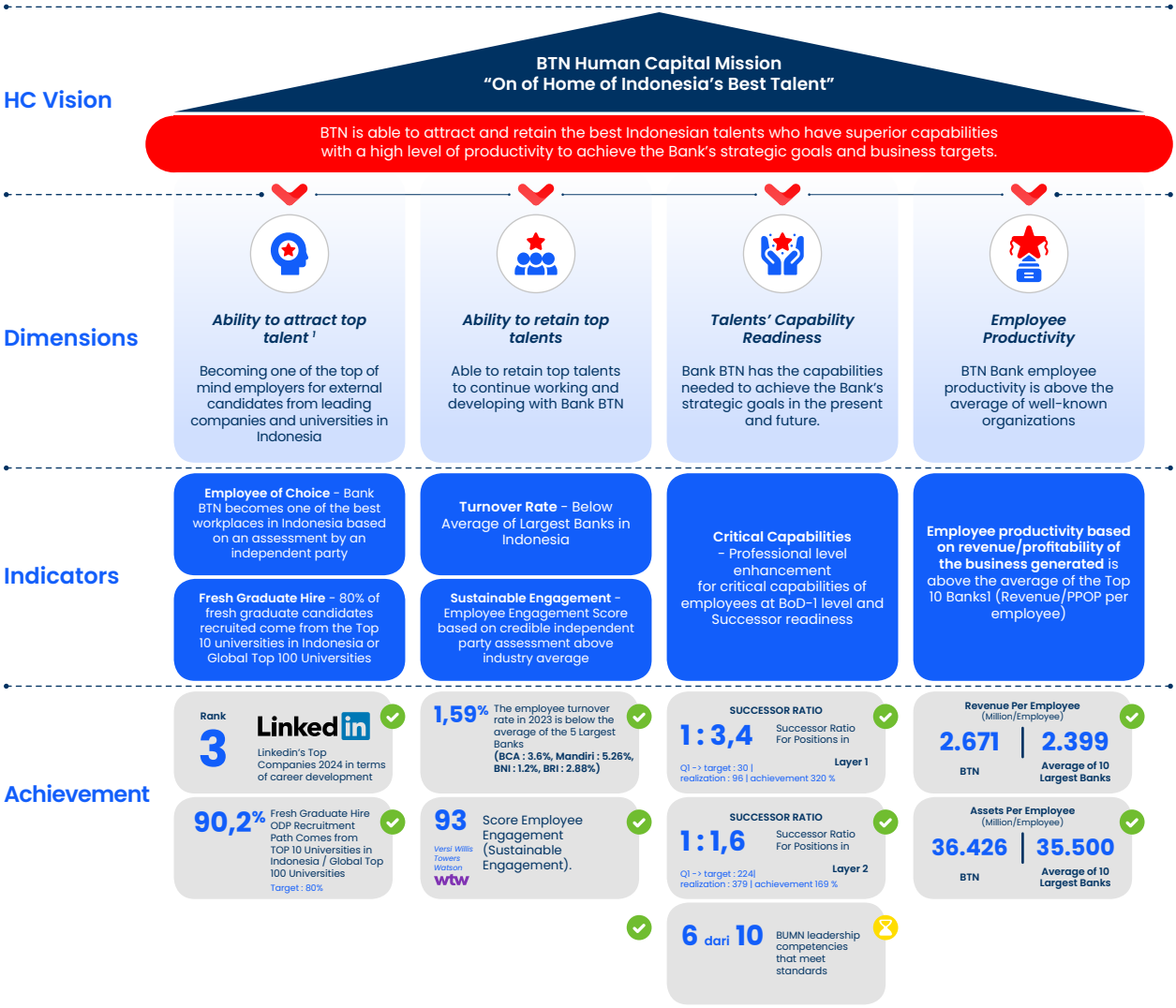
Human Capital Management Strategy

In order to realize "One of Homes of Indonesia's Best Talent", the Human Resources (HR) development work program in the short and medium term has been aligned with the 2021-2025 Corporate Plan. The Medium Term Plan for Human Resources (HR) has a big goal, namely that Bank BTN is able to attract and retain the best Indonesian talent who have superior capabilities with a high level of productivity to achieve the Company's strategic goals and business targets.

In order to realize the End-state Human Capital of BTN, 4 (four) pillars of Endstate dimensions have been formulated which are the parameters for the success of achieving the condition of "Becoming a home for the best talents of Indonesia". Up to 2024, the indicators and achievements of each pillar were as follows:

1. Ability to Attract Top Talent
   - Dimension: BTN becomes one of the top-of-mind employers for external candidates from leading companies and universities in Indonesia.
   - Indicators:
     a. Employer of Choice: BTN becomes one of the best workplaces in Indonesia based on an independent assessment.
     b. Fresh Graduate Hire: 80% of fresh graduate candidates recruited come from the top 10 universities in Indonesia or the global top 100 universities.
   - Achievements for each indicator are as follows:
     a. Employer of choice: Ranked 3rd in LinkedIn's Top Companies for career development.
     b. Fresh Graduate Hire: 89% of fresh graduates are recruited through the ODP recruitment from the top 10 universities in Indonesia or the top 100 universities globally.
2. Ability to Retain Top Talents
   - Dimension: Ability to retain top talents to continue working and growing with BTN.
   - Indicators:
     a. Turnover Rate: Below the average of leading banks in Indonesia.
     b. Sustainable Engagement: Employee engagement survey score reflecting employee satisfaction and loyalty to BTN.
   - Achievements for each indicator are as follows:
     a. Turnover Rate: 1.59%, lower than the banking industry average.
     b. Sustainable Engagement: Score of 93 from an independent survey.
3. Talents' Capability Readiness
   - Dimension: BTN possesses strategic capabilities to support the achievement of business targets in the present and future.
   - Indicator: Critical Capability – Percentage of talents with critical capabilities based on BTN's needs.
   - Pencapaian: Kapabilitas Kritikal: 1:3 successor ratio for positions at BOD-1 level.
4. Employee Productivity
   - Dimension: BTN employee productivity is above the average of similar companies.
   - Indicators:
     a. Employee productivity based on operational revenue (Revenue/Employee).
     b. Employee productivity based on assets per employee (Assets/Employee).
   - Achievements:
     a. Productivity (Revenue/Employee): IDR 2.671 billion/employee.
     b. Productivity (Assets/Employee): IDR 36.426 billion/employee.

Below is the illustration of the Human Capital (HC) roadmap for 2022–2025:



To achieve the end-state dimension parameters, three (3) Strategies and fourteen (14) Strategic Initiatives have been developed as follows:

1. Becoming the preferred workplace for top talent through improvements in recruitment and onboarding processes that enhance employee experience, a motivational and competitive reward system in the market, and the activation of the Company's Employee Value Proposition.
2. Strengthening employee capability, productivity, and competitiveness through improvements in employee capability enhancement programs, interventions to support a learning culture, consistent coaching implementation, and the application of productivity metrics in workforce planning and performance management.
3. Focusing on value creation and becoming a Business Partner through organizational alignment to promote the business partner function, Digital HR implementation to support operational excellence and decision-making, and Corporate Culture Internalization implementation

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Human Capital Management Policy and Implementation

Recruitment

Policy

Bank BTN has various recruitment channels that provide opportunities for various levels of society to join Bank BTN. Provisions regarding recruitment are regulated in Special Policy No. KK3.A dated October 31, 2023 concerning the Human Capital Cycle, and in detail in Technical Instructions No. 3-A.11, concerning Recruitment and Selection. Employee recruitment in 2024 was carried out through various external and internal recruitment channels to ensure that employees in work units are fulfilled according to the number and capability requirements. Recruitment implementation at the Company has implemented gender equality and opportunities for people with disabilities.

The principles of employee recruitment based on KK.3.A include:

1. 1Based on Employee Needs Planning, covering job types and requirements, the number of employees needed, and/or future capability needs.
2. Fulfilling employee needs from both external and internal sources of the Bank is based on the determination of work unit formations through Workload Analysis.
3. Employee acquisition will be carried out if the analysis results indicate a gap (deficit) between the calculated employee needs and the current number of employees in a unit.
4. In addition to fulfilling Employee Needs calculations, Employee Acquisition may also be conducted when there is a vacant position that must be filled immediately. This recruitment can be done both internally and externally, aligning with the requirements of the designated job profile.
5. Employee acquisition primarily focuses on fulfilling workforce needs from within (Promotion and Rotation), without ruling out the possibility of external recruitment if internal fulfillment is insufficient or inadequate.

Job Posting may be conducted using several methods, including but not limited to:

1. Internal Job Posting
2. Open Recruitment
3. Collaboration with headhunters
4. Collaboration with educational institutions
5. Campus Hiring

According to the Technical Guidelines No. 3-A.11 on Recruitment and Selection, regulations also cover Disability Recruitment, specifying the types of disabilities that meet the criteria for candidates. Currently, the eligible disabilities include Mild Physical Disabilities and Speech Disabilities. However, other disability categories may be considered in future recruitment while preparing proper accommodations and accessible facilities for employees with disabilities.

Recruitment Implementation

Throughout 2024, a total of 1,227 employees have been recruited through various recruitment channels. One of these channels includes recruitment for individuals with disabilities. This program is also an initiative from the Ministry of State-Owned Enterprises (BUMN) through the Forum Human Capital Indonesia (FHCI), where the Company has recruited 16 individuals with disabilities in 2024. During the recruitment process, the Company does not discriminate based on gender or race, and all candidates are treated equally. The Company consistently applies the principles of Diversity, Equity, and Inclusion (DEI) as part of its commitment to sustainability principles in accordance with the Company's ESG Roadmap..

As part of the 2024 recruitment activities, the Company has recruited 1,227 employees through various recruitment pathways, including:

a. Talent Scouting, Career Days, and Inspire Corner at leading universities in Indonesia.
b. Recruitment of 16 employees with disabilities.
c. Special recruitment for the Regional Leader Development Program (RLDP) with 19 employees.
d. Bakti Diaspora 2024 recruitment in New York and Vancouver.
e. Implementation of Inspire Corner in Brisbane, Australia, for diaspora talent.

Table of Recruitment Implementation for 2024

No.	Recruitment Pathway	Number
1.	Frontliner	312
	a. Customer Service Staff	148
	b. Teller Service Staff	164
2.	General Banking Staff	622
3.	Secretary	13
4.	Officer Development Program	243
5.	Experienced/ Pro-Hire Hiring	37
Total		**1.227**

Competency Development

Policy

Developing hard skill and soft skill competencies becomes part of the Human Capital cycle guidelines in managing Human Resources in accordance with Special Policy No. KK.3-A, concerning the Human Capital Cycle. Every employee is obliged to develop their competencies so they can do their job well, and prepare themselves to be able to face change and/or occupy a higher position.

Employee competency development is carried out through structured and systematic learning and development programs to enhance the required knowledge, skills, and attitudes. The learning and development framework is designed using the Analysis, Design, Development, Implementation, Evaluation (ADDIE) approach and applies the 10:20:70 learning model, consisting of:

1. 10% through formal learning.
2. 20% through learning from others.
3. 70% through learning by doing.

The Principle of Equality is applied, ensuring that all employees have equal opportunities for learning and development, from the initial placement phase to being projected into higher positions. The employee competency development cycle includes:

1. Onboarding – The preparation process for employees in new positions, either through internal movement (rotation, promotion, transfer) or for new employees.
2. Equipping – The process of enhancing or refreshing the competencies of employees in their current positions.
3. Developing – A comprehensive competency development process for employees projected for higher positions.

This program aims to ensure sustainable human resource management, responsiveness to change, and alignment with business needs and organizational vision. Employee competency development focuses on leadership, critical capabilities, funding, transactional, and digital banking.

Implementation of Competency Development

The Company conducts learning and development programs to continuously meet competency requirements, aligned with the annual business strategy focus through training, development, special assignments, as well as transfer and promotion programs.

The Company is committed to ensuring that all employees have equal opportunities for growth, regardless of job level or gender. The learning and development process is designed to provide equal opportunities for all employees, whether in managerial or non-managerial positions.

Additionally, the Company promotes gender equality by ensuring that both men and women have the same access to career development through learning and development programs that support their professional growth. Through this approach, the Company fosters an inclusive work environment, offering equal opportunities for all employees to develop their competencies.

Competency Development in 2024

Below is the table of competency development distribution by job level and gender for the period January – December 2024:

Table of Competency Development in 2024

No.	Job Level	Employees		Total Employees	Training Field	Employee Training	
		Male	Female			Male	Female
1	EXECUTIVE VICE PRESIDENT	2	1	3	Leadership	2	1
					Operational Banking	2	1
2	SENIOR VICE PRESIDENT	27	3	30	Business & Sharia Banking	2	-
					Leadership	23	3
					Operational Banking	26	3
					Sales & Service	2	2
3	VICE PRESIDENT	87	23	110	Business & Sharia Banking	5	3
					Credit & Risk	12	2
					Leadership	50	17
					Operational Banking	83	21
					Sales & Service	10	3
4	ASSISTANT VICE PRESIDENT	122	22	144	Business & Sharia Banking	9	1
					Credit & Risk	33	3
					Leadership	41	18
					Operational Banking	121	22
					Sales & Service	5	5
5	SENIOR MANAGER	166	51	217	Business & Sharia Banking	23	5
					Credit & Risk	36	17
					Leadership	52	32
					Operational Banking	166	51
					Sales & Service	16	10
6	MANAGER	831	336	1.167	Business & Sharia Banking	110	28
					Credit & Risk	281	121
					Leadership	143	75
					Operational Banking	831	333
					Sales & Service	102	113
7	ASSISTANT MANAGER	1.718	1.215	2.933	Business & Sharia Banking	230	125
					Credit & Risk	684	437
					Leadership	93	141
					Operational Banking	1.707	1.207
					Sales & Service	303	223

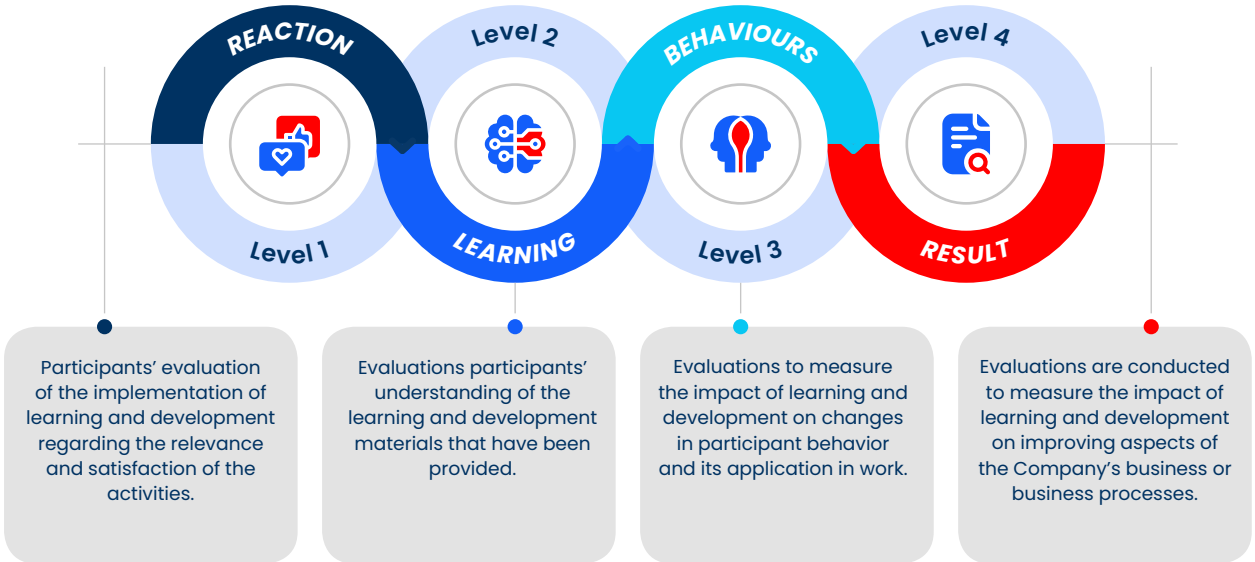
No.	Job Level	Employees		Total Employees	Training Field	Employee Training	
		Male	Female			Male	Female
8	SENIOR STAFF	2.594	3.065	5.659	Business & Sharia Banking	368	366
					Credit & Risk	989	1.006
					Leadership	241	170
					Operational Banking	2.594	3.065
					Sales & Service	463	1.024
9	STAFF	1.013	1.571	2.584	Business & Sharia Banking	118	158
					Credit & Risk	248	257
					Leadership	-	20
					Operational Banking	974	1.476
					Sales & Service	248	490
Total		**6.560**	**6.287**	**12.847**			

Various employee development programs have been implemented across five training areas with the following objectives:

Training Field	Training Objectives
Business & Sharia Banking	Enhancing employee competencies in sales, marketing, general knowledge, and other aspects within the Sharia Banking sector.
Credit & Risk	Improving expertise in credit and credit risk management.
Leadership	Developing leadership skills and career advancement opportunities for employees.
Operational Banking	Strengthening employee competencies in the Company's operational activities.
Sales & Service	Enhancing skills in sales and customer service.

Evaluation of Competency Development Implementation

To assess the effectiveness of competency development programs, the Company applies a systematic and comprehensive evaluation approach using the Kirkpatrick method, which consists of four levels of evaluation:



Competency Development Costs

In its implementation, the Company systematically allocates a budget for employee learning and development, referring to regulations governing human resource competency development. The funds are allocated for employee learning and development activities in technical, non-technical, and leadership fields. The total budget allocation for competency development in 2024 increased by 10.01% compared to 2023.

Competency Development Costs (in IDR millions)		Growth	
2024	2023	In local currency (in IDR millions)	In Percentage (%)
105.530	95.928	9.602	10,01%

Career Development

Policy

As part of a sustainable human resource strategy, BTN has implemented a new grading system based on the Global Grading System to support BTN's competitive positioning in the banking industry. This system ensures that each employee has a progressive career path aligned with global standards. Adjustments to the grading system are necessary due to organizational growth, business scale expansion, and operational model changes. Below is BTN's grading system:

Band	Grade	Corporate Title
	6A	Senior Executive Vice President
5	5B	Executive Vice President
4	4E/5A	Senior Vice President
4	4D	Vice President
4	4C	Vice President
4	4B	Assistant Vice President
4	3E/4A	Senior Manager
3	3D	Manager
3	3C	Manager
3	3B	Assistant Manager
3	3A	Assistant Manager
2	2F	Senior Staff
2	2E	Senior Staff
2	2D	Staff
2	2C	Staff
2	2B	Junior Staff
2	2A	Junior Staff

The Global Grading System encourages employees to enhance their technical, behavioral, and leadership competencies according to their level. Specifically, positions like Deputy Division Head (4E) and Division Head (5A) now have clearer competency definitions, particularly in leadership and people management. A key policy within this system is that cross-band grade gaps are not permitted, ensuring structured career progression and helping employees prepare for greater responsibilities.

Following the post-implementation of the new grading system, three key positive impacts have been observed: Job grading adjustments to align with function and responsibilities, Reduction in grading gaps, leading to a more structured career path, and Improved labor cost efficiency.

TALENT MAPPING

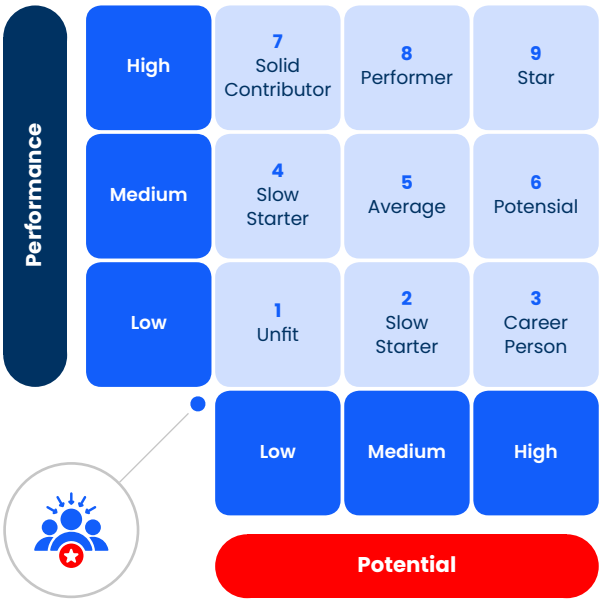
Career development at BTN refers to the provisions of Special Policy No. KK.3-A on the Human Capital Cycle. In general, the career patterns regulated by the Company for all employees include the acceleration track, fast track, middle track, normal track, moderate track, and slow track. As the basis for employee career management, talent mapping is carried out by grouping employees based on their potential.

Employee talent mapping consists of performance and potential aspects. Each aspect is categorized into three criteria: low, medium, and high.

The performance aspect is based on the results of the Individual Performance Evaluation (IPE) over the last three years when the Talent Mapping assessment is conducted.

2. The potential aspect is measured based on two factors:
   - Cognitive Assessment (Learning Agility), weighted at 20%
   - Behavioral Competency Assessment, weighted at 80%

Based on these criteria, employees will be mapped into a 9-box matrix as follows:



Here are the nine (9) types of talent:

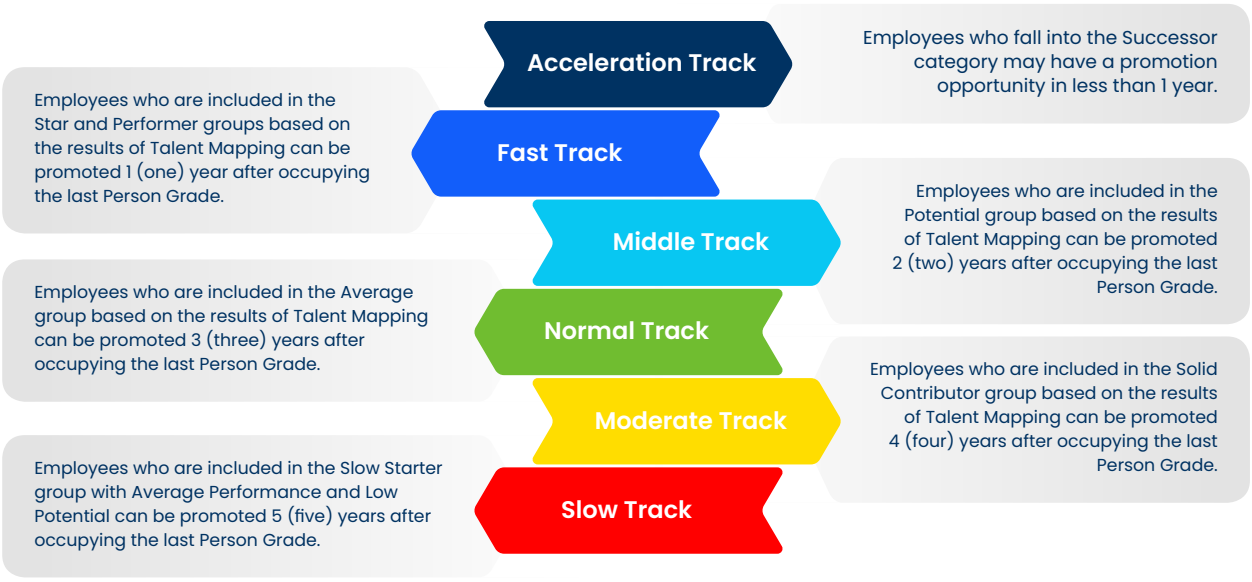
1. Star: Employees with High Performance and High Potential.
2. Performer: Employees with High Performance and Medium Potential.
3. Solid Contributor: Employees with High Performance and Low Potential.
4. Potential: Employees with Medium Performance and High Potential.
5. Average: Employees with Medium Performance and Medium Potential.
6. Slow Starter: Employees with Medium Performance and Low Potential.
7. Career Person: Employees with Low Performance and High Potential.
8. Slow Starter: Employees with Low Performance and Medium Potential.
9. Unfit: Employees with Low Performance and Low Potential.

Career advancement is categorized into two (2) levels based on the employee band:

1. Employees with a person grade band of 2
   - Employees may be given a promotion opportunity if they have accumulated a minimum score of 10 in their last person grade.
   - The score determination will be based on the results of the Individual Performance Evaluation, following these rules.

Individual Performance Evaluation	Score
Performance Rating 1	5
Performance Rating 2	4
Performance Rating 3	3
Performance Rating 4	2
Performance Rating 5	1

2. Employees with a person grade band of 3 and above
   - Career opportunities will be determined based on talent mapping results, which are categorized into six (6) career paths as follows:

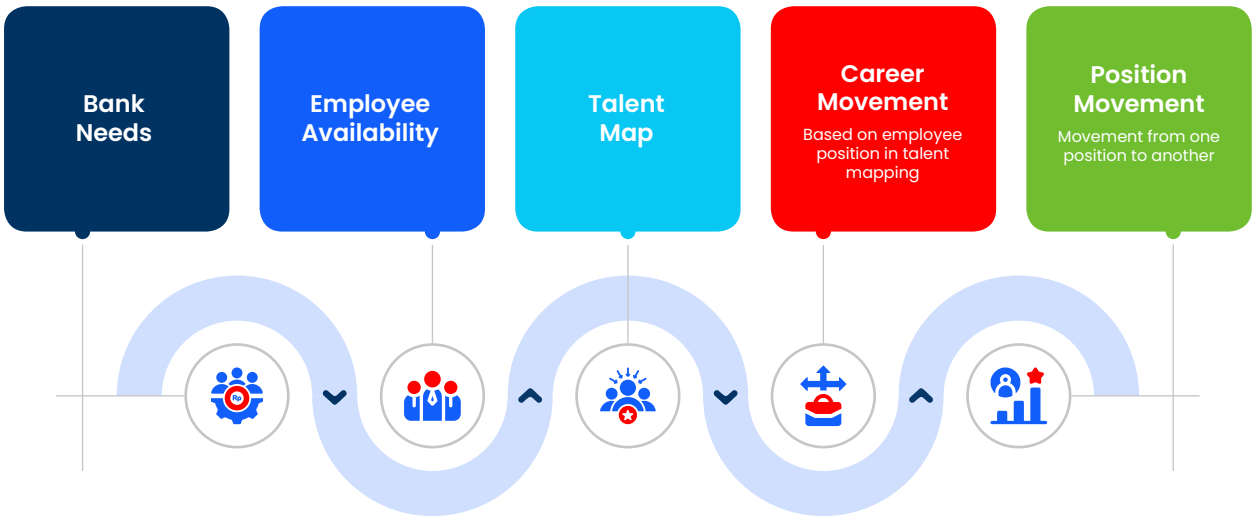


To ensure transparency, motivation, and positive competition, BTN has established two official career advancement periods per year:

1. Period I: early year
2. Period II: mid year

Note: Career advancement outside the designated period may be possible based on certain considerations and the Company's needs.

Company's career development concept is tailored to the Company's needs, employee availability, potential mapping from talent mapping, career movement patterns based on job risk, and job transitions. This ensures that employee career development aligns with business needs and the requirements for organizational transformation or change.



To ensure the availability of successors, career development programs are implemented for various job levels. These programs follow steps starting from candidate identification and selection to talent panel discussions for determining career movements or candidate positioning based on program outcomes. The types of career development initiatives for employees include leadership education, immersion programs, coaching and mentoring, setting specific targets, project assignments, technical education, mandatory certifications, teaching assignments or training facilitation, and certification programs. Additionally, employees undergo executive coaching, rotation/replacement, company benchmarking, participation in professional banking associations, seminars/conferences, and ad-hoc team assignments to enhance their exposure, experience, and professional network.

Career Development Implementation

To support employee career development, the company conducts employee assessments. The assessment implementation for 2024 is as follows:

2024 Assessment Details

No.	Description	Participants
1.	Assessment Grade 8 – 13 (ASTONIA)*	5.045
2.	Assessment Grade > 13 Using External Consultant Services	129
3.	Assessment BOD-1 (Ministry of BUMN's Competency)	9
4.	Technical Competency Assessment	318
	Total Employees Assessed	5.492

*) ASTONIA is BTN's internal application for employee assessments.

2024 Employee Promotion Details

Person Grade	Number of Employees
2B	1
2C	108
2D	114
2E	344
3B	170
3C	172
3D	82
3E	2

Person Grade	Number of Employees
4A	36
4B	10
4C	9
4D	5
5A	3
5B	1
Total	**1.057**

Details of Participants in the Talent Acceleration Program (TAP) and BTN Millennial Leader 2024

Person Grade	TAP *Batch* 1	TAP *Batch* 2	BTN Millennial Leader	Regional Leader Development Program (RLDP)
	Number of Participants	Number of Participants	Number of Participants	Number of Participants
2E	-	-	-	17
3A	-	-	3	-
3B	1	3	18	-
3C	16	40	-	-
3D	34	23	-	-
3E/4A	23	6	-	-
4B	3	-	-	-
Total	**77**	**72**	**21**	**17**

Performance Evaluation

Policy

Performance Management is a process of ensuring the achievement of all employees' performance in supporting the company's goals through a well-structured system. This system includes the formulation and determination of performance targets, monitoring (guidance/coaching), assessment, and evaluation. The objective of Performance Management is to create clarity regarding the expected results that the company holds employees accountable for, according to their respective positions. A well-managed Performance Management System can effectively differentiate employees' performance levels as the basis for determining fair compensation through Performance Appraisal. The performance evaluation process follows a performance management cycle, which includes:

1. Formulation and Determination of Performance Targets which is the process of determining performance targets to be achieved for 1 (one) year and making a commitment between superiors and subordinates to support the achievement of Unit Performance and Company Performance.
2. Performance Monitoring which aims to ensure that performance targets can be achieved from time to time.
3. Performance Assessment, namely the process of evaluating performance targets and their achievements.

The components to be assessed covered:

a. Performance Assessment (90% Weight)

It is an assessment based on the Key Performance Indicator of the employee's position. The performance appraisal consists of 2 (two) components, namely:

- Cascading KPI (Key Performance Indicator) components, namely KPIs obtained from cascading results (according to the responsibilities and roles of the individual) against KPIs from the layer above or KPIs of work units. This component reflected the contribution of an individual to the success of his work unit. The types of cascading were as follows:

  Fully Cascade : KPI Units were fully passed down to employees with the same target

  Partially Cascade : KPI Units were passed down to employees with divided targets/ segments (according to individual responsibilities).

  Contributory Cascade : Unit KPIs were passed down to employees in terms of other KPIs that can support the achievement of the unit's KPIs (according to the employee's role).

- The Performance Indicator (PI) component was a measure of the success of the implementation of the employee's job description. This component reflects individual performance based on their job description.

b. Implementation Assessment (10% weight)

The 2024 cultural implementation assessment uses the application of a 360 multirater survey conducted by >2 sources of information such as direct superiors, co-workers and subordinates with a number of assessors and each assessment weight that has been determined based on the job layer in order to provide a comprehensive and thorough assessment of the behavior of the core values of AKHLAK BTNners from various sources.

Performance Assessment Implementation

Employee performance evaluation is conducted through self-assessment by each employee, which is then approved by their direct supervisor or manager. To determine the final score, the Human Capital Committee of each work unit calibrates the evaluation based on the bell curve method, aligned with corporate performance and the performance of each work unit.

The performance evaluation process for the 2024 performance year is currently ongoing, while the results of the 2023 performance evaluation are as follows:

No.	2023 Score Category	Number of Employees
1.	Performance Rating 1	1.539
2.	Performance Rating 2	2.974
3.	Performance Rating 3	6.560
4.	Performance Rating 4	236
5.	Performance Rating 5	28
Total Employees		**11.337**

Remuneration

Policy

In providing remuneration, had been issued which improved the previous provisions, namely the issuance of Special Policy (KK) No.3-B, concerning Remuneration. Management of Human Resources or Human Capital became one of the most important priorities in running the Company. Employee remuneration was a salary and compensation system implemented by the Company to reward employees based on a number of factors.

The scope of the remuneration system included governance in providing remuneration, compensation, benefits, benefit compensation based on statutory

regulations and awards. The application of governance in providing remuneration aimed to encourage prudential banking, namely that risk taking in carrying out business activities was carried out in a measurable manner and refered to statutory provisions regarding risk management so that excessive risk taking by decision makers could be avoided and business continuity and the health of the Company could be maintained.

The remuneration policy prepared had to be at least consider:

1. Creating effective risk management;
2. Company's financial stability;
3. Adequacy and strengthening of the Company's capital;
4. Short-term and long-term liquidity needs;
5. Future income potential.
6. Prioritize the principle of equality without distinguishing gender.

Remuneration Implementation

In line with its remuneration principles, the Company applies a performance-based reward system, meaning that the higher an employee's performance, the higher the remuneration they receive, with the expectation that this will enhance productivity. The Company also upholds gender inclusion in remuneration, ensuring that there is no difference in pay between male and female employees. Remuneration is reviewed periodically to assess its competitiveness in the market. Additionally, the Company regularly participates in industry salary surveys to determine its position in the market.

No.	Position	Male		Female		Total	
		Number of Employees	Salary Amount (Million)	Number of Employees	Salary Amount (Million)	Number of Employees	Salary Amount (Million)
1.	Level 5B	2	2.739	1	1.141	3	3.880
2.	Level 4C - 5A	114	109.124	24	20.308	138	129.432
3.	Level 3C - 4B	1.119	406.194	409	136.763	1.528	542.957
4.	Level 3A - 3B	1.718	273.413	1.215	180.037	2.933	453.450
5.	Level 2D - 2F	2.895	278.398	3.548	327.814	6.443	606.212
6.	Level 2A - 2C	712	58.377	1.088	86.775	1.800	145.152
	Total	**6.560**	**1.128.244**	**6.285**	**752.839**	**12.845**	**1.881.083**

Notes:
- The total number of employees includes both PKWT and PKWTT.

Besides the monthly salary, the Company also provides additional remuneration or benefits, including:

a) Annual Bonus
b) Overtime Allowance
c) Holiday Allowance (THR)
d) Tax Allowance (PPh 21)
e) BPJS Health and BPJS Employment Benefits
f) Service Award
g) Pension Allowance
h) Scholarship for Bachelor's & Master's Degrees (Domestic & International)
i) Medical Assistance
j) Periodic Health Check-ups
k) Condolence Assistance
l) Company-Owned Vehicle Program (COP)
m) Employee Loans/Financing (Kredit Sejahtera Pegawai)
n) Disaster Relief Assistance
o) Communication Allowance
p) Housing Facilities
q) Location Allowance (Hardship Allowance) for specific areas.

Pension Program

Policy

The Bank BTN Pension Program is divided into two programs, namely the Defined Benefit Pension Program (PPMP) managed by the Bank BTN Pension Fund, and the Defined Contribution Pension Program (PPIP) managed by a third party Financial Institution Pension Funds . The PPMP program is a program for employees who entered Bank BTN before 2004, whereas after 2004 employees will automatically enter the PPMP program.

In the Defined Benefit Pension Program (PPMP), employees still receive benefits equal to the formula determined by the Pension Fund with the maximum amount of Pension Benefits that could be received by employees of up to 80% of the Basic Pension Income referring to the Board of Directors Decree which regulates PT Bank Pension Fund Regulations State Savings (Persero) Tbk (Dapen BTN), In the Defined Contribution Program, permanent employees receive retirement benefits from the accumulated contribution balance of 2.5% of the salary concerned and 7.5% from the Company and the results of its development.

Service Recognition Award

- Karya Purna Bhakti Award, Given to employees who retire at the ages of 36 years and 56 years.
- Karya Satya Abdi Award, Awarded to employees who pass away while performing their duties in safeguarding the bank's reputation, security, assets, and interests.
- End of Service Award, Given to employees who are honorably discharged and to employees who pass away.

Retirement Program Implementation

Retirement Preparation Program (MPP)

The MPP program is intended for permanent employees, who have reached the age of 55 years. The Retirement Preparation Program is designed to help employees prepare themselves financially, mentally, and physically to face retirement so that employees can enjoy a comfortable and peaceful life after retirement and are released from daily work. The MPP program is an optional program for employees, if employees do not apply for the MPP program, the employee's status will remain an active PKWT employee until retirement at the age of 56 years.

The implementation of the retirement preparation program is as follows:

1. Training Program, which is a provision program in the form of skills training with materials/fields that are in accordance with the talents/desires of the related employee, including Financial Management, Job Searching, and Entrepreneurship Trainings.
2. Career Opportunity Program, which is given the opportunity to provide service assistance to the Company, Subsidiaries and/or Affiliated Companies. The form of service assistance in question is as a trainer or Advisor.
3. Coaching Program, which is the provision of counseling that aims to prepare Employees to face life after retirement, and the provision of Coaching related to developing entrepreneurship and job searching.

During 2024, 22 employees had conducted MPP Program.

Human Capital Information System

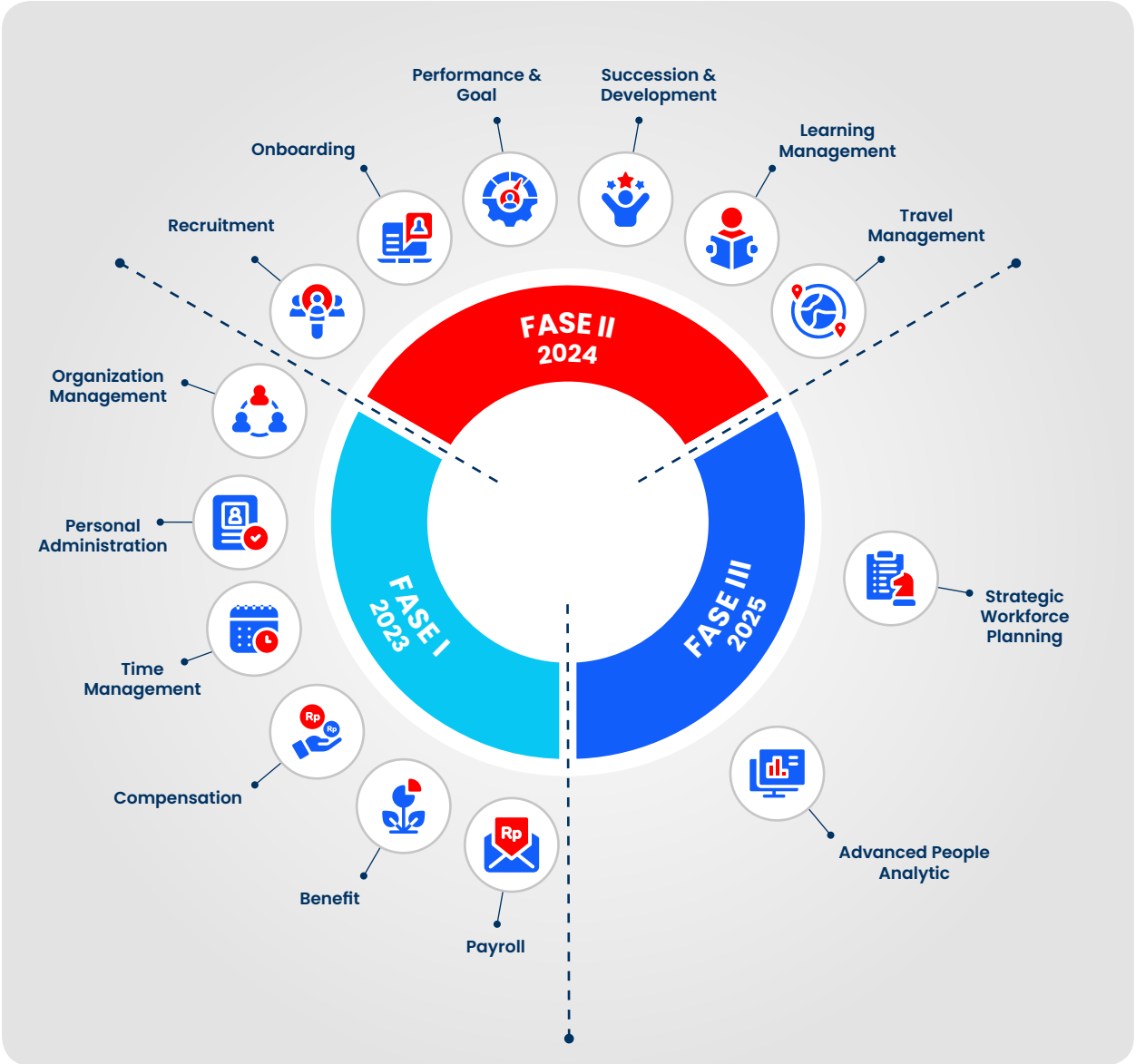


Management of the company's Human Capital was supported by the development of adequate information technology (IT) to ensure operational processes in managing the Human Capital cycle and fulfilling employee rights could run well, as follows:

1. There is an overall monitoring mechanism for the alignment of vision and mission and various governance, namely access, security and compliance.
2. The need to ensure alignment of the HR system landscape with the overall HR strategy.
3. Reduce the level of manual data intervention from personnel to other internal systems in the company.
4. Ensure the achievement of operational excellence in the HR function and the quality of HR system services that is evenly distributed to the smallest work unit in all company operational areas.
5. Systematic implementation of the entire talent management cycle.
6. Availability of insight into the entire HR process to support decision making for management.

In accordance with the Company's Human Capital Roadmap 2022-2025, one of the Company's initiatives is to develop a Human Capital Information System (HCIS), which is divided into 3 (three) development phases, such as by implementing a Cloud-based HC System from the previous HC system, which was on premise basis.

1. **Phase I: Foundation Phase**
   The development of the main modules related to the HC system is implemented to support the Payroll process such as compensation and benefits as well as basic components such as organizational management and personal administration.
2. **Phase II: Implementation of HC End To End Cycle**
   The HC management cycle model starts from Recruitment and Onboarding to development and succession.
3. **Phase III: Scale Up & Deep Dive Phase**
   Implementing Workforce Planning and Advanced People Analytics modules to support management in making data-based decisions and developing Artificial Intelligence (AI) in HC business processes.


Performance & Goal
Succession & Development
Onboarding
Learning Management
Recruitment
Travel Management
FASE II 2024
Organization Management
Personal Administration
FASE I 2023
FASE III 2025
Strategic Workforce Planning
Time Management
Compensation
Advanced People Analytic
Benefit
Payroll

Culture Internalization

The implementation of the Corporate Culture Program in 2024 still refers to the 4 (four) pillars of Corporate Culture with the implementation of cultural programs classified into 2 (two), namely:

1. Main Program, which is a corporate culture program which is mandatory to be implemented by each work unit in accordance with the 4 (four) Pillars of Corporate Culture
2. Selected Program, which is namely a corporate culture program that is a work unit option that is tailored to the needs of the work unit.

As a form of evaluation, review and identification of the implementation impact of the corporate culture program, Corporate Culture Monitoring was conducted to work units along with independent consultants. The monitoring results showed that the implementation of the culture program had focused on the impacts generated and from partner testimonials showed good indications especially in maintaining and deepening relationships. This result on a measurement scale was at point 3.1 on a scale of 5 or it was in the average category. In 2024, the internalization of corporate culture at BTN focused on 3 (three) areas that were mutually beneficial in building an impactful corporate culture, as follows:

1. Leadership, which focused on the role of leaders as role models and the interaction of leaders in the process of internalizing corporate culture.
2. Symbol/Policy & Program, which dedicated on the effectiveness of the process of internalizing culture through the implementation of programs and procedures that are implemented.
3. Communication, which concentrated on communication and dissemination of information regarding the internalization of corporate culture.

Internalization of corporate culture through these three areas was realized into 2 (two) program categories, such as the Keys Program and the Thematic Program.

Keys Program

No.	Program Name	Description	Objectives
1.	**Corporate Culture Pillar Mascot Launching**	Launching of 4 (four) mascots depicting each of the Company's Cultural Pillars, as follows: a. Sally "The Cheetah" as Sales & Service Culture mascot b. Ringgo "The Owl" as Risk & Governance Culture mascot c. Percy "The Lion" as Performance Culture mascot d. Lea "The Dolphin" as Learning Culture mascot	Strengthening the internalization of corporate culture through the use of mascots in information dissemination
2.	**Culture Award 2024**	Awards given to Structural Change Agents and Non-Structural Change Agents), who have implemented corporate culture optimally	• Providing boosters to Change Agents so that they can continue and consistently implement the company culture in each work unit. • Optimizing work units in implementing corporate culture programs so that they can have an impact on performance achievement.
3.	**Leadership Forum**	Establishing executive forum as an effort to encourage the role of leaders in business development and strengthening corporate culture	• Confirming the engagement of leaders and corporate culture in achieving the company's vision and mission. • Aligning the focus of strategy and as a stimulus for the role of leaders in accordance with business challenges and opportunities.
4.	**Culture Campaign**	Campaign strategy related to the company's culture internalization program and/or other HC programs through communication media while integrating various internal communication channels. The campaign is carried out in the form of narratives, posters and videos through CEO/BOD Messages.	Communicating directions and/or messages related to company culture so that they are more easily accepted and understood by employees.

No.	Program Name	Description	Objectives
5.	**Townhall AKHLAK**	The series of activities to commemorate 4 (four) years of AKHLAK in the form of a town hall from the Board of Directors to all employees with the theme "AKHLAK as BUMN for Sustainable Performance Growth and Increasingly Better Services".	Providing directives to employees to optimize the implementation of AKHLAK in performance improvement.

Thematic Program

No.	Program Name	Description	Objectives
1.	**Culture Challange**	Organizing a video competition with the theme of Core Values AKHLAK, 4 Pillars of Culture and Implementation of Respectful Workplace Policy (RWP).	Providing an understanding to employees regarding the importance of corporate culture in driving the achievement of corporate performance.
		A reward program for employees who successfully uncover online gambling and illegal online loan use by employees.	• Mitigating employees not to fall into the trap of using illegal online loans and online gambling. • Optimizing direct supervision and monitoring by employees of the use of illegal online loans and online gambling in the work environment.

Employee Engagement Survey

As a proactive step in identifying internal aspects that support or hinder employee engagement, BTN conducted an employee engagement survey. This survey aims to measure the level of employee engagement and identify areas for improvement.

The results of the 2024 Employee Engagement Survey (EES) overall showed an average score of 93% on a scale of 100%. This survey measures the level of employee Sustainable Engagement with a list of Key Drivers elements as follows

a. Pay & Benefit
b. Collaboration & Teamwork
c. Competitiveness
d. Customer Focus
e. Efficiency
f. Empowerment
g. Goals & Objectives
h. Innovation
i. Leadership
j. Learning & Development
k. Performance Management
l. Retention
m. Supervision
n. Sustainable Engagement
o. Talent Management
p. Wellness & Stress
q. Workload & Flexibility

The results of the Employee Engagement Survey are used as a reference in developing strategic programs to improve employee productivity, employee satisfaction (employee wellbeing) and improve talent management programs as well as encourage improved communication between employees and management in supporting and creating a positive and productive work culture.

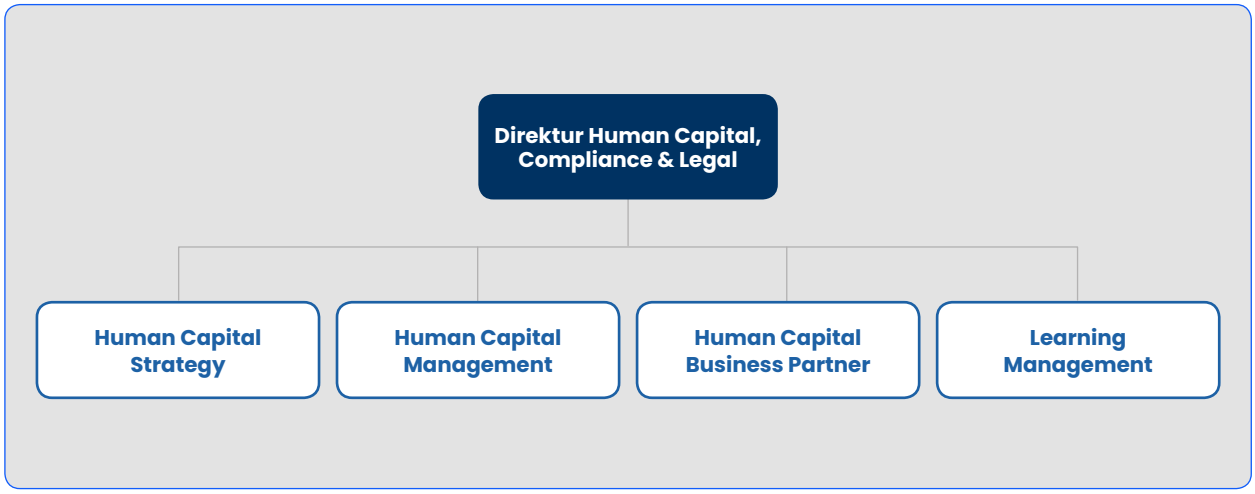
Information Disclosure to Employees

In implementing information disclosure to Employees, the Company has PPDigital. PPdigital is an integrated platform that can be used by BTN employees to access internal regulations of the Company. Employees can also access internal regulations of the Company so that those documents can be used as guidelines in performing their work operations.

Human Capital Management Structure

Human Capital Management in the Company is continuously developed to ensure that the utilized policies, processes, procedures, and technologies are the best according to best practices and related to statutory. The Company's Human Capital management organization is under the leadership of the Director of Human Capital, Compliance, & Legal, which is managed by 4 (four) Divisions, such as Human Capital Strategy Division (HCSD), Human Capital Management Division (HCMD), Human Capital Business Partner Division (HCBD), and Learning Management Division (LMD). The following are the respective functions of the 4 (four) Human Capital Divisions:

1. Human Capital Strategy Division (HCSD) functions to prepare short-term to long-term strategies and plans for Human Capital, manages organizational completeness, and conducts studies, and provides policy proposals related to Human Capital.
2. Human Capital Business Partner Division (HCBD) functions to exercise advocacy roles related to human capital service and operational policy strategies to partner divisions.
3. Human Capital Management Division (HCMD) functions to implement services and operations in the fields of talent acquisition, career management, performance management, compensation benefits, and termination of employment, employee relations, industrial relations, and managing Human Capital technology.
4. Learning Management Division (LMD) functions to manage and ensure the implementation of employee competency improvement including needs analysis, design, development, implementation programs, and evaluation of development and learning programs to support the achievement of the Company's business strategies and goals.



Human Capital Work Plans in 2025

In preparing the Human Capital Work Program, the Company refers to several aspirations, including:

1. Shareholder Aspirations (APS) 2025
2. Human Capital Roadmap 2022-2025
3. Corporate Plan 2025-2029
4. Corporate Strategic Themes 2025
5. Join Planning and Challenge Sessions 2025

The 2025 Shareholder Aspirations have 5 (five) objectives, as follows:

1. Increasing the maturity of human capital management maturity level sustainably, based on the SEOs Human Capital Architecture.
2. Improving employee productivity, with a relevant formula to the industry, and a better target than the average in the last 3 (three) years.
3. Leveraging the company's average diversity in nominated talent, mainly through the development of young and female talents.
4. Cultivating a respectful work environment with an inclusive AKHLAK culture, based on the AKHLAK Culture Journey and Respectful Workplace Policy.
5. Establishing strategic partnerships with employees, including implementing employee well-being programs so that a stable work culture is built and contributes positively to improve the company's performance sustainably.

To support BTN's new vision in 2025, which was "Main Partner in Financial Empowerment of Indonesian Families", Human Capital continuously implement the mission in the HC sector, such as "One of Home of Indonesia's Best Talent". In addition, in 2025, the Company will prepare the HC Roadmap 2025 – 2029, which has been part of the Company's long-term plan, as a continuation of the previous HC roadmap.

Specifically, the thematic preparation of the 2025 Human Capital work program is aligned with the 2025 Corporate Theme, entitled "Strengthen Engine For Sustainable Funding" dan tema program HC 2025 yaitu "Build Strong Learning & Development Engine and Optimize HC Advisory Function to Support Business Strategy & Sustainable Funding".

The 2025 Human Capital strategy initiative will focus on capability development and productivity improvement, which are explained as follows:

CAPABILITY

1. **Establish New Sales & Collection Academy**
   BTN has launched a new academy, which is dedicated to develop skills in sales and collections. The program aims to support business sustainability and increase workforce productivity.
2. **Reskilling & Upskilling Program**
   This competency enhancement program is designed to meet the needs of corporate transformation, which aims to enable employees to deal with business challenges through new and relevant skills mastery.
3. **Accelerating IT, Digital, Analytic & Risk Management**
   This initiative prioritizes strengthening capabilities in digitalization, analytics, and risk management by accelerating the adoption of the latest technologies. This program aims to ensure more effective and efficient business processes.
4. **Leadership & Future Competency**
   The program focuses on developing leadership skills that are in line with future needs. This program aims to create competent leaders who are ready to face long-term challenges, supporting the sustainable growth of the organization.

PRODUCTIVITY

1. **Workforce Shifting**
   BTN is refining its workforce structure to adapt to future business needs. Since 2024, the company has adjusted the composition of its workforce by emphasizing sales positions (especially those strengthening the funding sector), IT & Digital. This change is a strategic step in responding to the decline in traditional transactions at branches due to the increase in digital transactions.
2. **Self-Funded Incentives & Enhance KPI Sales**
   Improving incentive mechanisms to create a productivity-oriented organization that is aligned with achieving business targets to encourage employees to be more productive, and associated with improving sales KPIs so that employees can focus on key indicators, such as funding achievement, mobile banking acquisition, and increasing cross-selling. This attempt is conducted to significantly improve the company's business performance.
3. **Low Performer Policy**
   To maintain and create an organization that is always oriented towards continuous improvement and productivity, some improvements are performed with a more targeted performance improvement plan mechanism.

INFORMATION TECHNOLOGY



The Company periodically carries out Information Technology (IT) innovations to support the Company's business. Several Information Technology (IT) innovations have also been carried out in 2024.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Information Technology Strategy Plan

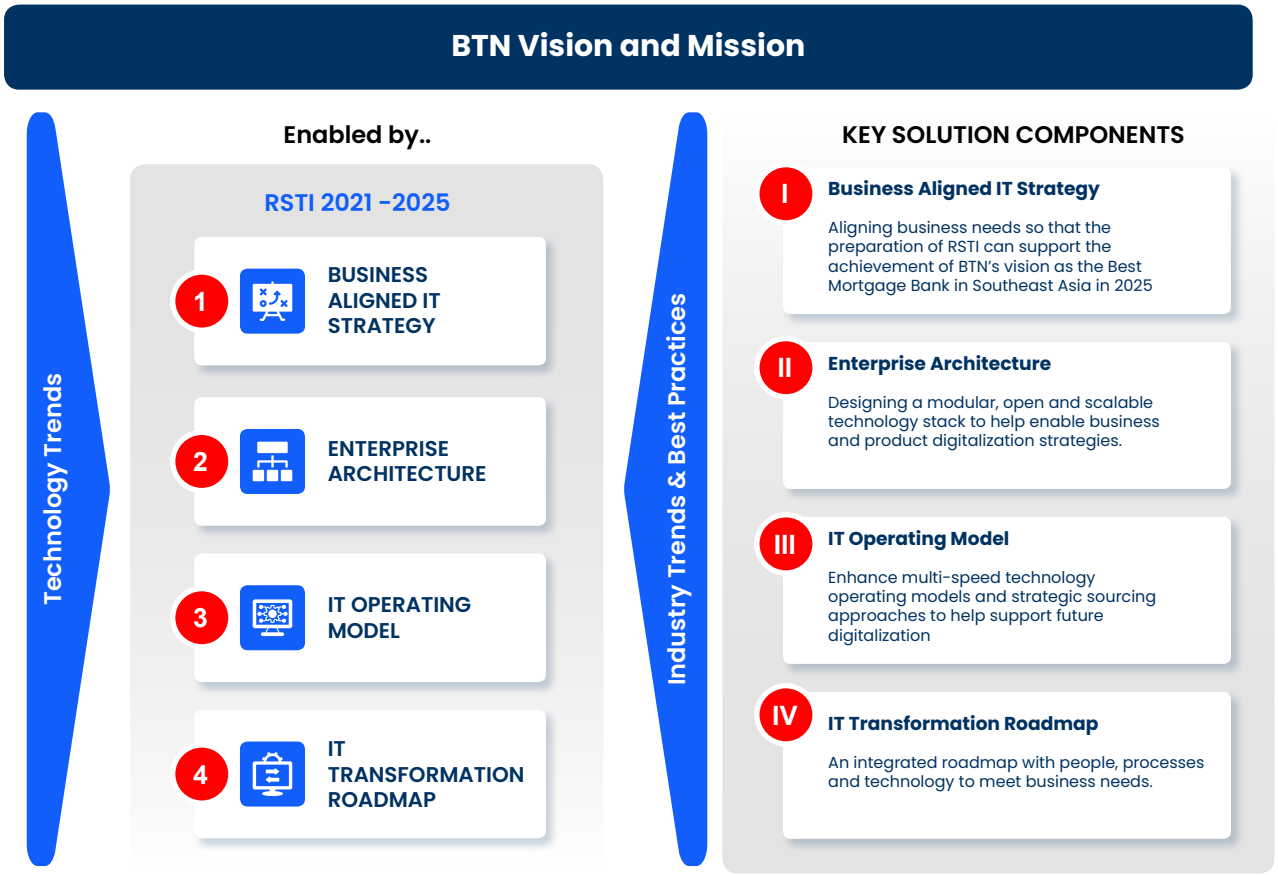


Information technology plays a significant role in supporting the Company's business. Hence, the Company initiates specific strategic planning for IT that is expected to be used as a reference in developing Information technology and improving infrastructure and security of information and data processing. Company's Information Technology Strategic Plan (RSTI) 2021- 2025 is supported by 4 (four) fundamental pillars, namely:

1. **Business Aligned IT Strategy**
   Align all business necessities to ensure the formulated Information Technology Strategic Plan (RSTI) 2021-2025 supports the Company's vision to be The Best Mortgage Bank in Southeast Asia by 2025. To attain the Company's visions, 6 (six) essential themes in technology have been formulated, namely:
   a. End to end Housing Ecosystem Digitalization
      Support the Company's business from upstream to downstream in the future.
   b. Digitized Operations
      The Company's business processes advancement through digitalization using robot technology or platform tools.
   c. Data-driven Bank
      Utilize the use and processing of accurate and quality data to improve services.
   d. Flexible Multi-speed IT
      The Company accelerates the development and quality implementation of information technology to adapt fast to every change.
   e. Elastic & Resilient Infrastructure
      The Company provides an integrated system, aggregation between systems, and better accessibility to actualize improved effectivity.
   f. Security by Design
      The Company provides secure banking services for customers.

2. **Enterprise Architecture**
   Designing a modular, open, and scalable technology stack to support business and product digitalization strategies.
3. **IT Operating Model**
   The Company improves the multi-speed technology operation model and strategic sourcing approach to support digitalization in the future. In 2024, the Company owned IT Maturity Level value of 3.50 as measured using COBIT 2019. This reflects that information technology operational processes have been well-defined and managed. The company has also made improvements to the IT Operating Model to support the Company's business strategy in 2023, including:
   a. Fulfilling human capital needs by conducting recruitment of ODP IT or experienced hired.
   b. Conducting training IT to enhance their capability.
   c. Performing reviews on IT policies
4. **IT Transformation Roadmap**
   It is an integrated roadmap to human resources, processes, and technology to fulfill business needs. The Company has illustrated the IT Transformation Roadmap according to 6 (six) technology themes that are used to achieve its visions. In 2024, the Company developed an agile based system (i.e. digital channel).

The preparation of RSTI 2021-2025 is supported by 4 main pillars



Information Technology Innovation

The Company is always innovating in information technology to assist its business. The following information technology innovations were implemented in 2023 among others:

1. Cloud-based Human Capital Information System
   It is an integrated system for managing Company employee information such as remuneration, salaries and so on.
2. Artificial Intelligence
   Implementation of Artificial Intelligence to support more effective and efficient operational process through Data Science Platform, Chatbot Hello Operations by BTN, Robotic Process Automation, Chatbot TARA BTN BEST and Cyber Threat Intelligence.
3. Super Apps balé by BTN
   It is a super application developed by the Company as a transformation from BTN Mobile application. This application is created to easier for society to make financial transactions, including finance and banking services. balé by BTN application prioritizes practical transaction and financial management, provides convenience for customers in making daily financial transactions. Through this service, customer can make business transactions, control cash flow, and manage their financial effectively and efficiently.
4. BTN Digital Store
   It is the Company's branding for Branch Offices, Sub-Branch Offices or other places with the digital experience that aims to improve sales and service capacity oriented to customer satisfaction. The only features in BTN Digital Store are: customer service digital, augmented reality experience and video banking for various banking solution and beyond banking services, accelerating the account opening process, Artificial Intelligence technology usage, Digital Form, The Living City, and so on.
5. BTN Laku
   It is an application developed to facilitate SME & CP Sales in data management and verification & OTS to support SLA achievement and optimization productivity of KUR and KUMK products. BTN Laku is developed gradually to the amount of KUR and KUMK up to IDR500 million.

In the midst of increasingly dynamic global changes, BTN continues to advance its digital transformation in the national banking industry, especially to realize BTN's vision as the main partner in the financial empowerment of Indonesian families. The Indonesia Industry 4.0 Readiness Index (INDI 4.0) is not just an indicator, but a roadmap in the journey toward becoming a better and more innovative company. In 2021, BTN's Indonesia Industry 4.0 Readiness Index (INDI 4.0) readiness assessment achieved an impressive score of 2.73, at Level 3. This achievement reflects the Company's commitment to becoming a mature company in adopting Industry 4.0 principles.

BTN's transformation is contained in the Company's Long Term Plan (RJPP) which aligns with the pillars of Indonesia Industry 4.0 Readiness Index (INDI 4.0) to become a strong foundation in every strategic step of the Company as follows:

1. Management and Organization
   In an era of continuous digital disruption, BTN shows a strong commitment to adapt and develop through structured digital transformation. As part of its efforts to achieve full readiness to face the challenges of Indonesia Industry 4.0 Readiness Index (INDI 4.0), BTN has also undertaken fundamental changes in organization, work culture and human resource development. Some strategic initiatives that have been implemented include:
   - Establishing a Digital Business Directorate at SEVP level in 2024 to increase the Company's digital capabilities holistically, both in terms of product development, partnerships and sales.
   - Strengthening digital transaction support is reflected through the establishment of the Digital Operations Division to ensure the Company's services and operations are delivered well.
   - Strengthening IT, Digital and Operation Risk to mitigate potential risks in cyber security and digital areas.
   - Organizing the BTN Innovation Award as part of the BTN Excellence Award to encourage the creation of new company innovations.
   - The Company has prepared an Information Technology Strategy Plan (RSTI) as an Information Technology (IT) development strategy roadmap to support the Company's vision in alignment with INDI and RJPP.

2. People and Culture
   Transformation is not only about technology, but also about people. Digital culture is aligned with the core values AKHLAK (Trustworthy, Competent, Harmonious, Loyal, Adaptive and Collaborative). The company is also committed to continuously developing digital talent through various training programs, workshops and certifications. In addition, the company will also focus on fulfilling critical talent in the technology area, especially for the main functions supporting the Company's digital transformation.
3. Products and Services
   The evolution of BTN Mobile into balé by BTN is a concrete manifestation of the Company's commitment to providing holistic solutions for customers. More than just a financial application, balé by BTN is a super app that embraces daily needs and modern lifestyles, creates one-stop services that are intuitive and responsive and integrates with mortgage services as the Company's core business.
4. Technology
   Technological innovation is one of The Company's top priorities, from the use of Artificial Intelligence, Data Science Platform, to Chatbot Hello Operations by BTN and Robotic Process Automation. These advancements ensure more effective, efficient and secure customer services and operations. This digital advantage is strengthened by Cyber Threat Intelligence to maintain system integrity in the company's system.
5. Company's Operation
   The company continues to transform ensuring its operations become leaner and more efficient. One of the systems launched is the End-to-End (E2E) e-Procurement System which serves as an integrated procurement solution. Every process, from planning to payment, is managed efficiently, creating a sustainable value chain and supporting transparent and accountable governance.



Information Technology Infrastructure

The Company has taken proactive action in facing rapid banking industry dynamic to strengthen Information Technology (IT) as a part of the main strategic of the Company. This improvement is carried out continuously through system modernization, current digital technology implementation, and data improvement. This strategic step was taken to improve company operational stability and capability in providing reliable, fast and innovative service based on the public's needs in the digital era.

During 2024, the Company had several focuses to become a trusted partner in providing the best Information Technology (IT) services and operation excellence for fostering business goal achievement. To elevate those focuses, the Company carries out continuous improvement in Information Technology (IT) infrastructure through various strategic initiatives, including:

1. Enhanced the Resilience of IT System
   The Company has strengthened Information Technology (IT) system resilience through the arrangement of strategic steps in optimizing Data Centers and improving Information Technology (IT) disaster recovery. By Data Center optimization, the Company improves flexibility and system performance, operational efficiency, and accelerates an Information Technology (IT) Service Management process. Meanwhile, the improvement of IT disaster recovery has been done through the development of more speed and effective recovery mechanism, to ensure the Company's operational continuity when technical problems or disaster occur.
2. Automated the Infrastructure Process and Daily Application Checks
   The Company has arranged Information Technology (IT) infrastructure automation implementation plan and application with Artificial Intelligence enterprise technology adoption. Thus automation is arranged to support real-time operational activities and reduce system complexity. With thus automation, the Company identifies and resolves system anomalies earlier, thus preventing bigger impact for business operational. Moreover, this initiative also supports both IT resources allocation and increase reliability and service quality for customers.
3. Advanced the Infrastructure and Network
   The Company continuously enhances infrastructure and network through system improvement High Availability (HA) in the main network and application to determine service availability. Moreover, infrastructure and network development in Menara 2 BTN was carried out to support business needs in the Branch Office, Regional Office, Division, and Digital Store. On the other hand, increasing infrastructure capacity through technology Hyper-converged (HCI) strengthen system performance.
4. Upgraded The Core Banking System Performance
   The Company has improved its main system capacity to settle reliability and availability in supporting customer transactions. This aims to ensure that the system can handle bigger numbers of transaction with optimal and stabile performance.
5. Expanded The Integrated Monitoring
   The Company has expanded monitoring through increased Integrated Monitoring Room Menara 2 BTN. Thus expansion is a strategy to support network development and solve Information Technology (IT) system complexity. In the other hand, monitoring expansion in server, network, and critical application are done in real time that is integrated with automatic problem analysis thus follow up of the problems can be done rapidly and appropriately.
6. Established the IT Outlet Infrastructure Index
   To assess the success of Information Technology (IT) standardization across all domains, including network, infrastructure, and security standardizations, the Company has implemented a score/index system. This indexing process involves the evaluation various parameters such as standard compliance, performance specification, compatibility with system and update status. Those effort are done to keep stabilize Information Technology (IT) system and the usage can be monitored thus the customer get the same experience in each outlet.

Through various achievements in 2024, the Company keeps strengthening the stage in realizing a banking ecosystem based on technology. The Company believes that reliable information technology infrastructure is the key to provide the best service, improve value added for stakeholders, and support sustainable digital transformation.

Information Technology Governance

The Company has governance and technology that keeps up with current developments to help optimize business operational processes. Apart from that, the Company also has information technology infrastructure, information technology security and adequate resources. According to the IT Maturity Level assessment which was carried out, the result shows that the assessment of 24 priority control has reached the minimum capability of Level 3 (Defined) as required by the Ministry of State-owned Enterprises with the following details:

No.	Control	Assessment Results
1.	EDM01 - Ensured Governance Framework Setting and Maintenance	4.00
2.	EDM02 – Ensured Benefit Delivery	3.00
3.	APO01 – Managed I&T Management Framework	4.00
4.	APO02 – Managed Strategy	4.00
5.	APO03 – Managed Enterprise Architecture	3.00
6.	APO05 – Managed Portfolio	3.00
7.	APO06 – Managed Budget and Costs	3.00
8.	APO09 – Managed Service Agreements	4.00
9.	APO10 – Managed Vendors	4.00
10.	APO12 – Managed Risk	4.00
11.	APO13 – Managed Security	4.00
12.	APO14 – Managed Data	4.00
13.	BAI02 – Managed Requirements Definition	3.00
14.	BAI03 – Managed Solution Identification and Build	3.00
15.	BAI04 – Managed Availability and Capacity	4.00
16.	BAI06 – Managed IT Changes	3.00
17.	BAI07 – Managed IT Changes Acceptance and Transitioning	3.00
18.	BAI09 – Managed Assets	3.00
19.	BAI011 – Managed Projects	4.00
20.	DSS01 – Managed Operations	3.00
21.	DSS02 – Managed Service Request and Incident	4.00
22.	DSS04 – Managed Continuity	4.00
23.	DSS05 – Managed Security Services	4.00
24.	MEA01 – Managed Performance and Conformance Monitoring	4.00

Besides IT Maturity Level assessment, the Company also updates information technology governance, as follows:

1. General Policy Number KU.5 dated December 27, 2024 concerning General Policy for Information Technology (IT), Data Management and Digital.
2. Specific Policy Number KK.5-A dated 27 June 2023 concerning Specific Policy for Information Technology (IT) Procedure.

3. Specific Policy Number KK.5-B concerning Specific Policy for IT Security.
4. Specific Policy Number KK.5-D concerning Specific Policy for IT Standardization.
5. Specific Policy Number KK.8-C concerning Specific Policy Business Continuity Management.
6. Specific Policy Number KK.8-E concerning Specific Policy for Implementing Information Technology (IT), Digital, and Cyber Risk Management Procedure.
7. Specific Policy Number KK.9-D concerning Specific Policy Director Committee Governance Procedure.
8. Specific Policy Number KK.5-2 concerning Specific Policy for Placement of Electronic System.
9. Technical Instruction Number PT.5-A.1 concerning Technical Instructions for SOP.
10. Technical Instruction Number PT.8-E.1 concerning Technical Instructions for Implementing Information Technology (IT), Digital, and Cyber Risk Management.
11. Technical Instruction Number PT.5-B.2 concerning Technical Instructions for Information Technology Security Baseline.
12. Technical Instruction Number PT.5-B.1 concerning Technical Instructions for Information Security Management System (SMKI).
13. Technical Instruction Number PT.5-D.1 concerning Technical Instructions for Implementing Information Technology (IT) Standardization.
14. Technical Instruction Number PT.8-C.1 concerning Technical Instructions for Business Impact Analysis.
15. Technical Instruction Number PT.8-C.1 concerning Technical Instructions for Business Continuity Plan.
16. Technical Instruction Number PT.8-C.3 concerning Technical Instructions for Disaster Recovery Plan.

IT Security

Information Technology Security

Since 2022, the Company has information technology security task force under the Director of Information Technology, led by a Chief Information Security Officer (CISO). In maintaining information technology security, the Company divided 3 (three) main pillars, namely:

1. **People**
   Strengthening information security from the people aspect includes activities including:
   a. Security Awareness
      Company conducted education in the form of security awareness on a regular basis to all employees, customers and third parties working with BTN. Various media were used to convey security awareness such as email, bulletin, wallpaper desktop on employees' work devices every month and socialization both online and offline. Education to customers about information security becomes a priority and important so that the customers can make transactions safely and be more aware of cybercrime to protect and secure their personal information. Education to the third party working with The Company is conducted regularly so the third party keeps information security of their company and The Company data managed by them. Socialization to both customers and third parties working with BTN is conducted through media e-channel BTN, social media The Company (Instagram, X, Facebook, etc.) and various offline/marketing events carried out by the Company. The Company improved the professionalism and competence of employees as customer partners with various cyber security training and certifications.
   b. Competency Development
      Company has conducted IT Security certification and training during 2024 both for sharpening soft skills and hard skills, for example Certified in Risk and Information Systems Control (CRISC), Comp Tia Security+, Security Tools in DevSecOps Toolchain, Coaching & Strategic Business Leaders for Department Head, Business Performance through Effective Coaching for Leaders, BUMN School of Excellence (BSE) – CTO Masterclass in 2024, Leadership Development: Performance Management Strategies, Problem Solving & Decision Making, Performance Excellence Program: Strategies for Driving High Performance, Training and Certification in the field of Banking Risk Management, Training on Certified Chief Information Security Officer (CCISO), ISMS Lead Auditor/Lead Implementer ISO 27001:2022 dan Microsoft 365 Administrator. Moreover, the Bank also conducted forums and workshops, for instance, BSSN National Cyber Exercise 2024, Cyber Security Management Workshop, CISO Forum, External Nasional Cyber Exercise, Artificial intelligence Technology Workshop, Implementation of Stamp Duty Regulations Workshop, and Project Artificial intelligence Knowledge-Based.
2. **Process**
   To implement good governance in accordance with industry standards, the work process at BTN is based on the latest provisions/SOPs which are socialized and implemented consistently by all Bank stakeholders. In line with these standard work processes, BTN has implemented the following initiatives, including:

a. Establishment of a Computer Security Incident Response Team (CSIRT) which collaborated with regulators and was also supported by the latest technology and monitoring systems in the form of Security Incident and Event Management (SIEM).
b. Process of cyber security assessment on a regular basis for network, system and data safety in accordance with regulatory provisions, including:
   - A cyber security assessment based on vulnerability analysis, for example conducted vulnerability assessment and penetration test to new application, development and regular application based on application critical level which conducted by external independent parties that certified for international tester penetration standard and listed in Association for Indonesia Payment System (ASPI).
   - Cyber security assessment is based on scenarios through tabletop exercise activities, social engineering exercises with phishing techniques on email, and an Adversarial Attack Simulation Exercise (AASE). Table-Top Exercise conducted by Computer Security Incident Response Team (CSIRT) team consists of several work units that have carried out attack testing based on the scenario on a regular basis which aims to review for attack scenario playbook, response and recovery with topic:
     - Data Breach Guidelines
     - Snapshot Server DFIR
     - Chain of Custody
     - Forti-VPN-User Geography Change (Velocity)
     - Server Forensic
     - Insider Threat
     - Social Engineering
     - Insiden Data Breach
     - Ransomware
     - Insiden Operasional/Management
     - Web Application Attack
c. During the second quarter in 2024, the Company has conducted Cyber Security Maturity Re-assessment by National Cyber and Crypto Agency (BSSN) that aims to measure Information Technology (IT) security maturity level, obtained maturity level of 5 (optimum implementation) that is very good implementation and implemented thoroughly.
d. The Company has conducted Audit Surveillance ISO 27001:2013 in the second quarter and transition to ISO 27001:2022 in the third quarter in 2024 thus currently the Company has certified with security standard ISO 270001:2022.
e. In supporting government and regulatory program related to eradication of online gambling activities and buying and selling accounts in the name of Company. The Company has conducted cyber patrol using tools Cyber Threat Intelligence (CTI) owned by the Company.

3. Technology

During 2024, the Company continuously improves Information Technology (IT) security capabilities and optimization on defense capabilities adopting defense-in-depth consist of several layer security, for example: endpoint security, application security, network security, IT infra security, and data security.

a. Implementation of Network Access Control Technology
   To manage, verify and monitor devices access to network based on security policy, to protect data from unauthorized access and potential threats.
b. Improvement of Endpoint Protection Technology for Server
   To identify, prevent and response threats to devices connected to network, such as malware, ransom ware, and other dangerous activities, to protect data from leakage, damage or theft through real-time detection and protection.
c. Improvement Network Time Protocol
   Play a role in ensuring synchronization accurate time across IT system, supporting the right timestamp recording for audit log, prevent data manipulation, and support system security by ensuring time consistency in security protocol such as encryption and authentication.
d. Improvement Data Loss Prevention Technology
   To protect customer data, the Company has implemented DLP technology to mitigate leakage of customer and company data.
e. Improvement Cyber Threat Intelligence and Digital Right Protection Technology
   To ensure the visibility BTN Information Technology security is well monitored, the Company has implemented Cyber Threat Intelligence technology that actively monitoring behavior and activities of cybercrime so that BTN can anticipate the threats occur. Cyber Threat Intelligence technology has been completed with Digital Right Protection that can takedown contents which threaten reputation and harmful for company's customer.
f. Improvement Mobile Application Security
   To protect mobile application used by the customer, Company has implemented application development process using security by design. Strengthen access device used by the customers also becomes priority by implementing Mobil Application Security.

g. Improvement DNS Security and IP Address Management
   As a mitigation to protect internal IT system that access Information Technology (IT) resources on the internet if domain from non-secure websites. Optimization from DNS Security capability will be effective if combined by IP address management so that the endpoints that access these Information Technology (IT) resources can be traced.
h. Improvement in Internet Access Control and Proxy Outbound
   In order to divide and identify data communication to internet between business transactional communication and back office productivity communication so improvement internet access control through separated initiatives internet access and implementation proxy outbound are conducted.
i. Improvement Email Security
   Protect devices and email systems from email-based cyber-attack threats such as spam, phishing and attachments containing malicious files.
j. improvement availability and resilience of transactional infrastructure by implementing active security infrastructure
   Protect transactional services of BTN.
k. Improvement API Security
   Larger open banking gives consequences in increasing of API based cyber-attack exploitation, so the specific security implementation to detect and prevent API based attack that is very essential to be conducted.
l. Improvement Internet Banking Business Security
   In supporting business finance services to MSMEs, BTN established Internet Banking Business web-based services, so protection of web-based applications improving access performance website Internet Banking Business through content delivery network becomes essential to be implemented.
m. Improvement of Application Security through Manage Service Digital Application Protection
   Improving digital transactions through mobile banking services and mobile-based applications needs comprehensive security that is not only from technology but also supports controlling and follow-up from operational.
n. Improvement Database Security
   The increase in digital transactions comes with consequences of higher data access to databases so specific security solution is needed to limit and prevent cyber-attack that exploited database.
o. Improvement Microsoft Technology-based Information Technology (IT) System Management and Security
   The massive usage of Microsoft technology in the Company operation such as Windows operation system, active directory, database MSSQL, Microsoft Office productivity application and Office 365 cloud-based services creates potential risk if the operation is not carried out in accordance with best practices from the principal. Cooperation service professionals with Microsoft allow the Company to implement the latest security, operational support, and access the latest technology from principal.

Evaluation and Measurement Cyber Resilience and Security

The Company conducted measurement and evaluation of resilience and security control to optimize the information security process, including:

1. Obtained ISO 27001:2022
   To ensure that the human resources, governance and technology used were in accordance with industry standards (International Standards Organization), The Company carried out a certification process and obtained accreditation No. IS 790715.
2. Achievement of Cyber Security Maturity
   The Company together with the National Cyber and Crypto Agency (BSSN) carried out a Cyber Security Maturity assessment which aimed to measure the level of implementation and maturity of the assessment carried out by BSSN, BTN received a score of 5 (Optimal Implementation) which means implementation of cyber security has been well-organized and conducted automatically, formally, repeatedly and consistently, reviewed regularly, and improvement implementation conducted continuously.

3. Implementation of IT Security Index
   One of the strategies to encourage a Security Culture for all employees in entire work units, the Company to build an IT Security index to monitor the affectivity of security awareness programs that conducted to mitigate cyber security and information risk. Parameter, score, and indicator measured including:
   - Percentage of up-to-date endpoint security installation (antivirus, DLP) on laptop/desktop (endpoint).
   - A number of security events or anomalies derived from the laptop/desktop of employees in the work unit.
   - A number of trials on sensitive data transmission were detected by Data Loss Prevention.
   - Number and Types of Employees' Response to Email Phishing Simulation (open/clicked/submit data).
   - The accuracy of employees in work units in answering questionnaires related to information security.

The Programs of the IT Security Awareness

BTN implemented the IT Security Awareness Program which aims to increase awareness and understanding of all employees to maintain information security in the form of personal and Company data or information. Activities that have been held for 2024 are as follows:

1. Delivery by Top Management
   One of strategies in pushing the creation of security culture for all employees in all units of the BTN Company, The IT Security Index program has been implemented, which aims to monitor the effectiveness of security awareness programs that have been carried out in order to mitigate risks related to cyber and information security. The program delivered periodically every months by Top Management to the Employee by emphasizing that maintaining information security is a very important part for maintaining customer trust and BTN reputation.
2. Sosialization through Digital Platform Company's
   a. Official Website Company's
   b. Podcast
   c. Learning Management System
   d. Email Blast Security Awareness
   e. Wallpaper Desktop Security Awareness
   f. Screen Saver Security Awareness
   g. Bulletin Security Awareness
   h. Survey Pemahaman Security Awareness
3. Training and Workshop
   The Company/The Bank has conducted security awareness activity, both onsite or online, for all Employees.

Furthermore, the company also actively carried out the socialization for maintaining information security to the customers and third party partners through workshop and training either onsite or online, the company's official social media, email blast security awareness, and delivered electronic on the transaction of alertness information in financial inclusion activities.







Information Security Framework

In line with meeting the regulator's priority controls, the Company will strive to enhance cyber security and manage cyber risk more effectively by implementing the National Institute of Standards and Technology (NIST) framework through identify, protect, detect, response and recovery.

1. *Identify*
   Identifying potential information security threats and managing risks to assets effectively and comprehensively, through:
   a. The implementation of mechanisms and management of modern inventory tools to support detection and continuously update all hardware and software assets owned by the Company.
   b. The establishment and maintenance of data management processes, reviewed at least once in a year to ensure the data index is up-to-date for business needs.
   c. Security testing based on vulnerability analysis, which are vulnerability assessment and penetration testing, are conducted regularly to identify potential threats and ensure that security findings are addressed in accordance with the test results recommendation.
2. *Protect*
   Securing information assets and strengthening perimeter security to reduce identified risks, including:
   a. Establish strict access rights management through the Application Logic Access Control System (SKALA) for transactional applications, implementing least privileged access using Privileged Access Management tools, and applying Multi-Factor Authentication for centralized authentication and authorization, namely Active Directory.
   b. Implementation of encryption and the use of Data Loss Prevention to protect sensitive data, such as Personally Identifiable Information and Payment Card Industry .
   c. Implementation of network protection technologies, such as Next-Gen Firewall, Web Application Firewall, Cloud Anti DDoS, and endpoint protection including anti-malware and Endpoint Detection and Response technology to protect networks and devices.
   d. Implementation of Email Security Gateway to protect devices and email systems from email-based cyber threats, such as, spam, phishing and malicious file attachment.
   e. Conduct security awareness programs regularly through various internal media to enhance security awareness among all Employees.
   f. Restrict and manage network access connected to the Company's network and secure unauthorized devices using Network Access Control.
3. *Detect*
   Real-time monitoring and detection of security threats or incidents, including:
   a. 24/7 monitoring and analysis with Security Information and Event Management and Cyber Threat Intelligence tools to detect potential cyber attacks, user activity, network traffic and monitoring device logs and other Information Technology (IT) activities which are related to cyber security.
   b. The Cyber Threat Intelligence tools is also optimized as a cyber patrol to detect violations of the Company's brand reputation, taking down social media that does not have permission to use the Company's identity, online gambling content and online loans that use the Company's identity.
   c. Monitoring information security compliance from partners or vendors providing collaboration through Third Party Security Monitoring.
4. *Respond*
   Respond to incidents and manage risks quickly and effectively to minimize impacts and resolve problems, through:
   a. Do containment or blocking at endpoints that are indicated to be the source of cyber attacks.
   b. Blocking data communications or traffic originating from the network carrying out the cyber attack.
   c. Scenario-based security testing includes email phishing simulations and red teaming which are done regularly to measure the readiness of Employees and IT personnel to face emerging cyber attacks.
   d. Computer Security Incident Response Team (CSIRT) establishment which is responsible for handling cyber incidents and maintaining the procedures for resolving incidents quickly and efficiently.
   e. In-depth investigations through forensic activities to obtain the main cause or core of cyber attacks.
5. *Recovery*
   The recovery process from the impact of incidents that occur, both in terms of operations and reputation by returning system, application and infrastructure functions to normal conditions after an incident occurs, through:
   a. Determination of policies and procedures for assessing, determining the level of incidents as well as steps for resolving security incidents, and ensuring the handling of incidents quickly and in accordance with the impact they cause.

b. Establishing and maintaining a data recovery process using an online and offline backup system to ensure the data remains protected and can be recovered if a disruption occurs, which is part of the Business Continuity Plan and Disaster Recovery Plan.
c. Backup and restore recovery test to ensure that the backup system functions properly and the data can be recovered effectively in an emergency situation.
d. Playbook establishment for dealing with cyber incidents, which works as a guide and lesson for dealing with similar incidents in the future.
e. Table-top exercises for dealing with potential incidents and testing readiness in responding to security incidents that may occur.
f. Reporting to regulators and stakeholders.
Media statements preparation and publication of incidents.

Information Technology Infrastructure Strategy (IT)

IT development related to security has been outlined in the Information Technology Strategy Plan (RSTI) 2021-2025 which has the theme Security by design to improve the security of the Company's system and applications, including the implementation of identity & Access Management, Security & Networking Monitoring & Compliance and Integrated Patch Management. In line with this initiative, activities carried out include Fulfillment of the PDP Constitution No. 27 of 2022, Availability Security Infrastructure and technology rejuvenation, Compliance Regulator Compliance, Data and User Access Governance as well as mitigation of fraud and transaction abuse (Money Laundering and Gambling Activities).

Disaster Recovery

The bank had policies and procedures used for management in the event of a disaster which are stated in the Bank's internal policies and procedures regarding the Implementation of the Disaster Recovery Plan. Apart from that, the BTN also has an Organizational Structure for the Implementation of the Disaster Recovery Plan, the Authority of the Disaster Recovery Plan Organization, the Disaster Recovery Plan Process Flow, Categorization of Information Technology (IT) System Recovery Criticality, Backup Frequency and Retention, List of Disaster Work Teams Recovery Plan, Important Telephone List and Services Provider Contact List.

The Implementation of Information Technology Audit

The Evaluation Result on the Implementation of the Information Technology Strategy Plan

In accordance with the Regulation of the Minister of State-Owned Enterprises of the Republic of Indonesia Number PER-2/MBU/03/2023 concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises Article 210 Paragraph 1 point a, namely that the Company has an obligation to convey information from evaluation result in the Information Technology Strategy Plan (RSTI) 2021-2025 which has been Annual Report (AR). In this matter, the Company has carried out in evaluation of the Information Technology Strategy Plan (RSTI) 2021-2025 for the 2024 position by the IT Initiative Scope. Evaluation process of the Information Technology Strategy Plan (RSTI) 2021-2025 for the 2024 position, according to the Information Technology Strategy Plan (RSTI) document 2021-2025. The progress status for 2024 position is 100%.

Evaluation Results on the Effectiveness of Information Technology Implementation (IT)

In accordance with the Regulation of Minister of State-Owned Enterprises of the Republic of Indonesia Number PER-2/MBU/03/2023 concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises Article 210 Paragraph 1 point c, Banks have an obligation to convey information on the result of the effectiveness of IT implementation. Become part of the Annual Report. In this case, the bank has carried out measurements in the form of a IT Maturity Level assessment for the 2023 position using the COBIT 2019 standard and obtained an IT Maturity Level value for the 2024 position is 3,50.

The position until IV quarter in 2024, Company has successed to increase the score IT Maturity Level based on COBIT 2019 from 3,48 to 3,50 which comes from the 7 domains namely: EDM01-Ensured Governance Framework Setting & Maintenance, EDM04-Ensured Resource Optimization, EDM05-Ensured Stakeholder Engagement, APO01-Managed IT Management Framework, APO09-Managed Service Agreement, BAI08-Managed Knowledge dan BAI10-Managed Configuration. The IT Maturity value of these domains is already at Level 3 (Defined).

Annual Company Performance (According to KBUMN Technical Guidelines No. SK-190/MBU/07/2024)

1. Realization of IT Implementation Program

A. Implementation Integrated Digital Lending System - HEE002

1) This program is an initiative to develop a Lending System which integrated into internal or external systems (partners), and has a fast Lending process through the BTN LAKU (development carried out by focusing on KUR products) and Decision Engine (scale up process initial data entry, pre-screening dan data entry).
2) Position up to TW IV in 2024, progress Implementasi Integrated Digital Lending System is 100%.
3) Position up to TW IV in 2024, estimated realization progress in implementation Integrated Digital Lending System is 100% (from all budgeting investment until finish) or in the amount of 100% (from investment budgeting in 2024)
4) Effective evaluation of information technology implementation includes::
   - Impact Category: Process Improvement
   - Effective Evaluation: efficiency process up to 60% after implemented of Integrated Digital Lending System.

B. Modernization of Digital Channels - DOE001

1) This program is an initiative to develop Modernization of Digital Channels such us: Mobile Banking, Internet Banking Ritel, Internet Banking Business, transaksion of merchant EDC & QRIS, Mortgage Ecosystem & Automated Teller Machine (ATM) to comply with business needs and current market trends that can provide a better customer service.
2) Position up to TW IV in 2024, modernization progress in Digital Channel is 100%. Achievement of Fee Based Income is Digital Banking Channel Service reached IDR188,29 M or increase of 27% YoY from last year achievement of IDR148.07 M.
3) Position up to TW IV in 2024, budgeting realization progress in Modernization Digital Chennel is 71% (from all budgeting investment until finish) or in the amount of 100% (from investment budgeting in 2024).
4) Effective Evaluation of IT implementation includes:
   - Impact category: Business
   - Effective evaluation: IDR. 188,29.

C. Development of Integrated Customer Service - DOE009

1) This program is a development initiative regarding to the customer complain management channel that has not been integrated through the automation of the customer complain handling escalation process with Robotic Process Automation and the provision of features equipped with the latest 3600 customer data.
2) Position up to TW IV in 2024,development progress in Integrated Customer Service is 100%.
3) Position up to TW IV in 2024, budgeting realization progress in development Integrated Customer Service is 61% (from all budgeting investment until finish) or in the amount of 100% (from budgeting investment in 2024).
4) Effective Evaluation of Information Technology (IT) Implemantion include:
   - Impact catagory: Process Improvement
   - Effective Evaluation:
     - Process efficiency reached 99% after the implementation of credit auto SPK.
     - Proceses efficiency reached 75% after implemented Robotic Process Automation Project.

D. E2E e-Procurement Implementation - DOE015

1) This program is an initiative about developing system which is used for assisting the demand process, online ordering and purchasing of goods and services.
2) Position up to TW IV in 2024, the process of E2E e-Procurement Implementation is 100%.
3) Position up to TW IV in 2024, budgeting realization progress in E2E e-Procurement Implementation is 53% (from all budgeting investment until finish) or in amount to 100% (ftom budgeting investment in 2024).
4) Effective Evaluation of Information Technology (IT) implementation include:
   - Impact category: System Improvement
   - Effective Evaluation: the System E2E e-procurement is implemented for changing the previous system that has not been fully integrated as a whole. The System implemented in accordance with the good governance and transparance. The implementation of the E2E e-procurement system is carried out in all aspects of procurement such as the planning process, supplier management process, bidding process, inventory process to the payment process.

E. Implementation of Enterprise Risk Management Systems - DOE017

1) This program is a system developing which used to manage, indentify, measurement and likuidity risk mitigation and operational risk in automation Blotter Transaktion Treasury Company.
2) Position up to TW IV in 2024, the progress of implementation of Enterprise Risk Management System is 100%.
3) Position up to TW IV in 2024, budgetimng realization progress in Implementasi of Enterprise Risk Management System is 100% (from all budgeting investment until finish) or 100% from budgeting investment in 2024.
4) Effective Evaluation in Information Technology (IT) Implementation include:
   - Impact Category: Process Improvement
   - Effective Evaluation: Efficiency process reached 92% after implemented the Enterprise Risk Management System.

F. Implementasi Master Data & Metadata Management - DDE002

1) This program is a solution initiative for management supporting in application and important information analisys, such us customer information, bank aacount, product, and employee that can help to take the decision.
2) Position up to TW IV in 2024, the progress in Implementasi of Master Data & Metadata Management is 100%.
3) Position up to TW IV in 2024, budgeting realization progress in Implementasi of Master Data & Metadata Management is 75% (from all budgeting investment until finish)or 100% from budgeting investment in 2024.
4) Effective Evaluation in Information Technology (IT) Implementation include:
   - Impact Category: System Improvement
   - Effective Evaluation: Master Data Management tools implemented for the management of Company's data so the integrity of the data is maintained.

G. Integrated HR System - MSI001

1) This program is an intiative about Human Resource System which provide a centralized storage from the data of employee master and Human Resource Management (SDM) for finishing the Human Resource core progress.
2) Position up to TW IV in 2024, integrated progress in Human Resource System is 100%.
3) Position up to TW IV in 2024, budgeting realization progress in Human Resource System integrated is 97% (from all budgeting investemnts until finish) or 100% (from budgeting investment in 2024).
4) Effective Evaluation in Information Technology (IT) Implementation include:
   - Impact Category: System Improvement
   - Effective Evaluation: Integrated of Human Resource System through BTNBest System development implemented for changing previous system which has not been fully integrated as a whole. The BTNBest System development implemented to all Human Resources aspects such us employee data management process, training data management process, salary process, and so on.

H. Re-organisasi, Internal Capacity Assessment & Pemenuhan SDM - MSI006, MSI007, MSI008

1) This program is an initiative about the re-organization of the Information Technology Directorate, internal capacity assessment, and the fulfillment of multi-speed Information Technology (IT) resource based on the defined target-state and the completeness of the fuction and role requirements of the target Information Technology (IT) organization.
2) Position up to TW IV in 2024, Re-Organisasi progress, Internal Capacity Assessment & SDM Fulfillment is 100%.
3) Position up to TW IV in 2024, budgeting realization progress in Re-Organisasi, Internal Capacity Assessment & Human Resource Fulfillment is 79% (from all budgeting investments until finish) or 100% (from budgeting investment in 2024)
4) Effective Evaluation in Information Technology (IT) Implementation include:
   - Impact Category: Others
   - Effective Evaluation:implemented of the organize of Information Technology Directorate, internal capacity assessment and fulfillment multi-speed IT resources which a good enough reflected in increasing the IT Maturity Level value to 3.50 according to the IT Maturity Level value based on the Cobit 2019.

I. Service Level Review & IT Service Catalogue Update - MSI009, MSI010

1) This program is an initiative about the determination of respone response time and resolution time for each categories of incident management, service request, problem management, as well as evaluating and updating the IT Service Catalogue.
2) Position up to TW IV in 2024, the progress of Service Level Review and IT Service Catalogue Update is 100%.

3) Position upto TW IV in 2024, budgeting realization progress for Service Level Review and It Service Catalogur Update is 95% (for all bugeting investment until finish) or 100% (from budgeting investment in 2024).
4) Effective Evaluation in Information Technology (IT) Implementation include:
   - Impact Category: Others
   - Effective Evaluation: implemented of the re-organization of Information Technology Directorate, internal capacity assessment, and fulfillment multi-speed Information Technology (IT) resources which a good enough reflected in increasing the Information Technology (IT) Maturity Level value to 3.50 according to the IT Maturity Level value based on the Cobit 2019.

J. Oprational Center Data & Infrastructure Improvement - ERE003

1) This program is an initiative about the development of IT Oprational Service and Updating infrastructure devices.
2) Position up to TW IV in 2024, Data Center Oprational process and Infrastructure Improvement is 100%.
3) Position up to TW IV in 2024, budgeting realization process in Data Center Operation & Infrastructure Improvement is 85% (from all budgeting investment until finish) or 85% (from budgeting investment in 2024).
4) Effective Evaluation in Information Technology (IT) Implementation include:
   - Impact Category: System Improvement
   - Effective Evaluation: implemented of firmware server AIX including core encryption to 7.4 version and DRC.

K. Security & Network Monitoring Compliance - SDE002

1) This program is an initiative about the cyber threat prevention solution in term of systems, networks, data, and applications in accordqance with regulatory compliance standards.
2) Position up to TW IV in 2024, Security Progress and Network Monitoring Compliance is 100%.
3) Position up to TW IV in 2024, budgeting realization progress in Security & Network Monitoring Compliance is 69% (from all budgeting investment untul finish) or 100% (from budgeting investment in 2024).
4) Effective Evaluation in Information Technology (IT) Implementation include:
   - Impact Category: Regulatory
   - Effective Evaluation: has been sertificated ISO 27001:2022 (Information Security Management System).

2. Realization of Shareholder Aspiration Program in 2024

a. Implementation of ATM Integration (JALIN Project)

1) This program is an initiative of BUMN Ministry in the framework of shared service synergy within the sector BUMN Ministry.
2) Position up to TW IV in 2024, integrated in ATM (JALIN Project) has been reached in 537 ATM machines or 121% from 2024 target.
3) Effective Evaluation in Information Technology (IT) Implementation include:
   - Impact Category: Regulatory
   - Effective Evaluation: a compherensive implementation of ATM (JALIN Project) intergarion has been carried out in line with direction of the BUMN Ministry.

b. The Digital Channel Service Transactions

1) This program is the effort to develop a BTN transaction customer through BTN Digital Channel Service, such as channel Mobile Banking, Internet Banking Ritel, Internet Banking Business, transaksi merchant EDC & QRIS, Mortgage Ecosystem & ATM which aims to encourage an increase in Fee Based Income Digital.
2) Position up to TW IV in 2024, the achievement of Fee Based Income services in digital banking channel reached in IDR188,29 M or increasing in 27% YoY than last year achievement is IDR148,07 M.
3) Effective Evaluation in Information Technology (IT) Implementation include:
   - Impact Category: Business
   - Effective Evaluation: IDR188,29 M.

c. Cyber Security Breach (Zero Incident)

1) For 2024 to 2025, Zero Incident Cyber Security Breach has reached based on PER-2/MBU/03/2023 concerning for Governance and Significant Corporate Activities of State-Owned Enterprises and OJK Circular Letter No. 29/SEOJK.03/2022 concerning Cyber Resilience and Security for Commercial Banks. In 2024, BTN has initiated to security improvement and cyber resilience which is covering the people, process, and technology. In 2025, security improvement and cyber resilience in all aspects that will be continued to support the service of Company initiative and business.
2) Position up to mTW IV in 2024, development progress in Cyber Security Breach is 100% (there were no cyber incidents that caused the KPI do not achieved).

3) Effective Evaluation in Information Technology (IT) Implementation include:
   - Impact Category: Others
   - Effective evaluation: in 2024, BTN has initiated to enhance resilience and Bank cyber security including aspek People, Process, and Technology. reached cyber security breach (zero incident) is 100%, it can be proved bythe risk level achievement related to the second level of cyber security (the Bank's cyber security maturity condition is generally high) based on the result of the Bank's cyber security in accordance to SEOJK No. 29/SEOJK.03/2022 concerning Cyber Resilience and Security for Commercial Banks.

3. Follow-up of Audit Result and/or Information Technology (IT) Assessment

No.	Assessment/Audit	Year	Assessor/ Auditor	Numbers of Follow-up	Status			% Follow-up Completed
			Internal/ External		BS	S	T	
1.	Information Technology (IT) Audit	2024	External	14	0	14	0	100%
2.	**Assessment of Information Technology (IT) Implementation**							
	a. COBIT 2019 EDM01 – Ensured Governance Framework Setting & Maintenance	2024	External	1	0	1	0	100%
	b. COBIT 2019 EDM04 – Ensured Resource Optimization	2024	External	1	0	1	0	100%
	c. COBIT 2019 EDM05 - Ensured Stakeholder Engagement	2024	External	1	0	1	0	100%
	d. COBIT 2019 APO01 - Managed I&T Management Framework	2024	External	1	0	1	0	100%
	e. COBIT 2019 APO09 - Managed Service Agreements	2024	External	1	0	1	0	100%
	f. COBIT 2019 BAI08 – Managed Knowledge	2024	External	1	0	1	0	100%
	g. COBIT 2019 BAI10 – Managed Configuration	2024	External	1	0	1	0	100%
Total				**21**				**100%**

Description:
BS = Uncompleted
S = Completed
T = lated

4. Realization of Information technology (IT) Financing Plan (IT Spending Plan)

IT Spending	2024 Plan	Realization of TW IV in 2024	% Realization related to 2024 Plan
IT CAPEX	**Rp792.758.559.227**	Rp781.684.933.314	98,6%
IT OPEX	**Rp583.494.311.924**	Rp474.706.174.787	81,3%

Information Technology Management Structure

The Information Technology (IT) Implementation Unit consists of the IT Strategic Planning and Development Division, IT Operation Division and Data Management Division. In addition, the Company has also established an IT Security Division which has a function in charge of handling cyber security and resilience and is independent of the IT management function. In general, the authorities and responsibilities of each Division are as follows.

1. The IT Strategic Planning and Development Division has the authority and responsibility as a Division that carries out the role of "Change the Bank" as follows:
   a. Plan, coordinate, evaluate, monitor, and control activities related to the process of formulating an Information Technology (IT) strategic plan as well as managing the information technology portfolio, Information Technology (IT) policies and application development strategies effectively and efficiently;
   b. Manage the process of developing applications to support business operations and monitoring their implementation to meet the operational needs of the Company's business;
   c. Anticipate information system risk exposure and develop appropriate and adequate countermeasures;
   d. Support the implementation of information security; and
   e. Prepare and fulfill Information Technology (IT) planning and development reports and their fulfillment in collaboration with related units.

2. The IT Operation Division has the authority and responsibility as a Division that carries out the role of "Run the Bank" as follows:
   a. Develop operational management strategies and implement and monitor Information Technology (IT) operations effectively and efficiently to maintain Information Technology (IT) service levels to support business operations;
   b. Anticipate risk exposure in the implementation of Information Technology (IT) operations, as well as develop appropriate and adequate countermeasures;
   c. Support the implementation of information security; And
   d. Compile and fulfill Information Technology (IT) operational reports in collaboration with related units.

3. The Data Management and Analytics Division has the authority and responsibility as a Division that carries out the role of "Change the Bank" and "Run the Bank" as follows:
   a. Facilitate and coordinate regarding the establishment and implementation of the roadmap and vision for the delivery and management of information; including Data Warehouse, Big Data, Business Intelligence & Analytics and Data Management to carry out the Company's strategy in developing its business;
   b. Collaborate with business unit and support leaders to implement the agreed data strategy, set strategic directions to build an organizational data management program and optimize the way the Company uses data both internally and externally;
   c. Collaborate with other Information Technology (IT) Operations Units, Security Work Units and external parties, in managing and creating an environment that makes data and information accessible with appropriate access control channels, as well as acting as an advisor in the use of data to improve performance, and formulate company strategy overall;
   d. Oversee the application of data analysis and new analytical methodologies that will serve as a guide for the company's management in formulating the company's business development strategy; and
   e. Oversee the process of gathering and reviewing data from various systems already in use, making recommendations to upgrade outdated systems and ensuring new data solutions that are timely, accurate and of high quality.

4. The IT Security Division has the authority and responsibility as a Division that carries out the role of "Secure the Bank" as follows:
   a. Design, implement and maintain a series of processes and systems that are integrated and effective in managing information security and guaranteeing the confidentiality, integrity and availability of information assets by minimizing information security risks;
   b. Prepare and fulfill reports related to information security in collaboration with related units.

Information Technology Work Plan 2025

IT Development in 2025 supported the corporation plan and aspiration of Director General Policy in 2025 is concerning to credit, quality credit, funding, office network, fee based income, and overhead burden devision. The 2025 Information Technology (IT) development plan is broadly in line with the main initiatives of the 2021-2025 Information Technology Strategy Plan (RSTI), as follows:

a. ITF001 - Agile Collaboration Tools Standardization & DevSecOps Automation
b. ITF002 - IT Organization, Capability and Capacity Boost
c. ITF003 - IT Governance Forum Enhancement
d. ITF004 - Syariah Subsidiaries Tech Enablement Strategy
e. ITF006 - IT Performance Monitoring Establishment
f. INF003 - DRC Migration
g. CHL002 - Digital Branch Features Enhancement
h. PPP003 - Open Banking Integration and Performance Monitoring Improvement
i. PMF004 - Paylater System and Product Implementation
j. UUS001 - UUS Tech Capability Enhancement
k. DAT001 - Establish Data and Artificial Intelligence Strategy
l. DAT002 - Develop Transaction Monitoring Dashboard For War Room
m. DAT004 - Expand Data Management Capabilities and Oversee Data Quality

Preparation of Information Technology Strategy Plan 2025-2029

In last 2024, in accordance to the company long term planing (RJPP) 2025 – 2029, the Company has complied and delivered the Information Technology Strategic Plan (RSTI) for 2025 -2029 to BUMN Ministry through the Letter No. 1745/DIR/ITPD/XII/2024, on December 13, 2024 concerning to deliver a BTN Information Technology Strategic Plan (RSTI) periode 2025-2029 has scoped about the Company IT Tranformation Roadmap in 2025 by focusing to core platform modernization and Information Technology (IT) architecture for supporting the scalability. The Company will do the process improvement, technology, good governance, and organization for answering the main challenge in nformation Technology (IT) Services including bellows:

a. Optimalization of security tools related to nformation Technology (IT) security process.
b. Optimalization of nformation Technology (IT) operational process related to enhancement project managements tools which concern to agile development.

In the other hands, 6 domains were adjusted on Enterprise Architecture to provide an overview of the technology and system used by the Company for reaching the Company's vision and Business Startegic which has planed, such as domain Digital Platforms, Composable Integration, Adoption of Artificial Intelligence, Data Foundation, Elastic & Resilience Infrastructure dan Cyber Resilient Reinvention.

CORPORATE GOVERNANCE



In 2024, BTN showed significant performance growth in both operational and financial terms. BTN's performance also received recognition from external parties by receiving awards on a national and international scale.



Achievements in the Implementation of Corporate Governance



BTN has successfully won another prestigious award at the TOP GRC 2024 event. This award is given to companies that have good performance and have implemented Governance, Risk, & Compliance (GRC) in managing their business. At TOP GRC 2024, BTN won four awards:

- *Top GRC Awards #5 Stars*
- *Top GRC Awards 2024 #Golden Star Trophy*
- *The Most Committed GRC Leader 2024 for BTN President Director, Nixon L.P Napitupulu*
- *The High Performing Board of Commissioners on GRC 2024*

In the future, BTN will continue to strive to implement Governance, Risk, & Compliance (GRC) in its business implementation.



1. Top 50 Issuers in the Big Capitalization Public Listed Company Category at the 15th IICD Corporate Governance Conference and Award 2024
2. Best Financial Sector Category Big Capitalization Public Listed Company at the 15th IICD Corporate Governance Conference and Award 2024





The Company has established a Business Competition Compliance Program which has been approved by the Business Competition Supervisory Commission (KPPU) on December 13, 2024. This program aims to ensure that all business processes carried out by the Company are always based on the principles of healthy business competition.



BTN won the title of Most Trusted Company in the Corporate Governance Perception Index (CGPI) 2024 as a form of implementing good corporate governance.

Fundamentals of Implementation of Corporate Governance

The implementation of GCG within the Company refers to various relevant provisions, regulations, and laws as well as GCG guidelines issued by national and international institutions. The reference basis for GCG implementation is as follows:

1. Law of the Republic of Indonesia No. 10 of 1998 concerning Amendments to Law No. 7 of 1992 on Banking.
2. Law of the Republic of Indonesia No. 40 of 2007 concerning Limited Liability Companies.
3. OJK Regulation No. 17/ POJK.03/2014 concerning the Implementation of Integrated Risk Management for Financial Conglomerates jo OJK Regulation No. 30 of 2024 concerning Financial Conglomerates and Financial Conglomerate Holding Companies.
4. OJK Regulation No. 18/POJK.03/2014 concerning the Implementation of Integrated Governance for Financial Conglomerates jo. OJK Regulation No. 30 of 2024 concerning Financial Conglomerates and Financial Conglomerate Holding Companies.
5. OJK Regulation No. 33/POJK.04/2014 concerning the Board of Directors and Board of Commissioners of Issuer or Public Company.
6. OJK Regulation No. 34/POJK.04/2014 concerning Nomination and Remuneration Committees for Issuers or Public Companies
7. OJK Regulation No. 35/POJK.04/2014 concerning Corporate Secretaries of Issuers or Public Companies
8. OJK Regulation No. 8/POJK.04/2015 concerning Websites of Issuers or Public Companies.
9. OJK Regulation No. 21/POJK.04/2015 concerning the Implementation of Guidelines for Public Corporate Governance.
10. OJK Regulation No. 31/POJK.04/2015 concerning Disclosure of Information or Material Facts by Issuer or Public Company.
11. OJK Regulation No. 55/POJK.04/2015 concerning the Establishment and Guidelines for Implementing the Work of the Audit Committee.
12. OJK Regulation No. 56/POJK.04/2015 concerning the Establishment and Guidelines for Preparing the Internal Audit Unit Charter.
13. OJK Regulation Number 60/POJK.04/2015 concerning Disclosure of Information on Certain Shareholders
14. OJK Regulation No. 5/POJK.03/2016 concerning Bank Business Plans.
15. OJK Regulation No. 29/POJK.03/2016 concerning Annual Reports of Issuers or Public Companies.
16. OJK Regulation No. 11/POJK.03/2016 concerning Ownership Reports or Any Changes in Ownership of Public Company Shares.
17. OJK Regulation No. 15/POJK.03/2019 concerning Plans and Organizing General Meetings of Shareholders of Public Companies.
18. OJK Regulation No. 16/POJK.03/2019 concerning Implementation of Electronic General Meetings of Shareholders of Public Companies.
19. OJK Regulation No. 17/POJK.03/2019 concerning Material Transactions and Changes in Business Activities.
20. OJK Regulation No. 42/POJK.03/2019 concerning Transparency and Publication of Bank Reports.
21. OJK Regulation No. 17 of 2023 concerning Implementation of Governance for Commercial Banks.
22. OJK Regulation No. 2 of 2024 concerning the Implementation of Governance for Sharia Commercial Banks and Sharia Business Units.
23. OJK Circular Letter No. 14/SEOJK.03/2015 concerning the Implementation of Integrated Risk Management for Financial Conglomerates.
24. OJK Circular Letter No. 15/SEOJK.03/2015 concerning the Implementation of Integrated Governance for Financial Conglomerates.
25. OJK Circular Letter No. 32/SEOJK.04/2015 concerning Public Company Governance Guidelines.
26. OJK Circular Letter No. 25/SEOJK.03/2016 concerning Commercial Bank Business Plans.
27. OJK Circular Letter No. 43/SEOJK.03/2016 concerning Transparency and Publication of Conventional Commercial Bank Reports.
28. OJK Circular Letter No. 13/SEOJK.03/2017 concerning Implementation of Governance for Commercial Banks.
29. Regulation of the Minister of State for State-Owned Enterprises (BUMN) Number PER-1/MBU/03/2023 dated March 3, 2023 concerning Special Assignments and Social and Environmental Responsibility Programs of State-Owned Enterprises.
30. Regulation of the Minister of State-Owned Enterprises Number PER-2/MBU/03/2023 concerning Guidelines for Governance and Significant Corporate Activities of State- Owned Enterprises.
31. Regulation of the Minister of State-Owned Enterprises (BUMN) Number PER-3/MBU/03/2023 dated March 3, 2023 concerning Organs and Human Resources of State-Owned Enterprises.
32. The Company's Articles of Association as last amended by the Deed of Statement of Resolutions of the Annual General Meeting of Shareholders Number 8 dated March 6, 2024 which had been ratified by the Minister of Law and Human Rights of the Republic of Indonesia based on the Decree of the Minister of Law and Human Rights of the Republic of Indonesia Number AHU-0022194.AH.01.02.TAHUN 2024 dated April 5, 2024;

In addition to that, the Company also adopts the best governance standards regionally and internationally applicable as best practices and improves the GCG implementation, including:

1. Principles of Good Corporate Governance, issued by the Organization for Economic Cooperation and Development (OECD).
2. ASEAN Corporate Governance Scorecard issued by ASEAN Capital Market Forum (ACMF).
3. Indonesian GCG Guidelines (PUGKI) developed by the National Committee on Governance Policy (KNKG).
4. *Principles for Enhancing Corporate Governance issued by Basel Committee on Banking Supervision.*

Objectives and Principles of Implementation of Governance

The Company is fully aware that the business continuity of a business entity is not merely measured by financial performance and increased profits, but also through internal management of the Company, including the implementation of effective GCG. Thus far, the Company has implemented the GCG principles with the purpose and belief that it will ensure the construction of comprehensive business balance so that all forms of interest, both business and social, individuals and groups, internal as well as external, short and long-term as well as the shareholders and stakeholders interests will reach the balance point. The implementation of GCG principles is highly necessary in order to build a more resilient Company to be able to survive in dealing with fiercer competition. The Company keeps striving to follow the development of the best GCG practices at the national, regional, and international levels that are relevant and certainly adapted to the needs.

The implementation of corporate governance serves purposes as follows:

1. Supporting the Company's vision, namely "Being Best Mortgage Bank in Southeast Asia in 2025".
2. Improving the Company's mission, including:
   a. Actively supporting the government in advancing the welfare of the Indonesian people through home ownership.
   b. Realizing millions of Indonesians dream of owning a decent house to live.
   c. Becoming the home of Indonesia's best talent.
   d. Increasing shareholder value by focusing on sustainable profitability growth as a blue chip company with strong risk management principles.
   e. Becoming a financial partner for stakeholders in the housing ecosystem by providing comprehensive solutions and the best services through digital innovation.
3. Providing added benefits and values for shareholders and stakeholders.
4. Maintaining and improving sound and competitive business continuity in the long term (sustainable).
5. Enhancing investors' trust in the Company.

The implementation of GCG is carried out based on the five principles contained in Regulation of the Minister of SOEs No. PER-2/MBU/03/2023 concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises.

TRANSPARENCY

Transparency is openness in carrying out the decision-making process and openness in disclosing material and relevant information about the company.

ACCOUNTABILITY

Accountability is clarity of function, implementation, and organizational responsibility so that company management is carried out effectively.

RESPONSIBILITY

Responsibility is the conformity in company management with the provisions of laws and regulations and good corporate principles.

INDEPENDENCE

Independence or self-reliance is a condition in which a company is managed professionally without Conflict of Interest and influence/pressure from any party that is not in accordance with the provisions of laws and regulations and good corporate principles.

FAIRNESS
It is justice and equality in fulfilling the rights of stakeholders that arise based on agreements and provisions of laws and regulations.

These five principles are in accordance with the pillars of corporate governance based on the General Guidelines for Indonesian Corporate Governance (PUGKI).

GCG is a facility used by the Company's organs to improve their business success and accountability so as to realize the shareholders' value in the long term while considering the other stakeholders' interests, in accordance with the applicable laws and regulations, and business ethics. The greater the risks, the implementation of good corporate governance in the Company becomes more essentially required.

In addition, GCG is a continuous effort to respond proportionally to the needs of the GCG implementation in order to achieve the goal of Moving Beyond Corporate Governance to True Business Value. The Company has become a proud state-owned Bank and participates in realizing the progress and prosperity of the nation. In doing so, the Company always manages every business activity professionally and adheres to the GCG principles. To achieve the goals, the Company begins with integrating its human capital with reliability, professionalism, integrity, and good manners.

Commitment on Corporate Governance Implementation

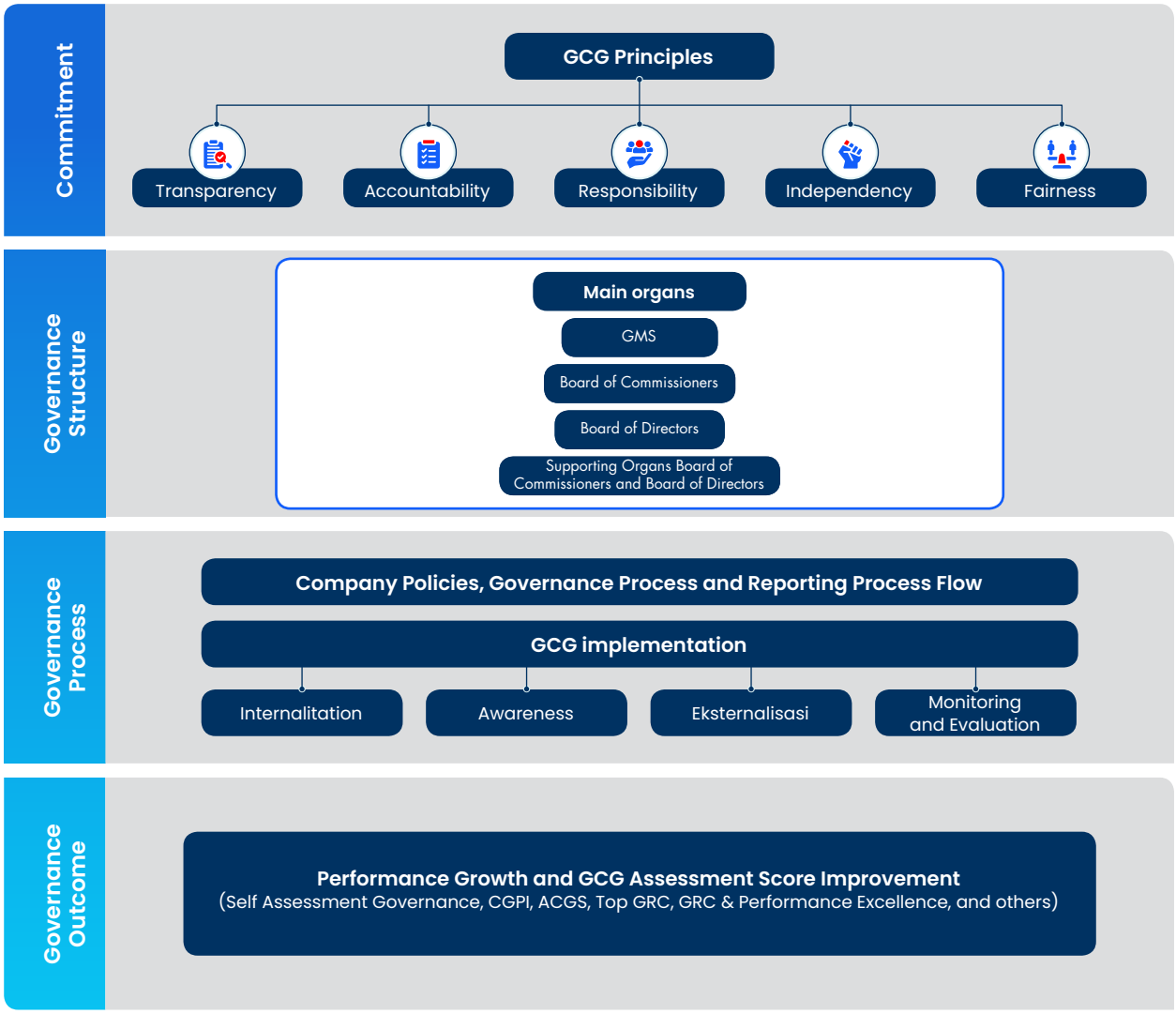
The Company always strengthens its commitment to implement and uphold GCG principles consistently in the daily course of business activity, comply with all applicable regulations and legislation, and is always open to improvements in accordance with best practices to suit the goals, vision, and the Company's mission, and create added value for the Company for Shareholders and other stakeholders.

The implementation of good corporate governance (GCG) is an important indicator for shareholders to assess the Company's performance and believe that the Company has been well-managed and is can protect the interests of all shareholders. PT Bank Tabungan Negara (Persero) Tbk. as a State-Owned Enterprise (BUMN) and also a public company, commits to continuously improve the implementation of good corporate governance in order to understand the expectations of each shareholder.

Corporate Governance Implementation

Govenance Framework

Implementation of Corporate Governance can be seen from the alignment of 3 (three) aspects of the governance system, such as governance structure, governance process, and governance outcome. The three aspects of the governance system have been wellimplemented by the Company.



Governance structure is the sufficiency of the Corporate Governance structure and infrastructure so that the process of implementing Corporate Governance principles produces outcomes that are in line with the expectations of the Company's Stakeholders. The governance organ structure includes the Board of Commissioners, Directors, Committees, and Company Work Units. Meanwhile, the Governance infrastructure includes policies and procedures, management information systems, and the main tasks and functions of each organizational structure. Governance process is an activity to implement governance in the Company which is supported by a structured system and optimal monitoring process. Then, Governance outcome is the result of implementing adequate governance structures and governance processes.

Commitment on Governance

The Company is committed to continuously evaluate, improve, increase, and enhance GCG implementation, so that it is in line with developments in laws and regulations and the latest business conditions. In addition, each internal policy of the Company contains an obligation to be reviewed periodically by the Board of Commissioners and/or the Board of Directors in accordance with the provisions of each policy. The Company's GCG commitment is embedded in the Company's vision and mission, core values, and business policy strategies, which are translated into the following fundamental elements of the Company's business, as follows:

Vision and mission
The Company has a vision that reflects the goal to be achieved, namely Best Mortgage Bank in Southeast Asia 2025. To achieve this goal, the Company has described the goal into several missions. The Vision and Mission are explained in detail in the Chapter of Company Profile.

Company Core Values
In line with efforts to strengthen basic foundations and build cultural momentum, corporate culture transformation is performed by increasing understanding and capability in implementing AKHLAK to achieve sustainable growth. In accordance with the AKHLAK core values, the main behavior of BTNers can be classified into 8 (eight) main points, as follows:

1. Adhering to and complying with the moral values and business ethics and applicable regulations;
2. Continuously learning and improving competency;
3. Discipline, consistent and thorough in completing tasks with the best quality of performance;
4. Mutually respectful, appreciating, and open to differences;
5. Responsible and always putting the Corporate's interest ahead;
6. Proactive, effective, and efficient to satisfying customer needs;
7. Responsive towards changes and providing opportunity for continuous improvements.;
8. Open to competition that delivers added value.

Guidelines for the Board of Commissioners and Directors
The Company has Guidelines for the Board of Commissioners and Directors, containing as follows:

1. Organization of the company and assignment of tasks;
2. Duties, responsibilities, and authority;
3. Work ethics;
4. Meeting arrangements;
5. Prohibition against the Board of Commissioners and Directors;
6. Evaluation of the performance of the Board of Directors;
7. Pattern of working relationship between the Board of Directors and the Board of Commissioners.

These guidelines are used as a reference for the Board of Commissioners and Directors in performing their duties to achieve the Company's business objectives. The Guidelines for the Board of Commissioners and Directors are explained more clearly in the respective Sub-Title of the Board of Commissioners and Directors in the Chapter of Corporate Governance.

Code of Ethics
The Company has drafted the Company's Code of Ethics as a guideline on business ethics, work ethics, and BTNers' code of conduct in implementing good corporate governance practices, including interacting with stakeholders. The Company's Code of Ethics applies to BTNers at all levels of the organization. The Code of Ethics is clearly explained in the Code of Ethics' Sub-Heading in the Corporate Governance Chapter.

Social and Environmental Responsibility
The Social and Environmental Responsibility Program (TJSL) is an activity that is the Company's commitment to sustainable development. This is performed by providing economic, social, environmental, legal, and governance benefits with more integrated, focused, measurable impact principles and can be accountable for and are part of the company's business approach. Specifically, Social and Environmental Responsibility is detailed in the Chapter of Social and Environmental Responsibility Program.

Business Competition Compliance Program
The Business Competition Compliance Program is a series of activities that demonstrate efforts to comply with the principles of sound business competition. It is performed with the aim of encouraging the Company to comply with the principles of sound business competition, as stipulated in Law Number 5 of 1999 concerning the Prohibition of Monopolistic Practices and Non-Sound Business Competition. The Business Competition Compliance Program is completely described in the Compliance Function Sub-Chapter.

ISO 37000:2021 Implementation Plan on Governance of Organizations
The Company is also committed to implementing corporate governance with plans to adopt ISO 37000:2021 Governance of Organizations which aims to create added value and sustainability for the organization.

Governance Structure

The Law of Limited Liability Company No. 40 of 2007 states that the Company's Organs consist of the General Meeting of Shareholders, Directors and Board of Commissioners. The GMS, Directors and Board of Commissioners respect each other's duties, responsibilities and authorities in accordance with regulations and the Articles of Association. The Company's organs are established to ensure that the implementation of corporate governance principles can perform effectively with clear roles and responsibilities so it creates a check and balance control mechanism. In detail, the Governance structure and mechanisms are explained in the Sub-Chapter of Corporate Governance Structure and Mechanism.

Governance Process

Governance Process The Governance Process conducted by the Company is by corporate organs and lower levels in performing their functions and duties in realizing commitment and governance structure in order to achieve governance results that are in accordance with Governance principles. The Company's Governance Process includes as follows:

1. Implementation of the General Meeting of Shareholders (GMS)
2. Implementation of the Functions, Duties and Responsibilities of the Board of Commissioners and Directors
3. Implementation of Business Process Improvement (BPI) and Company Business Activities
   a. Bank has adjusted the company's organizational structure after the 2024 AGM by considering the composition and nomenclature of the Board of Directors, the formation of SEVP and new Divisions.
   b. Development of the Commercial Banking Division (CMBD) organizational structure for non-housing management in order to achieve targets and diversify the guideline portfolio as well as business development and partnerships for the expansion of the Commercial Banking Center (CBC) business.
   c. Adjustment of business processes in the Retail Funding Division (RFD) based on retail funding segmentation to focus more on customer centric and clarify accountability.
   d. Separation of Digital Banking work units that focus on sales, namely the Digital Banking Sales Division (DBSD) and the Digital Banking Product Development Division (DBPD) in order to improve Digital Banking capabilities.
   e. Separation of Institutional Funding into Large Institutional Funding (LIFD) and Mid Size Institutional Funding (MIFD) which focus on Liquidity Buffer Customers and non-Liquidity Buffer Customers.
   f. Development of Sharia Division (SHAD) organizational structure to strengthen Sharia business and IT.
   g. Separation of functions in Operation Banking into two, consisting of Central Operations Division (CEOD) for managing basic operational functions and Digital Operations Division (DGOD) for managing business operations and business transactions.
   h. Separation of Risk Management function into Digital & Operations Risk Management Division (DORD) and Enterprise & ESG Management Division (ERMD), where Digital & Operations Risk Management Division (DORD) manages digital risk and operational risk while Enterprise & ESG Management Division (ERMD) manages enterprise risk and ESG management.
   i. Addition of personal data protection management function in Compliance Work Unit in the form of Data Privacy Department.
   j. Establishment of Regional Digital Banking Retail in Regional Office as a strategy to strengthen digital product sales.
   k. Implementation of BPI Kring (National) which includes changes in business processes through the Regional Loan Processing Center (RLPC).
   l. Implementation of the National Phase 1 Decision Engine as a loan decision tool.
   m. The SME KUR BTN Laku business process has been scaled up in all Regional Offices.
   n. Implementation of the end-state phase for the SMSE Process Center (SPU) in the cities of Medan, Palembang, Banjarmasin, Balikpapan, Makassar, Depok, Cirebon, and Ciputat.
   o. Formation of an anti-fraud sub-committee under the Risk Management Committee to accelerate the process of reporting and handling fraud incidents.
4. Social and Environmental Responsibility

Governance Outcome

1. GCG Assessment (BI/OJK) based on self-assessment results with a composite score of rank 2.
2. GCG Third Party Assessment (CGPI, ACGS, Top GRC, and others).
3. The 2022 Governance Report.
4. Sustainable growth in financial performance.
5. Establishment of a sustainable integrity system.

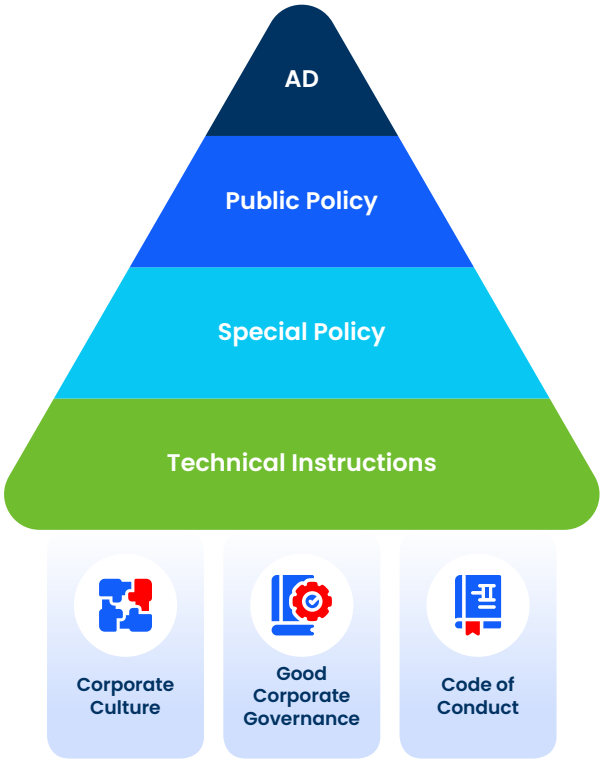
Improvements in Guidelines and Governance of Preparation of Policies

The Company through decision of Board of Directors makes changes of Policy Architecture and Procedures of Bank BTN, effectively prevailing since February 2,

2022. It purposes to improve governance and internal regulations so that those will be more well-organized, not overlapping, effective, and facilitating employees in using the guidelines of daily operational implementation. The company has developed a special policy number KK.9.A dated March 22, 2022 regarding Procedures for Governance of Bank Internal Regulations with due observance of the following principles:

1. Ease and Clarity
2. Efficiency and Effectiveness
3. Aligned
4. Measurable
5. Dynamic
6. Oriented to the user or the party being served
7. Legal Compliance
8. Legal Certainty

In order to strengthen governance aspects and eliminate overlapping regulations and make it easier for employees to carry out daily operational activities, the Company needs to carry out transformations, one of which is in the form of internal regulatory transformation. The intended transformation of internal regulations is realized in the form of implementing the Internal Regulatory Architecture as follows:



All existing Internal Regulations with old Policy and Procedure Architecture have been transformed into the New Policy and Procedure Architecture with the following details:

1. 10 (Ten) General Policies have been issued which have become Umbrella Policies for all Company operational activities.
2. 153 (one hundred and fifty three) Special Policies (KK) have been issued which are derivative regulations from General Policies.
3. 280 (two hundred and eighty) Technical Instructions have been issued which are derivative regulations from Special Policies.

Additionally, the Company has also revoked existing internal regulations that were invalid or not applied. In this transformation of Internal Regulations, The Company also uses a digital platform as a means of disseminating the latest Internal Regulations that can be accessed by employees, such as by the PPDigital application. The existence of PPDigital will ease employees to obtain information about the latest Internal Regulations and those matters related to the work and activities of the said employees.

Improvement of Governance Regulation

In 2023, the Company has drafted and renewed the following policies, as follows:

1. General Policy Number KU.6 dated December 5, 2022 concerning Law, Compliance, AML & CFT and Corporate Governance as updated on December 20, 2024.
2. Special Policy Number KK.6-F dated August 28, 2023 concerning Good Corporate Governance Procedures as updated on July 30, 2024.
3. Special Policy Number KK.6-H dated October 10, 2023 concerning Conflict of Interest Management Procedures as updated on December 17, 2024.
4. Technical Instruction Number PT.6-F.1 dated September 15, 2023 concerning Good Corporate Governance Assessment as updated on March 26, 2024.
5. Technical Instruction Number PT.6-A.1 dated April 25, 2022 concerning the Implementing Instructions for Gratification Control as updated on June 28, 2024.
6. Special Policy Number KK.6-J dated December 2, 2024 concerning Business Competition Compliance Procedures.
7. Joint Decree of the Board of Commissioners Number 01/SKPB/KOM/BTN/2024 and the Board of Directors Number SKPB-01/DIR/BTN/2024 concerning the Guidelines for Code of Conduct of PT Bank Tabungan Negara (Persero) Tbk.

Improvement of the Work Procedure Guidelines for the Board of Commissioners and Directors

1. Guidelines and Work Rules of the Board of Commissioners Number 18/KOM/BTN/2024 dated December 18, 2024 concerning the Guidelines and Work Rules of the Board of Commissioners of PT Bank Tabungan Negara (Persero) Tbk.

2. Guidelines and Work Procedure of the Board of Directors through Special Policy Number KK.6-G dated September 12, 2023 concerning Guidelines and Work Procedures of the Board of Directors.

Improvement of the Board of Commissioners Committee Charter and the Board of Directors Committee Policy

1. Charter of the Committee under the Board of Commissioners
   a. Audit Committee Charter Number 19/KOM/BTN/2024 concerning the Guidelines and Work Procedures of the Audit Committee.
   b. Remuneration and Nomination Committee Charter Number 20/KOM/BTN/2024 dated December 18, 2024 dated December 13, 2023 concerning the Guidelines and Work Procedures of the Remuneration and Nomination Committee of PT Bank Tabungan Negara (Persero) Tbk.
   c. Risk Monitoring Committee Charter Number 21/KOM/BTN/2024 dated December 18, 2024 concerning the Guidelines and Work Procedures of the Risk Monitoring Committee.
2. Board of Directors Committee Charter
   Special Policy Number KK.9-D dated March 30, 2023 concerning the Procedures of the Board of Directors Committee Governance as updated on July 22, 2024.

Certification and Surveillance of ISO 37001:2016 Anti-Bribery Management System

Furthermore, to maintain the ISO 37001:2016 Anti-Bribery Management System (SMAP) certificate in the scope of ISO 37001:2016 SMAP Surveillance, the ISO 37001:2016 SMAP Certification Body has conducted a surveillance audit. On October 7-11, 2024, the Company successfully maintained the SMAP certification in the scope of procurement of goods and/or services in the Procurement and Fixed Asset Management Division (PFAD), Commercial credit in the Commercial Banking Division (CMBD Head Office), Corporate Banking Division (CBD), Wholesales Credit Risk Division (WRD), Commercial Banking Center (Jakarta Raya, Bekasi, Bandung, Bintaro Jaya), SME Restructuring (West Java Regional Office, Jakarta II Regional Office, East Java Bali Nusra Regional Office, Sumatra Regional Office, Sulawesi Maluku Papua Regional Office, Central Java DIY Regional Office), and Small Medium Enterprise Banking Division (SMBD). In addition, the Company expanded the scope by adding (extend scope) ISO 37001:2016 Anti-Bribery Management System (SMAP) in the scope of Credit Operation Division (COD). Then, the Company always commits to continuous improve the implementation in order to realize a Company free from corruption, collusion and nepotism in accordance with the principles of good corporate governance (GCG).

Strengthening the Implementation of FSA Guidelines and ASEAN CG SCORECARD

The improvement of the quality of governance by implementing the ASEAN CG Scorecard is performed in accordance with the mandate of OJK Regulation No. 21/POJK.04/2015 and SEOJK No. 32/SEOJK.04/2015 as well as international governance best practices. The issuance of a number of new OJK Regulations during 2022 has been an aspect of compliance that is always maintained by the Company. Those are related to POJK No. 12/POJK.03/2021 concerning Commercial Banks, POJK No. 13/POJK.03/2021 concerning the Implementation of Commercial Bank Products, and POJK No. 14/POJK.03/2021 concerning Amendments to POJK No. 34/POJK.03/2018 concerning Reassessment of the Main Parties of Financial Services Institutions and OJK Circular Letter No. 16/SEOJK.04/2021 concerning the Form and Content of Annual Reports of Issuers or Public Companies.

Zero Tolerance to Fraud & Zero Defect Program

The Company has implemented fraud risk management through the implementation of 4 (four) anti-fraud strategy pillars, namely prevention, detection, investigation, reporting sanctions and monitoring, evaluation and follow-up.

Integrated Governance, Risk and Compliance (IGRC) Implementation Initiative)

The Company has developed a Governance, Risk, and Compliance 2025-2029 roadmap designed to strengthen the organization's ability to meet regulatory requirements, manage risks effectively, and ensure good corporate governance. This initiative integrates governance oversight, risk management, and compliance processes to support sustainable business growth and operational resilience. Furthermore, we outline several processes in the development of the GRC Roadmap, as below:

a. BTN Corplan 2025-29 Highlight.
b. Diagnostic & GAP Analysis
c. SWOT Analysis Results and Key Watchout-Strategy Design
d. Strategic Postures & Diagnostic Result.
e. Priority Matrix of GRC Strategic Initiatives
f. Timelines

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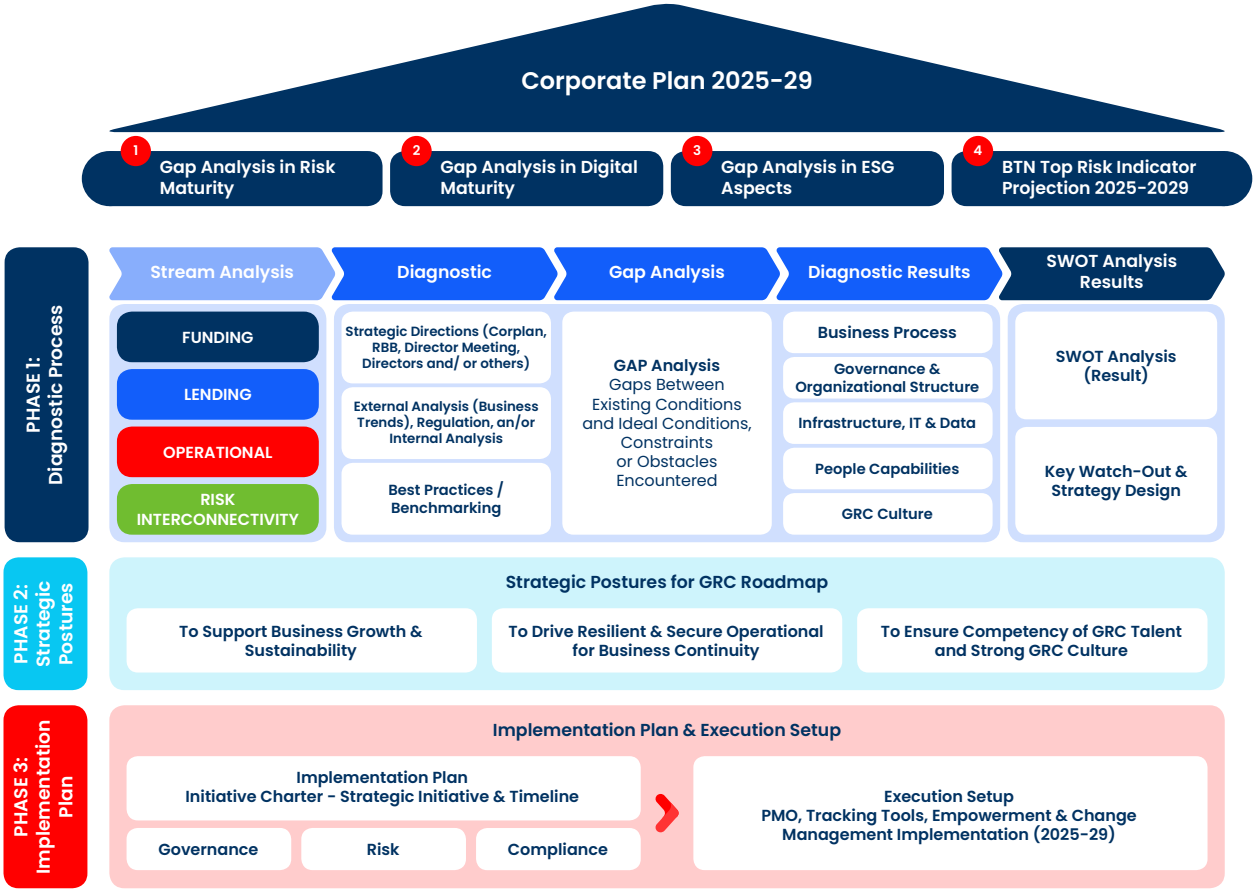


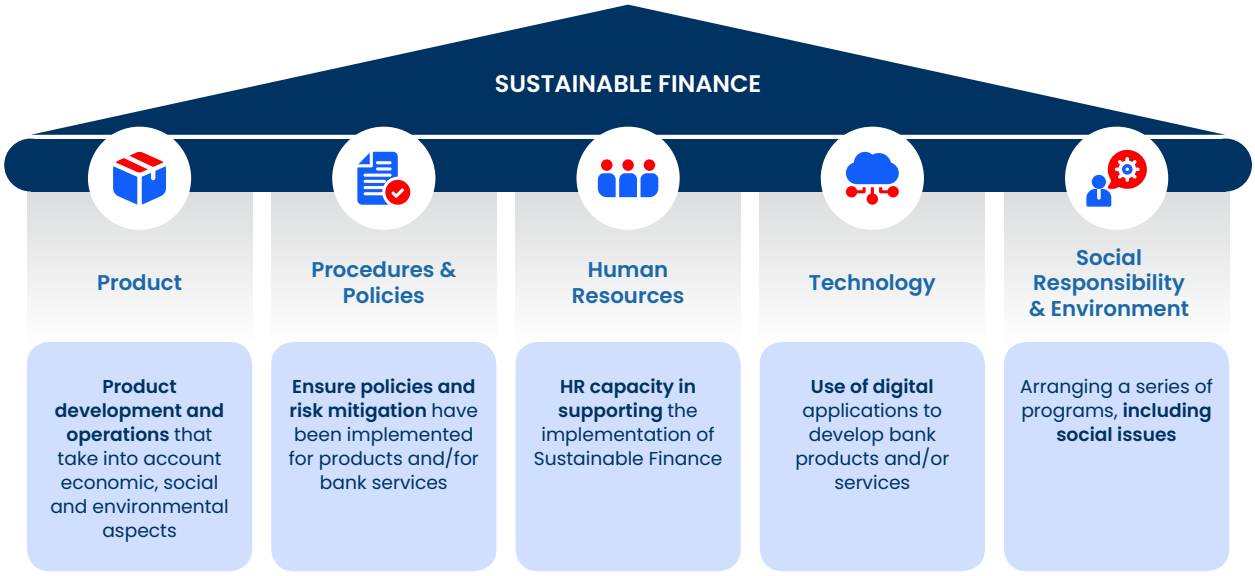
The key focus and design strategies identified in the GRC Roadmap include::

1. The development of Asset & Liability Risk Management Framework & System for Profit Stability, Risk/Return Optimization, and Capital Efficiency.
2. The Acceleration of sustainable growth through scaling up ESG initiatives by integrating environmental, social, and governance principles into the company's core operations, strategy, and GRC framework based on the ESG Rating Gap.
3. Establishing Integrated Governance including Risk Management within the financial conglomerate structure to strengthen the Bank's business ecosystem through the establishment of subsidiaries.
4. Towards Zero Manual Processes for Operational Efficiency through decision making automation, paperless and Building Advanced Risk Management Model.
5. Boosting Operational Resilience to Support Business Growth.



This roadmap positions the organization to proactively manage risk, comply with evolving regulations, and ensure a governance structure that drives sustainable growth..

The achievements of the 2024 Sustainable Finance Program for the implementation of BTN's RAKB are formulated into 5 (five) pillars of sustainable finance, namely:

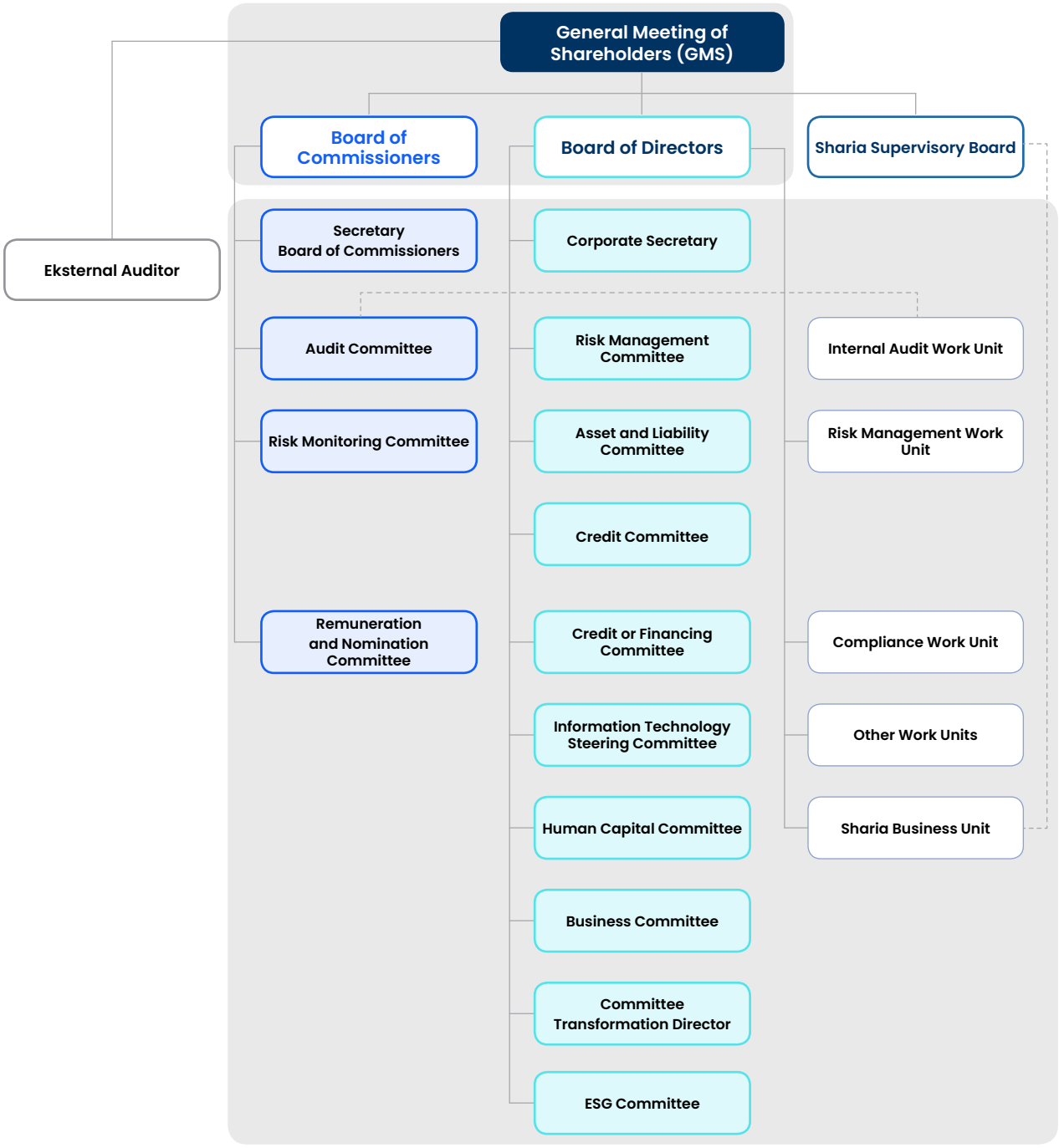




Corporate Governance Structure and Mechanism

Company Organ Structure

Republic of Indonesia Law Number 40 of 2007 on Limited Liability Companies stipulates that the Organ of the Company consists of a General Meeting of Shareholders, the Board of Directors, and the Board of Commissioners. General Meeting of Shareholders, the Board of Directors, and the Board of Commissioners mutually respect duties, responsibilities, and authorities in accordance with regulations of the Article of Association. The organ of the Company is established to assure the effective implementation of corporate governance principles with clear roles and responsibilities so as to create a control mechanism of check and balance.



Governance Soft Structure

In terms of improving the quality and coverage of the implementation of sustainable governance, the Company drafts and applies a governance soft structure regulating the relationship between organs in the Company; hence, duties, responsibilities, and authorities of each organ are clear in accordance with the provisions of applicable regulations, GCG principles, healthy business ethics, or best practices. The governance soft structure of the Company is a policy structure used as framework and governance in policy drafting as well as the implementation of the Company's activities, including:

1. The Company Articles of Association as last amended by the Deed of Statement of Resolutions of the Annual General Meeting of Shareholders Number 8 dated March 6, 2024, which had been ratified by the Minister of Law and Human Rights of the Republic of Indonesia based on the Decree of the Minister of Law and Human Rights of the Republic of Indonesia Number AHU-0022194.AH.01.02.TAHUN 2024.
2. Working Relationship Governance of the Board of Commissioners and Directors as ratified in the Joint Agreement Letter of the Board of Commissioners No. 01/SKB/KOM/BTN/2024 and the Board of Directors No. SKB-01/DIR-BTN/2024.
3. GCG Guidelines as ratified in Special Policy No. KK.6-F dated August 25, 2023 concerning Good Corporate Governance Procedures as updated on December 12, 2023.
4. Guidelines and Work Procedures of the Board of Commissioners as ratified in the Decree of the Board of Commissioners No. 18/KOM/BTN/2024 as an update to the Board Manual which was the previous guideline and work regulations.
5. Guidelines and Manual of Board of Directors through Special Policy No. KK.6-G, about Guidelines and Manual of Board of Directors.
6. Audit Committee Charter Number 19/KOM/BTN/2024 concerning the Guidelines and Work Procedures of the Audit Committee.
7. Remuneration and Nomination Committee Charter Number 20/KOM/BTN/2024 concerning the Guidelines and Work Procedures of the Remuneration and Nomination Committee of PT Bank Tabungan Negara (Persero) Tbk.
8. Risk Monitoring Committee Charter Number 21/KOM/BTN/2024 concerning the Guidelines and Work Procedures of the Risk Monitoring Committee.
9. Special Policy No. KK.9-D concerning Governance Procedures of the Board of Directors Committee.
10. Special Policy No. KK.6-A concerning Procedures of Gratification Control and Technical Instructions No. PT.6-A.1, concerning Procedures for Implementing the Gratification Control.
11. Joint Decree of the Board of Commissioners Number 01/SKPB/KOM/BTN/2024 and the Board of Directors Number SKPB-01/DIR/BTN/2024 concerning the Guidelines for Code of Conduct of PT Bank Tabungan Negara (Persero) Tbk.
12. Special Policy Number KK.6-H concerning Procedures for Conflicts of Interest Management.
13. Guidelines for Managing the Whistle Blowing System through Technical Instruction Number PT.7-B.2 concerning the Management of the Whistleblowing System.
14. General Policy Number KU.6 concerning Law, Compliance, AML & CFT and Corporate Governance.
15. Special Policy Number KK.6-F d concerning Good Corporate Governance Procedures.
16. The update of KK No. KK.6-E concerning Procedures for Implementing Anti-Bribery Management System (ISO 37001:2016).
17. Technical Instructions No. PT.6-F.1 about Governance Assessment of Good Corporate Governance.
18. The update of technical instructions No. PT.6-E.1 concerning Procedures for implementing Anti-Bribery Management System (ISO 37001: 2016).

Corporate Governance Mechanism

Shareholders

As one of the State-Owned Enterprises under a public company status, the largest shareholder of the Company is the Republic of Indonesia (60%), which places the Republic of Indonesia as the Controlling Shareholder. In addition, the Republic of Indonesia also has 1 (one) Series A Dwiwarna Share, which provides its holder special rights that are not owned by other shareholders and, at the same time, as a Controlling Shareholder. Moreover, 40% of the Company's shares are owned by the public.

Shareholders' Rights

The Company owns 2 (two) types of shares, namely Series A Dwiwarna Shares and Series B Shares, with a nominal value of IDR 500.00 (five hundred rupiah) per share. Series A Dwiwarna Shareholder is the controlling shareholder and has privileges with the following rights and authorities:

Special Rights and Authorities of Series A Dwiwarna Shareholders

1. The right to approve in the GMS for the following issues:
   a. Approval for amendments to the Articles of Association.
   b. Approval for Capital changes.
   c. Approval for the appointment and dismissal of members of the Board of Directors and the Board of Commissioners.
   d. Approval regarding merger, consolidation, acquisition, separation, and dissolution.
   e. Approval for remuneration for members of the Board of Directors and Board of Commissioners.
   f. Approval for assets transfer based on the Articles of Association that requires GMS approval.
   g. Approval for participation and reduction in the percentage of equity participation in other companies based on the Articles of Association that requires the GMS approval.
   h. Approval for the use of profits.
   i. Approval for non-operational long-term investment and financing based on the Articles of Association that requires the GMS approval.
2. The right to nominate candidates for members of the Board of Directors and the Board of Commissioners.
3. The right to propose the GMS agenda.
4. The right to request and access Company data and documents. Apart from the privileges of Series A Dwiwarna Shareholders, as long as the Company's Article of Association does not specify otherwise, the Series A Dwiwarna Shareholder and the Series B Shareholder have the same rights.

Equal Rights for Series A Dwiwarna Shareholders and Series B Shareholders

1. The right to attend, provide opinions, and vote in the GMS based on one share; the holder is entitled to cast 1 (one) vote, included in the determination of the remuneration of the Company's Board of Directors and Board of Commissioners.
2. The right to obtain information regarding the Company in a timely, accountably, and orderly manner unless for matters of a confidential nature.
3. The right to receive a share of the Company's profits intended for Shareholders in the form of dividends and other profit sharing, in proportion to the number of shares owned.
4. The right to obtain a comprehensive explanation and accurate information on the GMS procedures requirements Perseroan with the mechanism for exercising the said rights in accordance with the provisions in the Articles of Association and statutory regulations
5. In the event that there is more than one type and classification of shares in the Company, each shareholder has the right to vote according to the type, classification, and a number of shares owned, and each shareholder has the right to be treated equally based on the type and classification of shares owned.
6. The right to transfer, release rights or issue a guarantee for debts from all or most of the Company's assets that are more than 50% of the total value of the Company's net assets, either in one separate or several interconnected transactions; the Board of Directors is required to obtain GMS approval.
7. The right to propose agenda items for the GMS including proposing candidates for members of the Board of Directors and/or candidates for members of the Board of Commissioners with the condition that 1 (one) or more shareholders representing 1/20 (one twentieth) or more of the total number of shares issued by the Company with valid voting rights.

General Meeting of Shareholders

Process of GMS and Voting Mechanism

The holding of the Company's GMS refers to the Limited Liability Company Law and OJK Regulation Number 15/POJK.04/2020, regarding the Plan and Implementation of the General Meeting of Shareholders of a Public Company and the Company's Articles of Association. The stages of holding the GMS are as follows:



To provide opportunities for individual and institutional shareholders to participate actively in using their rights as shareholders, the Company makes announcements and summons for the GMS within their respective time periods, at least through the Stock Exchange website, the e-GMS provider website, and the website Company website in Indonesian and English. The Company is obliged to determine the place and time for holding the GMS. The place where the GMS is held must be in the territory of the Republic of Indonesia, that is, it can be held in:

1. The Company's office;
2. The Company's business unit;
3. The provincial capital of the domicile or place of the Company's main business activities; or
4. The province of the Stock Exchange where the Company's shares are listed.

GMS Chairperson

The GMS is led by the Chairperson of the GMS with the following conditions:

1. The leader of the GMS is a member of the Board of Commissioners appointed by the Board of Commissioners.
2. In the event that all members of the Board of Commissioners are absent or unable to attend, the GMS shall be chaired by a member of the Board of Directors appointed by the Board of Directors.

3. In the event that all members of the Board of Commissioners or members of the Board of Directors are absent or unable to attend, the GMS shall be chaired by the shareholders present at the GMS appointed from and by the GMS participants.
4. In the event that a member of the Board of Commissioners appointed by the Board of Commissioners to chair the GMS has a conflict of interest with the agenda to be decided at the GMS, the GMS shall be chaired by another member of the Board of Commissioners who has no conflict of interest appointed by the Board of Commissioners.
5. In the event that all members of the Board of Commissioners have a conflict of interest, the GMS shall be chaired by a member of the Board of Directors appointed by the Board of Directors.
6. In the event that one of the members of the Board of Directors appointed by the Board of Directors to lead the GMS has a conflict of interest on the agenda to be decided at the GMS, the GMS shall be chaired by a member of the Board of Directors who does not have a conflict of interest.
7. In the event that all members of the Board of Directors have a conflict of interest, the GMS shall be chaired by a noncontrolling shareholder who is elected by the majority of the other shareholders present at the GMS.
8. The Chairperson of the GMS has the right to request that those present prove their authority to attend the GMS and/or request power of attorney to represent the shareholders. The power of attorney can be accessed through the Company's website in the Investor Relations - GMS - Invitation section.

Attendance of Shareholders at the GMS

1. Shareholders who are entitled to attend the GMS are Shareholders whose names are registered in the Company's Shareholders' Register as of the date stated in the GMS announcement.
2. Shareholders who are entitled may be represented by other Shareholders or other persons based on a power of attorney.

GMS Quorum

Based on Article 26 of the Articles of Association, the quorum of attendance and resolutions of the GMS on matters that must be decided at the Meeting are carried out by following the provisions:

1. Attended by shareholders representing more than ½ (one half) of the total shares with valid voting rights and the decision is valid if approved by more than ½ (one half) of the total shares with valid voting rights unless the Law and/or Articles of Association stipulates a larger quorum.
2. In the event that the quorum of attendance is not achieved, then the second GMS is valid and has the right to make binding decisions if attended by shareholders representing at least ⅓ (one third) of the total number of shares with valid voting rights and the resolution is valid if approved by more than ½ (one half) of the total number of shares with voting rights present at the meeting unless the Law and/or Articles of Association stipulates a larger quorum.
3. If the quorum of attendance at the second GMS is not reached, the third GMS may be held provided that the third GMS is valid and has the right to make decisions if attended by shareholders of shares with valid voting rights in the quorum of attendance and the decision-making requirements set by FSA upon request of the Company.

The quorum as referred to in the item above adjusts the GMS agenda as stipulated in the applicable laws and regulations and the Company's Articles of Association.

Procedures of GMS Question and Answer

In discussing each GMS agenda item, the Chair of the Meeting will provide the Eligible Shareholders or their proxies with the opportunity to submit questions/opinions/suggestions in writing before voting is held and after discussion of the GMS agenda items.

Procedure to be followed:

1. The Chairman of the Meeting will provide the Eligible Shareholders or their authorized proxies with the opportunity to ask questions, express opinions and/or submit suggestions. At each question and answer session, 3 (three) Eligible Shareholders or their authorized proxies will be given the opportunity to submit written questions/opinions/ suggestions. By considering the questions/opinions/ suggestions that have been submitted, the Meeting Chair can limit the number of questions/opinions/suggestions submitted.
2. Only Entitled Shareholders or their authorized proxies have the right to ask questions, express opinions and/or submit suggestions.
3. Entitled Shareholders or their authorized proxies who wish to ask questions, express opinions and/or make suggestions are asked to raise their hands, and then the Meeting officer will hand them a question/opinion/proposal form to fill in the name of the Entitled Shareholder, number of shares. owned/represented and questions/opinions/suggestions submitted. The question/opinion/suggestion form must be submitted to the Meeting officer to be submitted to the Chair of the Meeting and first validated by a Notary.
4. Every question/opinion/suggestion submitted by the Entitled Shareholder must meet the requirements that in the opinion of the Chair of the Meeting the matter is directly related to the Meeting agenda item being discussed.

5. The Chairman of the Meeting will read the questions/opinions/ suggestions submitted and respond to the questions/ opinions/proposals one by one. If necessary, the Chair of the Meeting will invite members of the Board of Directors or Board of Commissioners of the Company or Institutions and/ or Supporting Professionals to answer or respond to these questions/opinions/suggestions.

After all questions/opinions/suggestions have been answered or responded to, a vote will be held, only Entitled Shareholders or their legal proxies have the right to vote.

Annual GMS 2024 Implementation and Realization

Stage	Detail
Notification	Letter Number 60/DIR/CSD/I/2024 dated January 18, 2024 regarding Submission of the Implementation Date and Agenda of the Annual GMS for the 2023 Fiscal Year of PT Bank Tabungan Negara (Persero) Tbk was submitted to the OJK with copies to PT Bursa Efek Indonesia, PT Kustodian Sentral Efek Indonesia, PT Datindo Entrycom, and the Company's Board of Commissioners.
Announcement	It was published through the e-GMS provider website, the Indonesia Stock Exchange website, and the Company's website dated January 29, 2024.
Invitation	It was published through the e-GMS provider's website, the Indonesia Stock Exchange website, and the Company's website dated February 13, 2024.
Implementation	The GMS was held on Wednesday, March 6, 2024 at 14.31 WIB – 17.13 WIB at Gedung Menara BTN, lantai 6t, Jl. Gajah Mada No. 1 Jakarta Pusat 10130.
Announcement of Summary of GMS Minutes	It was published through the e-GMS provider website, the Indonesia Stock Exchange website, and the Company's website on March 8, 2024.
GMS Minutes	Letter Number 555/CSD/CMPO/IV/2024 dated April 5, 2024 regarding Submission of the Deed of the 2024 Annual General Meeting of Shareholders (AGM) Minutes of PT Bank Tabungan Negara (Persero) Tbk, submitted to the OJK dated April 5, 2024.

Recapitulation of Attendance at the 2024 Annual GMS

The meeting was chaired by Mr. Chandra M. Hamzah, the President Commissioner/Independent, in accordance with the resolutions of the Board of Commissioners Meeting dated February 21, 2024, which was delivered through the Board of Commissioners' letter Number 27/KOM/BTN/II/2024 dated February 21, 2024 concerning the Chairperson of the Annual General Meeting of Shareholders for the 2023 Fiscal Year of PT Bank Tabungan Negara (Persero) Tbk, and attended by all members of the Board of Commissioners, President Director, Deputy President Director and all members of the Board of Directors, and all members of the Company's Audit Committee as follows:

No.	Name	Position	Attendance
1.	Chandra M. Hamzah	President Commissioner/ Independent	Present
2.	Iqbal Latanro	Vice-President Commissioner/Independent	Present
3.	Armand B. Arief	Independent Commissioner	Present
4.	Sentot A. Sentausa	Independent Commissioner	Present
5.	Andin Hadiyanto	Commissioner	Present
6.	Herry Trisaputra Zuna	Commissioner	Present
7.	Himawan Arief Sugoto	Commissioner	Present
8.	Nixon L.P. Napitupulu	President Director	Present
9.	Oni Febriarto Rahardjo	Vice President Director	Present
10.	Andi Nirwoto	Director of IT and Digital	Present
11.	Elisabeth Novie Riswanti	Director of Assets Management	Present
12.	Jasmin	Director of Distribution and Funding	Present

No.	Name	Position	Attendance
13.	Setiyo Wibowo	Director of Risk Management	Present
14.	Hirwandi Gafar	Director of Consumer	Present
15.	Nofry Rony Poetra	Director of Finance	Present
16.	Eko Waluyo	Director of Human Capital, Compliance, and Legal	Present
17.	Hakim Putratama	Director of Institutional Banking	Present

Independent Party Counting and/or Validating Votes

The results of decision-making are calculated by PT Datindo Entrycom as Securities Administration Bureau ("BAE") and then validated by Notary Ashoya Ratam, S.H., M.Kn, both of whom were appointed by the Company.

Resolutions and Realization of the 2024 Annual GMS

First Agenda

Approval of the Annual Report and Ratification of the Company's Financial Statements, Approval of the Board of Commissioners' Supervisory Tasks Report and Ratification of the Financial Statements of the Micro and Small Business Funding Program (PUMK) for the 2023 Financial Year as well as Full Settlement and Release of Responsibility (volledig acquit et de charge) to the Board of Directors for the Company's Management Actions and the Board of Commissioners for the Company's Supervisory Actions that have been carried out during the 2023 Financial Year.

There were 4 (four) shareholders who submitted questions, opinions, and/or suggestions regarding the first agenda item of the Meeting. The summary and essence of the question and answer process for the agenda item are as follows:

No.	Feedback/Questions	Answers
1.	In the context of implementing the development of PT Bank Tabungan Negara (Persero) Tbk/"BTN" to improve the Company's performance, we hereby convey the following matters: 1. We express our gratitude and appreciation to all members of the Board of Commissioners, Directors and BTN Employees for: a. Success in improving the Company's performance, as reflected in: 1) Net profit increased by 14.97% YoY to IDR3.50 trillion. 2) Total loan increased by 11.87% YoY to IDR333.69 trillion. 3) Fee Based Income Realization increased by 60.15% YoY to IDR3.22 trillion. 4) CASA ratio increased from 48.52% to 53.73%. 5) CIR ratio decreased from 46.66% to 45.26%. 6) Gross NPL ratio decreased from 3.38% to 3.01% and LAR decreased from 23.24% to 21.20%. b. The Company's commitment to supporting the government's program to maximize the provision of housing financing for the people, especially for low-income communities, to achieve zero backlog by 2045. We hope that this achievement will continue to be improved in the future so that the Company can contribute more optimally not only to shareholder returns but also to the state and society. 2. Matters that require the attention of the Board of Commissioners and Directors of BTN to improve future performance are as follows: a. To anticipate global economic conditions in 2024 which have the potential for inflationary pressures and tightening of global monetary policy with increasingly limited fiscal space, the Company must establish a more selective loan distribution strategy, implement sustainable loan risk management, and optimal liquidity management;	Thank you Series A Dwiwarna Shareholders for your feedback. The Company will note and follow up on the notes from Series A Dwiwarna Shareholders

No.	Feedback/Questions	Answers
	b. Nationally, economic growth in 2024 is predicted to remain strong and grow positively in the range of 4.8% - 5.2%. In addition, the housing sector still has a very large room to grow considering the still high national housing backlog, the high number of people who do not have decent homes, and the extension of the stimulus provided by the Government in the housing sector. This opportunity should be utilized well by the Company by optimizing all existing potential so that it can become The Best Mortgage Bank in Southeast Asia as expected; c. The Company should focus on strengthening strategy, business innovation, and market expansion to increase market capitalization so that it can provide added value to Shareholders; d. Considering that in 2023 there would be a decline in net interest income, the Company is expected to: 1) Making efforts to reduce the cost of funds by increasing low-cost funds (CASA), strengthening ecosystem-based businesses, penetrating mobile banking as a digital financial solution, and optimizing cash management service penetration for customers, so that they can excel in the competition of banking service transaction. 2) Encourage a housing ecosystem with new mortgage models, other quality and sustainable business expansions, and optimize yields on loan distribution while still prioritizing the principle of prudence so that there is a sustainable increase in profitability. e. Continue to encourage increased revenue contributions from Other Operating Income, especially Fee Based Income (FBI) through massive acceleration of digital financial services and transactional banking, especially for internet and mobile banking users, as well as the development of fee based from other new sources such as foreign exchange services, forex trading, and structured products; f. Ensure the achievement of the State Capital Participation (PMN) KPI target, especially on indicators that were not achieved in 2023, namely BOPO, Gross NPL and Realization of Subsidized Mortgage Loans; g. In connection with the increasing role of information technology in the banking industry and the increasingly massive hacking efforts and cyber security disruptions that have a very massive impact on operations, finances, and reputation, the Company is expected to strengthen its cyber security in terms of policy, infrastructure, operating systems, and risk mitigation; h. To promote the principle of sustainable finance, the Company must maintain its commitment to developing ESG initiatives, including through the Company's work program, loan distribution and issuance of debt securities based on the principle of green financing. In addition, the implementation of ESG initiatives must be aligned with the direction of the government's program focus on the context of national economic recovery and development; i. The Company must continue to commit to making improvements in the implementation of the Anti-Fraud Strategy in each of its pillars and not give tolerance (zero tolerance) to any form of fraud, both internal and external; j. Following up on internal and external audit/ auditor findings, optimizing risk management and implementing the three lines of defense, and always prioritizing the principles of Good Corporate Governance and paying attention to the provisions of Anti-Money Laundering, Prevention of Terrorism Funding and Prevention of Proliferation of Weapons of Mass Destruction (AML, CFT, AND PFWMD).	

No.	Feedback/Questions	Answers
2.	a. In our attention, there is an increase in the provision for impairment losses on financial assets. Is this due to an increase in NPL because of BTN's inability to pay home loan debt, motorcycle loan debt, unsecured loan debt, or credit card debt? b. Recently, PT Akulaku Finance Indonesia successfully obtained the revocation of sanctions by OJK. Does this have an impact on the banking industry, especially BTN considering that Buy Now Pay Later (BNPL) companies have a CAGR of >10% per year?	In 2023, the Company experienced a decrease in gross NPL from 3.38% to 3.01%. Related to the increase in CKPN reserves for NPL in 2023, reaching 155.16%, it aims to increase the Company's caution against NPL risk and increase the Company's coverage. The Company has a different business concentration from PT Akulaku Finance Indonesia. Until now, the Company has not had any competitive intersection with PT Akulaku. However, in the future, the Company plans to issue a BNPL product which is expected to be licensed by OJK this year.
3.	a. Which business division is disruptive to increasing the Company's profits and what solutions is management implementing to improve it? b. As the king of subsidized housing mortgages, is there a Company agenda to create a flat installment mortgage service for up to 30 years, and will this disrupt the NPL if the customer defaults due to retirement or layoffs?	Basically, all Divisions have contributed well, so that no business Division has become a disruption in increasing profits. This is reflected in the Company's performance in 2023 which generally recorded good results, including increasing assets, increasing loan and DPK growth, LAR and other financial ratios recorded well, increasing CKPN reserves, increasing profits and becoming the biggest achievement since the Company was established. The mortgage scheme with a flat interest calculation may be implemented by the Company, but this scheme will be very burdensome for consumers, especially if applied to mortgages with a long term of up to 30 years. The interest paid by consumers will be higher than the principal, because the interest with a flat scheme will be higher than the interest with an annuity or effective scheme, which is a mortgage interest calculation scheme commonly used by the market. For this reason, the Company will not use this scheme at this time.
4	Through CSR funds, BTN is expected to play an active role in building the mentality of the nation's children, especially Gen Z, which is currently considered the strawberry generation (Kompas.id, June 26, 2023). They are seen as a young generation that is soft, spoiled, and has weak fighting spirit when facing challenges, even though they are the generation that plays an important role in achieving Indonesia Emas 2045. One way to build generation z so that they have a strong mentality, high fighting spirit and a patriotic spirit & high sense of nationalism, is to distribute free biographical books of national heroes. Thus, the spirit of nationalism, high fighting spirit is expected to be transmitted to gen z who read the books of these heroes.	This will be input for the Company.

Voting Results

Agree	: 10.767.960.536 (96,2067051%)
Disagree	: 200 (0,0000018%)
Abstain	: 424.565.315 (3,7932931%)

Decisions

1. Approve the Company's Annual Report including the Company's Board of Commissioners' Supervisory Duties Report for the 2023 Financial Year ending on December 31, 2023.
2. Ratify:
   a. The Company's Financial Statement for the 2023 Financial Year ended on December 31, 2023, which has been audited by the Public Accounting Firm Purwantono, Sungkoro & Surja (a member firm of the Ernst & Young Global network) in accordance with Report Number 00048/2.1032/AU.1/07/1681-1/1/II/2024 dated February 12, 2024 with a fair opinion in all material respects; and
   b. Financial Report of the Micro and Small Business Funding Program for the 2023 Financial Year ending on December 31, 2023, which has been audited by the Public Accounting Firm Purwantono, Sungkoro & Surja (a member firm of the Ernst & Young Global network) in accordance with Report Number 00047/2.1032/AU.2/10/1681-1/1/II/2024 dated February 12, 2024 with a fair opinion in all material respects.
3. With the approval of the Company's Annual Report including the Board of Commissioners' Supervisory Task Report, and the ratification of the Company's Financial Report and the Financial Report of the Micro and Small Business Funding Program (PUMK), all for the 2023 Financial Year ending on December 31, 2023, the GMS grants full release and discharge (volledig acquit et de charge) to all members of the Board of Directors for their management of the Company and to all members of the Board of Commissioners for their supervisory actions for the Company that have been carried out during the 2023 Financial Year ending on December 31, 2023, as long as such actions do not constitute a criminal act and are reflected in the reports mentioned above.

Status: Realized

Second Agenda

Determination of Use of the Company's Net Profit for the 2023 Financial Year

There were no questions, opinions and/or suggestions submitted in the discussion of the second agenda item of the Meeting.

Voting Results

Agree	: 10.818.441.493 (96,6577290%)
Disagree	: 200 (0,0000018%)
Abstain	: 374.084.358 (3,3422693%)

Decisions

Approving the use of the Company's net profit for the 2023 Financial Year amounting to IDR3,500,987,620,258.75 (three trillion five hundred billion nine hundred eighty seven million six hundred twenty thousand two hundred fifty eight point seven five in IDR) as follows:

1. 20% (twenty percent) or an amount of IDR 700,197,524,051.75 (seven hundred billion one hundred ninety seven million five hundred twenty four thousand fifty one point seven five in IDR) or IDR 49.89136 (forty nine point eight nine one three six in IDR) per share is determined as Cash Dividend. The payment is carried out with the following provisions:
   a. Dividends of the Republic of Indonesia's share amounting to IDR 420,118,514,441.03 (four hundred twenty billion one hundred eighteen million five hundred fourteen thousand four hundred and forty one point zero three in IDR) were deposited into the State General Cash Account.
   b. Dividends for the 2023 Financial Year are paid proportionally to each Shareholder whose name is recorded in the Shareholder Register on the recording date.
   c. The Board of Directors is given authority and power with the right of substitution to carry out:
      i. Determination of the schedule and procedures for distribution related to the payment of Dividends for the 2023 Financial Year in accordance with applicable provisions.
      ii. Dividend tax deductions in accordance with applicable tax regulations.
      iii. Other technical matters in accordance with applicable provisions.
2. 80% (eighty percent) or an amount of IDR 2,800,790,096,207.00 (two trillion eight hundred billion seven hundred ninety million ninety-six thousand two hundred and seven IN IDR) is used as retained earnings balance.

Status: Realized

Third Agenda

Determination of Remuneration (salary/honorarium, facilities and allowances) for 2024, as well as Tantiem for Performance in 2023 for the Company's Board of Directors and Board of Commissioners.

There were no questions, opinions and/or suggestions submitted in the discussion of the third agenda item of the Meeting.

Voting Results

Agree	: 10.469.506.271 (93,5401555%)
Disagree	: 348.930.722 (3,1175333%)
Abstain	: 374.089.058 (3,3423113%)

Decisions

1. Approve the granting of authority and power to the Series A Dwiwarna Shareholders to determine for the Members of the Board of Commissioners:
   a. Tantiem/Performance Incentive/Special Incentive for the 2023 Financial Year in accordance with applicable provisions; and
   b. Honorarium, Allowances and Facilities for the 2024 Financial Year.
2. Approve the granting of authority and power to the Board of Commissioners by first obtaining written approval from the Series A Dwiwarna Shareholders to determine for the Members of the Board of Directors:
   a. Tantiem/Performance Incentive/Special Incentive for the 2023 Financial Year in accordance with applicable provisions; and
   b. Salary, Allowances and Facilities for the 2024 Financial Year.

Status: Realized

Fourth Agenda

Appointment of Public Accountant (AP) and/or Public Accounting Firm (KAP) to audit the Company's Financial Report and the Financial Report of the Micro and Small Business Funding Program (PUMK) for the 2024 Financial Year

There were no questions, opinions and/or suggestions submitted in the discussion of the fourth agenda item of the Meeting.

Voting Results

Agree	: 10.818.441.493 (96,6577290%)
Disagree	: 200 (0,0000018%)
Abstain	: 374.084.358 (3,3422693%)

Fourth Agenda

Decisions

1. Approve the appointment of Purwantono, Sungkoro & Surja (a member firm of the Ernst & Young Global network), as the Public Accounting Firm that will audit the Company's Financial Statements, the Financial Statements of the Micro and Small Business Funding Program and other reports for the 2024 Financial Year.
2. Approve the granting of authority and power to the Company's Board of Commissioners to carry out:
   a. Appointment of a Public Accountant and/or Public Accounting Firm to conduct an audit of the Company's Financial Statements for other periods in the 2024 Financial Year for the purposes and interests of the Company; and
   b. Determination of audit service fees and other requirements for the Public Accountant and/or Public Accounting Firm, and appointment of a replacement Public Accountant and/or Public Accounting Firm in the event that the Public Accounting Firm of Purwantono, Sungkoro & Surja (a member firm of the Ernst & Young Global network), for whatever reason, is unable to complete the provision of audit services for the Company's Financial Statements for the 2024 Financial Year and/or other periods in the 2024 Financial Year, as well as the Financial Statements of the Micro and Small Business Funding Program for the 2024 Financial Year, including determining audit service fees and other requirements for the replacement Public Accountant and/or Public Accounting Firm.

Status: Realized

Fifth Agenda

Report on the Realization of the Use of Funds from the Increase in Capital by Granting Preemptive Rights II (PMHMETD II).

The fifth agenda item was a nature report so there was no question and answer session.

Voting Result
The fifth agenda item of the meeting was of a nature report so no decisions were taken.

Sixth Agenda

Approval of Amendments to the Company's Articles of Association

There were no questions, opinions and/or suggestions submitted in the discussion of the sixth agenda item of the Meeting.

Voting Result

Agree	: 10.128.364.939 (90,4922168%)
Disagree	: 690.076.754 (6,1655139%)
Abstain	: 374.084.358 (3,3422693%)

Decisions

1. Approve changes to the Company's Articles of Association, including complying with statutory regulations:
   a. OJK Regulation Number 17 of 2023 dated September 14, 2023, concerning Implementation of Governance for Commercial Banks;
   b. Regulation of the Minister of SOEs Number PER-2/MBU/03/2023 dated March 24, 2023, concerning Guidelines for Governance and Significant Corporate Activities of SOEs;
   c. Regulation of the Minister of SOEs Number PER-3/MBU/03/2023 dated March 24, 2023, concerning SOE Organs and Human Resources; and
   d. other related regulations.
2. Agree to re-draft all provisions in the Company's Articles of Association in connection with the changes referred to in point 1 (one) above.
3. Grant authority and power to the Board of Directors with the right of substitution to take all necessary actions related to the decisions of the Meeting, including but not limited to compiling and restating all of the Company's Articles of Association in a Notarial Deed, adjusting changes to the Company's Articles of Association if this is required by the authorized agency and submitting it to the authorized agency to obtain approval and a receipt for notification of changes to the Company's Articles of Association, as well as doing everything deemed necessary and useful for this purpose with none being excluded.

Status: Realized

Seventh Agenda

Changes to the Company's Management Composition.

There were no questions, opinions and/or suggestions submitted in the discussion of the seventh agenda item of the Meeting.

Voting Result

Agree	: 10.430.252.214 (93,1894388%)
Disagree	: 388.189.479 (3,4682919%)
Abstain	: 374.084.358 (3,3422693%)

Decisions

1. To confirm the honorable dismissal of the following names as Members of the Company's Board of Commissioners:
   1) Mr. Ahdi Jumhari Luddin – as Independent Commissioner;
   2) Mr. Mohamad Yusuf Permana – as Commissioner;

   who were appointed respectively based on the Resolution of the 2019 EGMS dated November 27, 2019, and the Resolution of the 2023 EGMS dated January 11, 2023, respectively effective from August 12, 2023 and March 4, 2024, with gratitude for the contribution of energy and ideas given during their tenure as Members of the Company's Board of Commissioners.

2. To honorably dismiss the following names as Company Managers:
   1) Ms. Elisabeth Novie Riswanti – as Director of Assets Management;
   2) Mr. Hirwandi Gafar – as Director of Consumer;
   3) Mr. Jasmin – as Director of Distribution and Funding;
   4) Mr. Setiyo Wibowo – as Director of Risk Management;
   5) Mr. Chandra M. Hamzah – as President Commissioner/Independent;
   6) Mr. Andin Hadiyanto – as Commissioner;
   7) Mr. Armand B. Arief – as Independent Commissioner;

   who were appointed respectively based on the Decision of the 2019 Extraordinary General Meeting of Shareholders dated August 29, 2019 in conjunction with the 2019 Extraordinary General Meeting of Shareholders dated November 27, 2019 in conjunction with the 2020 Financial Year General Meeting of Shareholders dated March 10, 2021 in conjunction with the 2021 Financial Year General Meeting of Shareholders dated March 2, 2022, the Decision of the 2019 Extraordinary General Meeting of Shareholders dated November 27, 2019 in conjunction with the 2021 Financial Year General Meeting of Shareholders dated March 2, 2022, the Decision of the 2019 Extraordinary General Meeting of Shareholders dated November 27, 2019 in conjunction with the 2020 Financial Year General Meeting of Shareholders dated March 10, 2021 ..., the Decision of the 2020 Financial Year General Meeting of Shareholders dated March 10, 2021, and the Decision EGMS 2019 dated November 27, 2019, effective from the c losing of the GMS, with gratitude for the contribution of energy and thoughts given during his tenure as the Company's Management.

3. Changing the nomenclature of positions of members of the Company's Board of Directors as follows:

No.	Past	Then
1.	Director of Distribution and Funding	Director of Distribution and Institutional Funding
2.	Director of IT and Digital	Director of Information Technology
3.	Director of Institutional Banking	Director of Operations and Customer Experience
4.	-	Director of SME and Retail Funding

4. To assign the following names as Members of the Company's Board of Directors:

No.	Name	Past	Then
1.	Mr. Andi Nirwoto	Director of IT and Digital	Director of Information Technology
2.	Mr. Hakim Putratama	Director of Institutional Banking	Director of Operations and Customer Experience

   who were appointed respectively based on the Decision of the 2023 Extraordinary General Meeting of Shareholders dated January 11, 2023 and the Decision of the 2022 Financial Year General Meeting of Shareholders dated March 16, 2023, with a term of office continuing the remaining term of office based on the said General Meeting of Shareholders.

5. Appoint the following names as Directors of the Company:
   1) Mrs. Elisabeth Novie Riswanti – as Director of Assets Management;
   2) Mr. Hirwandi Gafar – as Director of Consumer;
   3) Mr. Jasmin – as Director of Distribution and Institutional Funding;
   4) Mr. Setiyo Wibowo – as Director of Risk Management;
   5) Mr. Muhammad Iqbal – as Director of SME and Retail Funding;
   6) Mr. Chandra M. Hamzah – as President Commissioner/Independent;
   7) Mr. Bambang Widjanarko – as Independent Commissioner;
   8) Mr. Armand B. Arief – as Independent Commissioner;
   9) Mr. Adi Sulistyowati – as Independent Commissioner;
   10) Mr. Andin Hadiyanto – as Commissioner;

Seventh Agenda

6. The term of office of the members of the Board of Directors and Board of Commissioners appointed as referred to in point 5, is in accordance with the provisions of the Company's Articles of Association, considering laws and regulations in the Capital Market sector and without reducing the right of the GMS to be dismissed at any time.

7. With the confirmation of the dismissal, termination, change in job nomenclature, transfer of duties, and appointment of members of the Company's Board of Directors and Board of Commissioners as referred to in number 1, number 2, number 3, number 4, and number 5, the composition of the members of the Company's Board of Directors and Board of Commissioners is as follows:
   a. Board of Directors
      1) President Director: Nixon L.P. Napitupulu
      2) Deputy President Director: Oni Febriarto Rahardjo
      3) Finance Director: Nofry Rony Poetra
      4) Assets Management Director: Elisabeth Novie Riswanti
      5) Human Capital, Compliance, and Legal Director: Eko Waluyo
      6) Risk Management Director: Setiyo Wibowo
      7) Distribution and Institutional Funding Director: Jasmin
      8) Information Technology Director: Andi Nirwoto
      9) Consumer Director: Hirwandi Gafar
      10) Operations and Customer Experience Director: Hakim Putratama
      11) SME and Retail Funding Director: Muhammad Iqbal
   b. Board of Commissioners
      1) Main Commissioner/Independent: Chandra M. Hamzah
      2) Deputy Main Commissioner/Independent: Iqbal Latanro
      3) Independent Commissioner: Bambang Widjanarko
      4) Independent Commissioner: Armand B. Arief
      5) Independent Commissioner: Sentot A. Sentausa
      6) Independent Commissioner: Adi Sulistyowati
      7) Commissioner: Andin Hadiyanto
      8) Commissioner: Herry Trisaputra Zuna
      9) Commissioner: Himawan Arief Sugoto

8. Members of the Board of Directors and Board of Commissioners appointed as referred to in number 5 points 5), 7), and 9) may only carry out their duties after obtaining approval from the Financial Services Authority (OJK) for the Fit and Proper Test and complying with applicable laws and regulations. In the event that members of the Board of Directors and Board of Commissioners of the Company are later declared not approved as members of the Board of Directors and Board of Commissioners in the Fit and Proper Test by the OJK, then the members of the Board of Directors and Board of Commissioners of the Company shall be honorably dismissed as of the date of the stipulation of the decision on the results of the OJK Fit and Proper Test.

9. Members of the Board of Directors and Board of Commissioners appointed as referred to in point 5 who are still holding other positions which are prohibited by laws and regulations from being held concurrently with the position of member of the Board of Directors or Board of Commissioners of a State-Owned Enterprise, then the person concerned must resign or be dismissed from said position.

10. Request the Board of Directors to submit a written application to the Financial Services Authority for the implementation of a Fit and Proper Test for members of the Board of Directors and Board of Commissioners appointed as referred to in number 5, points 5), 7), and 9).

11. Granting power of attorney with the right of substitution to the Company's Board of Directors to state the decisions of this GMS in the form of a Notarial Deed and to appear before a Notary or authorized official, and to make adjustments or improvements as necessary if required by the authorized party for the purposes of implementing the contents of the meeting's decisions.

Status: Realized

Annual GMS 2023 Implementation and Realization

Stages	Description
Notification	The Letter Number 151/DIR/CSD/I/2023 dated January 26, 2023 concerning the Submission of the Implementation Date and Agenda of the 2022 Annual GMS of PT Bank Tabungan Negara (Persero) Tbk submitted to the OJK with a copy to PT Bursa Efek Indonesia, PT Kustodian Sentral Efek Indonesia, PT Datindo Entrycom, and the Company's Board of Commissioners.
Announcement	Published on the e-GMS provider website, the Indonesia Stock Exchange website, and the Company website dated February 7, 2023.
Invitation	Published on the e-GMS provider website, the Indonesia Stock Exchange website, and the Company website dated February 22, 2023.

Stages	Description
Implementation	The GMS was held on Thursday, dated March 16, 2023 at 14.33 WIB – 17.18 WIB at the BTN Tower Building, 6th floor Jl. Gajah Mada No. 1 Central Jakarta 10130
Summary of GMS Minutes	Published on the e-GMS provider website, the Indonesia Stock Exchange website, and the Company website dated March 17, 2023.
GMS Minutes	The Letter Number 508/CSD/RCD/IV/2023 dated April 12, 2023 concerning the Submission of the Deed of Minutes of the 2023 Annual General Meeting of Shareholders (AGMS) of PT Bank Tabungan Negara (Persero) Tbk submitted to the OJK dated April 12, 2023.

Recapitulation of Attendance at the 2023 Annual GMS

The meeting was chaired by Chandra M. Hamzah, as the President Commissioner/Independent, in accordance with the decision of the Board of Commissioners Meeting dated March 08, 2023, which was conveyed by the letter of Board of Commissioners No. 46/KOM/ BTN/III/2023 dated March 08, 2023 concerning the Chairman of the Annual General Meeting of Shareholders Year 2022 of PT Bank Tabungan Negara (Persero) Tbk, and attended by all members of Board of Commissioners, all members of Board of Directors and all members of the Company's Audit Committee, listed as follows:

No.	Name	Position	Attendance
1.	Chandra M. Hamzah	President Commissioner/ Independent	Present
2.	Iqbal Latanro	Vice-President Commissioner/Independent	Present
3.	Ahdi Jumhari Luddin*	Independent Commissioner	Present
4.	Armand B. Arief	Independent Commissioner	Present
5.	Sentot A. Sentausa	Independent Commissioner	Present
6.	Andin Hadiyanto	Commissioner	Present
7.	Herry Trisaputra Zuna*	Commissioner	Present
8.	Himawan Arief Sugoto	Commissioner	Present
9.	Mohamad Yusuf Permana*	Commissioner	Present
10.	Haru Koesmahargyo	President Director	Present
11.	Nixon L.P. Napitupulu	Vice President Director	Present
12.	Andi Nirwoto	Director of IT and Digital	Present
13.	Elisabeth Novie Riswanti	Director of Assets Management	Present
14.	Jasmin	Director of Distribution and Funding	Present
15.	Setiyo Wibowo	Director of Risk Management	Present
16.	Hirwandi Gafar	Director of Consumer	Present
17.	Nofry Rony Poetra	Director of Finance	Present
18.	Eko Waluyo	Director of Human Capital, Compliance, and Legal	Present
19.	Endang A. Suprijatna	Member of the Audit Committee	Present
20.	Peter Eko Budi Darwito	Member of the Audit Committee	Present

* Attended the meeting via video teleconference.

Independent Party Counting and/or Validating Votes

The results of decision-making are calculated by PT Datindo Entrycom as Securities Administration Bureau ("BAE") and then validated by Notary Ashoya Ratam, S.H., M.Kn, both of whom were appointed by the Company.

Resolutions and Realization of the 2024 Annual GMS

First Agenda

Approval of the Annual Report and Ratification of the Company's Financial Statements, Approval of the Board of Commissioners' Supervisory Tasks Report and Ratification of the Financial Statements of the Micro and Small Business Funding Program (PUMK) for the 2023 Financial Year as well as Full Settlement and Release of Responsibility (volledig acquit et de charge) to the Board of Directors for the Company's Management Actions and the Board of Commissioners for the Company's Supervisory Actions that have been carried out during the 2023 Financial Year.

There were 4 (four) shareholders who submitted questions, opinions, and/or suggestions regarding the first agenda of the Meeting. The summary and essence of the question-and-answer process for the agenda are as follows:

No.	Feedback/Questions	Answers
1.	To improve the Company's performance and the effectiveness of coaching of PT Bank Tabungan Negara (Persero) Tbk ("BTN"), we hereby submit the response of the Series A Dwiwarna Shareholders as follows: 1. For the Company's performance achievements in the 2022 Financial Year, we would like to express our gratitude and appreciation to all levels of the Board of Commissioners, Directors, and BTN Employees for: a. Improving the Company's performance achievements and commitment in maintaining the Bank's sustainability amidst the global economic downturn following the Covid-19 pandemic, including: 1) The Company's Net Profit increased by 28.14% yoy or reached IDR 3,045 billion. 2) Total loan grew by 8.53% yoy from IDR 274.8 trillion to IDR 298.3 trillion. 3) Third Party Funds grew by 8.77% from IDR 296.0 trillion in 2021 to IDR 321.9 trillion in 2022. 4) Cost of Fund improved from 3.13% to 2.60%. 5) Cost efficiency as indicated by the decrease in the BOPO ratio from 89.28% to 86.00%. These performance achievements should be improved in the next period so that the company can contribute more optimally to shareholder returns. b. The Company's success in implementing the Rights Issue with an oversubscribed portion for public shareholders of 1.6 times. This shows investors' confidence in BTN's future performance prospects which are expected to continue to grow and be sustainable through increasing the capacity of housing financing distribution in Indonesia. 2. Matters that require the attention of the Board of Commissioners and Directors of BTN to improve future performance are as follows: a. Anticipating the uncertain global economic conditions in 2023 which will potentially cause a decrease in loan demand, rising interest rate trends and inflationary pressures, the Company should establish a more selective loan distribution strategy, implement sustainable loan risk management, and optimal liquidity management. b. Anticipating a decrease in loan quality due to the end of the relaxation period, the Company should maintain an adequate coverage ratio through the formation of CKPN by considering valid and relevant internal and external conditions, as well as the possibility of a decrease in the quality of the loan portfolio beyond predictions. The experience of +/- 3 (three) years during the pandemic is expected to be a lesson learned for BTN in determining strategies and managing business risks in the future.	Thank you Series A Dwiwarna Shareholders for your feedback. The Company will note and follow up on the notes from Series A Dwiwarna Shareholders

No.	Feedback/Questions	Answers
	c. Sharpening the strategy in reducing the cost of funds by focusing on low-cost funding on low-cost fund products (CASA) through optimal services for customers and reliable e-channel support and re-negotiating and reprofiling the interest rates of 50 Core Depositors during the extension to maintain the cost of funds at an optimal level. d. Developing e-channels to focus on the most valuable product (MVP) that is tailored to customer needs and continuously monitoring the suitability between the achievement of promised benefits and the quality and time targets that have been determined. e. Developing strategies in the retail transaction segment, e-channel transactions, and digital mortgages as an effort to increase fee-based income to create a competitive advantage in the property and housing financing segment. f. Maintaining commitment to developing ESG initiatives, including through the Company's work program, loan distribution and issuance of debt securities based on the principle of green financing. g. Completing follow-up actions on internal and external audit/examination findings, optimizing the effectiveness of the implementation of the three lines of defense in the Company's operations, and always prioritizing the principles of good corporate governance and provisions on Anti-Money Laundering and Prevention of Terrorism Funding (AML CFT).	
2.	1. How is the synergy between High Yield Loan (KTA) acquisition and payroll to increase CASA? 2. Can NIM be maintained at around 4% with increasing Cost of Loan/ Cost of Fund?	1. The Company has an opportunity of 600,000 potential customers who can be offered top-up credit with a higher margin (KUR, KAR, and KRING). Currently, the Company is conducting a trial with a simpler and faster process with the Teken Aja technology, which does not go through an application process, but with an offer. This process is in the finalization process and will be rolled out soon, because it is expected to increase high-margin credit. 2. Regarding CASA, the Company is currently developing several savings products, namely BTN Bisnis. The growth of this BTN Bisnis product continues to be pursued, until as of December 31, 2022, IDR 2 trillion has been collected. This strategy is in line with the efforts made by the Company to continue to increase the value chain related to the housing business. 3. NIM will still be maintained at around 4% - 4.4%. The Company has several high-margin credit products, namely KPR BTN Subsidized Interest Difference (SSB).
3.	The Company's profit amounted to IDR 3.04 trillion because it involved several loan accounts questioned by Shareholders.	The first agenda of the Meeting is related to the financial report that has considered accounting principles and has been audited by an independent Public Accounting Firm (KAP). Before providing an audit opinion, KAP has discussed with the regulator. Other matters are not directly related to the agenda of the Meeting.

Voting Result

Agree	: 10.356.519.438 (99,4981302%)
Disagree	: 21.062 (0,0002023%)
Abstain	: 52.217.346 (0,5016674%)

Decisions

1. Approve the Company's Annual Report including the Company's Board of Commissioners' Supervisory Duties Report for the 2022 Financial Year ending on December 31, 2022.
2. Ratify:
   a. The Company's Financial Statement for the 2022 Financial Year ending on December 31, 2022, which has been audited by the Public Accounting Firm (KAP) Purwantono, Sungkoro & Surja in accordance with Report Number 00082/2.1032/AU.1/07/0240-3/1/II/2023 dated February 17, 2023.
   b. The Financial Statement of the Micro and Small Business Funding Program for the 2022 Financial Year ending on December 31, 2022, which has been audited by the Public Accounting Firm (KAP) Purwantono, Sungkoro & Surja in accordance with Report Number 00083/2.1032/AU.2/07/0240-2/1/II/2023 dated February 17, 2023, both with a fair opinion in all material respects.

3. With the approval of the Company's Annual Report including the Board of Commissioners' Supervisory Task Report, and the ratification of the Company's Financial Report and the Financial Report of the Micro and Small Business Funding Program (PUMK), all for the 2022 Financial Year ending on December 31, 2022, the GMS grants full release and discharge of responsibility (volledig acquit et de charge) to all members of the Board of Directors for their management actions of the Company and to all members of the Board of Commissioners for their supervision actions of the Company that have been carried out during the 2022 Financial Year ending on December 31, 2022, as long as such actions do not constitute a criminal act and are reflected in the report above.

Status: Realized

Second Agenda

Approval of the use of the Company's net profit for the 2022 Financial Year

There is 1 (one) shareholder who submits a question, opinion and/or suggestion, but contains a stance that will be decided in a vote.

Voting Result

Agree	: 10.403.502.187 (99,9495073%)
Disagree	: 21.062 (0,0002023%)
Abstain	: 5.234.597 (0,0502903%)

Decisions

Approve and determine the use of the Company's net profit for the 2022 Financial Year amounting to IDR 3,045,071,859,198,- (three trillion forty-five billion seventy-one million eight hundred fifty-nine thousand one hundred and ninety-eight in IDR) as follows:

1. 20% (twenty percent) or Rp. 609,014,371,840,- (six hundred nine billion fourteen million three hundred seventy one thousand eight hundred and forty in IDR) as Cash Dividends to shareholders which will be paid with the following provisions:
   a. Dividends from the Government of the Republic of Indonesia for ownership of 60% (sixty percent) of shares amounting to Rp365,408,623,104,- (three hundred sixty five billion four hundred eight million six hundred twenty three thousand one hundred and four in IDR), will be deposited into the State General Treasury Account in Rupiah currency.
   b. Dividends from other shareholders for ownership of 40% (forty percent) of public shares amounting to Rp243,605,748,736,- (two hundred forty three billion six hundred five million seven hundred forty eight thousand seven hundred and thirty six in IDR) will be paid to shareholders proportionally according to share ownership.
   c. Granting authority and power to the Company's Board of Directors with the right of substitution to determine the schedule and procedures for distribution of dividends for the 2022 Financial Year in accordance with applicable provisions.
2. 80% (eighty percent) or Rp2,436,057,487,358,- (two trillion four hundred thirty six billion fifty seven million four hundred eighty seven thousand three hundred fifty eight in IDR) as Retained Earnings balance.

Third Agenda

Determination of remuneration (salary/honorarium, facilities and allowances) for 2023 and Tantiem for the 2022 Financial Year for the Company's Board of Directors and Board of Commissioners.

There were no interrogators in the discussion of the third agenda item of the Meeting

Voting Result

Agree	: 10.403.002.553 (99,9447072%)
Disagree	: 531.596 (0,0051072%)
Abstain	: 5.223.697 (0,0501856%)

Decisions

1. Granting authority and power to the Company's Series A Dwiwarna Shareholders to determine the amount of bonuses for the 2022 Financial Year and salary/honorarium, facilities and allowances for the 2023 Financial Year for members of the Board of Commissioners.
2. Granting authority and power to the Company's Board of Commissioners by first obtaining written approval from the Company's Series A Dwiwarna Shareholders to determine the amount of bonuses for the 2022 Financial Year and salary/honorarium, facilities and allowances for the 2023 Financial Year for members of the Board of Directors.

Fourth Agenda

Appointment of a Public Accountant (AP) and/or Public Accounting Firm (KAP) to audit the Company's Financial Report and the Financial Report of the Micro and Small Business Funding Program (PUMK) for the 2023 Financial Year.

There were no interrogators in the discussion of the fourth agenda item of the Meeting.

Fourth Agenda

Voting Result

Agree	: 9.952.426.675 (95,6158921%)
Disagree	: 451.099.682 (4,3338474%)
Abstain	: 5.231.489 (0,0502605%)

Decisions

1. Appoint Public Accounting Firm (KAP) Purwantono, Sungkoro & Surja (Ernst & Young Global Limited) as the Public Accounting Firm that will audit the Company's Financial Statements and the Financial Statements of the Micro and Small Business Funding Program (PUMK) and other reports for the 2023 Financial Year.
2. Grant authority and power to the Company's Board of Commissioners to appoint a Public Accounting Firm to conduct an audit of the Company's Financial Statements for other periods in the 2023 Financial Year for the purposes and interests of the Company.
3. Grant authority and power to the Company's Board of Commissioners to determine the audit fee and other requirements for the KAP, and to appoint a replacement Public Accounting Firm in the event that KAP Purwantono, Sungkoro & Surja (Ernst & Young Global Limited) for any reason cannot complete the audit of the Company's Financial Statements and the Financial Statements of the Micro and Small Business Funding Program (PUMK) for the 2023 Financial Year, including determining the audit fee and other requirements for the replacement Public Accounting Firm.

Fifth Agenda

Approval of the Company's Resolution Plan.

There were no interogators in the discussion of the fifth agenda item of the Meeting.

Voting Result

Agree	: 10.403.476.130 (99,9492570%)
Disagree	: 38.600 (0,0003708%)
Abstain	: 5.243.116 (0,0503722%)

Decisions

Approving the 2022-2024 Resolution Plan prepared by the Company in accordance with Law Number 9 of 2016 concerning Prevention and Handling of Financial System Crises as amended by Law Number 4 of 2023 concerning Development and Strengthening of the Financial Sector and Regulation of the Deposit Insurance Agency Number 1 of 2021 concerning Resolution Plans for Commercial Banks.

Sixth Agenda

Report on the Realization of the Use of Proceeds from the Continuous Public Offering of Bank BTN's Continuous Bonds IV Phase II in 2022 and Additional Capital by Providing Preemptive Rights for Limited Public Offering II (PMHMETD II).

The sixth agenda item of the Meeting was a nature report so there was no question-and-answer session.

Voting Result

The sixth agenda item of the Meeting was a nature report, so no decisions were taken.

Decision

The sixth agenda item of the Meeting was a nature report, so no decisions were taken.

Seventh Agenda

Approval of Amendments to the Company's Articles of Association.

There were no interogators in the discussion of the seventh agenda item of the Meeting.

Voting Result

Agree	: 9.301.715.765 (89,3643209%)
Disagree	: 1.101.810.492 (10,5854177%)
Abstain	: 5.231.589 (0,0502614%)

Seventh Agenda

Decisions

1. Approve changes to the Company's Articles of Association in order to:
   a. Adjustment of provisions related to the Company's business activities as referred to Article 3 of the Company's Articles of Association refers to Law of the Republic of Indonesia Number 4 of 2023 concerning the Development and Strengthening of the Financial Sector, and Regulation of the Central Statistics Agency Number 2 of 2020 concerning the Standard Classification of Indonesian Business Fields.
   b. Improvement of the Company's Articles of Association in accordance with statutory provisions.
2. Approve to re-draft all provisions in the Articles of Association in connection with the changes as referred to point 1 of the decision above.
3. Grant power and authority to the Company's Board of Directors with the right of substitution to take all necessary actions related to the decisions of the agenda of this Meeting, including drafting and restating the entire Articles of Association of the Company in a Notarial Deed and granting power with the right of substitution to submit to the authorized agency to obtain approval and/or receipt of notification of changes to the Articles of Association of the Company, to do everything deemed necessary and useful for such purposes with none being excluded, including to make additions and/or changes to the Articles of Association of the Company if such is required by the authorized agency.

Eighth Agenda

Changes to the Composition and Determination of Remuneration of the Sharia Supervisory Board of the Company's UUS.

There were no interogators in the discussion of the eighth agenda item of the Meeting.

Voting Result

Agree	: 9.272.476.500 (89,0834107%)
Disagree	: 1.131.049.757 (10,8663279%)
Abstain	: 5.231.589 (0,0502614%)

Decisions

1. Approve and ratify the honorable dismissal of Muhammad Quraish Shihab as Chairman of the Company's Sharia Supervisory Board and Mohamad Hidayat as Member of the Company's Sharia Supervisory Board, with gratitude for all their contributions of energy and thoughts during their tenure.
2. Approve and ratify the reappointment of Muhammad Quraish Shihab as Chairman of the Company's Sharia Supervisory Board for the second term and will be effective after obtaining approval from the Financial Services Authority.
3. The end of the term of office of the members of the Company's Sharia Supervisory Board as referred to in the second point above is until the closing of the 5th Annual GMS since the appointment of the person concerned, namely the GMS held in 2028, with due regard to laws and regulations and without reducing the right of the GMS to dismiss at any time.
4. Approve the delegation of authority to the Company's Board of Commissioners to appoint other Sharia Supervisory Board Members if necessary to complete the composition of the Sharia Supervisory Board Members and determine the remuneration of the Company's Sharia Supervisory Board in order to supervise the Company's business activities based on sharia principles.
5. Grant power and authority to the Company's Board of Directors with the right of substitution to take all necessary actions related to the decisions of this agenda item in accordance with laws and regulations, including to state in a separate Notarial Deed and notify the composition of the Company's Sharia Supervisory Board to the Minister of Law and Human Rights.

Ninth Agenda

Changes to the Company's Management Composition.

There were no interogators in the discussion of the ninth agenda item of the Meeting.

Voting Result

Agree	: 9.268.759.831 (89,0477036%)
Disagree	: 1.134.636.387 (10,9007857%)
Abstain	: 5.361.628 (0,0515107%)

Decisions

1. Honorably dismiss Haru Koesmahargyo as the Company's President Director who was appointed based on the Resolution of the 2020 Annual GMS dated March 10, 2021, effective as of the closing of the GMS, with gratitude for the contribution of energy and thoughts given during his tenure as the Company's Management.
2. Transferring the assignment of Mr. Nixon L. P. Napitupulu who was appointed based on the Resolution of the Annual GMS for the 2021 Financial Year dated March 2, 2022, originally as Deputy President Director to President Director of the Company, with a term of office continuing the remaining term of office in accordance with the Resolution of the GMS appointing the person concerned.
3. Appoint the names below as the Company's Management:
   a. Oni Febriarto Rahardjo - as Deputy President Director;
   b. Hakim Putratama - as Director of Institutional Banking

Ninth Agenda

4. The term of office of the members of the Board of Directors appointed as referred to in point 3, is in accordance with the provisions of the Company's Articles of Association, taking into account laws and regulations in the Capital Market sector and without reducing the right of the GMS to dismiss at any time.
5. With the dismissal, transfer of duties and appointment of members of the Board of Directors as referred to in number 1, number 2 and number 3, the composition of the Company's Board of Directors membership will be as follows:
   a. President Director: Nixon L.P. Napitupulu
   b. Deputy President Director: Oni Febriarto Rahardjo
   c. Director of Finance: Nofry Rony Poetra
   d. Director of Assets Management: Elisabeth Novie Riswanti
   e. Director of Human Capital, Compliance, & Legal: Eko Waluyo
   f. Director of Risk Management: Setiyo Wibowo
   g. Director of Distribution & Funding: Jasmin
   h. Director of IT & Digital: Andi Nirwoto
   i. Director of Consumer: Hirwandi Gafar
   j. Director of Institutional Banking: Hakim Putratama
6. Members of the Board of Directors who are transferred as referred to in number 2 and appointed as referred to in number 3 may only carry out their duties after obtaining approval from the Financial Services Authority (OJK) for the Fit & Proper Test and complying with applicable laws and regulations. In the event that a member of the Company's Board of Directors is later declared not approved as a member of the Board of Directors in the Fit & Proper Test by the OJK, then the member of the Company's Board of Directors is honorably dismissed as of the date of the stipulation of the decision on the results of the OJK Fit & Proper Test.
7. Members of the Board of Directors appointed as referred to in point 3 who are still holding other positions which are prohibited by statutory regulations from being held concurrently with the position of member of the Board of Directors of a State-Owned Enterprise, then the person concerned must resign or be dismissed from said position.
8. Request the Board of Directors to submit a written application to the Financial Services Authority for the implementation of a Fit and Proper Test for members of the Board of Directors who are transferred as referred to in number 2 and appointed as referred to in number 3.
9. Granting power of attorney with the right of substitution to the Company's Board of Directors to state the decisions of this GMS in the form of a Notarial Deed and to appear before a Notary or authorized official, and to make adjustments or improvements as necessary if required by the authorized party for the purposes of implementing the contents of the meeting's decisions.

Implementation of the 2023 Extraordinary GMS and its Realization

Stages	Details
Notification	Letter Number 704/DIR/CSD/XI/2022 dated November 24, 2022 concerning Submission of the Implementation Date and Agenda for the Extraordinary GMS of PT Bank Tabungan Negara (Persero) Tbk submitted to the OJK with copies of PT Bursa Efek Indonesia, PT Kustodian Sentral Efek Indonesia, PT Datindo Entrycom, and the Board of Commissioners of the Company.
Announcement	Published on the e-GMS provider website, the Indonesia Stock Exchange website, and the Company website dated December 5, 2022.
Invitation	Published on the e-GMS provider website, the Indonesia Stock Exchange website, and the Company website dated December 20, 2022.
Implementation	The GMS was held on Wednesday, dated January 11, 2023 at 14.36 WIB – 15.10 WIB at the BTN Tower Building, 6th floor Jl. Gajah Mada No. 1 Central Jakarta 10130.
Summary of GMS Minutes	Published on the e-GMS provider website, the Indonesia Stock Exchange website, and the Company website dated January 12, 2023.
GMS Minutes	Letter Number 91/CSD/RCD/II/2023 dated February 3, 2023 concerning Submission of the Deed of Minutes of the 2023 Extraordinary General Meeting of Shareholders (EGMS) of PT Bank Tabungan Negara (Persero) Tbk submitted to the OJK dated February 3, 2023.

Recapitulation of Attendance at the 2023 Extraordinary GMS

No.	Name	Position	Attendance
1.	Chandra Hamzah	President Commissioner/Independent	Present
2.	Iqbal Latanro	Vice President Commissioner/Independent	Present
3.	Ahdi Jumhari Luddin	Independent Commissioner	Present

No.	Name	Position	Attendance
4.	Armand B. Arief	Independent Commissioner	Present
5.	Sentot A. Sentausa	Independent Commissioner	Present
6.	Andin Hadiyanto	Commissioner	Present
7.	Herry Trisaputra Zuna	Commissioner	Present
8.	Himawan Arief Sugoto*	Commissioner	Present
9.	Haru Koesmahargyo	President Director	Present
10.	Nixon L.P. Napitupulu	Vice President Director	Present
11.	Nofry Rony Poetra	Direktur Finance	Present
12.	Eko Waluyo	Director of Human Capital, Compliance and Legal	Present
13.	Setiyo Wibowo	Director of Risk Management	Present
14.	Jasmin	Director of Distribution and Funding	Present
15.	Andi Nirwoto	Director of IT and Digital	Present
16.	Hirwandi Gafar	Director of Consumer	Present
17.	Elisabeth Novie Riswanti	Director of Assets Management	Present
18.	Adi Prakoso	Audit Committee Member	Present
19.	Peter Eko Budi Darwito	Audit Committee Member	Present

Independent Party Counting and/or Validating Votes

The vote count was carried out by an independent party appointed by the Company, namely PT Datindo Entrycom as the Securities Administration Bureau and subsequently validated by Notary Yumna Shabrina, S.H. M.Kn. as Subtitute Notary of Ashoya Ratam, SH, M.Kn.

Resolutions and Realization of the 2023 Extraordinary GMS

Agenda
Approval of Changes in the Company's Management Composition.
The Minutes of Meeting stated that there was no questioner in the agenda of the meeting.
Voting Results Agree : 6.571.532.367 (88,5436487%) Disagree : 826.139.714 (11,1312584%) Abstain : 24.127.749 (0,3250930%)
Resolutions 1. Confirmed the honourable dismissal of Mr. Heru Budi Hartono as Commissioner of the Company appointed based on the 2019 EGMS dated November 27, 2019, effective October 17, 2022, with gratitude for the contribution of energy and thoughts given while serving as Commissioner of the Company. 2. Apponited Mr. Mohammad Yusuf Permana as Commissioner of the Company. 3. Honourably dismissed Mr. Andi Nirwoto as Director of IT & Digital appointed based on the 2018 GMS dated March 23, 2018 jo. EGMS 2019 dated November 27, 2019 jo. Annual GMS for Fiscal Year 2021 dated March 2, 2022, with gratitude for the contribution of energy and thoughts given while serving as Management of the Company. 4. Appointed Mr. Andi Nirwoto as Director of IT & Digital. 5. The term of office of members of the Board of Commissioners and Board of Directors appointed as referred to in points 2 and 4, in accordance with the provisions of the Company's Articles of Association, taking into account the laws and regulations in the Capital Market and without prejudice to the right of the GMS to dismiss at any time.

Agenda

6. With the confirmation of the dismissal and appointment of members of the Board of Commissioners and Board of Directors as referred to in points 1, 2, 3, and 4, the composition of the membership of the Company's Board of Commissioners and Directors shall be as follows:
   a. Board of Commissioners
      - President Commissioner/Independent Commissioner: Chandra Hamzah
      - Vice President Commissioner/Independent Commissioner : Iqbal Latanro
      - Commissioner : Andin Hadiyanto
      - Commissioner : Herry Trisaputra Zuna
      - Commissioner : Himawan Arief Sugoto
      - Commissioner : Mohamad Yusuf Permana
      - Independent Commissioner : Armand B. Arief
      - Independent Commissioner : Ahdi Jumhari Luddin
      - Independent Commissioner : Sentot A. Sentausa
   b. Board of Directors
      - President Director : Haru Koesmahargyo
      - Vice President Director : Nixon L.P. Napitupulu
      - Director of Finance : Nofry Rony Poetra
      - Director of Assets Management : Elisabeth Novie Riswanti
      - Director of Human Capital, Compliance, & Legal : Eko Waluyo
      - Director of Risk Management : Setiyo Wibowo
      - Director of Distribution & Funding : Jasmin
      - Director of IT & Digital : Andi Nirwoto
      - Director of Consumer : Hirwandi Gafar
7. The appointed members of the Board of Commissioners and Directors as referred to in points 2 and 4 can only carry out their duties after obtaining approval from the Financial Services Authority (FSA) for the Fit & Proper Test and complying with applicable laws and regulations. If the Board of Commissioners or Board of Directors of the Company is later declared disapproved as member of the Board of Commissioners or Board of Directors in the Fit & proper test by FSA, the member of the Board of Commissioners or Board of Directors of the Company is honourably dismissed from the date of the decision of the FSA Fit & Proper Test results.
8. The appointed members of the Board of Commissioners and Board of Directors as referred to in points 2 and 4 who are still holding in other positions prohibited by laws and regulations to be concurrently serving as members of the Board of Commissioners of State-Owned enterprises, the person concerned must resign or be dismissed from their positions.
9. Requested the Board of Directors to submit the written application to Financial Services Authority for the performance of the Fit and Proper Test to the appointed members of the Board of Directors and Baord of Commissioners as referred to in point 2 and 4.
10. Granted authority to the Board of Directors of the Company to restate the resolutions taken in this GMS in the form of a Notarial Deed and appear before a Notary or authorized official, and prepare the necessary adjustments or corrections as required by the competent authority for the implementation of contents of the meeting resolutions.

GMS Decisions in the Fiscal Year and 1 (One) Year Prior To the Fiscal Year Which Are Realised in the Fiscal Year

All decisions of the 2024 Financial Year GMS and the 2023 Financial Year GMS have been realized. So there is no 2023 GMS that has not been realized at the 2024 GMS.

Board of Directors

The Board of Directors is an organ in Corporate Governance implementation that is fully responsible for the management of the Company for the interests and objectives of the Company and serves as a legal representative of the Company concerning every matter and case with some restrictions as regulated by the laws, the Articles of Association of the Company, and/or the GMS resolutions. The Board of Directors is responsible for managing and determining the Company's strategic direction, utilizing and maintaining the Company's assets for the purposes and interests of the Company. Henceforth, the Board of Directors shall report the implementation of its duties and responsibilities to the Board of Commissioners.

Duties and Responsibilities of the Board of Directors

The Board of Directors is responsible for implementing all actions regarding the operations and responsibility of the Company's management for the Company's benefit in compliance with the Company's purposes and objectives and to represent the Company, both inside and outside the Court regarding all matters and all occurrences with limitations as regulated in the laws, Articles of Association, and/or GMS resolutions.

The President Director serves as Coordinator of the Board of Directors with the following duties:

1. To lead the Board of Directors meetings.
2. To create a Culture of Transparency and to facilitate constructive discussion.
3. To provide advice to members of the Board of Directors related to the effectiveness of the management.
4. To maintain good relations and solidarity among the members of the Board of Directors regarding management duties.
5. To maintain an effective and healthy relationship with the Board of Commissioners.

Each member of the Board of Directors is fully liable for any loss of the Company caused by inaccuracies or negligence from members of the Board of Directors in performing their duties. A member of the Board of Directors is not to be held accountable for the loss as mentioned above if proven that:

1. The loss is not caused by his/her fault or negligence.
2. The Director has conducted managerial undertakings in good faith and with prudence that is consistent with the Company's goals and objectives.
3. The Director has no conflict of interest, be it directly or indirectly regarding the management's action that resulted in this loss.
4. The Director has taken necessary measures to prevent this loss from arising or continuing.

The President Director is the Coordinator of the Board of Directors, with the following duties:

1. Leading the Board of Directors meeting;
2. Creating a culture of openness and facilitating constructive discussions;
3. Providing advice to members of the Board of Directors regarding the effectiveness of the implementation of management tasks;
4. Maintaining relationships and solidarity among fellow members of the Board of Directors regarding the implementation of management tasks; and
5. Maintaining effective and healthy relationships with the Board of Commissioners.

Duties and Responsibilities of the Director Supervising the Compliance Function at least include:

1. Formulating strategies to empower the Culture of Compliance;
2. Proposing Compliance policies or other Compliance principles that shall be set forth by the Board of Directors.
3. Establishing the Compliance System and procedures that shall be used to compile the Company's internal guidelines and regulations.
4. Ensuring every policy, regulation, system, and procedure, as well as business activities conducted by the Bank, has been outlined in accordance with the Bank Indonesia Regulations, Financial Services Authority, and all prevailing regulations and legislation, including Sharia Principles for Sharia Principles for Sharia Business Unit.
5. Minimizing the Company's Compliance Risks.
6. Taking preventive actions to have the policies and/or decisions made by the Bank's Board of Directors aligned with the provisions of Bank Indonesia and all prevailing laws and regulations.
7. Performing other tasks related to the Compliance Function.
8. Reporting the implementation of duties and responsibilities to the President Director, with a carbon copy to the Board of Commissioners being reported at least quarterly.

Duties and Responsibilities of Each Board of Directors

Name	Position	Field of Work
Nixon L.P. Napitupulu	President director	The President Director supervises the areas: a. Consumer b. SME and Retail Funding c. Finance d. Information Technology e. Risk Management f. SEVP Digital Business g. Internal Audit (IAD) h. Corporate Secretary (CSD)
Oni Febriarto Rahardjo	Deputy President Director	Wakil Direktur Utama menyupervisi area: a. Distribution and Institutional Funding b. Assets Management c. Human Capital, Compliance, and Legal d. Operations & Customer Experience e. SEVP Wholesale Banking f. Marketing Communication (MCD)
Nofry Rony Poetra	Director of Finance	The Finance Director supervises: a. Treasury (TRSD) b. Corporate Strategy & Planning (CSPD) c. Finance & Accounting (FAD) d. Investor Relations & Research (IRRD) e. Financial Institution & capital Market (FICD)
Elisabeth Novie Riswanti	Director of Assets Management	The Director of Assets Management supervises: a. Commercial Asset Management (CAMD) b. Consumer Collection, Recovery & Asset Sales 1 (CRSD 1) c. Consumer Collection, Recovery & Asset Sales 2 (CRSD 2) d. Procurement & Fixed Asset Management (PFAD)

Name	Position	Field of Work
Eko Waluyo	Director of Human Capital, Compliance, and Legal	The Director of Human Capital, Compliance, and Legal supervises: a. Human Capital Strategy (HCSD) b. Human Capital Management (HCMD) c. Human Capital Business Partner (HCBD) d. Learning Management (LMD) e. Compliance & Governance (CMGD) f. Legal (LGD)
Setiyo Wibowo	Director of Risk Management	The Director of Risk Management supervises: a. Retail Credit Risk (RCRD) b. Wholesale Credit Risk (WRD) c. Enterprise Risk Management (ERMD) d. Digital Operational Risk Management (DORD) e. Transformation & Partnership Management (TPMD)
Jasmin	Director of Distribution and Institutional Funding	The Director of Distribution and Institutional Funding supervises a. Large Institutional Funding (LIFD) b. Mid-size Institutional Funding (MIFD) c. Sales & Distribution (SDD) d. Regional Offices (RO)
Andi Nirwoto	Director of Information Technology	The Director of Information Technology supervises: a. IT Strategic Planning & Development (ITPD) b. IT Operation (ITOD) c. Data Management & Analytics (DMD) d. IT Security (ITSD)
Hirwandi Gafar	Director of Consumer	The Consumer Director supervises: a. Mortgage & Secured Loan (MSLD) b. Subsidized Mortgage (SMD) c. Sharia Banking (SHAD) d. Personal Banking (PBD)
Hakim Putratama	Director of Operations and Customer Experience	The Director of Operations & Customer Experience supervises: a. SEVP Operations b. Customer Experience (CXD) c. Policy & Procedure (PPD)
Muhammad Iqbal*	Director of SME and Retail Funding	Director of SME & Retail Funding supervises; a. SME Banking (SMBD) b. Retail Funding (RFD) c. Wealth Management (WMD)

* Appointed through the 2024 Annual GMS on March 6, 2024 and has passed the fit and proper test on August 8, 2024.

Rights and Authorities of the Board of Directors

The Board of Directors has the rights and authorities that have been regulated in the Work Guidelines and Manual of the Board of Directors. The rights and authorities of the Board of Directors are as follows:

1. To establish policies that are considered appropriate in the management of the Company.
2. To regulate the transfer of power of the Board of Directors t represent the Company inside and outside the Court to one or several persons specially appointed for it including the Company's employees either individually or jointly or other bodies.
3. To regulate the provisions regarding the Company's employees including the determination of wages, pensions or retirement age insurance, and other income for the Company's employees based on the applicable laws and regulations.
4. To appoint and dismiss the Company's workers based on the Company's labor rules and laws and regulations.
5. Establishing the function of Corporate Secretary.
6. Providing a decision to write off bad debts which are then reported and accounted for in the Annual Report;
7. Not collecting part or all of receivables beyond the principal in the context of credit restructuring and/or settlement but with the obligation to report to the Board of Commissioners;
8. Write off receivables for interest, fines, fees and other receivables outside the principal amount carried out in the context of restructuring and/or receivable settlement as well as other actions in the context of resolving the Company's receivables while still paying attention to prudential principles; and

9. Carrying out all actions and other actions regarding the management and ownership of the Company's assets, binding the Company with other parties and/ or other parties with the Company, including without limitation optimizing the utilization of the Company's assets, with restrictions as regulated in the statutory regulations of the Articles of Association and/ or GMS decision.

Term of Office of the Board of Directors

The term of office of members of the Board Directors is determined to be 5 (five) years and can be reappointed for 1 (one) term of office. Members of the Board of Directors are appointed for a period of time starting from the date determined by the GMS that appoints them and ending at the closing of the 5th (five) Annual GMS after the date of their appointment, by taking into account the laws and regulations in the Capital Market sector, without prejudices to the right of the GMS to at any time be able to dismiss members of the Board of Directors before the end of their term of office.

The Directors' position ends if they pass away, their term of office ends, including resigning from their position, being dismissed based on a GMS Decision, or no longer meeting the requirements as a Director based on the Articles of Association and statutory regulations, including prohibited holding concurrent positions.

Requirements of the Board of Directors

The requirements of the Board of Directors that have been regulated in the Work Guidelines and Manual are as follows:

1. Legal subjects who can be appointed as members of the Board of Directors are natural persons, who fulfill the requirements at the time of appointment and during their term of office:
   a. Fulfill material requirements, ie:
      - Expertise;
      - Integrity;
      - Leadership;
      - Experience;
      - Honest;
      - Good attitude; And
      - High dedication to advancing and developing the Company.
   b. Apart from meet the criteria as intended in point 1 above, to be appointed as a member of the Company's Board of Directors, a person must fulfill the following formal requirements:
      - Individuals;
      - Able to carry out legal actions;
      - Never been declared bankrupt within 5 (five) years prior to appointment;
      - Never been a member of the Board of Directors or member of the Board of Commissioners/ Supervisory Board who was found guilty of causing a BUMN, Subsidiary and/or other business entity to be declared bankrupt within 5 (five) years prior to appointment;
      - Never been convicted of committing a criminal act that is detrimental to the finances of the State, BUMN, Subsidiaries, other business entities and/or related to the financial sector within 5 (five) years prior to appointment;
      - Never been a member of the Board of Directors and/or member of the Board of Commissioners during his tenure:
        1) Never held an Annual GMS;
        2) Never been a member of the Board of Directors and/or member of the Board of Commissioners;
        3) Has never been accepted by the GMS or has ever failed to provide accountability as a member of the Board of Directors and/or the Board of Commissioners to the GMS; and
        4) Never has a company that obtained a permit, approval or registration from the FSA failed to fulfill its obligation to submit an annual report and/or financial report to the FSA.
   c. Having good morals and integrity;
   d. Being capable of doing legal acts;
2. Each member of the Board of Directors must meet the requirements for the fit and proper test in accordance with the Financial Services Authority Regulation (POJK) regarding the Fit and Proper Test for the Key Parties in Financial Services Institutions and have obtained a letter of approval from the Financial Services Authority.
3. All members of the Board of Directors must be domiciled in Indonesia. The President Director must come from a party who is independent of the controlling shareholders.
4. The majority of members of the Board of Directors must have at least 5 (five) years of experience in the operational field and at least as an Executive Officer of the Bank.
5. Each member of the Board of Directors must fulfill other requirements, as follows:
   a. Not an administrator of a political party, legislative candidate, and/or legislative member in the People's Representative Council, Regional Representative Council, Provincial Regional People's Representative Council, and Regency/ Municipal Regional People's Representative Council;

b. Not a candidate for head/deputy regional head and/ or head/deputy regional head, including acting head/ deputy regional head;
c. Not serving as a member of the Board of Directors of the relevant BUMN or Subsidiary for 2 (two) periods;
d. Not currently serving as an official in a Ministry/Institution, member of the Board of Commissioners/Supervisory Board in another BUMN, member of the Board of Directors in another BUMN, member of the Board of Directors in a Subsidiary and/or other business entity;
e. Not currently holding a position that is prohibited from holding a position as a member of the Board of Directors according to statutory regulations;
f. Have dedication and provide full time to carry out their duties as stated in a statement letter from the person concerned;
g. Physically and spiritually healthy (not currently suffering from an illness that could hinder the performance of their duties as a member of the Board of Directors), as proven by a health certificate from the hospital; And
h. Have a Taxpayer Identification Number (NPWP) and have carried out the obligation to pay taxes for the last two years.

Work Guidelines and Manual of the Board of Directors

In carrying out its duties and responsibilities, the Board of Directors refers to the Guidelines and Code of Conduct for the Board of Directors, which have been ratified through Special Policy Number KK.6-G on the Guidelines and Code of Conduct for the Board of Directors. Work Guidelines and Manual of the Board of Directors is a governance infrastructure that serves as a guideline for the Board of Directors in carrying out their duties, authorities, responsibilities, rights, and obligations as management of the Company. The Board of Directors' Work Guidelines and Manual is prepared based on the principles of good governance, referring to the regulations on Limited Liability Companies, the Articles of Association, and the prevailing laws and regulations that are binding on the Company.
The scope of the Work Guidelines and Manual of the Board of Directors are as follows:

Chapter I	Introduction
Chapter II	Organization and Authority A. Organization Within the Scope of the Board of Directors' Work Code of Conduct B. Organization Authority Scope of the Board of Directors' Work Code of Conduct
Chapter III	Values
Chapter IV	Work Guidelines and Manual of the Board of Directors A. Structure and Composition of the Board of Directors B. Requirements for members of the Board of Directors C. Criteria for Directors Carrying Compliance Functions D. Concurrent Positions of the Board of Directors E. Appointment and Dismissal of the Board of Directors F. Term of Office of the Board of Directors G. Duties and Responsibilities of the Board of Directors H. Obligations of the Board of Directors I. Rights and Authorities of the Board of Directors J. Actions of the Board of Directors that require the approval of the Board of Commissioners K. Mechanism of Distribution of Duties and Authorities of the Board of Directors L. Restrictions M. Transparency N. Work Ethics O. Working Hours P. Meeting Arrangements Q. Leadership R. Performance Evaluation of the Board of Directors S. Reporting and Accountability T. Committees U. Others
Chapter V	Risks and Mitigation
Chapter VI	Documentation, Administration and Reporting
Chapter VII	Monitoring
Chapter VIII	Closing

Policy of Concurrent Positions of Directors

Members of the Board of Directors are prohibited from concurrently holding positions as:
1. Member of the Board of Directors at BUMN and other business entities;
2. Member of the Board of Commissioners/ Supervisory Board of SOEs;
3. Other structural and functional positions in central and/or regional government institutions/agencies.
4. Other positions in accordance with the provisions of laws;
5. The administrator of political parties, members of the legislature, and/or regional heads/deputy regional heads;
6. other positions that may cause conflicts of interest; and/or
7. Become legislative candidates or candidates for regional heads/deputy regional heads.

Members of the Board of Directors are prohibited from concurrently serving as members of the Board of Directors, members of the Board of Commissioners, or Executive Officers at Company's, companies, and other institutions. It excludes concurrent positions in the case of the Board of Directors which is responsible for supervising the Company's participation in a subsidiary company, carrying out the functional duties of being a member of the Board of Commissioners in a non-bank subsidiary company controlled by the Company, as long as it does not result in the person concerned neglecting the implementation of duties and responsibilities as a member of the Company's Board of Directors.

Members of the Board of Directors are prohibited from concurrently serving as members of the Board of Commissioners in other companies, except:
1. Board of Commissioners in Subsidiaries/Affiliated Companies of the Company, other than as President Commissioner; and
2. Board of Commissioners in other business entities to represent/fight for the Bank's interests as long as they obtain permission from the Minister.
3. Pension Fund Supervisory Board, owned by the Company.

Members of the Board of Directors who hold dual positions in Subsidiaries and Pension Funds must obtain approval from the Board of Commissioners Meeting. (Article 15 POJK 17/2023)

Table of Concurrent Directors' Positions

Name	Position	Position in other Companies/ Institutions	Company/Other Institution Name
Nixon L.P. Napitupulu	President Directorma	-	-
Oni Febriarto Rahardjo	Vice President Director	-	-
Nofry Rony Poetra	Director of Finance	-	-
Elisabeth Novie Riswanti	Director of Assets Management	-	-
Eko Waluyo	Director of Human Capital, Compliance, and Legal	-	-
Setiyo Wibowo	Director of Risk Management	-	-
Jasmin	Director of Distribution and Institutional Funding	-	-
Andi Nirwoto	Director of Information Technology	-	-
Hirwandi Gafar	Director of Consumer	-	-
Hakim Putratama	Director of Operations and Customer Experience	-	-
Muhammad Iqbal*	Director of SME and Retail Funding	-	-

* Appointed through the 2024 Annual GMS on March 06, 2024 and has passed the fit and proper test on August 8, 2024.

Management of Conflict Interest of the Board of Directors

Each member of the Board of Directors is prohibited from taking and/or receiving personal benefits either directly or indirectly from the Company's activities, other than remuneration and other legal facilities, which are determined based on the decision of the GMS. Members of the Board of Directors are prohibited from utilizing the Company for personal, family, and /or other parties that may harm or reduce the Company's profits.

Members of the Board of Directors shall not give or offer or receive, directly or indirectly, any valuable thing to or from a customer or a Government official to influence or in exchange for what he has done and other actions, in accordance with the provisions of laws and regulations. Any member of the Board of Directors who personally in any way, whether directly or indirectly, has an interest in a transaction, a contract or a proposed contract in which the Company is a party must be declared the nature of his interest at the Meeting of the Board of Directors and therefore shall not be entitled to participate in voting in matters relating to such transaction or contract.

In the event of a conflict of interest, which is a condition where the Company's economic interests conflict with personal interests, members of the Board of Directors should always:

1. Prioritize the interest of the Company and not reduce the Bank's profits in the event of a conflict of interest.
2. Avoid making decisions in situations and conditions of conflict of interest.
3. Provide disclosures in terms of decision-making in the event of a conflict of interest.
4. Grant credit to members of the Board of Directors based on a reasonableness limit in accordance with applicable bank regulations without distinguishing from other customers (arm's length basis).
5. Report the Company's stock transactions within 3 (three) working days.

Board of Directors Meeting

Board of Directors Meeting Policy

1. The Board of Directors shall hold regular Meetings of the Board of directors at least 1 (once) a month or the so-called Scheduled Meeting of the Board of Directors (ALCO and Performance Review).
2. The Board of Directors shall schedule a meeting of the Board of Directors for the following year prior to the end of the fiscal year.
3. Scheduled Meetings of the Board of Directors must be attended by a minimum of 2/3 (two-thirds) of the total number of members of the Board of Directors.
4. The summon to the Meeting of the Board of Directors shall be made by a member of the Board of directors who is entitled to represent the Board of Directors.
5. The summon to the Meeting of the Board of Directors shall include the event, date, time, place of the meeting, and meeting materials.
6. The invitation to the Board of Directors Meeting must be made in writing and delivered or handed over directly to each member of the Board of Directors with adequate receipt, or by registered mail or by courier service, electronic means or by other fastest means no later than 5 (five) days before the meeting is held, without taking into account the date of the invitation and the date of the meeting, or within a shorter time if in urgent circumstances.
7. Meeting materials for the Scheduled meeting as referred to shall be submitted to the meeting participants no later than 5 (five) working days before the meeting is held via e-mail or other fastest means possible.
8. Meeting materials for meetings held outside the schedule shall be delivered at the time the meeting is being held at the latest.
9. The holding of Meeting of the Board of Directors may be held at any time if deemed necessary by one or more members of the Board of Directors; or upon written request from one or more members of the Board of Commissioners.
10. In the event that members of the Board of Directors are unable to physically attend the Meeting of the Board of Directors, the members of the Board of Directors may attend the meeting through teleconference, video conference, or other electronic means in accordance with the applicable provisions. In the event that the Meeting of the Board of Directors is held by means of teleconferencing technology, it must be supported by:
    a. The basis for the decision to hold the meeting using teleconferencing technology means, among others, the Bank's internal provisions and/or the minutes of the Board of Directors' Meeting.
    b. Recorded evidence of the meeting.
    c. Minutes of Meeting are signed by all meeting participants who are physically present or through teleconferencing technology.
11. At a Meeting of the board of Directors, a member of the Board of Directors may be represented only by other members of the Board of Directors based on a power of attorney. A member of the Board of Directors may only represent one other member of the Board of Directors.
12. Meetings of the Board of Directors shall be chaired at the place of domicile of the Company or the place of business activities of the Company or elsewhere in the territory of the Republic of Indonesia.
13. The Meeting of the Board of Directors shall be chaired by the President Director. If the President Director is absent or unable to attend, then:
    a. Vice President Director; or
    b. The Director appointed in writing by the President Director shall chair the meeting if, at the same time, Vice President Director is absent or unavailable; or
    c. The Director who is appointed by Vice President Director if, at the same time, the President Director

and Vice President Director are not present or unable to and the President Director does not make an appointment; or

d. If the GMS does not appoint Vice President Director, then in the event that the President Director is not present or unavailable, then one of the directors appointed in writing by the President Director shall chair the meeting; or
e. In the event that the President Director does not make an appointment, the longest-serving Director in the position as a member of the Board of Directors shall chair the Board of directors Meeting; or
f. In the event that there is more than 1 (one) Director with the longest term of office as a member of the Board of directors, then the oldest Director in terms of age shall act as the chairman of the Board of Directors Meeting.

Meeting of the Board of Directors with the Board of Commissioners

The Board of Directors must hold a joint meeting with the Board of Commissioners periodically at least 1 (once) in 4 (four) months..

Meeting of the Board of Directors Committee

Committee meetings may be conducted at any time based on the needs of the Committee and upon written request from the secretary and/or members of the Committee.

Decision-making

1. A Board of Directors meeting is valid and has the right to make binding decisions if attended and/or represented by more than ½ (one half) of the total votes cast.
2. In the event that there is more than 1 (one) proposal, a reelection will be held so that 1 (one) proposal receives more than ½ (one-half) of the total votes cast.
3. The decision-making of the Board of Directors Meeting is carried out based on deliberation and consensus.
4. In the event that no consensus is reached, the decision is made based on a vote. Decisions on a ballot must obtain a vote of more than ½ (one-half) share of the number of valid votes cast at the meeting.
5. In the Meeting of the Board of Directors, each member of the Board of Directors has the right to issue 1 (one) vote and an additional 1 (one) vote for other members of the Board of Directors that he or she represents legally.
6. A blank vote (abstention) is deemed to approve the proposal submitted at the meeting. Invalid votes are considered nonexistent and thus are not counted in determining the number of votes cast in the meeting.
7. Voting on persons shall be conducted by closed ballot papers without signatures, whereas voting on other matters shall be conducted verbally unless the Chairman of the Meeting determines otherwise without any objection based on the majority vote of the person present.
8. The Board of Directors may also take valid decisions without holding a Board of Directors Meeting provided that all members of the Board of Directors have been notified in writing and all members of the Board of Directors have given their approval regarding the proposal submitted in writing and signed the agreement in writing and signed the agreement circularly. Decisions taken in this way have the same force as decisions legally taken at a Board of Directors Meeting.
9. Every member of the Board of Directors who personally in any way, either directly or indirectly, has an interest in a transaction, contract or proposed contract in which the Company is a party must declare the nature of his interest at a Board of Directors Meeting and is therefore not entitled to participate. in voting on matters relating to the transaction or contract.
10. Decisions of the Board of Directors taken in accordance with the Work Guideline and Manual are binding and are the responsibility of all members of the Board of Directors.

Meeting Results

1. The results of the meeting must be stated in the Minutes of Meeting which contain everything discussed and decided at the meeting, including but not limited to opinions developed at the meeting, both supporting and unsupportive opinions or different opinions (dissenting opinions), as well as the reasons for the absence of members of the Board of Directors , if there are. The minutes of the meeting must be drawn up by someone present at the meeting appointed by the Chairman of the Meeting and then signed by all members of the Board of Directors present and submitted to all members of the Board of Directors
2. In the event that there is a member of the Board of Directors who does not sign the Minutes of meeting, the person concerned shall write the reasons in a separate letter attached to the Minutes of Meeting.
3. Minutes of Directors' Meetings are valid evidence for members of the Board of Directors and for third parties regarding the decisions taken at the meeting in question.
4. A copy of the minutes of the meeting must be given to each member of the Board of Directors, whether the person concerned is present or not present at the Board of Directors meeting.
5. Original minutes of Board of Directors meetings must be documented and kept by the Company.
6. The number of board meetings and the number of attendance of each member of the Board of Directors must be submitted in the Annual Report.

Board of Directors Meeting Plan

The Board of Directors meeting plan based on the Company's Articles of Association, has agreed that the Board of Directors Meetings in 2025 will be held at least 1 (one) time per month and/ or as needed. The Board of Directors also holds meetings with the Committees under the Board of Directors which are scheduled according to the need.

The Board of Directors shall hold regular Board of Directors meetings at least 1 (one) time every month or what is called a Scheduled Board of Directors Meeting (Performance Review), scheduled for the following year before the end of the financial year. The agenda discussed at least includes:

1. Preparation of Bank Business Plan (RBB) and Company Budget Work Plan (RKAP).
2. Regularly review the Company's performance.
3. Implementation of the AML, CFT, and PFWMD Programs.
4. Implementation of Corporate Governance and Follow-up on Internal and External Audit findings.

The Board of Directors must plan the Scheduled Meeting of the Board of Directors for the following year before the end of the financial year. In making decisions, scheduled meetings of the Board of Directors must be attended by at least 2/3 of the total number of members of the Board of Directors.

Invitations to meetings of the Board of Directors are made in writing and delivered directly to each member of the Board of Directors no later than 5 (five) days before the meeting is held. Meeting materials are delivered to the meeting participants no later than 5 (five) working days before the meeting is held via email or other electronic means.

Internal Meeting of the Board of Directors

Throughout 2024, the agenda, dates, and participants of the internal meetings of the Board of Directors are as follows.

Table of Internal Board of Directors Meetings

No.	Date	Agenda			
			NPN	OFR	
1.	January 2, 2024	Discussion on the Plan for the 2023 Fiscal Year Annual General Meeting of Shareholders (AGMS).	1	1	
2.		BTN Changes in BTN Grade Structure	1	1	
3.		Presentation of the 2023 BRRM ExeLeave taking ve Summary	1	1	
4.	January, 8 2024	General Agenda	1	1	
5.		Presentation of BTN SLE Index	1	1	
6.		*CIF Data Cleansing*	1	1	
7.		BTN Anniversary Celebration	1	1	
8.		Procurement of Due Diligence Consultant for BMI	1	1	
9.	January, 15 2024	Investor Communication Plan 2024	Excusal	1	
10.		Annual Report Progress Update	Excusal	Excusal	
11.		Presentation of BTN's New Logo Rebranding	1	1	
12.		Performance Review in December 2023	Excusal	1	
13.	January, 22 2024	Update of the Joint Agreement (SKB) on the Guidelines for the Working Relationship Pattern between the Board of Commissioners and the Board of Directors.	Official Duty	1	
14.		Progress of the Company's Cultural Transformatio	Official Duty	1	
15.	January, 23 2024	Presentation of BTN's New Master Logo	1	1	
16.		Discussion on the 2024–2026 RBB Materials with OJK (Financial Services Authority)	1	1	
17.		Accrued Interest Development	1	1	
18.	January, 29 2024	Proposal for the 2024 Remuneration of the Board of Directors and Board of Commissioner	1	1	
19.		Update on the Annual Report Completion	1	1	
20.		BTN Anniversary Celebration	1	1	
21.		Report on the Implementation of Project Tiger and Documentation Structuring	1	1	
22.		Discussion on the 2024 Collegial KPI and the Achievement of Collegial and Directorate KPI	1	1	
23.		Risk Assessment & Collection Strategy Following the Announcement of the Extension of Covid-19 Restructuring Relaxation	1	1	
24.	February, 2 2024	Rebranding Proposal for BTN's New Logo	1	Excusal	

	Name								
	SWB	HRG	JSM	ENR	AND	EW	NRP	HP	MIQ*
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	1	Official Duty	Official Duty	1	Leave Taking	1	1	1	
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No.	Date	Agenda			
			NPN	OFR	
25.	February, 5 2024	Financial Report on January 31, 2024	1	1	
26.		Regional Office Expansion Plan	1	1	
27.		Strategy for Increasing Third-Party Funds (DPK) in the Midsize Institution Segment for 2024	1	1	
28.	February, 6 2024	KPTI	1	1	
29.	February, 13 2024	Manpower Planning for 2024	1	1	
30.		Achievement of Collegial & Directorate KPIs for 2023	1	1	
31.	February 19, 2024	Meeting of the Founders, Supervisory Board, and Management of BTN Pension Fund	1	Official Duty	
32.		Update on the Preparation Progress for the General Meeting of Shareholders (GMS	1	Official Duty	
33.		BTN Paylater Product Initiativ	1	Official duty	
34.		Update Project Decision Engine Consumer	1	Official duty	
35.	February 20, 2024	*Performance Review January 2024*	1	Official duty	
36.	February 26 2024	General Agenda	1	1	
37.		*Project Camel Update*	1	1	
38.		*Wholesale Funding Management Strateg*	Excusal	1	
39.		*Update on Account Novatio*	Excusal	1	
40.		Achievement of Work Unit KPI Scores	1	1	
41.	March 4, 2024	Discussion on Watchlist Debtor	Excusal	1	
42.		Legal Review of PKPU/Bankruptcy Regulation	1	1	
43.	March 13, 2024	Proposal for Board of Directors (BOD) Facilities	Excusal	1	
44.		Proposal for Organizational Structure Changes	1	1	
45.	March 14, 2024	Performance Review February 2024	1	1	
46.	March 18, 2024	General Agenda	1	1	
47.		Post-Implementation Review of Mobile Banking After the February 2023 Release	1	1	
48.		Project Camel Update	1	Excusal	
49.		Update on Jakarta International Marathon Event	1	Excusal	
50.	March 25 2024	Improvement of the KUR Process	1	1	
51.	April 1, 2024	General Agenda	1	1	
52.		Results of the Limited Due Diligence for the Spin-Off of BTN's UUS	1	1	
53.		Eid Mubarak 2024 Preparation	1	1	
54.		Formulation of BTN's Long-Term Corporate Plan (RJPP) 2025–2029	1	1	
55.		Update on the Proposed Layout Allocation for the Ground Floor of BTN Tower 2	1	1	
56.	April 22 2024	Project Camel Update	Official duty	1	
57.	April 23 2024	Performance Review Maret 2024	1	1	
58.	April 30 2024	Update on Leadership Forum Activities	1	1	
59.		Update on the KC Banjarmasin Cae	1	1	
60.	May 6 2024	General Agenda	1	1	
61.		Structure of Committees Under the Board of Directors	1	1	
62.		Update on the Construction Project and Centralization of Rental Vehicles	1	Excusal	

Name									
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	Official duty	Excusal	1	1	1	Excusal	Excusal	1	
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	1	Excusal	1	1	1	1	1	1	1
	1	1	1	1	1	Excusal	1	1	1
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	Official duty	1	1	1	1	1	Official duty	1	1
	Official duty	1	1	1	1	1	1	1	1
	1	Excusal	1	1	Excusal	1	1	1	1
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No.	Date	Agenda			
			NPN	OFR	
63.	May 13, 2024	General Agenda	1	Official duty	
64.		Proposal for the Development of SHAD Organizational Structure	1	Official duty	
65.		Approval of Excusal Principle for the Construction of JKT Kebon Jeruk and KC Kelapa Gading Square	1	Official duty	
66.		Update on BTN's Investment Plan in IKN (Indonesia's New Capital	1	Official duty	
67.	May 14, 2024	Performance Review April 2024	1	Official duty	
68.	May 20, 2024	Changes in Income and Official Duty Travel Facilities for the Board of Directors (BOD)	1	1	
69.		BTN Vision, Mission & Corporate Strategy 2025–202	1	1	
70.		Adjustment of Directorate & SEVP KPIs for 2024	1	1	
71.		Approval of the Facade for KC Kebon Jeruk and KC Kelapa Gading	1	1	
72.		General Agenda	1	1	
73.	May 22 2024	Project Camel Update	1	Official duty	
74.		Proposal for the Subsidized Mortgage (KPR) Schem	1	Official duty	
75.		Subdebt Simulation Impact on CAR in the 2024 RKA	1	Official duty	
76.	May 27 2024	Update on BTN's Long-Term Corporate Plan (RJPP) 2025–2029	1	1	
77.		Update on the Company Profile Production	1	1	
78.	May 28 2024	KPTI	1	1	
79.	June 3, 2024	General Agenda	1	1	
80.		Update on Jakarta International Marathon Event	1	1	
81.		Proposal for Asset Buying Credit, Channeling Partner, & Personal Banking Sales Model	1	1	
82.		Proposal for Amendments to the 2024 RKAP (Annual Budget and Business Plan)	1	1	
83.	June 10, 2024	General Agenda	1	1	
84.		Update on Cash Management	1	1	
85.		Presentation of the Uniform Design for PBO and BTN Prospera Debit Card	1	1	
86.		Service Disruption Report at Outlets	1	1	
87.		Selection of the Winning Design for the Frontliner Blazer Uniform for Fridays	1	1	
88.	June 11 2024	Performance Review in May 2024	1	1	
89.	June 12 2024	Proposal for Amendments to the 2024 RKAP (Annual Budget and Business Plan)	1	1	
90.	June 15 2024	Proposal for Amendments to the 2024 RKAP (Annual Budget and Business Plan)	1	1	
91.	June 19 2024	BTN Prospera	Excusal	1	
92.		Proposal for Amendments to the 2024 RKAP (Annual Budget and Business Plan)	1	1	
93.	June 24, 2024	Update on the Audit of the Fraud Case at KC BSD	1	1	
94.		Guidance on the Cawang 2 Case	1	1	
95.	July 1, 2024	Project Kick-Off and Progress Update on Digital Branch	1	1	
96.		DIRE Tokenization Plan	1	1	
97.		Proposal for Amendments to Directorate, Work Unit, and Individual KPIs for Semester II of 2024	1	1	
98.		Proposal for BTN Syariah Capital Plan	1	1	
99.		Anticipation of Ransomware LockBit 3.0 Attacks	1	1	

	Name								
	SWB	HRG	JSM	ENR	AND	EW	NRP	HP	MIQ*
	Official duty	1	1	1	1	1	1	Excusal	1
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	Official duty	1	1	1	Leave taking	Official duty	1	Official duty	1
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No.	Date	Agenda			
			NPN	OFR	
100.	July 9, 2024	Discussion on Gap Analysis for the Spin-Off of BTN's Sharia Business Unit (UUS)	Excusal	1	
101.		Update on the Fraud Case at KCS Makassar	1	1	
102.		Adjustment of RA RT for 2024	1	1	
103.		Request for Excusal Principle in the Procurement of Fraud Detection SystemPengadaan Fraud Detection System	Excusal	1	
104.	July 15, 2024	Update on the Termination of BTN RDN by KSEI	Study	1	
105.		Performance Review for June 2024	Study	1	
106.	July 22, 2024	Kick Off Meeting GRC Roadmap	1	1	
107.	July 29, 2024	General Agenda	1	Excusal	
108.		Strategy for Increasing Savings	1	1	
109.	July 30, 2024	Amendments to Collegial KPI of the Board of Directors for 2024	1	Excusal	
110.	August 6, 2024	General Agenda	1	Study	
111.		Strategy for Increasing Savings	1	Study	
112.	August 12, 2024	Plan for the Relocation of the Board of Directors to BTN Tower 2 and Establishment of the BTN Tower Re-Facade Project	Excusal	1	
113.		Proposal for Joint Financing Collaboration with Bank Banten	1	1	
114.		Strategy for Increasing FBI and Reducing CoF	1	1	
115.		Progress Update on Syariah Mobile Banking	1	1	
116.		General Agenda	1	1	
117.	August 13, 2024	Performance Review for July 2024	1	1	
118.	August 19, 2024	Update on Progress Due Diligence Acquisition of Sharia Commercial Banks (Project Hijra)	1	1	
119.		Update on the Digital Branch Project	1	1	
120.		Financial Posture Scenario for BTN 2025-2029	1	1	
121.		Update on the Rebranding of the New Logo at KC and KCP	1	1	
122.	September 2, 2024	RJPP 2025-2029	Official duty	1	
123.		General Agenda	Official duty	1	
124.	September 9, 2024	General Agenda	Official duty	1	
125.		Update on the Progress of Office Network Rebranding	Official duty	1	
126.		Implementation of Electronic Certificates	Official duty	1	
127.	September 10, 2024	Performance Review for August 2024	1	1	
128.		Naming Wholesale Portal	1	1	
129.	September 17, 2024	BTN Pension Fund Remuneration	1	1	
130.		Naming of Meeting Room on the 32nd Floor of BTN Tower 2	1	1	
131.		Kick-Off Meeting for Financial Statement Audit	1	1	
132.		Update on Online Onboarding Progress	1	1	
133.		Mobile Banking Acquisition Program	1	1	
134.		General Agenda	1	1	
135.	September 23, 2024	General Agenda	Official duty	1	
136.		RJPP 2025-2029	Official duty	1	
137.	Septembr 24, 2024	KPTI	Official duty	1	
138.	October 1, 2024	General Agenda	1	1	
139.	October 7, 2024	General Agenda	1	Official duty	
140.		Update on Project Hijra Progress	1	Official duty	

Name									
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No.	Date	Agenda			
			NPN	OFR	
141.	October 8, 2024	Performance Review for September 2024	1	Official duty	
142.	October 14, 2024	General Agenda	1	1	
143.		Update on Project Tiger	1	1	
144.		Improvement of SLA Process for Non-Subsidized Loans	1	1	
145.		Update on ICOFR Project	1	1	
146.		Update on BTN's Collaboration with PT Pos Indonesia	1	1	
147.	October 21, 2024	General Agenda	1	1	
148.		Update on Project Tiger	1	1	
149.		Plan for Global Bond Issuance	1	1	
150.		Update Lesson Learned System Down BTN Mobile	1	1	
151.	October 28, 2024	General Agenda	Official duty	1	
152.		Renaming Superapp, Wholesale Portal, and Internet Banking Business	Official duty	1	
153.	November 4, 2024	General Agenda	1	1	
154.		Evaluation Report on AML, CFT, and PFWMD Implementation for 2024	1	1	
155.		GRC Roadmap 2025-2029	1	1	
156.		Update on Soft Launching and Renaming of Super Apps BTN Mobile	1	1	
157.		Update on PPJB Completion	1	1	
158.	November 11, 2024	Strategy for Managing and Allocating CKPN for Watchlist Debtors 2025	Official duty	1	
159.		Discussion on Draft Code of Conduct Proposal	Official duty	1	
160.		Performance Review of BTN Pension Fund until September 2024 and BTN Pension Fund Roadmap Initiative	Official duty	1	
161.		General Agenda	1	1	
162.		Update on Implementation of Integrated End-to-End Procurement Application	1	1	
163.	November 12, 2024	Performance Review for October 2024	1	1	
164.	November 18, 2024	General Agenda	1	1	
165.		Preparation of RKAP 2025	1	1	
166.		Capital Call	1	1	
167.	November 21, 2024	Finalization of RKAP 2025	1	1	
168.	Novmber 25, 2024	General Agenda	1	1	
169.		Update on KU.2 Policy Regarding Treasury, Funding, and Product Delivery	1	1	
170.		Exit Meeting for Limited Review of September 2024 Financial Statements	1	1	
171.	November 28, 2024	KPTI	1	1	
172.	December 3, 2024	Update on BTN Syariah Spin-Off	1	1	
173.		Update on Fraud Case at KC Harapan Indah	1	1	
174.	December 5, 2024	Nominated Talent BUMN	1	1	
175.	December 9, 2024	General Agenda	Leave taking	1	
176.		Performance Review November 2024	Leave taking	1	
177.		Approval for the Update of KU.9, KU.7, KU.3, and KU.1 Policies	Leave taking	1	
178.	December 16, 2024	General Agenda	1	1	
179.		Establishment of RA RT 2025	1	1	
180.		Implementation of Write-Off (Hapustagih)	1	1	

Name									
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	1	1	1	1	1	1	1	1	1
	1	1	1	1	1	1	1	1	1
	1	1	1	1	Excusal	Official duty	1	1	1
	1	1	1	1	Excusal	Official duty	1	1	1
	1	1	1	Official duty	1	1	1	1	1
	1	1	1	Official duty	1	1	1	1	1
	1	1	1	Official duty	1	1	1	1	1
	1	1	1	Official duty	1	1	1	1	1
	1	1	1	Official duty	1	1	1	1	1
	1	Official duty	Official duty	Official duty	Official duty	1	1	1	1
	1	Official duty	Official duty	Official duty	Official duty	1	1	1	1
	1	Official duty	Official duty	Official duty	Official duty	1	1	1	1
	1	Official duty	1	Official duty	Official duty	1	1	1	1
	1	Official duty	1	Official duty	Official duty	1	1	1	1
	1	Official duty	1	Official duty	Official duty	1	1	1	1
	1	Official duty	1	Official duty	1	1	1	1	1
	1	Official duty	1	Official duty	1	1	1	1	1
	1	Official duty	1	Official duty	1	1	1	1	1
	1	1	1	1	1	1	1	1	1
	1	Official duty	1	1	1	Leave taking	1	1	1
	1	Official duty	1	1	1	Leave taking	1	1	1
	1	Official duty	1	1	1	Leave taking	1	1	1
	1	1	1	Official duty	1	Leave taking	1	1	1
	1	1	1	1	1	Official duty	1	1	1
	1	1	1	1	1	Official duty	1	1	1
	Official duty	1	1	1	1	1	1	1	1
	1	1	1	1	1	Official duty	1	1	Official duty
	1	1	1	1	1	Official duty	1	1	Official duty
	1	1	1	1	1	1	1	1	Official duty
	1	1	1	1	1	1	1	1	Official duty
	1	1	1	1	1	1	1	1	Official duty
	1	1	1	1	1	1	1	1	1

No.	Date	Agenda			
			NPN	OFR	
181.	December 23, 2024	General Agenda	1	1	
182.		Decision on Cost and Benefit of Project Tiger and Transaction Scheme	1	1	
183.		Repayment of 9 Debtors in Project Tiger	1	1	
184.		Project Hijra	1	1	
185.		Conversion of RAK Transaction Account to RAK Business Fund Account	1	1	
186.		Contingency Plan for KC Harapan Indah Case	Official duty	1	
187.	December 30, 2024	General Agenda	1	1	
188.		Proposal for Collegial KPI of the Board of Directors for 2025	1	1	
189.		Update on Preparation for the National Working Meeting (Rakernas)	1	1	
190.		Settlement of Discrepancy Accounts and Long Outstanding Accounts	1	1	
191.		Update on the Preparation for Junior Global Bond Issuance	1	1	

** Diangkat melalui RUPS Tahunan 2024 tanggal 06 Maret 2024 dan telah lulus *fit and proper test* tanggal 8 Agustus 2024.

BOARD OF COMMISSIONERS MEETING WITH DIRECTORS

Throughout 2024, the agenda, dates and participants of the joint meeting of the Board of Directors and the Board of Commissioners were as follows.

No.	Meeting Date	Meeting Agenda	
1.	February 21, 2024	a. Review of the Bank's overall performance up to January 2024; b. UUS Performance Review up to January 2024; c. Monitoring of Risk Appetite, Risk Tolerance, and Recovery Plan Bankwide and UUS up to January 2024; d. Progress of Corporate Plan Initiatives in 2024; e. CIF Data Cleansing.	
2.	April 24, 2024	a. UUS Performance Review until March 2024; b. Monitoring of Risk Appetite, Risk Tolerance, and Recovery Plan Bankwide and UUS until March 2024; c. Progress on the Implementation of Corporate Plan Initiatives including the Discussion of Low-Cost Fund Raising Strategy (CASA); d. Progress of Customer Identification FIle (CIF) Improvement by March 2024; e. Monitoring the Completion of Principal Credit Documents in the Out of Tolerance Threshold (LAT) category until March 2024; f. Progress Update of Rebranding Project; g. Progress Update Project Camel;	

Name									
	SWB	HRG	JSM	ENR	AND	EW	NRP	HP	MIQ*
	1	1	1	1	1	1	1	1	1
	1	1	1	1	1	1	1	1	1
	1	1	1	1	1	1	1	1	1
	1	1	1	1	1	1	1	1	1
	1	1	1	1	1	1	1	1	1
	1	Official duty	1	Official duty	1	1	1	1	1
	1	1	1	Leave taking	1	1	1	1	Excusal
	1	1	1	Leave taking	1	1	1	1	Excusal
	1	1	1	Leave taking	1	1	1	1	Excusal
	1	1	1	Leave taking	1	1	1	1	Excusal
	1	1	1	Leave taking	1	1	1	1	Excusal

	Board of Directors		Board of Commissioners	
	Meeting Attendees	Attendance	Meeting Attendees	Attendance
	1. Nixon L.P. Napitupulu 2. Oni Febriarto Rahardjo 3. Andi Nirwoto 4. Elisabeth Novie Riswanti 5. Jasmin 6. Setiyo Wibowo 7. Hirwandi Gafar 8. Nofry Rony Poetra 9. Eko Waluyo 10. Hakim Putratama	1. Present 2. Not Present 3. Present 4. Present 5. Present 6. Not Present 7. Present 8. Not Present 9. Present 10. Present	1. Chandra M. Hamzah 2. Iqbal Latanro 3. Armand B. Arief 4. Sentot A. Sentausa 5. Andin Hadiyanto 6. Herry Trisaputra Zuna 7. Himawan Arief Sugoto 8. M. Yusuf Permana	1. Present 2. Not Present 3. Present 4. Present 5. Present 6. Not Present 7. Present 8. Not Present
	1. Nixon L.P. Napitupulu 2. Oni Febriarto Rahardjo 3. Andi Nirwoto 4. Elisabeth Novie Riswanti 5. Jasmin 6. Setiyo Wibowo 7. Hirwandi Gafar 8. Nofry Rony Poetra 9. Eko Waluyo 10. Hakim Putratama 11. Muhammad Iqbal	1. Present 2. Present 3. Present 4. Present 5. Present 6. Not Present 7. Present 8. Present 9. Present 10. Present 11. Present as an Observer	1. Chandra M. Hamzah 2. Iqbal Latanro 3. Armand B. Arief 4. Sentot A. Sentausa 5. Andin Hadiyanto 6. Herry Trisaputra Zuna 7. Himawan Arief Sugoto 8. Adi Sulistyowati 9. Bambang Widjanarko	1. Present 2. Present 3. Not Present 4. Present 5. Present 6. Present 7. Present 8. Not Present 9. Present as an Observer

No.	Meeting Date	Meeting Agenda	
3.	June 19, 2024	a. Bankwide Performance Review up to May 2024 including Prognosis for the second quarter of 2024; b. UUS Performance Review up to May including Prognosis for the second quarter of 2024; c. Monitoring of Risk Appetite, Risk Tolerance, and Recovery Plan Bankwide and UUS up to May 2024; d. Progress of Corporate Plan Initiative Implementation including Profitability Aspects up to May 2024; e. Progress of Customer Data or Customer Identification FIle (CIF) Improvement by May 2024; f. Monitoring of Completion of Basic Credit Documents (LAT, SKMHT, and PPJB) up to May 2024; g. Camel Project Update Progress and UUS Spin-Off Preparation.	
4.	August 21, 2024	a. Bankwide Performance Review until July 2024; b. UUS Performance Review up to July 2024; c. Monitoring of Risk Appetite, Risk Tolerance, and Recovery Plan Bankwide and UUS until July 2024; d. Progress of Corporate Plan Initiative Implementation including Profitability Aspects up to July 2024; e. Progress of Customer Data or Customer Identification File (CIF) Improvement up to July 2024; f. Progress of Camel 2.0 Project Update and UUS Spin-off Preparation.	
5.	October 16, 2024	a. Collegial achievement of KPIs of the Board of Directors up to the third quarter of 2024; b. Bankwide Performance Review and KPI Achievement up to September 2024; c. Performance Review of UUS up to September 2024; d. Monitoring of Risk Appetite, Risk Tolerance, and Recovery Plan Bankwide and UUS up to September 2024; e. Progress of Corporate Plan Initiative Implementation including Profitability Aspects up to September 2024; f. Progress of Customer Data or Customer Identification File (CIF) Improvement as of September 2024; g. Evaluation and Monitoring of New Bank Products (PPB) and Activities for the Benefit of the Bank (KuKB) including Profitability Aspects up to September 2024; h. Monitoring the Completion of Credit Document Categories Outside the Tolerance Threshold (LAT, PPJB, and SKMHT) until September 2024; i. Progress Update on Project Hijra and Preparation of UUS Spin-off;	
6.	December 18, 2024	a. Bankwide Performance Review to November 2024 and Projection to December 2024, including deepening of funding and collection strategies; b. UUS Performance Review up to November 2024 and Projection to December 2024; c. Monitoring of Bankwide and UUS Risk Appetite, Risk Tolerance, and Recovery Plan up to November 2024 and submission of Bankwide Risk Appetite, Risk Tolerance, and Recovery Plan 2025; d. Progress of Implementation of Corporate Plan Initiatives including Profitability Aspects up to November 2024; e. Progress of Internal Control Over Financial Reporting (ICOFR) Implementation in accordance with Regulations and Follow-up Monitoring of ICOFR Diagnostic Review; f. Progress Update on Project Hijra and Preparation of UUS Spin-off; g. Proposed Use of Limit and Implementation of Write-off.	

The implementation of joint meetings of the Board of Commissioners and the Board of Directors throughout 2024 is presented in the Board of Commissioners Meetings section of the Corporate Governance Chapter in this Annual Report.

	Board of Directors		Board of Commissioners	
	Meeting Attendees	Attendance	Meeting Attendees	Attendance
	1. Nixon L.P. Napitupulu 2. Oni Febriarto Rahardjo 3. Andi Nirwoto 4. Elisabeth Novie Riswanti 5. Jasmin 6. Setiyo Wibowo 7. Hirwandi Gafar 8. Nofry Rony Poetra 9. Eko Waluyo 10. Hakim Putratama 11. Muhammad Iqbal	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present as an Observer	1. Chandra M. Hamzah 2. Iqbal Latanro 3. Armand B. Arief 4. Sentot A. Sentausa 5. Andin Hadiyanto 6. Herry Trisaputra Zuna 7. Himawan Arief Sugoto 8. Adi Sulistyowati 9. Bambang Widjanarko	1. Present 2. Not Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present as an Observer 9. Present as an Observer
	1. Nixon L.P. Napitupulu 2. Oni Febriarto Rahardjo 3. Andi Nirwoto 4. Elisabeth Novie Riswanti 5. Jasmin 6. Setiyo Wibowo 7. Hirwandi Gafar 8. Nofry Rony Poetra 9. Eko Waluyo 10. Hakim Putratama 11. Muhammad Iqbal	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	1. Chandra M. Hamzah 2. Iqbal Latanro 3. Armand B. Arief 4. Sentot A. Sentausa 5. Andin Hidayanto 6. Herry Trisaputra Zuna 7. Himawan Arief Sugoto 8. Adi Sulistyowati 9. Bambang Widjanarko	1. Present 2. Present 3. Present 4. Present 5. Not Present 6. Present 7. Present 8. Present as an Observer 9. Present as an Observer
	1. Nixon L.P. Napitupulu 2. Oni Febriarto Rahardjo 3. Andi Nirwoto 4. Elisabeth Novie Riswanti 5. Jasmin 6. Setiyo Wibowo 7. Hirwandi Gafar 8. Nofry Rony Poetra 9. Eko Waluyo 10. Hakim Putratama 11. Muhammad Iqbal	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	1. Chandra M. Hamzah 2. Iqbal Latanro 3. Armand B. Arief 4. Sentot A. Sentausa 5. Andin Hadiyanto 6. Herry Trisaputra Zuna 7. Himawan Arief Sugoto 8. Adi Sulistyowati 9. Bambang Widjanarko	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present
	1. Nixon L.P. Napitupulu 2. Oni Febriarto Rahardjo 3. Andi Nirwoto 4. Elisabeth Novie Riswanti 5. Jasmin 6. Setiyo Wibowo 7. Hirwandi Gafar 8. Nofry Rony Poetra 9. Eko Waluyo 10. Hakim Putratama 11. Muhammad Iqbal	1. Not Present 2. Present 3. Present 4. Present 5. Not Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	1. Chandra M. Hamzah 2. Iqbal Latanro 3. Armand B. Arief 4. Sentot A. Sentausa 5. Andin Hadiyanto 6. Herry Trisaputra Zuna 7. Himawan Arief Sugoto 8. Adi Sulistyowati 9. Bambang Widjanarko	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Not Present 9. Present

Frequency and Attendance of Board of Directors Meetings

Table of Frequency and Attendance of Board of Directors Meetings

Name	Position	Board of Directors Meetings			Joint Meetings of the Board of Directors and the Board of Commissioners			GMS		
		Number and Percentage of Attendance			Number and Percentage of Attendance			Number and Percentage of Attendance		
		Number of Meetings	Number of Attendances	Persentase	Number of Meetings	Number of Attendances	Persentase	Number of Meetings	Number of Attendances	Persentase
Nixon L.P. Napitupulu	President Director	191	158	82.72%	6	5	83.34%	1	1	100%
Oni Febriarto Rahardjo	Vice President Director	191	166	86.91%	6	5	83.34%	1	1	100%
Nofry Rony Poetra	Director of Finance	191	179	93.72%	6	5	83.34%	1	1	100%
Elisabeth Novie Riswanti	Director of Assets Management	191	165	86.39%	6	6	100%	1	1	100%
Eko Waluyo	Director of Human Capital, Compliance, and Legal	191	149	78.01%	6	6	100%	1	1	100%
Setiyo Wibowo	Director of Risk Management	191	165	86.39%	6	4	66.67%	1	1	100%
Jasmin	Director of Distribution and Institutional Funding	191	182	95.29%	6	5	83.34%	1	1	100%
Andi Nirwoto	Director of Information Technology	191	156	81.68%	6	6	100%	1	1	100%
Hirwandi Gafar	Director of Consumer	191	162	84.82%	6	6	100%	1	1	100%
Hakim Putratama	Director of Operations and Customer Experience	191	178	93.19%	6	6	100%	1	1	100%
Muhammad Iqbal*	Director of SME and Retail Funding	149	124	83.22%	5	5	100%	-	-	-

* Appointed through the 2024 Annual General Meeting of Shareholders (AGMS) on March 6, 2024, and passed the fit and proper test on August 8, 2024.

Training and/or Improving the Competence of Board of Directors Members

The policy on mandatory training and/or competency improvement for members of the Board of Directors has been regulated in the Good Corporate Governance Guidelines. The training program for members of the Board of Directors includes:

1. Members of the Board of Directors are required to participate in a continuous competency development program either domestically or abroad with the aim of improving competency and knowledge in relation to supporting the implementation of duties, obligations, and responsibilities.
2. The continuous competency development plan for members of the Board of Directors is stated in the annual work program of the Board of Directors.
3. In the event that continuing education is carried out outside the established work program, then continuous competency development must be decided by the Board of Directors.
4. Members of the Board of Directors who have carried out continuous competency development are required to submit a written report on the results of the competency development to the Board of Commissioners or submitted at a Board of Directors Meeting.
5. New members of the Board of Directors are required to participate in the Company's orientation program;
6. Other matters concerning facilities for the implementation of continuous education refer to the Company's regulations.

The training and/or competency improvement that the Board of Directors has participated in during 2024 is as follows.

Name	Position	Types of Training and Development Materials Competency / Training	Time and place Implementation	Organizer
Nixon L.P. Napitupulu	President Director	BTN Leadership Forum 2 - 2024	Bali, May 2-4, 2024	Mc Kinsey & PwC
		Alignment of Risk Management Certification Level 7	Jakarta, May 15-16, 2024	Indonesia Risk Professional Association (IRPA)
		ExeLeave Taking – Strategic Management and Leadership Cohort 2 - 2024	Jakarta, July 3-16, 2024	Universitas Pertahanan RI
		Global Leadership Program by SRW&Co - IESE Business School	Barcelona, Spain, September 2-6, 2024	SRW&Co - IESE
Oni Febriarto Rahardjo	Vice President Director	Risk Management Refreshment Level 7	Jakarta, February 7 2024	PT Garda Multi Talenta
		BTN Leadership Forum 2 - 2024	Bali, May 2-4, 2024	Mc Kinsey & PwC
		Strategic Decision - Making for Leaders	Cambridge, United Kingdom, October 7-9, 2024	Cambridge Judge Business School
Nofry Rony Poetra	Director of Finance	Risk Management Refreshment Level 7	Jakarta, Januay 24 2024	PT Garda Multi Talenta
		Pathways to Chartered Accountant Indonesia	Jakarta, March 1 2024	BUMN School of Excellence (BSE)
		BTN Leadership Forum 2 - 2024	Bali, May 2-4 2024	Mc Kinsey & PwC
		Risk Management Refreshment Certification Level 7	Jakarta, May 15-16 2024	Indonesia Risk Professional Association (IRPA)
		Refreshment of Treasury Certification Level 7	Jakarta, August 15 2024	ACI Financial Markets Association
Elisabeth Novie Riswanti	Director of Assets Management	Risk Management Refreshment Level 7	Jakarta, January 24 2024	PT Garda Multi Talenta
		BTN Leadership Forum 2 - 2024	Bali, May 2-4 2024	Mc Kinsey & PwC
		ExeLeave taking ve Risk Management Program - Europe	Milan - La Spezia - Roma, Italy, November 9-18, 2024	Lembaga Pengembangan Perbankan Indonesia (LPPI)

Name	Position	Types of Training and Development Materials Competency / Training	Time and place Implementation	Organizer
Eko Waluyo	Director of Human Capital, Compliance, and Legal	Technical Guidance on Human Capital Certification in Indonesia	Jakarta, February 9 2024	Forum Human Capital Indonesia (FHCI)
		Competency Assessment for HC Certification – HR Director Scheme	Jakarta, March 22 2024	Forum Human Capital Indonesia (FHCI)
		Risk Management Refreshment Level 7	Jakarta, March 27-28 2024	Indonesia Risk Professional Association (IRPA)
		Competency Test for Risk Management Certification Level KKNI 7	Jakarta, March 28 2024	Lembaga Pengembangan Perbankan Indonesia (LPPI)
		Seminar: "Pension Fund Investment in Facing Interest Rate Dynamics"	Jakarta, April 25 2024	Asosiasi Dana Pensiun Indonesia
		BTN Leadership Forum 2 - 2024	Bali, 2 – 4 Mei 2024	Mc Kinsey & PwC
		Webinar "Aligning the Tension of Interest – the main issue on achieving objectives"	Jakarta, July 20 2024	Institut Akuntan Manajemen Indonesia (IAMI)
		Global Leadership Program by SRW&Co - IESE Business School	Barcelona, Spain, 2 – 4 September 2024	SRW&Co - IESE
		Empowering the Future Workforce : Innovation, Resilience & Employee Well-being to make a Respectful Workplace	Bali, September 19-20 2024	Forum Human Capital Indonesia (FHCI)
Setiyo Wibowo	Director of Risk Management	Risk Management Refreshment Level 7	Jakarta, February 7 2024	PT Garda Multi Talenta
		Ideas Asia Pacific by UID-MIT Sloan	Manila, USA, March 21 2024	Unity in Diversity
		Ideas Asia Pacific 2024 "Co-Initiating Module Orientation Workshop"	Boston, USA, April 23-26, 2024	UID Bali
		BTN Leadership Forum 2 - 2024	Bali, May 2, 2024	Mc Kinsey & PwC
		Ideas Asia Pacific - MIT	Cambridge, Massachusetts, USA, June 10, 2024	MIT Sloan Business School
		Ideas Asia Pacific - in person workshop - DEEP DIVE MODULE	Bali, August 7, 2024	UID Bali - MIT Sloan USA
		Risk Management Refreshment Level 7	Jakarta, September 4-5, 2024	Indonesia Risk Professional Association (IRPA)
Jasmin	Director of Distribution and Institutional Funding	Risk Management Refreshment Level 7	Jakarta, February 7, 2024	PT Garda Multi Talenta
		BTN Leadership Forum 2 - 2024	Bali, 2 – 4 Mei 2024	Mc Kinsey & PwC
		Risk Management Refreshment Level 7	Jakarta, May 15-16, 2024	Indonesia Risk Professional Association (IRPA)
		Strategic Decision - Making for Leaders	Cambridge, United Kingdom, October 7-9, 2024	Cambridge Judge Business School

Name	Position	Types of Training and Development Materials Competency / Training	Time and place Implementation	Organizer
Andi Nirwoto	Director of Information Technology	Risk Management Refreshment Level 7	Jakarta, February 7 2024	PT Garda Multi Talenta
		BTN Leadership Forum 2 - 2024	Bali, May 2-4, 2024	Mc Kinsey & PwC
Hirwandi Gafar	Director of Consumer	Risk Management Refreshment Level 7	Jakarta, January 12, 2024	PT Garda Multi Talenta
		BTN Leadership Forum 2 - 2024	Bali, 2 – 4 Mei 2024	Mc Kinsey & PwC
		Risk Management Refreshment Level 7	Jakarta, June 12-13, 2024	Indonesia Risk Professional Association (IRPA)
		ExeLeave taking ve Risk Management Program - Europe	Milan - La Spezia - Roma, Italy, 9 -18 November 2024	Lembaga Pengembangan Perbankan Indonesia (LPPI)
Hakim Putratama	Director of Operations and Customer Experience	Risk Management Refreshment Level 7	Jakarta, January 24 2024	PT Garda Multi Talenta
		BTN Leadership Forum 2 - 2024	Bali, 2 – 4 Mei 2024	Mc Kinsey & PwC
		Risk Management Refreshment Level 7	Jakarta, May 15-16, 2024	Indonesia Risk Professional Association (IRPA)
		Team Leadership	Rotterdam, Netherlands, 24 – 26 Juni 2024	RSM Erasmus Business School
Muhammad Iqbal*	Director of SME and Retail Funding Position President Director	ExeLeave Taking – Overview Briefing for BOD	Jakarta, April 18-19 2024	Lembaga Pengembangan Perbankan Indonesia (LPPI)
		BTN Leadership Forum 2 - 2024	Bali, 2 – 4 Mei 2024	Mc Kinsey & PwC
		Leading with Finance - Harvard Business School	Jakarta, May 15-26 2024	Harvard Business School
		Corporate Governance Program: Developing Exceptional Board Leaders	New York City, USA, September 10-13 2024	Columbia Business School

* Appointed through the 2024 Annual General Meeting of Shareholders (AGMS) on March 6, 2024, and successfully passed the fit and proper test on August 8, 2024.

Orientation Program for New Members of the Board of Directors

The Company has always held an Orientation Program or Introduction for newly-appointed members of the Board of Directors to be acquainted with one another and establish cooperation as a solid, comprehensive, effective team. The Orientation Program also aims to provide insight into the condition of the Company in general. The Board of Directors' orientation program includes:

1. Implementation of Good Corporate Governance and Code of Conduct principles in the Company.
2. Description regarding the duties and responsibilities of the Board of Commissioners and Board of Directors and other restrictions.
3. Overview of the Company in terms of the objectives, nature, and scope of the Company's activities, financial performance, and strategies, as well as the Company's short and long-term plans, risks, Internal Control, and other strategic issues.
4. Information regarding delegated authority, Internal and External Audits, Internal Control systems and policies, and the Audit Committees.

Throughout 2024, an orientation program has been conducted for the new member of the Board of Directors, Mr. Muhammad Iqbal, as the Director of SME and Retail Funding, with the following schedule and agenda.

No.	Agenda	Implementation Date
1.	Orientation on Board of Directors' Facilities	Thursday, March 21, 2024
2.	Orientation on Compliance, Good Corporate Governance (GCG), Board of Commissioners and Board of Directors' Working Relations, and Board of Commissioners' Code of Conduct	Thursday, March 21, 2024 Saturday, July 6, 2024
3.	Orientation on Internal Control System, Internal and External Audit	Wednesday, May 8, 2024
4.	Risk Management and Bank Soundness Level (TKB) Orientation	Saturday, July 6, 2024
5.	Digital Business Orientation	Sunday, July 7, 2024
6.	Orientasi Information TechnologyInformation Technology Orientation	Sunday, July 7, 2024
7.	Banking Products Orientation (Wealth Management, KUR, Retail Funds)	Sunday, July 7, 2024

Implementation of Directors' Duties

Throughout 2024, all members of the Board of Directors have carried out management duties and their accountability reports have been submitted to the Board of Commissioners in the form of:

1. Performance Review Report
2. Bank Health Level Report
3. Compliance Function Fulfillment Report
4. Corporate Governance Implementation Report
5. Audit Findings Follow-up Report

The Board of Directors has also implemented the principles of Corporate Governance in every business activity of the Company at all organizational levels during 2024, as follows:

1. Implement corporate governance criteria in accordance with POJK and BUMN Ministerial Regulations.
2. Implement corporate governance according to the ASEAN CG Scorecard criteria.
3. Socialization and implementation of the Code of Conduct.
4. Gratification report to the Corruption Eradication Commission.
5. Self Assessment of the Implementation of Corporate Governance in accordance with POJK.
6. Prepare and submit Annual Reports and Sustainability Reports.

Performance Assessment of Committees Under the Board of Directors, Corporate Secretary, Internal Audit Unit, Risk Management Unit, and Their Assessment Basis

The Company has established and set forth the structure and membership of the Committees to assist the duties of the Board of Directors. The supporting Committees have a role in monitoring, creating effectiveness in problem-solving, and developing strategic aspects proposed by the Company, in accordance with the prevailing legislation. These Committees consist of:

1. Risk Management Committee
2. Asset and Liability Management Committee (ALCO)
3. Credit Policy Committee
4. Credit Committee
5. Human Capital Committee

6. Information Technology Steering Committee
7. Transformation Committee
8. Business Committee
9. Environmental, Social, and Governance Committee (ESG)

An evaluation is conducted on committees under the Board of Directors to assess their performance in assisting the managerial duties of committees under the Board of Directors. The procedure for evaluating the performance of the supporting committees is carried out periodically by the Board of Directors. The performance of committees under the Board of Directors is evaluated based on the number of meetings held and the number of committee members present during the fiscal year. In 2024, the Board of Directors believes that its committees have fulfilled their duties and responsibilities appropriately.

In carrying out its duties, the Board of Directors is assisted by Committees under the Board of Directors and supporting units including the Corporate Secretary, Internal Audit Unit and Risk Management Unit. Performance appraisal for the Corporate Secretary, Internal Audit Unit and Risk Management Unit is assessed based on Key Performance Indicators (KPI), namely Main Targets, Collaborations, Initiatives and others. KPI achievement in 2024 for the Corporate Secretary, Internal Audit Unit and Risk Management Unit reached more than 100%. The Corporate Secretary, Internal Audit Unit and Risk Management Unit have carried out their duties properlY.

Mechanism for the Resignation and Dismissal of The Board of Directors

GMS may dismiss any member of the Board of Directors at any time if, for the reasons concerned, they do the following:

1. Unable/inadequate in fulfilling his/her obligations agreed upon in the management contract.
2. Unable to properly perform his/her responsibilities.
3. Violating the provisions of the Articles of Association and/or laws and regulations.
4. Involved in actions that harm the Company and/or the State.
5. Committing any actions that violate ethics and/or performing bad manners as members of the Board of Directors.
6. Declared guilty by a court decision with permanent legal force.
7. Resigned.
8. Other reasons deemed appropriate by the GMS for the interests and objectives of the Company.

In the event of consanguineous relation up to the third degree, both lineal and collateral, and an affinity (in-laws) relationship between any member of the Board of Directors and any member of the Board of Commissioners, GMS shall have the authority to dismiss one of them.

A member of the Board of Directors may resign from his/her position before his/her term of office ends. In the event that a member of the Board of Directors resigns, the resigning member must submit a written resignation request regarding his/her purpose to the company.

The Company must hold GMS to make a decision regarding the resignation request of such member of the Board of Directors at most 90 (ninety) days after receiving the resignation letter. The position of a Member of the Board of Directors shall be terminated if:

1. The resignation has been effective.
2. The said person passes away.
3. The term of office ends.
4. The said person is dismissed by GMS resolution.
5. The said person is declared bankrupt by a Commercial Court, which has permanent legal force, or is placed under receivership under a court decision.
6. The said person is no longer deemed qualified as a member of the Board of Directors under the provisions of the Articles of Association and laws and regulations, including as a holder of any restricted concurrent positions.

Members of the Board of Directors can be temporarily dismissed by the Board of Commissioners by stating the reasons if they act contrary to the Articles of Association, there are indications that they are taking actions that are detrimental to the Company, they are neglecting their obligations, or there are urgent reasons for the Company by considering the provisions stipulated by the Articles of Association. The decision to strengthen or revoke the temporary dismissal of a member of the Board of Directors by a member of the Board of Commissioners is stipulated in the GMS.

Board of Commissioners

The Board of Commissioners is a corporate body responsible for overseeing the company, both generally and specifically, in accordance with the Articles of Association, as well as providing advice to the Board of Directors in the best interests of the Company, Shareholders, and stakeholders.

Duties and Responsibilities of the Board of Commissioners

The duties and responsibilities of the Board of Commissioners as stipulated in the Board of Commissioners' Work Guidelines and Code of Conduct are as follows:

1. The Board of Commissioners is responsible for supervising the Company's policies and management of the Board of Directors, providing advice to the Board of Directors, and is responsible for such supervision, in accordance with the Company's goals and objectives as stipulated in the provisions of laws and regulations, the articles of association and GMS decisions.
2. The Board of Commissioners must carry out its duties, authority, and responsibilities in good manner, taking into account the interests of Shareholders, and with the principle of prudence.
3. In performing the supervisory duties, the Board of Commissioners must direct, monitor, and evaluate the implementation of integrated governance, risk management and compliance, as well as the Company's strategic policies, in accordance with the provisions of laws and regulations, the articles of association, and/or GMS decisions.
4. Assess the effectiveness and efficiency of the internal control system based on information obtained from the Internal Audit Unit at least once a year, as well as oversee and provide advice on the implementation of other internal audit functions in accordance with applicable laws and regulations, the Articles of Association, and/or resolutions of the General Meeting of Shareholders (GMS)/Minister.
5. The Board of Commissioners is responsible to supervise the Directors' follow-up on audit findings or examinations and recommendations from the Company's internal audit work unit, external auditors, Sharia Supervisory Board (DPS), results of supervision by the Financial Services Authority (OJK), and/or results of supervision by other authorities and institutions.
6. The Board of Commissioners is responsible for the development of the Company's Sharia Business Unit.
7. The Board of Commissioners carries out other obligations in the course of its supervisory and advisory duties, provided they do not conflict with applicable laws and regulations, the Articles of Association, and General Meeting of Shareholders (GMS) resolutions.
8. In performing the supervisory duties, the Board of Commissioners is prohibited from participating in decision making on the Company's operational activities, except:
   a. providing funds to related parties in accordance with the Financial Services Authority Regulations regarding the maximum limit for granting credit and providing large funds for public companies and the Financial OJK Regulation regarding the maximum limits for distributing funds and distributing large funds for sharia public companies; and
   b. other matters stipulated in the Company's articles of association or statutory provisions.
9. Decision making on the Company's operational activities by the Board of Commissioners as referred to in number 6 is part of the supervisory duties of the Board of Commissioners so that it does not negate the responsibility of the Board of Directors for the implementation of the Company's management.
10. The Board of Commissioners reviews affiliate transactions to ensure that they do not involve conflicts of interest, all material information has been disclosed, and the information is not misleading. Additionally, the Board reviews conflict-of-interest transactions by ensuring that all material information is disclosed and is not misleading.
11. The Board of Commissioners is responsible to report to the Financial Services Authority (OJK) no later than 5 (five) working days from the discovery of:
    a. violation of statutory provisions in the fields of finance, banking, and those related to the Company's business activities; and/or
    b. circumstances or predicted circumstances that could endanger the continuity of the Company's business.
12. The Board of Commissioners follows developments in the Company's activities and provides opinions, suggestions and/or explanations to the GMS, including but not limited to controlling shareholders, regarding any issues deemed important to the management of the Company.
13. Each member of the Board of Commissioners is jointly and severally liable for the Company's losses which are caused by errors or negligence from a fellow member of the Board of Commissioners in carrying out their duties unless he/ she is able to provide evidence as stated in the Articles of Association.

Duties and Responsibilities of The President Commissioner

Apart from the duties as a member of the Board of Commissioners, the President Commissioner who is the coordinator of the Board of Commissioners also has the following duties and responsibilities:

1. to lead meetings as regulated in the articles of association;
2. to facilitate constructive discussions;
3. to create a culture of work ethics including maintaining effective and healthy relationships with the Board of Directors; and

4. Provide suggestions to members of the Board of Commissioners regarding the implementation of the duties and obligations of the Board of Commissioners.

Authorities of the Board of Commissioners

The authority of the Board of Commissioners as regulated in the Board of Commissioners' Work Guidelines and Regulations is as follows:

1. The Board of Commissioners accepts and implements the authority delegated and/or granted to the Board of Commissioners in accordance with the provisions of statutory regulations, articles of association, and/or GMS decisions.
2. The Board of Commissioners has the authority to give approval to strategic plans, activities, reports and/or other documents prepared by the Board of Directors and require approval from the Board of Commissioners by considering the provisions in the articles of association, statutory regulations, and the determination of Series A Dwiwarna Shareholders.
3. The Board of Commissioners has the right to examine the Company's documents, inspect the Company's assets, check the condition of cash and securities, enter the grounds and buildings controlled and/or used by the Company, and find out about all policies and actions that have been, are being, and has been implemented by the Board of Directors.
4. The Board of Commissioners has the right to establish communication and request information and/or clarification from the Board of Directors and/or Executive Officers regarding any matters related to the management of the Company, including requesting the Board of Directors and/or Executive Officers to attend the Board of Commissioners' meetings with the knowledge of the Board of Directors.
5. The Board of Commissioners has the authority to propose to the GMS about the appointment of a Public Accounting Firm and/or Public Accountant who will provide audit services for annual historical financial information by taking into account recommendations from the Audit Committee.
6. The Board of Commissioners has the authority to nominate new candidates for members of the Board of Directors and candidates for members of the DPS to the Shareholders based on recommendations from the Remuneration and Nomination Committee to be decided at the GMS.
7. The Board of Commissioners has the authority to temporarily dismiss members of the Board of Directors in accordance with the provisions of the Articles of Association.
8. The Board of Commissioners has the authority to use experts for certain matters and within a certain period of time at the Company's expense if deemed necessary and taking into account applicable provisions.
9. The Board of Commissioners has the authority to take action to manage the Company in certain circumstances for a certain period of time in accordance with the provisions of the Company's Articles of Association.
10. The Board of Commissioners has the authority to attend Board of Directors meetings and provide opinions regarding the matters discussed.
11. The Board of Commissioners has the right to be entitled to an honorarium, allowances and/or facilities including tantiem and similar post-employment benefits and the amount is determined by the GMS with due observance of the applicable laws and regulations.
12. Carry out other supervisory authority as long as it does not conflict with the provisions of laws and regulations, the articles of association, and/or GMS decisions.

Decisions Requiring Approval of the Board of Commissioners

With due observance of the Articles of Association, laws and regulations, and provisions in the field of Capital Markets, the actions of the Board of Directors that require written approval from the Board of Commissioners:

1. In carrying out its duties, the Board of Commissioners is prohibited from participating in decision-making regarding the Company's operational activities, except in the following cases:
   a. The provision of funds to related parties as stipulated in the regulations concerning the legal lending limit for commercial banks; and
   b. Other matters stipulated in the Company's Articles of Association or applicable laws and regulations.
2. The decision-making on the Company's operational activities by the Board of Commissioners, as mentioned above, is part of the Board's supervisory duties and does not eliminate the Board of Directors' responsibility for the Company's management.
3. Taking into account the Company's Articles of Association, applicable laws and regulations, and provisions in the Capital Market sector, as well as the determination by the Series A Dwiwarna Shareholder regarding the limitations and criteria of actions by the Board of Directors that require approval from the Board of Commissioners and/or the Series A Dwiwarna Shareholder, the actions of the Board of Directors that require written approval from the Board of Commissioners consist of:
   a. Releasing/transferring and/or pledging Company assets with criteria and values exceeding a certain amount determined by the Board of Commissioners, except the Company's

assets in the context of implementing the Company's business activities in accordance with the provisions of laws and regulations, including assets in the form of credit, securities, collateral taken over, movable goods, and other assets obtained in the context of the Company's business activities, taking into account the provisions in the Capital Market and Banking sectors;

b. Writing off fixed assets due to certain conditions:
   (1) Lost;
   (2) Destroyed;
   (3) Damaged and cannot be transferred (total loss);
   (4) he transfer costs are greater than the economic value obtained from the transfer;
   (5) Dismantled to be rebuilt or built into another fixed asset, the budget for which has been determined through the ratification of the RKAP;
   (6) Dismantled not to be rebuilt in connection with another program that has been planned in the RKAP;
   (7) Dismantled to be rebuilt in connection with a government program; and/or
   (8) Based on the provisions of laws and/or court decisions that have permanent legal force, the fixed asset is no longer owned or controlled by the Company.
c. Carrying out cooperation with business entities or other parties, in the form of joint operations (KSO), business cooperation (KSU), licensing cooperation, Build, Operate and Transfer (BOT), Build, Transfer and Operate (BTO), Build, Operate and Own (BOO) and other agreements of the same nature whose term or value exceeds that determined by the Board of Commissioners;
d. Determine and change the Company's logo;
e. Determine the organizational structure 1 (one) level below the Board of Directors;
f. Making capital participation, releasing capital participation including changes in capital structure with a certain value determined by the Board of Commissioners in other companies, subsidiaries and joint ventures that are not in the context of rescuing receivables by taking into account the provisions in the Capital Market and Banking sectors;
g. Establish subsidiaries and/or joint ventures with a certain value determined by the Board of Commissioners by taking into account provisions in the Capital Markets and Banking sectors;
h. Propose representatives of the Company to become candidates for Members of the Board of Directors and Board of Commissioners in subsidiaries that provide significant contributions to the Company and/or have strategic value as determined by the Board of Commissioners;
i. Conduct mergers, amalgamations, takeovers, separations, and dissolutions of subsidiaries and joint ventures with a certain value determined by the Board of Commissioners by taking into account the provisions in the Capital Market and Banking sectors;
j. Carrying out actions included in material transactions as stipulated by the provisions of laws and regulations in the Capital Market sector with a certain value determined by the Board of Commissioners, unless such actions are included in material transactions that are excluded by the provisions of laws and regulations in the Capital Market sector;
k. Actions that have not been stipulated in the RKAP;

4. The determination of the limitations and/or criteria by the Board of Commissioners for the matters referred to in point 3 letters a, b, e, f, g, h, and i shall be made by the Board of Commissioners after obtaining approval from the Series A Dwiwarna Shareholders.
5. The approval of the Board of Commissioners specifically related to point 3 letters a, b, e, f, g, h, and i shall be granted by the Board of Commissioners after obtaining approval from the Series A Dwiwarna Shareholders.
6. The actions of the Board of Directors referred to in number 3 letters a and c, as long as they are necessary for the implementation of business activities that are commonly carried out in the banking business sector by taking into account the provisions of laws and regulations, do not require the approval of the Board of Commissioners and/or the GMS.
7. The actions of the Board of Directors as referred to in number 3 letter b number (2), number (3), and number (8) are carried out after obtaining the approval of the Series A Dwiwarna Shareholder.
8. In addition to the matters referred to in points 1 and 3, actions by the Board of Directors that require approval from the Board of Commissioners are as follows:
   a. The Company's Business Plan and Annual Work and Budget Plan, including any changes and additions, as well as other plans of the Company as regulated by the prevailing laws and regulations;
   b. The approval of the Recovery Action Plan (Recovery Plan);
   c. Internal policies of the Company as regulated by the laws and regulations;
   d. Other actions as regulated by laws and regulations and/or deemed by the Board of Commissioners to require approval from the Board of Commissioners.

9. The Board of Directors' request for approval from the Board of Commissioners must be submitted in writing and must comply with internal provisions and applicable laws and regulations. Upon receiving such a request, the Board of Commissioners shall provide a written decision within a maximum period of 30 (thirty) days from the receipt of the request letter from the Board of Directors or from the date the complete request is received.
10. In cases where the approval of the Board of Commissioners also requires approval from the Series A Dwiwarna Shareholders, the Board of Commissioners shall submit the request to the Series A Dwiwarna Shareholders after the complete request from the Board of Directors has been received by the Board of Commissioners. Subsequently, the Board of Commissioners shall provide a written decision to the Board of Directors after receiving the decision from the Series A Dwiwarna Shareholders.

Term of Office of the Board of Commissioners

Members of the Board of Commissioners are appointed for a term commencing from the appointment date determined by GMS and ending at the closing of the 5th (fifth) Annual GMS after the date of appointment, provided that the tenures do not exceed 5 (five) years, with due observance of applicable regulations and legislation in the Capital Market, and without neglecting the rights of GMS to dismiss any member of the Board of Commissioners at any time before their Term of Office is over.

After their term of office ends, members of the Board of Commissioners may be reappointed by GMS for one term of office.

Requirements for Members of the Board of Commissioners

The requirements for members of the Board of Commissioners stipulated in the Board of Commissioners' Work Guidelines and Code of Conduct are as follows:

1. Members of the Board of Commissioners are individuals who meet the requirements at the time of appointment and during his/her term of office in accordance with the Company's articles of association and statutory regulations.
2. Members of the Board of Commissioners must meet the fit and proper test requirements in accordance with the Financial Services Authority (OJK) Regulations concerning fit and proper test for financial services institutions.
3. Members of the Board of Commissioners who have met the approval requirements of the Financial Services Authority (OJK) while serving are required to have: a. Integrity; b. Competence; and c. Good reputation.
4. At least 1 (one) member of the Board of Commissioners must be domiciled in Indonesia.
5. Candidates for Independent Commissioners must have: a. knowledge in the banking sector that is adequate and relevant to the position as Independent Commissioner; and b. Experience in banking and/or finance.
6. Former members of the Board of Directors or Executive Officers or parties who have a relationship with the Company who may influence the person's ability to act independently must undergo a waiting period of at least 1 (one) year before becoming an Independent Commissioner.
7. Waiting period for:
   a. Former President Director of the Company; and
   b. Former member of the Board of Directors who supervises the supervisory function or Executive Officer who carries out the supervisory function at the Company, at least 6 (six) months before becoming an Independent Commissioner at the Company.
8. Independent Commissioners do not have financial relationships, management relationships, ownership relationships, affiliate relationships, and/or family relationships with other members of the Board of Commissioners, members of the Board of Directors, and/or controlling shareholders or relationships with the Company that could affect their ability to act independently.
9. Independent Commissioners do not have any direct or indirect business relationships related to the Company's business activities.
10. Independent Commissioners do not have any direct or indirect business relationships related to the Company's business activities.
11. Commissioners can be Independent Commissioners in the Company or the Company's business group by meeting the requirements as an Independent Commissioner.
12. Commissioners who will become Independent Commissioners in the Company are required to undergo a waiting period of at least 1 (one) year.
13. The transition from Commissioner to Independent Commissioner must obtain approval from the Financial Services Authority (OJK) through a fit and proper test in accordance with the Financial OJK Regulations regarding fit and proper test for financial services institutions.

Work Guidelines and Manual of the Board of Commissioners

The Board of Commissioners has established guidelines and work procedures as outlined in the Board of Commissioners' Decision No. 18/KOM/BTN/2024 dated December 18, 2024, regarding the Guidelines and Work Procedures for the Board of Commissioners of PT Bank Tabungan Negara (Persero) Tbk. The Board of Commissioners' Work Guidelines and Regulations are prepared based on corporate legal principles, provisions of the Articles of Association, statutory regulations and provisions, Shareholder directives, as well as Good Corporate Governance best practices.

The BOC's Board Manual shall ensure the Board of Commissioners performs its duties effectively and efficiently, and it shall also be used as a performance assessment tool for the Board of Commissioners. The Board Manual has stipulated various aspects, as follows:

Chapter I	General requirements	Article 1	Terms and Definitions
Chapter II	Membership	Article 2	Structure and Composition
		Article 3	Membership Criteria
		Article 4	Appointment
		Article 5	Term of Office
		Article 6	Dual Positions
		Article 7	Dismissal
Chapter III	Duties, Responsibilities and Authority	Article 8	Duties and Obligations
		Article 9	Authority
Chapter IV	Meeting	Article 10	Types of Meetings
		Article 11	Call and Organization of Meetings
		Article 12	Meeting Agenda
		Article 13	Chairing of Meetings
		Article 14	Decision-Making
		Article 15	Meeting Documentation
Chapter V	Working Mechanism	Article 16	Work Ethics
		Article 17	Prohibitions
		Article 18	Work Planning
		Article 19	Work Division
		Article 20	Working Hours
		Article 21	Performance Evaluation
		Article 22	Reporting and Accountability
		Article 23	Relationship between the Board of Commissioners and the Board of Directors
Chapter VI	Supporting Organs	Article 24	(Secretary of the Board)
		Article 25	Committees under the Board of Commissioners
Chapter VII	Sustainable Competency Development	Article 26	Competency Development
		Article 27	Training
		Article 28	Certification
Chapter VIII	Others	Article 29	Stakeholder Relations

Supervisory Duties of the Board of Commissioners

The distribution of the supervisory duties for the Board of Commissioners is listed as follows.

Table of Distribution of Duties of the Board of Commissioners

Name	Position	Field of Duty
Chandra M. Hamzah	President Commissioner/ Independent	Remuneration and Nomination
Iqbal Latanro	Vice President Commissioner / Independent	Audit (Internal & External), Remuneration, and Nomination
Armand B. Arief	Independent Commissioner	Risk Management and Compliance, Remuneration, and Nomination
Sentot A. Sentausa	Independent Commissioner	Audit (Internal & External), Remuneration, and Nomination
Adi Sulistyowati*	Independent Commissioner	Risk Management and Compliance, Remuneration, and Nomination
Bambang Widjanarko*	Independent Commissioner	Audit (Internal & External), Remuneration, and Nomination
Andin Hadiyanto	Commissioner	Risk Management, Remuneration, and Nomination
Herry Trisaputra Zuna	Commissioner	Risk Management and Compliance, Remuneration, and Nomination
Himawan Arief Sugoto	Commissioner	Risk Management and Compliance, Remuneration, and Nomination
Mohamad Yusuf Permana**	Commissioner	Remuneration and Nomination

* Appointed at the Annual General Meeting of Shareholders (RUPST) on March 6, 2024, and passed the capability and compliance assessments evaluation on October 7, 2024.
** Term of office ended on March 4, 2024, as confirmed at the Annual General Meeting of Shareholders (RUPST) on March 6, 2024

Policy on Concurrent Positions of the Board of Commissioners

1. Member of the Board of Commissioners is prohibited from holding concurrent positions:
   a. as a member of the board of directors, member of the board of commissioners, member of the Sharia Supervisory Board (DPS), or executive officer at a financial institution or financial company, both bank and non-bank;
   b. as a member of the board of directors, member of the board of commissioners, member of the Sharia Supervisory Board (DPS), or executive officer at more than one (1) non-financial institution or company, whether located domestically or abroad;
   c. in a functional role at a financial institution, both banking and non-banking, whether located domestically or abroad;
   d. officials of political parties and/or candidates/ members of the legislature, candidates for regional heads/deputy regional heads, and/or regional heads/deputy regional heads;
   e. in any other position that may cause a conflict of interest in carrying out duties as a member of the Board of Commissioners; and/or
   f. in any other position in accordance with the provisions of the laws and regulations.
2. This does not include holding multiple positions in the following cases:
   a. A member of the Board of Commissioners holds a position as a member of the board of directors, a member of the board of commissioners, or an executive officer performing supervisory functions at one (1) non-bank subsidiary company controlled by the Corporation;
   b. A commissioner performs functional duties on behalf of the shareholder of the Corporation in the form of a legal entity within the Corporation and/or its business group; and/or
   c. A member of the Board of Commissioners holds a position in a non-profit organization or institution, as long as it does not cause the individual to neglect their duties and responsibilities as a member of the Board of Commissioners.
3. With certain considerations, the Financial Services Authority may establish policies regarding dual positions as referred to in point 1 letter c above, provided that it does not result in the individual neglecting the performance of their duties and responsibilities as a member of the Board of Commissioners.
4. A candidate for a member of the Board of Commissioners who holds a position as referred to in point 2 must provide a statement to:
   a. Maintain integrity;
   b. Avoid any form of conflict of interest; and
   c. Avoid actions that could harm the Company and/ or cause the Company to violate the principles of prudence during their tenure as a member of the Board of Commissioners.
5. Independent Commissioners are prohibited from holding concurrent positions as public officials

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Table of Concurrent Positions of the Board of Commissioners

Name	Position	Positions in Other Companies/Institutions	Name of Other Company/ Institution
Chandra M. Hamzah	President Commissioner/ Independent	Partner	Assegaf Hamzah *and Partners Lawfirm*
Iqbal Latanro	Vice President Commissioner / Independent	-	-
Armand B. Arief	Independent Commissioner	Independent Commissioner	PT Cardig Aero Services Tbk
Sentot A. Sentausa	Independent Commissioner	-	-
Adi Sulistyowati*	Independent Commissioner	-	-
Bambang Widjanarko*	Independent Commissioner	-	-
Andin Hadiyanto	Commissioner	Head of Finance Education and Training Agency (FETA)	Ministry of Finance
		The Acting official President Director of Educational Fund Management Institution	Ministry of Finance
Himawan Arief Sugoto	Commissioner	Principal Advisor to the Minister of Ministry of Agrarian Affairs and Spatial Planning/National Land Agency	Ministry of Agrarian Affairs and Spatial Planning/ National Land Agency
Herry Trisaputra Zuna	Commissioner	Road and Bridge Management Expert Lead	Ministry of Public Works
Mohamad Yusuf Permana**	Commissioner	Head of the Protocol Bureau. ***	Ministry of State Secretariat

* Appointed at the Annual General Meeting of Shareholders (RUPST) on March 6, 2024, and passed the capability and compliance assessments on October 7, 2024
** Term of office ended on March 4, 2024, as confirmed at the Annual General Meeting of Shareholders (RUPST) on March 6, 2024
*** The data at the time of the termination of the term of office at the Annual General Meeting of Shareholders (RUPST) for the Fiscal Year 2023, held on March 6, 2024.

Management of Conflict of Interest of The Board of Commissioners

The Board of Commissioners is prohibited from being involved in making decisions related to banking operational activities, except for the provision of funds to related parties and other matters regulated in the Company's Articles of Association or applicable laws and regulations. The said involvement or approval of the Board of Commissioners does not negate the responsibility of the Board of Directors in implementing the management of the Company. The Board of Commissioners is also prohibited from being involved in making decisions that may cause a conflict of interest and/or against the laws and regulations and the Code of Conduct. Therefore, the Board of Commissioners must avoid conflicts of interest by always doing the following:

1. Prioritize the Company's interests and not diminish the Company's financial interest in the event of a conflict of interest;
2. Disclose his and/or his family's share ownership of 5% (five percent) or more in the Company or in other domestic and abroad companies;
3. Disclose family relationships, financial relationships, management relations, ownership relations with other members of the Board of Commissioners, members of the Board of Directors, controlling shareholders of the Company, and/or other parties within the Company's business;
4. Disclose the existence of concurrent positions;
5. Making disclosures in terms of decision making must be taken in conditions of a conflict of interest and the member of the Board of Commissioners concerned must not involve themselves in the Company's decision-making process relating to this matter;
6. Do not request, receive, permit, and/or agree to receive compensation, commission, additional money, services, money, valuables, and/or anything that has economic value or other benefits, for personal, family, and other parties' benefit, in carrying out the Company's business activities and other activities related to the Company.

Independent Commissioner

The composition of the Board of Commissioners of the Company as of December 31, 2024, consists of 9 (nine) members, with 6 (six) of them serving as Independent Commissioners, which represents 66.67% (sixty-six point six seven percent) of the total members of the Board of Commissioners. The composition of the members of the Board of Commissioners has complied with the provisions of the OJK Regulation number 17 of 2023 concerning the Implementation of Governance for Commercial Banks which stipulates that Independent Commissioners must be at least 50% (fifty percent) of the total members of the Board of Commissioners.

Criteria for Independent Commissioners

The criteria for Independent Commissioners' appointment refer to the OJK Regulation No. 33/POJK.04/2014 dated December 8, 2014, regarding the Board of Directors and Board of Commissioners of Issuers or Public Companies. The criteria for Independent Commissioners are as follows:

Independent Commissioner Criteria	Independent Commissioner					
	Chandra M. Hamzah	Iqbal Latanro	Armand B. Arief	Sentot A. Sentausa	Adi Sulistyowati	Bambang Widjanarko
Not a person who works or has the authority and responsibility to plan, lead, control, or supervise the activities of the Issuer or Public Company within the last 6 (six) months, except for reappointment as an Independent Commissioner of the Issuer or Public Company in the next period.	✓	✓	✓	✓	✓	✓
Not having shares directly or indirectly with the Issuer or Public Company.	✓	✓	✓	✓	✓	✓
Does not have an affiliate relationship with the Issuer or Public Company, members of the Board of Commissioners, members of the Board of Directors, or the majority shareholders of the Issuer or Public Company.	✓	✓	✓	✓	✓	✓
Does not have a business relationship, either directly or indirectly, related to the business activity of the Issuer or Public Company.	✓	✓	✓	✓	✓	✓

Statement of Independent Commissioners

The Company's Independent Commissioners have prepared and signed an Independent Statement and submitted it to the FSA, with respectively the following statements:

1. Has no financial, management, ownership, and/ or family relationship with the Bank, that may affect the ability to act independently as stipulated in the Financial Services Authority Regulation that regulates the Implementation of Governance for Commercial Banks;
2. In the event that on a later date, the Board of Commissioners has been found to have a relationship as referred to in number 1, the member of the Board of Commissioners is willing to surrender the position and is willing to be replaced.

In addition to the independence statement, members of the Board of Commissioners shall also report any changes to the status that may affect its independence as well as ensure that this practice has been implemented in accordance with the GCG principles. .

In detail, the independence statement letter is referred to as stated below.



SURAT PERNYATAAN INDEPENDEN
PT BANK TABUNGAN NEGARA (PERSERO) Tbk

Saya yang bertanda tangan di bawah ini :

Nama	:	Chandra M. Hamzah
Tempat/tanggal lahir	:	Jakarta, 29 Februari 1967
Alamat domisili (foto kpt KTP / SIM terlampir	:	
Nomor telepon rumah	:	
Jabatan	:	Komisaris Independen
Nama perusahaan	:	PT.Bank Tabungan Negara (Persero) Tbk
Nomor telepon perusahaan	:	(021) 633 6789

Dengan ini menyatakan bahwa saya:

1. Tidak memiliki hubungan keuangan, hubungan kepengurusan, hubungan kepemilikan, dan/atau hubungan keluarga dengan anggota Direksi, anggota Dewan Komisaris lain, dan/atau pemegang saham pengendali atau hubungan dengan Bank, yang dapat mempengaruhi kemampuan saya untuk bertindak independen sebagaimana diatur dalam ketentuan Otoritas Jasa Keuangan yang mengatur mengenai Penerapan Tata Kelola Bagi Bank Umum.
2. Apabila kemudian hari ditemukan bahwa saya memiliki hubungan sebagaimana dimaksud pada angka 1 maka saya bersedia melepaskan jabatan Komisaris Independen saya dan bersedia untuk diganti.

Demikian pernyataan independensi saya, yang telah saya buat dengan sebenar-benarnya.

Jakarta, 5 Februari 2020

Mengetahui :

Nixon L.P. Napitupilu
Direktur PT Bank Tabungan Negara (Persero) Tbk

Chandra M. Hamzah



BUMN

Bank BTN

SURAT PERNYATAAN INDEPENDEN
PT BANK TABUNGAN NEGARA (PERSERO) Tbk.

Saya yang bertandatangan di bawah ini:

Nama	:	Iqbal Latanro
Tempat dan Tanggal Lahir	:	Ujung Pandang, 5 Oktober 1958
Alamat domisili (fotokopi KTP/SIM terlampir)	:	
Nomor telepon rumah	:	
Jabatan	:	Calon Wakil Komisaris Utama Independen
Nama perusahaan	:	PT Bank Tabungan Negara (Persero) Tbk.
Nomor telepon perusahaan	:	(021) 633 6789

Dengan ini menyatakan bahwa saya:

1. Tidak memiliki hubungan keuangan, hubungan kepengurusan, hubungan kepemilikan, dan/atau hubungan keluarga dengan anggota Direksi, anggota Dewan Komisaris lain, dan/atau pemegang saham pengendali atau hubungan dengan Bank, yang dapat mempengaruhi kemampuan saya untuk bertindak independen sebagaimana diatur dalam ketentuan Otoritas Jasa Keuangan yang mengatur mengenai Penerapan Tata Kelola Bagi Bank Umum.
2. Apabila kemudian hari ditemukan bahwa saya memiliki hubungan sebagaimana dimaksud pada angka 1, maka saya bersedia melepaskan jabatan Komisaris Independen saya dan bersedia untuk diganti.

Demikian pernyataan independensi saya, yang telah saya buat dengan sebenar-benarnya.

Jakarta, 7 April 2021

Mengetahui:

Andi Nirwoto
Direktur Operation, IT and Digital Banking
PT Bank Tabungan Negara (Persero) Tbk

Iqbal Latanro



SURAT PERNYATAAN INDEPENDEN
PT BANK TABUNGAN NEGARA (PERSERO) Tbk

Saya yang bertanda tangan di bawah ini :

Nama	:	Armand Bachtiar Arief
Tempat/tanggal lahir	:	Tanjung Enim, 28 April 1952
Alamat domisili (foto kpt KTP / SIM terlampir	:	
Nomor telepon rumah	:	
Jabatan	:	Komisaris Independen
Nama perusahaan	:	PT.Bank Tabungan Negara (Persero) Tbk
Nomor telepon perusahaan	:	(021) 633 6789

Dengan ini menyatakan bahwa saya:

1. Tidak memiliki hubungan keuangan, hubungan kepengurusan, hubungan kepemilikan, dan/atau hubungan keluarga dengan anggota Direksi, anggota Dewan Komisaris lain, dan/atau pemegang saham pengendali atau hubungan dengan Bank, yang dapat mempengaruhi kemampuan saya untuk bertindak independen sebagaimana diatur dalam ketentuan Otoritas Jasa Keuangan yang mengatur mengenai Penerapan Tata Kelola Bagi Bank Umum.
2. Apabila kemudian hari ditemukan bahwa saya memiliki hubungan sebagaimana dimaksud pada angka 1 maka saya bersedia melepaskan jabatan Komisaris Independen saya dan bersedia untuk diganti.

Demikian pernyataan independensi saya, yang telah saya buat dengan sebenar-benarnya.

Jakarta, 30 Januari 2017

Mengetahui :

Nixon L.P. Napitupilu
Direktur PT Bank Tabungan Negara (Persero) Tbk

Armand Bachtiar Arief



BUMN

Bank BTN

SURAT PERNYATAAN

Saya yang bertanda tangan di bawah ini:

Nama	:	Santot A. Sentausa
Tempat dan Tanggal Lahir	:	Jakarta, 10 Juni 1967
Alamat domisili (fotokopi KTP/SIM terlampir)	:	
Nomor telepon rumah	:	
Jabatan	:	Komisaris Independen
Nama perusahaan	:	PT Bank Tabungan Negara (Persero) Tbk
Nomor telepon perusahaan	:	(021) 633 6789

Dengan ini menyatakan bahwa saya:

1. Tidak memiliki hubungan keuangan, hubungan kepengurusan, hubungan kepemilikan, dan/atau hubungan keluarga dengan anggota Direksi, anggota Dewan Komisaris lain, dan/atau pemegang saham pengendali atau hubungan dengan Bank, yang dapat mempengaruhi kemampuan saya untuk bertindak independen sebagaimana diatur dalam ketentuan Otoritas Jasa Keuangan yang mengatur mengenai Penerapan Tata Kelola Bagi Bank Umum.
2. Apabila kemudian hari ditemukan bahwa saya memiliki hubungan sebagaimana dimaksud pada angka 1 maka saya bersedia melepaskan jabatan Komisaris Independen saya dan bersedia untuk diganti.

Demikian pernyataan independensi saya yang telah saya buat dengan sebenar-benarnya.

Jakarta, 13 April 2022

Mengetahui :

CHANDRA M. HAMZAH
Komisaris Utama/Independen
PT Bank Tabungan Negara (Persero) Tbk

SENTOT A. SENTAUSA



SURAT PERNYATAAN

Saya yang bertanda tangan di bawah ini:

Nama	:	Adi Sulistyowati
Tempat dan Tanggal Lahir	:	Purbalingga, 11 Juni 1967
Alamat domisili (fotokopi KTP/SIM terlampir)	:	[redacted]
Nomor telepon rumah	:	[redacted]
Jabatan	:	Komisaris Independen
Nama perusahaan	:	PT Bank Tabungan Negara (Persero) Tbk
Nomor telepon perusahaan	:	(021) 633 6789

Dengan ini menyatakan bahwa saya:

1. Tidak memiliki hubungan keuangan, hubungan kepengurusan, hubungan kepemilikan, dan/atau hubungan keluarga dengan anggota Direksi, anggota Dewan Komisaris lain, dan/atau pemegang saham pengendali atau hubungan dengan Bank, yang dapat mempengaruhi kemampuan saya untuk bertindak independen sebagaimana diatur dalam ketentuan Otoritas Jasa Keuangan yang mengatur mengenai Penerapan Tata Kelola Bagi Bank Umum.
2. Apabila kemudian hari ditemukan bahwa saya memiliki hubungan sebagaimana dimaksud pada angka 1 maka saya bersedia melepaskan jabatan Komisaris Independen saya dan bersedia untuk diganti.

Demikian pernyataan independensi saya, yang telah saya buat dengan sebenar-benarnya.

Hormat saya,

CHANDRA M. HAMZAH
Komisaris Utama/Independen
PT Bank Tabungan Negara (Persero) Tbk

Jakarta, 31 Mei 2024

ADI SULISTYOWATI



SURAT PERNYATAAN

Saya yang bertanda tangan di bawah ini:

Nama	:	Bambang Widjanarko
Tempat dan Tanggal Lahir	:	Kediri, 28 Oktober 1963
Alamat domisili (fotokopi KTP/SIM terlampir)	:	[redacted]
Nomor telepon rumah	:	[redacted]
Jabatan	:	Komisaris Independen
Nama perusahaan	:	PT Bank Tabungan Negara (Persero) Tbk
Nomor telepon perusahaan	:	(021) 633 6789

Dengan ini menyatakan bahwa saya:

1. Tidak memiliki hubungan keuangan, hubungan kepengurusan, hubungan kepemilikan, dan/atau hubungan keluarga dengan anggota Direksi, anggota Dewan Komisaris lain, dan/atau pemegang saham pengendali atau hubungan dengan Bank, yang dapat mempengaruhi kemampuan saya untuk bertindak independen sebagaimana diatur dalam ketentuan Otoritas Jasa Keuangan yang mengatur mengenai Penerapan Tata Kelola Bagi Bank Umum.
2. Apabila kemudian hari ditemukan bahwa saya memiliki hubungan sebagaimana dimaksud pada angka 1 maka saya bersedia melepaskan jabatan Komisaris Independen saya dan bersedia untuk diganti.

Demikian pernyataan independensi saya, yang telah saya buat dengan sebenar-benarnya.

Hormat saya,

CHANDRA M. HAMZAH
Komisaris Utama/Independen
PT Bank Tabungan Negara (Persero) Tbk

Jakarta, 31 Mei 2024

BAMBANG WIDJANARKO

Meeting of the Board of Commissioners

Meeting Policy

1. The Board of Commissioners shall hold regular meeting at least 1 (once) a month, hereinafter referred to as the Board of Commissioner's Meeting.
2. The Board of Commissioners must hold regular meetings with the Board of Directors at least 1 (one) time in 4 (four) months, hereinafter referred to as the Board of Commissioners and Directors' Joint Meeting.
3. The Board of Commissioners is required to hold a meeting with the Sharia Supervisory Board (DPS) regularly at least once every 4 (four) months, hereinafter referred to as the meeting of the Board of Commissioners with the DPS.
4. The Board of Commissioners may hold a meeting at any time at the request of 1 (one) or several members of the Board of Commissioners or the Board of Directors, by specifying matters to be discussed.

MEETING SUMMONS AND COMMENCEMENT

1. The Board of Commissioners' Meeting and the Board of Commissioners and Directors' Join Meeting must be commenced if attended by majority members of the Board of Commissioners.
2. The commencement of the Board of Commissioner's meeting must be attended by all members of the Board of Commissioners physically at least 2 (twice) in 1 (one) year.
3. In the event that a member of the Board of Commissioners is unable to attend a meeting in person, the member may attend the meeting through teleconference, video conference, or other electronic media facilities in accordance with applicable regulations.
4. Summons for a meeting must be conducted by the President Commissioners, and in the event the President Commissioners is absent, which does not need to be proven to any party, the summons for a meeting is made by the Vice President Commissioner.
5. In the event the Vice President Commissioner is absent due to any reason, which does not need to be proven to any party, the summons for a meeting is made by a member of the Board of Commissioners.
6. Invitation for the Board of Commissioners' Meeting is made in writing or directly delivered to each member of the Board of Commissioner with a sufficient receipt, or by registered mail, or courier service or by telex, facsimile, or email no later than 5 (five) days before the meeting is held, excluding the date of summons and the date of the meeting, or sooner considering the urgency.
7. The invitation is not required for meetings that have been scheduled upon the decisions of the Board of Commissioner's meetings held previously.
8. Invitation to the meeting must include the agenda, date, time and venue of the meeting.
9. The meeting is commenced in the Company's domicile or other places in the territory of the Republic of Indonesia or the Company's business activities.
10. The meeting is valid and shall have right to take a binding resolution if attended and/or represented by more than ½ (one half) of the total members of the Board of Commissioners.
11. Each member of the Board of Commissioners must attend at least 75% (seventy-five percent) of each of the total number of Meetings of the Board of Commissioners, Meetings of the Board of Commissioners with the Board of Directors, and Meetings of the Board of Commissioners with DPS held in 1 (one) fiscal year.

MEETING MATERIALS

1. Meeting materials can be distributed to all meeting participants at least 5 (five) working days before the meeting is held.
2. In the event the meeting is held outside schedule due to urgent and important issue, meeting materials can be delivered before the meeting is commenced.

CHAIRMAN OF MEETING

1. The meeting is chaired by the President Commissioner.
2. In the event that the President Commissioner is absent or unable to attend, the Vice President Commissioner shall chair the Board of Commissioners Meeting or a member of the Board of Commissioners appointed by the deputy head Commissioner who presides over the Board of Commissioners Meeting if, at the same time, the Head Commissioner is absent or unavailable and does not make the appointment.
3. In the event the Vice President Commissioner is absent due to any reason, which does not need to be proven to any party, the summons for a meeting is made by a member of the Board of Commissioners, being present and nominated in the meeting.
4. In the event the President Commissioner does not make appointment, senior member of the Board of Commissioners serving as member of the Board of Commissioners acts as the chairman of the meeting.

5. In the event senior member of the Board of Commissioners serving as member of the Board of Commissioners is more than one, the oldest member of the Board of Commissioner acts as the chairman of the meeting.
6. If GMS does not appoint a Vice President Commissioner, in the event the President Commissioner is absent or unable to attend, the Board of Commissioner's Meeting is chaired by another member of the Board of Commissioner appointed by the President Commissioner.

DECISION MAKING

1. The Board of Commissioners is an assembly and each member of the Board of Commissioners cannot act independently, but rather based on the decision of the Board of Commissioners.
2. All decisions of the Board of Commissioners are taken at meetings.
3. Decision making at the Board of Commissioners' Meeting must firstly be made based on deliberation to reach consensus.
4. In the event that a decision based on deliberation to reach consensus is not reached, then the decision must be taken by voting based on affirmative votes of more than ½ (one-half) of the number of valid votes cast at the relevant meeting.
5. Each member of the Board of Commissioners has the right to cast 1 (one) vote and an additional 1 (one) vote for each other member of the Board of Commissioners, whom he or she legally represents at the meeting.
6. In the event that there is more than 1 (one) proposal, a reelection will be carried out so that 1 (one) proposal receives more than ½ (one-half) of the total votes cast.
7. A blank vote is deemed to approve the proposal submitted at the meeting.
8. Invalid votes are considered non-existent and are not counted in determining the number of votes cast at the meeting.
9. Voting regarding individuals is carried out using closed ballot papers without signatures, while voting regarding other matters is carried out verbally, unless the chairman of the meeting determines otherwise without any objection based on the majority of votes from those present.
10. If there are urgent and very important matters for the Company, the Board of Commissioners can also make valid decisions without holding a Board of Commissioners Meeting provided that all members of the Board of Commissioners have been notified in writing and all members of the Board of Commissioners have given their approval regarding the proposal submitted in writing and signing the agreement.
11. Decisions taken in this way have the same legal standing as decisions legally taken at a Board of Commissioners' Meeting.
12. All decisions of the Board of Commissioners are binding on all members of the Board of Commissioners.
13. Each member of the Board of Commissioners who personally in any way, either directly or indirectly, has an interest in a transaction, contract or proposed contract in which the Company is a party, must declare the nature of his/her interest at the Board of Commissioners' Meeting and has no right to participate in decision making regarding matters relating to the transaction or contract.

MEETING DOCUMENTATION

1. Documentation of the meeting must be included in the Minutes of Meeting.
2. The Board of Commissioners must prepare minutes of meetings as referred to in and document them in accordance with the provisions of regulations.
3. Minutes of the Board of Commissioners' Meeting must be prepared by someone present at the meeting appointed by the chairman of the meeting and then signed by all members of the Board of Commissioners present and submitted to all members of the Board of Commissioners.
4. Minutes of meetings of the Board of Commissioners and Directors' Joint Meeting must be drawn up by someone, being present at the meeting and appointed by the chairman of the meeting, signed by all members of the Board of Commissioners and the Board of Directors who are present, and submitted to all members of the Board of Commissioners and the Board of Directors.
5. The minutes of the Board of Commissioners' meeting with the Sharia Supervisory Board (DPS) must be prepared by a person present at the meeting, who is appointed by the meeting's chairperson. The minutes should then be signed by all members of the Board of Commissioners and DPS who were present and distributed to all members of the Board of Commissioners and DPS.
6. Dissenting opinion that may arise at the meeting must be stated clearly in the minutes of the meeting along with the reasons for the dissenting opinion.
7. In the event that there are members of the Board of Commissioners and/or members of the Board of Directors who do not sign the results of the meeting, the related person must state the reasons in writing in a separate letter attached to the minutes of the meeting.
8. Minutes of meetings must be documented by the Company.
9. Minutes of meetings are valid evidence for members of the Board of Commissioners and for third parties regarding the decisions taken at the said meeting.

Internal Meeting of the Board of Commissioners

BOARD OF COMMISSIONERS INTERNAL MEETING PLAN

Based on the 2024 Board of Commissioners Work Program, the Board of Commissioners' meeting plans had been held 36 (thirty-six) times in 1 (one) year or 3 (three) times in 1 (one) month from the minimum commencement requirements in the OJK Regulations as of 1 (one)) times in 2 (two) months. The Board of Commissioners' meetings are generally held on Wednesdays or as required.

The Board of Commissioners also holds joint meetings with the Board of Commissioners' Supporting Organ Committees which in the outline will discuss the following agenda:

- Current Issues.
- Review/study of reports/incoming letters and progress of follow-up advice/directions to the previous Board of Directors.
- Exposure of the Board of Commissioners' Supporting Organs Committee in the form of suggestions, opinions/recommendations to the Board of Commissioners regarding the review/studies that have been carried out to further serve as input for the Board of Commissioners in providing direction and advice to the Board of Directors as a form of active oversight by the Board of Commissioners.
- Exposure of the Audit Committee to the Findings of the Bank's Internal and/or External Audit Results and performance reviews of financial performance.

REALIZATION OF INTERNAL MEETING OF THE BOARD OF COMMISSIONERS

Throughout 2024, the Board of Commissioners has held 53 (fifty three) internal meetings. In detail, it is presented in the table as follows:

Table of Board of Commissioners Internal Meetings

No.	Meeting Date	Agenda	Chandra M. Hamzah	Iqbal Latanro	Armand B. Arief	Sentot A. Sentausa	Adi Sulistyowati	Bambang Widjanarko	Andin Hadiyanto	Herry Trisaputra Zuna	Himawan Arief Sugoto	Mohamad Yusuf Permana
1.	January 10, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present			Present	Present	Present	Present
2.	January 17, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present			Present	Present	Present	Present
3.	January 24, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present			Present	Present	Present	Present
4.	January 31, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present			Present	Present	Present	Present
5.	February 01, 2024	Closing Meeting Audit of Financial Statements December 31, 2023	Present	Present	Present	Present			Present	Present	Present	Present

No.	Meeting Date	Agenda	Chandra M. Hamzah	Iqbal Latanro	Armand B. Arief	Sentot A. Sentausa	Adi Sulistyowati	Bambang Widjanarko	Andin Hadiyanto	Herry Trisaputra Zuna	Himawan Arief Sugoto	Mohamad Yusuf Permana
6.	February 07, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present			Present	Present	Present	Present
7.	February 13, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present			Present	Present	Present	Present
8.	February 21, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present			hadir	hadir	hadir	Present
9.	February 28, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present			Present	Present	Present	Present
10.	March 06, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present			Present	Present	Present	
11.	March 06, 2024	Composition of the Board of Commissioners Committee Members in connection with the results of the Annual GMS for Financial Year 2023	Present	Present	Present	Present	not present as an observer	not present as an observer	Present	Not Present	Not Present	
12.	March 13, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present as an observer	Present as an observer	Present	Present	Present	
13.	March 20, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present as an observer	not present as an observer	Present	Present	Present	
14.	March 27, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present as an observer	not present as an observer	Present	Present	Present	
15.	April 03, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present as an observer	not present as an observer	Present	Present	Present	

No.	Meeting Date	Agenda	Chandra M. Hamzah	Iqbal Latanro	Armand B. Arief	Sentot A. Sentausa	Adi Sulistyowati	Bambang Widjanarko	Andin Hadiyanto	Herry Trisaputra Zuna	Himawan Arief Sugoto	Mohamad Yusuf Permana
16.	April 24, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Not present as an observer	Present as an observer	Present	Present	Present	
17.	April 30, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present as an observer	Present as an observer	Present	Present	Present	
18.	May 08, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present as an observer	Present as an observer	Present	Present	Present	
19.	May 15, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present as an observer	Present as an observer	Present	Present	Present	
20.	May 22, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present as an observer	Present as an observer	Present	Present	Present	
21.	May 29, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present as an observer	Present as an observer	Present	Present	Present	
22.	June 05, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Not present as an observer	Present as an observer	Present	Present	Present	
23.	June 12, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Not present as an observer	Present as an observer	Present	Present	Present	
24.	June 19, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Not present	Not present	Present	Present	Present as an observer	Present as an observer	Present	Present	Present	
25.	June 26, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Not Present	Present as an observer	Present as an observer	Present	Present	Present	

No.	Meeting Date	Agenda	Chandra M. Hamzah	Iqbal Latanro	Armand B. Arief	Sentot A. Sentausa	Adi Sulistyowati	Bambang Widjanarko	Andin Hadiyanto	Herry Trisaputra Zuna	Himawan Arief Sugoto	Mohamad Yusuf Permana
26.	July 03, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Not present as an observer	Present as an observer	Present	Present	Present	
27.	July 10 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present as an observer	Present as an observer	Present	Present	Present	
28.	July 12, 2024	Discussion of Vision - Mission Alignment in BTN's RJPP 2025-2029	Present	Present	Present	Present	Present as an observer	Present as an observer	Present	Present	Present	
29.	July 17, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present as an observer	Present as an observer	Present	Present	Present	
30.	July 24, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present as an observer	Present as an observer	Present	Present	Present	
31.	July 31, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present as an observer	Present as an observer	Present	Present	Present	
32.	August 07, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present as an observer	Present as an observer	Present	Present	Present	
33.	August 14, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present as an observer	Present as an observer	Present	Present	Present	
34.	August 21, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present as an observer	Present as an observer	Present	Present	Present	
35.	August 28, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present as an observer	Present as an observer	Present	Present	Present	

No.	Meeting Date	Agenda	Chandra M. Hamzah	Iqbal Latanro	Armand B. Arief	Sentot A. Sentausa	Adi Sulistyowati	Bambang Widjanarko	Andin Hadiyanto	Herry Trisaputra Zuna	Himawan Arief Sugoto	Mohamad Yusuf Permana
36.	September 04, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present as an observer	Present as an observer	Present	Present	Present	
37.	September 11, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present as an observer	Present as an observer	Present	Present	Present	
38.	September 18, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present as an observer	Present as an observer	Present	Present	Present	
39.	September 25, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present as an observer	Present as an observer	Present	Present	Present	
40.	October 02, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present as an observer	Present as an observer	Present	Present	Present	
41.	October 07, 2024	Cloud System Environment Audit Results and Information Technology Strategic Plan Initiatives	Present	Present	Present	Present	Present	Present	Present	Present	hadir	
42.	October 09, 2024	• Surat Masuk • Evaluasi Hasil Rapat • Informasi Terkini • Informasi Lain	Not present	Present	Present	Present	Present	Present	Present	Present	hadir	
43.	October 16, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present	Present	Present	Present	hadir	
44.	October 23, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present	Present	Present	Present	hadir	
45.	October 30, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present	Present	Present	Present	hadir	

No.	Meeting Date	Agenda	Chandra M. Hamzah	Iqbal Latanro	Armand B. Arief	Sentot A. Sentausa	Adi Sulistyowati	Bambang Widjanarko	Andin Hadiyanto	Herry Trisaputra Zuna	Himawan Arief Sugoto	Mohamad Yusuf Permana
46.	November 06, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Not present	Present	Not present	Present	Present	Present	Present	Not present	Present	
47.	November 13, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present	Present	Present	Present	Present	
48.	November 20, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Not present	Present	Present	Present	Present	Present	Present	Present	Present	
49.	November 28, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present	Present	Present	Present	Present	
50.	November 29, 2024	Discussion of the Tantiem Budget of the Board of Directors and Board of Commissioners of PT Bank Tabungan Negara (Persero) Tbk in the Company's Work Plan and Budget (RKAP) Year 2025	Present	Present	Present	Present	Present	Present	Present	Present	Present	
51.	December 04, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present	Present	Present	Present	Present	
52.	December 11, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Not present	Present	Present	Present	Present	Present	Present	Present	
53.	December 18, 2024	• Incoming Mail • Evaluation of Meeting Results • Latest Information • Other Information	Present	Present	Present	Present	Present	Present	Present	Present	Present	

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

JOINT MEETING PLAN OF THE BOARD OF COMMISSIONERS AND THE BOARD OF DIRECTORSI

Based on the decision made in the Board of Commissioners Meeting, it is decided that a joint meeting with the Board Of Commissioners is held in the period of at least 1 (once) every 4 (four) months. The topics discussed include:lah:

1. Compilation of Bank Business Plan (RBB) and Company Work Plan and Budget (RKAP).
2. Evaluation of the Company's performance achievements
3. Implementation of Anti-Money Laundering, Countering the Financing of Terrorism, and Countering the Financing of Weapons of Mass Destruction programs
4. Implementation of Good Corporate Governance
5. Follow-up on findings from both internal and external audits.

In 2024, it was agreed that joint meetings would be scheduled on Wednesdays of the third week of each month. The Board of Commissioners' meeting with the Board of Directors is held in odd months and initiated by the Board of Commissioners, while the Board of Directors' meeting with the Board of Commissioners is held in even months and initiated by the Board of Directors. Both the joint meetings of the Board of Commissioners and the Board of Directors are conducted in accordance with the Company's Articles of Association..

REALIZATION OF BOARD OF COMMISSIONERS AND BOARD OF DIRECTORS MEETINGS

In 2024, the Board of Commissioners conducted 8 (eight) joint meetings with the Board of Directors initiated by the Board of Commissioners. Detailed information regarding the joint meeting attendees is presented below.

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

No.	Meeting Date	Agenda	Board of Commissioners		Board of Directors	
			Participant	Attendance	Participant	Attendance
1.	January 24, 2024	1. Bankwide Performance Review as of December 2023 2. UUS Performance Review as of December 2023 3. Monitoring of Risk Appetite, Risk Tolerance, and Recovery Plan for Bankwide and UUS as of December 2023 4. Progress on the Implementation of Corporate Plan Initiatives, Including Profitability Aspects, as of December 2023 5. Evaluation and Monitoring of New Bank Products (PBB) and Activities for the Bank's Interests (KuKB), Including Profitability Aspects, as of December 2023 6. Progress on the Completion of Credit Documents and Customer Information File (CIF) Data Improvement as of December 2023 7. Report on the Implementation of Anti-Money Laundering (AML), Counter-Terrorism Financing (CFT), and Prevention of the Financing of the Proliferation of Weapons of Mass Destruction (PFWMD) for the Second Semester of 2023 8. Draft of the Joint Agreement Letter between the Board of Commissioners and the Board of Directors on the Guidelines for the Working Relationship between the Board of Commissioners and the Board of Directors 9. Plan for the Utilization of Menara II BTN Building.	1. Chandra M. Hamzah 2. Iqbal Latanro 3. Armand B. Arief 4. Sentot A. Sentausa 5. Andin Hadiyanto 6. Herry Trisaputra Zuna 7. Himawan Arief Sugoto 8. Mohamad Yusuf Permana	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present	1. Nixon L.P. Napitupulu 2. Oni Febriarto Rahardjo 3. Andi Nirwoto 4. Elisabeth Novie Riswanti 5. Hirwandi Gafar 6. Jasmin 7. Setiyo Wibowo 8. Nofry Rony Poetra 9. Eko Waluyo 10. Hakim Putratama	1. Present 2. Present 3. Not Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present

No.	Meeting Date	Agenda	Board of Commissioners		Board of Directors	
			Participant	Attendance	Participant	Attendance
2.	20 Maret 2024	1. Bankwide Performance Review as of February 2024 2. UUS Performance Review as of February 2024 3. Monitoring of Risk Appetite, Risk Tolerance, and Recovery Plan for Bankwide and UUS as of February 2024 4. Progress on Customer Data Improvement or Customer Identification File (CIF) as of February 2024 5. Monitoring the Completion of Key Credit Documents for Out-of-Tolerance (LAT) Category as of February 2024 6. Discussion on the Proposed Changes to the Head Office Organizational Structure 7. Progress Update on Project Camel 8. Discussion on the Management Letter for the Financial Statements as of December 31, 2023 9. Progress on the Implementation of Corporate Plan Initiatives, Including Profitability Aspects, as of February 2024	1. Chandra M. Hamzah 2. Iqbal Latanro 3. Armand B. Arief 4. Sentot A. Sentausa 5. Adi Sulistyowati 6. Bambang Widjanarko 7. Andin Hadiyanto 8. Herry Trisaputra Zuna 9. Himawan Arief Sugoto	1. Present 2. Present 3. Present 4. Present 5. Present as an observer 6. Not present as an observer 7. Present 8. Present 9. Present	1. Nixon L.P. Napitupulu 2. Oni Febriarto Rahardjo 3. Andi Nirwoto 4. Elisabeth Novie Riswanti 5. Hirwandi Gafar 6. Jasmin 7. Setiyo Wibowo 8. Nofry Rony Poetra 9. Eko Waluyo 10. Hakim Putratama 11. Muhammad Iqbal	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present as an observer
3.	May 22, 2024	1. Bankwide Performance Review as of April 2024 2. UUS Performance Review as of April 2024 3. Monitoring of Risk Appetite, Risk Tolerance, and Recovery Plan for Bankwide and UUS as of April 2024 4. Progress on the Implementation of Corporate Plan Initiatives, Including Profitability Aspects, as of April 2024 5. Progress on Customer Data Improvement or Customer Identification File (CIF) as of March 2024 6. Progress on the Formulation of BTN's Vision & Mission for 2025-2029 7. Progress Update on Project Camel 8. Progress Update on the Preparation of the White Paper 9. Update on Media Protocol & Stakeholder Handling in the Event of Fraud 10. Update on the New Subsidized Mortgage (KPR) Scheme and Government Guarantee for Housing Financing	1. Chandra M. Hamzah 2. Iqbal Latanro 3. Armand B. Arief 4. Sentot A. Sentausa 5. Adi Sulistyowati 6. Bambang Widjanarko 7. Andin Hadiyanto 8. Herry Trisaputra Zuna 9. Himawan Arief Sugoto	1. Present 2. Present 3. Present 4. Present 5. Present as an observer 6. present as an observer 7. Present 8. Present 9. Present	1. Nixon L.P. Napitupulu 2. Oni Febriarto Rahardjo 3. Andi Nirwoto 4. Elisabeth Novie Riswanti 5. Hirwandi Gafar 6. Jasmin 7. Setiyo Wibowo 8. Nofry Rony Poetra 9. Eko Waluyo 10. Hakim Putratama 11. Muhammad Iqbal	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Absent 10. Present 11. Present as an observer
4.	July 12, 2024	Alignment of Vision and Mission in the Long-Term Corporate Plan (RJPP) 2025–2029 of PT Bank Tabungan Negara (Persero) Tbk	1. Chandra M. Hamzah 2. Iqbal Latanro 3. Armand B. Arief 4. Sentot A. Sentausa 5. Adi Sulistyowati 6. Bambang Widjanarko 7. Andin Hadiyanto 8. Herry Trisaputra Zuna 9. Himawan Arief Sugoto	1. Present 2. Present 3. Present 4. Present 5. Present as an observer 6. present as an observer 7. Present 8. Present 9. Present	1. Nixon L.P. Napitupulu 2. Oni Febriarto Rahardjo 3. Andi Nirwoto 4. Elisabeth Novie Riswanti 5. Hirwandi Gafar 6. Jasmin 7. Setiyo Wibowo 8. Nofry Rony Poetra 9. Eko Waluyo 10. Hakim Putratama 11. Muhammad Iqbal	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present as an observer

No.	Meeting Date	Agenda	Board of Commissioners		Board of Directors	
			Participant	Attendance	Participant	Attendance
5.	July 24, 2024	1. Bankwide Performance Review and KPI Achievement as of June 2024 2. UUS Performance Review as of June 2024 3. Monitoring of Risk Appetite, Risk Tolerance, and Recovery Plan for Bankwide and UUS as of June 2024 4. Progress on the Implementation of Corporate Plan Initiatives, Including Profitability Aspects, as of June 2024 5. Report on the Implementation of the AML, CFT, and PFWMD Program for the First Semester of 2024 6. Evaluation and Monitoring of New Bank Products (PBB) and Activities for the Bank's Interests (KuKB), Including Profitability Aspects, as of June 2024 7. Progress on Customer Data Improvement or Customer Identification File (CIF) as of June 2024 8. Monitoring the Completion of Credit Documents for Out-of-Tolerance (LAT), Sale and Purchase Binding Agreement (PPJB), and Deed of Assignment of Mortgage Rights (SKMHT) Categories as of June 2024 9. Progress Update on Project Camel 2.0 and Preparation for the Spin-off of UUS	1. Chandra M. Hamzah 2. Iqbal Latanro 3. Armand B. Arief 4. Sentot A. Sentausa 5. Adi Sulistyowati 6. Bambang Widjanarko 7. Andin Hadiyanto 8. Herry Trisaputra Zuna 9. Himawan Arief Sugoto	1. Present 2. Present 3. Present 4. Present 5. Present as an observer 6. present as an observer 7. Present 8. Present 9. Present	1. Nixon L.P. Napitupulu 2. Oni Febriarto Rahardjo 3. Andi Nirwoto 4. Elisabeth Novie Riswanti 5. Hirwandi Gafar 6. Jasmin 7. Setiyo Wibowo 8. Nofry Rony Poetra 9. Eko Waluyo 10. Hakim Putratama 11. Muhammad Iqbal	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present as an observer
6.	September 18, 2024	1. Bankwide Performance Review as of August 2024 2. UUS Performance Review as of August 2024 3. Monitoring of Risk Appetite, Risk Tolerance, and Recovery Plan for Bankwide and UUS as of August 2024 4. Progress on the Implementation of Corporate Plan Initiatives, Including Profitability Aspects, as of August 2024 5. Progress on Customer Data Improvement or Customer Identification File (CIF) as of August 2024 6. Progress Update on Project Hijra and Preparation for the Spin-off of UUS 7. Discussion on the Long-Term Corporate Plan (Corporate Plan) for the 2025–2029 Period	1. Chandra M. Hamzah 2. Iqbal Latanro 3. Armand B. Arief 4. Sentot A. Sentausa 5. Adi Sulistyowati 6. Bambang Widjanarko 7. Andin Hadiyanto 8. Herry Trisaputra Zuna 9. Himawan Arief Sugoto	1. Not Present 2. Present 3. Present 4. Present 5. Present as an observer 6. present as an observer 7. Present 8. Present 9. Present	1. Nixon L.P. Napitupulu 2. Oni Febriarto Rahardjo 3. Andi Nirwoto 4. Elisabeth Novie Riswanti 5. Hirwandi Gafar 6. Jasmin 7. Setiyo Wibowo 8. Nofry Rony Poetra 9. Eko Waluyo 10. Hakim Putratama 11. Muhammad Iqbal	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present
7.	November 20, 2024	1. Preparation of the Corporate Work Plan and Budget (RKAP) for 2025 2. Bankwide Performance Review as of October 2024 3. Performance Review UUS s.d. Oktober 2024. 4. Monitoring of Risk Appetite, Risk Tolerance, and Recovery Plan for Bankwide and UUS as of October 2024 5. Progress on the Implementation of Corporate Plan Initiatives, Including Profitability Aspects, as of October 2024 6. Monitoring the Implementation of Improvement Recommendations from the Diagnostic Review of Internal Control over Financial Reporting (ICOFR) 7. Progress Update on Project Hijra and Preparation for the Spin-off of the Sharia Business Unit (UUS) 8. Strategy and Readiness to Support the 3 Million Housing Program	1. Chandra M. Hamzah 2. Iqbal Latanro 3. Armand B. Arief 4. Sentot A. Sentausa 5. Adi Sulistyowati 6. Bambang Widjanarko 7. Andin Hadiyanto 8. Herry Trisaputra Zuna 9. Himawan Arief Sugoto	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present	1. Nixon L.P. Napitupulu 2. Oni Febriarto Rahardjo 3. Andi Nirwoto 4. Elisabeth Novie Riswanti 5. Hirwandi Gafar 6. Jasmin 7. Setiyo Wibowo 8. Nofry Rony Poetra 9. Eko Waluyo 10. Hakim Putratama 11. Muhammad Iqbal	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present

No.	Meeting Date	Agenda	Board of Commissioners		Board of Directors	
			Participant	Attendance	Participant	Attendance
8.	November 27, 2024	Preparation of the Corporate Work Plan and Budget (RKAP) for 2025 and the Bank Business Plan (RBB) for 2025–2027.	1. Chandra M. Hamzah 2. Iqbal Latanro 3. Armand B. Arief 4. Sentot A. Sentausa 5. Adi Sulistyowati 6. Bambang Widjanarko 7. Andin Hadiyanto 8. Herry Trisaputra Zuna 9. Himawan Arief Sugoto	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present	1. Nixon L.P. Napitupulu 2. Oni Febriarto Rahardjo 3. Andi Nirwoto 4. Elisabeth Novie Riswanti 5. Hirwandi Gafar 6. Jasmin 7. Setiyo Wibowo 8. Nofry Rony Poetra 9. Eko Waluyo 10. Hakim Putratama 11. Muhammad Iqbal	1. Not Present 2. Present 3. Present 4. Present 5. Not Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present

The realization of the Board of Directors meeting with the Board of Commissioners is presented in the Board of Directors Meeting with the Board of Commissioners section..

Table of Meeting Frequency and Attendance Level of the Board of Commissioners

Name	Position	Internal Meeting of the Board of Commissioners			Joint Meeting of the Board of Commissioners and the Board of Directors			GMS		
		Number and Percentage of Attendance			Number and Percentage of Attendance			Number and Percentage of Attendance		
		Number of Meetings	Number of Attendance	Percentage	Number of Meetings	Number of Attendance	Percentage	Number of Meetings	Number of Attendance	Percentage
Chandra M. Hamzah	President Commissioner/ Independent	53	49	92.45%	8	7	87.50%	1	1	100%
Iqbal Latanro	Vice President Commissioner/ Independent	53	51	96.23%	8	8	100%	1	1	100%
Armand B. Arief	Independent Commissioner	53	52	98.11%	8	8	100%	1	1	100%
Sentot A. Sentausa	Independent Commissioner	53	52	98.11%	8	8	100%	1	1	100%
Adi Sulistyowati*	Independent Commissioner	13	13	100%	2	2	100%	0	0	-
Bambang Widjanarko*	Independent Commissioner	13	13	100%	2	2	100%	0	0	-
Andin Hadiyanto	Commissioner	53	53	100%	8	8	100%	1	1	100%
Himawan Arief Sugoto	Commissioner	53	51	96.23%	8	8	100%	1	1	100%
Herry Trisaputra Zuna	Commissioner	53	52	98.11%	8	8	100%	1	1	100%
Mohamad Yusuf Permana**	Commissioner	9	9	100%	1	1	100%	0	0	-

* Appointed at the Annual General Meeting of Shareholders (AGMS) on March 6, 204, and passed the fit and proper test on October 7, 2024
** Term of office ended on March 4, 2024, as confirmed at the AGMS on March 6, 2024

Competency Development of Board of Commissioners

Competency Development Policy

Policies related to competency development including the Board of Commissioners orientation program is governed by the Guidelines and Code of Conduct for the Board of Commissioners. The competency development policy for members of the Board of Commissioners includes:

1. Members of the Board of Commissioners are required to participate in continuous competency development programs, either domestically or internationally, with the aim of enhancing their skills and knowledge to support the execution of their duties, obligations, and responsibilities.
2. The plan for continuous competency development for members of the Board of Commissioners is outlined in the Board of Commissioners' annual work program.
3. If continuous education is conducted outside of the pre-determined work program, the competency development must be decided in a Board of Commissioners Meeting.
4. Members of the Board of Commissioners who have participated in continuous competency development must submit a written report on the results to the Board of Commissioners or present it during a Board of Commissioners Meeting.
5. New members of the Board of Commissioners are required to attend an orientation program to familiarize themselves with the Company;
6. Other matters concerning facilities for the implementation of continuous education refer to the Company's regulation.

Competency Development Realization

Throughout 204, members of the Company's Board of Commissioners participated in various competency enhancement programs, including training, workshops, conferences, and seminars, as detailed in the following table.

Name	Position	Type of Training and Competency/Training	Time and place Implementation	Organizer
Chandra M. Hamzah	President Commissioner/ Independent	Executive Risk Management Program - Level 6	January 27, 2024 in Bogor	LPPI
		BTN Leadership Forum 2 - 2024	May 2, 2024, to May 4, 2024 in Bali	McKinsey & PwC
		Risk Management Certification Level 6	March 4, 2024, in Jakarta	LSPP
		Alignment of Risk Management Certification for the Board of Commissioners Level 6	June 27, 2024, to 28 June 28, 2024 in Yogyakarta	IRPA & OJK
		Boardroom Bound: Accelerating Growth to Embrace The Future BTN	October 25, 2024 in Batam	LPPI
		Innovation and Entrepreneurship: Cutting-edge Insights from China	November 4, 2024, to November 8, 2024, in Tiongkok	AGLP
Iqbal Latanro	Wakil Komisaris Utama/ Independen	Executive Risk Management Program - Level 7	Januari 27, 2024 in Bogor	LPPI
		BTN Leadership Forum 2 - 2024	May 2, 2024 to. 04 May 4, 2024 in Bali	McKinsey & PwC
		Alignment of Risk Management Certification for the Board of Commissioners Level 7	June 11, 2024, to 13 June 13, 2024, in Bali	IRPA & OJK
		Risk Management Certification for the Board of Commissioners Level 7	April 1, 2024, in Jakarta	LSPP
		Boardroom Bound: Accelerating Growth to Embrace The Future BTN	Oktober 25, 2024 in Batam	LPPI

Name	Position	Type of Training and Competency/Training	Time and place Implementation	Organizer
Armand B. Arief	Independent Commissioner	Executive Risk Management Program - Level 6	Januari 27, 2024 in Bogor	LPPI
		Executive Risk Management Refresher: ES	February 23, 2024, to March 3, 2024, in Europe (Vienna, Budapest, Praha)	LPPI
		Risk Management Certification Level 6	March 19, 2024, in Jakarta	LSPP
		BTN Leadership Forum 2 - 2024	May 2, 2024, to May 4, 2024, in Bali	McKinsey & PwC
		Alignment of Risk Management Certification for the Board of Commissioners Level 6	June 27, 2024 to 28 June 28, 2024 in Yogyakarta	IRPA & OJK
		Boardroom Bound: Accelerating Growth to Embrace The Future BTN	October 25, 2024 in Batam	LPPI
		Innovation and Entrepreneurship: Cutting-edge Insights from China	November 4, 2024 to November 8, 2024, in Tiongkok	AGLP
Sentot A. Sentausa	Independent Commissioner	Executive Risk Management Program - Level 7	Januari 27, 2024 in Bogor	LPPI
		Executive Risk Management Refresher: ES	February 23, 2024, to March 3, 2024, in Europe (Vienna, Budapest, Praha)	LPPI
		Risk Management Certification Level 7	Maret 19, 2024 in Jakarta	LSPP
		BTN Leadership Forum 2 - 2024	May 2, 2024, to May 4, 2024 in Bali	McKinsey & PwC
		Alignment of SMR Level 7	May 21, 2024, to May 22, 2024 in Jakarta	BARA & OJK
		Boardroom Bound: Accelerating Growth to Embrace The Future BTN	October 25, 2024 in Batam	LPPI
Adi Sulistyowati*	Independent Commissioner	Preparation for Risk Management Certification Level 7	May 14, 2024, in Jakarta	PT Garda Multi Talenta
		Risk Management Certification for the Board of Commissioners Level 7	June 7, 2024 in Jakarta	LSPP
		Alignment of Risk Management Certification for the Board of Commissioners Level 7	June 11, 2024, to 13 June 13, 2024 in Bali	IRPA & OJK
		Executive Overview Bagi BoC	August 1, 2024, to August 2, 2024, in Jakarta	LPPI
		Boardroom Bound: Accelerating Growth to Embrace The Future BTN	October 25, 2024, in Batam	LPPI
Bambang Widjanarko*	Independent Commissioner	BTN Leadership Forum 2 - 2024	May 2, 2024, to May 4, 2024, in Bali	McKinsey & PwC
		SMR Preparation Level 6	May 6, 2024, in Jakarta	LPPI
		Risk Management Certification for the Board of Commissioners Level 6	May 14, 2024, in Jakarta	LSPP
		Alignment of Risk Management Certification for the Board of Commissioners Level 6	July 23, 2024, to July 25, 2024, in Jakarta	IRPA & OJK
		Executive Overview Bagi BoC	Agustus 1, 2024, to Agustus 2, 2024, in Jakarta	LPPI
		Boardroom Bound: Accelerating Growth to Embrace The Future BTN	October 25, 2024, in Batam	LPPI

Name	Position	Type of Training and Competency/Training	Time and place Implementation	Organizer
Andin Hadiyanto	Commissioner	Executive Risk Management Program - Level 6	January 27, 2024, in Bogor	LPPI
		BTN Leadership Forum 2 - 2024	May 2, 2024, to May 4, 2024, in Bali	McKinsey & PwC
		Risk Management Certification Level 6	March 4, 2024, in Jakarta	LSPP
		Alignment of Risk Management Certification for the Board of Commissioners Level 6	June 27, 2024, to June 28, 2024, in Yogyakarta	IRPA & OJK
		Boardroom Bound: Accelerating Growth to Embrace The Future BTN	October 25, 2024, in Batam	LPPI
Herry Trisaputra Zuna	Commissioner	Executive Risk Management Program - Level 6	January 27, 2024, in Bogor	LPPI
		BTN Leadership Forum 2 - 2024	May 2, 2024, to May 4, 2024, in Bali	McKinsey & PwC
		Preparation for Risk Management Certification Level 6	July 17, 2024, in Jakarta	PT Garda Multi Talenta
		Risk Management Certification Level 6	July 18, 2024, in Jakarta	LSPP
		Alignment of Risk Management Certification for the Board of Commissioners Level 6	July 23, 2024, to July 25, 2024, in Jakarta	IRPA & OJK
		Boardroom Bound : Accelerating Growth to Embrace The Future BTN	October 25, 2024, in Batam	LPPI
Himawan Arief Sugoto	Commissioner	Executive Risk Management Program - Level 6	January 27, 2024, in Bogor	LPPI
		BTN Leadership Forum 2 - 2024	May 2, 2024, to May 4, 2024, in Bali	McKinsey & PwC
		Preparation for Risk Management Certification Level 6	July 17, 2024, in Jakarta	PT Garda Multi Talenta
		Risk Management Certification Level 6	July 18, 2024, in Jakarta	LSPP
		Alignment of Risk Management Certification for the Board of Commissioners Level 6	July 23, 2024, to July 25, 2024, in Jakarta	IRPA & OJK
		Boardroom Bound : Accelerating Growth to Embrace The Future BTN	October 25, 2024, in Batam	LPPI
		Innovation and Entrepreneurship: Cutting-edge Insights from China	November 4, 2024, to November 8, 2024, in Tiongkok	AGLP
Mohamad Yusuf Permana**	Commissioner	Provision of Risk Management Certification KKNI Level 6	January 27, 2024 in Bogor	LPPI

* Appointed at the Annual General Meeting of Shareholders (AGMS) on March 6, 2024, and passed the fit and proper test on October 7, 2024
** Term of office ended on March 4, 2024, as confirmed at the AGMS on March 6, 2024

Orientation Program for New Members of the Board of Commissioners

The Company has always held an Orientation Program or Introduction for newly-appointed members of the Board of Directors to be acquainted with one another and establish cooperation as a solid, comprehensive, effective team. The Orientation Program also aims to provide insight into the condition of the Company in general. The orientation program for the Board of Commissioner is regulated in the Guidelines and Code of Conduct of the Board of Commissioners, namely:

1. Implementation of Good Corporate Governance and Code of Conduct principles in the Company.
2. Description regarding the duties and responsibilities of the Board of Commissioners and Board of Directors and other restrictions.
3. Overview of the Company in terms of the objectives, nature, and scope of the Company's activities, financial performance, and strategies, as well as the Company's short and long-term plans, risks, Internal Control, and other strategic issues.
4. Information related to delegated authorities, internal and external audits, internal control systems, and policies.

In 2024, new members were appointed to the Board of Commissioners at the Company's Annual General Meeting (AGM) on March 6, 2024, namely Ms. Adi Sulistyowati and Mr. Bambang Widjanarko as Independent Commissioners. The orientation program fro new members of the Board of Commissioners was held on March 18, 2024, and May 13, 2024, with the following topics:

1. The objectives and scope of the Company's activities are in accordance with the Articles of Association;
2. Financial performance, strategy, short-term and long-term business plans, as well as the Company's competitive position;
3. Risk management and bank health level;
4. Internal control system, internal audit and external audit;
5. Facilities for members of the Board of Commissioners;
6. Compliance, corporate governance, working relationship patterns of the Board of Commissioners and Directors, and work guidelines and regulations of the Board of Commissioners;
7. Company Culture; and
8. Governance of policies and procedures.

Recommendation, Realization of Duties of The Board of Commissioners, and Supervision on The Implementation of Company Strategyan

The Board of Commissioners has carried out supervisory duties, directing, providing advice, monitoring and evaluating the implementation of the Company's strategic policies, including::

1. Regularly reviewing the Company's performance bankwide and UUS;
2. Monitoring the implementation of the company's planned strategic initiatives on a regular basis;
3. Regularly monitoring of risk management implementation including risk profile, Bank health level, KPMM, risk appetite, risk tolerance and recovery plan;
4. Monitoring the implementation of audits and follow-up on the results of internal and external audits.
5. Monitoring the completion of credit documents;
6. Monitoring the implementation of the Anti-Money Laundering and Prevention of Terrorism Financing (AML-CTF) program.
7. Monitoring the progress of customer data improvement
8. Approval of the preparation of the Company's Long-Term Plan, Business Plan, and Work & Budget Plan along with its amendments.
9. Formulation of the Company's vision and mission
10. Logo change and monitoring of the rebranding project
11. Monitoring the implementation of Internal Control over Financial Reporting
12. Development of the Sharia Business Unit (SBU) development project)
13. Recommendations and Determination of Collegial, Individual and PMN Key Performance Indicators (KPI) including changes;
14. Supervision of the Board of Commissioners over the Performance and Implementation of the Bank's Business Plan.
15. Development of the Company's organization and Human Resources (HR) management strategy;
16. Implementation of the Annual GMS decisions as follows:
    a. Ratification of Annual Reports, Financial Reports and PUMK Financial Reports;
    b. Determination of the use of net profit;
    c. Determination of remuneration (salary/honorarium, facilities and allowances) and bonuses for the Company's Directors and Board of Commissioners;
    d. Appointment of AP and/or KAP to audit Financial Reports and PUMK Program Financial Reports;
    e. Report on the Realization of the Use of Proceeds from the Sustainable Public Offering of Shelf-Registered Bonds IV Bank BTN Phase II 2022 and Additional Capital by Providing Preemptive Rights for Limited Public Offering II (PMHMETD II);
    f. Approval of Amendments to the Company's Articles of Association;
    g. Changes in the Composition and Determination of Remuneration of the Company's UUS Sharia Supervisory Board;
17. Recommendation for the appointment of a Public Accounting Firm (KAP) to audit the Company's annual historical financial reports and PUMK Financial Reports;
18. Appointment of the Company's Corporate Rating Service.

19. Approval of internal provisions of the Company that required the Board of Commissioners approval,
20. Other strategic policies include, among others:
    a. Annual Audit Plan including budget;.
    b. Internal Control System.
    c. Providing Credit/Financing to Related Parties.
    d. Directions for Credit Committee meeting decisions;
    e. Directions for the implementation of the Anti-Bribery Management System;
    f. Operational Activities including Information Technology Infrastructure and Operations.
    g. Activities and Management of Credit and Financing.
    h. Publication of Financial Statements.
    i. New Bank Products (PBB) and activities for the Bank's Interests (KuKB).
    j. Compliance Reports.
    k. Anti-Fraud Strategy.
    l. Sustainable Financial Action Plan.
    m. Evaluation of Audit Services by Public Accounting Firms on Annual Financial Information.
    n. Affiliate Transactions.
    o. Approval of the Recommendation for the Appointment of SEVP.
    p. Recommendations for Nominated Talent BoD-1 and Existing BoD to CTC Financial Services.
    q. Proposed remuneration for the Board of Commissioners, Directors and Sharia Supervisory Board as well as bonuses for the Board of Commissioners and Directorsi.

Performance Assessment of the Board of Directors and The Board of Commissioners

In order to improve work performance and responsibility, the Board of Commissioners and the Board of Directors are committed to implementing policy and conducting performance assessment for the Board of Commissioners and Directors. The Board of Commissioners has its Self-Assessment Policy to assess the Board of Commissioners' performance, while the performance assessment of the Board of Directors is carried out through the achievement of KPIs which refer to the results of measurements carried out by external auditors who audit the company's annual financial reports.

Performance Assessment of the Board of Directors

Performance assessment of the Board of Directors, including the President Director, both collegially and individually is carried out once in 1 (one) year and has been implemented in 2024. .

PROCEDURE OF PERFORMANCE ASSESSMENT OF THE BOARD OF DIRECTORS

The procedure for determining and assessing the performance of the Board of Directors refers to the Regulation of the Minister of BUMN number PER-2/MBU/03/2023 concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises and the Decree of the Minister of BUMN Number SK-306/ MBU/11/2023 concerning Instructions Technical Preparation of Key Performance Indicators for BUMN. BUMN Directors are required to sign an Annual Management Contract which contains the KPI targets for Directors collectively and the KPI Directors individually. .

The KPI of the Directors collectively and the KPI of the Directors individually are effective measuring tools in monitoring the performance and implementation of the duties of the Company Management carried out by the Directors. The procedures for determining and assessing KPIs are regulated in articles 104 and 105 of the Minister of State-Owned Enterprises Regulation PER-2/MBU/03/2023 as follows:

1. The Board of Directors submits the Board of Directors' KPI proposals collegally to the GMS/ Minister to be determined simultaneously with the determination of the Company's Budget Work Plan.
2. Before ratifying the Company's Budget Work Plan, the Board of Commissioners must first consult with state shareholders to determine the KPI for the Board of Directors.
3. Directors are required to translate the KPIs of the Directors collectively into the KPIs of the Directors individually and submit them to the Board of Commissioners for approval.
4. The Board of Directors' KPI achievements are collectively reported in quarterly reports and annual reports.
5. The calculation of the Directors' KPI achievements is reviewed collegially and individually by a public accounting firm that audits the company's financial statements.

CRITERIA OF PERFORMANCE ASSESSMENT OF THE BOARD OF DIRECTORS

Performance Assessment of Collegial Directors

The KPI used to measure and assess the performance of the Board of Directors collegiately in managing the company consists of 5 (five) perspectives, namely as follows:

1. Economic and social values for Indonesia;
2. Business model innovation;
3. Technology leadership;
4. Investment improvement; and
5. Talent Improvement.



PERFORMANCE ASSESSMENT OF INDIVIDUAL DIRECTORS

The Board of Directors' KPI, collectively, is the individual KPI for the President Director. Meanwhile, the KPI of the Directors individually is a cascading of the KPI of the Main Director based on the duties, functions and responsibilities of each Directorate of directors. Details of individual Directors' KPIs are presented in the following table.

No.	Collegial KPI 2024	Weight (%)	Directorate Weight (%)						
			President director	Deputy President Director	SME & Retail Funding	Distribution and Institutional Funding	SEVP Digital Business	Consumer	
A.1. Social Economic Value for Indonesia - Financial		**17.00**							
1.	PPOP	8.00	✓	✓	✓	✓	✓	✓	
2.	ROE Tier 1	6.00	✓	✓	✓	✓	✓	✓	
3.	Total Shareholder Return	3.00	✓	✓	✓	✓	✓	✓	
A.2. Socio-Economic Value for Indonesia - Operational		**15.00**							
4.	Cost of Credit (CoC)	10.00	✓	✓				✓	
5.	Cost to Income Ratio (CIR)	5.00	✓	✓	✓	✓	✓	✓	
A.3. Social Economic Value for Indonesia - Social		**20.00**							
6.	Realization of Subsidized Mortgage Distribution	12.00	✓	✓				✓	
7.	NPS for Bank	8.00	✓	✓					
B. Inovasi Model Bisnis		**8.00**							
8.	CASA Ratio	4.00	✓	✓	✓	✓	✓	✓	
9.	Average Growth of High Yield Segment Credit	4.00	✓	✓	✓			✓	
C. Technology Leadership		**15.00**							
10.	Number of Active Users of Bale by BTN	9.00	✓	✓			✓		
11.	Cyber Security Breach	6.00	✓	✓					
D. Increased Investment		**15.00**							
12.	Environment, Social, Governance (ESG) Rating	6.00	✓	✓	✓	✓	✓	✓	
13.	PMN KPI Realization	3.00	✓	✓					
14.	Sustainable Financing/Credit	6.00	✓	✓	✓			✓	

	Directorate Weight (%)							
	SEVP Wholesale Banking	Assets Management	Risk Management	Information Technology	Finance	Human Capital, Compliance & Legal	Operations & Customer Experience	SEVP Operations
	✓	✓	✓	✓	✓	✓	✓	✓
	✓	✓	✓	✓	✓	✓	✓	✓
	✓	✓	✓	✓	✓	✓	✓	✓
	✓	✓	✓					
	✓	✓	✓	✓	✓	✓	✓	✓
							✓	
	✓	✓	✓	✓	✓	✓	✓	✓
				✓				
	✓	✓	✓	✓	✓	✓	✓	✓
					✓			
	✓							

No.	Collegial KPI 2024	Weight (%)	Directorate Weight (%)						
			President director	Deputy President Director	SME & Retail Funding	Distribution and Institutional Funding	SEVP Digital Business	Consumer	
E. Talent Development		**10.00**							
15.	Human Capital Transformation	10.00	✓	✓					
	Total	**100.00**	**15**	**15**	**8**	**6**	**7**	**10**	
	Total 2022					**9**	**9**	**14**	
	Total 2023					**9**	**9**	**17**	

THE PARTY CONDUCTING THE ASSESSMENT

The performance of the Directors is assessed based on the calculation of the Directors' KPI achievements collegially and individually referring to the results of measurements carried out by external auditors who audit the company's annual financial reports. Furthermore, the Board of Commissioners submits the results of the performance assessment of the Board of Directors collegial and individual to be reported to shareholders. Referring to article 105 paragraph (1) PER-2/MBU/03/2023, the achievements of the Board of Directors' KPI are collectively reported in quarterly reports and annual reports.

BOARD OF DIRECTORS' PERFORMANCE ASSESSMENT RESULTS

Board of Directors' performance assessment was carried out during 2024 with the following assessment results:

No.	Indicator	Weight (%)	Unit	Target	Realization	Achievement (%)	Score
I.	**Economic and Social Value for Indonesia**	**66.00**					
	A. Financial Aspect	**36.00**					
1.	PPOP	8.00	IDR trillion	8.35	5.97	71.56%	**5.72%**
2.	Total Shareholder Return	5.00	%	10.02	9.19	91.72%	**4.59%**
3.	ROE Tier 1	7.00	%	13.09	10.85	82.86%	**5.80%**
4.	CAR	6.00	%	18.86	18.15	96.25%	**5.78%**
5.	Average Growth of Total Deposits	5.00	%	12.36	13.02	105.34%	**5.27%**
6.	Average Growth of Total Loans	5.00	%	12.74	12.54	98.46%	**4.92%**
	B. Operational Aspects	**18.00**					
7.	Cost of Credit (CoC)	7.00	%	1.10	0.60	110.00%	**7.70%**
8.	BOPO	5.00	%	87.25	88.73	98.31%	**4.92%**
9.	Loan at Risk (LaR)	6.00	%	18.95	19.65	96.33%	**5.78%**
	A.3. Social Aspects	**12.00**					
10.	Realization of Subsidized KPR Distribution	7.00	IDR trillion	22.90	24.91	108.79%	**7.62%**
11.	Net Promoter Score (NPS) for Bank	5.00	Score	40.00	47.70	110.00%	**5.50%**

	Directorate Weight (%)							
	SEVP Wholesale Banking	Assets Management	Risk Management	Information Technology	Finance	Human Capital, Compliance & Legal	Operations & Customer Experience	SEVP Operations
						✓		
	8	7	7	7	7	7	7	6
	11	10	13	12	9			-
	10	10	12	12	10			7

No.	Indicator	Weight (%)	Unit	Target	Realization	Achievement (%)	Score
II.	**Business Model Innovation**	**8.00**					
12.	CASA Ratio	3.00	%	53.60	54.09	100.90%	**3.03%**
13.	Number of Active BTN Mobile Users	5.00	Total	1.100.000	1.469.190	110.00%	**5.50%**
III.	**Technology Leadership**	**7.00**					
14.	Implementation of ATM Integration (Project Jalin)	4.00	ATM	445	537	110.00%	**4.40%**
15.	Cyber Security Breach (Zero Incident)	3.00	Laporan	0	0	110.00%	**3.30%**
IV.	**Investment Development**	**11.00**					
16.	Environment, Social, Governance (ESG) Rating	4.00	Rating	BBB	BBB	100.00%	**4.00%**
17.	Sustainable Financing/Credit	4.00	Rp triliun	180.04	181.63	100.88%	**4.04%**
18.	PMN KPI Realization	3.00	%	100.00	93.04	93.04%	**2.79%**
V.	**Talent Development**	**8.00**					
19.	Average Diversity in Nominated Talent (Women & Young)	4.00	%	100.00	108.33	108.33%	**4.33%**
20.	Employee Productivity	4.00	Rp juta	21.31	20.02	93.96%	**3.76%**
	Total	**100.00**					**98.73**

Performance Assessment of The Board of Commissioners

Performance assessment of the Board of Commissioners, both collegially and individually, is carried out once a year and has been implemented in 2024.

PROCEDURE OF PERFORMANCE ASSESSMENT OF THE BOARD OF COMMISSIONERS

The Performance Assessment Procedure for the Board of Commissioners is carried out by means of an independent assessment based on the Regulation of the Minister of State-Owned Enterprises number PER-3/MBU/03/2023 dated March 24, 2023 concerning Organs and Human Resources of State-Owned Enterprises/

CRITERIA OF PERFORMANCE ASSESSMENT OF THE BOARD OF COMMISSIONERS

Collegial Performance Evaluation Criteria for the Board of Commissioners

The performance assessment criteria must be in accordance with the functions of the Board of Commissioners in supervising and providing advice to the Board of Directors, for the interests of the Company and shareholders in particular and stakeholders in general. The primary criteria of the Performance Assessment for the Board of Commissioners include:

1. Financial perspective;
2. Stakeholder perspective;
3. Internal process perspective;

4. Competency development perspective; and/or
5. Other perspectives as needed.

Individual Performance Assessment Criteria for the Board of Commissioners

The main criteria for evaluating the performance of the Board of Commissioners individually include: :

1. Financial;
2. Stakeholders;
3. Internal Process;
4. Learning & Growth;
5. Work Behavior;
6. Additional/Ad Hoc Tasks.

THE PARTY CONDUCTING THE ASSESSMENT

The performance assessment of the Board of Commissioners is carried out using a self-assessment mechanism and is reported or submitted periodically to shareholders.

RESULTS OF THE BOARD OF COMMISSIONERS' PERFORMANCE ASSESSMENT

Results of Collegial Performance Assessment of the Board of Commissioners

The results of the achievement of the performance of the Board of Commissioners in 2024 towards the Key Performance Indicators (KPI) targets determined in the work program are presented as follows:

Board of Commissioners Collegial KPI Table 2024

No.	Indicator	P	Weight	Unit	January to December 2024			
					Target	Realization	Achievement	Value
a	b	c	d	e	j	k	l	m=d×l
1.	**Financial**							**11.40%**
	Budget realization against work plan (investment grade, as a corporate valuation)	Min	10%	%	100	86	114%	11.40%
2.	**Stakeholder**							**12.50%**
	Supervision and Submission of Reports on the Realization of Bank Business Plans and Recovery Plans to the Financial Services Authority periodically in accordance with the provisions	Max	5%	kali	4	4	100%	5.00%
	Reviewing and submitting the Annual Management Report and Supervision Results of the Board of Commissioners of Payment Service Providers (PJP) to Bank Indonesia periodically in accordance with the provisions	Max	5%	kali	2	1	50%	2.50%
	Review, approve and submit reports on the Company's performance oversight duties to the Ministry of State-Owned Enterprises periodically in accordance with the provisions.	Max	5%	kali	4	4	100%	5.00%

No.	Indicator	P	Weight	Unit	January to December 2024			
					Target	Realization	Achievement	Value
a	b	c	d	e	j	k	l	m=d×l
3.	**Internal Process**							**68.00%**
	Organizing and attending Board of Commissioners meetings periodically	Max	10%	kali	36	52	120%	12.00%
	Organizing and attending regular meetings with the Board of Directors	Max	10%	kali	12	12	100%	10.00%
	Ensuring that the Board of Commissioners' Supporting Organ Committee has carried out its duties and functions properly and effectively in accordance with the provisions	Max	10%	%	100	100	100%	10.00%
	Ensure the implementation of GCG principles at all levels of the organization	Max	10%	%	100	100	100%	10.00%
	Review, evaluate, approve, and monitor Company documents and/or policies as needed	Max	20%	%	100	100	100%	20.00%
	Conducting visits to Work Units/Regional Offices/ Branch Offices in order to carry out the supervisory function of the Board of Commissioners	Max	5%	%	2	6	120%	6.00%
4.	**Learning & Growth**							**12.00%**
	Implementing improvements in knowledge, skills, and abilities through participation in seminars/ training according to their field of work.	Max	10%	Jam	20	61	120%	12.00%
Total			**100%**					**103.90%**

Results of Individual Performance Assessment of the Board of Commissioners

As regulated in the Minister of BUMN Regulation Number PER-2/MBU/03/2023 concerning Guidelines for Governance and Significant Corporate Activities of BUMN, the Board of Commissioners is obliged to carry out an annual evaluation of each individual member of the Board of Commissioners. The method determined by the Board of Commissioners in assessing the performance of members of the Board of Commissioners is the self-assessment method which is then reviewed and approved by the Board of Commissioners. Assessment is carried out using key performance indicators that are specific, measurable, achievable, and relevant.

Performance assessment of the members of the Board of Commissioners has been carried out during 2024 with the assessment results based on the following main performance indicators:

Table of Individual Assessments for the Board of Commissioners

No.	Key Performance Indicators (KPI)	Chandra M. Hamzah	Iqbal Latanro	Armand B. Arief	
1.	**FINANCIAL**				
	Budget realization compared to work plan (investment grade, as a corporate valuation)	6.88	6.88	6.88	
2.	**STAKEHOLDER**				
	Supervision and Submission of Reports on the Realization of Bank Business Plans and Recovery Plans to the Financial Services Authority periodically in accordance with the provisions	8.00	8.00	8.00	
	Reviewing and submitting the Annual Management Report and Supervision Results of the Board of Commissioners of Payment Service Providers (PJP) to Bank Indonesia periodically in accordance with the provisions	4.00	4.00	4.00	
	Review, approve and submit reports on the Company's performance oversight duties to the Ministry of State-Owned Enterprises periodically in accordance with regulations..	3.00	3.00	3.00	
3.	**INTERNAL PROCESS**				
	Organize and attend regular Board of Commissioners Meetings	8.00	8.00	8.00	
	Organize and attend regular meetings with the Board of Directors	8.00	8.00	8.00	
	Ensure that the Board of Commissioners' Supporting Organ Committee has carried out its duties and functions properly and effectively in accordance with the provisions.	8.00	8.00	8.00	
	Ensuring the implementation of GCG principles at all levels of the organization	8.00	8.00	8.00	
	Review, evaluate, approve and monitor Company documents and/or policies as needed.	8.00	8.00	8.00	
	Conducting visits to Work Units/Regional Offices/ Branch Offices in order to carry out the supervisory function of the Board of Commissioners	8.00	8.00	8.00	
4.	**LEARNING & GROWTH**				
	Implementing improvements in knowledge, skills and abilities through participation in seminars/training in accordance with their field of work.	8.00	8.00	8.00	
WORK BEHAVIOR					
	AKHLAK	18.80	18.80	18.80	
ADDITIONAL/AD HOC TASKS					
1.	Chairman of the Remuneration and Nomination Committee and Member of the Financial Services CTC of the Ministry of SOEs	1.00			
2.	Chairman of the Audit Committee		1.00		
3.	Chairman of the Risk Monitoring Committee			1.00	
Total Achievement of Key Performance Indicators (KPI)		**97.68**	**97.68**	**97.68**	
Predicate		**Very good**	**Very good**	**Very good**	

Description:

Value	Predicate	Value	Predicate	Value	Predicate
<60	Not Good	<80	Quite Good	<100	Very Good
<70	Less Good	<90	Good	100	Excellent

	Sentot A. Sentausa	Adi Sulistyowati	Bambang Widjanarko	Andin Hadiyanto	Himawan Arief Sugoto	Herry Trisaputra Zuna
	6.88	6.88	6.88	6.88	6.88	6.88
	8.00	8.00	8.00	8.00	8.00	8.00
	4.00	4.00	4.00	4.00	4.00	4.00
	3.00	3.00	3.00	3.00	3.00	3.00
	8.00	8.00	8.00	8.00	8.00	8.00
	8.00	8.00	8.00	8.00	8.00	8.00
	8.00	8.00	8.00	8.00	8.00	8.00
	8.00	8.00	8.00	8.00	8.00	8.00
	8.00	8.00	8.00	8.00	8.00	8.00
	8.00	8.00	8.00	5.33	6.67	5.33
	8.00	8.00	8.00	8.00	8.00	8.00
	18.80	18.80	18.80	18.80	18.80	18.80
	96.68	**96.68**	**96.68**	**94.01**	**95.35**	**94.01**
	Very good	**Very good**	**Very good**	**Very good**	**Very good**	**Very good**

Assessment of the Performance of Committees Under the Board of Commissioners and the Basis of its Assessment

The Board of Commissioners periodically assesses the effectiveness of the performance of the Committees under the Board of Commissioners. The Board of Commissioners has assessed that during 2024, the Committees have carried out their duties and responsibilities quite effectively. The results of the performance assessment of the committees under the Board of Commissioners are as follows:

Procedure for the Performance Evaluation of the Board of Commissioners

The Board of Commissioners is assisted by 3 (three) committees, namely the Audit Committee, Remuneration and Nomination Committee, and Risk Monitoring Committee. The Board of Commissioners conducts an annual assessment of the effectiveness of the performance of the Committees under the Board of Commissioners. The assessment in question is based on the Minister of State-Owned Enterprises Regulation number PER-3/ MBU/03/2023 dated March 24, 2023 concerning Organs and Human Resources of State-Owned Enterprises and FSA Regulation number 17 of 2023 concerning the Implementation of Governance for Commercial Banks.

Criteria for Performance Evaluation of Committees Under the Board of Commissioners

Audit Committee performance assessment is based on specific, measurable, achievable and relevant benchmarks or assessment criteria contained in the main performance assessment indicators with the following aspectsikut:

1. Regular Aspects.
2. Non-Regular Aspects.
3. Other Aspects.

The performance assessment of the Remuneration and Nomination Committee is based on specific, measurable, achievable and relevant benchmarks or assessment criteria contained in the main performance assessment indicators contained in the main performance assessment indicators with the following aspects::

1. Financial Aspect.
2. Customer Aspect.
3. Internal Process Aspect.
4. Learning & Growth Aspect.

The performance assessment of the Risk Monitoring Committee is based on specific, measurable, achievable and relevant benchmarks or assessment criteria contained in the main performance assessment indicators with the following aspects:

1. Aspects of Task and Responsibility Fulfilment.
2. Aspects of Planning and Reporting.
3. Aspects of Operations and Competency Development.
4. Dynamic Aspects.

Party Carrying Out the Assessment

Performance evaluation of Committees under the Board of Commissioners is carried out periodically using the self-assessment method and then submitted to the Board of Commissioners for review and approval.

Results of the Performance Assessment of the Committee Under the Board of Commissioners

The Board of Commissioners considers that throughout 2024, the Committees have carried out their duties and responsibilities quite effectively. The results of the performance assessment of committees under the Board of Commissioners are as follows.

PERFORMANCE ACHIEVEMENTS OF THE AUDIT COMMITTEE

The Audit Committee assessment is evaluated based on the Key Performance Indicators working paper as follows:

No.	Key Performance Indicators	Realization	Target	Achievement	Weight (%)	Score (%)
		a	b	c=a/b	d	e=c×d
I.	REGULER				80	88.75
1.	Providing recommendations for Approval of the Annual Audit Plan to the Board of Commissioners	1	1	100%	10	10.00
2.	Monitoring and evaluation of the implementation of Internal and External Audits including follow-up of audit results, and monitoring of the effectiveness of internal control.	5	4	125%	15	18.75

No.	Key Performance Indicators	Realization	Target	Achievement	Weight (%)	Score (%)
		a	b	c=a/b	d	e=c×d
3.	Attending the Internal General Audit Exit Meeting	4	4	100%	10	10.00
4.	Checking and evaluating the Quarterly Published Financial Reports	4	4	100%	10	10.00
5.	Providing recommendations regarding the appointment of KAP and Evaluation of the Implementation of KAP Audit Services to the Board of Commissioners	3	2	150%	10	15.00
6.	Reviewing, evaluating, and providing input to the Board of Commissioners regarding monthly Performance Review material	12	12	100%	10	10.00
7.	Preparing quarterly and annual reports regarding Audit Committee activities to the Board of Commissioners	4	4	100%	5	5.00
8.	Preparing the Board of Commissioners' response to the Company's performance (quarterly) which is submitted to the Minister of BUMN and Semesterly to OJK	6	6	100%	10	10.00
II.	NON REGULER				5	10.00
9.	Competency Development related to Duties and Responsibilities (training hours)	87	20	200%	5	10.00
IV.	OTHERS				15	30.00
10.	Audit Committee Meeting	39	12	200%	15	30.00
	Total				100	128.75

PERFORMANCE ACHIEVEMENTS OF THE REMUNERATION AND NOMINATION COMMITTEE

The Remuneration and Nomination Committee assessment is evaluated based on the Key Performance Indicators working paper as follows:

No.	Productivity	Realization	as per December 2024			
			Target	Achievement	Weight (%)	Score (%)
		a	b	c=a÷b	d	e=c×d
I.	FINANCIAL					
1.	Monitoring and Evaluation of the Board of Commissioners' Budget Realization	2	2	100%	10	10
II.	CUSTOMER					
2.	Reviewing the Bank Business Plan Report (RBB), Company Work Plan and Budget (RKAP) and Sustainable Finance Action Plan as well as Self-Assessment to the Bank Regarding GCG.	1	1	100%	5	5
3.	Recommendations and Assessment of Candidate Members of the Board of Commissioners and Board of Directors related to the implementation of the Company's GMS	1	1	100%	5	5

No.	Productivity	Realization	as per December 2024			
			Target	Achievement	Weight (%)	Score (%)
		a	b	c=a÷b	d	e=c×d
4.	Conducting Communication and Coordination with the Human Resources Work Unit	10	6	166.67%	5	6
5.	Validation of BOD-1 Bank BTN Selected Talent Proposal	1	1	100%	5	5
6.	Preparing the Board of Commissioners' Supervision Report regarding Human Resources	1	1	100%	5	5
III.	INTERNAL PROCESS					
7.	Holding Remuneration and Nomination Committee Meetings	9	5	180%	20	24
8.	Determination of income, amount of bonuses, bonuses and other incentives for the Board of Commissioners, Board of Directors and Sharia Supervisory Board	1	1	100%	5	5
9.	Recommendations for Proposed Candidates for Head of Internal Audit Work Unit, Corporate Secretary and Supporting Organs of the Board of Commissioners	1	1	100%	5	5
10.	Evaluation of Internal Policies related to Human Resources	1	1	100%	10	10
11.	Review of Collegial and Individual Key Performance Indicators (KPI) of the Board of Commissioners and Directors	1	1	100%	5	5
12.	Preparing the Board of Commissioners' Work Program	1	1	100%	5	5
13.	Preparing the Remuneration and Nomination Committee Work Program	1	1	100%	5	5
14.	Preparing the Report on the Realization of the Remuneration and Nomination Committee's Work Program	3	2	150%	5	6
IV.	LEARNING & GROWTH					
15.	Participate in competency development programs (training, seminars, workshops, certification, etc.) and carry out additional tasks assigned by the Committee Chairperson and/or Board of Commissioners.	4	3	133.33%	5	6
Total					**100**	**107**

PERFORMANCE ACHIEVEMENTS OF THE RISK MONITORING COMMITTEE

The Risk Monitoring Committee's assessment is evaluated based on the Key Performance Indicators working paper as follows:

No.	Productivity	Realization	as per December 2024			
			Target	Achievement	Weight (%)	Score (%)
		a	b	c=a÷b	d	e=c×d
I.	**ASPECT OF FULFILLMENT OF DUTIES AND RESPONSIBILITIES**				60	65
1.	Reviewing the Risk Profile Report	4	4	100.00	10	10
2.	Reviewing Bank's Soundness Level Reports	2	2	100.00	10	10
3.	Review and Feedback on Risk Appetite and Risk Tolerance	4	1	200.00	5	10
4.	Review of Bank Business Plan (RBB) and Company Work Plan & Budget (RKAP)	1	1	100.00	5	5
5.	Review of the Sustainable Finance Action Plan (RAKB)	1	1	100.00	5	5
6.	Recovery Plan Initiation Review	1	1	100.00	5	5
7.	Review of the Preparation of the Resolution Plan	1	1	100.00	5	5
8.	Review of Risk Management Policy Guidelines (PKMR)	1	1	100.00	5	5
9.	Review of Compliance Reports	4	4	100.00	5	5
10.	Self-Assessment Report on the Implementation of Corporate Governance	2	2	100.00	5	5
II.	**PLANNING AND REPORTING ASPECTS**				15.00	15.00
11.	Quarterly Activity Realization Report	4	4	100.00	5	5
12.	Annual Activity Realization Report	1	1	100.00	5	5
13.	Annual Work Program for the Following Year	1	1	100.00	5	5
III.	**ASPECTS OF OPERATIONAL AND COMPETENCY DEVELOPMENT**				15.00	30.00
14.	Conducting Committee Meetings	61	12	200.00	10	20
15.	Competency Development Related to Duties and Responsibilities	129.00	20	200.00	5	10
IV.	**DYNAMIC ASPECT**				10	11.11
16.	Carrying out other duties in accordance with the Risk Management Division	100%	90%	111.11	10	11.111
	Total				**100**	**121.11**

Mechanism for The Dismissal and Resignation of The Board of Commissioners

1. The dismissal or replacement of members of the Board of Commissioners must prioritize the best interests of the Company.
2. The dismissal or replacement of members of the Board of Commissioners, as mentioned above, which takes place before the end of the member's term, must consider at least the following:
   a. the member of the Board of Commissioners is deemed unable to perform their duties and responsibilities in managing and implementing the Company's health strategy;
   b. the dismissal or replacement of the members of the Board of Commissioners is not based on subjective assessments from shareholders but is based on objective evaluations related to the management of the Company;
   c. the dismissal or replacement of members of the Board of Commissioners has gone through the planning and applicable mechanism, which at least takes into account the assessment from the committee responsible for the nomination function and has been scheduled in the AGM;
   d. the dismissal or replacement of members of the Board of Commissioners does not result in issues within the organization and business activities of the Company;
   e. the implementation of the dismissal or replacement of members of the Board of Commissioners prioritizes good communication patterns with relevant parties; and
   f. the process is carried out with a focus on implementing good corporate governance and the principle of prudence.
   g. members of the Board of Commissioners are dismissed by the AGM.
3. The dismissal of a member of the Board of Commissioners takes effect from the closing of the AGM.
4. A member of the Board of Commissioners may be dismissed at any time based on the decision of the AGM if there is evidence of the following:
   a. failure to perform their duties;
   b. violation of the Articles of Association and/or applicable laws and regulations;
   c. involvement in actions that harm the Company and/or state;
   d. engagement in actions that violate ethics and/or propriety that should be respected as a member of the Board of Commissioners;
   e. being found guilty by a court decision that has permanent legal force;
   f. resignation;
   g. other reasons deemed appropriate by the AGM in the best interests and objectives of the Company.
5. The decision of dismissal as referred to in point 3, letters a, b, c, d, and g, is made after the individual is given the opportunity to defend themselves in the AGM.
6. If there is a family relationship between a member of the Board of Commissioners and a member of the Board of Directors up to the third degree, either through direct or collateral lineage, including relationships arising from marriage, the AGM is authorized to dismiss one of them.
7. A member of the Board of Commissioners has the right to resign from their position before the term ends by notifying the Company in writing of their intention.
8. A member of the Board of Commissioners who is a candidate for:
   a. A member of the House of Representatives (DPR), Regional House Representatives (DPRD), or Regional representative Council (DPD);
   b. President or Vice President, and/or
   c. Governor, Deputy Governor, Regent, Deputy Regent, Mayor, or Deputy Mayor

   must resign and/or be dismissed from their position as a member of the Board of Commissioners under the Applicable laws and regulations, while observing their rights and obligations as stipulated by the regulations.
9. The Company is required to hold an AGM to decide on the resignation request of a member of the Board of Commissioners within a maximum period of 90 (ninety) days after receiving the written notice of resignation.
10. If the member of the Board of Commissioners resigns, causing the number of members of the Board of Commissioners to become less than 3 (three) people, the resignation is valid if it has been approved by the AGM and a new member of the Board of Commissioners has been appointed.

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

BOARD OF DIRECTORS AND BOARD OF COMMISSIONERS NOMINATION PROCEDURES

Board of Directors Nomination Procedure

The nomination procedure for Directors has been regulated in Special Policy No. KK.6-F dated 25 August 2023 concerning Good Corporate Governance Procedures. The nomination procedures for Directors are as follows:

1. Members of the Board of Directors are appointed and dismissed by GMS.
2. The selection of prospective members of the Board of Directors is carried out through a transparent selection and nomination process, taking into account the

recommendations of the Board of Commissioners based on the study of the Remuneration and Nomination Committee, considering expertise, integrity, honesty, leadership, experience, behavior, dedication, and the adequacy of time for the progress of the Bank.
3. Candidates for members of the Board of Directors who are internal officials of the Company may be proposed by the Commissioners through a review of the Remuneration and Nomination Committee.
4. The appointment of members of the Board of Directors is carried out through a fit and proper test mechanism. Prospective members of the Board of Directors who pass the test must sign a management contract before being appointed as the Board of Directors.

Board of Commissioners Nomination Procedure

The nomination procedures for the Board of Commissioners are regulated in Special Policy No. KK.6-F dated 25 August 2023 concerning Good Corporate Governance Procedures and Work Guidelines and Regulations for the Board of Commissioners. The nomination procedures for the Board of Commissioners are:

1. Members of the Board of Commissioners are appointed and dismissed by GMS.
2. The selection of prospective members of the Board of Commissioners is carried out through a transparent selection and nomination process, taking into account the recommendations of the Board of Commissioners based on the study of the Remuneration and Nomination Committee, considering expertise, integrity, honesty, leadership, experience, behavior, dedication, and the adequacy of time for the progress of the Bank

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

Remuneration Policy of the Board of Commissioners and Directors

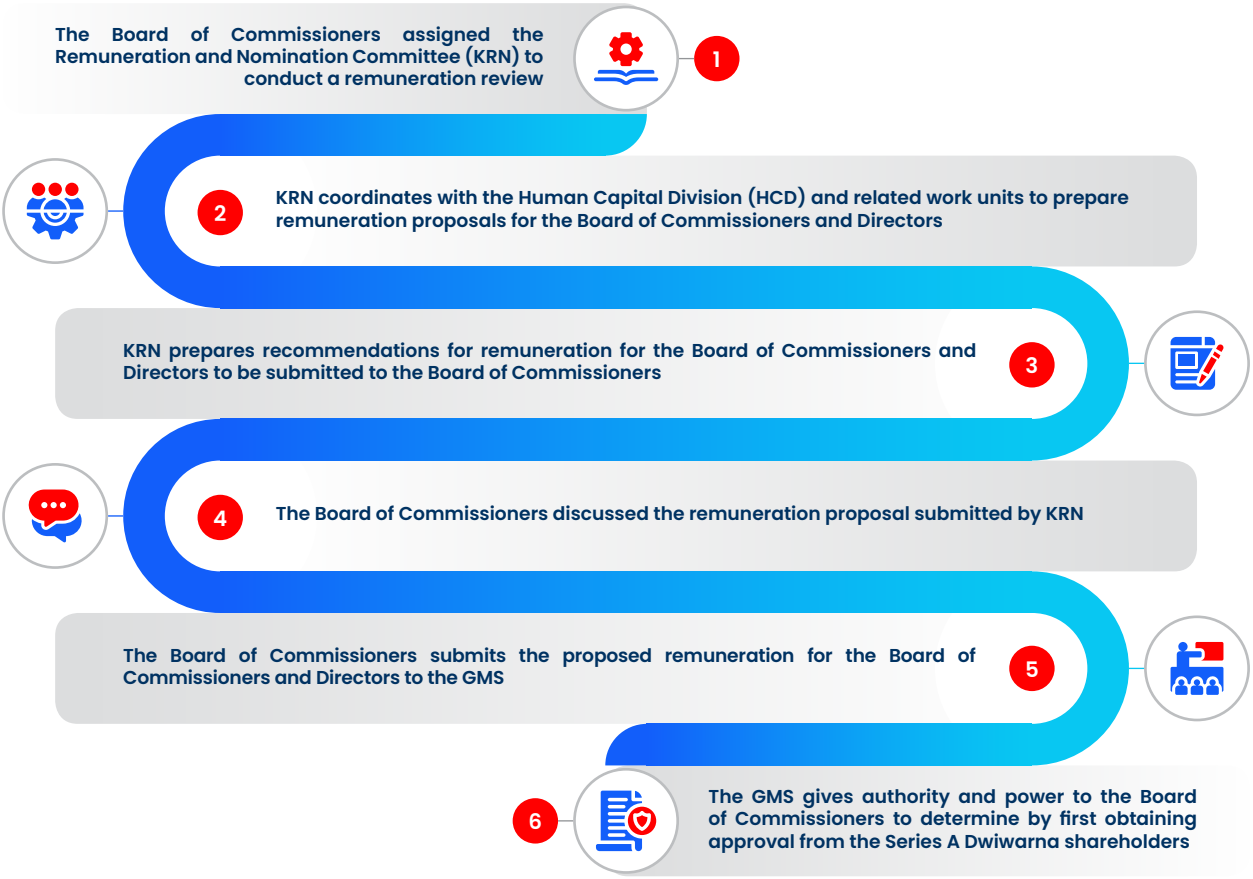
The preparation of the remuneration policy is inseparable from the Company's capabilities and is always based on a competitive, fair, and risk-based basis that is in line with the directions and policies of the OJK. To keep remuneration competitive, the Company always performs benchmarking through surveys conducted by independent parties.

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

The Company has issued a Special Policy (KK) No. 3-D regarding the Income of the Board of Directors, Board of Commissioners, SEVP, and supporting organs of the Board of Commissioners. The coverage aspects of this policy include, among others, the objectives of implementing governance in providing remuneration, variable remuneration and material risk takers. The Company determines remuneration for the Board of Commissioners and Directors referring to the provisions of the Minister of State-Owned Enterprises Regulation Number PER-3/MBU/03/2023 dated 20 March 2023 concerning Organs and Human Resources of State-Owned Enterprises and the Decree of the Minister of State-Owned Enterprises Number SK-181 /MBU/07/2023 dated 4 July 2023 concerning Determination of the Income of the Directors, Board of Commissioners and Supervisory Board of State-Owned Enterprises in 2023, namely the amount of income of the Board of Commissioners and Directors is determined by the General Meeting of Shareholders (GMS).

The policy established at the General Meeting of Shareholders (GMS) grants authority and power to the Series A Dwiwarna Shareholder to determine the amount of tantiem for the 2024 fiscal year, as well as determine the salary/honorarium, allowances, facilities and other incentives for the Board of Commissioners and Directors as well as granting authority and power to the Board of Commissioners by first obtaining written approval from the Series A Dwiwarna Shareholders to determine the amount of tantiem, salary/ honorarium, allowances, facilities and other incentives for the Board of Directors.
The procedures for determining the remuneration for the Board of Commissioners and the Board of Directors are as follows:

Procedure for Determining The Remuneration for The Board of Directors and Board of Commissioners:



The scope of the Company's remuneration policy has been adjusted to OJK Regulation No. 5/POJK.03/2015 and OJK Circular Lette No. 40/ SEOJK.03/2016 on the Implementation of Governance in Providing Remuneration for Commercial Banks, including:

1. The principle of prudence in remuneration is based on performance and risk.
2. Determination of Material Risk Taker (MRT) is categorized as follows:
   a. Material Risk Takers (MRT) can be determined using qualitative methods according to the portion of responsibility that affects the main risk profile which will be determined in accordance with the risk profile evaluation determined by the Company every year.
   b. Determination of the MRT category can also be conducted quantitatively through a comparison of variable remuneration between MRT and non-MRT employees with consideration of performance and also the risk level of the position in question.
3. The implementation of variable remuneration is in accordance with regulatory provisions regarding the application of remuneration for commercial banks.

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Indicators for Determining Remuneration for Directors and Board of Commissioners

The Company refers to the Regulation of the Minister of State-Owned Enterprises Number PER-3/MBU/03/2023 dated March 20, 2023 concerning Organs and Human Resources of State-Owned Enterprises and Decree of the Minister of State-Owned Enterprises Number SK-181/MBU/07/2023 dated July 4, 2023 concerning Determination of Remunerations of Directors, Board of Commissioners, and Supervisory Board of State-Owned Enterprises in 2023. Salary/Honorarium for members of the Board of Directors and Board of Commissioners is determined, based on the following factors:

1. Business scale factor
2. Business complexity factor
3. Inflation rate
4. Company's financial condition and capability
5. Other factors that are relevant, and may not conflict with laws and regulations

6. The composition of the Salary/Honorarium of the Board of Directors and the Board of Commissioners is determined as follows:
   a. The President Director's salary is determined using the internal guidelines set by the Minister.
   b. The Vice President Director's salary is 95% of the President Director's salary.
   c. The salary of other members of the Board of Directors is 85% of the President Director's salary.
   d. The Main Commissioner's honorarium is 45% of the President Director's salary.
   e. The honorarium for the Vice President Commissioner is 42.5% of the salary for the President Director.
   f. The honorarium for members of the Board of Commissioners is 90% of the President Commissioner's salary.

Meanwhile, the Company's internal regulations are regulated in the provisions of Special Policy No. KK.3-D concerning the Income of the Board of Directors, Board of Commissioners, Senior Executive Vice President (SEVP), and Supporting Organs of the Board of Commissioners.

Remuneration consists of a remuneration structure that is oriented towards the Company's sustainable development and encourages the achievement of long-term goals.

Structure and Amount of Nominal/ Remuneration for Each Director and Board of Commissioners

In accordance with the provisions of Special Policy (KK) 3.D Regarding the Income of the Board of Directors, Board of Commissioners, Senior Executive Vice President (SEVP) and Supporting Organs of the Board of Commissioners, the remuneration structure indicating the types and/ or short-term, long-term and/or post-employment rewards is as follows:

1. Types of short-term remuneration consist of: Honorarium, Allowances (holidays, transportation), Facilities (health, legal aid) and Tantiem.
2. Types of long-term and/or post-employment remuneration consist of Post-Employment Insurance and can also be given long-term incentives (LTI) and Tantiem/Work Incentives, where in the Tantiem can be given additional long-term incentives (LTI)).

The remuneration components of the Board of Commissioners and Directors are regulated as follows:

1. The income of the Bank's Board of Directors and Board of Commissioners is determined by the GMS/ Minister.
2. The income of SEVP is determined by the Board of Directors.
3. The income of members of the Bank's Board of Directors may consist of:
   - Salary;
   - Allowances;
   - Facilities;
   - Tantiem / Work Incentive / Special Incentive; and
   - LTI.
4. The income of members of the Bank's Board of Commissioners may consist of:
   - Honorarium;
   - Allowance;
   - Facilities;
   - Tantiem / Work Incentive / Special Incentive; and
   - LTI.
5. SEVP member earnings
   - Salary;
   - Allowances;
   - Facilities;
   - Tantiem / Work Incentive / Special Incentive; and
   - LTI.

As of December 31, 2024, the Company has not provided long-term incentives (LTI) to members of the Board of Directors and members of the Board of Commissioners.

Ensure that BTN discloses information regarding details of remuneration and the total paid to each member of the Board of Directors, including the President Director:

No.	Name	Position	Fees		
			Salary/ Honorarium	Tantiem	
1.	Chandra Martha Hamzah	President Commissioner / Independent	✓	✓	
2.	Iqbal Latanro	Vice President Commissioner / Independent	✓	✓	
3.	Armand B Arief	Independent Commissioner	✓	✓	
4.	Sentot A Sentausa	Independent Commissioner	✓	✓	
5.	Andin Hadiyanto	Commissioner	✓	✓	
6.	Herry Trisaputra Zuna	Commissioner	✓	✓	
7.	Himawan Arief Sugoto	Commissioner	✓	✓	
8.	Adi Sulistyowati **	Independent Commissioner	✓	✓	
9.	Bambang Widjanarko **	Independent Commissioner	✓	✓	
10.	Mohamad Yusuf Permana ***	Commissioner	✓	✓	
	NUMBER OF BOARD OF COMMISSIONERS		17,752,317,580	40,925,306,100	
1.	Nixon L P. Napitupulu	President Director	✓	✓	
2.	Oni Febriarto Rahardjo	Vice President Director	✓	✓	
3.	Andi Nirwoto	Director of Information Technology	✓	✓	
4.	Elisabeth Novie Riswanti	Director of Assets Management	✓	✓	
5.	Jasmin	Director of Distribution & Institutional Funding	✓	✓	
6.	Setiyo Wibowo	Director of Risk Management	✓	✓	
7.	Hirwandi Gafar	Director of Consumer	✓	✓	
8.	Nofry Rony Poetra	Director of Finance	✓	✓	
9.	Eko Waluyo	Director of Human Capital, Compliance & Legal	✓	✓	
10.	Hakim Putratama	Director of Operations & Customer Experience	✓	✓	
11.	Muhammad Iqbal **	Director of SME & Retail Funding	✓	✓	
	NUMBER OF DIRECTORS		44,766,872,581	103,433,604,000	

Notes :
*). Provided to officials who do not occupy official residences.
**). Appointed at the 2024 Annual General Meeting of Shareholders (AGMS) on March 6, 2024.
***). Ended term of office at the 2024 AGMS on March 6, 2024.

	Allowance			Other Facilities				PPh21 allowance	Total
	Holiday Allowance	Retirement Insurance & BPJS Insurance	Housing Allowance*	Transportation Facilities/ Allowances	Health Facilities	Legal Assistance Facilities	Others (Natura Facilities)		
	✓	✓	-	✓	✓	-	-	✓	✓
	✓	✓	-	✓	✓	-	-	✓	✓
	✓	✓	-	✓	✓	-	-	✓	✓
	✓	✓	-	✓	✓	-	-	✓	✓
	✓	✓	-	✓	✓	-	-	✓	✓
	✓	✓	-	✓	✓	-	-	✓	✓
	✓	✓	-	✓	✓	-	-	✓	✓
	✓	✓	-	✓	✓	-	-	✓	✓
	✓	✓	-	✓	✓	-	-	✓	✓
	✓	✓	-	✓	✓	-	-	✓	✓
	1,622,720,000	3,777,493,892	-	3,466,200,000	3,244,748,818	-	-	9,853,613,338	80,642,399,728
	✓	✓	✓	✓	✓	-	✓	✓	✓
	✓	✓	✓	✓	✓	-	✓	✓	✓
	✓	✓	✓	✓	✓	-	✓	✓	✓
	✓	✓	✓	✓	✓	-	✓	✓	✓
	✓	✓	✓	✓	✓	-	✓	✓	✓
	✓	✓	✓	✓	✓	-	✓	✓	✓
	✓	✓	✓	✓	✓	-	✓	✓	✓
	✓	✓	✓	✓	✓	-	✓	✓	✓
	✓	✓	✓	✓	✓	-	✓	✓	✓
	✓	✓	✓	✓	✓	-	✓	✓	✓
	✓	✓	✓	✓	✓	-	-	✓	✓
	3,791,350,000	12,634,242,770	3,575,000,000	9,141,610,662	3,100,304,215	-	233,921,500	33,949,967,455	214,626,873,183

Diversity Policy for the Board of Directors and Board of Commissioner

Diversity of Policy for the Board of Commissioners and Directors The diversity policy for the composition of the Company's Board of Commissioners and Directors is regulated in the Articles of Association and Board Manual which stipulate that the Board of Commissioners and Directors are a combination of professionals who have the knowledge and experience required by the Company to enable an effective decision-making process, efficient and immediate. In determining the members of the Board of Commissioners and Directors, the Company always strives to ensure that the composition of the Board of Commissioners and Directors is diversein terms of competency, gender and age (presence of young top talent).

The diversity of the composition adapts to the needs, level of complexity and the Company's strategic plan so it is expected that the development or resolution of a problem can be overlooked from various educational perspectives, competencies, and experience
.

In accordance with the diversity policy set by the Ministry of SOEs, the target ratio of women in nominated talent is 25% and the target ratio of young top talent (≤ 42 years old) in nominated talent is 15%. The target achievement in 2024 shows that the ratio of women in nominated talent is 28% and the ratio of young top talent (≤ 42 years old) in nominated talent is 16%. Going forward, the Company will strive to be consistent in ensuring the diversity of the Board of Commissioners and Board of Directors, especially regarding gender and age diversity..

Diversity in the Composition of the Board of Directors

Diversity Aspects in the Composition of the Board of Directors, including:

1. Age
   Members of the Board of Directors represent a diverse range of age groups.
2. Gender
   Gender diversity is considered among the members of the Board of Directors.
3. Education, Experience, and Expertise; having at least:
   a. One member with expertise/work experience/ education in economics, business, or finance;
   b. One member with expertise/work experience/ education in the banking industry; and/or
   c. One member with expertise/work experience/ education in risk management.

The diverse composition of the Company's Board of Directors is presented in the table below..

Table of Diversity in the Composition of the Board of Directors

Name	Position	Age	Gender	Education	Work Experience	Expertise
Nixon L.P. Napitupulu	President Director	55 years old	Male	Bachelor of Economics	Experience in banking	Economics
Oni Febriarto Rahardjo	Vice President Director	53 years old	Male	Bachelor of Engineering Master of Management	Experience in banking	Management
Andi Nirwoto	Director of Information Technology	54 years old	Male	Bachelor of Engineering, Master of Finance	Experience in banking	Engineering, Finance
Elisabeth Novie Riswanti	Director of Assets Management	57 years old	Female	Bachelor of Law (Civil Law)	Experience in banking	Law
Jasmin	Director of Distribution and Institutional Funding	60 years old	Male	Bachelor of Economics (Accounting), International Business Degree	Experience in banking	Accounting, Business

Name	Position	Age	Gender	Education	Work Experience	Expertise
Setiyo Wibowo	Director Of Risk Management	47 years old	Male	Bachelor of Electrical Engineering, MBA in Finance & Banking	Experience in banking	Engineering, Finance
Hirwandi Gafar	Director of Consumer	56 years old	Male	Bachelor of Civil Engineering	Experience in banking	Civil Engineering
Nofry Rony Poetra	Director of Finance	56 years old	Male	Bachelor of Economics, MBA in Business	Experience in banking	Economics
Eko Waluyo	Director of Human Capital, Compliance, and Legal	53 years old	Male	Bachelor of Economics, Master of Management, MBA from Gatoon College of Business, Short Course Program in Cooperation with MM UGM	Experience in banking	Economics, Management
Hakim Putratama	Director of Operations & Customer Experience	48 years old	Male	Bachelor of Political Science, Master of Science	Experience in banking	International Relations, International Business
Muhammad Iqbal*	Director of SME & Retail Funding	51 years old	Male	Bachelor of Industrial Engineering, Master of General Management, Master of Business Administration	Experience in banking	Management

* Appointed during the Annual General Meeting of Shareholders (AGMS) on March 6, 2024, and passed the fit and proper test on August 8, 2024.

DIVERSITY IN THE COMPOSITION OF THE BOARD OF COMMISSIONERS

The diversity aspects in the composition of the Board of Commissioners include:

1. Age
   Members of the Board of Commissioners represent a variety of age groups.
2. Gender
   Gender diversity is taken into consideration for the members of the Board of Commissioners.
3. Education, Experience, and Expertise; The Board of Commissioners includes at least:
   a. One member with expertise/work experience/education in economics, business, or finance;
   d. One member with expertise/work experience/education in the banking industry; and/or
   e. One member with expertise/work experience/education in risk management.
4. Independence
   a. The majority of the Board of Commissioners members are Independent Commissioners.
   b. The tenure of Independent Commissioners is limited to 2 (two) consecutive terms or a maximum of 10 (ten) years.

The diversity in the composition of the Board of Commissioners is presented in the table below

Table of Diversity in Composition of the Board of Commissioners

Name	Position	Period	Age	Gender	Education	Work Experience	Expertise
Chandra M. Hamzah	Komisaris Utama/ Independen	Second	57 years old	Male	Sarjana (S1) Hukum	Memiliki pengalaman kerja pada *Law Firm* dan Komisi Pemberantasan Korupsi	Hukum, Keuangan, dan *People Management*
Iqbal Latanro	Wakil Komisaris Utama/ Independen	First	66 years old	Male	• Sarjana (S1) Ekonomi • Magister (S2) Manajemen Bisnis	Memiliki pengalaman kerja pada Jasa Keuangan dan Jasa Pemeringkat Efek	Perbankan, Kepatuhan, dan Manajemen Risiko
Armand B. Arief	Komisaris Independen	Second	72 years old	Male	• Sarjana (S1) *Business Administration* • Master (S2) *Business Administration*	Memiliki pengalaman kerja pada Jasa Keuangan dan Regulator Keuangan	Perbankan, Manajemen Risiko, dan Manajemen Bisnis
Sentot A. Sentausa	Komisaris Independen	First	67 years old	Male	• Sarjana (S1) Statistika • Master (S2) *Business Administration*	Memiliki pengalaman kerja pada Jasa Keuangan	Statistika, Manajemen Bisnis, Perbankan, dan Manajemen Risiko
Adi Sulistyowati*	Komisaris Independen	First	57 years old	Female	Sarjana (S1) Ekonomi Manajemen	Memiliki pengalaman kerja pada Jasa Keuangan	Perbankan, Manajemen Risiko, dan Manajemen Bisnis
Bambang Widjanarko*	Komisaris Independen	First	61 years old	Male	• Sarjana (S1) Akuntansi • Magister (S2) Bisnis dan Keuangan	Memiliki pengalaman kerja pada Regulator Keuangan	Akuntansi, Audit, Perbankan Syariah, dan Manajemen Bisnis
Andin Hadiyanto	Komisaris	Second	58 years old	Male	• Sarjana (S1) Ekonomi • Master (S2) *International Development* • Doctor (S3) *International Development*	Memiliki pengalaman kerja pada Kementerian Keuangan RI, Kementerian Perdagangan, World Bank Asian Infrastruktur Investment Bank (AIIB) dan AMRO	Keuangan dan Ekonomi Makro
Herry Trisaputra Zuna	Komisaris	First	56 years old	Male	• Sarjana (S1) Teknik Sipil • Sarjana (S1) Manajemen • Magister (S2) Sistem dan Teknik Jalan Raya • Doktor (S3) Teknik Sipil	Memiliki pengalaman kerja pada Kementerian Kementerian Pekerjaan Umum dan Perumahan Rakyat	Ekonomi, Teknik Pembangunan Perumahan dan Infrastruktur

Name	Position	Period	Age	Gender	Education	Work Experience	Expertise
Himawan Arief Sugoto	Komisaris	First	60 years old	Male	• Sarjana (S1) Teknik Sipil • Magister (S2) Teknik Sipil	Memiliki pengalaman kerja pada Kementerian Kementerian Agraria dan Tata Ruang/Badan Pertanahan Nasional	Properti, Distribusi dan Perdagangan, Manajemen.
Mohamad Yusuf Permana**	Komisaris	First	48 years old	Male	Sarjana (S1) Ekonomi	Memiliki pengalaman kerja pada Kementerian Sekretariat Negara dan perusahaan BUMN	Perbankan, Kepatuhan, dan Manajemen Risiko

* Appointed during the Annual General Meeting of Shareholders (AGMS) on March 6, 2024, and passed the fit and proper assessment on October 7, 2024
** Term ended on March 4, 2024, as confirmed in the AGMS on March 6, 2024

Transparency of Share Ownership of the Board of Directors and Board of Commissioners

Share Ownership of Members of the Board of Directors and the Board of Commissioners

The Board of Directors and Board of Commissioners have disclosed their and/or family's share ownership which reaches 5% or more in the Company or other companies domiciled inside and outside the country. For share ownership up to December 31, 2023, the Board of Directors and the Board of Commissioners do not own shares with total ownership reaching 5% or more, both in the Company and other companies.

Board of Directors Share Ownership of 5% or More

Name	Position	Share Ownership (shares)			
		Bank BTN	Other Banks	Financial institutions	Other Companies
Nixon L.P. Napitupulu	President Director	Nil	Nil	Nil	Nil
Oni Febriarto Rahardjo	Vice President Director	Nil	Nil	Nil	Nil
Andi Nirwoto	Director of IT and Digital	Nil	Nil	Nil	Nil
Elisabeth Novie Riswanti	Director of Assets Management	Nil	Nil	Nil	Nil
Jasmin	Director of Distribution and Funding	Nil	Nil	Nil	Nil
Setiyo Wibowo	Director of Risk Management	Nil	Nil	Nil	Nil
Hirwandi Gafar	Director of Consumer	Nil	Nil	Nil	Nil
Nofry Rony Poetra	Director of Finance	Nil	Nil	Nil	Nil
Eko Waluyo	Director of Human Capital, Compliance, and Legal	Nil	Nil	Nil	Nil
Hakim Putratama	Director of Institutional Banking	Nil	Nil	Nil	Nil
Muhammad Iqbal*	Director of SME & Retail Funding	Nil	Nil	Nil	Nil

*Appointed during the Annual General Meeting of Shareholders (AGMS) on March 6, 2024, and passed the fit and proper test on August 8, 2024.

Board of Commissioners Share Ownership of 5% or More

Name	Position	Share Ownership (shares)			
		Bank BTN	Other Banks	Financial institutions	Other Companies
Chandra M. Hamzah	President Commissioner/ Independent	Nil	Nil	Nil	Nil
Iqbal Latanro	Vice President Commissioner / Independent	Nil	Nil	Nil	Nil
Armand B. Arief	Independent Commissioner	Nil	Nil	Nil	Nil
Sentot A. Sentausa	Independent Commissioner	Nil	Nil	Nil	Nil
Adi Sulistyowati*	Independent Commissioner	Nil	Nil	Nil	Nil
Bambang Widjanarko*	Independent Commissioner	Nil	Nil	Nil	Nil
Andin Hadiyanto	Commissioner	Nil	Nil	Nil	Nil
Herry Trisaputra Zuna	Commissioner	Nil	Nil	Nil	Nil
Himawan Arief Sugoto	Commissioner	Nil	Nil	Nil	Nil
Mohamad Yusuf Permana**	Commissioner	Nil	Nil	Nil	Nil

* Appointed during the Annual General Meeting of Shareholders (AGMS) on March 6, 2024, and passed the fit and proper assessment on October 7, 2024
** Term ended on March 4, 2024, as confirmed in the AGMS on March 6, 2024

Share Ownership Transactions of the Board of Directors and the Board of Commissi

Share ownership transactions for the Board of Directors and the Board of Commissioners, including submission of reports to Regulators referring to the OJK Regulation Number 11/POJK.04/2017 Concerning Ownership Reports or Any Changes in Public Company Share Ownership, Decree of the Directors of PT Bursa Efek Indonesia Number Kep-00066 /BEI/09-2022 Regarding Amendments to Regulation Number I-E concerning Obligations for Submitting Information, and the Company's Articles of Association. Members of the Board of Directors and Board of Commissioners are required to submit information to the Company through the Corporate Secretary regarding ownership and any changes in ownership of the Company's shares no later than 3 (three) working days and to submit to the OJK regarding ownership and any changes in ownership of the shares of the Public Company (dhi.BBTN) both directly and indirectly. The report must be submitted no later than 10 (ten) days since the ownership or change in ownership of Public Company shares.

The share ownership transactions of the Board of Directors and Board of Commissioners during 2024 are as follows..

No.	Name	Kategori	Tanggal Transaksi	Number of Shares and Percentage of Share Ownership		Number of Shares Purchased	Purchase Price per Share	Ownership status	Transaction Purpose
				Before transaction	After transaction				
1.	Nixon L.P. Napitupulu	Board of Directors	24 April 2024	4.250.500	5.399.000	1.148.500	Rp1.382,-	Direct	Fulfillment of OJK Regulation Number 45/POJK.03/2015 dated December 23, 2015 concerning Implementation of Governance in the Provision of Remuneration for Commercial Banks

No.	Name	Kategori	Tanggal Transaksi	Number of Shares and Percentage of Share Ownership		Number of Shares Purchased	Purchase Price per Share	Ownership status	Transaction Purpose
				Before transaction	After transaction				
2.	Oni Febriarto Rahardjo	Board of Directors	24 April 2024	308.000	1.149.100	841.100	Rp1.382,-	Direct	Pemenuhan Peraturan Otoritas Jasa Keuangan Nomor 45/ POJK.03/2015 tanggal 23 Desember 2015 tentang Penerapan Tata Kelola Dalam Pemberian Remunerasi Bagi Bank Umum
3.	Andi Nirwoto	Board of Directors	24 April 2024	1.822.161	2.818.561	996.400	Rp1.382,-	Direct	Pemenuhan Peraturan Otoritas Jasa Keuangan Nomor 45/ POJK.03/2015 tanggal 23 Desember 2015 tentang Penerapan Tata Kelola Dalam Pemberian Remunerasi Bagi Bank Umum
4.	Elisabeth Novie Riswanti	Board of Directors	24 April 2024	1.733.200	2.729.600	996.400	Rp1.382,-	Direct	Pemenuhan Peraturan Otoritas Jasa Keuangan Nomor 45/ POJK.03/2015 tanggal 23 Desember 2015 tentang Penerapan Tata Kelola Dalam Pemberian Remunerasi Bagi Bank Umum
5.	Jasmin	Board of Directors	24 April 2024	2.848.030	3.844.430	996.400	Rp1.382,-	Direct	Pemenuhan Peraturan Otoritas Jasa Keuangan Nomor 45/ POJK.03/2015 tanggal 23 Desember 2015 tentang Penerapan Tata Kelola Dalam Pemberian Remunerasi Bagi Bank Umum
6.	Setiyo Wibowo	Board of Directors	24 April 2024	1.892.700	2.889.100	996.400	Rp1.382,-	Direct	Pemenuhan Peraturan Otoritas Jasa Keuangan Nomor 45/ POJK.03/2015 tanggal 23 Desember 2015 tentang Penerapan Tata Kelola Dalam Pemberian Remunerasi Bagi Bank Umum

No.	Name	Kategori	Tanggal Transaksi	Number of Shares and Percentage of Share Ownership		Number of Shares Purchased	Purchase Price per Share	Ownership status	Transaction Purpose
				Before transaction	After transaction				
7.	Hirwandi Gafar	Board of Directors	24 April 2024	1.763.314	2.759.714	996.400	Rp1.382,-	Direct	Fulfillment of OJK Regulation Number 45/POJK.03/2015 dated December 23, 2015 concerning Implementation of Governance in the Provision of Remuneration for Commercial Banks
8.	Nofry Rony Poetra	Board of Directors	24 April 2024	2.531.022	3.527.422	996.400	Rp1.382,-	Direct	Fulfillment of OJK Regulation Number 45/POJK.03/2015 dated December 23, 2015 concerning Implementation of Governance in the Provision of Remuneration for Commercial Banks
9.	Eko Waluyo	Board of Directors	24 April 2024	1.871.964	2.868.364	996.400	Rp1.382,-	Direct	Fulfillment of OJK Regulation Number 45/POJK.03/2015 dated December 23, 2015 concerning Implementation of Governance in the Provision of Remuneration for Commercial Banks
10.	Hakim Putratama	Board of Directors	24 April 2024	0	794.400	794.400	Rp1.382,-	Direct	Fulfillment of OJK Regulation Number 45/POJK.03/2015 dated December 23, 2015 concerning Implementation of Governance in the Provision of Remuneration for Commercial Banks

No.	Name	Kategori	Tanggal Transaksi	Number of Shares and Percentage of Share Ownership		Number of Shares Purchased	Purchase Price per Share	Ownership status	Transaction Purpose
				Before transaction	After transaction				
11.	Himawan Arief Sugoto	Board of Commissioners	24 April 2024	404.600	879.300	474.700	Rp1.382,-	Direct	Fulfillment of OJK Regulation Number 45/POJK.03/2015 dated December 23, 2015 concerning Implementation of Governance in the Provision of Remuneration for Commercial Banks
12.	Herry Trisaputra Zuna	Board of Commissioners	24 April 2024	404.600	879.300	474.700	Rp1.382,-	Direct	Fulfillment of OJK Regulation Number 45/POJK.03/2015 dated December 23, 2015 concerning Implementation of Governance in the Provision of Remuneration for Commercial Banks

Organs and Committees Under the Board of Commissioners

Secretary of the Board of Commissioners

The secretary of the Board of Commissioners of the Company is appointed by the Board of Commissioners and is responsible to the Board of Commissioners of the Company. The responsibilities of the Secretary of the Board of Commissioners include organizing the administration, assisting the Board of Commissioners in performing the oversight function of the effective performance of the Company, and ensuring that the Board of Commissioners has implemented the principles of GCG properly.

Duties and Responsibilities of the Board of Commissioners Secretary

The duties and responsibilities as Secretary of the Board of Commissioners following the regulation of the minister of SOEs are to conduct activities to assist the Board of Commissioners in carrying out their duties in the form of:

1. Preparing for the meeting, including the briefing sheet of the Board of Commissioners;
2. Creating the Minutes of Meetings of the Board of Commissioners following the provisions of the Articles of Association;
3. Administering the documents of the Board of Commissioner, both incoming letters and exit letters, Minutes of Meetings, and other documents;
4. Drafting work plan and budget (RKAP) of the Board of Commissioners.
5. Drafting the reports of the Board of Commissioners.
6. Carrying out other duties of the Board of Commissioners.

Profile of Secretary of The Board of Commissioners

The brief profile of the Secretary of the Board of Commissioners of the Company is as follows.



Fahrudin
Secretary of the Board of Commissioners

Indonesian Citizen,
Temanggung, November 19, 1983
(41 years ols as of December 2024),
domiciled Central Jakarta City.

Educational Background
- Bachelor of Accounting, University of Indonesia (2009)
- Master of Accounting, Gadjah Mada University (2012)

Work Experience
- Middle State Enterprise Governance at Assistant Deputy for TJSL - Ministry of SOEs (November 2023—present)
- Junior State Enterprise Governance at Assistant Deputy for TJSL - Ministry of SOEs (November 2021—October 2023)
- Secretary of the Board of Commissioners of PT Bank Tabungan Negara (Persero) Tbk (October 2022—present)
- Secretary of the Supervisory Board of Perum Bulog (November 2019—September 2022)
- Secretary of the Board of Commissioners of PT Bank Negara Indonesia (Persero) Tbk (July 2017—October 2019)
- Secretary of the Board of Commissioners of PT Pembangunan Perumahan (Persero) Tbk (April 2016—July 2017).

Legal Basis for Appointment
Board of Commissioners Letters No. 06/KOM/BTN/2022 dated September 28, 2022.

Period of Service
November 01, 2022 – October 31, 2025 (Period I).

Jabatan Rangkap
Management of Middle State Companies at the Assistant Deputy for TJSL, Ministry of BUMN.

Competency Development of the Board of Commissioner Secretary

Training and Competency Development Types/Materials	Time and place Implementation	Organizer
BTN Leadership Forum 2 - 2024	May 2, 2024 s.d. May 4, 2024 in Bali	McKinsey & PwC
Innovation and Entrepreneurship: Cutting-edge Insights from China	November 4, 2024 s.d. November 8, 2024 in China	AGLP
Boardroom Bound: Accelerating Growth to Embrace The Future BTN	October 25, 2024 in Batam	LPPI

Implementation of Duties of the Board of Commissioners Secretary

The Secretary of the Board of Commissioners shall carry out the following duties:
1. To carry out administrative activities within the secretariat of the Board of Commissioners.
2. To Organize Board of Commissioners Meetings and meetings between the Board of Commissioners and Shareholders, Directors, and other stakeholders, including preparing meeting invitations, preparing meeting materials, and preparing minutes of meetings of the Board of Commissioners, including minutes of meetings between the Board of Commissioners and the Board of Directors.
3. To deliver the original minutes of the Board of Commissioners meeting to the Company.
4. To draft the Work Plan and the Board of Commissioners' Budget (RKAP).
5. To prepare the Board of Commissioners reports.
6. To ensure that the Board of Commissioners complies with statutory regulations and applies the principles of good corporate governance.
7. To provide the information required by the Board of Commissioners periodically and/or at any time it is requested.

8. To coordinate Committee members (if needed) to facilitate the duty of the Board of Commissioners.
9. Acting as a liaison officer for the Board of Commissioners with other parties.
10. Collecting data, reports and/or information relevant to the implementation of the duties of the Board of Commissioners.
11. To perform other duties assigned by the Board of Commissioners regarding the duties and the functions of the Board of Commissioners.

Audit Committee

The Company establishes the Audit Committee in order to support the Board of Commissioners in carrying out the supervisory functions, including monitoring and evaluating the implementation of the internal control system, assessing the implementations of activities and the audit results carried out by the Internal Audit Unit and external auditors, reviewing financial information to be issued by the Company, and reviewing the compliance with the provisions related to the Company's activities.

Legal Basis for Establishing the Audit Committee

DasThe establishment of the Audit Committee is based on the following regulations:

1. Regulation of the Minister of State-Owned Enterprises Number PER-2/MBU/03/2023 concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises;
2. Regulation of the Minister of State-Owned Enterprises Number PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises;
3. Decree of the Deputy for Finance and Risk Management of the Ministry of State-Owned Enterprises of the Republic of Indonesia No. SK-5/DKU.MBU/11/2024 dated November 11, 2024, concerning Technical Guidelines for Internal Control Over Financial Reporting (ICFR) of State-Owned Enterprises;
4. OJK Regulation No. 33/ POJK.04/2014 dated December 8, 2014, concerning the Board of Commissioners of Issuers of Public Companies;
5. OJK Regulation No. 55/ POJK.04/2015 dated December 23, 2015, concerning the Establishment and the Guidelines for the work of Implementation of the Audit Committee;
6. OJK Regulation No. 01/ POJK.03/2019 dated January 28, 2019, concerning the implementation of the Internal Audit Function in Commercial Banks;
7. OJK Regulation Number 9 of 2023 concerning the Use of Public Accounting Services and Public Accounting Firms in Financial Services Activities;
8. Financial Services Authority Regulation Number 12 of 2023 dated July 12, 2023, concerning Sharia Business Units;
9. OJK Regulation Number 17 of 2023 concerning Implementation of Governance for Commercial Banks;
10. Financial Services Authority Regulation Number 2 of 2024 dated February 15, 2024, concerning the Implementation of Sharia Governance for Commercial Banks and Sharia Business Units;
11. Financial Services Authority Regulation Number 12 of 2024 dated July 23, 2024, concerning the Implementation of Anti-fraud Strategies for Financial Service Institutions;
12. Financial Service Authority Regulation Number 15 of 2024 dated October 2, 2024, concerning the Integrity of Bank Financial Reporting;
13. OJK Circular Letter Number 35/SEOJK.03/2017 concerning Standard Guidelines for Internal Control Systems for Commercial Banks;
14. Bank Indonesia Circular Letter No. 12/13/DPbS//2010 regarding the Implementation of Good Corporate Governance for Sharia Commercial Banks and Sharia Business Units;
15. Articles of Association of PT Bank Tabungan Negara *Persero) Tbk;
16. Board of Commissioners Decree Number 18/KOM/BTN/2024 dated December 18, 2024, regarding the Guidelines and Rules of Procedure for the Board of Commissioners of PT Bank Tabungan Negara (Persero) Tbk;

Duties and Responsibilities of the Audit Committee

In carrying out its functions, the Audit Committee shall perform the following duties and responsibilities::

1. Internal and External Audit
   a. Assisting the Board of Commissioners in ensuring and reviewing the effectiveness of the internal control system, based on information obtained from the Internal Audit Unit (SKAI) at least once a year;
   b. Providing recommendations to the Board of Commissioners regarding: appointment and removal of the Head of the Internal Audit Work Unit, and provision of annual remuneration for the Internal Audit Work Unit as a whole as well as performance awards;
   c. Providing recommendations to the Board of Commissioners regarding the preparation of the audit plan, scope, and budget for the Internal Audit Unit;
   d. Monitoring and evaluating the audit planning, audit implementation, and follow-up on the results of internal and external audits to assess the adequacy of internal control;

e. Reviewing and evaluating internal auditor reports periodically, recommending and ensuring that the Board of Directors takes corrective action to overcome control weaknesses, fraud, compliance issues with policies and laws and regulations or other problems identified and reported by the Internal Audit Work Unit;
f. Carrying out monitoring and evaluation used to provide recommendations kepada Dewan Komisaris paling sedikit terhadap:
   1) Implementation of the duties of the internal audit work unit.
   2) Implementation of follow-up actions by the Board of Directors regarding the findings of the Company's internal audit work unit, external auditors, results of supervision by the Financial Services Authority, and/or results of supervision by other authorities and institutions.
g. Monitoring, reviewing, and assessing the effectiveness of the implementation of Internal and External Audit, including the management of the Whistleblowing System (WBS);
h. Ensuring the Internal Audit Unit communicates with the Board of Directors, Board of Commissioners, Sharia Supervisory Board, External Auditors, Bank Indonesia, and the Financial Services Authority (OJK);
i. Evaluating the performance of the Internal Audit Unit;
j. Ensuring the objectivity, independence, and integrity of Internal and External Auditors in performing their duties;
k. Providing recommendations to the Board of Commissioners regarding the issuance of the Internal Audit Charter;
l. Providing recommendations to the Board of Commissioners on the appointment of an independent external quality controller to review the performance of the Internal Audit Unit;

2. Financial Reporting
   a. Conducting monitoring and evaluation of:
      1) Implementation of internal control policies and procedures in the Company's financial reporting process (Internal Control over Financial Reporting or ICOFR);
      2) The conformity of Financial Statements with financial accounting standards and regulations set by the Financial Services Authority (OJK) regarding the recording of financial transactions;

      The results of the monitoring and evaluation are used to provide recommendations to the Board of Commissioners to ensure the integrity of the financial reporting process in the Company.
   b. Carrying out the procurement process for prospective public accounting firms in accordance with the provisions for procurement of the Company goods and services, and if necessary, request assistance from the Board of Directors in the procurement process.
   c. Provide recommendations to the Board of Commissioners regarding the appointment and/or replacement of Public Accountants/Public Accounting Firms based on independence, scope of assignment, and service fees;
   d. Evaluating the implementation of audit services for annual financial information carried out by Accountants/ Public Accountants/Public Accounting Firms.
   e. Monitoring and reviewing the financial reporting process audited by the External Auditor;
   f. Ensuring the credibility and objectivity of the Company's financial statements to be issued to external parties and regulatory bodies, including addressing complaints and/or notes of irregularities in the reports during the Audit Committee's review period;
   g. reviewing the financial information to be released by the Company to the public and/or regulatory authorities, including financial statements, projections, and other financial-related reports, as well as reviewing the monthly financial performance review;
   h. Providing an independent opinion in the event of a difference of opinion between management and the Accountant regarding the services provided;
   i. Reviewing complaints related to the Company's accounting and financial reporting processes.

3. Others
   a. Providing evaluations/recommendations to the Board of Commissioners regarding the appointment, reappointment and removal of Rating Companies to carry out Sound Level Assessments (Company Ratings) based on independence, scope of assignment and service fees.
   b. Providing recommendations regarding improvements to the management control system and its implementation.
   c. Ensuring that there are satisfactory evaluation procedures for all information issued by the Company.
   d. Identifying matters that require the attention of the Board of Commissioners as well as other duties of the Board of Commissioners.
   e. Carrying out other authorities, duties and responsibilities related to its functions.
   f. Reviewing compliance with laws and regulations relating to Company activities.
   g. Reviewing and providing advice to the Board of Commissioners regarding potential conflicts of interest of the Company.

h. Maintaining the confidentiality of documents, data and Company information; and

i. Carrying out other duties of the Board of Commissioners in accordance with the Audit Committee's field of duties.

Audit Committee Charter

The Audit Committee has a Charter and Code of Conduct based on the Decree of the Board of Commissioners No. 19/KOM/BTN/2024, regarding the Charter and Code of Conduct of the Audit Committee of PT Bank Tabungan Negara (Persero) Tbk. The Guidelines and Procedures for the Work or the Audit Committee Charter serve as a reference for the Audit Committee in carrying out its duties effectively. The Audit Committee Charter is created with the aim of being the basis and guidance for the Audit Committee in carrying out its duties, including monitoring and evaluating the implementation of the internal control system, assessing the implementation of audit results carried out by the Internal Audit Unit and external Auditors, reviewing financial information to be issued by the Company, and reviewing the compliance with regulations relating to the Company's activities.

The contents of the Audit Committee Guidelines and Work Rules (Charter) include, among others:

Chapter I	General Provisions, the Purpose of Establishing the Audit Committee Charter	Article 1	General Provisions
		Article 2	Definition, Purpose, and Objectives of the Guidelines and Procedures for the Work of the Audit Committee.
Chapter II	Duties, Responsibilities, and Authorities of the Audit Committee	Article 3	Audit Committee Responsibilities and Authorities
		Article 4	Audit Committee Obligations
Chapter III	Working Procedures, Information Access and Confidentiality, Composition, Structure, and Membership Requirements	Article 5	Procedures and Working Methods of the Audit
		Committee	Akses dan Kerahasiaan Informasi
		Article 6	Access to and Confidentiality of Information
		Article 7	Structure, Appointment, and Termination of the Audit Committee
Chapter IV	Meeting, Reporting, Work Plan, Budget, Income, and Audit Committee Service Period	Article 8	Membership Requirements of the Audit Committee
		Article 9	Audit Committee Meetings
		Article 10	Audit Committee Reporting
		Article 11	Work Plan and Budget of the Audit Committee
		Article 12	Compensation for Audit Committee Members
Chapter V	Education, Support Personnel, and Complaints Handling	Article 13	Term of Office
		Article 14	Enhancement of Professionalism for Audit Committee Members and the Use of Support Staff
Chapter VI	Evaluation and closing	Article 15	Handling Complaints or Reports of Alleged Violations Related to Financial Reports
		Article 16	Evaluation

Authorities of the Audit Committee

The Audit Committee is granted authority by the Board of Commissioners to:

1. Access all relevant information, including documents, and data information about employees, funds, assets, and resources of the Company that are required in relation to the duties and functions of the Audit Committee.
2. Communicate directly with employees including the Board of Directors and those who carry out the internal audit, risk management, and accountants regarding the responsibilities of the Audit Committee.
3. Involve independent parties outside the members of the Audit Committee who are needed to assist them in carrying out their duties (if needed).
4. Do other authorities assigned by the Board of Commissioners.

Term of Office of the Audit Committee

The term of office for the Audit Committee members who are not members of the Board of Commissioners is no more than (3) three years and may be extended for 1 (one) or 2 (two) more years of service, without prejudice to the right of the Board of Commissioners to dismiss them at any time..

Structure, Membership, and Expertise of the Audit Committee

The Audit Committee is established by the Board of Commissioners, consisting of a chairperson and members, all of whom must be entirely independent. The committee comprises a minimum of 3 (three) members, including Independent Commissioners from both within and outside the Company. The membership of the Audit Committee must include at least 1 (one) Independent Commissioner who also serves as the Chair, 1 (one) Independent Party with expertise in finance/accounting, and 1 (one) Independent Party with expertise in legal/ banking matters. This composition ensures a diverse and qualified team overseeing financial governance and compliance matters. .

The chairman and members of the Audit Committee are appointed and dismissed by the Board of Commissioners. The Chairman of the Audit Committee is an Independent Commissioner. Audit Committee members may come from members of the Board of Commissioners or outside the Company.

The structure, membership, and expertise of the Audit Committee are listed in the table below..

Table of Structure, Membership, and Expertise of the Audit Committee

Name	Position	Information	Expertise	Period	Term of Office		Basis of Appointment
					Starting	End	
Iqbal Latanro	Chairperson concurrently serving as a member	Vice President Commissioner/ Independent	Banking, Compliance, Risk Management, and People Management	First	March 10, 2021	AGM 2026	Board of Commissioner's Decission Letter Number 01/KOM/BTN/2021 dated March 24,2021
Sentot A. Sentausa	Member	Independent Commissioner	Banking, Compliance, Risk Management, and Business Administration	First	March 2, 2022	AGM 2027	Board of Commissioners Decree Number 03/KOM/ BTN/2022 dated March 17, 2022
Bambang Widjanarko	Member[1]	Independent Commissioner[2]	Accounting, Audit, Compliance, Banking, Islamic Banking, and Business Management	First	March 13, 2024	2029 AGM	Board of Commissioners Decision Number 06/ KOM/BTN/2024 dated March 13, 2024
Andin Hadiyanto	Member[2]	Commissioner	Banking, Compliance, Risk Management, and Business Administration	Second	March 6, 2024	October 15, 2024	Board of Commissioners Decision Number 02/ KOM/BTN/2024 dated March 6, 2024
Endang A. Suprijatna	Member[3]	Independent Party	Audit, Banking, Islamic Banking, and Accounting	First	March 13, 2023	March 12, 2026	Board of Directors Decisions Number 167/ DIR/2023 Dated March 8, 2023
Indra Jaka Aprilyanta	Member[4]	Independent Party	Audit, Investigation, Banking, Accounting	First	November 19, 2024	November 18, 2027	Board of Directors Decision Number 1066/DIR/20242 dated November 19,2024

Name	Position	Information	Expertise	Period	Term of Office		Basis of Appointment
					Starting	End	
Peter Eko Budi Darwito	Member[5]	Independent Party	Audit, Banking, Islamic Banking, Finance	Second	November 19, 2022	November 18, 2024	Board of Directors Decision Number 1088/DIR/2022 dated November 9, 2022

[1]) Appointed as a member of the audit Committee on March 13, 2024
[2]) Effective based on the Fit and Proper Assessment Decision by OJK on October 7, 2024
[3]) Term of office ended on October 15, 2024
[4]) Appointed as a member of the audit Committee on November 19, 2024
[5]) Term of office ended on November 18, 2024

Profile of the Audit Committee

The profile of the Audit Committee as of December 31, 2024, is as follows.

Iqbal Latanro
Chairma of the Audit Committee/ Vice President Commissioner/ Independent

His profile can be seen in the Board of Commissioners section. His term as Chairman and member of the Audit Committee is from March 10, 2021, to the Annual General Meeting of Shareholders (AGMS) in 2026 (First Period)

Sentot A. Sentausa
Member of the Audit Committee/ Independent Commissioner

His profile can be seen in the Board of Commissioners section.

His term as a member of the Audit Committee is from March 2, 2022, to the Annual General Meeting of Shareholders (AGMS) in 2027 (First Period)

Bambang Widjanarko
Member of the Audit Committee/ Independent Commissioner

Profil dapat dilihat pada bagian Profil Dewan Komisaris.

Periode menjabat beliau sebagai anggota Komite Audit dari 13 Maret 2024 s.d. RUPST Tahun 2029 (Periode Pertama)



Endang A. Suprijatna

Anggota Komite Audit/
Pihak Independen

Indonesia citizen,
Sumedang, January 17, 1967
(57 years old as of December 2024).
domiciled Bekasi, West Java.

Educational Background

Bachelor of Economics majoring in Accounting, Padjajaran University (1991)

Certification

- Certification in Audit Committee Practices (CACP) from IKAI.
- Chartered Accountant (CA Indonesia) No. 11.D9268.
- Registered Accountant Certification from the Ministry of Finance of the Republic of Indonesia.
- Banking Risk Management Certification Level 6 from the Banking Professional Certification Institute (LSPP).
- Qualified Internal Auditor from the Qualified Internal Auditor Certification Board

Work experience

- Regional Business Control Head (Head of Internal Audit) PT Bank Mandiri (Persero) Tbk Region VI West Java, Region VIII East Java and Region V South Jakarta including Bogor (2015-January 2023)
- Consumer Loans Business Center Manager Makassar, Palu, Kendari, Ambon, Samarinda & Bontang Region, Lampung Region (November 2009-2014)
- Small, Micro & Consumer Credit Audit Team Leader PT Bank Mandiri (Persero) Tbk (2006 – October 2009)
- Team Leader Audit Distribution (Branch) PT Bank Mandiri (Persero) Tbk (2005)
- Wholesale Banking Credit Audit Team Leader PT Bank Mandiri (Persero) Tbk (August 2001 - 2004)
- Senior Auditor General Audit PT Bank Mandiri (Persero) Tbk (July 1999-2001)
- Auditor of PT Bank Export Import Indonesia (Persero) (December 1993- 1999)

Basis of Appointment

Decree of the Board of Directors of PT Bank Tabungan Negara (Persero) Tbk. Number 167/DIR/2023 dated March 8, 2023 concerning the Determination of Mr. Endang A. Suprijatna as Member of the Audit Committee.

Period of Office

First term of office March 13, 2023 to March 12, 2026

Concurrent Position

No concurrent position



Indra Jaka Aprilyanta

Member of the Audit Committee/ Independent Party

Indonesia citizen,
Yogyakarta, April 16, 1968
56 years old as of December 2024,
domiciled Bogor, Jawa Barat.

Educational Background

Bachelor of Economics majoring in Accounting, Padjajaran University (1991)

Sertifikasi

- Certification in Audit Committee Practices No. Certificate 11013/CACP/X/2024 from the Indonesian Audit Committee Association (IKAI), 2024.
- Certified Forensic Auditor (CfrA) No. Reg. AUD. 082.0000239.2022 from the Forensic Auditor Professional Certification Institute 2022.
- Computer Hacking Forensic Investigator , Certification Number ECC4210578693 from EC-Council tahun 2022.
- Risk Management Certification Level 3, KEU.030 1754412, from the Banking Professional Certification Institute (LSPP), 2021.
- Chartered Accountant (CA Indonesia) No. 11.D10199 from IAI 2017.
- National Register of Accountants No. RNA 18068 from the Ministry of Finance of the Republic of Indonesia, Secretariat General, Center for Financial Profession Development, 2017.
- Certified Fraud Examiner dari Association of Certified Fraud Examiners (ACFE) 2012.
- Qualified Internal Auditor (QIA) No. Reg. 0587/QIA/99 Qualified Internal Auditor, Certification Board, 1999.
- National Register for Accountants No. D-10199 from the Ministry of Finance of the Republic of Indonesia, 1996.

Work Experience

- Investigator Head - Senior Investigator, Internal Audit, PT Bank Mandiri (Persero) Tbk (March 2020 to April 2024)
- Specialist – Investigation, Internal Audit, PT Bank Mandiri (Persero) Tbk (September 2016 s.d. March 2020)
- Senior Credit Risk Manager - Regional Risk Management III Jakarta Kota, PT Bank Mandiri (Persero) Tbk (November 2013 – September 2016)
- Credit Risk Manager Authority (Detasering) - Regional Risk Management III Jakarta Kota - Commercial Risk, PT Bank Mandiri (Persero) Tbk (June 2013 – November 2013)
- Lead Auditor – Wholesale Banking Audit, Internal Audit, PT Bank Mandiri (Persero) Tbk (Desember 2010 – May 2013)
- Team Leader - Commercial Banking Audit, Internal Audit, PT Bank Mandiri (Persero) Tbk (Desember 2008 – November 2010)
- Team Leader - Corporate Center Audit, Internal Audit, PT Bank Mandiri (Persero) Tbk (May 2006 - November 2008)
- Team Leader - Distribution Audit, Internal Audit, PT Bank Mandiri (Persero) Tbk (January 2003 - April 2006)
- Senior Auditor - Distribution Audit, Internal Audit, PT Bank Mandiri (Persero) Tbk *(August 1999 - January 2003)*
- *Auditor, Supervision Bureau, PT Bank Ekspor Impor Indonesia (Persero) (Desember 1993 - July 1999)*

Legal Basis for Appointment

Boards of Directors Decree PT Bank Tabungan Negara (Persero) Tbk, Number 1066/DIR/2024, dated November 19, 2024, regarding the appointment of Mr. Indra Jaka Aprilyanta as a member of the Audit Committee.

Period of Office

First term of office: November 19, 2024 – November 18, 2027.

Concurrent Position

Does not hold any concurrent positions.

The Independency of the Audit Committee

Table of the Audit Committee Independency

Independence Aspect	Iqbal Latanro	Sentot A. Sentausa	Bambang Widjanarko	Andin Hadiyanto	Endang A. Suprijatna	Indra Jaka Aprilyanta	Peter Eko Budi Darwito
Having no financial relationship with the members of the Board of Commissioners and the Board of Directors	✓	✓	✓	✓	✓	✓	✓
Having no managerial relationship at the company, its subsidiaries, and its affiliates	✓	✓	✓	✓	✓	✓	✓
Having no share ownership relationship in the Company	✓	✓	✓	✓	✓	✓	✓
Having no familial relationship with the Board of Commissioners, Board of Directors, and/or fellow members of the Audit Committee	✓	✓	✓	✓	✓	✓	✓
Not serving as a member of a political party management or a government official	✓	✓	✓	✓	✓	✓	✓

Training and/or Competency Development of The Audit Committee In 2024

Name	Position	Type of Training and Competency Development / Training Material	Time and place	Organizer
Iqbal Latanro	Chairperson and concurrent member	Training and/or Competency Development can be found in the Training and/or Competency Development section of the Board of Commissioners.		
Sentot A. Sentausa	Member	Training and/or Competency Development can be found in the Training and/or Competency Development section of the Board of Commissioners.		
Bambang Widjanarko	Member	Training and/or Competency Development can be found in the Training and/or Competency Development section of the Board of Commissioners.		
Andin Hadiyanto	Member[1]	Training and/or Competency Development can be found in the Training and/or Competency Development section of the Board of Commissioners.		
Endang A. Suprijatna	Member	Executive Risk Management Program - Level 5	January 27, 2024 Bogor	LPPI
		SMR Level 6 Briefing	May 6, 2024 Jakarta	LPPI
		Risk Management Certification Level 5	March 14, 2024 Jakarta	LSPP
		Risk Management Certification Level 6	May 13, 2024 Jakarta	LSPP
		Strategy to Accelerate Islamic Finance Market Share	March 21, 2024 Virtual Classroom	OJK Institute
		Opportunities and Challenges in Personal Data Protection in Transactions in the Digital Era	May 30, 2024 Virtual Classroom	OJK Institute
		Opportunities and Challenges in Open Finance Protection in Indonesia	April 25, 2024 Virtual Classroom	OJK Institute

Name	Position	Type of Training and Competency Development / Training Material	Time and place	Organizer
		Chartered Accountant Indonesia Certification	June 5, 2024 Jakarta	IKAI
		Registered Accountant Certification	June 25, 2024 Jakarta	Ministry of Finance
		The Role of Digital Technology in Enhancing Accounting Practices	July 11, 2024 Virtual Classroom	OJK Institute
		The Strategic Role of the Audit Committee in Ensuring Cybersecurity	August 1, 2024 Virtual Classroom	IKAI
		ACIIA Regional Conference: Purposeful Impact	August 28-29, 2024 Bali	IIA Indonesia
		Boardroom Bound : Accelerating Growth to Embrace The Future BTN	October 25, 2024 Batam	LPPI
		SNIA-Cultural Transformation: Integrating ESG, CYbersecurity, and Innovative Risk management	December 4-5,	YPIA
Indra Jaka Aprilyanta	Member	Training Certification in Audit Committee Practices (CACP)	2024 Bali	IKAI
Peter Eko Budi Darwito	Member[2]	Dissemination of First-Year HAU Implementation Study in LAI on Issuers' Financial Statements for Fiscal Year 2022	January 5, 2024 Virtual Classroom	IAPI DAN OJK
		Executive Risk Management Program - Level 5	January 27, 2024 Bogor	LPPI
		Strategy to Accelerate Islamic Finance Market Share	March 21, 2024 Virtual Classroom	OJK Institute
		Artifiicial Intelligence Changes the Face of Financial Sector	March 7, 2024 Virtual Classroom	OJK Institute
		Risk Management Certification Level 6 Briefing	May 6, 2024 Jakarta	LPPI
		Risk Management Certification Level 5	March 4, 2024 Jakarta	LSPP
		Risk Management Certification Level 6	May 13, 2024 Jakarta	LSPP
		Financial Accounting Certification - Pathway to CA Indonesia	May 16-17, 2024 Jakarta	IAI
		The Role of Innovative Credit Scoring (ICS) in Improving Funding Access	June 27, 2024 Virtual Classroom	OJK Institute
		Navigating The Half-Year: Roadmap to Success	June 20, 2024 Virtual Classroom	OJK Institute
		Digital Marketing Strategy in the Digital Era: Effective Tactics and Steps to Maximize Profits	June 5, 2024 Virtual Classroom	OJK Institute
		Opportunities and Challenges in Personal Data Protection in Transactions in the Digital Era	May 30, 2024 Virtual Classroom	OJK Institute
		How to Prevent Greenwashing in Sustainable Finance	May 16, 2024 Virtual Classroom	OJK Institute

Name	Position	Type of Training and Competency Development / Training Material	Time and place	Organizer
		How to Prevent Accounting Fraud in Financial Sector	May 2, 2024 Virtual Classroom	OJK Institute
		The Strategic Role of the Audit Committee in Ensuring Cybersecurity	August 1, 2024 Virtual Classroom	IKAI
		Market Conduct Implementation Strategy: Building Trust and Enhancing the Financial Services Industry's Performance	August 8, 2024 Virtual Classroom	OJK Institute
		Driving Corporate Performance through Artificial Intelligence	July 25, 2024 Virtual Classroom	OJK Institute
		Expansive Leadership Program	September 5-6, 2024 Bali	Mediatama Sinergi Emas
		Boardroom Bound : Accelerating Growth to Embrace The Future BTN	October 25, 2024 Batam	LPPI

[1] Term of office ends on October 15, 2024
[2] Term of office ends on November 18, 2024

The Audit Committee's Meeting

1. The Audit Committee holds meetings at least as frequently as the minimum number of meetings required by the Board of Commissioners, as stipulated in the Articles of Association and/or at least once a month.
2. The Audit Committee meeting can be conducted if attended by the majority of the Audit Committee members or at least 51% (fifty-one percent) of the total members
3. If there is a conflict of interest between the audit members about the discussion object, the committee has to declare that there is a conflict of interest and he/she does not have the right to vote in the decision making.
4. The meeting is chaired by the Head of Audit Committee or by the most senior member when the Head of Audit Committee is unable to attend.
5. Meeting decisions are taken based on consensus deliberation.
6. If consensus deliberation is not reached, the decisions are taken based on the majority vote.
7. Every Audit Committee meeting must be recorded in minutes, signed by all attending members, and properly documented in accordance with applicable laws and regulations.
8. The minutes as mentioned above shall be submitted in writing by the Audit Committee to the Board of Commissioners.
9. Dissenting opinion that occurs in the Audit Committee meeting must be included in the Minutes of Meeting clearly, along with the reasons for disagreements.
10. If an Audit Committee member is unable to attend the meeting physically, they may participate through face-to-face virtual meetings using information technology.
11. The attendance of the Audit Committee members is reported in the quarterly report and the annual report of the Audit Committee.

THE AUDIT COMMITTEE MEETING AGENDA

Throughout 2024, the date, meeting agenda, and Audit Committee meeting participants were recorded as follows..

No.	Date	Meeting Agenda	Participant
1.	January 8, 2024	Audit Committee Recommendations for the Appointment of Public Accounting Firm (KAP) for Fiscal Year 2024	• Iqbal Latanro • Sentot A. Sentausa • Andin Hadiyanto • Endang A. Suprijatna • Peter Eko Budi Darwito
2.	January 22, 2024	Annual Audit Plan for 2024	• Iqbal Latanro • Sentot A. Sentausa • Endang A. Suprijatna • Peter Eko Budi Darwito
3.	February 1, 2024	Closing Meeting of the Financial Statement Audit as of December 31, 2023	• Iqbal Latanro • Sentot A. Sentausa • Andin Hadiyanto • Peter Eko Budi Darwito
4.	February 5, 2024	Audit Realization, Monitoring of Follow-Ups, and Anti-Fraud Strategy up to Q4 2023	• Iqbal Latanro • Sentot A. Sentausa • Andin Hadiyanto • Peter Eko Budi Darwito
5.	February 06, 2024	Review of Draft Published Financial Statements as of December 31, 2023 (Audited)	• Iqbal Latanro • Sentot A. Sentausa • Andin Hadiyanto • Peter Eko Budi Darwito
6.	February 26, 2024	Recommendation for Approval of the 2024 Annual Audit Plan and Quarterly Audit Committee Report	• Iqbal Latanro • Sentot A. Sentausa • Andin Hadiyanto • Endang A. Suprijatna • Peter Eko Budi Darwito
7.	March 13, 2024	Evaluation of KAP Services for the Financial Statement Audit of Fiscal Year 2023	• Iqbal Latanro • Sentot A. Sentausa • Andin Hadiyanto • Endang A. Suprijatna • Peter Eko Budi Darwito
8.	March 20, 2024	Discussion on the Management Letter as of December 31, 2023	• Iqbal Latanro • Sentot A. Sentausa • Endang A. Suprijatna • Peter Eko Budi Darwito
9.	April 23, 2024	Review of Draft Published Financial Statements as of March 31, 2024 (Unaudited)	• Iqbal Latanro • Sentot A. Sentausa • Andin Hadiyanto • Bambang Widjanarko sebagai pengamat • Endang A. Suprijatna • Peter Eko Budi Darwito
10.	May 15, 2024	Discussion on Internal Audit Division (IAD) Activity Report for Q1 2024	• Iqbal Latanro • Sentot A. Sentausa • Bambang Widjanarko sebagai pengamat • Endang A. Suprijatna • Peter Eko Budi Darwito
11.	May 27, 2024	Appointment of a Corporate Rating Agency for PT Bank Tabungan Negara (Persero) Tbk for Fiscal Year 2024	• Iqbal Latanro • Sentot A. Sentausa • Andin Hadiyanto • Bambang Widjanarko sebagai pengamat • Endang A. Suprijatna • Peter Eko Budi Darwito

No.	Date	Meeting Agenda	Participant
12.	June 03, 2024	Quarterly Audit Committee Report	• Iqbal Latanro • Sentot A. Sentausa • Andin Hadiyanto • Bambang Widjanarko sebagai pengamat • Endang A. Suprijatna • Peter Eko Budi Darwito
13.	June 10, 2024	Progress of Internal Control over Financial Reporting (ICoFR) Diagnostics	• Iqbal Latanro • Sentot A. Sentausa • Andin Hadiyanto • Bambang Widjanarko sebagai pengamat • Endang A. Suprijatna • Peter Eko Budi Darwito
14.	July 01, 2024	Follow-Up on the Audit Findings Report by BPK-RI	• Iqbal Latanro • Sentot A. Sentausa • Andin Hadiyanto • Bambang Widjanarko sebagai pengamat • Endang A. Suprijatna • Peter Eko Budi Darwito
15.	July 08, 2024	Discussion on Governance Self-Assessment and Internal Audit Exit Meeting Results	• Iqbal Latanro • Sentot A. Sentausa • Andin Hadiyanto • Bambang Widjanarko sebagai pengamat • Endang A. Suprijatna • Peter Eko Budi Darwito
16.	July 22, 2024	Review of Draft Published Financial Statements as of June 30, 2024 (Unaudited)	• Iqbal Latanro • Sentot A. Sentausa • Andin Hadiyanto • Bambang Widjanarko sebagai pengamat • Endang A. Suprijatna • Peter Eko Budi Darwito
17.	August 05, 2024	Implementation Report of Q2 2024 Audit	• Iqbal Latanro • Sentot A. Sentausa • Andin Hadiyanto • Bambang Widjanarko sebagai pengamat • Endang A. Suprijatna • Peter Eko Budi Darwito
18.	August 12, 2024	Fraud Handling Protocol and Anti-Fraud Strategy Implementation	• Iqbal Latanro • Sentot A. Sentausa • Bambang Widjanarko sebagai pengamat • Endang A. Suprijatna • Peter Eko Budi Darwito
19.	August 19, 2024	Implementation of POJK Governance for UUS, UUS Performance Achievements, Preparation for UUS Spin-Off, and DPS KPI	• Iqbal Latanro • Sentot A. Sentausa • Andin Hadiyanto • Bambang Widjanarko sebagai pengamat • Endang A. Suprijatna • Peter Eko Budi Darwito
20.	August 26, 2024	Q2 2024 Audit Committee Report	• Iqbal Latanro • Sentot A. Sentausa • Andin Hadiyanto • Bambang Widjanarko sebagai pengamat • Endang A. Suprijatna • Peter Eko Budi Darwito

No.	Date	Meeting Agenda	Participant
21.	September 2, 2024	Evaluation of Internal Audit Performance	• Iqbal Latanro • Sentot A. Sentausa • Andin Hadiyanto • Bambang Widjanarko sebagai pengamat • Endang A. Suprijatna • Peter Eko Budi Darwito
22.	September 2, 2024	Procurement of Public Accounting Firm Services	• Iqbal Latanro • Sentot A. Sentausa • Andin Hadiyanto • Bambang Widjanarko sebagai pengamat • Endang A. Suprijatna • Peter Eko Budi Darwito
23.	September 30, 2024	Procurement of Construction Services for Learning Center Development	• Iqbal Latanro • Sentot A. Sentausa • Andin Hadiyanto • Bambang Widjanarko sebagai pengamat • Endang A. Suprijatna • Peter Eko Budi Darwito
24.	September 30, 2024	Internal Audit Policy and Data Analytics	• Iqbal Latanro • Sentot A. Sentausa • Andin Hadiyanto • Bambang Widjanarko sebagai pengamat • Endang A. Suprijatna • Peter Eko Budi Darwito
25.	October 14, 2024	Thematic Audit Findings on Mortgage Distribution & High Yield Consumer Loans; and Internal Audit Process Activities	• Iqbal Latanro • Sentot A. Sentausa • Bambang Widjanarko • Endang A. Suprijatna • Peter Eko Budi Darwito
26.	October 28, 2024	Progress of General Audit Technical Guidelines Preparation	• Iqbal Latanro • Sentot A. Sentausa • Bambang Widjanarko • Endang A. Suprijatna • Peter Eko Budi Darwito
27.	October 28, 2024	Review of Internal Control over Financial Reporting (ICoFR) Diagnostics	• Iqbal Latanro • Sentot A. Sentausa • Bambang Widjanarko • Endang A. Suprijatna • Peter Eko Budi Darwito
28.	November 04, 2024	Recommendation for the Appointment of KAP for the Limited Review of Financial Statements as of September 30, 2024	• Iqbal Latanro • Sentot A. Sentausa • Bambang Widjanarko • Endang A. Suprijatna • Peter Eko Budi Darwito
29.	November 11, 2024	Implementation Report of Q3 2024 Internal Audit Activities	• Iqbal Latanro • Sentot A. Sentausa • Bambang Widjanarko • Endang A. Suprijatna • Peter Eko Budi Darwito
30.	November 11, 2024	Update on General Internal Control System Policy	• Iqbal Latanro • Sentot A. Sentausa • Bambang Widjanarko • Endang A. Suprijatna • Peter Eko Budi Darwito

No.	Date	Meeting Agenda	Participant
31.	November 13, 2024	Quarterly Audit Committee Report	• Iqbal Latanro • Sentot A. Sentausa • Bambang Widjanarko • Endang A. Suprijatna • Peter Eko Budi Darwito
32.	November 18, 2024	Response to the Procurement of ECOPARK Construction Services and Review of Work Programs of the Board of Commissioners' Supporting Organs	• Iqbal Latanro • Sentot A. Sentausa • Bambang Widjanarko • Endang A. Suprijatna • Peter Eko Budi Darwito
33.	November 25, 2024	*Closing Meeting of Limited Review of Financial Statements*	• Iqbal Latanro • Sentot A. Sentausa • Bambang Widjanarko • Endang A. Suprijatna • Indra Jaka Aprilyanta
34.	November 27, 2024	Review of Draft Published Financial Statements as of September 30, 2024 (Reviewed)	• Iqbal Latanro • Sentot A. Sentausa • Bambang Widjanarko • Endang A. Suprijatna • Indra Jaka Aprilyanta
35.	November 28, 2024	Response to Special Audit Reports	• Iqbal Latanro • Sentot A. Sentausa • Bambang Widjanarko • Endang A. Suprijatna • Indra Jaka Aprilyanta
36.	December 2, 2024	Internalization of Internal Control over Financial Reporting Policies	• Iqbal Latanro • Sentot A. Sentausa • Bambang Widjanarko • Endang A. Suprijatna • Indra Jaka Aprilyanta
37.	December 9, 2024	Audit Committee Charter and Work Program	• Iqbal Latanro • Sentot A. Sentausa • Bambang Widjanarko • Endang A. Suprijatna • Indra Jaka Aprilyanta
38.	December 16, 2024	Approval of General Internal Control System Policy and Response to KBUMN Letter	• Iqbal Latanro • Sentot A. Sentausa • Bambang Widjanarko • Endang A. Suprijatna • Indra Jaka Aprilyanta
39.	December 31, 2024	Discussion on Disclosure of Information (KI) on Affiliated Transactions	• Iqbal Latanro • Sentot A. Sentausa • Bambang Widjanarko • Endang A. Suprijatna • Indra Jaka Aprilyanta

MEETING FREQUENCY AND ATTENDANCE LEVEL OF THE AUDIT

Throughout 2024, the Audit Committee has held 39 meetings. The frequency and level of meeting attendance for each member of the Audit Committee is as follows.

Table of Audit Committee Meeting Attendance Level

No.	Name	Position	Audit Committee Meetings		
			Number of Meeting	Number of Attendance	Percentage
1.	Iqbal Latanro	Chairperson and concurrent member	39	39	100.00%
2.	Sentot A. Sentausa	Member	39	39	100.00%
3.	Bambang Widjanarko	Member[1]	15	15	100.00%
4.	Andin Hadiyanto	Member[2]	25	20	80.00%
5.	Endang A. Suprijatna	Member	39	36	92.31%
6.	Indra Jaka Aprilyanta	Member[3]	7	7	100.00%
7.	Peter Eko Budi Darwito	Member[4]	32	32	100.00%

[1]) Appointed as a member of the Audit Committee on March 13, 2024, and effective based on the Fit and Proper Test Decision by the Financial Services Authority on October 7, 2024
[2]) Term of office ends on October 15, 2024
[3]) Appointed as a member of the Audit Committee on November 19, 2024
[4]) Term of office ends on November 18, 2024.

Audit Committee Work Plan and Implementation of Duties in 2024

No.	Activities	Accomplishment
	A. REGULAR ACTIVITIES:	
1.	Providing input and recommendations for Approval of the Annual Audit Planto the Board of Commissioners.	Accomplished
2.	Monthly monitoring and evaluation of the implementation of tasks & follow-up of Internal Audit, including internal control.	Accomplished
3.	Attending the Exit Meeting for General Internal Audit (IAD).	Accomplished
4.	Monitoring and evaluating the implementation of audits by External Auditors (OJK, BI, BPK, Audit Firms, etc.), including follow-up on audit results.	Accomplished
5.	Checking and evaluating Quarterly Financial Publication Reports.	Accomplished
6.	Providing recommendations on the appointment of Public Accountants to the Board of Commissioners for decision in the General Shareholders' Meeting.	Accomplished
7.	Conveying recommendations on the appointment of Public Accountants to the Board of Commissioners to be submitted to the Ministry of State-Owned Enterprises in the context of the General Shareholders' Meeting agenda.	Accomplished
8.	Monitoring reports on the appointment of Public Accounting Firms according to the General Shareholders' Meeting to the OJK.	Accomplished
9.	Monitoring the progress of audits by KAP	Accomplished
10.	Providing an evaluation of the implementation of the provision of Audit Services for Financial Information by KAP to be submitted to the OJK	Accomplished
11.	Evaluating the implementation of Financial Information Audit Services by the Public Accounting Firm for submission to KBUMN	Accomplished

No.	Activities	Accomplishment
12.	Recommending the procurement and appointment of Rating Companies for assessing SOE's SoundnessLevel	Accomplished
13.	Reviewing, evaluating, and providing input to the Board of Commissioners regarding the monthly performance review material presented by the Board of Directors	Accomplished
14.	Compiling quarterly and annual reports on the activities of the Audit Committee to the Board of Commissioners	Accomplished
15.	Preparing the Board of Commissioners' Supervision Report on RBB Realization (Semi-Annual) for submission to the Financial Services Authorithy (Audit Committee section)	Accomplished
16.	Preparing the Board of Commissioners' Response to Corporate Performance (Quarterly) for submission to the Minister of SOEs (Audit Committee section)	Accomplished
17.	Preparing the Payment System Report for Bank Indonesia (Audit Committee section)	Accomplished
18.	Assessment of the completion of the Self-Assessment GCG Half-Yearly Working Papers by the Audit Committee & Board of Commissioners.	Accomplished
19.	Compiling the Annual Report related to the Audit Committee and Board of Commissioners.	Accomplished
20.	Preparing the AGMS scenario (Audit Committee section)	Accomplished
	B. NON-REGULAR ACTIVITIES:	
1.	Providing independent opinions in the event of differences of opinion between Management and Public Accountants regarding the services provided	There is no difference of opinion yet
2.	Reviewing complaints related to the bank's accounting and financial reporting processes	There is no difference of opinion yet
3.	Accompanying members of the Board of Commissioners on working visits to BTN offices as assigned by the Board of Commissioners	Accomplished
4.	Participating in training, seminars, workshops as assigned by the Board of Commissioners for Competency Development related to Duties and Responsibilities	Accomplished
5.	Providing recommendations to the Board of Commissioners and guidance to work units in line with the Audit Committee's duties and responsibilities as per its charter	Accomplished
	C. OTHERS	
1.	Audit Committee Meetings	Accomplished
2.	Providing input on the RKAP and RBB concepts prepared by Management	Accomplished

Audit Committee Statement on the Effectiveness of Internal Control System

The internal control system implemented by BTN has generally been running well. Management continues to strive to improve the implementation of the internal control system by referring to internal and external audit reports.

Remuneration and Nomination Committee

Remuneration and Nomination Committee is formed by and is responsible to the Board of Commissioners, whose task is to assist the Board of Commissioners in carrying out their duties. The Remuneration and Nomination Committee is one of the corporate organs, working together with the Human Capital Division and Learning Center Division as a tool owned by the Board of Directors for raising human capital as strategic assets and strategic partners, analyzing policies, monitoring the implementation of preparing prospective leaders that will be a role model, and providing meticulous attention to the implementation of good corporate governance, including policies and the amount of remuneration.

Legal Basis for Establishing the Remuneration and Nomination Committee

The Company establishes the Nomination and Remuneration Committee in accordance with the following Regulations, Provisions and Legislation::

1. Bank Indonesia Circular Letter No. 11/28/DPbS dated October 5, 2009, concerning Sharia Business Units, as amended by Bank Indonesia Circular Letter No. 15/51/DPbS dated December 30, 2013.
2. Bank Indonesia Regulation No. 11/33/PBI/2009 dated December 7, 2009, concerning the Implementation of Good Corporate Governance for Sharia Commercial Banks and Sharia Business Units.
3. OJK Regulation No. 33/POJK.04/2014 dated December 1, 2014, regarding the Board of Directors and Board of Commissioners of Issuers or Public Companies.
4. OJK Regulation No. 34/POJK.04/2014 dated December 8, 2014, regarding the Nomination and Remuneration Committee of Issuers or Public Companies.
5. OJK Regulation No. 45/POJK.03/2015 dated December 23, 2015, regarding the Implementation of Governance in Providing Remuneration for Commercial Banks.
6. OJK Circular Letter No. 40/SEOJK.03/2016 dated September 26, 2016, regarding the Implementation of Governance in Providing Remuneration for Commercial Banks.
7. OJK Regulation No. 59/POJK.03/2017 dated December 18, 2017, regarding the Implementation of Governance in Providing Remuneration for Sharia Commercial Banks and Sharia Business Units.
8. OJK Regulation No. 41/POJK.03/2019 dated December 26, 2019, on Mergers, Consolidations, Acquisitions, Integrations, and Conversions of Commercial Banks.
9. OJK Regulation No. 4242/POJK.04/2020 dated July 1, 2020, on Affiliated Transactions and Conflict of Interest Transactions;
10. OJK Regulation No. 8 of 2023 dated June 14, 2023, on the Implementation of Anti-Money Laundering, Prevention of Terrorism Financing, and Prevention of Proliferation Financing of Weapons of Mass Destruction in the Financial Services Sector.
11. OJK Regulation No. 17 of 2023 dated September 14, 2023 concerning the Implementation of Governance for Commercial Banks.
12. OJK Regulation No. 2 of 2024 dated February 16, 2024, on the Implementation of Sharia Governance for Sharia Commercial Banks and Sharia Business Units.
13. Financial Services Authority Circular Letter No. 39/SEOJK.03/2016 dated September 13, 2016, on Fit and Proper Test for Candidates of Controlling Shareholders, Candidates of the Board of Directors, and Candidates of the Board of Commissioners.
14. Decree of the Minister of State-Owned Enterprises No. PER-1/ MBU/03/2023 dated March 24, 2023, regarding Special Assignments and Corporate Social and Environmental Responsibility Programs of State-Owned Enterprises.
15. Decree of the Minister of State-Owned Enterprises No. PER-2/MBU/03/2023 dated March 24, 2023, regarding Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises.
16. Decree of the Minister of State-Owned Enterprises No. PER-3/MBU/03/2023 dated March 24, 2023, regarding the Organization and Human Resources of State-Owned Enterprises.
17. Articles of Association of PT Bank Tabungan Negara (Persero) Tbk.
18. Joint Agreement Letter of the Board of Commissioners of PT Bank Tabungan Negara (Persero) Tbk No. 01/SKB/KOM/BTN/2024 and the Board of Directors No. SKB-01/DIR-BTN/2024 on Guidelines for the Working Relationship between the Board of Commissioners and the Board of Directors.
19. Board of Commissioners Decree No. 18/KOM/BTN/2024 dated December 18, 2024, on Guidelines and Rules of Procedure for the Board of Commissioners.
20. Board of Commissioners Decree No. 20/KOM/BTN/2024 dated December 18, 2024, on Guidelines and Rules of Procedure for the Remuneration and Nomination Committee.

Duties and Responsibilities of Remuneration and Nomination Committee

In accomplishing its main duties, the Committee is responsible to the Board of Commissioners for the following detailed responsibilities:

1. The duties of the Committee regarding remuneration are:
   a. The Committee provides recommendation to the Board of Commissioners related to:
      - Structure of remuneration.
      - Policy regarding remuneration.
      - Rate of remuneration.
   b. The Committee assists the Board of Commissionaires to assess the appropriateness between working performance and remuneration received by each member of Board of Directors and/or Board of Commissionaires.
   c. In completing the remuneration-related duties, it is obliged for the Committee to do the following procedure:
      - Formulating the structure, policy, and rate of remuneration for members of Board of Directors and/or Board of Commissionaires; and
      - Formulating structure, policy, and remuneration for members of Sharia Supervisory Board (DPS).
   d. The said remuneration structure may be in the form of fixed and/or variable salary, honorarium, incentive, or allowance.

e. The drafting of structure, policy, and rate of remuneration has to consider the following aspects:
   - The relevance of remuneration applied to industries to the Bank's business activities and business scale.
   - Duty, responsibility, and authority of members of the Board of Directors and/or Board of Commissionaires associated with the Bank's goal achievement and performance.
   - The target of performance or the performance of each member of the Board of Directors and/or Board of Commissionaires.
   - Balance between the fixed and the variable allowance.

f. The Committee evaluates remuneration-related policy which is based on performance, risk, fairness with peer groups, target, Company's long-term strategy, reserve fulfillment as regulated in the constitution, and the Company's future income potential.

g. The Committee delivers the result of the evaluation and recommendation to the Board of Commissionaires regarding:
   - Remuneration policy for the Board of Directors, Board of Commissionaires, and Sharia Supervisory Board to be delivered in the General Meeting of Shareholders (GMS).
   - Overall remuneration for employees to be submitted to the Board of Directors.

h. The Committee carries out regular evaluation for at least once a year regarding the structure, policy, and rate of remuneration.

i. The Committee formulates and evaluates the payroll and allowance system of the members of Board of Commissionaires, and provides recommendation related to:
   - Assessment of the system;
   - Available options, one of which is stock option;
   - Retirement System, Pension; and
   - Compensation System and other benefits of employee reduction.

j. The Committee accomplishes other remuneration-related duties from the Board of Commissioners.

2. The duties of the Committee regarding Nomination are:
   a. The Committee provides recommendation to the Board of Commissioners regarding the following matters:
      - Nomination of Director candidates referring to the Company's strategy;
      - Composition of members of the Board of Directors and/or Board of Commissioners;
      - Required policy and criteria for Nomination process;
      - Performance evaluation policy for members of the Board of Directors and/or Board of Commissioners; and
      - Proposal for appointment and/or replacement of members of Sharia Supervisory Board to be submitted in the GMS.
   b. The Committee assists the Board of Commissioners to conduct performance assessment of members of the Board of Directors and/or Board of Commissioners by referring to the valid parameters as an evaluation material.
   c. The Committee offers recommendation to the Board of Commissioners concerning competency development program for members of the Board of Directors and/or Board of Commissioners.
   d. The Committee recommends proposed candidates who are eligible to be appointed as members of the Board of Directors and/or Board of Commissioners to the Board of Commissioners to be submitted in the GMS.
   e. In accomplishing its Nomination function, the Committee is obliged to complete the following procedures:
      - Formulating the composition and process of nomination for members of the Board of Directors and/or Board of Commissioners.
      - Formulating necessary policy and criteria for the Nomination process of the candidates of the Board of Directors and/or Board of Commissioners.
      - Assisting the evaluation of the performance of members of the Board of Directors and/or Board of Commissioners.
      - Formulating competency development program for members of the Board of Directors and/or Board of Commissioners.
      - Reviewing and proposing qualified member candidates of the Board of Directors and/or Board of Commissioners to the Board of Commissioners to be submitted in the GMS.
   f. The Committee formulates, implements, and analyzes criteria and procedure of nomination for the candidates of Sharia Supervisory Board.
   g. Developing a system and mechanism for assessing the performance of the Board of Commissioners, Board of Directors, and Sharia Supervisory Board.
   h. Monitoring and analyzing criteria and nomination procedures for other executives up to one level below the Board of Directors.
   i. Conducting identification and monitoring of the profiles of the Board of Commissioners, Board of Directors, and Executive Officers, particularly those who have been and will be included in the nominated talent pool, through:

- Researching via the internet and/or print media, including social media monitoring.
- Verifying the State Officials' Wealth Report (LHKPN).
- Ensuring that the Board of Commissioners, Board of Directors, and Executive Officers do not have non-performing loans or financial issues or have been declared bankrupt.
- Ensuring that the Board of Commissioners, Board of Directors, and Executive Officers are not engaged in activities/actions prohibited by applicable regulations

j. Conducting early detection of abuse of authority through crime/misuse of authority detection reports using the Whistle Blowing System (WBS) mechanism involving the Board of Commissioners, Board of Directors, and Executive Officers.
k. Providing reports on the identification and monitoring results of the profiles of the Board of Commissioners, Board of Directors, and Executive Officers to the President Commissioner.
l. Providing recommendations to the Board of Commissioners regarding Independent Parties who will become members of the audit committee as referred to in OJK Regulation No. 17 of 2023 dated September 14, 2023, on the Implementation of Governance for Commercial Banks, Article 64, Paragraph (1) Letter b, as well as members of the risk monitoring committee as referred to in Article 65, Paragraph (1) Letters b and c.
m. Reviewing the management system of the Human Resources Work Unit and human resource development policies, covering recruitment, assessment, competency enhancement, evaluation, promotion, demotion, termination, succession, selection, and other related aspects.
n. Carrying out other tasks assigned by the Board of Commissioners related to Nomination duties in accordance with applicable regulations and aligned with Shareholders' Aspirations.
o. The members of the Committee are obliged to sign integrity pact containing statement and commitment to comply with all statutory provisions and principles of good corporate governance).

Remuneration and Nomination Committee Charter

In carrying out its duties and responsibilities, the Remuneration and Nomination Committee refers to the Guidelines and Code of Conduct of the Remuneration and Nomination Committee based on the Board of Commissioners Decree No. 20/KOM/BTN/2024 dated December 18, 2024, concerning the Guidelines and Code of Conduct of the Remuneration and Nomination Committee of PT Bank Tabungan Negara (Persero) Tbk. Remuneration and Nomination Committee Work Guidelines and Rules aims to allow the Committee to work optimally and to ensure that the provisions recommendation for the remuneration and nomination of members of the Board of Commissioners, Board of Directors, Executives, Employees, and Human Capital policy is in accordance with the principles of Good Corporate Governance.

The Content of the Charter of Remuneration and Nomination Committee is as follows:

Chapter I	General Provision	Article 1	Definition
		Article 2	Purpose of Committee Formation
Chapter II	Duty, Responsibility, and Authority of the Committee	Article 3	Committee Duties
		Article 4	Responsibilities
		Article 5	Authority
Chapter III	Structure and Membership	Article 6	Composition and Structure
		Article 7	Membership Requirements
		Article 8	Term of Office
Chapter IV	Work Mechanism and Relationship	Article 9	Work Mechanism
		Article 10	Working Relationships
		Article 11	Supporting Staff

Chapter V	Work Plan and Implementation	Article 12	Work Plan and Budgeting
		Article 13	Committee Meetings
		Article 14	Reporting
		Article 15	Performance Evaluation
Chapter VI	Competency and Income Development	Article 16	Competency Development
		Article 17	Committee Member Compensation
Chapter VII	Closing	Article 18	Closing

Authority of The Remuneration and Nomination Committee

The Committee holds the following authorities granted by the Board of Commissioners:

1. Reviewing, examining, analyzing, and giving opinions and recommendations within the coverage of their duty.
2. Requesting the Bank to survey and/or do benchmarking according to the needs of the Committee.
3. Requesting, researching, and obtaining necessary information from the Bank's internal and external parties.
4. Seeking and obtaining various information including necessary documents from: a. Bank BTN (including Bank employees); and/or b. Other relevant parties.
5. Being provided with inputs and/or suggestions from the Bank BTN's external parties in relation to their duties.
6. Performing direct communication with relevant parties related the committee's duties.

Term of Office of The Remuneration and Nomination Committee

1. The term of office of the Committee members who holds concurrent position in the Board of Commissioners shall end accordingly once their position as member of the Board of Commissioners ends;
2. The term of office of the Committee members who is not a concurrent member of the Board of Commissioners is 3 (three) years at the maximum and is extendable for once within 2 (two) terms of office provided that the Board of Commissioners is still entitled to dismiss the respected Committee members at any time;
3. If a concurrent member of the Board of Commissioners holding a position as the chairman of the Committee releases his status as a member of the Board of Commissioners, the position of the Committee chairman must be replaced by another member of the Board of Commissioners within 30 (thirty) days at maximum.
4. Replacement of Remuneration and Nomination Committee members who are not from the Board of Commissioners must be conducted within a maximum period of sixty (60) days after the concerned Committee member is no longer able to perform their function.

Structure, Membership, and Expertise of The Remuneration and Nomination Committee

The composition of Remuneration and Nomination Committee should at least have 1 (one) Independent Commissioner, 1 (one) Commissioner, and 1 (one) Executive who supervises human resources or 1 (one) employee representative. The Committee is led by the Independent Commissioner.

If the Remuneration and Nomination Committee has more than 3 (three) personnel, there should be at least 2 (two) Independent Commissioners. When necessary, the Remuneration and Nomination Committee may appoint independent members from an outside Bank BTN.

Members of the Remuneration and Nomination Committee are appointed by the Board of Directors by referring to the decision made in the meeting of the Board of Commissioners. The Executives or representatives of the Remuneration Committee members must be knowledgeable about the Bank's remuneration system, nomination system, and succession plan.

Members of the Committee are appointed and dismissed based on the decision made in the meeting of the Board of Commissioners. The decision has to be followed-up by the Board of Directors by issuing letter of appointment/ dismissal. The respected decision shall be documented. The chairman of the Committee can only hold concurrent positions as the chairman of the committee for 1 (one) other Committee at the maximum.

Table of the Remuneration and Nomination Committee's Structure, Membership, and Expertise

Name	Position	Information	Expertise	Period	Term of Office		Basis of Appointment
					Starting	End	
Chandra M. Hamzah	Chairman concurrently Member	President Commissioner/ Independent	*Law, Finance, Risk Management, and People Management*	Second	March 6, 2024	AGM 2029	Board of Commissioners' Decision No. 03/KOM/ BTN/2024 dated March 6, 2024
Iqbal Latanro	Member	Vice President Commissioner/ Independent	*Banking, Compliance, Risk Management, and People Management*	First	March 10, 2021	AGM 2026	Board of Commissioners' Decision No. 03/KOM/ BTN/IV/2021 dated April 1, 2021
Armand B. Arief	Member	Independent Commissioner	*Banking, Risk Management, Business Management, and People Management*	First	March 6, 2024	AGM 2029	Board of Commissioners' Decision No. 03/KOM/ BTN/2024 dated March 6, 2024
Sentot A. Sentausa	Member	Independent Commissioner	Banking, Compliance, and Risk Management	First	March 17, 2022	AGM 2027	Board of Commissioners' Decision No. 02/KOM/ BTN/2022 dated March 17, 2022
Adi Sulistyowati	Member[1]	Independent Commissioner[2]	Banking, Risk Management, and Business Management	Second	13 Maret 2024	RUPST Tahun 2029	Board of Commissioners' Decision No. 05/KOM/ BTN/2024 dated March 13, 2024
Bambang Widjanarko	Member[1]	Independent Commissioner[2]	Accounting, Audit, Sharia Banking, and Business Management	First	March 13, 2024	AGM Year 2029	Board of Commissioners' Decision No. 05/KOM/ BTN/2024 dated March 13, 2024
Andin Hadiyanto	Member	Commissioner	Banking, Compliance, Risk Management, and Business Administration	First	March 6, 2024	AGM Year 2029	Board of Commissioners' Decision No. 03/KOM/ BTN/2024 dated March 6, 2024
Herry Trisaputra Zuna	Member	Commissioner	Macroeconomics, Risk Management, and Business Administration	First	March 17, 2022	AGM Year 2027	Board of Commissioners' Decision No. 02/KOM/ BTN/2022 dated March 17, 2022
Himawan Arief Sugoto	Member	Commissioner	Management and Business, Risk Management, Finance, Agrarian and Spatial Planning	Second	March 17, 2022	AGM Year 2027	Board of Commissioners' Decision No. 02/KOM/ BTN/2022 dated March 17, 2022
Mohamad Yusuf Permana	Member[3]	Commissioner	*Banking, Macroeconomics, Risk Management, and People Managemen*	First	January 11, 2023	March 4, 2024	Board of Commissioners' Decision No. 04/KOM/ BTN/2023 dated January 18, 2023
Moch. Amin Nurdin	Member	Independent Party	*Human Capital, Finance, and Corporate Relations*	second	November 7, 2024	November 6, 2026	Board of Directors' Decision No. 1065/ DIR/2024 dated November 19, 2024 on Extension of the Term of Office of the Remuneration and Nomination Committee Member of PT Bank Tabungan Negara (Persero) Tbk.

Name	Position	Information	Expertise	Period	Term of Office		Basis of Appointment
					Starting	End	
Rahmayati	Anggota (*Ex Officio*)	Executive Officer overseeing Human Resources	*Human Capital, Finance, and Corporate Relations*	first	March 17, 2022	March 16, 2025	Decision of the Board of Commissioners Number 02/KOM/ BTN/2022 dated March 17, 2022

[1]) Appointed as a member of the Remuneration and Nomination Committee on March 13, 2024
[2]) Effective based on the Fit and ProperTest Decision by the Financial Services Authority on October 7, 2024
[3]) Term of office ends on March 4, 2024

PROFILE OF THE REMUNERATION AND NOMINATION COMMITTEE

The profile of the Remuneration and Nomination Committee as of December 31, 2024 is as follows.. .

Chandra M. Hamzah
Chairman of the Remuneration and Nomination Committee/ President Commissioner/ Independent

The profile can be found in the Board of Commissioners' Profile section.

His tenure as Chairman and concurrent member of the Remuneration and Nomination Committee runs from November 27, 2019, to the 2024 AGMS (First Term) and from March 6, 2024, to the 2029 AGMS (Second Term).

Iqbal Latanro
Member of the Remuneration and Nomination Committee/ Vice President Commissioner/ Independent

The profile can be found in the Board of Commissioners' Profile section.

His tenure as a member of the Remuneration and Nomination Committee runs from March 10, 2021, to November 26, 2026 (First Term).

Armand B. Arief
Member of the Remuneration and Nomination Committee/ Independent Commissioner

The profile can be found in the Board of Commissioners' Profile section.

His tenure as a member of the Remuneration and Nomination Committee runs from November 27, 2019, to the 2024 AGMS (First Term) and from March 6, 2024, to the 2029 AGMS (Second Term).

Sentot A. Sentausa
Member of the Remuneration and Nomination Committee/ Independent Commissioner

The profile can be found in the Board of Commissioners' Profile section.

His tenure as a member of the Remuneration and Nomination Committee runs from March 2, 2022, to March 1, 2027 (First Term).

Adi Sulistyowati
Member of the Remuneration and Nomination Committee/ Independent Commissioner

The profile can be found in the Board of Commissioners' Profile section.

Her tenure as a member of the Remuneration and Nomination Committee runs from March 13, 2024, to the 2029 AGMS (First Term).

Bambang Widjanarko
Member of the Remuneration and Nomination Committee/ Independent Commissioner

The profile can be found in the Board of Commissioners' Profile section.

His tenure as a member of the Remuneration and Nomination Committee runs from March 13, 2024, to the 2029 AGMS (First Term).

Andin Hadiyanto
Member of the Remuneration and Nomination Committee/ Commissioner

The profile can be found in the Board of Commissioners' Profile section.

His tenure as a member of the Remuneration and Nomination Committee runs from November 27, 2019, to the 2024 AGMS (First Term) and from March 6, 2024, to the 2029 AGMS (Second Term).

Herry Trisaputra Zuna
Anggota Komite Remunerasi dan Nominasi/ Komisaris

The profile can be found in the Board of Commissioners' Profile section.

His tenure as a member of the Remuneration and Nomination Committee runs from March 2, 2022, to the 2027 AGMS (First Term).

Himawan Arief Sugoto
Anggota Komite Remunerasi dan Nominasi/ Komisaris

The profile can be found in the Board of Commissioners' Profile section.

His tenure as a member of the Remuneration and Nomination Committee runs from March 2, 2022, to the 2027 AGMS (First Term).



Moch. Amin Nurdin

Member of the Remuneration and Nomination Committee/ Independent Party

Indonesia citizen,
Tegal, November 1, 1973
51 years old as of December 2024,
Domiciles Bekasi, West Java.

Educational background

- Bachelor's Degree (S1) in Business Administration, Diponegoro University, Semarang (1997).
- Master's Degree (S2) in Marketing, PPM Graduate School of Management, Jakarta (2006).
- Master's Degree (S2) in Human Resource Management, Mercu Buana University, Jakarta (2019)

Work experience

- Head of Bank Training Division, Indonesian Banking Development Institute (LPPI), 2022 – January 16, 2025
- Head of LPK LPPI, Indonesian Banking Development Institute, 2020
- Head of Marketing and Training Division 1, LPPI, 2020
- Senior Faculty, LPPI, Indonesian Banking Development Institute, 2018
- Jakarta Area Head, Bank CIMB Niaga, 2008

Certification

- Banking Risk Management Certification in accordance with KKNI Level 5
- Certified Audit Committee Practices, 2023
- Certified Human Resources Analyst, 2018
- Certified Trainer for General Banking Level 1,2,3, 2014

Basis of Appointment

- Board of Directors' Decision No. 1003/DIR/2021 dated November 8, 2021, on the Appointment of Mr. Moch. Amin Nurdin as a Member of the Remuneration and Nomination Committee
- Board of Directors' Decision No. 1065/DIR/2024 dated November 19, 2024, on the Extension of the Term of Office of the Remuneration and Nomination Committee Member of PT Bank Tabungan Negara (Persero) Tbk

Period of Office

- First Term: November 7, 2021 – November 6, 2024
- Second Term: November 7, 2024 – November 6, 2026

Concurrent Position

Division Head of Bank Training , Indonesian Banking Development Institute, (2022 to January 16, 2025)



Rahmayati

Anggota Komite Remunerasi dan Nominasi (*Ex-Officio*)

Indonesia citizen,
Ujung Pandang, July 13, 1973
51 Years old as of December 2024,
domiciled East Jakarta, DKI Jakarta.

Educational background

- Bachelor's Degree (S1) Civil Engineering, Hasanuddin University
- Master's Degree (S2) in Busines management, The Australian National

Work experience

- Human Capital Management Division Head, Human Capital Management - Human Capital Management Division Head, Human Capital Management Division (October 1, 2022 – present)
- Acting Human Capital Management Division Head, Human Capital Management Division (February 14, 2022 – September 30, 2022)
- Sharia Funding & Treasury Deputy, Sharia Business Division (December 1, 2021 – February 13, 2022)
- Sharia Business Deputy, Sharia Business Division (April 1, 2021 – November 30, 2021)

Certification

- Certified Human Resources Manager (2023)
- Refresher for Risk Management Certification Level 3 (2022)
- Basic Knowledge Certification in Pension Fund (2022)
- PSAK 24 Training (2022)
- Treasury Level Basic Certification (2021))
- Treasury Level Basic Certification (2021)
- 4DX : Managers Implementation (2020)
- Certified Professional Human Resource (2019)

Basis of Appointment

Board of Commissioners' Decision No. 02/KOM/BTN/2022 dated March 17, 2022

Period of Office

First Term: March 17, 2022 – March 16, 2025.

Concurrent Position

Human Capital Management Division Head, Human Capital Management Division (October 1, 2022 – present)

Independency of The Remuneration and Nomination Committee

Table of Independence of the Remuneration and Nomination Committee

Aspect of Independency	Chandra M. Hamzah	Iqbal Latanro	Armand B. Arief	Sentot A. Sentausa	Adi Sulistyowati	Bambang Widjanarko	Andin Hadiyanto	Herry Trisaputra Zuna	Himawan Arief Sugoto	Mohamad Yusuf Permana	Moch. Amin Nurdin	Rahmayati
Not having financial association with the Board of Commissioners and Directors	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Not having management association in the company, subsidiary company, or affiliated company	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Not having association of share ownership more than or equal to 5% (fivepercent) in the Company	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Not having familial relationship with the Board of Commissioners, Directors, and/or fellow members of the Risk Monitoring Committee	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Not serving as administrators of political parties, public officials and government	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

Training and/or Competency Development of The Remuneration and Nomination Committee In 2024

Name	Position	Types of Training and Development Materials Competency / Training	Time and place Implementation	Organizer
Chandra M. Hamzah	Chairman and concurrent member	Education and/or Competence Enhancement are reflected in the Education and/or Competence Enhancement section of the Board of Commissioners.		
Iqbal Latanro	Member	Education and/or Competence Enhancement are reflected in the Education and/or Competence Enhancement section of the Board of Commissioners.		
Armand B. Arief	Member	Education and/or Competence Enhancement are reflected in the Education and/or Competence Enhancement section of the Board of Commissioners.		
Sentot A. Sentausa	Member	Education and/or Competence Enhancement are reflected in the Education and/or Competence Enhancement section of the Board of Commissioners.		
Adi Sulistyowati	Member	Education and/or Competence Enhancement are reflected in the Education and/or Competence Enhancement section of the Board of Commissioners.		
Bambang Widjanarko	Member	Education and/or Competence Enhancement are reflected in the Education and/or Competence Enhancement section of the Board of Commissioners.		
Andin Hadiyanto	Member	Education and/or Competence Enhancement are reflected in the Education and/or Competence Enhancement section of the Board of Commissioners.		
Herry Trisaputra Zuna	Member	Education and/or Competence Enhancement are reflected in the Education and/or Competence Enhancement section of the Board of Commissioners.		
Himawan Arief Sugoto	Member	Education and/or Competence Enhancement are reflected in the Education and/or Competence Enhancement section of the Board of Commissioners.		
Mohamad Yusuf Permana[1]	Member	Education and/or Competence Enhancement are reflected in the Education and/or Competence Enhancement section of the Board of Commissioners.		
Moch. Amin Nurdin	Member	Executive Risk Management Program - Level 4	January 27, 2024, in Bogor	LPPI
		Risk Management Certification Level 4	March 19, 2024, in Jakarta	LSPP
		Bank Staff and Leadership School (SESPIBANK) Batch 78	April 22, 2024 – June 12, 2024, in Jakarta	LPPI
		Risk Management Certification Level 5	May 13, 2024, in Jakarta	LSPP
		The Strategic Role of the Audit Committee in Creating a Secure Cyber Environment	August 1, 2024, via Virtual Classroom	IKAI
		Expansive Leadership Program	September 5 – 6, 2024, in Bali	Mediatama Sinergi Emas
		Boardroom Bound : Accelerating Growth to Embrace The Future BTN	October 25, 2024, in Batam	LPPI
Rahmayati	(Ex Officio) Member	Compliance Excellence Edition January 2024 - Special Policies & Technical Guidelines for Accounting Activities	January 9, 2024, in Jakarta	BTN
		CHRO Masterclass – "Innovation Workplace: Work Less Produce More"	January 18, 2024, in Jakarta	BUMN School of Exellence (BSE)
		KBUMN Competency Deepening Program for BOD-1	January 27, 2024, in Jakarta	Transforma
		Compliance Excellence February 2024 Edition - Security & Digital Risk Awareness	February 13, 2024, in Jakarta	BTN

Name	Position	Types of Training and Development Materials Competency / Training	Time and place Implementation	Organizer
		Expert Talk Session Vice Minister of Foreign Affairs Mr. Pahala Mansury "Crafting Executive Savvy in Global Business Mindset"	February 21, 2024, in Jakarta	BTN
		Understanding Internal Regulations - BTN Internal Regulation Architecture	February 21, 2024, in Jakarta	BTN
		Compliance Excellence March 2024 Edition - Gratification Control Program and SMAP ISO 37001:2016 Policy (Managerial)	March 7, 2024, in Jakarta	BTN
		Internalization of IT Regulation Policy	March 19, 2024, in Jakarta	BTN
		Internalization of Respectful Workplace (RWP) 2024	March 26, 2024, in Jakarta	BTN
		Internalization of SLE Index Achievement 2024	April 1, 2024, in Jakarta	BTN
		Compliance Excellence April 2024 Edition - Government VA Services (Managerial)	April 17, 2024, in Jakarta	BTN
		Internalisasi Layanan BTN Cash Management	April 22, 2024, in Jakarta	BTN
		Internalization of Legal Clinic Podcast 2024	April 23, 2024, in Jakarta	BTN
		BTN Leadership Forum 2 - 2024	May 2 – 4, 2024, in Bali	McKinsey & PwC
		Compliance Excellence May 2024 Edition - Foreign Exchange Transaction BranchFX at Branch Offices (Managerial)	May 6, 2024, in Jakarta	BTN
		ASEAN Global Leadership Program - LSE London	May 11 – 18, 2024, in Barcelona, Spain	SRW&Co - IESE
		Internalization of New Grading System Bank BTN	May 13, 2024, in Jakarta	BTN
		Internalization of Commercial Credit Rescue and Settlement	May 20, 2024, in Jakarta	BTN
		CHRO Masterclass - Women Leadership in the New World of Work	May 22, 2024, in Jakarta	BTN
		Internalization of ESG (Environtmental, Social & Governance) Awareness	May 27, 2024, in Jakarta	BTN
		Compliance Excellence June 2024 Edition - Prohibition of Gambling Activities (Managerial)	June 6, 2024, in Jakarta	BTN
		Internalization of Transformation 2024	June 11, 2024, in Jakarta	BTN
		Internalization of Customer Data Management (CIF)	June 19, 2024, in Jakarta	BTN
		Compliance Excellence July 2024 Edition - Special Policy on Conflict of Interest Guidelines (Managerial)	July 4, 2024, in Jakarta	BTN
		Socialization of Umbrella Campaign Bale by BTN	July 17, 2024, in Jakarta	BTN
		Internalization of Corporate Loan Process	July 22, 2024, in Jakarta	BTN

Name	Position	Types of Training and Development Materials Competency / Training	Time and place Implementation	Organizer
		Internalization of Sahabat Transformation Episode 2	August 1, 2024 in Jakarta	BTN
		Internalization of IT, Digital & Cyber Risk Management 2024	August 3, 2024 in Jakarta	BTN
		Internalization of Public Information Disclosure (KIP)	August 4, 2024 in Jakarta	BTN
		Compliance Excellence August 2024 Edition - Implementation Procedures of Anti-Money Laundering, Prevention of Terrorism Financing, and Prevention of Mass Destruction Weapons Financing (Managerial)	August 4, 2024 in Jakarta	BTN
		CHRO Masterclass – "Future Strategic Workforce Planning for Sustainability"	August 5, 2024 in Jakarta	BUMN School of Excellence (BSE)
		Compliance Excellence September 2024 Edition - Data Privacy Awareness (Managerial)	September 2, 2024 in Jakarta	BTN
		Compliance Excellence October 2024 Edition - Bancassurance Product Marketing (Managerial)	September 7, 2024 in Jakarta	BTN
		Refreshment BTN Property 2024	October 14, 2024 in Jakarta	BTN
		Socialization of Digital Risk Awareness & Cyber Trend	October 17, 2024 in Jakarta	BTN
		Socialization of Easy Program in BTN Smart Residence	October 27, 2024 in Jakarta	BTN
		BSE Masterclass - Unlocking Opportunity for Indonesia Economy Growth 2025	November 14, 2024 in Jakarta	BUMN School of Excellence (BSE)

[1]) Term of office ended on March 4, 2024, as confirmed in the AGMS on March 6, 2024

The Remuneration and Nomination Committee's Meeting

Meeting is conducted by at least fulfilling the minimum requirement from the Board of Commissioners stipulated in the Company's Articles of Association. The meeting quorum is attended by minimum of 51% (fifty-one percent) of the Committee members either physically or proxied by other means. The meeting of the Remuneration and Nomination Committee is considered legitimate if attended by at least 51% (fifty-one percent) of total Committee members including 1 (one) Independent Commissioner and 1 (one) Independent Party.

If members of the Board of Commissioners are unable to physically attend the meeting, they may attend through the power of attorney, teleconferences, and other methods in accordance with the legal procedure and constitution.

Meeting is chaired by the Chairman of the Committee or a member appointed by the attending members if the Chairman of the Committee is not present. The decision of the Committee meeting is made based on deliberation and consensus. When consensus is not reached, decision-making is done under one man one vote principle.

The Committee meeting result shall be documented in the Minutes of Meeting signed by all Committee members present, welldocumented, and submitted to the Board of Commissioners. The Minutes contain information about time and place of the meeting, meeting agenda, topic of discussion, dissension (if any), and meeting decision. Dissenting opinion taking place during the meeting must be clearly recorded in the minute along with the underlying reasons.

The Committee is allowed to conduct special meeting if necessary. The Committee's meeting may invite the management or other parties as resource person. Meeting is held by invitation and with preceding approved agenda, and the meeting outcome has to be recorded in

the Minutes of Meeting. The original document shall be owned by the Committee, and the carbon copy is sent to the Secretary of the Board of Commissioners, and if necessary, can be shared to the absent participants.

The decision made in the meeting is declared legitimate and binding if attended by at least 51% (fifty-one percent) of the total Committee members including the Independent Commissioner and Executives who supervise human resources.

THE REMUNERATION AND NOMINATION COMMITTEE'S MEETING AGENDA

Throughout 2024, the meeting dates, agenda, and participants of the Remuneration and Nomination Committee meetings are as follows.

Table of Remuneration and Nomination Committee Meeting Agenda

No.	Meeting Date	Meeting Agenda	Meeting Participants	Description
1.	January 17, 2024	Proposal for Senior Executive Vice President (SEVP) Digital Business Candidates	• Chandra M. Hamzah • Iqbal Latanro • Armand B. Arief • Sentot A. Sentausa • Andin Hadiyanto • Herry Trisaputra Zuna • Himawan Arief Sugoto • Mohamad Yusuf Permana • Moch. Amin Nurdin • Rahmayati	Nomination
2.	February 21, 2024	1. Proposal for 2024 Remuneration of the Board of Directors and Board of Commissioners and Tantiem for the 2023 Fiscal Year of PT Bank Tabungan Negara (Persero) Tbk; 2. Proposal for Nominated Talent BoD-1 PT Bank Tabungan Negara (Persero) Tbk; and 3. Evaluation of Existing Nominated Talent BoD PT Bank Tabungan Negara (Persero) Tbk.	• Chandra M. Hamzah • Iqbal Latanro • Armand B. Arief • Sentot A. Sentausa • Andin Hadiyanto • Herry Trisaputra Zuna • Himawan Arief Sugoto • Mohamad Yusuf Permana • Moch. Amin Nurdin • Rahmayati	Remuneration and Nomination
3.	March 06, 2024	1. Composition of the Remuneration and Nomination Committee; 2. Performance Evaluation of Supporting Committees of the Board of Commissioners; and 3. Recommendation for Corporate Management Candidates	• Chandra M. Hamzah • Iqbal Latanro • Armand B. Arief • Sentot A. Sentausa • Andin Hadiyanto • Herry Trisaputra Zuna • Himawan Arief Sugoto • Moch. Amin Nurdin • Rahmayati	Remuneration and Nomination
4.	March 13, 2024	Composition of Supporting Committees of the Board of Commissioners	• Chandra M. Hamzah • Iqbal Latanro • Armand B. Arief • Sentot A. Sentausa • Andin Hadiyanto • Herry Trisaputra Zuna • Himawan Arief Sugoto • Moch. Amin Nurdin • Rahmayati	Nomination

No.	Meeting Date	Meeting Agenda	Meeting Participants	Description
5.	March 20, 2024	Changes in the Organizational Structure of the Head Office of PT Bank Tabungan Negara (Persero) Tbk	• Chandra M. Hamzah • Iqbal Latanro • Armand B. Arief • Sentot A. Sentausa • Adi Sulistyowati sebagai pengamat • Bambang Widjanarko sebagai pengamat • Andin Hadiyanto • Herry Trisaputra Zuna • Himawan Arief Sugoto • Moch. Amin Nurdin • Rahmayati	Nomination
6.	April 03, 2024	1. Update on the Recruitment Process for Audit Committee Members; and 2. Update on the Progress of Adjusting the Provisions for Income & Travel Facilities for the Board of Directors, Board of Commissioners, and SEVP	• Chandra M. Hamzah • Iqbal Latanro • Armand B. Arief • Sentot A. Sentausa • Adi Sulistyowati sebagai pengamat • Bambang Widjanarko sebagai pengamat • Andin Hadiyanto • Herry Trisaputra Zuna • Himawan Arief Sugoto • Moch. Amin Nurdin • Rahmayati	Remuneration and Nomination
7.	April 05, 2024	Determination of the 2024 Income for the Board of Directors and Board of Commissioners	• Chandra M. Hamzah • Iqbal Latanro • Armand B. Arief • Sentot A. Sentausa • Adi Sulistyowati sebagai pengamat • Bambang Widjanarko sebagai pengamat • Andin Hadiyanto • Herry Trisaputra Zuna • Himawan Arief Sugoto • Moch. Amin Nurdin • Rahmayati	Remuneration
8.	May 29, 2024	Termination of the Assignment of the Board of Commissioners' Secretariat Staff	• Chandra M. Hamzah • Iqbal Latanro • Armand B. Arief • Sentot A. Sentausa • Adi Sulistyowati sebagai pengamat • Bambang Widjanarko sebagai pengamat • Andin Hadiyanto • Herry Trisaputra Zuna • Himawan Arief Sugoto • Moch. Amin Nurdin • Rahmayati	Nomination
9.	July 31, 2024	Update on the Administrative Selection Results of Audit Committee Candidates	• Chandra M. Hamzah • Iqbal Latanro • Armand B. Arief • Sentot A. Sentausa • Adi Sulistyowati sebagai pengamat • Bambang Widjanarko sebagai pengamat • Andin Hadiyanto • Herry Trisaputra Zuna • Himawan Arief Sugoto • Moch. Amin Nurdin • Rahmayati	Nomination

No.	Meeting Date	Meeting Agenda	Meeting Participants	Description
10.	August 21, 2024	Interview Results of Audit Committee Candidates	• Chandra M. Hamzah • Iqbal Latanro • Armand B. Arief • Sentot A. Sentausa • Adi Sulistyowati sebagai pengamat • Bambang Widjanarko sebagai pengamat • Andin Hadiyanto • Herry Trisaputra Zuna • Himawan Arief Sugoto • Moch. Amin Nurdin • Rahmayati	Nomination
11.	September 4, 2024	1. Selection Results of Audit Committee Candidates; 2. Proposal for the 2024 Key Performance Indicators (KPI) for the Sharia Supervisory Board; and 3. Proposal for the 2024 Remuneration of the Sharia Supervisory Board	• Chandra M. Hamzah • Iqbal Latanro • Armand B. Arief • Sentot A. Sentausa • Adi Sulistyowati sebagai pengamat • Bambang Widjanarko sebagai pengamat • Andin Hadiyanto • Herry Trisaputra Zuna • Himawan Arief Sugoto • Moch. Amin Nurdin • Rahmayati	Remuneration and Nomination
12.	October 16, 2024	Composition of Supporting Committees of the Board of Commissioners	• Chandra M. Hamzah • Iqbal Latanro • Armand B. Arief • Sentot A. Sentausa • Adi Sulistyowati • Bambang Widjanarko • Andin Hadiyanto • Herry Trisaputra Zuna • Himawan Arief Sugoto • Moch. Amin Nurdin • Rahmayati	Nomination
13.	October 30, 2024	1. Determination of the 2024 Collegial KPI for the Board of Directors; and 2. Appointment of the Board of Commissioners' Secretariat Staff	• Chandra M. Hamzah • Iqbal Latanro • Armand B. Arief • Sentot A. Sentausa • Adi Sulistyowati • Bambang Widjanarko • Andin Hadiyanto • Herry Trisaputra Zuna • Himawan Arief Sugoto • Moch. Amin Nurdin • Rahmayati	Nomination
14.	November 13, 2024	1. 2025 Collegial KPI for the Board of Directors; 2. 2025 Collegial KPI for the Board of Commissioners; 3. Tantiem Budget in the 2025 Corporate Budget and Work Plan (RKAP); 4. Extension of the SEVP Operations Employment Contract; and 5. Evaluation of the Supporting Committees of the Board of Commissioner	• Chandra M. Hamzah • Iqbal Latanro • Armand B. Arief • Sentot A. Sentausa • Adi Sulistyowati • Bambang Widjanarko • Andin Hadiyanto • Herry Trisaputra Zuna • Himawan Arief Sugoto • Moch. Amin Nurdin • Rahmayati	Remuneration and Nomination

No.	Meeting Date	Meeting Agenda	Meeting Participants	Description
15.	November 29, 2024	Discussion on the Tantiem Budget for the Board of Directors and Board of Commissioners of PT Bank Tabungan Negara (Persero) Tbk in the 2025 Corporate Budget and Work Plan (RKAP)	• Chandra M. Hamzah • Iqbal Latanro • Armand B. Arief • Sentot A. Sentausa • Adi Sulistyowati • Bambang Widjanarko • Andin Hadiyanto • Herry Trisaputra Zuna • Himawan Arief Sugoto • Moch. Amin Nurdin • Rahmayati	Remuneration
16.	December 11, 2024	Discussion on the Proposed Nominated Talent BoD-1 of PT Bank Tabungan Negara (Persero) Tbk	• Chandra M. Hamzah • Armand B. Arief • Sentot A. Sentausa • Adi Sulistyowati • Bambang Widjanarko • Andin Hadiyanto • Herry Trisaputra Zuna • Himawan Arief Sugoto • Moch. Amin Nurdin	Nomination
17.	December 18, 2024	1. Follow-up Discussion on the Proposed Nominated Talent BoD-1 of PT Bank Tabungan Negara (Persero) Tbk; 2. Work Plan of the Board of Commissioners for 2025; 3. Work Plan of the Remuneration and Nomination Committee for 2025; 4. Guidelines and Rules of Procedure for the Board of Commissioners for 2024; and 5. Guidelines and Rules of Procedure for the Remuneration and Nomination Committee for 2024	• Chandra M. Hamzah • Iqbal Latanro • Armand B. Arief • Sentot A. Sentausa • Adi Sulistyowati • Bambang Widjanarko • Andin Hadiyanto • Herry Trisaputra Zuna • Himawan Arief Sugoto • Moch. Amin Nurdin	Remuneration and Nomination

FREQUENCY AND ATTENDANCE LEVEL OF REMUNERATION AND NOMINATION COMMITTEE MEETINGS

Meeting Frequency and Attendance Level of The Remuneration and Nomination Committee

No.	Name	Position	Meeting of Remuneration and Nomination Committee		
			Total and Percentage of Attendance		
			Total Meeting	Total Attendance	Persentase
1.	Chandra M. Hamzah	Chairman concurrently Member	17	17	100,00%
2.	Iqbal Latanro	Member	17	16	94,12%
3.	Armand B. Arief	Member	17	17	100,00%
4.	Sentot A. Sentausa	Member	17	17	100,00%
5.	Adi Sulistyowati	Member	6	6	100,00%
6.	Bambang Widjanarko	Member	6	6	100,00%
7.	Andin Hadiyanto	Member	17	17	100,00%
8.	Herry Trisaputra Zuna	Member	17	17	100,00%
9.	Himawan Arief Sugoto	Member	17	17	100,00%
10.	Mohamad Yusuf Permana	Member[1]	2	2	100,00%
11.	Moch. Amin Nurdin	Member	17	17	100,00%
12.	Rahmayati	Member	17	15	88,24%

[1]) Term of office ends on March 4, 2024 as confirmed at the GMS on March 6, 2024.

Work Plan and The Implementation of Duties of The Remuneration and Nomiination Committee In 2024

No.	Work Plan	Implementation
1.	Monitoring and Evaluating the Realization of the Board of Commissioners' Budget	Implemented
2.	Reviewing the Bank Business Plan (RBB), Corporate Work Plan and Budget (RKAP), Sustainable Finance Action Plan, and Self-Assessment on Bank-Related GCG	Implemented
3.	Recommendations and Assessment of Candidates for Members of the Board of Commissioners and Board of Directors in relation to the Company's GMS	Implemented
4.	Validation of Proposed Selected Talent BOD-1 BTN	Implemented
5.	Preparing the Board of Commissioners' Supervision Report on Human Resources	Implemented
6.	Organizing Meetings of the Remuneration and Nomination Committee	Implemented
7.	Determining remuneration, tantiem, and other incentives for the Board of Commissioners, Board of Directors, and Sharia Supervisory Board	Implemented
8.	Recommendation of Candidates for Head of Internal Audit Unit, Corporate Secretary, and Supporting Organs of the Board of Commissioners	Implemented
9.	Evaluation of Internal Policies Related to Human Resources	Implemented
10.	Reviewing the Collegial and Individual Key Performance Indicators of the Board of Commissioners and Board of Directors	Implemented
11.	Preparing the Board of Commissioners' Work Program	Implemented
12.	Preparing the Work Program of the Remuneration and Nomination Committee	Implemented
13.	Preparing the Realization Report of the Remuneration and Nomination Committee's Work Program	Implemented
14.	Attending competency development programs (training, seminars, workshops, certifications, etc.) and carrying out additional tasks assigned by the Committee Chairman and/or Board of Commissioners	Implemented
15.	Communicating with the Human Resources Unit	Implemented

Policy on the Succession Plan of The Board of Directors

In assisting the implementation of the duties of the Board of Commissioners regarding the succession of the President Director and other members of the Board of Directors in accordance with the Minister of State-Owned Enterprises Regulation No. 3 of 2023 concerning Organs and Human Resources of State-Owned Enterprises, the Remuneration and Nomination Committee implements the mechanism for the process of submitting nominated talent as candidates for BUMN Directors, namely:

1. **Selected Talent**
   Determination of Selected Talent BoD-1 is carried out through Directors' Meetings at each BUMN.
2. **Nominated Talent**
   Review and Determination of BoD-1 Nominated Talent by the respective BUMN Board of Commissioners through the Remuneration and Nomination Committee.
3. **Nominated Talent Cluster**
   Nominated Talent will be validated and calibrated by the Cluster Talent Committee (CTC) to become Eligible Talent.
4. **Eligible Talent**
   The Nominated Talent Cluster will undergo background checking by the Ministry of SOEs through the Deputy for Human Resources & Information Technology (SDMTI) KBUMN which will then become Eligible Talent
5. **Qualified Talent**
   Eligible Talent will undergo an Assessment at the Assessment Center appointed by the Ministry of BUMN and then become Qualified Talent.

The sources of Selected Talent and Nominated Talent from SOE are BOD-1 from SOE or SOE Subsidiaries which contribute significantly and have strategic value or BOD-1 from SOE or SOE Subsidiaries which is applied the same as SOE in accordance with the Law.

In preparing candidates or successors for the Company's Directors, various Company talent developments are carried out, especially BOD-1, BOD-2 and Women Talent and Millennial Talent to increase Readiness Level and prepare them to become Nominated Talent, including through programs:

1. *Expert Talk Session*
2. *Project Assignment*
3. *Cross mentoring*
4. *Roundtable Mentorship*
5. *SESPIBANK*
6. *Asesmen Orientation Day*

Meanwhile, in the process of searching for BOD-1 Talent from external sources in 2023, where they will also be prepared to become candidates for the Company's Directors (BOD) through a mechanism for developing and proposing nominated talents, the Company uses the services of a professional search company/ head hunter, namely PT Daya Dimensi Indonesia (DDI).

Risk Monitoring Committee

The Risk Monitoring Committee is a Supporting Organ formed by and responsible to the Board of Commissioners whose task is to assist the Board of Commissioners in evaluating the suitability of the Risk Management Policy with the implementation of that policy and monitoring as well as evaluating the implementation of the duties of the Risk Management Committee and the Risk Management Work Unit.

The purpose of establishing the Committee is to assist and support the implementation of the duties and responsibilities of the Board of Commissioners in ensuring the implementation of supervision and providing advice to the Board of Directors as well as compliance with statutory regulations and the Company's internal regulations related to:

1. Implementating a strong function of risk management supervision;
2. Developing a risk management culture in order to reduce the possibility of unethical banking practices occurring; and
3. Identified matters related to risk management that require the attention of the Board of Commissioners.

Legal Basis for Establishing the Risk Monitoring Committee

PersThe Company establishes Risk Monitoring Committee under the following legal bases:

1. OJK Regulation No 17 of 2023 dated September 14, 2023 concerning the Implementation of Governance for Commercial Banks.
2. OJK Circular Letter No. 13/SEOJK.03/2017 dated March 17, 2017 on the Implementation of Governance for General Bank.
3. Regulation of the Minister of State-Owned Enterprises No. PER-2/MBU/03/2023 dated March 24, 2023 concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises;
4. Regulation of the Minister of State-Owned Enterprises No. PER-3/MBU/03/2023 dated March 24, 2023 concerning Organs and Human Resources of State-Owned Enterprises;
5. Decree of the Deputy for Finance and Risk Management of the Ministry of State-Owned Enterprises No. SK-3/DKU. MBU/05/2023 concerning Technical Instructions for the Composition and Qualifications of Risk Management Organs within State-Owned Enterprises.
6. Company's Articles of Association.

Duties and Responsibilities of the Risk Monitoring Committee

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

1. Evaluating the alignment between the company's risk management policy and its implementation;
2. Monitoring and evaluating the duty accomplishment of the Risk Management Committee and working unit of risk management;
3. Gathering and assessing information, clarifications, documents, and/or reports related to the implementation of risk management;
4. Monitoring the adequacy of identification process, measurement, monitoring, control, and information system of risk management;
5. Encouraging the empowerment of the Company's risk management function;
6. Reporting to the Board of Commissioners about the possibility of Bank risk and proposing a variety of solutions
7. Conducting risk monitoring in the working unit which is closely related to risk-based decision-making and cooperating with risk management work unit.
8. Reviewing, evaluating, and/or providing recommendation on matters which require approval, consultation, or decision making by the Board of Commissioners in accordance with the Articles of Association, Working Relationship of the Board of Commissioners and Directors, and regulator's decree.
9. Performing other duties assigned by the Board of Commissioners within the relevant scope of duties of risk management.
10. The evaluation and monitoring activities mentioned above also cover the function of Sharia risk management in UUS (Sharia Business Units).
11. The results of the duties and responsibilities outlined above are used to provide recommendations to the Board of Commissioners.

CHARTER OF THE RISK MONITORING COMMITTEE

The Guidelines and Rules of Procedure for the Risk Monitoring Committee are prepared based on applicable laws and regulations and are periodically reviewed, with the most recent update based on the Board of Commissioners Decree No. 21/KOM/BTN/2024 dated December 18, 2024, concerning the Guidelines and Rules of Procedure for the Risk Monitoring Committee of PT Bank Tabungan Negara (Persero) Tbk, containing the following provisions:

Chapter I	General Provision	Article 1	Definition
		Article 2	Objectives
Chapter II	Duty, Responsibility, and Authority	Article 3	Duties and Responsibilities
		Article 4	Authority
Chapter III	Structure and Membership	Article 5	Composition and Structure
		Article 6	Membership Requirements
		Article 7	Term of Office
Chapter IV	Work Mechanism and Relationship	Article 8	Work Mechanism
		Article 9	Employment Relations
		Article 10	Supporting Personnel
Chapter IV	Work Mechanism and Relationship	Article 11	Work Plan and Budgeting
		Article 12	Committee Meetings
		Article 13	Report
		Article 14	Evaluation
Chapter VI	Competency Development and Income	Article 15	Competency Development
		Article 16	Income
Chapter VII	Others	Article 17	Closing

Authorities of the Risk Monitoring Committee

Daccomplishing its function, the Risk Management Committee holds the following authority to:

1. Carrying out activities in the implementation of the duties and responsibilities of the Risk Monitoring Committee.
2. Communicate with the Directors and/or Executives and internal Bank parties to obtain necessary information, clarifications, documents, and reports.
3. Obtain inputs and/or suggestions from the Bank's external parties related to the duty of the Risk Management Committee

Term of Office of the Risk Monitoring Committee

1. The term of office of the Committee members serving as a concurrent member of the Board of Commissioners automatically ends once their position as members of the Board of Commissioners ends;
2. The term of office of the Committee members who has not served as concurrent members of the Board of Commissioners is 3 (three) years at the maximum and is extendable to once for 2 (two) terms of office provided that the Board of Commissioners is still entitled to dismiss the respected Committee members at any time;
3. If a member of the Board of Commissioners holds a concurrent position as the chairman of the Committee releases his status as a member of the Board of Commissioners, the position of the Committee chairman must be replaced by another member of the Board of Commissioners within maximum of 30 (thirty) days.

Structure, Membership, and Expertise of the Risk Monitoring Committee

Table of the Risk Monitoring Committee's Structure, Membership, and Expertise

Name	Position	Description	Expertise	Period	Masa Jabatan		Basis of Appointment
					Start	End	
Armand B. Arief	Chairman and Member	Independent Commissioner	Banking, Risk Management, Business Management	Second	March 6, 2024	AGMS 2029	Decree of the Board of Commissioners Number 04/KOM/BTN/2024 dated March 17, 2024
Herry Trisaputra Zuna	Member	Commissioner	Macroeconomics, Management, Public Works, and Housing	First	March 17, 2024	AGMS 2027	Decree of the Board of Commissioners Number 04/KOM/BTN/2022 dated March 17, 2022
Himawan Arief Sugoto	Member	Commissioner	Management and Business, Risk Management, Finance, Land Affairs, and Spatial Planning	First	March 17, 2024	AGMS 2029	Decree of the Board of Commissioners Number 04/KOM/BTN/2022 dated March 17, 2022
Adi Sulistyowati	Member[1]	Independent Commissioner[2]	Banking, Risk Management, and Business Management	First	March 13, 2024	AGMS 2029	Decree of the Board of Commissioners Number 07/KOM/BTN/2024 dated March 13, 2024
Andin Hadiyanto	Member[3]	Commissioner	Banking, Compliance, Risk Management, and Business Administration	First	October 16, 2024	AGMS 2029	Decree of the Board of Commissioners Number 10/KOMP/BTN 2024 dated October 16, 2024
Ignace Widiatmoko	Member	Independent Party	Risk Management, Banking, Finance, Sharia Banking	Second	November 7, 2024	November 6, 2026	Board of Directors Decree Number 1064/DIR/2024 dated November 19, 2024
Pamuji Gesang Raharjo	Member	Independent Party	Banking, Risk Management, Finance, Sharia Banking	Second	November 30, 2024	November 29, 2026	Board of Directors Decision Number 1063/DIR/2024 dated November 19, 2024

[1]) Appointed as a member of the Risk Monitoring Committee on March 13, 2024
[2]) Effective based on the Fit and Proper Assessment Decision by OJK on October 7, 2024
[3]) Appointed as a member of the Risk Monitoring Committee on October 16, 2024

PROFILE OF THE RISK MONITORING COMMITTEE

The profile of the Risk Monitoring Committee as of December 31, 2024, is as follows.

Armand B. Arief **Monitoring Committee / Independent Commissioner**	Profile can be found in the Board of Commissioners' Profile section. His tenure as Chairman concurrent member of the Risk Monitoring Committee runs from November 27, 2019, to the 2024 AGMS (First Term) and continues from March 6, 2024, to the 2029 AGMS (Second Term).
Herry Trisaputra Zuna **Member of the Risk Monitoring Committee / Commissioner**	Profile can be found in the Board of Commissioners' Profile section. His tenure as a member of the Risk Monitoring Committee runs from March 2, 2022, to the 2027 AGMS (First Term).
Himawan Arief Sugoto **Member of the Risk Monitoring Committee / Commissioner**	Profile can be found in the Board of Commissioners' Profile section. His tenure as a member of the Risk Monitoring Committee runs from March 2, 2022, to the 2027 AGMS (First Term).
Adi Sulistyowati **Member of the Risk Monitoring Committee / Independent Commissioner**	Profile can be found in the Board of Commissioners' Profile section. Her tenure as a member of the Risk Monitoring Committee runs from March 6, 2024, to the 2029 AGMS (First Term).
Andin Hadiyanto **Member of the Risk Monitoring Committee / Commissioner**	Profile can be found in the Board of Commissioners' Profile section. His tenure as a member of the Risk Monitoring Committee runs from October 16, 2024, to the 2029 AGMS (First Term).



Ignace Widiatmoko

Member of the Risk Monitoring Committee/ Independent Party

Indonesia citizen,
Probolinggo, July 07 1960
64 years old as of December 2024,
domiciled dSouth Tangerang City Banten

Educational Background

- Bachelor of Corporate Economics, Diponegoro University, Semarang (1984)
- Master of Business Administration di Rutgers The State University (1995)

Certification

- Banking Risk Management Certification Level 7 according to KKNI (2024)
- Certification in Audit Committee Practices (CACP) from IKAI (2019)

Work Experience

- Vice President of Risk Management of Bank Mandiri (2007—2015).
- Commissioner of PT Resik Guna Maju (2015—2018).
- Managing Director PT Gedung Bank Exim (2015—2018).
- Risk Monitoring Committee and Audit Committee of Rabobank International Indonesia (2018—2020).
- Risk Monitoring Committee of Industrial Commercial of Bank of China Indonesia (2018—2021).
- Risk Monitoring Committee and Audit Committee of Bank Victoria International Tbk (2021).

Legal Basis for Appointment

- First Term: Board of Directors Decree No. 1002/DIR/2021 dated November 8, 2021, regarding the Appointment of Mr. Ignace Widiatmoko as a Member of the Risk Monitoring Committee
- Second Term: Board of Directors Decree No. 1064/DIR/2024 dated November 19, 2024, regarding the Extension of the Term of Office of the Risk Monitoring Committee Member at PT Bank Tabungan Negara (Persero) Tbk

Term of Office

- First Term with a Tenure from November 7, 2021, to November 6, 2024
- Second Term with a Tenure from November 7, 2024, to November 6, 2026

Concurrent Position

None



Pamuji Gesang Raharjo

Anggota Komite Pemantau Risiko/ Pihak Independen

Indonesia citizen,
Jakarta, April 10, 1968,
56 years old as of December 2024,
domiciled DKI Jakarta Central Jakarta City.

Educational Background

- Bachelor of Economics, University of Dr. Moestopo (1996)
- Master of Risk Management, University of Indonesia (2003)
- Doctor of Business and Management (Finance) Bogor Agricultural University (2014)

Certification

- Banking Risk Management Certification Level 7 according to KKNI (2024)
- Certified of Financial Consultant (CFC) Institute of Financial Consultant from IFC (2013)
- Certified of Investment Market and Banking Analyst (CIMBA) Investment Market and Banking Analyst Association (2014)

Work Experience

- General Manager of Risk Management Perum Pegadaian (2010 – 2011);
- Director of Risk Management Center Indonesia (2009 – 2011);
- Member of Risk Monitoring Committee of PT Bank Rakyat Indonesia (Persero) Tbk (2007 – 2010 and 2011 – 2016);
- Member of Audit Committee of PT Bank Rakyat Indonesia (Persero) Tbk (2016 – 2021);

Legal Basis for Appointment

- Board of Directors Decree No. 1067/DIR/2021 dated December 1, 2021, regarding the Appointment of Mr. Pamuji Gesang Raharjo as a Member of the Risk Monitoring Committee
- Board of Directors Decree No. 1063/DIR/2024 dated November 19, 2024, regarding the Extension of the Term of Office of the Risk Monitoring Committee Member at PT Bank Tabungan Negara (Persero) Tbk

Term of Office

- First Term with a Tenure from November 30, 2021, to November 29, 2024
- Second Term with a Tenure from November 30, 2024, to November 29, 2026

Concurrent Position

None

Independency of The Risk Monitoring Committee

Table of Risk Monitoring Committee's Independency

Aspect of Independency	Armand B. Arief	Herry Trisaputra Zuna	Himawan Arief Sugoto	Adi Sulistyowati	Andin Hadiyanto	Ignace Widiatmoko	Pamuji Gesang Raharjo
Having no financial Association with the Board of Commissioners and Directors	✓	✓	✓	✓	✓	✓	✓
Having no management relation in the company, subsidiary company, or affiliated company	✓	✓	✓	✓	✓	✓	✓
Has no ownership relationship shares in the company of 5% or more	✓	✓	✓	✓	✓	✓	✓
Not having familial relationship with the Board of Commissioners, Directors, and/or fellow members of the Risk Monitoring Committee	✓	✓	✓	✓	✓	✓	✓
Not serving as administrators of political parties, public officials and government	✓	✓	✓	✓	✓	✓	✓

Training and/or Competency Development of the Risk Monitoring Committee in 2024

Name	Position	Types of Training and Materials	Time and Place of Implementation	Organizer
Armand B. Arief	Chairman concurrently Member	Training and/or Competency Enhancement can be seen in the Training and/or Competency Enhancement section of the Board of Commissioners.		
Herry Trisaputra Zuna	Member	Training and/or Competency Enhancement can be seen in the Training and/or Competency Enhancement section of the Board of Commissioners.		
Himawan Arief Sugoto	Member	Training and/or Competency Enhancement can be seen in the Training and/or Competency Enhancement section of the Board of Commissioners.		
Adi Sulistyowati	Member	Training and/or Competency Enhancement can be seen in the Training and/or Competency Enhancement section of the Board of Commissioners.		
Andin Hadiyanto	Member	Training and/or Competency Enhancement can be seen in the Training and/or Competency Enhancement section of the Board of Commissioners.		
Ignace Widiatmoko	Member	Executive Risk Management Program Level 6	January 27, 2024 in Bogor	LPPI
		Webinar OJK "Strategies to Accelerate the Market Share of Islamic Finance	March 21, 2024 via Virtual Classroom	OJK Institute
		Seminar: Seizing Opportunities Amidst Uncertainty	February 23, 2024 via Virtual Classroom	LPPI
		Virtual Seminar "Paylater: A Financial Solution"	April 26, 2024 via Virtual Classroom	LPPI
		Ideas Talk "Capital Market & Financial Challenges"	April 26, 2024 via Virtual Classroom	OJK Institute
		Risk Management Certification Preparation KKNI Level 7	May 14, 2024 in Jakarta	PT Garda Multi Talenta
		How to Prevent Greenwashing in Sustainable Finance	May 16, 2024 via Virtual Classroom	OJK Institute
		Credit Growth Opportunities Post Credit Restructuring Policy Expiration	May 22, 2024 via Virtual Classroom	OJK Institute
		Building Trust for Insurance Industry Via Empathy in Claims Management	June 11, 2024 via Virtual Classroom	OJK Institute
		Navigating The Half-Year: Roadmap to Success	June 20, 2024 via Virtual Classroom	OJK Institute
		Risk Management Certification KKNI Level 6	March 4, 2024 in Jakarta	LSPP
		Risk Management Certification KKNI Level 7	June 3, 2024 in Jakarta	LSPP
		How to Mitigate Transition and Physical Risks in the Financial Sector	July 4, 2024 via Virtual Classroom	OJK Institute
		The Role of Digital Technology in Enhancing Accounting Practices	July 11, 2024 via Virtual Classroom	OJK Institute

Name	Position	Types of Training and Materials	Time and Place of Implementation	Organizer
		POJK 5/2024: Strengthening Banking Foundations Amidst Global Volatility	June 26, 2024 via Virtual Classroom	LPPI
		The Strategic Role of the Audit Committee in Establishing a Secure Cyber Environment	August 1, 2024 via Virtual Classroom	IKAI
		Spiritual-Based Leadership Development: A Holistic Approach for Business Growth and Sustainability	August 22, 2024 via Virtual Classroom	OJK Institute
		Asian Confederation of Institutes of Internal Auditors (ACIIA) Regional Conference: Purposeful Impact	August 28, 2024 Until August 29, 2024 in Bali	IIA Indonesia
		The Future of Data Analytics in the Financial Industry: Trends and Innovations	September 12, 2024 via Virtual Classroom	OJK Institute
		Boardroom Bound : Accelerating Growth to Embrace The Future BTN	October 25, 2024 in Batam	LPPI
		Risk Beyond 2024 on Enterprise Risk Management	December 5, 2024 to December 6, 2024 in Bali	ERMA
Pamuji Gesang Raharjo		Executive Risk Management Program Jenjang 5	Januari 27, 2024 in Bogor	LPPI
		Risk Management Certification Preparation KKNI Level 6	May 6, 2024 in Jakarta	LPPI
		Risk Management Certification Preparation KKNI Level 7	May 14, 2024 in Jakarta	PT Garda Multi Talenta
		Risk Management Certification KKNI Level 5	March 14, 2024 in Jakarta	LSPP
		Risk Management Certification KKNI Level 6	May 13, 2024 in Jakarta	LSPP
		Risk Management Certification KKNI Level 7	June 3, 2024 in Jakarta	LSPP
		Economic and Financial Outlook for 2024	February 22, 2024 via Virtual Classroom	OJK Institute
		Cyber Attack Prevention Strategies	February 29, 2024 via Virtual Classroom	OJK Institute
		ESG Integration in Risk Management: A Practical Approach	March 13, 2024 via Virtual Classroom	RISKHub International
		Financial Services System (SJK) Development Strategy Through Strengthening Islamic Banking and Market Conduct	March 13, 2024 via Virtual Classroom	OJK Institute
		Opportunities and Challenges of Digital Assets in Indonesia	March 14, 2024 via Virtual Classroom	OJK Institute
		Strengthening Integrity and Competency in Risk Management to Achieve Alignment and Commitment in Risk Prevention Quality Improvement	March 15, 2024 via Virtual Classroom	Indonesia Risk Management Professional Association (IRMAPA)

Name	Position	Types of Training and Materials	Time and Place of Implementation	Organizer
		Financial Modelling untuk Merger & Akuisisi	March 16, 2024 via Virtual Classroom	Ruang Seminar – PT Sarijan International Digital School & Training Indonesia
		Strategies to Accelerate the Market Share of Islamic Finance	March 21, 2024 via Virtual Classroom	OJK Institute
		Islamic Finance & Banking Industry Exploration: Emerging Opportunities in Modern Economic	March 22, 2024 via Virtual Classroom	PT Bursa Komoditi & Derivative Indonesia (ICDX)
		The Role of Taxonomy for Sustainable Finance (TKBI) in Driving Energy Transition Toward Indonesia's Net Zero Emission	March 28, 2024 via Virtual Classroom	OJK Institute
		Financial Services System (SJK) Development Prospects Through Open Finance and NIM BOPO Banking	April 23, 2024 via Virtual Classroom	OJK Institute
		Simulation on Filling Out Stress-Test Work Papers and Determining Contingency Plan Steps	May 21, 2024 via Virtual Classroom	PROXSIS Consulting GRC Indonesia
		Credit Growth Opportunities Post Credit Restructuring Policy Expiration	May 22, 2024 via Virtual Classroom	OJK Institute
		Opportunities and Challenges of Personal Data Protection in Digital Transactions	May 30, 2024 via Virtual Classroom	OJK Institute
		The Strategic Role of the Audit Committee in Establishing a Secure Cyber Environment	August 1, 2024 via Virtual Classroom	IKAI
		Expansive Leadership Program	September 5-6, 2024 in Bali	Mediatama Sinergi Emas
		Boardroom Bound : Accelerating Growth to Embrace The Future BTN	October 25, 2024 in Batam	LPPI
		Risk Beyond 2024 on Enterprise Risk Management	December 5-6, 2024 in Bali	ERMA

Risk Monitoring Committee Meeting

The Risk Monitoring Committee meetings are held as needed by the Company, at least once (1) a month. The meetings are conducted if attended by the majority of the committee members.

If members of the Risk Monitoring Committee are unable to physically attend the meeting, they may attend through the power of attorney, teleconferences technology, and other means in accordance with the legal procedure and constitution.

The meetings are chaired by the Committee Chair, or in the event of the Chair's absence, the meeting is led by a committee member appointed by the attending members. Decisions in the committee meetings are made based on deliberation and consensus. If consensus is not reached, decisions are made by majority vote.

The Committee meeting result must be in writing in the form of the Minutes of Meeting signed by all Committee attendees, and shall be well-documented, and submitted to the Board of Commissioners. The Minutes of Meeting includes information about time and place of the meeting, meeting agenda, topic of discussion, dissension (if any), and meeting decision. Dissenting opinion occurring during the meeting must be clearly recorded in the Minutes, along with the underlying reasons.

The Risk Monitoring Committee is allowed to conduct special meeting if necessary. Committee meeting may invite the management or other parties as resource person. The meeting is held by invitation and approved agenda, and the meeting outcome has to be recorded in the Minutes of Meeting. The original document must be possessed by the Committee, and the carbon copy shall be sent to the Secretary of the Board of Commissioners and, if necessary, can be shared to the absent invitees.

THE RISK MONITORING COMMITTEE'S MEETING AGENDA

Throughout 2024, the Risk Monitoring Committee has held 61 (sixty-one) meetings, thereby fulfilling the requirement of holding at least one (1) meeting per month. The meeting agenda includes the execution of the committee's duties and responsibilities as follows:

Table of the Risk Monitoring Committee's Meeting Agenda

No.	Meeting Date	Meeting Agenda	Meeting Participants
1.	January 08, 2024	Review of the Credit Committee Meeting Decision Report for the November 2023 Period	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Ignace Widiatmoko • Pamuji Gesang Raharjo
2.	January 10, 2024	Recommendation on Updating the General Policy on Information Technology, Data Management, and Digitalization	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Ignace Widiatmoko • Pamuji Gesang Raharjo
3.	January 17, 2024	Preparation of the Performance Realization Report of the Risk Monitoring Committee for Q4 2023 and the Year 2023	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Ignace Widiatmoko • Pamuji Gesang Raharjo
4.	January 18, 2024	Preparation of the Self-Assessment on the Implementation of Bank Governance for the Period of January to December 2023 - Risk Monitoring Committee Section	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Ignace Widiatmoko • Pamuji Gesang Raharjo
5.	January 22, 2024	Review of the Credit Committee Meeting Decision Report for the December 2023 Period	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Ignace Widiatmoko • Pamuji Gesang Raharjo
6.	January 30, 2024	Review of the Compliance Report until Q4 or Semester II of 2023	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Ignace Widiatmoko • Pamuji Gesang Raharjo
7.	February 12, 2024	Analysis of the Efficiency Ratio of Operating Expenses to Operating Income (BOPO) for 2023	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Ignace Widiatmoko • Pamuji Gesang Raharjo
8.	February 19, 2024	Recommendation on the Approval of a Logo Change	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Ignace Widiatmoko • Pamuji Gesang Raharjo
9.	February 21, 2024	Review of the Risk Profile, Minimum Capital Adequacy Requirement (KPMM), and Bank Soundness Level (TKB) as of December 2023	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Ignace Widiatmoko • Pamuji Gesang Raharjo

No.	Meeting Date	Meeting Agenda	Meeting Participants
10.	February 26, 2024	Review of the Credit Committee Meeting Decision Report for the January 2024 Period	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Ignace Widiatmoko • Pamuji Gesang Raharjo
11.	February 27, 2024	Recommendation on Updating the General Policy on Operations and Supporting Functions and Response to the General Policy on Environmental, Social, and Governance (ESG)	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Ignace Widiatmoko • Pamuji Gesang Raharjo
12.	March 06, 2024	Review of the Self-Assessment Report on the Implementation of Good Corporate Governance (GCG) for the Sharia Business Unit in 2023	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Ignace Widiatmoko • Pamuji Gesang Raharjo
13.	April 29, 2024	Review of the Credit Committee Meeting Decision Report for the March 2024 Period	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo
14.	May 06, 2024	Review of the Compliance Report until Q1 2024	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo
15.	May 20, 2024	Review of the Risk Profile as of March 2024	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo
16.	May 27, 2024	Review of the Credit Committee Meeting Decision Report for the April 2024 Period	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo
17.	May 29, 2024	Preparation of the Performance Realization Report of the Risk Monitoring Committee for Q1 2024	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo
18.	June 11, 2024	Recommendation on Legal Actions Regarding Alleged Violations of Banking Regulations and Other Laws	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo
19.	June 12, 2024	Recommendation on the Islamic Financing Restructuring Report	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo
20.	June 18, 2024	Review of the Efficiency Ratio (BOPO and CIR Ratios)	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo

No.	Meeting Date	Meeting Agenda	Meeting Participants
21.	June 19, 2024	Monitoring of Risk Appetite and Risk Tolerance until May 2024	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo
22.	June 25, 2024	Recommendation on the Proposed Amendment to the Bank Business Plan (RBB) 2024–2026 and Changes to the Company's Work & Budget Plan (RKAP) for 2024	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo
23.	June 26, 2024	Review of Affiliated Transactions	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo
24.	July 04, 2024	Review of the Credit Committee Meeting Decision Report for the May 2024 Period	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo
25.	July 08, 2024	Recommendation on the Proposed Criteria for Long-Term Procurement of Goods and/or Services	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo
26.	July 12, 2024	Recommendation on the Islamic Financing Restructuring Report	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo
27.	July 15, 2024	Recommendation on Information Disclosure Related to Cyber Attack Allegations	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo
28.	July 17, 2024	Study on the Principle Request for Credit or Financing to Executive Officers	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo
29.	July 22, 2024	Recommendation on Updating the Special Policy on Cooperation Procedures with Partners	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo
30.	July 24, 2024	Review of the Credit Committee Meeting Decision Report for the June 2024 Period	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo

No.	Meeting Date	Meeting Agenda	Meeting Participants
31.	July 25, 2024	Preparation of the Performance Realization Report of the Risk Monitoring Committee for Q2 2024	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo
32.	July 30, 2024	Discussion on Portfolio and Strategy for Achieving Retail Savings Product Targets	• Armand B. Arief • Ignace Widiatmoko • Pamuji Gesang Raharjo
33.	August 05, 2024	Review of the Compliance Report until Q1 or Semester I of 2024 and Study on the Principle Request for Credit or Financing to Executive Officers	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo
34.	August 07, 2024	Review of the Risk Profile, Minimum Capital Adequacy Requirement (KPMM), and Bank Soundness Level (TKB) as of June 2024	• Armand B. Arief • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo
35.	August 19, 2024	Recommendation on the Management Review Meeting Report for ISO 37001:2016 Anti-Bribery Management System (SMAP)	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo
36.	August 21, 2024	Study on the Principle Request for Credit or Financing to Executive Officers	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo
37.	August 26, 2024	Review of the Credit Committee Meeting Decision Report for the July 2024 Period	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo
38.	September 02, 2024	Review of the Proposed Adjustment of the Threshold for Risk Appetite and Risk Tolerance for 2024	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo
39.	September 09, 2024	Recommendation on the Preparation of the Key Risk Report	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo
40.	September 23, 2024	Recommendation on the Draft Long-Term Corporate Plan (RJPP) for 2025–2029	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo
41.	October 01, 2024	Review of the Credit Committee Meeting Decision Report for the August 2024 Period	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo

No.	Meeting Date	Meeting Agenda	Meeting Participants
42.	October 02, 2024	Progress on ESG Rating Assessment and Risk Maturity Index	• Armand B. Arief • Himawan Arief Sugoto • Adi Sulistyowati sebagai pengamat • Ignace Widiatmoko • Pamuji Gesang Raharjo
43.	October 07, 2024	Preparation of the Performance Realization Report of the Risk Monitoring Committee for Q3 2024	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati • Ignace Widiatmoko • Pamuji Gesang Raharjo
44.	October 15, 2024	Study on the Principle Request for Credit or Financing to Executive Officers	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati • Ignace Widiatmoko • Pamuji Gesang Raharjo
45.	October 16, 2024	Monitoring of Risk Appetite and Risk Tolerance until September 2024	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati • Ignace Widiatmoko • Pamuji Gesang Raharjo
46.	October 18, 2024	Review of the Credit Committee Meeting Decision Reports for August and September 2024	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati • Andin Hadiyanto • Ignace Widiatmoko • Pamuji Gesang Raharjo
47.	October 21, 2024	Recommendation on Support for the Establishment of a Subsidiary as Part of the Plan for the Spin-Off of the Sharia Business Unit	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati • Andin Hadiyanto • Ignace Widiatmoko • Pamuji Gesang Raharjo
48.	October 23, 2024	Study on the Principle Request for Credit or Financing to Executive Officers	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati • Andin Hadiyanto • Ignace Widiatmoko • Pamuji Gesang Raharjo
49.	October 28, 2024	Review of the Compliance Report until Q3 2024	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati • Andin Hadiyanto • Ignace Widiatmoko • Pamuji Gesang Raharjo
50.	November 18, 2024	Review of the Credit Committee Meeting Decision Report for the October 2024 Period	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati • Andin Hadiyanto • Ignace Widiatmoko • Pamuji Gesang Raharjo

No.	Meeting Date	Meeting Agenda	Meeting Participants
51.	November 22, 2024	Discussion on the Risk Profile Report until Q3 2024 and the Fraud Prevention Strategy Report until Q3 2024	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati • Ignace Widiatmoko • Pamuji Gesang Raharjo
52.	November 25, 2024	Review of the Update on the Recovery Action Plan, Resolution Plan Update, and Sustainable Finance Action Plan	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati • Andin Hadiyanto • Ignace Widiatmoko • Pamuji Gesang Raharjo
53.	November 26, 2024	Recommendations on: • Updating the General Policy on Subsidiary Management and the Sharia Business Unit • Updating the General Policy on Legal, Compliance, AML, CFT, and PFWMD, as well as Corporate Governance	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati • Andin Hadiyanto • Ignace Widiatmoko • Pamuji Gesang Raharjo
54.	November 28, 2024	Study on the Principle Request for Credit or Financing to Executive Officers	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati • Andin Hadiyanto • Ignace Widiatmoko • Pamuji Gesang Raharjo
55.	December 04, 2024	• Recommendation on the Concept of Business Ethics and Conduct Guidelines • Update of the Guidelines and Work Rules of the Risk Monitoring Committee • Preparation of the Work Program of the Risk Monitoring Committee for 2025	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati • Andin Hadiyanto • Ignace Widiatmoko • Pamuji Gesang Raharjo
56.	December 09, 2024	Recommendation on Updating the General Policy on Treasury, Funding, and Product Delivery, and Recommendation on Adjusting the Threshold for Risk Appetite and Risk Tolerance for 2024	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati • Andin Hadiyanto • Ignace Widiatmoko • Pamuji Gesang Raharjo
57.	December 11, 2024	Discussion on the Strategy of the Directorate of Operations & Customer Experience	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati • Ignace Widiatmoko • Pamuji Gesang Raharjo
58.	December 13, 2024	Recommendation on the Management Review Meeting Report for ISO 37301:2021 Compliance Management System	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati • Andin Hadiyanto • Ignace Widiatmoko • Pamuji Gesang Raharjo
59.	December 16, 2024	Recommendations on: • Updating the General Policy on Risk Management • Updating the General Policy on Bank Lending or Financing • Updating the General Policy on Operations and Supporting Functions • Updating the General Policy on Information Technology, Data Management, and Digitalization Updating the Special Policy on the Implementation of Anti-Money Laundering (AML), Counter-Terrorism Financing (CFT), and Prevention of Financial Crimes (PFWMD) Programs	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati • Andin Hadiyanto • Ignace Widiatmoko • Pamuji Gesang Raharjo

No.	Meeting Date	Meeting Agenda	Meeting Participants
60.	December 18, 2024	Study on the Principle Request for Credit or Financing to Executive Officers	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati • Andin Hadiyanto • Ignace Widiatmoko • Pamuji Gesang Raharjo
61.	December 20, 2024	Study on the Principle Request for Credit or Financing to Executive Officers	• Armand B. Arief • Herry Trisaputra Zuna • Himawan Arief Sugoto • Adi Sulistyowati • Andin Hadiyanto • Ignace Widiatmoko • Pamuji Gesang Raharjo

FREQUENCY AND ATTENDANCE LEVEL OF RISK MONITORING COMMITTEE MEETINGS

Risk Monitoring Committee Meeting Attendance Rate Table

Name	Position	Risk Monitoring Committee Meeting		
		Total Meeting	Total Attendance	Percentage
Armand B. Arief	Chairman concurrently Member	61	61	100.00%
Herry Trisaputra Zuna	Member	61	58	95.08%
Himawan Arief Sugoto	Member	61	60	98.36%
Adi Sulistyowati*	Member	19	19	100.00%
Andin Hadiyanto**	Member	17	14	82.35%
Ignace Widiatmoko	Member	61	61	100.00%
Pamuji Gesang Raharjo	Member	61	61	100.00%

* Appointed as member of Risk Monitoring Committee on March 13, 2024
** Appointed as member of Risk Monitoring Committee on October 16, 2024

Work Plan and the Implementation of Duties of the Risk Monitoring Committee of 2024

In 2024, the Committee has implemented the work program that was prepared in the previous year. Most of the work programs have been implemented, but there are several work programs that have not been implemented because there is no urgent need and/or initiation from the relevant work units has been delayed. Details of the work program and implementation realization are presented as follows:

No.		Work Plan	Implementation
1.	REGULAR		
	a.	Review of the Risk Profile Report	Implemented
	b.	Review of the Bank's Soundness Level Report	Implemented
	c.	*Submission of review and input related to Risk Appetite and Risk Tolerance*	Implemented
	d.	Review of the Bank Business Plan (RBB) and the Company's Work & Budget Plan (RKAP)	Implemented

No.		Work Plan	Implementation
	e.	Review of the Sustainable Finance Action Plan (RAKB)	Implemented
	f.	Review of the Updated Recovery Plan	Implemented
	g.	Review of the Preparation of the Resolution Plan Year	Implemented
	h.	Reassessment of the Risk Management Policy Guidelines (PKMR)	Implemented
	i.	Review of the Compliance Report	Implemented
	j.	Submission of the Self-Assessment Report on the Implementation of Bank Governance	Implemented
	k.	Preparation of the Risk Monitoring Committee Report	Implemented
	l.	Preparation of the Risk Monitoring Committee Work Program	Implemented
2.	**NONREGULAR**		
	a.	Strategic Initiatives and New Regulations	
		General Policy on Environmental, Social, and Governance (ESG)	Implemented
	b.	Recommendation of General and Specific Policies:	
		Update of General Policies, Specific Policies, and/or Technical Guidelines that need attention and/or approval from the Board of Commissioners	Implemented
3.	**SUPERVISION OF COMMITTEE RECOMMENDATIONS IMPLEMENTATION**		
		Communicating with SKMR	Implemented
4.	**DISCUSSION OF TOP RISKS IN THE RISK-TAKING UNIT**		
		Requesting and evaluating data/information/clarification from SKMR and related Work Units	Implemented
5.	**SPECIAL AND OTHER DUTIES**		
	a.	Risk Monitoring Committee meetings (at least once a month)	Implemented
	b.	Other duties as assigned by the Committee Chairperson, Board of Commissioners, or Members of the Board of Commissioners	Implemented

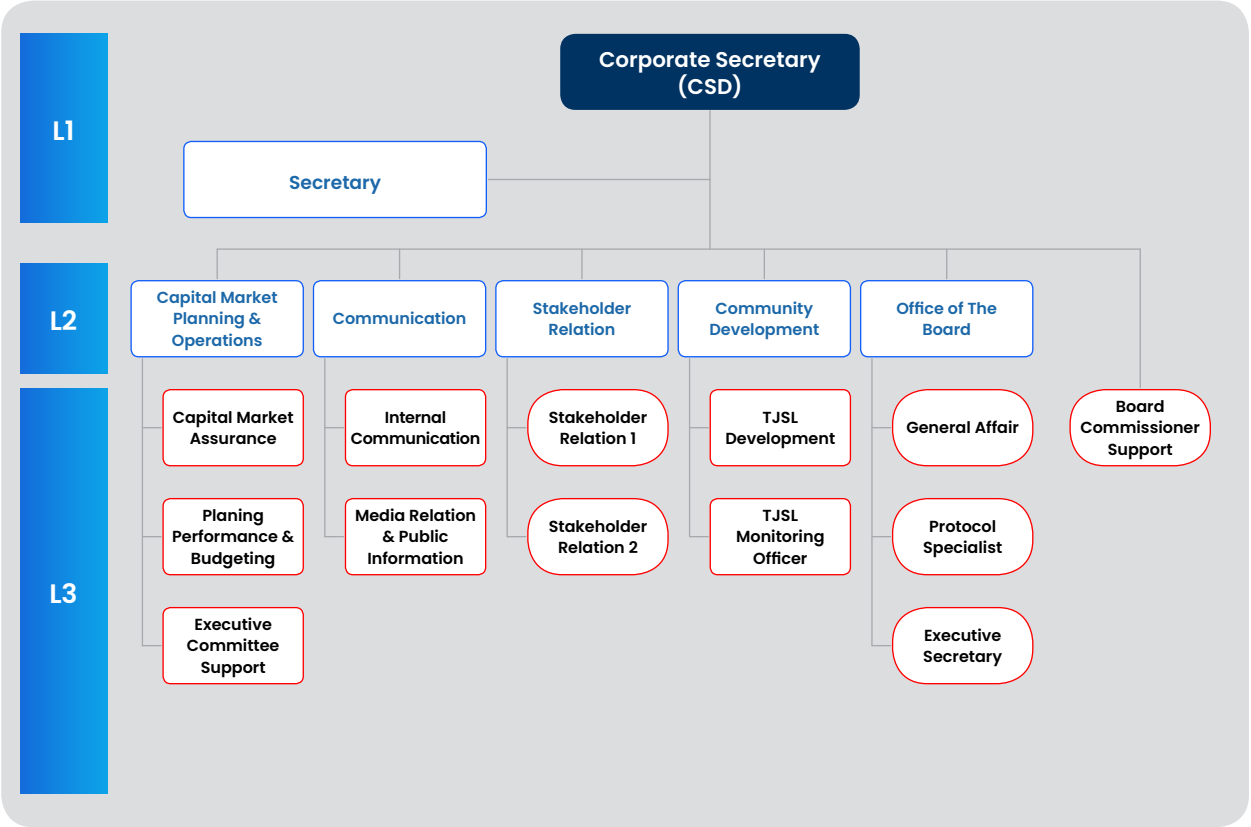
Organs and Committees Under the Directors

Corporate Secretary

As a supporting organ to the Board of Directors in the implementation of good corporate governance, the Corporate Secretary has a significant role in ensuring that the Company has been following the regulations related to the disclosure requirements in line with the implementation of GCG principles. The Corporate Secretary has to perform corporate's responsibilities regarding the disclosure of materials and relevant information to the stakeholders. The Corporate Secretary also provides relevant information to the Board of Directors and Board of Commissioners, organizes the information, coordinates, and documents the meeting of the Board of Directors, the joint meeting of the Board of Directors and the Board of Commissioners, GMS, and other activities with stakeholders.

The Structure of the Corporate Secretary

The Corporate Secretary is managed by the Corporate Secretary Division (CSD) which is led by the Corporate Secretary Division Head (dhi. Corporate Secretary), and is responsible to the President Director in carrying out his/her duties. The Corporate Secretary is assisted by a Senior Manager/Assistant Vice President who is responsible for each work unit including Planning & Operations, Reporting & Community Development, and Communication.



Functions, Duties, and Responsibilities of the Corporate Secretary

In carrying out its duties and responsibilities, the Corporate Secretary also refers to the OJK Regulation No. 35/POJK.04/2014, dated December 8, 2014, concerning Corporate Secretary of Issuers or Public Companies. Based on these regulations, the Corporate Secretary shall perform its duties and responsibilities, which include:

1. Following-up the progress of the capital market, particularly in terms of the laws and regulations applied in the capital market sector.
2. Providing input to the Company's Directors and Board of Commissioners for Complying with the provisions of laws and regulations in the capital market sector.
3. Assisting the Board of Directors and Board of Commissioners in the implementation of the corporate governance which includes:
   a. Disclosure of information to the public, including the availability of information on the issuer or Company's websites.
   b. Report submission to the Financial Services Authority on schedule.
   c. Conducting and documenting the General Meeting of the Shareholders (GMS).
   d. Conducting and documenting meetings of the Board Directors and or Board of Commissioners.
   e. Conducting orientation programs for the Board of Directors and/or the Board of Commissioners.
4. As a communicator between the Company and shareholders of issuers or public companies, Financial Services Authority, and other stakeholders.

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Corporate Secretary Profile



Ramon Armando
Corporate Secretary

Indonesia citizen,
50 years as of December 2024,
domiciled Jakarta, Indonesia.

Educational Background
- Social Sciences/Administration from the University of Indonesia (1996)
- Master (S2) in Commerce from The University of Sydney in 1998

Certification
Level 5 Risk Management Competency

Work Experience
Starting his career at PT Bank Tabungan Negara (Persero) Tbk in 2020 as Marketing Communication Division Head and concurrently serving as Digital Channel Division Head. He previously served at PT Bank Mandiri (Persero) Tbk as DH Retail Marketing (2015), DH Corporate Communication (2010), and Regional Card Manager Bandung (2009).

Legal Basis for Appointment
Directors' Decree Number 231/DIR/2023 dated April 14 2023

Corporate Secretary Competency Development Program

Types of Training and Development Materials Competency / Training	Time and place	Penyelenggara
Compliance Excellence January 2024 Edition - Special Policies & Technical Guidelines for Accounting Activities	Jakarta, January 09, 2024	PT Bank Tabungan Negara (Persero) Tbk
Competency Deepening Program KBUMN for BOD-1	Jakarta, January 27, 2024	Transforma
Compliance Excellence February 2024 Edition - Security & Digital Risk Awareness	Jakarta, February 13, 2024	PT Bank Tabungan Negara (Persero), Tbk
Expert Talk Session "Crafting Executive Savvy in Global Business Mindset	Jakarta, February 21, 2024	PT Bank Tabungan Negara (Persero) Tbk
Understanding Internal Regulations - BTN Internal Regulation Architecture	Jakarta, February 24, 2024	PT Bank Tabungan Negara (Persero) Tbk
Compliance Excellence March 2024 Edition - Gratification Control Program and SMAP ISO 37001-2016 Policy (Managerial)	Jakarta. March 07, 2024	PT Bank Tabungan Negara (Persero) Tbk
Internalization of IT Regulation Policy	Jakarta, March 19, 2024	PT Bank Tabungan Negara (Persero0 Tbk
Internalization of Respectful Workplace (RWP) 2024	Jakarta, March 26, 2024	PT Bank Tabungan Negara (Persero) Tbk
Internalization of SLE Index Achievement 2024	Jakarta, April 01, 2024	PT Bank Tabungan Negara (Persero) Tbk
Compliance Excellence April 2024 Edition - Government VA Report (Managerial)	Jakarta, April 17, 2024	PT Bank Tabungan Negara (Persero) Tbk
Internalization of BTN Cash Management Services	Jakarta, April 22, 2024	PT Bank Tabungan Negara (Persero) Tbk
Internalization of Legal Clinic Podcast 2024	Jakarta, April 23, 2024	PT Bank Tabungan Negara (Persero) Tbk
BTN Leadership Forum 2 - 2024	Bali, May 02 - 04, 2024	McKinsey & PwC
Compliance Excellence May 2024 Edition - Foreign Exchange Transactions Branch FX at Branch Offices (Managerial)	Jakarta, May 06, 2024	PT Bank Tabungan Negara (Persero) Tbk
Internalization of New Grading System Bank BTN	Jakarta, May 13, 2024	PT Bank Tabungan Negara (Persero) Tbk

Types of Training and Development Materials Competency / Training	Time and place	Penyelenggara
Internalization of Commercial Loan Rescue and Resolution	Jakarta, May 20, 2024	PT Bank Tabungan Negara (Persero) Tbk
Internalization of ESG (Environment, Social & Governance) Awareness	Jakarta, May 27, 2024	PT Bank Tabungan Negara (Persero) Tbk
Banking Risk Management Certification Level 5	Jakarta, May 29, 2024	Lembaga Sertifikasi Profesi Badan Sertifikasi Manajemen Risiko
Compliance Excellence June 2024 Edition - Prohibition of Gambling Activities (Managerial)	Jakarta, June 06, 2024	PT Bank Tabungan Negara (Persero) Tbk
Internalization of 2024 Transformation	Jakarta, June 11, 2024	PT Bank Tabungan Negara (Persero) Tbk
Internalisasi Pengelolaan Data Nasabah (CIF)	Jakarta, June 19, 2024	PT Bank Tabungan Negara (Persero) Tbk
Compliance Excellence July 2024 Edition - Special Policy on Conflict of Interest Guidelines (Managerial)	Jakarta, July 04, 2024	PT Bank Tabungan Negara (Persero) Tbk
Socialization of Umbrella Campaign Bale by BTN	Jakarta, July 17, 2024	PT Bank Tabungan Negara (Persero) Tbk
Risk Management Refreshment KKNI Level 5 E-Learning Method	Jakarta, July 19, 2024	PT Bank Tabungan Negara (Persero) Tbk
Internalization of Corporate Loan Process (Corporate Loan)	Jakarta, July 22, 2024	PT Bank Tabungan Negara (Persero) Tbk
Socialization of Profitability Measurement System	Jakarta, August 01, 2024	PT Bank Tabungan Negara (Persero) Tbk
Internalization of Sahabat Transformasi Episode 2	Jakarta, August 03, 2024	PT Bank Tabungan Negara (Persero) Tbk
Internalization of IT, Digital & Cyber Risk Management 2024	Jakarta, August 05, 2024	PT Bank Tabungan Negara (Persero) Tbk
Internalization of Public Information Disclosure (KIP) in the framework of Corporate Secretary governance	Jakarta, August 06, 2024	PT Bank Tabungan Negara (Persero) Tbk
Compliance Excellence August 2024 Edition - Procedures for Implementing Anti-Money Laundering, Counter-Terrorism Financing, and Prevention of the Financing of Weapons of Mass Destruction Programs (AML, CFT, and PFWMD) (Managerial)	Jakarta, August 09, 2024	PT Bank Tabungan Negara (Persero) Tbk
BTN Smart Residence Refreshment	Jakarta, September 02, 2024	PT Bank Tabungan Negara (Persero) Tbk
Compliance Excellence September 2024 Edition - Data Privacy Awareness (Managerial)	Jakarta, September 08, 2024	PT Bank Tabungan Negara (Persero) Tbk
Compliance Excellence October 2024 Edition - Bancassurance Product Marketing (Managerial)	Jakarta, October 07, 2024	PT Bank Tabungan Negara (Persero) Tbk
BTN Property 2024 Refreshment	Jakarta, October 08, 2024	PT Bank Tabungan Negara (Persero) Tbk
Socialization of Digital Risk Awareness & Cyber Trend	Jakarta, October 10, 2024	PT Bank Tabungan Negara (Persero) Tbk
Socialization of Easy in BTN Smart Residence Program	Jakarta, October 23, 2024	PT Bank Tabungan Negara (Persero) Tbk
Internalization of BTN Giro Products	Jakarta, November 19, 2024	PT Bank Tabungan Negara (Persero) Tbk
Internalization of Sahabat Transformasi Episode 4	Jakarta, 06 Desember 2024	PT Bank Tabungan Negara (Persero) Tbk
Internalisasi Good Corporate Governance	Jakarta, 13 Desember 2024	PT Bank Tabungan Negara (Persero) Tbk
Internalisasi Sistem Manajemen Kepatuhan BTN ISO 37301:2021	Jakarta, 13 Desember 2024	PT Bank Tabungan Negara (Persero) Tbk
Internalisasi Produk Kring BTN	Jakarta, 24 Desember 2024	PT Bank Tabungan Negara (Persero) Tbk

Implementation of Corporate Secretary Duties in 2024

Throughout 2023, the Corporate Secretary has carried out the following duties and responsibilities:

1. Presentation of Capital Market Developments to the Board of Directors and Board of Commissioners, including the dissemination of information on the latest regulations and provisions in the capital market that the Company must comply with. Several new regulations that have been socialized and internalized within the Company's internal regulations by the Corporate Secretary include:
   a. Financial Services Authority Regulation No. 2 of 2024, dated March 6, 2024, concerning the Implementation of Sharia Governance for Sharia Commercial Banks and Sharia Business Units.
   b. Financial Services Authority Regulation No. 30 of 2024, dated December 19, 2024, concerning Financial Conglomerates and Parent Companies of Financial Conglomerates.
   c. Financial Services Authority Regulation No. 45 of 2024, dated December 27, 2024, concerning the Development and Strengthening of Issuers and Public Companies.
2. Communication program to the capital market community together with Investor Relations. The method used is as follows:
   a. Direct, through the General Meeting of Shareholders and Public Expose.
   b. Indirect, through Annual Reports, Publication of Financial Reports, and Press Releases.
   c. Information Disclosure to, among others, shareholders, relevant regulators, and/or the public.
3. Fulfillment of Information disclosure obligations as regulated, among others, in:
   a. OJK Regulation no. 8/ POJK.04/2015 dated 25 June 2015 concerning Issuer or Public Company Websites,
   b. OJK Regulation no. 31/ POJK.04/2015 dated 22 December 2015 concerning Disclosure of Material Information or Facts by Issuers or Public Companies,
   c. Decree of the Board of Directors of the Indonesian Stock Exchange No. Kep-00066/BEI/09-2022 Concerning Amendments to Regulation Number I-E Concerning the Obligation to Submit Information.

   Throughout 2024, the Corporate Secretary has submitted 14 (fourteen) disclosure reports to the Financial Services Authority (OJK) and the Stock Exchange. All reports were submitted within the required timeframe, which is no later than the second working day after a decision is made or the occurrence of material information or facts that may affect the company's securities value or investors' investment decisions. In addition to these disclosure reports, the Corporate Secretary also coordinates the submission of explanations in response to any inquiries or requests from the Stock Exchange regarding news related to the Company In accordance with Stock Exchange Regulation No. I-E, a Listed Company is required to provide a written response to inquiries from the Stock Exchange no later than 1 (one) trading day after receiving a request for explanation, whether delivered by fax or other means of communication. Throughout 2024, the Company has received 4 (four) requests for explanations from the Stock Exchange and the Financial Services Authority (OJK). .
4. Increased Access to Information to the Public
   The Company always makes it easy for stakeholders and/ or the public (public) to access information and communicate with stakeholders using a one door policy which is assisted in coordination by the Corporate Secretary. The Company also improves the quality of information delivery to the public by providing Public Information Disclosure services on the Company's website, in order to fulfill the following provisions:
   a. Law of the Republic of Indonesia no. 14 of 2008 dated 30 April 2008 concerning Openness of Public Information.
   b. Republic of Indonesia Government Regulation no. 61 of 2010 dated 23 August 2010 concerning Implementation of Law no. 14 of 2008 concerning Openness of Public Information.
   c. Information Commission Regulation no. 1 of 2010 dated 7 June 2010 concerning Public Information Service Standards.

   Apart from publications via the Company's website, the public can also access information about the Company through mass media, as well as social media consisting of Facebook, Twitter, YouTube and Instagram which are managed jointly with the Marketing Communication Division.
5. Media Relations and Information Access
   The Corporate Secretary consistently strives to maintain good relationships with mass media, including electronic media (TV, radio), print media (newspapers, magazines), and online media. Throughout 2024, the Corporate Secretary has issued press releases and photo news that hold news value for the Company, covering business performance developments, Corporate Social and Environmental Responsibility (TJSL), and operational updates. A total of approximately 195 (one hundred ninety-five) news reports were published, consisting of 107 (one hundred seven) press releases and 88 (eighty-eight) photo news reports. .
6. Organizing General Meeting of Shareholders (GMS) The Corporate Secretary coordinates the organization of the Company's General Meeting of Shareholders (GMS) by referring to OJK Regulation No. 15/ POJK.04/2020 dated 20 April 2020 concerning

Plans and Implementation of the General Meeting of Shareholders of Public Companies. In 2024, the Company held one General Meeting of Shareholders (GMS), specifically the Annual GMS on March 6, 2024. All GMS procedures were carried out in accordance with the above-mentioned Financial Services Authority Regulation (POJK) and the Company's Articles of Association, including notifications, announcements, invitations, as well as the submission of minutes and meeting reports..

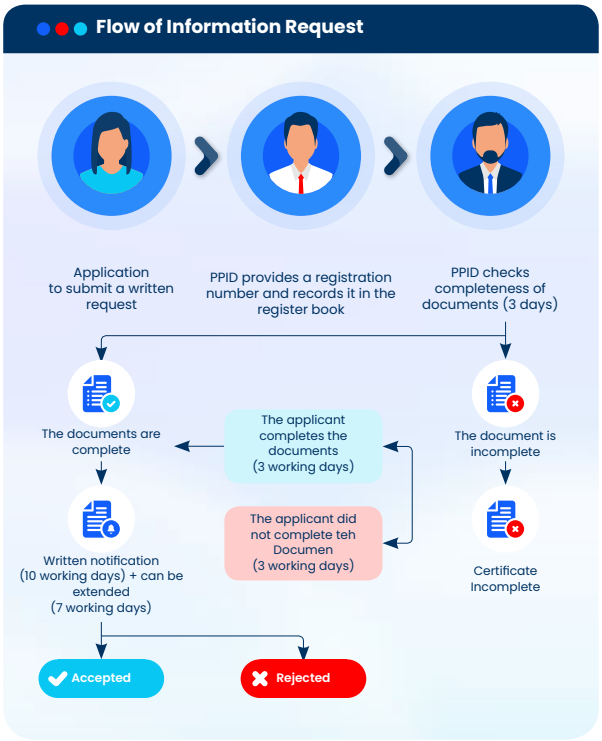
7. Organizing and Documenting Directors' Meetings and Directors' Meetings with the Board of Commissioners, including;
   a. Receive proposed agendas and materials that will be decided at Board of Directors Meetings and Board of Directors Meetings with the Board of Commissioners from other Divisions/Desk/work units.
   b. Ensure that the delivery of materials, quorum and decision making at Board of Directors Meetings and Board of Directors Meetings with the Board of Commissioners run in accordance with applicable regulations.
   c. Prepare minutes signed by the Directors who attend the Directors' Meeting and the Directors' Meeting with the Board of Commissioners initiated by the Directors.
   d. Administering minutes of Directors' Meetings. Convey the decisions of the Board of Directors Meeting and the Board of Directors Meeting with the Board of Commissioners to the relevant Division/Desk/work unit for immediate follow-up.

   Throughout 2024, the Corporate Secretary has coordinated the organization of 205 (two hundred five) Board of Directors meetings, 8 (eight) Board of Commissioners meetings inviting the Board of Directors, and 6 (six) Board of Directors meetings inviting the Board of Commissioners.
8. An orientation program was conducted for the newly appointed Board of Directors and Board of Commissioners members, namely Mr. Muhammad Iqbal, Mr. Bambang Widjanarko, and Mrs. Adi Sulistyowati.

IMPLEMENTATION OF THE DUTIES OF THE CORPORATE SECRETARY AS INFORMATION AND DOCUMENTATION MANAGEMENT OFFICER (PPID)

Standard Operating Procedure for Public Information Disclosure (SOP KIP)

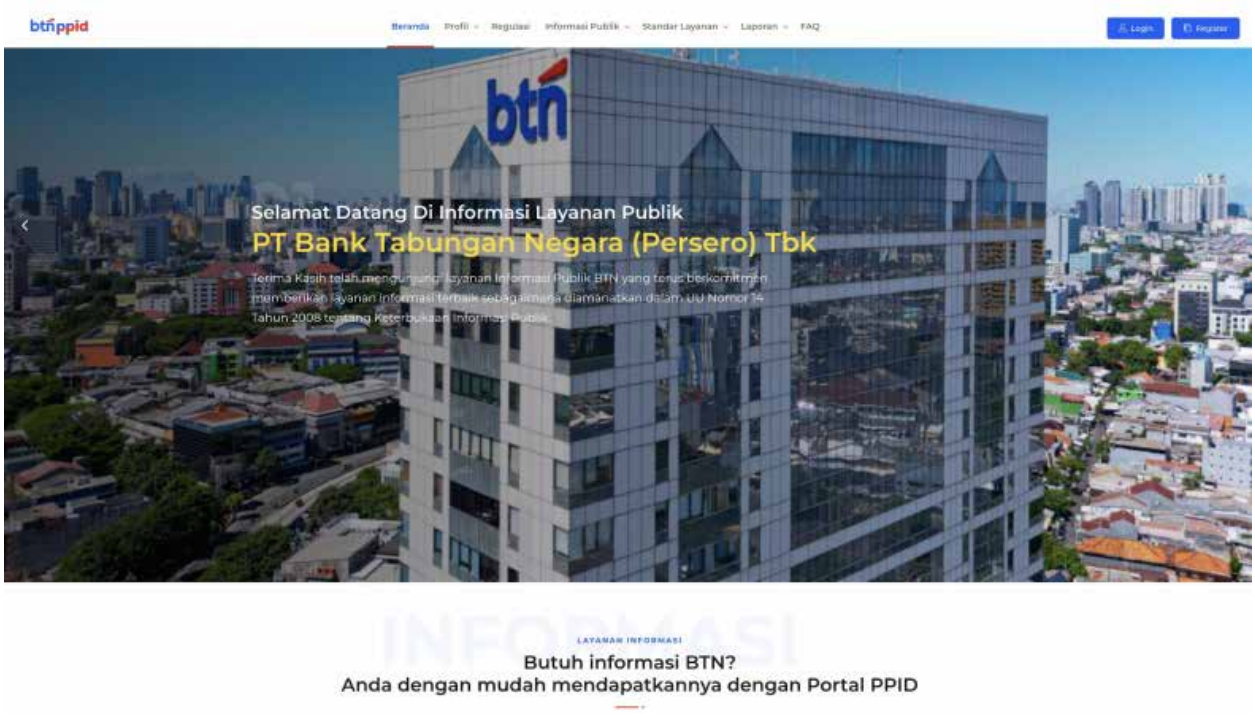
BTN's Standard Operating Procedure for Public Information Disclosure (SOP KIP) is comprehensively compiled in the Technical Instructions of PT Bank Tabungan Negara (Persero) Tbk Number PT.9-AD.1 concerning Submission of Information to the Public.





Management System of Public Information Administration

Implementing Public Information services that include the process of storing, documenting, providing, and servicing the Company's Public Information is the scope of responsibility of the BTN PPID. The close support of technology for the management of Public Information administration is reflected in the form of administrative processes ranging from registration, information requests, written notifications, filing objections to management reports that have been digitally integrated through the BTN PPID Portal. The BTN PPID Portal can be accessed and navigated by the Public easily and free of charge.



Facilities and Infrastructure

Public Information Service Room is prepared for the public who come directly to the office (face-to-face) in order to obtain Public Information at BTN offices throughout Indonesia. The Company provides supporting service facilities such as service desks, waiting rooms, digital information boards, and services for people with disabilities such as wheelchair ramps. The public will be served by Public Information Service Officers at Branch Offices and PPID Officers at the Head Office. Especially for people with disabilities, they will also be assisted in accessing the BTN PPID Portal through the facilities provided. In addition, the BTN PPID Portal is equipped with sound, color settings, letters, and others. Through official social media such as Instagram, X, Youtube, Facebook, TikTok, and so on. The Company presents the latest Public Information that is easily accessible to the public.

Accessibility

Requests for information by the public can be submitted through open access for the public provided by the Company.

1. The public can come directly to the Public Information Service Room, BTN Tower 2, 30th Floor, Jalan H.R. Rasuna Said Number 1, South Jakarta, or to the nearest Branch Office in the area where the information is being used.
2. Information can also be requested by letter sent to the PPID Head Office and/or the nearest Branch Office.
3. If it is requested via e-mail, it can be sent to csd@btn.co.id.
4. For those who find it easier to communicate by telephone, they can contact the PPID Head Office at 021-6336789 Ext. 2003.
5. Information request can also be sent via the Whatsapp application to 0877-7150-0286.
6. Other information channels that are currently very easy to access are also monitored for follow-up, namely the BTN PPID Portal https://ppid.btn.co.id. and/or via the BTN PPID android application which can be downloaded via the smartphone of the information user.

Human Resources

In accordance with the organizational structure of PPID BTN, human resources (HR) at the Head Office and Branch Offices of the Company throughout Indonesia have been mapped well, who are also organic employees of the Company. In this regard, the HR of PPID BTN Head Office consists of 3 (three) BTN employees with a public relations background, while the HR of PPID BTN Branch Office consists of a minimum of 3 (three) BTN employees who are Heads of Branch Offices and Customer Service of the Company. To support the implementation of the responsibilities and duties of each unit, PPID HR receives online learning, socialization, and internalization of Public Information Disclosure organized by PPID Head Office..

BTN PPID Portal and BTN PPID Mobile Apps

As the mission of BTN PPID is to provide Public Information and services through digital innovation, the Company is continuously improving the function of the BTN PPID Portal. In 2024, the BTN PPID Mobile Apps were launched which make it easier for the Public to access Public Information related to the Company. In addition, the BTN PPID Portal has been integrated with the corporate Website so that the Public can visit and navigate all needs through one digital channel.

Budget

The Company provides a number of budgets to support Public Information service activities. In 2024, a budget of IDR468,000,000 (Four hundred and sixty eight million rupiah) was provided, which was used to support Public Information Service Room facilities, Public Information Disclosure meeting/socialization activities, making communication materials such as Public Information service videos, and supporting activities held together with the Information Commission of the Republic of Indonesia to increase public awareness of Public Information Disclosure and its implementation in the Company.

Recapitulation of Public Information Services 2024

There were 22 (twenty-two) requests for Public Information to the Company that have been fully summarized, both those requested online (BTN PPID Portal, BTN PPID Mobile Apps, and e-mail) and offline (letters and coming directly to the office).

Applicant	Amount	Time of Providing Information	Information			Reason for Rejection
			Rejected	Partially Given	Partially Given	
Individual	20	10	4	12	4	Incomplete Application Data
Legal Entity	1	10	1	-	-	Documents are incomplete
Group of People	1	10	1	-	-	Documents are incomplete

In 2024, there were several requests for information that were provided partly because the information requested was information that was not directly controlled by the PPID, such as related to banking services and required confirmation of the applicant's personal data to access the information in question. Therefore, we directed most of these Individual applicants to access the Company's banking service channels.

The average service time required to fulfill the Public Information request is 10 days. After the recapitulation, it can be concluded that all applicants submitted Public Information Requests through the BTN PPID Portal. Furthermore, there were no submissions or resolutions of Public Information disputes during 2024

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Obstacles in the Implementation of Public Information Services

There were several obstacles in the implementation of Public Information Services during 2024. These obstacles arose from both Internal and External parties of the Company. Along with the current development of Public Information Disclosure, the obstacles that occured also involved the convenience of applicants in obtaining public information face-to-face at the Branch Office. Applicants who came directly to the Branch Office met with the Public Information Service Officer in the Customer Service work area, but not all of the Company's Branch Offices have a layout with a digital banking hall format so that there is no similarity in comfort for applicants who come directly to the office. Then, from the external side, there were still some information applicants who made requests for information that the

Company conveyed either directly face-to-face or via social media and other electronics such as the BTN PPID Portal and the BTN PPID mobile application. However, this is the obligation of the service officer to continue to provide information so that the applicant can be well-literate.

Recommendations and Follow-up Plans for Public Information Services

From the implementation of Public Information services in 2024, the Company has several recommendations and follow-up plans that can improve and support the performance of public information services in 2025, including:

1. The Company strives to improve the facilities and infrastructure of Public Information services, especially for people with disabilities. This optimal effort is needed to provide an equal service experience in all Branch Offices, namely by providing a comfortable Public Information Service space that is integrated with digital services.
2. Continuously carry out the development and improvement of the functions of the BTN PPID Portal and the BTN PPID mobile application as well as socialization to the public regarding the Company's digital information services.
3. Prioritize socialization and/or training related to Public Information Disclosure to Public Information Service officers at Branch Offices throughout Indonesia.
4. Actively participate in various activities that have elements of Public Information Disclosure, both those organized by the Company and other authorized institutions.
5. Respond quickly to updating internal regulations to comply with regulatory provisions on Public Information Disclosure which aims to provide the best Public Information services for the Indonesian people.

The Function of the Internal Audit Division

The internal audit functions as a strategic business partner for the management in optimizing the implementation of the Company's Good Corporate Governance, risk management, and providing assurance and recommendation independently and objectively on the Company's internal control. The internal audit function is carried out by the Internal Audit Division (IAD) through an evaluation process based on the objective risk-based audits and consulting services, especially those concerning the improvement and refinement of risk management, control, and governance processes. This function is carried out through proactive, enthusiastic, and dynamic approach by conducting effective communications, and focusing on business and stakeholder's orientation, understanding the root of the problem about areas with high-risk, emphasizing findings on quality, and recommending practical and workable solutions.

The Position of the Internal Audit Function in the Organizational Structure

The position of the Internal Audit Division (IAD) as the executor of the internal audit function is under the supervision of the President Director as stipulated in Technical Instruction No.PT.3-A.6 dated September 14, 2023 as last amended on September 2, 2024 concerning the Organizational Structure of the Head Office, Regional Offices, and Branch Offices. In addition, the position of the internal audit function is also explained in the Internal Audit Charter which is regulated in Special Policy No.KK.7-A dated 27 April 2023 as last amended on 31 October 2023, in Chapter II Structure and Position of the IAD, namely:

1. Point 1 states that the Internal Audit Division (IAD) is an Internal Audit Work Unit (SKAI) in the Bank organization whose position is directly under the President Director.
2. Point 2 states that the IAD as referred to in point 1 is led by a Division Head who is directly responsible to the Main Director.
3. Point 3 states that the Head of IAD as referred to in point 2 is appointed and dismissed by the President Director after obtaining approval from the Board of Commissioners by considering the recommendations of the Audit Committee and reporting to the Financial Services Authority.

The Parties Entitled to Appoint and Terminate the Head of Internal Audit Vision

Parties involved in the process of appointing or dismissing the Head of the Internal Audit Division are the President Director, the Board of Commissioners, and the Financial Services Authority as regulators. The process of appointing or dismissing which describes the involvement of the several parties referred to is as follows:

1. The Director conducts a fit and proper test on candidates for the Head of the Internal Audit Division.
2. The President Director submits a request for approval for the appointment/dismissal of the Head of the Internal Audit Division to the Board of Commissioners.
3. The Board of Commissioners approves or disapproves of the appointment/dismissal of the Head of the Internal Audit Division.
4. The Board of Commissioners and the Board of Directors submit reports on the appointment/dismissal of the head of the Internal Audit Division to the Financial Services Authority as the regulator

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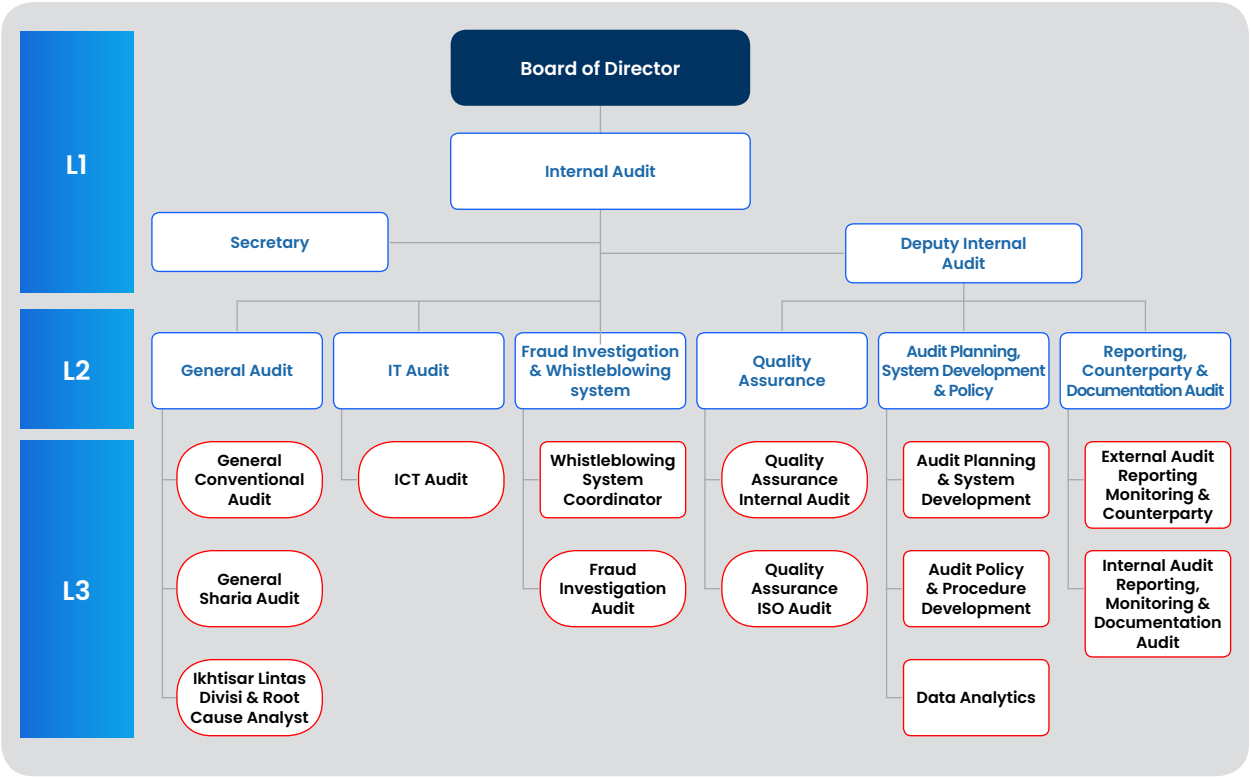
Internal Audit Division Organizational Structure



The Profile of The Head of Internal Audit



Hendratno Tri Wibowo
Internal Audit Division Head

Indonesia citizen,
Surakarta, May 24, 1974
50 years old as of December 2024,
domiciled South Tangerang.

Educational Background
- Diploma (D3) of Accounting from State College of Accountancy (1995)
- Bachelor degree (S1) of Accounting from Indonesia University (1998)
- Master (S2) of Accounting from The University of Queensland, Australia (2003)

Certification
- Certified Internal Audit Executive (CIAE)
- Qualified Internal Auditor (QIA)
- Risk Management Competency Level 4 (Stage 6) – Banking Professional Certification Institute

Work Experience
- Auditor/Investigator, Indonesian Audit Board (1995-2010)
- Fraud Risk Management Division Head, Bank Permata Tbk (2011-2020)
- Post Mortem & Forensic Audit (Special Audit) Division Head, Bank Exim Indonesia (2020-2021)
- Internal Audit Division Head, BTN (2021- present)

Legal Basis for Appointment
- Board of Directors Decree No. 642/DIR/2021 July 26, 2021 concerning the Head of the Internal Audit Work Unit of PT Bank Tabungan Negara (Persero) Tbk.
- Letter of the Board of Commissioners of PT Bank Tabungan Negara No.60/KOM/BTN/V/2021 dated May 05, 2021 regarding Approval of the Proposed Appointment of the Head of the Internal Audit Division/Head of the Internal Audit Work Unit (IAWU).

Internal Audit Charter

The Internal Audit Division has been equipped with a Work Guide called the Internal Audit Charter which has been prepared since 2002 and then updated and finalized based on Special Policy No.KK.7-A dated 27 April 2023 as last amended on 31 October 2023 regarding the Internal Audit Charter. The Internal Audit Charter is also the basis for the existence and the implementation of supervisory duties and responsibilities for IAD. Therefore, the Internal Audit Charter is disseminated to all employees and other related parties to encourage the effectiveness of the implementation of the internal audit function. The contents of the Internal Audit Charter are as follows:

1. Internal Audit Division Mission;
2. Structure and Position of the Internal Audit Division
3. Scope;
4. Duties, Responsibilities, and Authorities;
5. Independence, Objectivity and Prohibition of Duplication of Duties and Positions of Internal Auditors;
6. Code of Ethics and Requirements for Internal Auditors
7. Use of External Party Services in Carrying Out Internal Audits;
8. Relationship between the Internal Audit Division and External Auditors or Legal Experts;
9. Others.

Duties and Responsibilities of the Internal Audit Division

IntThe Internal Audit Division assists the duties of the President Director and the Board of Commissioners as well as all levels of management in ensuring the adequacy of the Company's internal control system and providing strategic and constructive suggestions for the management of the Company within the framework of implementing good and healthy corporate governance with the following tasks:

1. To assist the duties of the President Director and the Board of Commissioners in carrying out supervision by elaborating operationally in planning, implementing, and monitoring audit results.
2. To make analysis and assessments in the terms of finance, accounting, operations, and other activities through onsite audits and off-site monitoring, including conducting management audits of all the Company's work units;
3. To identify all possibilities to improve and increase the efficiency of the use of resources and funds.
4. Provide suggestions for improvement and objective information about the activities examined at all levels of management.
5. Prepare and implement the Annual Internal Audit plan and budget allocation for implementing the internal audit function
6. Test and evaluate the effectiveness of the implementation of the internal control system, risk management and corporate governance processes in accordance with statutory regulations and the Company policies.
7. To carry out inspections and assessments on the efficiency and effectiveness in the fields of finance, accounting, operations, human resources, marketing, information technology, and other activities;
8. To compile an audit report and submit the report to the President Director and the Board of Commissioners;
9. To control, analyze, and report the implementation of followup improvements that have been suggested;
10. To cooperate with the Audit Committee;
11. To develop a program to evaluate the quality of the internal audit activities;
12. To carry out special inspections (audits) if necessary.

The Authorities of the Internal Audit Division

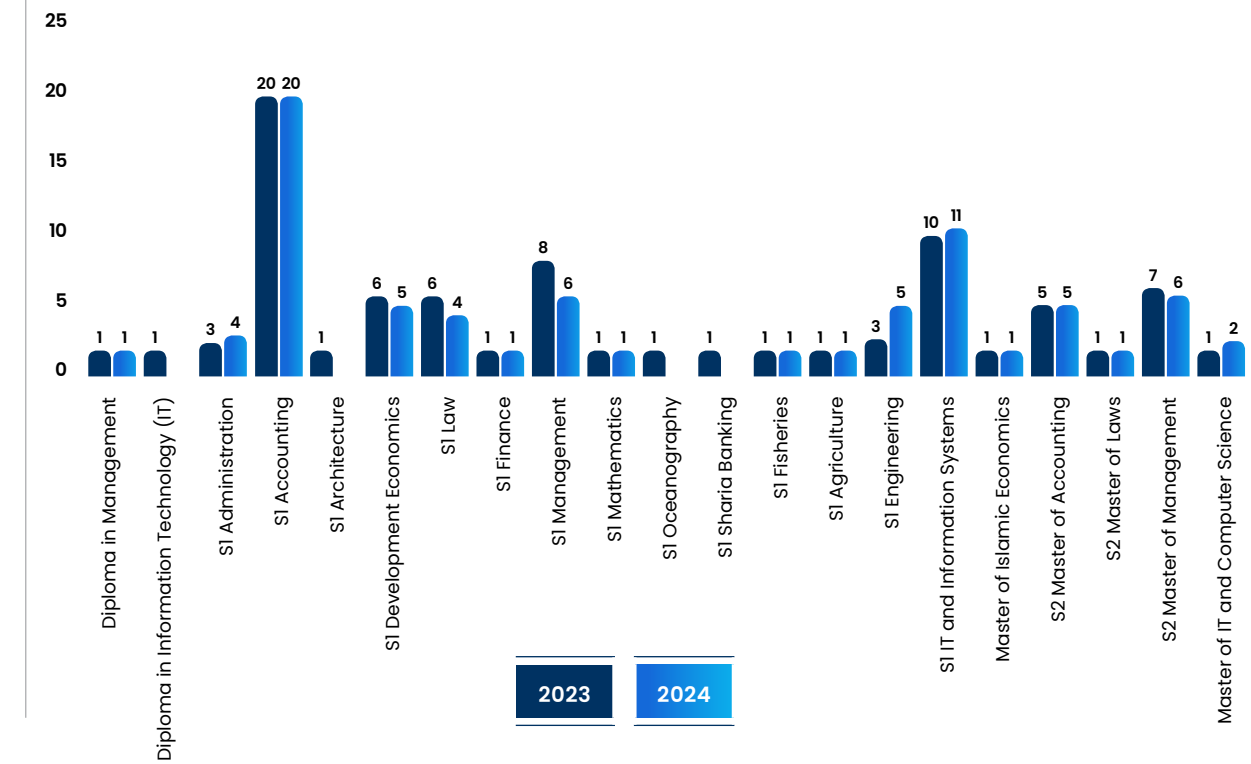
To be able to carry out audit missions, functions and tasks, the IAD has at least the following authorities:

1. Access all information, data including but not limited to employee data and resources as well as other matters deemed necessary related to their duties and functions.
2. Communicate directly with the Board of Directors, Board of Commissioners, Audit Committee and/or Sharia Supervisory Board as well as members of the Board of Directors, Board of Commissioners, Audit Committee and/or Sharia Supervisory Board.
3. Hold regular and incidental meetings with the Board of Directors, Board of Commissioners, Audit Committee and/or Sharia Supervisory Board in connection with the implementation of their duties and functions.
4. Coordinate its activities with the activities of the external auditors.
5. Participate in strategic meetings.

Personnel Composition of the Internal Audit Division

The Company is very concerned about the adequacy of the Internal Audit Division personnel composition in supporting the implementation of its duties, both in terms of the number of job qualifications and competencies. The Internal Audit Division personnel as of December 2024 are 74 (seventy-four) people led by 1 (one) Division Head and assisted by 1 (one) Secretary, 1 (one) Deputy Division Head, 36 (thirty-six) people in the General Audit Department, 9 (nine) people in the IT Audit Department, 6 (six) people in the Fraud Investigation & Whistleblowing System Department, 7 (seven) people in the Quality Assurance Department, 6 (six) people in the Audit Planning, System Development & Policy Department, and 7 (seven) people in the Reporting, Counterparty & Documentation Audit Department.

The following is the composition of the Internal Audit Division personnel based on education:



Internal Audit Division Competency Improvement Program

Each IAD member is facilitated and encouraged to develop their competence in supporting the implementation of the internal audit function. Competency development is carried out by means of knowledge sharing between the Head of IAD, Directors, and auditors on Internal Policies and Procedures, certification programs, education and training, workshops and seminars. Until December 2024, competency development that has been carried out in the form of internal and external training includes the following:

Internal Audit Division Personnel Competency Development Table

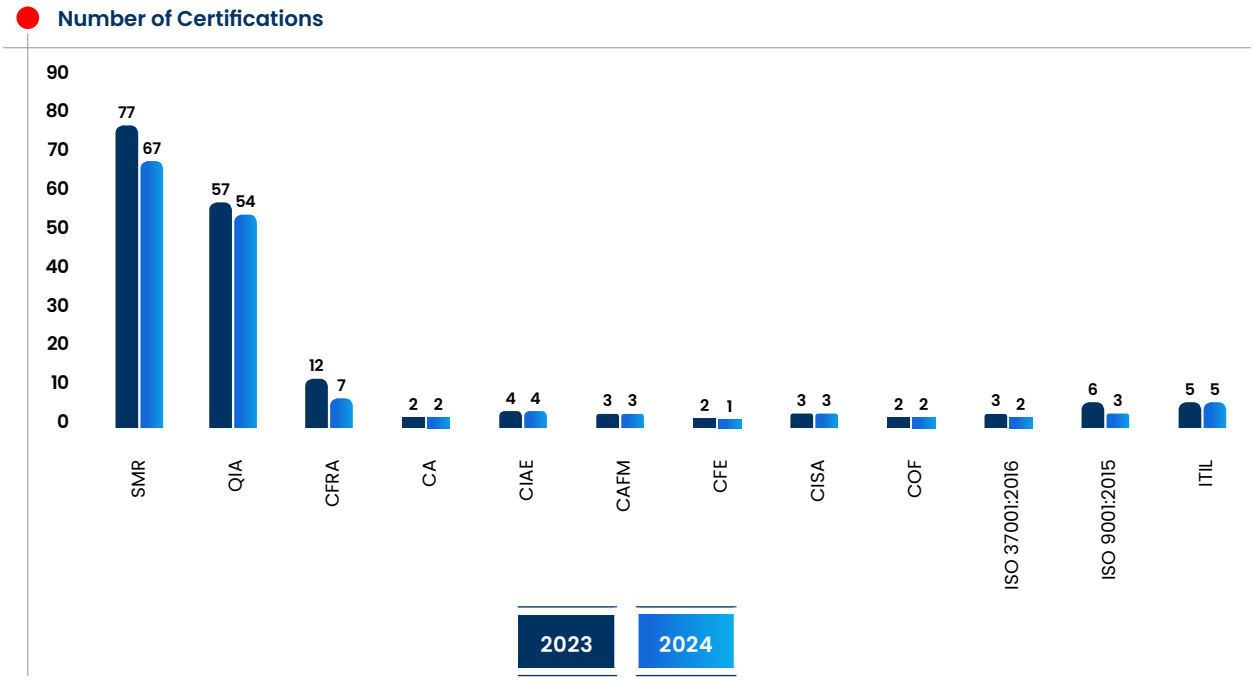
No.	Name of Training/ Education	Facilitator	Implementation	Total Participant
Certification				
1.	Training on Certified Documentary Credit Specialist (CDCS) Certification	Bank BTN	January 09-13, 2024 (Provision)	2
			January 20 – May 4 2024 (Tutorial)	1
2.	Training on Qualified Internal Auditor (QIA) Certification – Basic	Internal Audit Education Foundation (YPIA)	January 22 - February 03, 2024 (Batch 1)	4
			September 02 - September 14, 2024 (Batch 2)	3
			October 14 - October 26, 2024 (Batch 3)	3
3.	Training on Qualified Internal Auditor (QIA) Certification – Advanced	Internal Audit Education Foundation (YPIA)	January 22 - February 03, 2024 (Batch 1)	1
			February 19 - March 02, 2024 (Batch 2)	5
4.	Training on Qualified Internal Auditor (QIA) Certification – Managerial	Internal Audit Education Foundation (YPIA)	February 05 - February 16, 2024	14
5.	Training on Banking Risk Management Certification KKNI Level 4	BTN & LSP LSPP	August 01 - August 02, 2024, August 20, 2024 (Batch 10)	5
			August 22 - August 23, 2024, September 02, 2024 (Batch 11)	1
			September 02 - September 03, 2024, September 13, 2024 (Batch 12)	1
6.	Training on Certified Forensic Auditor (CFrA) Certification	Fraud Auditing Development Institute (LPFA)	October 16 – October 18, 2024	2
Training and Workshops				
1.	Training on BTN Business Process Refreshment	Bank BTN	January 08 - Januari 19, 2024	78
2.	Training on Cloud Computing	PT Cynnex Integrasi Solusi	January 22 - February 03, 2024 (Batch 1)	7
3.	Coaching & Strategic Business Leaders Training	Bank BTN	January 13, 2024	1
4.	Training on SDLC Through DevSecOps	PT Cynnex Integrasi Solusi	January 15 - 18, 2024	7
5.	Training on Data & Information Security Management	PT Cynnex Integrasi Solusi	January 29 - 31, 2024	6
6.	Training on Design Thinking T	Corporate Innovation Asia (CIAS)	January 22, 2024	70
7.	Training on Effective Audit Report Preparation	Narabahasa (PT Wahana Mega Cita)	January 23, 2024 (Batch 1)	35
			January 24, 2024 (Batch 2)	35
8.	Internal Control Over Financial Reporting (ICOFR) Training	Indonesian Institute of Accountants (IAI)	January 25, 2024	70

No.	Name of Training/ Education	Facilitator	Implementation	Total Participant
9.	Competency Enhancement Program for BOD-1	Bank BTN	January 27, 2024	1
10.	Training on the Procurement of Goods and Services Audit	Financial and Development Supervisory Agency (BPKP)	January 29, 2024	15
11.	Training on Trade Finance Audit	Alta Perfecto Training & Consulting	January 30 – 31, 2024	12
12.	Training on Character Building	KH Ridwan Muhammad Yusuf	February 01, 2024	1
13.	Training on ESG Audit	Financial and Development Supervisory Agency (BPKP)	February 02, 2024	65
14.	Workshop on Internal Audit Professional Standards and Code of Ethics	Internal Audit Education Foundation (YPIA)	February 05 – 06, 2024	24
15.	Training on Audit and Sampling Technique	KPMG	February 13, 2024	50
16.	Expert Talk Session "Crafting Executive Savvy in Global Business Mindset"	Bank BTN Source person: Deputy Minister of Foreign Affairs of the Republic of Indonesia	February 21, 2024	1
17.	Training on Digital Bank Maturity Level Assessment	Intellectual Business Community	February 22, 2024	2
18.	Training on Treasury Audit	Bank Internal Audit Association (IAIB)	February 24, 2024	15
19.	FKDKP Webinar "Handling of Banking Crimes with the Enactment of the P2SK Law and OJK regulation No. 16 of 2023"	Forum Komunikasi Direktur Kepatuhan Perbankan (FKDKP)	February 29, 2024	2
20.	Coaching & Strategic Business Leaders Training	BTN	March 09, 2024	1
21.	Training on Risk Maturity Index (RMI) Assessor	PT Pendidikan Maritim dan Logistik Indonesia	March 08, 2024	3
22.	OJK Webinar "Idea Talks Volume 4: SJK Development Strategy Through Strengthening Islamic Banking and Market Conduct"	The Financial Service Authority (OJK)	March 13, 2024	1
23.	OJK Webinar "Opportunities and Challenges of Digital Assets in Indonesia"	The Financial Service Authority (OJK)	March 14, 2024	1
24.	Performing an Effective Quality Assessment	The Institute of Internal Auditors (IIA)	March 20 – 21, 2024	2
25.	Training on Merger Preparation, Acquisition, and Integration: Journey Towards a Seamless Transition	PT RSM Indonesia	March 27 – 28, 2024	2
26.	Classical Training 1 of BTN Talent Development Program	BTN	April 19 – 24, 2024 (Batch 1)	1
			May 02 – 07, 2024 (Batch 2)	1
27.	Workshop on BTN Leadership "Leading Transformation from Strategy to Organizational Success" BTN Leadership Workshop "Leading Transformation from Strategy to Organizational Success"	BTN	May 03, 2024	1

No.	Name of Training/ Education	Facilitator	Implementation	Total Participant
28.	Training of ISO 37001:2016 SMAP	Robere & Associates	May 06, 2024	3
29.	Training of ISO 9001 Requirements and Implementation	BSI Training Academy	May 06 – 08, 2024	2
30.	Training on the Implementation of Use of Domestic Products (P3DN) in the Procurement Process of Goods and/or Services	PT Surveyor Indonesia	May 14 – 15, 2024	1
31.	OJK Webinar "Credit Growth Opportunities After the End of Credit Restructuring Policy"	The Financial Service Authority (OJK)	May 22, 2024	2
32.	OJK Webinar "Opportunities and Challenges of Personal Data Protection in Transactions in the Digital Era"	The Financial Service Authority (OJK)	May 30, 2024	2
33.	OJK Webinar "Strengthening GRC Function: Dissemination of Latest Internal Audit Standards"	The Financial Service Authority (OJK)	June 07, 2024	2
34.	Coaching & Strategic Business Leaders Training for Department Heads	BTN	June 08, 2024	1
35.	Workshop on Strategy for Facing BPK Audits to Achieve/ Maintain WTP Opinion on BUMN/ BUMD Financial Reports in an Effort to Prevent Corruption	Lembaga Kajian Keuangan Nasional (LKKN)	June 27 - 28, 2024	1
36.	Training on Fraud Auditing 1	Fraud Auditing Development Institute (LPFA)	July 02 – 05, 2024	2
37.	Internal Audit Conference (KAI)	Internal Audit Education Foundation (YPIA)	July 10 – 11, 2024	5
38.	OJK Webinar "Improving Company Performance through Artificial Intelligence"	OJK Institute	July 25, 2024	2
39.	Training on Fraud Auditing 1	Fraud Auditing Development Institute (LPFA)	August 06 – 09, 2024	1
40.	Training on Fraud Auditing 2	Fraud Auditing Development Institute (LPFA)	August 13 – 16, 2024	2
41.	OJK Webinar "Building Spiritual-Based Leadership: A Holistic Approach to Business Growth and Sustainability"	OJK Institute	August 22, 2024	2
42.	Training on Business Performance Through Effective Coaching for Leaders	BTN	August 24, 2024	1
43.	National Anti Fraud Conference (NAFC)	Fraud Auditing Development Institute (LPFA)	September 05 – 06, 2024	1
44.	Training on Leadership Development "Performance Management Strategies"	Fraud Auditing Development Institute (LPFA)	September 19 – 21, 2024	1
45.	Training on Young Leaders Talks "Leading with Impact, Crafting Your Success Story"	BTN	September 26, 2024	5
46.	BOD Talks & Expert Session	BTN	October 03, 2024	5
47.	OJK Webinar "Bank Cyber Security Book Review"	OJK Institute	November 07, 2024	2

Professional Certification of the Internal Audit Division

The number of Internal Audit Division personnel's certification for the position of December 2024 is as follows:



Description:
SMR (Risk Management Certification), QIA (Qualified Internal Auditor), CFrA (Certified Forensic Auditor), CA (Chartered Accountant), CIAE (Certified Internal Audit Executive), CAFM (Certified Anti Fraud Manager), CFE (Certified Fraud Examiner), CISA (Certified Information System Auditor), COF (Certified Oxygen Forensic), ISO 37001:2016 (Anti-Bribery Management System), ISO 9001:2015 (Quality Management System), ITIL Foundation Certificate in IT Service Management.

Participation in the Association of Internal Audit Professions

In order to broaden the insights and professional development of Internal Auditors, the Internal Audit Company Organization has participated by involving its auditors in various internal audit professional organizations, including as administrators, members, and participation in the activities of internal audit professional associations as follows:

1. **Organization of the Association of Bank Indonesia Internal Auditors (IAIB**
   In the context of developing and increasing insight, IAD Leaders and Auditors always participate in benchmarking discussion forums and best practice development workshops organized by the IAIB forum. The workshop and benchmarking materials in this IAIB forum include managerial level material on the management of the Internal Audit function for Chief Auditor Executive (CAE) leaders as well as for the Auditor level in the form of audit techniques, audit methodology and ICT audits which are held through discussion forums and workshops with Auditors of other banks who are members of the IAIB.
2. **The Institute of Internal Auditor (IIA) dan Association Certified Fraud Examiner (ACFE) – Indonesia Chapter**
   Furthermore, internal audit members are also encouraged to become members of The Institute of Internal Auditors (IIA) and the Association Certified Fraud Examiner (ACFE)- Indonesia Chapter.

Code of Conduct of the Auditors

The Internal Audit Code of Conduct is the norms and principles regarding decency and appropriateness that must be complied with and implemented by internal auditors, which at least includes the internal audit code of conduct as stipulated by the internal audit professional association, as follows:

1. Integrity
   a. To perform their duties honestly, carefully, responsibly, and thoroughly.
   b. To comply with the law and make disclosures in accordance with statutory regulations and the profession.
   c. To not intentionally/knowingly engage in prohibited/ illegal activities, do not take actions that could undermine the credibility of the Internal Audit and the internal audit profession.
   d. To respect and support the organization's legitimate and ethical goals.

2. Objectivity
   a. Not involved in activities or have a relationship that will reasonably be expected to hinder the Internal Auditor's fair assessment. This includes any activities or relationships that result in a conflict of interest.
   b. To not accept anything that has an impact or is suspected to have an impact on professional judgment.
   c. Must disclose all material facts known to him, which if not disclosed could distort the report on the activities being reviewed.
3. Confidentiality
   a. To be careful in using and maintaining the information obtained in the performance of duties.
   b. To not use information for the benefit of anyone and/or in any way that would be against the laws and/or the Company's regulations.
4. Competency
   a. To carry out tasks in accordance with the knowledge, skills, and experience only.
   b. To carry out audits in accordance with Internal Audit Professional Standards.
   c. To improve expertise, effectiveness, and quality continuously.

Brief Report on the Implementation of Internal Audit Activities In 2024

In 2024, the Internal Audit Division (IAD) has prepared an audit work plan or program and carried out audit activities in accordance with the plans that have been prepared. The work program plan includes the nature and scope of the audit, risk assessment, composition and number of the audit team personnel, standard effective of audit work days, length of standard audit days, required number of personnel and qualifications for IAD members, and IAD personnel development.

INTERNAL AUDIT WORK PLAN

The Internal Audit Division Work Plan is outlined in the Annual Audit Plan book with a work period of 1 year. The Annual Audit Work Plan for the Internal Audit Division (IAD) for 2024 has been submitted to the President Director based on IAD memo No.04/M/IAD/APSP/I/2024 dated January 16, 2024 concerning the Proposal for the Annual Audit Plan for 2024 and has been approved and signed by the President Director. In addition, in accordance with POJK regulation Number 1/POJK.03/2019 concerning the Implementation of Internal Audit Functions in Commercial Banks, the Annual Audit Work Plan has also obtained approval from the Board of Commissioners based on the Board of Commissioners' letter No. 36/KOM/BTN/II/2024 dated February 28, 2024. The 2024 audit work plan in general is as follows:

Table of the Internal Audit's Work Plan

Audit Object		Amount		Change		Information
		2024	2023	+/-	%	
A.	General Audit	72	69	3	4.35	
B.	Audit ICT	18	18	0	0.00	
C.	Special Audit	0	0	0	0.00	There is no scheduled planning for the implementation of special audits/investigations in 2024, will follow assignments from stakeholders and the whistleblowing system.
D.	ISO Standard Audit	31	27	4	14.81	
Number of Audit Objects		121	114			

IMPLEMENTATION OF THE INTERNAL AUDIT DIVISION WORK PROGRAM

During the period January to December 2024, the Internal Audit Division carried out audit activities with audit objects which include:

A. General audit which includes:
   1. Operational audit of office networks (KC, Sharia KC and Regional Office).
   2. Thematic audits carried out based on certain themes include Credit Management, Collection of Third-Party Funds, Human Capital, Procurement of Goods and/or Services, and Treasury.
   3. Mandatory audits are based on provisions issued by the regulator.

B. Information and Communication Technology (ICT) audit which includes:
   1. Thematic Audits conducted based on certain themes in the scope of ICT management including Loan Origination Consumer application, Cash Management System applications, and Cloud System Environment.
   2. Mandatory audits are based on provisions issued by the regulator.

C. Special Audits for suspected fraud or certain purposes.

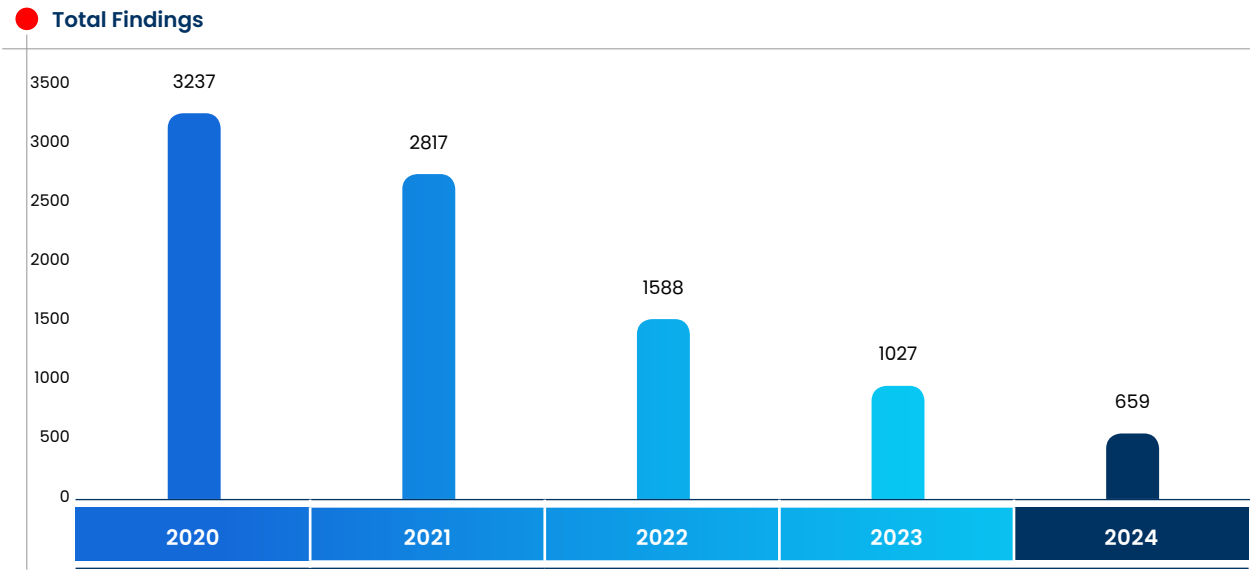
D. Internal Quality Audit (AMI) ISO certification for work units that have been certified to ISO 9001:2015 (Quality Management Standards), ISO 37001:2016 (Anti-Bribery Management System, ISO 37301:2021 (Compliance Management System).

The following are details of the audit implementation during the period January to Desember 2024:

Table of Realization of the Internal Audit Work Program

No.	Description	Target	Realization	% Achievement
A.	General Audit	72	72	100.00%
B.	Information & Communication Technology Audit	18	19	105.56%
C.	Special Audit	0	20	100.00%
D.	Audit Standar ISO	31	37	119.35%
	TOTAL	**121**	**148**	**122.31%**

Audit activities during the period of January to December 2024 resulted in 659 audit findings as presented in the following graph of audit findings for the last 5 (five) years:



MONITORING THE AUDIT RESULTS FOLLOW-UP

Follow-up on audit findings is carried out by the auditee. The results of the follow-up implementation are reported to the Head of IAD and then evaluated to see whether the follow-up is in accordance with the intended purpose. Follow-up that has been completed will be declared "completely followed-up" and informed to the auditee and the Board of Directors. As for follow-ups that have not been completed and are still in "pending item" status, the auditee is asked to complete them with the necessary explanation and will be reported by the Head of IAD to the Board of Directors. Throughout 2023, follow-ups on audit findings have been carried out from the audit results for 2021, 2022 and 2023 with a resume of audit follow-ups presented in the following table:

Table of Follow-Ups of the Audit Results Based on Due Date for Completion

No.	Audit Results	Total findings	Completed		Not yet due		% The Completion of readiness of Findings
			Total	%	Not yet due	due	
1	2	3	4	5=4/3	6	7	8=4/(4+7)
I.	**INTERNAL AUDIT DIVISION**						
I.1.	**YEAR 2024**						
General Audit of branch office		358	338	94.41%	20	0	100.00%
	General Audit of Sharia branch office	87	54	62.07%	33	0	100.00%
	General Audit Division and Regional office	133	47	35.34%	86	0	100.00%
	ICT Audit	81	46	56.79%	35	0	100.00%
	Sub Total	659	485	73.60%	174	0	100.00%
I.2.	**YEAR 2023**						
	General Audit of branch office	558	558	100.00%	0	0	100.00%
	General Audit of Sharia branch office	169	169	100.00%	0	0	100.00%
	General Audit Division and Regional office	162	162	100.00%	0	0	100.00%
	ICT Audit	138	138	100.00%	0	0	100.00%
	Sub Total	1027	1027	100.00%	0	0	100.00%
I.3.	**TAHUN 2022**						
	General Audit of branch office	908	908	100.00%	0	0	100.00%
	General Audit of Sharia branch office	217	217	100.00%	0	0	100.00%
	General Audit Division and Regional office	337	337	100.00%	0	0	100.00%
	ICT Audit	134	134	100.00%	0	0	100.00%
	Sub Total	1596	1596	100.00%	0	0	100.00%
I.4.	**TAHUN 2021**						
	General Audit of branch office	1674	1674	100.00%	0	0	100.00%
	General Audit of Sharia branch office	452	452	100.00%	0	0	100.00%
	General Audit Division and Regional office	266	266	100.00%	0	0	100.00%

No.	Audit Results	Total findings	Completed		Not yet due		% The Completion of readiness of Findings
			Total	%	Not yet due	due	
1	2	3	4	5=4/3	6	7	8=4/(4+7)
	ICT Audit	425	425	100.00%	0	0	100.00%
	Sub Total	2817	2817	100.00%	0	0	100.00%
	Total Internal Commitment	**6099**	**5925**	**97.15%**	**174**	**0**	**100.00%**
II.	EXTERNAL FINDINGS						
II.1.	THE FINANCIAL SERVICE AUTHORITY (OJK)						
	Inspection report IT of Financial Services Authority (OJK) Examination 2021	148	148	100.00%	0	0	100.00%
	2021 2021 OJK's general inspection report	147	147	100.00%	0	0	100.00%
	2022 OJK's general inspection report	203	203	100.00%	0	0	100.00%
	2023 OJK's general inspection report	246	245	99.59%	1	0	100.00%
	2024 OJK's general inspection report	446	266	59.64%	180	0	100.00%
	Total of OJK Findings	1190	1009	84.79%	181	0	100.00%
II.2.	BANK INDONESIA						
	IT and Non IT general inspection of BI 2021	40	40	100.00%	0	0	100.00%
	2022 LBUT Thematic KHP	52	52	100.00%	0	0	100.00%
	Total of BI Findings	92	92	100.00%	0	0	100.00%
II.3.	THE SUPREME AUDIT AGENCY OF THE REPUBLIC OF INDONESIA (BPK RI)						
	Management of special fee standards (SBK) and subsidies for advance payments (SBUM) in 2021	20	20	100.00%	0	0	100.00%
	Management of special fee standards (SBK) and subsidies for advance payments (SBUM) in 2022	52	42	80.77%	0	10	80.77%
	Commercial Credit Management, Investment, and Operational Report 2023	137	0	0.00%	137	0	100.00%
	Management of special fee standards (SBK) and subsidies for advance payments (SBUM) in 2024	7	0	0.00%	7	0	100.00%
	Total Findings of BPK RI	216	62	28.70%	144	10	86.11%
II.4.	FINANCIAL AND DEVELOPMENT SUPERVISORY AGENCY OF REPUBLIC OF INDONESIA (BPKP RI)						
	Placement of Funds for the 2022 national economic recovery program	3	3	100.00%	0	0	100.00%
	Review of PKH social assistance program, the Staple Food Program, and direct cash assistance(PLT) in 2022	3	3	100.00%	0	0	100.00%
	Review of the program to Increase the Use of Domestic Products (P3DN) in the Context of the Proud Movement Made in Indonesia in 2022	16	16	100.00%	0	0	100.00%

No.	Audit Results	Total findings	Completed		Not yet due		% The Completion of readiness of Findings
			Total	%	Not yet due	due	
1	2	3	4	5=4/3	6	7	8=4/(4+7)
	Review of PKH Social Assistance and Basic Necessities 2019 to 2022	2	2	100.00%	0	0	100.00%
	Total Findings of BPKP RI	24	24	100.00%	0	0	100.00%
II.5.	**PUBLIC ACCOUNTING FIRM (KAP)**						
	Management Letter for the financial statements for the position of December 31, 2021	76	76	100.00%	0	0	100.00%
	Management Letter for the financial statements for the position of June 30, 2022	65	65	100.00%	0	0	100.00%
	Management Letter for the financial statements for the position of December 31, 2022	72	72	100.00%	0	0	100.00%
	Management Letter for the financial statements for the position of December 31, 2023	80	80	100.00%	0	0	100.00%
	Total Findings of KAP	293	293	100.00%	0	0	100.00%
II.6.	**PWC**						
	Internal Audit Function Review Services 2023	17	17	100.00%	0	0	100.00%
	Total Findings of PWC	17	17	100.00%	0	0	100.00%
	Total of External Findings	**1832**	**1497**	**81.71%**	**325**	**10**	**99.34%**
	Total Internal and External Audit Findings	**7931**	**7422**	**93.58%**	**499**	**10**	**99.87%**

THE IMPLEMENTATION OF MEETINGS OF THE INTERNAL AUDIT DIVISION WITH THE BOARD OF DIRECTORS AND THE AUDIT COMMITTEE

Referring to the Internal Audit Charter, the Internal Audit Division regularly holds meetings with the Board of Directors and attends invitations to meetings with the Board of Commissioners and/or the Audit Committee in order to report on the implementation of the duties of the Internal Audit Division. Throughout 2023, the Internal Audit Division has held meetings with the Board of Directors and the Audit Committee as follows:

Implementation of Internal Audit Division Meetings with the Board of Directors

No.	Date	Discussion
1.	March 13, 2024	CEO Town Hall Meeting
2.	April 01, 2024	Meeting on the Discussion of Internal Control
3.	April 04, 2024	Meeting on the Discussion of Audit Result
4.	April 05, 2024	Meeting on the Discussion of Internal Control
5.	April 30, 2024	Meeting on the Discussion of Internal Control
6.	June 07, 2024	Operations & Customer Experience Forum
7.	June 11, 2024	Meeting on the Discussion of Performance Review
8.	June 12, 2024	Meeting on the Discussion of Audit Result
9.	June 23, 2024	Meeting on the Discussion of Internal Control
10.	June 24, 2024	Kick Off RJPP 2025-2029

No.	Date	Discussion
11.	June 24, 2024	Meeting on the Discussion of Internal Control
12.	July 02, 2024	Meeting on the Discussion of Audit Result
13.	July 08, 2024	Meeting on the Discussion of Internal Control
14.	July 09, 2024	Meeting on the Discussion of Internal Control and Internal Regulation Review
15.	July 17, 2024	Meeting on the Discussion of Audit Result
16.	July 23, 2024	Operational Risk Forum
17.	August 01, 2024	Meeting on the Discussion of Audit Result
18.	August 06, 2024	Meeting on the Discussion of Audit Result
19.	August 14, 2024	Meeting on the Discussion of Audit Result
20.	August 16, 2024	Meeting on the Discussion ICOFR
21.	August 22, 2024	RJPP 2025-2029 Workshop
22.	August 26, 2024	Meeting on the Discussion Internal Control
23.	September 16, 2024	Kick Off Meeting of Financial Report Audit
24.	September 30, 2024	Meeting on the Discussion of Audit Result
25.	October 03, 2024	Meeting on the Discussion of IAD Organizational Structure
26.	October 04, 2024	Meeting on the Discussion of Audit Result
27.	October 07, 2024	Meeting on the Discussion of IAD Organizational Structure
28.	October 09, 2024	Meeting on the Discussion of Meeting ICOFR
29.	October 14, 2024	Meeting on the Discussion of Audit Result
30.	October 22, 2024	Meeting on the Discussion of Business Control
31.	November 01, 2024	Sharing Session "Economy & Risk Outlook 2025"
32.	November 05, 2024	Meeting on the Discussion of GRC Roadmap 2025-2029
33.	November 29, 2024	Meeting on the Discussion of Internal Regulation Review
34.	December 04, 2024	Meeting on the Discussion of Internal Regulation Review
35.	December 09, 2024	Meeting on the Discussion of Internal Regulation Review
36.	December 10, 2024	Meeting on the Discussion of Internal Control

Implementation of Internal Audit Division Meetings with the Audit Committee

No.	Date	Agenda
1.	January 22, 2024	Pembahasan Annual Audit Plan tahun 2024
2.	February 05, 2024	Pembahasan Strategi Anti Fraud
3.	March 20, 2024	Rapat Pembahasan Management Letter
4.	May 15, 2024	Rapat Pembahasan Laporan Kegiatan IAD Triwulan I 2024
5.	July 01, 2024	Rapat Pembahasan Tindak Lanjut Hasil Audit
6.	August 05, 2024	Rapat Pembahasan Laporan Kegiatan IAD Triwulan II 2024
7.	August 12, 2024	Rapat Pembahasan Strategi Anti Fraud
8.	August 28, 2024	Rapat Pembahasan Review Peraturan Internal
9.	September 04, 2024	Rapat Pembahasan Tugas dan Fungsi Audit Internal
10.	September 30, 2024	Rapat Pembahasan Review Peraturan Internal dan Data Analytics
11.	October 14, 2024	Rapat Pembahasan Hasil Audit
12.	October 28, 2024	Rapat Pembahasan Review Peraturan Internal
13.	November 06, 2024	Rapat Pembahasan Review Peraturan Internal
14.	November 11, 2024	Rapat Pembahasan Laporan Kegiatan IAD Triwulan III 2024
15.	November 25, 2024	Rapat Pembahasan Limitied Review Laporan Keuangan
16.	December 2, 2024	Rapat Internalisasi Kebijakan Internal Control Over Financial Reporting (ICOFR)

ASSURANCE REVIEW OF INTERNAL AUDIT

Since December 2017, the Internal Audit Division of Bank BTN has succeeded in upgrading the ISO 9001:2008 quality standard to ISO 9001:2015. Periodically, surveillance audits have been carried out by external auditors to assess the Internal Audit Division's compliance with the ISO 9001: 2015 quality standard.

Table of Surveillance Audit Implementation for ISO 9001:2008 and ISO 9001:2015 Certification

No.	External Audit	Year	Description
1.	PT SGS	2022	The implementation of surveillance audit for ISO 9001:2015 certification by PT SGS External Audit
2.	PT SGS	2023	The implementation of surveillance audit for ISO 9001:2015 certification by PT SGS External Audit
3.	PT SGS	2024	The implementation of surveillance audit for ISO 9001:2015 certification by PT SGS External Audit

The review of the implementation of the bank's internal audit function as regulated in OJK Regulation No.01/POJK.03/2019 in assessing the conformity of the internal function with regulations, standards and codes of ethics, as well as efficiency and effectiveness has been carried out by a minimum of 3 (three) independent assessors.) once a year with the following description:

Table of Independent Assessors Regarding Assessment of Audit Implementation

No.	External Audit	Year	Description
1.	PT Deloitte Touche Tohmatsu	2018	The implementation of the gap analysis review process for policies, procedures, and methodologies as well as the implementation of audits of SPFAIB best practices every 3 years by the External Auditor.
2.	PT KPMG Siddharta Advisory	2020	The implementation of the gap analysis review process for policies, procedures, and methodologies as well as the implementation of audits of SPFAIB best practices every 3 years by the External Auditor.
3.	PT PricewaterhouseCoopers (PWC)	2023	The implementation of the gap analysis review process for policies, procedures, and methodologies as well as the implementation of audits of best practices for the Standards for Implementing Internal Audit Functions in Commercial Banks every 3 years by the External Auditor.

Risk Management Work Unit

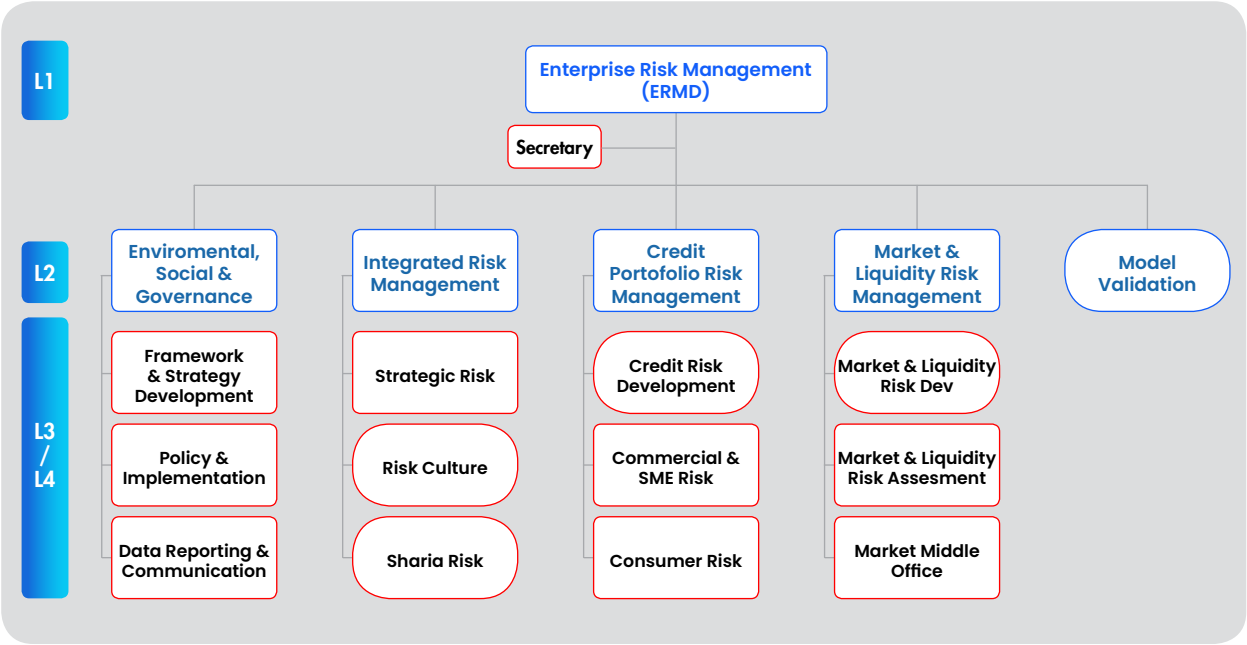
The Risk Management Work Unit is a work unit that is directly responsible to the Director who oversees the Risk Management function and is independent of the Operational Work Unit which is a risk-taking unit, the Internal Audit Work Unit and the Compliance Work Unit. Currently, the Risk Management Unit consists of 4 (four) divisions, namely Enterprise & ESGRisk Management Division, Digital & Operations Risk Management Division, Wholesale Credit Risk Division, and Retail Credit Risk Division. The company's risk governance which is based on GCG principles is realized from the involvement of all Company organs in managing risk management. This can be seen from the composition of the Company's risk management organization.

The Board of Commissioners through Risk Monitoring Committee meetings and the Board of Directors through Risk Management Committee meetings are responsible for ensuring that the implementation of Risk Management is adequate in accordance with the characteristics, complexity and risk profile of the company. The Board of Commissioners and Directors play an active role in the risk management process in order to mitigate the company's risks through the Quality of Risk Management Implementation including risk governance, risk management framework, risk management process and the adequacy of the management information system as well as the adequacy of the internal control system.

The Company's risk governance which is based on the principles of Good Corporate Governance is realized from the involvement of all Company organs in managing risk management. This can be seen from the composition of the company's risk management organization. The Board of Commissioners and Directors are responsible for ensuring that the implementation of Risk Management is adequate in accordance with the characteristics, complexity and risk profile of the company. The Board of Commissioners and Directors play an active role in the risk management process in order to mitigate the company's risks through the Quality of Risk Management Implementation which includes risk governance, risk management framework, risk management process, adequacy of human resources, and the adequacy of the risk management information system, as well as the adequacy of the control system risk.

Risk Management Unit Structure

The Risk Management Unit (SKMR) of the Company consists of Enterprise & ESG Risk Management Division (ERMD) and Digital Operation Risk Management Division (DORD), each led by a Division Head who is directly responsible to the Risk Management Director. The Organizational Structure of Enterprise & ESG Risk Management Division consists of Market & Liquidity Risk Management Department, Credit Risk Management Department, Integrated Risk Management Department, ESG Department and Model Validation.



The Credit Portfolio Risk Management Department functions to ensure the effectiveness of the company's Credit Risk management, which focuses primarily on providing credit or housing financing, whose asset portfolio is dominated by Home Ownership Credit (KPR) which is influenced by changes in the external business climate.

The Market & Liquidity Risk Management Department functions to ensure the effectiveness of Market Risk and Liquidity Risk management which, among others, establishes a plan that will be carried out if the Company experiences financial stress conditions that can jeopardize business continuity.

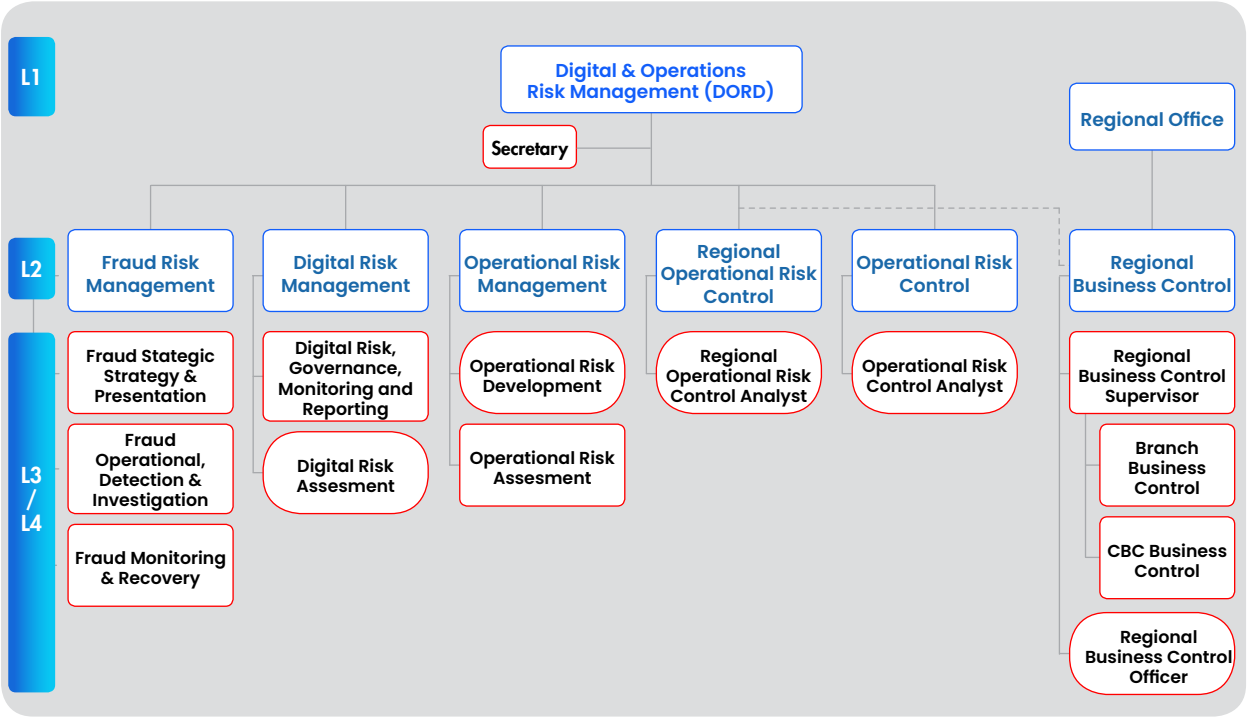
The Integrated Risk Management Department ensures the effectiveness of Strategic Risk management and functions to coordinate and ensure the process of integrating risk management with strategic planning, performance measurement and providing incentives in order to increase shareholder value, increase investor confidence, support the decision making process and increase the efficiency of capital use.

The ESG Department functions as a control tower for ESG activities so that they are in line with the Company's ESG roadmap and framework. Control towers are carried out on business and operational activities to support the achievement of sustainable development goals which include, among other things, managing environmental impacts, overcoming social problems and maintaining responsible and ethical governance standards in banking operations.

Model Validation serves to validate and test risk models to ensure that the models are accurate, reliable, and comply with applicable regulations. In addition, it also plays a role in ensuring that the management of each risk is managed in accordance with the ISO 9001:2015 Quality Management Standard.

The Organizational Structure of Digital & Operations Risk Management Division (DORD) consists of Fraud Risk Management Department, Digital Risk Management Department, Operational Risk Management Department, Regional Operational Risk Control Department, and Operational Risk Control Department.

Structure of Operational and Digital Risk Management Unit



The Fraud Risk Management Department functions to coordinate and monitor the development, formulation, implementation, and review of the Fraud Risk Appetite, Risk Tolerance, and risk limits in accordance with regulations and business needs, as well as preparing reports on the implementation of anti-fraud strategies.
The Digital Risk Management Department is responsible for ensuring the effectiveness of IT, Digital, and Cyber risk management related to the technological solutions used by the company to achieve secure and reliable technology services. There are six risk domains covered: Information and Cyber Security risk; IT Service Delivery, Resilience, and Continuity risk; IT Third-Party risk; Data Quality and Data Privacy risk; IT Project Delivery risk; and IT Regulatory Compliance risk. Risk management is carried out through a framework that aligns with industry best practices and is integrated with the IT service lifecycle to achieve optimal results.

The Operational Risk Management Department ensures the overall effectiveness of operational risk management for the bank, including coordinating with the Operations Risk Controller Management and Digital Risk Management. Additionally, it also manages Business Continuity Management (BCM) bankwide to manage operational risks from external factors.

The Regional Operational Risk Control Department serves as a control tower for overseeing and evaluating the implementation of internal controls at Branch Offices (KC) and Commercial Banking Centers (CBC) conducted by Branch Business Control (BBC) and Commercial Banking Center – Business Control (CBC-BC), which are monoline organs within the Regional Office.

Since 2015, the implementation of management activities has implemented and obtained ISO 9001:2008 certification which was upgraded to ISO 9001:2015 in May 2018. Certification is also continuously maintained every year and an annual audit is carried out on the implementation of ISO 9001:2015 certification while continuing to strengthen commitment to continue working in accordance with implemented quality standards by making continuous improvements, fostering a risk culture and encouraging the implementation of effective risk management at all levels of the company's organization and business activities in accordance with applicable regulations

Currently ISO 9001:2015 has been used by various organizations throughout the world, which can help them run more efficient and profitable operations. ISO

9001:2015 provides a framework for more consistent business performance, excellent service and continuous improvement over a long period of time. ISO 9001:2015 provides many advantages and capabilities in terms of business scale in recent years. This standard is a very helpful tool in company development and makes the Bank BTN organization more resilient.

Duties and Responsibilities of the Risk Management Work Unit

The Risk Management Work Unit is a work unit that is directly responsible to the Director who oversees the Risk Management function and is independent of the Operational Work Unit which is a risk-taking unit, the Internal Audit Work Unit and the Compliance Work Unit. The responsibilities of the Risk Management Work Unit include:

1. Provide input to the Board of Directors in preparing policies, strategies and Risk Management frameworks.
2. Develop procedures and tools for risk identification, measurement, monitoring and control
3. Design and implement the tools needed to implement Risk Management.
4. Monitor the implementation of Risk Management policies, strategies and frameworks recommended by the Risk Management Committee and approved by the Board of Directors.
5. Monitoring risk positions/exposures as a whole, as well as per risk, including monitoring compliance with established risk tolerances and limits.
6. Conduct stress testing to determine the impact of the implementation of Risk Management policies and strategies on the portfolio or overall performance of the Bank.
7. Review proposed new activities and/or products developed by other units. The assessment focuses primarily on aspects of the Bank's ability to manage new activities and/or products including the completeness of the systems and procedures used and their impact on the Bank's overall risk exposure.
8. Provide recommendations to business work units and/or to the Risk Management Committee regarding the implementation of Risk Management, including regarding the amount or maximum risk exposure that can be maintained and carry out escalations as needed.
9. Evaluate the accuracy and validity of data used by the Company to measure Risk for Banks that use models for internal purposes.
10. Prepare and submit Risk profile reports to Regulators, Board of Commissioners, Directors and Risk Management Committee periodically or at least quarterly. The frequency of reports is increased if market conditions change rapidly.
11. Carry out regular reviews with a frequency adjusted to the Company's needs, to ensure:
    a. adequacy of the Risk Management framework;
    b. accuracy of Risk assessment methodology; And
    c. adequacy of the Risk Management information system.
12. Have an integrated Risk Taxonomy for the Company and subsidiaries in accordance with the needs of monitoring the performance targets of the Company and subsidiaries.
13. The organizational structure, duties and responsibilities as well as other matters including the work procedures of the Risk Management work unit are regulated in a separate internal regulation.
14. Implement ESG risk management, including climate risk and its impact on society, and establish a governance framework to ensure that these risks are managed in an integrated manner between business units, risk management units, and operational units.
15. Provide the Board of Directors with up-to-date information on risks and business developments related to climate change to help the Board of Directors implement supervisory activities more optimally.
16. Implement fraud risk management through 4 pillars of Anti-Fraud strategy (Prevention, Detection, Investigation, Monitoring & Recovery).
17. Implement IT, Digital, and Cyber risk management.

Profile of the Head of the Risk Management Unit

The Head of the Enterprise Risk Management Division also acts as secretary of the Risk Management Committee under the Board of Directors, held by Wilson Arafat based on the Board of Directors Decree No. 93/KUASA/DIR/2024 dated May 2, 2024 and has served until now.



Wilson Arafat
Head of Enterprise Risk Management Division

Indonesian Citizen,
52 years ols as of December 2024,
domiciled in Jakarta.

Educational Background
Master of Management, Gadjah Mada University (2004).

Training and Certification
- Risk Management Certification Level 6 by LSPP (2024)
- BSE - Chief Financial Officer School (2024)
- BSE Business Essential - Finance For Executive Stream (2024)
- Financial Acumen Columbia Business School (2024)
- Seminar on Sustainable Finance Forum 2023 – Dubai (2023)
- Indonesia Risk Management Outlook 2023 (2022)
- Refreshment Program: Implementation of Basel III Reform Basel IV for Calculation of ATMR on Credit Risk (2022)
- Certification for Credit Risk Management (2022)
- Market Risk & Middle Office Function (2021)
- Risk Management Certification by LSPP Level 4 (2021),
- Business Strategy Facing the Impact of Cvd VC (2020)
- Executive Development Program (2019)
- Company Guidelines on Governance Policy (2018)
- The Positive Leader – DCO Transformation - Hong Kong (2017)
- GRC Professional Certificate – Arizona (2016)
- 2015 Asean Corporate Conference: Governance Transformation in Asean Performance and Priorities – Philippines (2015)
- Integrated Governance, Risk Management, and Compliance - Australia (2014)
- 8th International Conference on Corporate Governance – UK (2010)

Work Experience
- Started his professional career at BTN since 1998 through the Officer Development Program path, serving as an Executor in the Financial Report Analysis and Reconciliation Work Unit.
- Since 2008, he has served as the head of section in charge in the Policy Section Work Unit.
- From 2010 to 2011, he held Good Corporate Governance Implementation with his last position as GCG Implementation & Monitoring Department Head.
- He served as Superintendent Spec Curiculum & Program Development and Senior Associate Culture Specialist in the Human Capital Division (2011-2013).
- From 2013 to 2016, he served as Corporate Governance Department Head in the Compliance & Governance Division.
- From 2017 to 2018, he held the Transformation Project with his last position as Transformation Management Office Head in the Transformation & Partnership Management Division.
- His last position was Management Division Head of Procurement & Fixed Asset which was held from 2019 to 2021.

Legal Basis for Appointment
Board of Directors Decree No. 93/KUASA/DIR/2024 dated May 2, 2024

The Head of the Digital & Operations Risk Management Division is held by Agus Sumaryono based on the Board of Directors Decree No. 711/DIR/2024 dated August 1, 2024 and has served until now.



Agus Sumaryono
Head of Digital & Operations Risk Management Division

Indonesian Citizen,
54 years ols as of December 2024,
domiciled in Bekasi.

Educational Background

Bachelor of Civil Engineering, Sebelas Maret University (1994)

Training and Certification

- Certification of Risk Management Level 5 by LSPP (2024)
- BTN Leadership Forum 2 – 2024 (2024)
- KPK Family with Integrity 2024 (2024)
- Expert Talk Session: Creating Executive (2024)
- SOEs Competency Deepening Program (2024)
- Counter-Terrorism Socialization (2023)
- Webinar on Cyber Crime Security Awareness (2023)
- Training on Media Handling (2022)
- Certification of Senior Credit Officer (2022)
- Refsh. Consumer Credit & Peny. Dokpok (2022)
- Workshop on Business Judgment Rule (2021)
- Certification of Integrity Builder Expert by LSP (2021)
- Webinar on Digital Leadership Readiness (2021)
- BTN-LPPI Webinar: Business Strategy in Responding to the Impact of Covid-19 (2020)
- General Manager Development Prog. Phase-2 (2020)
- Business Strategy in Facing the Impact of Cvd VC (2020)

Work Experience

- Manager of Mataram Branch (1998)
- Head of Building Management at the Building Management Work Unit (2009)
- Policy Planning & Budgeting Manager at the Logistic & Network Division Work Unit (2010)
- Policy Planning And Budgeting Officer at the Procurement & Fixed Asset Management Division (2011)
- Construction Loan Proc & Appr Officer at the Commercial Banking Division (2011)
- Contractor Relation Management Officer at the Commercial Banking Division (2013)
- Commercial Non-Housing Loan RM I at the Commercial Banking Division (2013)
- Business Services Department Head at the Commercial Lending Division (2014)
- Deputy Branch Manager of Bekasi branch office (2016)
- Deputy Regional Manager Support Regional Office I (2019)
- Commercial Authorized Officer at the Wholesale Credit Risk Division (2020)
- Branch Manager of Bekasi branch office (2021)
- Deputy CRD at Wholesale Credit Risk Division (2023)

Legal Basis for Appointment

Board of Directors Decree No. 711/DIR/2024 dated August 1, 2024

Competency Development in the Field of Risk Management

Types of Training and Education	Number of Participants
Classroom / Virtual Classroom	
Aligning Strategy Execution With Environmental, Social, and Governance (ESG)	1
BTN Leadership Forum 2 – 2024	1
BTN Millenial Leaders II – Kickoff	1
Business Performance Through Effective Coaching for Leaders	1
Coaching & Strategic Business Leaders	4
Millenial Leaders 2 "crafting leadership and future skill for next leaders"	1
Driving Excellence: Comprehensive Performance Cycle Training	1

Types of Training and Education	Number of Participants
BOD Talks & Meet The Expert -"Evolving in Finance: Leadership, Transformation, and Future of Banking in Indonesia"	7
Expert Talk Session "Empowering Women Leadership to Strengthen Leadership Capability"	3
Officer Development Program (ODP) Class of 63	3
Training on AML, CFT, and PFWMD	1
Education and Training on AML, CFT, and PFWMD related to Individual Risk Assessment (IRA) in 2024	1
Training of Presentation Skill	2

Types of Training and Education	Number of Participants
Provision of Risk Management Certification of KKNI Level 4	8
Basic Islamic Banking Education (PDPS)	3
Risk Maturity Index (RMI) Assessor Training Participants	2
Training on Merger Preparation, Acquisition, and Integration: Journey Towards a Seamless Transition	1
Risk Management Refreshment of KKNI Level 4 E-Learning Method	1
Risk Management Refreshment of KKNI Level 5 E-Learning Method	17
Seminar "Financial Strategy for The Youth and Gen Z in Embracing Indonesia Emas 2045"	1
SMR Competency Test of KKNI Level 4	8
Socialization of Special Policies (KK) and Technical Instructions (PT) for Personal Data Protection (PDP)	3
Performance Excellence Program: Strategies for Driving High Performance in 2024	1
Talent Acceleration Program II – Kickoff	3
Talent Acceleration Program 2 "Leadership Session"	3
Retirement Planning Webinar "Education on Old Age Security Program (JHT) and Employee Welfare and Healthy and Happy Living in Retirement"	2
Retirement Planning Webinar: "Education on Defined Benefit Pension Program and Financial Planning"	1
OJK Webinar "Building Spiritual-Based Leadership: A Holistic Approach to Business Growth and Sustainability"	4
OJK Webinar - Improving Company Performance through Artificial Intelligence	1
OJK Webinar - The Role of Innovative Credit Scoring (ICS) in Increasing Access to Funding	3
OJK Webinar "Opportunities and Challenges of Personal Data Protection in Transactions in the Digital Era"	3
OJK Webinar - Navigating the Half: "Year Roadmap to Success"	4
Workshop on ASEAN Corporate Governance Scorecard (ACGS) 2024	2
Workshop on Recording Personal Data Processing_ Record of Processing Activities (ROPA) and Personal Data Processing Impact Assessment_ Data Privacy Impact Assessment (DPIA)	1
Workshop on the Implementation of Stamp Duty Regulations	1
Young Leaders Talk "Leading with Impact, Crafting Your Success Story"	7
Webinar on Climate Risk Awareness & GHG Emission Reporting	6
Training on Climate Risk Stress Test (CRST)	16
Capacity Development Seminar on Climate Risk Integration in the Banking Risk Framework	1

Types of Training and Education	Number of Participants
The Important of Financial, Operational, and Technology Risk Mitigation to Elevate Company Value in 2024	1
Business Essential - Finance for Executive	1
Briefing on Risk Management Certification of KKNI Level 6	1
CFO School	1
SMR Competency Test of KKNI Level 6	1
OJK Webinar "How to Prevent Greenwashing in Sustainable Finance"	5
Training on Risk Based Planning & Risk Modeling	2
Certification of QRPG Scheme Risk Management	3
Strategic Business Unit (SBU) Webinar Series Empowering Business Growth by Maximizing Capabilities. Series 02 : Operation, Legal, Risk Management	1
Workshop on the Development of Profitability Measurement System	2
Training on Risk Management Trainer Level 4	1
Training on Financial and Capital Market Base on Esg & Sustainable Finance	2
SMR Competency Test of QRGP Scheme	1
Certification of the Provision of Risk Management of KKNI Level 5	4
SMR Competency Test of KKNI Level 5	4
Leadership & Impactful Future Skill	1
Provision and Competency Test for Training of Bnsp Certification Trainer (Methodology)	1
OJK Webinar "Empowering Leadership: How Women Leaders Drive Company and Institution Performance"	1
Premium ESG Investment Seminar Training "Sustainable Investment for a Thriving Future: Creating Long-Term Value and Impact for the Environment and Communities"	1
Advanced Coaching Clinic: Deepening Assessment of Taxonomy for Sustainable Finance Indonesia (TKBI)	1
Online / Self Learning	
Compliance Excellence August 2024 Edition - Procedures for Implementing Anti-Money Laundering, Countering the Financing of Terrorism, and Countering the Financing of the Proliferation of Mass Destruction Weapons (AML, CFT, and PFWMD) Programs (Managerial)	6
Compliance Excellence August 2024 Edition - Procedures for Implementing Anti-Money Laundering, Countering the Financing of Terrorism, and Countering the Financing of the Proliferation of Mass Destruction Weapons (AML, CFT, and PFWMD) Programs (Non-Managerial)	25
Compliance Excellence April 2024 Edition - Government VA Services (Managerial)	5

Types of Training and Education	Number of Participants
Compliance Excellence April 2024 Edition - Government VA Services (Non Managerial)	23
Compliance Excellence February 2024 Edition - Security & Digital Risk Awareness	26
Compliance Excellence January 2024 Edition - Special Policy & Technical Guidelines for Accounting Activities	26
Compliance Excellence July 2024 Edition - Special Policy on Conflict of Interest Guidelines (Managerial)	5
Compliance Excellence July 2024 Edition - Special Policy on Conflict of Interest Guidelines (Non-Managerial)	26
Compliance Excellence June 2024 Edition - Prohibition of Gambling Activities (Managerial)	5
Compliance Excellence June 2024 Edition - Prohibition of Gambling Activities (Non-Managerial)	23
Compliance Excellence March 2024 Edition - Gratification Control Program and SMAP ISO 37001:2016 Policy (Managerial)	5
Compliance Excellence March 2024 Edition - Gratification Control Program and SMAP ISO 37001:2016 Policy (Non-Managerial)	21
Compliance Excellence May 2024 Edition - BranchFX Foreign Exchange Transactions at Branch Offices (Managerial)	5
Compliance Excellence May Edition 2024 - Foreign Exchange Transactions BranchFX at Branch Office (Non-Managerial)	23
Compliance Excellence October 2024 Edition - Bancassurance Product Marketing (Managerial)	6
Compliance Excellence October 2024 Edition - Bancassurance Product Marketing (Non-Managerial)	25
Compliance Excellence September 2024 Edition - Data Privacy Awareness (Managerial)	6
Compliance Excellence September 2024 Edition - Data Privacy Awareness (Non-Managerial)	25

Types of Training and Education	Number of Participants
Internalization of ESG (Environment, Social, and Governance) Awareness	28
Internalization of IT Regulation Policy	26
Internalization of Public Information Disclosure (KIP)	31
Internalization of BTN Cash Management Services	28
Internalization of IT, Digital, and Cyber Risk Management 2024	31
Internalization of BTN's New Grading System	28
Internalization of SLE Index Achievement 2024	25
Internalization of Customer Data Management (CIF)	31
Internalization of Commercial Credit Rescue and Settlement	28
Internalization of Legal Clinic Podcast 2024	27
Internalization of Corporate Loan Process (Corporate Loan)	31
Internalization of Respectful WorkPlace (RWP) 2024	26
Internalization of Sahabat Transformasi Episode 2	31
Internalization of Transformation 2024	31
Understanding Internal Regulations - BTN Internal Regulation Architecture	26
Refreshment BTN Properti 2024	20
Refreshment BTN Smart Residence	29
Socialization of Digital Risk Awareness & Cyber Trend	27
Socialization of Profitability Measurement System	27
Socialization of Easy in BTN Smart Residence Program	23
Socialization of Umbrella Campaign Bale by BTN	31
Total Education and Training Participants	1036

Risk Management Certification

No.	Number of Employees		SMR Level Mapping					Suitability
			Not SMR yet	Level 4	Level 5	Level 6	Level 7	
1.	Mandatory Level 4	2,907	160	1,172	1,574	1	-	94.50%
2.	Mandatory Level 5	432	3	7	394	25	3	97.69%
3.	Mandatory Level 6	9		-	-	6	3	100.00%
4.	Mandatory Level 7	14				-	14	100.00%
Total Employees		**3,362**	**163**	**1,179**	**1,968**	**32**	**20**	**94.94%**

Description:

- Employees who are required to be certified but have not yet been certified according to their leve
- Employees who are required to be certified and comply with their level
- Employees who are required to be certified and already have certification at a level above that required

Implementation of Risk Management Work Unit Tasks in 2024

In carrying out tasks during 2024, apart from the strategic initiative pillars mentioned above, the implementation of risk management has also made several improvements as follows:

Determination of Risk Appetite Statement (RAS) and Risk Limits
In preparing Risk Management policies and strategies, the Company's Board of Directors has established a Risk Appetite Statement (RAS) and other risk limits. RAS is reviewed annually or at any time taking into account changes in the Company's business plans and objectives as well as changes in business environmental conditions. RAS is used as an objective guide in making strategic decisions related to risk management and as a tool for Management in implementing good business governance. Next, RAS is reduced to the risk limit for each risk indicator. Determination of RAS and risk limits is carried out by taking into account the level of risk to be taken as well as the Company's overall strategy and targets. The risk limits set include overall risk (composite), per risk type, and per functional activity. The determination of risk limits is used as a guide for Work Unit activities to manage the type and amount of risk that is acceptable.

Recovery Plan
The preparation of Systemic Company Recovery Action Plan as one of the Systemic Banks in Indonesia, the Company has an obligation to prepare a Recovery Action Plan document as regulated in the OJK Regulation No. 5 of 2024 concerning Determination of Supervision Status and Handling of Commercial Bank Problems. The Action Plan document prepared contains mechanisms that are expected to prevent, restore and/ or improve the Bank's financial condition as a result of the financial crisis or other financial market disruptions which impact capital, liquidity, profitability, and asset quality which endanger the Company's business continuity. The Company periodically updates the Action Plan Document (Recovery Plan) as one of the plans in sustainable financial planning. On November 30 2024 the Company submitted its 2025 Action Plan (Recovery Plan) to the Regulator.

Resolution Plan Update
The preparation of the Resolution Plan for Systemic Companies has been submitted by the Deposit Insurance Corporation (LPS) as a Company that is obliged to prepare a Resolution Plan document in accordance with Deposit Insurance Corporation Regulation No. 2 of 2024 concerning General Bank Resolution Plans. The Resolution Plan document prepared contains information about the Company and resolution strategies that are one of the considerations for the Deposit Insurance Corporation in handling or resolving banks that are designated as failed banks. In 2024, the Company updated the Company Resolution Plan.

Implementation of Climate Risk Stress Test
The Company has implemented a Climate Risk Stress Test in accordance with the Climate Risk Stress Test Guidelines issued by the Financial Service Authority (OJK) in 2023. The results of the Climate Risk Stress Test implementation contain calculations regarding the impact analysis of transition risk scenarios, physical risk scenarios, and climate change mitigation plans.

Review of Risk Management Policies
In accordance with OJK Regulation No. 18/POJK.03/2016 dated March 16, 2016 concerning the Implementation of Risk Management for Commercial Banks, in managing risk banks are required to implement risk management effectively. To implement risk management effectively, the Company has developed a risk management policy which is contained in a risk management policy and at least every year a review and/or update of several risk management policies is carried out so that they are easily understood by risk owners and risk managers as a guide in implementing them. The Company has aligned its internal policy structure in accordance with the Transformation of Policy and Procedure Architecture where policies and procedures are adjusted to the policy hierarchy from the highest to General Policy, Special Policy and Technical Regulations. The Company has a Policy and Procedures Work Unit to periodically review and monitor Policies and Procedures.

Implementation of Basel III Credit Risk Minimum Capital Reform Standard Approach
The Company has implemented the calculation of Risk Weighted Assets (RWA) for Credit Risk in accordance with OJK Circular Letter No 24/SEOJK.03/2021 concerning Calculation of Risk Weighted Assets for Credit Risk using the Standard Approach for Commercial Banks. Changes in the calculation methodology in these provisions include changes to more granular risk weights and in a larger number of buckets. Apart from that, there is also a more diverse classification of portfolio categories and the need to carry out due diligence on counterparties to ensure understanding of the risk profile and characteristics of counterparties so that determining risk weights does not only depend on external ratings.

Preparation for Implementing Minimum Capital Market Risk Standard Approach

The Company has implemented the OJK circular letter No. 23/SEOJK.03/2022 concerning Calculation of Risk-Weighted Assets for Market Risk for Commercial Banks since January 2024.

Implementation of Low Emission Homes

In 2024, the Company took the initial step by launching a pilot project that utilized at least 10% environmentally friendly materials. The use of these materials included innovative materials, such as floor decking containing 3.6 kg of plastic waste, and paving blocks containing 2 kg of plastic waste per square meter. This innovation not only helped reduce plastic waste, but also improved the quality of building materials used for more durable and efficient homes.

Implementation of Risk Maturity Index Assessment

In accordance with the Regulation of the Minister of SOEs Number PER-2/MBU/03/2023 concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises which has been issued through SK-8 of the Minister of SOEs, the Company is required to conduct a risk maturity index assessment. In 2024, the Company conducted a risk maturity index assessment conducted by an independent party which received an assessment with a score of 3.5 **(good practice phase)**.

Application of Minimum Capital Operational Risk Standard Approach

In order to implement OJK Circular Letter No. 6/SEOJK.03/2020 concerning Calculation of Risk-Weighted Assets for Operational Risk Using the Standard Approach for Commercial Banks has been implemented since 1 January 2023, so the Company periodically reviews the recording of operational risk loss and recovery data.

Implementation of the Early Warning System (EWS) for the MSME, Commercial and Corporate Credit Segments

Early Warning System is a mechanism or system for detection or recognition of early signs or symptoms which are expected to influence developments in the progress and decline of the debtor's business conditions. The Early Warning System is implemented to minimize and prevent losses due to bad credit, so the Bank must implement an effective and sustainable system for monitoring the credit facilities that have been provided. In this case, the Risk Management Work Unit together with related business units routinely monitors portfolio quality and early warning indicators for the asset quality of the credit portfolio. It is hoped that this effort can be used to monitor MSME, Commercial and Corporate credit debtors so as to provide information in the form of early warnings about the possibility of debtors experiencing default.

Preparation and Implementation of Portfolio Guideline for Commercial, Corporate and Financial Institutions Segments

BTN's strategic steps in strengthening financing risk management aim to control the composition of the credit portfolio while ensuring healthy credit portfolio growth. In this effort, BTN implements credit risk management through the Portfolio Guideline to reduce credit concentration risk. This Portfolio Guideline is a strategic initiative designed to ensure that financing distribution always takes into account current macroeconomic conditions, especially in certain sectors that are considered to still have financing feasibility. In addition, this initiative includes the identification of priority sectors that support the development of the company's business efforts. Aspects that are the main focus include analysis and monitoring of NPLs per industrial sector, determination of financing limits per sector, and growth prospects for the industrial sector. Currently, BTN is preparing the 2025 Portfolio Guideline which includes the Small and Medium Enterprises (SME) segment and sharia commercial financing, in order to increase the effectiveness of portfolio risk management and support sustainable business development.

Development of Credit Scoring Model (CSM) for the Small Medium Enterprise (SME) Segment

In an effort to minimize the risks that the Company will accept in providing credit to the SME segment, a Credit Scoring Model (CSM) is needed This SME Credit Scoring Model is designed to help analyze and quantify the eligibility of prospective debtors with recommendations in the form of High Risk or Low Risk, which has been integrated from the data entry process through BTNLaku to the Decision Engine stage. This model aims to improve efficiency, accuracy in credit decision making and support the principle of prudence (prudential banking) to ensure a quality SME credit portfolio.

Strengthening Regional Business Control (RBC), Branch BusinessControl (BBC), Commercial Banking Center Business Control(CBC-BC), and Regional Loan Processing Center Business Control (RLPC-BC)

The Company has an organ to improve operational risk supervision and mitigation/prevention of operational loss by implementing the Operations Risk Controller Department in the Risk Management Work Unit and placing the Regional Business Control (RBC) organ in the Regional Office, Branch Business Control (BBC) which is a monoline Regional Office and on duty at Branch

Offices and Sharia Branch Offices, Commercial Banking Center Business Control (CBC-BC) which is a monoline Regional Office and on duty at the Commercial Banking Center (CBC) and Regional Loan Processing Center Business Control (RLPC-BC) which is a monoline Office Region and works at the Regional Loan Processing Center. Continuous strengthening of the Business Control organ has been carried out by periodically prioritizing risks (Top 10 Risks) which are reported to the Board of Directors. The Bank also plans to establish Operational Risk Control at the directorate level as part of operational risk mitigation at the directorate level.

Developing and Strengthening Governance Models

In order to strengthen model governance, the Company has developed provisions and framework regarding model governance to improve the quality of risk management implementation in the Company. In addition, by strengthening model governance, segregation of duties can be implemented in the model lifecycle, where the Company's provisions have separated functions, duties and responsibilities between model development, model operational implementation, model evaluation and validation so that model management is more independent.

IT Digital & Cyber Risk

The Company strengthens IT, digital, and cyber risk management through DORD by monitoring IT, digital & cyber risk profiles and implementing a program to strengthen digital and cyber attack risk control. The IT, digital & cyber risk profile components are developed using the applicable OJK provisions as a basis, and carrying out the necessary developments to adjust to the Company's conditions and connect with the key risk indicator matrix that has been formed. Reporting on risk profiles and key risk indicators is carried out periodically to Management to provide comprehensive visibility.

Strengthening digital and cyber attack risk control is carried out using a 3 pillar transformation approach, namely people, processes and technology..

1. People, strengthening is done through an internalization program for IT, digital & cyber risk management which aims to convey the tone at the top from the Board of Directors to all employees, and equip employees by increasing employee awareness of IT, digital & Cyber threats and how to prevent them. Through an IT, digital & cyber risk awareness program by conducting socialization through branch office visits and implementing e-learning.
2. Process, the Company has strengthened internal processes related to IT and Digital, such as conducting reviews of policies and procedures related to IT and digital, and monitoring risks on strategic IT projects.
3. Technology, the Company improves the tools and rules that have been implemented to improve the protection of the Company's computer assets and Third-Party Risk Monitoring tools.

The Board of Directors, through the Information Technology Steering Committee, carries out evaluations of IT, digital & cyber risks which are carried out through regular meetings at least 4 (four) times during the current year with one of the discussions relating to IT Key Risk Indicator (KRI) Monitoring. Furthermore, the Board of Commissioners also reviews the results of IT, digital & cyber risks once a year.

Continuing Development and Strengthening Utilization of Risk Management Tools

To strengthen the utilization of Risk Management Tools, several developments have been carried out, including:

1. Implementation of a market risk monitoring system/ interest rate risk in the banking book (IRRBB) and Liquidity Risk monitoring application.
2. Utilization of the Bloomberg Terminal to support the effective implementation of risk management in supporting the management of liquidity risk, credit risk and other risks.
3. Strengthening the role of risk management by developing Sustainability Environment Risk Management.
4. Enhancement of the Credit Scoring Model (CSM) for consumer credit.
5. Developing a Credit Scoring Model (CSM) for the SME segment.
6. Developing an Early Warning System for the Commercial and Corporate segments.
7. Re-modeling the Internal Credit Rating for the Commercial and Corporate segments.
8. Developing Collection Scoring for the Consumer segment.
9. Maintenance of ISO implementation in ERMD through Surveillance and ISO 9001:2015 Recertification in the Risk Management Work Unit to improve the quality service standards of the Risk Management Work Unit to all stakeholders.
10. Utilization of integrated Operational Risk Tools as an effort to manage operational risk in the Work Unit, including LED, RCSA, and KRI tools.
11. Conducting the creation of a Fraud Detection System application that functions as a tool that helps Company in the prevention, detection, investigation, and monitoring of fraud, especially in credit applications and transaction activities.
12. Utilization of Operational Risk data visualization in the context of risk prioritization (Top 10 Risks) which can be used by management.
13. Addition of data analytics functions as the basis for Business Control organs in carrying out internal control testing

Regular Bank Wide Risk Management Monitoring

The Bank always implements risk management in accordance with OJK Regulation No. 18/POJK.03/2016 concerning the Implementation of Risk Management for Commercial Banks where the Bank periodically carries out bankwide monitoring as evidenced by several mandatory report outputs to the Regulator including:

1. Recovery Plan;
2. Resolution Plan;
3. Leverage Ratio;
4. Risk Profile;
5. Bank Health Level;
6. Minimum Capital Requirement according to Risk Profile;
7. Liquidity Coverage Ratio;
8. Net Stable Funding Ratio;
9. Maximum Credit Granting Limit;
10. Risk Weighted Assets;
11. Report of Indonesian Green Taxonomy;
12. Taxonomy Report for Sustainable Finance;
13. Report of Sustainable Finance Action Plan (RAKB) 2025;
14. Reports to the Ministry of BUMN; And
15. Other Ad-hock reports.

ICOFR

The Company has conducted an ICOFR Diagnostic review together with an independent consultant aimed at improving internal control over financial reporting. The scope of the ICOFR Diagnostic implementation that has been carried out includes several things as follows:

1. Understanding of the corporate structure of SOEs with output in the form of corporate structure documentation, risk assessment of misstatement due to corporate structure, and proposed diagnostic procedures for governance of integrated governance processes;
2. Understanding of SOEs financial reports with output in the form of documentation of significant accounts and processes along with documentation of risk assessments for each account, and procedures for conducting ICOFR effectiveness diagnostics;
3. Implementation of ICOFR diagnostic procedures with output in the form of implementation of ICOFR diagnostic procedures, and ICOFR diagnostic results for each SOEs; and
4. Preparation of a diagnostic gap improvement roadmap with output in the form of improvement recommendations and an ICOFR improvement implementation roadmap prepared together with the Board of Directors and Board of Commissioners/ Supervisory Board.

In the implementation of OJK Regulation No. 15 of 2024 concerning the Integrity of Bank Financial Reporting, the Company currently has an Internal Policy related to ICOFR. Meanwhile, regarding the formation of a Special Work Unit (UKK), it is still in the evaluation process.

ANTI FRAUD STRATEGY

SesuFollowing the OJK Regulation No. 12 of 2024 concerning the Implementation of Anti-Fraud Strategy (SAF) for Commercial Banks, BTN has a roadmap for developing an Anti-Fraud Strategy (SAF) for the next 3 years (2024-2026), where the preparation of the roadmap is carried out based on the 4 pillars of OJK which are developed in 10 aspects, namely (1) Organization, (2) Strategy & Policy, (3) Procedure and Governance, (4) Process, (5) Fraud Investigation (6) System, (7) Use of Data, (8) Use of Analytics, (9) Digital Channels, (10) Reporting/Training.

Organization, namely the Company, has completed the formation of a special organization to handle anti-fraud, namely the Fraud Risk Management Department which is under the Digital and Operations Risk Division (DORD) since February 2024.

Implementation of Fraud Risk Management based on 4 (four) Pillars:

1. Prevention: Monitoring and evaluating SAF policies for prevention functions. Vulnerability identification includes activities: Fraud Risk Assessment (FRA), Risk Control Self Assessment (RCSA), RA/RT Planning, use of Fraud Risk Register.
2. Detection: Digital Fraud Monitoring & Detection: developing rules, models, customer risk profiles for FDS accuracy and also monitoring Flagged/ Triggered activities on FDS, Non-Digital Fraud: coordination, consolidation, evaluation of detection results from surprise audit programs, surveillance systems, verification, control testing and supervision.
3. Investigation, Reporting, and Sanctions: Monitoring includes prevention, investigation progress status, fraud detection results, investigation results, sanction determination, recovery to litigation. DORD has submitted a consolidated report every 3 months to the Anti-Fraud Sub-Committee and the Board of Commissioners. The contents of this consolidated report include fraud detection results, investigation status and aging, investigation results, follow-up settlement, sanction determination to litigation.
4. Monitoring, Evaluation and Follow-up, Monitoring of fraud event status, imposition of sanctions, completion of action plans, and recovery efforts, evaluation of fraud event reports, Preparation of preventive follow-up actions.

Committees Under the Board of Directors

The Company forms and determines the structure and membership of Committees under the Board of Directors in order to support the implementation of the Board of Directors' duties. These committees play a role in facilitating monitoring and creating effective problem solving and developing aspects deemed strategic by the Company in accordance with applicable regulations. These Committees include:

1. Risk Management Committee;
2. Asset and Liability Management Committee (ALCO);
3. Credit Policy Committee;
4. Credit Committee;
5. Human Capital Committee;
6. Information Technology Steering Committee;
7. Transformation Steering Committee;
8. Business Committee; and
9. Environmental, Social, and Governance (ESG) Committee.

Risk Management Committee

The Risk Management Committee (KOMAR) plays an active role in providing recommendations to the President Director regarding the risks inherent in policies that will be determined by the Board of Directors as well as providing evaluations of provisions that are deemed to be less appropriate with current developments and need to be adjusted. KOMAR is actively involved in assessing the risks inherent in each new product and/or service/activity so that the Bank can take the necessary mitigation steps and also evaluate the General Risk Management Policy (KUMR).

The Risk Management Committee is a committee that plays a role in providing recommendations to the President Director to formulate policies, strategies and risk management targets as well as facilities for monitoring and making decisions related to the implementation of the Company's risk management.

RISK MANAGEMENT COMMITTEE WORK GUIDELINES

The work guidelines for the Risk Management Committee refer to Special Policy Number KK.9-D concerning Directors' Governance Procedures. These guidelines regulate, among other things, Committee Responsibilities, Committee Duties and Functions, Committee Authorities, Duties of the Chair, Secretary and Committee Members and Procedures for Conducting Committee Meetings.

DUTIES AND RESPONSIBILITIES OF THE RISK MANAGEMENT COMMITTEE

The Risk Management Committee is responsible for decisions made at the Risk Management Committee Meeting, submitting reports on Significant Decisions made to the Board of Directors Meeting, as well as determining corrective steps regarding matters relating to the implementation of risk management in the Company.

The task of the Risk Management Committee is to evaluate and provide recommendations to the President Director regarding risk management which at least includes:

1. Preparation of Risk Management Policy and its changes, including risk management strategy and contingency plan in case of abnormal external conditions. The preparation is carried out together with the Division/Desk Head of the operational work unit and the Head of the Risk Management & ESG Work Unit and the Head of the Operational and Digital Risk Management Work Unit.
2. Improvements or improvements to the implementation of risk management carried out periodically or incidentally as a result of changes in the Bank's external and internal conditions which affect the Bank's capital adequacy and risk profile as well as the results of evaluations of the effectiveness of such implementation.
3. Making business decisions that deviate from normal procedures (Irregularities), such as decisions to exceed significant business expansion compared to the bank's previously determined business plan or taking risk positions/ exposures that exceed predetermined limits.
4. Monitoring and managing risks.
5. Decision on proposed Bank policies, standards, and procedures.
6. Integrated risk management strategy with capital adequacy.
7. Establish a risk management framework and methodology.

RISK MANAGEMENT COMMITTEE MEMBERSHIP STRUCTURE

The Risk Management Committee is regulated in Special Policy Number KK.9-D concerning Directors' Governance Procedures, with the following structure:

Structure	Position	Voting Rights	Permanent Member/ Non Member
Chairman	Director in charge of Risk Management	✓	(Chairman) Permanent member
Directors / SEVP	Director in charge of Asset Management*	✓	Permanent member
	Director in charge of Finance**	✓	Permanent member
	Director in charge of Consumer Credit/ Financing	✓	Permanent member
	Director in charge of SME Credit & Retail Funds	✓	Permanent member
	Director in charge of Institutional Funds and Network	✓	Permanent member
	Director in charge of Human Capital, Compliance, and Legal	×	Permanent Member
	Director in charge of Information Technology	✓	Permanent Member
	Director in charge of Operations and Customer Experience	✓	Permanent Member
	SEVP in charge of Operations	✓	Non-Permanent Member
	SEVP in charge of Digital Business	✓	Non-Permanent Member

Notes:
If the President Director/Deputy President Director attends the Risk Management Committee Meeting, the President Director/Deputy President Director acts as chairman and has voting rights.
*) Alternate Chairman I
**) Alternate Chairman II

PROFILE OF RISK MANAGEMENT COMMITTEE MEMBERS

The profiles of the members of the Risk Management Committee, both from the Board of Directors and SEVP of the Company, canbe seen in the Company Profile Chapter in the Profile of Directors and Profiles of Officials One Level Below Directors section in this Annual Report.

INDEPENDENCE OF THE RISK MANAGEMENT COMMITTEE

All members of the Risk Management Committee do not have any financial, management, share ownership and/ or family relationships with the Board of Commissioners, Board of Directors and/or Controlling Shareholders or relationships with the Company, which may affect their ability to act independently.

TRANSPARENCY OF THE RISK MANAGEMENT COMMITTEE

Disclosure of transparency of multiple positions of members of the Risk Management Committee from the Board of Directors can be seen in the Corporate Governance Chapter in the dual positions section of this Annual Report.

TERM AND PERIOD OF OFFICE OF THE RISK MANAGEMENT COMMITTEE

Disclosure of transparency of multiple positions of members of the Risk Management Committee from the Board of Directors can be seen in the Corporate Governance Chapter in the dual positions section of this Annual Report.

TERM AND PERIOD OF OFFICE OF THE RISK MANAGEMENT COMMITTEE

The term of office and term of office of the Risk Management Committee, whether from the Board of Directors or SEVP of the Company, follows the term of office of the Directors and Heads of Divisions of the Company who are members of the committee.

MEETINGS AND IMPLEMENTATION OF DUTIES OF THE RISK MANAGEMENT COMMITTEE IN 2024

The Risk Management Committee meeting policy is regulated in the Risk Management Committee Implementation Guidelines. Based on this Policy, Risk Management Committee meetings are held at least once every 3 (three) months. During 2024, the Risk Management Committee has held 17 (Seventeen) meetings. The implementation date and meeting agenda are as follows.

No.	Date	Agenda
1.	January 16, 2024	Discussion on Self-Assessment Results of Bankwide and Sharia Risk Profile Reports for Q4/2023 and Bank Soundness Level for Semester II/2023
2.	February 27, 2024	Discussion on Remodeling of PD PSAK 71 and Calculation of Market Risk ATMR in Accordance with OJK Circular Letter No. 23 of 2022
3.	March 19, 2024	Discussion on Consumer Credit Portfolio Quality Report
4.	April 2, 2024	Indication of Fraud on KRING KC Purwakarta Products and Business Process Improvement
5.	April 23, 2024	Discussion on Self-Assessment Results of Conventional and UUS Risk Profile Reports for Q1/2024
6.	May 6, 2024	Discussion on Internal and KBUMN Stress Test Results as of December 2023

No.	Date	Agenda
7.	June 3, 2024	Submission of OJK BUST Report as of December 31, 2023
8.	July 9, 2024	Discussion on Draft of Special Policy on Fraud Management Proce-dures and Other Regulations with Impacts
9.	July 16, 2024	Discussion on Self-Assessment Results of Conventional and UUS Risk Profiles for Q2/2024
10.	October 1, 2024	Discussion on the Results of the Risk Maturity Index for the Fiscal Year 2024
11.	October 8, 2024	Discussion on the Proposed Draft of the Special Policy on Personal Da-ta Protection (PDP)
12.	October 8, 2024	Discussion on the Risk Acceptance Criteria (RAC) for High-Risk Trans-actions at Branch Offices
13.	October 15, 2024	Discussion on the Results of the Self-Assessment of Conventional and UUS Risk Profiles for the Third Quarter of 2024
14.	November 8, 2024	Discussion on the General Policy (KU.8) for Risk Management
15.	November 18, 2024	Submission of the proposed Initiation of the 2025 Recovery Action Plan Document and the 2024 Periodic Resolution Plan.
16.	December 9, 2024	Discussion on the Initiation of Policies Impacted by OJK Regulation No. 15 of 2024
17.	December 23, 2024	Discussion of the proposed Internal Bank Regulations related to ICOFR

Assets and Liabilities Committee

The Asset and Liability Committee or hereinafter referred to as ALCO was formed by the Board of Directors with the aim of assisting the Board of Directors in formulating policies, compiling and establishing market risk management strategies as well as facilities for monitoring and making decisions regarding the implementation of the Company's Asset Liability Management (ALM) to maximize profitability and maintain the structure of the Company's balance sheet.

WORK GUIDELINES FOR THE ASSET AND LIABILITIES COMMITTEE

ALCO work guidelines refer to Special Policy No. KK.9-D concerning Governance Procedures for the Board of Directors Committee. This Special Policy regulates, among other things, matters that serve as guidelines for Bank officials in carrying out their duties and functions as a Board of Directors Committee and the implementation of Board of Directors Committee Meetings, one of which is the Assets and Liabilities Committee (ALCO), including::

1. Functions and Structure of the Asset and Liability Committee.
2. Responsibilities, Duties, and Functions of the Asset and Liability Committee.
3. Procedures for Holding Meetings of the Asset and Liability Committee.
4. Minutes of Meetings and Follow-up of the Asset and Liability Committee.
5. Supporting Group of the Asset and Liability Committee.

DUTIES AND RESPONSIBILITIES OF THE ASSET AND LIABILITIES COMMITTEE

Responsibility

1. The Assets and Liabilities Committee is responsible for evaluating, developing and establishing liquidity management strategies, so that the Bank can fulfill maturing obligations from cash flow funding sources and/or from high quality liquid assets that can be pledged as collateral, without disrupting the Bank's activities and financial condition.
2. The Assets and Liabilities Committee is responsible for determining and evaluating the Bank's asset and liability position in accordance with the objectives of managing liquidity risk, interest rate risk and exchange rate risk.
3. The Assets and Liabilities Committee is responsible for determining and evaluating the pricing of the Bank's assets and liabilities, to ensure that the prices can optimize the results of investment, minimize the cost of funds, and maintain the Bank's balance sheet structure in accordance with the Bank's ALMA strategy.
4. The Assets and Liabilities Committee is responsible for determining and evaluating the implementation and results related to the management of the Bank's assets and liabilities, which at least includes: liquidity management; gap management (maturity and repricing risks); foreign exchange management; income and investment management.
5. The Assets and Liabilities Committee is responsible for evaluating, developing and establishing ALIVA Bank management strategies every 6 (six) months.

Task

1. The duties and functions of the Assets and Liabilities Committee include the following:
   a. Manage liquidity management strategies, market risk management strategies, credit risk management strategies, and Bank asset and liability management strategies in order to meet the Bank's liquidity needs.
   b. Minimize idle funds.
   c. Maximizing Bank profitability and maintaining the Bank's balance sheet structure.
2. The duties and functions of the Asset and Liability Committee related to the Asset and Liability Committee Meeting or ALCO Meeting include the following:

a. Decide on all issues discussed in the Asset and Liability Committee Meeting agenda in accordance with their duties and responsibilities.
b. Request the relevant Work Unit to implement and follow up on the results of the Asset and Liability Committee Meeting.
c. Request the relevant Work Units to report on the implementation of the results of the decisions of the Asset and Liability Committee Meetings periodically, the implementation of which is carried out by the Management Unit in charge of Compliance.

3. The duties and functions of the Asset and Liability Committee can also decide that the Bank is in a liquidity crisis condition in accordance with the provisions of the Contingency Funding Plan (CFP).
   a. Declares that the Bank is in a liquidity crisis condition based on the Liquidity Crisis Management Committee (LCMC) Recommendations and states that the liquidity crisis has been successfully resolved.
   b. Activate the Contingency Funding Plan (CFP) when a liquidity crisis occurs and deactivate it again when the liquidity crisis has been resolved.
   c. activate the Contingency Funding Plan Command Center (CFPCC) when a liquidity crisis occurs and deactivate it again when the liquidity crisis has been resolved.

MEMBERSHIP STRUCTURE OF THE ASSET AND LIABILITIES COMMITTEE

Structure	Position	Voting Rights	Information
Chairman	President Director	✓	(Chairman) Permanent member
Directors / SEVP	Vice Director *)	✓	Permanent membe
	Director in charge of Finance	✓	Permanent membe
	Director in charge of Asset Management	✓	Permanent membe
	Director in charge of Risk Management	✓	Permanent membe
	Director in charge of Consumer Credit / Fi-nancing	✓	Permanent membe
	Director in charge of Institutional Funds and Networks	✓	Permanent membe
	Director in charge of SME Credit & Retail Funds	✓	Permanent membe
	Director in charge of Information Technology	✓	Permanent membe
	Director in charge of Human Capital, Compli-ance, and Legal	×	Permanent membe
	Director in charge of Operations and Cus-tomer Experience	✓	Permanent membe
	SEVP in charge of Wholesale Banking	✓	Permanent membe
	SEVP in charge of Digital Business	✓	Permanent membe
	SEVP in charge of Operations	✓	Non-Permanent Member

*Alternate Chairman 1

PROFILE OF ASSETS AND LIABILITIES COMMITTEE MEMBERS

The profiles of ALCO members from the Company's Board of Directors and SEVP can be seen in the Company Profile Chapter in the Directors' Profiles and Officers' Profiles one level below the Directors in this Annual Report.

INDEPENDENCE OF THE ASSET AND LIABILITIES COMMITTEE

All ALCO members have no financial, management, share ownership and/or family relationships with the Board of Commissioners, Directors and/or Controlling Shareholders or relationships with the Company, which could affect their ability to act independently.

TRANSPARENCY OF THE MULTIPLE POSITIONS OF THE ASSET AND LIABILITIES COMMITTEE

Disclosure of transparency of multiple positions of ALCO members from the Board of Directors can be seen in the Corporate Governance Chapter in the dual positions section of this Annual Report.

TERM AND PERIOD OF OFFICE OF THE ASSET AND LIABILITIES COMMITTEE

The term of office and term of office of ALCO, whether from the Board of Directors or SEVP of the Company, follows the term of office of the Directors and Heads of Divisions of the Company who are members of the committee.

TRAINING AND COMPETENCY DEVELOPMENT

Training for ALCO members from the Board of Directors can be seen in the Training and/or Competency Improvement Subchapter for Directors Members in the Corporate Governance Chapter of this Annual Report.

MEETINGS AND IMPLEMENTATION OF THE DUTIES OF THE ASSET AND LIABILITY COMMITTEE IN 2024

ALCO meeting policy is regulated in KK.9-D of the Board of Directors Committee Governance Procedure. Based on this Policy, ALCO Committee meetings are held at least 1 (one) time in 3 (three) months, but if deemed necessary, the Committee Chair may hold a meeting at any time. During 2024, ALCO held 15 meetings. The dates and agendas of the meetings are as follows:

No.	Date	Agenda
1.	January 15, 2024	Evaluation of Rupiah and USD TPF Counter Rates
		Evaluation of BTN Investa Plus Savings Special Rates
		Evaluation of Rupiah and USD Deposit Special Rates
		Evaluation of Non-Subsidized Mortgage/KPR/KPA Loan/Financing Interest Rates
		Evaluation of KAR Loan/Financing Interest Rates
		Determination of Trade Finance Interest Rates
2.	February 20, 2024	Evaluation of Special Deposit Rates (Retail and Institutional)
		Granting of Special Interest Rate Authority
		Extension of KPR Maju Interest Rates
		Extension of KMK/KMK Interest Rates for Passive Asset Purchase Renovation and Active Asset NPL
3.	March 7, 2024	Evaluation of BTN Investa and Investa Plus Savings Special Rates
		Evaluation of Special Deposit Rates (Retail and Institutional)
4.	March 14, 2024	Cashflow Projection for March 2024
		Authority Determination of Special Interest Rate Policy
5.	April 23, 2024	Cashflow Projection for April 2024
		Provision of Special Rates for Time Deposits and Current Account (Retail and Institutional)
		Evaluation of Investa Plus Savings Special Rates
		Evaluation of KAR Project Eagle Interest Rates
		Determination of Penalty Relief Policy
		Evaluation of KAR Counter for Existing Debtors
6.	May 14, 2024	Cash Flow Projection for May 2024
		Liquidity Ratio Monitoring in accordance with May 2024 Cash Flow Projection
7.	June 11, 2024	Cash Flow Projection for June 2024
		Application for Special Deposit Interest Rates, Investa Savings, and Current Account
		Application for Extension of Kring BTN Solusi Plus and Kring BTN Super Solusi Interest Rates
8.	July 09, 2024	Cash Flow Projection for July 2024
		Application for Special Deposit Interest Rates, Investa Savings, and Current Account
		Application for Non-Subsidized KPR/KPA Interest Rate Policy
9.	July 16, 2024	Cash Flow Projection for July 2024
		Application for Euro Denominated Foreign Currency Giro
		Request for Kring Ultimate Interest Rate
10.	August 13, 2024	Cash Flow Projection for August 2024
		Request for Special Interest Rate for Deposits, Investa Savings, and Current Account
		Request for Adjustment of KPR Maju Interest Rate
		Request for Adjustment of KMK Interest Rate for Renovation of Passive Asset Purchase and Active Asset NPL
11.	September 10, 2024	Cash Flow Projection for September 2024
		Request for Kring Efektif Interest Rate for BTN
12.	September 20, 2024	Cash Flow Projection for September 2024
		Request for Special Interest Rate for Deposits, Individual Investa, Institutional Investa, and Current Account
13.	October 08, 2024	Cash Flow Projection for October 2024
		Application for Extension of KAR Ultimate Interest Rate
		Application for Non-Subsidized Mortgage/KPA Interest Rate Policy
14.	November 12, 2024	Cash Flow Projection for November 2024
		Proposed BTN iB E-Deposit Counter Ratio
15.	December 09, 2024	Cash Flow Projection for December 2024
		Application for Extension of KPR Ruko Interest Rate
		Application for Non-Subsidized KPR/KPA Quota Policy

Credit or Financing Policy Committee

The Credit or Financing Policy Committee is a committee that plays a role in formulating policies, supervising policy implementation, monitoring the development and condition of the credit portfolio and providing direction for improvement steps in the credit sector.

WORK GUIDELINES FOR THE CREDIT OR FINANCING POLICY COMMITTEE

The work guidelines for the Credit or financing Policy Committee refer to Special Policy No. KK.9-D concerning the Governance Procedures of the Board of Directors Committee, with the following contents:

1. Function and Structure
2. Responsibilities, Duties, Functions, and Authorities
3. Provisions for Meetings and Minutes of the Board of Directors Committee Meetings

DUTIES AND RESPONSIBILITIES OF THE CREDIT OR FINANCING POLICY COMMITTEE

The responsibilities of the Credit or financing Policy Committee are as follows:

1. The Credit or Financing Policy Committee is responsible for the decisions made during the Committee's meetings.
2. The Credit or Financing Policy Committee is responsible for submitting reports on significant decisions made to the Board of Directors' meeting and providing a copy to the Board of Commissioners at least once a year.

The duties and functions of the Credit and Financing Policy Committee are as follows :

1. Providing input to the Board of Directors in preparing the Bank's Credit Policy, particularly related to the formulation of prudential principles in credit or financing.
2. Supervising the consistent and proper implementation of the Bank's Credit Policy and formulating solutions to overcome obstacles or challenges in its application. Additionally, the Credit or Financing Policy Committee conducts periodic reviews of the Credit Policy and provides recommendations to the Board of Directors if changes or improvements are necessary.
3. Monitor and evaluate:
   a. Development and quality of the overall credit or financing portfolio.
   b. Correct implementation of authority to decide on credit or financing.
   c. Correctness of the process of granting, development and quality of credit or financing provided to parties related to the Company and certain large debtors.
   d. Correct implementation of LLL provisions.
   e. Compliance with statutory provisions and other regulations in the implementation of providing credit or financing.
   f. Settlement of problem loans in accordance with those stipulated in the KPB.
   g. The Company's efforts to meet the adequacy of the amount of credit or financing write-offs.
4. Making decisions on proposed regulations related to credit.

MEMBERSHIP STRUCTURE OF THE CREDIT OR FINANCING POLICY COMMITTEE

The structure and membership of the Credit or Financing Policy Committee refer to the Special Policy No. KK.9-D on the Governance Procedures of the Board of Directors Committee, with the structure and membership as follows:

Structure	POSITION	Voting Rights	Information
Chairman	President Director	✓	Permanent member
Directors/ SEVP	Vice President Director *)	✓	Permanent member
	Director in charge of Risk Management**)	✓	Permanent member
	Director in charge of Assets Management	✓	Permanent member
	Director in charge of Consumer Credit and Financing	✓	Permanent member
	Director in charge of SME Credit & Retail Funding	✓	Permanent member
	Director in charge of Institutional Funding and Net-work	✓	Permanent member
	Director in charge of Operations and Customer Experience	✓	Permanent member
	Director in charge of Finance	✓	Permanent member
	Director in charge of Human Capital, Compliance, and Legal	×	Permanent member
	SEVP in charge of Wholesale Banking	✓	Permanent member

Structure	POSITION	Voting Rights	Information
Direksi/SEVP	SEVP in charge of Operations	✓	Permanent member
	Direktur in charge of Information Technology	✓	Non-Permanent Member
	SEVP in charge of Digital Business	✓	Non-Permanent Member

*) Substitute Chairman I
**) Substitute Chairman II

PROFILE OF MEMBERS OF THE CREDIT OR FINANCING POLICY COMMITTEE

The profiles of members of the Credit or Financing Policy Committee, both from the Board of Directors and SEVP of the Company, can be seen in the Company Profile Chapter in the Profile of Directors and Profiles of Officials One Level Below Directors section in this Annual Report.

INDEPENDENCE OF THE COMMITTEE COMMITTEE ON CREDIT OR FINANCING POLICY

All members of the Credit or Financing Policy Committee do not have financial, management, share ownership and/ or family relationships with the Board of Commissioners, Directors and/ or Controlling Shareholders or relationships with the Company, which could affect their ability to act independently.

TRANSPARENCY OF THE CONCURRENT POSITIONS OF THE CREDIT OR FINANCING POLICY COMMITTEE

Disclosure of the transparency of concurrent positions of members of the Credit or Financing Policy Committee from the Board of Directors can be seen in the Corporate Governance Chapter in the concurrent positions section of this Annual Report.

TERM OF OFFICE AND PERIOD OF OFFICE OF THE CREDIT OR FINANCING POLICY COMMITTEE AAN

The term of office and term of office of the Credit or Financing Policy Committee, whether from the Board of Directors or SEVP of the Company, follows the term of office of the Directors and Heads of Divisions of the Company who are members of the committee.

TRAINING AND COMPETENCE DEVELOPMENT OR FINANCING

Training for members of the Credit or Financing Policy Committee from the Board of Directors can be seen in the Training and/or Competency Improvement Sub-Chapter for Directors Members in the Corporate Governance Chapter of this Annual Report.

MEETINGS AND IMPLEMENTATION OF DUTIES OF THE CREDIT OR FINANCING POLICY COMMITTEE IN 2024

The Credit or Financing Policy Committee holds meetings at least once every three months. During 2024, the Credit Policy Committee held a total of 10 (ten) meetings. The dates of the meetings and the meeting agendas are as follows.

No.	Date	Agenda
1.	March 14, 2024	Proposal for Revision of Special Policy No.KK.1-VI regarding Guarantee Products and Services
2.	March 25, 2024	Proposal for Revision of Special Policy KK.9-D regarding the Governance Procedure of the Board of Directors Committee
3.	June 3, 2024	Proposal for Changes in the A1 Credit Committee Quorum and the Credit Decision-Making Authority Limit
4.	June 10, 2024	Proposal for approval of New Provisions in Special Policy KK.1-R related to Restructuring for Debtors who have Previously Been Restructured due to Covid-19
5.	September 30, 2024	Proposal for Additional Provisions on Removal of Restructuring Tag for Consumer and Commercial Debtors
6.	September 30, 2024	Proposal for Additional Provisions on Removal of Restructuring Tag for Consumer and Commercial Debtors
7.	October 7, 2024	Proposal for the Update of Special Policy on Non-Performing Asset Sales with the Purchase of Sukuk Securities
8.	October 15, 2024	Proposal for Approval of Adjustments Regarding BMPK Provisions
9.	December 9, 2024	Proposal for the Update of Special Policy No. KU.1 regarding Bank Credit or Financing
10.	December 16, 2024	Proposal for Special Policy on theWrite-Off of Bad Debts to Micro, Small, and Medium Enterprises

Credit Committee

The Credit Committee is a committee that plays a role in providing decisions on granting credit (new credit or credit restructuring) in accordance with the highest authority based on the Credit Decision Authority Limit (BMPK).

CREDIT COMMITTEE WORK GUIDELINES

The work of the Credit Committee refers to Special Policy (KK).9-D, with the following contents :

- Function and Structure
- Responsibilities, Tasks, Functions, Authorities
- Meeting Provisions and Minutes of the Board of Directors's Committee Meetings
- Membership of the Credit Committee Meetings

DUTIES AND RESPONSIBILITIES OF THE CREDIT COMMITTEE

TThe duties and responsibilities of the Credit Committee are as follows:

1. To make decisions on the approval or rejection of credit or financing applications according to specific authorities established by the Board of Directors.
2. To be responsible for carrying out tasks related to the granting, modification of facilities, and/or restructuring of credit or financing under its authority limits.
3. To reject requests and/or influence from parties with an interest in the credit or financing applicant for the approval of credit or financing that is purely formal.
4. To coordinate with the Asset & Liabilities Committee (ALCO) on aspects of credit/ financing funding as well as credit/financing rates.

CREDIT COMMITTEE MEMBERSHIP STRUCTURE

1. Jenis dan tingkat Komite Kredit berdasarkan kewenangannya terbagi dengan kategori sebagai berikut:

No.	Committee Type	Committee Level	Work Unit
1.	Commitee A	A1	Board of Directors
		A2	
		A3	
		A4	
2.	Commitee B	B	Headquarters
3.	Commitee C	C1	Regional Office
		C2	Commercial Banking Center (CBC)
4.	Commitee D	D1	Branch Office/Sharia Branch Office
		D2	
		D3	

2. The Credit Committee at the Board of Directors level is divided into 4 (four) levels with a minimum quorum of Permanent Members present as follows:

Committee	Business	Risk Function	Independent Function
Committee A1	All Members	All Members	1 people
Committee A2	3 people	3 people	1 people
Committee A3	2 people	2 people	1 people
Committee A4	1 people	1 people	1 people

3. Permanent Membership in the Credit Committee at the Board of Directors level is divided into 3 (three) functions and the voting rights attached to each function are as follows:

Risk Function		Business Functions	
Position	Voting Rights	Position	Voting Rights
President Director	✓	vice director	✓
Director incharge of Risk Management	✓	Director in charge of Credit/ Financing	✓
Director in charge of Asset Management	✓	Director in charge of Finance	✓
Director in charge of Information Systems	✓	Director in charge of Network	✓
SEVP in charge of Credit Operations	✓	*Director in charge of Institutional Banking*	✓
		SEVP in charge of Wholesale Banking	✓

Independent Function	Voting Rights
Director in charge of Compliance and Legal	×
SEVP in charge of Compliance and Legal	×

Non-Permanent Membership in the Credit Committee at the Board of Directors level is regulated by the following provisions

No.	Non-permanent Member	Voting Rights
1.	Head/Deputy Head of Commercial Credit Work Unit or Official Holding RKK Authority	×
2.	Head of the Corporate Credit Work Unit or Official Holding RKK Authority	×
3.	Head of SME Credit Work Unit or Official Holding RKK Authority	×

No.	Non-permanent Member	Voting Rights
4.	Head of Commercial Financing Work Unit or Official Holding RKK Authority	×
5.	Head of Asset Management Work Unit or Official Holding RKK Authority	×
6.	Head of Financial Institution Work Unit or Official Holding RKK Authority	×
7.	Head/Deputy Head of the Commercial Credit Risk Work Unit or Official Hold-ing RKK Authority	×
8.	Head of Commercial Credit Work Unit at the Commercial Banking Center	×
9.	Head of the Commercial Credit Risk Work Unit at the Commercial Banking Center	×
10.	Head of Legal Work Unit or Official Holding RKK Authority	×
11.	Head of the Compliance Work Unit or Official Holding RKK Authority	×
12.	Head of the Internal Audit Work Unit or Official Holding RKK Authority	×

4. Membership in the Credit Committee other than at the Board of Directors level is regulated by provisions according to each level as follows:
   A. Credit Committee B
      • Permanent member

Risk Function		Business Functions	
Position	Voting Rights	Position	Voting Rights
Head/Deputy Head of the Commer-cial Credit Risk Working Unit or Offi-cal Holder of the Commercial Credit Risk Authority (RKK)	✓	Head/Deputy Head of the Com-mercial Credit Working Unit or Offi-cial Holder of the Commercial Credit Risk Authority (RKK)	✓
		Head of the Corporate Credit Work-ing Unit or Official Holder of the Commercial Credit Risk Authority (RKK)	✓
		Head of the SME Credit Working Unit or Official Holder of the Com-mercial Credit Risk Authority (RKK)	✓
		Head of the Commercial Financing Working Unit or Official Holder of the Commercial Credit Risk Authori-ty (RKK)	✓
		Head of the Asset Management Working Unit or Official Holder of the Commercial Credit Risk Authori-ty (RKK)	✓
		Head of the Financial Institution Working Unit or Official Holder of the Commercial Credit Risk Authori-ty (RKK)	✓

      • Non-Permanent Members

No.	Non-permanent Member	Voting Rights
1.	Head of the Commercial Credit Work Unit Department	×
2.	Head of the Corporate Credit Work Unit Department	×
3.	Head of the SME Credit Work Unit Department	×
4.	Head of the Commercial Financing Work Unit Department	×
5.	Head of the Financial Institution Work Unit Department	×
6.	Head of the Asset Management Work Unit Department	×
7.	Head of Commercial Credit Work Unit at the Commercial Banking Center	×
8.	Head of Commercial Credit Risk Work Unit Department	×
9.	Head of the Commercial Credit Risk Work Unit at the Commercial Banking Center	×
10.	Head of Legal Work Unit Department or Official Holding Authority	×
11.	Head of Compliance Work Unit Department or Official Holding Authority	×

   B. Credit Committee C1
      • Permanent member

Risk Function		Business Functions	
Position	Voting Rights	Position	Voting Rights
Head of Commercial Credit Risk Work Unit at the Regional Office	✓	Head of Regional Office	✓
		Head of the Asset Management Work Unit at the Regional Office	✓

      • Non-Permanent Members

No.	Non-permanent Member	Voting Rights
1.	Deputy Head of Regional Office	×
2.	Head of the SME Credit Work Unit at the Regional Office	×
3.	Head of Commercial Credit Work Unit at the Commercial Banking Center	×
4.	Head of the Commercial Credit Risk Work Unit at the Commercial Banking Center	×
5.	Commercial Credit Risk Analyst at Regional Office **)	×
6.	Legal Checklist *)	×
7.	Compliance Checklist *)	×

C. Credit Committee C2

- Permanent member

Risk Function		Business Functions	
Position	Voting Rights	Position	Voting Rights
Head of Commercial Credit Work Unit at the Commercial Banking Center	✓	Head of the Commercial redit Risk Work Unit at the Commercial Banking Center	✓

- Non-Permanent Members

No.	Non-permanent Member	Voting Rights
1.	Commercial Credit Work Unit Manager at the Commercial Banking Center	×
2.	Commercial Credit Risk Work Unit Manager at the Commercial Banking Center	×
3.	Legal Checklist *)	×
4.	Compliance Checklist *)	×

D. Credit Committee D

- Permanent member

Risk Function		Business Functions	
Position	Voting Rights	Position	Voting Rights
Head of SME Credit/ Financing Risk Work Unit at Branch Offices/Sharia Branch Offices	✓	Branch Head or Head of Sharia Branch	✓

- Non-Permanent Members

No.	Non-permanent Member	Voting Rights
1.	Head of SME Credit Work Unit at Branch OfficeSME at Branch Office	×
2.	Head of Commercial Financing Work Unit at the Sharia Branch Office	×
3.	SME Credit/Financing Risk Analyst at Branch Offices/Sharia Branch Offices	×
4.	Legal Checklist *)	×
5.	Compliance Checklist *)	×

PROFILE OF CREDIT COMMITTEE MEMBERS

The profiles of Credit Committee members from both the Board of Directors and SEVP of the Company can be seen in the Company Profile Chapter in the Profile of Directors and Profiles of Officials One Level Below Directors section in this Annual Report.

INDEPENDENCE OF THE CREDIT COMMITTEE

All members of the Credit Committee have no financial, management, share ownership and/or family relationships with the Board of Commissioners, Directors and/or Controlling Shareholders or relationships with the Company, which could affect their ability to act independently.

TRANSPARENCY OF MULTIPLE POSITIONS OF THE CREDIT COMMITTEE

Disclosure of the transparency of multiple positions of members of the Credit Committee from the Board of Directors can be seen in the Corporate Governance Chapter in the dual positions section of this Annual Report.

TERM OF OFFICE AND PERIOD OF OFFICE OF THE CREDIT COMMITTEE

The term of office and term of office of the Credit Committee, whether from the Board of Directors or SEVP of the Company, follows the term of office of the Directors and Heads of Divisions of the Company who are members of the committee.

TRAINING AND COMPETENCY DEVELOPMENT

Training for Credit Committee members from the Board of Directors can be seen in the Training and/or Competency Improvement Sub-chapter for Directors Members in the Corporate Governance Chapter of this Annual Report.

MEETINGS AND IMPLEMENTATION OF CREDIT COMMITTEE TASKS IN 2024

Meeting Policy

1. The composition of the Credit/Financing Committee consists of business functions and risk functions. This division of two (2) functions aims to establish a system of checks and balances between the business unit as the initiator and the credit risk unit as the risk mitigation unit.
2. Decision-making by the Credit/Financing Committee is conducted through joint meetings called the Credit Committee Meeting (RKK).
3. Credit/Financing Committee meetings must reach decisions through deliberation and consensus. If consensus cannot be achieved, decisions must be made by voting, requiring more than half ½ of the members with voting rights to agree. There is no escalation of credit or financing decisions to a higher authority if consensus is not reached.
4. Before the Credit/Financing Committee Meeting (RKK), a pre-meeting (Pre-RKK) is conducted to coordinate and discuss credit applications, facility changes, or credit/financing restructuring by the relevant work units.
5. Every decision made by the Credit/Financing Committee must be recorded, documented, and signed by both Permanent Members and Non-Permanent Members of the Credit Committee. The

Credit Committee Meeting is conducted for decision-making regarding commercial credit, including new applications, changes to credit structuring, and credit restructuring.

Meeting Implementation

The organization of the Credit Committee meetings is proposed by the Proposing Division, which includes the Commercial Credit Business Division and the Commercial Credit Risk Division. Throughout 2024, the Credit Committee conducted a total of 3,045 meetings at various levels, with the details as follows.

No.	Credit Committee Level	Number of Meetings
1.	Credit Committee A	144
2.	Credit Committee B	146
3.	Credit Committee C1	187
4.	Credit Committee C2	742
5.	Credit Committee D	1.862

Human Capital Committee

The Human Capital Committee is a committee that plays a role in improving the quality of Human Capital policies by adhering to the principles of good governance and enhancing the quality of human capital management to support the Bank's business strategy.

HUMAN CAPITAL COMMITTEE WORK GUIDELINES

The work guidelines of the Human Capital Committee refer to the Special Policy KK.9 – D on the Procedures for the Governance of the Board of Directors' Committee, with the following content:

1. Function and Structure
2. Responsibilities, Duties, Functions, and Authority
3. Meeting Regulations and Minutes of the Board of Directors Committee Meetings

DUTIES AND RESPONSIBILITIES OF THE HUMAN CAPITAL COMMITTEE

The duties and responsibilities of the Human Capital Committee are to assist the President Director with matters relating to, among other things and at least include:

1. Recommend strategies, policies and human capital management systems that are in line with the Bank's Business Plan.
2. Has the authority to make decisions regarding the implementation of management in the personnel sector.
3. Responsible for recommending policy proposals which will then be decided through the mechanism of the
4. Board of Directors Meeting. Decide on proposed Bank policies, standards and procedures related to human capital.
5. Has the authority to make decisions other than points 1 – 4 above if given a mandate by the Board of Directors Meeting.
6. If necessary, coordinate with the Remuneration and Nomination Committee in reviewing the Human Capital Management system/policy.
7. The Human Capital Committee at the Headquarters is responsible for reporting significant decisions to the Board of Directors' Meeting at least once a year

MEMBERSHIP STRUCTURE OF THE HUMAN CAPITAL COMMITTEE

The structure and membership of the Human Capital Committee have been established based on the Special Policy KK.9 – on the Governance Procedures of the Board of Directors Committee with the structure and membership as follows:

Structure	Position	Voting Rights	Information
Chairman	President Director	✓	Permanent member
Directors/SEVP	Vice President Director *)	✓	Permanent member
	Director in charge of Human Capital, Compliance, and Legal	✓	Permanent member
	Director in charge of Institutional Funding and Network	✓	Permanent member
	Director in charge of Risk Management	✓	Permanent member
	Director in charge of Consumer Credit and Financ-ing	✓	Permanent member
	Director in charge of SME Credit & Retail Funding	✓	Permanent member
	Director in charge of Finance	✓	Permanent member
	Director in charge of Operations and Customer Experience	✓	Permanent member
	Director in charge of Assets Management	✓	Non-Permanent Member
	Director in charge of Information Technology	✓	Non-Permanent Member
Directors/SEVP	SEVP in charge of Wholesale Banking	✓	Non-Permanent Member
	SEVP in charge of Digital Business	✓	Non-Permanent Member
	SEVP in charge of Operations	✓	Non-Permanent Member

Note:

*) Substitute Chairperson I

PROFILE OF MEMBERS OF THE HUMAN CAPITAL COMMITTEE

The profiles of members of the Human Capital Committee, both those from the Board of Directors and SEVP of the Company, can be seen in the Company Profile Chapter in the Profile of Directors and Profiles of Officials One Level Below Directors section in this Annual Report.

INDEPENDENCE OF THE HUMAN CAPITAL COMMITTEE

All members of the Human Capital Committee have no financial, management, share ownership and/or family relationships with the Board of Commissioners, Directors and/or Controlling Shareholders or relationships with the Company, which could affect their ability to act independently.

TRANSPARENCY OF THE MULTIPLE POSITIONS OF THE HUMAN CAPITAL COMMITTEE

Disclosure of transparency of concurrent positions of members of the Human Capital Committee from the Board of Directors can be seen in the Corporate Governance Chapter in the dual positions section of this Annual Report.

TERM OF OFFICE AND PERIOD OF OFFICE OF THE HUMAN CAPITAL COMMITTEE

The term of office and term of office of the Human Capital Committee, whether from the Board of Directors or SEVP of the Company, follows the term of office of the Directors and Heads of Divisions of the Company who are members of the committee.

TRAINING AND COMPETENCY DEVELOPMENT

Training for Human Capital Committee members from the Board of Directors can be seen in the Training and/or Competency Improvement Sub-chapter for Directors Members in the Corporate Governance Chapter of this Annual Report.

MEETINGS AND IMPLEMENTATION OF DUTIES OF THE HUMAN CAPITAL COMMITTEE IN 2023

The policy of Human Capital Committee meetings is to be held at least once every 3 (three) months. During 2024, the Human Capital Committee has held 16 (sixteen) meetings. The implementation date and meeting agenda are as follows..

No.	Date	Agenda
1.	January 08, 2024	Talent Mobility for L1A and L1B Officials
2.	January 08, 2024	Talent Mobility Branch Manager Officials
3.	January 17, 2024	Talent Mobility Branch Manager Officials
4.	February 19, 2024	Talent Mobility L1A and L1B Officials
5.	March 13, 2024	Talent Mobility L1A and L1B Officials
6.	April 04, 2024	Talent Mobility Branch Manager Officials
7.	April 30, 2024	Talent Mobility L1A and L1B Officials
8.	May 27, 2024	Talent Mobility Branch Manager Officials
9.	June 24, 2024	Talent Mobility L1A and L1B Officials
10.	June 30, 2024	Talent Mobility L1A and L1B Officials
11.	August 26, 2024	Talent Mobility L1A and L1B Officials
12.	September 17, 2024	Talent Mobility Branch Manager Officials
13.	October 14, 2024	Talent Mobility L1A and L1B Officials
14.	November 08, 2024	Talent Mobility Branch Manager Officials
15.	November 18, 2024	Talent Mobility L1A and L1B Officials
16.	December 05, 2024	Determination of Nominated Talent

Information Technology Steering Committee

In accordance with OJK Regulation Number 11/POJK.03/2022 concerning the Implementation of Information Technology by Commercial Banks, Companies are required to have an Information Technology Steering Committee. To support this, there needs to be provisions governing the Information Technology Steering Committee. In this regard, the Board of Directors considers it necessary to regulate provisions regarding the Information Technology Steering Committee in the form of Special Policy Number KK.9-D concerning Governance Procedures for the Board of Directors Committee.

INFORMATION TECHNOLOGY STEERING COMMITTEE WORK GUIDELINES

The working guidelines for the Information Technology Steering Committee refer to the Company's internal provisions, specifically the Special Policy Number KK.9-D regarding the Governance Procedure of the Board of Directors Committee.

DUTIES AND RESPONSIBILITIES OF THE INFORMATION TECHNOLOGY STEERING COMMITTEE

Tanggung jawab Komite Pengarah Teknologi Informasi

The responsibilities of the Information Technology Steering Committee are as follows:

1. The Information Technology Steering Committee is responsible for the recommendations agreed upon in the Information Technology Steering Committee meetings.
2. The Information Technology Steering Committee is responsible for reporting significant decisions made to the Board of Directors meetings.
3. The committee is responsible for establishing corrective measures concerning issues related to the implementation of risk management in BTN.

The tasks and functions of the Information Technology Steering Committee include providing recommendations to the Board of Directors on the following:

1. Ensuring that the Information Technology Strategic Plan aligns with the Company's business strategy, as outlined in the Long-Term Plan (RJP), When making recommendations, the Committee must consider efficiency, effectiveness, and the following factors.
   a. A roadmap to achieve the Information Technology needs that support the Company's business strategy. The roadmap consists of the current state, the desired future state, and the steps to be taken to achieve the desired future state;
   b. The resources needed;
   c. The benefits to be obtained when the RSTI is implemented, and
   d. Potential obstacles that may arise during the implementation of the RSTI.
2. Deciding on proposals regarding policies, standards, and procedures related to Information Technology within the Bank.
3. Ensuring the implementation of the Information Technology Strategic Plan (RSTI) as outlined in the Company's Work and Budget Plan (RKAP).
4. Evaluating, directing, and monitoring the implementation of Information Technology operations.
5. Monitoring the prioritization of IT APEX and IT OPEX for the development of Information Technology based on the RSTI.
6. Having the authority to make decisions on prioritization and reallocation of IT CAPEX, IT OPEX, and IT Plans by considering the following aspects:
   a. Alignment between the Information Technology development plan and the RSTI; and
   b. Alignment between the implementation of Information Technology development and the agreed-upon Information Technology Development Plan portfolio list.
7. Evaluating the cost-effectiveness of IT investments concerning the planned benefits.
8. Monitoring Information Technology performance and efforts to improve its performance.
9. Addressing issues related to Information Technology that cannot be resolved effectively, efficiently, and on time by the Users and Information Technology Providers.
10. The sufficiency and allocation of resources within the Bank.
11. The effectiveness of measures to minimize risks regarding the bank's investment in Information Technology to ensure that these investments contribute to achieving the Bank's business goals.
12. Strategies and corrective actions concerning the implementation or risk management related to Information Technology, Digital, and Cyber aspects in the Bank.

MEMBERSHIP STRUCTURE OF THE INFORMATION TECHNOLOGY STEERING COMMITTEE

The structure and membership of the Information Technology Steering Committee are based on Special Policy No.KK.9-D, regarding the Governance Procedures of the Board of Directors, with the structure and membership as follows:

Structure	Position	Voting	Description
Chairman	President Director	✓	Permanent member
Directors/ SEVP	Vice President Director *)	✓	Permanent member
	Director in charge of Information Technology	✓	Permanent member
	Director in charge of Risk Management	✓	Permanent member
	Director in charge of Finance	✓	Permanent member
	Director in charge of Human Capital, Compliance, and Legal	✓	Permanent member
	Director in charge of Operations and Customer Experience	✓	Permanent member
	SEVP in charge of Digital Business	✓	Permanent member
	SEVP in charge of Operations	✓	Permanent member
	Director in charge of Institutional Funding and Network	✓	Non-Permanent Member
	Director in charge of Assets Management	✓	Non-Permanent Member
	Director in charge of SME Credit & Retail Funding	✓	Non-Permanent Member

Structure	Position	Voting	Description
	Director in charge of Consumer Credit and Financ-ing	✓	Non-Permanent Member
	SEVP in charge of Wholesale Banking	✓	Non-Permanent Member

Note:

*) Substitute Chairperson I

PROFILE OF TECHNOLOGY STEERING COMMITTEE MEMBERSINFORMATION

The profiles of members of the Information Technology Steering Committee, both from the Board of Directors and SEVP of the Company, can be seen in the Company Profile Chapter in the Profile of Directors and Profiles of Officials One Level Below Directors section in this Annual Report.

INDEPENDENCE OF THE TECHNOLOGY STEERING COMMITTEEINFORMATION

All members of the Information Technology Steering Committee have no financial, management, share ownership and/or family relationships with the Board of Commissioners, Directors and/ or Controlling Shareholders or relationships with the Company, which could affect their ability to act independently.

TRANSPARENCY OF THE INFORMATION TECHNOLOGY STEERING COMMITTEE

Disclosure of transparency of concurrent positions of members of the Information Technology Steering Committee from the Board of Directors can be seen in the Corporate Governance Chapter in the concurrent positions section of this Annual Report.

TERM AND PERIOD OF OFFICE OF THE INFORMATION TECHNOLOGY STEERING COMMITTEE

The term of office and term of office of the Information Technology Steering Committee, whether from the Board of Directors or SEVP of the Company, follows the term of office of the Directors and Heads of Divisions of the Company who are members of the committee. .

TRAINING AND COMPETENCY DEVELOPMENT

Training for Information Technology Steering Committee members from the Board of Directors can be seen in the Training and/or Competency Improvement Sub-chapter for Directors Members in the Corporate Governance Chapter of this Annual Report.

MEETING AND IMPLEMENTATION OF DUTIES OF THE INFOMATION TECHNOLOGY STEERING COMMITTEE IN 2024

Information Technology is carried out at least 4 (four) times during the current year. If deemed necessary, a meeting of the Information Technology Steering Committee can be held at any time upon written request from the permanent members of the Information Technology Steering Committee. During 2024, the Information Technology Steering Committee has held 4 (four) meetings. The implementation date and meeting agenda are as follows..

No.	Date	Agenda
1.	06 February 2024	- Review of RSTI 2021-2025 & Main Initiatives.. - IT Maturity & Organization Review. - IT Security. - Asesmen Enterprise Finance System. - Asesmen Data Center. - Digital Risk Update.
2.	28 May 2024	- Review RSTI 2021-2025 & Inisiatif Utama. - Hasil Pengukuran Digital Maturity Assessment for Bank (DMAB). - IT Guiding Principle dan Aset Hak Guna. - Digital Risk Monitoring.
3.	29 September 2024	- Review RSTI 2021-2025 & Inisiatif Utama. - IT Compliance & Security Index. - Benefit Realization. - Digital Risk Monitoring.
4.	28 November 2024	- Rencana Strategi Teknologi Informasi (RSTI). - Usulan Inisiatif Utama 2025. - Review Kebijakan Umum TI, Manajemen Data, dan Digital. - Update Inisiatif 2024. - Digital Risk Monitoring.

Transformation Steering Committee

The function of the Transformation Steering Committee is to assist the Board of Directors in determining priorities and deciding on the implementation of Transformation initiatives in accordance with the Company's business strategy in the fields of Human Capital, Organization & Governance, Risk Management and Compliance (GRC); information Technology, Digital and Network; Commercial Banking & Business Process, Consumer Banking & Sharia; Partnership & Project Management.

TRANSFORMATION STEERING COMMITTEE WORK GUIDELINES

The working guidelines of the Transformation Steering Committee refer to Special Policy No. KK.9-D, on the Governance Procedures of the Board of Directors. These guidelines regulate the following, among others::

1. Responsibilities of the Transformation Steering Committee.
2. Duties and Functions of the Transformation Steering Committee.

3. Duties of the Chairman, Secretary and Members of the Transformation Steering Committee.
4. Procedures for holding meetings.
5. Meeting Minutes.
6. Follow up on Meeting Minutes.

MEMBERSHIP STRUCTURE OF THE TRANSFORMATION STEERING COMMITTEE
Transformation Steering Committee is linked to the Human Capital Organization & GRC

Structure	Position	Voting Rights	Description
Chairman	Directors in charge of Transformation and Risk Management	✓	Permanent member
Directors/SEVP	Director in charge of Human Capital, Compliance, and Legal	✓	Permanent member
	Directors in charge of Funds, Institutions, and Networks	✓	Permanent member
	Other Directors/SEVs as relevant to the discussion	✓	Non-Permanent Member

If the President Director/Vice President Director attends the Transformation Steering Committee Meeting above, he/she will act as Chairman and have voting rights.

Transformation Steering Committee regarding IT, Digital & Network

Structure	Position	Voting Rights	Description
Chairman	Director in charge of Transformation and Risk Management	✓	Chairman) Permanent Member
Directors/SEVP	Director in charge of Information Technology	✓	Permanent member
	Director in charge of Funds and Networks	✓	Permanent member
	SEVP in charge of Digital Business	✓	Permanent member
	Director in charge of Human Capital, Compliance, and Legal	×	Non-Permanent Member
	Other Directors/SEVPs according to the discussion material	✓	Permanent member

If the President Director/Vice President Director attends the Transformation Steering Committee Meeting above, he/she will act as chairman and have voting rights..

Transformation Steering Committee related to Business Process Improvement

Structure	Position	Voting Rights	Description
Chairman	Director in charge of Transformation and Risk Management	✓	Permanent member
Directors/SEVP	Director in charge of Consumer Credit and Fi-nancing	✓	Permanent member
	Director in charge of SME Credit & Retail Funding	✓	Permanent member
	Director in charge of Institutional Funding and Network	✓	Permanent member
	SEVP in charge of Wholesale Banking	✓	Permanent member
	Director in charge of Operations and Customer Experience	✓	Permanent member
	SEVP in charge of Operations	✓	Permanent member
	Director in charge of Human Capital, Compliance, and Legal	×	Non-Permanent Member
	Direktur/Other SEVPs as per the discussion	✓	Non-Permanent Member

If the President/ Vice President Director attends the Transformation Steering Committee Meeting, they will act as the Chairperson and have voting rights.

Transformation Steering Committee related to Partnership & Project Management

Structure	Position	Voting Rights	Description
Chairman	Director in charge of Transformation and Risk Management	✓	Permanent member
Directors/SEVP	Director in charge of Finance	✓	Permanent member
	Director in charge of Human Capital, Compliance, and Legal	×	Permanent member
	Other Directors/SEVPs according to the discussion material	✓	Non-Permanent Member

DUTIES AND RESPONSIBILITIES OF THE TRANSFORMATION STEERING COMMITTEE

1. Responsibilities of the Transformation Steering Committee
   a. The Transformation Steering Committee is responsible for decisions made during the Transformation Steering Committee meetings and Board of Directors meetings.
   b. The Transformation Steering Committee is responsible for submitting reports on Significant Decisions made to the Board of Directors at least once a year.
   c. Establish improvement measures regarding matters related to transformation and report them to the Board of Directors.
2. Duties and Functions of the Transformation Steering Committee
   a. Determine prioritization and decide on the implementation of the Transformation Initiative in line with the Bank's Business Strategy, in the following areas:
      — Human Capital, Organization & Governance, Risk Management and Compliance (GRC).
      — Information Technology (IT), Digital & Network.
      — Commercial Banking & Business Process, Consumer Banking & Sharia.
      — Partnership & Project Management.
   b. Decide policies related to the implementation of Transformation Initiatives.
   c. Propose policies related to Transformation Initiatives to be decided upon in Board of Directors meetings if necessary.
   d. Monitor the implementation of Transformation Initiatives decided by the Transformation Steering Committee and report to the Board of Directors as a basis for follow-up decisions on Transformation Initiatives.
   e. Decision-making authority within the Transformation Steering Committee is adjusted to the regulations and policies applicable to each area of discussion.

PROFILE OF TRANSFORMATION STEERING COMMITTEE MEMBERS

The profiles of the members of the Transformation Steering Committee, both those from the Board of Directors and SEVP of the Company, can be seen in the Company Profile Chapter in the Profile of Directors and Profiles of Officials One Level Below Directors section in this Annual Report.

INDEPENDENCE OF THE TRANSFORMATION STEERING COMMITTEE

All members of the Transformation Steering Committee have no financial, management, share ownership and/or family relationships with the Board of Commissioners, Directors and/or Controlling Shareholders or relationships with the Company, which could affect their ability to act independently.

TRANSPARENCY OF THE CONVERSE POSITIONS OF THE TRANSFORMATION STEERING COMMITTEE

Disclosure of transparency of multiple positions of members of the Transformation Steering Committee from the Board of Directors can be seen in the Corporate Governance Chapter in the dual positions section of this Annual Report.

TERM AND PERIOD OF OFFICE OF THE TRANSFORMATION STEERING COMMITTEE

The term of office and term of office of the Transformation Steering Committee, both from the Board of Directors and SEVP of the Company, follows the terms of office of the Directors and Heads of Divisions of the Company who are members of the committee.

TRAINING AND COMPETENCY DEVELOPMENT

Training for Transformation Steering Committee members from the Board of Directors can be seen in the Training and/or Competency Improvement Sub-chapter for Directors Members in the Corporate Governance Chapter of this Annual Report.

MEETINGS AND IMPLEMENTATION OF TASKS OF THE TRANSFORMATION STEERING COMMITTEE IN 2024

According to Special Policy No. KK.9-D, on the Governance Procedures of the Board of Directors Committee, the Transformation Steering Committee meetings are held at least twice a year. Throughout 2024, the Transformation Steering Committee convened a total of 31 (thirty-one) times. The dates and agendas of the meetings are as follows.

No.	Date	Agenda
1.	January 23, 2024	Steering Committee Project Ultimate January 2024
2.	February 5, 2024	Discussion on Organizational Structure for Large Institutional Funding Division (LIFD) & Midsize Institutional Funding Division (MIFD)
3.	February 15, 2024	Minutes of Meeting of Steering Committee: Progress Report Pilot Initial State Strategic Business Unit
4.	February 5, 2024	Minutes of Steering Committee: IFG Life February 2024
5.	February 19, 2024	Minutes of Steering Committee: IFG Life February 2024
6.	February 15, 2024	Minutes of Steering Committee: Decision Engine
7.	February 27, 2024	Minutes of Steering Committee: Discussion on Proposed Organizational Structure Changes for RFD, SQDD, CCD, and WMD
8.	February 28, 2024	Minutes of Steering Committee: Update Progress BPI KRING
9.	April 3, 2024	Minutes of Steering Committee: Discussion on Implementation Pilot Initial SBU
10.	April 5, 2024	Minutes of Steering Committee: Organizational Structure for Divisions under SEVP Digital Business
11.	May 27, 2024	Minutes of Steering Committee: Discussion on Implementation Pilot Initial SBU
12.	May 31, 2024	Minutes of Steering Committee: Single relationship model for Large commercial segment
13.	May 30, 2024	Presentation of Minutes of Steering Committee on Update BPI SME
14.	June 25, 2024	Minutes of Steering Committee: Problematic Asset Resolution through DIRE and Tokenization
15.	July 16, 2024	Minutes of Steering Committee: Project Digital Branch W3 Juli 2024
16.	July 23, 2024	Minutes of Steering Committee: Preparation of RJPP 2025-2029
17.	July 29, 2024	Minutes of Steering Committee: Update BPI SME
18.	August 13, 2024	Minutes of Steering Committee: DPO Organization Structure
19.	August 13, 2024	Minutes of Steering Committee: Preparation of RJPP 2025-2029
20.	September 19, 2024	Minutes of Steering Committee: Preparation of RJPP 2025-2029
21.	September 24, 2024	Minutes of Steering Committee: Management of Customer Information File (CIF)
22.	September 24, 2024	Minutes of Steering Committee: Decision Engine
23.	September 25, 2024	Minutes of Steering Committee: Project Digital Branch W4 September 2024
24.	October 16, 2024	Minutes of Steering Committee – Plan for CCTV Centralization
25.	October 16, 2024	Minutes of Steering Committee: Project Digital Branch W3 Oktober 2024
26.	October 23, 2024	Minutes of Steering Committee: Organ Funding
27.	October 29, 2024	Minutes of Quick Coordination Call Update: CIF Management
28.	29 October 2024	Presentation of Minutes of Steering Committee on Update BPI SME
29.	November 25, 2024	Minutes of Steering Committee: Project Digital Branch W4 November 2024
30.	December 4, 2024	Minutes of Steering Committee: Capital Call Plan for Venture Capital – Folloow-up to the Board of Directors Meeting on November 18, 2024
31.	December 10, 2024	Minutes of Steering Committee: Strategic Business Unit Plan

Business Committee

The Business Committee is a Company Committee which plays a role in formulating, deciding, supervising, monitoring and evaluating the implementation of business policies and strategies related to products and activities that will be and have been launched by the Company to monitor developments and provide suggestions for improvement steps related to the Company's business.

BUSINESS COMMITTEE WORK GUIDELINES

The Business Committee's work Guidelines refer to Special Policy No. KK.9-D, regarding the Governance Procedures of the Board Committees..

DUTIES AND RESPONSIBILITIES OF THE BUSINESS COMMITTEE

1. The Business Committee is responsible for decisions made at Business Committee Meetings and Board of Directors Meetings.
2. The Business Committee is responsible for submitting reports on Significant Decisions made to the Board of Directors Meeting at least once a year.
3. Determine corrective steps regarding matters related to Bank Product development and report to the Board of Directors.

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BUSINESS MEMBERSHIP STRUCTURE

Based on the agreement, the Business Committee membership is occupied by several positions with the following details:

Structure	Position	Voting Rights	Description
Chairman (concurrently permanent member)	Vice President Director	✓	Chairman) Permanent Member
Directors / SEVP	Director in charge of Institutional Funds and Network*	✓	Permanent member
	Director in charge of Consumer Credit and Financing	✓	Permanent member
	Director in charge of Risk Manage-ment	✓	Permanent member
	Director in charge of Information Technology	✓	Permanent member
	Director in charge of Operations and Customer Experience	✓	Permanent member
	Director in charge SME & Retail Funding	✓	Permanent member
	Director in charge of Human Capital, Compliance, and Legal	×	Permanent member
	SEVP in charge of Wholesale Banking	✓	Permanent member
	SEVP in charge of Digital Business	✓	Permanent member
	SEVP in charge of Finance	✓	Non-Permanent Member
	Director in charge of Asset Manage-ment	✓	Non-Permanent Member

Notes:
a. If the President Director attends the Business Committee meeting, they shall act as the chairperson.
b. *Substitute Chairperson I
c. The Business Committee meeting is deemed to have reached a quorum if attended by more than half of the total Permanent Members.

PROFILE OF BUSINESS COMMITTEE MEMBERS

The profiles of Business Committee members from both the Board of Directors and SEVP of the Company can be seen in the Company Profile Chapter in the Profile of Directors and Profiles of Officials One Level Below Directors section in this Annual Report.

INDEPENDENCE OF THE BUSINESS COMMITTEE

All members of the Business Committee have no financial, management, share ownership and/or family relationships with the Board of Commissioners, Directors and/or Controlling Shareholders or relationships with the Company, which could affect their ability to act independently.

TRANSPARENCY OF MULTIPLE POSITIONS OF THE BUSINESS COMMITTEE

Disclosure of transparency of concurrent positions of members of the Business Committee from the Board of Directors can be seen in the Corporate Governance Chapter in the dual positions section of this Annual Report.

TERM OF OFFICE AND PERIOD OF OFFICE OF THE BUSINESS COMMITTEE

The term of office and term of office of the Business Committee, whether from the Board of Directors or SEVP of the Company, follows the term of office of the Directors and Heads of Divisions of the Company who are members of the committee.

TRAINING AND COMPETENCY DEVELOPMENT

Training for Business Committee members from the Board of Directors can be seen in the Training and/or Competency Improvement Sub-chapter for Directors Members in the Corporate Governance Chapter of this Annual Report..

IMPLEMENTATION OF TASKS OF THE BUSINESS COMMITTEE IN 2024

Following Special Policy No. KK 9-D, regarding the Governance Procedures of the Board Committees, the Business Committee meetings shall be held at least once every three (3) months. During the 2024 period, the Business Committee has held a total of three (3) meetings. The dates and agendas of the Business Committee meetings held are as follows:

No	Date	Agenda
1	February 06, 2024	Development of BTN Paylater Product
2	February 07, 2024	Preparation for BTN Rebranding Implementation
3	April 02, 2024	Plan for Banking Services Cooperation Agreement (PKS) Auto-Debit TWP, and e-TWP Application Integration with the Indonesian Army (TNI-AD)

Environmental, Social and Governance Committee

The ESG Committee plays an active role in providing recommendations to the President Director regarding the management of business practices focused on sustainable development performance (SDG). Additionally, the ESG Committee is actively involved in identifying, measuring, monitoring, and evaluating ESG initiatives embedded in every new product and/or service/activity, so the bank can take the necessary steps in alignment with the Sustainable Development Goals (SDGs), which include:

1. Management of products and services that support the transition process to a low-carbon economy while maintaining social balance by providing equal access to capital (Sustainable Finance).
2. Management of climate change risks and their impacts on ecosystem capacity (Climate Change and Ecosystems).
3. Management of impacts on individuals, communities, and society at large (People and Community).

ENVIRONMENTAL, SOCIAL AND GOVERNANCE COMMITTEE

The work guidelines of the Environmental, Social, and Governance (ESG) Committee refer to Special Policy No. KK.9-D, regarding the Governance Procedures of the Board Committees

DUTIES AND RESPONSIBILITIES OF THE ENVIRONMENTAL, SOCIAL AND GOVERNANCE COMMITTEE

The task of the Environmental, Social and Governance (ESG) Committee is to evaluate and provide recommendations to the President Director regarding ESG, including:

1. Decisions on the Bank's strategy impacting the environment, social aspects, and governance within the ESG program and roadmap.
2. Monitoring the implementation of the Bank's ESG strategy and roadmap.
3. Providing information to the Bank's management regarding ESG-related issues, including legislation, government programs, international developments, future business trends, and climate change.
4. Monitoring, evaluating, and providing recommendations on ESG reports, investor concerns, or other third-party feedback regarding ESG implementation.
5. Making decisions related to:
   a. Objectives and implementation guidelines of the TJSL Program.
   b. Mapping and Development of the TJSL Program TJSL.
   c. Evaluation of the TJSL Program implementation.

ENVIRONMENTAL, SOCIAL AND GOVERNANCE COMMITTEE MEMBERSHIP STRUCTURE

The Environmental, Social, and Governance (ESG) Committee is structured as follows:

Structure	Position	Voting Rights	Description
Chairman	President Director	✓	Permanent member
Directors / SEVP	Vice President Director*	✓	Permanent member
	Director in charge of Risk Management **)	✓	Permanent member
	Director in charge of Finance	✓	Permanent member
	Director in charge of Consumer Credit/Financing	✓	Permanent member
	Director in charge of Asset Management	✓	Permanent member
	Director in charge of Human Capital and Compliance	×	Permanent member
	SEVP Wholesale Banking	✓	Permanent member
	Other Directors/SEVPs as relevant to the discussion topics	✓	Non-Permanent Member

Notes:
*) Substitute Chairman I
**) Substitute Chairman II

PROFILE OF ENVIRONMENTAL, SOCIAL AND GOVERNANCE COMMITTEE MEMBERS

The profiles of members of the Environmental, Social and Governance (ESG) Committee, both those from the Board of Directors and SEVP of the Company, can be seen in the Company Profile Chapter in the Profile of Directors and Profiles of Officers One Level Below Directors section in this Annual Report. .

INDEPENDENCE OF THE ENVIRONMENTAL, SOCIAL AND GOVERNANCE COMMITTEE

All members of the Environmental, Social and Governance (ESG) Committee have no financial, management, share ownership and/or family relationships with the Board of Commissioners, Directors and/or Controlling Shareholders or relationships with the Company, which could affect their ability to act independently.

TRANSPARENCY OF MULTIPLE POSITIONS OF THE COMMITTEE ENVIRONMENTAL, SOCIAL AND GOVERNANCE

Disclosure of transparency of multiple positions of members of the Environmental, Social and Governance (ESG) Committee from the Board of Directors can be seen in the Corporate Governance Chapter in the dual positions section of this Annual Report.

TERM OF OFFICE AND PERIOD OF OFFICE OF THE COMMITTEE ENVIRONMENTAL, SOCIAL AND GOVERNANCE

The term of office and period of office of the Environmental, Social and Governance (ESG) Committee, whether from the Board of Directors or SEVP of the Company, follows the term of office of the Directors and Heads of Divisions of the Company who are members of the committee. .

TRAINING AND COMPETENCY DEVELOPMENT

Training for Environmental, Social and Governance (ESG) Committee members from the Board of Directors can be seen in the Training and/ or Competency Improvement Sub-chapter for Directors Members in the Corporate Governance Chapter of this Annual Report.

IMPLEMENTATION OF THE DUTIES OF THE ENVIRONMENTAL, SOCIAL AND GOVERNANCE COMMITTEE IN 2024

The meeting policy of the Environmental, Social, and Governance (ESG) Committee is regulated under the Governance Procedures of the Board Committees. Based on this policy, ESG Committee meetings shall be held at least twice a year. In 2024, the ESG Committee has conducted a total of five meetingss. The dates and agendas of these meetings are as follows.

No.	Date	Agenda
1,	January 16, 2024	Discussion on Updated ESG Rating, KU ESG & Revamp Quick Wins, and 2024 Strategic Initiatives
2,	June 26, 2024	Discussion on ESG Initiatives 2024, Proposed Quantitative ESG Targets 2025-2029, and BTN's Eco-Friendly Housing Project
3,	July 23, 2024	Discussion on Climate Risk Stress Test (CRST) Report
4,	September 24, 2024	Discussion on MSCI ESG Rating
5,	November 25, 2024	Discussion on Sustainable Finance Action Plan for 2025

Implementation of Governance in Providing Remuneration for Commercial Banks

Remuneration and Nomination Committee

Regarding the remuneration aspect, the Remuneration and Nomination Committee has the duty and responsibility to evaluate remuneration policies based on performance, risk, fairness with peer groups, targets and long-term strategies of the Company, fulfillment of reserves as regulated in statutory regulations and income potential.

Company in the future. The description regarding the names of members, composition, duties and responsibilities as well as the number of Committee meetings has been presented in the Remuneration and Nomination Committee Sub-Chapter in the Corporate Governance Chapter of this Annual Report.

Based on a copy of the OJK Regulation No. 34/POJK.04/2014 concerning the Nomination and Remuneration Committee of Issuers or Public Companies Article 10 paragraphs 2 and 3, the Company provides a 2024 remuneration package to members of the Remuneration and Nomination Committee other than members of the Board of Commissioners and an executive officer (ex officio) in the following table:

Remuneration and Nomination Committee	Amount of Remuneration Received (Honorarium, THR and PPh 21 allowance)
MOCH. AMIN NURDIN	1,183,685,358
Total	**1,183,685,358**

Remuneration Policy Preparation Process

As part of the implementation of Good Corporate Governance (GCG), the company ensures that the remuneration policy is formulated based on the principles of transparency, accountability, responsibility, independence, and fairness.

In 2024, the company issued new provisions to refine the previous remuneration policy, namely Special Policy (KK) No. 3-B on Remuneration. This policy is designed to ensure that the compensation and benefits system remains competitive and aligned with the developments in the banking industry and applicable regulations.

As part of the Human Capital management strategy, the remuneration policy is designed to provide fair and competitive rewards to employees based on factors such as performance achievements, position, competence, and labor market conditions. The implementation of this policy aims to increase motivation, retain top talent, and drive employee productivity to support sustainable business growth.

The remuneration policy is designed to support good corporate governance by applying the principle of alignment between performance, risk, and reward, ensuring that compensation given to employees does

not encourage excessive risk-taking. This is in line with prudential banking practices, where risk management is carried out in a measured way to maintain financial health and the company's sustainability.

Additionally, in its formulation, the remuneration policy considersfairnessandcompetitivenessbybenchmarking remuneration practices in the banking industry and taking into account employees' contributions to the company's performance achievements. Through this policy, the company is committed to creating a competitive and highly competitive work environment, while continuing to prioritize compliance with applicable regulations and GCG principles.

Remuneration Policy Coverage and Implementation per Business Unit, Per Region and in Subsidiary Companies or Branch Offices Located Abroad

The Company's remuneration policy has taken into consideration the geographical areas of the Head Office, Regional Offices and Branch Offices concerned. The Company has a policy of providing regional allowances for certain areas in accordance with the Board of Directors' decision as stipulated in KK 3-B 2023 concerning Remuneration and implemented as stipulated.

Remuneration is Linked to Risk

In determining the risks associated with variable remuneration, the Company pays attention to the risks that are most influential in business activities as the main risks referring to regulatory provisions governing the implementation of risk management for commercial banks. Remuneration that is linked to performance and risk includes bonuses or other equivalent forms..

Performance Measurement Linked to Remuneration

1. **Remuneration Policy is linked to performance assessment**
   The Company has a policy regarding the Performance Management System which stipulates that salary increases based on pay for performance are regulated in separate provisions regarding the Basic Salary Policy.
2. **Method that links individual remuneration with company performance, work unit performance and individual performance The policy in the Company's Performance**
   Management System regulates performance target assessments which include work targets including company work targets (SKP), unit work targets (SKU) and individual work targets (SKI). Assessment of work targets is carried out by comparing the realization of work target achievements with the respective work targets. The Company's Performance Management System Policy also regulates the assessment of corporate cultural competence and leadership competence for subordinate employees. .
3. **The method used by the Company to state that the agreed performance cannot be achieved so that adjustments to remuneration and the amount of remuneration adjustments need to be made if such conditions occur**
   The company carries out a method of adjusting remuneration related to performance achievement through a policy of increasing the basic salary every year, determined by the value of the previous year's Performance Management System and Comparatio. In this case, Comparatio can be interpreted as a percentage value calculated based on the position of the Permanent Employee's basic salary towards the midpoint in the Basic Salary range of the position held by the Permanent Employee in question. In order to retain quality employees, the Company provides Production Services as a form of remuneration which is directly linked to employee performance assessments which are reflected in the Performance Management System (SMK).

Remuneration Adjustments Linked to Performance and Risk

The company can postpone the payment of deferred variable remuneration (Malus) or withdraw variable remuneration that has been paid (Clawback) to officials who are classified as Material Risk Takers (MRT), by considering several factors, including:

1. The amount of loss or damage to the Company's reputation.
2. Involvement of the employee concerned directly or indirectly regarding the actions or transactions carried out.

Parties who become Material Risk Takers at least meet the following criteria:

1. Directors and/or other employees who, due to their duties and responsibilities, make decisions that have a significant impact on the Company's risk profile or;
2. Directors, Board of Commissioners and/or employees who receive variable remuneration with a large value.

The period for deferring variable remuneration to Material Risk Takers (MRT) is at least 3 (three) years, with the deferred percentage set at 10% to 30% of the variable remuneration received where the determination of the deferred percentage is determined by the Board of Directors.

The implementation of Malus will be imposed on Officials who are classified as Material Risk Takers with the following conditions and/or criteria:

1. Causing significant damage to the Company's reputation or having a negative impact on the Company's finances and the Company's business opportunities.
2. Causing significant financial losses to the Company.
3. Committing fraud, unethical behavior, and/or falsifying records.
4. Causing material risks or providing false financial statements.
5. Deliberately violating the Company's regulatory policies and procedures.
6. Causing significant losses to related work units due to not implementing good risk management.
7. Causing a significant negative impact on the Company's capital that is not caused by changes in the economic or industrial climate.
8. Intentionally disclose the Company's confidential information to external parties.
9. Carrying out actions that could cause employees to be terminated from the Company.

Name of External Consultant and Consultant Duties Related to Remuneration Policy

Bank BTN collaborates with Willis Towers Watson who is tasked with carrying out benchmarking and/or Salary Surveys in accordance with company requests regarding remuneration policies.

Remuneration and Facilities Packages Received by the Board of Directors and Board of Commissioners

The remuneration and facilities received by the Board of Directors and Board of Commissioners in 1 (one) year include the remuneration structure and details of nominal amounts, as in the table below:

Types of Remuneration and Other Facilities	Board of Commissioners		Directors	
	People	Million Rp	People	Million Rp
Remuneration				
Honorarium/Salary	10[1)]	17,752	11[2)]	44,767
Routine allowance (Tj. PPh21)	10[1)]	9,854	11[2)]	33,950
Holiday allowance	10[1)]	1,623	11[2)]	3,791
Tantiem	8[1)]	40,925	10	103,434
Total Remuneration (a)		70,154		185,942
Post-Service Insurance	10	3,767	11	12,591
Housing Benefit	-	-	11	3,575
Transportation Allowance	10	3,415	11	13,120
Communications Allowance	-	-	11	305
Total Other Facilities (b)		7,182		29,591
Total Received (a) + (b)		77,336		215,533

Notes:
1) Including one member of the Board of Commissioners who no longer serves as of March 6, 2024.
2) Including one member of the Board of Directors who starts serving as of March 6, 2024.

Remuneration for the Board of Commissioners and Directors in one year is grouped into the following income level ranges::

Amount of Remunera-tion	Number of Board of Commis-sioners		Number of Directors	
	2024	2023	2024	2023
Above IDR 2 billion	10[4]	10[1]	11[5]	11[2]
Above IDR 1 billion - IDR 2 billion				
Above IDR 500 million - iDR 1 billion		1[3]		
IDR 500 million and elow				

Notes:
1) Including one member of the Board of Commissioners who no longer serves as of October 14, 2022.
2) Including one member of the Board of Directors who no longer serves after the Annual General Meeting of Sharholders (AGMS) on March 16, 2023.
3) The number of Board of Commissioners members who no longer serve after the Annual General Meeting of Shareholders (AGMS) on March 2, 2022.
4) Including one member of the Board of Commissioners who no longer serves as of March 6, 2024.
5) Including one member of the Board of Directors who starts serving as of March 6, 2024..

Variable Remuneration

Provisions related to remuneration are regulated in Special Policy KK.3-B on Remuneration and Special Policy KK.3-D on the Income of the Board of Directors, Board of Commissioners, SEVP, and Board of Commissioners' Organs. Variable Remuneration is provided in the form of cash and shares or share-based instruments issued by the Company. In determining the risks associated with Variable Remuneration, the company considers the most influential risks in business activities as key risks, referring to regulatory provisions governing the implementation of risk management for commercial banks.

Number of Directors, Board of Commissioners and Employees Receiving Variable Remuneration for 1 (One) Year

Number of Directors, Board of Commissioners and Employees who receive Variable Remuneration for 1 (one) year and the total nominal amount.

Amount received											
Directors				Board of Commissioners				Officer[2]			
People		Million Rp.		People		Million Rp.		People		Million Rp.	
2024	2023	2024	2023	2024	2023	2024	2023	2024	2023	2024	2023
10	9[1]	103.433	85.896	8[3]	10[2]	40.925	38.204	12.114	11.858	607.874	609.329

Note:
1) 1 (one) member of the Board of Directors no longer serves after the Annual General Meeting of Shareholders (AGMS) on March 16, 2023.
2) 1 (one) member of the Board of Commissioners no longer serves as of October 14, 2022, and one member of the Board of Commissioners no longer serves after the Annual General Meeting of Shareholders (AGMS) on March 2, 2022.
3) 1 (one) member of the Board of Commissioners no longer serves as of March 6, 2024.
4) Consists of employees who receive Production Service / Bonus.

Position and Number of Parties Who Are Material Risk Takers

In determining employees identified as MRT, the Bank takes a qualitative approach. Positions classified as MRT are as follows:

1. President Director and all members of the Board of Directors for implementation from year 1 to year 3.
2. Main Director, all members of the Board of Directors, Heads of Business Divisions, Heads of Regional offices, and Heads of Branches for implementation in the 4th year and thereafter.
3. The Board of Directors determines the position of head of the Business Division classified as MRT when the policy is implemented

No.	Position	Number of Parties that Become MRT
1.	President Director	1
2.	Vice President Director	1
3.	Director	9
4.	President Commissioner	1
5.	Vice President Commissioner	1
6.	Member of the Board of Commissioners	7

Shares Options held by Directors, Board of Commissioners and Executive Officers

The Company has a share ownership program by management or the Management Stock Option Program (MSOP) and by employees or the Employee Stock Option Program (ESOP) as part of appreciation for management and all employees. The policy of granting share options at the Extraordinary General Meeting of Shareholders (EGMS) held on 6 October 2009 approved the issuance of new shares in the Company's savings a maximum of 30% or a maximum of 2,723,142,857 shares of the total shares that have been issued and fully paid up after the issuance of new shares so that the ownership of the Republic of Indonesia becomes at least 70% or 6,354,000,000 shares of all shares that have been issued and fully paid up after issuance of new shares.

The issuance of new shares in the savings in question is offered to the public through an Initial Public Offering (IPO) which includes the allotment of shares to Management and Employees or Management and Employee Stock Allocation (MESA) as well as the granting of option rights to Management and Employees or Management and Employee Stock Options Plan (MESOP).

Disclosure of Shares Option Stages 1, 2, 3 Directors, Commissioners and Executive Officers of the Bank as of 31 December 2024

MESOP Level 1

No.	Name and Positions	Number of Shares Owned (Shares)	Number of Options		Option Price (Rp.)	Time period
			Provided (Shares)	Which Has Been Executed (Shares)		
Board of Commissioners						
1.	Chandra Martha Hamzah	-	-	-	-	-
2.	Iqbal Latanro	-	-	-	-	-
3.	Ahdi Jumhari Luddin	-	-	-	-	-
4.	Andin Hadiyanto	-	-	-	-	-
5.	Armand B. Arief	-	-	-	-	-
6.	Herry Trisaputra Zuna	-	-	-	-	-
7.	Himawan Arief S.	-	-	-	-	-
8.	Sentot A. Sentausa	-	-	-	-	-
Directors						
1.	Haru Koesmahargyo	-	-	-	-	-
2.	Nixon L. Pahotan Napitupulu	-	-	-	-	-
3.	Andi Nirwoto	-	-	-	-	-
4.	Jasmin	-	-	-	-	-
5.	Setiyo Wibowo	-	-	-	-	-

No.	Name and Positions	Number of Shares Owned (Shares)	Number of Options		Option Price (Rp.)	Time period
			Provided (Shares)	Which Has Been Executed (Shares)		
6.	Elisabeth Novie Riswanti	-	76,500	76,500	855	Feb 2011-Ags 2014
7.	Hirwandi Gafar	-	58,000	58,000	855	Feb 2011-Ags 2014
8.	Nofry Rony Poetra	-	77,000	77,000	855	Feb 2011-Ags 2014
9 .	Eko Waluyo	-	51,000	51,000	855	Feb 2011-Ags 2014
Executive Officer		7,430,600	6,925,500	6,925,500	855	Feb 2011-Ags 2014
Employee		-	136,751,500	136,751,500	855	Feb 2011-Ags 2014

MESOP Level 2

No.	Nama dan Jabatan	Number of Shares Owned (Shares)	Jumlah Opsi		Option Price (Rp.)	Time period
			Provided (Shares)	Which Has Been Executed (Shares)		
Board of Commissioners						
1.	Chandra Martha Hamzah	-	-	-	-	-
2.	Iqbal Latanro	-	-	-	-	-
3.	Ahdi Jumhari Luddin	-	-	-	-	-
4.	Andin Hadiyanto	-	-	-	-	-
5.	Armand B. Arief	-	-	-	-	-
6.	Herry Trisaputra Zuna	-	-	-	-	-
7.	Himawan Arief S.	-	-	-	-	-
8.	Sentot A. Sentausa	-	-	-	-	-
Directors						
1.	Haru Koesmahargyo	-	-	-	-	-
2.	Nixon L. Pahotan Napitupulu	-	-	-	-	-
3.	Andi Nirwoto	-	-	-	-	-
4.	Jasmin	-	-	-	-	-
5.	Setiyo Wibowo	-	-	-	-	-
6.	Elisabeth Novie Riswanti	-	55,000	55,000	1,297.44	Feb 2012-Ags 2015
7.	Hirwandi Gafar	-	43,000	43,000	1,297.44	Feb 2012-Ags 2015
8.	Nofry Rony Poetra	-	59,500	59,500	1,297.44	Feb 2012-Ags 2015
9 .	Eko Waluyo	-	41,000	41,000	1,297.44	Feb 2012-Ags 2015
Executive Officer		7,430,600	5,467,500	5,467,500	1,297.44	Feb 2012-Ags 2015
Employee		-	102,442,500	102,442,500	1,297.44	Feb 2012-Ags 2015

MESOP Level 3

No.	Name and Positions	Number of Shares Owned (Shares)	Number of Options		Option Price (Rp.)	Time period
			Provided (Shares)	Which Has Been Exe-cuted (Shares)		
Board of Commissioners						
1.	Chandra Martha Hamzah	-	-	-	-	-
2.	Iqbal Latanro	-	-	-	-	-
3.	Ahdi Jumhari Luddin	-	-	-	-	-
4.	Andin Hadiyanto	-	-	-	-	-
5.	Armand B. Arief	-	-	-	-	-
6.	Herry Trisaputra Zuna	-	-	-	-	-
7.	Himawan Arief S.	-	-	-	-	-
8.	Sentot A. Sentausa	-	-	-	-	-
Directors						
1.	Haru Koesmahargyo	-	-	-	-	-
2.	Nixon L. Pahotan Napitupulu	-	-	-	-	-
3.	Andi Nirwoto	-	-	-	-	-
4.	Jasmin	-	-	-	-	-
5.	Setiyo Wibowo	-	-	-	-	-
6.	Elisabeth Novie Riswanti	-	56,000	56,000	1,098.36	Feb 2013-Ags 2016
7.	Hirwandi Gafar	-	47,500	47,500	1,098.36	Feb 2013-Ags 2016
8.	Nofry Rony Poetra	-	61,500	61,500	1,098.36	Feb 2013-Ags 2016
9.	Eko Waluyo	-	44,500	44,500	1,098.36	Feb 2013-Ags 2016
Executive Officer		7,430,600	5,566,500	5,566,500	1,098.36	Feb 2013-Ags 2016
Employee		-	102,367,500	102,367,500	1,098.36	Feb 2013-Ags 2016

The MESA and MESOP programs were completed in 2016. Since then Bank BTN has had no Share Option program for Directors, Board of Commissioners, Executive Officers and Employees.

Highest and Lowest Salary Ratio

Salary Ratio	2024	2023
Highest and Lowest Employee Salaries	25,00 : 1	22,44 : 1
Highest and Lowest Directors' Salaries	1,18 : 1	1,18 : 1
Highest and Lowest Commissioner Salaries	1,11 : 1	1,11 : 1
Highest Directors' and Highest Employees' Salaries	2,89 : 1	2,92 : 1

Notes:
* The highest employee salary is that of a permanent employee with the highest salary.
* The lowest employee salary is that of a permanent employee with the lowest salary.

Number of Recipients and Total Amount of Variable Remuneration that is Unconditionally Guaranteed

Bank BTN does not have a policy of granting Variable Remuneration (RBV) and without conditions, because the policy of granting RBV is applied uniformly without considering the length of the work period. Bank BTN is committed to implementing a competitive, fair and balanced remuneration system and always ensuring that no employee receives compensation below the provisions set by the Government. Bank BTN also reviews and updates its remuneration policy so that it is relevant to industrial developments and business strategies and gradually adopts aspects of compliance with applicable banking regulations regarding remuneration.

Number of Employees Affected by Termination of Employment and Total Nominal Severance Pay Paid

Table of Limited Voluntary Pension Program (PPST)

No.	The nominal amount of sever-ance pay paid per person in 1 (one) year	Number of PPST Employees	
		2024	2023
1.	Above IDR 1 billion	2	-
2.	Above IDR 500 million - 1 billion	2	6
3.	IDR 500 million and below	-	1

Total Amount of Deferred Variable Remuneration

Deferred Variable Remuneration in 2024		Deferred Variable Remuneration in 2023	
Cash	Rp 6.977 million	Cash	Rp 4,961 million
Share	19.886.798 (shares)	Share	13,398,206 (shares)

Total Amount of Deferred Variable Remuneration Paid for 1 (One) Year

Deferred Variable Remuneration in 2024		Deferred Variable Remuneration in 2023	
Cash	Rp, 1,818,911,901	Cash	Rp 603,096,246
Share	4,989,708 (shares)	Share	1,757,934 (lembar)

Total Amount of Deferred Variable Remuneration Paid for 1 (One) Year

A. Fixed Remuneration

Type of Remuneration	Amount
Cash	148,509 million
Shares/share-based instruments issued by Bank BTN	-

B. Variable Remuneration

Type of Remuneration	Not Delayed	Postponed
Cash	115,487 million	5,193 million
Shares	-	11,410,700 (shares)

Informasi Kuantitatif

Variable Types of Remuneration	Not Delayed	Postponed
Cash	115,487 million	6,978 million
Shares	-	19,886,798 (shares)

Public Accountant

External Audit Function

The Company appoints an External Auditor to conduct an audit of the Financial Statements for the Fiscal Year 2024. This is in compliance with the Financial Services Authority Regulation No. 37/PJOK.03/2019 on Transparency and Publication of Bank and Regulation of the Minister of State-Owned Enterprises Number PER-2/MBU/03/2023 concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises. The External Auditor is required to provide accountable, independent, and fair information and data, particularly regarding financial, operational, and regulatory compliance aspects.

External audits are carried out by independent parties who have fulfilled the requirements to ensure that the Company's accounting records are required to report Bank Risk profiles Bank Wide. The risk profile report includes an assessment of Inherent Risk and an assessment of the Quality of the Company's Risk Management Implementation. prepared in accordance with the provisions of the Statement of Accounting and Financial Standards (PSAK) and the reports prepared present the financial position and business results fairly and the business operations carried out by the Company do not violate the provisions of the applicable regulations.

Appointment of Public Accountant

The Company appointed a public accounting firm (KAP) through the GMS in connection with the need for an Audit of Financial Reports for the 2023 Fiscal Year. The appointment of a Public Accountant (AP) and Public Accounting Firm was carried out through a tender mechanism for the procurement of general audit services, with the following qualifications:

1. Is a Public Accounting Firm that is ranked in the top 10 (ranking based on the official Public Accounting Firm association);
2. Have a certificate of affiliation with an international KAP;

3. Have experience conducting general audits on banks that have gone public and have assets of at least IDR 100 trillion;
4. Having experience in auditing the Micro and Small Business Funding Program (PUMK).
5. The Public Accounting Firm (KAP) and Public Accountant (AP) are actively registered with the Financial Service Authority (OJK), the Ministry of Finance, and the Audit Board of Indonesia (BPK).
6. The KAP and AP are not currently subject to any sanctions by the OJK or the Ministry of Finance.
7. The KAP has at least 100 (one hundred) auditors or another number according to the Company's risk intensity.
8. The appointment of the Signing Partner (the responsible Partner) by the Public Accounting Firm may be carried out for a maximum audit period of 7 (seven) cumulative fiscal years. The Signing Partner may be reappointed after a cooling–off period of 5 (five) consecutive fiscal years.
9. To ensure a fresh eye perspective, the audit team must be rotated if an auditor has audited the Company for more than 5 (five) years.
10. The Public Accounting Firm's Service Agreement must at least include the audit scope following SEOJK No. 18/SEOJK.03/2023 and OJK Regulation No 9. Of 2023, including a review of the achievement of the Board of Directors' Key Performance Indicator (KPI), collectively and individually, as stipulated in the Regulation of the Minister of State-Owned Enterprises No. PeR-2/MBU/03/2023 concerning Guidelines for Governance, and Significant Activities of State own Enterprises; and
11. AP, KAP and people within KAP in providing services are required to fulfill independent conditions during the audit period and professional assignment period, which are stated in a Statement Letter and submitted by KAP before the professional assignment period begins.

The Board of Commissioners based on the proposal of the Audit Committee has appointed the Public Accounting Firm KAP, Sungkoro & Surja (Ernst & Young Global Limited) as the winner of the procurement for Public Accounting Firm Services for 2024. This firm will audit the Financial Statements of PT Bank Tabungan Negara Tbk for the 2024 fiscal year, as stated in the Board of Commissioners' letter No. 2/KOM/BTN/I/2024 dated January 10, 2024. Furthermore, the General Meeting of Shareholders (GMS) of PT Bank Tabungan Negara (Persero) Tbk on March 6, 2024, approved the appointment of the Public Accounting Firm KAP Purwantono, Sungkoro & Surja (Ernst & Young Global Limited), as stipulated in the Forth Agenda Item. The legal basis for the audit assignment of the Financial Statement and the Financial Statements of the Micro and Small Business Funding Program (PUMK) for the 2024 fiscal year of PT Bank Tabungan Negara (Persero) Tbk has been formalized in the Cooperation Agreement (PKS) No. 06/PKS/FAD/XI/2024 dated November 20, 2024.

The appointment process for Public Accounting Firm (KAP) services follows the regulations set by the Financial Services Authority (OJK), specifically POJK Number 9 of 2023 on the Use of Public Accountant and Public Accounting Firm Services in Financial Services Activities. The procedures for using KAP services refer to SE OJK Number 18/SEOJK.03/2023, which outlines the guidelines for utilizing Public Accountant and Public Accounting Firm services in financial services activities. Under these provisions, The Company has limited the use of audit services for annual historical financial information from the same Public Accountant (AP) to a cumulative period of 7 (seven) years
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Public Accounting Firm, Name of Accountant and Fee

Table of Public Accounting Firms, Accountant Names and Fees Year Public accounting firm Period CHAP Name

Year	Public accounting firm	Period CHAP	Name of Accountant (Responsible Partner)	AP eriod	*Audit Service Fee*
2024	Purwantono, Sungkoro & Surja	10th period	Christophorus Alvin Kossim	2nd period	Rp5,075,000,000
2023	Purwantono, Sungkoro & Surja	9th period	Christophorus Alvin Kossim	1st period	Rp4,800,000,000
2022	Purwantono, Sungkoro & Surja	8th period	Muhammad Kurniawan	2nd period	Rp4,390,000,000
2021	Purwantono, Sungkoro & Surja	7th period	Muhammad Kurniawan	1st period	Rp4,050,000,000
2020	Purwantono, Sungkoro & Surja	6th period	Yovita	1st period	Rp3,249,000,000
2019	Purwantono, Sungkoro & Surja	5th period	Muhammad Kurniawan	Period to 1	Rp2,650,000,000
2018	Purwantono, Sungkoro & Surja	4th period	Yasir	2nd period	Rp2,367,000,000
2017	Purwantono, Sungkoro & Surja	3rd period	Yasir	1st period	Rp2,290,000,000

Fees and Other Services Provided by Accountants

During 2024, no other services were provided by accountants.

Audit Opinion

Year	Audit Opinion
2024	Reasonable Without Exceptions
2023	Reasonable Without Exceptions
2022	Reasonable Without Exceptions
2021	Reasonable Without Exceptions
2020	Reasonable Without Exceptions
2019	Reasonable Without Exceptions
2018	Reasonable Without Exceptions

Internal Control System

The implementation of the internal control system is carried out in order to support the achievement of the Company's performance objectives, increase value for stakeholders, minimize the risk of loss and maintain compliance with applicable laws and regulations. The Company implements an internal control system as an important supervisory component in the management of the Company and as a reference for healthy and controlled operational activities. The Company refers to COSO (Committee of the Sponsoring Organizations of the Treadway Commission) - Internal Control Integrated Framework in preparing an internal control framework to ensure the adequacy of operational and financial controls, financial reporting, operational effectiveness and efficiency, as well as compliance with applicable laws and regulations.

Control Objectives

1. Compliance with statutory provisions and regulations, both regulations issued by the Government, Regulators, and internal regulations established by the Bank.
2. Availability of financial reporting with integrity that is correct, accurate, complete, and timely, implemented in accordance with the provisions of laws and regulations in the financial services sector and financial accounting standards.
3. Effectiveness and efficiency in the Bank's business activities.
4. Increasing the effectiveness of risk culture in the Bank organization as a whole.
5. To increase company value
6. Realizing sustainable governance that is able to maintain economic stability and is inclusive in nature, prioritizing harmony between economic, social and environmental aspects in all activities and processes that are carried out and implemented by prioritizing Environmental, Social and Governance (ESG) aspects).

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Supervision by Management and Control Culture

The Board of Commissioners is responsible for ensuring that the Board of Directors has monitored the effectiveness of the implementation of the internal control system, so that the Board of Commissioners has an active role in ensuring that there are improvements to the Company's problems that can reduce the effectiveness of the internal control system. The Board of Directors is responsible for establishing policies and strategies as well as internal control procedures. The Board of Directors is also responsible for monitoring the adequacy and effectiveness of the internal control system. The Board of Commissioners and Directors are responsible for improving work ethics and high integrity as well as creating an organizational culture that emphasizes to all Bank employees the importance of internal control that applies in the Company.

Furthermore, the monitoring process by management and a wellimplemented control culture encourage the creation of a Control Environment that reflects the overall commitment, behavior, concern and steps taken by the Board of Commissioners and Directors in carrying out the Bank's operational control activities. The Control Environment elements include:

1. Adequate organizational structure and human resource development.
2. Leadership style and the Bank's Management philosophy.
3. Integrity, ethical values, and competence of all employees.
4. The Bank's human resources policies and procedures.
5. Attention and direction provided by the Board of Directors and other committees such as the Risk Management Committee
6. Methods adopted by Bank Management in carrying out their authority and responsibilities; And
7. External factors that influence Bank operations and the implementation of risk management.

Risk Identification and Assessment

Risk assessment is a series of actions carried out by the Board of Directors to identify, analyze and evaluate the risks faced by the Bank in achieving its business objectives. Risks may arise or change depending on the

Bank's conditions. The Bank must continuously identify and assess risks that may impact the achievement of its objectives. Internal control needs to be appropriately reviewed if there are risks that have not been mitigated, whether they are pre-existing or newly emerging risks. The review process includes continuously evaluating the impact of environmental and situational changes as well as assessing the effects on target achievement and the effectiveness of internal controls in the Bank's operational activities.

Operational, Financial Control and Compliance with Legislation

Control Activities and Separation of Functions

Control activities must involve all Bank employees because it is an activity that is inseparable from every day-to-day function or activity of the Bank. Therefore, control activities will be effective if they are planned and implemented to control the risks that have been identified. Control activities include establishing control policies and procedures such as determining authority, authorization, reconciliation, verification, assessment of work performance, division of tasks and safeguarding company assets.

1. Control Activities
   Control activities include policies, procedures and practices that provide confidence to Bank officials and employees that the Directors' directions have been implemented effectively. These control activities can assist the Bank's Board of Directors, including the Board of Commissioners, in managing and controlling risks that could affect performance or result in Bank losses. Control activities are implemented at all functional levels in accordance with the Bank's organizational structure, which includes at least:
   a. Management Reviews (Top Level Reviews)
      Bank's Board of Directors periodically requests explanations (information) and operational performance reports from officials and employees so that it is possible to review progress results (realization) compared to the targets to be achieved. Based on this review, the Bank's Board of Directors can immediately detect problems such as control weaknesses, financial reporting errors or fraud.
   b. Operational Performance Review
      (functional review) Reviews carried out by the Internal Audit Division periodically include:
      1) Review the risk assessment (risk profile report) produced by the Risk Management Work Unit.
      2) Analyze operational data, both risk-related data and financial data, namely verifying transaction details and activities compared to the output (report) produced by the Risk Management Work Unit.
      3) Review the realization of the implementation of the work plan and budget, in order to identify the causes of significant deviations and determine requirements for corrective actions..
   c. Information Systems Control
      Information System control is carried out by verifying the accuracy and completeness of transactions in accordance with internal regulations. Information system control activities can be classified into 2 (two) criteria, namely:
      1) General control, including control over data center operations, software procurement and maintenance systems, access security, as well as development and maintenance of existing application systems. This general control is applied to mainframes, servers, and user workstations, as well as internal-external networks.
      2) Application control, applied to the programs used by the Bank in processing transactions and to ensure that all transactions are correct, accurate and have been properly authorized. In addition, application controls must be able to ensure the availability of an effective audit process and to check the correctness of the audit process in question.
   d. Control of Physical Assets
      Physical asset control is implemented to ensure the implementation of physical security for the Bank's assets. This activity includes securing assets, records and limited access to computer programs and data files, as well as comparing the value of the Bank's assets and liabilities with the value stated in the control records, in particular checking asset values periodically.
   e. Documentation
      Banks at least formalize and document policies, procedures, accounting systems and standards as well as adequate audit processes. This documentation must be updated periodically to reflect the Bank's actual operational activities and must be communicated to Bank officials and employees. Upon request, documents must always be available for the benefit of internal auditors, public accountants and bank supervision by regulators. The accuracy and

availability of documents must be assessed by internal auditors when conducting routine and non-routine audits.

2. Separation of Functions
   Separation of functions or what is known as the "Four Eyes Principle" is intended so that each person in their position does not have the opportunity to commit and hide mistakes or deviations in the implementation of their duties at all levels of the organization and all steps of operational activities, through the following matters:
   a. The bank determines procedures (authorities) including determining a list of officers who can access high-risk transactions or business activities.
   b. Avoid giving authority and responsibility which could give rise to various conflicts of interest.

Accounting, Information and Communication Systems

The information and communication system is a process of presenting reports regarding operational, financial activities, as well as compliance and adherence to statutory provisions by the Bank.

1. The accounting system includes methods and records for identifying, grouping, analyzing, classifying, recording or posting, and reporting Bank transactions. To ensure accounting data is accurate and consistent with available data based on system processing results, the reconciliation process between accounting data and the management information system must be carried out periodically. Any irregularities that occur must be immediately investigated and the problem resolved. The reconciliation process must also be documented as part of the overall audit trail process requirements.
2. The information system must be able to produce reports regarding business activities, financial conditions, implementation of risk management and compliance with statutory provisions and regulations. This information system includes a system for storing and using electronic data whose security is guaranteed, monitored by an independent party (internal auditor) and supported by an adequate contingency program.
3. The communication system must be able to provide information to all parties, both internal and external, shareholders and Bank customers.
   .

Compliance Control with Other Legislation

In carrying out control of compliance with statutory regulations, the Company has a Compliance Function which is carried out by the Compliance and Governance Division. The Compliance and Governance Division has duties and responsibilities, including establishing compliance systems and procedures that will be used to formulate the Company's internal regulations and guidelines, ensuring that all policies, provisions, systems and procedures, as well as business activities carried out by the Company are in accordance with OJK regulations. , Bank Indonesia and applicable laws and regulations, including Sharia Principles as well as carrying out other tasks related to the Compliance Function including monitoring and maintaining the Company's compliance with commitments made by the Company to the Financial Services Authority, Bank Indonesia, and other supervisory authorities. authorized.

The Company always consistently carries out the Compliance Function which is a series of actions or steps that are preventive (ex-ante). These efforts are carried out, among other things, to realize the implementation of a culture of compliance at all levels of the Company's organization and business activities; managing compliance risks; as well as ensuring the Company's compliance with the Financial Services Authority and/or other competent supervisory authorities.

Monitoring Activities and Deviation Correction Actions

1. Monitoring Activities
   a. Banks must continuously monitor the overall effectiveness of the implementation of internal control. Monitoring of the Bank's main risks must be prioritized and function as part of the Bank's daily activities, including regular evaluation, both by operational work units and internal audit work units. Banks must also monitor and evaluate the adequacy of the internal control system continuously in connection with changes in internal and external conditions and must increase the capacity of the internal control system so that its effectiveness can be increased.

b. The steps taken by the Bank in order to carry out effective monitoring activities include at least the following:
   1) Ensure that the monitoring function has been clearly defined and well structured within the Bank organization;
   2) Determine the work unit/employee assigned to monitor the effectiveness of internal control;
   3) Determine the appropriate frequency for monitoring activities based on the risks inherent in the Bank and the nature/frequency of changes occurring in operational activities;
   4) Integrate the internal control system into operational activities and provide routine reports which are then reviewed;
   5) Review documentation and evaluation results from work units/employees assigned to carry out monitoring; And
   6) Determine information or feedback in an appropriate format and frequency.

2. Improvement of Weaknesses and Correction of Deviations
   Weaknesses in internal control, whether identified by the operational work unit as a risk taking unit, risk management work unit, compliance work unit, internal audit work unit, or other parties must be immediately reported to the competent authorities. Corrective steps that must be taken include the following:
   a. Any report regarding weaknesses in internal control or ineffective risk control must be immediately followed up by authorized officials;
   b. To ensure that all weaknesses are immediately followed up, authorized officials must create a system that can track weaknesses in internal control and take corrective steps; And
   c. The results of identifying all problems in internal control must be reported to authorized officials.

Compatibility with The Committee of Sponsoring Organizations of Treadway Commission (COSO)

The Bank's internal control system is regulated under General Policy Number KU.7 dated December 30, 2022, as last amended on December 24, 2024, regarding the Internal Control System. This policy refers to the Financial Services Authority Circular Letter No. 35/SEOJK.03/2017 dated July 7, 2017, concerning Standard Guidelines for Internal Control Systems for Commercial Banks, which is also aligned with the Internal Control-Integrated Framework developed by The Committee of Sponsoring Organizations of the Treadway Commission (COSO). According to COSO, the objectives of internal control include operational objectives, reporting objectives, and compliance objectives.

In COSO it is stated that internal control is a system or process that is carried out by the Board of Commissioners, Directors, Management, and employees in a company to provide adequate guarantees for the accomplishment of control objectives. COSO – Internal Control Framework, consists of 5 (five) control components namely:

1. Environment Control, which is a fundamental component of the Internal Control System. This component reflects the nuances and atmosphere of concern for all levels of officials and leaders regarding the importance of effective internal control. This control environment is heavily influenced by the Strong Tone at the Top.
2. Risk Assessment which is a series of awareness of all employees on risk culture and activities of evaluating, assessing, and mitigating risks.
3. Control Activities which include the adequacy of policies, provisions, and procedures as well as compliance in the implementation of operational activities.
4. Information and Communication Control which is the condition of both internal and external effective communication channels in accordance with their respective responsibilities.
5. Monitoring Control, which is the process of assessing the effectiveness of the design and operation of the internal control structure and management performance monitoring activities, whether they have been carried out properly and have been corrected according to the circumstances.

Review of The Effectiveness of The Internal Control System

In 2024, the Company has implemented internal controls in accordance with control principles, and overall, the quality of the internal control system has been functioning effectively. The Bank, through the Internal Audit Division (IAD), conducts Internal Control Assessments (ICA) periodically to evaluate the effectiveness of the internal control system. This assessment measures the quality of internal control within audited work units based

on the five internal control components of the COSO Framework using the Internal Control Assessment (ICA) questionnaire rating methodology and the professional judgment of auditors through direct walkthrough testing in the field. In 2024, BTN carried out internal controls in accordance with control principles, ensuring that the internal control system operated effectively.

Broadly speaking, the steps taken by the Company in order to ensure the implementation of effective monitoring activities, included:

1. Ensuring that the Monitoring function has been clearly defined and well-structured within the Bank's organization;
2. Establishing Work Units or employees assigned to monitor the effectiveness of internal control;
3. Determining the appropriate frequency for monitoring activities based on the risks inherent in the Bank and the nature or frequency of changes that occur in operational activities;
4. Integrating the Internal Control System into Operational activities and providing routine reports such as Bookkeeping Journals, Management Reviews and Reports regarding the approval of exceptions or aberrations from established policies and procedures (justification of irregularities) which are then reviewed;
5. Reviewing the documentation and evaluation results from the Work Unit or employee assigned to carry out monitoring;
6. Establishing information or feedback in the right format and frequency.

In addition, the Company also carried out an Audit on Compliance with Legislation and Internal Control (PSA 62) to ensure the Company's compliance with legal articles, regulations, and cooperation agreements as well as internal control compliance which includes control environment, Risk Identification, control activities, information, and communication as well as monitoring. Evaluation of the effectiveness of the Company's internal control (risk control) system was carried out in all Head Office units (division/desk/Regional Office) as well as Branch Offices, both Conventional and Sharia. Everything related to internal control adequacy issues had been reported directly to the Board of Directors through the President Director and to the Board of Commissioners through the Audit Committee. Follow-up efforts had been made to minimize risks and overcome problems that arose.

Statement of The Board of Directors and/or The Board of Commissioners Regarding The Sufficiency of The Internal Control System

The Board of Directors and the Board of Commissioners are committed to ensuring that Good Corporate Governance is carried out properly as a basis for achieving goals to maintain and increase the value of the Company. One of the implementations of Good Corporate Governance is ensuring that the Internal Control System has been implemented adequately.

The Board of Directors and Board of Commissioners periodically review the results of the evaluation of the effectiveness of the Company's internal control system carried out by IAD which includes five main control components, namely the Environment Control including Management Oversight and Culture of Control, Risk Recognition and Assessment, Control Activities and Segregation of Duties of Accountancy, Information, and Communication, Monitoring Activities and Correction Deficiencies. Based on the results of the review that has been carried out, the Board of Directors and the Board of Commissioners consider that the internal control system has been implemented adequately.

This Internal Control System Standard Guide is a guideline that contains the minimum standard regarding the Internal Control System that must be enforced and applied by the Company in all aspects related to the enactment and implementation of the Company's operational activities, so as to create a common understanding and basis regarding the level of maintenance of interests and commitment from all parties related to the Bank.

Risk Management Report

In the context of implementing risk management and as a followup to the implementation of Basel II, especially pillar 1, the Bank has implemented:

1. Credit Risk Measurement by mapping credit risk exposure according to portfolio categories in the calculation of Credit Risk-Weighted Assets (ATMR) using the Standardized Approach, referring to SEOJK No. 24/SEOJK.03/2021 dated October 7, 2021, concerning the Calculation of Risk-Weighted Assets for Credit Risk using the Standardized Approach for Commercial Banks, in accordance with prevailing regulatory provisions.
2. Minimum capital requirement calculations using the Market Risk-Weighted Assets (ATMR) calculation as per SEOJK No. 23/SEOJK.03/2022 concerning the Calculation of Risk-Weighted Assets for Market Risk for Commercial Banks.
3. Calculation of minimum capital requirements using the Standard Approach Operational Risk for RWA calculation by referring to OJK Circular Letter No. 06/SEOJK.03/2020 dated April 29, 2020, and currently the Bank is recording loss data related to operational risks in accorance with Regulatory provisions.

Implementation of Bank Stress Testing focuses on 3 (three) types of risk, namely Credit Risk, Market Risk, and Liquidity Risk. As an effort to improve risk measurement, especially Credit Risk, Market Risk, and Liquidity Risk, the Bank conducts periodically stress tests on the worst-case scenario as stipulated in the bank's internal regulations with a frequency of at least once a year for credit risk and quarterly for market risk and liquidity risk. Stress testing is carried out periodically to assess capital adequacy in the event of problems that have extreme risk or are catastrophic but plausible. The Stress Testing of Market Risk and Liquidity Risk has been carried out on a quarterly basis, while the Stress Testing of Credit Risk, Market Risk, and Liquidity Risk is carried out at least once a year.

In addition, the Bank also conducts Stress Testing for the need to update Recovery Plan documents every year as part of the implementation of Basel III. 31/POJK.03/2019 dated December 2, 2019 concerning the Obligation to Fulfill Leverage Ratios for Commercial Banks, the monthly Liquidity Coverage Ratio (LCR) to regulators as stipulated in OJK Regulation No. 42/ POJK.03/2015 dated December 23, 2015 concerning the obligation to fulfill the Liquidity Coverage Ratio for Commercial Banks, Net Stable Funding Ratio (NSFR) per quarter to regulators as stipulated in OJK Regulation No. 50/POJK.03/2017 dated July 13, 2017 concerning the Obligation to Fulfill the Net Stable Funding Ratio for Commercial Banks.

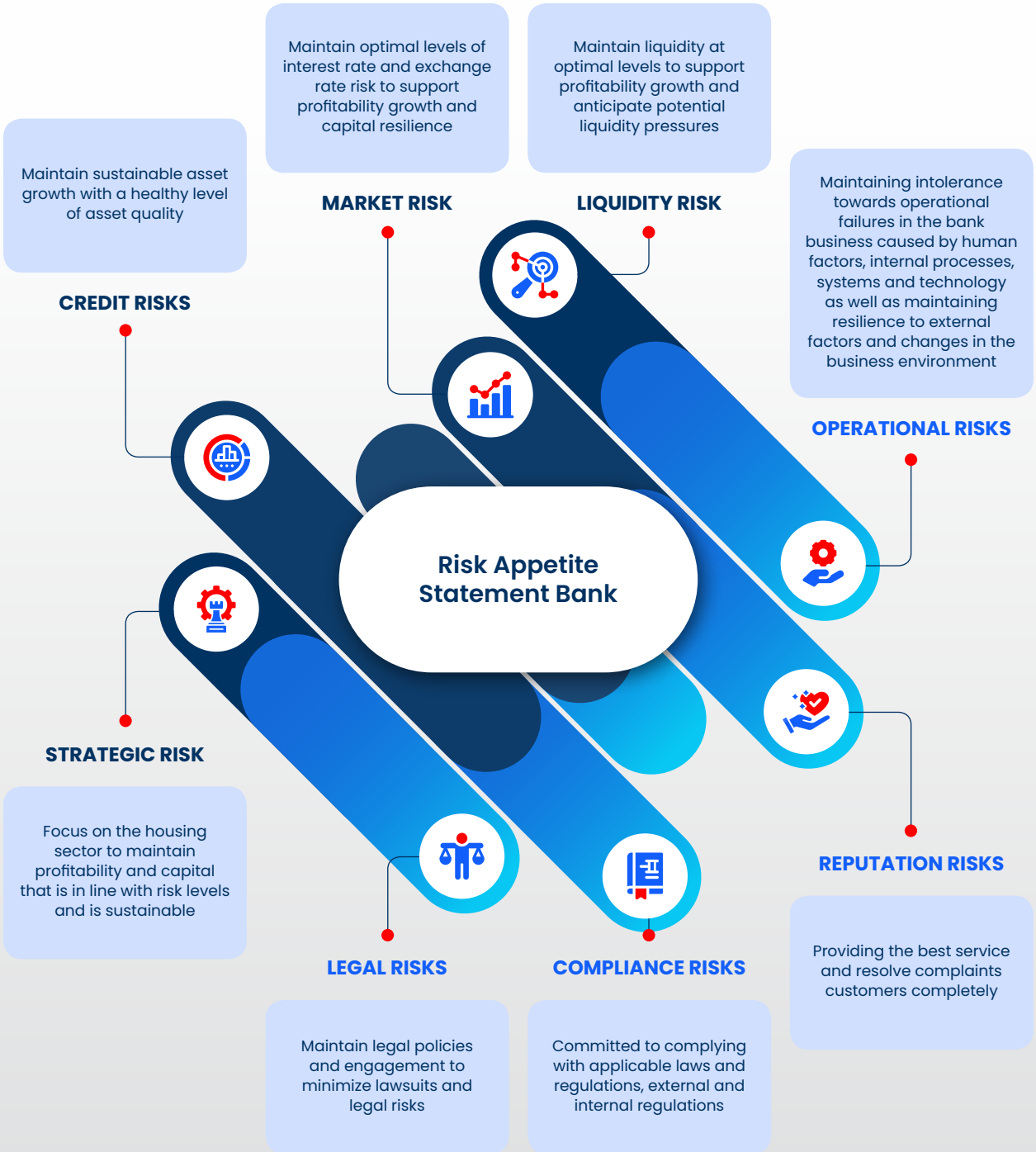
Climate Risk Stress Testing (CRST)

In line with global developments, since 2023, the Financial Services Authority (OJK) has issued guidelines for implementing Climate Risk Stress Testing (CRST) aimed at financial institutions. These guidelines aim to identify and manage risks related to climate change, including physical risks and the transition towards a low-carbon economy. In response to this policy, BTN has positively integrated the OJK CRST 2023 Guidelines into its risk management strategy. These guidelines serve as a reference for systematically assessing the potential impacts of climate change. BTN is committed to supporting the transition to a low-carbon economy by adopting a science-based approach in climate risk analysis. Climate risk testing is conducted through scenario modeling and sensitivity analysis to identify potential impacts and mitigate possible risks.

Risk Appetite Statement

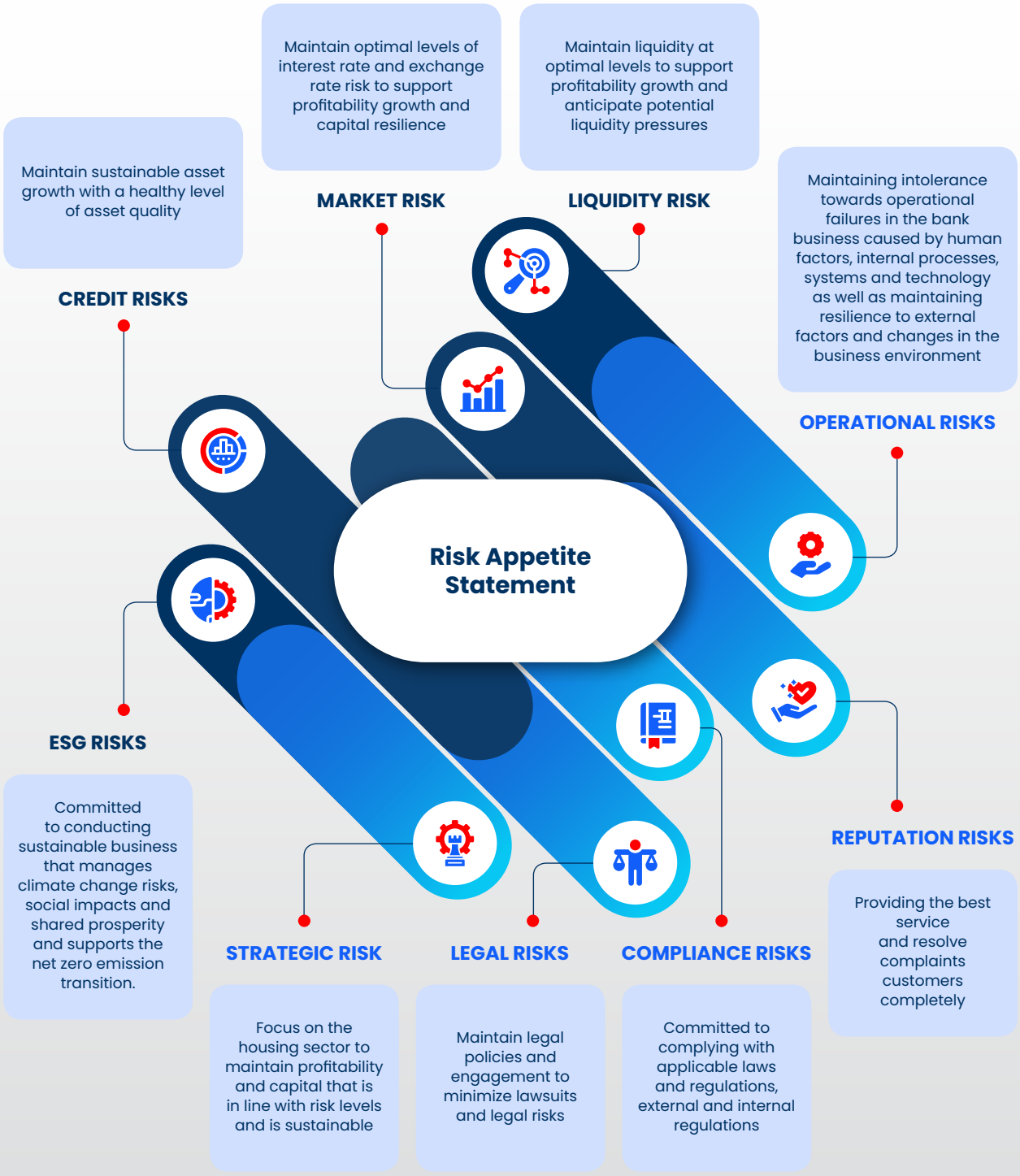
Currently, the Bank had a Risk Appetite Statement (RAS) which is a qualitative statement as well as a quantitative measure of the Bank's main risks. Disclosure of RAS was performed in writing and well documented by the Risk Management Work Unit. Determination of RAS limits is carried out by the Board of Commissioners and Directors. In determining RAS, economic, environmental and social sustainability has been taken into account which is then aligned to the preparation of the Company's Work Plan and Budget (RKAP), Risk Appetite, Risk Tolerance and Recovery Plan. The quantified risks included:

Risk Appetite Statement 2024



Risk Appetite Statement 2025

In November 2024, The Company has set a Risk Appetite Statement for 2025 with the following details:



Risk Management System

In the risk management system, the Bank carries out a risk management process that is supported by 4 pillars of risk management implementation, namely:

1. Active Supervision by the Board of Commissioners and the Board of Directors.
2. Adequacy of risk management policies and procedures and application of risk limits.
3. Adequacy of risk identification, measurement, monitoring, and control processes as well as information systems.
4. A comprehensive Risk Control System.

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Active Supervision of The Board of Commissioners and Board of Directors

In accordance with OJK regulation No. 65/POJK.03/2016 concerning the Implementation of Risk Management for Sharia Commercial Banks and Sharia Business Units, effective risk management implementation is carried out through active supervision by the Board of Directors, the Board of Commissioners, and the Sharia Supervisory Board. This supervision is supported by the Risk Management Work Unit, as illustrated in the risk management organization structure below:

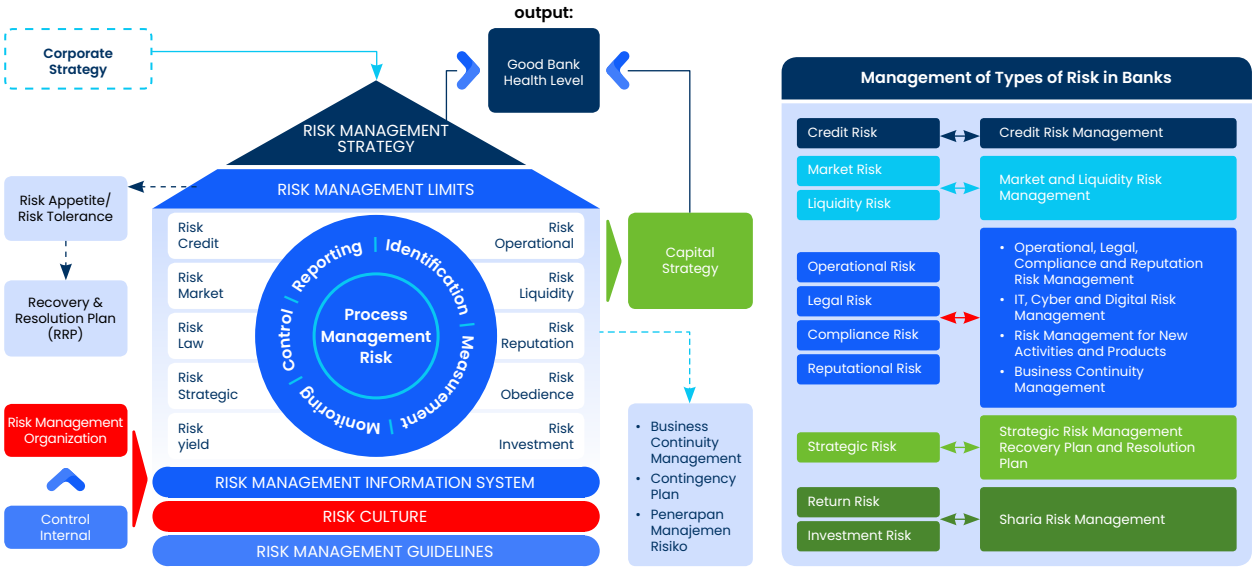


The organ of the Board of Commissioners and the Board of Directors is assisted by several committees in carrying out banking duties and activities in accordance with applicable Regulatory provisions; then, the duties are forwarded to the layers under the body of the Board of Commissioners and Board of Directors, namely the Risk Management Work Unit, Compliance Work Unit, Internal Audit Work Unit, and Policy Work Unit.

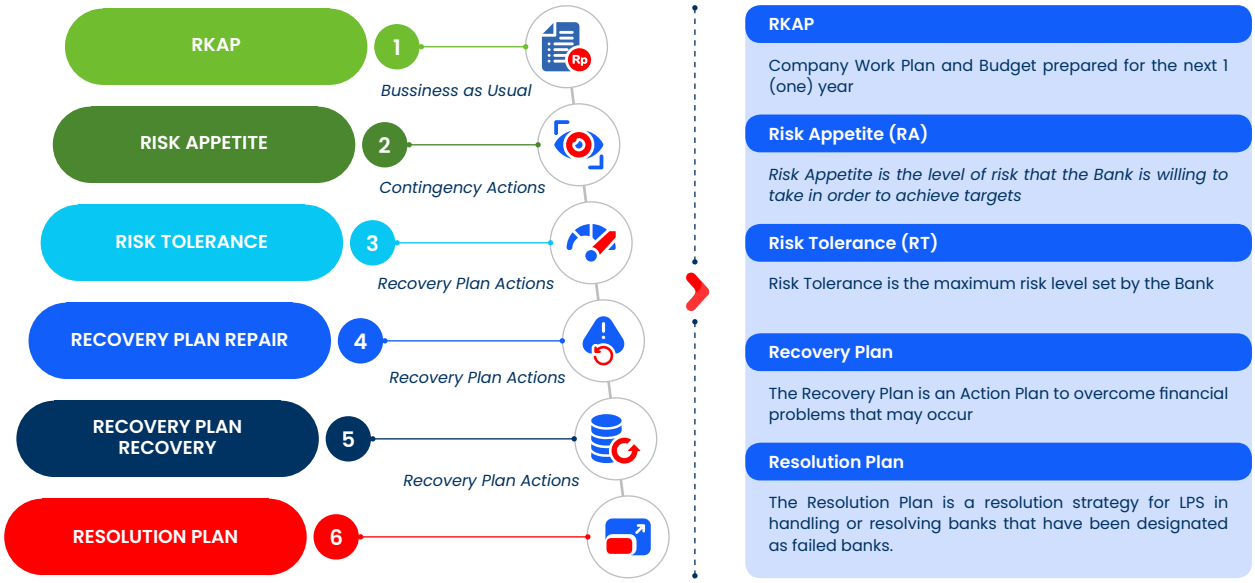
Adequacy of Risk Management Policies and Procedures and Determination of Risk Limits

In implementing healthy risk management, adequate risk management policies and procedures are required. The Company currently has a General Risk Management Policy (KUMR) as the highest policy in implementing Risk Management with a framework covering all activities in implementing the Company's Risk Management.

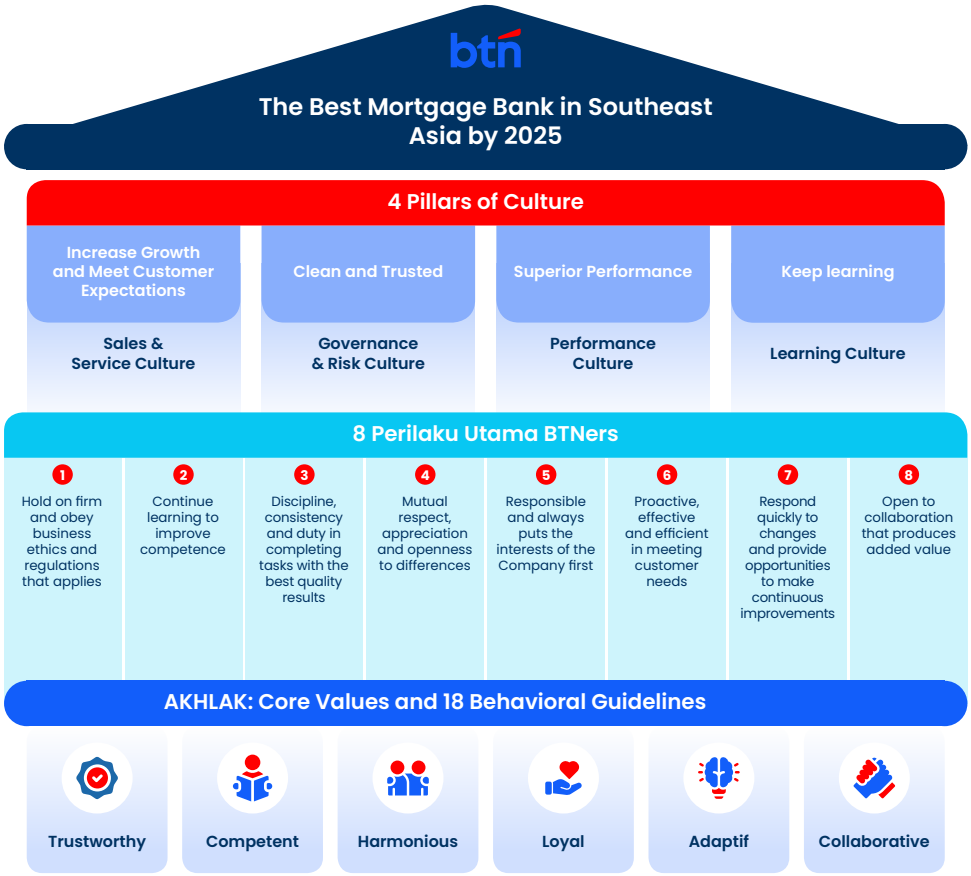
The general risk management policy mapping was illustrated starting from the risk management strategy, risk management at the Bank, and the expected output is a healthy Bank Soundness Level.



In addition to the adequacy of risk management policies and procedures, the Bank had also conducted a series of processes in setting risk limits which were formulated and elaborated by following and/or aligning with the Company's Work Plan and Budget to the Recovery Plan in accordance with applicable regulations. The illustration of setting limits is as follows:



In strengthening risk management policies and procedures, in the practice, Bank BTN also included risk management as one of the pillars of the Bank's corporate culture, where one of the pillars of corporate culture is Governance & Risk Culture. The Governance & Risk Culture pillar is an urgent and crucial pillar to be strengthened so that all business processes run prudently and comply.



AKHLAK BTN

To achieve **BTN's vision as The Best Mortgage Bank in SEA 2025.** The Best Mortgage Bank in Southeast Asia in 2025 must uphold the 4 pillars of culture in carrying out work activities in their respective Work Units.

The Governance & Risk Culture pillar is an urgent and crucial pillar to be strengthened so that all business processes run **prudent** and in **comply**.

Based on the picture above, to support Bank BTN's objectives based on the Main Values of AKHLAK and the 8 (eight) Main Behaviors of BTNers, there are four cultural pillars which are the main foundation of the 2023 – 2024 Corporate Culture Program, with the objectives namely:

1. Sales & Service Culture – Add to Grow and Meet Customer Expectation The end state achievement is increasing sales of funding, lending, and digital products and improving service quality to encourage Bank BTN's business and performance,
2. Risk & Governance Culture – Clean and Reliable Build awareness and understanding of risks and their mitigation and apply risk management principles consistently and comprehensively.
3. Performance Culture – Excellent Performance Performance improvement efforts to achieve set goals, and;
4. Learning Culture – Keep Learning Build enthusiasm for learning and improving critical competencies such as Sales, Digital Analytics, Risk & Collection competencies as well as strengthening BTNers' understanding of the importance of culture and the application of AKHLAK in everyday life.

By using these 4 pillars, the implementation of Bank BTN's corporate culture program is expected to encourage the achievement of Bank BTN's Vision.

Adequacy of Risk Identification, Measurement, Monitoring and Control Processes and Information Systems

The processes of risk identification, measurement, monitoring, and control are carried out by the Risk & ESG Management Division (ERMD) and the Operational & Digital Risk Management Division (DORD). These units identify and measure each type of risk while conducting periodic monitoring and control to mitigate significant risks to the Bank. Risk identification, measurement, monitoring, and control are key components of the risk management implementation process.

Matters that are of concern to the Company in carrying out the processes of identification, measurement, monitoring, control, and risk management information systems are as follows:

Risk Identification

Risk identification is the process of discovering, recognizing, and documenting risks. The objective of this process is to identify all types of risks inherent in each functional activity that could potentially cause losses, as well as risks associated with new products and activities within the Bank. The risk identification process involves

analyzing all sources of risk, risk events, and risk impacts on the Bank's products and activities while ensuring that risks from new products and activities have undergone an appropriate risk management process before being introduced or implemented. Additionally, the Bank conducts periodic risk identification supported by adequate methods or systems.

Risk Measurement
Risk measurement is the process used to measure the risk exposure inherent in the Bank's activities to compare it with the Bank's risk appetite, enabling the Bank to take risk mitigation actions and assess the adequacy of its capital to cover residual risks. Risk measurement is conducted periodically for products, portfolios, and all business activities of the Bank. Risk measurement methods can be quantitative and/or qualitative, using standardized methods established by Bank Indonesia and Financial Services Authority (OJK) for risk assessment and capital calculation, as well as internally developed methods tailored to business characteristics and complexity. The risk measurement system is evaluated and refined periodically or as needed to ensure the appropriateness of assumptions, accuracy, reasonableness, and data integrity, as well as the procedures used to measure risk. Stress testing complements the risk measurement system by estimating potential losses under abnormal market conditions using specific scenarios to assess the Bank's performance sensitivity to changes in risk factors and identify significant impacts on the Bank's portfolio. Stress testing is conducted regularly, with the results reviewed, and appropriate actions taken if projected conditions exceed acceptable tolerance levels. These results serve as inputs when establishing or revising policies and limits.

Risk Monitoring
Monitoring systems and procedures include monitoring the amount of risk exposure, risk tolerance, compliance with internal limits, and stress testing results, as well as implementation consistency with established policies and procedures. Monitoring results are presented in periodic reports submitted to management to mitigate risks and take necessary actions. The Company prepares an effective backup system and procedures to prevent disruptions in the risk monitoring process and periodically checks and reassesses the backup system.

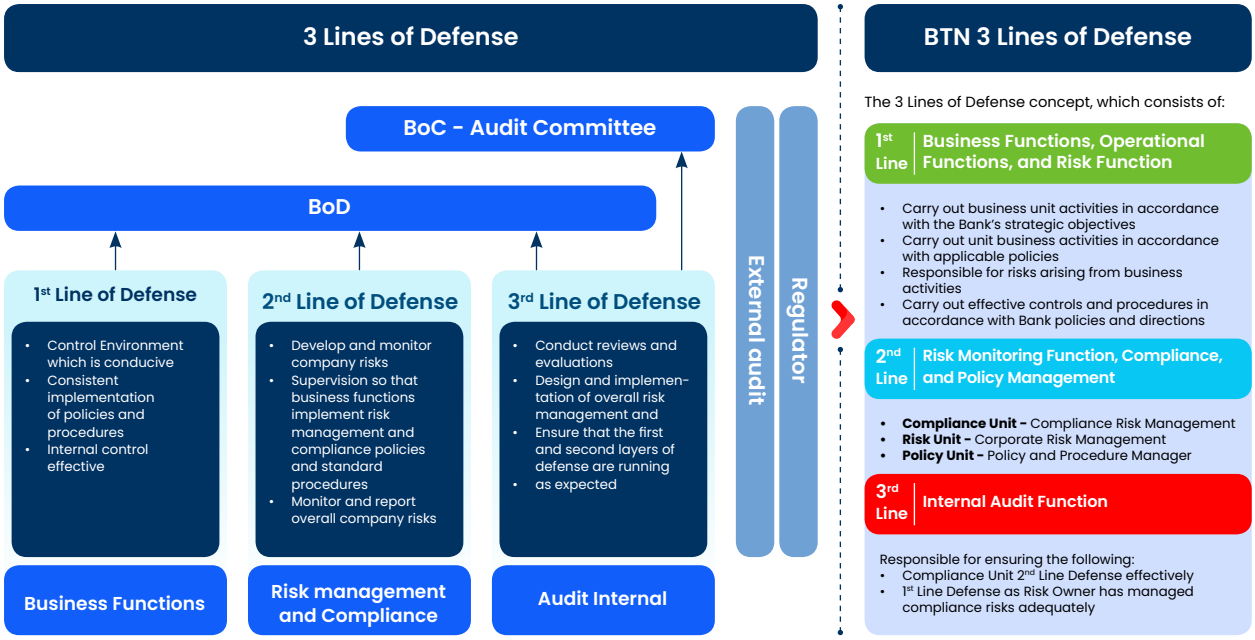
Risk Control
The Bank's risk control system adheres to established policies and procedures. The risk control process is adapted to risk exposure and the level of risk the Bank is willing to take (risk appetite) within risk tolerance limits. Risk control can be carried out through hedging mechanisms and other risk mitigation methods such as issuing guarantees, asset securitization, credit derivatives, and increasing the Bank's capital to absorb potential losses.

Risk Management Information System
The risk management information system at the Bank is managed jointly by several Divisions at the Bank. In the early stages, the focus was on collecting and improving the quality of the data and risk database, which is expected to be developed and applied to the risk management information system in stages so that the process of risk measurement and risk monitoring can be carried out in an integrated manner and can be presented in a timely manner and in accordance with regulatory provisions apply.

Internal Control System

In carrying out the process of implementing effective Risk Management, the Company completes an internal control system which aims to safeguard the Company's assets, ensure the availability of reliable financial and managerial reporting, increase compliance with statutory provisions and regulations, and reduce the risk of losses, deviations and violations. Prudential aspects The Company has periodically reviewed the effectiveness of its internal control procedures and risk management framework.

The employment of a reliable and effective internal control system is the responsibility of all operational work units and supporting work units as well as the Internal Audit Work Unit, the process of which is described as follows:



Types of Risks and Their Management

In implementing risk management, the types of risks managed by the Bank included:

Credit Risk

Credit Risk is the risk of loss due to the failure of other parties to fulfill their obligations. Included in Credit Risk are the Credit Risk due to debtor failure, the Credit Risk due to the concentrated provision of funds (Credit Concentration Risk), the Credit Risk due to counterparty credit risk, the Credit Risk due to settlement failure (settlement risk), and the Credit Risk due to country risk.

Credit Risk can originate from various Bank business activities. In most banks, lending is the largest source of credit risk. In addition to credit, the Bank faces Credit Risk from various financial instruments such as securities, acceptances, interbank transactions, trade financing transactions, exchange rate transactions, and derivatives as well as commitments and contingencies.

Credit Risk Management

As part of credit risk management, the Bank regularly reviews and updates its Credit and Financing Policy Guidelines for bank credit and financing as part of the risk assessment process. Credit Risk Exposure is monitored from the credit granting process until maturity. Credit risk monitoring and control include evaluating credit risk exposure against credit risk limits (Risk Appetite and Risk Tolerance).

The Bank's credit and financing management is directed towards credit and financing expansion while ensuring the quality of each credit and financing facility from the time it is granted until it is fully repaid by the debtor, preventing them from becoming non-performing loans. Effective credit management can minimize losses and optimize the use of capital allocated for credit risk.

The Bank actively conducts the SME and Commercial Credit Portfolio Quality Review Forum together with the Board of Directors, Divisions, CBC, and Branch Offices on a monthly basis or as requested, providing an up-to-date overview of credit positions and quality at both the bank-wide and segmented levels. To improve the credit decision-making process, the Bank has also established a credit committee through Credit Committee Meetings, accompanied by a centralized credit process. For commercial credit, the Bank has implemented the Commercial Banking Center (CBC), which serves as a centralized commercial credit processing unit. In the SME segment, the Bank is also implementing SPU (SME Processing Center) as an initiative to improve the SME credit process and management, enhance productivity, improve centralized and objective credit decision-making, and enable centralized monitoring. The Bank has also started applying Portfolio Guidelines for Wholesale Credit and is developing Portfolio Guidelines for the SME Credit and Sharia Financing segments to manage credit/financing concentration risk while maintaining prudence and governance principles. The

Bank is developing several system models related to credit risk management, such as the SME Credit Scoring Model for the SME segment, and the Early Warning System (EWS) for the SME, Commercial, and Corporate Credit segments, which can predict debtor conditions up to 12 months in advance. IT development is currently underway to integrate these systems into BTN's overall system.

For consumer loan, the process of controlling credit risk is carried out through the Consumer iLoan system which is equipped with a Credit Scoring Model (CSM) which is currently being developed at CSM Bank. The management of Col-2 and NPL consumer credit debtors is carried out by the Consumer Collection, Recovery & Asset Sales Work Unit while for commercial credit is carried out by the Commercial Asset Management Work Unit.

As a follow-up to the implementation of Pillar 1 of Basel II, in 2023, the Bank implemented credit risk measurement by using Standardized Approach OJK Circular Letter No. 24/ SEOJK.03/2021 dated October 7, 2021 concerning Calculation of Risk-Weighted Assets (RWA) for Credit Risk using the Standard Approach for Commercial Banks.

In order to manage credit risk, the Bank has applied the Four Eyes Principle by segregating credit risk functions and business units. Commercial credit decisions consist of Commercial Risk and Business Units as Risk Taking Units and first line as well as consumer credit decisions consisting of the Retail Risk Division (Regional Loan Processing Center) and Branch Offices and Regional Offices.

To strengthen financing risk management and control the composition of the Bank's credit portfolio while ensuring healthy credit portfolio growth, BTN manages credit risk through Portfolio Guidelines to mitigate concentration risk. These Portfolio Guidelines serve as a strategic initiative in the Bank's financing activities, always considering the latest macroeconomic conditions, particularly in sectors deemed viable for financing, including priority sectors. The guidelines also include sectoral NPL/NPF analysis and monitoring, sectoral credit limits, and sectoral industry prospects to support the Bank's business development while incorporating ESG considerations.

Market Risk

Market Risk is the risk on balance sheet positions and administrative accounts, including derivative transactions, due to overall changes in market conditions, including the risk of changes in option prices. Market Risk includes among others interest rate risk, exchange rate risk, equity risk, and commodity risk which can be detrimental to the Bank. Market risk can originate from either the trading book position or the banking book position.

Market Risk Management

BTN identifies, measures, monitors, and controls market risk through the business units and/or Enterprise & ESG Risk Management Division. One of the key processes in market risk identification includes assessing each product or activity categorized as a new product or activity. For market risk management, BTN has established the Assets and Liabilities Committee (ALCO), which periodically reviews interest rate risks and market risk management, particularly those derived from banking book positions.

To measure interest rate risk in both trading book and banking book positions, BTN conducts sensitivity analysis to assess the impact of market interest rate changes on the Bank's profit (loss) and equity. Additionally, to measure foreign exchange risk, BTN performs sensitivity analysis to evaluate the impact of currency exchange rate fluctuations on BTN's profit (loss). Specifically, for the banking book position, BTN measures interest rate risk using the repricing gap method, as outlined in Technical Guidelines No. PT.8-F.1 dated May 24, 2023, regarding the Implementation of Interest Rate Risk Management in the Banking Book (IRRBB). In compliance with OJK Circular Letter No. 12/SEOJK.03/2018 dated August 21, 2018, concerning the Implementation of Risk Management and the Standardized Approach to Measuring Interest Rate Risk in the Banking Book (IRRBB) for Commercial Banks, BTN has adjusted its IRRBB policy and reporting in accordance with applicable regulations.

As an effort to complement market risk measurement using standard methods and sensitivity analysis, the Bank conducted stress testing to assess the Bank's resilience in facing extreme changes in interest rates and exchange rates, with scenarios referring to regulatory provisions and the bank's internal scenarios. For internal Bank scenarios, at the beginning of each year, the Enterprise Risk Management Division coordinates with

the Stress Testing Working Group (relevant Division) to formulate scenarios and assumptions to be used in implementing Market Risk Stress Testing for the next 1 (one) year.

Market risk monitoring and control includes evaluating market risk exposure to the Bank's internal limits (Risk Appetite & Risk Tolerance) that have been set and reviewed periodically to conform to the Bank's conditions. In addition, in order to control or limit exchange rate risk exposure, the Bank had set limits which include treasury transaction limits, dealer limits, budget loss limits, stop loss/stop gain limits, as well as Net Open Position (NOP) limits that are in accordance with the maximum limits stipulated in Bank Indonesia Regulation No. 17/5/PBI/2015 dated May 29, 2015 concerning the Fourth Amendment to PBI Number 5/13/ PBI/2003 concerning the Net Open Position of Commercial Banks. The Bank had a Market Middle Office unit in the Risk Management Work Unit in carrying out market risk monitoring and control, including monitoring of predetermined limits.

The Bank has implemented SEOJK No. 23/SEOJK.03/2022 dated December 7, 2022, regarding the Calculation of Risk-Weighted Assets for Market Risk for Commercial Banks since January 2024.

For the implementation of Basel II, especially Pillar 2, the Bank submitted a report on the implementation of risk management for the Interest Rate in the Banking Book (IRRBB) and a report on IRRBB calculations to the regulator on a quarterly basis in accordance with OJK Circular Letter No. 12/SEOJK.03/2018 dated August 21, 2018 concerning Implementation of Risk Management and Standard Approach Risk Measurement for Interest Rate Risk in the Banking Book (Interest Rate Risk in The Banking Book) for Commercial Banks.

For Basel III implementation, the Bank:
1. Submits monthly Liquidity Coverage Ratio (LCR) reports to regulators online via the OJK Online Reporting Application (APOLO) and publishes them quarterly on the Bank's website in accordance with OJK Regulation No. 19/2024 dated November 8, 2024, on the Liquidity Coverage Ratio (LCR) Requirement for Commercial Banks.
2. Submits quarterly Net Stable Funding Ratio (NSFR) reports to regulators online via the OJK Online Reporting Application (APOLO) and publishes them on the Bank's website in accordance with OJK Regulation No. 20/2024 dated November 8, 2024, on the Net Stable Funding Ratio (NSFR) Requirement for Commercial Banks.

Liquidity Risk

Liquidity Risk is the Risk resulting from the Bank's inability to meet its maturing obligations from cash flow funding sources and/or from high-quality liquid assets that can be pledged as collateral, without disrupting the Bank's activities and financial condition.

The inability to obtain cash flow funding sources causing Liquidity Risk may be caused among others by:
1. Inability to generate cash flow from productive assets or from the sale of assets, including liquid assets; and/or
2. Inability to generate cash flow originating from fundraising, inter-bank transactions, and loans received.

Liquidity Risk Management

As a guideline for managing liquidity risk, the Bank has Liquidity Risk Management Policy Guidelines, which are part of the Bank's Risk Management Policy Guidelines. The Liquidity Risk Management Policy Guidelines regulate, among other things, the active oversight of the Board of Commissioners and the Board of Directors in applying liquidity risk management, the liquidity risk management process, as well as policies, procedures, and setting liquidity risk limits. The Bank has an Assets and Liabilities Committee (ALCO) responsible for liquidity management and periodically reviewing liquidity risk management within the Bank.

Referring to the Liquidity Risk Management Policy Guidelines, the Bank identifies, measures, monitors, and controls liquidity risk. Identification of liquidity risk is basically aimed at knowing the amount and trend of liquidity needs as well as available funding sources to meet those needs.

Measurement of liquidity risk in the Bank is carried out by the Treasury Work Unit and the Risk Management Work Unit. When measuring liquidity risk, the Company refers to Technical Instructions No. PT.8-F.4 , concerning Implementation of Liquidity Risk Management. Liquidity Risk measurement uses 4 (four) methods, namely stock-based, maturity profile analysis, cash flow projections, and stress testing. The stock-based method is used to measure liquidity risk at the Bank using liquidity ratios, the maturity profile analysis method is used to measure liquidity gaps and cash flow projections are used to measure the amount and trend of liquidity needs. The Bank carries out stress testing using Bank Specific Crisis (BSC) scenarios and General Market Crisis (GMC) stress testing, the aim of which is to measure the adequacy

of available liquid assets and the Bank's ability to meet liquidity needs in crisis conditions. s. The Enterprise Risk Management Division in coordination with the Stress Testing Working Group (related Division) formulates the risk impact on scenarios and assumptions that will be used in implementing Liquidity Risk Stress Testing for the next 1 (one) year.

In order to maintain the availability and adequacy of liquid assets and to control or limit exposure so as not to be affected by liquidity risk, the Bank regularly monitors liquidity risk on a daily, weekly, monthly, and quarterly basis. Liquidity risk monitoring by the Risk Management Work Unit is submitted to the Board of Directors and strategy evaluation is submitted to the relevant Division.

Monitoring and controlling liquidity risk include evaluating liquidity risk exposure to the Bank's internal limits (Risk Appetite & Risk Tolerance) and predetermined Recovery Plan trigger levels. These limits are reviewed periodically so that they are in line with the Bank's conditions. In addition, the Bank monitors the Early Warning Indicator (EWI) and reports it regularly to the Board of Directors and related Work Units.

In accordance with OJK Regulation No. 5 of 2024 dated March 27, 2024, regarding the Determination of Supervision Status and Handling of Issues in Commercial Banks, BTN has been monitoring liquidity indicators, including the Liquidity Coverage Ratio (LCR) and Net Stable Funding Ratio (NSFR) as mandated by OJK Regulation No. 19 of 2024 dated November 8, 2024, on the Requirement for Liquidity Coverage Ratio Compliance for Commercial Banks and OJK Regulation No. 20 of 2024 dated November 8, 2024, on the Requirement for Net Stable Funding Ratio Compliance for Commercial Banks.

Operational Risk

Operational Risk is the Risk resulting from inadequate and/ or non-functioning internal processes, human errors, system failures, and/or external events that affect the Bank's operations. Operational Risk can originate from HR, internal processes, systems, and infrastructure, as well as external events.

These sources of risk can cause events that have a negative impact on the Bank's operations so the emergence of these types of Operational Risk events is a measure of the success or failure of Risk Management for Operational Risk. Operational risk events can be classified into several types, including internal fraud, external fraud, employment practices and workplace safety, customer-related issues, product and business practices, physical asset damage, business disruptions and system failures, as well as process and execution errors. This also includes fraud arising from money laundering and terrorist financing activities. Additionally, IT, Digital, and Cyber risks are also encompassed within operational risk.

Operational Risk Management

To implement operational risk management, the Bank has developed the Operational Risk Management Information System (ORMIS), an integrated system with multiple operational risk management tools such as RCSA, LED, and KRI for each work unit. This system has already been implemented at regional offices and branch offices.

RCSA is used to carry out the process of identifying and measuring operational risks inherent in all Bank work units. In completing the RCSA, all work units are required to be able to identify and measure operational risks that are inherent in daily activities and have an impact on achieving the work unit's targets.

LED functions as operational risk data collection for operational risk events in Branch Offices based on 7 (seven) types of risk events in accordance with Basel II provisions. Work Units can send data on losses due to operational risks (loss events) online whenever there is a risk event in their Work Units. The output from this LED is data on accumulated bank losses in one month in the form of actual loss, near miss, and potential loss for each risk event. The results of the collected data will be processed and analyzed so that operational risk exposure maps for each work unit can be identified. This exposure map become a reference in mitigating the occurrence of similar incidents by improving business processes or adding other forms of risk mitigation.

KRI is a dashboard for monitoring risk trends based on indicators. KRI can be used to detect predictive or lagging risks as input for preventive or corrective action.

The Bank implemented a Business Continuity Management (BCM) policy to ensure the continuity of the Bank's operations in running the business after being affected by operational risks originating from external factors such as natural disasters, social conflicts, and IT system failures. The BCM policy contains systematic steps and guides employees in dealing with emergencies, starting from pre-disaster preparedness,

disaster response, and operational continuity plans to return to normal conditions. In supporting the successful implementation of BCM, the Bank carried out several activities including:

1. Updating internal regulations related to Business Continuity Management (BCM) on a regular basis which clearly defines the roles and responsibilities of each Work Unit.
2. The process of internalizing all employees by compiling socialization materials and conducting quizzes that are included in the Risk Awareness culture program
3. Conducting an assessment of the availability of Working Remote Areas (WRA) by involving critical work units, so that the WRA owned by the Bank has an adequate level of readiness to support operational activities when a disaster occurs.

As digital banking services expand and cybersecurity concerns grow, the Bank continues to strengthen its IT risk management system to anticipate potential IT, Digital, and Cyber threats that may arise due to digital transformation. This is achieved through the development of Digital Risk Management governance under the supervision of DORD.

To enhance monitoring functions and operational risk control across branch offices, regional offices, Central Business Commercial (CBC), and the Regional Loan Processing Center (RLPC), the Bank has deployed Business Branch Control (BBC), Regional Business Control (RBC), CBC Business Control (CBC-BC), and RLPC Business Control (RLPC-BC) officers. These officers serve as a 1.5-line of defense, coordinating with the Digital & Operational Risk Management Unit. For operational risk oversight and mitigation at the head office, the Bank has established an Operational Risk Control (ORC) unit under the supervision of DORD.

As part of the Bank's internal control system to foster a fraud-risk-aware culture across all organizational levels, the Bank has implemented a Special Policy related to Fraud Risk Management Procedures and has established a Fraud Risk Management Department under the supervision of DORD.

In addition, in order to anticipate operational risks and ensure that Information Technology (IT) is implemented effectively and efficiently in accordance with applicable provisions, periodic active supervision of Information Technology (IT) has been carried out by the Board of Directors through the Information Technology Steering Committee forum.

Legal Risk

Legal Risk is the Risk resulting from lawsuits and/or weaknesses in juridical aspects. Legal risk can originate, among others, from weaknesses in the juridical aspect caused by weak agreements made by the Bank, the absence and/or changes in laws and regulations that cause a transaction that has been carried out by the Bank to be not in accordance with the provisions, and litigation processes whether arising from third party lawsuit against the Bank or the Bank against a third party.

Legal Risk Management

Legal Risk Identification is carried out on the factors that cause risk including the existence of lawsuits and weaknesses in the juridical aspects inherent in functional activities of credit (provision of funds), treasury and investment, operations and services, information system technology and MIS, and human resource management.

Measurement of Legal Risk is carried out by the Risk Management Work Unit in coordination with the Legal Work Unit and the Credit Operational Work Unit. . Legal risk measurement is carried out by the Risk Management Unit in coordination with the Legal Unit and the Credit Operations Unit. The Legal Unit provides individual case evaluations on contingent liabilities arising from ongoing litigation, while the Credit Operations Unit assesses the quality of credit agreement documentation (LAT). Parameters used for measuring legal risk include potential losses due to lawsuits, contractual weaknesses arising from invalid agreements, and regulatory changes that could render the Bank's products non-compliant with existing regulations.

Legal Risk Monitoring is carried out by the Risk Management Work Unit by evaluating the effectiveness of the implementation of policies, procedures and compliance with policies, legal regulations and Bank

limit provisions. Monitoring is carried out periodically for all Legal Risk positions. In carrying out Legal Risk control, the Legal Work Unit provides legal input and recommendations to each division and work unit and conducts periodic reviews of cooperation agreements and contracts with counterparties. In addition, the Bank has a Legal Application System (LApS) application which is designed in the form of a website and is used as a register and monitoring of legal cases that occur or are handled by the Bank, both criminal and noncriminal, so that every case that is happening, both at the branch and progress can be monitored at the Head Office.

The Bank has assigned personnel as Branch Legal Representatives (BLR) at branch offices, who are responsible for various legal functions, including:

1. Provide legal assistance for litigation issues submitted by each work unit in the context of implementing Bank operations and provide legal assistance in every legal case.
2. Represent the Bank in carrying out proceedings in the Court, Police, Prosecutor's Office, other legal institutions, and outside the court in its work area.
3. Provide legal opinions on legal issues submitted by Regional Offices, Branch Offices, and Sharia Branch Offices related to operations in their work areas.
4. Provide legal consultations on legal issues submitted by Branch Offices and Sharia Branch Offices.
5. Perform legal watch functions in accordance with Regulatory provisions.
6. Manage and control legal risks within the scope of work.

Strategic Risk

Strategic Risk is the risk due to inaccuracy in making and/or implementing a strategic decision and failure to anticipate changes in the business environment Strategic risk arises due to the Bank's failure to align its strategy with its vision and mission, conducting incomplete strategic environmental analysis, and/or inconsistencies in strategic planning across different levels. Strategic risk also emerges from the Bank's inability to anticipate changes in the business environment, including technological advancements, macroeconomic conditions, market competition dynamics, and regulatory changes from the government, Bank Indonesia, the Financial Services Authority (OJK), and other relevant authorities.

Strategic Risk Management

Strategic Risk identification is carried out based on Strategic Risk factors in certain functional activities, such as credit, treasury, and investment activities as well as operations and services through a business plan prepared by the Corporate Strategy & Planning Work Unit as an elaboration of General Policies stipulated by the Board of Directors.

Strategic Risk measurement is carried out based on the achievement of the Bank's performance by comparing actual results with predetermined targets. Strategic Risk Monitoring is carried out by the Corporate Strategy & Planning Work Unit on a regular basis by monitoring the achievement of Key Performance Indicators (KPI) and the Risk Management Work Unit which monitors risk exposure compared to the Bank's risk appetite and monitors Risk Appetite and Risk Tolerance of the Strategic Risk on a monthly basis. Then, the Board of Commissioners, Directors, and Work Units review the basic strategy with a focus on business transformation, infrastructure, and Human Resources as well as Review Risk Appetite and Risk Tolerance regularly and at least once a year.

Furthermore, the Risk Management Work Unit monitors Strategic Risk by comparing expected results with actual results, evaluating work unit performance, and ensuring target achievement. In controlling Strategic Risk, the Corporate Strategy & Planning Work Unit functions to analyze gaps between actual reports and business plan targets and submit corrective steps that must be taken to the Board of Directors on a regular basis.

Compliance Risk

Compliance Risk is the risk caused by the Bank for not complying with and/or not implementing the applicable laws and regulations, such as credit risk related to the Minimum Capital Requirement (KPMM), Earning Asset Quality, Establishment of CKPN, Legal Lending Limit (BMPK), market risk related to the provisions of the Net Open Position (NOP), strategic risk related to the provisions of the Annual Work Budget Plan (RKAT), and other risks related to certain provisions. Compliance risk can also originate, among other things, from legal behavior, namely behavior or activities of the Bank that deviate from or violate the provisions and/or laws and regulations, and organizational behavior, namely behavior or activities of the Bank that deviate or conflict with generally accepted standards.

Compliance Risk Management

The management of the Bank's compliance risk is carried out by the Risk Management Work Unit in coordination with the Compliance and Governance Division/CMGD. The Compliance Work Unit monitors the Bank's report submission obligations to external parties and reviews internal regulations periodically and continuously so that they remain relevant to applicable external regulations. The Bank has an internal application, namely the

Regulatory Compliance & Monitoring System (CRMS), to make it easier for all BTN employees to access all external regulations and to function as a reminder to work units on the obligation to submit reports to Regulators. To minimize the potential for compliance risk, the Bank placed Regional Compliance Supervisory Officers (RCSO) in Regional Offices to evaluate the compliance level of Branch Offices in carrying out operational activities. Along with the enactment of the Personal Data Protection Act, the Compliance Work Unit formed a Data Privacy sub-unit, and a gap analysis on the readiness of the Bank in implementing the said provisions had been carried out. The Compliance Work Unit monitors and reports compliance risk that occurs to the Bank's Directors on a regular basis. Compliance Risk measurement is carried out on potential losses caused by non-compliance and the Bank's inability to comply with applicable external regulations. The indicators/ parameters used in measuring Compliance Risk include the type, the significance, and the frequency of violations against applicable regulations or the track record of bank compliance, the behavior underlying the violation, and violations of generally accepted standards.

In order to control Compliance Risk, the Risk Management Work Unit and the Compliance Work Unit were assigned with evaluating the effectiveness of the implementation of Compliance Risk management by periodically monitoring all types of activities that have the potential to cause Compliance Risk.

Reputation Risk

Reputation Risk is the Risk resulting from a decrease in the stakeholder trust level originating from a negative perception of the Bank. Reputation Risk can originate from various Bank business activities as follows:

1. Events that have damaged the Bank's reputation, for example, the influence of the reputation of the owner of the Bank and related companies, product complexity and Bank business cooperation, negative publicity about the Bank, violations of business ethics, and customer complaints.
2. Other matters that may lead to Reputation Risk, for example, weaknesses in governance, corporate culture, and business practices of the Bank.

Reputation Risk Management

All employees, including business unit management and Bank supporting activities, are part of the Risk Management implementation for Reputation Risk, considering that reputation is the resul of all of the Bank's business activities. The role of the Business Unit Management is to identify the Reputation Risk that occurs in the business activity and/or activities of the unit and as a front liner in developing and preventing Reputation Risk, scpecifically related to customer relationshops. Reputation Risk identification is conducted on risk factors inherent in certain functional activities, such as credit provision (provision of funds), fund raising, treasury and investment, operations and services, information technology systems and MIS, and Human Capital.

As part of the reputation risk identification process, BTN has implemented the SPN (Customer Complaint System) application and conducts monitoring of all mass media (both print and electronic, at local and national levels). The Bank records all news reports related to the Bank, whether direct (straight news) or indirect (mentions). The SPN application is integrated with Branch Offices and the Contact Center. The Customer Complaint Management Unit, as the administrator of SPN, follows up on customer complaints and resolves them in accordance with the established Service Level Agreement (SLA).

The Reputation Risk Measurement is performed according to the results of an assessment of the factors affecting the Company's reputation, including customer complaints and reporting about the Company. The Bank's Reputation Risk is managed by the Corporate Secretary Division (CSD) work unit that manages news about the Company which is published in the print and electronic mass media and the Service Quality & Network Division (SQND) who manages complaints from the customer.

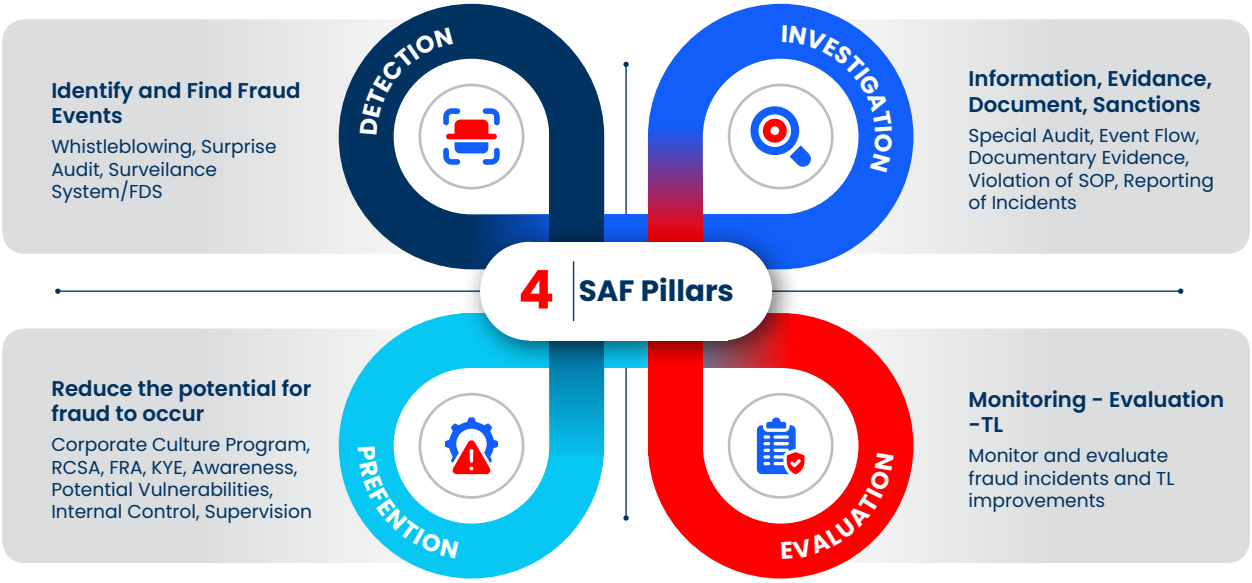
In order to monitor Reputation Risk and ensure customer satisfaction, the Company's SPN (Customer Complaints System) functions to support the management of services and online customer complaint handling between parties regarding problems in Branch Offices and Headquarters. Reputation Risk monitoring is also conducted by the Enterprise Risk Management Division (ERMD) by reminding and providing recommendations for improvement to the Reputation Risk Management Division of CSD and SQND according to the assessment of reputation risk profile parameters.

Strengthening the Implementation of risk Culture

Strengthening the implementation of risk culture as part of maintaining commitment and ensuring that the risk culture policy is understood and implemented by all management and employes of the Bank, so the risk culture implementation strategy must be in line with the Bank's risk management implementation strategy. The Bank determines a risk culture implementation roadmap per year according to the level maturity to be achieved, monitoring the implementation of risk culture by measuring the maturity level of risk culture at least

once a year by the internal team and once every three years by an independent team (external party). The Bank reviews its risk culture policy at least once a year. Several programs for implementing and improving the Bank's risk culture are:

1. The Risk Economic Outlook is an annual routine agenda which discusses strategies for determining risk appetite and risk tolerance. This forum aims to provide an understanding of risk awareness to the Board of Commissioners and Directors so that they can make the right strategic decisions.
2. The Bank actively conducts Portfolio Quality Review Forums attended by Directors, Divisions, CBC, Branch Offices as an effort to provide the latest picture of credit position and quality both bankwide and per credit segmentation.
3. Conduct visits and awareness in the context of implementing data cleansing to improve the quality of the loss event database at Bank BTN.
4. Fostering a culture of compliance, this activity is carried out with an approach through the implementation of each business process which must always be guided by applicable internal and external rules and regulations as well as SOPs.
5. Implementing continuous prevention so that there are no significant weaknesses in the first line defense process and making corrective action plans in coordination between the Risk Management Work Unit and the Internal Audit Work Unit.
6. Strengthening operational risk control through various activities such as seminars, workshops, and risk outlook sessions.
7. Internalizing risk management culture through socialization, training, and e-learning on risk culture for all employees via BTNbest, with comprehension levels measured through quizzes.
8. The Bank has an operational risk control system throughout the Bank's network. The Bank has implemented awareness regarding the use of the ORMIS application as a form of implementing risk management throughout the branch office network.
9. To enhance risk awareness among Human Resources (HR), the bank organizes an annual Culture Day event by inviting external speakers. The Culture Day event aims to promote a risk-aware culture as an integral part of operational and business processes, as well as to instill a value-driven orientation of the risk management function towards business goals.
10. Carrying out risk awareness of potential fraud vulnerabilities through Fraud Risk Assessment (FRA) within the scope of all Work Units. The FRA method is carried out based on OJK Circular Letter No. 39/POJK.03/2019 concerning Implementation of Anti-Fraud Strategy which is described as follows:



Risk Assessment

In accordance with the Regulation of OJK Regulation No. 18/POJK.03/2016 dated March 16, 2016, concerning the Implementation of Risk Management for Commercial Banks and Circular Letter of OJK Circular Letter No. 34/SEOJK.03/2016 dated September 01, 2016 concerning the Implementation of Risk Management for Commercial Banks, Risk Management Division shall report the risk profile to OJK quarterly containing information about Credit Risk Exposure, Market Risk, Liquidity Risk, Operational Risk, Compliance Risk, Strategic Risk, Legal Risk, and Reputation Risk. The assessment of the risk profile covers the assessment of the Inherent Risk and the Quality Rating on the Implementation of Risk Management in Bank's operational activities.

Taking into account the results of self-assessment, the Company strives to maintain the Risk Profile Quarter IV 2023 to be in Low to Moderate level. The probable loss encountered by the Bank in terms of the Inherent Risk is considered low (Low to Moderate), with a Satisfactory rating for the Quality Rating on the Implementation of Risk Management. Details are listed as follows:

Types of Risk	Inherent Risk Rating	Quality Rating on the Implementation of Risk Management	Risk Rating
Credit Risk	Moderate	Satisfactory	Low to Moderate
Market Risk	Moderate	Satisfactory	Low to Moderate
Liquidity Risk	Low to Moderate	Satisfactory	Low to Moderate
Operational Risk	Moderate	Satisfactory	Low to Moderate
Legal Risk	Low to Moderate	Satisfactory	Low to Moderate
Strategic Risk	Low to Moderate	Satisfactory	Low to Moderate
Compliance Risk	Low to Moderate	Satisfactory	Low to Moderate
Reputational Risk	Low to Moderate	Satisfactory	Low to Moderate

Review of The Effective Risk Management System of Issuer or Public Company

The risk profile assessment for both Conventional and Sharia banking at BTN is conducted periodically. Throughout 2024, the assessment reflects that the risks faced by BTN (both conventional and sharia) have been effectively managed, supporting further business development. In other words, risk management at BTN has been implemented efficiently and effectively. An external evaluation of BTN's Risk Management effectiveness, conducted by an independent consultant through the Risk Maturity Index (RMI), placed BTN in the "good practice" phase. This classification meets the criteria set by the Ministry of State-Owned Enterprises (BUMN) under Regulation No. SK-8/DKU.MBU/12/2023, which provides technical guidance on risk maturity index assessment within state-owned enterprises (BUMN). Throughout 2024, improvements have been made to risk management implementation based on recommendations from the independent Risk Maturity Index (RMI) assessment. These enhancements aim to standardize risk management practices across all work units, integrating them into BTN's processes and corporate culture.

Statements of the Board of Directors and/or the Board of Commissioners or Audit Committee to Risk Management System Adequacy

The Company's risk management is based on good corporate governance with the involvement of all organs of the Company in managing risk management. This can be seen from the organizational structure of the Company's risk management. The Board of Commissioners through the Risk Monitoring Committee meeting and the Board of Directors through the Risk Management Committee meeting are responsible for periodically ensuring that the implementation of Risk Management has been effective and adequate in accordance with the characteristics, complexity and risk profile of the Company, which is reflected in the effectiveness of the implementation of internal control functions, including internal audit, risk management, compliance, financial and operational control functions. Based on the results of the review conducted in 2024, the Board of Directors and the Board of Commissioners assessed that the risk management system had been implemented adequately.

The Board of Commissioners and the Board of Directors are actively participating in mitigating the Company's risks by monitoring Risk Management Implementation Quality, which includes risk governance, risk management framework, risk management process, adequacy of risk management information system and human resources, as well as the adequacy of the internal control system. The adequacy of the Bank's Risk Management System is supported by:

Risk Monitoring Committee

The Risk Monitoring Committee has the duty and responsibility of providing recommendations to the Board of Commissioners, i.e. by evaluating the Company's risk management policy guidelines (credit risks, market risks, liquidity risks, operational risks, legal risks, strategic risks, compliance risks, and reputation risks), evaluating the conformance between the Company's risk management policies guideline and its actual implementation, as well as monitoring and evaluating the Risk Management Committee's performance. . In carrying out its duties and responsibilities, the Risk Monitoring Committee is supported by the Enterprise & ESG Risk Management Division, which serves as the committee's secretariat. The committee holds regular meetings to discuss current issues, including BTN's Quarterly Risk Profile, Bank Soundness Level, Recovery Plan, Risk Maturity Index, and various other risk management-related matters. Additionally, the committee reviews BTN's Risk Management Policy Guidelines, which include the Bank's Risk Appetite and Risk Tolerance framework..

Risk Management Committee

The Risk Management Committee (KOMAR) actively provides recommendations to the President Director regarding risks associated with policies set by the Board of Directors. It also evaluates regulations that may no longer align with recent developments and require adjustments. KOMAR plays an active role in assessing risks associated with new products, services, and activities, enabling the company to take necessary mitigation measures. The committee also conducts evaluations of the General Risk Management Policy (KUMR).

Risk Management Task Force

The Risk Management Unit is a work unit that directly reports to the Director, overseeing the Risk Management function, and operates independently from the Operational Units, which are risk-taking units, as well as the Internal Audit Unit and the Compliance Unit.

The Risk & ESG Management Unit and the Operational & Digital Risk Management Unit at BTN are each led by a Division Head who reports directly to the Director of Risk Management. The Risk & ESG Management Unit comprises the Market & Liquidity Risk Management Department, Credit Portfolio Risk Management Department, Integrated Risk Management Department, ESG Department, and Model Validation. Meanwhile, The Operational & Digital Risk Management Unit includes the Fraud Risk Management Department, Digital Risk Management Department, Operational Risk Management Department, Regional Operational Risk Control Department, and Operational Risk Control Department.

Risk Management Policies and Procedures

The Bank has had management policies in risk management, which are Risk Management General Policy (KUMR), which contains the minimum provisions required by the Regulation of Bank Indonesia/Financial Services Authority.

These risk management guidelines are further complemented by internal policies, including but not limited to Guidelines for Risk Profile Assessment Reporting and Evaluation, Guidelines for Bank Soundness Level Reporting and Assessment, and Risk Model Validation Procedures. They also encompass Guidelines for Risk Data Collection for the Operational Risk Management Information System (ORMIS), Guidelines for Liquidity Risk Measurement Processes, Guidelines for Liquidity Coverage Ratio (LCR) Calculation and Reporting, Guidelines for Market Risk Measurement Processes, Interest Rate Risk Management in the Banking Book, Guidelines for Stress Testing Implementation, Risk Model Validation Procedures, Liquidity Monitoring Guidelines, aRisk & Control Self-Assessment (RCSA) Procedures,

Guidelines for Recovery Plan Implementation, Internal Credit Rating (ICR) Process Guidelines, Credit Scoring Model (CSM) Implementation Guidelines, Credit Authority Limits for Commercial and Consumer Loans, Guidelines for Allowance for Impairment Losses (CKPN) Calculation, Policies for Debtors Affected by Covid-19, Business Continuity Management (BCM) Policy, Business Continuity Plan (BCP) Technical Guidelines, Disaster Recovery Plan (DRP) Technical Guidelines, and Business Impact Analysis (BIA) Technical Guidelines.

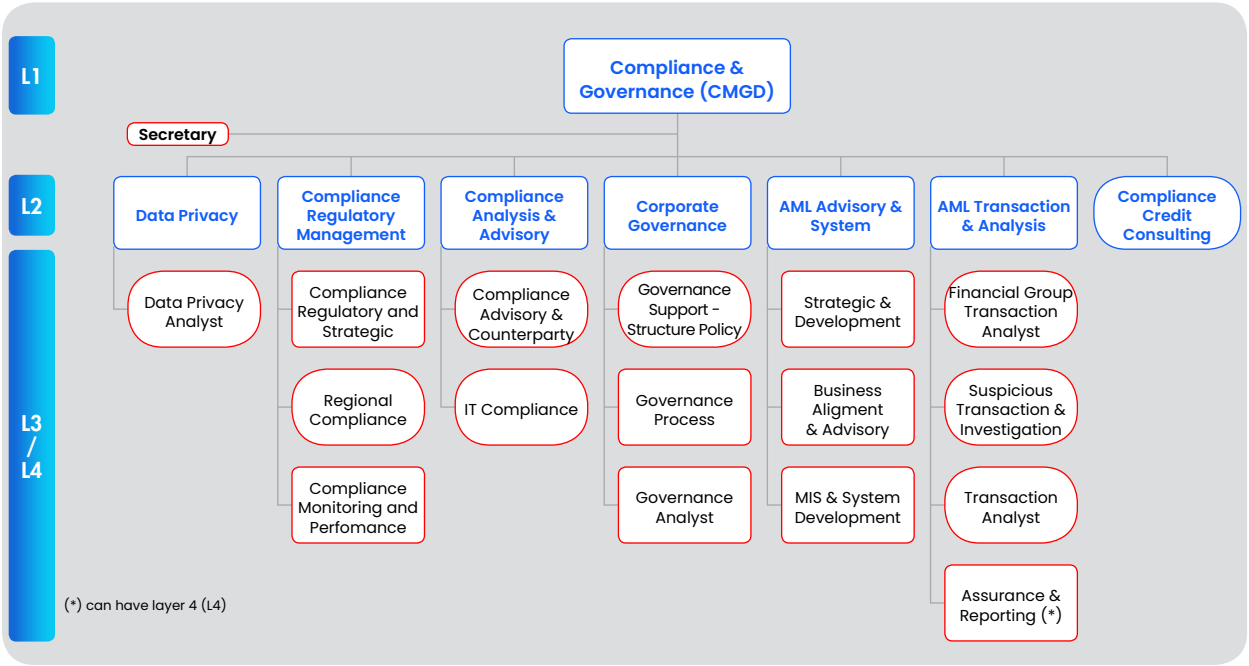
Re-assessment of internal policies has also been conducted to align with the most current provisions from relevant regulators, i.e. by conducting gap analysis and accommodating best practices commonly applied in the banking industry in order to improve the quality of the application of risk management. The Risk management information system at the initial phases was focused on the collection and improvement of risk database quality to allow gradual development and application into the risk management information system, thus allowing integrated risk measurement and risk monitoring as well as timely presentation.

Compliance Function

The banking industry is growing increasingly complex along with the growth of global information technology and integration of the financial market. With intense business competition among banks, this comes as a particular challenge that the Company needs to address. As such, it is necessary to enforce the principle of carefulness and take measures to mitigate risks associated with the Bank's business activities, both preventive (ex-ante) and curative (ex-post) measures. Ex-ante measures may be taken by complying with the applicable banking principles in order to reduce or minimize risks in the Company's business activities.

The Company has always consistently executed its compliance function, i.e. a set of preventive actions or measures. This is taken to, among others, achieve compliance culture across all organizational levels and all business activities in the Bank, manage compliance risks and ensure the Company's compliance with the Financial Services Authority or other relevant supervisory authorities.

Organizational Structure



The organizational structure for compliance function implementation is determined based on Technical Guidelines No. PT.3-A.6, regarding the Organizational Structure of the Head Office, Regional Offices, and Branch Offices. Adjustments to the organizational structure were also made following the Steering Committee Transformation meeting on August 13, 2024. The structure complies with OJK Regulation No. 46/POJK.03/2017, dated July 12, 2017, regarding the Implementation of Compliance Functions in Commercial Banks. The structure, further defined in the company's internal policies, consists of:

1. 1Board of Commissioners is responsible for actively supervising the implementation of the Company's Compliance Function.
2. Board of Directors is responsible for fostering and realizing the implementation of compliance culture across all organizational levels and business activities in the Company, as well as ensuring the implementation of compliance function at the Company.
3. Director of Compliance is a member of the Board of Directors who has been authorized by the Financial Services Authority to lead the Compliance Function and Compliance Task Force at the Company, and is responsible for formulating strategies to encourage the realization of compliance culture across the Bank and is also responsible for the performance of duties in order to ensure that the Company's Compliance Function operates properly.
4. Compliance and Governance Division is a Work Unit at the Head Office that serves as the Compliance Task Force for the Company and is responsible for implementing Compliance Function duties across the Company.

Lead Director of Compliance Function

The Director who leads the Company's Compliance Function is the Managing Director of Compliance and Legal Affairs. Appointment, dismissal, and/or resignation of the Lead Director of Compliance Function has been set out and shall follow the procedures below:

1. Appointment, dismissal, and/or resignation of the Lead Director of Compliance Function is specified in reference to the provisions for an appointment, dismissal, and/ or resignation of the member of the Board of Directors as specified in Bank Indonesia's regulations applicable to public banks, and should pass a fit and proper test in accordance with the applicable provisions of the Financial Services Authority.
2. In the event the Director of Compliance is temporarily unable to perform his/her assigned duties, the performance of such duties shall be temporarily delegated to other Director(s) up to the Lead Director of Compliance resuming his/her normal duties.
3. In the event the Lead Director of Compliance Function resigns or concludes his/her tenure, the Company shall immediately appoint a new Lead Director of Compliance Function. During the vacant period, another Director shall be appointed temporarily handle the duties of the Lead Director of the Compliance Function.
4. In order to satisfy independence requirements, the Director who serves as the Lead Director of the Compliance Function should not have a double role as President Director and/ or other directorial positions that may impair his/her independence.
5. Any replacement of the position of Lead Director of Compliance Function shall always be reported to the Financial Services Authority.

The 2021 GMS held on March 10, 2021, appointed Eko Waluyo as the Director of Compliance and Legal Affairs in accordance with OJK Circular Letter No. 39/ SEOJK.03/2016 dated September 13, 2016, on Capability and Fitness Assessment for Candidates for Controlling Shareholders, Candidates for Members of Board of Directors and Candidates for Members of Board of Commissioners of Banks, Director of Compliance may begin executing Compliance Function duties upon approval from OJK. Mr. Eko Waluyo has passed the Fit and Proper Test for Director of Compliance and has received formal approval from OJK on August 09, 2021.

Duties and Responsibilities of Lead Director of Compliance Function

The duties and responsibilities of the Compliance Director in carrying out the Compliance function include the following:

1. Formulate strategies to encourage compliance culture.
2. Propose compliance policies or compliance principles to be stipulated by the Board of Directors.
3. Stipulate compliance system and procedures to be implemented to develop the Bank's internal provisions and guidelines.
4. Ensure that all policies, provisions, systems, procedures, and business activities operated by the Bank comply with the provisions of the Financial Services Authority, Bank Indonesia, and other applicable laws and regulations, including Sharia principles.
5. Manage and minimize compliance risks.
6. Take preventive measures so that policies and/or decisions made by the Company's Board of Directors do not deviate from the provisions of the Financial Services Authority, Bank Indonesia, and applicable laws and regulations, including by providing a dissenting opinion in the event of policies and/ or decisions deviating from the provisions of Financial Services Authority, Bank Indonesia, and applicable laws and regulations.
7. Perform other duties related to Compliance Function, including monitoring and maintaining the Company's compliance with the commitment that the Company has made to Financial Services Authority, Bank Indonesia, and other relevant supervisory authorities.
8. Ensure that the Company's Compliance Task Force performs effectively in executing Compliance Function duties.

9. Coordinate with Sharia Supervisory Board regarding the implementation of the Compliance Function of the Sharia Business Unit in accordance with Sharia principles.
10. Act as a coordinator for the stipulation of Compliance Function to all business units to achieve good corporate governance

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Compliance Task Force

The role of the Company's Compliance Unit, as regulated under OJK Regulation No. 46/POJK.03/2017, concerning the Implementation of Compliance Functions in Commercial Banks, is carried out by the Compliance and Governance Division. This is further detailed in Technical Guidelines No. PT.3-A.6 dated September 14, 2023, regarding the Organizational Structure of the Head Office, Regional Offices, and Branch Offices, as well as the structural changes based on the Steering Committee Transformation meeting held on August 13, 2024. The organizational changes place the Compliance and Governance Division (CMGD) under the coordination of the Director overseeing the Compliance Function, ensuring its independence from business and operational units, risk management units involved in decision-making for the Company's business activities, treasury units, finance and accounting units, logistics and procurement units, and information technology management units.

The Compliance and Governance Division is led by a Division Head who has satisfied the specified criteria as the head of Compliance Function Task Force, as specified in OJK Regulation No. 46/POJK.03/2017 dated July 12, 2017, on Implementation of Compliance Function for Public Banks. Appointment and/or dismissal of the Head of Compliance and Governance Division shall always be reported to the Financial Services Authority in accordance with the criteria specified in compliance related to internal policies, as follows:

1. Satisfying independence requirements as set out in the provisions of the Financial Services Authority.
2. Possessing a deep understanding of the provisions of the Financial Services Authority, Bank Indonesia, and other applicable laws and regulations.
3. Not performing other duties beyond Compliance Function.
4. Highly committed to implementing and fostering a compliance culture.

Profile of Head of Compliance Task Force

The Company's Board of Directors has appointed Harman Soesanto as the Head of the Compliance Unit, effective January 15, 2024, as per the Board of Directors Decree No. 11/DIR/2024 dated January 15, 2024. His appointment has been reported to the Financial Services Authority (OJK).



Harman Soesanto
Head of Compliance Unit

Indonesian citizen,
54 years ols as of December 2024,
domiciled in Jakarta.

Educational Background

- Bachelor's Degree in Economics/Management – Brawijaya University
- Master's Degree in Management/Economics – University of Indonesia

Certification

- Banking Risk Management Certification Level 4
- Senior Credit Officer Certification

Work Experience

- Regional Office Head - Regional Office 5 (2022)
- Regional Office Head - Regional Office 6 (2023)
- Compliance and Governance Division Head (2024)

Legal Basis for Appointment

Board of Directors Decree No. 11/DIR/2024 dated January 15, 2024, appointing Harman Soesanto as Head of the Compliance Unit.

Duties and Responsibilities of Compliance Function

The duties and responsibilities of the Compliance and Governance Division in executing compliance function is as follows:

1. Develop measures to encourage the realization of compliance culture across all business units in the Company and across all organizational levels.
2. Coordinate with other units in performing identification, measurement, monitoring, and control of compliance risks in reference to the provisions of the Financial Services Authority on the Implementation of Risk Management for Public Banks.
3. Assess and evaluate the effectiveness, adequacy, and conformance of policies, provisions, systems, or procedures implemented in the Bank to the applicable laws and regulations.
4. Review and/or provide recommendations on update and refinement of policies, provisions, systems, or procedures implemented in the Company to maintain conformance to the provisions of the Financial Services Authority, Bank Indonesia, and other applicable laws and regulations, including sharia principles.
5. Take necessary measures to ensure that all policies, provisions, systems, procedures, and business activities operated by the Bank comply with the provisions of the Financial Services Authority, Bank Indonesia, and other applicable laws and regulations.
6. Perform other duties related to Compliance Function, including:
   a. Ensure the Company's compliance with the commitment made to the Financial Services Authority and/or other relevant supervisory authorities.
   b. Conduct socialization for all employees regarding matters related to Compliance Function, particularly in terms of applicable regulations from relevant regulators.
   c. Act as a contact person for compliance issues for both internal and external parties.
   d. Ensure business process in Compliance Task Force has been in accordance with the certification standard ISO 9001:2015 System Quality Management.
   e. Implementing ISO 37301:2021 on Compliance Management Systems.
   f. Ensure the implementation and results of self-assessment of corporate governance based on regulations of OJK in the Holding entity, Subsidiary, the Sharia Business Unit in Bank BTN to ensure the Company's quality process.
   g. Ensure the assessment of good corporate governance implementation by third parties/ independents in terms of achieving the Company's goal.
   h. Ensure Operational and Reporting Management related to the Implementation of AML and CFT in the Central Office.

Compliance Function's Competencies Development

The Compliance Unit's human resources have extensive experience in credit, operations, systems, and procedures. Currently, the Compliance Unit is supported by personnel holding Risk Management Certifications as follows:

- Risk Management Certification Level 4: 14 employees
- Risk Management Certification Level 5: 36 employees
- Risk Management Certification Level 6: 1 employee

To ensure the availability of highly qualified personnel within the Compliance Unit for effective task execution, various training programs and educational activities were conducted from January to December 2024, as detailed below:

Type of Training and Education	Number of Participants
Classroom / Virtual Classroom	
Aligning Strategy Execution With Environmental, Social and Governance (ESG)	1
Assessment for Junior Integrity Builder (API) Certification	18
BOD Sharing Session SDP 2024	4
BTN Leadership Forum 2 - 2024	2
BTN Millenial Leaders II - Kickoff	1
Business Performance Through Effective Coaching for Leaders	1
Coaching & Strategic Business Leaders	2
Millenial Leaders 2 "crafting leadership and future skill for next leaders"	1
BOD Talks & Meet The Expert -"Evolving in Finance: Leadership, Transformation, and Future of Banking in Indonesia"	6
Expert Talk Session "Empowering Woman Leadership to Strengthen Leadership Capability"	1
Expert Talk Session with Vice Minister of Foreign Affairs, Mr. Pahala Mansury - "Crafting Executive Savvy in Global Business Mindset"	3
Expert Talk Session "Empowering Women in Leadership with Purpose and Impact"	2
Identification of Suspicious Financial Transactions and Determination of Predi-cate Crimes 2024	4
Internalization of AML-CFT and PPPSPM Management	10
Officer Development Program (ODP) Batch 63	1
AML-CFT & PPPSPM Training	12

Type of Training and Education	Number of Participants
AML-CFT and PPPSPM Training Related to Individual Risk Assessment (IRA) 2024	8
Training on Understanding and Documenting Beneficial Owner (BO) Data	8
Operation Series Training: New HCIS Cloud for Key Users	1
Organization Design Training	1
SOP Development Training with AI	1
Presentation Skills Training	1
Credit Officer Certification Preparation	1
Risk Management Certification Preparation Level KKNI 4	14
Sustainable Financing Training for Syndicated Loans	5
Basic Sharia Banking Education (PDPS)	1
Risk Maturity Index (RMI) Evaluator Training)	1
Preparing for Merger, Acquisition, and Integration: Journey Towards a Seamless Transition	1
Consumer Credit Process New Decision Engine and Personal Loan	1
AML-CFT and PPPSPM Refresher for High-Risk Customers	6
Risk Management Level KKNI 4 Refresher - E-Learning Method	1
Risk Management Level KKNI 5 Refresher - E-Learning Method	20
Seminar "Financial Strategy for The Youth and Gen Z in Embracing Indonesia Emas 2045"	1
Internal Credit Consumer Level Staff Certification	1
Risk Management Competency Test Level KKNI 4	8
Supervisor Development Program (SDP)	5
Talent Acceleration Program II - Kickoff	2
Talent Acceleration Program 2 "Leadership Session"	2
Webinar on Retirement Planning: "Education on Old Age Security (JHT) and Em-ployee Welfare for a Healthy and Happy Retirement"	1
Webinar on Retirement Planning: "Education on Defined Benefit Pension Plans and Financial Planning"	1
Webinar on Building a Privacy-First Culture in Workplace : The Role of Human Capital in Data Protection	1
Webinar FKDKP "Ensuring Compliance of Financial Service Business Actors in Supporting Inclusive Economy through Supervision, Financial Education, and Consumer Protection in the Complexity of Financial Products"	2
Webinar FKDKP "Handling Banking Crimes with the Enforcement of the P2SK Law & OJK Regulation 16 of 2023"	15
Webinar FKDKP "Active Participation in Preventing Green Financial Crime in the Financial Industry"	6
OJK Webinar "Connecting The Dots"	1
OJK Webinar - How to Mitigate Transition and Physical Risks in the Financial Sector	1
OJK Webinar - Building Leadership Based on Spirituality: A Holistic Approach to Growth and Business Sustainability	3
OJK Webinar - Enhancing Corporate Performance through Artificial Intelligence	1
OJK Webinar - Handling Cyber Crimes, Including Online Gambling, as a Predicate Offense of Money Laundering	6
OJK Webinar - The Role of Innovative Credit Scoring (ICS) in Expanding Access to Funding	2
OJK Webinar "The Role of the P2SK Law in Deterring Illegal Financial Service Ac-tors"	1
Webinar OJK "Opportunities and Challenges in Personal Data Protection for Transactions in the Digital Era"	2
Webinar OJK - Forum for Strengthening GRC Functions: "Synergy and Collaboration with Ministries/Institutions and Stakeholders for Dissemination of the Latest Internal Audit Standards"	1
Webinar OJK "Strategies to Prevent Cyber Attacks"	4
Webinar OJK - Navigating The Half: "Year Roadmap To Success"	9
Workshop Indonesia Privacy Leader Summit: Two Years of the Personal Data	3
Workshop ASEAN Corporate Governance Scorecard (ACGS) 2024	4
Workshop on Recording of Personal Data Processing (ROPA) and Personal Data Privacy Impact Assessment (DPIA)	2
Young Leaders Talk "Leading with Impact, Crafting Your Success Story"	5
Online / Self Learning	
Compliance Excellence August 2024 Edition - Procedures for Implementing Anti-Money Laundering, Counter-Terrorism Financing, and Prevention of Prolifera-tion of Weapons of Mass Destruction (AML, CFT, and PFWMD)	52
Compliance Excellence April 2024 Edition - Government VA Services	50
Compliance Excellence February 2024 Edition - Security & Digital Risk Awareness	51
Compliance Excellence January 2024 Edition - Special Policy & Technical Guide-lines for Accounting Activities	50
Compliance Excellence July 2024 Edition - Special Policy on Conflict of Interest Guidelines	51
Compliance Excellence June 2024 Edition - Prohibition of Gambling Activities	51

Type of Training and Education	Number of Participants
Compliance Excellence March 2024 Edition - Gratification Control Program and SMAP ISO 37001:2016 Policy	51
Compliance Excellence May 2024 Edition - Foreign Exchange Transactions (BranchFX) at Branch Office	51
Compliance Excellence October 2024 Edition - Bancassurance Product Marketing	52
Compliance Excellence September 2024 Edition - Data Privacy Awareness	52
ESG (Environment, Social & Governance) Awareness Internalization	50
Internalization of IT Regulations	51
Internalization of Public Information Disclosure (KIP)	44
Internalization of BTN Cash Management Services	48
Internalization of IT, Digital & Cyber Risk Management 2024	49
Internalization of the New Grading System at BTN	48
Internalization of the SLE Index Achievement 2024	50
Internalization of Customer Data Management (CIF)	45
Internalization of Commercial Credit Recovery and Resolution	51
Internalization of Legal Clinic Podcast 2024	50
Internalization of Corporate Loan Process	47
Internalization of Respectful Workplace (RWP) 2024	41
Internalization of Sahabat Transformasi Episode 2	36
Internalization of Transformation 2024	42
Understanding Internal Regulations - BTN Internal Regulation Architecture	50
Refreshment BTN Property 2024	24
Refreshment BTN Smart Residence	32
Security Awareness BTN - Fordigi 2024	1
Socialization of Digital Risk Awareness & Cyber Trends	19
Socialization of Profitability Measurement System	16
Socialization of Easy in BTN Smart Residence Program	21
Socialization of Umbrella Campaign Bale by BTN	49
Total Participants of Education & Training	**1605**

Work Program and Implementation of Compliance Function Duties

Referring to OJK Regulation No. 46/POJK.03/2017 dated July 12, 2017, concerning the Implementation of Compliance Functions in Commercial Banks, the compliance function is a series of ex-ante (preventive) actions or steps to ensure that policies, regulations, systems, and procedures, as well as business activities conducted by BTN, comply with OJK regulations, banking regulators, and applicable laws, including sharia principles for UUS. It also ensures BTN's compliance with commitments made to the Financial Services Authority (OJK), Bank Indonesia (BI), the Financial Transaction Reports and Analysis Center (PPATK), and/or other relevant supervisory authorities.

In 2024, the implementation of the Compliance Function within the Company includes the following:

1. Implementation of Compliance Culture
   All employees are required and responsible for fostering a culture of compliance. The compliance culture is continuously developed to enhance awareness of compliance in performing tasks and activities within each work unit. The Company has formulated strategies to promote a culture of compliance at all levels of the organization and across all business activities consistently and sustainably through the following initiatives:
   a) Internalization of Bank Internal Regulations
      This program encourages employees to read and stay updated on internal regulations to ensure they understand and comply with all issued and applicable provisions. This initiative aims to strengthen the Company's Compliance Culture and serves as a preventive measure against fraud. The objective is to improve employees' understanding by encouraging them to read internal regulations, ensuring they are aware of and adhere to all relevant provisions while also preventing fraud.
   b) Compliance Index
      This system is designed to monitor the effectiveness of compliance programs in mitigating compliance risks. The Compliance Index parameters include regulatory sanctions, fraud reports, corporate culture scores, Compliance Excellence scores, overdue but unresolved audit findings, and the completion percentage of Branch Business Control (BBC) reports).

The purpose of implementing the Compliance Index is to measure, monitor, and control the Compliance Culture in each work unit to strengthen compliance awareness, minimize regulatory sanctions, reduce fraud, enhance corporate culture, improve understanding of internal regulations through Compliance Excellence, reinforce the Bank's commitment to resolving audit findings, and mitigate operational risks by ensuring the completion of Branch Business Control (BBC) reports.

c) Branch Visits

The Company has conducted visits to Branch Offices and Sharia Branch Offices to ensure compliance implementation within Work Units, execution of the Anti-Money Laundering (AML), Counter-Terrorism Financing (CFT), and Prevention of the Proliferation of Weapons of Mass Destruction (PFWMD) programs, and the control of gratuities. The purpose of branch visits is to verify that the Compliance Culture, AML, CFT, and PFWMD programs, and gratuity controls are well understood and properly implemented. Additionally, these visits serve to gather feedback and necessary information for evaluating future Compliance Culture programs.

d) Optimization of the Active Role of Regional Compliance Officers (RCO)

The Company is committed to optimizing the role and active involvement of Regional Compliance Officers (RCOs), who are responsible for monitoring and evaluating operational compliance implementation and ensuring compliance culture within Branch Offices and Sharia Branch Offices.

RCOs act as the Second Line of Defense at Regional Offices, assisting in building and monitoring compliance risk controls within their designated regions. This includes internalizing the Compliance Index at Branch and Sharia Branch Offices, conducting compliance function implementation internalization, overseeing the execution of AML, CFT, and PFWMD programs, and controlling gratuities. RCOs also collaborate with the Regional Business Center or Branch Business Control to enhance compliance control related to internal oversight and optimize the use of the Compliance Dashboard.

e) Compliance Excellence

Compliance Excellence is the Company's strategy for providing refresher training and/or internalization of regulations to all employees, fostering a strong compliance culture at all levels of the organization. The content of Compliance Excellence is based on significant and recurring audit findings, operational risk findings from the Regional Business Center and Branch Business Control, new regulations from regulators, newly issued internal bank regulations, and disciplinary sanctions imposed by the Human Capital Unit.

The objectives of Compliance Excellence include internalizing and refreshing regulations for all employees while evaluating the role of supervisors as compliance role models. This initiative helps cultivate a strong compliance culture, ensures employees share a common understanding of internal regulations, and addresses key factors contributing to non-compliance. By raising compliance awareness, the program provides strategic solutions to enhance adherence to regulations. Sepanjang periode Tahun 2024, telah dilaksanakan Throughout 2024, Compliance Excellence programs have been implemented and attended by all employees, as detailed below

:

No.	Month	Materi
1.	January	*Refresher on Special Policies and Technical Guidelines for Accounting Activities*
2.	February	*Security & Digital Risk Awareness*
3.	March	*Gratification Control Program and SMAP ISO 37001:2016 Policy*
4.	April	BTN Government VA Services (B-GOV VA)
5.	May	Foreign Exchange Transactions (BranchFX) at Branch Offices
6.	June	*Prohibition of Gambling Activities*
7.	July	Special Policy on Conflict of Interest Guidelines
8.	August	Procedures for Implementing Anti-Money Laundering, Coun-ter-Terrorism Financing, and Prevention of Proliferation of Weapons of Mass Destruction (AML, CFT, and PFWMD)
9.	September	*Data Privacy Awareness*
10.	October	*Bancassurance Product Marketing*
11.	November	BTN Current Account Products
12.	December	BTN Compliance Management System ISO 37301:2021

f) Compliance Broadcast
Compliance Broadcast is an initiative to foster and establish a compliance culture at all levels of the organization and the Company's business activities while enhancing the internalization and literacy of external regulations among all employees. The types of content broadcasted include external regulations, feedback from Compliance Excellence implementation, and posters with compliance-related messages.

The objective of this program is to internalize new regulations for all employees and enhance literacy on compliance, gratuities, and AML, CFT, and PFWMD.

2. Management of Bank Compliance Risk
The management of compliance risk is carried out continuously to strengthen the compliance culture in all business activities and organizational levels of the Company while mitigating the Company's Compliance Risk.
a) Compliance Risks Faced
One of the impacts of compliance risk exposure is the possibility of sanctions such as fines and written warnings from regulators, including the Financial Services Authority (OJK), Bank Indonesia (BI), the Financial Transaction Reports and Analysis Center (PPATK), and/or other relevant regulators.
b) Compliance Risk Mitigation Efforts
1) The Compliance Unit, in coordination with the Reporting Responsibility Unit, Data Support Unit, and Data Owner Unit, conducts discussions and coordination related to adjustments and improvements in reporting data. This step aims to minimize potential compliance risks by reviewing and synchronizing data, as well as validating the mapping of data sources to prevent errors in reporting.
2) The Company has implemented a go-live enhancement of the Compliance Regulatory Management System (CRMS), which includes an additional reminder feature for reporting obligations via WhatsApp to each PIC and Division Officer before the reporting deadline.
3) Reminders are sent via WhatsApp and email notifications to the proposing divisions for the Implementation of New Bank Products (PPB) and New Activities for the Bank's Interest (KKB), as well as activities related to IT service providers and/or electronic banking product issuance, regarding the obligation to report new product development realization to the regulator.
4) The Company has continuously developed the Compliance Dashboard to enhance compliance by adding parameters and increasing dashboard utility. The parameters of the Compliance Dashboard are focused on identifying potential compliance risks, particularly those arising from non-compliance with laws and regulations, including sharia principles for Sharia Commercial Banks (BUS) and Sharia Business Units (UUS).

The Bank has gradually optimized the use of the Compliance Dashboard to mitigate compliance risks by requesting confirmation and verification of compliance dashboard data parameters. This ensures that relevant work units can take preventive measures to minimize operational and compliance risks while mitigating violations of established regulations.

3. Bank Compliance with Regulatory Provisions and Other Laws
The Company has taken preventive measures to ensure that all business and operational processes comply with legal provisions, prevent compliance risks, and support sound and sustainable business growth. The Bank has established internal regulations and standard operating procedures for all employees to foster a Compliance Culture, ensuring that business activities align with applicable regulations and adhere to prudential principles.

Efforts made by the Company include:
a) Internalization of New Regulatory Provisions
The Company has internalized the latest regulations issued by regulators throughout 2024 through internal memos and email broadcasts to all work units and employees, ensuring that every new regulation is understood and complied with. This initiative ensures that each work unit adheres to newly issued regulatory provisions and confirms that all business and operational

activities are conducted in compliance with laws and regulations. These regulatory provisions are uploaded to the Compliance Regulatory Management System (CRMS) as a reference and regulatory database accessible to employees.

b) Internal Guidelines Evaluation
The Company conducts periodic evaluations of internal guidelines at least once a year, adjusting as needed and aligning with changes or updates in regulations issued by regulators. The evaluation process includes analyzing the impact of new regulations on the Company's business and operational processes, proposing necessary adjustments to internal policies and procedures, and ensuring that work units responsible for policy management conduct reviews of regulatory provisions to be incorporated into the Company's internal regulations.

The evaluation is conducted based on a three-pillar assessment process, involving the Compliance Unit, Risk Management, and Legal Unit, reviewing internal regulations that include General Policies, Special Policies, and Technical Guidelines. This ensures alignment with the latest internal company regulations and compliance with OJK, BI, PPATK, and other relevant legal requirements, including Sharia Principles for the Sharia Business Unit.

c) Compliance Review and Opinion on Business and Operational Activities
To ensure that all internal policies, systems, and procedures comply with applicable laws and regulations, the Compliance Unit conducts compliance reviews and assessments of proposed new policies, systems, and procedures (updates) or developments of existing procedures. This includes compliance reviews of new product/service development or new activities. The compliance review and opinion process ensures that any product and/or activity development, service facility enhancement, and internal policy adjustments do not violate regulatory provisions and comply with applicable legal requirements.

d) Compliance in Office Network Expansion and New Bank Product Implementation
The company, through the Compliance Unit, oversees and monitors the completeness of document requirements through a compliance checklist related to the plans for opening and relocating office networks, as well as the Provision of New Bank Products (PPB). Additionally, the Compliance Unit also serves as a liaison with the Regulator to consult on the Provision of New Bank Products (PPB) and New Activities for the Bank's Interests (KuKB) in relation to obtaining permits from the Financial Services Authority (OJK) and Bank Indonesia (BI). This implementation ensures that any issues faced by the Applicant Division can be promptly resolved and that the submitted licensing documents comply with the Regulator's provisions.

e) Implementation of Compliance Function in Credit Processes
The Company implements the Compliance Function in commercial credit business processes, including during the Pre-Credit Committee Meeting (Pre-RKK) and Credit Committee Meeting (RKK) through Compliance Credit Consulting. Additionally, compliance opinions/reviews are provided regarding fulfillment of requirements related to the Legal Lending Limit (BMPK), debtor and business legality, and the legality of financed projects during the Pre-RKK and RKK meetings.

f) Implementation of Law No. 27 of 2022 on Personal Data Protection (UU PDP)
The Company has implemented Law No. 27 of 2022 on Personal Data Protection (UU PDP) to ensure compliance and alignment of business processes with regulatory requirements. This initiative reflects the Company's commitment to safeguarding customer data privacy, enhancing data security, fulfilling legal requirements, ensuring that customer data is protected from unauthorized access and data breaches, and building customer trust and a strong reputation.

Follow-up actions on UU PDP implementation include:

1) Internalization of Personal Data Protection Provisions to enhance awareness and understanding among all employees through workshops, sharing sessions, and periodic e-learning programs.
2) Coordination with Data Protection Officers (DPOs) at other financial institutions through a Data Protection Officer Forum, ensuring that the Company's Personal Data Protection program aligns with industry standards.
3) Development of Special Policies and Technical Guidelines on Personal Data Protection, establishing benchmarks for Personal Data Processing, including Consent from Personal Data Subjects, Fulfillment of Data Subject Rights, Recording of Data Processing Activities (ROPA) and Data Privacy Impact Assessment (DPIA), Handling Personal Data Protection Failures, Third-party cooperation involving personal data exchange, and anctions for non-compliance with UU PDP and related regulations.

g) Implementation of Compliance Function in the Sharia Business Unit (UUS)

The Company ensures Sharia Compliance in the Islamic Business Unit (UUS) in coordination with the Sharia Supervisory Board (DPS). The Director of Human Capital, Compliance, and Legal, along with the Compliance Unit, collaborates with DPS through coordination meetings held at least once a year.

The Compliance Function at UUS ensures that internal compliance policies adhere not only to conventional banking regulations but also to Sharia principles. This guarantees that all UUS products and services fully comply with Sharia guidelines.

4. Bank Compliance with Commitments to Regulators

a) The Company consistently strives to fulfill all commitments to OJK, BI, PPATK, and/or other relevant authorities. To ensure compliance with the commitments required by regulators and competent authorities, the Company, through the Compliance Unit, coordinates with relevant divisions to assign responsibilities for reporting obligations arising from new regulations issued by the regulators. The Compliance Unit continuously monitors work units to ensure compliance with all required commitments. These commitments may originate from OJK, BI, PPATK, and/or other relevant authorities, as well as mandatory reporting obligations as stipulated by the applicable regulatory provisions. The results of monitoring compliance with these commitments are regularly reported in the compliance report to OJK and the President Director, with copies sent to the Board of Commissioners.

b) In implementing prudential banking principles, The Company monitors the level of compliance with these principles to ensure that there are no violations and/or breaches in their application. Compliance is reflected in key banking ratios, including the Minimum Capital Adequacy Requirement (KPMM), Legal Lending Limit (BMPK), Minimum Reserve Requirement (GWM), and Net Open Position (PDN).

c) The Company consistently monitors its commitments to OJK, BI, PPATK, and/or other supervisory authorities regarding the resolution of commitments related to external audit findings. This is done through the Internal Audit Unit (SKAI) and the Compliance Unit (SKK), which have been and will continue to monitor relevant divisions to ensure timely follow-up and completion of commitments related to overdue external audit findings. The Company also ensures that all remaining findings are addressed promptly, without waiting for their official due dates.

d) The Company has monitored and taken follow-up actions on requests for information and/or data from OJK and BI as part of the Bank Supervision process. Through coordination with the relevant work units and while maintaining data confidentiality principles, the Bank has responded to and provided all requested information and/or data within the required deadlines set by OJK and BI.

5. Implementation of Personal Data Protection

The Company recognizes that Personal Data Protection is a fundamental human right, as stated in the 1945 Constitution of the Republic of Indonesia and Law No. 27 of 2022 on Personal Data Protection.

In conducting all business processes, services, and activities involving personal data, BTN is committed to fulfilling its obligations as a data controller and/or data processor in a trustworthy and responsible manner. The Bank prioritizes the rights of Data

Subjects to ensure BTN's compliance with the applicable laws and regulations

Personal Data Protection Officer and Active Management Oversight

The Company established the Data Privacy Department, which serves as the personal data protection officer under the Compliance Unit within the Directorate of Human Capital, Compliance & Legal, and is actively supervised by the Board of Directors through various internal forums. The Data Privacy Department plays a role in Developing frameworks, and policies, and implementing personal data protection programs. To ensure comprehensive implementation of personal data protection controls Bank-wide, the data Privacy Department regularly coordinated with other relevant units, including:

- Information Technology Security unit, to ensure the Security of Personal Data being processed, reducing the risk of cyberattacks and personal data protection failures.
- Information Technology Development Unit, to ensure compliance with the Personal Data Protection Law (UU PDP) in all BTN applications and websites.
- Data Management Unit, to ensure personal data processing follows the principle of data minimization and implements data privacy by design.
- Customer Service Unit, to ensure the fulfillment of personal data subject rights and to address inquiries related to Personal Data.
- Risk Management and Legal Unit, to ensure risk mitigation for personal data processing carried out by The Company.
- Business Unit, to ensure the implementation of the Personal Data Protection Law (UU PDP) across all BTN products and services..

Building a Sustainable Culture of Personal Data Protection at BTN

The Company actively implements awareness programs for all employees regarding personal data protection, which include:

1. **Dissemination, Internalization, and Training:** The Company regularly conducts socialization and training programs to build awareness about personal data protection. These are delivered through various media and are mandatory for all BTN employees. Additionally, The Company ensures the internalization of personal data protection policies so they can be applied across all business lines of the Bank.
2. **Workshop:** BTN organizes workshops to implement personal data protection controls under the established framework and applicable regulations.
3. **Campaign**: BTN runs campaigns on Personal Data Protection through its digital channels to ensure that all customers are aware of the importance of Personal Data Protection.

Personal Data Protection Framework and Implementation

In carrying out personal data protection activities, the Company has established a framework aligned with applicable regulations and relevant best practices, as outlined in the following policy documents:

1. Personal Data Protection Policy.
2. Customer and Community Protection Policy.

According to these policies, all Personal Data Subjects (including customers, prospective customers, employees, prospective employees, third parties, and other individuals) interacting with The Company are required to complete and provide consent for the processing of their Data. The Company also facilitates **Personal Data Subjects** in exercising their rights, such as accessing and requesting corrections/updates to their Personal Data and withdrawing consent for the processing of Personal Data, provided it does not conflict with applicable regulations.

For the processing of personal data carried out by The Company or external parties, the Bank implements control measures, including the provision of Records of Processing Activities (ROPA), Data Protection Impact Assessments (DPIA), Non-Disclosure Agreements (NDA), and cooperation agreements that strongly protect and limit the processing of personal data of Data Subjects related to The Company.

Transparency in Personal Data Management

As a form of transparency to Data Subjects regarding the types of personal data collected, the processing duration, and the purposes of personal data processing, The Company has published a privacy policy accessible at www.btn.co.id/privacy-policy, and other The Company digital platforms.

Other Compliance Functions

The Company also continuously improves its business processes as part of compliance activities, including:

1. **ISO 37001:2016 Anti-Bribery Management System**
   In implementing ISO 37001:2016 Anti-Bribery Management System (ABMS), the Compliance Unit serves as the Anti-Bribery Compliance Function (FKAP) with responsibilities including: overseeing the design and implementation of ABMS, providing guidance and instructions to employees regarding ABMS, ensuring ABMS compliance with applicable standard requirements, and reporting ABMS performance to the Governing Body and Top Management. The Company has successfully maintained its ISO 37001:2016 Certification for the scope of Surveillance): Procurement and Fixed Asset Management Division (PFAD), Commercial Banking Division (CMBD), Corporate Banking Division (CBD), SME Restructuring in (West Java Regional Office, Jakarta II Regional Office, East Java Bali Nusra Regional Office, Sumatra Regional Office, Sulawesi Maluku Papua Regional Regional Office, Central Java DIY Regional Office), Wholesale Credit Risk Division (WRD), Small Medium Enterprise Banking Division (SMBD), and Commercial Banking Center (Jakarta Raya, Bintaro Jaya, Bekasi, and Bandung). To maintain the ISO 37001:2016 ABMS certification, a Surveillance Audit was conducted from October 7 to 11, 2024, by the Certification Body, resulting in BTN successfully retaining its ISO 37001:2016 ABMS certification. Additionally, an audit was conducted by the Certification Boady for an extended scope covering the Credit Operation Division (COD), resulting in the Company successfully obtaining certification for the extended scope. As a result, the Company now holds ISO37001:2016 ABMS certification for a total of 16 functional units.
2. **ISO 37301:2021 Compliance Management System**
   The company obtained ISO 37301:2021 Compliance Management System certification on December 30, 2022, with the scope of implementation in the Compliance & Governance Division. The scope includes compliance functions, corporate governance, and anti-money laundering. The implementation of the ISO Compliance Management System provides guidance and a standardized framework, as well as improvements in compliance business processes. To maintain ISO 37301:2021, a Surveillance audit was conducted in 2024, and the company successfully retained the ISO 37301:2021 Compliance Management System certification.
3. **Integrated Governance Risk and Compliance**
   The implementation of Integrated Governance Risk and Compliance (GRC) in the company is in line with the company's transformation blueprint, aiming to achieve an integrated GRC through the practice of governance, risk management, and compliance in a unified manner. In the GRC Index Assessment, an assessment method will be carried out for each work unit using measurement tools such as Key Performance Indicators. Each work unit will have a GRC Index, which serves as an indicator for the integrated application of governance, risk management, and compliance aspects. Bank has prepared a Governance, Risk, and Compliance roadmap 2025-2029 designed to strengthen the organization's ability to meet regulatory requirements, manage risks effectively, and ensure good corporate governance. This initiative integrates governance oversight, risk management, and compliance processes to support sustainable business growth and operational resilience.
4. **Implementation of the Compliance Work Unit's Role in Personal Data Protection (Data Privacy)**
   The company understands that personal data protection is a fundamental human right, as outlined in the 1945 Constitution of the Republic of Indonesia and Law No. 27 of 2022 on Personal Data Protection.

   In carrying out all business processes, and activities that involve personal data, the company is committed to fulfilling its obligations as the controller and/or processor of personal data with integrity and responsibility. Additionally, the company prioritizes the fulfillment of personal data subjects' rights to ensure compliance with applicable laws and regulations
5. **Business Competition Compliance Program**
   The company has officially established the Business Competition Compliance Program, as determined by the Business Competition Supervisory Commission (KPPU) on December 13, 2024. This program aims to ensure that the company conducts its business processes under the principles of fair business competition.

   The steps that have been implemented by the company are as follows
   :

   a. Improving the Business Ethics and Behavior Code of Conduct by adding elements related to business competition through the Joint Decree of the Board of Commissioners and Board of Directors regarding the Business Ethics and Behavior Code of Conduct.

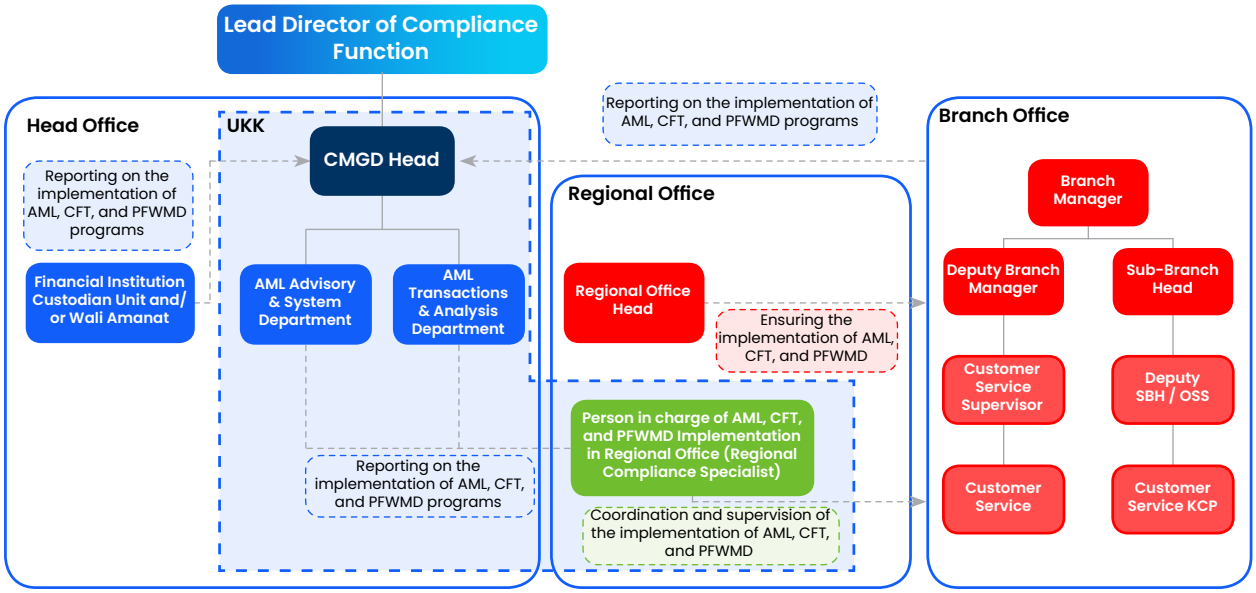
b. Developing a Special Policy on Business Competition Compliance Procedures, Number KK.6-J regarding Business Competition Compliance Procedures.
c. Signing the Integrity pact for business Competition compliance by the President Director.
d. Appointing a person responsible for business competition compliance.
e. Identifying and mitigating risks related to potential violations of articles in Law No. 5 of 1999.
f. Conducting socialization, counseling, and training on business competition compliance for all employees as a mandatory part of the business competition program.
g. Establishing a supervision scheme in the form of a hierarchical structure to effectively monitor the implementation of the Business Competition Compliance Program as outlined in the Business Competition Compliance Procedures.
h. Establishing an internal reporting mechanism for suspected violations of the Business Competition Law through a whistleblowing system (WBS).
i. Developing monitoring and evaluation efforts to identify early potential failures in the implementation of the Compliance Program or to detect behaviors that violate the Business Competition Law.

Anti-Money Laundering (AML), Counter-Terrorism Financing (CTF), and Prevention of the Proliferation of Weapons of Mass Destruction (PFWMD) Program

The Company implemented Anti-Money Laundering (AML), Counter-Terrorism Financing (CFT), and Prevention of the Proliferation of Weapons of Mass Destruction (PFWMD) programs in customer recognition activities by referring to regulations and legislation. As part of the efforts to encourage the effectiveness of implementing the AML, PPT, and PFWMD programs and to comply with regulatory requirements, the Company established a Special Work Unit (UKK) for AML, CFT, and PFWMD at the Head Office. The implementation of the AML, CFT, and PFWMD programs in Regional Offices and Branch Offices is the responsibility of each Regional Office Head and Branch Manager.

Organizational Structure in the Implementation of AML, CFT, and PFWMD

The implementation of the AML and PPT program is carried out by the Special Work Unit (UKK) AML, CFT, and PFWMD which is structurally under the Compliance Work Unit (SKK) of the Head Office and is directly responsible to the Director who is in charge of the compliance function which can be described as follows:



To implement the AML, CFT, and PFWMD programs effectively and in compliance with regulatory requirements, apart from Special Work Unit (UKK) for AML, CFT, and PFWMD at the Head Office, the AML, CFT, and PFWMD programs were also implemented at Regional Offices and Branch Offices..

Anti-Money Laundering and Counter-Terrorism Financing Program (AML and CFT)

The implementation of the Anti-Money Laundering, Countering the Financing of Terrorism, and Countering the Financing of Proliferation of Weapons of Mass Destruction (AML, CFT, and CPFWM) program is carried out based on the five pillars of the implementation of the Anti-Money Laundering, Countering the Financing of Terrorism, and Countering the Financing of Proliferation of Weapons of Mass Destruction Program in the Financial Services Sector as stipulated in the Financial Services Authority Regulation (PJOK) No. 8 of 2023 regarding the Implementation of the Anti-Money Laundering, Countering the Financing of Terrorism, and Countering the Financing of Proliferation of Weapons of Mass Destruction Program in the Financial Services Sector.

a. Active Supervision by the Board of Directors and Commissioners

The Board of Directors and Commissioners actively supervise the implementation of the AML, CFT, and CPFWM program at the company to ensure that the AML, CFT, an CPFWM procedures are implemented effectively by:

1. Providing guidance on periodic reports (monthly, quarterly, and semi-annual) regarding the implementation of the AML, CFT, and CPFWM program at the bank;
2. Discussing the implementation of the AML, CFT, and CPFWM program in Board of Directors and Commissioners meetings;
3. Evaluating the policies and procedures related to the AML, CFT, and CPFWM program;
4. Approving the Director's report on the plan and actual updates of customer data..

b. Policies and Procedures

Comprehensive policies and procedures are required to identify, assess, and manage risks related to Money laundering (ML), Terrorism Financing (TF), and Proliferation Financing of Weapons of Mass Destruction (PFWMD), which are reviewed periodically. The provisions related to AML, CFT, and CPFWM regulate the following matters:

1. Provisions related to the identification and verification of prospective customers, customers, and WIC;
2. Provisions related to the implementation of Transaction Suspension and Transaction Delay;
3. Provisions related to the implementation of the closure of business relationships and transaction rejection
4. Provisions related to Monitoring and Updates;
5. Provisions related to Cross-Border Correspondent Banking;
6. Provisions related to the implementation of Fund Transfers;
7. Provisions related to the management of documents related to AML, CFT, and CPFWM;
8. Provisions related to reporting both internal to the bank and external to the regulators.

c. Internal Control

An effective and independent internal control system is routinely applied to ensure compliance with the AML, CFT, and CPFWM Policies by:

1. Adequate internal monitoring as regulated in the AML, CFT, and CPFWM Policies and Procedures;
2. Clear authority and responsibility limits related to units implementing the AML, CFT, and CPFWM programs;
3. Independent audits are conducted to ensure the effectiveness of the implementation of the AML, CFT, and CPFWM program;
4. Following up on all audit results both internal and external related to the implementation of the AML, CFT, and CPFWM program under the established timelines.

d. Management Information System (MIS)

To monitor and identify suspicious transactions, the Company continuously develops an information technology system, including:

1. Development of Unusual Customer Transactions (UCT) parameters in the Bank's AML, CFT, and CPFWM applications;
2. Seamless integration of the customer identification and verification system;
3. Development of a monitoring system for AML, CFT, and CPFWM reports;

e. Human Resources (HR)

Training and development of HR are crucial to ensure that employees have the necessary knowledge and skills to implement the AML, CFT, and CPFWM programs. The Company continuously conducts training, internalization, and reminders on the implementation of these programs to increase awareness among all employees, especially those who directly interact with customers (frontliners), employees overseeing the implementation of the programs, and those involved in preparing reports to PPATK an OJK. The training is conducted effectively and interactively as follows:

1. Thematic refreshment of AML, CFT, and CPFWM for employees using print or digital media through internal Bank platforms;
2. Internalisasi Awareness APU, CFT dan PFWMD 2024.

a) Training of Trainer
The Bank organizes a Training of Trainers (TOT) activity to enhance understanding of the implementation of AML, CFT, and CPFWM programs among employees who interact with customers and/or WIC, such as customer service representatives. The expected output of this activity is that the internalization process can be continuously carried out by the participants to other employees, ensuring that the understanding of AML, CFT, and CPFWM programs is disseminated effectively, consistently, and interactively.

b) Training on Beneficial Owner (BO)
The bank organizes training sessions on Beneficial Ownership (BO) to improve employees' understanding of the implementation of AML, CFT, and CPFWM programs, particularly in the execution of Customer Due Diligence (CDD) processes for prospective customers, current customers, and WIC with a Beneficial Owner (BO).

c) Training on Understanding and Implementing AML, CFT, and CPFWM Programs for High-Risk Customers.
The Company organizes sessions to increase employees' understanding in performing Customer Due Diligence (CDD) and Enhance Due Diligence (EDD) on high-risk customers, enhancing vigilance against Money Laundering, Terrorism Financing, and Proliferation Financing.

3. AMOLA Office Battle BTN 2024
The AMOLA Office Battle BTN 2024 is a quiz competition on AML, CFT, and CPFWM between all Branch Offices (Conventional and Sharia) from each Regional Office. The participants of the AMOLA Office Battle BTN 2024 are teams consisting of three people, and each team must include representatives from the Customer Service Supervisor and Customer Service Staff at each Branch Office. This activity aims to improve competence and understanding of AML, CFT, and CPFWM programs, as well as to enhance self-awareness regarding the importance of fostering a culture of compliance in the implementation of AML, CFT, and CPFWM programs.
4. Branch Visit dan Surprise Review
Branch visits are conducted to increase awareness at Branch offices by internalizing the program at these locations, considering factors such as the distribution of Financial Transaction Reports (LTKM), documentation of Beneficial Owner data, incomplete CIF, high-risk customers, and audits from the 2023 AML and CFT thematic audit.

Additionally, surprise reviews are carried out periodically at Branch Offices to assess employees' understanding and evaluate the effectiveness of the implementation of AML, CFT, and CPFWM programs.

Submission of Reports and Data to Regulators and/or Law Enforcement Officials

a. Submitting Financial Transaction Reports to the Center for Financial Transaction Reports and Analysis (PPATK) as follows:
   a. Cash Transaction Report (LTKT)
   b. Suspicious Transaction Report (LTKM)
   c. International Funds Transfer Instruction Reports (LTKL)
   d. Integrated Service User Information System Report (SIPESAT) PT Bank Tabungan Negara (Persero) Tbk 637 2023 Annual Report
b. Conveying Data/Information Compliance to the Law Enforcement & Regulatory Officials as follows:
   a. Information System for AML and CFT Program (SIGAP) to the Financial Services Authority (OJK)
   b. Anti-Money Laundering (AML) and Counter-Terrorism Financing (CFT) report via Online Reporting Application (APOLO)
   c. Information System for Suspected Terrorism Financing (SIPENDAR) to the Center for Financial Transaction Reports and Analysis (PPATK)
   d. Electronic Data Exchange Application Report (PEDAL) to the Corruption Eradication Commission (KPK)
   e. Fulfillment of data requests by the Supervisory and Regulatory Agency (LPP) and other Law Enforcement Officials (APGAKUM), namely the Police, National Narcotics Agency (BNN), Prosecutor's Office.
c. Submitting reports related to the Implementation of General Elections and Regional Head Elections to the Center for Financial Transaction Reports and Analysis (PPATK) as follows:
   a. Monitoring the Special Campaign Fund Account (RKDK).
   b. Screening of political party treasurers, central, and regional management boards.
   c. Screening of the Permanent Candidate List (DCT) of General Election and Regional Head Election participants submitted by PPATK.
   d. Submitting all reports and requests for information related to the implementation of the 2024 General Election and Regional Head Election .

Risk Assessment of AML, CFT, and CPFWM

The Company has conducted periodic and continuous risk assessments for Money Laundering (TPPU), Terrorism Financing (TPPT), and Proliferation Financing of Weapons of Mass Destruction (PFWMD). In 2024, the Bank conducted an Individual Risk Assessment (IRA) to identify, assess, and understand the risks related to TPPU, TPPT, and PPPSPM in relation to customers, countries, or geographical areas, products, services, transactions, or distribution networks.

Financial Integrity Rating Assessment by PPATK

The Financial Integrity Rating (FIR) indicates the level of commitment, implementation, and compliance of the reporting party with Indonesia's Anti-Money Laundering and Counter Financing of Terrorism AMLCFT) regime. In 2024, the Company received a "Very Good" category in the FIR, ranking above the average FIR for KBMI 3 and exceeding the average FIR for general banking financial service providers.

Active Participation of the Bank in the AML, CFT, and CPFWM Programs Organized by Regulators/Government, including:

1. Partnership in the National Movement for the 22nd Year of the AML, CFT Regime in Indonesia;
2. Active Role in Surveys and performance Effectiveness Index Assessments by PPATK in efforts to prevent and combat Money Laundering (TPPU) and Terrorism Financing (TPPT);
3. Participation in the Collaborative Analysis Team (CAT), a collaboration for information exchange between the public sector, including PPATK, reporting parties, regulatory and supervisory agencies (LPP), and law enforcement;
4. Participation in the Financial Transaction Fraud Handling Center (PUSAKA);
5. Involvement in the National Discussion on PPATK together with FKDKP, and other activities related to AML, CFT, and CPFWM.
6. As part of the Bank's commitment to supporting the eradication of illegal activities, including online gambling and account trading, the Bank has implemented an AML, CFT, system with parameters to detect Unusual Customer Transaction (UCT) related to gambling and conducts daily cyber patrol activities

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Legal Case

Table of Lawsuits

No.	Legal Case	Total		
		Civil	Criminal	Industrial Relations
1.	Already settled (has permanent legal force)	119	14	2
2.	In the process of set-tlement	177	9	2
Total		296	23	4

Legal Cases Facing The Company

Table of Legal Cases Faced by the Company

No	Case/ Claim	Settlement Status	Impact on the ompany's Condition	Management's effort	Verdict	Risk and Claim Amount
1.	Claim filed by debtor related to the settle-ment of the certificate used aas collateral which has not been resolved by the develop-er.	Supreme Court Review Process (PK)	Risk of the Bank paying compensation	The Bank files a legal effort for Supreme Court Review (PK)	None	Rp108.000.000
2.	Claim for compen-sation against the Bank and external parties related to the misuse of funds placed by the customer.	Supreme Court Review Process (PK)	Risk of the Bank paying compensation	The Bank files a legal effort for Supreme Court Review (PK)	None	Rp1.317.500.000
3.	Claim filed by the fund owner relat-ed to the loss of funds placed in the Bank.	Cassation Process in the Supreme Court	Risk of the Bank paying compensation	The Bank files a legal effort for Supreme Court Review (PK)	None	Rp33.600.000.000
4.	Claim filed by the fund owner relat-ed to the loss of funds placed in the Bank.	Cassation Process in the Supreme Court	Risk of the Bank paying compensation	The Bank files a legal effort for Counter-Memo for Cassation	None	Rp30.777.210.669

Lawsuits/Important Issues Faced by The Board of Directors and Commissioners

During 2024, no current members of the Board of Directors and Commissioners of the Company had either civil or criminal legal issues.

Lawsuit/Important Issues Faced By Subsidiaries

Until 2024, Bank BTN does not yet have a Subsidiary, so there is no information on legal issues being faced by Subsidiaries.

Administrative Sanctions Imposed onThe Company, Members of The Board of Commissioners and Directors by The Capital Market Authority and Other Authorities

The Company strives to fulfill its responsibilities and comply with all Laws and Regulations, Regulations of the Financial Services Authority and other Authorities that apply to the Company. Throughout 2023, there were no administrative sanctions imposed on the Company that affected the continuity of the Company's business and there were no administrative sanctions imposed on members of the Board of Directors or members of the Company's Board of Commissioners

Access to Company Information and Data

The Company provides access to information and data, both financial and non-financial related reports to the public in a transparent manner through various media such as websites (in two languages), mass media (press releases), internal magazines/ bulletins, meetings with analysts, IDX official website, product posters and banners, corporate actions, Company presentation materials to the public and so on. Access to Company information regarding financial and company information, among others, can be done through the following media:

1. Website www.btn.co.id which is presented in Indonesian and English, as well as conveys information regarding the following:
   a. Shareholder information up to individual ultimate owners;
   b. Financial performance analysis;
   c. Annual financial statements for the last 5 years; and
   d. Profile of the Board of Commissioners and the Board of Directors.
2. For more information, customers can contact **BTN Call 1500 286** or email **btncontactcenter@btn.co.id** or **csd@btn.co.id.**
3. Investors can directly contact the Corporate Secretary/ Investor Relations of the Company by sending an email to **investor_relations@ btn.co.id** The Company's Public Information Request Service through the **ppid.btn.co.id** website and/or the **BTN PPID** android application that can be downloaded through the smartphone of information users.
5. The company also continuously submits information disclosure reports and/ or material facts to the Financial Services Authority and the Indonesia Stock Exchange as well as through the electronic reporting systems **spe.ojk.go.id** and **idxnet.co.id** and the website **www.btn.co.id**.
6. Information through other media, including mass media (press releases), internal magazines/bulletins, posters, and banners.
7. Report submissions to regulators, analyst meetings, press conferences, and so on Information through other media, including mass media (Press Releases), internal magazines/ bulletins, posters and banners. In addition to more specified information about the Company, the public and investors can contact:

Corporate Secretary
Ramon Armando
Menara BTN
Jl. Gajah Mada No. 1, Jakarta Pusat 10130
Telp: (021) 6336789 ext. 2003
Faks: (021) 6336719
Email: csd@btn.co.id

Investor Relations

The Company always maintains a harmonious relationship with shareholders, potential investors, analysts and other capital market communities by holding regular activities such as meetings with analysts/investors on a national and international scale as well as performance exposure to the public. The Company also fulfills information disclosure obligations as regulated in the Capital Market such as Disclosure of Material Information or Facts, Financial Statements, Annual Reports and Certain Shareholders Reports.

The contacts for the Company's Investor Relations are as follows:

Investor Relations
Winang Budoyo
PT Bank Tabungan Negara (Persero) Tbk
Menara BTN Lt. 16, Jl. Gajah Mada No. 1
Jakarta 10130 Indonesia
Telp : +62 21 63870107
Email : investor_relations@btn.co.id
Website : https://www.btn.co.id/Investor-Relation-Home

Profile of Investor Relations Head



Winang Budoyo
Investor Relations Head

Indonesian Citizen,
55 years ols as of December 2024,
domiciled in Bekasi.

Educational Background
- S1 Bachelor of Economics – Universitas Indonesia
- S2 Master of Economic Studies – University of Queensland

Certification
-

Work Experience
- Investor Relations & Research Division Head and Chief Economist BTN (2020 – present)
- Investor Relations Department Head and Chief Economist BTN (2018 –2020)

Legal Basis for Appointment
21/KUASA/DIR/2020 dated April 28 2020

Investor Relation's Duty and Responsibilities

Relations actively organizes meeting forums with analysts, investors, rating agencies and other capital market communities to ensure that information disclosure can be carried out properly. The authority of Investor Relations following the Special Policy (KK) 9-AA is as follows:

1. Manage all communication activities with analysts, investors and the capital market community to provide an overview of the company's performance and prospects to analysts and investors.
2. Managing all communication activities with analysts and investors, including the capital market community starting from communicating Bank BTN's performance and developing an appropriate image, to carrying out communication programs to the capital market community to provide an overview of the company's performance and prospects to analysts and investors.
3. Ensure that the quality of data collected regarding business performance and prospects is valid and accurate data to be communicated to the investor community and capital market community in order to optimize investment in the Company. Manage and ensure accurate data collection activities to support analysis and modeling to optimize investment in the company.
4. Managing the availability of reports related to investor responses, valuation, and stock performance to the Board of Directors to provide opinions in preparing the company's business and financial strategies.
5. Supporting the reporting process to regulators to fulfil the compliance functions in accordance with applicable regulations.
6. Managing the Bank's performance communication activities to the public, Bank Investors, and the Capital Market.
7. Ensuring the quality of data communicated in terms of validity, accuracy, and sources of information to provide appropriate information regarding the company's performance and prospects to investors as well as optimizing investment in the Bank.
8. Proactively providing information to the capital markets community and seeking opinions on strategic matters.
9. Managing the procurement of Investor Relations Communication Activities and meetings with other stakeholders regarding the delivery of company business and financial information to provide company prospects to investors in optimizing investment in Bank BTN.
10. Preparing presentation materials for Investor Relations communication activities.
11. Providing Bank data and information regarding Bank performance through the Investor Relations website to provide easier and wider access, in which the information includes:
    a. Monthly and quarterly financial reports, Liquidity Sufficiency Ratio Report (LCR), Net Stable Funding Report (NSFR), Risk Exposure and Capital Report, Entity Financial Report, and Leverage Ratio Report following the Financial Services Authority (OJK) requirements as a banking company in Indonesia.

b. Publication of consolidated financial reports every quarter and audited for the year-end period in accordance with the Financial Services Authority (OJK) requirements as a public company as well as presentation materials for the Analyst Meeting.
c. Annual Report which is a comprehensive report for the public and stakeholders on Bank BTN's performance achievements, business, and other activities.

The basic principles used by Investor Relations in communicating with the capital market community are:
1. Fair disclosure of information by taking into account the principles of equitable treatment and transparency.
2. Information is provided by adhering to the precautionary principle and taking into account the applicable confidentiality provisions in the banking sector.

The public exposure methods used are as follows:
1. Direct, which includes: General Meetings of Shareholders, Public Expose, Non Deal Roadshow, Investor Conference, Press Conference, 1-on-1 Meetings, Group Meetings, Conference Call, Branch Visits and Site Visits.
2. Indirect, which includes Annual Reports, Published Financial Statements, Press Releases, Website, Broadcast Media (TV, Newspaper, Online Media), Social .

Implementation of Investor Relations Duties

A. Investor Relations Activity

In 2024, activities and interactions of the Investor Relations unit with investors, analysts, rating agencies, and capital market communities, are as follows:
1. 4 (Four) Analyst Meetings throughout the year.

Date	Topic	Description
February 12, 2024	Analyst Meeting FY23 (audited)	Video Conference Call
April 25, 2024	Analyst Meeting 1Q24 (unaudited)	Video Conference Call
July 25, 2024	Analyst Meeting 1H24 (unaudited)	Video Conference Call
November 28, 204	Analyst Meeting 9M24 (limited review)	Video Conference Call

2. Organizing Annual Reviews with national and international rating agencies which were held 3 (three) times a year.

Date	Rating Agency
June 20, 2024	Pefindo
September 19, 2024	Fitch Ratings
November 20, 2024	Moody's

3. Interactions and discussions with investors and analysts in conference meetings or non-deal roadshows throughout the year..

Date	Activities
January 12, 2024	UBS Banks Day
January 22-26, 2024	Local Non-Deal Roadshow with CGS International
January 30, 2024	Virtual Regional Small cap Book Conference with RHB Securi-ties
February 19 - 22, 2024	Regional Non-Deal Roadshow with CGS International
March 4, 2024	EFG one-on-one Conference Forum with EFG Hermes
March 6, 2024	Mandiri Investment Forum
April 15 - 19, 2024	Europe Non-Deal Roadshow with UBS Global Securities
May 6 - 8, 2024	Local Non-Deal Roadshow with BNI Sekuritas
13 - 14 May 2024	Macquarie Asia Conference 2024
June 10, 2024	Macquarie Asean Banks Day Tour
June 13, 2024	CLSA Asean Forum
August 27, 2024	Public Expose Live 2024
August 28, 2024	Macquarie ASEAN Conference 2024
September 23 - 27, 2024	Europe Non-Deal Roadshow with UBS Global Securities
September 25, 2024	UBS Mid Caps Day 2024
October 23 - 25, 2024	Regional Non-Deal Roadshow with UBS Global Securities
October 28 - 29, 2024	Australia Non-Deal Roadshow with UBS Macquarie Securities
November 5, 2024	Site Visit Investor
November 7, 2024	Nomura Verdhana Indonesia Conference 2024
December 11 - 12, 2024	Local Non-Deal Roadshow BRI Danareksa Sekuritas

Throughout 2024, the Company has fulfilled offline and online conference calls from capital market communities, some involving the Board of Directors or the Investor Relations unit.

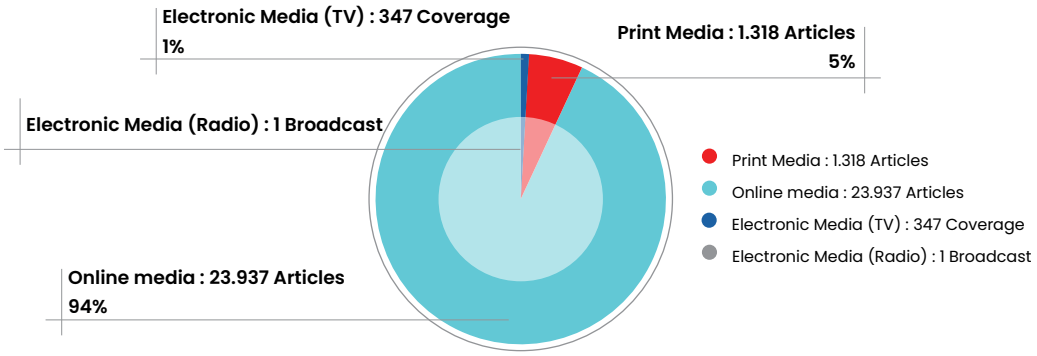
Participant	Number of Activi-ties
Analyst	84
Local Investors	58
Foreign Investors	103
Rating Agency	3
Total	**248**

The Investor Relations Unit periodically submits reports on the development of the Company's shares, including unusual market activities, and reports related to inputs, responses and expectations of investors, analysts and other capital market communities towards the Company's business development and performance improvement.

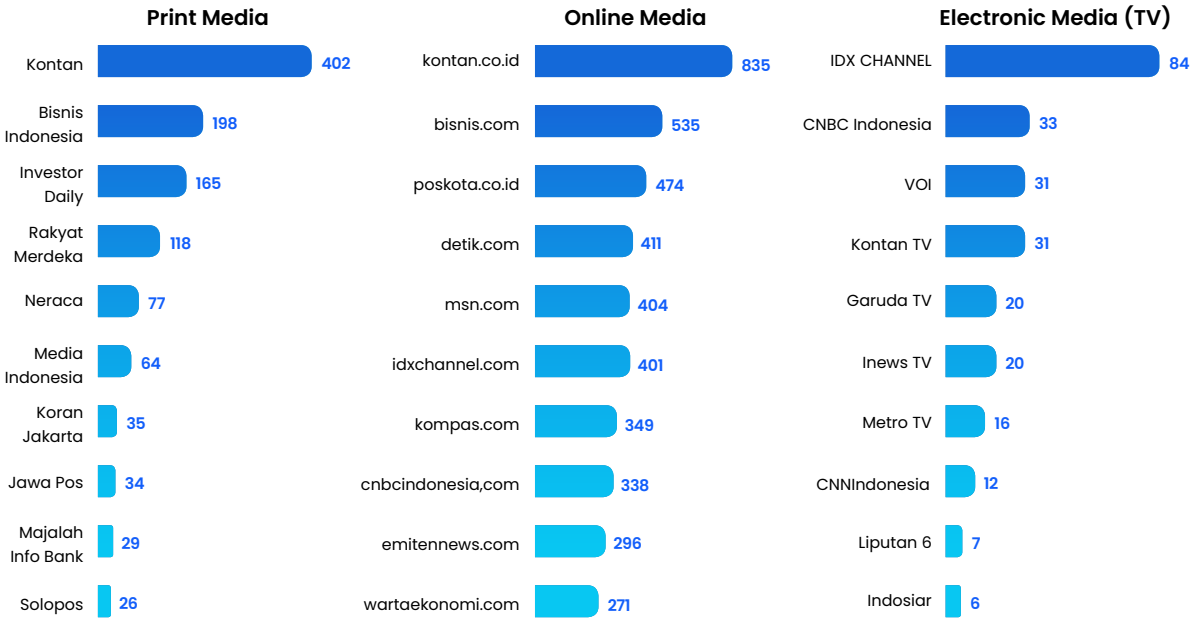
Media Exposure

From January to December 31, 2024, the company got wide positive media coverage in print, online, and electronic mass media. Throughout the year, the Company has distributed 107 (a hundred and seven) press releases to mass media and 88 (eighty-eight) official photo news sent to the press. Therefore in the same period, the company got high exposure with more than 25.603 media coverage and 24.600 from the whole coverages are positive coverage. In total, 94% of the coverage was published by online media such as Kompas.com, kontan.co.id, bisnis.com, poskota.co.id, and detik.com.

Distribution of BTN News Media Categories



TOP 10 BTN Media



Press Release

No.	Date	Title
1.	January 5, 2024	With Rp 174 Million Prize, BTN Holds Journalism and Photo Awards Ahead of 74th Anniversary.
2.	January 7, 2024	Collaborating with AMC, Bank BTN Successfully Cuts Nearly IDR 900 Billions of NPL
3.	January 8, 2024	35 Years Mortgage Scheme Will Offer Convenience for Millennials and Gen Z
4.	January 9, 2024	Strong Commitment to Implement ESG, Bank BTN Excels in Sustainable Transformation
5.	January 15, 2024	Encouraging the Implementation of ESG, Bank BTN Becomes a Member of United Nations Environment Programme Financial Initiative (UNEP FI)
6.	January 24, 2024	BTN Syariah Assets Are Expected To Exceed Idr 50 Trillion
7.	January 25, 2024	BTN Projects That the Property Sector in 2024 Will be Bright
8.	January 26, 2024	Launching the Travel Xperience Program, BTN Targets Priority Customer Funds to Reach IDR 57 Trillion
9.	January 30, 2024	BTN Projects 12 Percent Growth in Home Sales
10.	February 2, 2024	From Gen Z to Entrepreneurs Can Now Afford Houses with Syariah Scheme
11.	February 2, 2024	BTN's Steps in the Mission of Saving Bank Muamalat are Worth Appre-ciating
12.	February 4, 2024	BTN has Distributed IDR 52 Trillion to Informal Sectors
13.	February 6, 2024	Celebrating 74th Anniversary, BTN Launch "Serba 74" Promo
14.	February 12, 2024	A Successful Transformation, BTN Gains IDR 3.5 Trillion Profits
15.	March 3, 2024	Coming Up with New Logo, BTN Gains More Confident
16.	March 6, 2024	BTN'S Annual Agm Shares Idr 700.19 Billion Dividend
17.	March 9, 2024	LAUNCHING CONTACTLESS VISA DEBIT CARD, BTN IS OPTIMIST TO REACH 20% TRANSACTIONS
18.	March 10, 2024	The Jakarta International Marathon 2024 Will Be Held on the DKI Jakarta Anniversary Date
19.	March 13, 2024	Launching 4 New Features, BTN Mobile Gets More Ambitious This Year
20.	March 22, 2024	Aiming At The Emerging Affluent Segment, BTN Launches BTN Prospera
21.	March 26, 2024	BTN Held State-Owned Enterprise (BUMN) Safari Ramadhan 2024 Pro-gram
22.	March 27, 2024	Welcoming Eid, BTN Prepares Idr 39.44 Trillion Cash Supply
23.	March 28, 2024	BTN Supports Flood Victims in Central Java
24.	April 3, 2024	BTN Board of Directors Held Safari Ramadan Simultaneously in Various Regions
25.	April 17, 2024	Accelerating Employee Development, BTN Ranks in the Top 3 for Career Development
26.	April 25, 2024	In Quarter I - 2024, BTN Credit Distribution and Financial Performance Reached IDR 344.2 Trillion
27.	April 26, 2024	Collaborating With Corruption Eradication Commission (Kpk), Btn Strengthens Employee Family Integrity
28.	May 2, 2024	Celebrating Kartini Day: BUMN Srikandi Conduct Education Session Re-garding Property Investment
29.	May 5, 2024	Consistently Carrying Out Its Role, BTN Wins Best Savings Bank Award
30.	May 8, 2024	Come Across the Potentials of Property Industry in Cirebon, BTN Relo-cates its Branch Office
31.	May 8, 2024	Due To Fraudulent Investments In Btn, Ombudsman Invites The Financial Service Authority (Ojk), Indonesia Deposit In-Surance Corporation (Idic), And The Ministry Of State-Owned Enterprises (Bumn)
32.	May 21, 2024	Encouraging non-subsidized mortgage (KPR), BTN Officially Opens Three Sales Centers in Three Big Cities.
33.	May 22, 2024	Driving the Revolution Through AI, BTN Maximizes Digital Transfor-mation and Focuses on Customer-Centricity
34.	May 24, 2024	Collaborating with Volunteers from Bakti BUMN, BTN Fights Bullying
35.	May 26, 2024	BTN Syariah Recognized as Indonesia's Best Domestic Islamic Bank
36.	May 30, 2024	BTN Aims Business Development Potentials in ITS
37.	June 10, 2024	BTN Wins 2 Awards for Best Corporate Emission Reduction Transparency 2024
38.	June 11, 2024	BTN JAKIM 2024 Proud to Get the title World Athletics Label Road Races
39.	June 4, 2024	Runners High Enthusiasms Got BTN JAKARTA INTERNATIONAL MARA-THON (JAKIM) 2024 Tickets Sold Out

No.	Date	Title
40.	June 5, 2024	The President Appreciates BTN's Involvement In Building The Future Of The Nation In Indonesia's New Capital City (Ikn)
41.	June 13, 2024	BTN Prepares Strong Human Resources in IT to Face the Development of AI Technology
42.	June 13, 2024	For a Healthy Jakarta, Local Government Encourages Citizens to Support the International Marathon Event."
43.	June 18, 2024	Jakarta International Marathon 2024 is On Going, See 36 Roads That Will be Closed
44.	June 18, 2024	As the Jakarta International Marathon (JAKIM) 2024 is Held, Here are the Parking Spots and Public Transportation
45.	June 19, 2024	Kemenparekraf Supports BTN JAKIM 2024
46.	June 21, 2024	BTN Jakim Racers Pick Their Race Pack Before The Closing To-Morrow
47.	June 22, 2024	Celebrating Jakarta's Anniversary, Btn Launches Qris Trans-Action Promo "Serba Idr 497" In BTN Jakim
48.	June 23, 2024	BTN Jakarta International Marathon 2024 Successfully Held
49.	June 28, 2024	BTN Takes Note On On Track Achievement Starting From May 2024
50.	June 30, 2024	Getting More Innovative, BTN Launches 3 New Feature In Btn Mobile
51.	July 4, 2024	BTN Gets the ABF Wholesale Banking Awards 2024
52.	July 4, 2024	BTN Prioritas Gain ABF Retail Banking Awards 2024
53.	July 11, 2024	BTN Embraces Young Developers to Reduce Housing Backlog
54.	July 15, 2024	Encouraging The Economic Growth At Pidie, BTN Opens The Syariah Office Branch
55.	July 19, 2024	BTN Gains Euromoney Awards For Exellence 2024
56.	July 23, 2024	ID FOOD Collaborates with BTN to Tackle Stunting Issue
57.	July 25, 2024	Financial Performance in Semester I/2024: Credits and Financing in BTN Reach IDR 352 Trillions
58.	July 29, 2024	Winning the Asean Risk Champion Award 2024, BTN Outstands Asean Corporations In Risk Management
59.	July 31, 2024	Boosting Credit Distribution, BTN Held A Mass Credit Agree-Ment
60.	August 2, 2024	BTN Syariah and PP Muhammadiyah Strengthen Their Collaboration
61.	August 15, 2024	Consistently Applying Sustainable Banking, BTN Win Esg Initia-Tives Awards (Eia) 2024
62.	August 23, 2024	Developing Property Potential In Sumatera, BTN Invites Stu-Dents In Pekanbaru To Become Developers
63.	August 27, 2024	On Track Pergormance, A New Scheme Of Subsidy Is Required To Reduce The Housing Backlog
64.	August 29, 2024	BTN Spares Financing Support For 150.000 Low-Emission Houses
65.	August 29, 2024	Improving efficiency and transparency, BTN Implements E2E Procure-ment
66.	September 4, 2024	National Customer Day: BTN Improves Its Service As Transac-Tional Bank
67.	September 7, 2024	BTN Gets High Appreciation as Encouraging the Rumah Murah (Cheap Housing) Program Despite the Increase of BI Rate
68.	September 11, 2024	To Improve the Services, BTN Expands Network to Campuses
69.	September 13, 2024	In August 2024, BTN Notes on Credit Distribution as Committed
70.	September 26, 2024	BTN and Syailendra Capital Collaborates and Launch 2 Reksa Dana Unggulan Products in BTN Mobile Feature and Distributed by BTN Pro-fessional Staff
71.	September 27, 2024	From 2020-2024, BTN Assets Increases By 26%
72.	September 29, 2024	Leading In Creativity And Esg Innovation, BTN Wins The Idea-Ward 2024
73.	September 30, 2024	BTN Mobile App, A Pioneer in Mortgage digitalization in Indonesia with Integrated House Searching feature

No.	Date	Title
74.	October 7, 2024	To Improve the MSME Kriya Sector, the State-Owned Enterprise Busi-ness (BUMN) Held "BerKRIYAsi" in Jakarta and Makassar
75.	October 9, 2024	Wins the ARA 2023, BTN Rank Increases
76.	October 15, 2024	Encouraging BUMN to be Super Learner, BTN Commits to Provides High Quality Human Resources
77.	October 16, 2024	Collaborating With Amartha, BTN Expands Financial Support For Msme
78.	October 17, 2024	BTN Offer 74% Discount In "Umkm Bekriyasi" Bazaar In Sarinah
79.	October 17, 2024	Genjot Pembiayaan Perumahan
80.	October 17, 2024	Improving Human Resource Quality, BTN Creates Learning Center in Bandung
81.	October 18, 2024	Networking with Quality Talents, BTN Strengthens its Partnership with Top Universities
82.	October 18, 2024	Proposing the Ecofriendly Concept, BTN Conducted Groundbreaking in Gandul Ecopark
83.	October 19, 2024	A Complete Support Kit from BTN to MSME, from Financing to BUMN MSME Bazaar in Sarinah
84.	October 20, 2024	3 Million Homes Program Boosts Economy, People Have More Chance to Own a House
85.	October 23, 2024	Overseeing 3 Million Houses Program, BTN And Unnes Col-Laborates To Prepare High Quality Human Resources In Digital Era
86.	October 24, 2024	"BerKRIYAsi" event in Makassar Shows BTN Consistency in Supporting the Development of MSME
87.	October 24, 2024	BTN is Committed to Protect Personal Information of Its Customers
88.	October 29, 2024	Gojek Driver Partners in Bogor, Yogyakarta, dan Semarang have Their Dream House
89.	November 5, 2024	Supported by KPR, BTN is Optimistic that Credit Growth is on Target
90.	November 7, 2024	BTN and UNTAN Strengthen Strategic Collaboration to Reach Indonesia Emas 2045
91.	November 8, 2024	To 3 Ministers, BTN Board Of Directors Presented The Solution Of 3 Million House Program Achievements
92.	November 12, 2024	Innovative In Esg Leads BTN To Win The Global Retail Banking Innovation Awards 2024
93.	November 13, 2024	Aiming to the Emerging Affluent Segment, BTN Launches BTN Prospera Debit Card
94.	November 14, 2024	Targeting Cheap Funds, BTN Partners with UPN Veteran Yogyakarta
95.	November 19, 2024	Cost of Funds Still High, Banks Experience Profit Pressure
96.	November 22, 2024	Implementing Esg Champion, BTN Got Green Building CertifiCation
97.	November 26, 2024	To Boost Innovation in Housing Business, BTN Held Housingpreneur Competition
98.	November 29, 2024	High Cost Of Fund Causes BTN Credits And Third-Party Funds Grow Above The Industry
99.	November 29, 2024	3 Million House Program Got Support Across Ministries
100.	December 10, 2024	Celebrating KPR 48Th Anniversary, BTN Offers 3.48% Interest
101.	December 12, 2024	Ara, the Minister of Housing and Residential Areas Compliments the Ministry of State-Owned Enterprises (BUMN), Within 2 Months of Prabowo's Governmental Period, 30.000 House Units Financial Has been Distributed.
102.	December 13, 2024	Near Christmas and New Year, BTN Provides Cash as Many as IDR 20.37 Trillions
103.	December 15, 2024	Celebrating KPR 48Th Anniversary, BTN Held Bale (Super App) Soft Launching
104.	December 15, 2024	Dahsyat Baru 2 Bulan, Pemerintahan Prabowo Sudah Salurkan Pem-biayaan 30.000 Unit Rumah Gebrakan 2 Bulan Pemerintahan Prabowo, Salurkan Pembiayaan 30.000 Unit Rumah
105.	December 27, 2024	Going on with the Transformation, BTN Improves the Human Resource Quality using the AI
106.	December 30, 2024	BTN Syariah Embraces Sun Life Indonesia And Launched Salam Berkah Amanah Insurance
107.	December 31, 2024	A Solid Performance, BTN Records Credits and Third Party Fund (DPK) Increases in November 2024

Media Briefing/Press Conference

No.	Month	Activity	Media Briefing and Press Conference Theme Title
1.	February 12, 2024	Press Conference on 2023 Performance Presentation	Successful Transformation, BTN Records IDR 3.5 Trillion Profit
2.	March 3, 2024	Press Conference: Launching of New Logo	BTN Launches New Logo
3.	March 6, 2024	Press Conference: AGMS Results	BTN Agms Distributes Idr 700.19 M Dividend
4.	March 9, 2024	Press Conference: BTN Jakim 2024	BTN Jakim 2024 Ready To Implement 3S
5.	March 22, 2024	Press Conference: BTN Prospera Launched	BTN Prospera Launched, Targetting Idr 8 Trillion In Cheap Funds
6.	April 4, 2024	Breaking Fast with Managing Editor	Help Reduce Backlog, Btn Proposes New Scheme For Subsidized Mortgage
7.	May 8, 204	Press Conference on Ombudsman and BTN Explanation Regarding Customer Fund Claims	BTN Invites Customers To Take Legal Course
8.	June 23, 2024	Press Conference on the Implementation of BTN Jakim 2024	BTN Jakim 2024 Successful
9.	August 27, 2024	Public Expose Online public expose activity with idx and media	Performance On Track New Subsidy Scheme Needed To Reduce Housing Backlog
10.	August 29, 2024	Media Coverage & Doorstep Groundbreaking of Low Emission Houses in Bekasi, West Java	BTN Prepares Financing Support For 150,000 Low-Emission Houses
11.	September 26, 2024	Launch and Press Conference of BTN and Syailendra Capital Cooperation	BTN-Syailendra Capital Synergy, Presents Two Leading Mutual Fund Products
12.	November 8, 2024	Coverage and Doorstep with Three Ministers, BTN President Director Explains Solutions to Achieve 3 Million Houses Program	Together With Three Ministers, BTN's Director Explains Solutions To Achieve The Three Million Houses Program
13.	November 29, 2024	Coverage and Doorstep Cross-Ministry Dialogue for 3 Million Houses Program	The 3 Million Houses Program Gets Cross-Ministry Support
14.	December 12, 2024	Coverage and Doorstep of Mass KPR Contract in Pondok Taktakan Banten	Minister Ara Praises Ministry Of Soes, In 2 Months Of Prabowo Government BTN Distributes 30,000 Mortgage Units
15.	December 13, 2024	Media Briefing Sneak Peak Bale By BTN	Availability of Natanru Holiday Cash
16.	December 15, 2024	Coverage and Doorstep of KPR Anniversary -48	BTN Holds Soft Launching of Bale

Bulletin

Volume	Theme
Paras I Edition 2024	Bank BTN New Spirit
Paras II Edition 2024	A Home for Best Talents in Indonesia
Paras III Edition 2024	BTN ESG Strategy in Creating Harmony
Paras IV Edition 2024	BTN Towards 3 Million House Program of Asta Cita

Transparency In Report Submission

The Company fulfills its obligations to Stakeholders and OJK in accordance with the provisions, including related to transparency and publication of financial and non-financial conditions as follows:

- Other information aimed at supporting information disclosure, financial education and services to the public BTN Financial Literacy and Inclusion
- Report on the Implementation of Financial Literacy and Inclusion Activities in 2024: reported every semester.

During 2024, various Financial Literacy and Inclusion activities that had been reported to the regulators (BI and OJK) were as followS:

No.	Period (Month)	Province	Regency/City	Activity	
				Activity Name	Type of Activity
1.	January	The Special Capi-tal Region of Jakarta	Administrative City of Central Jakarta	Market Outlook 2024 (Jakarta)	Conventional
2.	January	East Java	Surabaya City	Market Outlook 2024 (Surabaya)	Conventional
3.	March	Central Java	Sukoharjo Regency	Hajj Planning Education from an Early Age	sharia
4.	March	East Java	Malang City	Financial Education for debtors / prospective debt-ors who are members of the MSME entrepreneur association	Conventional
5.	February	South East Sula-wesi	Baubau City	Financial Planning for Investment in Preparation for Retirement	Conventional
6.	June	The Special Re-gion of Yogyakar-ta	Yogyakarta City	Financial Planning for Investment in Preparation for Retirement - Socialization of Financial Services and Asabri Program	Conventional
7.	June	East Java	Jember Regency	Socialization of Financial Literacy for Lecturers and Employees of the University of Jember Education Institute	Conventional
8.	February	The Special Capi-tal Region of Jakarta	Administrative City of Central Jakarta	Socialization of Financial Literacy for Lecturers and Employees of UIN Jakarta Educational Institutions	sharia
9.	February	North Maluku	Ternate City	Socialization of financial management for students receiving Indonesia Smart College Card (KIPK)	
10.	March	The Special Capi-tal Region of Jakarta	Administrative City of North Jakarta	KCP Agung Sedayu Status Improvement (Office Network Addition)	Conventional
11.	June	West Java	Bekasi Regency	Outlet Relocation (Office Network Addition)	Conventional
12.	June	Banten	Serang Regency	Outlet Relocation (Office Network Addition)	Conventional
13.	June	East Java	Banyuwangi Regency	Outlet Relocation (Office Network Addition)	Conventional
14.	June	Central Java	Klaten Regency	Outlet Relocation (Office Network Addition)	Conventional
15.	June	North Maluku	Ternate City	Outlet Relocation (Office Network Addition)	Conventional
16.	June	West Java	Karawang Regency	Outlet Relocation (Office Network Addition)	Conventional
17.	June	Central Java	Semarang Regency	Outlet Relocation (Office Network Addition)	Conventional
18.	June	West Java	Karawang Regency	Outlet Relocation (Office Network Addition)	Conventional
19.	September	The Special Capi-tal Region of Jakarta	Administrative City of West Jakarta	Early Hajj Saving Education for Kindergarten Chil-dren at KCP BTN Syariah Jakarta Kebon Jeruk	sharia
20.	September	The Special Capi-tal Region of Jakarta	Administrative City of Central Jakarta	Ministry of Finance UMKM Bazaar	Conventional
21.	September	The Special Capi-tal Region of Jakarta	Administrative City of South Jakarta	Socialization of Hajj and Umrah programs & indi-vidual sharia investments SMPN 104	sharia
22.	September	Banten	Tangerang Regency	Financial Education to Majels Ta'lim Tangerang	Conventional

No.	Period (Month)	Province	Regency/City	Activity	
				Activity Name	Type of Activity
23.	September	The Special Capi-tal Region of Jakarta	Administrative City of North Jakarta	Socialization of Purwaganda	Conventional
24.	September	The Special Capi-tal Region of Jakarta	Administrative City of Central Jakarta	Literacy Party at Taman Ismail Marzuki	Conventional
25.	September	The Special Capi-tal Region of Jakarta	Administrative City of North Jakarta	MSME Socialization at Fresh Market PIK	Conventional
26.	September	Banten	South Tangerang City	Financial Socialization at Trek Mandone Gen 8 Showcase Event	Conventional
27.	September	Banten	South Tangerang City	Socialization to the Public, Notary Community & BPN at Jawara RUN 2024	Conventional
28.	September	West Java	Bogor City	Socialization of Kawungluwuk Savings	Conventional
29.	September	West Java	Depok City	Socialization of Savings at SDIT An Nahl	Conventional
30.	September	West Java	Bogor City	Socialization of QRIS to MSMEs	Conventional
31.	September	West Java	Bogor Regency	Socialization of Future Preparation Savings	Conventional
32.	September	The Special Capi-tal Region of Jakarta	Administrative City of East Jakarta	Socialization of Savings at the Subdistrict Office	Conventional
33.	September	The Special Capi-tal Region of Jakarta	Administrative City of East Jakarta	Socialization of Savings, Credit, and Cashless Pay-ments	Conventional
34.	September	Central Java	Semarang Regency	Socialization of Savings at LabSchool UNW Ungar-an	Conventional
35.	September	Central Java	Semarang Regency	Socialization of Savings at UNAKI	Conventional
36.	September	East Java	Malang City	Financial Management Socialization with the Ma-lang Big Market Traders Association (P3BM)	Conventional
37.	September	East Java	Surabaya City	Financial Socialization with Developer Partners	Conventional
38.	September	East Java	Banyuwangi Regency	Financial Socialization with Banyuwangi Prison Officers	Conventional
39.	September	East Java	Madiun City	Financial Socialization with PDAM Madiun	Conventional
40.	September	East Java	Malang City	Socialization of QRIS & BPJS	Conventional
41.	September	East Java	Mojokerto City	Socialization of Saving Habits	Conventional
42.	September	West Java	Bekasi Regency	Financial Education and Banking System Regula-tion for Students of MM2100 Industrial Partners	Conventional
43.	September	West Java	Bekasi City	Socialization of QRIS Usage as a Payment System at the SD Al-Azhar 23 Jatikramat Canteen	Conventional
44.	September	West Java	Karawang Regency	Socialization of QRIS Usage as a Payment System at the UNSIKA Business Center Canteen	Conventional
45.	September	South East Sula-wesi	Kendari City	Beauty Contest for BLU (Public Service Agency)	Conventional
46.	September	North Maluku	Ternate City	Socialization of Financial Management	Conventional
47.	September	Maluku	Ambon City	Socialization of Transactional Ease Using Bank Accounts and Payment Methods for Education Fees	Conventional
48.	September	Bengkulu	Bengkulu City	Socialization of Fund and Financing Products at the Women's Correctional Facility Class II B Bengkulu	sharia
49.	September	Riau	Pekanbaru City	Socialization of Fund and Financing Products	sharia
50.	September	Riau	Pekanbaru City	Socialization of Fund and Financing Products	sharia
51.	September	East Java	Surabaya City	Audience with the Surabaya District Court	Conventional
52.	September	The Special Capi-tal Region of Jakarta	Administrative City of Central Jakarta	Kompas Gramedia Cup – Kompas Gramedia Cup Sports Area, Palmerah Selatan	Conventional

No.	Period (Month)	Province	Regency/City	Activity	
				Activity Name	Type of Activity
53.	September	The Special Capi-tal Region of Jakarta	Administrative City of Central Jakarta	Sharing Session with the Government Investment Center	Conventional
54.	September	The Special Re-gion of Yogyakar-ta	Yogyakarta City	Workshop on Open Banking with UNS	Conventional
55.	September	The Special Capi-tal Region of Jakarta	Administrative City of South Jakarta	Smart Investment Talk	Conventional
56.	September	East Kalimantan	Balikpapan City	Outreach Program - BTN Greets	Conventional
57.	September	Central Kaliman-tan	Palangkaraya City	Outreach Program - Socialization of KUR with KADIN KALTENG	Conventional
58.	September	East Kalimantan	Samarinda City	Outreach Program - Socialization of MLT Program with BPJS TK for Mining Employees	Conventional
59.	September	East Kalimantan	Balikpapan City	Outreach Program - Socialization of MLT Program with BPJS TK for Doctors & Nurses	Conventional
60.	September	South Kaliman-tan	Banjarbaru City	Outreach Program - BTN Greets	Conventional
61.	Sept mber	South Kaliman-tan	Banjarbaru City	Socialization with APJI DPC Banjarbaru	Conventional
62.	September	West Kalimantan	Pontianak City	BTN Greets - Socialization with MSMEs	Conventional
63.	September	Central Kaliman-tan	Palangkaraya City	BTN Greets - Outreach Program for MSMEs	Conventional
64.	September	Central Kaliman-tan	Palangkaraya City	Socialization of MLT Program with PT Borneo Makmur Lestari	Conventional
65.	September	West Kalimantan	Pontianak City	BTN Greets - Socialization with MSMEs	Conventional
66.	September	West Kalimantan	Pontianak City	BTN Greets - Socialization with MSMEs	Conventional
67.	September	South Kaliman-tan	Banjarbaru City	Socialization with HIPMI Kalsel Province - Discus-sion on Musda Sponsors and MOU	Conventional
68.	September	East Kalimantan	Samarinda City	Socialization of MLT Program and Bank Products with Employees of PT Buran Nusa Respati	Conventional
69.	September	South Kaliman-tan	Banjarbaru City	Socialization with the Employee Cooperative of PT Adaro Indonesia in Tanjung City	Conventional
70.	September	East Kalimantan	Samarinda City	Socialization with DPC Hiswana Migas Samarinda	Conventional
71.	September	East Kalimantan	Samarinda City	Socialization of MLT Program and Bank Products with Employees of PT Multindo Prima Teknik	Conventional
72.	September	East Kalimantan	Samarinda City	Outreach Program - BTN Greets	Conventional
73.	September	South Kaliman-tan	Banjarmasin City	Socialization of MLT with BPJS Employment at PT Indonesia Prima Equipment	Conventional
74.	September	South Kaliman-tan	Banjarmasin City	Socialization of MLT with BPJS Employment at Hotel Galaxy	Conventional
75.	September	Central Kaliman-tan	Palangkaraya City	New Student Acceptance at SD Percobaan	Conventional
76.	September	South Kaliman-tan	Banjarmasin City	PKKMB at Kalimantan Polytechnic	Conventional
77.	September	South Kaliman-tan	Banjarmasin City	Socialization of Products and Savings to SMAN 10 Banjarmasin	Conventional
78.	September	South Kaliman-tan	Banjarmasin City	Socialization of Products and Savings to SMK ISPI Kayutangi	Conventional
79.	September	South Kaliman-tan	Barito Kuala Regency	Socialization of Products and Savings to SMPN 1 Alalak	Conventional
80.	September	Maluku	Kota Ambon City	Socialization of Products and Savings to UT Ambon Students	Conventional
81.	September	National		Education on Fraud Methods	Conventional
82.	September	National		Education on Saving and Investment	Conventional
83.	September	National		BTN Marketbeat Edition September 2024	Conventional

No.	Period (Month)	Province	Regency/City	Activity	
				Activity Name	Type of Activity
84.	September	East Java	Banyuwangi Regency	Socialization of KUMK & KUR to BPJS PKFI Banyuwangi Clinic	Conventional
85.	September	East Java	Banyuwangi Regency	Socialization of KUMK & KUR to BPC Gapensi	Conventional
86.	September	East Java	Banyuwangi Regency	Socialization of KUMK & KUR to SRC Banyuwangi Community	Conventional
87.	September	Riau Archipelago	Batam City	Seminar HIPMI Fest Batam Vol.3 Rising Star of Economic 2045	Conventional
88.	September	Riau Archipelago	Batam City	Serbu Perumahan dan Warung (SARUNG) SCPU Team	Conventional
89.	September	Riau Archipelago	Batam City	SME Program: Kamis Laris	Conventional
90.	September	Lampung	Bandar Lampung City	KUR Serbu CFD (Car Free Day)	Conventional
91.	September	Lampung	Bandar Lampung City	Bigland Partner Gathering	Conventional
92.	September	South Sumatera	Palembang City	Pusri Investment Week	Conventional
93.	September	South Sumatera	Palembang City	Apersi Housing Expo at Palembang Square Mall	Conventional
94.	September	Riau Archipelago	Bintan Regency	Training on Marketing & Digitalization for Tourism MSMEs at Hotel Hello Bintan	Conventional
95.	September	Jambi	Jambi City	Socialization of KUR & Merchant Acquisition at Jambi University	Conventional
96.	October	East Kalimantan	Balikpapan City	FinExpo 2024 Seminar & Talkshow - Cuan Terus with Bale by BTN	Conventional
97.	October	East Kalimantan	Balikpapan City	FinExpo 2024 - Open Booth by BTN	Conventional
98.	October	East Kalimantan	Balikpapan City	Sharia Financial Fair (Syafif)	sharia
99.	September	Banten	Tangerang Regency	Socialization of Saving Culture from an Early Age to Kiddy Mind Cisauk Kindergarten Students and Parents	Conventional
100.	September	Banten	Tangerang Regency	Saving Week at Al-Hanif Islamic Kindergarten	Conventional
101.	September	South Kalimantan	Tanah Laut Regency	Socialization of Savings to Students & Teachers of SMPN 2 Pelaihari	Conventional
102.	September	South Kalimantan	Tanah Laut Regency	Socialization of Savings to Students & Teachers of SMPN 1 Jorong	Conventional
103.	September	South Kalimantan	Banjarmasin City	Socialization of Savings to Students & Teachers of SMPN 12 Banjarmasin	Conventional
104.	September	National		Opening of BTN Syariah Savings Accounts	sharia
105.	September	National		Consumer Financing Distribution (Sharia Mortgage & Secured Financing)	sharia
106.	September	National		Consumer Financing Distribution (Sharia Subsidized Mortgage)	sharia
107.	September	National		Commercial Financing Distribution BTN Syariah	sharia
108.	September	Aceh	Banda Aceh City	Socialization of Hajj Planning	sharia
109.	September	East Java	Malang City	Santri Services - MAN 1 Malang	sharia
110.	September	South Sumatera	Palembang City	Introduction of Sharia Products at Property Expo	sharia
111.	September	West Java	Karawang Regency	Introduction of Sharia Products at Mangkualam Asri Sakura Land Project Opening	sharia
112.	September	The Special Capital Region of Jakarta	Administrative City of Central Jakarta	Introduction of Sharia Products at Developer Gath-ering	sharia
113.	September	West Java	Bekasi City	Introduction of Sharia Products to ISPI Developer Marketing	sharia

No.	Period (Month)	Province	Regency/City	Activity	
				Activity Name	Type of Activity
114.	September	West Java	Bekasi City	Introduction of Sharia Products to Working Visit of Commission VI of the Indonesian Parliament (DPR RI)	sharia
115.	September	Central Java	Semarang City	Introduction of Sharia Products to MUSDA REI JATENG	sharia
116.	September	West Java	Bekasi City	Introduction of Sharia Products to Kalindo Land	sharia
117.	September	Central Java	Surakarta City	Introduction of Products to Developers in the Solo Area	sharia
118.	September	Banten	South Tangerang City	Introduction of Sharia Products to PT. Bintang Indo Lestari Developers	sharia
119.	September	West Java	Karawang Regency	Introduction of Sharia Products to PT. Artharaya Agung	sharia
120.	September	Banten	Serang City	Expert Lecture on Sharia Banking Department - UIN Sultan Maulana Hasanuddin	sharia
121.	September	East Java	Malang City	APERSI Goes to Campus - Muhammadiyah Univer-sity of Malang	sharia
122.	September	The Special Capi-tal Region of Jakarta	Administrative City of Central Jakarta	Developer Gathering - Pullman Hotel Jakarta	sharia
123.	September	East Java	Surabaya City	Audience with BTN Syariah x Muhammadiyah East Java Regional Management	sharia
124.	September	West Java	Ciamis Regency	Sharing of KPR Products and Hajj Preparation with PT Graha Medina Cipta at Ciamis Religious Court	Conventional
125.	September	South Kaliman-tan	Banjarmasin City	Outreach Program - BTN Greets MSMEs	Conventional
126.	September	South Kaliman-tan	Banjarmasin City	Outreach Program - BTN Greets MSMEs	Conventional
127.	September	South Kaliman-tan	Banjarmasin City	Outreach Program - BTN Greets MSMEs	Conventional
128.	September	South Kaliman-tan	Banjarmasin City	Outreach Program - BTN Greets MSMEs	Conventional
129.	September	Gorontalo	Gorontalo City	Socialization of Savings for KIPK Recipients at Gorontalo State University in 2024	Conventional
130.	September	South Sulawesi	Makassar City	Financial Education Socialization for Employees of RSIA Ananda Makassar	Conventional
131.	September	North Maluku	Ternate City	Socialization of Education Fee Payment Procedures at Khairun University	Conventional
132.	September	South East Sula-wesi	Kendari City	Financial Literacy Socialization to the Government of North Buton	Conventional
133.	October	National		BTN Market Beat Edition October 2024 (BTN YouTube)	Conventional
134.	October	National		Education on the Risks of Using Public Wi-Fi (BTN Instagram)	Conventional
135.	October	National		Education on Fraud Methods (BTN Instagram)	Conventional
136.	October	Central Java	Semarang City	Public Lecture on Overcoming Economic and Digi-tal Disruptions: Strategies for Students in this Era	Conventional
137.	October	East Java	Surabaya City	Jatim Inclusion Festival 2024	Conventional
138.	October	South Sulawesi	Makassar City	Financial Expo Sulselbar	Conventional
139.	October	Central Java	Brebes Regency	Financial Education at Brebes Regional General Hospital	Conventional
140.	October	Aceh	Banda Aceh City	Videotron Boosts BTN KCS Banda Aceh	Conventional
141.	October	National		Education on Online Loans (BTN Instagram)	Conventional
142.	October	West Java	Sukabumi City	Socialization of Savings at SMKN 1 Cibadak	Conventional

No.	Period (Month)	Province	Regency/City	Activity	
				Activity Name	Type of Activity
143.	October	West Java	Bogor Regency	Socialization of Savings at MTS Ash Sholeh	Conventional
144.	October	DKI Jakarta	Kota Adm. Jakarta Utara	MAG RUN 2024	Conventional
145.	October	Banten	Kota Tangerang	Socialization of KAR, KUR, Savings, and E-deposito at Balaraja Regional General Hospital	Conventional
146.	Oct ber	Banten	Kota Tangerang	Socialization of Champion Savings at Al Hikmah Foundation Students	Conventional
147.	October	The Special Capi-tal Region of Jakarta	Administrative City of West Jakarta	Socialization of Simple Savings at the School Committee and Parents of SD Srengseng 5, West Jakarta by Puri CBD KCP	Conventional
148.	October	The Special Capi-tal Region of Jakarta	Administrative City of West Jakarta	Saving Together at SD Srengseng 5 School	Conventional
149.	October	Central Java	Pekalongan City	Socialization of Champion Savings at ITS NU Pek-alongan	Conventional
150.	October	Central Java	Kudus Regency	Socialization of Police Pensioner Savings in Pur-wodadi	Conventional
151.	October	Central Java	Kudus Regency	Socialization of Financial Digitalization to NU Ad-ministrators	Conventional
152.	October	Central Java	Kudus Regency	Socialization of Financial Digitalization to PN Ku-dus	Conventional
153.	October	Banten	South Tangerang City	Socialization of Savings to Students at SMK Sasmita Jaya Banten	Conventional
154.	October	West Java	Depok City	Opening QRIS Accounts & Socialization of QRIS Monitoring, and Payment Gateway VA in Stages	Conventional
155.	October	DKI Jakarta	City of Jakarta Adm.	Socialization of Savings, QRIS, EDC, and KUR at the Mitra Gathering Event by Kompas Gramedia	Conventional
156.	October	Central Java	Magelang City	Financial Education & Savings "Juara" to Students of Stimik Bina Patria Magelang	Conventional
157.	October	Central Java	Banyumas Regency	Education & Account Opening for Students in Pur-wokerto	Conventional
158.	October	The Special Capi-tal Region of Jakarta	Administrative City of Central Jakarta	Videotron Campaign at KCS BTN Harmoni	Conventional
159.	October	The Special Capi-tal Region of Jakarta	Administrative City of South Jakarta	Videotron Campaign at Bintaro	Conventional
160.	October	The Special Capi-tal Region of Jakarta	Administrative City of North Jakarta	Manage Your Finances at Sekolah Ekumene Chris-tian High School	Conventional
161.	October	The Special Capi-tal Region of Jakarta	Administrative City of West Jakarta	Socialization of Savings "Juara" and Olob at SMK Assa'adatul Abdiyah	Conventional
162.	October	Banten	Tangerang Regency	Signing of PKS (Cooperation Agreement) between the Ministry of Religious Affairs and the Madrasah Education Section	Conventional
163.	October	The Special Capi-tal Region of Jakarta	Administrative City of Central Jakarta	Socialization of Savings, QRIS, and KPR at the Sales Gathering of Relife Property, Astana Group	Conventional
164.	October	The Special Capi-tal Region of Jakarta	Administrative City of South Jakarta	Financial Literacy - Ngobrol Pintar (Smart Talk) on Investments by the Deposit Insurance Corporation (LPS)	Conventional
165.	September	North Sumatera	Medan City	Socialization of Fund Products and Financing at TK Khalifah Medan	sharia
166.	September	North Sumatera	Medan City	Socialization of Fund Products and Financing at PTPN Regional Office 4, North Sumatra Province	sharia
167.	September	North Sumatera	Medan City	Socialization of Fund Products and Financing at Bappelitbang, North Sumatra Province	sharia

No.	Period (Month)	Province	Regency/City	Activity	
				Activity Name	Type of Activity
168.	October	North Sumatera	Medan City	Audiences with the Stabat District Court	Conventional
169.	October	West Java	Garut Regency	Audiences with the Garut District Court	Conventional
170.	October	The Special Capi-tal Region of Jakarta	Administrative City of West Jakarta	Audiences with the West Jakarta District Court	Conventional
171.	October	West Java	Bogor Regency	Mini Bank at SMK Negeri 1 Bojong Gede	Conventional
172.	October	West Java	Bogor Regency	Mini Bank at SMK Wirabuana 1 Citayam	Conventional
173.	November	National		Financial Education for Supporting Partners of Credit/Financing (Notary/PPAT and KJPP Partners)	Conventional
174.	November	West Sumatera	Pariaman City	GENCARKAN: Financial Planning and Management at the University of West Sumatra	Conventional
175.	November	Jambi	Sarolangun Regency	GENCARKAN: Socialization on Avoiding Loan Sharks and Illegal Online Loans, and Protecting Personal Data	Conventional
176.	November	West Sumatera	Pariaman City	Socialization of Fund Products and Financing at the University of West Sumatra	Conventional
177.	November	North Maluku	Ternate City	Socialization Related to Banking at SMKN 1 Ter-nate	Conventional
178.	November	The Special Re-gion of Yogyakar-ta	Sleman Regency	Socialization of Children's Savings Early On to Stu-dents at Green School Yogyakarta Day 1	Conventional
179.	November	The Special Re-gion of Yogyakar-ta	Sleman Regency	Socialization of Children's Savings Early On to Stu-dents at Green School Yogyakarta Day 2	Conventional
180.	November	The Special Re-gion of Yogyakar-ta	Sleman Regency	Socialization of Financial Management to Students at UPN Veteran Yogyakarta	Conventional
181.	November	The Special Capi-tal Region of Jakarta	Administrative City of Central Jakarta	Socialization of Financial Management at the Uni-versity of Prof. Dr. Moestopo	Conventional
182.	November	West Java	Bogor Regency	Socialization of Financial Management at SMP N 1 Gunung Putri	Conventional
183.	November	West Java	Depok City	Socialization of Digital Payment Systems (QRIS) to CGE Traders	Conventional
184.	November	West Java	Bogor Regency	Socialization of Saving to Students at SDN Bojong 2	Conventional
185.	November	The Special Capi-tal Region of Jakarta	Administrative City of Central Jakarta	Socialization of Financial Management to Students at SMAN 7 Jakarta	Conventional
186.	November	The Special Capi-tal Region of Jakarta	Administrative City of North Jakarta	Saving Together at SMAN 92 Jakarta	Conventional
187.	November	The Special Capi-tal Region of Jakarta	Administrative City of East Jakarta	Saving Together at SDN 15 Klender	Conventional
188.	November	The Special Capi-tal Region of Jakarta	Administrative City of East Jakarta	Saving Together at SDN 15 Klender	Conventional
189.	November	West Java	Bogor Regency	Financial Management Socialization for Students at SMK Mulya Buana	Conventional
190.	November	Banten	Tangerang City	Financial Management Socialization for Students at SMKN 5 Tangerang City	Conventional
191.	December	Bali	Badung Regency	GENCARKAN at SMK Triatma Jaya Dalung	Conventional
192.	December	West Nusa Tenggara	Bima Regency	GENCARKAN at Universitas Nggusuwaru Bima	Conventional
193.	November	Central Java	Demak Regency	Financial Digitalization Socialization at STAI Islam-ic Centre Demak	Conventional
194.	November	Central Java	Kudus Regency	Financial Digitalization Socialization at STAI Islam-ic Centre Demak	Conventional
195.	December	West Java	Bogor Regency	Saving Awareness for Students at SMK Mulya Bu-ana	Conventional

No.	Period (Month)	Province	Regency/City	Activity	
				Activity Name	Type of Activity
196.	December	Banten	Tangerang City	Saving Awareness for Students at SMKN 5 Tange-rang City	Conventional
197.	November	The Special Capital Region of Jakarta	Administrative City of East Jakarta	Financial Literacy Socialization for Students at SMAN 167 Jakarta	Conventional
198.	November	The Special Capital Region of Jakarta	Administrative City of South Jakarta	Financial Literacy Socialization for Students at SMA Suluh Jakarta Pasar Minggu Open Booth with KCP Tebet	Conventional
199.	November	The Special Capital Region of Jakarta	Administrative City of South Jakarta	Financial Literacy Socialization for Students at SMA Suluh Jakarta Pasar Minggu Open Booth with UIN Syarif Hidayatullah	Conventional
200.	November	Banten	South Tangerang City	Sharia Ecofest 2024 at the Faculty of Economics and Business, UIN Syarif Hidayatullah	Conventional
201.	November	The Special Capital Region of Jakarta	Administrative City of Central Jakarta	Financial Literacy Socialization for Students at SMK Poncol	Conventional
202.	November	The Special Capital Region of Jakarta	Administrative City of East Jakarta	Financial Literacy Socialization for Students at SDN 11 Pisangan	Conventional
203.	November	The Special Capital Region of Jakarta	Administrative City of South Jakarta	Financial Literacy Socialization for Students at SMK Kemala Bhayangkari Jakarta	Conventional
204.	November	West Java	Bekasi Regency	Financial Literacy Socialization for Students at Bright Bambini Playhouse	Conventional
205.	November	The Special Capital Region of Jakarta	Administrative City of South Jakarta	Financial Literacy Socialization for Students at SMA Sumbangsih	Conventional
206.	November	The Special Capital Region of Jakarta	Administrative City of East Jakarta	Financial Literacy Socialization for Students at Event Management, FEB UNJ	Conventional
207.	November	The Special Capital Region of Jakarta	Administrative City of South Jakarta	Financial Literacy Socialization for Students at SMK Bakti Idhata	Conventional
208.	November	The Special Capital Region of Jakarta	Administrative City of South Jakarta	Financial Literacy Socialization for Students at SMPN 149	Conventional
209.	November	West Java	Depok City	Saving Money at KB/TK Montessori Depok	Conventional
210.	November	The Special Capital Region of Jakarta	Administrative City of South Jakarta	Open Booth at SMPN 149 Jakarta	Conventional
211.	November	The Special Capital Region of Jakarta	Administrative City of South Jakarta	Financial Education and Inclusion at SMK Idata Bhakti	Conventional
212.	November	Banten	Tangerang City	Saving Awareness Campaign for Students at SMK Grafika	Conventional
213.	November	Banten	South Tangerang City	BTN Solutions Socialization with PT AVIARY JAYA LESTARI	Conventional
214.	November	The Special Capital Region of Jakarta	Administrative City of North Jakarta	Enhancing Financial Literacy: Understanding Mu-tual Funds and Their Importance	Conventional
215.	November	The Special Capital Region of Jakarta	Administrative City of West Jakarta	Saving Awareness for Simple Savings, Champion, and Mobile Banking at SMK YMIK 3	Conventional
216.	November	The Special Capital Region of Jakarta	Administrative City of North Jakarta	Summarecon EXPO Event at Gapoy Mall Kelapa Gading	Conventional
217.	November	The Special Capital Region of Jakarta	Administrative City of West Jakarta	Fresh Market Event	Conventional
218.	November	The Special Capital Region of Jakarta	Administrative City of North Jakarta	Community Event at Walet Cluster PIK	Conventional
219.	November	The Special Capital Region of Jakarta	Administrative City of Central Jakarta	BTN Smart Residence Socialization	Conventional

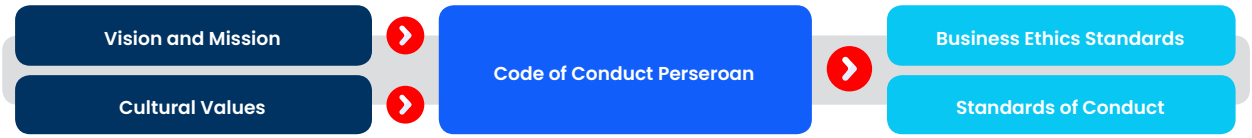
No.	Period (Month)	Province	Regency/City	Activity	
				Activity Name	Type of Activity
220.	November	The Special Capital Region of Jakarta	Administrative City of Central Jakarta	BTN Merchant Socialization	Conventional
221.	November	Banten	South Tangerang City	Education and Socialization at SMP 28	Conventional
222.	November	Banten	South Tangerang City	Education and Socialization at SMPN 2 Kelapa Dua	Conventional
223.	November	Banten	Serang City	Socialization & Education on Savings Products for SMK PGRI 1	Conventional
224.	November	Banten	Serang City	BTN Solutions Socialization with the Serang Dis-trict Court	Conventional
225.	December	West Kalimantan	Landak Regency	GENCARKAN: TJSL, Socialization on the Dangers of Online Gambling & Online Loans to Students of SMK N 1 Mandor	Conventional
226.	December	Central Kalimantan	Kapuas Regency	GENCARKAN: Socialization on Saving from an Early Age to Students at SD Katolik Santo Paulus	Conventional
227.	December	West Kalimantan	Kubu Raya Regency	GENCARKAN: Bank Goes to School: Kanaan Chris-tian School in Kubu Raya	Conventional
228.	December	Central Kalimantan	South Barito Regency	GENCARKAN: Socialization on the Dangers of Online Gambling and Online Loans to Students at MAN Barito Selatan	Conventional
229.	December	South Sulawesi	Gowa Regency	GENCARKAN: Socialization of BTN Savings SIAP! A Plan for the Future	Conventional
230.	December	Gorontalo	Gorontalo Regency	GENCARKAN: Socialization on the Dangers of Online Gambling to Students at SMA Wira Bhakti	Conventional
231.	December	South Sulawesi	Pangkajene Regency and Archipelago	GENCARKAN: BTN Solutions Socialization at the Pangkajene Religious Court	Conventional
232.	December	National		Education on Digital Fraud Schemes via Instagram by BTN	Conventional
233.	November	The Special Capi-tal Region of Jakarta	Administrative City of North Jakarta	Socialization on the Use of Virtual Accounts for Online SPP Payments with the Dirgantara Founda-tion	sharia
234.	November	The Special Capi-tal Region of Jakarta	Administrative City of West Jakarta	Hajj Planning for Teachers, Staff, and Educational Committees at Nuruzzahra	sharia
235.	October	The Special Capi-tal Region of Jakarta	Administrative City of West Jakarta	Audience with the West Jakarta District Court	Conventional
236.	December	The Special Capi-tal Region of Jakarta	Administrative City of North Jakarta	Opening of Accounts at the Director General of the Judiciary	Conventional
237.	December	West Java	Sukabumi Regency	Audience with the Sukabumi Religious Court	Conventional
238.	November	West Kalimantan	Pontianak City	Public Lecture at UNTAN (Tanjungpura University)	Conventional
239.	December	East Java	Tulungagung Regency	GENCARKAN: Digital Financial Ecosystem Man-agement and Socialization on Service Excellence & Personal Grooming for Students at UIN Sayyid Ali Rahmatullah	Conventional

Code of Conducts

The Code of Conduct is a manifestation of the Company's commitment to ensure the application of high standard GCG that refers to the best practices of credible and trusted banking institutions. Credibility and trust from the public, shareholders and customers are determining factors for the development and continuity of the Company's business. The Company's business activities must comply with applicable laws and regulations and uphold norms and ethics. Awareness of good ethics implementation will enhance and strengthen the positive image of the Company and make it recognized as a Good Corporate Citizen. Therefore, the Company always upholds its integrity by preserving and applying the Code of Conduct as the basis of the attitudes and actions of all Company personnel to work professionally and ethically by using basic principles that refer to the vision, mission, and values as well as applicable internal and external regulations.

Vision, Mission and Corporate Culture Values as The Foundation of The Code of Conduct

The Company has formulated several policies that serve as ethical and behavioral guidelines for each element of the Company in performing business activities. The Company strives to apply ethical and behavioral standards in all of its business activities in accordance with its vision, mission, and cultural values through the enforcement of the Code of Conduct.



VISION

"To be The Best Mortgage Bank in Southeast Asia by 2025 "

MISSION

1. To actively support the government in advancing the wellbeing of Indonesians through home ownership.
2. To realize the life dreamed by millions of Indonesians through the provision of a decent home.
3. To become the one of home of Indonesia's best talent.
4. To increase shareholder value by focusing on sustainable profitability growth as a blue chip company with solid risk management principles.
5. To become the financial partner to stakeholder within the housing ecosystem by providing end-to-end solutions and excellent service through digital innovation

Corporate Culture Values

Corporate culture values are reflected in the AKHLAK culture as the Company's core values and consist of 18 core behavioral guidelines as follows:

Culture Value		Main Conduct AKHLAK
Trust	Hold fast to the trust given	• Fulfill promises and commitments; • Take responsibility for the decisions, tasks and actions • taken; • Adhere to moral and ethical values.
Competent	Continue to learn to develop capabilities	• Increase self-competence to respond to ever-changing • challenges; • Help others learn; • Completing tasks of the highest quality
Harmonious	Caring for each other and respecting differences	• Respect everyone regardless of background; • Likes to help others; • Building a conducive work environment.
Loyal	Dedicated and prioritizing the interests of the nation and state	• Maintaining the good name of fellow employees, leaders, • BUMN and the State; • Willing to make sacrifices to achieve a greater goal; • Obey the Leaders as long as it does not conflict with law • and ethics.
Adaptive	Continue to innovate and be enthusiastic in moving or facing change	• Quickly adjust to become better; • Continuously making improvements following technological • developments; • Act proactively
Collaborative	Build synergies	• Providing opportunities for various parties to contribute; • Open in working together to produce added value; • Mobilizing the use of various resources for common goals.

Contents of The Code of Conduct

The Code of Conduct contains ethical and behavioral standards for the Company as a business entity and all its elements in interacting with various internal and external interested parties. The application of the Code of Conduct aims to realize ideal behaviors that develop into a work culture based on the noble values believed by the Company. The Code of Conduct is summarized into 4 chapters which are briefly described as follows:

01. Introduction	This Code of Conduct is the codification or a compilation of policies, employee regulations, and agreements that have been jointly established between the Company and employees who will influence, shape, and set forth the standards of behavior, both for Management and employees in performing all business activities. The implementation of the Code of Conduct, either Compliance or Non-Compliance, becomes one of the aspects assessed in the employee's performance appraisal. Therefore, the Code of Conduct will always be used as a guideline in the formulation of policies, manuals/procedures and management practices in the Company. The consistent application of the Code of Conduct will demonstrate the Company's efforts in upholding noble business values and ethics in conducting business, while simultaneously reinforcing the principles of Good Corporate Governance.
02. Business Ethics Standards	1. Ethics within The Employees a. Equal Treatment of Employees b. Employee Duties and Activities Beyond Banking Operations c. Restriction on Employees' Participation in Bank's Securities Transactions d. Employees' Compliance e. Working Environment f. Employees' Feedback Channel
	2. Bank Ethics with Customers The Company is committed to maintaining customer satisfaction and trustby offering high-quality products and services, providing excellent service, conducting honest and fair promotions, and safeguarding customers' personal data
	3. Banking Ethics with Goods and Services Providers In the procurement of goods and/or services, the Company must adhere to the principles of efficiency, effectiveness, competition, transparency, fairness, and accountability. Additionally, the expected ethical conduct includes responsibility, professionalism, maintaining confidentiality, avoiding conflicts of interest, and preventing waste and abuse of authority. The selection of providers must follow a fair and open process, and neither accepting nor offering gifts related to procurement is permitted
	4. Bank Ethics with The Competitor The Company uses competition as motivation to continuously improve performance. To this end, the bank takes several measures, such as complying with anti-monopoly laws, conducting market research, avoiding the abuse of dominant positions, and competing fairly by prioritizing high-quality products and services.
	5. Bank Ethics with Partner The Company highly appreciates respect and trust in order to maintain relationship with partners and committed to collaborate, obey the rules, achieve a maximum result, communicate intensively, and provide fair opportunities without any discrimination Bank Ethics with Government and Bank Regulator
	6. Bank Ethics with Government and Bank Regulator Perseroan berkomitmen mematuhi peraturan perundang-undangan yang berlaku.The Company committed to comply with existing laws and regulations.
	7. Bank Ethics with Society The Company is committed to making a positive contribution to sustainable economic development, with a focus on social responsibility and balancing economic, social, and environmental aspects.
	8. Bank Ethics with Media The Company utilizes the mass media as a strategic partner in promoting and building a favorable corporate image.
	9. Bank Ethics and Professional Associations The Company fosters a collaborative relationship with professional organizations and regulatory bodies to share information, experiences, and discuss business developments, as well as to seek optimal solutions to common challenges.
03. Behavioural Standard Policy	1. Employees should consistently avoid any condition, situation or appearance of a conflict of interest or misuse of office. All members of the Board of Commissioners and Directors, as well as Bank employees. 2. are prohibited from giving or receiving anything for personal benefit, directly or indirectly, from business partners that may influence decisions. 3. The Company is committed to healthy and ethical business competition, providing equal opportunities and promoting sustainable business practices, in accordance with relevant laws and regulations. 4. The Bank's organizational units and employees must comply with all applicable laws and regulations
04. Implementation and Enforcement	1. Every Bank employee must report any fact of deviation from the Corporate Code of Conduct to the Human Capital Management & Culture Specialist Division and the reporter's identity is protected. 2. The Human Capital Management & Culture Specialist Division follows up on each report and submits the results of its study to the Board of Directors and/or Commissioners in accordance with the scope of their responsibilities. 3. Ultimately, the Board of Directors and Commissioners decide on the provision of coaching actions, disciplinary sanctions and/or corrective and preventive actions that must be implemented by direct superiors in their respective environments.

Compliance With the Code of Ethics

The Code of Conduct applies to the Board of Commissioners, the Board of Directors, and Employees in carrying out all business activities of the Company and in interactions between the Commissioners, Directors, and Employees with all stakeholders. The formal declaration of the Code of Conduct's applicability across all organizational levels is stipulated through the Joint Decree of the Board of Commissioners Number 01/SKPB/KOM/BTN/2024 and the Board of Directors Number SKPB-01/DIR/BTN/2024 concerning the Business Ethics and Conduct Guidelines (Code of Conduct) of PT Bank Tabungan Negara (Persero) Tbk. The Company mandates the signing of a corporate statement of commitment to the Code of Conduct, known as the Integrity Pact, which must be duly implemented. The successful enforcement of the Code of Conduct is the responsibility of all leaders within their respective work units. Therefore, all unit leaders are required to provide a clear understanding of the Code of Conduct's implementation to employees within their respective work environments..

Socialization of the Code of Conduct and the Enforcement Efforts

Socialization of the Code of Conduct

The Code of Conduct is disseminated to all employees of the Company through **the Digital Room for E-learning Modules (DREAM)** media and a Code of Conduct quiz is provided to determine employee understanding of the Code of Conduct. Commitment to the Code of Conduct implementation is also stated in the Integrity Pact which must be signed by all Directors, Commissioners and Employees of the Company. In addition, the Code of Conduct can also be accessed by all of the Company's Stakeholders through the Company's website.

Efforts To Implement and Enforce The Code of Conduct

The Company provides strict and consistent sanctions against violations of the Code of Conduct. The imposition of sanctions for violations committed by the Board of Commissioners and Directors is based on the Company's Articles of Association and GMS resolutions. While the imposition of sanctions for employees is carried out in accordance with applicable employment regulations. The Company's efforts to implement and enforce the Code of Conduct in 2023 include:

1. Completion and signing of the Integrity Pact by all employees in accordance with the Code of Conduct values.
2. Internalization of the Code of Conduct, Gratification Control and Anti-Bribery Management System (SMAP) to all Employees through Digital Room for E-learning Modules (DREAM).
3. Cooperating with the KPK through the Professional with Integrity (PROFIT) program which includes competent HR to build integrity in preventing corruption within the Company through participation in training as an Integrity Building Expert (API) and in collaboration campaign with the KPK on preventing corruption through various communication media channels.
4. Implementing the Gratification Control Program in accordance with the established Work Plan and reporting its results to the KPK on a quarterly basis.
5. Managing gratification reports from all work units and reporting them to the KPK in accordance with the provisions.
6. Implementing a compliance program for fair business competition.
7. Implementing ISO 37001:2016 Anti-Bribery Management System (SMAP) as a manifestation of Business Ethics and Behavior listed in the Code of Conduct.
8. Implementing the Whistleblowing System (WBS) program.
9. Punishment for employees who violate business ethics.
10. Other Code of Conduct Implementation and Enforcement Efforts

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To ensure compliance with the Code of Ethics during the 2024 period, any suspected or actual violations of the Code of Ethics have been audited or investigated by the Internal Audit Unit..

Type of Sanctions of Code of Conducts

The Company classifies sanctions for each violation of the Code of Conduct in two types, namely:

1. Administrative sanctions

Sanction Category	Types of Sanctions	Types of Sanctions	Construction Period
Light Sanctions	Light Letter A	Verbal warning	3 (three) months
	Light Letter B	Written warning	
	Light Letter C	Statement of dissatisfaction	
Medium Penalty	Medium Letter A	Don't get vacation pay	1 (one) year
	Medium Letter B	Do not get regular salary adjustments	
	Medium Letter C	Person Grade reduction by 1 (one) grade (basic salary adjusted)	
Heavy Sanctions	Letter A Weight	Decreased person grade by a minimum of 2 (two) grades (basic salary adjusted)	2 (two) years
	Letter B Weight	Termination of employment (PHK)	
	Letter C Weight	Termination of employment and reporting to the authorities.	

2. Financial Sanctions
   Financial sanctions mean compensating for all financial losses that arise as a result of a disciplinary violation.

Number of Violations and Sanctions Given

No.	Sanction Category	Types of Sanctions	Number of Sanctions Per Year							Total anctions Given
				Tahun 2019	Tahun 2020	Tahun 2021	Tahun 2022	Tahun 2023	Tahun 2024	
1.	Light Sanctions	Light Letter A	22	23	27	14	9	11	4	61
		Light Letter B	31	15	19	28	5	15	15	67
		Light Letter C	24	25	47	35	6	11	0	99
2.	Medium Penalty	Medium Letter A	18	69	62	54	8	15	8	139
		Medium Letter B	13	53	32	21	10	12	20	75
		Medium Letter C	9	45	31	16	11	10	0	68
3.	Heavy Sanctions	Letter A Weight	2	5	10	5	3	1	3	19
		Letter B Weight	22	40	24	19	44	43	27	130
		Letter C Weight	0	0	6	3	3	1	4	13
TOTAL			**141**	**275**	**258**	**195**	**99**	**119**	**81**	**752**

Policy of Long-Term Performance-based Compensation to Management

The policy on performance-based long-term compensation for Management is regulated in Special Policy KK 3.B dated October 31, 2023, concerning Remuneration. The implementation of performance-based long-term compensation includes:

1. **Long Term Incentive (LTI)**
   Loa. Long-Term Incentives (LTI) are a compensation component linked to the achievement of long-term performance. This reward component is variable, as its implementation considers the realization of performance achievements. The objectives of LTI include:
   b. To ensure that the Bank has policy guidelines and procedures for granting LTI to Employees.
   c. To provide policy guidelines for Long-Term Incentives (LTI) for Employees.
   d. To enhance the bank's long-term performance through accelerated work execution and the realization of the company's strategic initiatives.
   e. To provide appreciation to PKWTT Employees who have contributed to the achievement of the Bank's performance.
   f. To serve as part of the employee retention policy.
   The Long-Term Incentive (LTI) program has been in place since 2020 and is granted in three vesting periods: vesting 1 in 2020, vesting 2 in 2021, and vesting 3 in 2022. Each vesting is subject to a share lock-up period of three years, extending until 2026.

   LTI is granted to employees in key positions or roles that have a strategic function in aligning corporate objectives while also supervising and controlling performance achievement in their respective Divisions/Regional Offices/Branch Offices. These positions include structural roles such as Division Head, Regional Office Head, Branch Head, Sharia Branch Head, Deputy/Vice Division Head, Deputy Regional Manager Business, Deputy Regional Manager Support, Department Head, Deputy Branch Manager, Deputy Service Manager, Commercial Banking Center (CBC) Head, CBC Manager, Commercial Risk Head, Commercial Risk Manager, Regional Loan Processing Center (RLPC) Head, as well as equivalent L1 and L2 positions as determined by the Board of Directors.

- *LTI Vesting 1 in 2020 was granted at a maximum of 50% of the total share purchase budget over three years, with 58,983,900 shares purchased at an average price of Rp. 958.55 per share and distributed to 549 LTI recipient employees. The shares are locked up until 2024.*
- *LTI Vesting 2 in 2021 was granted at a maximum of 25% of the total share purchase budget over three years, with 15,936,000 shares purchased at an average price of Rp. 1,566.62 per share and distributed to 599 LTI recipient employees. The shares are locked up until 2025.*
- *LTI Vesting 3 in 2022 was granted at a maximum of 25% of the total share purchase budget over three years, with 18,957,000 shares purchased at an average price of Rp. 1,728.50 per share and distributed to 690 LTI recipient employees. The shares are locked up until 2026*

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2. **Long-Term Bonus**
   The Long-Term Bonus is granted to employees at the managerial level or those holding strategic positions within Person Grade 4A to 5B, with a lock-up period of up to three (3) years until 2026. The budget allocated for the Long-Term Bonus program is Rp 100 billion, distributed to 239 employees in the form of the Company's shares.
3. **Head Stock Incentive for Sub Branch Heads**
   The Stock Incentive Rewards are granted to Sub Branch Heads (SBH) who fall under the "Productive" and "Highly Productive" categories, based on the criteria and parameters set by the Company. In 2024, stock rewards were given to 32 SBHs, with a total value of Rp 575,383,787, converted into 428,600 shares. The lock-up period is set for one (1) year.

In the administration and management of shares, including share purchases and distribution processes, the Company collaborates with two securities firms, Bahana Sekuritas and Mandiri Sekuritas.

Description of compensation in the form of shares is presented in the Sub-Chapter on Governance in the Provision of Remuneration. In addition, in accordance with POJK Number 45 / POJK.03 / 2015 concerning the Implementation of Governance in the Provision of Remuneration for Commercial Banks. The Company also has a variable remuneration scheme that is deferred (Malus) or withdraws variable remuneration that has been paid (Clawback) to officials who are classified as Material Risk Takers (MRT). This has been presented in the Sub-Chapter on Governance in the Provision of Remuneration.

Whistleblowing System

The Bank's Whistleblowing System (WBS) Policy is guided by Minister of State-Owned Enterprises Regulation No. PER-2/MBU/03/2023, on Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises, and Financial Services Authority Regulation (POJK) No. 12 of 2024, dated July 23, 2024, on Implementation of Anti-Fraud Strategies for Financial Institutions.. The Company's WBS is part of the internal control system in preventing the occurrence of irregularities and purposes to detect early and prevent the occurrence of irregularities or violations and gradually create an open, sincere, honest and responsible work climate in the Company.

Submission Mechanism of Violation Reports and WBS Channel

1. In case the Reported Party is the Company's employee up to 2 (two) levels below the Board of Directors and is not a member of the Company's WBS Team, the Independent WBS Manager will submit a report to the Company's WBS Team.
2. In case the reported party is a Bank employee 1 (one) level below the Directors and is not part of the WBS Team, the Independent WBS Manager will submit a report to the President Director.
3. If the reported party is the WBS Team, then the Independent WBS Manager will submit a report to the Main Director.
4. If the reported party is the Board of Directors, the Independent WBS Manager will submit a report to the Board of Commissioners and WBS Manager of the Ministry of State-Owned Enterprises (BUMN).
5. In case the reported party is a commissioner and/or committee under the Board of Commissioners, the Independent WBS Manager will submit a report to the Commissioners and Committee Members under the Board of Commissioners who are not related to the complaint and the WBS Manager of the Ministry of State-Owned Enterprises (BUMN) (specifically when the reported party is the Commissioner).
6. In case the reported party is a joint Commissioner, the Independent WBS Manager will submit a report to the WBS Manager of the Ministry of State-Owned Enterprises (BUMN).
7. In case the reported party is the Directors and/or Commissioners of a Subsidiary Company, the Independent WBS Manager will submit a report to the President Director of the Bank.

In improving the Company's values into business behavior and ethics in accordance with the principles of GCG, the Company collaborates with an independent party, namely PT Deloitte Advis Indonesia (Deloitte). The Company invites all employees and other stakeholders to participate in supervising the Company's activities by building supporting infrastructure in implementing the WBS policy where the reporter can submit their report through the following media:

1. PO Box 2828 JKP 10028
2. Website: https://idn.deloitte-halo.com/btnsiips/
3. Email: btnsiips@tipoffs.info;
4. SMS: +62 813 8870 1117
5. Whatsapp: +62 813 8870 1117
6. Telepon: +62 21-50928882
7. Faximili: +62 21-50928883

Whistleblower Protection

The Company is committed to protect to every whistleblower. Protection to the Whistleblower is provided to support the courage of the Whistleblower in reporting alleged violations and/or if there is retaliation from the Reported Person. For whistleblowers who submit WBS reports that are recognized for their accuracy and good faith, the Company can provide protection guarantees as follows :

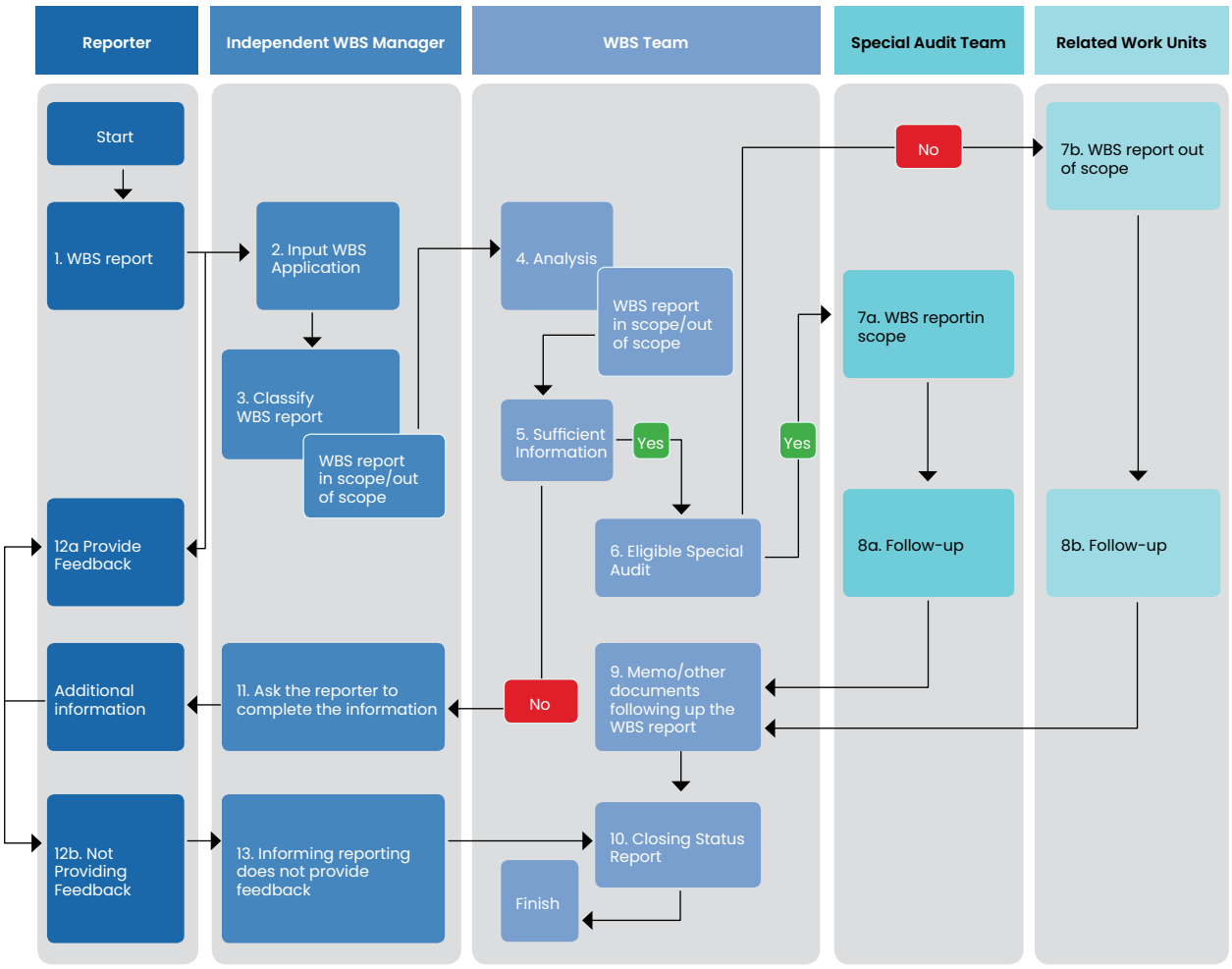
1. Provision of free and confidential WBS Reporting Media. The reporter will get information on the status of the WBS report submitted by the Independent WBS Manager through the designated media.
2. Guarantee of confidentiality of the Whistleblower's identity, except if there is a lawsuit that requires this identity to be disclosed before a judge.
3. Protection from countermeasures from the Reported Person. This protection may include:
   a. Physical and/or psychological protection of both oneself and one's family.
   b. Protection of their property and family property against terror or retaliation that must be experienced.
   c. Administrative protection in the form of postponement of promotion, dismissal, exclusion from the workplace, inappropriate transfers, including job security, etc.
   d. Legal protection, in terms of litigation process based on the applicable provisions.

The Handling of Complaints

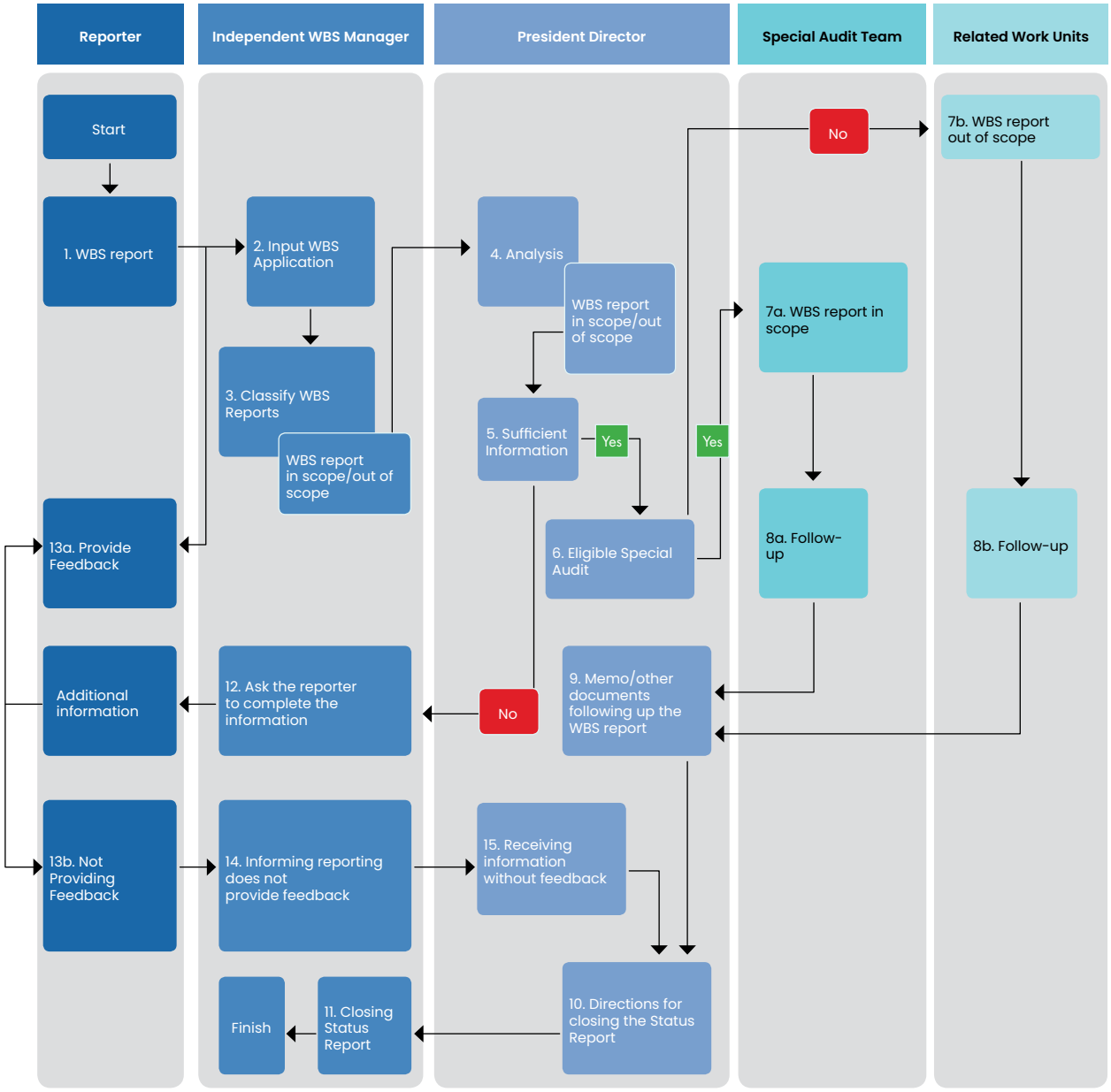
The Company has collaborated with Corruption Eradication Commission (KPK) of the Republic of Indonesia regarding WBS handling in an effort to eradicate corruption. The collaboration purposes to build and improve the effectiveness and efficiency of handling complaints both internally and externally that are integrated in a professional, transparent, accountable manner by prioritizing confidentiality in the context of optimizing the eradication of corruption. .

Every coming reports will be followed-up by WBS Team with the following mechanism:

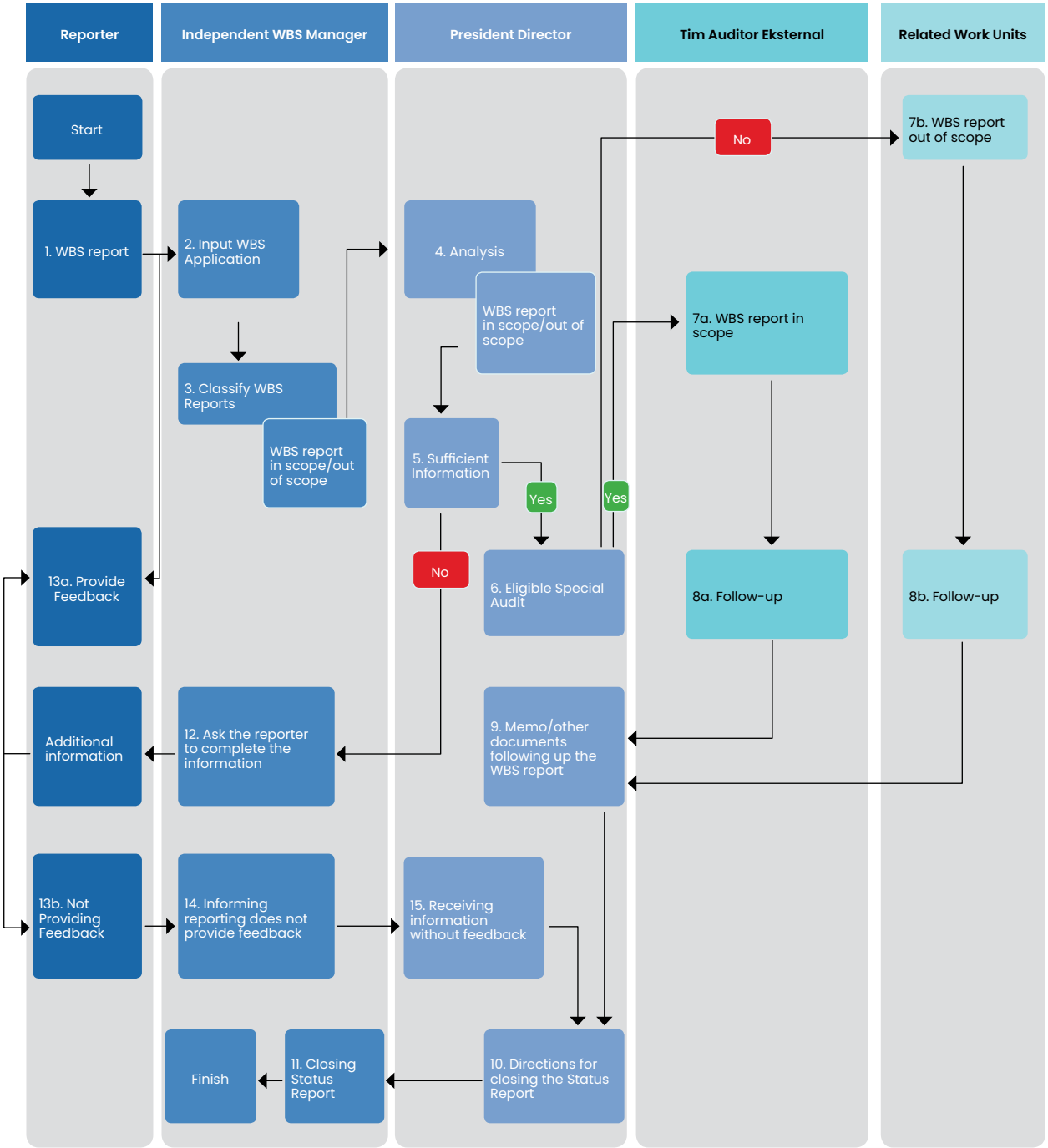
1. If the Reported person is a Bank employee (up to 2 levels below the Board of Directors and not the WBS Team)



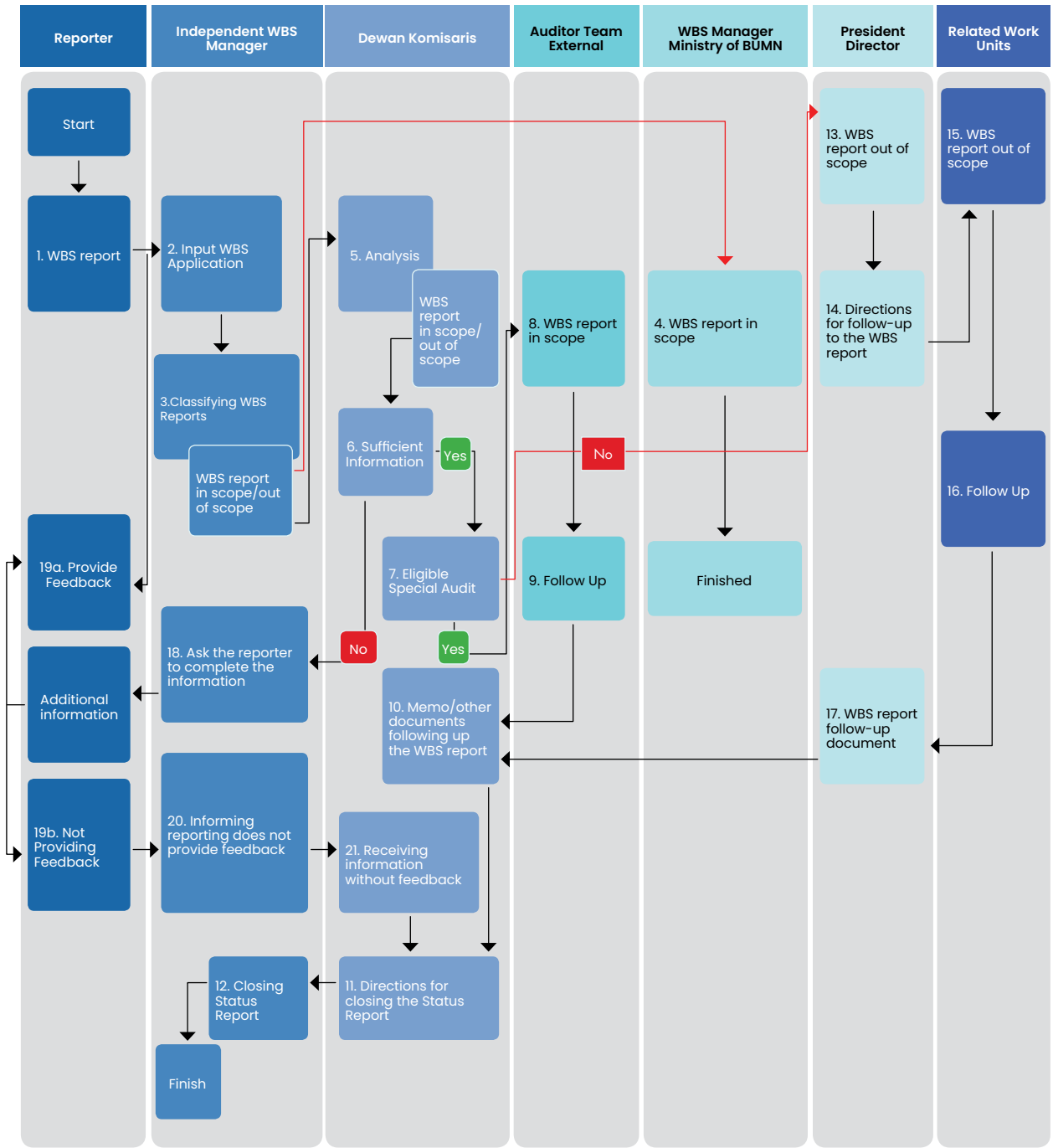
2. the Reported Person is a Bank employee (1 level below the Board of Directors) and not the WBS Team



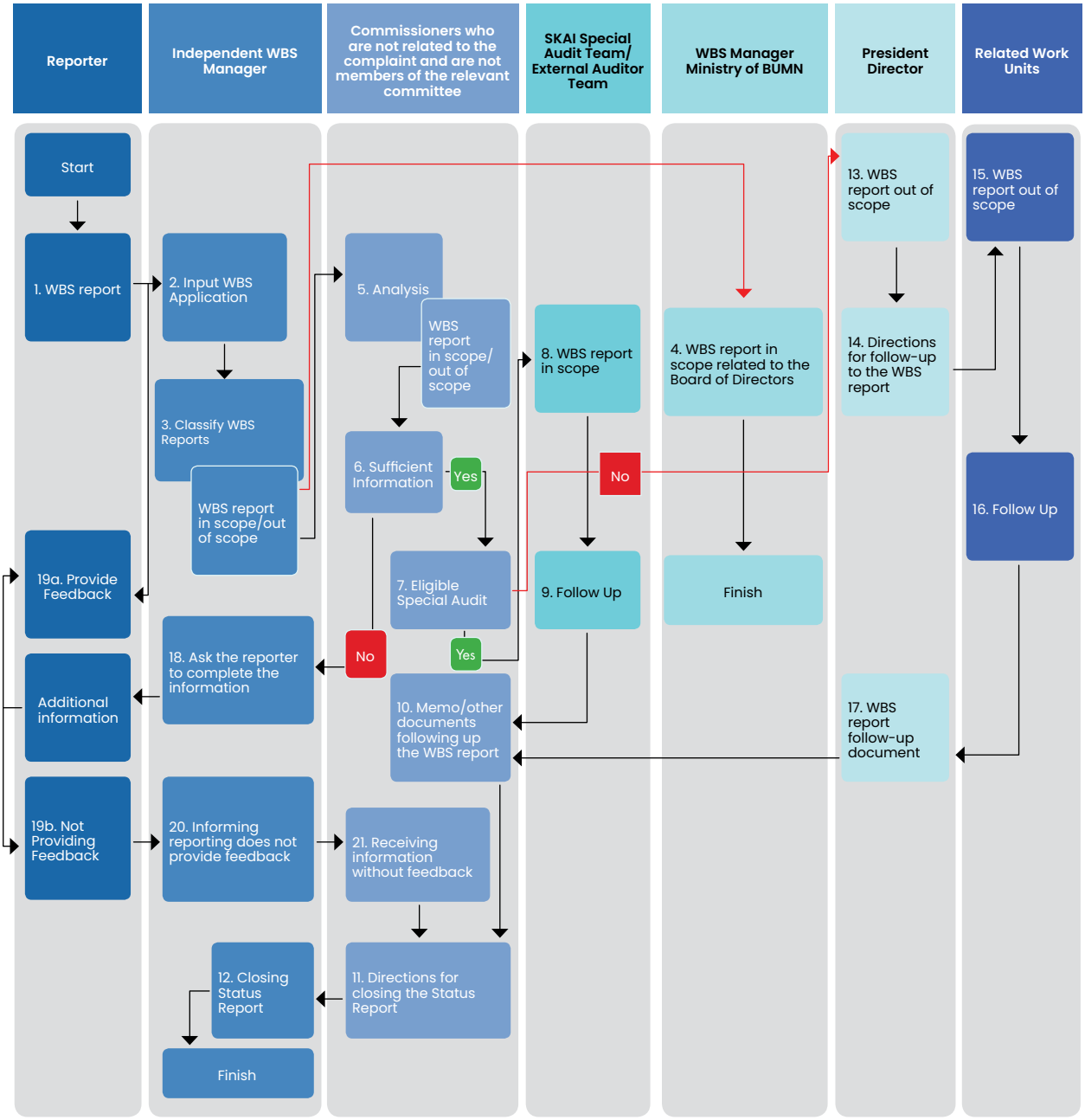
3. If the Reported Person is the WBS Team



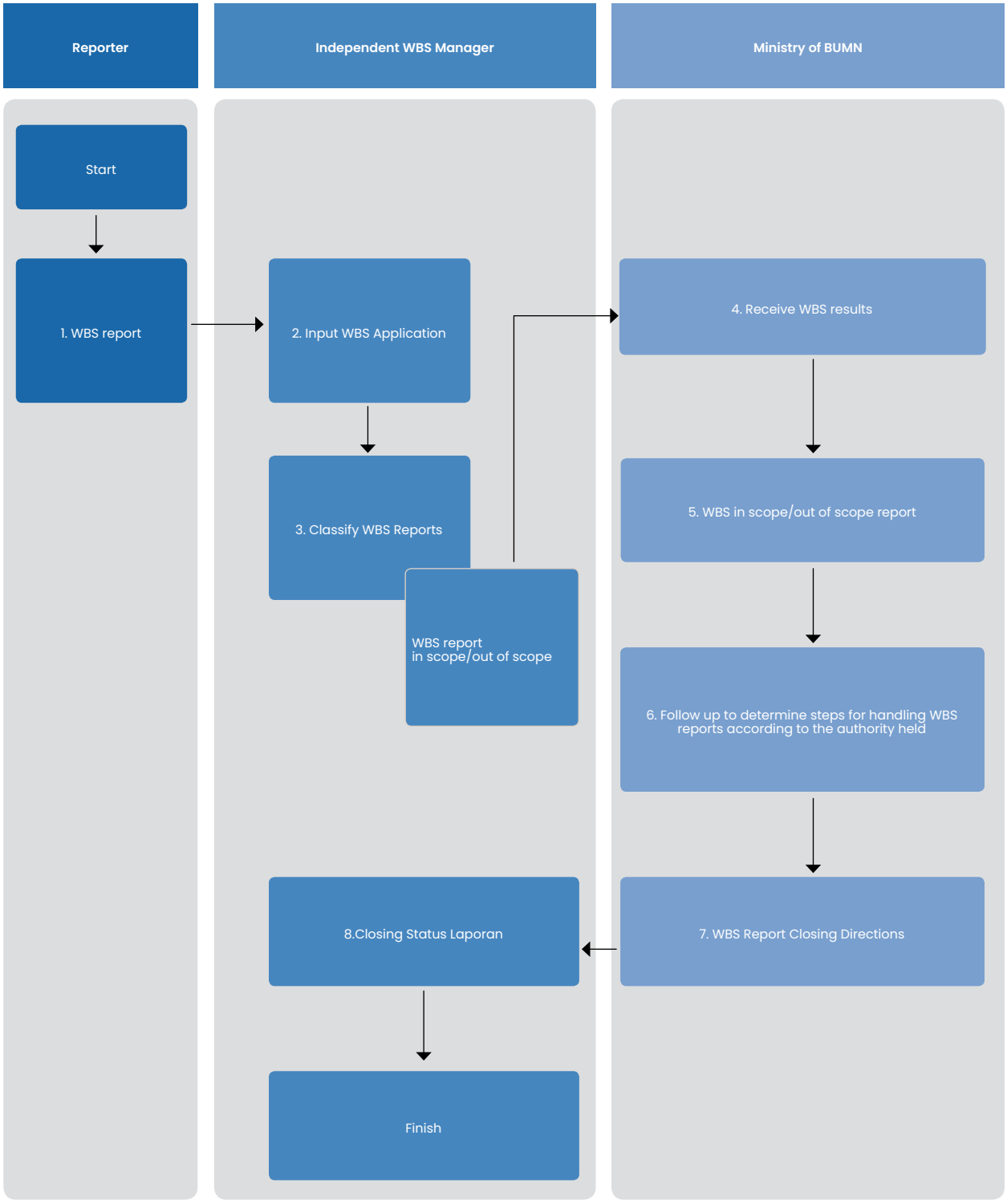
4. If the Reported Person is a DirectorIf the Reported Person is a Director



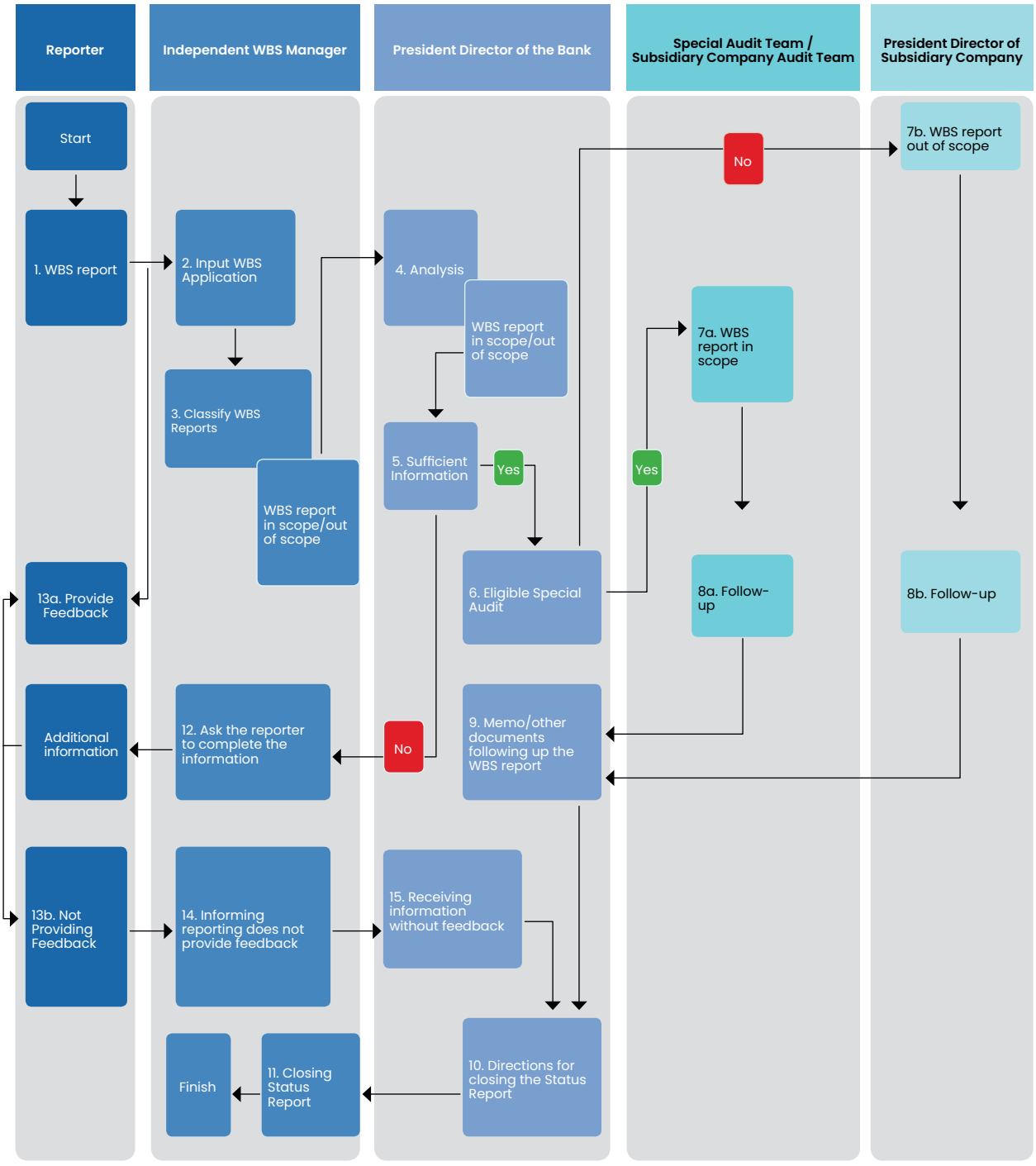
5. If the Reported Person is a Commissioner and/or Committee below the Board of Commissioners



6. If the Reported Person is a Joint Commissioner



7. If the Reported Person is a Board of Directors and/or Commissioner of a Subsidiary



Types of Violations That May be Reported

The violation in question is an act that is against the law, unethical/ immoral acts or other actions that can harm the organization or stakeholders. Several examples of violations and/or irregular practices that may be reported based on the WBS policy include the following:

1. Behavior - Lifestyle
2. Information Leakage
3. Complaints about Banking Service Products
4. Fraud
5. Conflict of Interest
6. Abuse of Authority
7. Bribery/Bribery
8. Gratuity
9. Blackmail
10. Theft/Embezzlement
11. Miscellaneous Violations of Law

Violation Report Management

The WBS Management Structure consists of the Person in Charge of implementation and the WBS Team. The Person in Charge of implementation is the President Director while the WBS Team consists of:

1. Head of Internal Audit Work Unit
2. Deputy Head of Internal Audit Work Unit
3. WBS management Unit led by a Head of Department in the Internal Audit Work Unit

The WBS Management Unit operates under the Internal Audit Division and is responsible for handling all processes related to the Whistleblowing System (WBS) within the Company. Additionally, in managing complaints received through the WBS channels, the Company is assisted by an independent third party, PT Deloitte Advis Indonesia.

Whistleblowing System Socialization

The Bank internalized the WBS by distributing guidelines for the Implementation of the Whistleblowing System (WBS) Policy which was stipulated based on a Directors' Circular Letter as well as direct sharing session presentations to all leaders and employees of the Bank. In addition, to reach all of the Bank's stakeholders, the Whistleblowing System socialization was also carried out through the Bank's website and various media, such as internal newsletters, posters, standing banners, customer gatherings, live presentations of ethical guidelines, and WBS policies.

Total Complaints and Complaints Processes

In 2024, a total of 162 complaints were received, consisting of 67 complaints submitted via SMS/ Telephone/WhatsApp and 95 complaints received through Email/Website/P.O. Box. Based on the complaints received: 112 complaints were unproven, 8 complaints are still in the process of information gathering/follow-up, and 42 complaints have been processed and/or resulted in sanctions. A detailed breakdown of the number of complaints forwarded for audit in recent years is as follows:

Table of WBS Complaints Forwarded to the Audit Process

Years	Submission Method			Tindak Lanjut			
	Letter/ PO BOX	SMS/ Telepon/ /WA	Email/ Website	Report closed (not proven)	Report still in the process (Audit Process/ Reporting Process/ Cross Division Process)	The report has been processed and/or has been completed given sanctions (including sanctions administrative)	Report forwarded to Investigators (related to criminal acts general or Corruption)
2020	3	2	9	0	4	10	0
2021	0	2	3	0	0	5	0
2022	0	1	1	0	2	0	0
2023	0	1	4	0	0	5	0
2024	0	0	3	0	1	2	0

Anti-Corruption Program

Company is committed to eradicating corruption by encouraging the effectiveness of gratituity control policies implementation, the Whistleblowing System, Management of the Report Assets of the State Administrator (LHKPN), as well as the Anti-Money Laundering Program (AML) and Counter-Terrorism Financing Program (CFT). Additionally, the Company supports the Anti-Corruption Program through various initiatives, including: Surveillance Certification and Extended Scope of ISO 37001:2016 for the Anti-Bribery Management System (SMAP), Compliance Assessment on the implementation of ISO parameters, Participation in the Certification of Integrity Builders Experts (API) and Anti-Corruption Educators Certification (PAKSI), API PAKSI BTN Empowerment Program, Family with Integrity Program, Establishment of the BTN Anti-Corruption Competency Testing Center (TUK), Commemoration of International Anti-Corruption Day (Hakordia), and Integrity Assessment Survey.

Programs and Procedures Conducted to Resolve Corruption Practices

Anti-Bribery Management System

In line with its commitment to combating corruption, BTN obtained ISO 37001:2016 Anti-Bribery Management System (SMAP) certification on August 11, 2020, issued by the SNI ISO 37001:2016 Certification Body for the implementation of ISO 37001:2016 within the Company. In 2024, the scope of the ISO 37001:2016 Anti-Bribery Management System (SMAP) certification includes:

1. Procurement of goods and/or services at the Procurement and Fixed Asset Management Division (PFAD).
2. Commercial Credit in the Commercial Banking Division (CMBD) and Corporate Banking Division (CBD).
3. SME Credit Restructuring at the following Regional Offices: West Java Regional Office (Kanwil Jabar) Jakarta II Regional Office (Kanwil Jakarta II) East Java, Bali, and Nusra Regional Office (Kanwil Jatim Bali Nusra) Sumatra Regional Office (Kanwil Sumatera) Sulawesi, Maluku, and Papua Regional Office (Kanwil Sulawesi Maluku Papua) Central Java and Yogyakarta Regional Office (Kanwil Jateng DIY)
4. Wholesale Credit Risk Division (WRD).
5. Small Medium Enterprise Banking Division (SMBD).
6. Commercial Banking Center Jakarta Raya, Bintaro Jaya, Bekasi and Bandung.
7. Credit Operation Division (COD).

The implementation of ISO 37001:2016 Anti-Bribery Management System (SMAP) certification is based on the Letter from the Minister of State-Owned Enterprises of the Republic of Indonesia No. S-17/S.MBU/02/2020 regarding the ISO 37001:2016 Anti-Bribery Management System (SMAP) Certification in SOEs. Additionally, the Company has established internal policies related to anti-bribery management, including: Special Policy No. KK. 6-E on the Guidelines for the Anti-Bribery Management System, dated January 1, 2023. Technical Guidelines No. PT. 6-E.1 on the Procedures for Implementing the Anti-Bribery Management System, dated January 1, 2023.

To maintain the ISO 37001:2016 Anti-Bribery Management System (SMAP) certification, a Surveillance Audit was conducted from October 7 to October 11, 2024 covering the following areas : Procurement and Fixed Asset Management Division (PFAD), Commercial Banking Division (CMBD) Corporate Banking Division (CBD), SME Restructuring at: West Java Regional Office (Kanwil Jawa Barat), Jakarta II Regional Office (Kanwil Jakarta II), East Java, Bali, and Nusra Regional Office (Kanwil Jatim Bali Nusra), Sumatra Regional Office (Kanwil Sumatera), Sulawesi, Maluku, and Papua Regional Office (Kanwil Sulawesi Maluku Papua), Central Java and Yogyakarta Regional Office (Kanwil Jateng DIY), Wholesale Credit Risk Division (WRD), Small Medium Enterprise Banking Division (SMBD), Commercial Banking Centers in Jakarta Raya, Bintaro Jaya, Bekasi, and Bandung

The Company successfully maintained its ISO 37001:2016 SMAP certification, as confirmed by the ISO 37001:2016 Certification Body following the surveillance audit. Additionally, as part of its continuous improvement efforts, the Company expanded the scope of ISO 37001:2016 SMAP (Extend Scope) by including the Credit Operation Division (COD). The certification audit for this expansion was conducted from October 7 to October 11, 2024, resulting in an increase in the total scope of implementation to 16 areas under the ISO 37001:2016 SMAP certification.

To implement the effectiveness of the implementation of the Anti- Bribery Management System (SMAP), the Company has an Anti-Bribery Management System (SMAP) organization based on SNI ISO 37001:2016 consisting of Governing Body, Top Management and Anti-Bribery Compliance Function (FKAP). In this case, Governing Body is the authority of the Board of Commissioners while the FKAP functions in the Compliance and Governance Divisions.

The management of the Anti-Bribery Management System (SMAP) had been running well according to the Guidelines for the AntiBribery Management System (SMAP), including:

1. Signing of BTN's Anti-Bribery Policy by Top Management (i.e., President Director) and the Governing Body (i.e., President Commissioner) as part of the Company's Management commitment to anti-bribery implementation.

2. Conducted an assessment of changes in internal and external issues that were relevant to the anti-bribery management system;
3. Conducted an assessment of the effectiveness of actions taken to address the risk of bribery;
4. Conducted an assessment of opportunities for continuous improvement of the SMAP;
5. Internalizing SMAP and Whistleblowing System (WBS) through various socialization media to Debtors and Vendors to improve the quality of SMAP;
6. Signing the Employee Integrity Pact related to SMAP implementation commitment which is renewed annually on a regular basis;
7. Conducted an assessment of the work unit addition certified by ISO 37001:2016 SMAP.

Bank BTN is committed to performing continuous improvement in implementing ISO 37001:2016 Anti-Bribery Management System to accomplish free from corruption, collusion, and nepotism Company. The Bank will always invite business partners/work partners to support the implementation of SMAP ISO 37001:2016 in the Company by signing an Integrity Pact with the commitment that while working with the Company, will not practice gratituities, bribes, or other actions that violate applicable laws and regulations.

The implementation of the Anti-Bribery Management System was expected to increase the trust of all Company stakeholders, including business partners/work partners in establishing cooperation and would increase the efficiency of business processes. As a financial institution, the Company must enhance its reputation by ensuring efficient business processes, adhering to Good Corporate Governance (GCG) principles, and complying with international standards such as ISO 37001:2016 Anti-Bribery Management System (SMAP).

The final result that would be obtained by the Bank, with the application of ISO 37001:2016, was an increase in the competitiveness of the Bank in the long term so that the Company would be healthier and grow in a sustainable manner. The Company had also implemented SNI ISO 9001:2015 Quality Management System, namely the audit process in the Internal Audit Division, the KPR process in the Non-Subsidized Mortgage & Personal Lending Division, business processes in the Enterprise Risk Management Division, Compliance & Governance Division and Learning Management Division.

COMPLIANCE ASSESSMENT ON THE IMPLEMENTATION OF ISO 37001:2016 SMAP 2024 IN BRANCH OFFICES

As part of the improvement efforts in implementing the ISO 37001:2016 Anti-Bribery Management System (SMAP) certification across 16 certified areas, the Company has undertaken development and adaptation by extending the implementation of ISO 37001:2016 SMAP parameters to 115 branch offices. This initiative reflects the commitment of the Board of Directors and Board of Commissioners to ensuring that the Anti-Bribery Management System (SMAP), which has been successfully implemented in certified business units, is also applied across all operational lines and business units within the Company, including BTN branch offices throughout Indonesia.

SMAP parameters in branch offices is not subject to certification by an ISO Certification Body. Instead, it is assessed and measured through a Compliance Assessment, which serves as a systematic evaluation method to measure the effectiveness of ISO 37001:2016 SMAP-based implementation in branch offices. The Compliance Assessment aims to: analyze the level of awareness and compliance in implementing the Anti-Bribery Management System (SMAP) across the Company's business units, provide recommendations for improvement and propose enhancements to strengthen awareness and compliance in implementing SMAP. The Compliance Assessment is based on three key principles: Adequacy of Policies and Procedures, Internal and External Communication, Monitoring and Review Process. The assessment covers 115 branch offices and evaluates their maturity level based on specific compliance criteria, which are categorized as follows:

Score	Maturity Level	Description
0 - 10	Vulnerable	The implementation of the **Anti-Bribery Management System (SMAP)** has not been carried out consistently across all business units.
>10 – 20	Reactive	The implementation of the **Anti-Bribery Management System (SMAP)** has been carried out; however, it is not yet fully consistent across all areas and has not become an established work pattern or culture within the business units.
>20 – 30	Compliant	The implementation of the **Anti-Bribery Management System (SMAP)** has been carried out consistently; however, it remains limited to meeting regulatory requirements.
> 30 – 40	Proactive	The implementation of the **Anti-Bribery Management System (SMAP)** has been carried out consistently and is fully integrated into daily operations.
> 40	Resilient	The implementation of the **Anti-Bribery Management System (SMAP)** has been carried out consistently, has become an organizational culture, and the business unit has taken proactive measures.

Based on the results of the Compliance Assessment Analysis conducted on 81 Branch Offices and 34 Sharia Branch Offices (115 Branch Offices in total), along with confirmations through interviews with a sample of 30 Branch Offices and Sharia Branch Offices, the analysis results indicate the following: 111 Branch Offices and Sharia Branch Offices fall under the **Comply** category, 32 Branch Offices are categorized as **Compliant**, 72 Branch Offices are categorized as **Proactive**, 7 Branch Offices fall under the Resilient category.

IMPLEMENTATION OF INTEGRITY BUILDER EXPERT (API) CERTIFICATION

Participation in Integrity Building Expert Certification (API) was achieved to strengthen the Company's integrity system, notably in preventing corruption and as a commitment to the Company's cooperation with the Corruption Eradication Commission (KPK) in the Professional Integrity (PROFIT) program.

API certification was certified personnel who were competent to build a national standard integrity system in efforts to eradicate and prevent corruption. The Bank attempts to construct an integrity system and sustainably strengthen the integrity system, one of which was through API certification.

The Company's employees who had been declared competent and received API certificates from 2019 to 2024 are 96 employees. Competent API certification participants in the future are expected to become a trigger mechanism and could implement the commitments that have been made in the form of follow-up plans after certification, namely increasing integrity awareness, creating risk profiles, and mitigating them regarding activities in work areas prone to corruption, encouraging the establishment and strengthening corruption prevention policies in the work environment or agencies by executing internalization through webinar activities and GCG socialization and Disciplinary Provisions to all employees in the work environment on a regular and continuous basis.

The Company participated in the Integrity Builder Expert (API) certification organized by the Professional Certification Institute (LSP) of the Corruption Eradication Commission (KPK) in 2024 under the API Muda scheme. This certification was conducted in two batches: Batch 1 in March 2024 Batch 2 in June 2024. From the e-learning process to the assessment stage, the results were as follows: 4 employees were declared Competent in API Muda Batch 1, 7 employees were declared Competent in API Muda Batch 2.

The steps taken to participate in the Integrity Building Expert (API) certification throughout the 2024 period were as follows:

1. Determination of Certified Candidates selected by the Board of Directors.
2. Internal verification conducted by the Human Capital Management Division (HCMD).
3. Socialization & Technical Guidance provided by LSP KPK and the Compliance and Governance Division (CMGD).
4. In-depth Learning – Through e-learning from LSP KPK.
5. Completion of APL-01 Form – Personal biodata form for certification candidates.
6. Completion of APL-02 Form – Self-assessment form for competency evaluation.
7. Submission of Supporting Documents
8. Candidate Registration through the LSP KPK registration link.
9. Competency Assessment – Conducted offline (face-to-face).

At the 2024 International Anti-Corruption Day (Hakordia) Commemoration Event, organized by the Corruption Eradication Commission (KPK) on December 9, 2024, at Gedung Juang, Gedung Merah Putih KPK, Jakarta, the KPK awarded one of BTN's API-certified employees the title of Inspirational Integrity Builder Expert (API) in the Innovative API Category 2024. The award was presented directly by KPK Deputy Chairman, Mr. Nurul Ghufron.

IMPLEMENTATION OF ANTI-CORRUPTION EXTENSION WORKER CERTIFICATION (PAKSI)

The Company, in supporting programs and efforts to prevent corruption by the Corruption Eradication Commission (KPK), has, up until 2024, involved a total of 67 BTN employees and 6 representatives of employees' wives from IIKPA, who have been declared competent by the KPK's Professional Certification Institute (LSP) in the implementation of the Anti-Corruption Instructor (PAKSI) Certification. An Anti-Corruption Instructor (PAKSI) is a certified individual with expertise in a specific field of anti-corruption education and is assigned by their organization to carry out anti-corruption awareness activities within their organization and its network.

The Company's participation in the implementation of the Anti-Corruption Instructor (PAKSI) certification, organized by the Professional Certification Institute (LSP) of the Corruption Eradication Commission (KPK) in 2024, began with the e-learning process, followed by the Training for Prospective Anti-Corruption Instructors (PELOPOR), and concluded with the assessment process. The assessment was conducted using two methods: Remote Assessment (AJJ) or Online Method, where 21 employees were declared competent. Face-to-Face Assessment at the BTN Competency Testing Center (TUK) conducted onsite, where 16 employees were declared competent. In total, 37 employees successfully passed the PAKSI BTN certification assessment and

were declared competent through both assessment methods.

The steps involved in taking part in the Anti-Corruption Instructor (PAKSI) certification are as follows:

1. Determination of Anti-Corruption Instructor Certification Candidates through the PELOPOR Training Pathway by the Board of Directors.
2. Internal verification of participants from the Human Capital Management Division (HCMD); 664 PT Bank Tabungan Negara (Persero) Tbk Corporate Governance
3. Socialization and Technical Guidance from LSP KPK and Compliance and Governance Division (CMGD);
4. Implementation of E-Learning "Basic Knowledge of AntiCorruption and Integrity" which was done independently (online);
5. Fill out the Registration Form for Anti-Corruption Extension Officer Candidate Training (ACEOCT);
6. Implementation of Anti-Corruption Instructor Candidate Training (PELOPOR) conducted offline.
7. Registration of Anti-Corruption Extension Officer (ACEO) Assessment Certification through the LSP KPK link;
8. Implementation of an online Anti-Corruption Extension Officer Assessment (ACEO).

In the 2024 Anti-Corruption Instructor Certification program, a face-to-face assessment was conducted at Graha Learning BTN Center Tebet for the first time,. This was carried out alongside the inauguration of the Company's Learning Center as the first Anti-Corruption Competency Testing Center outside the LSP KPK.

INTEGRITY FAMILY

In order to build an anti-corruption culture within families, the Integrity Family Program was implemented. This program focuses on the crucial role of families in instilling values of integrity and honesty, which are considered the fundamental foundation for preventing corrupt behavior in the future. The program was conducted by the Company on April 26, 2024, in collaboration with the Directorate of Community Participation of the Corruption Eradication Commission (KPK) at the Ballroom of Menara BTN. This event was attended by 40 Layer 1 Officials within the Company (Division Heads, Regional Office Heads, and Branch Office Heads) along with their spouses. The primary objective was to strengthen the integrity of leaders as role models, starting within their own families.

FORMATION OF ANTI-CORRUPTION COMPETENCY TEST PLACE (TUK) BTN

In 2024, BTN's Learning Center was officially designated as the first Anti-Corruption Competency Test Center (TUK) outside the Professional Certification Institution of the Corruption Eradication Commission (LSP KPK). This designation was granted by KPK based on several key considerations such as Active Participation in Certification Programs. BTN has actively engaged in the Integrity Builder (API) and Anti-Corruption Counselor (PAKSI) certification programs. The next one is Highest Number of Certified Employees. As a State-Owned Enterprise (BUMN), BTN holds the record for the highest number of certified personnel, with 156 employees holding API and PAKSI certifications. Another factor is established API and PAKSI Forum. BTN has a structured API and PAKSI Forum, which plays an active role in promoting integrity and anti-corruption initiatives. Then, Strong Collaboration with KPK. BTN maintains effective communication and coordination with KPK in driving anti-corruption programs. Last one is Prior Experience as a Competency Test Center. BTN previously served as a temporary TUK in 2020, demonstrating its capability to operate as a permanent Anti-Corruption TUK. This designation is valid for three years, further reinforcing BTN's commitment to anti-corruption efforts. The official inauguration of BTN's Anti-Corruption TUK took place at Graha Learning Center BTN Tebet on October 31, 2024. The event was attended by Mr. Eko Waluyo, Director of Human Capital, Compliance, and Legal BTN, alongside Mr. Wawan Wardiana, Deputy for Education and Community Participation at KPK.

BTN API-PAKSI EMPLOYEE EMPOWERMENT PROGRAM 2024

As part of **BTN's commitment and collaboration with the Corruption Eradication Commission (KPK)** in corruption prevention efforts, the company has actively participated in **KPK's Anti-Corruption Sector Certification Program (API and PAKSI Certifications)** since 2019. Currently, there are 96 BTN employees have been certified as Integrity Builders (API) and 67 BTN employees have been certified as Anti-Corruption Counselors (PAKSI). To ensure the fulfillment of each employee's commitment plan during certification and to further enhance the active role and empowerment of API and PAKSI members in strengthening organizational integrity, BTN has established a structured empowerment program and mandatory action initiatives for all API and PAKSI-certified employees.

1. All API and PAKSI members at BTN are required to conduct at least one activity per quarter, selecting from one of the following four options:
   a. Initiating, Creating, Proposing, Reviewing, or Recommending Integrity-Related Activities, Policies, or Programs within the Bank's Internal Environment (example : Official assignment letter, Policy review documents, Meeting minutes, Internal memos or reports
   b. Conducting Awareness Activities to Enhance Integrity (Theme: Corruption Culture, Risk Awareness, Anti-Fraud, Compliance, Signing of the Integrity Pact, etc. for employees in each work unit through internalization conducted onsite/online). (evidence: Integrity Pact, minutes of socialization events, documentation of socialization, invitations to socialization events, etc).
   c. Conducting external dissemination of the corruption prevention program to partners/ business associates/debtors within each work unit through socialization, letters, emails, and/or other media. (evidence: socialization documentation, letters, emails, etc).
   d. Spreading integrity messages through personal social media (Instagram, Facebook, X (twitter), WhatsApp status), BTN SmartShare, writing articles in BTNMagz, and/or other media.), btn smartshare, menulis artikel di BTNMagz, dan atau media lainnya. (evidence: documentation of Instagram, Facebook, X (twitter), and others).
2. Each API PAKSI empowerment activity is reported through reporting media, including external reporting (KPK Aksesku website) and internal reporting (a link provided by the company).
3. As a form of appreciation for the active role of employees certified as API and PAKSI in the organization's integrity program, during the peak event of the 2024 International Anti-Corruption Day (Hakordia) within the company, awards were given to Inspirational API and PAKSI.

During the period from January to December 2024, a total of 45 (forty-five) activity reports were submitted by API PAKSI BTN. This serves as evidence that API PAKSI BTN has been actively engaged within their respective work units in raising awareness among employees regarding corruption and gratuities.

Furthermore, at the 2024 International Anti-Corruption Day (Hakordia) commemoration event organized by the Corruption Eradication Commission (KPK), in recognition of the Company's active role in empowering employees certified as API and PAKSI, the Company received the following awards from KPK:

1. Strategic Partner of KPK in the Implementation of the Anti-Corruption Sector Certification in 2024.
2. Most Active Institution in the Ministry/Agency/Local Government Category for API PAKSI Empowerment in 2024.
3. One of the employees received the award as an Innovative Integrity Builder (API) in 2024.

The implementation of the API PAKSI Empowerment Program has also had a positive impact on the Company, namely: (1) Enhancing the Culture of Integrity Among Employees – Increasing employees' understanding of the importance of honesty, responsibility, and accountability, (2) Corruption Prevention – Raising individual awareness to avoid involvement in corrupt practices, (3) Improving Corporate Governance – Enabling the institution to implement good governance principles (GCG).

COMMEMORATION OF INTERNATIONAL ANTI-CORRUPTION DAY (HAKORDIA) 2024

To commemorate International Anti-Corruption Day (Hakordia), which is observed every December 9, the Company organized a series of "Road to Hakordia 2024" activities. These initiatives aimed to disseminate anti-corruption messages through various media channels, including: Corporate social media platforms (Instagram, Facebook, Twitter), Video displays on LED TVs in the lobby of Menara BTN 1, Posters featuring the Hakordia 2024 theme, WhatsApp blasts and email blasts from the Gratification Control Unit (UPG) to all employees, B-Gate (BTN Geo Attendance) notifications

The Grand Celebration of International Anti-Corruption Day (Hakordia) 2024 within the Company's internal environment was held at Menara BTN 1 on December 19, 2024. The event featured various activities, including: Integrity reinforcement session by Mr. Sugiarto, Head of the Certification and Empowerment Task Force at LSP KPK RI, Launching of the UPG (Gratification Control Unit) logo and the Forum for API PAKSI BTN Communication (Forkom) logo, Screening of the 2024 Governance Strengthening and Gratification Control Program Kaleidoscope Video Recognition Awards for Gratification Whistleblowers, Screening of the 2024 API PAKSI BTN Empowerment Program Video, Recognition Awards for Inspirational API PAKSI Employees, Recognition Awards for Branch Offices (KC/KCS) for their active role in strengthening integrity. This event served as a momentum to reinforce anti-corruption values and appreciate employees and branches actively promoting integrity within the Company.

The Gratification Whistleblower Award was presented to three selected employees who reported gratification cases in 2024 under the following categories: Whistleblower with the Highest Number of Reports, Whistleblower with the Highest Reported Nominal Value, Inspirational Whistleblower

At the Hakordia 2024 event, appreciation was also given to Inspirational API PAKSI of the Year 2024 and One KC/KCS for its Active Role in Strengthening Integrity. These recognitions aim to motivate employees to actively engage in gratification control and corruption prevention through gratification reporting and API certification. Additionally, the awards serve as an inspiration for all employees to become role models in their respective work units, reinforcing the Company's integrity system in its continuous efforts to prevent corruption.

Gratification Control

Gratification control is an important aspect for the Company to preserve business activities in line with Business Ethics, which highlights the significance of Integrity. The Bank enforces Gratification Control policies aimed at developing the principles of GCG values and instilling the importance of Integrity with all employees so that business activities are constantly founded on Ethics and Responsibility. Gratification Control is likewise compulsory so that the business interests are well maintained ethically and do not conflict with the provisions regarding the prohibition of Gratification.

In line with the aim, Company implements a culture of not accepting gifts or rewards from customers, debtors, vendors, partners, work partners, and other third parties regarding the services provided by employees in performing their duties. It usually experiences its peak in the days leading up to Religious Holidays (Eid Mubarak, Christmas/New Year). The Company consistently makes announcements through social media platforms (Instagram, Facebook, X), internal company media, advisory memos to all employees regarding the prohibition of receiving or giving gratuities, and national newspapers that reach the wider public. These announcements emphasize that the Board of Commissioners, Directors, and all employees of the Company are fully committed to not accepting and/or requesting gifts or packages in any form from or to customers, debtors, partners/vendors, business associates, or any third parties.

Company also persuades all customers, debtors, partners/ vendors/work partners, and other parties who have or intend to conduct business relations with the Company to support this commitment by not giving gifts or gifts of any kind, whether directly or indirectly. Notification regarding this matter is also made by the Bank through written letters to each customer, debtor, vendor, partner, business partner, and other third parties who conduct business relations with the Company.

MANAGEMENT OF GRATITUITY CONTROL

Company's sincerity in supporting the eradication of corruption was proved by collaborating with the KPK to sign a commitment to implement the Gratituity Control Program within the Company since June 25, 2014. Based on this commitment, in 2015 Company had internal guidelines and the Gratituity Control Unit (UPG) that played an active role in disseminating awareness and understanding of Gratituity and Anti-Corruption Control.

The Company has established policies as guidelines for the implementation of gratuity control within the Company through Special Policy Number KK.6-A, regarding Gratuity Control Procedures and Technical Guidelines Number PT.6-A.1, regarding the Implementation Guidelines for Gratuity Control. As an initiative to support gratuity control, these policies regulate the following matters:

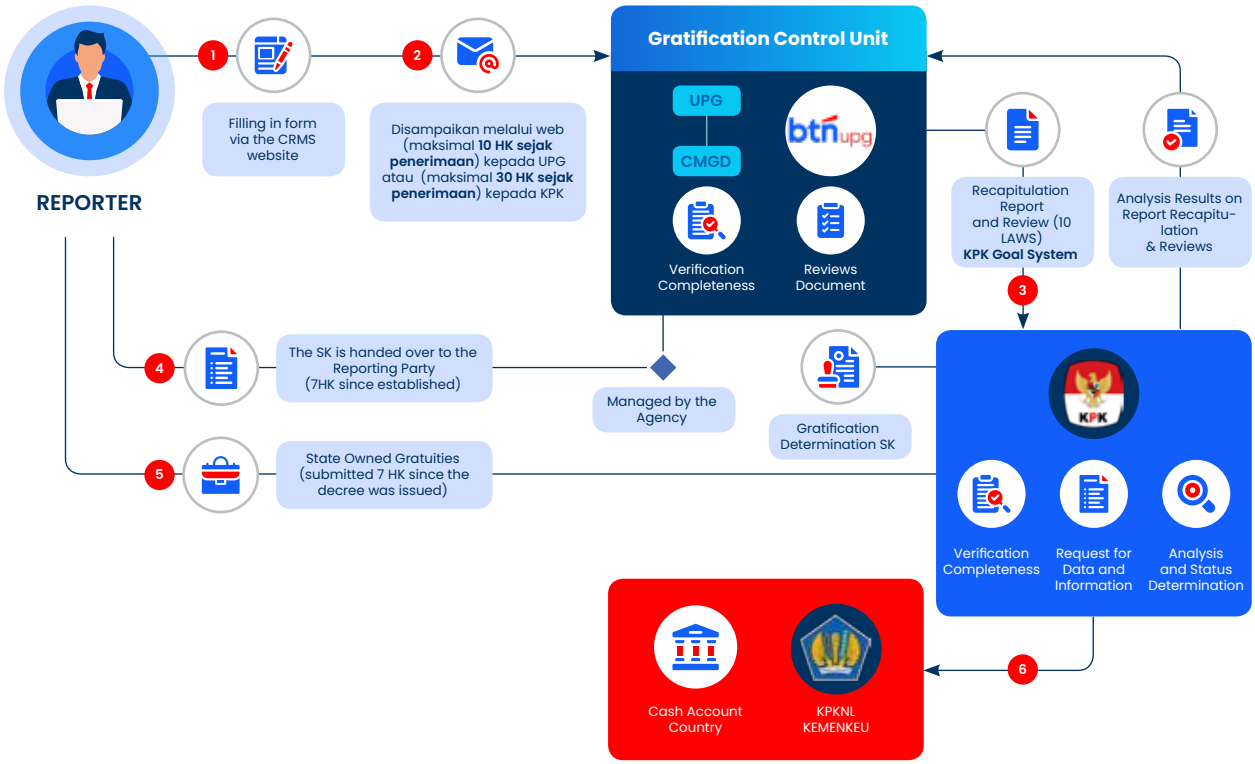
a. General Provisions on Gratituity.
b. Basic Principles of Controlling Gratituity.
c. Gratuity Control Activities.
d. Gratituity Category.
e. Gratituity Reporting Mechanism..
f. Documentation, Reporting, and Monitoring of Gratuities.

Since 2019, Bank BTN had collaborated with the Corruption Eradication Commission (KPK) in the Professional Integrity movement (PROFIT) through the following activities:

1. Participation in training as an Integrity Builder (API) and Anti-Corruption Instructors (PAKSI) to oversee corruption prevention efforts.
2. Participation in the Anti-Corruption campaign collaboration program with KPK through various communication media channels.
3. Self-Assessment on the Adequate Corporate Corruption Prevention Checklist
4. Establishment of the BTN Competency Testing Center (TUK) in 2024
5. Implementation of the Integrity Family Program
6. Commemoration of International Anti-Corruption Day 2024

GRATIFICATION REPORTING MECHANISM

The Company has established a gratuity reporting mechanism as stipulated in Special Policy Number KK.6-A, regarding the Gratuity Control Procedure, Technical Guidelines Number PT.6-A.1, regarding the Implementation Guidelines for Gratuity Control, and Computer Operational Guidelines (POK) Number 01/POK/CMGD/V/2024 regarding the BTN Gratuity Reporting Application, with the following process flow:



Gratification Reporting Mechanism Figure Description:

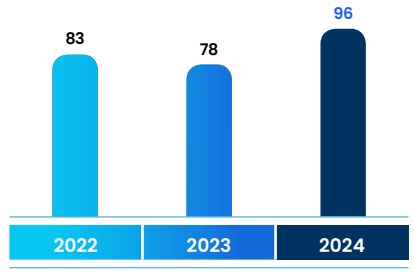
1. Employees report the receipt of Gratification to the Corruption Eradication Commission (KPK) through the UPG (d. CMPD) by filling out forms no later than 10 working days from the date the gratification was received. Gratification received by the reporting party is to be kept by the reporting party until a decree from the KPK regarding the ownership status of the intended gratification is issued.
2. The submission of the form is conducted through the Compliance Regulatory Management System (CRMS) at the following address: https://crms.btn.co.id. The form used in this Circular Letter is adjusted according to the type of gratuity received, with the following explanations:
   a. Using Form 1 if the gratuity is in the form of money or goods.
   b. Use Form 2, if the gratification is obtained from official activities.
   c. Use Form 3, if the gratification is in the form of foods/ drinks/parcels to welcome the holiday season. But if the gratification associated with the holiday season is provided in the form of money/vouchers/goods then continue to use Form 1. Other aspects that must also be considered in completing the data on the form are the inclusion of Work Units, positions, detailed descriptions regarding the chronology/events of the gratification referred to as well as any contact telephone numbers and e-mail addresses provided in the process of clarifying reports by the UPG and the KPK.
   d. Use Form 4 if the gratuity is rejected, accompanied by photographic evidence of the rejection.
3. The UPG continues the Gratification report to the KPK within 10 working days after the Gratification report was received by the UPG. Then the KPK handles the Gratification report which includes the:
   a. Verification of the comprehensiveness of the Gratification report;
   b. Request for additional data and information from the related parties;
   c. Analysis of the receipt of Gratification; and
   d. The determination of the ownership status of the Gratification. The process to determine the status regarding the receipt of Gratification reports is within 30 working days after the Gratification report was received by the KPK in full.
4. The KPK issues a decree regarding the status of the receipt of the gratification to the recipient/reporter of the gratification and copies it to the UPG no later than 7 (seven) working days from the date the Decree is stipulated. If the ownership status of the gratification is determined to be managed by the agency, the gratification is submitted to the UPG to be managed by the Company.
5. In terms of KPK determines the gratuity as state property, the whistleblower/Recipient must hand over the received gratuity to the UPG (i.e., CMGD) no later than seven (7) working days from the date the decision letter is issued. Subsequently, the UPG will transfer the gratuity to the KPK. The KPK will then deliver the item to the Directorate General of State Assets and provide evidence of submission to the whistleblower.

6. In the case of gratuities in the form of money, the whistleblower must deposit the money into the KPK's account and send transfer evidence to the UPG. This evidence will be uploaded to the GOL KPK website as part of the required documentation for gratuity reporting.

GRATIFICATION REPORT: ACCEPTANCE AND REJECTION

Throughout 2024, there were 96 reports of gratification received from the head office and branch offices, which consisted of reports concerning bribery, official gratification, and gratification of parcels in the lead-up to religious holidays or gratification rejection.

Number of Gratification Reports in the Last 3 Years



Based on the comparison of gratuity reports over the past three years, the number of reports in 2024 has increased to 96. This is a positive development, as gratuity reporting reflects employees' compliance with laws and regulations. It also indicates that employees are becoming more aware of and understanding gratuity control while demonstrating a willingness to report any gratuities received.

Anti-Corruption Training and Socialization for Employees

Throughout 2024, the Company has carried out several activities to encourage the effectiveness of gratification control policy implementation, such as:

1. Dissemination through various socialization media regarding the message of anti-gratification to the whole employee as well as the Company stakeholder through the following activities:
   a. Internal dissemination of anti-gratuity and anti-bribery messages through various digital bank media to all employees, including B-Gate, computer wallpaper ads for all employees, and email.
   b. External dissemination of anti-gratuity and anti-bribery messages through various media, including BTN's social media (Instagram, Facebook, Twitter), website, and national print newspapers.
   c. Implementation of e-learning for all company employees on anti-bribery and gratuity control through the Digital Room for E-learning Modules (DREAM) in March 2024.
   d. Circulating an internal memo regarding the prohibition of gratuities ahead of Eid al-Fitr 1445 H to all work units in March 2024.
   e. Branch Visit by the Gratification Control Unit (UPG) as part of the internalization of Gratification at Branch Offices.
   f. Dissemination on the theme of gratification through the installation of posters in the Banking Hall of Branch Offices.
   g. Socialization of anti-gratification infographic messages regarding the prohibition of receiving gratification ahead of Eid al-Fitr 1445 H to stakeholders through the Media Indonesia newspaper in April 2024.
   h. Socialization of infographics in the form of flyers with the theme of gratification through e-mail.
   i. Installation of posters with the theme of International Anti-Corruption Day (Hakordia) on each floor of BTN Tower I in December 2024.
   j. Internalization of infographics on the theme of International Anti-Corruption Day (Hakordia) to all employees through the B-Gate application, WhatsApp blast, and email blast in December 2024.
   k. Dissemination of infographics in the form of a video screening with the theme of International Anti-Corruption Day (Hakordia) **via the LED TV in the Lobby of BTN Tower 1.**
   l. Dissemination of infographics on the theme of International Anti-Corruption Day (Hakordia) to stakeholders through social media platforms such as **Facebook, X(twitter), and Instagram in December 2024.**
   m. Organizing the peak event for the commemoration of International Anti-Corruption Day within the internal environment of the bank on December 19, 2024.
   n. Awarding to Gratification Reporters with the highest number of reports, the highest nominal and inspirational reporters.
   o. Awarding of Inspirational API PAKSI.
   p. Awarding of KC/KCS for Their Active Role in Strengthening Integrity.
   q. Circulating advisories to all employees regarding gratuity control in the context of Religious Holidays and the New Year in December 2024.
   r. Dissemination of infographics related to the prohibition of receiving gratuities during Christmas and New Year 2025.
2. The signing of the Integrity Pact. The Company has an Integrity Pact signing program which is in line with its commitment to implementing ISO 37001:2016 Anti-

Bribery Management System (Sistem Manajemen Anti Penyuapan, SMAP) certification. The Integrity Pact is a statement from all levels of the Company to commit to upholding morals and integrity, protecting and maintaining the image, credibility, and interests of the Company by not soliciting or receiving bribes or gratuities from parties with conflicts of interest. The Integrity Pact is always implemented as well as possible to support the SMAP program and gratification control. The Integrity Pact signed by each employee is uploaded via the Digital Room for E-Learning Modules (DREAM) media

3. E-learning on Gratification Control
   Internalization to all employees on Gratuity Control and Anti-Bribery Management System materials was conducted through the Compliance Excellence program in March 2024 using the Digital Room for E-learning Modules (DREAM) platform. Additionally, an evaluation of the material was carried out through quizzes and feedback sessions on the provided content.
4. Report on the Work Plan for the Gratification Control Program (Program Pengendalian Gratifikasi, PPG) to the KPK
   Based on the KPK letter regarding the Guidelines for Monitoring and Evaluating the Implementation of Gratuity Control in 2024, the Company is required to submit a Gratuity Control Program (PPG) Realization Report to the KPK every semester through the KPK Gratifikasi Online (GOL) application. The Company has submitted the Semester I and II PPG Realization Reports to the KPK with the following details:
   a. Provisions for gratuity control within the Company;
   b. Report on internal and external dissemination through media for anti-gratuity messaging;
   c. E-learning report on Technical Guidance for Gratuity Control;
   d. Report on independent gratuity socialization by the Gratuity Control Unit (UPG);
   e. Technical guidance on PPG implementation;
   f. Report on identifying vulnerable points for gratuity practices;
   g. Report on risk mitigation of vulnerable gratuity practices;
   h. Gratuity reporting;
   i. Reporting on gratuity rejections managed by UPG;
   j. Report on gratuity control innovations
   k. Implementation of ISO 37001:2016 Anti-Bribery Management System (SMAP) certification.
5. In accordance with the Circular Letter of the Corruption Eradication Commission (KPK) Number 18 of 2024 regarding the Appeal for the Organization of World Anti-Corruption Day Activities, Hakordia is commemorated every December 9. The KPK urges all Ministries/Institutions to organize a series of events for the 2024 Hakordia commemoration under the theme "Strengthen Commitment to Eradicate Corruption for an Advanced Indonesia." In line with this, at the Hakordia Commemoration event within the Company on December 19, 2024, the Company presented appreciation to employees who reported gratuities and demonstrated commitment to corruption prevention within the Company. This recognition aims to inspire other employees to uphold the same commitment to corruption prevention, particularly through rejecting and reporting gratuities.

Appreciation is given to gratification reporters in 2023 with 3 (three) categories, namely
a. Gratification reporting category with the highest number of reports.
b. Gratification reporting category with the highest nominal amount.
c. Inspirational Reporter Category.

In addition to awards for gratification reporters, appreciation was also given to API PAKSI Inspiratif BTN, as well as appreciation to Branch Offices/Sharia Branch Offices for their active role in Strengthening Integrity.

Integrity Assessment Survey

The Integrity Assessment Survey (SPI) is a survey to measure the level of corruption risk conducted by the Corruption Eradication Commission. This survey produces recommendations for improving the corruption prevention system and aims to increase awareness of corruption risks and improve the anti-corruption system within the Company's internal environment. Since 2023, as a form of the Company's commitment to preventing corruption, the Company has participated in the Integrity Assessment Survey conducted by the KPK and has become the first BUMN category institution to participate in this SPI survey and has obtained good results for improving control in the Company's internal. The SPI survey uses a probability sampling method for multi-stakeholder internal respondents, external respondents, and experts. In 2024, BTN also re-participated in the SPI survey from the KPK with the survey implementation starting from August - October 2024. The results of the 2024 SPI assessment showed an increase in scores compared to the previous year, including:

2023	2024
77,92	84,36

SPI score assessment category description:
- Vulnerable (<73).
- Alert (73-77).
- Guarded (78-100)

Management of State Officials' Wealth Report (LHKPN)

As a State-Owned Enterprise, the Company consistently strives to maintain compliance with the submission of LHKPN. The basis for the provisions for Management of State Official Wealth Report (LHKPN) is the Regulation of the Corruption Eradication Commission of the Republic of Indonesia Number 07 of 2016 concerning Procedures for Registration, Announcement and Examination of State Officials' Wealth Reports and Regulation of the Corruption Eradication Commission of the Republic of Indonesia Number 02 of 2020 concerning Amendments to Regulation of the Corruption Eradication Commission of the Republic of Indonesia Number 07 of 2016 concerning Procedures for Registration, Announcement and Examination of State Officials' Wealth Reports, in conjunction with KPK Regulation No. 3 of 2024 concerning the Second Amendment to Regulation of the Corruption Eradication Commission Number 07 of 2016 concerning Procedures for Registration, Announcement and Examination of State Officials' Wealth Reports.

The Company's LHKPN Management Policy

The Company is committed to the implementation of LHKPN's obligations with the issuance of Special Policy No. 3C concerning Personnel Regulation and Administration, Chapter VII concerning Human Capital Services and Operations. Based on the Special Policy, Officials within the Company who are required to report LHKPN are as follows:

1. Board of Directors, Board of Commissioners, and Board of Commissioners Organs.
2. Head of Division/Desk (or equivalent), Head of Regional Office.
3. Head of Branch and Head of Sharia Branch.

Number of LHKPN Reporting

No.	Position Category	Amount	% Reporting
1.	Board of Commissioners	8	100%
2.	Board of Directors	10	100%
3.	SEVP	2	100%
4.	Head of Division	40	100%
5.	Head of Regional Office	6	100%
6.	Head of Branch	113	100%
Total Mandatory Report		**179**	**100%**

No.	Year	Report Type	Number of Mandatory	Jumlah Pelaporan	%Kepatuhan
1.	2020	Periodic 2019	158	157	99,37%
2.	2021	Periodic 2020	162	162	100%
3.	2022	Periodic 2021	170	170	100%
4.	2023	Periodic 2022	175	175	100%
5.	**2024**	**Periodic 2024**	**179**	**179**	**100%**

- All BUMN officials are required to report the 2023 Periodic LHKPN online from January 1, 2024, to March 31, 2024, where if there are BUMN officials who do not fulfill this obligation, they may be subject to administrative sanctions.
- Based on this, BTN's Compliance Report on LHKPN Reporting is 100% or all Mandatory Reporters have completed reporting according to the specified deadline, where the level of compliance can be maintained. (position March 31, 2024).

Number of Determination (Internal Fraud) and Resolution Efforts

Internal Fraud in 1 Year	Number of frauds committed (Internal)					
	Members of the Board of Commissioners and Members of the Board of Directors		Permanent employee		Non-Permanent employee	
	Previous Year (2023)	Current Year (2024)	Previous Year (2023)	Current Year (2024)	Previous Year (2023)	Current Year (2024)
Total Fraud	0	0	19	23	0	1
Resolved	0	0	17	19	0	1
In the process of resolution in the Bank Internal	0	0	2	4	0	0
Not yet attempted to be resolved	0	0	0	0	0	0
Has been followed up through the legal process	0	0	2	0	0	0

Note:
1. The number of cases in the current year is based on the Special Audit Result Report and the Initial Review Result Report for the period January - December 2024.
2. The number of cases that are **"Resolved"** are cases that have received a sanction decision from the Board of Directors - December 2024.
3. The number of cases that are **"In the process of being resolved internally in the Company"** are cases that have not received a sanction decision from the Board of Directors until December 2024.
4. The number of cases that are **"Followed up through the legal process"** are cases that **"have been resolved"** and received a criminal sanction decision. The legal process is followed by the Legal Division.

Provision of Funding for Social and/or Political Activities

Provision of Funding for Social Activities is part of the Company's social responsibility. Therefore, information related to the provision of funding for social activities is described in the Social and Environmental Responsibility section which is an integral part of this annual report.

As for providing funds for political activities, during 2024, the Company will not provide funds for political activities or to political parties in accordance with statutory regulations and the Company's code of conduct.

Provision of Funds to Related Parties and Provision of Large Funds

The Company provides funds to related parties and large exposures which are made with the approval of the Company's Board of Commissioners. The Company has never violated the Legal Lending Limit (BMPK) during 2023. The Compliance Director through the Compliance Unit constantly monitors the Company's compliance with the BMPK provisions and reports it to the Financial Services Authority every semester. The implementation of the provision of funds by the Company to related parties and/or the provision of large exposure always takes into account the precautionary principle as well as the applicable laws and regulations and has complied with Bank Indonesia regulations regarding BMPK.

No.	Fund Provider	Amount	
		Debtor	Amount (million rupiah)
1.	To Related Parties	21	5.247
2.	To Core Debtors: a. Individual b. Group	 34 86	 11.567.988 23.372.916

Share Buyback and Bond Buyback

Selama tahun 2024, tidak terdapat *buyback* saham maupun *buyback* obligasi.

Bank Strategic Plan

Information related to the Bank's Strategic Plan has been presented in the Bank's Strategy Sub-Chapter in the Management Analysis and Discussion Chapter in this Annual Report.

Transactions Containing Conflict of Interest

An explanation regarding transactions that contain conflict of interest is presented in the Management Discussion and Analysis Chapter of this Annual Report.

Internal Dispute

Throughout 2024, there was no internal dispute between employees of the Company.

Prevention of Insider Trading

As part of managing potential conflicts of interest, the Company has established a policy regarding Insider Trading actions as regulated in Special Policy No.KK.9-AA of 2023 concerning Investor Relations Activities. In this provision, it is stipulated that the Company's Insiders are prohibited from carrying out Insider Trading activities through purchasing or selling the Company's Securities or other Companies that transact with the Company. The Insiders referred to are as follows:

1. Commissioners, Directors, or Employees of the Company;
2. The major shareholder of the Company;
3. An individual who, because of his position or profession or because of his business relationship with the Company, allows that person to obtain inside information; or
4. Parties who, within the last 6 (six) months, are no longer referred to in points 1, 2, and 3 above.

The prohibition for the Company Insiders who have Insider information to buy or sell the Company's Securities is based on the consideration of the Principle of Disclosure in the Capital Market which results in the creation of equality of information for each party in making investment decisions. Insiders of a bank that conducts transactions with other companies are also subject to a prohibition to conduct transactions in the securities of such other companies, even though the person concerned is not an Insider of such other companies. This is because information about the other company is usually obtained due to the Insider's position in the bank that conducts transactions with the other company. During 2024, there was no insider trading.

Transparency of Financial and Non-Financial Conditions

Explanation regarding the Transparency of Financial and NonFinancial Conditions has been presented in the Sub- Chapter of Transparency for Report Submission in the Chapter of Corporate Governance in this Annual Report.

Implementation of Sustainable Finance, Including the Implementation of Social and Environmental Responsibility

An explanation of the application of sustainable finance, including the application of social and environmental responsibility, has been explained in Bank BTN's 2024 Sustainability Report.

Report of Sharia Business Unit Governance

The Company has established a Sharia Business Unit (UUS) Management, which is designed to guide the Company's management to operate in compliance with the five basic principles of Sharia and is also targeting broader interests. The main interests of concern here include protecting the interests of the stakeholders and increasing compliance with the prevailing laws and regulations and ethical values that apply generally to the Islamic banking industry.

Policies regarding the management of Sharia Business Units (UUS) in the Company refer to several regulations, including the following:

1. Law No. 21/2008 concerning Islamic Banking dated July 16, 2008.
2. Bank Indonesia Regulation No. 11/10/ PBI/2009 Concerning Sharia Business Units as amended by Bank Indonesia Regulation No. 15/14/ PBI/2013.
3. Bank Indonesia Regulation No. 11/33/ PBI/2009 Concerning the Implementation of Good Corporate Governance for Sharia Commercial Banks and Sharia Business Units.
4. Bank Indonesia Circular Letter No. 12/13/ DPbS dated April 30, 2010 concerning the Implementation of Good Corporate Governance for Sharia Commercial Banks and Sharia Business Units.
5. Financial Services Authority Regulation No. 2 of 2024 Concerning the Implementation of Sharia Governance for Sharia Commercial Banks and Sharia Business Units.
6. Financial Services Authority Circular Letter No. 15 of 2024 Concerning the Implementation of Sharia Governance for Sharia Commercial Banks and Sharia Business Units.
7. Decree of the Board of Directors Number 52/SK/DIR/ TPMD/2021 concerning the Organizational Structure of the Head Office and Regional Offices.
8. The Company's Articles of Association.

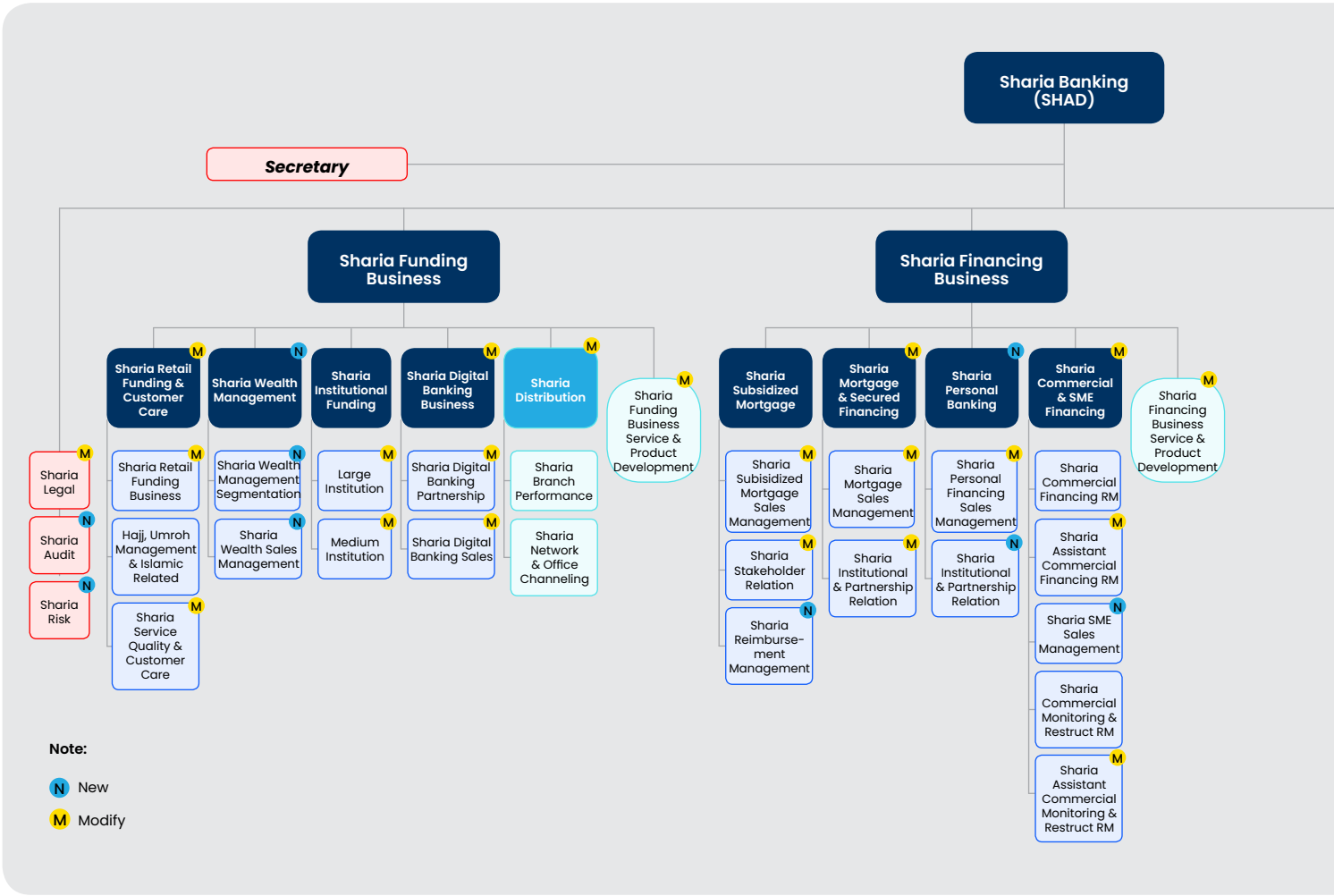
5 (Five) Basic Principles of the Sharia Business Unit (UUS) Governance of the Company

The Company consistently implements and improves the UUS management. Such means is carried out by continuously advancing its services to the customers and the stakeholders according to Sharia Principles which are based on 5 (five) basic principles of GCG, namely:

1. Transparency: directness in providing material, relevant information, and transparency in the decision-making process;
2. Accountability: accuracy and validity of the information presented about the effective Company management in accordance with the purpose;
3. Responsibility: the Company's management adheres to the prevailing laws and principles of a healthy UUS management;
4. Professionalism: possessing competence, ability to act objectively and free from any influence/pressure, and committing to developing Sharia business;
5. Fairness: upholding justice and equality in defending the rights and satisfying the interests of the stakeholders in accordance with the prevailing legislation.

Structure of Sharia Business Unit (UUS) of the Company

The Company's Sharia Business Unit (UUS) is managed by the Director of UUS, who delegates to the Division of UUS and Deputy of UUS, under the supervision of the Sharia Supervisory Board as outlined in the following UUS management structures graph: Report of Sharia Business Unit Governance:



Vision and Mission of Sharia Business Unit

In conducting its operations, the UUS of the Company lives up to the following Vision and Mission statements:

Vision

"Becoming a leading Sharia Bank in housing financing and associated industry".

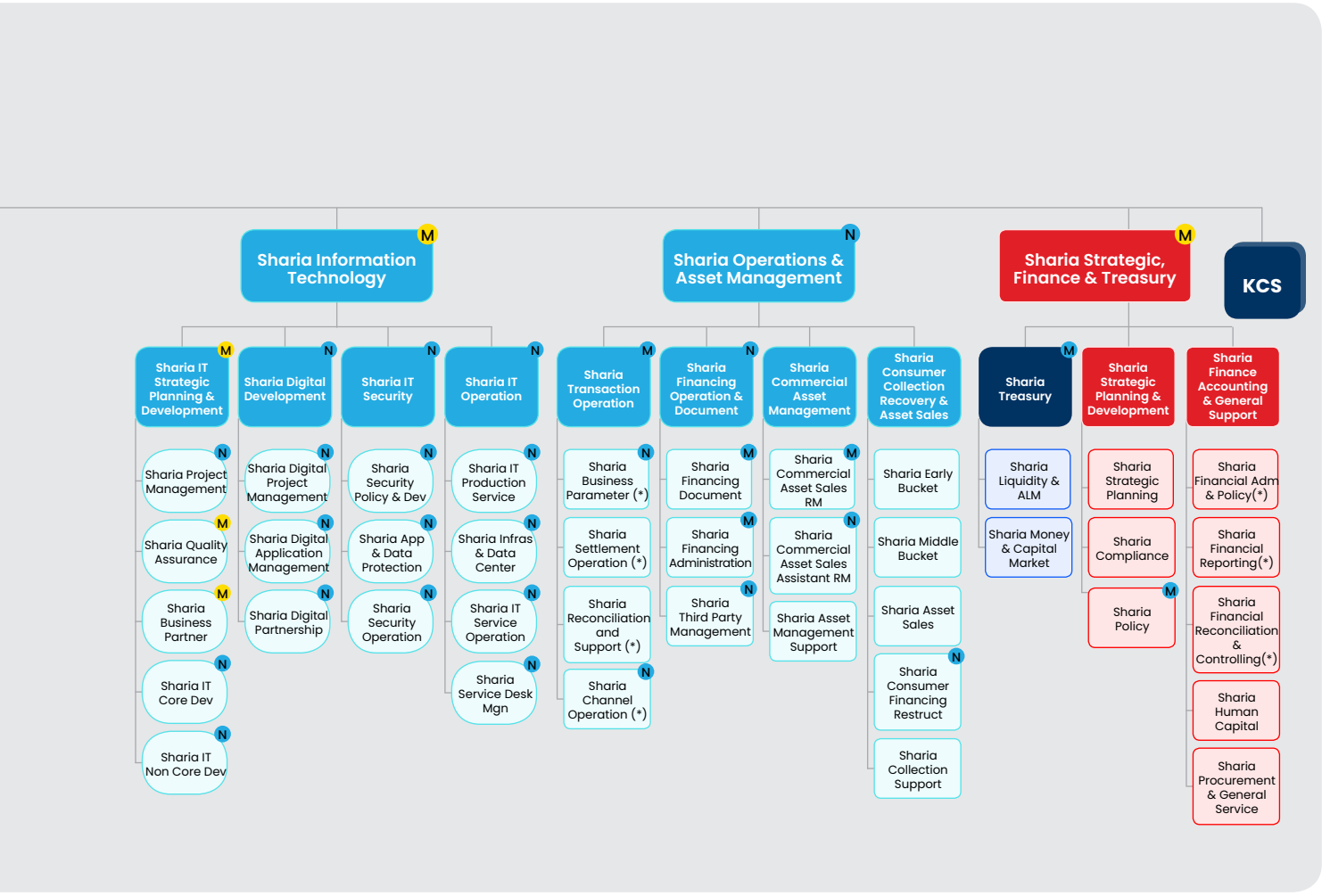
Mission

In achieving the vision above, the Company will undertake the following missions:

1. Providing innovative products, programs, and featured services with a focus on housing financing and associated industry with economical financing resources;
2. Developing human capital of high quality and integrity as well as implementing good Corporate Governance and Compliance;
3. Increasing the competitive advantage with the latest information technology;
4. Caring about the Social and Environmental interest.

Sharia Supervisory Board (DPS)

In order to ensure that the Sharia Financial Institution (LKS) at the implementation level does not deviate from sharia principles, in carrying out its activities the Company is supervised by the Sharia Supervisory Board (DPS) which is tasked with supervising the interests of the Bank over the policies and management of the



Board of Directors to comply with Sharia Principles and is responsible for such supervision, as well as directing, monitoring, and evaluating the implementation of Sharia Governance including the implementation of sharia risk management, sharia compliance, and integrated sharia internal audits as well as the Bank's strategic policies related to the implementation of Sharia Principles, in accordance with the provisions of laws and regulations, articles of association, and/or decisions of the GMS. (Article 20 paragraph (1) and (3) POJK No. 2 of 2024 concerning the Implementation of Sharia Governance for Sharia Commercial Banks and Sharia Business Units).

Appointment of The Sharia Supervisory Board (DPS) Members

A member of the Sharia Supervisory Board must possess several relevant qualities, including:

1. Integrity, e.g.:
   a. Good personality and morals.
   b. Legally competent.
   c. Committed to complying with and practicing the Sharia Supervisory Board Charter, sharia banking provisions, and other prevailing regulations in a professional manner.

   d. Committed to the development of healthy and solid sharia banking.
   e. Unlisted in the fit and proper no-pass list as set forth in the terms of fit and proper test regulated by the Financial Services Authority (OJK).
   f. Never been committing fraud (scam, embezzlement, and/or other fraudulent conduct) in banking, finance, and other areas of business, nor prosecuted for criminal acts (as evidenced by a statement from the person concerned).
2. Competence; at least possessing related knowledge and experience in Sharia Economic Law as proven with approval/recommendation letter from DSN-MUI, and general knowledge in banking and/ or financial sector. To improve their competency, the DPS members must be willing to continuously develop through education and training. This includes an induction program as a medium of learning about the Company in a relatively brief time to carry out their duties effectively and efficiently
3. Reputation; within at least 5 (five) years before being nominated and during their term of office:
   a. Unlisted in the blacklist and non-performing list managed by Financial Services Authority (OJK).
   b. Having never been declared bankrupt.
   c. Having never been a shareholder, commissioner, or director of a company and/or manager of a business entity declared guilty of causing a company and/or a business entity to be declared bankrupt.
   d. Having never been convicted due to a criminal offense against state finances and/or associated with the financial sector.
   e. Having never been a director or commissioner whom while holding the position do the following:
      1) failed to conduct the annual GMS.
      2) whose accountability as such director and/ or commissioner was once unacceptable to a GMS.
      3) caused an OJK-licensed, approved, or registered company to fail to meet the obligation of submitting the annual report and/ or financial statement to the OJK.

Procedure Appointment of Sharia Supervisory Board (DPS) Members

The Sharia Supervisory Board (DPS) member is appointed through the following stages:

1. The Remuneration and Nomination Committee recommends member candidates to the Board of Commissioners.
2. In case a member of the Remuneration and Nomination Committee has a conflict of interest with a candidate for the DPS member, the reason for disagreement must be disclosed in the recommendation.
3. From this recommendation, the Board of Commissioners via the Board of Directors proposes the candidate to National Sharia Council – Indonesian Ulema Council.
4. DSN-MUI determines whether to approve or disapprove of the prospective candidates proposed by the Board of Directors.
5. The Board of Directors must submit an approval request to Financial Service Authority (OJK) for the prospective candidate.
6. OJK approves or disapproves of the prospective candidates.
7. The candidate who has received approval from DSN-MUI and FSA is appointed in the GMS.
8. Such an appointment before obtaining approval from the Financial Service Authority (OJK) must be reported by the Company to OJK no later than 10 (ten) calendar days following the date of appointment.
9. The candidate whose the position has yet to be effective has not yet assumed their duties and responsibilities as a DPS member and is unable to make legally binding decisions. Consequently, they are not entitled to the rights and obligations of a DPS member.
10. In the event that DPS members are not appointed by the GMS within a period of 3 (three) months from the date in question, it becomes invalid.

Structure, Number, and Composition of Sharia Supervisory Board

The appointment of the Company's Sharia Supervisory Board has been based on the requirements of the Sharia Supervisory Board in accordance with OJK Regulation Number 2 of 2024 concerning the Implementation of Sharia Governance for Sharia Commercial Banks and Sharia Business Units, namely that members of the Sharia Supervisory Board must have integrity, competence and good reputation.

The composition of the DPS membership as regulated in the Supervisory Board Charter is as follows:

1. DPS must consist of at least 2 (two) people and 3 (three) people at most.
2. DPS is chaired by a chairperson appointed from one of its members.
3. DPS members are appointed by GMS.

Changes and Composition of the Sharia Supervisory Board in 2024

Information regarding the Changes and Composition of the Sharia Supervisory Board can be seen in the Company Profile Chapter in the Profile of the Company's Sharia Supervisory Board section in this Annual Report.

Profile of Sharia Supervisory Board

Information regarding education, work experience, DPS appointment period, concurrent positions, and affiliations is available in the Chapter of Company Profile in the Profile section of the Company's Sharia Supervisory Board in this Annual Report.

Term of Office of Sharia Supervisory Board

1. The term of office of DPS members must be determined to be no longer the same as the term of office of members of the Board of Commissioners.
2. The Bank stipulates in its articles of association regarding:
   a. the term of office of DPS members starting from the effective date of the appointment of DPS members by the GMS; and
   b. other conditions in fulfilling the position of DPS members.
3. DPS members serve for a certain period of time and may be reappointed after obtaining approval from the GMS, for a maximum of 2 (two) consecutive terms of office.
4. DPS members who have served for 2 (two) consecutive terms of office may be reappointed for the next period as DPS members by considering:
   a. results of the DPS member performance assessment;
   b. results of external reviews related to the implementation of DPS member duties; and
   c. statements by DPS members in the GMS regarding the independence of the person concerned.
   (Article 14 paragraph (1) to (4) OJK Regulation 2 of 2024)

Work Guidelines, Duties, and Responsibilities of Sharia Supervisory Board

DPS has a Sharia Supervisory Board Charter which was ratified through the Decree of the Sharia Supervisory Board No. 03/DPS-BTN/VII/2024 dated July 19, 2024. The Sharia Supervisory Board Charter is prepared based on sharia principles, provisions of the Articles of Association, applicable laws and regulations, Shareholder directions and best practices. Good Corporate Governance.

The Charter serves as the guidelines for DPS in performing its duties in a more organized and effective manner. Below is the content of the charter:

Chapter I	General Provisions, Purpose of Charter Establishment
Chapter II	DPS Duties, Responsibility, and Authority
Chapter III	Membership and Composition of the Board
Chapter IV	Remuneration and Facilities, Meeting, Minutes
Chapter V	Supporting Work Unit for the Implementation of DPS Duties and Responsibilities
Chapter VI	Others

Duties and Responsibilities of Sharia Supervisory Board

The Sharia Supervisory Board is responsible to provide advice and suggestion to the Director of UUS and to monitor UUS activities so as to remain in accordance with sharia principles. The duties and responsibilities of DPS include:

1. Conduct supervision for the interests of the Bank on policies and the management of the Board of Directors to ensure that they are in accordance with Sharia Principles and are responsible for such supervision, and provide advice to the Board of Directors including providing sharia opinions related to the Bank's activities.
2. Direct, monitor, and evaluate the implementation of Sharia Governance including the implementation of sharia risk management, sharia compliance, and integrated sharia internal audits as well as the Bank's strategic policies related to the implementation of Sharia Principles, in accordance with the provisions of laws and regulations, articles of association, and/or decisions of the GMS.

3. Assess and ensure compliance with Sharia Principles on operational guidelines and Sharia-related products issued by the Bank;
4. Supervise the Bank's new Sharia-related product development process to ensure that it is in accordance with the DSN-MUI fatwa;
5. Provide sharia opinions on new products and/or restructured financing related to Sharia by referring, among others, to the DSN-MUI fatwa and provisions governing the implementation of Sharia Principles and UUS business activities;
6. Request a fatwa from DSN-MUI for new Sharia-related Bank products for which there is no fatwa;
7. Conduct periodic reviews of the fulfillment of Sharia Principles for the mechanism of fund collection and distribution of funds and Bank service provision;
8. Request data and information related to Sharia aspects from Bank work units that carry out and/ or are related to Sharia activities in the context of carrying out their duties;
9. Carry out duties and responsibilities in accordance with the principles of Good Governance (GCG);
10. Supervise the development of new Sharia-related Bank products:
    a. Request for clarification from the Board of Directors and/ or relevant Company officials regarding the objectives and characteristics of the new products to be promoted.
    b. Ensure the availability of fatwa from DSN-MUI for the new products:
        1) In the case that the fatwa is available, DPS shall tailor the contract of such products with the fatwa.
        2) In the case the fatwa is not yet available, DPS shall propose to the Board of Directors to complement the new product with a fatwa.
    c. Review the suitability of the system and procedures of the new products to be promoted in compliance with sharia principles.
    d. Provide advice on sharia over the new products.
    e. Evaluate the compliance with sharia principles over the policies and procedures to manage risks inherent in the Company's new products and/ or activities.
11. Supervising the UUS activities.
    a. Conduct supervision of the Board of Directors' follow-up on audit findings or examinations and recommendations from the Bank's internal audit work unit, external auditors, the results of supervision by the Financial Services Authority, and/or the results of supervision by other authorities and institutions, related to the implementation of Sharia Principles.
    b. Analyze reports submitted by and/or requested from the Board of Directors, implementation of internal audit functions and/or compliance functions to determine the quality of implementation of Sharia Principles for fund raising and fund distribution activities and Bank service provision;
    c. Set the number of transaction spot checks (sample) to be examined in view of sharia principles implementation quality of each activity.
    d. Examine the spot-checked transaction document (sample) to acknowledge compliance with sharia principles as required in the internal policies, including:
        - The document of **goods purchasing** for the murabahah contract as proof of the murabahah transaction.
        - The document of **customer business report** for the mudharabah/musyarakah contract as a basis for yielding distribution calculation.
        - Availability of **ownership documents for the goods being rented,** for contracts related to renting, including: ijarah contracts, ijarah muntahiya bi al tamlik contracts and musyarakah mutanaqishah contracts, as evidence of the fulfillment of the pillars and conditions of ijarah.
    e. Conduct inspections, examinations, requests for information and/or confirmation to UUS employees and/or customers to strengthen the results of document examinations as referred to in point 11.3, if necessary;
    f. Review the internal sharia policy in case of inconsistency between the principle and the activity.
    g. Provide advice on sharia over the fundraising and distribution as well as banking services by UUS.
    h. Report the DPS supervision result to OJK using an established format at least 2 (two) months following the end of each semester.
    i. Provide sufficient time to best perform their duties and responsibilities.
12. Bank Risk Management:
    a. Conduct an evaluation (review) of UUS risk management policies related to compliance with sharia principles at least 1 (once) a year.
    b. Carry out evaluate the responsibility of the Board of Directors for the implementation of risk management policies related to compliance with sharia principles at least on a quarterly basis.

Concurrent Position Policy of Sharia Supervisory Board

DPS members are prohibited from holding concurrent positions:

1. As a member of the board of directors, member of the board of commissioners, or executive officer at a financial institution or financial company, either a bank or non-bank;
2. As a member of the DPS at more than 1 (one) other Bank;
3. As a member of the Sharia Supervisory Board at more than 2 (two) financial institutions other than Banks;
4. As a member of the board of directors, member of the board of commissioners, sharia supervisor, or executive officer at more than 1 (one) non-financial institution or company, whether domiciled in or outside the country.
5. In the field of functional duties at a bank financial institution and/or non-bank financial institution domiciled in or outside the country;
6. As a public official;
7. In other positions that may give rise to a conflict of interest in carrying out duties as a member of the DPS; and/or
8. In other positions in accordance with statutory provisions.

Name	Position	Position at other companies/ Institutions	Name of the other company/ institution
Prof. Dr. H. Muhammad Quraish Shihab, M.A.	Chairman of Sharia Supervisory Board	Ketua DPS	CIMB Niaga
H. Mohammad Bagus Teguh Perwira, Lc., M.A.	Member of Sharia Supervisory Board	Member of Sharia Supervisory Board	OCBC NISP
		Chairman of Sharia Supervisory Board	Manulife Aset Manajemen Indonesia
Muhammad Faiz, Lc., M.A.	Member of Sharia Supervisory Board	Member of Sharia Supervisory Board	PT Indomobil Multi Finance Indonesia Syariah
		Member of Sharia Supervisory Board	PT Bank Tabungan Pensiunan Nasional (BTPN) Syariah

Management of Conflict of Interest In Sharia Supervisory Board

The Sharia Supervisory Board members must avoid or prevent any potential conflict of interest. In case of conflict of Interests, they are prohibited from taking any action that could harm or reduce the profit of the Company. They must also disclose such a situation in every decision and inform the Board of Commissioners.

The Sharia Supervisory Board members are subject to any regulations on conflict of interests and other regulations applicable to the Company. Whenever encountering conflict of interest, DPS members shall:

1. Make a written report submitted to the Board of Commissioners on any potential or actual conflicts of interest which significantly influence the Company's finance and the reputation of the Company, the Board of Commissioners, DPS, and the Board of Directors.
2. Not participate in the assessment process on any activities inflicting such conflicts of interest.
3. Participate in meetings, but not in the decision-making.

Share Ownership of the Sharia Supervisory Board

Name	Position	Shareholding			
		Bank BTN	Other Banks	Non-Bank Financial Institutions	Other Companies
Prof. Dr. H. Muhammad Quraish Shihab, M.A.	Chairman	Nil	Nil	Nil	Nil
H. Mohammad Bagus Teguh Perwira, Lc., M.A.	Member	Nil	Nil	Nil	Nil
Muhammad Faiz, Lc., M.A.	Member	Nil	Nil	Nil	Nil

Implementation of DPS's Activity Report

Sharia Supervisory Board Meeting Policy

The DPS meeting is a forum for deliberation between DPS members to discuss every strategic and operational policy and decision in order to carry out the supervisory function, provide advice and suggestions to the Board of Directors and UUS management in the field of sharia to comply with sharia principles. In order to make decisions, the DPS can ask for consideration from the DSN-MUI if necessary. The DPS meeting is held with the following provisions:

1. DPS meetings must be held periodically at least 1 (one) time in 1 (one) month or 12 (twelve) times in 1 (one) year. In certain situations and needs. DPS can hold meetings more than 1 (one) time in one month.
2. DPS meetings are held if attended by the majority of DPS members, the implementation of DPS meetings must be attended by all DPS members physically at least 2 (two) times in 1 (one) year.
3. DPS meeting invitations can be made in writing or can be done via electronic media such as email, whatsapp and others. Invitations are sent to each DPS member no later than 5 (five) calendar days before the DPS meeting is held. If there is an urgent need, invitations can be made 3 (three) calendar days before the DPS meeting is held.
4. DPS must prepare a DPS meeting schedule for the following financial year before the end of the financial year.
5. DPS meetings must be held in the territory of Indonesia, but if they are held outside the territory of Indonesia, the meeting decision is considered valid only if attended by all DPS members.
6. Decision-making at the DPS meeting must first be carried out based on deliberation to reach consensus. If deliberation is not achieved, decision-making at the DPS meeting is carried out based on the majority vote.
7. Voting is generally carried out verbally, but under certain conditions and according to mutual agreement, voting can be carried out by closed letter.
8. DPS members who are present at the meeting but are not in the meeting room at the time of decision-making for some reason, then the relevant voting rights are considered blank/not giving voting rights.
9. Each DPS member who is present has the right to cast 1 (one) vote.
10. DPS members who are unable to attend the DPS meeting must inform the DPS Chairperson of their absence through the DPS Secretary.
11. Meetings are held at the Bank/UUS Head Office, but with certain considerations and mutual agreement, meetings can be held at one of the branch offices throughout Indonesia or outside the branch office.
12. Meetings can be held via teleconference technology (each other can hear and see each other, each meeting participant can see and hear each other directly and participate in the DPS meeting.
13. In certain conditions where it is not possible to hold a DPS meeting, then DPS decisions can be submitted in writing by means of circulation.
14. All DPS decisions stated in the minutes of the meeting are joint decisions and are binding on all DPS members.
15. Differences of opinion (dissenting opinions) that occur in DPS meetings must be clearly stated in the minutes of the meeting along with the reasons for the differences of opinion.
16. The results of DPS meetings must be stated in the minutes of the meeting and properly documented.

Internal Meeting Of The Sharia Supervisory Board

No.	Date	Meeting agenda	Participant	Attendance
1.	January 8, 2024	• Progress of Spin Off UUS BTN	Prof. Dr. H. Muhammad Quraish Shihab, M.A.	present
			H. Mohammad Bagus Teguh Perwira, Lc., M.A.	present
			Muhammad Faiz, Lc., M.A.	present
2.	February 21, 2024	• Sharia Securities (SUKUK) Assignment Transaction Mechanism • Flow and Approval of Charity Funds • UUS Performance in January 2024	Prof. Dr. H. Muhammad Quraish Shihab, M.A.	present
			H. Mohammad Bagus Teguh Perwira, Lc., M.A.	present
			Muhammad Faiz, Lc., M.A.	present
3.	March 18, 2024	• UUS Performance in February 2024 • Cash Waqf Linked Deposit (CWLD) • Auction of Goods Stored in Safe Deposit Box (SDB)"	Prof. Dr. H. Muhammad Quraish Shihab, M.A.	present
			H. Mohammad Bagus Teguh Perwira, Lc., M.A.	present
			Muhammad Faiz, Lc., M.A.	present
4.	April 25, 2024	• Feature Development: Deposit without Bill • UUS Performance in March 2024	Prof. Dr. H. Muhammad Quraish Shihab, M.A.	present
			H. Mohammad Bagus Teguh Perwira, Lc., M.A.	present
			Muhammad Faiz, Lc., M.A.	present
5.	May 29, 2024	• Implementation of Revenue Recording and Distribution of Sukuk Profit Sharing • Restructuring with Tiered Installments • Addition of Gold Conversion Services to Gold Savings • DPS Charter • Performance of UUS BTN April 2024	Prof. Dr. H. Muhammad Quraish Shihab, M.A.	present
			H. Mohammad Bagus Teguh Perwira, Lc., M.A.	present
			Muhammad Faiz, Lc., M.A.	present
6.	June 19, 2024	• UUS BTN Performance Highlights May 2024 • Pre-Realization Costs Enter Ceiling for Murabahah, Istishna and Musyarakah Mutanaqisah Contracts	Prof. Dr. H. Muhammad Quraish Shihab, M.A.	present
			H. Mohammad Bagus Teguh Perwira, Lc., M.A.	present
			Muhammad Faiz, Lc., M.A.	present
7.	July 26, 2024	• New Bancassurance Partner • Report on Charity Funds for Quarter II of 2024 • Highlights of BTN UUS Performance in June 2024	Prof. Dr. H. Muhammad Quraish Shihab, M.A.	present
			H. Mohammad Bagus Teguh Perwira, Lc., M.A.	present
			Muhammad Faiz, Lc., M.A.	present
8.	August 21, 2024	• UUS BTN Performance Highlights July 2024 • The Role of Sharia Risk Management in Supporting Sustainable Business Growth	Prof. Dr. H. Muhammad Quraish Shihab, M.A.	present
			H. Mohammad Bagus Teguh Perwira, Lc., M.A.	present
			Muhammad Faiz, Lc., M.A.	present
9.	September 27, 2024	• Mechanism for Imposing Fines/Ta'zir on Commercial Financing • Life Insurance Using Ciputra Life • Changes in the Provisions on Savings Administration Fees with Mudharabah Contracts • Highlights of BTN UUS Performance in August 2024 • Acquisition Process of Sharia Commercial Banks	Prof. Dr. H. Muhammad Quraish Shihab, M.A.	present
			H. Mohammad Bagus Teguh Perwira, Lc., M.A.	present
			Muhammad Faiz, Lc., M.A.	present
10.	October 29, 2024	• Transfer of Financing from UUS to BUS in the context of Spin Off • MMQ and Istishna Contracts for the KPR Zero Program Feature on KPR Indent iB and BTN iB Property Financing • Conversion of Murabahah Contract Customers to MMQ/IMBT Contracts • UUS Performance Highlights September 2024 • Submission of DPS Opinion • Report on Charity Funds for Quarter III of 2024	Prof. Dr. H. Muhammad Quraish Shihab, M.A.	present
			H. Mohammad Bagus Teguh Perwira, Lc., M.A.	present
			Muhammad Faiz, Lc., M.A.	present

No.	Date	Meeting agenda	Participant	Attendance
11.	November 19, 2024	• Recovery Plan Announcement • BTN UUS Performance Highlights October 2024 • Expansion of BTN iB Sejahtera KPR Product Contract Using Musyarakah Mutanaqisah Contract • Recruitment of Non-Muslim Human Resources (SDI) • DPS Work Plan for 2025	Prof. Dr. H. Muhammad Quraish Shihab, M.A.	present
			H. Mohammad Bagus Teguh Perwira, Lc., M.A.	present
			Muhammad Faiz, Lc., M.A.	present
12.	December 20, 2024	• Highlights of BTN UUS Performance November 2024 • Disbursement of Indent Mortgage Products Using the Istishna Agreement Disbursed 100% in Advance to Developers and Financing Agreements for Indent Mortgage Products Using the MMQ Agreement	Prof. Dr. H. Muhammad Quraish Shihab, M.A.	present
			H. Mohammad Bagus Teguh Perwira, Lc., M.A.	present
			Muhammad Faiz, Lc., M.A.	present

Joint Meeting of The Board of Directors With The Sharia Supervisory Board

Throughout 2024, the Board of Directors held a Joint Board of Directors Meeting with the Sharia Supervisory Board initiated by the Board of Directors 3 (three) times. In detail, the following table shows the Joint Board of Directors Meeting with the Sharia Supervisory Board.

No.	Meeting Date	Meeting agenda	Participant	Attendance
1.	April 25, 2024	**Compliance Director Coordination Meeting with Sharia Supervisory Board** 1. Submission of Performance Review of UUS BTN performance until December 2023; 2. Follow-up of the agreement of the previous coordination meeting on September 1, 2023; 3. The results of DPS supervision activities through the petik test conducted until December 2023 at the Syariah Branch Office; 4. Submission of POJK Sharia Governance	Prof. Dr. H. Muhammad Quraish Shihab, M.A.	Hadir
			H. Mohammad Bagus Teguh Perwira, Lc., M.A.	Hadir
			Muhammad Faiz, Lc., M.A.	Hadir
2.	August 12, 2024	a. DPS Supervisory Activities in the first semester of 2024; b. Sharia Opinion in 2024; c. Sharia Petition Test Results Semester 1 Year 2024; d. DPS Work Plan for 2024; e. Implementation of POJK 2 Year 2024.	Prof. Dr. H. Muhammad Quraish Shihab, M.A.	Hadir
			H. Mohammad Bagus Teguh Perwira, Lc., M.A.	Hadir
			Muhammad Faiz, Lc., M.A.	Hadir
3.	December 16, 2024	a. DPS Supervisory Activities Semester 2 Year 2024; b. DPS Opinion Semester 2 Year 2024; c. Sharia Petik Test Results Semester 2 Year 2024; d. DPS Work Plan for 2025.	Prof. Dr. H. Muhammad Quraish Shihab, M.A.	Hadir
			H. Mohammad Bagus Teguh Perwira, Lc., M.A.	Hadir
			Muhammad Faiz, Lc., M.A.	Hadir

Meeting of The Board of Commissioners with The Sharia Supervisor Board

Based on OJK Regulation No. 2 of 2024 dated February 16, 2024, regarding the Implementation of Sharia Governance for Sharia Commercial banks and Sharia Business Units, Article 31 paragraph (3), banks are required to hold meetings between the Sharia Supervisory Board and the Board of Commissioners at least once every four (4) months. The Board of Commissioners and the Sharia Supervisory Board have agreed that these meetings will be held at least once every four (4) months upon invitation from the Board of Commissioners. However, if necessary, the meetings may be conducted at any time, initiated by either party or both parties.

These meetings are conducted under the Guidelines and Code of Conduct for the Board of Commissioners and the Charter of the Sharia Supervisory Board.

Realization of the Meetings between the Board of Commissioners and the Sharia Supervisory Board

Throughout 2024, the Board of Commissioners held meetings with the Sharia Supervisory Board 3 (three) times. Below is a detailed table of the meetings between the Board of Commissioners and the Sharia Supervisory Board.

Table of Meetings Between the Board of Commissioners and the Sharia Supervisory Board

No.	Meeting Date	Meeting agenda	Peserta	Kehadiran
1.	April 30, 2024	Implementation of OJK Regulation Number 2 of 2024 on the Application of Sharia Governance of Sharia Commercial Banks and Sharia Business Units	Prof. Dr. H. Muhammad Quraish Shihab, M.A.	present
			H. Mohammad Bagus Teguh Perwira, Lc., M.A.	present
			Muhammad Faiz, Lc., M.A.	present
2.	August 28, 2024	Supervisory Activities of the Sharia Supervisory Board on Policies and Implementation of Sharia Principles as of Semester I of 2024	Prof. Dr. H. Muhammad Quraish Shihab, M.A.	present
			H. Mohammad Bagus Teguh Perwira, Lc., M.A.	present
			Muhammad Faiz, Lc., M.A.	present
3.	December 18, 2024	1. Supervisory Activities of the Sharia Supervisory Board on Policies and Implementation of Sharia Principles as of Q3 2024 and Projections through Q4 2024 2. Supervision Plans of the Sharia Supervisory Board for the Sharia Business Unit of PT Bank Tabungan Negara (Persero) Tbk for 2025	Prof. Dr. H. Muhammad Quraish Shihab, M.A.	present
			H. Mohammad Bagus Teguh Perwira, Lc., M.A.	present
			Muhammad Faiz, Lc., M.A.	present

Frequency and Attendance of Meetings

Name	Position	Joint Meeting with UUS Management			Joint Meeting of the Board of Directors			Joint Meeting of the Board of Commissioners		
		Attendance Number and Percentage			Jumlah dan Persentase Kehadiran			Jumlah dan Persentase Kehadiran		
		Number of Meeting	Number of Attendance	Percentage	Number of Meeting	Number of Attendance	Percentage	Number of Meeting	Number of Attendance	Percentage
Prof. Dr.H.Muhammad Quraish Shihab, M.A.	Chairman	12	12	100%	3	3	100%	3	3	100%
H. Mohammad Bagus Teguh Perwira, Lc., M.A.	Member	12	12	100%	3	3	100%	3	3	100%
Muhammad Faiz, Lc., M.A.	Member	12	12	100%	3	3	100%	3	3	100%

Frequency and Procedures of Advice-Giving Supervision of Sharia Principle Implementation in the Capital Market for Issuers or Public Companies

In providing advice and suggestions as well as supervising the fulfillment of sharia principles, the Sharia Supervisory Board carries out this through the issuance of fatwas, opinions, periodic reviews and meetings with the Board of Commissioners and/or Directors and coordinating with the relevant Divisions.

Throughout 2024, DPS has issued 27 (twenty seven) Sharia Supervisory Board Opinions. These DPS opinions were issued in response to the development of UUS BTN's business so that it continues to run in accordance with Sharia Principles.

No.	Date	Opinion
1.	February 21, 2024	Securities Assignment Transaction Mechanism (Sukuk)
2.	February 21, 2024	Flow and Approval of Benevolent Funds or Funds That May Not Be Recognized as Income (TBDSP Funds)
3.	March 18, 2024	Cash Waqf Linked Deposit (CWLD)
4.	March 18, 2024	Auction of Items Stored in Save Deposit Box (SDB)
5.	March 19, 2024	Response to Special Policy on Consumer Financing Procedures Subrogation, Novation Customer Transfer, and Assignment
6.	April 25, 2024	Deposit Without Bill
7.	May 29, 2024	Implementation of Revenue Recording and Distribution of Sukuk Profit Sharing
8.	May 29, 2024	Restructuring with Graduated Installments
9.	May 29, 2024	Addition of Gold Conversion Service to Gold Savings
10.	June 19, 2024	Pre-Realization Costs Become a Component of the Financing Ceiling for Murabahah, Istishna and Musyarakah Mutanaqisah Contracts
11.	September 27, 2024	Life Insurance Using CIputra Life Products
12.	September 27, 2024	Proposed Changes to the Mechanism for Imposing Ta'zir Fines on Commercial Financing
13.	September 27, 2024	Changes to the Mudharabah Savings Account Administration Fee Provisions
14.	October 3, 2024	Addition of New Bancassurance Partners
15.	October 29, 2024	MMQ and Istishna Contracts for the Zero Mortgage Program Feature on BTN Inden iB Mortgage and BTN iB Property Financing
16.	October 29, 2024	Conversion of Murabahah Contract Customers to MMQ and IMBT Contracts
17.	November 7, 2024	Mobile Banking
18.	November 19, 2024	Initiation of the 2025 Recovery Plan of PT. Bank Tabungan Negara (Persero), Tbk
19.	November 19, 2024	Expansion of the BTN iB Sejahtera KPR Agreement using the Musyarakah Mutanaqisah Agreement
20.	November 19, 2024	Recruitment of Non-Muslim Human Resources (SDI)
21	December 9, 2024	Internal Material on the Internal Control System for Financial Reports in General Policy Number KU.7 Concerning the Internal Control System
22	December 20, 2024	Announcement of General Policy No. KU.1 concerning Bank Loan or Financing
23	December 20, 2024	Announcement of Special Policy No. KK.8-J on Risk Management Procedures
24	December 20, 2024	Disbursement of Indent Mortgage Using Istishna Contract is Disbursed 100%
25	December 20, 2024	Use of BTN Retail Credit Risk Division (RCRD) Organ
26	December 20, 2024	iB Multi-Benefit Financing (Murabahah) for Purchasing Grave Plots
27	December 20, 2024	Announcement of General Policy Number KU.2 on Treasury, Funding and Product Delivery

Performance Assessment of DPS

Procedure of Performance Assessment of DPS

Sharia Supervisory Board performance evaluation is carried out for a period of 1 (one) year. In the first stage, DPS members evaluate their performance using the self-assessment method. In the second stage, Remuneration and Nomination Committee will discuss the results of the self-assessment and performance assessment of DPS and use them as input to the Board of Commissioners to be subsequently determined by the Annual GMS.

Criteria of Performance Assessment of DPS

The DPS performance assessment is carried out by looking at the implementation of DPS duties and responsibilities during 2024 which consists of 3 aspects, namely:

1. Aspect of Reporting;
2. Aspect of Giving Consideration, Direction and Supervision of Sharia Principles; and
3. Aspect of Sharia Scientific Development.

Party Entitled to Conduct The Assessment

DPS conducted a self-assessment on its performance in 2024 in the DPS internal meeting. The assessment is conducted by evaluating the achievement of DPS performance indicators throughout 2024. In the evaluation process, DPS coordinates with the DPS secretariat unit in terms of administration, documentation and data so that the performance evaluation process can be carried out accurately.

Results of Performance Assessment of DPS

During 2024, DPS has carried out its duties and responsibilities well. In the Provision Aspect in 2024, DPS has reported on the Supervisory Results Report of the Sharia Supervisory Board for Semester II of 2023 and Semester I of 2024 in a timely manner. In the Provision of Consideration, Direction and Supervision of Sharia Principles Aspect, DPS has held 18 (eighteen) DPS meetings, including 2 (two) meetings with the Enterprise Risk Management Division (ERMD), 3 (three) meetings with the Board of Directors and 3 (three) meeting with the Board of Commissioners. DPS has issued 27 (twenty seven) sharia recommendation opinions during 2024. For the Supervision Aspect, DPS has also conducted Sharia spot checks on the operational activities of KCS in order to ensure the fulfillment of Sharia principles for the operations and business of UUS BTN. The number of spot checks carried out was 13 (thirteen) KCS. In terms of the Sharia Scientific Development Aspect, DPS has participated in a number of activities in order to improve competency related to the duties and responsibilities of the Sharia Supervisory Board implemented by the Regulator, DSN-MUI or other educational institutions (both domestic and foreign). This performance has met the requirements of the duties and responsibilities of the Sharia Supervisory Board.

Remuneration and Other Facilities for DPS

The DPS Charter organizes the terms of salary or honorarium or remuneration and/or benefits for DPS members as stipulated by GMS. In the event that the GMS delegates the Board of Commissioners to determine the amounts, the decision will be made in the Board of Commissioners' meeting by taking into account the recommendations from the Remuneration and Nomination Committee.

Remuneration for Sharia Supervisory Board (DPS) in 2024

Types of Remuneration and Other Facilities	Chairman		Member	
	Person	In Million Rupiah	Person	In Million Rupiah
Remuneration				
Honorarium/Salary	1	477	2	858
Routine allowance (Tj. PPh21)	1	213	2	311
Holiday Allowance	1	37	2	67
Performance Bonus	1	190	2	185
Total of Remuneration (a)	1	916	2	1,421
Post-Servise Insurance	1	210	2	245
Transportation Allowance	1	30	2	54
Total of Other Facilities (b)				
Total Received (a) + (b)	1	240	2	299

Mechanism for The Resignation and Dismissal of Sharia Supervisory Board (DPS) Members

The position in DPS shall be terminated if
1. A member's term of office has been over in accordance with the Company's Articles of Association.
2. A member resigns in compliance with the applicable provisions.
3. A member no longer satisfies the regulatory requirements.
4. A member passes away.
5. A member is dismissed based on the GMS decision.

The mechanism for DPS member resignation is as follows:

1. A DPS member reserves the right to resign from their position by submitting notification in writing about their intent to the Board of Directors before his/her resignation.
2. The Company must announce this information to the public and communicate this matter and propose the replacement candidate to OJK at least 2 (two) working days after receiving the resignation letter and nominate replacement candidates for DPS members.
3. If the number of DPS members is less than the minimum number as regulated in applicable legislation following this resignation, the Company must then appoint a new DPS member according to the relevant regulation.
4. A DPS member who resigns before their term of office ends must be held responsible for their tasks during their active tenure, as reported in the incoming Annual GMS.
5. Any termination and/or resignation of DPS members must be reported to OJK within 10 (ten) calendar days after the effective date of a termination and/or resignation.

Director of Sharia Business unit (UUS) of the Company

Director of Sharia Business unit (UUS) of the Company The Company's Sharia Business Unit (UUS) is led by the Director of Sharia Banking who is fully responsible for the implementation of sharia business management prudentially in accordance with the sharia principles. The appointment of the Director is based on integrity, competence, adequate financial reputation, experience as a bank executive officer in bank's operations, and passing the fit and proper test as required in Bank Indonesia Regulation No. 14/6/PBI/2012 on fit and proper test in Sharia Banks and Sharia Business Units.

Currently, the Director of UUS Perusahaan is held by Mr. Hirwandi Gafar who was appointed based on the Board of Directors meeting on December 3, 2019 and has obtained OJK approval through Letter number SR-6/PB.1/2021 dated March 2, 2021, through Confirmation of the Appointment of the UUS Director of PT Bank Tabungan Negara (Persero) Tbk. His brief profile is available in the Company Profile Chapter in the Board of Directors Profile section of this Annual Report.

Duties and Responsibilities of The UUS Director

The Director of UUS manages UUS prudentially in accordance with the sharia principles by following the Company's Article of Association and GCG best practices.

Head of Sharia Business Division

In performing the operational activity, the Director of UUS is assisted by the Head of the Sharia Business Division. Based on the Company's Guidebook, below are the duties and authorities of the Head of the Sharia Business Division:

1. Establishing a proposal of the work plan and budget (RKAP) on the corresponding field according to the applicable terms.
2. Developing a strategic plan for the UUS.
3. Formulating policies relating to the UUS.
4. Ensuring the secretarial function of DPS.
5. Ensuring the operation and performance of the UUS.
6. Managing and controlling any risks existing within their professional context.
7. Applying GCG in the respective unit.

Report on the Implementation of the Company's UUS Activities

Transparency of Financial and Non-Financial Conditions, GCG Implementation Reports and Internal Reporting

Throughout 2024, the Bank has published quarterly financial reports both through the website www.btn.co.id and through newspapers, and reported them to regulators in accordance with regulations and on time. A recapitulation of the publication of quarterly financial reports through newspapers and online media is as follows:

Quarterly	Newspaper	Date
IV-2023	Kontan Bisnis Indonesia www.btn.co.id	February 12, 2024
I-2024	Bisnis Indonesia www.btn.co.id	April 26, 2024
II-2024	Bisnis Indonesia	July 26, 2024
III-2024	www.btn.co.id	November 29, 2024

List of Consultants, Advisors or the equivalent used by UUS Bank BTN

Based on the Cooperation Agreement document between UUS BTN and consultants related to activities and operational activities at UUS BTN, throughout 2024 UUS BTN has collaborated with several consultants, namely:

1. Hajj Financial Management Agency (BPKH) for Increasing Regular Hajj Registration Through Optimization of Hajj and Umrah Guidance Groups (KBIHU) and Hajj Communities.
2. PT Infinetworks Global for providing SMS Gateway services.
3. PT Rintis Sejahtera for providing implementation services for the National Quick Response Code Standard (QRIS) Including QR Cross Border and Transfer Transactions, Cash Withdrawals and Cash Deposits (TUNTAS).

Number of Deviations (Internal Fraud) that Occurred and Settlement Efforts by UU

In order to reduce internal irregularities (internal fraud) committed by management, permanent and non-permanent employees (honorary and outsourced) related to the work processes and operational activities of UUS Bank BTN which significantly affect the performance conditions of UUS Bank BTN, UUS Bank BTN carries out various preventive measures against the possibility of internal fraud committed by employees.

During 2024, irregularities/fraud related to UUS work processes and operational activities can be explained in the following table:

Internal Fraud in 1 year	Number of frauds committed (Internal)					
	Member of the Board of Commissioners and Member of the Board of Directors		Permanent Employee		Non-Permanent Employee	
	Previous year (2023)	Current year (2024)	Previous year (2023)	Current year (2024)	Previous year (2023)	Current year (2024)
Total Fraud	-	-	1	4	-	-
It has been resolved	-	-	1	4	-	-
In the process of being resolved internally at UUS	-	-	-	0	-	-
No solution has been attempted yet	-	-	-	0	-	-
It has been followed up through the legal process	-	-	-	0	-	-

Note:

1. The number of cases in the current year is based on the Special Audit Result Report for the period January to December 2024.
2. The number of cases that have been **"Resolved"** are cases that have received a sanction decision from the Board of Directors until December 2024.
3. The number of cases that are **"In the process of being resolved internally at the bank"** are cases that have not received a sanction decision from the Board of Directors until December 2024.
4. The number of cases that **"Have been followed up through the legal process"** are cases that have had a Board of Directors Decision in the form of criminal sanctions (criminal reporting process by the Legal Division (LGD).

Number of Legal Problems and Settlement Efforts by UUS

Throughout 2024, civil and criminal legal issues faced by UUS Bank BTN and which have been submitted through the legal process, are as follows:

Legal Issues	Amount	
	Civil	Criminal
It has been completed (has permanent legal force).	7	1
In the process of being resolved.	13	2
Total	20	3

In resolving legal problems faced by UUS of Bank BTN, deliberation is always prioritized when facing disputes with customers. However, if deliberation cannot resolve the dispute, then UUS Bank and the customer agree to resolve the dispute using arbitration or through a judicial institution based on applicable laws and regulations and in accordance with Sharia Principles.

Non-Halal Income and Its use

Non-halal income obtained includes, among other things, fines or interest income from placements with Bank BTN (Parent) which are used as liquidity funds for Sharia Branch Offices. The total income earned during 2024 (in full Rupiah figures) is as follows:

No.	Description		December 31, 2024
1.	Sources of Benevolent Funds at the Beginning of the Period		467,385,659
2.	Receipt of Benevolent Funds		
	A	Infaq	-
	B	Alms	-
	C	Productive benevolence refunds	-
	D	Fine	1,063,000,094
	E	Non-halal acceptance	3,013,499
	Total Receipts		**1,066,013,593**
3.	Use of Benevolent Funds		
	A	Productive Benevolent Fund	-
	B	Donations	-
	C	Other uses are for the public interest	446.449.151
	Total Usage		**446.449.151**
4	Increase (Decrease) in Sources of Benevolent Funds for Use		619.564.442
5	**Sources of Benevolent Funds at the End of the Period**		**1.086.950.101**

Conduct a UUS GCG Self Assessment

In order to create a healthy, prudent and resilient sharia banking industry, Bank BTN as an entity operating in the banking sector, through its Sharia Business Unit, is obliged to implement Good Corporate Governance and comply with Sharia Principles. Implementation of Good Corporate Governance (GCG) is an effort to protect stakeholder interests and increase compliance with laws and regulations and ethical values generally accepted in the sharia banking industry.

GCG implementation requires an assessment to see the extent of progress towards the GCG principles that have been implemented by the Company. This assessment is also useful for ensuring continuous improvement in the quality of GCG implementation in business processes. UUS Bank BTN has carried out a selfassessment in accordance with BI/OJK regulations which require the Bank to carry out its own assessment (internal self-assessment) on the implementation of GCG.

The results of the Bank BTN UUS self-assessment for the period January to December 2024 can be presented as follows:

No.	Factor	Weight (%)	Rating	Mark
1.	Implementation of the duties and responsibilities of the Director in charge of UUS	0.35	1.00	0.35
2.	Implementation of the duties and responsibilities of the Sharia Supervisory Board	0.20	1.00	0.20
3.	Implementation of Sharia Principles in fund-raising and fund-channeling activities and services.	0.10	2.00	0.20
4.	Distribution of funds to core financing customers and storage of funds by core depositors	0.10	2.00	0.20
5.	Transparency of Financial and Non-Financial Conditions, GCG Implementation Reports and Internal Reporting	0.25	2.00	0.50
Total Composite Value		**1.00**		**1.70**
Number Criteria		**2**		
Predicate		**GOOD**		

Based on the results of the Self Assessment that we have conducted, the composite value of the Sharia Business Unit of PT Bank Tabungan Negara (Persero) Tbk is **1.70** with a criterion of 2 and a predicate of **"Good"**, the composite value is the same as the composite value of the previous year. This reflects that the Bank's management has implemented

GCG which is generally quite good and consistent. This is reflected in the adequate fulfillment of GCG principles. If there are weaknesses in the implementation of GCG principles, then in general these weaknesses can be resolved well by the Bank's management.

Implementation of Compliance with Sharia Principles

Based on OJK Regulation Number 2 of 2024 dated February 15, 2024, concerning the Implementation of Sharia Governance for Sharia Commercial Banks and Sharia Business Units, the Company through the Board of Directors coordinates with the Sharia Supervisory Board regarding the implementation of the compliance function towards Sharia Principles. In 2024, coordination meetings between the Board of Directors and the Sharia Supervisory Board were held 3 (three) times to ensure that the implementation of the supervision function towards compliance with sharia principles in the BTN Sharia Business Unit (UUS) both at the Head Office and Branch Offices has been carried out properly by the Sharia Supervisory Board. Overall, the implementation of the supervisory duties of the Company's Sharia Supervisory Board regarding the new product development process and supervision of the Bank's activities has been reported through the Sharia Supervisory Board Supervision Report per 6 (six) months, ending in June and December.

Sharia Business Unit Risk Management Reporting

In the 2024 period, UUS has submitted a Quarterly Risk Profile Report to OJK in accordance with the provisions, namely as follows:

1. 71/S/DIR/ERMD/I/2024 Submission of Risk Profile Report of Bank BTN Sharia Business Unit for Quarter IV/2023.
2. 485/S/DIR/ERMD/IV/2024 Submission of Risk Profile Report of Bank BTN Sharia Business Unit for Quarter I/2024.
3. 799/S/DIR/ERMD/VII/2024 Submission of Risk Profile Report of Bank BTN Sharia Business Unit for Quarter II/2024.
4. 1365/S/DIR/ERMD/X/2024 Submission of Risk Profile Report of Bank BTN Sharia Business Unit for Quarter III/2024.
5. 80/S/DIR/ERMD/I/2025 Submission of UUS Bank BTN Risk Profile Report for Quarter IV/2024.

In the Sharia Business Unit, reports for risk management are no different from conventional commercial banks, but 2 (two) types of risk are added, namely:

a. Return Risk Management
   Sharia Banking Division (SHAD) employees, including Bank business unit management, are part of implementing Risk Management for Return Risk, considering that Returns are the result of all Sharia Business Unit (UUS) business activities. The role of Business Unit Management, in this case the Treasury Department of the Sharia Business Unit (UUS), is to identify Return Risk on Risk resulting from changes in the rate of return paid by the Bank to customers, due to changes in the rate of return received by the Bank from the distribution of funds, which can influence behavior. Bank third party fund customers. Return Risk Measurement is based on assessment results using parameters/indicators, namely the composition of third party funds, the bank's strategy and performance in generating profits/revenue as well as the behavior of third party fund customers. These three indicators are used by the Treasury Department Sharia Business Unit (UUS) in managing Return Risk. In order to monitor Yield Risk and ensure that the returns given to customers are maintained, the Sharia Banking Division (SHAD), in this case the Treasury Department, manages policies related to special Financing Profit Sharing margins in coordination with business units, in this case the Commercial Financing Department and Branch Offices. Sharia.
b. Investment Risk Management
   Investment Risk is the risk resulting from the Bank sharing in the customer's business losses financed in profit sharing based financing, whether using the net revenue sharing method or using the profit and loss sharing method. Investment Risk Management is the management of financing risks provided on a Profit Sharing basis which is part of the Bank's Risk Management Policy Guidelines for Bank Sharia Business Units (UUS) and is prepared as part of the risk assessment process. Investment Risk Exposure is monitored from the Financing granting process until the Financing maturity. Investment Risk Measurement uses parameters/ indicators consisting of the composition and level of concentration of profit-sharing based financing, the quality of profit-sharing-based financing and external factors. These three indicators are used by the Commercial Financing Department in the Sharia Business Unit (UUS) in managing Investment Risk. Monitoring and controlling investment risk includes evaluating profit sharingbased financing risk exposure against investment risk limits and reviewing Internal Credit Rating policies between the Commercial Financing Department in the Sharia Business Unit (UUS) together with the Wholesale Credit Risk Division (WRD). Management of profit sharing based financing is carried out by the Commercial Financing Department at the Sharia Business Unit (UUS) and Sharia Branch Offices.

Public Company Governance Implementation Guidelines

The Company always complies with applicable regulations in implementing GCG. It includes referring to the Public Company Governance Guidelines stipulated in OJK Regulation No. 21/POJK.04/2015 and OJK Circular Letter No. 32/SEOJK.04/2015 concerning Public Company Governance Guidelines. The POJK regulates 5 (five) aspects, 8 (eight) principles, and 25 (twenty-five) recommendations for the implementation of aspects and principles of good corporate governance. Until the end of 2024, the Company has implemented all recommendations in the regulation with the following detailed information:

No	Aspects; Principles; Recommendations			Comply or Explain
A.	Aspek 1 : Hubungan Perusahaan Terbuka Dengan Pemegang Saham Dalam Menjamin Hak-Hak Pemegang Saham.			
	A.1.	Aspect 1: Relationship of Public Company with Shareholders in Guaranteeing the Rights of Shareholders		
		A.1.1.	Recommendation 1 : Public Company has technical ways or procedures for voting both in an open and closed manner that prioritize independence and the interests of shareholders. Explanation : Each share with issued voting rights has one voting right (one share, one vote). Shareholders can exercise their voting rights during decision-making, especially in making decisions through voting. However, the mechanism for decision-making through voting, both in an open and closed manner, has not been regulated in detail. Public Companies are recommended to have a voting procedure in making decisions on an agenda of the GMS. The voting procedure must maintain the independence or freedom of shareholders. For ex-ample, voting is held openly by raising hands following the instructions offered by the chairman of the GMS. Meanwhile, voting in a closed manner is carried out on decisions that require confidentiality or at the request of shareholders by using ballots or electronic voting..	a. The voting procedure in making decisions on a GMS agenda item is carried out by closed voting as stated in the GMS Rules of Procedure which are disclosed to the public via the Company's website. b. The voting procedure has maintained the independence and freedom of shareholders. In 2024, the Company held an Annual GMS on March 6, 2024. All decisions were taken based on deliberation to reach consensus. In the event that a decision based on deliberation to reach consensus is not reached, a vote is taken. Decisions are taken if approved by more than ½ (one half) of the total number of shares with valid voting rights present at the meeting. Voting is carried out using the following mechanism: a. Shareholders or their proxies who abstain or disagree will be asked to raise their hands and submit their voting cards to the officer. The Meeting Officer will collect voting cards from shareholders or their proxies and then submit the voting cards to the Notary to be counted. c. The number of abstentions and dissenting votes is calculated with the valid votes cast at the Meeting and the difference is the number of affirmative votes. d. Shareholders with valid voting rights who do not cast a vote (abstain) are deemed to have cast the same vote as the majority of shareholders who cast a vote. e. The notary will calculate and convey the results of the voting on the proposed Meeting decisions submitted. **Comply**
		A.1.2.	Recommendation 2 : All members of the Board of Directors and the Board of Commissioners of Public Company participate in the Annual GMS. Explanation : The presence of all members of the Board of Directors and members of the Board of Commissioners of Public Company has an aim. It is to ensure that every member of the Board of Directors and members of the Board of Commissioners can pay attention, explain, and directly answer the problems that occur or the questions asked by shareholders related to the agenda in the GMS.	In organizing the GMS, the Company always complies with all applicable provisions. During the implementation period of the Annual GMS on March 6, 2024, all members of the Board of Directors and Board of Commissioners including members of the Audit Committee may attend the Annual GMS. **Comply**

No	Aspects; Principles; Recommendations			Comply or Explain
		A.1.3.	Recommendation 3 : A summary of GMS minutes is available on the Website of the Public Company for at least one (1) year. Explanation : Based on the provisions in Article 34 paragraph (2) of the Financial Services Authority Regulation Num-ber 32/POJK.04/2014 concerning the Plan and Implementation of the General Meeting of Shareholders of Public Companies, Public Companies are required to make a summary of GMS minutes in Indonesian and foreign languages (at least in English), and announced 2 (two) working days after the GMS is held to the public, one of which is through the Public Company Website. The availability of a summary of GMS minutes on the Public Company Website provides an opportunity for shareholders who are absent to easily and quickly obtain important information about the GMS implementation. Therefore, the provision on the minimum period of availability of a summary of GMS minutes on the Website is intended to provide sufficient time for shareholders to obtain such information.	The Company provides a summary of the minutes of the GMS in Indonesian and English through the Company's website www.btn.co.id in the Investor Relations menu, as well as in print media and through the IDXnet and OJK E-reporting electronic reporting systems, namely on March 7, 2024 for the 2023 Annual GMS. **Comply**
	A.2.	**Principle 2: Improving the Quality of Public Company Communication with Shareholders or Investors.**		
		A.2.1.	Recommendation 4 : Public Company possesses a communication policy with Shareholders or Investors. Explanation : The existence of communication between the Public Company and shareholders or investors is intended for the shareholders or investors to get a clearer understanding of the information that has been published to the public, such as periodic reports, the disclosure of information, business conditions or prospects and performance, as well as the implementation of public company governance. In addition, shareholders or investors can also submit suggestions and opinions to the management of the Public Company. The communication policy with shareholders or investors shows the Public Company's commitment to communicating with shareholders or investors. The policy may include strategies, programs, and communication execution timing, as well as guidance that supports shareholders or investors to participate in such communications.	The Company has a communication policy with shareholders or investors referring to the Investor Relations Policy which includes analyst meetings, public exposes, investor meetings, Annual Reports and so on. Technical Instruction Number PT.9-AD.9 concerning Bank Communication Management of PT Bank Tabungan (Persero) Tbk **Comply**
		A.2.2.	Recommendation 5 : The Public Company discloses the communication policy of the Public Company with Sharehold-ers or Investors on the Company Website. Explanation : Disclosure of communication policy is a form of transparency on the commitment of the Public Company to providing equality to all shareholders or investors regarding the implementation of communication. The disclosure of information also aims to increase the participation and role of shareholders or inves-tors in implementing the Public Company communication program.	The Company has disclosed its communication policy with shareholders or investors on the Company's website (www.btn.co.id) Investor Relations menu - Investor Relations Policy Guidelines. **Comply**

No	Aspects; Principles; Recommendations			Comply or Explain
B.	Aspect 2: Board of Commissioners' Function and Role			
	B.1.	Principle 3: Strengthening membership and composition of the Board of Commissioners		
		B.1.1.	Recommendation 6 : Determination of the number of members of the Board of Commissioners by considering the Public Company's condition. Explanation : The number of members of the Board of Commissioners may affect the effectiveness of the Board of Commissioners' duties. The number of the Board of Commissioners members in a Public Company must be determined by referring to the provisions of the applicable laws and regulations. The Board of Commissioners members consist of at least two people based on the requirements of the Financial Services Authority (FSA) Regulation Number 33/POJK.04/2014 concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies. In addition, it is also necessary to consider the condition of the Public Company. It includes characteristics, capacity, and size, as well as achieving goals and fulfilling different business needs among Public Companies. However, if the number of the Board of Commissioners members is too large, it could interfere with the effectiveness of the implementation of the functions of the Board of Commissioners.	The determination of the number of members of the Board of Commissioners has considered the Company's conditions including characteristics, capacity, and size, as well as the achievement of objectives and fulfillment of the bank's business needs referring to the provisions of the Regulator. The number of members of the Board of Commissioners is currently considered sufficient and in accordance with OJK Regulation Number 33/POJK.04/2014 concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies or equal to the number of members of the Board of Directors. **Comply**
		B.1.2.	Recommendation 7 : Determination of the composition of members of the Board of Commissioners considering the diversity of expertise, knowledge, and experience required. Explanation : The composition of the Board of Commissioners is a combination of characteristics both in terms of the organs of the Board of Commissioners and members of the Board of Commissioners individually, following the needs of the Public Company. These characteristics can be reflected in the determination of the expertise, knowledge, and experience needed in implementing supervisory duties and providing advice by the Board of Commissioners of a Public Company. The composition that considers the needs of the Public Company is a positive matter, primarily related to decision-making in the context of implementing the supervisory function carried out by considering various broader aspects.	The composition of the members of the Board of Commissioners takes into account the diversity of expertise, knowledge and experience required as disclosed in the Diversity of the Composition of the Board of Commissioners section of this Annual Report. **Comply**

No	Aspects; Principles; Recommendations			Comply or Explain
	B.2.	**Principle 4: Improving the Implementation Quality of Duties and Responsibilities of the Board of Commissioners.**		
		B.2.1.	Recommendation 8 : The Board of Commissioners has in place a Self- Assessment policy that assesses the perfor-mance of the Board of Commissioners. Explanation : The Board of Commissioners' self-assessment policy is a guideline used as a form of accountability for collegial assessment of the Board of Commissioners' performance. Selfassessment is intended to be carried out by each member to assess the implementation of the Board of Commissioners' performance in a collegial manner. Self-assessment is not used to evaluate the individual performance of each mem-ber of the Board of Commissioners. With this self-assessment, each member of the Board of Commis-sioners is expected to improve the performance of the Board of Commissioners on an ongoing basis. The policy can include assessment activities carried out along with their purposes and objectives, the periodic implementation time, and the benchmarks or assessment criteria used following the recom-mendations given by the nomination and remuneration function of a Public Company. The existence of this function has been required in the Financial Services Authority Regulation Number 34/ POJK.04/2014 concerning the Nomination and Remuneration Committee of Issuers or Public Companies.	The Board of Commissioners has a self-assessment policy as stated in the Joint Decree on the Working Relations of the Board of Commissioners and the Board of Directors of the Company in the Joint Decree of the Board of Commissioners No. 01/SKB/KOM/BTN/2024 and the Board of Directors No. SKB-01/DIR-BTN/2024, Chapter V Performance Evaluation which is described in the Board of Commissioners' performance assessment section in this Annual Report and the Company's website (www.btn.co.id) Investor Relations menu - GCG - Crossreference ASEAN CG Scorecard - SKB. **Comply**
		B.2.2.	Recommendation 9 : Self-Assessment policies assessing the performance of the Board of Commissioners are to be disclosed through the Annual Report of the Public Company. Explanation : The disclosure of the self-assessment policy on the performance of the Board of Commissioners is carried out not solely to fulfill the transparency aspect as a form of accountability for implementing the board's duties. In addition, it also provides assurance, especially to shareholders or investors, as at-tempts need to be made to improve the performance of the Board of Commissioners. With this disclo-sure, shareholders or investors know the check and balance mechanism for the performance of the Board of Commissioners.	The self-assessment policy for assessing the performance of the Board of Commissioners is disclosed in the Board of Commissioners performance assessment section of this Annual Report. **Comply**

No	Aspects; Principles; Recommendations		Comply or Explain
	B.2.3.	Recommendation 10 : The Board of Commissioners has a policy regarding the resignation of members of the Board of Commissioners if involved in financial crimes. Explanation : The policy regarding the resignation of members of the Board of Commissioners involved in financial crimes is a policy that can increase the trust of stakeholders in the Public Company, which will maintain the integrity of the Company. This policy is needed to help the legal process run smoothly so that the le-gal process does not interfere with the course of business activities. In addition, in terms of morality, this policy builds an ethical culture within the Public Company. The policy may be included in the Guidelines or Code of Ethics applicable to the Board of Commissioners. Furthermore, the status of a convict is given by the competent authority to a member of the Board of Commissioners who is involved in financial crimes. Financial crimes refer to manipulation and various forms of embezzlement in financial services activities and Money Laundering Crimes as referred to in Law Number 8 of 2010 concerning the Prevention and Eradication of Money Laundering Crimes.	The Company has a policy in the Guidelines and Work Procedures of the Board of Commissioners in the Decree of the Board of Commissioners Number 18/KOM/BTN/2024 regarding the resignation and dismissal of members of the Board of Commissioners if they are involved in actions that are detrimental to the Company and/or the State and if the person concerned is found guilty by a court decision that has permanent legal force. **Comply**
	B.2.4.	Recommendation 11 : The Board of Commissioners or the Committee that performs the Nomination and Remuneration function composed a Nomination succession policy for members of the Board of Directors. Explanation : Based on the provisions of the Financial Services Authority Regulation Number 34/ POJK.04/2014 con-cerning the Nomination and Remuneration Committee of Issuers or Public Companies, the committee that carries out the nomination function has the task of formulating the policies and criteria needed in the nomination process for prospective members of the Board of Directors. One of the policies that can support the Nomination process, as referred to, is the succession policy of members of the Board of Di-rectors. The policy on succession aims to maintain the continuity of the process of regeneration or re-generation of leadership in the Company to maintain business sustainability and the Company's long-term goals.	The appointment and dismissal of the Company's Board of Directors are carried out based on the principles of professionalism and GCG. The Company is a State-Owned Enterprise (BUMN), therefore the Board of Directors succession policy refers to the Regulation of the Minister of State-Owned Enterprises No. PER-11/MBU/07/2021 concerning Requirements, Procedures for Appointment and Dismissal of Members of the Board of Directors of State-Owned Enterprises. In addition, as a public company, the Company's policy also refers to the Financial Services Authority Regulation Number 33/POJK.04/2014 concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies. A description of the succession policy in the Nomination process for members of the Company's Board of Directors has been disclosed in the Board of Directors Succession Policy section of this Annual Report. **Comply**

No	Aspects; Principles; Recommendations			Comply or Explain
C.	Aspect 3: Functions and Roles of the Board of Directors			
	C.1.	Principle 5: Strengthening the Membership and Composition of the Board of Directors.		
		C.1.1.	Recommendation 12 : Determination of the number of members of the Board of Directors considers the Public Company's condition and effectiveness in decision making. Explanation : As an authorized corporate organ that deals with the management of the Company, the determination of the number of Directors dramatically affects the performance of the Public Company. Thus, the number of members of the Board of Directors must be determined through careful consideration and refer to the applicable laws and regulations. It must be based on the Financial Services Authority Regulation Number 33 / POJK.04 / 2014 concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies consisting of at least 2 (two) people. In addition, the number of Directors must be determined based on the need to achieve the goals and objectives of the Public Company and adjusted to the conditions of the Public Company. This condition includes the characteristics, capacity, and size of the Public Company and how to achieve the effectiveness of the Board of Directors' decision making.	The determination of the number of members of the Board of Directors has considered the Company's conditions including characteristics, capacity, and size, as well as the achievement of objectives and fulfillment of the bank's business needs referring to the provisions of the Regulator. The number of members of the Board of Directors has complied with the provisions of OJK Regulation No. 33/POJK.04/2014 concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies. **Comply**
		C.1.2.	Recommendation 13: Determination of the composition of members of the Board of Directors considers the diversity of expertise, knowledge, and experience needed. Explanation : Similar to the Board of Commissioners, the diversity of the composition of members of the Board of Directors is a combination of desired characteristics. This combination is in terms of the organs of the Board of Directors and the individual members of the Board of Directors, following the needs of the Public Company. It is determined by considering the appropriate expertise, knowledge, and experience in the division of duties and functions of the Board of Directors in achieving the objectives of the Public Company. Thus, consideration of the characteristic combination will impact the accuracy of the nomination process and the individual appointment of members of the Board of Directors or collegial Board of Directors.	The composition of the Board of Directors members takes into account the diversity of skills, knowledge and experience required as disclosed in the Diversity of the Composition of the Board of Directors section of this Annual Report. **Comply**

No	Aspects; Principles; Recommendations		Comply or Explain
	C.1.3.	Recommendation 14 : Members of the Board of Directors in charge of Accounting or Finance have the required expertise and/or knowledge in accounting. Explanation : Financial Statements are management's accountability reports from managing resources owned by a Public Company. They must be prepared and presented following generally accepted Financial Accounting Standards in Indonesia and related FSA regulations, including laws and regulations in the Capital Market sector that regulate the presentation and disclosure of Public Company Financial Statements. Based on the laws and regulations in the Capital Market sector that regulate the responsibility of the Board of Directors for the Financial Statements, the Board of Directors is jointly responsible for the Financial Statements. The President Director and members of the Board of Directors in charge of accounting or finance sign the Financial Statements. Thus, the disclosure and preparation of financial information presented in the financial statements will largely depend on the expertise and/or knowledge of the Board of Directors, especially members of the Board of Directors in charge of accounting or finance. The existence of expertise and/or knowledge qualifications in the accounting field that at least the members of the Board of Directors have can ensure the process of making the Financial Statements. Thus, the Financial Statements can be a reliable basis for stakeholders in making economic decisions related to the Public Company. Such expertise and/or knowledge can be proven by educational background, training certification, and/or related work experience..	In the 2024 period, the Director in charge of accounting or finance has an educational background and work experience in finance with the following information: a. Education 1. Bachelor of Economics 2. Master of Economics 3. Have work experience in banking b. Working experience 1. March 2021 – currently serving as Director of Finance 2. 2015-2021 served as Head of Treasury Division. 3. 2015 served as Acting Regional Head, Regional Office I 4. 2014 served as Head of Treasury Division. 5. 2013 served as Head of Institutional Banking Division. 6. 2012 served as Post Office Alliance Desk Head The certifications held by the Director in charge of finance/accounting can be seen in the Board of Directors Competency Development section of this Annual Report. **Comply**
	C.2.	**Principle 6: Improving the Quality of the Board of Directors' Duties and Responsibilities.**	
	C.2.1.	Recommendation 15 : The Board of Directors has in place a Self-Assessment policy used to assess the performance of the Board of Directors. Explanation : Similar to the Board of Commissioners, the Board of Directors self-assessment policy is a guideline used as a form of accountability for collegial assessment of the Board of Directors' performance. Self-assessment is intended to be carried out by each member of the Board of Directors. The aim is to assess the implementation of the Board of Directors' performance in a collegial manner. Self-Assessment is not used to evaluate the individual performance of each member of the Board of Directors. With this self-assessment, each member of the Board of Directors is expected to improve the performance of the Board of Directors on an ongoing basis. The policy may include assessment activities carried out along with their purposes and objectives, the periodic implementation time, and the benchmarks or assessment criteria used following the recommendations given by the nomination and remuneration function of a Public Company. The establishment of these functions has been required in the Financial Services Authority Regulation Number 34/POJK.04/2014 concerning the Nomination and Remuneration Committee of Issuers or Public Companies.	The Board of Directors has its own self-assessment policy as stated in the Joint Decree on the Working Relations of the Board of Commissioners and the Board of Directors of the Company in 2024, Chapter IV Performance Evaluation, and this assessment system is summarized as a Key Performance Indicator (KPI) as described in the Board of Directors' performance assessment section of this Annual Report and the Company's website (www.btn.co.id) Investor Relations-GCG menu - Crossreference ASEAN CG Scorecard. **Comply**

No	Aspects; Principles; Recommendations			Comply or Explain
		C.2.2.	Recommendation 16 : Self-Assessment policies in order to assess the performance of the Board of Directors are disclosed through the Annual Report of the Public Company. Explanation : The disclosure of the self-assessment policy regarding the Board of Directors' performance is carried out not solely to fulfill the transparency aspect as a form of accountability for implementing the Board of Directors' duties. In addition, it also provides essential information regarding the attempts to improve the management of the Public Company. This information is beneficial to give assurance to shareholders or investors regarding the existence of certainty that the Company management continues to be carried out in a better direction. With this disclosure, shareholders or investors know the check and balance mechanism for the performance of the Board of Directors.	The self-assessment policy for assessing the performance of the Board of Directors is disclosed in the Board of Directors' performance assessment section of this Annual Report. **Comply**
		C.2.3.	Recommendation 17: The Board of Directors has a policy related to the resignation of members of the Board of Directors when involved in financial crimes. Explanation : The policy of resignation for members of the Board of Directors involved in financial crimes is a policy that can increase the stakeholders' trust in the Public Company, which in return will maintain the Company's integrity. This policy is needed to help the legal process runs smoothly and so that the legal process does not interfere with the course of business activities. In addition, in terms of morality, this policy will build an ethical culture within the Public Company. The policy may be covered by the Guidelines or Code of Ethics applicable to the Board of Directors. Furthermore, the status of a convict is given by the competent authority to a member of the Board of Commissioners who is involved in financial crimes. Financial crimes refer to manipulation and various forms of embezzlement in financial services activities and Money Laundering Crimes as referred to in Law Number 8 of 2010 concerning the Prevention and Eradication of Money Laundering Crimes.	The Company has a policy on the Guidelines and Work Procedures of the Board of Directors through Special Policy Number KK.6-G concerning the Guidelines and Work Procedures of the Board of Directors. related to the resignation and dismissal of members of the Board of Directors if they are involved in actions that are detrimental to the Company and/or the State and if the person concerned is found guilty by a court decision that has permanent legal force. **Comply**
D.	**Aspect 4: Stakeholder Participation**			
	D.1.	**Principle 7: Upgrading corporate governance aspects through stakeholder participation.**		
		D.1.1.	Recommendation 18 : The Public Company has in place policies to prevent Insider Trading. Explanation : A person with insider information is prohibited from conducting a Securities transaction using insider information as referred to in the Law on Capital Market. Public Companies can minimize the occurrence of insider trading through prevention policies, for example, by strictly separating confidential data and/or information from public ones and dividing the duties and responsibilities for the management of such information proportionally and efficiently.	The Company has a policy to prevent insider trading as regulated in Special Policy Number KK.9-AA concerning Investor Relations Activities as can be seen on the Company's website (www.btn.co.id) Investor Relations menu - Investor Relations Policy Guidelines. **Comply**

No	Aspects; Principles; Recommendations		Comply or Explain
	D.1.2.	Recommendation 19 : The Public Company has in place an Anti- Corruption and Anti-Fraud policy. Explanation : Anti-corruption policies are useful for ensuring that the business activities of public companies are carried out legally, prudently, and in accordance with the principles of good governance. The policy can be part of a code of conduct or in its own form. The policy may include, among others, programs and procedures carried out to overcome corrupt practices, kickbacks, fraud, bribery, and/ or gratification in a Public Company. The scope of the policy must describe the prevention of the Public Company against all corrupt practices, either giving or receiving from other parties.	Special Policy No. KK.8-K regarding Fraud Risk management procedures. As a guideline in the implementation of Gratification Control as an initiative of the national anti-corruption program, the Company issued instructions for implementing gratification control guidelines in a Special Policy Number KK.6-A concerning Gratification Control Procedures. **Comply**
	D.1.3.	Recommendation 20: The Public Company has a policy in place regarding the selection and improvement of suppliers or vendor ability. Explanation : The supplier or vendor selection policy is useful to ensure that the Public Company obtains the necessary goods or services at competitive prices and good quality. Meanwhile, the policy of increasing the ability of suppliers or vendors helps ensure that the supply chain runs efficiently and effectively. The suppliers' or vendors' ability to supply/ provide the goods or services needed by the Company will affect the quality of the Company's output. Thus, implementing these policies can guarantee the continuity of supply, both in terms of quantity and quality needed by the Public Company. The scope of this policy includes criteria in selecting suppliers or vendors, transparent procurement mechanisms, attempts to improve the capabilities of suppliers or vendors, and the fulfillment of rights related to suppliers or vendors. The Company has policies related to the procurement of goods and services that contain the selection and improvement of supplier or vendor capabilities as stated in the Procurement Guidelines standards.	The Company has policies related to vendor management as regulated in Special Policy concerning Guidelines for the Implementation of Procurement of Goods and/or Services and Technical Instructions Number PT.9-H.1 concerning Guidelines for the Implementation of Procurement of Goods and/or Services. In general, the scope of this policy includes, among others, criteria for vendor selection, transparent procurement mechanisms, vendor performance evaluation, and vendor track records. Improving supplier or vendor capabilities is done by providing guidance to vendors through coordination meetings, monitoring and evaluating vendor performance. The implementation of the vendor selection policy is carried out by managing the Bank Partner List which can be used as a vendor database in procurement using the direct appointment/direct selection/direct selection method. The Special Policy above also regulates the Standard Operating Procedure (SOP) for transparent procurement mechanisms through the auction/direct selection/direct selection/direct appointment method as well as provisions regarding work contracts with vendors. So that with the implementation of this policy, it is expected that the continuity of supply needed by the company can be guaranteed. **Comply**
	D.1.4.	Recommendation 21 : The Public Company has a policy on fulfilling the creditors' rights. Explanation : The policy regarding the fulfillment of creditors' rights is utilized as a guideline in making loans to creditors. The policy aims to maintain the fulfillment of rights and maintain creditors' trust in the Public Company. The policy includes considerations in making agreements, as well as follow-up actions in fulfilling the obligations of the Public Company to creditors.	The policy on the fulfillment of creditor rights is used as a guideline in making loans to creditors. The purpose of the policy is to ensure the fulfillment of rights and maintain creditor trust in the Public Company. The policy includes considerations in making agreements, as well as follow-up in fulfilling the obligations of the Public Company to creditors. Basic creditor rights policies include: a. Receive principal repayment and interest payment at the agreed time. b. Obtain the right to a fine for late payment of principal and interest payment. c. Request explanation, information, and documents and examine the Company's books. For 2024, **there are 2 creditors of the Company, namely: Bilateral Loan Creditors and Bond Creditors**. **Comply**

No	Aspects; Principles; Recommendations		Comply or Explain
	D.1.5.	Recommendation 22 : Public Company has a whistleblowing system policy. Explanation : A well-prepared whistleblowing system policy will provide certainty of protection to witnesses or whistleblowers for an indication of violations committed by employees or management of the Public Company. The implementation of these system policies will have an impact on the formation of good corporate governance culture. The whistleblowing system policy includes, among others, the types of violations that can be reported through the whistleblowing system, the way of complaints, protection, and guarantees of the confidentiality of the whistleblower, the handling of complaints, the party who manages the complaint, and the results of handling and following up complaints.	The Company has a Whistleblowing System implementation policy regulated in Technical Instruction Number PT.7-B.2 concerning the Management of the BTN Whistleblowing System which includes the types of violations that can be reported through the whistleblowing system, how to report, protection and guarantee of confidentiality of the reporter, handling of complaints, parties managing complaints, and the results of handling and follow-up of complaints in accordance with OJK provisions. Disclosure of the Whistleblowing System policy in question for the 2023 period is described in the Whistleblowing System section of this Annual Report. **Comply**
	D.1.6.	Recommendation 23 : Public Company has a policy of providing long-term incentives to the Board of Directors and employees. Explanation : Long-term incentives are incentives based on the achievement of long-term performance. The longterm incentive plan assumes that the Company's longterm performance is reflected by the growth in value of the stock or other Company's long-term targets. Long-term incentives are useful to maintain loyalty and provide motivation to the Board of Directors and employees to increase their performance or productivity, which will have an impact on improving the Company's performance in the long run. The existence of a long-term incentive policy is a real commitment of the Public Company to encourage the implementation of long-term incentives to the Board of Directors and Employees with conditions, procedures, and forms adjusted to the long-term goals of the Public Company. The policy may include, among others, the purpose and objectives of providing long-term incentives, terms and procedures for providing incentives, and conditions and risks that the Public Company must consider in providing incentives. The policy can also be included in the remuneration policy of the existing Public Company.	Commissioners have been regulated, including: a. Special Policy No. KK.3-D concerning Income of Directors, Board of Commissioners, Senior Executive Vice President (SEVP) and Supporting Organs of the Board of Commissioners b. Special Policy Number No.KK.3-B concerning Remuneration. The provision of remuneration and incentives has been disclosed in the Implementation of BTN Remuneration Governance section of this Annual Report. The provision of remuneration and incentives has been disclosed in the Implementation of BTN Remuneration Governance section of this Annual Report. The Board of Directors Regulation covers deferred variable-based remuneration as well as Material Risk Taker as stipulated in the Regulation of the Ministry of SOEs No. 04/MBU/2014 concerning Guidelines for Regulation of the Minister of SOEs Number Per-04/MBU/2014 as last amended by Regulation of the Minister of SOEs Number Per-13/MBU/09/2021 dated September 24, 2021 and OJK Regulation Number 45/POJK.03/2015. Since 2009, the Company has implemented long-term incentives in the form of MESOP for Directors and Employees as described in the Share Option section of this Annual Report. In 2024, the Company has implemented performance and risk-based remuneration. **Comply**

No	Aspects; Principles; Recommendations	Comply or Explain
E.	**Aspect 5: Disclosure of Information**	
	E.1. Principle 8: Improving the Implementation of the disclosure of information	
	E.1.1. Recommendation 24 : The Public Company utilizes information technology more broadly in addition to the Website as a medium for disclosing information. Explanation : The use of information technology can be a helpful medium for the disclosure of information. The disclosure of information is conducted not only to disclose information that has been regulated in laws and regulations but also to disclose other information related to Public Companies that are considered helpful for the knowledge of shareholders or investors. By using information technology more broadly apart from the Website, it is hoped that the Company can extend the effectiveness of disseminating company information. Nevertheless, the use of information technology is carried out while still considering the benefits and costs for the Company.	The Company continuously strives to improve the quality of information disclosure to stakeholders through the use of information technology, in addition to the Company's website, such as through social media, namely: • YouTube Bank BTN, • Facebook BTNcoid, • X @BankBTN, • Instagram @btn • LinkedIn PT Bank Tabungan Negara The Company also provides information updates to shareholders via email, conference calls and Capital Market TV IBCM Channel of the Indonesia Stock Exchange, in addition to site visit assistance by investors to BTN branch offices, Non-Deal Roadshows, one-on-one meetings, Analyst Meeting Public Expose. **Comply**
	E.1.2. Recommendation 25 : The Annual Report of the Public Company discloses the ultimate benefit of the Ownership of the Public Company of at least 5%, in addition to the disclosure of the ultimate beneficial owner of the share ownership of the Public Company through the main and controlling shareholders. Explanation : Laws and regulations in the Capital Market sector governing the submission of Public Company annual reports have regulated the obligation to disclose information regarding shareholders who own 5% (five percent) or more of Public Company shares. In addition, the obligation to disclose information regarding major and controlling shareholders of Public Companies, either directly or indirectly, is up to the last beneficial owner in the ownership of the shares. In this Governance Guidelines, it is recommended to disclose the ultimate beneficial owner of share ownership of a Public Company of at least 5% (five percent), in addition to disclosing the ultimate beneficial owner of share ownership by major and controlling shareholders.	The Company has disclosed information regarding shareholders who own 5% (five percent) or more of the Company's shares to the regulators, namely OJK and BEI. In this Annual Report, the matter in question has been disclosed in the Information to Investors section. **Comply**

Governance Principles for Banks Issued by Basel Committee on Banking Supervision

Governance Guidelines are best practice standards that can be used as a reference in implementing corporate governance, especially in the banking sector. They include 12 principles of corporate governance that can be summarized as follows.

Principle	Description	Implementation in BTN
Principle 1 Responsibilities of the Board of Commissioners	The Board of Commissioners has responsibilities that include: approval and oversight of the implementation of business strategy, structure and governance mechanisms, and corporate culture.	In the Company's Board of Commissioners' Rules of Procedure as stated in the Decree of the Board of Commissioners No. 18/KOM/BTN/2024 concerning the Guidelines and Work Procedures of the Board of Commissioners of PT Bank Tabungan Negara Tbk, it is stated that the responsibility of the Board of Commissioners is to provide opinions and suggestions on the Annual Work Plan and Budget and to provide suggestions on matters considered important by the Company, including corporate culture.
Principle 2 Qualifications and composition of the Board of Commissioners.	Members of the Board of Commissioners must have quality in their duties and responsibilities, both individually and collegially. They must understand their role in supervising and implementing corporate governance, and be able to carry out sound and objective decision-making.	The Company's Board of Commissioners does not have any financial relationship, management relationship, share ownership and/or family relationship with other members of the Board of Commissioners, the Board of Directors and/or Controlling Shareholders or relationship with the Bank, which may affect the ability of the person concerned to act independently as stipulated in the provisions of the Implementation of Good Corporate Governance for Commercial Banks and has signed an Independent Statement.
Principle 3 Structure and mechanism of the Board of Commissioners	The Board of Commissioners must establish appropriate governance structures and practices in carrying out their duties and periodically review their effectiveness.	The Board of Commissioners has Committees under the Board of Commissioners that assist in carrying out the duties of the Board of Commissioners, namely the Audit Committee, Risk Monitoring Committee and Remuneration and Nomination Committee.
Principle 4 Directors.	Under the direction and supervision of the Board of Commissioners, the Board of Directors can manage the Bank's activities by the business strategy, risk appetite, remuneration policies, and other policies that have been approved by the Board of Commissioners.	The Board of Directors manages the Company under the direction and supervision of the Board of Commissioners, as evidenced by the company's business achievements.
Principle 5 Business Group Governance Structure.	Within a business group, the Board of Commissioners of the parent company has overall responsibility for the business group and for ensuring the establishment and implementation of clean governance practices related to the structure, business, and risks of business groups and entities. The Board of Commissioners and Directors must understand the organizational structure of the business groups and the risks they face	The Company's Board of Directors and Board of Commissioners have knowledge and understanding of the company's core business and main risks, as evidenced by the passing of all Board of Commissioners and Board of Directors of the Fit and Proper Test. The Board of Directors and Board of Commissioners also continue to participate in training and development to improve their capabilities.
Principle 6 Risk Management Function	Banks must have a quality risk management function, be independent, have quality resources and have access to the Board of Commissioners.	The Company carries out the Risk Identification, Measurement, Monitoring, Risk Control Process, and Risk Management Information System through the Enterprise Risk Management and Digital Operation Risk Management frameworks. The Company continuously improves the capabilities and knowledge of all employees, especially in terms of risk management. The Company communicates risk management to the Board of Commissioners through the Risk Monitoring Committee.
Principle 7 Identification of Risk Monitoring and Control.	Risks in all kinds of bank activities must be identified, monitored, and controlled. The quality of the risk management and internal control infrastructure must be able to keep up with changes in the Bank's risk profile, external risk conditions, and industry practices	In the management of the Company's Risk Management, risk identification, measurement and assessment have been carried out by compiling a risk profile periodically. Risk measurement and assessment have been able to run well in accordance with the established Risk Management Policy which is adjusted to the level of risk faced by BTN.
Principle 8 Risk Communication.	Effective implementation of risk governance requires accurate risk communication within the Bank both between organizations and through reporting to the Board of Commissioners and Directors	The Risk Based Bank Rating (RBBR) assessment is submitted to the Risk Management Committee every semester. In addition, the results of the RBBR assessment are submitted to the Board of Commissioners through the Risk Monitoring Committee.

Principle	Description	Implementation in BTN
Prinsip 9 Obedience	The Board of Commissioners is responsible for overseeing management related to the Bank's compliance risk. The Board of Commissioners must establish a compliance function and provide approval for policies and processes for identifying, assessing, monitoring and reporting, and providing advice on compliance risks.	The Board of Commissioners ensures the implementation of good corporate governance in every business activity and corporate governance policy, including the implementation of compliance. Compliance risk assessments in RBBR are reported to the Board of Commissioners every 6 (six) months to obtain feedback.
Principle 10 Internal Auditing	The internal audit function must report independent assurance activities to the Board of Commissioners and must support the Board of Commissioners and Directors in encouraging the implementation of an effective governance process and the long-term health of the Bank.	Internal Audit is directly responsible to the President Director and communicates with the Board of Commissioners through the Audit Committee.
Principle 11 Compensation.	The Bank's remuneration structure must support the implementation of corporate governance and risk management	The Company's current remuneration policy is in accordance with OJK Regulation Number 45/ POJK.03/2015 concerning the Implementation of Governance in the Provision of Remuneration for Commercial Banks.
Principle 12 Disclosure and Transparency.	The implementation of governance by the Bank must be carried out transparently to shareholders, depositors, other relevant stakeholders, and market participants.	The Company makes disclosures through the BTN website www.btn.co.id and ensures the availability of the most updated information for stakeholders. In addition, BTN's information disclosure is carried out through the Annual Report, Sustainability Report and Public Expose.

Good Corporate Governance Assessment

The Company always attempts to apply the highest standard of corporate governance concerning international regulations and standards based on the principles of corporate governance developed by the Organization for Economic Cooperation and Development (OECD), the ASEAN Corporate Governance Scorecard (ACGS) issued by ASEAN Capital Market Forum (ACMF), Indonesian GCG Guidelines developed by the National Committee on Governance Policy (KNKG), Indonesian Banking GCG Guidelines developed by the KNKG and Principles for Enhancing Corporate Governance issued by the Basel Committee on Banking Supervision, where the company has conducted governance assessment as follows:

Self Assessment

Governance Self-Assessments are carried out periodically at the end of June and December each year. For 2024, the standards for implementing Governance, apart from referring to OJK Regulation Number 17 of 2023 concerning the Implementation of Governance for Commercial Banks, to follow the provisions of OJK Circular Letter Number 13/POJK.03/2017 concerning the Implementation of Governance for Commercial Banks.

Assessment Criteria

The indicators that become the standard for the implementation of the self-assessment include 11 (eleven) parameters. They are:

1. Implementation of the duties and responsibilities of the Board of Directors.
2. Implementation of duties and responsibilities of the Board of Commissioners.
3. Completeness and implementation of the duties of the Committee.
4. Conflict of interest handling.
5. Implementation of the compliance function.
6. Implementation of the internal audit function.
7. Implementation of the external audit function.
8. Implementation of risk management including the internal control system.
9. Provision of funds to related parties and large exposure.
10. Transparency of the Bank's financial and non-financial conditions, reports on the implementation of corporate governance, and internal reporting.
11. The Bank's strategic plan.

The Party Conducting The Assessment

The Company carries out a governance self-assessment by involving the entire Board of Commissioners, Directors, and work units related to the intended governance assessment factors.

Assessment Results

In the assessment of the Company's governance conducted in 2024, the results of the Self Assessment were as follows:

The results of the Corporate Governance self-assessment conducted in June 2024

Self Assessment Results of Governance Implementation		
	Rank	Rank Definition
Individual	2	Reflects that the Bank's management has implemented Governance that is generally **good**. This is reflected in the adequate fulfillment of Governance principles. In the event of weaknesses in the implementation of Governance principles, these weaknesses are generally less significant and can be resolved with normal actions by the Bank's management.

Result of Corporate Governance Self-Assessment in December 2024.

Self Assessment Results of Governance Implementation		
	Rank	Rank Definition
Individual	2	Reflects that the Bank's management has implemented Governance that is generally **good**. This is reflected in the adequate fulfillment of Governance principles. In the event of weaknesses in the implementation of Governance principles, these weaknesses are generally less significant and can be resolved with normal actions by the Bank's management.

From the results of the two assessments, the implementation of Corporate Governance in 2024 can be summarized as follows:

Bank's Name : PT BANK TABUNGAN NEGARA (PERSERO) Tbk
Position : JANUARY-DECEMBER 2024

Self Assessment Results of Governance Implementation		
	Rank	Rank Definition
Individual	2	Reflects that the Bank's management has implemented Governance that is generally **good**. This is reflected in the adequate fulfillment of Governance principles. In the event of weaknesses in the implementation of Governance principles, these weaknesses are generally less significant and can be resolved with normal actions by the Bank's management.

ANALYSIS
In general, the implementation of Corporate Governance is good. The Bank's management has implemented Governance principles and has prepared a Governance Structure that supports the implementation of governance, such as organizational structure, competent human capital, and policies as well as procedures that support the implementation of the Bank's activities. In addition, the Bank's management's efforts to make improvements have been carried out from time to time to ensure that the implementation of governance is in line with the Bank's business development. Improvements were made by taking into account input from the Board of Commissioners based on the results of monitoring/review/recommendations from the Committees that support the duties and responsibilities of the Board of Commissioners. During the reporting period, no violations of the precautionary principle were found in fulfilling CAR, Core Capital, NOP, and NPL and no exceedances and/or violations of LLL occurred. The Bank's commitments related to the audits by the Financial Services Authority (FSA) and the Audit Board of the Republic of Indonesia (BPK) have been followed up under agreed deadlines. **Objectives:** a. The assessment of governance structure aims to determine the adequacy of the Bank's Governance structure and infrastructure to ensure that the implementation of Good Governance produces an outcome that is in line with the expectations of the Bank's Stakeholders. The Governance Structure consists of the Board of Directors, Commissioners, Committees, and Work Units at the Bank. The Governance Infrastructure consists of bank policies and procedures, management information systems as well as main duties and functions of each organizational structure. b. The assessment of the governance process aims to determine the effectiveness of the implementation of governance principles supported by the adequacy of the Bank's governance structure and infrastructure, to produce outcomes that are in line with the expectations of all the stakeholders. c. The assessment of governance outcomes aims to determine the quality of outcomes that meet the expectations of all the stakeholders, which results from the implementation of good governance principles and is supported by the adequacy of the governance structure and infrastructure.

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Outcomes consist of qualitative and quantitative aspects as follows:
a. Adequacy of report transparency.
b. Compliance with laws and regulations.
c. Customer protection.
d. Objectivity in conducting assessments or audits.
e. Bank's performances, such as profitability, efficiency and capital and/or
f. Increase/decrease in compliance with applicable regulations, violations of LLL, and violations of provisions related to Bank reports to the Financial Services Authority (OJK).

Based on the Governance Self-Assessment Analysis consisting of Governance Structure, Governance Process, and Governance Outcome on each of the Governance assessment factors, it can be concluded that:

A. Governance Structure
The Governance Structure is generally **adequate**, as can be seen from the following summary:

1. Positive Factors
1.1 The General Meeting of Shareholders (GMS) held on March 6, 2024 granted full release and discharge (volledig acquit at de charge) to the Board of Directors for their management actions of the Company and the Board of Commissioners for their supervisory actions of the Company that have been carried out during the 2023 Financial Year.
1.2 Based on the General Meeting of Shareholders (GMS) for the 2023 financial year held on March 6, 2024, it was decided that the membership of the Board of Commissioners would consist of 9 (nine) people and the Board of Directors would consist of 11 (eleven) people.
1.3 As of December 31, 2024, all members of the Board of Commissioners and Directors have been declared to have passed the fit and proper test by the Financial Services Authority.
1.4 In carrying out its duties and responsibilities, the Board of Directors has integrity, competence and adequate knowledge.
1.5 All members of the Board of Directors do not hold concurrent positions as Commissioners, Directors or Executive Officers at other Banks, companies and/or institutions.
1.6 All members of the Board of Directors do not have family relationships up to the second degree with fellow members of the Board of Directors and/or members of the Board of Commissioners or the Bank's Controlling Shareholders.
1.7 The composition of the members of the Board of Commissioners as of December 31, 2024 is 9 (nine) members with 6 (six) of them as Independent Commissioners or 67% (sixty seven percent) of the total members of the Board of Commissioners, this is in accordance with the provisions.
1.8 All members of the Board of Commissioners do not hold concurrent positions as stipulated in the Regulations issued by the Regulator (OJK, BI, Ministerial Regulations and other statutory provisions).
1.9 All members of the Independent Board of Commissioners have no financial or management relationship with the Board of Directors and/or Controlling Shareholders.
1.10 BTN has an Audit Committee, Risk Monitoring Committee and Nomination & Remuneration Committee which are structures under the Board of Commissioners by taking into account the independence of membership in accordance with the provisions based on the latest decision of the Board of Commissioners on:
1.10.1 Decree of the Board of Commissioners Number 10/KOM/BTN/2024 dated October 16, 2024 concerning the Composition of Membership of the Risk Monitoring Committee of PT Bank Tabungan Negara (Persero) Tbk
1.10.2 Decree of the Board of Commissioners Number 11/KOM/BTN/2024 dated October 16, 2024 concerning the Composition of the Remuneration and Nomination Committee of PT Bank Tabungan Negara (Persero) Tbk
1.10.3 Decree of the Board of Commissioners Number 16/KOM/BTN/2024 dated November 19, 2024 concerning the Composition of the Audit Committee of PT Bank Tabungan Negara (Persero) Tbk
1.11 BTN Compliance Work Unit is an independent work unit or separate from the operational work unit (risk taking unit).
1.12 The Director in charge of the Compliance Function has met the independence requirements and does not hold concurrent positions as President Director/Deputy President Director, the Director in charge of business & operations, risk management, treasury, finance & accounting, logistics and procurement of goods/services, information technology, internal audit, and the Director in charge of the Compliance Function of BTN has been declared to have passed the fit and proper test from OJK.
1.13 BTN has an Internal Audit Work Unit called the Internal Audit Division (IAD) which is directly responsible to the President Director and can communicate directly with the Board of Commissioners or the Audit Committee.
1.14 The appointment of the Public Accounting Firm (KAP) for the 2024 financial report has been determined and meets the specified criteria.
1.15 BTN has a Risk Management Work Unit, namely the Enterprise & ESG Risk Management Division (ERMD).
1.16 The Bank has a complete funding provision policy, including monitoring tools and resolution steps and conducts periodic policy evaluations. Policy evaluations are carried out by related divisions involving and coordinating with other divisions, including the Compliance & Governance Division (CMGD), Enterprise & ESG Risk Management Division (ERMD), Digital & Operation Risk Management Division (DORD), and Legal Division (LGD) through the Policy and Procedure Division (PPD) which is then proposed to the Loan Policy Committee through the Board of Directors.
1.17 The Bank has policies and procedures regarding the procedures for implementing transparency of financial and non-financial conditions which consist of internal and external regulations (regulators).
1.18 The Bank's strategic plan has been formed into a Corporate Plan and a Business Plan in accordance with the Bank's vision and mission.
1.19 The Board of Directors has established the General Policy of the Board of Directors (KUD), namely "Becoming a Game Changer in the Disruptive Technology Era" and has prepared 10 (ten) strategies in 2024.

2. Negative Factors
There isn't any.

3. Identify Problems and Causes (Root Cause)
There isn't any.

4. Strength
4.1 The Board of Commissioners, Board of Directors, and the Board of Committees under the Bank's Board of Commissioners have fulfilled the Governance structure and infrastructure in accordance with regulatory provisions, including the appropriateness of the number, composition, concurrent positions, competence, reputation, integrity, independence.
4.2 The implementation of Bank Governance is supported by the structure of the Internal Audit Work Unit, Risk Management Work Unit, and Compliance Work Unit which are independent and professional.
4.3 The Bank has complete policies and procedures as guidelines in the implementation of Bank Governance, namely related to Handling Conflicts of Interest, Implementation of Compliance Function, Implementation of Internal Audit Function, Implementation of Risk Management, Internal System Control, Provision of Funds to Related Parties and Provision of Large Funds, Transparency of Financial & Non-Financial Conditions, and the Bank's Strategic Plan.

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B. Governance Process

The Governance process is generally adequate, as can be seen from the following summary:

1. Positive Factors

1.1 The Board of Directors has established strategic policies and decisions through effective and efficient Board of Directors Meetings which are communicated to all employees through various media such as the Digital Room for Elearning Modules (DREAMS), PPDigital and others.

1.2 The Board of Directors has conducted routine performance reviews with all Divisions & Regional Offices, and the Board of Commissioners is committed to conducting performance reviews with the Board of Directors on a monthly basis.

1.3 The Board of Directors has followed up on the findings and recommendations of the Internal Audit Division, External Auditor, OJK supervision results and/or other authority supervision results.

1.4 In terms of carrying out the duties and responsibilities of the Board of Directors, in the period January-December 2024 the Board of Directors has held 213 (two hundred and thirteen) Internal Meetings.

1.5 The committees under the Board of Directors have held 483 (four hundred and eighty-three) meetings during the period of January-December 2024. The details are as follows:

1.5.1 Asset-Liability Committee had 15 meetings.
1.5.2 Information Technology Steering Committee met 4 times.
1.5.3 Risk Management and ESG Committee met 12 times.
1.5.4 Human Capital Committee met 16 times.
1.5.5 Loan Policy Committee or financing had 10 meetings.
1.5.6 Credit Committee had 387 meetings.
1.5.7 Business Committee met 3 times.
1.5.8 Transformation Steering Committee met 31 times.
1.5.9 The Environmental, Social and Governance Committee met 5 times.

1.6 The Board of Commissioners always ensures that the principles of Corporate Governance are implemented in all of the Bank's business activities.

1.7 In terms of carrying out the duties and responsibilities of the Board of Commissioners, in the period January-December 2024 the Board of Commissioners has held meetings including:

1.7.1 Internal Meeting of the Board of Commissioners was conducted 53 times.
1.7.2 The Board of Commissioners and the Board of Directors met 8 times.
1.7.3 The Board of Commissioners met with the Sharia Supervisory Board 3 times.

1.8 The Committee always carries out its duties independently through regular meetings with Divisions or Work Units regarding BTN's operational problems and conditions.

1.9 Each Committee has carried out its functions in accordance with the provisions, including providing recommendations according to its duties to the Board of Commissioners. In the period January-December 2024, the committees under the Board of Commissioners have held the following meetings:

1.9.1 Audit Committee 39 times.
1.9.2 Risk Monitoring Committee 61 times.
1.9.3 Remuneration and Nomination Committee 17 times.

1.10 Improving the implementation of Corporate Culture, namely: Sales Culture, Performance Culture, Governance & Risk Culture and Learning Culture.

1.11 BTN has submitted a report on the implementation of the duties of the Director in charge of the Compliance Function to the regulator in a timely manner.

1.12 To ensure that every regulation to be made, the Compliance Work Unit conducts a study/review to ensure that the regulation is in accordance with the provisions of the regulator and legislation. In the period January-December 2024, the Compliance Work Unit has conducted a study with the following details:

1.12.1 Operational Field as many as 271 studies.
1.12.2 Credit Field as many as 122 studies.
1.12.3 Fund Field as many as 34 Studies.

1.13 In an effort to prevent corrupt practices, BTN implemented the implementation of ISO 37001:2016 Anti-Bribery Management System (SMAP) certification. In 2024, BTN conducted an ISO surveillance audit on 15 Work Units and expanded the scope (extend scoop) of ISO SMAP on 1-work unit of Credit Operation Division (COD).

1.14 The implementation of the BTN Whistleblowing System has used the services of a third party, namely Deloitte Consultant, which is called WBS BTN SIIPS and BTN has collaborated with the Corruption Eradication Commission (KPK) regarding the Integrated Corruption Crime (TPK) Whistleblowing System (WBS).

1.15 The implementation of the internal audit function has been adequate and meets stakeholders' expectations, this is reflected in the reports submitted by the Internal Audit Division to the Board of Commissioners through the Audit Committee periodically (every quarter), namely the realization of the Annual Audit Plan, audit findings and recommendations, and completion of follow-up actions on audit results.

1.16 The appointment of the Public Accounting Firm (KAP) has been in accordance with the minimum requirements set out in accordance with the provisions and the audit implementation was carried out by an independent Public Accountant (AP) and the recommendations of the Audit Committee through the Board of Commissioners.

1.17 The Bank has conducted monthly monitoring of Risk Appetite and Risk Tolerance including analysis of excesses and impacts as well as recommendations and management directives in the Risk Appetite and Risk Tolerance monitoring report which is reported monthly and submitted routinely to the Board of Directors and all Divisions.

1.18 The Board of Directors and Board of Commissioners actively supervise risk management by discussing risk limits (risk appetite and risk tolerance) every month through meetings of the Board of Commissioners and Board of Directors.

1.19 Carrying out improvements to business and operational processes including:

1.19.1 The Bank has adjusted the BTN organizational structure after the 2024 AGM by considering the composition and nomenclature of the Board of Directors, the formation of SEVP and new Divisions.
1.19.2 Development of the Commercial Banking Division (CMBD) organizational structure for non-housing management in order to achieve targets and diversify the guideline portfolio as well as business development and partnerships for the expansion of the Commercial Banking Center (CBC) business.
1.19.3 Adjustment of business processes in the Retail Funding Division (RFD) based on retail funding segmentation to focus more on customer centric and clarify accountability.
1.19.4 Separation of Digital Banking work units that focus on sales, namely the Digital Banking Sales Division (DBSD) and the Digital Banking Product Development Division (DBPD) in order to improve Digital Banking capabilities.
1.19.5 Separation of Institutional Funding into Large Institutional Funding (LIFD) and Mid Size Institutional Funding (MIFD) which focus on Liquidity Buffer Customers and non-Liquidity Buffer Customers.
1.19.6 Development of Sharia Division (SHAD) organizational structure to strengthen Sharia business and IT.
1.19.7 Separation of functions in Operation Banking into two, namely Central Operations Division (CEOD) for managing basic operational functions and Digital Operations Division (DGOD) for managing business operations and business transactions.

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1.19.8 Separation of Risk Management functions into Digital & Operations Risk Management Division (DORD) and Enterprise & ESG Management Division (ERMD), where Digital & Operations Risk Management Division (DORD) manages digital risk and operational risk while Enterprise & ESG Management Division (ERMD) manages enterprise risk and ESG management.
1.19.9 Addition of personal data protection management function in the Compliance Work Unit in the form of Data Privacy Department.
1.19.10 Formation of Regional Digital Banking Retail at Regional Offices as a strategy to strengthen digital product sales.
1.19.11 Implementation of BPI Kring (National) which includes changes in business processes through the Regional Loan Processing Center (RLPC).
1.19.12 Implementation of the National Phase 1 Decision Engine as a loan decision tool.
1.19.13 The SME Micro Business Loan BTN Laku business process has been scaled up in all Regional Offices.
1.19.14 Implementation of the end-state phase for the MSMEs Process Centers (SPU) in the cities of Medan, Palembang, Banjarmasin, Balikpapan, Makassar, Depok, Cirebon, and Ciputat.
1.19.15 Formation of an anti-fraud sub-committee under the Risk Management Committee to accelerate the reporting and handling of fraud incidents.

1.20 Strengthening discipline of process and tiered control at every stage of the loan business process, in line with the increase in low-quality loan which is quite high, and the loan granting process is carried out comprehensively by consistently considering the 5 C's aspects.
1.21 In decision making, BTN has formed a Loan Policy Committee and a Loan Committee so that the loan process can run prudently.
1.22 During the January-December 2024 period, there were no violations and/or exceedances of the BMPK.
1.23 BTN has compiled, presented and transparently reported financial and non-financial conditions to stakeholders on a monthly, quarterly, semester and annual basis by publishing on the official website including announcing the quarterly Publication Financial Report and reporting it to the Financial Services Authority stakeholders in accordance with applicable regulations.
1.24 BTN has a Customer Complaint System that can be used by Customers through the Contact Center, Customer Complaint System (SPN), Customer Service or submitted through Bank officers.
1.25 The Corporate Governance implementation report has been submitted completely and on time to the Financial Services Authority or stakeholders in accordance with applicable regulations.
1.26 The Board of Directors has communicated the Bank's Corporate Plan and Business Plan to all levels of the organization and Controlling Shareholders.
1.27 The Board of Commissioners has carried out its functions and duties in terms of supervision (monitoring), namely directing, monitoring, and evaluating the implementation of the Bank's strategic policies routinely every 1 (one) month in a Performance Review meeting between the Board of Directors and the Board of Commissioners.
1.28 The Board of Directors routinely discusses policies and decisions related to the strategic plan through committee meetings preceded by a pre-committee/steering committee.

2. Negative Factors
In general, internal control is adequate but is still not running optimally, resulting in fraud cases.

3. Identify Problems and Causes (Root Cause)
Overall, the Governance Process is implemented well in every business and operational activity of the Bank, however, in its implementation, an understanding of the Standard Operating Procedure (SOP) is still required and supervision needs to be improved.

4. Strengths
4.1 The Bank continues to strive to improve internal control through: training/internalization, sanctions for coaching, implementation of rotation and transfer of HR.
4.2 The Bank has implemented the implementation of compliance functions according to regulations including the implementation of the Compliance Director function, implementation of reporting to regulators, implementation of monitoring and evaluation of compliance aspects in all work units, and programs to increase awareness and compliance culture for all employees.
4.3 In order to implement control of gratification and bribery, BTN has a Gratification Control Unit (UPG) and ISO 37001:2016 Anti-Bribery Management System certification which is under the supervision and management of the Compliance Division.
4.4 The Bank carries out its internal audit function well, namely including the implementation of independent supervision functions with adequate scope of duties according to the plan (audit plan), as well as the implementation of monitoring and reporting of audit results according to the provisions.
4.5 The Bank has implemented risk management functions in accordance with regulations, including the Implementation of the Risk Director Function, preparing Risk Management policies including written and comprehensive Risk Management strategies and frameworks including determining overall risk limits and per type of risk, taking into account the level of risk taken and risk tolerance to capital adequacy. The Bank also periodically identifies, measures, monitors and controls risks
4.6 There is an adequate process to ensure the provision of funds to related parties and the provision of large amounts of funds (large exposure) in accordance with the principle of prudence with a mechanism for decision-making by management independently without intervention from related parties and/or other parties
4.7 In decision-making, BTN has formed a Loan Policy Committee and a Loan Committee so that the loan process can run prudently.
4.8 The Bank makes the Bank's product information transparent in accordance with the provisions governing the Transparency of Bank Product Information and develops processes in terms of managing the Use of Customer Personal Data in accordance with laws and regulations.
4.9 The Bank is always committed to improving the quality of business processes and governance through various strategic initiatives in accordance with the Bank's Strategic Plan, the implementation of which is supported and monitored periodically by the Board of Directors and there is a supervisory mechanism by the Commissioners.

C. Governance Outcome
The results of governance are generally **adequate**, which can be seen from the following summary:

1. Positive Factors
1.1 The Board of Commissioners and the Board of Directors have been accountable for the implementation of their duties to the shareholders and have been accepted by the shareholders in the Annual GMS for the 2023 Fiscal Year held on March 6, 2024.
1.2 The Bank has improved its performance in order to realize the 2024 RKAP target by establishing an effective business strategy.
1.3 The Financial Statements as of December 31, 2024 (Unaudited) are better than the previous year with the following details: (in billions)

ANALYSIS

No.	Kinerja	Posisi Desember 2023	Posisi Desember 2024
1.	Aset	439,885	470,137
2.	Laba	3,419	3,028
3.	DPK	349,933	381,848
4.	Kredit/Pembiayaan	333,698	357,973
5.	Kualitas Kredit	3.01%	3.19%

1.4 Compliance Indicators as of December 2024
1.4.1 The CAR (Capital Adequacy Ratio) that has been formed by the Bank after calculating loan risk, operational risk, and market risk as of December 31, 2024 is 18.15%, while the KPMM (Minimum Capital Requirement) ratio according to the risk profile that must be formed by the Bank for the position of December 31, 2024 is 9.25%. Thus, BTN's capital adequacy ratio is still above the minimum limit required by the regulator in the capital provisions.
1.4.2 There was no excess or violation of the provisions of the Maximum Loan Limit (BMPK).
1.4.3 Non-Performing Loan (NPL) is 3.19% (gross).
1.4.4 The Minimum Reserve Requirement (GWM) for IDR Conventional as of December 31, 2024 is 5.38%, thus fulfilling the minimum limit requirement of 5%. The Minimum Reserve Requirement (GWM) for Foreign Currency as of December 31, 2024 is 4.18%, fulfilling the minimum limit requirement of 4%.

2. Negative Factors
2.1 There is still a fine imposed during the period of January to December 2024 amounting to IDR 108,636,725, - (one hundred eight million six hundred thirty six thousand seven hundred twenty five IDR) although it has improved compared to the same period of January to December 2023, which was IDR 677,520,854, - (six hundred seventy seven million five hundred twenty thousand eight hundred fifty four IDR).
2.2 There are still a number of violations of the provisions that result in fraud where the period January to December 2024 the number of fraud was 24 (twenty four) cases which increased compared to the period January to December 2023 as many as 19 (nineteen) cases. However, all cases of fraud have been followed up by the relevant units.

3. Identify Problems and Causes (Root Cause)
3.1 The need to improve understanding of SOPs and strengthen supervision.
3.2 The need to improve reporting systems and infrastructure.

4. Strength
4.1 The Board of Directors has established the General Policy of the Board of Directors (KUD), namely "Becoming a Game Changer in the Disruptive Technology Era" and has prepared 10 (ten) strategies in 2024, including:
4.1.1 Increase CASA by improving KPI tracking, virtual RM, and becoming a transactional bank for retail customers.
4.1.2 Accelerate the development of digital capabilities through the development of digital super-apps and scale-up transactions and activation of transaction banking.
4.1.3 Expansion of high yield loan by going beyond the subsidy segment, exploring new consumers, cross selling to mortgage customers who have paid off, and improving SME processes.
4.1.4 Build new sources of growth by offering full banking solutions and developing partnerships.
4.1.5 Increase FBI from Treasury, Corporate Banking, and Bancasurance businesses.
4.1.6 Strengthen Value Proposition and Rebranding (going beyond home/mortgage).
4.1.7 Improve collection processes and asset recovery capabilities (monitoring on & off-balance sheet, improving collection processes, savings programs for installments, improving SME Collection processes).
4.1.8 Become an ESG Champion in the Banking Sector.
4.1.9 Attract, Develop, & Retain Best Talent by creating and redefining Employee Value Preposition (EVP) and focusing on talent development and talent retention.
4.1.10 Smooth spin-off of BTN's Sharia Business Unit (UUS).
4.2 BTN has prepared the 2025-2029 Corporate Long-Term Plan (RJPP) and the 2025-2027 Bank Business Plan.

Recommendations and Follow Up

Problem	Follow-up
There are still a number of violations of the provisions that result in fraud.	The Company is committed to making improvements in the implementation of the Anti-Fraud Strategy, including: 1. Prevention: Monitoring and evaluation/improvement of SAF policy prevention function. Identification of vulnerabilities includes activities: Fraud Risk Assessment (FRA), Risk Control Self Assessment (RCSA), RA/RT Planning, use of Fraud Risk Register. 2. Detection: Digital Fraud Monitoring & Detection: develop rules, models, customer risk profiles for FDS accuracy and also monitor Flagged/Triggered activities on FDS, Non-Digital Fraud: coordination, consolidation, evaluation of detection results from surprise audit programs, surveillance systems, verification, control testing and supervision.

Problem	Follow-up
	3. Investigation, Reporting, and Sanctions: Monitoring includes prevention, investigation progress status, fraud detection results, investigation results, sanction determination, recovery to litigation. DORD has submitted a consolidated report every 3 months to the Anti-Fraud Sub-Committee and the Board of Commissioners. The contents of this consolidated report include fraud detection results, investigation status and aging, investigation results, follow-up settlement, sanction determination to litigation. 4. Monitoring, Evaluation and Follow-up, Monitoring of fraud event status, imposition of sanctions, completion of action plans, and recovery efforts, evaluation of fraud event reports, Preparation of preventive follow-up actions.

Assessment by External Parties

In addition to Self-Assessment, the Company has also consistently conducted Third Party assessments to attain a second opinion on the quality of the GCG implementation to unceasingly refine the quality of the GCG implementation; this includes the Corporate Governance Perception Index survey, hereinafter abbreviated as CGPI, which is organized annually by the Indonesian Institute for Corporate Governance (IICG) and the GCG assessment is based on the ASEAN Corporate Governance Scorecard standards conducted by the FSA and the Indonesian Institute for Corporate Directorship (IICD).

GCG Rating - Corporate Governance Perception Index (CGPI) Award

The Company constantly takes part in ratings and the Corporate Governance Perception Index survey, hereinafter abbreviated as CGPI, every year, which is organized by the Indonesian Institute for Corporate Governance (IICG). CGPI is a research program and rating of the quality of corporate governance with the following assessment stages:

1. The instrument and Document Analysis Stage is conducted through the following activities:
   a. Self Assessment.
   b. Document Assessment.
2. Observation Stage
   The observation stage is performed through clarification of the assessment instruments and the Company's documents' extensiveness, executive exposure, and internal discussions.

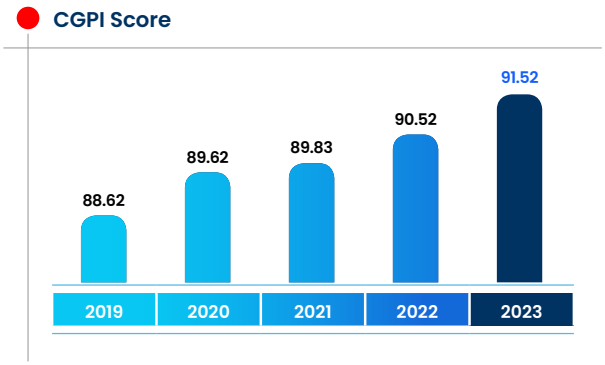
Assessment Criteria

The assessment aspects of CGPI include Governance Structure, Governance Process, and Governance Outcome).

Party Conducting the Assessment

The party that conducted the CGPI assessment is The Indonesian Institute of Corporate Governance (IICG).

Rating Score



The results of the CGPI assessment over the past five years have become a reference for companies in improving the implementation of GCG in a measurable manner. In 2024 (for the 2023 financial year assessment), the Company recorded an increase in score compared to the previous year. This achievement reflects the Company's commitment to continue to support the achievement of the company's vision and mission in a sustainable manner.

Recommendations and Follow Up

No.	Recommendation	Follow-up Action
Governance Structure		
1.	BTN needs to consider and respond to gender diversity within the structure of the Board of Commissioners.	The structure of BTN's Board of Commissioners has taken gender diversity into account. Currently, the Board of Commissioners consists of 9 (nine) members, of which 1 (one) is a woman.
2.	BTN needs to establish an organizational structure design that aligns with the company's business plan and fills the vacancies in the functional structure that are under the responsibility of the Board of Directors.	BTN updated its organizational structure in 2024, outlined in Technical Guidelines Number PT.3-A.6 regarding the Organizational Structure of the Head Office, Regional Offices, and Branch Offices.

No.	Recommendation	Follow-up Action
3.	BTN needs to periodically update its policies and corporate strategies through comprehensive risk-based analysis related to the dynamics of the business and industrial environment to optimize the company's potential.	To strengthen governance and eliminate regulatory overlaps while facilitating employees' daily operational activities, the Bank undertook a transformation, including transforming internal regulations. All existing Internal Regulations under the old Policy and Procedure Architecture have been transformed into the New Policy and Procedure Architecture with the following details: 1. 10 (ten) General Policies have been issued as Umbrella Policies for all operational activities of the Bank. 2. 153 (one hundred fifty-three) Specific Policies (KK) have been issued as derivative regulations of the General Policies. 3. 280 (two hundred eighty) Technical Guidelines have been issued as derivative regulations of the Specific Policies.
4.	BTN needs to optimize data governance policies that comply with applicable regulations, refer to best practices, and align with the Company's strategic plan.	BTN has established data governance policies through Specific Policy Number KK.9-M on Data Governance Guidelines and Technical Guidelines Number PT.9-M.1 on Data Governance Guidelines.
Governance Process		
1.	BTN needs to optimize the strengthening of internal controls, including through the implementation of Internal Control over Financial Reporting (ICOFR) to enhance reporting accountability aligned with the Company's strategic plan.	The Company conducted an ICOFR Diagnostic Review with an independent consultant, aimed at enhancing internal control over financial reporting. In implementing OJK Regulation Number 15 of 2024 concerning the Integrity of Bank Financial Reporting, the Company currently has internal policies related to ICOFR.
2.	BTN needs to optimize the implementation of a comprehensive risk culture and evaluate its implementation to create a strong foundation for optimizing sustainable business growth while maintaining alignment with the established risk appetite.	Strengthening the risk culture is essential to maintaining commitment and ensuring that the risk culture policy is understood and implemented by all management and employees. The risk culture strategy is aligned with the Bank's risk management strategy. The Bank establishes an annual risk culture roadmap aligned with the desired maturity level, monitors the risk culture implementation by measuring risk culture maturity levels at least once a year by internal teams and once every three years by independent external teams. Some of BTN's risk culture implementation and enhancement programs include: 1. Risk Economic Outlook is an annual agenda discussing strategies for setting risk appetite and risk tolerance. This forum raises risk awareness among the Board of Commissioners and Directors to enable strategic decision-making 2. The Bank actively conducts Portfolio Quality Review Forums attended by the Board of Directors, Divisions, CBC, and Branch Offices to provide updated insights into credit positions and quality both bankwide and per credit segment. 3. Visits and awareness programs for internal control testing and data cleansing were conducted to improve the quality of the loss event database at BTN. 4. Fostering a compliance culture by ensuring that every business process adheres to applicable internal and external regulations and SOPs. 5. Continuous preventive measures are implemented to avoid significant weaknesses in the first line of defense, accompanied by corrective action plans through coordination between the Risk Management Unit and the Internal Audit Unit. 6. Operational risk control is strengthened through various activities such as seminars, workshops, and risk outlooks. 7. Risk management culture is internalized through socialization, training, and e-learning on risk culture for all employees via BTNbest, with understanding levels measured through quizzes. 8. The Bank has an operational risk control system across its entire network. BTN raised awareness of the use of the ORMIS Application as part of risk management implementation across all branch office networks. 9. An annual Event Culture Day is organized by BTN, inviting external speakers to enhance risk awareness across all organizational levels. This event integrates risk awareness into every operational and business activity while instilling values that support achieving risk management goals in alignment with the Bank's business objectives. 10. Risk awareness activities related to IT, Digital, and Cyber Risks are regularly conducted, involving all employees through e-learning and socialization via branch office visits. These activities enhance risk understanding and awareness in IT, Digital, and Cyber areas to support comprehensive risk management. 11. Fraud vulnerability risk awareness is conducted through Fraud Risk Assessment (FRA) across all Work Units.

No.	Recommendation	Follow-up Action
3.	BTN needs to develop mitigation measures and improve work processes to prevent the occurrence or recurrence of fraud, non-fraud cases, penalties/ fines, and other violations.	In line with OJK Regulation 12/2024 on the Implementation of Anti-Fraud Strategy (SAF) for Commercial Banks, BTN has developed a roadmap for the Anti-Fraud Strategy (SAF) for the next three years (2024-2026). This roadmap is based on the four pillars set by Financial Services Authority (OJK), expanded into ten aspects: 1. Organization, 2. Strategy & Policy, 3. Procedure and Governance, 4. Process, 5. Fraud Investigation 6. System, 7. Use of Data, 8. Use of Analytics, 9. Digital Channels, 10. Reporting/Training.
4.	BTN needs to develop a structure and system related to consumer/customer protection and empowerment, ensuring reliability and periodic evaluation of its implementation.	BTN has established Special Policy No. KK.9-Z dated August 31 concerning Customer and Community Protection. This policy ensures maximum protection for customers and the public by providing clear, accurate, and transparent information about products and/or services offered by the Bank. The implementation of BTN's consumer protection principles includes: 1. Strengthening HR and Consumer Protection Infrastructure: Establishing a structure at each BTN Branch Office to implement consumer protection principles seriously. 2. Strategic Planning Cycle for Financial Literacy and Inclusion Education: BTN has developed education, literacy, and inclusion programs aimed at consumers and the community, conducted periodically each year to enhance Digital Inclusion Development. 3. Internal Consumer and Community Protection Regulations: Adopting external regulations related to consumer protection (Customer Protection, Education and Inclusion, Personal Data Protection) as internal BTN policies to guide Bank activities. 4. Improving Complaint Services: Providing easily accessible complaint channels and ensuring complaint handling complies with the applicable Service Level Agreement (SLA).
5.	BTN needs to ensure the reliability and security of data, networks, systems, and information technology to safeguard against hacking risks and misuse by unauthorized parties.	To maintain Information Technology (IT) security, BTN focuses on three main pillars: People, Process, and Technology. More detailed information can be found in the Information Technology section.
6.	BTN needs to optimize the use of information technology and data to periodically evaluate the impact of ESG implementation and sustainable finance.	The Company measures and evaluates the implementation of resilience and security controls to optimize information security processes, including: 1. Obtaining ISO 27001:2022 Certification To ensure that human resources, governance, and technology comply with industry standards (International Standard Organization), BTN has undergone the certification process and received certification number IS 790715. 2. Achieving Cyber Security Maturity (CSM) BTN, in collaboration with the National Cyber and Crypto Agency (BSSN), conducted a Cyber Security Maturity (CSM) assessment to measure the level of information security implementation and maturity at BTN. Based on the assessment results by BSSN, BTN achieved maturity level 5 (Optimal Implementation), indicating well-organized and automated cybersecurity implementation, conducted formally, consistently, periodically reviewed, and continuously improved. 3. Implementing IT Security Index BTN developed an IT Security Index to monitor the effectiveness of security awareness programs aimed at fostering a Security Culture among employees across all Work Units, mitigating risks related to cybersecurity and information security.

No.	Recommendation	Follow-up Action
7.	BTN needs to optimize the system and mechanism for innovation management continuously, considering adopting or obtaining certification under ISO 56002:2019 - Innovation Management System.	BTN is committed to ensuring that all financial products and services offered meet high standards of equality, security, and compliance while mitigating potential risks. All products and services, whether new or updated, are designed with customer needs in mind, including features, convenience, reliability, and regulatory compliance. Before launch, all products and services undergo thorough testing to ensure the protection of customer personal data and secure transactions according to established standards. This process is part of risk mitigation efforts to prevent service disruptions and safeguard customer data integrity.
Governance Outcome		
1.	BTN needs to take progressive measures in handling all ongoing legal matters and strive for optimal risk mitigation for all legal disputes, as well as preventing the recurrence of legal issues for the Company.	The Bank has assigned employees in Regional Offices as Regional Legal Representatives (RLR) who have the following duties and responsibilities: 1. Providing legal assistance for litigation issues raised by any work unit related to the Bank's operational activities within their respective jurisdictions. 2. Carrying out legal activities representing the Bank in court proceedings or out-of-court settlements within their jurisdiction. 3. Providing legal opinions and consultations on litigation issues raised by work units within their jurisdiction. 4. Performing legal watch functions within their respective regions.
2.	BTN needs to evaluate follow-up actions related to relationships with all Company stakeholders to enhance stakeholder engagement and increase Company value.	BTN actively involves stakeholders in the process of formulating sustainability agendas by considering the Bank's social responsibility, environmental concerns, and prioritizing strategic communication with various partners. In identifying stakeholder groups, the Bank sets several criteria to ensure constructive and mutually supportive engagement in achieving sustainability objectives. These criteria include: 1. Influence The stakeholders influence decisions made by BTN related to business sustainability. 2. Dependency BTN depends on these stakeholders, either directly or indirectly. 3. Needs These stakeholders understand the needs, expectations, and aspirations of each stakeholder group related to the company's activities, products, or services. 4. Diversity These stakeholders possess diverse characteristics, backgrounds, and interests, which must be understood and respected to ensure inclusive policies and decisions that fairly meet various needs. 5. Willingness to participate hese stakeholders are willing to engage in decision-making processes and corporate initiatives to achieve mutually beneficial goals.
3.	BTN needs to enhance the handling of complaints received from various sources to build greater trust among the Company's stakeholders.	The Company has collaborated with the Corruption Eradication Commission (KPK) of the Republic of Indonesia concerning the handling of the Whistleblowing System (WBS) as part of the anti-corruption effort. This collaboration aims to build and enhance the effectiveness and efficiency of complaint handling both internally and externally, integrating professional, transparent, and accountable mechanisms while prioritizing confidentiality to optimize the eradication of corruption.
4.	BTN needs to improve the evaluation of Social and Environmental Responsibility (TJSL) measurements with TJSL performance indicators as part of sustainable financial disclosures.	BTN has established the ESG Committee and ESG Department responsible for governance and sustainability initiatives. BTN also promotes responsible banking culture through sustainability training for key employees. BTN's sustainability report is prepared in accordance with the Global Reporting Initiative (GRI) standards and verified using AA1000 to ensure accuracy and transparency. BTN remains committed to setting more specific sustainability targets and measuring progress through Key Performance Indicators (KPI). With an integrated strategy, BTN actively supports community welfare, environmental preservation, and sustainable economic growth.

GCG Assessment Based on ASEAN Corporate Governance Scorecard (ACGS)

Another GCG assessment that the Company participates in is the ASEAN Corporate Governance Scorecard, a standard for measuring Governance practices agreed upon by the ASEAN Capital Market Forum (ACMF). The ACGS is an initiative of ASEAN countries as members of the ACMF to support corporate governance practices to promote ASEAN as a classy asset and increase global investors' confidence in the quality of companies in the ASEAN region.

Assessment Criteria

The ACGS assessment has 5 aspects which are categorized into the following 2 levels:

1. Level 1 consists of 5 parts as follows:
   - Part A: Rights of Shareholders
   - Part B: Equitable Treatment of Shareholders
   - Part C: Role of Stakeholders
   - Part D: Disclosure and Transparancy
   - Part E: Responsibility of the Board
2. Level 2 consists of Bonus and Penalty.

Parties Conducting the Assessment

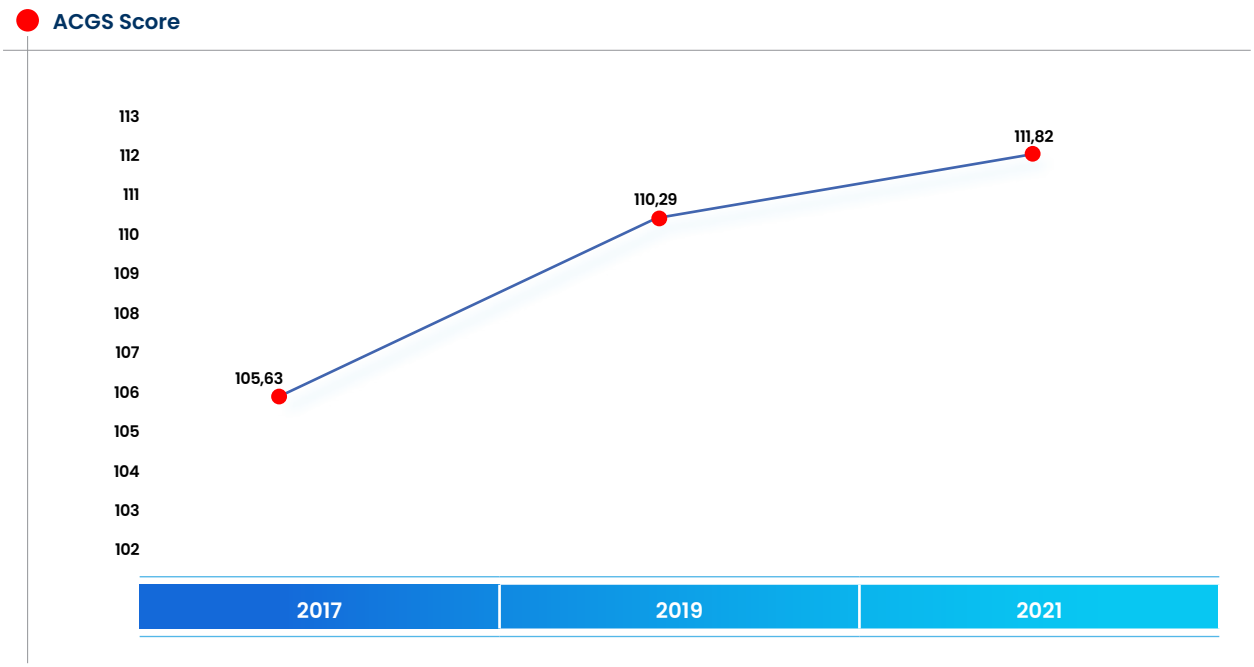
Each ASEAN country appoints representatives of the Domestic Ranking Body (DRB) and Corporate Governance (CG) Experts to conduct assessments based on ACGS parameters. In this regard, DRB and CG Experts from Indonesia are represented by PT RSM Indonesia.

Score Ratings

Based on the assessment results of 100 listed companies based on the ACGS criteria carried out by representatives of CG Expert and DRB Indonesia (PT RSM Indonesia) in 2022 and the results were announced on December 1, 2022, BTN successfully obtained awards in the following 2 categories "Top 3 Indonesian PLCs" and 10 (ten) listed companies in Indonesia that are included in the category "ASEAN Asset Class Thresholds.

Based on the results of the ASEAN Asset Class assessment in 2021 for the 2020 Fiscal Year, there were 10 Indonesian Listed Companies with a score of 97.5 and above.
There are 3 (three) Listed Companies that received the highest ACGS score (Top 3 Indonesia PLCs), one of which is PT Bank Tabungan Negara (Persero) Tbk. In addition, the Company also received an award as a Listed Company included in the ASEAN Asset Class category. Based on the ACGS assessment report submitted by the Financial Services Authority (OJK) and the Indonesian Stock Exchange (BEI), the Company's total score based on ACGS parameters in 2021 is 111.82. This score increased from the Company's score at the 2019 ACGS event held by ACMF with a score increase
of 1.53 points. This assessment is reviewed based on disclosure of the Company's governance practices through information that is publicly available and accessible to the general public, and includes information contained in the annual report, website, announcements and circulars made by the Company. The information used in the assessment is information presented in English with a cut-off date of 31 August 2021. Based on the results of the 2021 ASEAN Asset Class assessment, the Company was successfully designated as a Top 3 company of Indonesian PLCs and ASEAN Asset Class.

In the last 3 (three) year periods, BTN's ACGS scores were as follows:



In 2024, the Company also prepared for the 2024 ACGS assessment based on the ACGS Revised Version 2 – March 2024 criteria. This indicates that the implementation of GCG within the Company has continued to improve year by year.

Level/ No. Item	Corporate Governance Standart Criteria	Status	GAP
Level 1			
A.1	Basic Rights of Shareholders.	Comply	
A.2	The right to participate in decisions regarding fundamental corporate changes.	Comply	
A.3	The right to participate effectively and use votes in the GMS as well as the right to obtain information regarding the rules that apply to the GMS.	Comply	The Company has not disclosed the use of independent parties (observers) to carry out/ validate the vote count at the GMS.
A.4	Markets for corporate control must be allowed to function efficiently and transparently.	Comply	
A.5	The exercise of ownership rights by all shareholders, including institutional investors, must be facilitated.	Comply	
B.1	Voting rights and share ownership.	Comply	
B.2	GMS Notification	-	a. Disclosure of the profiles of candidates for the Board of Commissioners and Directors is not yet available in the GMS Invitation. b. The invitation to the GMS does not contain information regarding the External Auditor who will be appointed at the GMS.
B.3	Prevent insider trading and abuse for personal gain.	Comply	

Level/ No. Item	Corporate Governance Standart Criteria	Status	GAP
B.4	Related party transactions carried out by the Board of Commissioners and Directors.	Comply	
B.5	Protecting minority shareholders from violations.	Comply	
C.1	Hak-hak pemangku kepentingan yang ditetapkan oleh hukum atau melalui perjanjian bersama harus dihormati.	Comply	
C.2	Stakeholder interests are protected by law, stakeholders must receive effective redress for any violation of their rights.	Comply	
C.3	Mengembangkan mekanisme peningkatan kinerja untuk karyawan.	Comply	
C.4	Stakeholders including individual employees and their representative bodies, must be able to freely communicate their concerns about illegal practices or unethical actions to the Board of Commissioners and their rights must not be compromised in doing this.	Comply	
D.1	Ownership Structure Transparency	Comply	
D.2	Quality of Annual Report	-	The Company has not disclosed the remuneration of each member of the Board of Directors and Board of Commissioners.
D.3	Disclosure of Related Party Transactions	Comply	
D.4	Relationship between Director and Board of Commissioners in Company Shares.	Comply	
D.5	External Auditor and Auditor's Report	Comply	
D.6	Communication Media	Comply	
D.7	Timely Submission/Issuance of Annual/Financial Reports	Comply	
D.8	Company Website	Comply	
D.9	Investor Relations	Comply	
E.1	Board Duties and Responsibilities	Comply	
E.2	Board Structure	Comply	Not all members of the Nomination and Remuneration Committee are independent commissioners.
E.3	Board Process	Comply	
E.4	Board Position	Comply	
E.5	Board Performance	Comply	

Recommendations and Follow-up

No.	Recommendation	Follow-Up Action
1	Provide opportunities for all shareholders to individually vote for candidates for the Board of Directors and/or Board of Commissioners.	The Company has provided opportunities for all shareholders to vote for candidates for the Board of Directors and/or Board of Commissioners individually. However, individual voting for each Director and/or Commissioner was not conducted.
2	Disclose the involvement of External Stakeholders in exchanging views and providing suggestions on material sustainability issues relevant to the Company's business.	The Company has disclosed the involvement of External Stakeholders in exchanging views and providing suggestions on material sustainability issues relevant to the Company's business, as stated on the Company's website.
3	Ensure the Company discloses information regarding remuneration details along with the total amount paid for each member of the Board of Commissioners	The Company ensures the disclosure of remuneration for each member of the Board of Commissioners. The remuneration should include the following: 1. Fees 2. Allowances 3. Other salaries (including benefits in kind). The Company has disclosed detailed information on the remuneration received by each member of the Board of Commissioners and Directors, but has not yet disclosed the total remuneration paid.
4	Disclose that an annual performance evaluation of the Board of Directors and Board of Commissioners has been conducted in the current year.	The Company has disclosed information on the annual performance evaluation of the Board of Directors and Board of Commissioners for the current year, as presented in the annual report.

GCG Assessment in TOP GRC 2024

The Company also participated in the TOP GRC 2024 event, which is an annual corporate rating (award) activity in the field of Corporate Governance (GCG). Risk Management, and Compliance Management. The purpose of organizing TOP GRC is to encourage the improvement of the company's business through the development of policies and implementation of Integrated GRC. The theme of TOP GRC 2024 is **"Leadership for Sustainable Impact: GRC, ESG, and SDGs"**. In organizing the TOP GRC 2023 award, Top Business Magazine collaborated with the Indonesian GRC Association, IRMAPA (Indonesian Risk Management Professional Association), ICoPI (Indonesian Compliance Professional Institute), and PaGi (Indonesian Governance Professional Association), and was supported by several GCG and Risk Management consulting companies. The stages that have been carried out include:

a. Implementation of the interview and question and answer stages conducted by the Board of Commissioners, Board of Directors and the Top GRC 2023 Jury was on June 20, 2024.
b. On September 5, 2024, the TOP GRC 2024 awards ceremony was held, BTN successfully received awards including:

1) **PT Bank Tabungan Negara (Persero) Tbk** as **#5 Stars**, namely Systems, infrastructure, and implementation related to Good Corporate Governance (GCG), Risk Management, and Compliance Management, as well as the use of digital technology in the company, are at a Very Excellent (Extraordinary) level, so that it greatly supports the success of GRC implementation and the improvement of the company's sustainable business performance.
2) **PT Bank Tabungan Negara (Persero) Tbk** as **TOP GRC Awards 2024 # Golden Star Trophy**, namely Winner of TOP GRC Awards - 5 Star Predicate, for 3 consecutive years or 3 times non-consecutive, in 5 years.
3) **Mr. Nixon L.P. Napitupulu (President Director of PT Bank Tabungan Negara (Persero) Tbk)** as **The Most Committed GRC Leader 2024**, namely This award is given to Business Leaders or President Directors/Top Leaders in companies who are considered to have a high commitment in supporting the completeness of systems and infrastructure and the success of GRC implementation in the company.
4) **The Board of Commissioners of PT Bank Tabungan Negara (Persero) Tbk** as **The High Performing Board of Commissioners on GRC 2024**, namely an Award to the Company's Board of Commissioners, which is considered to have a high commitment in supporting the completeness of the system and infrastructure as well as the successful implementation of GRC in the company.

GCG Evaluation Based on GRC & Performance Excellence

The Company also participated in the GRC & Performance Excellence 2023 event, an annual corporate rating (award) in the fields of Corporate Governance (GCG), Risk Management, and Compliance. The program aims to drive business improvement through the development and implementation of corporate governance policies, risk management, and compliance with regulations in an integrated manner. Stages conducted include:

- Implementation of the interview and question and answer stages conducted by the Board of Commissioners, Board of Directors and the 2023 GRC & Performance Excellence Jury was on July 18, 2024.
- On August 30, 2024, the 2024 GRC and Performance Excellence awards ceremony was held, BTN successfully received awards including:
  1. PT Bank Tabungan Negara (Persero), Tbk as The Greatest Champions Of GRC Excellence Performance 2024 (Banking Industries).
  2. PT Bank Tabungan Negara (Persero), Tbk as The Best GRC For Board Of Director 2024 (Banking Industries).
  3. Mr. Nixon Napitupulu as The Best Chief Executive Officer 2024 (Banking Industries).
  4. Mr. Eko Waluyo as The Best Chief Compliance Officer 2024 (Banking Industries).

ASEAN CG SCORECARD ASSESSMENT BY IICD 2024

The ASEAN Corporate Governance Scorecard (ACGS) is implemented to support efforts aimed at enhancing investor confidence in the quality of companies in the ASEAN region through the improvement of governance standards and practices. ACGS is participated by entities from all ASEAN jurisdictions, including Indonesia, Malaysia, the Philippines, Singapore, Thailand, and Vietnam. The benefits and objectives of the ASEAN CG Scorecard are as follows:

a. The need for a reference that can be used as a guide in preparing an effective strategy for improving future corporate governance practices.
b. Enhancing standards and practices of corporate governance for publicly listed companies in ASEAN.
c. Boosting global investment attractiveness for well-governed publicly listed companies in ASEAN.

Based on the assessment conducted by the Indonesian Institute for Corporate Directorship (IICD), Bank BTN has successfully achieved the following category:

a. TOP 50 Companies with the Largest Market Capitalization (BigCap PLCs) with Best Corporate Governance Practices.
b. The Best Financial Sector 2024.

SOCIAL AND ENVIRONMENTAL RESPONSIBILITY PROGRAM



Throughout 2024, the Company successfully implemented the right strategies and initiatives so that the Company successfully recorded positive and sustainable achievements. Until December 2024, the Company successfully distributed 2024 Corporate Social and Environmental Responsibility (CSER) funds amounting to IDR88.96 billion, through various activities carried out in the CSER Program that support the Company in achieving Sustainable Development Goals.





The Company's Social and Environmental Responsibility – later abbreviated to CSER- of SOEs is the implementation of the company's commitment towards sustainable development. This program aims to make a constructive contribution to the economy, social sector and environment, as well as regulation and governance in accordance with integrated and directed principles. This program ought to generate measurable impacts, is accountable and becomes a part of the Company's business approach. As one of the biggest banks in housing loans (KPR) as well as a state-owned enterprise (SOEs), the Company is committed to supporting sustainable development. Factual assistance is provided by the Company by conducting selected financing following the principles of sustainable finance.

The Company continues to strengthen its commitment to social and environmental responsibility through integration with the Sustainable Development Goals (SDGs) and implementation of the Social and Environmental Responsibility (CSER) program. As a form of implementation of the Minister of BUMN Regulation PER-1/MBU/03/2023 concerning Special Assignments and Social and Environmental Responsibility Programs for State- Owned Enterprises, the Company has prepared initiatives that focus on sustainable development goals and concern for the environment.

The Ministry of SOEs encourages all corporations under its supervision to support the success of the CSER of SOEs program to make contributions to society. The program focuses on three priority areas namely education, environment and development of micro, small and medium enterprises (MSMEs). The implementation of the BUMN CSER Program applies the principles of integration, direction, measurable impact and accountability.

The accomplishment of the Company's CSER Program intends to make contributions to sustainable development, support business in the long term and fulfill the expectation of related stakeholders. The Company interprets the CSER program not only as an endeavor to construct a harmonious and mutualistic relationship with the environment, community and stakeholders on local, national and global scale but also as an effort to make a positive impact and contribution to sustainable economic development. The moral duty of the company is to help the business flourish and improve the domestic sustainable economy by holding onto integrity values, obeying the law and constitution and upholding business ethics.

The TJSL program in 2024 is focused on the main pillars based on the Regulation of the Minister of State-Owned Enterprises Number PER-05/MBU/04/2022 concerning the Social and Environmental Responsibility Program of State-Owned Enterprises and the Regulation of the Minister of State-Owned Enterprises of the Republic of KPR Number PER-6/MBU/09/2022 concerning Amendments to the Regulation of the Minister of State-Owned Enterprises Number PER-05/MBU/04/2022 concerning the Social and Environmental Responsibility Program of State-Owned Enterprises and PER-01/MBU/03/2023 concerning Special Assignments and Social and Environmental Responsibility Programs of State-Owned Enterprises, namely social, environmental, economic, and legal and governance.

CSER Program was implemented in accordance with the main pillars, described below:

1. Social, achieving the fulfillment of quality basic human rights fairly and equally to improve the welfare of the community.
2. Environment, implementing sustainable management towards natural resources and environment as the support for all lives.
3. Economy, attaining quality economic growth through sustainable employment and business opportunity, innovation, inclusive industry, adequate infrastructure, affordable clean energy and supported by partnerships.
4. Legal and Governance, realizing legal certainty and effective, transparent, accountable and participative governance to create security stability and achieve a state based on law.

Throughout its implementation, CSER Program is in accordance with the following principles:

1. Integrated, meaning that it is conducted based on risk analysis and business processes relevant to the stakeholders.
2. Targeted, meaning that it goes in a clear direction to reach the Company goals.
3. Measurable, meaning that it makes contributions and presents benefits that bring transformation or added value for stakeholders and the Company.
4. Accountable, meaning that being accountable to avoid potential abuse and irregularity.

The current CSER Program is no longer referred to the old Corporate Social Responsibility (CSR) model that is based on charity or philanthropy activities but is supposed to create added value or Creating Shared Value (CSV). CSV refers to the CSER agenda that offers sustainable added value for the community and is able to present benefits for Company in line with the Focus and Pillars of CSER.

Differences between CSR Programs and CSER Creating Shared Value (CSV)

	CSR	CSER CSV
Philosophy	Pure social assistance (charity, philanthropy)	Social support which offers/creates economic value for beneficiaries and Companies
VALUE	Good deeds with no return to the Company	• It provides solutions to social problems, offering sustainable economic benefits to the community • BTN receives impacts from the social assistance
Outcome	Benefits are bounded only for recipients and are not sustainable	It gives social, economic and environmental impacts on the community and is related to sustainable company business

The The Company's Commitment to Social and Environmental Responsibility

The Company views the implementation of Social and Environmental Responsibility (CSER) as a form of accountability for the existence of the Company to all stakeholders. The Company carries out various activities in the CSER Program that are appropriate and relevant to the Company's business and activities as well as possible. The implementation of the TJSL program is carried out as a form of the Company's participation in efforts to improve the economic level of the community directly affected by the economic crisis caused by the Covid-19 pandemic, as well as part of its contribution to sustainable development.

The Company provides support and contribution to the achievement of SDGs, namely development that prioritizes harmony between economic, social and environmental aspects. With the support and contribution, the Company believes that it has laid down a sustainable foundation, i.e. by creating long-term value which is through the creation of sustainable competitive advantage not only for the Company, but also for the wider community and environment and strengthening resilience.



Sustainable Development Goals (SDGs) are a global action plan agreed by the world leaders, including Indonesia's. Indonesia's commitment to realizing Sustainable Development Goals is stipulated through Presidential Regulation No. 59 of 2017 on the Implementation of the Achievement of Sustainable Development Goals. SDGs contains 17 Goals and 169 Targets which are expected to be achieved by 2030. The Company is aware of its obligation to participate in the achievement of the SGDs, especially at point 11, i.e. developing decent, safe and affordable cities and settlements for everyone by 2030 through house ownership financing (KPR) products for the community.

ESG And CSER Program Committee

In proposing this ESG framework, strategy and roadmap, the Company also pays attention to stakeholder involvement, including conducting benchmarking with companies that have implemented ESG both domestically and abroad and holding an ESG Workshop with internal participants consisting of 20 divisions, which aim to be supporting validators for the proposed draft ESG framework, strategies and initiatives, thereby forming an ESG framework that is in line with the Company's readiness and ambitions.

Duties and Responsibilities of the ESG Committee

The Environmental, Social and Governance (ESG) Committee, which was formed to achieve Sustainable Development Goals and Climate targets, plays a role in providing recommendations to the President Director to formulate policies, strategies and targets for ESG and CSER programs that have an impact on the environment, social and governance as well as facilities in carry out monitoring and decision making related to the implementation of the Company's ESG and CSER programs.

The duties of the ESG Committee is to carry out evaluations and provide recommendations to the President Director regarding ESG, among others:

1. Decisions on the Bank's strategy that has an impact on the environment, social and governance in the ESG program and roadmap.
2. Monitoring the implementation of the Bank's ESG strategy and roadmap.
3. Provide information to the Company's management regarding ESG-related issues including legislation, government programs, international developments, future business trends and climate change.
4. Monitor, evaluate and provide recommendations on the results of ESG reports, concerned investors or other third parties regarding ESG implementation.

Membership Structure

The ESG Committee is regulated in Special Policy No. KK.9 - D concerning Governance Procedures The Board of Directors Committee has the following structure:

Structure	Position
Chairman (concurrently permanent member)	President director
Directors (concurrently permanent member)	Vice President Director *) Director in charge of Risk Management **) Director in charge of Human Capital, Compliance & Legal Director in charge of Asset Management Director in charge of Finance
Directors/SEVP	SEVP Wholesale Banking (Permanent Member) Other Directors/SEVPs according to the discussion material (Non-Permanent Members) SEVP in charge of Compliance and Legal (Non-Permanent Member)

*) Substitute Chairman I
**) Substitute Chairman II

General Conditions of Social and Environmental Responsibility Implementation

The Social and Environmental Responsibility (CSER) is a program mandated by the Government to State-Owned Enterprises. CSER is motivated by environmental and social problems arose as a result of rapid development for economic growth. Thus, the role of financial institutions is needed in supporting sustainable development without damaging the environment and society. CSER is seen as a tangible manifestation of the Company's contribution to the efforts in achieving the Sustainable Development Goals, by providing economic, social, environmental and legal and governance benefits with more integrated, targeted, measurable and accountable principles. For the Company, CSER gives a strategic direction in developing financing portfolio for sustainable business activities as well as changes that will be made by the Company in business processes and risk management. The changes achieved are relevant in the context of integrating Environmental, Social, Governance (ESG) risk management in the Company's business activities.

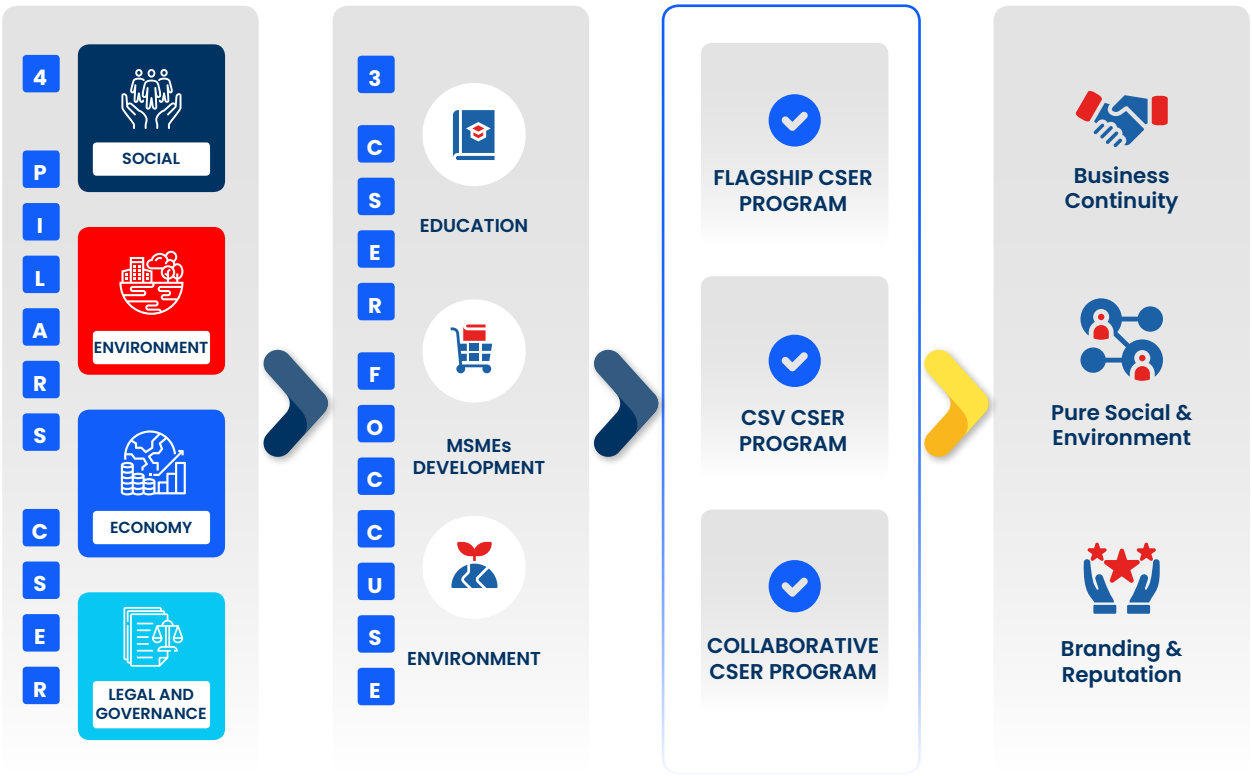
In 2024, Company has accomplished some CSER agendas following the 4 (four) CSER Pillars namely Social, Economy, Environment and Law and Governance and 3 (three) main focus, namely Education, Environment and MSMEs Development. The combination of the four CSER Pillars and three CSER focuses, Bank BTN classifies the agendas into:

1. Flagship CSER Program.
2. Creating Shared Value (CSV) CSER Program.
3. Collaborative CSER Program.

The three programs aim to maintain business continuity, pure social and environment, branding and reputation.

The Company understands that the substance of the CSER program does not only lead to efforts to build harmonious and mutually beneficial relationships with the environment, community and stakeholders—both locally, nationally and globally—but also leads to the Company's mission to have a positive impact and contribution to sustainable economic development.

CSER Pillars, Focuses, Programs and Benefits Roadmap



The Company is committed to fulfilling this responsibility

by constantly running a sound business as well as improving programs and activities related to CSER. Various activities carried out simultaneously reflect the Company's contribution to sustainable development goals whose implementation is based on the principles of the ISO 26000 standard. Thus, the CSER program carried out by the Company is expected to provide benefits for social and environmental development, contribute to added value creation for the Company and foster the community's micro and small businesses to be more resilient and independent.



The implementation of the CSER program is oriented to achieving Sustainable Development Goals (SGDs) and is guided by ISO 26000, with the hope that the implementation of CSER at SOEs is more measurable, impactful and sustainable. The Company's CSER program aims to:

1. Provide benefits for economic, social, environmental and legal and governance development for the Company;
2. Contribute to the creation of added value for the Company in integrated, directed, measurable and accountable manners;
3. Foster micro and small businesses and the surrounding communities to be more resilient and independent.

Furthermore, the Company has also set strategic objectives that are beneficial, sustainable and supporting the streamlined operation of the Company. This goal setting is also based on the concept of People, Planet and Profit Balance.

The Company continues to be committed to encouraging sustainable finance through the integration of Environmental, Social and Governance (ESG) aspects in its operational activities. The Company's journey in the ESG realm involves planning how the Company manages environmental impacts, addresses social issues, and maintains ethical governance standards in all of its banking operations. The Company's implementation of sustainable finance has been carried out since 2019 through the publication of the Sustainable Finance Action Plan (RAKB) which refers to OJK Regulation No. 51 of 2017 concerning Sustainable Financing of Financial Services Institutions, Issuers and Public Companies.

The Company as a State-Owned Enterprise (BUMN) and one of the largest banks in Indonesia is committed to supporting the realization of sustainable development. This is realized by the Company by providing selective financing, which is in line with the principles of sustainable finance and the implementation of a sustainable Social and Environmental Responsibility Program (CSER).

CSER programs that support Sustainable Finance include:

No.	Program Name	Program Implementation Work Unit
1.	Development of public facilities and infrastructure in the form of green parks, play areas, and Educational Play Tools (APE) in BTN Housing	Corporate Secretary
2.	Implementation of socialization and waste sorting in the BTN Housing environment	Corporate Secretary
3.	Rehabilitation of uninhabitable houses and healthy houses	Corporate Secretary
4.	Construction of clean water facilities, washing, bathing, toilets (MCK) and healthy sanitation for the community	Corporate Secretary
5.	Implementation of tree planting in green open spaces (RTH) and public facilities	Corporate Secretary
6.	Training support for MSMEs to Go Digital	Corporate Secretary
7.	Training and provision of infrastructure to improve MSME empowerment activities	Corporate Secretary
8.	Training for millennials to become Young Developers at BTN	Corporate Secretary
9.	Development of community reading parks to eradicate illiteracy and improve reading and writing	Corporate Secretary
10.	Providing scholarships to high-achieving students from underprivileged families	Corporate Secretary
11.	Support and cooperation with partners for the development of BTN outlets as a learning facility	Corporate Secretary

Realization of Corporate Social and Environmental Responsibility (CSER) 2024

Through the CSER program, the Company aims to have a positive impact on human social life and the environment. The Company's CSER program is directed at empowering communities, improving the quality of life, and maintaining the sustainability of the surrounding ecosystem. CSER is one of the important pillars that encourages the Company to innovate and develop together with society. Therefore, the Company continues to realize its strategic role in supporting sustainable development and creating positive value for all stakeholders.

In 2024, BTN received the following awards:

Media/Institution	Award	Date
BUMN Track	4th CSER & CSR Award 2024 1. Social Pillar (Gold) 2. Economic Pillar (Gold) 3. Environmental Pillar (Platinum)	July 30, 2024
TopBusiness	1. TOP CSR Awards 2024 on # Stars 5 2. TOP Leader on CSR Commitment 2024 (Nixon L.P. Napitupulu – President Director)	May 30, 2024

Highlights Of CSER Activities In 2024

1 Social Pillar

Growing together with the community is one of the Company's main goals which is pursued through holding a series of activities that contribute to improving the quality of social, cultural, religious and social welfare life. This effort is in accordance with the achievements of SDGs 1, 2, 3, 4 and 5.







BTN Holds BTN Ramadhan Safari Event

BTN President Director, Nixon L.P. Napitupulu together with the Board of Directors and BTNers provided social assistance at the BTN Safari Ramadan event in April 2024. During this Ramadan year, Company symbolically demonstrated its concern for the community spread across various regions including Bandung, Makassar, Palu, Surabaya, Jakarta, Serang, Bengkulu. The social assistance provided was in the form of compensation and support for public facilities and infrastructure.



BTN Supports Housing Environmental Education Facilities

BTN President Director, Nixon L.P. Napitupulu together with the BTN Management Team aided in the form of educational facilities and infrastructure in the form of children's play facilities in the housing complex in the Cileungsi - Bogor area in conjunction with the BTN mortgage and Micro Business Loan Mass Contract event in July 2024.

2 Economic Pillar

In order to achieve quality and sustainable social economic growth, the Company carries out activities to increase employment and business opportunities. These various activities are expected to grow income and reduce poverty levels in society in accordance with SDGs 7, 8, 9, 10, and 17.



BTN Housingpreneur

In 2024, Company will implement a program initiative designed to support the creation of a sustainable business system related to the housing ecosystem in the form of a series of competitions and entrepreneurial training under the name of the BTN Housingpreneur program. The series of activities will be carried out through roadshows in 3 (three) cities, namely Yogyakarta, Bandung, and Jakarta. Furthermore, the selection and awarding process will be carried out in early 2025.



Volunteer Service Activities

Through BUMN volunteer service activities, Company provides support to MSMEs in Magepanda Village, Maumere, Sikka Regency, East Nusa Tenggara to empower MSMEs, especially Maumere's traditional woven fabrics.

3 Environmental Pillar

Environmental preservation is a priority for the Company. Therefore, the Company carries out natural resource and environmental management activities which also aim to increase environmental awareness in society. This effort indirectly supports the achievement of SDGs 6, 11, 12, 13, 14, and 15.



Coastal Area Conservation in Environmental Conservation Efforts

To address environmental issues, Company collaborates with stakeholders such as: PPATK, BI, OJK, Local Government, Communities in the Bali province area to plant mangroves, release turtles and provide environmental education. The activities were carried out in the Tanjung Benoa area, Badung - Bali. The total planting of mangrove trees was 3,000 trees and the release of a total of 1,000 hatchlings.

Company's TJSL budget in 2024 was allocated at IDR 88.98 billion with achievements up to December 2024 of IDR 88.96 billion or 100%.

No.	Field of Activity	Work Budget Plan per Sector 2024 (IDR)	Realization 2024 (IDR)	%
A	SOCIAL PILAR			
1	SDG 1 (No Poverty)	8,000,000,000	11,045,972,420	138.1
2	SDG 2 (Without Hunger)	15,000,000,000	21,159,374,300	141.1
3	SDG 3 (Healthy and Prosperous Life)	12,000,000,000	14,845,051,673	123.7
4	SDG 4 (Quality Education)	10,000,000,000	8,645,104,300	86.5
5	SDG 5 (Gender Equality)	285,000,000	220,000,000	77.2
B	ECONOMIC PILAR			
1	SDG 7 (Clean and Affordable Energy)	1,000,000,000	1,205,465,000	120.5
2	SDG 8 (Decent Work and Economic Growth)	6,000,000,000	5,278,260,444	88.0
3	SDG 9 (Industry, Innovation and Infrastructure)	7,500,000,000	6,236,867,228	83.2
4	SDG 10 (Reducing the Gap)	5,000,000,000	1,445,294,797	28.9
5	SDG 17 (Partnership To Achieve Goals)	1,200,000,000	495,017,300	41.3
C	ENVIRONMENT PILAR			
1	SDG 6 (Clean Water and Adequate Sanitation)	2,000,000,000	95,000,000	4.8
2	SDG 11 (Sustainable Cities and Settlements)	12,000,000,000	14,900,539,959	124.2
3	SDG 12 (Responsible Consumption and Production)	500,000,000	1,079,576,859	215.9
4	SDG 13 (Addressing Climate Change)	2,300,000,000	295,078,954	12.8
5	SDG 14 (Ocean Ecosystem)	2,000,000,000	375,120,000	18.8
6	SDG 15 (Terrestrial Ecosystem)	3,000,000,000	1,592,977,380	53.1
D	LAW AND GOVERNANCE PILARS			
1	SDG 16 (Peace, Justice and Strong Institutions)	1,200,000,000	50,000,000	4.2
TOTAL		88,985,000,000	88,964,700,614	100.00

Realization of CSER In Accordance with 3 (Three) CSER Focuses

1 Education Focus

It is hoped that CSER Company will encourage or provide positive things, such as a scholarship program for young Indonesians so that they can get convenience and access to science and technology. Company encourages, upgrades, or provides positive things in the field of education, such as scholarships for underprivileged and high-achieving children, educational infrastructure, study room facilities and rehabilitation of teaching and learning buildings.






Photos of TJSL Education Sector in 2024

2 MSME Focus

Company Social and Environmental Responsibility (CSER) is directed to establish micro, small and medium entrepreneurs in all areas through the provision of funding and empowerment of MSMEs. SOEs is expected to stimulate the establishment of micro, small and medium enterprise (MSMEs) and provide funding for the emerging micro, small and medium enterprises (MSMEs).

In achieving quality and sustainable economic growth, the Company carries out activities to increase employment and business opportunities. These various activities are expected to grow income and reduce poverty levels in society in accordance with the Sustainable Development Goals.






Photos of TJSL UMKM Sector in 2024

3 Environmental Focus

CSER of SOEs was directed to preserve the nature sustainability by synergizing between the environment, people income and climate change. One of the programs is by planting beneficial trees, not only for greening and oxygen supply, but also for people income and environmental conservation.

Environmental preservation is something the Company prioritizes. Therefore, the Company carries out natural resource and environmental management activities which also aim to increase environmental awareness in society. These efforts indirectly support the achievement of the Sustainable Development Goals.






Photos of TJSL Environmental Sector in 2024

CSER Program Concept Of Creating Shared Value (CSV)

1 Environmental Program

No.	Program Name	SDG	Location	Types of Assistance	Number of Beneficiaries
1.	Greening in Housing	SDG 15	Kep. Seribu, Bogor, Jakarta, Wonosobo, Semarang, Balikpapan, Pare-pare, Bengkulu, Tangerang, Karawaci, Palembang, Semarang, Cibinong, Magelang, Padang, Malang, Tajung Pinang, Pangkal Pinang, Medan, Banyuwangi, Denpasar,	Provision of tree seedlings in housing financed by BTN	Planting 29,615 trees



One House One Tree Program in Karawaci area



One House One Tree Program in Bogor area

Description of the Impact Given to Beneficiaries

It is hoped that the tree seed assistance provided can increase the green areas in housing estates, making housing more beautiful and a more comfortable place to live.

Benefits for companies

a. If a housing becomes a comfortable residence, then it is expected that the quality of housing in a residence will increase and ultimately increase the submission of mortrage to BTN and the return of loan by the developer according to the plan.
b. As an effort to reduce carbon emissions and reduce air pollution.

2 BTN Education Program

No.	Program Name	SDG	Location	Types of Assistance	Jumlah Penerima Manfaat
1.	*Young Developer Training*	TPB 4	Pekanbaru and Surabaya.	Providing training and introduction regarding property to students and the public.	400 participants


Young Developer Training Program in Surabaya


Developer Training Program in Pekanbaru

Information on the impact provided to Beneficiaries
Participants consisting of novice property entrepreneurs (developers) and students gain knowledge about the property industry, which is expected to be applied in the world of work or the students can be developers if they want to become entrepreneurs.

Company with its core business of housing financing (KPR) has a social responsibility, especially in providing literacy to the community regarding property. One of the targets of literacy related to property is millennials. With literacy, it is hoped that they will be interested in working in the property world and are expected to become young developers as BTN's future market in accordance with BTN's housing financing business.

Benefits for companies
a. Introducing Company as a bank that focuses on housing to the community or as a literacy program.
b. It is hoped that these participants, if they work in the property world, can work together with Company in assisting the Government in fulfilling the housing backlog to the community.

> In this activity, Company also collaborated with various stakeholders. Among them are housing associations in this case the Indonesian Real Estate Company Association (REI) as Company's strategic partner. Company and REI together provided materials to participants: students from campuses that are also BTN partners and novice developers.

This developer training program for millennials aims to provide students with supplies to prepare themselves to become young developers who can later help the government in reducing the housing backlog in Indonesia. In addition, it is also to strengthen Bank Company's brand awareness as the bank that is most concerned about housing issues in Indonesia.

2022

The Millennial Developer Program Design is an Education Initiative Program to form Young Developers. The activity locations are in Manado, Jember, Cirebon and Purwakarta in collaboration with Company Stakeholders in this case the Indonesian Real Estate (REI).

2023

Development of Millennial Developer Design with many requests from Company Stakeholders (REI) to be implemented in several locations with a larger number.

2024

The Young Developer Training Program is included in the ESG Champion Initiative Program through the TJSL Education Program and becomes a BTN Sustainable Program. Furthermore, alumni of this training are invited to participate in BTN's first housing ecosystem entrepreneurship competition program, namely BTN Housingpreneur.

No.	Program Name	SDG	Location	Types of Assistance	Number of Beneficiaries
2.	**Taman Bacaan**	SDG 4	Tangerang Selatan, Bekasi, Karawang, Semarang, Klaten, Yogyakarta, Banyumas, Kediri.	Company collaborates with Balai Pustaka to provide support for the creation and revitalization of reading parks for students in Indonesia.	9 elementary schools



Revitalization program for reading parks in the South Tangerang area



Revitalization program for reading parks in the Semarang area

Information on the impact provided to Beneficiaries

a. Quality education to ensure inclusive and equitable quality education and increase lifelong learning opportunities for all.
b. TJSL Reading Garden activities as a form of financial inclusion support for school students.

Benefits for companies

Company collaborates with Balai Pustaka as BTN's partner for the implementation of support for the revitalization of the reading park room. The activity is a form of support for financial inclusion through the BTN TJSL Program.

3 MSME Empowerment Program

No.	Program Name	SDG	Location	Types of Assistance	Number of Beneficiaries
1.	**UMKM Go Digital**	SDG 8	Jember	Company supports business group infrastructure.	15 MSME





Company together with the Jember Regency Government supports the efforts of UMKM Go Digital. Company's support for 15 UMKM Go Digital in the framework of Safari Ramadhan 2024

Information on the impact provided to Beneficiaries

a. Facilitating MSMEs through assistance in using banking services and providing booths to BTN-assisted MSMEs, MSME showcases and exhibitions in order to improve skills and sales.
b. Encouraging MSMEs to Go Digital to be able to adapt to developments in consumer behavior.

Benefits for companies

Company supports MSME business actors to increase sales by utilizing digital and BTN service products which will ultimately affect BTN business products and improve the MSME economy.

BTN'S Outstanding TJSL Program

No.	Program Name	SDG	Location	Types of Assistance	Number of Beneficiaries
1.	**Bank Mini**	SDG 4	Sidoarjo, Penajem Paser Utara, Yogyakarta, Pangkal Pinang, Tanjung Pinang, Pekanbaru, Gorontalo, Surabaya, Bandung, Kalimantan Selatan, Denpasar, Banyuwangi, Gresik	Company collaborates with BTN Partner Vocational Schools for Assistance Support in the form of outlet replicas. Construction of Mini Banks as a form of support for Financial Inclusion through the BTN TJSL Program.	16 BTN Partner Schools

Bank Mini in Tanjung Pinang area



Bank Mini in Pangkal Pinang area



The program is called Bank Mini, which aims to improve financial literacy in schools. During 2024, this program has been implemented in more than 15 schools, continuing 30 schools in the previous year. The Bank Mini program has contributed to the education sector with a very helpful impact on the learning and teaching process of students through direct practice which was previously focused only on theory.

Information on the impact provided for Beneficiaries

a. Quality Education to ensure inclusive and equitable quality education and increase lifelong learning opportunities for all.

b. CSER Bank Mini activities are a form of support for Financial Inclusion and encourage school students to be able to understand the flow of activities at the Bank.

Benefits for the Company

Company collaborates with Vocational and General Schools which are BTN Partners for Assistance in the form of outlet replicas. Construction of Mini Bank as a form of Financial Inclusion Support through the BTN CSER Program and also as a form of Financial Inclusion.

Through regulations issued by OJK Regulation No. 76/POJK.07/2016 of 2016, financial inclusion is the availability of access to various formal financial institutions, products and services in accordance with community needs and capabilities in order to improve community welfare.

The Company continues to strive to increase public knowledge about finance. This effort aims to anticipate less effective financial management by individuals and groups due to a lack of knowledge about finance. Ineffective financial management has the potential to lead to inappropriate use of products and services, especially for people in remote areas with low economic conditions and difficult access to financial resources.

Against this background, the Company seeks to provide education to this group to increase customer financial knowledge. Increasing customers' ability to use products and services through Bank Mini BTN.

Apart from Financial Inclusion through the BTN Social and Environmental Responsibility (CSER) Program, it is also implemented through the Customer Care Division for the Financial Inclusion and Financial Literacy programs.

No.	Program Name	SDG	Location	Types of Assistance	Number of Beneficiaries
2.	**Uninhabitable House**	SDG 3	Tapanuli Tengah, Jawa Barat	Company supports the Acceleration of the Eradication of Extreme Poverty by providing home repair assistance for extremely poor families.	35 units

Provision of Assistance for Renovating Uninhabitable Houses in Collaboration with the Central Tapanuli Regency Government





Information on the impact provided to Beneficiaries

a. Construction of houses that meet building safety requirements, minimum building area adequacy, and occupant health.
b. Acceleration of the Eradication of Extreme Poverty through Improving the Quality of Houses.
c. Healthy and Prosperous Life in ensuring a healthy life and improving the welfare of the entire population.

Benefits for companies

Company supports the Acceleration of Extreme Poverty Eradication through the Construction of houses that meet building safety requirements, minimum building area adequacy, and occupant health.

CID Program Details Based on CSER Focus

No.	Field	Realization (IDR)	Activity Categories	Distribution of Aid Areas
1.	**Environment**	12,397,865,592	- Greening of BTN Housing Environment - Tree Seedling Planting - Mangrove Planting - Sanitation Facilities and Infrastructure - Public Facilities and Infrastructure	The Company's TJSL assistance has been carried out evenly throughout the work areas starting from DKI Jakarta, Cibubur, Bekasi, Ciputat, Tangerang, Karawaci, Cilegon, Tasikmalaya, Karawang, Cirebon, Tegal, Solo, Magelang, Yogyakarta, Kudus, Jember, Kediri, Mulyosari, Sidoarjo, Surabaya, Bangkalan, Malang, Jambi, Tanjung Pinang, Pangkal Pinang, Palembang, Bengkulu, Padang, Bandar Lampung, Pematang Siantar, Balikpapan, Denpasar, Mataram, Makassar, Ambon

No.	Field	Realization (IDR)	Activity Categories	Distribution of Aid Areas
2.	**Education**	10,504,767,900	- Assistance for the Development of Educational Institutions - Assistance for Educational Facilities and Infrastructure - Assistance for BTN Partner Universities - Assistance for the Development of Islamic Boarding Schools and Madrasahs - Assistance for Facilities and Infrastructure for Islamic Boarding Schools and Madrasahs - Scholarship Assistance - Assistance for Public School Facilities - Assistance for Community Reading Parks - Young Developer Training	The Company's TJSL assistance has been carried out evenly throughout the working areas starting from DKI Jakarta, Ciputat, Bogor, Cikarang, Cibubur, Depok, Tangerang, Karawaci, Tasikmalaya, Bandung, Purwakarta, Purwokerto, Pekalongan, Solo, Kediri, Magelang, Kudus, Tegal, Semarang, Surabaya, Banyuwangi, Bangkalan, Gresik, Malang, Denpasar, Pekanbaru, Purwakarta, Pangkal Pinang, Tanjung Pinang, Bandar Lampung, Palembang, Jambi, Padang, Medan, Batam, Mataram, Panakukkang, Pontianak, Banjarmasin, Makassar, Ternate.
3.	**Empowerment of MSMEs**	5,763,502,093	- MSME Training - MSME Halal Certification Assistance - NIB Assistance - Farmer Group Assistance - Group Business Facility Assistance including Fishermen - MSME Facilities and Infrastructure Assistance	The Company's TJSL assistance has been carried out evenly throughout the working areas starting from DKI Jakarta, Surakarta, Jember, Tulungagung, Sidoarjo, Kediri, Yogyakarta, Pekanbaru, North Kalimantan, Pare Pare, South Sulawesi, and Jayapura.

Performance of the MSE Funding Program in 2024

Provisions Micro & Small Business Funding Program (MSE)

- SOE Minister's Letter No. S-721/MBU/11/2022 concerning Cooperation in Micro and Small Business Funding Programs ("MSE Program Cooperation").
- Minister of State-Owned Enterprises Regulation No. PER-1/MBU/03/2023 amendments to Minister of State-Owned Enterprises Regulation No. PER- 06/MBU/09/2022 concerning Special Assignments and Social and Environmental Responsibility Programs for State-Owned Enterprises.
- Minister of State-Owned Enterprises Regulation No. SK-277/MBU/10/2023 concerning Implementation Guidelines for Settlement of Problematic Sharia Receivables and/or Financing in Micro and Small Business Funding Programs in BUMN.
- Technical Instructions I-XIV.1 concerning Work Flow for Micro and Small Business Funding Programs.
- Special Policy I-XIV concerning Micro and Small Business Funding Program Products.
- BTN Cooperation Agreement No. 03/PKS/SMBD/X/2023 with BRI No. B.34/MBD/10/2023 dated October 13, 2023 concerning Implementation of the Micro and Small Business Funding Program.
- BTN Minutes No. 01/BA/SMBD/X/2023 with BRI No. B.751-MBD/10/2023 dated October 18, 2023 concerning Deposit of Funds for the Micro and Small Business Funding Program.
- Minutes of BTN No. 01/BA/SMBD/VI/2024 with BRI No. B.428-MBD/06/2024 dated June 24, 2024 concerning Deposit of Funds for Micro and Small Business Funding Program Phase 2.

Source of Funds for the PUMK Program

- Principal funds for repayment of loans from Foster Partners.
- Balance of allocated PUMK Program funds until the end of the year.
- Loan administration services/sale and purchase margin/ profit sharing portion, deposit interest and/or current account services from PUMK Program funds.

PUMK Cash Flow 2024

No.	Description	Work Plan 2023	Realization 2023	(%)	Work Plan 2024	Realization 2024	(%)
FUNDS AVAILABLE		1	2	(2 : 1)	3	4	(4 : 3)
1	Initial Balance	11,732,472,238	11,732,472,238	100%	10,970,559,980	**10,970,559,980**	100%
2	Loan Repayment of Fostered Partners	15,000,000,000	15,264,329,788	102%	10,000,000,000	**8,501,789,249**	85%
3	Refund from BUMN Distributor	-	-	-	-	**-**	-
4	PUMK Admin Service Income	1,100,000,000	1,132,613,855	103%	500,000,000	**1,450,172,764**	290%
5	Bank Service Income	-	-	-	-	**-**	
6	Other Income (Expenses)	-	2,744,099	-	-	**113.765.071**	-
Total Funds Available		**27,832,472,238**	**28,132,159,980**	**305%**	**21,470,559,980**	**21,036,287,064**	**475%**
FUNDS DISBURSED							
7	Independent Distribution of PUMK	-	9,161,600,000	-	-	**-**	-
8	Collaborative Distribution of PUMK	-	-	-	-	**-**	-
9	Special Distribution of PUMK	-	-	-	-	**-**	-
10	PUMK distribution through BRI	8,000,000,000	8,000,000,000	100%	10,000,000,000	**10,000,000,000**	100%
Total Funds Disbursed		**8,000,000,000**	**17,161,600,000**	**100%**	**10,000,000,000**	**10,000,000,000**	**100%**
Final Balance		**19,832,472,238**	**10,970,559,980**	**205%**	**11,470,559,980**	**11,036,287,064**	**375%**

*Other income (expenses) attached are included in the Fines upon settlement *unaudited

Distribution of PUMK Program 2024

	2023	2024
TARGET	IDR18 billion	IDR10 billion
REALIZATION	IDR17.21 billion	IDR14.8 billion
ATTAINMENT	95.62%	148.5%

In connection with the Letter of the Minister of SOEs No. S-721/MBU/11/2022 dated November 10, 2022 concerning the Cooperation Program for Micro and Small Business Funding ("PUMK Program Cooperation"), on October 13, 2023, a Cooperation/Collaboration Agreement was signed with PT Bank Rakyat Indonesia (Persero) Tbk. Thus, the independent distribution of the PUMK Program has been stopped until the maturity of the cooperation.

Distribution Composition Based on Sector

No.	Business Sector	Realization of PUMK Cooperation Scheme Through BRI Based on Business Sector			
		Year 2023		Year 2024	
		Number of MB	Nominal (IDR)	Number of MB	Nominal (Rp)
1.	Industrial Sector	1	25,000,000	20	601,000,000
2.	Service Sector	8	281,000,000	81	2,347,000,000
3.	Trade Sector	11	405,000,000	205	6,014,000,000
4.	Agricultural Sector	1	30,000,000	4	45,000,000
5.	Livestock Sector	0	-	11	226.000.000
6.	Other	2	45.000.000	172	5.426.800.000
7.	Fishery	0	-	5	190.000.000
Total		**23**	**786.000.000**	**498**	**14.849.800.000**

Distribution Composition Based on Area

No.	Region	Realization of PUMK Cooperation Scheme Through BRI Based on Region			
		Year 2023		Year 2024	
		Number of MB	Nominal (IDR)	Number of MB	Nominal (IDR)
1.	Bali	-	-	15	410,000,000
2.	West Java	-	-	115	2,935,300,000
3.	Central Java	-	-	63	1,760,500,000
4.	East Java	4	100,000,000	52	1,517,000,000
5.	West Kalimantan	2	60,000,000	10	480,000,000
6.	South Sulawesi	14	476,000,000	96	2,170,000,000
7.	Central Sulawesi	-	-	115	4,566,000,000
8.	Yogyakarta	3	150,000,000	25	781,000,000
9.	North Sulawesi	-	-	7	230,000,000
Total		**23**	**786,000,000**	**498**	**14,849,800,000**

Number of Fostered Partners and Details of Receivables until December 31, 2024

The total number of existing fostered partners of the PUMK Program in 2024 is 6,967 Debtors and the total number of fostered partners of the cooperation scheme with PT Bank Rakyat Indonesia (Persero) Tbk in 2024 is 521 Debtors.

	Year 2023		Year 2024		Quality of Cooperation Scheme with BRI in 2023		Quality of Cooperation Scheme with BRI in 2024	
	Total (IDR)	(%)	Total (IDR)	(%)	Total (IDR)	(%)	Total (IDR)	(%)
Fluent	3,452,460,063	7.00	388,990,786	0.95	786,000,000	100	13,520,127,798	98.61
Special Mention	7,303,272,049	14.81	1,633,765,518	4.00	-	-	176,209,886	1.29
Doubtful	4,950,359,453	10.04	3,483,833,821	8.53	-	-	14,601,300	0.11
Lost	33,616,019,533	68.16	35,313,732,625	86.51	-	-	-	-
Total	**49,322,111,098**	**100**	40,820,322,750	100	**786,000,000**	**100**	13,710,938,984	100

* The installment pattern on BRI distribution is adjusted to the cash flow of the fostered partner's business so that there are 2 (two) types of patterns, namely monthly installment patterns and one-off installments.

Distribution of PUMK Program in 2024

The amount of PUMK Program Distribution in 2024 is IDR 14.8 billion.

1. Growing a portfolio of principal and interest returns to increase the amount of funds that can be distributed
2. Accompanying and increasing awareness of fostered partner businesses by participating in national & international events.
3. Providing distribution of PUMK Program through Cooperation/Collaboration with PT Bank Rakyat Indonesia (Persero) Tbk

Development of PUMK Program Partners

The implementation of coaching is carried out by means of quarterly visits (OTS) to the Fostered Partners by the BTN Branch Office of the Fostered Partner. The monitoring and evaluation process of each Fostered Partner's business is important so that the business process can run sustainably.

Ternak Bebek





Name	: Satrio
Region	: Medan
Realization	: November 3, 2021
Ceiling	: IDR100,000,000
Tenor	: 3 Years
Collectibility	: Fluent

Bengkel Las





Name	: Ismail Gafari
Region	: Palangka Raya
Realization	: September 27, 2022
Ceiling	: IDR50,000,000
Tenor	: 3 Years
Collectibility	: Fluent

OJK INDEX

OJK Index

Criteria	Explanation	Page	Regulations
UMUM			
Annual Report is well printed and bound.	The Annual Report is well printed and bound.	✓	POJK 29
Annual Report must be reproduced in the form of printed copies of documents and electronic copies of documents.		✓	POJK 29
Annual Reports are presented in Indonesian and foreign languages		✓	POJK 29
Annual Report must be published on the Issuer's or Public Company's Website on the same date as the submission of the Annual Report to the Financial Services Authority.		✓	POJK 29
KILAS KINERJA			
Summary of important financial data contains financial information presented in comparative form for 3 (three) financial years or since starting their business if the Issuer or Public Company has been running its business activities for less than 3 (three) years.	Information includes, among others:		
	1. Sales revenue.	21	SEOJK 16
	2. Gross profit.	21	
	3. Operational profit.	22	SEOJK 9
	4. Profit before tax.	22	
	5. Net profit.	22	
	6. Profit and loss.	22	SEOJK 16
	7. Total comprehensive profit (loss).	22	SEOJK 9
	8. Total profit (loss) attributable to owners of the parent entity and non-controlling interests.	N/A	SEOJK 16
	9. Total comprehensive profit (loss).	22	SEOJK 16
	10. Total comprehensive profit (loss) attributable to owners of the parent entity and non-controlling interests.	N/A	
	11. Earnings (loss) per share.	23	SEOJK 9 SEOJK 16
	12. Total assets.	19	
	13. Total liabilities.	20	
	14. Total equity.	21	
	15. Third-party funds.	19	SEOJK 9
	16. Loans received.	20	
	17. Ratio of profit (loss) to total assets.	25	SEOJK 16
	18. Profit (loss) to equity ratio.	25	
	19. Profit (loss) to revenue/sales ratio.	25	
	20. Current ratio.	25	
	21. Liability to equity ratio.	25	
	22. Ratio of liabilities to total assets.	25	

Criteria	Explanation	Page	Regulations
	23. CAR ratio.	25	SEOJK 9
	24. Productive assets.	25	
	25. Non-performing loans (NPL) ratio.	25	
	26. Ratio of Operating Expenses to Operating Income (BOPO).	25	
	27. *Cost to Income Ratio(CIR).*	25	
	28. Net Interest Margin (NIM) ratio.	25	
	29. Percentage of violations and exceedances of the Legal Lending Limit (BMPK).	25	
	30. Statutory Reserve Ratio (GWM).	25	
	31. Net Open Position (NOP) Ratio.	25	
	32. Information and other financial ratios that are relevant to the issuer or public company and the type of industry.	25	SEOJK 9 SEOJK 16
Stock Information	Information on shares for Public Companies at least contains:		SEOJK 16
	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.	26	
	b. Market capitalization is based on the price on the stock exchange where the shares are listed.		
	c. The highest, lowest and closing share prices are based on the price on the stock exchange where the shares are listed.		
	d. Volumetrading 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. Information is presented in the form of graphs and tables.		
	2. such as a stock split, reverse stock, stock dividends, bonus shares, changes in the nominal value of shares, issuance of convertible securities, and additions and capital reduction, share information as referred to in number 1) is added with an explanation of at least:	29	SEOJK 16
	a. The date of implementation of the corporate action.		
	b. Stock split ratios, reverse stock ratios, stock dividends, shares. c. bonus, number of convertible securities issued, and changes in share nominal value.		
	d. The number of outstanding shares before and after the corporate action.		
	e. The number of effect conversions implemented (if any).		
	f. Stock prices before and after corporate actions.		

Criteria	Explanation	Page	Regulations
	3. In the event of a temporary suspension of share trading (suspension) and/or delisting of shares during the financial year, the reasons for the temporary suspension of share trading (suspension) and/or delisting of shares (delisting) shall be explained.	29	SEOJK 16
	4. In the event that the temporary suspension of share trading (suspension) as referred to in number 3) and/or the process of canceling the listing of shares (delisting) is still ongoing until the end of the Annual Report period, the actions taken to resolve the temporary suspension of share trading (suspension) and/or cancellation are explained. listing of shares (delisting).		SEOJK 16
REPORT OF DIRECTORS AND BOARD OF COMMISSIONERS			
Directors Report	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 (including for UUS if the Bank owns UUS)	54-55	SEOJK 9 SEOJK 16
	b. The role of the Board of Directors in formulating the strategy and strategic policies of the Issuer or Public Company.	54	SEOJK 16
	c. The process carried out by the Board of Directors to ensure the implementation of the Issuer's or Public Company's strategy.	54	
	d. Comparison between the results achieved and those targeted by the Issuer or Public Company.	55-56	SEOJK 9 SEOJK 16
	e. Obstacles faced by Issuers or Public Companies.	56	
	f. Organizational structure.	48	SEOJK 9
	g. Main activity.	46	
	h. Information Technology.	49	
	i. Types of products and services offered, including lending to debtors of micro, small and medium enterprises.	46-48	
	j. Interest rates for raising and providing funds.	50-53	
	k. Economic development and target market.	50	
	l. Networks and business partners at home and/or abroad.	48	
	m. Number, type and location of offices.	48	
	n. Ownership of the Board of Directors, Board of Commissioners and shareholders in the Bank's business group.	N/A	
	o. Important changes that occurred in the Bank and the Bank's business group in the year concerned.	N/A	
	p. Important things that are expected to happen in the future.	56-57	
	q. Human resources include the number, level of education, training, and development of human resources.	49	
	2. An overview of the business prospects of the Issuer or Public Company.	56-57	SEOJK 9 SEOJK 16
	3. Implementation of Issuer or Public Company governance.	57-59	

Criteria	Explanation	Page	Regulations
Report of the Board of Commissioners	The Board of Commissioners' report contains at least a brief description of:		
	1. Assessment of the Board of Directors' performance regarding the management of Issuers or Public Companies, including oversight by the Board of Commissioners in the formulation and implementation of the Issuer's or Public Company's strategy carried out by the Board of Directors.	64-67	SEOJK 16 SEOJK 9
	2. Views on the business prospects of Issuers or Public Companies compiled by the Board of Directors.	67	
	3. Views on the implementation of governance of the Issuer or Public Company.	68-71	
	4. Changes in the composition of the Board of Commissioners (if any) and reasons for the changes.	71-72	SEOJK 9
	5. Frequency and method of providing advice to members of the Board of Directors.	64	
Statement Letter from Members of the Board of Directors and Members of the Board of Commissioners	Statement Letter from Members of the Board of Directors and Members of the Board of Commissioners regarding Responsibility for the Annual Report. Statement letter from members of the Board of Directors and members of the Board of Commissioners regarding responsibility for the Annual Report is prepared in accordance with the format of Statement Letter from Members of the Board of Directors and Members of the Board of Commissioners regarding Responsibility for the Annual Report.	80-81	SEOJK 16 POJK 29
COMPANY PROFILE			
Company name and full address	Access to Issuers or Public Companies including branch offices or representative offices that enable the public to obtain information about Issuers or Public Companies, including:	84-85	SEOJK 9 SEOJK 16
	1. Address		
	2. Phone number		
	3. Email address		
	4. Website address		
Name and address office or representative office (if any)	Contains information including:		
	Name and address of the branch/representative office, including: a. Address b. Phone number c. Email address d. Website address	86-94	
	Notes: if the company does not have subsidiaries, branch offices, and representative offices, so that it is disclosed.		
Brief history of Issuer or Public Company	Include among others: date/year of establishment, name, change of company name (if any), and effective date of change of company name.	100-101	SEOJK 9 SEOJK 16
	Notes: if the company has never changed its name, please disclose it.		
Vision, Mission and Corporate Culture	Includes:		SEOJK 9 SEOJK 16
	1. Company Vision	102	
	2. Company Mission	103	
	3. Statement that the vision and mission have been reviewed and approved by the Board of Directors/Board of Commissioners in the financial year.	104	

Criteria	Explanation	Page	Regulations
Business activities	Description of, among others:		SEOJK 9 SEOJK 16
	1. The company's business activities according to the latest articles of association.	106	
	2. Business Activities Undertaken.	106	
	3. Products and/or services produced.	107-123	
Operational Area	Issuer's or Public Company's operational area. The operational area is the area or area where operational activities are carried out or the scope of the company's operational activities.	124-125	SEOJK 16
Organizational structure	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.	126-127	SEOJK 9 SEOJK 16
Association Membership	List of industry association memberships both on a national and international scale related to the implementation of sustainable finance.	128	SEOJK 16
Board of Directors Profile	Profile of the Board of Directors, at least contains:	129-139	SEOJK 9 SEOJK 16
	1. Name and position in accordance with the duties and responsibilities.		
	2. Latest photos.		
	3. Age.		
	4. Citizenship.		
	5. Educational history and/or certification.		
	6. Position history, including information on:		
	a. The legal basis for appointment as a member of the Board of Directors of the Issuer or Public Company concerned		
	b. Concurrent positions, both as members of the Board of Directors, members of the Board of Commissioners, and/or committee members as well as other positions both 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 is disclosed.		
	c. Work experience and time period both inside and outside the Issuer or Public Company.		
	7. of the Board of Commissioners, major shareholders and controllers, either directly or indirectly to individual owners, including names of affiliated parties. In the event that members of the Board of Directors have no affiliation, the Issuer or Public Company shall disclose this. Financial relationships and family relationships of members of the Board of Directors and members of the Board of Commissioners with other members of the Board of Directors, other members of the Board of Commissioners, and/or controlling shareholders of the Bank.	140	SEOJK 9 SEOJK 16 POJK 13
	8. 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 will be disclosed.	140-143	SEOJK 16

Criteria	Explanation	Page	Regulations
Profile of the Board of Commissioners	Profile of the Board of Commissioners, at least contains	144-153	SEOJK 9 SEOJK 16
	1. Name and position.		
	2. Latest photos.		
	3. Age.		
	4. Citizenship.		
	5. Educational history and/or certification.		
	6. Position history, including information on:		
	a. The legal basis for appointment as a member of the Board of Directors of the Issuer or Public Company concerned		
	b. Legal basis for the first appointment as a member of the Board of Commissioners who is an independent commissioner of the Issuer or Public Company concerned.		
	c. Concurrent positions, both as members of the Board of Directors, members of the Board of Commissioners, and/or committee members as well as other positions both 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 is disclosed.		
	d. Work experience and time period both inside and outside the Issuer or Public Company.		
	7. Affiliation with other members of the Board of Directors, members of the Board of Commissioners, major shareholders and controllers, either directly or indirectly to individual owners, including names of affiliated parties. In the event that members of the Board of Directors have no affiliation, the Issuer or Public Company shall disclose this. Financial relationships and family relationships of members of the Board of Directors and members of the Board of Commissioners with other members of the Board of Directors, other members of the Board of Commissioners, and/or controlling shareholders of the Bank.	154	SEOJK 9 SEOJK 13 SEOJK 16 POJK 17
	8. Statement of independence of the independent commissioner in the event that the independent commissioner has served more than 2 (two) terms.	N/A	SEOJK 16
	9. 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 will be disclosed.	155-56	
Executive officer brief profile	Including the composition of executive officers along with their positions and a summary of Curriculum Vitae.	161-182	SEOJK 9
Number of employees and employee competency development data.	Data on employee competency development that has been carried out in the financial year consisting of parties (position levels) who attended training, types of training, and training objectives as well as equal opportunities for all employees.	182-184	SEOJK 9 SEOJK 16
	Employee competency development costs that have been incurred in the financial year.		

Criteria	Explanation	Page	Regulations
Shareholder composition	Names of shareholders and percentage of ownership at the beginning and end of the financial year, which consists of information regarding:		SEOJK 9 SEOJK 16 POJK 17
	1. Shareholders who own 5% (five percent) or more shares of Issuers or Public Companies.	187	
	2. 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, then this matter shall be disclosedthe.	188-189	
	3. 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 register of shareholders for the benefit of indirect ownership by members of the Board of Directors and members of the Board of Commissioners. 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 the shares of the Issuer or Public Company, then this matter must be disclosed. Directors and commissioners who own Shares (Directors and Board of Commissioners/Supervisory Board must report to the company regarding their and/or family's share ownership in the company concerned and other companies, including any changes thereto).	188-189	
	4. 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.	187-188	SEOJK 16
	5. Number of shareholders and percentage of ownership at the end of the financial year based on classification:	190	SEOJK 16
	a. Ownership of local institutions.		
	b. Ownership of foreign institutions.		
	c. Local individual ownership.		
	d. Foreign individual ownership.		
	The above information can be presented in tabular form.		
Major and controlling shareholder	Information regarding major shareholders and controllers of Issuers or Public Companies, either directly or indirectly, up to individual owners, presented in the form of a schematic or chart.	190	SEOJK 9 SEOJK 16
List of associate subsidiaries, venture companies	Names of subsidiaries, associated companies, joint venture companies where the Issuer or Public Company has joint control of the entity (if any), along with the percentage of share ownership, line of business, total assets, and operating status of subsidiaries, associated companies, joint venture companies. For subsidiaries, information regarding the address of the subsidiary is added.	191	SEOJK 9 SEOJK 16
Information related to the Bank Business Group	Banks that are part of a business group and/or have Subsidiaries, must add:	191	SEOJK 9
	The structure of the Bank's business group which includes:		
	a. The structure of the Bank's business group consists of the Bank, Subsidiaries, sister companies, Parent Entity up to the ultimate shareholder.		
	b. Management linkage structure within the Bank's business group.		
	c. Shareholders acting on behalf of other shareholders. The definition of a shareholder acting on behalf of another shareholder is an individual shareholder or an entity that has the common goal of controlling the Bank, based on or not based on an agreement.		

Criteria	Explanation	Page	Regulations
Share listing chronology	Chronology of share listing, number of shares, number of listed shares after each corporate action, 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 splits (stock split), merger of shares (reverse stock), stock dividends, bonus shares, and changes in the nominal value of shares, implementation of conversion effects, implementation of capital additions and reductions (if any).	192-195	SEOJK 16
Information on the listing of other securities	Information on the listing of other securities that are not yet due in the financial year at least contains the names of the securities, the type of corporate action that causes a change in the number of other securities, year of issue, interest rate/yield, maturity date, offering value, name of stock exchange where other securities are listed, and securities rating (if any).	194-205	SEOJK 16
Information on the use of public accounting services (AP) and public accounting firms (KAP)	Information on the use of public accounting services (AP) and public accounting firms (KAP) and their networks/ associations/alliance includes:	206	SEOJK 16
	1. Name and address.		
	2. Assignment period.		
	3. Information on audit and/or non-audit services provided.		
	4. Audit and/or non-audit service fees for each assignment given during the financial year.		
	5. In the event that the designated AP and KAP and their network/ association/alliance do not provide non-audit services, then 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.		
Name and address of supporting institution and/or profession.	Names and addresses of capital market supporting institutions and/or professions other than AP and KAP.	206-212	SEOJK 16
Awards and Certifications.	Information includes, among others:	213-219	SEOJK 9
	1. Name of award and/or certification (national and international scale).		
	2. Year of award and/or certification.		
	3. Awarding and/or certification bodies.		
	4. Validity period (for certification).		
MANAGEMENT DISCUSSION AND ANALYSIS OF THE COMPANY'S PERFORMANCE			
Bank Strategic Plan	1. Long term plan (corporate plan). 2. Medium and short term plans (business plan).	230-239	SEOJK 13 POJK 17
Operational review per business segment	Operational review per business segment according to the type of industry of the Issuer or Public Company, at least concerning:		SEOJK 9 SEOJK 16
	1. Explanation of each business segment.	260-275, 282-297	
	2. Performance per business segment, among others:		
	a. Production, which includes process, capacity, and development.	260-275, 282-297	
	b. Increase/decrease in production capacity.	260-275, 282-297	
	c. Sales/business income.	298-300	
	d. Profitability.	298-300	

Criteria	Explanation	Page	Regulations
Description of the company's financial performance	Comprehensive financial performance which includes a comparison of financial performance in the last 2 (two) financial years (in the form of narratives and tables), an explanation of the causes of the changes and the impact of these changes, at least concerning:		SEOJK 9 SEOJK 16
	1. Current assets, non-current assets, and total assets.	302-303, 306-308	
	2. Short term liabilities, long term liabilities and total liabilities.	303-305, 308-309	
	3. Funding (investment and giving credit/financing).	306-307	
	4. Third party funds and other funding sources.	308-309	
	5. Equity.	306, 309-310	
	6. Income/sales, expenses, profit (loss), other comprehensive income, and total comprehensive profit (loss).	310-314	
	7. Cash flow.	314-316	
	8. Basic credit interest rate.	326	SEOJK 9
Analysis of the quality of earning assets and relevant financial ratios.		326-328	SEOJK 9
Discussion and analysis of the ability to pay debts and the collectability of the company's receivables, by presenting the calculation of the relevant ratio according to the type of company's industry.	Explanation of:		SEOJK 16
	1. Ability to pay debts, both short term (liquidity) and long term (solvability).	317-319	
	2. Receivables collectibility level.	320	
Discussion on capital structure and management policies on capital structure (capital structure policy).	Top explanation:		SEOJK 16
	1. Details of the capital structure (capital structure), which consists of interest-based debt/sukuk and equity.	330	
	2. Management policies on capital structure (capital structure policies).	329-330	
	3. Basis for selection of management policies.	329-330	
Discussion on material commitments for capital goods investment (not funding commitments) in the last financial year.	Explanation of:		SEOJK 16
	1. The name of the party making the bond.	331-332	
	2. The purpose of the bond.	332	
	3. Source of funds expected to fulfill these ties.	332	
	4. The currency to be denominated.	331-332	
	5. The steps the company plans to take to protect against risks from related foreign currency positions.	332	
	Notes: if the company has no ties related to investment in capital goods in the last financial year to be disclosed.		
Discussion on investment in capital goods realized in the last financial year.	Explanation of:		SEOJK 9 SEOJK 16
	1. Types of investment in capital goods.	332-333	
	2. The purpose of investing in capital goods.		
	3. Investment value of capital goods issued in the last financial year.		
	Notes: if there is no realization of investment in capital goods, so that it is disclosed.		

Criteria	Explanation	Page	Regulations
Description of the company's business prospects.	The business prospects of Issuers or Public Companies are linked to industry conditions, the general economy and international markets accompanied by quantitative supporting data from reliable data sources.	336-338	SEOJK 16
Comparative information between targets at the beginning of the financial year with the results achieved (realization), and targets or projections to be achieved for the next year.	Comparison between targets/projections at the beginning of the financial year with the results achieved (realization), regarding:		SEOJK 16
	1. Sales revenue.	340	
	2. Profit and loss.	340	
	3. Capital structure.	340	
	4. Marketing.	341	
	5. HR Development.	341	
	6. Other matters deemed important by the Issuer or Public Company.	339-340	
	Targets/projections to be achieved by Issuers or Public Companies for the next 1 (one) year, regarding:		
	1. Sales revenue.	342	
	2. Profit and loss.	342	
	3. Capital structure.	343	
	4. Dividend policy.	343	
	5. Marketing.	344	
	6. HR Development.	345	
	7. Other matters deemed important by the Issuer or Public Company.	342	
Description of the marketing aspect.	Marketing aspects of the Issuer's or Public Company's goods and/or services, at least regarding marketing strategy and market share.	240-257	SEOJK 9 SEOJK 16
Description of dividends for the last 2 (two) financial years.	Description of dividends for the last 2 (two) financial years, at least:		SEOJK 16
	1. The dividend policy, among other things, contains information on the percentage of the amount of dividends distributed to net income.	346-348	
	2. Cash dividend payment date and/or non-cash dividend distribution date.	347	
	3. Amount of dividends per share (cash and/or non-cash).	347	
	4. The amount of dividends per year paid.	347	
	Notes: if there is no distribution of dividends, please state the reasons.		

Criteria	Explanation	Page	Regulations
Realization of the use of proceeds from the public offering (in the event that the company is still required to submit a report on the realization of the use of funds)	Contains descriptions of:		SEOJK 16
	1. Total proceeds.	348	
	2. Fund usage plan.		
	3. Details of use of funds.		
	4. Fund balance.		
	5. The date of approval of the GMS/RUPO for changes in the use of funds (if any).		
	a. In the event that during the financial year, the Issuer has an obligation to submit a report on the realization of the use of funds, the cumulative realization of the use of proceeds from public offerings until the end of the financial year is disclosed. b. In the event that there is a change in the use of funds as stipulated in the Financial Services Authority Regulation regarding the report on the realization of the use of funds from a public offering, the Issuer shall explain the change.		
	Note: if you do not have information on the realization of the use of proceeds from a public offering, please disclose it.		
Material information (if any), including investment, expansion, divestment, business merger/ consolidation, acquisition, debt/ capital restructuring, material transactions, affiliated transactions, and conflict of interest transactions.	Contains descriptions of:	348-360	SEOJK 16
	a. Date, value, and transaction object.		
	b. The name of the party conducting the transaction.		
	c. Nature of the affiliation relationship (if any).		
	d. Explanation of the fairness of the transaction.		
	e. Fulfillment of related provisions.		
	f. In the event that there is an affiliation relationship, apart from disclosing the information referred to in number a) through number f), the Issuer or Public Company also discloses information:		
	1) The Board of Directors' statement that affiliated transactions have gone through adequate procedures to ensure that affiliated transactions are carried out in accordance with generally accepted business practices, among others, carried out by fulfilling the arm's length principle.		
	2) The role of the Board of Commissioners and the audit committee in carrying out adequate procedures to ensure that affiliated transactions are carried out in accordance with generally accepted business practices, among others, is carried out by fulfilling the 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 case of 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.		

Criteria	Explanation	Page	Regulations
	h. For disclosure of affiliated transactions and/or conflict of interest transactions which are the result of the implementation of 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 affiliated transactions and/or conflict of interest transactions.		SEOJK 16 SEOJK 13
	i. In the event that there are no affiliated transactions and/or conflict of interest transactions, then this is disclosed.		
Description of changes to laws and regulations on companies in the last financial year.	The description contains, among others:		SEOJK 16
	1. The names of the laws and regulations that have changed.	360-361	
	2. The impact (quantitative and/or qualitative) on the company (if significant) or the statement that the impact is not significant.		
	Notes: if there is no change in laws and regulations in the last financial year, so that it is disclosed.		
Description of changes in accounting policies implemented by the company in the last financial year.	The description contains, among others:		SEOJK 16
	1. Changes in accounting policies.	362-363	
	2. Reasons for changes in accounting policies.		
	3. Quantitative impact on financial statements.		
	Notes: If there is no change in accounting policy in the last financial		
Information on Risk Exposure and Capital.	Risk exposure and capital includes annual period risk and capital exposure reports as stipulated in part II of the Publication Report on risk and capital exposure.	375-431	SEOJK 9
GOOD CORPORATE GOVERNANCE			
GMS.	Information regarding GMS resolutions in the financial year and 1 (one) year before the financial year includes:	492-508	SEOJK 16
	a. GMS resolutions in the financial year and 1 (one) year prior to the financial year realized in the financial year.		
	b. GMS decisions in the financial year and 1 (one) year prior to the financial year that have not been realized along with the reasons for not being realized.		
	In the event that an Issuer or Public Company uses an independent party in the implementation of the GMS to carry out the vote count, it shall be disclosed regarding this matter.		
Directors.	1. 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.	509-510	SEOJK 13 SEOJK 16 POJK 17
	2. Statement that the Board of Directors has a guideline or charter (charter) of the Board of Directors.	512	SEOJK 16
	3. Policy and implementation of the frequency of meetings of the Board of Directors, meetings of the Board of Directors with the of Commissioners, and the level of attendance of members of the Board of Directors at these meetings including attendance at the GMS. Information on the level of attendance of members of the Board of Directors at meetings of the Board of Directors, meetings of the Board of Directors with the Board of Commissioners or GMS can be presented in tabular form.	514-530	SEOJK 16

Criteria	Explanation	Page	Regulations
	4. Training and/or competency improvement for members of the Board of Directors:	531-534	SEOJK 16
	a. Policy on training and/or competency improvement for members of the Board of Directors, including an orientation program for newly appointed members of the Board of Directors (if any).		
	b. Training and/or competency improvement attended by members of the Board of Directors in the financial year (if any).		
	5. The Board of Directors' assessment of the performance of the committees that support the implementation of the duties of the Board of Directors in the financial year contains at least:	534-535	SEOJK 16
	a. Performance appraisal procedures.		
	b. The criteria used include performance achievements during the financial year, competence and attendance at meetings.		
	In the event that the Issuer or Public Company does not have a committee that supports the implementation of the duties of the Board of Directors, this will be disclosed.		
	6. members of the Board of Commissioners who reach 5% (five percent) or more of paid-up capital, which includes the type and number of shares in: a. The bank in question. b. other banks. c. Non-bank financial institutions. d. Other companies domiciled both inside and outside the country.	585-586	SEOJK 13 POJK 17
Board of Commissioners.	1. Duties and responsibilities of the Board of Commissioners.	536	SEOJK 13 SEOJK 16 POJK 17
	2. Statement that the Board of Commissioners has guidelines or charter of the Board of Commissioners.	540	SEOJK 16
	3. Policy and implementation of the frequency of meetings of the Board of Commissioners, meetings of the Board of Commissioners with the Board of Directors and the level of attendance of members of the Board of Commissioners at these meetings including attendance at the GMS. Information on the level of attendance of members of the Board of Commissioners at meetings of the Board of Commissioners, meetings between the Board of Commissioners and the Board of Directors, or GMS can be presented in tabular form.	546-557	SEOJK 13 SEOJK 16
	4. Training and/or competency improvement for members of the Board of Commissioners:	558-561	SEOJK 16
	a. Policy on training and/or competency improvement for members of the Board of Commissioners, including an orientation program for newly appointed members of the Board of Commissioners (if any).		
	b. Training and/or competency improvement attended by members of the Board of Commissioners in the financial year (if any).		
	5. Assessment of the performance of the Board of Directors and the Board of Commissioners as well as each member of the Board of Directors and members of the Board of Commissioners, contains at least:	562-571	SEOJK 16
	a. Procedure for implementing performance appraisal.		
	b. The criteria used include performance achievements during the financial year, competence and attendance at meetings.		
	b .The party making the assessment.		

Criteria	Explanation	Page	Regulations
	6. The Board of Commissioners' assessment of the performance of the Committees that support the implementation of the duties of the Board of Commissioners in the financial year includes:	572-575	SEOJK 16
	a. Performance appraisal procedures.		
	b. The criteria used include performance achievements during the financial year, competence and attendance at meetings.		
Nomination and remuneration of the Board of Directors and Board of Commissioners.	Least load:		
	1. 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.	576-577	SEOJK 16
	2. Procedures and implementation of remuneration for the Board of Directors and Board of Commissioners, including:		SEOJK 16
	a. Procedure for determining remuneration for the Board of Directors and Board of Commissioners.	577-578	
	b. Disclosure of indicators for determining the remuneration of the Board of Directors.	578-579	
	c. The remuneration structure for the Board of Directors and the Board of Commissioners such as salaries, allowances, bonuses/ bonuses and others; And **Notes:** if there are no performance bonuses, non performance bonuses and stock options received by each member of the Board of Commissioners and Board of Directors, to be disclosed.	578	
	d. The amount of remuneration for each member of the Board of Directors and members of the Board of Commissioners; Disclosure of information can be presented in tabular form.	580-581	
Sharia supervisory board, for Issuers or Public Companies that carry out business activities based on sharia principles as stated in the articles of association.	Least load:		SEOJK 16
	a. Name.	785	
	b. The legal basis for the appointment of the Sharia Supervisory Board.		
	c. The assignment period of the Sharia Supervisory Board.		
	d. Duties and responsibilities of the Sharia Supervisory Board.	785-786	
	e. Frequency and method of providing advice and suggestions as well as monitoring compliance with sharia principles in the capital market to Issuers or Public Companies.	791-792	
Audit Committee.	1. Name and title in the membership of the committee.	595-596	SEOJK 16 POJK 17
	2. Age.		
	3. Citizenship.		
	4. Educational background.		
	5. Position history, including information on:		
	a. Legal basis for appointment as committee member.		
	b. Concurrent positions, both as members of the Board of Commissioners, members of the board of directors, and/ or committee members and other positions (if any).		
	c. Work experience and time period both inside and outside the issuer or public company.		
	6. Period and tenure of audit committee members.		
	7. Description of duties and responsibilities.	591-593	
	8. Audit committee independence statement.	598-597	
	9. Training and/or competency improvement that has been attended in the financial year (if any).	597-599	

Criteria	Explanation	Page	Regulations
	10.Policy and implementation of the frequency of audit committee meetings and the level of attendance of audit committee members at these meetings.	599-604	SEOJK 13 SEOJK 16 POJK 17
	11. Implementation of audit committee activities in the financial year according to what is stated in the audit committee guidelines or charter.	604-605	
Issuer or Public Company nomination and remuneration committee or function.	Least load:		
	1. Name and title in the membership of the committee.	611-612	SEOJK 16 POJK 17
	2. Age.		
	3. Citizenship.		
	4. Educational background.		
	5. Position history, including information on:		
	a. Legal basis for appointment as committee member.		
	b. Concurrent positions, both as members of the Board of Commissioners, members of the board of directors, and/or committee members and other positions (if any).		
	c. Work experience and time period both inside and outside the issuer or public company.		
	6. Period and tenure of committee members.		
	7. Committee independence statement.	613	
	8. Training and/or competency improvement that has been attended in the financial year (if any).	614-616	
	9. Description of duties and responsibilities.	606-608	
	10.Statement that already has a guideline or charter.	608-609	
	11. Policy and implementation of the frequency of meetings and the level of attendance of members at these meetings.	616-620	
	12.A brief description of the implementation of activities in the financial year.	621	
	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		
	2. Parties carrying out nomination and remuneration functions.		

Criteria	Explanation	Page	Regulations
Other committees owned by Issuers or Public Companies in order to support the functions and duties of the Board of Directors (if any) and/ or committees that support the functions and duties of the Board of Commissioners.	Least load:	625-626	SEOJK 16 POJK 17
	1. Name and title in the membership of the committee.		
	2. Age.		
	3. Citizenship.		
	4. Educational background.		
	5. Position history, including information on:		
	a. Legal basis for appointment as committee member.		
	b. Concurrent positions, both as members of the Board of Commissioners, members of the board of directors, and/ or committee members and other positions (if any).		
	c. Work experience and time period both inside and outside the issuer or public company.		
	6. Period and tenure of committee members.		
	7. Committee independence statement.	626	
	8. Training and/or competency improvement that has been attended in the financial year (if any).	627-629	
	9. Description of duties and responsibilities.	622	
	10.Statement that already has a guideline or charter.	623	
	11. Policy and implementation of the frequency of meetings and the level of attendance of members at these meetings.	629-636	
	12.A brief description of the implementation of activities in the financial year.	636-637	
Company secretary.	1. Name.	639	SEOJK 16
	2. domicile.		
	3. Position history, including:		
	a. Legal basis for appointment as company secretary.		
	b. Work experience and time period both inside and outside the issuer or public company.		
	4. Educational background.		
	5. Training and/or competency improvement attended in the financial year.	639-640	
	6. Brief description of the implementation of the duties of the corporate secretary in the financial year.	641-642	
Internal Audit Unit.	1. Name of the head of the internal audit unit.	646	SEOJK 16 POJK 17
	2. Position history, including:		
	a. Legal basis for appointment as company secretary.		
	b. Work experience and time period both inside and outside the issuer or public company.		
	3. Qualification or certification as internal audit profession (if any).		
	4. Number of employees (internal auditors) in the internal audit unit.	648	
	5. Training and/or competency improvement attended in the financial year.	649-651	

Criteria	Explanation	Page	Regulations
	6. The structure and position of the internal audit unit.	645-646	
	7. Description of duties and responsibilities.	647	
	8. A statement that the internal audit unit has guidelines or charters.	647	
	9. A brief description of the implementation of the duties of the internal audit unit in the financial year including the policy and implementation of the frequency of meetings with the directors, board of commissioners and/or the audit committee.	653-658	
Public Accountant.	1. The name and year of the public accountant who audited the annual financial statements for the last 5 years.	698-699	POJK 17
	2. The name and year of the public accountant who audited the annual financial statements for the last 5 years.		
	3. The amount of the fee for each type of service provided by the Public Accounting Firm in the last financial year.		
	4. Other services provided by the Public Accounting Firm and public accountants in addition to auditing the annual financial statements for the last financial year.		
	Notes: if there is no other service in question, so that it is disclosed.		
Description of the internal control system implemented by the issuer or public company.	1. Financial and operational control, as well as compliance with other laws and regulations.	700-701	SEOJK 13 SEOJK 16
	2. Review of the effectiveness of the internal control system.	702-	
	3. Statement of the Board of Directors and/or Board of Commissioners regarding the adequacy of the internal control system.	703	SEOJK 16
Risk management system implemented by Issuers or Public Companies.	1. General description of the Issuer's or Public Company's risk management system.	707-711	SEOJK 16 SEOJK 13
	2. Types of risk and how to manage them.	711-717	
	3. Review of the effectiveness of the Issuer's or Public Company's risk management system.	719	
	4. Statement of the Board of Directors and/or Board of Commissioners or the audit committee on the adequacy of the risk management system.	719-721	SEOJK 16
Compliance function.	The level of the Bank's compliance with all provisions and laws and regulations as well as fulfillment of commitments with the competent authorities.	721-723	SEOJK 13 POJK 17
Legal cases with a material impact faced by issuers or public companies, subsidiaries, members of the board of directors and members of the board of commissioners (if any).	1. Main case/lawsuit.	736-737	SEOJK 16
	2. Case/lawsuit settlement status.		
	3. The impact on the condition of issuers or public companies. The risks faced by the company and the nominal value of claims/lawsuits.		
	4. Disclosure regarding legal issues at least includes: a. the number of civil and criminal cases faced and decisions that have permanent legal force. b. the number of civil and criminal matters faced and still in the process of being resolved. **Notes:** in the event that the company, subsidiaries, members of the Board of Commissioners and members of the Board of Directors do not have important matters, this must be disclosed.		SEOJK 13

Criteria	Explanation	Page	Regulations
Information on administrative sanctions/sanctions imposed on issuers or public companies, board members commissioners and members of the board of directors, by the Financial Services Authority and other authorities in the financial year (if any).		737	SEOJK 16
Information regarding the code of ethics of Issuers or Public Companies	1. Principles of the code of ethics.	755-756	SEOJK 16
	2. Forms of dissemination of the code of ethics and enforcement efforts	757	
	3. Statement that the code of ethics applies to members of the Board of Directors, members of the Board of Commissioners, and employees of the Issuer or Public Company	757	
Implementation of Governance in Providing Remuneration for Banks.	1. Remuneration Committee a. Name of members, composition, duties and responsibilities. b. Number of meetings held. c. Remuneration that has been paid to members of the Remuneration Committee for 1 (one) year.	690	POJK 45
	2. Remuneration policy formulation process which includes: a. Review of the background and objectives of the Remuneration policy. b. Implementation of a review of the Remuneration policy in the previous year, along with its improvements. c. Mechanism to ensure that Remuneration for Employees in the control unit is independent from the work unit they supervise.	690-691	
	3. Remuneration policy coverage and its implementation per business unit, per region and in subsidiaries or branch offices located overseas	691	
	4. Remuneration is associated with risks that include: a. The main type of risk (key risk) used in implementing Remuneration. b. Criteria for determining the main types of risk, including for risks that are difficult to measure. c. The impact of determining the main risk on the Variable Remuneration policy. d. Changes in the determination of the main types of risk compared to last year and the reasons, if any.	691	
	5. Performance measurement is associated with Remuneration which includes: a. Review of Remuneration policies linked to performance appraisal. b. The method of linking individual Remuneration with Bank performance, work unit performance and individual performance. c. A description of the method used by the Bank to state that the agreed performance cannot be achieved, so it is necessary to make adjustments to remuneration and the amount of remuneration adjustments if this condition occurs.	691	
	6. Remuneration Adjustment is related to Performance and Risk which includes: a. Policy regarding Variable Remuneration that is deferred, the amount, and the criteria for determining the amount. b. The Bank's policy regarding Variable Deferred Remuneration which is postponed for payment (malus), or withdrawn when it has been paid (clawback).	691-692	
	7. The name of the external consultant and the duties of the consultant related to the Remuneration policy, if the Bank uses the services of an external consultant	692	

Criteria	Explanation	Page	Regulations
	8. The Remuneration Package and facilities received by the Board of Directors and Board of Commissioners include the Remuneration structure and details of the nominal amount.	692-693	
	9. Variable Remuneration includes: a. Forms of Variable Remuneration along with the reasons for choosing this form. And b. An explanation if there are differences in the provision of Variable Remuneration among the Directors, Board of Commissioners and/or Employees.	693	
	10.the number of Directors, Board of Commissioners and Employees who receive Variable Remuneration for 1 (one) year, and the total amount.	693	
	11. Position and number of parties who are material risk takers.	693-694	
	12.Shares optionowned by the Board of Directors, Board of Commissioners and Executive Officers.	694-696	
	13.The ratio of the highest and lowest salaries	696	
	14.The number of beneficiaries and the total amount of Variable Remuneration guaranteed unconditionally will be given by the Bank to candidates for the Board of Directors, candidates for the Board of Commissioners, and/or prospective Employees during the first 1 (one) year of work	697	
	15.The number of employees affected by termination of employment and the total amount of severance paid	697	
	16.The total amount of deferred Variable Remuneration, which consists of cash and/or shares or share-based instruments issued by the Bank.	697	
	17. The total amount of deferred Variable Remuneration paid for 1 (one) year.	697	
	18.Details of the amount of Remuneration given in one year include: a. Fixed or variable remuneration. b. Deferred and non-deferred remuneration. c. Forms of Remuneration provided in cash and/or shares or share-based instruments issued by the Bank.	697	
	19.Quantitative information about: a. The total remaining Remuneration that is still suspended, both exposed to implicit and explicit adjustments. a. Total reduction in Remuneration caused by explicit adjustments during the reporting period. b. Total reduction in Remuneration caused by implicit adjustments during the reporting period.	697	
A brief description of the policy of providing performance-based longterm compensation to management and/or employees owned by issuers or public companies (if any), including but not limited to management stock ownership programs *program ownership*/ MSOP) and/or employee stock ownership program (ESOP).	In terms of compensation in the form of management stock ownership program (MSOP) and/or employee stock ownership program (ESOP). The information disclosed shall contain at least:	759	SEOJK 16
	1. Number of shares and/or options.		
	2. Implementation period.		
	3. Eligible employee and/or management requirements.		
	4. The exercise price or the determination of the exercise price.		

Criteria	Explanation	Page	Regulations
A brief description of the Information disclosure policy regarding	1. 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 shares of the Public Company.	586-589	SEOJK 16
	2. Implementation of the intended policy.		
Description of the whistleblowing system at the Issuer or Public Company.	1. How to submit a violation report.	760	SEOJK 16
	2. Protection for reporters.	760	
	3. The handling of complaints.	761-767	
	4. The party managing the complaint.	768	
	5. The results of handling complaints, at least:	768	
	a. Number of complaints received and processed in the financial year.		
	b. Complaint follow-up.		
	In the event that an issuer or a public company does not have a whistleblowing system, this will be disclosed.		
Description of the Issuer's or Public Company's anti-corruption policy.	1. Programs and procedures carried out in Overcoming corrupt practices, kickbacks, fraud, bribery and/or gratuities in Issuers or Public Companies.	769-776	SEOJK 16 POJK 17
	2. Anti-corruption training/socialization for employees of Issuers or Public Companies.	776-777	
	In the event that the Issuer or Public Company does not have an anticorruption policy, the reasons for not having the said policy will be explained.		
Handling conflicts of interest		780	SEOJK 13 POJK 17
Provision of funds to related parties and provision of large funds (large exposure).	Information that needs to be disclosed is the total amount of debit balances for provision of funds to related parties and to core debtors (individuals or groups) per report position	779	SEOJK 13
Transparency of the Bank's financial and non-financial conditions that have not been disclosed in other reports.		780	SEOJK 13 POJK 17
Other information related to Bank Governance, including owner intervention, internal disputes or problems that arise as a result of remuneration policies at the Bank.		780	SEOJK 13
Number of Deviations (Internal Fraud).	Disclosure of irregularities (internal fraud) at least includes: 1. Number of deviations (internal fraud) that have been resolved. 2. The number of irregularities (internal fraud) that are in the process of being resolved internally at the bank. 3. Number of irregularities (internal fraud) that have not been resolved internally at the bank. 4. The number of irregularities (internal fraud) that have been followed up through the legal process.	779	SEOJK 13
Buy Back of Shares and/or Bank Bonds.	1. Policy in buying back shares or bonds of the Bank. 2. Number of shares and/or bonds bought back. 3. Repurchase price per share and/or bond. 4. Increase in earnings per share and/or bonds.	779	SEOJK 13
Provision of Funds for Social Activities and/or Political Activities During the Reporting Period.	Disclosure regarding the provision of funds for social activities and/or political activities at least includes the recipient of the funds and the amount of funds provided.	779	SEOJK 13

Criteria	Explanation	Page	Regulations
Implementation of sustainable finance, including implementation of social and environmental responsibility		780	POJK 17
Implementation of Public Company governance guidelines for Issuers that issue equity securities or Public Companies.	1. Statement regarding recommendations that have been implemented and/or	798-808	SEOJK 16
	2. 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.		
SOCIAL AND ENVIRONMENTAL RESPONSIBILITY OF THE ISSUER OR PUBLIC COMPANY			
Corporate Social Responsibility	1. The information disclosed in the social and environmental responsibility section is a Sustainability Report as intended in Financial Services Authority Regulation Number 51/POJK.03/2017 concerning the Implementation of Sustainable Finance for Financial Services Institutions, Issuers and Public Companies, containing at least :	826-846	SEOJK 16
	a) Explanation of sustainability strategy.		
	b) Overview of sustainability aspects (economic, social and environmental).		
	c) Brief profile of the Issuer or Public Company.		
	d) Directors' Explanation.		
	e) Sustainability governance.		
	f) Sustainability performance.		
	g) Written verification from an independent party, if any.		
	h) Feedback sheet for readers, if any.		
	i) The Issuer's or Public Company's response to feedback from the previous year's report.		
	2. 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 stated in Appendix II which is an inseparable part of this Financial Services Authority Circular Letter.		
	3. Sustainability Report information in number 1) can:		
	a) Disclosed in other relevant sections outside the social and environmental responsibility section, such as the Directors' explanation regarding the Sustainability Report disclosed in the relevant section of the Directors' Report; and/or		

Criteria	Explanation	Page	Regulations
	b) Refer to other sections outside the social and environmental responsibility section while still referring to the Technical Guidelines for Preparing Sustainability Reports for Issuers and Public Companies as listed in Appendix II which is an inseparable part of this Financial Services Authority Circular Letter, such as the profile Issuer or Public Company.	826-846	
	4. The Sustainability Report as referred to in number 1) is an inseparable part of the Annual Report but can be presented separately from the Annual Report.		
	5. In the event that the Sustainability Report is presented separately from the Annual Report, the information disclosed in the Sustainability Report must:		
	a) Contains all information as intended in number 1); And		
	b) Prepared in accordance with the Technical Guidelines for Preparing Sustainability Reports for Issuers and Public Companies as stated in Appendix II which is an inseparable part of this Financial Services Authority Circular Letter.		
	6. If 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. Submission of a Sustainability Report which is presented separately with the Annual Report must be submitted simultaneously with the submission of the Annual Report.		

Information

SEOJK 16 : OJK Circular Letter No. 16/SEOJK.04/2021 concerning Form and Content of Annual Reports of Issuers or Public Companies.

SEOJK 9 : OJK Circular Letter No. 9/SEOJK.03/2020 concerning Transparency and Publication of Conventional Commercial Bank Reports.

SEOJK 13 : OJK Circular Letter No. 13/SEOJK.03/2017 concerning Implementation of Governance for Commercial Banks.

POJK 45 : OJK Regulation No. 45/POJK.03/2015 concerning Implementation of Governance in Providing Remuneration for Commercial Banks.

POJK 17 : OJK Regulation 17 of 2023 concerning the Implementation of Governance for Commercial Banks

PT Bank Tabungan Negara (Persero) Tbk

Laporan keuangan Tanggal 31 Desember 2024
dan untuk tahun yang berakhir pada tanggal tersebut
beserta laporan auditor independen/
Financial statements As of December 31, 2024 and
for the year then ended with independent auditors' report

SURAT PERNYATAAN DEWAN DIREKSI TENTANG TANGGUNG JAWAB ATAS LAPORAN KEUANGAN TANGGAL 31 DESEMBER 2024 DAN UNTUK TAHUN YANG BERAKHIR PADA TANGGAL TERSEBUT PT BANK TABUNGAN NEGARA (PERSERO) Tbk

BOARD OF DIRECTORS' STATEMENT REGARDING THE RESPONSIBILITY FOR THE FINANCIAL STATEMENTS AS OF DECEMBER 31, 2024 AND FOR THE YEAR THEN ENDED PT BANK TABUNGAN NEGARA (PERSERO) Tbk

Kami, yang bertanda tangan di bawah ini / *We, the undersigned below*

1	Nama	Nixon L.P. Napitupulu	*Name*
	Alamat kantor	PT Bank Tabungan Negara (Persero) Tbk Jl. Gajah Mada No. 1 Jakarta 10130	*Office address*
	Alamat domisili atau sesuai KTP	Jl. Wijaya I No. 13 Kel. Petogogan, Kec. Kebayoran Baru Jakarta Selatan	*Domicile address or address according to ID*
	Nomor telepon	021-6346762	*Telephone number*
	Jabatan	Direktur Utama/*President Director*	*Title*
2	Nama	Nofry Rony Poetra	*Name*
	Alamat kantor	PT Bank Tabungan Negara (Persero) Tbk Jl. Gajah Mada No. 1 Jakarta 10130	*Office address*
	Alamat domisili atau sesuai KTP	Jl. Taman Palra XII No. 17 Kel. Kuningan Timur, Kec. Setiabudi Jakarta Selatan	*Domicile address or address according to ID*
	Nomor telepon	021-52f4529	*Telephone number*
	Jabatan	Direktur *Finance/Director of Finance*	*Title*

menyatakan bahwa / *declare that*

1. Kami bertanggung jawab atas penyusunan dan penyajian laporan keuangan PT Bank Tabungan Negara (Persero) Tbk.
2. Laporan keuangan PT Bank Tabungan Negara (Persero) Tbk telah disusun dan disajikan sesuai dengan Standar Akuntansi Keuangan di Indonesia.
3. a. Semua informasi dalam laporan keuangan PT Bank Tabungan Negara (Persero) Tbk telah diungkapkan secara lengkap dan benar; dan
   b. Laporan keuangan PT Bank Tabungan Negara (Persero) Tbk tidak mengandung informasi atau fakta materia yang tidak benar, dan tidak menghilangkan informasi atau fakta material;
4. Kami bertanggung jawab atas sistem pengendalian internal dalam PT Bank Tabungan Negara (Persero) Tbk

1. *We are responsible for the preparation and presentation of the financial statements of PT Bank Tabungan Negara (Persero) Tbk;*
2. *The financial statements of PT Bank Tabungan Negara (Persero) Tbk have been prepared and presented in accordance with Indonesian Financial Accounting Standards*
3. a. *All information in the financial statements of PT Bank Tabungan Negara (Persero) Tbk have been fully disclosed in a complete and truthful manner, and*
   b. *The financial statements of PT Bank Tabungan Negara (Persero) 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 Tabungan Negara (Persero) Tbk.*

Demikian pernyataan ini dibuat dengan sebenarnya / *This statement is made truthfully*

Jakarta, 12 Februari 2025/*Jakarta, February 12, 2025*

METERAI TEMPEL

Nixon L.P. Napitupulu
Direktur Utama/*President Director*

Nofry Rony Poetra
Direktur *Finance*/*Director of Finance*

PT Bank Tabungan Negara (Persero) Tbk
Kantor Pusat
Menara Bank BTN
Jl. Gajah Mada No. 1, Jakarta Pusat 10130 Indonesia
T +62 21 633 0789, 633 2655
E ird@btn.co.id
www.btn.co.id

The original financial statements included herein are in the Indonesian language.

PT BANK TABUNGAN NEGARA (PERSERO) TBK
LAPORAN KEUANGAN
TANGGAL 31 DESEMBER 2024 DAN
UNTUK TAHUN YANG BERAKHIR
PADA TANGGAL TERSEBUT
BESERTA LAPORAN AUDITOR INDEPENDEN

PT BANK TABUNGAN NEGARA (PERSERO) TBK
FINANCIAL STATEMENTS
AS OF DECEMBER 31, 2024 AND
FOR THE YEAR THEN ENDED
WITH INDEPENDENT AUDITORS' REPORT

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Purwantono, Sungkoro & Surja

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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. 00046/2.1032/AU.1/07/1681-2/1/II/2025

Pemegang Saham, Dewan Komisaris, dan Direksi
PT Bank Tabungan Negara (Persero) Tbk.

Opini

Kami telah mengaudit laporan keuangan PT Bank Tabungan Negara (Persero) Tbk. ("Bank") terlampir, yang terdiri dari laporan posisi keuangan tanggal 31 Desember 2024, 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 2024, 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.

Independent Auditor's Report

Report No. 00046/2.1032/AU.1/07/1681-2/1/II/2025

The Shareholders, the Board of Commissioners, and the Board of Directors
PT Bank Tabungan Negara (Persero) Tbk.

Opinion

We have audited the accompanying financial statements of PT Bank Tabungan Negara (Persero) Tbk. (the "Bank"), which comprise the statement of financial position as of December 31, 2024, and the statements of profit or loss and other comprehensive, 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, 2024, 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.

Laporan Auditor Independen (lanjutan)

Laporan No. 00046/2.1032/AU.1/07/1681-2/1/II/2025 (lanjutan)

Independent Auditor's Report (continued)

Report No. 00046/2.1032/AU.1/07/1681-2/1/II/2025 (continued)

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 hal audit utama di bawah ini, penjelasan kami tentang bagaimana audit kami merespons hal tersebut disampaikan dalam konteks tersebut.

Kami telah memenuhi tanggung jawab yang diuraikan dalam paragraf Tanggung Jawab Auditor terhadap Audit atas Laporan Keuangan pada laporan kami, termasuk sehubungan dengan hal audit utama yang dikomunikasikan di bawah ini. Oleh karena itu, audit kami mencakup pelaksanaan prosedur yang dirancang untuk merespons penilaian kami atas risiko kesalahan penyajian material dalam laporan keuangan terlampir. Hasil prosedur audit kami, termasuk prosedur yang dilakukan untuk merespons hal audit utama di bawah ini, menyediakan basis bagi opini kami atas laporan keuangan terlampir.

Key audit matter

Key audit matters are those matters that, in our professional judgment, 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 the key audit matter below, our description of how our audit addressed such key audit matter is provided in such context.

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 key audit matter communicated below. Accordingly, our audit included the performance of procedures designed to respond to our assessment of the risks of material misstatement of the accompanying financial statements. The results of our audit procedures, including the procedures performed to address the key audit matter below, provide the basis for our opinion on the accompanying financial statements.

Laporan Auditor Independen (lanjutan)

Laporan No. 00046/2.1032/AU.1/07/1681-2/1/II/2025 (lanjutan)

Independent Auditor's Report (continued)

Report No. 00046/2.1032/AU.1/07/1681-2/1/II/2025 (continued)

Hal audit utama (lanjutan)

Key audit matter (continued)

Cadangan kerugian penurunan nilai atas kredit yang diberikan dan pembiayaan/piutang syariah

Allowance for impairment losses on loans and sharia financing/receivables

Penjelasan atas hal audit utama:

Description of the key audit matter:

Seperti yang dijelaskan dalam Catatan 11 atas laporan keuangan terlampir, pada tanggal 31 Desember 2024, cadangan kerugian penurunan nilai atas kredit yang diberikan dan pembiayaan/piutang syariah adalah sebesar Rp13.057.187 juta. Kebijakan akuntansi signifikan untuk cadangan kerugian penurunan nilai atas kredit yang diberikan dan pembiayaan/piutang syariah diungkapkan dalam Catatan 2e atas laporan keuangan terlampir. Kami berfokus pada area ini karena nilai tercatat atas kredit yang diberikan dan pembiayaan/piutang syariah dan cadangan kerugian penurunan nilai atas kredit yang diberikan dan pembiayaan/piutang syariah adalah signifikan terhadap laporan keuangan terlampir.

As described in Note 11 to the accompanying financial statements, as of December 31, 2024, the allowance for impairment losses on loans and sharia financing/receivables was Rp13,057,187 million. The significant accounting policies of allowance for impairment losses on loans and sharia financing/receivables are disclosed in Note 2e to the accompanying financial statements. We focused on this area due to the carrying value of loans and syariah financing/receivables and the allowance for impairment losses on loans and syariah financing/receivables are significant to the accompanying financial statements.

Penentuan cadangan kerugian penurunan nilai memerlukan pertimbangan dan memiliki ketidakpastian estimasi termasuk dalam penentuan model untuk menghitung cadangan kerugian penurunan nilai, identifikasi eksposur kredit yang mengalami penurunan kualitas kredit yang signifikan, penentuan asumsi yang digunakan dalam model perhitungan cadangan kerugian penurunan nilai (untuk eksposur yang dinilai secara individu atau kolektif), termasuk faktor ekonomi makro berorientasi masa depan.

Determination of allowance for impairment losses requires judgement and is subject to estimation uncertainty which includes determining the model to calculate allowance for impairment losses, identification of credit exposures with significant deterioration in credit quality, and determining assumptions used in the allowance for impairment losses calculation models (for exposures assessed on an individual or collective basis), including forward-looking macroeconomics factors.

Laporan Auditor Independen (lanjutan)

Laporan No. 00046/2.1032/AU.1/07/1681-2/1/II/2025 (lanjutan)

Independent Auditor's Report (continued)

Report No. 00046/2.1032/AU.1/07/1681-2/1/II/2025 (continued)

Hal audit utama (lanjutan)

Key audit matter (continued)

Cadangan kerugian penurunan nilai atas kredit yang diberikan dan pembiayaan/piutang syariah (lanjutan)

Allowance for impairment losses on loans and sharia financing/receivables (continued)

Respons audit:

Prosedur audit kami dalam merespons hal audit utama tersebut di atas mencakup, antara lain: menguji pengendalian utama atas pemberian kredit, melakukan penilaian kualitas kredit internal secara regular, melakukan pencatatan dan pengawasan kredit yang diberikan, piutang *murabahah*, piutang *istishna*, pembiayaan *mudharabah*, pembiayaan *musyarakah*, dan pinjaman *qardh*, serta pengendalian umum atas sistem perhitungan cadangan kerugian penurunan nilai dan pengendalian aplikasi atas kelengkapan dan keakuratan aliran data dari sistem asal ke sistem perhitungan cadangan kerugian penurunan nilai. Kami juga memperoleh pemahaman dan menilai metodologi pengukuran penurunan nilai, melakukan validasi model cadangan kerugian penurunan nilai, data masukan, dasar, dan asumsi yang digunakan oleh Bank dalam menghitung cadangan kerugian penurunan nilai, serta menguji tiga tahapan kualitas kredit portofolio sesuai dengan kriteria tingkatan (staging) yang disusun oleh Bank untuk kredit yang diberikan, menguji apakah pengalaman historis mewakili keadaan saat ini dan kerugian terkini yang terjadi dalam portofolio, serta menilai kewajaran atas penyesuaian asumsi berorientasi masa depan, analisis faktor ekonomi makro, dan beberapa skenario probabilitas tertimbang untuk kredit yang diberikan.

Audit response:

Our audit procedures address the key audit matter mentioned above included, among others: tested the key controls over the origination, segmentation, regular internal credit quality assessments, recording and monitoring of the loans, murabahah receivables, istishna receivables, mudharabah financing, musyarakah financing, and funds of qardh, and general controls over the allowance for impairment losses system and the application controls over the completeness and accuracy of data flows from source systems to the allowance for impairment losses system. We also obtained understanding and assessed impairment measurement methodologies, validation of allowance for impairment losses models, and inputs, bases and assumptions used by the Bank in calculating the allowance for impairment losses, and tested the classification into three-stage credit quality of loan portfolios in accordance with staging criteria developed by the Bank for loans, tested whether historical experience is representative of current circumstances and of the recent losses incurred in the portfolios, and assessed reasonableness of forward-looking adjustments, macroeconomic factor analysis, and probability-weighted multiple scenarios for loans.

Laporan Auditor Independen (lanjutan)

Laporan No. 00046/2.1032/AU.1/07/1681-2/1/II/2025 (lanjutan)

Independent Auditor's Report (continued)

Report No. 00046/2.1032/AU.1/07/1681-2/1/II/2025 (continued)

Hal audit utama (lanjutan)

Key audit matter (continued)

Cadangan kerugian penurunan nilai atas kredit yang diberikan dan pembiayaan/piutang syariah (lanjutan)

Allowance for impairment losses on loans and sharia financing/receivables (continued)

Respons audit: (lanjutan)

Audit response: (continued)

Untuk cadangan kerugian penurunan nilai yang dinilai secara individual, kami menguji sampel kredit yang diberikan dan pembiayaan/piutang syariah untuk mengevaluasi identifikasi secara tepat waktu oleh Bank atas eksposur yang mengalami penurunan kualitas kredit yang signifikan atau yang telah mengalami penurunan nilai; untuk kasus-kasus di mana penurunan nilai telah diidentifikasi, kami menilai asumsi Bank atas arus kas masa depan ekspektasian, termasuk nilai agunan yang dapat direalisasikan berdasarkan informasi pasar yang tersedia atau penilaian yang dilakukan oleh penilai independen. Kami juga memeriksa keakurasian perhitungan jumlah cadangan kerugian penurunan nilai dengan melakukan perhitungan ulang berdasarkan sampel, menilai apakah pengungkapan di laporan keuangan cukup dan secara memadai mencerminkan eksposur Bank terhadap risiko kredit, dan melibatkan pakar auditor internal kami untuk membantu kami dalam melakukan prosedur-prosedur di atas ketika keahlian spesifik mereka diperlukan.

With respect to individually assessed allowance for impairment losses, we tested a sample of loans and sharia financing/receivables to evaluate the timely identification by the Bank of exposures with significant deterioration in credit quality or those which have been impaired; for cases where impairment has been identified, assessed the Bank's assumptions on the expected future cash flows, including the value of realizable collateral based on available market information or valuation prepared by independent valuer. We also checked the accuracy of the calculation of the allowance for impairment losses amount by recalculating the collective impairment assessment for the entire portfolio and recalculating the individual impairment assessment on a sample basis, assessed whether the financial statement disclosures are adequately and appropriately reflecting the Bank's exposures to credit risk, and involved our auditor's internal expert to assist us in the performance of the above procedures where their specific expertise was required.

Informasi lain

Other information

Manajemen bertanggung jawab atas informasi lain. Informasi lain terdiri dari informasi yang tercantum dalam Laporan Tahunan selain laporan keuangan terlampir dan laporan auditor independen kami. Laporan Tahunan diharapkan akan tersedia bagi kami setelah tanggal laporan auditor independen ini.

Management is responsible for the other information. Other information comprises the information included in 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.

Laporan Auditor Independen (lanjutan)

Laporan No. 00046/2.1032/AU.1/07/1681-2/1/II/2025 (lanjutan)

Independent Auditor's Report (continued)

Report No. 00046/2.1032/AU.1/07/1681-2/1/II/2025 (continued)

Informasi lain (lanjutan)

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 mengkomunikasikan hal tersebut kepada pihak yang bertanggung jawab atas tata kelola dan melakukan tindakan yang tepat berdasarkan peraturan perundang-undangan yang berlaku.

Other information (continued)

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.

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.

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.

Laporan Auditor Independen (lanjutan)

Laporan No. 00046/2.1032/AU.1/07/1681-2/1/II/2025 (lanjutan)

Independent Auditor's Report (continued)

Report No. 00046/2.1032/AU.1/07/1681-2/1/II/2025 (continued)

Tanggung jawab manajemen dan pihak yang bertanggung jawab atas tata kelola terhadap laporan keuangan (lanjutan)

Responsibilities of management and those charged with governance for the financial statements (continued)

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.

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.

Pihak yang bertanggung jawab atas tata kelola bertanggung jawab untuk mengawasi proses pelaporan keuangan Bank.

Those charged with governance are responsible for overseeing the Bank's financial reporting process.

Tanggung jawab auditor terhadap audit atas laporan keuangan

Auditor's responsibilities for the audit of the financial statements

Tujuan kami adalah untuk memperoleh 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 mempengaruhi keputusan ekonomi yang diambil oleh pengguna berdasarkan laporan keuangan tersebut.

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.

Laporan Auditor Independen (lanjutan)

Laporan No. 00046/2.1032/AU.1/07/1681-2/1/II/2025 (lanjutan)

Independent Auditor's Report (continued)

Report No. 00046/2.1032/AU.1/07/1681-2/1/II/2025 (continued)

Tanggung jawab auditor terhadap audit atas laporan keuangan (lanjutan)

Auditor's responsibilities for the audit of the financial statements (continued)

Sebagai bagian dari suatu audit berdasarkan Standar Audit yang ditetapkan oleh IAPI, kami menerapkan pertimbangan profesional dan mempertahankan skeptisisme profesional selama audit. Kami juga:

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:

- 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 memperoleh 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 daripada yang disebabkan oleh kesalahan, karena kecurangan dapat melibatkan kolusi, pemalsuan, penghilangan secara sengaja, pernyataan salah, atau pengabaian pengendalian internal.

- *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 the override of internal control.*

- 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.

- *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.*

- Mengevaluasi ketepatan kebijakan akuntansi yang digunakan serta kewajaran estimasi akuntansi dan pengungkapan terkait yang dibuat oleh manajemen.

- *Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.*

Laporan Auditor Independen (lanjutan)

Laporan No. 00046/2.1032/AU.1/07/1681-2/1/II/2025 (lanjutan)

Independent Auditor's Report (continued)

Report No. 00046/2.1032/AU.1/07/1681-2/1/II/2025 (continued)

Tanggung jawab auditor terhadap audit atas laporan keuangan (lanjutan)

Auditor's responsibilities for the audit of the financial statements (continued)

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)

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)

- 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 Bank tidak dapat mempertahankan kelangsungan usahanya.

- *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.*

- 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.

- *Evaluate the overall presentation, structure, and contents 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.*

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.

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.

Laporan Auditor Independen (lanjutan)

Laporan No. 00046/2.1032/AU.1/07/1681-2/1/II/2025 (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. 00046/2.1032/AU.1/07/1681-2/1/II/2025 (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 regulation preclude public disclosure about such key audit matter 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

Christopherus Alvin Kossim
Registrasi Akuntan Publik No. AP.1681/*Public Accountant Registration No. AP.1681*

12 Februari 2025/*February 12, 2025*

PT BANK TABUNGAN NEGARA (PERSERO) TBK
LAPORAN POSISI KEUANGAN
Tanggal 31 Desember 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

PT BANK TABUNGAN NEGARA (PERSERO) TBK
STATEMENT OF FINANCIAL POSITION
As of December 31, 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	31 Desember 2024/ *December 31, 2024*	31 Desember 2023/ *December 31, 2023*	31 Desember 2022/ *December 31, 2022*	
ASET					***ASSETS***
KAS	2a,2d,4	2.105.620	2.127.489	1.661.533	***CASH***
GIRO PADA BANK INDONESIA	2a,2d, 2f,5	22.739.920	18.145.761	25.416.941	***CURRENT ACCOUNTS WITH BANK INDONESIA***
GIRO PADA BANK LAIN	2a,2c				***CURRENT ACCOUNTS WITH OTHER BANKS***
Pihak ketiga	2d,2e,2f	886.415	1.153.949	963.935	*Third parties*
Pihak berelasi	6,44	5.065.331	1.049.449	508.322	*Related parties*
		5.951.746	2.203.398	1.472.257	
Cadangan kerugian penurunan nilai		(2.571)	(1.804)	(1.747)	*Allowance for impairment losses*
		5.949.175	2.201.594	1.470.510	
PENEMPATAN PADA BANK INDONESIA DAN BANK LAIN	2a,2c 2d,2g,7,44				***PLACEMENTS WITH BANK INDONESIA AND OTHER BANKS***
Pihak ketiga		4.661.043	30.561.061	12.975.894	*Third parties*
Pihak berelasi		61	61	61	*Related parties*
		4.661.104	30.561.122	12.975.955	
EFEK-EFEK	2a,2c,				***SECURITIES***
Pihak ketiga	2d,2e,2h,	19.874.205	1.454.768	873.109	*Third parties*
Pihak berelasi	8,44	5.489.205	3.851.105	850.059	*Related parties*
		25.363.410	5.305.873	1.723.168	
Cadangan kerugian penurunan nilai		(787)	(22.903)	(2.399)	*Allowance for impairment losses*
		25.362.623	5.282.970	1.720.769	
OBLIGASI PEMERINTAH	2a,2c,				***GOVERNMENT BONDS***
Pihak berelasi	2d,2h,9,44	35.475.529	35.893.929	51.964.973	*Related parties*
EFEK-EFEK YANG DIBELI DENGAN JANJI DIJUAL KEMBALI	2d 2e, 2t,10				***SECURITIES PURCHASED UNDER AGREEMENT TO RESELL***
Pihak ketiga		175.625	-	1.434.190	*Third parties*

Catatan atas laporan keuangan terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan secara keseluruhan.

The accompanying notes to the financial statements form an integral part of these financial statements taken as a whole.

PT BANK TABUNGAN NEGARA (PERSERO) TBK
LAPORAN POSISI KEUANGAN (lanjutan)
Tanggal 31 Desember 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

PT BANK TABUNGAN NEGARA (PERSERO) TBK
STATEMENT OF FINANCIAL POSITION (continued)
As of December 31, 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	31 Desember 2024/ *December 31, 2024*	31 Desember 2023/ *December 31, 2023*	31 Desember 2022/ *December 31, 2022*	
ASET (lanjutan)					***ASSETS (continued)***
KREDIT YANG DIBERIKAN DAN PEMBIAYAAN/ PIUTANG SYARIAH	2c,2d,2e, 2i,2j,11,44				***LOANS AND SHARIA FINANCING/RECEIVABLES***
Kredit yang diberikan					*Loans*
Pihak ketiga		286.144.106	268.898.377	247.217.823	*Third parties*
Pihak berelasi		27.935.999	27.685.483	19.439.742	*Related parties*
		314.080.105	296.583.860	266.657.565	
Cadangan kerugian penurunan nilai		(11.727.934)	(14.191.536)	(14.104.914)	*Allowance for impairment losses*
		302.352.171	282.392.324	252.552.651	
Pembiayaan/piutang syariah					*Sharia financing/receivables*
Pihak ketiga		43.681.345	37.027.078	31.367.082	*Third parties*
Pihak berelasi		211.482	87.203	257.057	*Related parties*
		43.892.827	37.114.281	31.624.139	
Cadangan kerugian penurunan nilai		(1.329.253)	(1.400.428)	(1.570.009)	*Allowance for impairment losses*
		42.563.574	35.713.853	30.054.130	
		344.915.745	318.106.177	282.606.781	
TAGIHAN DERIVATIF	2d				***DERIVATIVE RECEIVABLES***
Pihak ketiga	2am,12	102.843	32.176	103.939	*Third parties*
TAGIHAN AKSEPTASI	2c,2d,2e				***ACCEPTANCES RECEIVABLES***
Pihak ketiga	2k,13,44	508.190	475.821	289.206	*Third parties*
Pihak berelasi		433.708	68.746	131.356	*Related parties*
		941.898	544.567	420.562	
Cadangan kerugian penurunan nilai		(1.987)	(23.876)	(136)	*Allowance for impairment losses*
		939.911	520.691	420.426	
ASET TETAP	2m,2n,				***PREMISES AND EQUIPMENT***
Biaya perolehan/nilai revaluasi	14,35	14.059.957	12.953.746	10.599.848	*Cost/revaluation value*
Akumulasi penyusutan		(4.883.826)	(4.835.934)	(4.246.045)	*Accumulated depreciation*
		9.176.131	8.117.812	6.353.803	
BUNGA YANG MASIH AKAN DITERIMA	2d,15	11.518.574	11.526.687	10.750.302	***INTEREST RECEIVABLES***
ASET PAJAK TANGGUHAN - NETO	2af,39	2.286.038	2.998.282	2.915.428	***DEFERRED TAX ASSETS - NET***
ASET LAIN-LAIN	2d,2n,2p 2q,2am,16	4.205.664	3.235.046	2.352.762	***OTHER ASSETS***
TOTAL ASET		**469.614.502**	**438.749.736**	**402.148.312**	***TOTAL ASSETS***

Catatan atas laporan keuangan terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan secara keseluruhan.

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PT BANK TABUNGAN NEGARA (PERSERO) TBK
LAPORAN POSISI KEUANGAN (lanjutan)
Tanggal 31 Desember 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

PT BANK TABUNGAN NEGARA (PERSERO) TBK
STATEMENT OF FINANCIAL POSITION (continued)
As of December 31, 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	31 Desember 2024/ *December 31, 2024*	31 Desember 2023/ *December 31, 2023*	31 Desember 2022/ *December 31, 2022*	
LIABILITAS, DANA SYIRKAH TEMPORER DAN EKUITAS					***LIABILITIES, TEMPORARY SYIRKAH FUNDS AND EQUITY***
LIABILITAS					***LIABILITIES***
LIABILITAS SEGERA	2d,2r,17	2.644.422	3.277.514	3.205.358	***LIABILITIES DUE IMMEDIATELY***
SIMPANAN DARI NASABAH	2c,2d,2s,44				***DEPOSITS FROM CUSTOMERS***
Giro	18				*Demand deposits*
Pihak ketiga		19.418.767	20.957.283	17.636.481	*Third parties*
Pihak berelasi		121.604.495	108.412.008	87.264.437	*Related parties*
		141.023.262	129.369.291	104.900.918	
Giro Wadiah	18				*Wadiah demand deposits*
Pihak ketiga		2.255.148	2.402.428	1.783.134	*Third parties*
Pihak berelasi		16.627.618	11.037.037	6.841.675	*Related parties*
		18.882.766	13.439.465	8.624.809	
		159.906.028	142.808.756	113.525.727	
Tabungan	19				*Saving deposits*
Pihak ketiga		36.777.689	37.029.999	35.656.990	*Third parties*
Pihak berelasi		922.460	692.162	525.339	*Related parties*
		37.700.149	37.722.161	36.182.329	
Tabungan Wadiah	19				*Wadiah saving deposits*
Pihak ketiga		1.520.491	1.274.456	1.192.775	*Third parties*
Pihak berelasi		1.441	2.136	943	*Related parties*
		1.521.932	1.276.592	1.193.718	
		39.222.081	38.998.753	37.376.047	
Deposito berjangka	20				*Time deposits*
Pihak ketiga		76.672.689	63.976.056	66.808.185	*Third parties*
Pihak berelasi		76.636.682	76.717.583	79.389.842	*Related parties*
		153.309.371	140.693.639	146.198.027	
Total simpanan dari nasabah		352.437.480	322.501.148	297.099.801	*Total deposits from customers*

Catatan atas laporan keuangan terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan secara keseluruhan.

The accompanying notes to the financial statements form an integral part of these financial statements taken as a whole.

PT BANK TABUNGAN NEGARA (PERSERO) TBK
LAPORAN POSISI KEUANGAN (lanjutan)
Tanggal 31 Desember 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

PT BANK TABUNGAN NEGARA (PERSERO) TBK
STATEMENT OF FINANCIAL POSITION (continued)
As of December 31, 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	31 Desember 2024/ *December 31, 2024*	31 Desember 2023/ *December 31, 2023*	31 Desember 2022/ *December 31, 2022*	
LIABILITAS, DANA SYIRKAH TEMPORER DAN EKUITAS (lanjutan)					***LIABILITIES, TEMPORARY SYIRKAH FUNDS AND EQUITY (continued)***
SIMPANAN DARI BANK LAIN	2d,2t,				***DEPOSITS FROM OTHER BANKS***
Pihak ketiga	21	70.035	91.312	136.408	*Third parties*
EFEK-EFEK YANG DIJUAL DENGAN JANJI DIBELI KEMBALI	2d,2u, 22				***SECURITIES SELL UNDER AGREEMENT TO REPURCHASED***
Pihak ketiga		2.446.384	-	-	*Third parties*
Pihak berelasi		963.042	-	-	*Related parties*
		3.409.426	-	-	
LIABILITAS AKSEPTASI	2c,2d,2k				***ACCEPTANCES PAYABLE***
Pihak ketiga	23,44	251.423	320.522	302.037	*Third parties*
Pihak berelasi		690.475	224.045	118.525	*Related parties*
		941.898	544.567	420.562	
SURAT-SURAT BERHARGA YANG DITERBITKAN	1c,2c, 2d,				***SECURITIES ISSUED***
Pihak ketiga	2v,24,44	844.058	2.403.573	4.297.252	*Third parties*
Pihak berelasi		4.600.466	5.868.525	4.355.008	*Related parties*
		5.444.524	8.272.098	8.652.260	
PINJAMAN YANG DITERIMA	2c,2d,2w,				***FUND BORROWINGS***
Pihak ketiga	25,44	10.132.859	11.308.799	7.365.320	*Third parties*
Pihak berelasi		23.352.225	22.453.290	17.455.685	*Related parties*
		33.485.084	33.762.089	24.821.005	
BUNGA YANG MASIH HARUS DIBAYAR	2d,27	658.070	647.496	629.366	***INTEREST PAYABLE***
ESTIMASI KERUGIAN KOMITMEN DAN KONTINJENSI	2c,2d,2af 28,40,44	3.385	3.580	4.719	***ESTIMATED LOSSES ON COMMITMENTS AND CONTINGENCIES***
LIABILITAS IMBALAN KERJA DAN LAIN-LAIN	2c,2d,2ae 29,42,44	2.372.168	2.951.848	7.248.985	***EMPLOYEE BENEFITS AND OTHER LIABILITIES***
PINJAMAN SUBORDINASI DAN EFEK-EFEK SUBORDINASI	2c,2d,2x 26,44				***SUBORDINATED LOAN AND SECURITIES***
Pihak ketiga		4.828.105	4.612.840	4.658.242	*Third parties*
Pihak berelasi		1.500.000	4.499.997	4.499.977	*Related parties*
		6.328.105	9.112.837	9.158.219	
TOTAL LIABILITAS		**407.794.597**	**381.164.489**	**351.376.683**	***TOTAL LIABILITIES***

Catatan atas laporan keuangan terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan secara keseluruhan.

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PT BANK TABUNGAN NEGARA (PERSERO) TBK
LAPORAN POSISI KEUANGAN (lanjutan)
Tanggal 31 Desember 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

PT BANK TABUNGAN NEGARA (PERSERO) TBK
STATEMENT OF FINANCIAL POSITION (continued)
As of December 31, 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	31 Desember 2024/ *December 31, 2024*	31 Desember 2023/ *December 31, 2023*	31 Desember 2022/ *December 31, 2022*	
LIABILITAS, DANA SYIRKAH TEMPORER DAN EKUITAS (lanjutan)					***LIABILITIES, TEMPORARY SYIRKAH FUNDS AND EQUITY (continued)***
DANA SYIRKAH TEMPORER					***TEMPORARY SYIRKAH FUNDS***
SIMPANAN NASABAH	2c,2d,2aa				***DEPOSITS FROM CUSTOMERS***
Giro Mudharabah	44,18				*Mudharabah current accounts*
Pihak ketiga		929.940	712.587	468.889	*Third parties*
Pihak berelasi		11.985	13.474	11.897	*Related parties*
		941.925	726.061	480.786	
Tabungan Mudharabah	19				*Mudharabah saving deposits*
Pihak ketiga		6.161.887	5.331.249	4.730.686	*Third parties*
Pihak berelasi		125.893	141.993	88.427	*Related parties*
		6.287.780	5.473.242	4.819.113	
Deposito berjangka Mudharabah	20				*Mudharabah time deposits*
Pihak ketiga		15.129.659	11.975.188	11.886.366	*Third parties*
Pihak berelasi		6.857.408	8.908.369	7.637.191	*Related parties*
		21.987.067	20.883.557	19.523.557	
Total simpanan nasabah		29.216.772	27.082.860	24.823.456	*Total deposits from customers*
SIMPANAN DARI BANK LAIN	2d,2aa				***DEPOSITS FROM OTHER BANKS***
Giro Mudharabah	21				*Mudharabah current accounts*
Pihak ketiga		9.214	4.154	56	*Third parties*
Tabungan Mudharabah	21				*Mudharabah saving deposits*
Pihak ketiga		21.730	14.781	19.674	*Third parties*
Deposito berjangka Mudharabah	21				*Mudharabah time deposits*
Pihak ketiga		300	4.300	19.089	*Third parties*
Total simpanan dari bank lain		31.244	23.235	38.819	*Total deposits from other banks*
TOTAL DANA SYIRKAH TEMPORER		**29.248.016**	**27.106.095**	**24.862.275**	***TOTAL TEMPORARY SYIRKAH FUNDS***

Catatan atas laporan keuangan terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan secara keseluruhan.

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PT BANK TABUNGAN NEGARA (PERSERO) TBK
LAPORAN POSISI KEUANGAN (lanjutan)
Tanggal 31 Desember 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

PT BANK TABUNGAN NEGARA (PERSERO) TBK
STATEMENT OF FINANCIAL POSITION (continued)
As of December 31, 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	31 Desember 2024/ *December 31, 2024*	31 Desember 2023/ *December 31, 2023*	31 Desember 2022/ *December 31, 2022*	
LIABILITAS, DANA SYIRKAH TEMPORER DAN EKUITAS (lanjutan)					***LIABILITIES, TEMPORARY SYIRKAH FUNDS AND EQUITY (continued)***
EKUITAS					***EQUITY***
Modal saham - nominal Rp500 (Rupiah penuh) per saham masing-masing pada tanggal 31 Desember 2024, 2023 dan 2022					*Capital stock - Rp500 par value per share (full amount) as of December 31, 2024, 2023 and 2022, respectively*
Modal dasar 20.478.432.000 saham (nilai penuh) (terdiri dari 1 lembar saham seri A Dwiwarna dan 20.478.431.999 lembar saham seri B) masing-masing pada tanggal 31 Desember 2024, 2023 dan 2022					*Authorized capital 20,478,432,000 shares (full amount) (consisting of 1 share of Series A Dwiwarna and 20,478,431,999 shares of series B) as of December 31, 2024, 2023 and 2022, respectively*
Modal ditempatkan dan disetor penuh 14.034.444.413 saham (nilai penuh) (terdiri dari 1 lembar saham seri A Dwiwarna dan 14.034.444.412 lembar Saham seri B) masing-masing pada tanggal 31 Desember 2024, dam 2023 dan 10.590.000.000 saham (nilai penuh) (terdiri dari 1 lembar saham seri A Dwiwarna dan 10.589.999.999 lembar Saham seri B) pada tanggal 31 Desember 2022	2y,30a	7.017.222	7.017.222	5.295.000	*Issued and fully paid capital 14,034,444,413 shares (full amount) (consisting of 1 share of series A Dwiwarna and 14,034,444,412 shares of series B) as of December 31, 2024, and 2023 and 10.590.000.000 shares (full amount) (consisting of 1 share of series A Dwiwarna and 10.589.999.999 shares of series B) as of December 31, 2022*
Tambahan modal disetor	30b	4.418.900	4.418.900	2.054.454	*Additonal paid-in capital*
Dana setoran modal	30d	-	-	2.756.575	*Capital deposit fund*
Kerugian neto yang belum direalisasi dan cadangan kerugian penurunan nilai atas efek-efek dan obligasi pemerintah diukur pada nilai wajar melalui penghasilan komprehensif lain-setelah pajak tangguhan	2h	(1.107.982)	(769.001)	(1.193.252)	*Net unrealized loss allowance for and impairment losses on securities and government at fair value through other comprehensive income net of deferred tax*
Pengukuran kembali program imbalan pasti - setelah pajak tangguhan	2ae	(424.015)	(560.339)	(409.657)	*Remeasurement of defined benefit plan - net of deferred tax*
Bagian efektif lindung nilai arus kas	2an,12	(44.082)	(32.346)	(49.301)	*Effective portion of cash flow hedge*
Surplus revaluasi aset tetap	2m,14	3.565.773	3.565.773	3.508.565	*Revaluation surplus of premises and equipment*
Saldo laba*)					*Retained earnings**)
Telah ditentukan penggunaannya		15.982.004	13.181.214	10.745.157	*Appropriated*
Belum ditentukan penggunaannya	2b,2z	3.164.069	3.657.729	3.201.813	*Unappropriated*
TOTAL EKUITAS		**32.571.889**	**30.479.152**	**25.909.354**	***TOTAL EQUITY***
TOTAL LIABILITAS, DANA SYIRKAH TEMPORER DAN EKUITAS		**469.614.502**	**438.749.736**	**402.148.312**	***TOTAL LIABILITIES, TEMPORARY SYIRKAH FUNDS AND EQUITY***

*) Saldo defisit sebesar Rp14.226.290 telah dieliminasi akibat kuasi-reorganisasi pada tanggal 31 Mei 2007.

*) *Accumulated losses amounted to Rp14,226,290 was eliminated as a result of quasireorganization on May 31, 2007.*

Catatan atas laporan keuangan terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan secara keseluruhan.

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PT BANK TABUNGAN NEGARA (PERSERO) TBK
LAPORAN LABA RUGI DAN PENGHASILAN KOMPREHENSIF LAIN
Untuk Tahun yang Berakhir Pada Tanggal 31 Desember 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

PT BANK TABUNGAN NEGARA (PERSERO) TBK
STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME
For the Year Ended December 31, 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	Tahun yang Berakhir pada Tanggal 31 Desember/ *Year Ended December 31,* 2024	2023	2022	
PENDAPATAN DAN BEBAN OPERASIONAL					***INCOME AND EXPENSES FROM OPERATIONS***
Pendapatan Bunga dan Bagi Hasil	2ab,2ac				*Interest Income and Income from Profit Sharing*
Bunga	31a	25.472.625	24.722.529	23.233.200	*Interest*
Bagi hasil dan marjin unit syariah	2ad,31b	4.068.967	3.558.723	2.674.168	*Profit sharing and margin from sharia unit*
Total Pendapatan Bunga dan Bagi Hasil		29.541.592	28.281.252	25.907.368	*Total Interest Income and Income from Profit Sharing*
Beban Bunga, Bagi Hasil dan Bonus					*Interest, Profit Sharing and Bonus Expenses*
Bunga	2ab,32a	(15.913.459)	(13.203.108)	(9.866.919)	*Interest*
Beban pendanaan lainnya		(200.476)	(203.317)	(169.804)	*Other financing expenses*
Bonus simpanan *Wadiah*	2ad,32b	(153.446)	(71.621)	(57.558)	*Wadiah Bonus*
Hak pihak ketiga atas bagi hasil *Mudharabah*	2ad,32b	(1.781.559)	(1.372.916)	(815.803)	*Third parties' share on return of Mudharabah*
Total Beban Bunga, Bagi Hasil dan Bonus		(18.048.940)	(14.850.962)	(10.910.084)	*Total Interest, Profit Sharing and Bonus Expenses*
Pendapatan Bunga dan Bagi Hasil - Neto		11.492.652	13.430.290	14.997.284	*Interest Income and Income from Profit Sharing - Net*
Pendapatan Operasional Lainnya					*Other Operating Income*
Pungutan administrasi dan denda atas simpanan dan kredit yang diberikan		1.072.304	1.096.346	965.441	*Administration fees and penalties on deposits and loans*
Pendapatan dari penerimaan kredit yang dihapusbukukan		1.338.753	934.191	431.591	*Income from recovery of loans written-off*
Keuntungan dari penjualan efek-efek - neto	2h,8	932.900	6.669	-	*Gain on sale of securities - net*
Keuntungan dari penjualan obligasi pemerintah - neto	2h,9	49.049	541.392	-	*Gain on sale of government bonds – net*
Keuntungan yang belum direalisasi dari perubahan nilai wajar efek-efek - neto	2h,8	30.175	1.802	-	*Unrealized gain on changes in fair value of securities - net*
Keuntungan yang belum direalisasi dari perubahan nilai wajar obligasi pemerintah - neto	2h,9	-	-	55.045	*Unrealized gain on changes in fair value of bonds - net*
Lain-lain	33	1.152.738	1.310.747	822.775	*Others*
Total Pendapatan Operasional Lainnya		4.575.919	3.891.147	2.274.852	*Total Other Operating Income*
Penyisihan Kerugian Penurunan Nilai Aset Keuangan dan Aset Non Keuangan	2d,2p,34	(1.981.495)	(3.765.397)	(4.017.378)	*Provision for Impairment Losses on Financial and Non-financial Assets*
(Penyisihan) pembalikan Estimasi Kerugian Penurunan Nilai Komitmen dan Kontinjensi	28	195	1.139	(1.075)	*(Provision for) reversal of Estimated losses on Comitment and Contingencies*

Catatan atas laporan keuangan terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan secara keseluruhan.

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PT BANK TABUNGAN NEGARA (PERSERO) TBK
LAPORAN LABA RUGI DAN PENGHASILAN KOMPREHENSIF LAIN (lanjutan)
Untuk Tahun yang Berakhir Pada Tanggal 31 Desember 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

PT BANK TABUNGAN NEGARA (PERSERO) TBK
STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME (continued)
For the Year Ended December 31, 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	Tahun yang Berakhir pada Tanggal 31 Desember/ *Year Ended December 31,* 2024	2023	2022	
PENDAPATAN DAN BEBAN OPERASIONAL (lanjutan)					***INCOME AND EXPENSES FROM OPERATIONS (continued)***
Beban Operasional Lainnya					*Other Operating Expenses*
Umum dan administrasi	35	(4.456.861)	(3.884.779)	(3.754.028)	*General and administrative*
Gaji karyawan	2ae,2c,36,44	(4.445.575)	(3.982.503)	(4.190.298)	*Salaries and employee benefits*
Premi program penjaminan pemerintah	43	(729.685)	(656.774)	(599.991)	*Premium on government's guarantee program*
Kerugian yang belum direalisasi dari perubahan nilai wajar obligasi pemerintah - neto	2h,9	(40.444)	(5.780)	-	*Unrealized losses on changes in fair value of government bonds - net*
Kerugian dari penjualan obligasi pemerintah - neto	2h,9	-	-	(266.235)	*Loss on sale of government bonds - net*
Kerugian dari penjualan Efek-efek - neto	2h,8	-	-	(234.089)	*Loss on sale of government securities - net*
Kerugian yang belum direalisasi dari perubahan nilai wajar efek-efek - neto	2h,8	-	-	(64.931)	*Unrealized losses on changes in fair value of securities - net*
Lain-lain	37	(589.993)	(487.614)	(329.308)	*Others*
Total Beban Operasional Lainnya		(10.262.558)	(9.017.450)	(9.438.880)	*Total Other Operating Expenses*
LABA OPERASIONAL		**3.824.713**	**4.539.729**	**3.814.803**	***INCOME FROM OPERATIONS***
PENDAPATAN (BEBAN) BUKAN OPERASIONAL - NETO	**38**	**(51.872)**	**(159.519)**	**60.887**	***NON-OPERATING INCOME (EXPENSES) - NET***
LABA SEBELUM BEBAN PAJAK		**3.772.841**	**4.380.210**	**3.875.690**	***INCOME BEFORE TAX EXPENSE***
BEBAN PAJAK	**2ag,39**	**(765.513)**	**(879.222)**	**(830.617)**	***TAX EXPENSE***
LABA TAHUN BERJALAN		**3.007.328**	**3.500.988**	**3.045.073**	***INCOME FOR THE YEAR***
Penghasilan Komprehensif Lain:					*Other Comprehensive Income:*
Akun-akun yang tidak akan direklasifikasi ke laba rugi					*Items that will not be reclassified to profit or loss*
Surplus revaluasi aset tetap	2m,14	-	57.208	200.574	*Surplus revaluation of fixed asset*
Pengukuran kembali program imbalan pasti	2ae,41	168.301	(186.027)	59.872	*Remeasurement of defined benefit plan*
Pajak penghasilan terkait akun-akun yang tidak akan direklasifikasi ke laba rugi	39c	(31.977)	35.345	(11.376)	*Income tax related to items that will not be reclassified to profit or loss*
Akun-akun yang akan direklasifikasi ke laba rugi					*Items that will be reclassified to profit or loss*
Bagian efektif lindung nilai arus kas		(14.490)	20.932	(40.883)	*Effective part of hedging-cash flow*
Keuntungan (kerugian) neto yang belum direalisasi atas perubahan nilai efek-efek dan obligasi pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain	2h,8,9	(421.538)	517.528	(1.576.967)	*Net unrealized gain (loss) on changes in value of fair value through other comprehensive income securities and government bonds*

Catatan atas laporan keuangan terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan secara keseluruhan.

The accompanying notes to the financial statements form an integral part of these financial statements taken as a whole.

PT BANK TABUNGAN NEGARA (PERSERO) TBK
LAPORAN LABA RUGI DAN PENGHASILAN KOMPREHENSIF LAIN (lanjutan)
Untuk Tahun yang Berakhir Pada Tanggal 31 Desember 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

PT BANK TABUNGAN NEGARA (PERSERO) TBK
STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME (continued)
For the Year Ended December 31, 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	Tahun yang Berakhir pada Tanggal 31 Desember/ *Year Ended December 31,* 2024	2023	2022	
Penghasilan Komprehensif Lain: (lanjutan)					*Other Comprehensive Income: (continued)*
Akun-akun yang akan direklasifikasi ke laba rugi (lanjutan)					*Items that will be reclassified to profit or loss (continued)*
Pajak penghasilan terkait akun-akun yang akan direklasifikasi ke laba rugi		85.311	(97.254)	307.463	*Income tax related to items that will be reclassified to profit or loss*
Total Laba Komprehensif Tahun Berjalan		2.792.935	3.848.720	1.983.756	*Total Comprehensive Income for the Year*
LABA PER SAHAM					***EARNINGS PER SHARE***
Dasar (nilai penuh)	**2ai,47**	**214**	**249**	**288**	*Basic (full amount)*

Catatan atas laporan keuangan terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan secara keseluruhan.

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PT BANK TABUNGAN NEGARA (PERSERO) TBK
LAPORAN PERUBAHAN EKUITAS
Untuk Tahun yang Berakhir Pada Tanggal 31 Desember 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

PT BANK TABUNGAN NEGARA (PERSERO) TBK
STATEMENT OF CHANGES IN EQUITY
For the Years Ended December 31, 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	Modal Ditempatkan dan Disetor Penuh/ *Issued and Fully Paid Capital Stock*	Tambahan Modal disetor/ *Additional Paid-in Capital*	Dana Setoran Modal/ *Deposit capital fund*	Keuntungan (Kerugian) yang Belum Direalisasi dan Cadangan kerugian penurunan nilai atas Efek efek dan Obligasi Pemerintah yang Diukur pada nilai wajar melalui penghasilan komprehensif lain-Neto/ *Unrealized Gain (Loss) and allowance for impairment losses on FVTOCI Securities and Government Bonds - Net*	Pengukuran Kembali Program Imbalan Pasti - Neto/ *Remeasurement of Defined Benefit Plan - Net*	Surplus Revaluasi Aset Tetap/ *Revaluation Surplus of Premises and Equipment*	Bagian Efektif Lindung Nilai Arus Kas/ *Effective Portion of Cash Flow Hedges*	Saldo Laba/ *Retained Earnings**)		Ekuitas/ *Equity*	
									Telah Ditentukan Penggunaannya/ *Appropriated*	Belum Ditentukan Penggunaannya/ *Unappropriated*		
Saldo per 31 Desember 2021		**5.295.000**	**2.054.454**	**-**	**87.817**	**(458.153)**	**3.307.991**	**(19.983)**	**8.606.555**	**2.532.966**	**21.406.647**	***Balance as of December 31, 2021***
Total Laba (Rugi) komprehensif tahun berjalan	2h,8 9,12,41	-	-	-	(1.281.069)	48.496	200.574	(29.318)	-	3.045.073	1.983.756	*Total comprehensive income (loss) for the year*
Dana setoran modal	30d	-	-	2.756.575	-	-	-	-	-	-	2.756.575	*Capital deposit fund*
Dividen	30c	-	-	-	-	-	-	-	-	(237.624)	(237.624)	*Dividend*
Pembentukan cadangan umum dan cadangan tujuan	30c	-	-	-	-	-	-	-	2.138.602	(2.138.602)	-	*Appropriation for general and special reserves*
Saldo per 31 Desember 2022		**5.295.000**	**2.054.454**	**2.756.575**	**(1.193.252)**	**(409.657)**	**3.508.565**	**(49.301)**	**10.745.157**	**3.201.813**	**25.909.354**	***Balance as of December 31, 2022***

*) Saldo defisit sebesar Rp14.226.290 telah dieliminasi akibat kuasi-reorganisasi pada tanggal 31 Mei 2007.

**) Accumulated losses amounted to Rp14,226,290 had been eliminated as a result of quasi-reorganization as of May 31, 2007.*

Catatan atas laporan keuangan terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan secara keseluruhan.

The accompanying notes to the financial statements form an integral part of these financial statements taken as a whole.

PT BANK TABUNGAN NEGARA (PERSERO) TBK
LAPORAN PERUBAHAN EKUITAS (lanjutan)
Untuk Tahun yang Berakhir Pada Tanggal 31 Desember 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

PT BANK TABUNGAN NEGARA (PERSERO) TBK
STATEMENT OF CHANGES IN EQUITY (continued)
For the Year Ended December 31, 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	Modal Ditempatkan dan Disetor Penuh/ *Issued and Fully Paid Capital Stock*	Tambahan Modal disetor/ *Additional Paid-in Capital*	Dana Setoran Modal/ *Deposit capital fund*	Keuntungan (Kerugian) yang Belum Direalisasi dan Cadangan kerugian penurunan nilai atas Efek efek dan Obligasi Pemerintah yang Diukur pada nilai wajar melalui penghasilan komprehensif lain-Neto/ *Unrealized Gain (Loss) and allowance for impairment losses on FVTOCI Securities and Government Bonds - Net*	Pengukuran Kembali Program Imbalan Pasti - Neto/ *Remeasurement of Defined Benefit Plan - Net*	Surplus Revaluasi Aset Tetap/ *Revaluation Surplus of Premises and Equipment*	Bagian Efektif Lindung Nilai Arus Kas/ *Effective Portion of Cash Flow Hedges*	Saldo Laba/ *Retained Earnings**)		Ekuitas/ *Equity*	
									Telah Ditentukan Penggunaannya/ *Appropriated*	Belum Ditentukan Penggunaannya/ *Unappropriated*		
Saldo per 31 Desember 2022		**5.295.000**	**2.054.454**	**2.756.575**	**(1.193.252)**	**(409.657)**	**3.508.565**	**(49.301)**	**10.745.157**	**3.201.813**	**25.909.354**	***Balance as of December 31, 2022***
Total Laba (Rugi) komprehensif tahun berjalan	2h,8 9,12,41	-	-	-	424.251	(150.682)	57.208	16.955	-	3.500.988	3.848.720	*Total comprehensive income (loss) for the year*
Penerbitan saham		1.722.222	2.364.446	-	-	-	-	-	-	-	4.086.668	*Shares issuance*
Dana setoran modal	30d	-	-	(2.756.575)	-	-	-	-	-	-	(2.756.575)	*Capital deposit fund*
Dividen	30c	-	-	-	-	-	-	-	-	(609.015)	(609.015)	*Dividend*
Pembentukan cadangan umum dan cadangan tujuan	30c	-	-	-	-	-	-	-	2.436.057	(2.436.057)	-	*Appropriation for general and special reserves*
Saldo per 31 Desember 2023		**7.017.222**	**4.418.900**	**-**	**(769.001)**	**(560.339)**	**3.565.773**	**(32.346)**	**13.181.214**	**3.657.729**	**30.479.152**	***Balance as of December 31, 2023***

Catatan atas laporan keuangan terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan secara keseluruhan.

The accompanying notes to the financial statements form an integral part of these financial statements taken as a whole.

PT BANK TABUNGAN NEGARA (PERSERO) TBK
LAPORAN PERUBAHAN EKUITAS (lanjutan)
Untuk Tahun yang Berakhir Pada Tanggal 31 Desember 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

PT BANK TABUNGAN NEGARA (PERSERO) TBK
STATEMENT OF CHANGES IN EQUITY (continued)
For the Year Ended December 31, 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	Modal Ditempatkan dan Disetor Penuh/ *Issued and Fully Paid Capital Stock*	Tambahan Modal disetor/ *Additional Paid-in Capital*	Dana Setoran Modal/ *Deposit capital fund*	Keuntungan (Kerugian) yang Belum Direalisasi dan Cadangan kerugian penurunan nilai atas Efek efek dan Obligasi Pemerintah yang Diukur pada nilai wajar melalui penghasilan komprehensif lain-Neto/ *Unrealized Gain (Loss) and allowance for impairment losses on FVTOCI Securities and Government Bonds - Net*	Pengukuran Kembali Program Imbalan Pasti - Neto/ *Remeasurement of Defined Benefit Plan - Net*	Surplus Revaluasi Aset Tetap/ *Revaluation Surplus of Premises and Equipment*	Bagian Efektif Lindung Nilai Arus Kas/ *Effective Portion of Cash Flow Hedges*	Saldo Laba/ *Retained Earnings**)		Ekuitas/ *Equity*	
									Telah Ditentukan Penggunaannya/ *Appropriated*	Belum Ditentukan Penggunaannya/ *Unappropriated*		
Saldo per 31 Desember 2023		**7.017.222**	**4.418.900**	**-**	**(769.001)**	**(560.339)**	**3.565.773**	**(32.346)**	**13.181.214**	**3.657.729**	**30.479.152**	***Balance as of December 31, 2023***
Total Laba (Rugi) komprehensif tahun berjalan	2h,8 9,12,41	-	-	-	(338.981)	136.324	-	(11.736)	-	3.007.328	2.792.935	*Total comprehensive income (loss) for the year*
Penerbitan saham		-	-	-	-	-	-	-	-	-	-	*Shares issuance*
Dana setoran modal	30d	-	-	-	-	-	-	-	-	-	-	*Capital deposit fund*
Dividen	30c	-	-	-	-	-	-	-	-	(700.198)	(700.198)	*Dividend*
Pembentukan cadangan umum dan cadangan tujuan	30c	-	-		-	-	-	-	2.800.790	(2.800.790)	-	*Appropriation for general and special reserves*
Saldo per 31 Desember 2024		**7.017.222**	**4.418.900**	**-**	**(1.107.982)**	**(424.015)**	**3.565.773**	**(44.082)**	**15.982.004**	**3.164.069**	**32.571.889**	***Balance as of December 31, 2024***

*) Saldo defisit sebesar Rp14.226.290 telah dieliminasi akibat kuasi-reorganisasi pada tanggal 31 Mei 2007.

*) *Accumulated losses amounted to Rp14,226,290 had been eliminated as a result of quasi-reorganization as of May 31, 2007.*

Catatan atas laporan keuangan terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan secara keseluruhan.

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PT BANK TABUNGAN NEGARA (PERSERO) TBK
LAPORAN ARUS KAS
Untuk Tahun yang Berakhir Pada Tanggal 31 Desember 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

PT BANK TABUNGAN NEGARA (PERSERO) TBK
STATEMENT OF CASH FLOWS
For the Year Ended December 31, 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	Tahun yang Berakhir pada Tanggal 31 Desember/ *Year Ended December 31,* 2024	2023	2022	
ARUS KAS DARI AKTIVITAS OPERASI					***CASH FLOWS FROM OPERATING ACTIVITIES***
Penerimaan bunga, bagi hasil, dan marjin		29.689.639	27.618.186	24.331.326	*Interest, profit sharing, and margin*
Pembayaran bunga dan bonus, provisi dan komisi		(17.973.763)	(14.892.249)	(10.775.222)	*Interest and bonus, fees and commissions paid*
Penerimaan kredit yang telah dihapusbukukan		1.421.221	1.011.258	503.307	*Recoveries from loan debts written-off*
Pembayaran pajak penghasilan badan		(912.208)	(1.020.952)	(1.001.324)	*Corporate income tax paid*
Penerimaan dari surat ketetapan pajak	39	-	-	402.428	*Recoveries from tax assessment letter*
Pendapatan operasional lainnya		3.213.023	2.938.412	1.737.599	*Other operating income*
Beban operasional lainnya		(9.585.564)	(8.729.240)	(8.633.782)	*Other operating expense*
(Beban) pendapatan bukan operasional lainnya - neto		(63.538)	(54.382)	13.828	*Other non-operating (expenses) income - net*
Penerimaan kas sebelum perubahan aset dan liabilitas operasi		5.788.810	6.871.033	6.578.160	*Cash receipts before changes in operating assets and liabilities*
Perubahan dalam aset dan liabilitas operasi:					***Changes in operating assets and liabilities:***
Penurunan (kenaikan) dalam aset operasi:					*Decrease (increase) in operating assets:*
Efek-efek yang diukur pada nilai wajar Melalui laba rugi		(18.286.677)	(246.380)	(104.885)	*Fair value through profit or loss securities*
Obligasi pemerintah yang diukur pada nilai wajar melalui laba rugi		490.445	15.788.979	(4.955.939)	*Fair value through profit or loss government bonds*
Tagihan akseptasi		(397.331)	(124.005)	33.578	*Acceptance receivable*
Tagihan derivatif		(70.666)	-	-	*Derivative receivable*
Kredit yang diberikan dan pembiayaan/ piutang syariah		(27.739.554)	(38.484.306)	(26.318.471)	*Loans and sharia financing/ receivables*
Aset lain-lain		(136.021)	(785.307)	(196.503)	*Other assets*
Kenaikan (penurunan) dalam Liabilitas operasi:					*Increase (decrease) in operating liabilities:*
Liabilitas segera		(441.930)	74.415	(466.852)	*Liabilites due immediately*
Simpanan dari nasabah					*Deposits from customer*
Giro		11.653.971	24.468.372	31.538.044	*Demand deposits*
Giro *Wadiah*		5.443.299	4.814.656	3.268.857	*Wadiah demand deposits*
Tabungan		(22.012)	1.539.832	(10.617.072)	*Savings deposits*
Tabungan *Wadiah*		245.340	82.875	43.479	*Savings deposits Wadiah*
Deposito berjangka		12.615.733	(5.504.388)	(322.562)	*Time deposits*
Simpanan dari bank lain		(21.277)	(45.095)	70.400	*Deposits from other banks*
Liabilitas akseptasi		397.331	124.005	(33.578)	*Acceptance payables*
Liabilitas lain-lain		(416.997)	(4.184.154)	654.214	*Other liabilities*
Dana *syirkah* temporer		2.141.920	2.243.821	2.094.203	*Temporary syirkah funds*
Kas Neto (Digunakan Untuk)/Diperoleh dari Aktivitas Operasi		**(8.755.616)**	**6.634.353**	**1.265.073**	***Net Cash (Used in)/Provided by Operating Activities***

Catatan atas laporan keuangan terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan secara keseluruhan.

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PT BANK TABUNGAN NEGARA (PERSERO) TBK
LAPORAN ARUS KAS (lanjutan)
Untuk Tahun yang Berakhir Pada Tanggal 31 Desember 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

PT BANK TABUNGAN NEGARA (PERSERO) TBK
STATEMENT OF CASH FLOWS (continued)
For the Year Ended December 31, 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	Tahun yang Berakhir pada Tanggal 31 Desember/ *Year Ended December 31,* 2024	2023	2022	
ARUS KAS DARI AKTIVITAS INVESTASI					***CASH FLOWS FROM INVESTING ACTIVITIES***
(Pembelian) penerimaan saat jatuh tempo dari efek-efek biaya perolehan diamortisasi		(2.878.561)	(2.868.515)	199.964	*(Purchase) receipt from matured amortized cost securities*
Perolehan aset tetap	14	(1.634.521)	(2.313.490)	(1.042.464)	*Acquisitions of premises and equipment*
(Pembelian) penerimaan efek-efek diukur pada nilai wajar melalui penghasilan komprehensif lain		(31.199)	(1.247.159)	381.580	*(Purchase) receipt in fair value through other comprehensive income securities*
(Pembelian) Penerimaan obligasi pemerintah diukur pada nilai wajar melalui penghasilan komprehensif lain		(1.163.910)	2.211.325	5.714.402	*(Purchase)Receipt in fair value through other comprehensive income government bonds*
Penerimaan (pembelian) obligasi pemerintah pada biaya perolehan diamortisasi		562.232	(1.655.566)	(7.816.426)	*Receipt (purchase) of amortized cost government bonds*
Penempatan efek-efek yang dibeli dengan janji dijual kembali		(20.867.689)	(43.597.267)	(165.520.488)	*Placement of securities purchased under agreement to resell*
Penerimaan efek-efek yang dibeli dengan janji dijual kembali		20.704.263	45.031.457	165.683.898	*Receipt of securities purchased under agreement to resell*
Penjualan aset tetap		3.045	-	-	*Sales of premises and equipment*
Kas Neto digunakan untuk Aktivitas Investasi		**(5.306.340)**	**(4.439.215)**	**(2.399.534)**	***Net Cash used in Investing Activities***
ARUS KAS DARI AKTIVITAS PENDANAAN					***CASH FLOWS FROM FINANCING ACTIVITIES***
Penerimaan atas surat berharga yang diterbitkan		680.913	2.449.019	1.541.330	*Proceeds of securities issued*
Pembayaran atas surat-surat berharga yang diterbitkan jatuh tempo		(3.572.500)	(2.769.764)	(5.263.000)	*Payment of matured securities issued*
Pembayaran atas Pinjaman subordinasi yang jatuh tempo		(3.000.000)	-	-	*Payment of matured subordinated borrowing*
Penerimaan atas efek-efek yang dijual dengan janji dibeli kembali		143.153.604	67.691.353	592.326	*Proceeds from securities sold under repurchase agreements*
Pembayaran atas jatuh tempo efek-efek yang dijual dengan janji dibeli kembali		(139.744.766)	(67.691.353)	(592.326)	*Payments of matured securities sold under repurchase agreements*
Pembayaran dividen	30c	(700.198)	(609.015)	(237.624)	*Payments of dividends*
Penerimaan dari pinjaman yang diterima		11.144.193	11.185.162	11.814.826	*Proceeds from fund borrowings*
Pembayaran dari pinjaman yang diterima		(11.385.262)	(2.187.576)	(9.095.884)	*Payment of fund borrowings*
Pembayaran liabilitas sewa	29	(93.408)	(81.973)	(84.983)	*Payment of lease liabilities*
Dana setoran modal		-	1.330.093	2.756.575	*Shares issuance*
Kas Neto (Digunakan untuk)/Diperoleh dari Aktivitas Pendanaan		**(3.517.424)**	**9.315.946**	**1.431.240**	***Net Cash (Used in)/Provided by Financing Activities***
(PENURUNAN)/KENAIKAN NETO KAS DAN SETARA KAS		**(17.579.380)**	**11.511.084**	**296.779**	***NET (DECREASE)/INCREASE CASH AND CASH EQUIVALENTS***
KAS DAN SETARA KAS AWAL TAHUN		**53.037.770**	**41.526.686**	**41.229.907**	***CASH AND CASH EQUIVALENTS AT BEGINNING OF YEAR***
KAS DAN SETARA KAS AKHIR TAHUN		**35.458.390**	**53.037.770**	**41.526.686**	***CASH AND CASH EQUIVALENTS AT END OF YEAR***

Catatan atas laporan keuangan terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan secara keseluruhan.

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PT BANK TABUNGAN NEGARA (PERSERO) TBK
LAPORAN ARUS KAS (lanjutan)
Untuk Tahun yang Berakhir Pada Tanggal
31 Desember 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

PT BANK TABUNGAN NEGARA (PERSERO) TBK
STATEMENT OF CASH FLOWS (continued)
For the Year Ended
December 31, 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	Tahun yang Berakhir pada Tanggal 31 Desember/ *Year Ended December 31,* 2024	2023	2022	
Rincian kas dan setara kas akhir tahun adalah sebagai berikut:					*The details of cash and cash equivalents at end of year are as follows:*
Kas	2a,4	2.105.620	2.127.489	1.661.533	*Cash*
Giro pada Bank Indonesia	2f,5	22.739.920	18.145.761	25.416.941	*Current accounts with Bank Indonesia*
Giro pada bank lain	2f,6	5.951.746	2.203.398	1.472.257	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain - jangka waktu jatuh tempo tiga bulan atau kurang sejak tanggal perolehan	2g,7	4.661.104	30.561.122	12.975.955	*Placements with Bank Indonesia and other banks - maturing within three months or less since the acquisition date*
Total		**35.458.390**	**53.037.770**	**41.526.686**	***Total***

Catatan atas laporan keuangan terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan secara keseluruhan.

The accompanying notes to the financial statements form an integral part of these financial statements taken as a whole.

1. UMUM

a. Pendirian Bank

PT Bank Tabungan Negara (Persero) Tbk ("Bank") didirikan sebagai bank milik negara, semula dengan nama "Bank Tabungan Pos" berdasarkan Undang-undang Darurat No. 9 Tahun 1950 tanggal 9 Februari 1950. Selanjutnya, berdasarkan Peraturan Pemerintah Pengganti Undang-undang No. 4 tahun 1963, nama Bank Tabungan Pos diubah menjadi "Bank Tabungan Negara". Pada tanggal 29 April 1989, Bank mulai beroperasi sebagai bank umum milik negara.

Berdasarkan Peraturan Pemerintah No. 24 Tahun 1992, status Bank diubah menjadi perseroan terbatas milik negara (Persero). Akta pendirian Bank sebagai Persero dibuat dihadapan Notaris Muhani Salim, S.H., No. 136 tanggal 31 Juli 1992 dan telah disahkan oleh Menteri Kehakiman dengan Surat Keputusan No. C2-6587.HT.01.01. TH.92 tanggal 12 Agustus 1992, serta diumumkan dalam Berita Negara No. 73 tanggal 11 September 1992 Tambahan No. 6A.

Berdasarkan surat keputusan Direksi Bank Indonesia No. 27/55/KEP/DIR tanggal 23 September 1994, Bank memperoleh status sebagai bank devisa.

Bank telah mendapatkan persetujuan dari Bank Indonesia untuk melakukan kegiatan umum perbankan berdasarkan prinsip syariah melalui surat No. 6/1350/DPbS tanggal 15 Desember 2004.

Bank mulai melakukan kegiatannya berdasarkan prinsip syariah pada tanggal 14 Februari 2005 dengan mulai beroperasinya cabang syariah pertama di Jakarta - Harmoni.

Pernyataan keputusan Rapat Umum Pemegang Saham Luar Biasa yang menyetujui perubahan seluruh Anggaran Dasar PT Bank Tabungan Negara (Persero) menjadi Perseroan Terbuka telah diaktakan dengan akta notaris No. 7 tanggal 12 Oktober 2009 dari notaris Fathiah Helmi, S.H., Perubahan anggaran dasar tersebut mendapat persetujuan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia melalui surat No. AHU-49309.AH.01.02. Tahun 2009.

1. GENERAL

a. Bank's establishment

PT Bank Tabungan Negara (Persero) Tbk ("the Bank") was originally established as a state-owned bank under the name "Bank Tabungan Pos" based on Martial Law No. 9 of 1950 dated February 9, 1950. Subsequently, the name of the Bank was changed to "Bank Tabungan Negara" based on Government Regulation Amendment of Law No. 4 of 1963. The Bank started operating as a state-owned commercial bank on April 29, 1989.

Based on Government Regulation No. 24 of 1992, the status of the Bank was changed to a state-owned limited liability corporation (Persero). The Bank's deed of establishment as a limited liability corporation was documented under deed No. 136 dated July 31, 1992 of Notary Muhani Salim, S.H., and was approved by the Ministry of Justice in its Decision Letter No. C2-6587.HT.01.01. TH.92 dated August 12, 1992 and was published in Supplement No. 6A of State Gazette No. 73 dated September 11, 1992.

Based on the Decision Letter No. 27/55/KEP/DIR dated September 23, 1994 of the Directors of Bank Indonesia, the Bank obtained the status of a foreign exchange bank.

The Bank has obtained approval from Bank Indonesia to conduct commercial banking activities based on sharia principles through letter No. 6/1350/DPbS dated December 15, 2004.

The Bank started its activities based on sharia principles on February 14, 2005 with the operation of its first sharia branch in Jakarta - Harmoni.

The decision of the Extraordinary General Stockholders' Meeting to amend all of the Bank's Articles of Association to become a public company was notarized under notarial deed No. 7 dated October 12, 2009 of Fathiah Helmi, S.H., The amendment was approved by the Ministry of Laws and Human Rights in its letter No. AHU-49309.AH-01.02. of 2009.

1. UMUM (lanjutan)

a. Pendirian Bank (lanjutan)

Anggaran Dasar Bank telah mengalami beberapa kali perubahan. Penyesuaian terakhir dinyatakan dalam Akta No. 8 tanggal 6 Maret 2024 yang dibuat dihadapan Ashoya Ratam, S.H., MKn., notaris di Jakarta, berdasarkan keputusan Rapat Umum Pemegang Saham Tahunan tanggal 6 Maret 2024 dan telah mendapat persetujuan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia, dengan Surat Keputusan No.AHU-0022194.AH.01.02 tanggal 5 April 2024.

Berdasarkan pasal 3 Anggaran Dasar Bank, ruang lingkup kegiatan Bank adalah menjalankan kegiatan umum perbankan sesuai dengan undang-undang dan peraturan yang berlaku, termasuk melakukan kegiatan Bank berdasarkan prinsip syariah.

Bank berdomisili di Jakarta dan kantor pusat Bank berlokasi di Jalan Gajah Mada No. 1, Jakarta Pusat.

Pada tanggal 31 Desember 2024, Bank memiliki 117 kantor cabang (termasuk 35 kantor cabang syariah), 611 kantor cabang pembantu (termasuk 75 kantor cabang pembantu syariah) (tidak diaudit).

Pada tanggal 31 Desember 2023, Bank memiliki 115 kantor cabang (termasuk 34 kantor cabang syariah), 616 kantor cabang pembantu (termasuk 75 kantor cabang pembantu syariah) (tidak diaudit).

Pada tanggal 31 Desember 2022, Bank memiliki 110 kantor cabang (termasuk 30 kantor cabang syariah), 606 kantor cabang pembantu (termasuk 69 kantor cabang pembantu syariah), dan 5 kantor kas syariah (tidak diaudit).

1. GENERAL (continued)

a. Bank's establishment (continued)

The Articles of Association of the Bank has been amended several times. The amendment was covered by Notarial Deed No. 8 dated March 6, 2024 of Ashoya Ratam, S.H., MKn., a notary in Jakarta, as approved in the Annual General Shareholders' Meeting on March 6, 2024 and approved by the Ministry of Laws and Human Rights of the Republic of Indonesia, in its Decision Letter No. AHU-0022194.AH.01.02 dated April 5, 2024.

According to Article 3 of the Bank's Articles of Association, the scope of the Bank's activities is to conduct commercial banking activities in accordance with the prevailing laws and regulations, including the Bank's activities based on sharia principles.

The Bank is domiciled in Jakarta and its head office is located at Jalan Gajah Mada No. 1, Central Jakarta.

As of December 31, 2024, the Bank has 117 branch offices (including 35 sharia branch offices), 611 sub-branch offices (including 75 sharia sub-branch offices) (unaudited).

As of December 31, 2023, the Bank has 115 branch offices (including 34 sharia branch offices), 616 sub-branch offices (including 75 sharia sub-branch offices)(unaudited).

As of December 31, 2022, the Bank has 110 branch offices (including 30 sharia branch offices), 606 sub-branch offices (including 69 sharia sub-branch offices), and 5 sharia cash offices (unaudited).

1. UMUM (lanjutan)

b. Rekapitalisasi

Pada tanggal 28 Mei 1999, Pemerintah mengeluarkan Peraturan Pemerintah No. 52 Tahun 1999 tentang penambahan penyertaan Pemerintah pada Bank dalam rangka Program Rekapitalikassasi yang dijalankan oleh Pemerintah dengan nilai setinggi-tingginya sebesar Rp11.200.000. Pada tanggal 21 Agustus 2000, Pemerintah mengeluarkan Peraturan Pemerintah No. 68 Tahun 2000 tentang penambahan modal Pemerintah pada Bank dalam rangka Program Rekapitalisasi yang dijalankan oleh Pemerintah dengan nilai setinggi-tingginya sebesar Rp2.805.000, sehingga tambahan penyertaan Pemerintah keseluruhan menjadi sebesar Rp14.005.000. Penambahan modal tersebut dilakukan melalui penerbitan obligasi rekapitalisasi Pemerintah untuk Bank sebesar Rp9.803.500 dan Rp4.201.500 masing-masing pada tanggal 25 Juli 2000 dan 31 Oktober 2000.

Pada tanggal 28 Februari 2001, Direksi Bank dan Menteri Keuangan menandatangani Kontrak Manajemen yang berisikan antara lain bahwa jumlah kebutuhan rekapitalisasi akhir Bank adalah sebesar Rp13.843.540 dan kelebihan obligasi rekapitalisasi sebesar Rp161.460 harus dikembalikan kepada Pemerintah. Pada tanggal 5 November 2001, kelebihan obligasi rekapitalisasi tersebut dikembalikan kepada Pemerintah.

Sebagai tindak lanjut dari Kontrak Manajemen tersebut, Menteri Keuangan Republik Indonesia mengeluarkan Peraturan Menteri Keuangan No. 40/PMK.06/2008 tanggal 29 Februari 2008 tentang penetapan nilai akhir kebutuhan rekapitalisasi Bank sebesar Rp13.843.540 dan pelaksanaan hak-hak pemerintah yang timbul sebagai akibat penambahan penyertaan modal negara Republik Indonesia ke dalam modal PT Bank Tabungan Negara (Persero) dalam rangka program rekapitalisasi bank umum dengan mengkonversi menjadi 13.843.540 lembar saham yang diterbitkan oleh Bank dengan nominal Rp1.000.000 (Rupiah penuh) per lembar. Peraturan ini berdaya laku surut sejak tanggal 31 Mei 2007.

1. GENERAL (continued)

b. Recapitalization

On May 28, 1999, the Government issued Government Regulation No. 52 of 1999 regarding the increase in the Government's capital participation in the Bank within the framework of the Government's Recapitalization Program for a maximum amount of Rp11,200,000. On August 21, 2000, the Government issued Government Regulation No. 68 of 2000 regarding the increase in the Government's capital participation in the Bank within the framework of the Government's Recapitalization Program for a maximum amount of Rp2,805,000 so that the additional Government capital participation would become Rp14,005,000. The increase in the Government participation was settled through the issuance to the Bank of the government's recapitalization bonds amounting to Rp9,803,500 and Rp4,201,500 on July 25, 2000 and October 31, 2000, respectively.

On February 28, 2001, the Bank's Directors and the Ministry of Finance entered into a Management Contract which includes, among others, the total final recapitalization requirement of the Bank of Rp13,843,540 and the excess recapitalization bonds of Rp161,460 which should be returned to the Government. On November 5, 2001, the Bank returned such excess recapitalization bonds to the government.

As a result of the Management Contract, the Ministry of Finance issued Regulation No. 40/PMK.06/2008 dated February 29, 2008 regarding the determination of the final amount of the Government's required capital contribution to the Bank amounting to Rp13,843,540 and implementation of the Government's rights as a result of the additional contributed capital by the Republic of Indonesia to the capital of PT Bank Tabungan Negara (Persero), as a limited liability company, in relation to the commercial banks' recapitalization program through conversion of additional capital to 13,843,540 shares of stock, which were issued by the Bank with a par value of Rp1,000,000 (full Rupiah) per share. This regulation was applied retroactively since May 31, 2007.

1. UMUM (lanjutan)

c. Penerbitan Surat Berharga Bank

Bank telah menerbitkan obligasi sebanyak 25 (dua puluh lima) kali penerbitan, 1 (satu) kali penerbitan instrumen obligasi subordinasi, 1 (satu) kali penerbitan *global bond, 7* (tujuh) kali penerbitan surat hutang jangka panjang, 2 (dua) kali penerbitan sukuk mudharabah sejak tanggal 25 Juli 1989 sampai dengan tanggal 31 Desember 2024 dengan rincian sebagai berikut:

1. GENERAL (continued)

c. Issuance of Bank Securities

The Bank issued 25 (twenty-five) series of bonds, 1 (one) series of subordinated bond, 1 (one) series of global, 7 (seven) series of long term notes, 2 (two) sukuk mudharabah from July 25, 1989 to December 31, 2024, with the details as follows:

Nama Obligasi/ *Name of Bonds*	Jumlah Nominal/ *Nominal Amount*	Jangka Waktu/ *Term*	Jatuh Tempo/ *Maturity Date*	Tingkat Bunga/ *Interest*
Rupiah				
Obligasi BTN I/ *BTN Bonds I*	50.000	5 tahun/*years*	25 Juli/ *July 25, 1994*)*	18,75% tetap/ *fixed*
Obligasi BTN II/ *BTN Bonds II*	50.000	5 tahun/*years*	1 Juni/ *June 1,1995*)*	16,25% tetap/ *fixed*
Obligasi BTN III/ *BTN Bonds III*	50.000	5 tahun/*years*	11 November/ *November 11, 1996*)*	20,00% tetap/ *fixed*
Obligasi BTN IV/ *BTN Bonds IV*	100.000	5 tahun/*years*	23 Januari/ *January 23, 1996*)*	17,00% tetap/ *fixed*
Obligasi BTN V/ *BTN Bonds V*	150.000	5 tahun/*years*	31 Juli/ *July 31,1998*)*	15,25% tetap untuk tahun pertama dan kedua, mengambang untuk tahun berikutnya hingga jatuh tempo/ *15.25% fixed for first and second years, in for remaining years until maturity*
Obligasi BTN VI/ *BTN Bonds VI*	350.000	5 tahun/*years*	21 Desember/ *December 21, 2000*)*	17,25% tetap untuk tahun pertama, mengambang untuk tahun berikutnya hingga jatuh tempo/ *17.25% fixed for first year, floating for remaining years until maturity*
Obligasi BTN VII/ *BTN Bonds VII*	200.000	5 tahun/*years*	22 Juli/ *July 22, 2001*)*	17,125% tetap untuk tahun pertama, mengambang untuk tahun berikutnya hingga jatuh tempo/ *17.125% fixed for first year, floating for remaining years until maturity*
Obligasi BTN VIII/ *BTN Bonds VIII*	400.000	5 tahun/*years*	18 Juli/ *July 18, 2002*)*	14,15% tetap/ *fixed*
Obligasi BTN IX/ *BTN Bonds IX*	750.000	5 tahun/*years*	2 Oktober/ *October 2, 2008*)*	12,50% tetap/ *fixed*
Obligasi BTN X/ *BTN Bonds X*	750.000	5 tahun/*years*	25 Mei/ *May 25, 2009*)*	12,20% tetap/ *fixed*
Obligasi BTN XI/ *BTN Bonds XI*	750.000	5 tahun/*years*	6 Juli/ *July 6, 2010*)*	12,00% tetap/ *fixed*
Obligasi BTN XII/ *BTN Bonds XII*	1.000.000	10 tahun/*years*	19 September/ *September 19, 2016*)*	12,75% tetap/ *fixed*
Obligasi BTN XIII A/ *BTN Bonds XIII A*	300.000	3 tahun/*years*	29 Mei/ *May 29, 2012*)*	11,75% tetap/ *fixed*
Obligasi BTN XIII B/ *BTN Bonds XIII B*	300.000	4 tahun/*years*	29 Mei/ *May 29, 2013*)*	12,00% tetap/ *fixed*
Obligasi BTN XIII C/ *BTN Bonds XIII C*	900.000	5 tahun/*years*	29 Mei/ *May 29, 2014*)*	12,25% tetap/ *fixed*
Obligasi BTN XIV/ *BTN Bonds XIV*	1.650.000	10 tahun/*years*	11 Juni/ *June 11, 2020*)*	10,25% tetap/ *fixed*
Obligasi BTN XV/ *BTN Bonds XV*	1.300.000	10 tahun/*years*	28 Juni/ *June 28, 2021*)*	9,50% tetap/ *fixed*

*) Bank telah melakukan pelunasan obligasi yang diterbitkan pada tanggal jatuh temponya.

*) *The Bank has made the repayment of bonds issued on maturity date.*

1. UMUM (lanjutan)

c. Penerbitan Surat Berharga Bank (lanjutan)

Bank telah menerbitkan obligasi sebanyak 25 (dua puluh lima) kali penerbitan, 1 (satu) kali penerbitan instrumen obligasi subordinasi, 1 (satu) kali penerbitan *global bond, 7* (tujuh) kali penerbitan surat hutang jangka panjang, 2 (dua) kali penerbitan sukuk mudharabah sejak tanggal 25 Juli 1989 sampai dengan tanggal 31 Desember 2024 dengan rincian sebagai berikut: (lanjutan)

1. GENERAL (continued)

c. Issuance of Bank Securities (continued)

The Bank issued 25 (twenty-five) series of bonds, 1 (one) series of subordinated bond, 1 (one) series of global, 7 (seven) series of long term notes, 2 (two) sukuk mudharabah from July 25, 1989 to December 31, 2024, with the details as follows: (continued)

Nama Obligasi/ ***Name of Bonds***	**Jumlah Nominal/** ***Nominal Amount***	**Jangka Waktu/** ***Term***	**Jatuh Tempo/** ***Maturity Date***	**Tingkat Bunga/** ***Interest***
Rupiah				
Obligasi Berkelanjutan I Tahap I BTN/ *Continuing Bonds I Phase I BTN*	2.000.000	10 tahun/*years*	5 Juni/ *June 5, 2022*)*	7,90% tetap/ *fixed*
Obligasi Berkelanjutan I Tahap II BTN/ *Continuing Bonds I Phase II BTN*	2.000.000	10 tahun/*years*	27 Maret/ *March 27, 2023*)*	7,90% tetap/ *fixed*
Obligasi Berkelanjutan II Tahap I BTN/ *Continuing Bonds II Phase I BTN*				
Seri A/*A Series*	900.000	3 tahun/*years*	8 Juli/ *July 8, 2018*)*	9,63% tetap/ *fixed*
Seri B/*B Series*	500.000	5 tahun/*years*	8 Juli/ *July 8, 2020*)*	9,88% tetap/ *fixed*
Seri C/*C Series*	800.000	7 tahun/*years*	8 Juli/ *July 8, 2022*)*	10,00% tetap/ *fixed*
Seri D/*D Series*	800.000	10 tahun/*years*	8 Juli/ *July 8, 2025*	10,50% tetap/ *fixed*
Obligasi Berkelanjutan II Tahap II BTN/ *Continuing Bonds II Phase II BTN*				
Seri A/*A Series*	1.347.000	3 tahun/*years*	30 Agustus/ *August 30, 2019*)*	8,20% tetap/ *fixed*
Seri B/*B Series*	1.653.000	5 tahun/*years*	30 Agustus/ *August 30, 2021*)*	8,75% tetap/ *fixed*
Obligasi Berkelanjutan III Tahap I BTN/ *Continuing Bonds III Phase I BTN*				
Seri A/*A Series*	1.466.000	3 tahun/*years*	13 Juli/ *July 13, 2020*)*	8,30% tetap/ *fixed*
Seri B/*B Series*	1.295.000	5 tahun/*years*	13 Juli/ *July 13, 2022*)*	8,50% tetap *fixed*
Seri C/*C Series*	853.000	7 tahun/*years*	13 Juli/ *July 13, 2024*)*	8,70% tetap/ *fixed*
Seri D/*D Series*	1.386.000	10 tahun/*years*	13 Juli/ *July 13, 2027*	8,90% tetap/ *fixed*
Obligasi Berkelanjutan III Tahap II BTN/ *Continuing Bonds III Phase II BTN*				
Seri A/*A Series*	1.756.500	1 tahun/*year*	8 Juli/ *July 8, 2020*)*	7,75% tetap/ *fixed*
Seri B/*B Series*	1.168.000	3 tahun/*years*	28 Juni/ *June 28, 2022*)*	8,75% tetap *fixed*
Seri C/*C Series*	1.219.500	5 tahun/*years*	28 Juni/ *June 28, 2024*)*	9,00% tetap/ *fixed*

*) Bank telah melakukan pelunasan obligasi yang diterbitkan pada tanggal jatuh temponya.
**) Bank telah melakukan opsi beli kembali pada 25 Mei 2009

*) *The Bank has made the repayment of bonds issued on maturity date.*
***) The Bank has exercised the call options on May 25, 2009*

1. UMUM (lanjutan)

c. Penerbitan Surat Berharga Bank (lanjutan)

Bank telah menerbitkan obligasi sebanyak 25 (dua puluh lima) kali penerbitan, 1 (satu) kali penerbitan instrumen obligasi subordinasi, 1 (satu) kali penerbitan *global bond, 7* (tujuh) kali penerbitan surat hutang jangka panjang, 2 (dua) kali penerbitan sukuk mudharabah sejak tanggal 25 Juli 1989 sampai dengan tanggal 31 Desember 2024 dengan rincian sebagai berikut: (lanjutan)

1. GENERAL (continued)

c. Issuance of Bank Securities (continued)

The Bank issued 25 (twenty-five) series of bonds, 1 (one) series of subordinated bond, 1 (one) series of global, 7 (seven) series of long term notes, 2 (two) sukuk mudharabah from July 25, 1989 to December 31, 2024, with the details as follows: (continued)

Nama Obligasi/ ***Name of Bonds***	**Jumlah Nominal/** ***Nominal Amount***	**Jangka Waktu/** ***Term***	**Jatuh Tempo/** ***Maturity Date***	**Tingkat Bunga/** ***Interest***
Rupiah				
Obligasi Berkelanjutan IV Tahap I BTN/ *Continuing Bonds IV Phase I BTN*				
Seri A/*A Series*	577.000	1 tahun/*year*	29 Agustus/ *August 29, 2021*)*	6,75% tetap/ *fixed*
Seri B/*B Series*	727.000	3 tahun/*years*	19 Agustus/ *August 19, 2023*)*	7,80% tetap *fixed*
Seri C/*C Series*	196.000	5 tahun/*years*	19 Agustus/ *August 19, 2025*	8,40% tetap/ *fixed*
Obligasi Berkelanjutan IV Tahap II BTN/ *Continuing Bonds IV Phase II BTN*				
Seri A/*A Series*	600.000	3 tahun/*year*	24 Mei/ *May 24, 2025*	5,50% tetap/ *fixed*
Seri B/*B Series*	400.000	5 tahun/*years*	24 Mei/ *May 24, 2027*	6,00% tetap/ *fixed*
Obligasi Subordinasi BTN I/ *Subordinated Bonds BTN I*	250.000	10 tahun/*years*	25 Mei/ *May 25, 2014**)*	12,60% tetap untuk tahun pertama sampai tahun kelima, 22,60% tetap untuk tahun keenam sampai tahun kesepuluh jika Bank tidak melakukan opsi beli pada tahun kelima sejak tanggal penerbitan/ *12.60% fixed for first year until fifth year, 22.60% fixed for sixth year until tenth year if the Bank does not exercise its option to buyback on the fifth year since the issuance date*
Surat Hutang Jangka Panjang BTN Tahap I 2021/ *Long Term Notes BTN Phase 1 2021*	10.186	16 tahun/*years*	17 Juni/ *June 17, 2037*	*1,37% tetap/ fixed*
Surat Hutang Jangka Panjang BTN Seri A 2022/ *Long Term Notes BTN Series A 2022*	47.740	14 tahun/*years*	12 Oktober/ *October 12, 2036*	*1,37% tetap/ fixed*
Surat Hutang Jangka Panjang BTN Seri B 2022/ *Long Term Notes BTN Series B 2022*	79.379	15 tahun/*years*	12 April/ *April 12, 2037*	*0,55% tetap/ fixed*
Surat Hutang Jangka Panjang BTN Tahap I 2022. *Long Term Notes BTN Phase I 2022*	210.866	15 tahun/*years*	14 Juni/ *June 14, 2037*	*0,55% tetap/ fixed*
Surat Hutang Jangka Panjang BTN Tahap II 2022/ *Long Term Notes BTN Phase II 2022*	131.185	14 tahun/*years*	*28* Maret/ *March 28, 2037*	*0,55% tetap/ fixed*
Surat Hutang Jangka Panjang BTN Tahap I 2023/ *Long Term Notes BTN Phase I 2023*	35.898	14 tahun/*years*	*28* April/ *April 28, 2037*	*0,55% tetap/ fixed*
Surat Hutang Jangka Panjang BTN Tahap II 2023/ *Long Term Notes BTN Phase II 2023*	404.745	14 tahun/*years*	*15 September/ September 15, 2037*	*1,37% tetap/ fixed*
Surat Hutang Jangka Panjang BTN Seri A 2023/ *Long Term Notes BTN Series A 2023*	6.242	15 tahun/*years*	*27* December/ *December 27, 2038*	*0,55% tetap/ fixed*

*) Bank telah melakukan pelunasan obligasi yang diterbitkan pada tanggal jatuh temponya.
**) Bank telah melakukan opsi beli kembali pada 25 Mei 2009

**) The Bank has made the repayment of bonds issued on maturity date.*
***) The Bank has exercised the call options on May 25, 2009*

1. UMUM (lanjutan)

c. Penerbitan Surat Berharga Bank (lanjutan)

Bank telah menerbitkan obligasi sebanyak 25 (dua puluh lima) kali penerbitan, 1 (satu) kali penerbitan instrumen obligasi subordinasi, 1 (satu) kali penerbitan *global bond, 7* (tujuh) kali penerbitan surat hutang jangka panjang, 2 (dua) kali penerbitan sukuk mudharabah sejak tanggal 25 Juli 1989 sampai dengan tanggal 31 Desember 2024 dengan rincian sebagai berikut: (lanjutan)

1. GENERAL (continued)

c. Issuance of Bank Securities (continued)

The Bank issued 25 (twenty-five) series of bonds, 1 (one) series of subordinated bond, 1 (one) series of global, 7 (seven) series of long term notes, 2 (two) sukuk mudharabah from July 25, 1989 to December 31, 2024, with the details as follows: (continued)

Nama Obligasi/ *Name of Bonds*	Jumlah Nominal/ *Nominal Amount*	Jangka Waktu/ *Term*	Jatuh Tempo/ *Maturity Date*	Tingkat Bunga/ *Interest*
Rupiah				
Surat Hutang Jangka Panjang BTN Seri B 2023/ *Long Term Notes BTN Series B 2023*	234.542	14 tahun/*years*	*27 December/ December 27, 2037*	*1,37% tetap/ fixed*
Surat Hutang Jangka Panjang BTN Tahun 2024/ *Long Term Notes BTN 2024*	203.351	14 tahun/*years*	*7 Agustus/ August 7, 2038*	*1,37% tetap/ fixed*
Surat Hutang Jangka Panjang BTN Tahap V 2024/ *Long Term Notes BTN Phase V 2024*	312.678	14 tahun/*years*	*27 Desember/ December 27, 2038*	*1,37% tetap/ fixed*
Surat Hutang Jangka Panjang BTN Tahap VI 2024/ *Long Term Notes BTN Phase VI 2024*	147.909	14 tahun/*years*	*23 Desember/ December 23, 2038*	*1,37% tetap/ fixed*
Sukuk BTN I Tahun 2023 Tahap I/ *Sukuk BTN Phase I 2023*	92.553	15,5 tahun/*years*	28 Oktober/ *October 28, 2036*	*11,00%***
Sukuk BTN I Tahun 2023 Tahap II/ *Sukuk BTN Phase II 2023*	175.039	13 tahun/*years*	*27* Desember/ *December 27, 2036*	*27,40%****
Sukuk BTN I Tahun 2024 Tahap III/ *Sukuk BTN Phase III 2024*	80.956	13 tahun/*years*	*27* Desember/ *December 27, 2037*	*27,40%****
Sukuk BTN I Tahun 2024 Tahap IV/ *Sukuk BTN Phase IV 2024*	52.444	13 tahun/*years*	*23* September/ *September 23, 2038*	*27,40%****
Dolar Amerika Serikat/*United States Dollar*				
BBTN September or Global Bond 2020/ *BBTN September or Global Bond 2020*	300.000.000	5 tahun/*years*	23 Januari/ *January 23, 2025*	4,20% tetap/ *fixed*

***) 11% dari pendapatan yang dibagi hasilkan dengan indikasi bagi hasil sebesar 0,55% per tahun.
****) 27,40% dari pendapatan yang dibagi hasilkan dengan indikasi bagi hasil sebesar 1,37% per tahun.

****) 11% of the income generated with the indication of profit sharing of 0.55% per year*
*****) 27.40% of the income generated with the indication of profit sharing of 1.37% per year*

d. Penawaran Umum Saham Perdana (IPO)

Bank telah memperoleh izin untuk melakukan Penawaran Umum sesuai dengan persetujuan Dewan Perwakilan Rakyat Republik Indonesia yang tertuang dalam Surat Ketua Dewan Perwakilan Rakyat Republik Indonesia No.PW.01/3104/ DPRRI/V/2009 tanggal 29 Mei 2009, serta penetapan dari Pemerintah sebagaimana tertuang dalam Peraturan Pemerintah Republik Indonesia No. 66 tahun 2009 dan diundangkan dalam Lembaran Negara No.167 tanggal 16 November 2009 tentang Perubahan Struktur Kepemilikan Saham Negara Melalui Penerbitan dan Penjualan Saham Baru Pada PT Bank Tabungan Negara (Persero).

d. Initial Public Offering (IPO)

The Bank obtained a permit to undertake a Public Offering based on the approval of the House of Representatives of the Republic of Indonesia in its Chairman Letter No. PW.01/3104/DPRRI/V/2009 dated May 29, 2009 and was enacted by the Government as stipulated by the Republic of Indonesia Government Regulation No. 66 of 2009 and circulated in State Gazette No. 167 dated November 16, 2009 regarding the amendment of the stock ownership structure of the State through Initial Public Offering of the shares of PT Bank Tabungan Negara (Persero).

1. UMUM (lanjutan)

d. Penawaran Umum Saham Perdana (IPO) (lanjutan)

Berdasarkan Surat Badan Pengawas Pasar Modal dan Lembaga Keuangan (BAPEPAM-LK) No. S-10523/BL/2009 tanggal 8 Desember 2009, pernyataan pendaftaran yang diajukan Bank dalam rangka IPO sejumlah 6.353.999.999 lembar Saham Biasa Atas Nama Seri B milik Negara Republik Indonesia dan 2.360.057.000 lembar Saham Biasa Atas Nama Seri B baru, dengan nilai nominal sebesar Rp500 (Rupiah penuh) setiap saham kepada masyarakat telah menjadi efektif pada tanggal 8 Desember 2009. Saham yang ditawarkan tersebut dicatatkan dan mulai diperdagangkan di Bursa Efek Indonesia pada tanggal 17 Desember 2009 dengan harga jual Rp800 (Rupiah penuh) per saham.

Berkaitan dengan penawaran umum saham perdana, Bank telah mengimplementasikan program kepemilikan saham oleh Manajemen dan Karyawan (*Management and Employee Stock Allocation*/MESA). Program MESA diberikan maksimal 9,62% dari saham baru yang diterbitkan kepada karyawan yang tercatat pada tanggal 31 Desember 2009. Program MESA tersebut telah efektif pada tanggal 17 September 2009 dan seluruh karyawan yang memiliki kualifikasi telah mengambil program tersebut dengan jumlah lembar saham biasa atas nama Seri B sebanyak 226.928.500 lembar (nilai nominal Rp500 per lembar saham) dengan harga beli Rp640 per lembar saham (setelah diskon 20% dari harga penawaran perdana sebesar Rp800 per lembar saham) dengan masa *lock up* selama enam bulan.

Diskon harga saham untuk program MESA menjadi beban Bank di tahun 2009, yaitu sebesar 20% atau Rp41.353, yang termasuk beban pajak penghasilan.

1. GENERAL (continued)

d. Initial Public Offering (IPO) (continued)

Based on Letter No. S-10523/BL/2009 of the Capital Market and Financial Institutions Supervisory Agency (BAPEPAM-LK) dated December 8, 2009, the Registration Statement submitted by the Bank relating to the IPO of 6,353,999,999 ordinary shares Series B of the Republic of Indonesia and 2,360,057,000 new ordinary shares Series B, at par value of Rp500 (full Rupiah) per share to the public, became effective on December 8, 2009. The shares which were offered to the public, were listed and traded on the Indonesia Stock Exchange on December 17, 2009, with the selling price of Rp800 (full Rupiah) per share.

In relation to the Initial Public Offering of the shares, the Bank implemented the Management and Employee Stock Allocation (MESA) program. MESA program is allocated with a maximum of 9.62% of the newly issued shares for registered employees as of December 31, 2009. The MESA Program became effective on September 17, 2009 and all qualified employees availed of the program consisting of 226,928,500 Series B shares (with par value of Rp500 per share) with a purchase price of Rp640 per share (after share price discount of 20% from the initial public offering price of Rp800 per share) and a lock up period until six months.

In relation to the Initial Public Offering of the share price discount for MESA program was recognized as the Bank's expense in 2009, amounting to 20% or Rp41,353 including the income tax expense.

1. UMUM (lanjutan)

e. Program Opsi Kepemilikan Saham untuk Manajemen dan Karyawan

Sesuai dengan RUPS Luar Biasa tanggal 12 Oktober 2009, pemegang saham menyetujui penerbitan saham opsi sebanyak 363.085.500 lembar saham yang akan dilaksanakan dalam 3 (tiga) tahap. Opsi saham diberikan kepada manajemen dan karyawan pada posisi dan jabatan tertentu yang memenuhi Persyaratan yang telah ditetapkan (*Management & Employee Stock Option Plan* (MESOP)).

Manajemen dan karyawan Bank telah melakukan eksekusi atas opsi saham yang dimulai tahun 2011 dengan rincian untuk MESOP I dengan akhir hak opsi pada tahun 2014 sebanyak 145.234.500, MESOP II dengan akhir hak opsi pada tahun 2015 sebanyak 108.925.500 lembar saham, dan MESOP III dengan akhir hak opsi pada tahun 2016 sebanyak 108.925.500 lembar saham. Agio yang timbul dari eksekusi tersebut untuk tahun 2011 adalah sebesar Rp94.733, tahun 2012 adalah sebesar Rp6.349, tahun 2013 adalah sebesar Rp232.261, tahun 2014 adalah sebesar Rp2.372, tahun 2015 adalah sebesar Rp18.462, tahun 2016 adalah sebesar Rp7.856.

f. Penawaran Umum Saham Terbatas I

Untuk memperkuat struktur permodalan, melalui persetujuan Rapat Umum Pemegang Saham Luar Biasa tanggal 7 November 2012 dan Surat Badan Pengawas Pasar Modal dan Lembaga Keuangan (BAPEPAM-LK) No. S-13001/BL/2012 tanggal 6 November 2012, Bank melakukan Penawaran Umum Terbatas I ("PUT I") dalam rangka penerbitan Hak Memesan Efek Terlebih Dahulu (HMETD) sebanyak 1.512.857.500 saham Seri B dengan nilai nominal sebesar Rp500 (nilai penuh) setiap saham. Setiap pemegang 555.000 saham lama berhak membeli 94.943 saham baru dengan harga Rp1.235,00 (nilai penuh) setiap saham. Dari PUT I ini, Bank meningkatkan modal sahamnya sebanyak 1.512.857.500 lembar saham Seri B yang diterbitkan kepada masyarakat umum pada tanggal 4 Desember 2012 dan terdaftar di Bursa Efek Indonesia.

1. GENERAL (continued)

e. Management & Employee Stock Option Plan (MESOP)

In accordance with the Extraordinary GMS on 12 October 2009, shareholders approved the issuance of 363,085,500 share options which will be implemented in 3 (three) stages. Stock options are granted to management and employees in certain positions and titles who meet the specified requirements (Management & Employee Stock Option Plan (MESOP)).

The Bank's management and employees have executed share options starting in 2011 with details for MESOP I with the end of the option rights in 2014 amounting to 145,234,500, MESOP II with the end of the option rights in 2015 amounting to 108,925,500 shares, and MESOP III with the end of the option rights in 2016 amounting to 108,925,500 shares. The agio from the execution in 2011 was Rp94,733, in 2012 it was Rp6,349, in 2013 it was Rp232,261, in 2014 it was Rp2,372, in 2015 it was Rp18,462, in 2016 it was amounting to Rp7,856.

f. Limited Public Offering I

To Strengthen the capital structure, through the approval of the Extraordinary General Meeting of Shareholders on November 7, 2012 and on Letter No. S-13001/BL/2012 of the Capital Market and Financial Institutions Supervisory Agency (BAPEPAM-LK) dated November 6, 2012, the Bank undertook a Limited Public Offering I ("LPO I") through the issuance of pre-emptive rights of 1,512,857,500 Class B shares with a par value per share of Rp500 (full amount). Each holder of 555,000 share was entitled to buy 94,943 new shares for Rp1,235.00 (full amount) per share. As a result of LPO I, the Bank increased its capital by 1,512,857,500 Class B shares issued to the public on December 04, 2012 and the LPO I listed in the Indonesia Stock Exchanges.

1. UMUM (lanjutan)

g. Penawaran Umum Saham Terbatas II

Untuk memperkuat struktur permodalan, melalui persetujuan Rapat Umum Pemegang Saham Luar Biasa tanggal 18 Oktober 2022 dan surat OJK No. S-264/D.04/2022 tanggal 14 Desember 2022 perihal Pemberitahuan Efektifnya Pernyataan Pendaftaran, Bank melakukan Penawaran Umum Terbatas II ("PUT II") dalam rangka penerbitan Hak Memesan Efek Terlebih Dahulu (HMETD) sebanyak 3.444.444.413 saham Seri B dengan nilai nominal sebesar Rp500 (nilai penuh) setiap saham. Setiap pemegang 100.000.000 saham lama berhak membeli 32.525.443 saham baru dengan harga Rp1.200,00 (nilai penuh) setiap saham. Dari PUT II ini, Bank meningkatkan modal sahamnya sebanyak 3.444.444.413 lembar saham Seri B yang diterbitkan kepada masyarakat umum pada tanggal 10 Januari 2023 dan terdaftar di Bursa Efek Indonesia.

1. GENERAL (continued)

g. Limited Public Offering II

To Strengthen the capital structure, through the approval of the Extraordinary General Meeting of Shareholders on October 18, 2022 and Letter from OJK No. S-264/D.04/2022 dated December 14, 2022 about Notification of Effectiveness of Registration Statement, the Bank undertook a Limited Public Offering II ("LPO II") through the issuance of pre-emptive rights of 3,444,444,413 Class B shares with a par value per share of Rp500 (full amount). Each holder of 100,000,000 share was entitled to buy 32,525,443 new shares for Rp1,200.00 (full amount) per share. As a result of LPO II, the Bank increased its capital by 3,444,444,413 Class B shares issued to the public on January 10, 2023 and the LPO II listed in the Indonesia Stock Exchanges.

h. Dewan Komisaris, Direksi, Dewan Pengawas Syariah, Komite Audit dan Karyawan

Berdasarkan Rapat Umum Pemegang Saham Tahunan (RUPST) Bank tanggal 6 Maret 2024, dengan Akta Risalah RUPST No. 06 tanggal 6 Maret 2024 yang dibuat oleh Notaris Ashoya Ratam, S.H., M.Kn., susunan Dewan Komisaris Bank adalah sebagai berikut:

h. Boards of Commissioners, Directors, Sharia Supervisory Board, Audit Committee and Employees

Based on the Bank's The Annual General Meeting of Shareholders (AGMS) held on March 6, 2024, as stated under the Deed of AGMS Minutes No. 06 on March 6, 2024, by Notary Ashoya Ratam, S.H., M.Kn., the composition of the Bank's Board of Commissioners are as follows:

31 Desember 2024		***December 31, 2024***
Komisaris Utama/Independen	Chandra M. Hamzah	*President/Independent Commissioner*
Wakil Komisaris Utama/Independen	Iqbal Latanro	*Vice President/Independent Commissioner*
Komisaris	Andin Hadiyanto	*Commissioner*
Komisaris	Herry Trisaputra Zuna	*Commissioner*
Komisaris	Himawan Arief Sugoto	*Commissioner*
Komisaris Independen	Armand Bachtiar Arief	*Independent Commissioner*
Komisaris Independen	Sentot A. Sentausa	*Independent Commissioner*
Komisaris Independen	Bambang Widjanarko*	*Independent Commissioner*
Komisaris Independen	Adi Sulistyowati*	*Independent Commissioner*

* Diangkat sebagai anggota Dewan Komisaris PT Bank Tabungan Negara (Persero) Tbk berdasarkan hasil keputusan RUPS Tahunan Perseroan tanggal 6 Maret 2024 dan telah efektif menjabat sejak memperoleh persetujuan OJK pada tanggal 7 Oktober 2024 berdasarkan Surat OJK No. SR-438/PB.02/2024 tanggal 7 Oktober 2024.

* *Appointed as a member of Board of Commissioners of PT Bank Tabungan Negara (Persero) Tbk based on the Annual General Meeting of Shareholders dated March 6, 2024 has effectively served since receiving OJK approval on October 7, 2024 based on OJK Letter No. SR-438/PB.02/2024 dated October 7, 2024.*

1. UMUM (lanjutan)

h. Dewan Komisaris, Direksi, Dewan Pengawas Syariah, Komite Audit dan Karyawan (lanjutan)

Berdasarkan Rapat Umum Pemegang Saham Tahunan (RUPST) Bank tanggal 16 Maret 2023, dengan berita acara No. 16 yang dibuat oleh Notaris Ashoya Ratam, S.H., M.Kn., susunan Dewan Komisaris Bank adalah sebagai berikut:

31 Desember 2023		***December 31, 2023***
Komisaris Utama/Independen	Chandra M. Hamzah	*President/Independent Commissioner*
Wakil Komisaris Utama/Independen	Iqbal Latanro	*Vice President/Independent Commissioner*
Komisaris Independen	Armand Bachtiar Arief	*Independent Commissioner*
Komisaris Independen	Ahdi Jumhari Luddin**	*Independent Commissioner*
Komisaris Independen	Sentot A. Sentausa	*Independent Commissioner*
Komisaris	Andin Hadiyanto	*Commissioner*
Komisaris	Herry Trisaputra Zuna	*Commissioner*
Komisaris	Himawan Arief Sugoto	*Commissioner*
Komisaris	Mohamad Yusuf Permana*	*Commissioner*

* Diangkat sebagai anggota Dewan Komisaris PT Bank Tabungan Negara (Persero) Tbk berdasarkan hasil keputusan RUPS Luar Biasa Perseroan tanggal 11 Januari 2023 dan telah efektif pada tanggal 07 Juni 2023 berdasarkan Keputusan Dewan Komisioner OJK No. KEPR-46/D.03/2023 tanggal 07 Juni 2023.

** Berakhir masa jabatan tanggal 12 Agustus 2023 karena meninggal dunia.

** Appointed as a member of Board of Commissioners of PT Bank Tabungan Negara (Persero) Tbk based on the Annual General Meeting of Shareholders dated January 11, 2023 and has been effective on June 7, 2023 based on Financial Service Authority's Decision No. KEPR-46/D.03/2023 dated June 7, 2023.*

*** Ends of term of positions on August 12, 2023 due to passed away.*

Berdasarkan Rapat Umum Pemegang Saham Tahunan (RUPST) Bank tanggal 2 Maret 2022, dengan berita acara No. 04 yang dibuat oleh Notaris Ashoya Ratam, S.H., M.Kn., susunan Dewan Komisaris Bank adalah sebagai berikut:

31 Desember 2022		***December 31, 2022***
Komisaris Utama/Independen	Chandra M. Hamzah	*President/Independent Commissioner*
Wakil Komisaris Utama/Independen	Iqbal Latanro	*Vice President/Independent Commissioner*
Komisaris	Heru Budi Hartono****	*Commissioner*
Komisaris	Andin Hadiyanto	*Commissioner*
Komisaris	Herry Trisaputra Zuna***	*Commissioner*
Komisaris	Himawan Arief Sugoto**	*Commissioner*
Komisaris Independen	Armand Bachtiar Arief	*Independent Commissioner*
Komisaris Independen	Ahdi Jumhari Luddin	*Independent Commissioner*
Komisaris Independen	Sentot A. Sentausa*	*Independent Commissioner*

* Diangkat sebagai Anggota Komisaris PT Bank Tabungan Negara (Persero) Tbk berdasarkan hasil keputusan RUPS Tahunan Perseroan tanggal 2 Maret 2022 dan telah efektif pada tanggal 8 Agustus 2022 berdasarkan Keputusan Dewan Komisioner OJK No. 31/KDK.03/2022 tanggal 8 Agustus 2022.

** Diangkat sebagai Anggota Komisaris PT Bank Tabungan Negara (Persero) Tbk berdasarkan hasil keputusan RUPS Tahunan Perseroan tanggal 2 Maret 2022 dan telah efektif pada tanggal 3 Oktober 2022 berdasarkan Keputusan Dewan Komisioner OJK No. KEP-149/D.03/2022 tanggal 3 Oktober 2022.

*** Diangkat sebagai Anggota Komisaris PT Bank Tabungan Negara (Persero) Tbk berdasarkan hasil keputusan RUPS Tahunan Perseroan tanggal 2 Maret 2022 dan telah efektif pada tanggal 11 Oktober 2022 berdasarkan Keputusan Dewan Komisioner OJK No. KEP-162/D.03/2022 tanggal 11 Oktober 2022.

****Berdasarkan Surat Perseroan No. 582/DIR/CSD/X/2022 perihal Laporan Informasi atau Fakta Material tertanggal 14 Oktober 2022, masa jabatan Heru Budi Hartono selaku anggota Dewan Komisaris Perseroan berakhir sejak pelantikan dirinya menjadi Penjabat Gubernur Daerah Khusus Ibukota Jakarta pada tanggal 17 Oktober 2022. Sehubungan dengan berakhirnya masa jabatan Heru Budi Hartono tersebut, Perseroan akan menyelenggarakan Rapat Umum Pemegang Saham untuk memenuhi ketentuan peraturan perundang-undangan dan anggaran dasar Perseroan.

1. GENERAL (continued)

h. Boards of Commissioners, Directors, Sharia Supervisory Board, Audit Committee and Employees (continued)

Based on the Bank's The Annual General Meeting of Shareholders held on March 16, 2023, as stated under the notarial No. 16 by Notary Ashoya Ratam, S.H., M.Kn., the composition of the Bank's Board of Commissioners are as follows:

Based on the Bank's The Annual General Meeting of Shareholders held on March 2, 2022, as stated under the notarial No. 04 by Notary Ashoya Ratam, S.H., M.Kn., the composition of the Bank's Board of Commissioners are as follows:

** Appointed as the Board of Commissioner of PT Bank Tabungan Negara (Persero) Tbk, based on the Annual General Meeting of Shareholder dated March 2, 2022 and has been effective on August 8, 2022 based on Financial Service Authority's Decision No. 31/KDK.03/2022 dated August 8, 2022.*

*** Appointed as the Board of Commissioner of PT Bank Tabungan Negara (Persero) Tbk, based on the Annual General Meeting of Shareholder dated March 2, 2022 and has been effective on October 3, 2022 based on Financial Service Authority's Decision No. KEP-149/D.03/2022 dated October 3, 2022.*

**** Appointed as the Board of Commissioner of PT Bank Tabungan Negara (Persero) Tbk, based on the Annual General Meeting of Shareholder dated March 2, 2022 and has been effective on October 11, 2022 based on Financial Service Authority's Decision No. KEP-162/D.03/2022 dated October 11, 2022.*

***** Based on Company Letter No. 582/DIR/CSD/X/2022 regarding Report on Material Information or Facts dated October 14, 2022, Heru Budi Hartono's term of office as a member of the Company's Board of Commissioners ended since his inauguration as Acting Governor of the Special Capital Region of Jakarta on October 17, 2022. In connection with the expiration of Heru Budi Hartono, the Company will hold a General Meeting of Shareholders to comply with the provisions of the laws and regulations and the Company's articles of association.*

1. UMUM (lanjutan)

h. Dewan Komisaris, Direksi, Dewan Pengawas Syariah, Komite Audit dan Karyawan (lanjutan)

Berdasarkan Rapat Umum Pemegang Saham Tahunan (RUPST) Bank tanggal 6 Maret 2024, dengan Akta Risalah RUPST No. 06 tanggal 6 Maret 2024 yang dibuat oleh Notaris Ashoya Ratam, S.H., M.Kn., susunan Direksi Bank adalah sebagai berikut:

31 Desember 2024		
Direktur Utama	Nixon Lambok Pahotan Napitupulu	
Wakil Direktur Utama	Oni Febriarto Rahardjo	
Direktur *Finance*	Nofry Rony Poetra	
Direktur *Assets Management*	Elisabeth Novie Riswanti	
Direktur *Human Capital, Compliance and Legal*	Eko Waluyo	
Direktur *Risk Management*	Setiyo Wibowo	
Direktur *Distribution and Institutional Funding*	Jasmin	
Direktur *Information Technology*	Andi Nirwoto	
Direktur *Consumer*	Hirwandi Gafar	
Direktur *Operations and Customer Experience*	Hakim Putratama	
Direktur *SME and Retail Funding*	Muhammad Iqbal *	

* Diangkat sebagai anggota Dieksi PT Bank Tabungan Negara (Persero) Tbk berdasarkan hasil keputusan RUPS Tahunan Perseroan tanggal 6 Maret 2024 dan telah efektif menjabat sejak memperoleh persetujuan OJK pada tanggal 8 Agustus 2024 berdasarkan Surat OJK No. SR-333/PB.02/2024 tanggal 8 Agustus 2024.

Berdasarkan Rapat Umum Pemegang Saham Tahunan (RUPST) Bank tanggal 16 Maret 2023, dengan berita acara No. 16 yang dibuat oleh Notaris Ashoya Ratam, SH., MKn, susunan Direksi Bank adalah sebagai berikut:

31 Desember 2023		
Direktur Utama	Nixon Lambok Pahotan Napitupulu*	
Wakil Direktur Utama	Oni Febriarto Rahardjo**	
Direktur *IT and Digital*	Andi Nirwoto	
Direktur *Assets Management*	Elisabeth Novie Riswanti	
Direktur *Distribution and Funding*	Jasmin	
Direktur *Risk Management*	Setiyo Wibowo	
Direktur *Consumer*	Hirwandi Gafar	
Direktur *Finance*	Nofry Rony Poetra	
Direktur *Human Capital, Compliance and Legal*	Eko Waluyo	
Direktur *Institutional Banking*	Hakim Putratama***	

* Menerima pengalihan tugas sebagai Direktur Utama PT Bank Tabungan Negara (Persero) Tbk, berdasarkan hasil keputusan RUPS Tahunan Perseroan tanggal 16 Maret 2023 dan telah efektif pada tanggal 07 Juni 2023 berdasarkan Keputusan Dewan Komisioner OJK No. KEPR-44/D.03/2023 tanggal 07 Juni 2023.

** Diangkat sebagai Wakil Direktur Utama PT Bank Tabungan Negara (Persero) Tbk berdasarkan hasil keputusan RUPS Tahunan Perseroan tanggal 16 Maret 2023 dan telah efektif pada tanggal 07 Juni 2023 berdasarkan Keputusan Dewan Komisioner OJK No. KEPR-45/D.03/2023 tanggal 07 Juni 2023.

*** Diangkat sebagai anggota Direksi PT Bank Tabungan Negara (Persero) Tbk berdasarkan hasil keputusan RUPS Tahunan Perseroan tanggal 16 Maret 2023 dan telah efektif pada tanggal 26 Juli 2023 berdasarkan Keputusan Dewan Komisioner OJK No. KEPR-83/D.03/2023 tanggal 26 Juli 2023.

1. GENERAL (continued)

h. Boards of Commissioners, Directors, Sharia Supervisory Board, Audit Committee and Employees (continued)

Based on the Bank's The Annual General Meeting of Shareholders held on March 6, 2024, as stated under the Deed of AGMS Minutes No. 06 on March 6, 2024, by Notary Ashoya Ratam, S.H., M.Kn., the composition of the Bank's Board of Directors are as follows:

December 31, 2024		
President Director	Nixon Lambok Pahotan Napitupulu	
Vice President Director	Oni Febriarto Rahardjo	
Director of Finance	Nofry Rony Poetra	
Director of Assets Management	Elisabeth Novie Riswanti	
Director of Human Capital, Compliance and Legal	Eko Waluyo	
Director of Risk Management	Setiyo Wibowo	
Director of Distribution and Institutional Funding	Jasmin	
Director of Information Technology	Andi Nirwoto	
Director of Consumer	Hirwandi Gafar	
Director of Operations and Customer Experience	Hakim Putratama	
Director of SME and Retail Funding	Muhammad Iqbal *	

** Appointed as a member of Board of Directors of PT Bank Tabungan Negara (Persero) Tbk based on the Annual General Meeting of Shareholders dated March 6, 2024 and has effectively served since receiving OJK approval on August 8, 2024 based on OJK Letter No. SR-333/PB.02/2024 dated August 8, 2024 .*

Based on the Bank's The Annual General Meeting of Shareholders held on March 16, 2023, as stated under the notarial No. 16 by Notary Ashoya Ratam, S.H., M.Kn., the composition of the Bank's Board of Directors are as follows:

December 31, 2023		
President Director	Nixon Lambok Pahotan Napitupulu*	
Vice President Director	Oni Febriarto Rahardjo**	
Director of IT and Digital	Andi Nirwoto	
Director of Assets Management	Elisabeth Novie Riswanti	
Director of Distribution and Funding	Jasmin	
Director of Risk Management	Setiyo Wibowo	
Director of Consumer	Hirwandi Gafar	
Director Finance	Nofry Rony Poetra	
Director of Human Capital, Compliance and Legal	Eko Waluyo	
Director of Institutional Banking	Hakim Putratama***	

** Receive assignment transfer as President Director of The Borad of Directors of PT Bank Tabungan Negara (Persero) Tbk based on the Annual General Meeting of Shareholders dated March 16, 2023 and has been effective on June 7, 2023 based on Financial Service Authority's Decision No. KEPR-44/D.03/2023 dated June 7, 2023.*

*** Appointed as Vice President Director of PT Bank Tabungan Negara (Persero) Tbk based on the Annual General Meeting of Shareholders dated March 16, 2023 and has been effective on June 7, 2023 based on Financial Service Authority's Decision No. KEPR-45/D.03/2023 dated June 7, 2023.*

**** Appointed as a member of Board of Directors of PT Bank Tabungan Negara (Persero) Tbk based on the Annual General Meeting of Shareholders dated March 16, 2023 and has been effective on July 26, 2023 based on Financial Service Authority's Decision No. KEPR-83/D.03/2023 dated July 26, 2023.*

1. UMUM (lanjutan)

h. Dewan Komisaris, Direksi, Dewan Pengawas Syariah, Komite Audit dan Karyawan (lanjutan)

Berdasarkan Rapat Umum Pemegang Saham Tahunan (RUPST) Bank tanggal 2 Maret 2022, dengan berita acara No. 04 yang dibuat oleh Notaris Ashoya Ratam, S.H., M.Kn., susunan Direksi Bank adalah sebagai berikut:

1. GENERAL (continued)

h. Boards of Commissioners, Directors, Sharia Supervisory Board, Audit Committee and Employees (continued)

Based on the Bank's The Annual General Meeting of Shareholders (AGMS) held on March 2, 2022, as stated under the notarial No. 04 by Notary Ashoya Ratam, S.H., M.Kn., the composition of the Bank's Board of Directors are as follows:

31 Desember 2022		***December 31, 2022***
Direktur Utama	Haru Koesmahargyo*	*President Director*
Wakil Direktur Utama	Nixon Lambok Pahotan Napitupulu	*Vice President Director*
Direktur *Consumer*	Hirwandi Gafar	*Director of Consumer*
Direktur *Finance*	Nofry Rony Poetra	*Director of Finance*
Direktur *Human Capital, Compliance and Legal*	Eko Waluyo	*Director of Human Capital, Compliance and Legal*
Direktur *Assets Management*	Elisabeth Novie Riswanti	*Director of Assets Management*
Direktur *IT and Digital*	Andi Nirwoto	*Director of IT and Digital*
Direktur *Distribution and Funding*	Jasmin	*Director of Distribution and Funding*
Direktur *Risk Management*	Setiyo Wibowo	*Director of Risk Management*

* Berdasarkan Risalah Rapat Umum Pemegang Saham Tahunan dengan Akta nomor 16 tertanggal 16 Maret 2023, perseroan memberhentikan dengan hormat Haru Koesmahargyo selaku Direktur Utama Perseroan.

** Based on Annual General Meeting of Shareholders with notarial deed number 16 dated March 16, 2023, the company terminate with honor Haru Koesmahargyo as President Director.*

Gaji dan kompensasi lainnya yang dibayarkan kepada dewan komisaris adalah sebesar Rp76.260, Rp64.480 dan Rp51.960 masing-masing untuk tahun yang berakhir pada tanggal 31 Desember 2024, 2023 dan 2022 (Catatan 44b). Gaji dan kompensasi lainnya yang dibayarkan kepada direksi adalah sebesar Rp199.832, Rp161.529 dan Rp131.671 masing-masing untuk tahun yang berakhir pada tanggal 31 Desember 2024, 2023 dan 2022 (Catatan 44b).

Salaries and other compensation benefits paid to the Board of Commissioners of the Bank amounted to Rp76,260, Rp64,480 and Rp51,960 for the years ended December 31, 2024, 2023, and 2022, respectively (Note 44b). Salaries and other compensation benefits paid to the Board of Directors of the Bank amounted to Rp199,832, Rp161,529 and Rp131,671 for the years ended December 31, 2024, 2023, and 2022, respectively (Note 44b).

Sekretaris Perusahaan dan Kepala Divisi Audit Internal Bank adalah sebagai berikut:

The Bank's Corporate Secretary and the Head of Internal Audit Division are as follows:

31 Desember 2024		***December 31, 2024***
Sekretaris Perusahaan	Ramon Armando	*Corporate Secretary*
Kepala Divisi Audit Internal	Hendratno Tri Wibowo	*Head of Internal Audit Division*

31 Desember 2023		***December 31, 2023***
Sekretaris Perusahaan	Ramon Armando*	*Corporate Secretary*
Kepala Divisi Audit Internal	Hendratno Tri Wibowo	*Head of Internal Audit Division*

* Diangkat berdasarkan Surat Keputusan Direksi Bank No. 231/DIR/2023 tanggal 14 April 2023 dan bertindak sebagai pejabat sejak tanggal 14 April 2023.

** Appointed based on the Bank's Board of Directors' Decision Letter No. 231/DIR/2023 dated April 14, 2023 and Head of Corporate Secretary Division since April 14, 2023.*

1. UMUM (lanjutan)

h. Dewan Komisaris, Direksi, Dewan Pengawas Syariah, Komite Audit dan Karyawan (lanjutan)

Sekretaris Perusahaan dan Kepala Divisi Audit Internal Bank adalah sebagai berikut: (lanjutan)

1. GENERAL (continued)

h. Boards of Commissioners, Directors, Sharia Supervisory Board, Audit Committee and Employees (continued)

The Bank's Corporate Secretary and the Head of Internal Audit Division are as follows: (continued)

31 Desember 2022		***December 31, 2022***
Sekretaris Perusahaan	Achmad Chaerul*	*Corporate Secretary*
Kepala Divisi Audit Internal	Hendratno Tri Wibowo**	*Head of Internal Audit Division*

* Diangkat berdasarkan Surat Keputusan Direksi Bank No. 711/DIR/2022 tanggal 7 Juli 2022 dan bertindak sebagai pejabat sejak tanggal 11 Juli 2022.

** Diangkat berdasarkan Surat Keputusan Direksi Bank No. 642/DIR/2021 tanggal 26 Juli 2021 dan bertindak sebagai pejabat sejak tanggal 26 Juli 2021.

** Appointed based on the Bank's Board of Directors' Decision Letter No. 711/DIR/2022 dated July 7, 2022 and Head of Corporate Secretary Division since July 11, 2022.*

*** Appointed based on the Bank's Board of Directors' Decision Letter No.* 642/DIR/2021 *dated July 26, 2021 and as the Acting Task of Internal Audit Division Head since July 26, 2021.*

Susunan Dewan Pengawas Syariah Bank, Rapat Umum Pemegang Saham Tahunan (RUPST) Bank tanggal 6 Maret 2024, dengan Akta Risalah RUPST No. 06 tanggal 6 Maret 2024 yang dibuat oleh Notaris Ashoya Ratam, S.H., M.Kn., adalah sebagai berikut:

The composition of the Bank's Sharia Supervisory Board based on the Bank's The Annual General Meeting of Shareholders held on March 6, 2024, as stated under Deed of AGMS Minutes No. 06 on March 6, 2024, by Notary Ashoya Ratam, S.H., M.Kn., are as follows:

31 Desember 2024		***December 31, 2024***
Ketua	M. Quraish Shihab	*Chairman*
Anggota	Mohammad Bagus Teguh Perwira	*Member*
Anggota	Muhammad Faiz	*Member*

Susunan Dewan Pengawas Syariah Bank, Rapat Umum Pemegang Saham Tahunan (RUPST) Bank tanggal 16 Maret 2023, dengan berita acara No. 16 yang dibuat oleh Notaris Ashoya Ratam, S.H., M.Kn., adalah sebagai berikut:

The composition of the Bank's Sharia Supervisory Board based on the Bank's The Annual General Meeting of Shareholders held on March 16, 2023, as stated under the notarial No. 16 by Notary Ashoya Ratam, S.H., M.Kn., are as follows:

31 Desember 2023		***December 31, 2023***
Ketua	M. Quraish Shihab	*Chairman*
Anggota	Mohammad Bagus Teguh Perwira	*Member*
Anggota	Muhammad Faiz*	*Member*

* Diangkat sebagai anggota Dewan Pengawas Syariah PT Bank Tabungan Negara (Persero) Tbk berdasarkan hasil keputusan RUPS Tahunan Perseroan tanggal 16 Maret 2023, telah memperoleh persetujuan OJK pada tanggal 18 Oktober 2023 berdasarkan Surat OJK No. S-267/PB.02/2023 tanggal 18 Oktober 2023 dan efektif sejak persetujuan Dewan Komisaris tanggal 29 November 2023 berdasarkan Surat Dewan Komisaris PT Bank Tabungan Negara (Persero) Tbk No. 144/KOM/BTN/XI/2023 tanggal 29 November 2023.

** Appointed as a member of the Sharia Supervisory Board of PT Bank Tabungan Negara (Persero) Tbk based on the results of the Company's Annual GMS decision on March 16, 2023, having obtained OJK approval on October 18, 2023, based on OJK Letter No. S-267/PB.02/2023 dated October 18, 2023, and effective since the approval of the Board of Commissioners on November 29, 2023, based on the Letter of the Board of Commissioners of PT Bank Tabungan Negara (Persero) Tbk No. 144/KOM/BTN/XI/2023 dated November 29, 2023.*

1. UMUM (lanjutan)

h. Dewan Komisaris, Direksi, Dewan Pengawas Syariah, Komite Audit dan Karyawan (lanjutan)

Susunan Dewan Pengawas Syariah Bank berdasarkan Rapat Umum Pemegang Saham Tahunan (RUPST) Bank tanggal 2 Maret 2022, dengan berita acara No. 4 yang dibuat oleh Notaris Ashoya Ratam, S.H., M.Kn., adalah sebagai berikut:

1. GENERAL (continued)

h. Boards of Commissioners, Directors, Sharia Supervisory Board, Audit Committee and Employees (continued)

The composition of the Bank's Sharia Supervisory Board based on the Bank's The Annual General Meeting of Shareholders held on March 2, 2022, as stated under the notarial No. 4 by Notary Ashoya Ratam, S.H., M.Kn.,are as follows:

31 Desember 2022		***December 31, 2022***
Ketua	M. Quraish Shihab	*Chairman*
Anggota	Mohamad Hidayat*	*Member*
Anggota	Mohammad Bagus Tegus Perwira	*Member*

* Berdasarkan Risalah Rapat Umum Pemegang Saham Tahunan dengan Akta nomor 16 tertanggal 16 Maret 2023, perseroan memberhentikan dengan hormat Mohamad Hidayat selaku Anggota Dewan Pengawas Syariah Perseroan.

** Based on Annual General Meeting of Shareholders with notarial deed number 16 dated March 16, 2023, the company terminate with honor Mohamad Hidayat as Member of Sharia Supervisory Board.*

Susunan Anggota Komite Audit Bank berdasarkan Surat Dewan Komisaris No. 50/KOM/BTN/III/2024 tanggal 13 Maret 2024 adalah sebagai berikut:

The composition of the Bank's Audit Committee, based on the Bank's Board of Commissioners' Decision No. 50/KOM/BTN/III/2024 dated March 13, 2024 are as follows:

31 Desember 2024		***December 31, 2024***
Ketua merangkap anggota	Iqbal Latanro	*Chairman concurrently as a Member*
Anggota	Sentot A. Sentausa	*Member*
Anggota	Bambang Widjanarko*	*Member*
Anggota	Endang A.Suprijatna	*Member*
Anggota	Indra Jaka Aprilyanta**	*Member*

* Diangkat sebagai anggota Dewan Komisaris PT Bank Tabungan Negara (Persero) Tbk berdasarkan hasil keputusan RUPS Tahunan Perseroan tanggal 6 Maret 2024 dan telah efektif menjabat sejak memperoleh persetujuan dari Otoritas Jasa Keuangan (OJK) pada tanggal 7 Oktober 2024 berdasarkan Surat OJK No.SR-438/PB.02/2024 tanggal 7 Oktober 2024.

** Diangkat sebagai anggota Komite Audit PT Bank Tabungan Negara (Persero) Tbk berdasarkan Keputusan Dewan Komisaris PT Bank Tabungan Negara (Persero) Tbk No. 15/KOM/BTN/2024 tanggal 19 November 2024 tentang Pengangkatan Sdr. Indra Jaka Aprilyanta sebagai Anggota Komite Audit PT Bank Tabungan Negara (Persero) Tbk.

** Appointed as a member of Board of Commissioners of PT Bank Tabungan Negara (Persero) Tbk based on the Annual General Meeting of Shareholders dated March 6, 2024 has effectively served since receiving Financial Services Authority (OJK) approval on October 7, 2024 based on OJK Letter No.SR-438/PB.02/2024 dated October 7, 2024*

*** Appointed as a member of Audit Comittee of PT Bank Tabungan Negara (Persero) Tbk based on the Decree of the Board of Commissioners of PT Bank Tabungan Negara (Persero) Tbk No. 15/KOM/BTN/2024 dated November 19, 2024 concerning the Appointment of Mr. Indra Jaka Aprilyanta as Member of the Audit Committee of PT Bank Tabungan Negara (Persero) Tbk.*

Susunan Anggota Komite Audit Bank berdasarkan Surat Dewan Komisaris No. 101/KOM/BTN/VIII/2023 tanggal 14 Agustus 2023 adalah sebagai berikut:

The composition of the Bank's Audit Committee, based on the Bank's Board of Commissioners' Decision No. 101/KOM/BTN/VIII/2023 dated August 14, 2023 are as follows:

31 Desember 2023		***December 31, 2023***
Ketua merangkap anggota	Iqbal Latanro	*Chairman concurrently as a Member*
Anggota	Sentot A. Sentausa	*Member*
Anggota	Andin Hadiyanto	*Member*
Anggota	Peter Eko Budi Darwito	*Member*
Anggota	Endang A.Suprijatna	*Member*

1. UMUM (lanjutan)

h. Dewan Komisaris, Direksi, Dewan Pengawas Syariah, Komite Audit dan Karyawan (lanjutan)

Susunan Anggota Komite Audit Bank berdasarkan Surat Dewan Komisaris No. 111/KOM/BTN/XI/2022 tanggal 16 November 2022 adalah sebagai berikut:

31 Desember 2022		
Ketua merangkap anggota	Iqbal Latanro	
Anggota	Ahdi Jumhari Luddin	
Anggota	Andin Hadiyanto	
Anggota	Sentot A. Sentausa*	
Anggota	Adi Prakoso	
Anggota	Peter Eko Budi Darwito**	

* Diangkat sebagai anggota Komite Audit PT Bank Tabungan Negara (Persero) Tbk berdasarkan Surat Keputusan Dewan Komisaris Bank No. 03/KOM/BTN/2022 tanggal 17 Maret 2022 dan berlaku efektif berdasarkan Surat OJK Nomor 31/KDK.03/2022 tertanggal 8 Agustus 2022.

** Diperpanjang masa jabatan sebagai anggota Komite Audit PT Bank Tabungan Negara (Persero) Tbk berdasarkan Surat Keputusan Dewan Komisaris Bank No. 108/KOM/BTN/XI/2022 tanggal 9 November 2022

Berdasarkan ketentuan internal Bank, manajemen kunci Bank cakupannya adalah Dewan Komisaris, Komite Audit, Direksi, Kepala Kantor Wilayah, Kepala Divisi, dan Kepala Cabang. Jumlah karyawan tetap Bank pada tanggal 31 Desember 2024, 2023 dan 2022 masing-masing adalah 12.697, 11.270 dan 10.711 orang.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN

a. Dasar Penyajian Laporan Keuangan

Pernyataan Kepatuhan

Laporan keuangan pada tanggal dan untuk tahun yang berakhir pada tanggal-tanggal 31 December 2024, 2023 dan 2022 disusun dan disajikan sesuai dengan Standar Akuntansi Keuangan di Indonesia, yang mencakup Pernyataan dan Interpretasi yang dikeluarkan oleh Dewan Standar Akuntansi Keuangan Ikatan Akuntan Indonesia dan peraturan Bapepam-LK No. VIII.G.7 lampiran keputusan Ketua Bapepam-LK No. KEP-347/BL/2012 tanggal 25 Juni 2012 tentang "Penyajian dan Pengungkapan Laporan Keuangan Emiten atau Perusahaan Publik".

1. GENERAL (continued)

h. Boards of Commissioners, Directors, Sharia Supervisory Board, Audit Committee and Employees (continued)

The composition of the Bank's Audit Committee, based on the Bank's Board of Commissioners' Decision No. 111/KOM/BTN/XI/2022 dated November 16, 2022 are as follows:

December 31, 2022		
Chairman concurrently as a Member	Iqbal Latanro	Ketua merangkap anggota
Member	Ahdi Jumhari Luddin	Anggota
Member	Andin Hadiyanto	Anggota
Member	Sentot A. Sentausa*	Anggota
Member	Adi Prakoso	Anggota
Member	Peter Eko Budi Darwito**	Anggota

** Appointed as a member of the Bank's Audit Committee PT Bank Tabungan Negara (Persero) Tbk based on the Board of Commissioners Decision Letter No. 03/KOM/BTN/2022 dated March 17, 2022 and effective based on OJK Letter Number 31/KDK.03/2022 dated August 8, 2022.*

*** Appointed as a member of the Bank's Audit Committee PT Bank Tabungan Negara (Persero) Tbk based on the Board of Commissioners Decision Letter No. 108/KOM/BTN/XI/2022 dated November 9, 2022*

Based on the Bank's internal policy, key management consists of Board of Commissioners, Audit Committee, Board of Directors, Regional Office Head, Division Head, and Branch Manager. The Bank has permanent employees as of December 31, 2024, 2023 and 2022 of 12.697, 11,270 and 10,711 employees, respectively.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

a. Basis of Preparation of the Financial Statements

Statement of Compliance

The financial statements as of and for the year ended December 31, 2024, 2023 and 2022 were prepared and presented in accordance with Indonesian Financial Accounting Standards, which includes the Statements and Interpretations issued by the Financial Accounting Standards Board of the Indonesian Institute of Accountants and Bapepam-LK's Regulation No. VIII.G.7, Appendix of the Decision of the Chairman of Bapepam-LK No. KEP-347/BL/2012 dated June 25, 2012 regarding the "Guidelines on Financial Statements Presentations and Disclosures for Issuers or Public Companies".

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

a. Dasar Penyajian Laporan Keuangan (lanjutan)

Pernyataan Kepatuhan (lanjutan)

Laporan keuangan disusun sesuai dengan Pernyataan Standar Akuntansi Keuangan (PSAK) No.201 (Amandemen 2019), "Penyajian Laporan Keuangan".

Laporan keuangan unit syariah Bank yang didasarkan pada prinsip syariah disajikan sesuai dengan Pernyataan Standar Akuntansi Keuangan (PSAK) No. 401 (Revisi 2020) tentang "Penyajian Laporan Keuangan Syariah", PSAK No. 402 (Revisi 2020) tentang "Akuntansi *Murabahah*", PSAK No. 404 tentang "Akuntansi *Istishna*", PSAK No. 405 tentang "Akuntansi *Mudharabah*", PSAK No. 406 (Revisi 2020) tentang "Akuntansi *Musyarakah*" dan PSAK No. 107 tentang "Akuntansi *Ijarah*" yang menggantikan PSAK No. 59 tentang "Akuntansi Perbankan Syariah" yang berkaitan dengan pengakuan, pengukuran, penyajian dan pengungkapan untuk topik tersebut, PSAK No. 410 (Revisi 2020) tentang "Akuntansi *Sukuk*", PSAK No. 411 tentang "Akuntansi *Wa'd*" dan PSAK lain selama tidak bertentangan dengan prinsip syariah dan Pedoman Akuntansi Perbankan Syariah Indonesia (PAPSI) (revisi 2013).

Laporan keuangan telah disajikan berdasarkan nilai historis, kecuali untuk beberapa akun yang dinilai menggunakan dasar pengukuran lain sebagaimana dijelaskan pada kebijakan akuntansi dari akun tersebut. Laporan keuangan disusun dengan dasar akrual, kecuali pendapatan dari *istishna* dan bagi hasil dari pembiayaan *mudharabah* dan *musyarakah* serta laporan arus kas.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

a. Basis of Preparation of the Financial Statements (continued)

Statement of Compliance (continued)

The Financial Statements is presented in conformity with the Statement of Financial Accounting Standards ("SFAS") No.201 (Amendment 2019), "Presentation of Financial Statements".

The financial statements of the Bank's sharia unit have been presented in conformity with the Statement of Financial Accounting Standards ("SFAS") No. 401 (Revised 2020) on "Sharia Financial Statements Presentation", SFAS No. 402 (Revised 2020) on "Accounting for Murabahah", SFAS No. 404 on "Accounting for Istishna", SFAS No. 405 on "Accounting for Mudharabah", SFAS No. 406 (Revised 2020) on "Accounting for Musyarakah" and SFAS No. 407 on "Accounting for Ijarah", which supersede SFAS No. 59 on "Accounting for Sharia Banking" associated with recognition, measurement, presentation and disclosure for the respective topics, SFAS No. 410 (Revised 2020) on "Accounting for Sukuk", SFAS No. 411 on "Accounting for Wa'd" and other SFAS, as long as not contradict with sharia principles and the Indonesia Sharia Banking Accounting Guidelines (PAPSI) (revised 2013).

The Financial Statements have been prepared on a historical cost basis, except for some accounts that were assessed using another measurement basis as explained in the accounting policies of the account. The Financial Statements have been prepared on accrual basis, except for the revenue from istishna and the profit sharing from the mudharabah and musyarakah financing and the statement of cash flow.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

a. Dasar Penyajian Laporan Keuangan (lanjutan)

Pernyataan Kepatuhan (lanjutan)

Laporan arus kas disusun menggunakan metode langsung dan arus kas dikelompokkan atas dasar aktivitas operasi, investasi dan pendanaan. Kas dan setara kas terdiri dari kas, giro pada Bank Indonesia dan giro pada bank lain, penempatan pada Bank Indonesia dan bank lain, Sertifikat Bank Indonesia dan Sertifikat Deposito Bank Indonesia, yang jatuh tempo dalam waktu 3 (tiga) bulan sejak tanggal perolehan, sepanjang tidak digunakan sebagai jaminan atas pinjaman yang diterima serta tidak dibatasi penggunaannya.

Mata uang penyajian yang digunakan dalam laporan keuangan adalah Rupiah (Rp), yang merupakan mata uang fungsional Bank. Angka-angka yang disajikan dalam laporan keuangan, kecuali dinyatakan lain dibulatkan dalam jutaan Rupiah.

Berdasarkan PSAK No. 51 (Revisi 2003) tentang ”Akuntansi Kuasi-Reorganisasi”, kuasi-reorganisasi merupakan prosedur akuntansi yang mengatur perusahaan merestrukturisasi ekuitasnya dengan menghilangkan defisit dan menilai kembali seluruh aset dan liabilitasnya berdasarkan nilai wajar. Dengan kuasi-reorganisasi, perusahaan mendapatkan awal yang baik (*fresh start*) dengan laporan posisi keuangan yang menunjukkan nilai sekarang dan tanpa dibebani defisit karena defisit dieliminasikan menjadi nihil.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

a. Basis of Preparation of the Financial Statements (continued)

Statement of Compliance (continued)

The statement of cash flows has been prepared using direct method and the cash flows have been classified on the basis of operating, investing and financing activities. Cash and cash equivalents consist of cash, current accounts with Bank Indonesia and current accounts with other banks, placements with Bank Indonesia and other banks, Bank Indonesia Certificates and Deposits Certificates of Bank Indonesia maturing within 3 (three) months or less from the acquisition date provided they are neither pledged as collateral for borrowings nor restricted.

The presentation currency used in the financial statements is the Indonesian Rupiah (Rp), which is the Bank's functional currency. Unless otherwise stated, all figures presented in the financial statement are rounded off to millions of Rupiah.

Based on SFAS No. 51 (Revised 2003), "Accounting for Quasi-Reorganization", a quasi-reorganization is an accounting procedure that enables a company to restructure its equity by eliminating its deficit and revaluating all its assets and liabilities based on their fair values. Under a quasi-reorganization, a company will have a fresh start with its statement of financial position showing figures that represent present values and without the burden of a deficit because the deficit has been eliminated to nil.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

b. Perubahan Kebijakan Akuntansi

Pada tanggal 1 Januari 2024, terdapat standar baru dan penyesuaian atau amendemen terhadap beberapa standar yang masih berlaku dan berlaku efektif sejak tanggal tersebut yaitu sebagai berikut:

a. 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.

b. 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.

c. Nomenklatur Standar Akuntansi Keuangan

Standar ini ini mengatur penomoran baru untuk standar akuntansi keuangan yang berlaku di Indonesia yang diterbitkan oleh DSAK IAI.

d. Amendemen PSAK No. 1, "Penyajian Laporan Keuangan" tentang liabilitas jangka panjang dengan konvenan. Penerapan amendemen tersebut berlaku efektif sejak 1 Januari 2024 sesuai dengan perubahan tanggal berlaku efektifnya Amendemen PSAK No. 1 tentang "Penyajian Laporan Keuangan" terkait "Klasifikasi Liabilitas sebagai Jangka Pendek atau Jangka Panjang" yang sebelumnya berlaku efektif sejak 1 Januari 2023 menjadi 1 Januari 2024.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

b. Changes in Accounting Policy

On January 1, 2024, there were new standards and adjustments or amendments for several prevailing standards and effective since that date, as follows:

a. Pillars of Financial Accounting Standards

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 (PSAK),
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.

b. 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.

c. Nomenklatur Standar Akuntansi Keuangan

This standard regulates the new numbering for financial accounting standards applicable in Indonesia issued by DSAK IAI.

d. Amendment of SFAS No. 1: "Presentation of Financial Statements" regarding long-term liabilities with the convention. The application of the amendment is effective from January 1, 2024, in accordance with the change in the effective date of Amendment of SFAS No. 1 regarding "Presentation of Financial Statements" related to "Classification of Liabilities as Short Term or Long Term" which was previously became effective from January 1, 2023, will become January 1, 2024.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

b. Perubahan Kebijakan Akuntansi (lanjutan)

Pada tanggal 1 Januari 2024, terdapat standar baru dan penyesuaian atau amendemen terhadap beberapa standar yang masih berlaku dan berlaku efektif sejak tanggal tersebut yaitu sebagai berikut: (lanjutan)

e. Amendemen PSAK No. 73, "Sewa" terkait liabilitas sewa dalam jual dan sewa-balik. Amendemen tersebut mengadopsi seluruh pengaturan dalam Amendemen IFRS 16 tentang "Lease" terkait "Lease Liability in a Sale and Leaseback". Penerapan amendemen ini dimulai untuk periode tahun buku yang dimulai pada atau setelah tanggal 1 Januari 2024 dan penerapan lebih dini diperkenankan.

f. Amandemen PSAK No. 2 "Laporan Arus Kas" dan Amandemen PSAK No. 60 "Instrumen Keuangan: Pengungkapan tentang Pengaturan Pembiayaan Pemasok". Penerapan lebih dini diperkenankan.

Implementasi dari standar-standar tersebut tidak menghasilkan perubahan substansial terhadap kebijakan akuntansi Bank dan tidak memiliki dampak yang material terhadap laporan keuangan konsolidasian di tahun berjalan atau tahun sebelumnya.

c. Transaksi dengan pihak-pihak berelasi

Dalam menjalankan usahanya, Bank melakukan transaksi dengan pihak-pihak berelasi seperti yang didefinisikan dalam PSAK No. 224 tentang "Pengungkapan Pihak-pihak Berelasi".

Suatu pihak dianggap berelasi dengan Bank jika:

a) Suatu pihak yang secara langsung, atau tidak langsung yang melalui satu atau lebih perantara, suatu pihak (i) mengendalikan, atau dikendalikan oleh, atau berada di bawah pengendalian bersama, dengan Bank; (ii) memiliki pengaruh signifikan atas Bank; atau (iii) memiliki pengendalian bersama atas Bank;

b) Suatu pihak yang berada dalam kelompok usaha yang sama dengan Bank;

c) Suatu pihak yang merupakan ventura bersama di mana Bank sebagai *venturer*;

d) Suatu pihak adalah anggota dari personil manajemen kunci Bank;

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

b. Changes in Accounting Policy (continued)

On January 1, 2024, there were new standards and adjustments or amendments for several prevailing standards and effective since that date, as follows: (continued)

e. Amendment of SFAS No. 73: "Lease" regarding liabilities in sale-and-leaseback transactions. The amendment adopts the entire provision in IFRS Amendment 16 on "Lease" regarding "Lease Liability in Sale and Leaseback". Application of this amendment commences for the period of the financial year beginning on or after January 1, 2024, and early adoption is permitted.

f. Amendment to PSAK No. 2 "Cash Flow Statement" and Amendment to PSAK No. 60 "Financial Instruments: Disclosures about Supplier Financing Arrangements". Early application is permitted.

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 consolidated financial statements for current or prior financial years.

c. Transactions with related parties

In the normal course of its business, the Bank enters into transactions with related parties which are defined under SFAS No. 224, "Related Party Disclosures".

The Bank considers the following as its related parties:

a) A person who, directly or indirectly through one or more intermediaries, (i) controls, or is controlled by, or under common control with the Bank; (ii) has significant influence over the Bank; or (iii) has joint control over the Bank;

b) An entity which is a member of the same group as the Bank;

c) An entity which is a joint venture of a third party in which the Bank has ventured in;

d) A member of key management personnel of the Bank;

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

c. Transaksi dengan pihak-pihak berelasi (lanjutan)

e) Suatu pihak adalah anggota keluarga dekat dari individu yang diuraikan dalam butir (a) atau (d);

f) Suatu pihak adalah suatu program imbalan pasca kerja untuk imbalan kerja dari Bank atau entitas terkait Bank;

g) Suatu pihak adalah entitas yang dikendalikan, dikendalikan bersama atau dipengaruhi signifikan oleh beberapa entitas, langsung maupun tidak langsung, individu seperti diuraikan dalam butir (d) atau (e).

Transaksi dengan pihak-pihak berelasi dilakukan dengan syarat dan kondisi yang disetujui oleh kedua belah pihak dimana persyaratan tersebut mungkin tidak sama dengan transaksi yang dilakukan dengan pihak ketiga. Seluruh transaksi dan saldo yang material dengan pihak-pihak berelasi diungkapkan dalam catatan atas laporan keuangan yang relevan dan rinciannya telah disajikan dalam Catatan 44 atas laporan keuangan. Selanjutnya, saldo dan transaksi yang material antara Bank dan Pemerintah Negara Republik Indonesia (RI) dan entitas lain yang berelasi dengan Bank diungkapkan juga pada Catatan 44.

d. Aset keuangan dan liabilitas keuangan

Aset keuangan Bank terdiri dari kas, giro pada Bank Indonesia, giro pada bank lain, penempatan pada Bank Indonesia dan bank lain, efek-efek, obligasi Pemerintah, efek-efek yang dibeli dengan janji dijual kembali, tagihan derivatif, tagihan akseptasi, penyertaan saham, kredit yang diberikan dan pembiayaan/piutang syariah, bunga yang masih akan diterima dan aset lain-lain (tagihan kepada pihak ketiga).

Liabilitas keuangan Bank terdiri dari liabilitas segera, simpanan dari nasabah, simpanan dari bank lain, surat-surat berharga yang diterbitkan, liabilitas derivatif, liabilitas akseptasi, pinjaman yang diterima, pinjaman subordinasi, efek-efek yang dijual dengan janji dibeli kembali, bunga yang masih harus dibayar dan liabilitas lain-lain (setoran jaminan dan dana jaminan pengembang).

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

c. Transactions with related parties (continued)

e) A close family member of the person described in clause (a) or (d);

f) An entity which is a post-employment benefit plan for the benefit of employees of either the Bank or an entity related to the Bank;

g) An entity that is controlled, jointly controlled or significantly influenced, directly or indirectly by the person described in clause (d) or (e).

Transactions with related parties are made on the term and conditions agreed by both parties where such terms may not be the same as transactions undertaken with third parties. All material transactions and balances with related parties are disclosed in the relevant notes to the financial statements and the details have been presented in Note 44 of the financial statements. Furthermore, material transactions and balances between the Bank and the Government of the Republic of Indonesia (RI) and other entities related to the Bank are also disclosed in Note 44.

d. Financial assets and liabilities

The Bank's financial assets consist of cash, current accounts with Bank Indonesia, current accounts with other banks, placements with Bank Indonesia and other banks, securities, government bonds, securities purchased under agreement to resell, derivatives receivable, acceptance receivable, investment in shares, loans and sharia financing/receivables, interest receivable and other assets (third party receivables).

The Bank's financial liabilities consist of liabilities due immediately, deposits from customers, deposits from other banks, securities issued, derivatives payable, acceptance payable, fund borrowings, subordinated loan, securities sold under repurchase agreements, interest payable and other liabilities (guarantee deposits and developers' security deposits).

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

d. Aset keuangan dan liabilitas keuangan (lanjutan)

(i) Klasifikasi

Bank mengklasifikasikan aset keuangan berdasarkan kategori sebagai berikut pada saat pengakuan awal:

- Aset keuangan yang diukur pada nilai wajar melalui laba rugi;
- Aset keuangan yang diukur pada biaya perolehan diamortisasi;
- Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain (FVTOCI).

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.

Bank melakukan pengujian karakteristik arus kas kontraktual dari aset keuangan yang dikelola untuk mengetahui karakteristik arus kas kontraktual berasal hanya dari pembayaran pokok dan bunga dari jumlah pokok terutang (*Solely Payment of Principal and Interest* atau Pass SPPI) yang konsisten dengan pengaturan pinjaman dasar (*Basic Lending Agreement*). Dalam melakukan penilaian, Bank mempertimbangkan:

- Imbalan untuk nilai waktu dari uang;
- *Leverage;*
- Variabilitas pada waktu dan jumlah arus kas;
- Instrumen yang terkait secara kontraktual;
- Pembayaran dipercepat;
- Ketentuan kontrak tidak sah dan *de minimis*

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

d. Financial assets and liabilities (continued)

(i) Classification

The Bank classified its financial assets in the following categories on initial recognition:

- *Financial assets held at fair value through profit or loss (FVTPL);*
- *Financial assets held at amortized cost;*
- *Financial assets held at fair value through other comprehensive income (FVTOCI).*

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.

The Bank assess the contractual cash flow characteristics of financial assets to determine the characteristics of contractual cash flows only from the payment of principal and interest from the outstanding principal (Solely Payment of Principal and Interest or Pass SPPI) that is consistent with basic lending agreement. In making the assessment, the Bank considers:

- *The time value of money element of interest;*
- *Leverage;*
- *Variability in timing or amount of cash flows;*
- *Contractually linked instruments;*
- *Prepayment;*
- *Non-genuine features and de minimis.*

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

d. Aset keuangan dan liabilitas keuangan (lanjutan)

(i) Klasifikasi (lanjutan)

Aset keuangan diukur pada biaya perolehan amortisasi jika kedua kondisi berikut terpenuhi:
- Aset keuangan yang dikelola dalam model bisnis yang bertujuan untuk memiliki aset keuangan dalam rangka mendapatkan arus kas kontraktual; dan
- Arus kas kontraktual tersebut semata dari pembayaran pokok dan bunga (SPPI).

Aset keuangan diukur pada nilai wajar melalui penghasilan komprehensif lain (FVTOCI) jika kedua kondisi berikut terpenuhi:
- Aset keuangan yang dikelola untuk mendapatkan arus kas kontraktual dan menjual aset keuangan; dan
- Arus kas kontraktual tersebut semata dari pembayaran pokok dan bunga (SPPI).

Aset keuangan diklasifikasikan pada nilai wajar melalui laba rugi (FVTPL) jika tidak memenuhi kondisi yang disyaratkan untuk diukur pada biaya perolehan amortisasi atau nilai wajar melalui penghasilan komprehensif lain.

(ii) Pengakuan awal

a. Pembelian atau penjualan aset keuangan yang memerlukan penyerahan aset dalam kurun waktu yang telah ditetapkan oleh peraturan dan kebiasaan yang berlaku di pasar (pembelian secara reguler) diakui pada tanggal penyelesaian.

b. Aset keuangan dan liabilitas keuangan pada awalnya diukur pada nilai wajarnya. Dalam hal aset keuangan atau liabilitas keuangan tidak diukur pada nilai wajar melalui laba rugi. Nilai wajar tersebut ditambah/dikurangkan biaya transaksi yang dapat diatribusikan secara langsung. Pengukuran aset keuangan dan liabilitas keuangan setelah pengakuan awal tergantung pada klasifikasinya.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

d. Financial assets and liabilities (continued)

(i) Classification (continued)

Financial assets are measured at amortized cost if both of the following conditions are met:
- *Financial assets are managed where the business model objectives in order to collect the contractual cash flows; and*
- *The contractual cash flows are solely payments of principal and interest (SPPI).*

Financial assets are measured at fair value through other comprehensive income (FVTOCI) if both of the following conditions are met:
- *Financial assets are managed to collect the contractual cash flows and sell the assets; and*
- *The contractual cash flows are solely payments of principal and interest (SPPI).*

Financial assets are measured at fair value through profit or loss (FVTPL) if do not meet the conditions required to be measured at amortized cost or fair value through other comprehensive income.

(ii) Initial recognition

a. Purchases or sales of financial assets that require delivery of assets within a time frame established by regulation or convention in the marketplace (regular way purchases) are recognized on the settlement date.

b. Financial assets and liabilities are initially recognised at fair value. For those financial assets or financial liabilities not measured at fair value through profit or loss. The fair value includes directly attributable transaction costs. The subsequent measurement of financial assets and liabilities depends on their classification.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

d. Aset keuangan dan liabilitas keuangan (lanjutan)

(ii) Pengakuan awal (lanjutan)

Biaya transaksi hanya meliputi biaya-biaya yang dapat diatribusikan secara langsung untuk perolehan suatu aset keuangan atau penerbitan suatu liabilitas keuangan dan merupakan biaya tambahan yang tidak akan terjadi apabila instrumen keuangan tersebut tidak diperoleh atau diterbitkan. Untuk aset keuangan, biaya transaksi ditambahkan pada jumlah yang diakui pada awal pengakuan aset, sedangkan untuk 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 pendapatan bunga untuk biaya transaksi sehubungan dengan aset keuangan atau sebagai bagian dari beban bunga untuk biaya transaksi sehubungan dengan liabilitas keuangan.

Bank, pada pengakuan awal, dapat menetapkan aset keuangan dan liabilitas keuangan tertentu sebagai nilai wajar melalui laba rugi (opsi nilai wajar). Opsi nilai wajar dapat digunakan hanya bila memenuhi ketetapan sebagai berikut:

- Penetapan sebagai opsi nilai wajar mengurangi atau mengeliminasi ketidak-konsistenan pengukuran dan pengakuan (*accounting mismatch*) yang dapat timbul; atau
- Aset keuangan dan liabilitas keuangan merupakan bagian dari portofolio instrumen keuangan yang risikonya dikelola dan dilaporkan kepada manajemen kunci berdasarkan nilai wajar; atau
- Aset keuangan dan liabilitas keuangan terdiri dari kontrak utama dan derivatif melekat yang harus dipisahkan.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

d. Financial assets and liabilities (continued)

(ii) Initial recognition (continued)

Transaction costs only include costs that are directly attributable to the acquisition of a financial asset or issuance of a financial liability and an additional charge that would not occur if the instrument is not acquired or issued. For financial assets, transaction costs are added to the amount recognized in the initial recognition of the asset, while for financial liabilities, transaction costs are deducted from the amount of debt recognized on initial recognition of a liability.

The transaction costs are amortized over the terms of the instrument based on the effective interest rate method and recorded as part of interest income for transaction costs related to the financial asset or as part of interest expense for transaction costs related to financial liabilities.

The Bank, upon initial recognition, may designate certain financial assets and liabilities, at fair value through profit or loss (fair value option). The fair value option is only applied when the following conditions are met:

- *The determination of the fair value option reduces or eliminates an accounting mismatch that would otherwise arise; or*
- *The financial assets and liabilities are part of a portfolio of financial instruments, the risks of which are managed and reported to key management on a fair value basis; or*
- *The financial assets and liabilities consist of a host contract and an embedded derivative that must be bifurcated.*

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

d. Aset keuangan dan liabilitas keuangan (lanjutan)

(ii) Pengakuan awal (lanjutan)

Opsi nilai wajar digunakan untuk kredit yang diberikan dan piutang tertentu yang dilindung nilai menggunakan *credit derivatives* atau *spot* suku bunga, namun tidak memenuhi kriteria untuk akuntansi lindung nilai. Jika tidak, kredit yang diberikan akan dicatat menggunakan biaya perolehan diamortisasi dan derivatif akan diukur menggunakan nilai wajar melalui laba rugi.

Opsi nilai wajar juga digunakan untuk dana investasi yang merupakan bagian dari portofolio yang dikelola dengan basis nilai wajar. Opsi nilai wajar juga digunakan untuk *structured investment* termasuk derivatif melekat.

(iii) Pengukuran setelah pengakuan awal

Aset keuangan dalam kelompok nilai wajar melalui penghasilan komprehensif lain dan aset keuangan dan liabilitas keuangan yang diukur pada nilai wajar melalui laba rugi diukur pada nilai wajarnya.

Aset dan liabilitas keuangan lainnya yang diukur pada biaya perolehan amortisasi, diukur pada biaya perolehan amortisasi dengan menggunakan metode suku bunga efektif.

(iv) Penghentian pengakuan

a. Aset keuangan dihentikan pengakuannya jika:

- Hak kontraktual atas arus kas yang berasal dari aset keuangan tersebut berakhir; atau

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

d. Financial assets and liabilities (continued)

(ii) Initial recognition (continued)

The fair value option is applied to certain loans and receivables that are hedged with credit derivatives or interest rate spot, but does not meet the criteria for hedge accounting. Otherwise, the loans would be recorded at amortized cost, while the derivatives are measured at fair value through profit or loss.

The fair value option is also applied to investment funds that are part of a portfolio managed on a fair value basis. Furthermore, the fair value option is applied to structured investments that include embedded derivatives.

(iii) Subsequent measurement

Fair value through other comprehensive income financial assets and financial assets and liabilities measured at fair value through profit or loss are subsequently measured at fair value.

Assets and other financial liabilities which are measured at amortized cost, are measured at amortized cost using the effective interest method.

(iv) Derecognition

a. Financial assets are derecognized when:

- *The contractual rights to receive cash flows from the financial assets have expired; or*

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

d. Aset keuangan dan liabilitas keuangan (lanjutan)

(iv) Penghentian pengakuan (lanjutan)

- Bank telah mentransfer hak-nya untuk menerima arus kas yang berasal dari aset keuangan atau menanggung liabilitas untuk membayarkan arus kas yang diterima tersebut secara penuh tanpa penundaan berarti kepada pihak ketiga di bawah kesepakatan pelepasan *(pass-through arrangement)*; dan antara (a) Bank telah mentransfer secara substansial seluruh risiko dan manfaat atas aset, atau (b) Bank tidak mentransfer maupun tidak memiliki secara substansial seluruh risiko dan manfaat atas aset, namun telah mentransfer pengendalian atas aset.

  Ketika Bank telah mentransfer hak untuk menerima arus kas dari aset atau telah memasuki *pass through arrangement* dan tidak mentransfer serta tidak mempertahankan secara substansial seluruh risiko dan manfaat atas aset atau tidak mentransfer kendali atas aset, aset diakui sebesar keterlibatan Bank yang berkelanjutan atas aset tersebut.

Kredit yang diberikan atau aset keuangan lain dihapusbukukan ketika tidak terdapat prospek yang realistis mengenai pengembalian kredit dalam waktu dekat atau hubungan normal antara Bank dan debitur telah berakhir. Kredit yang tidak dapat dilunasi, dihapusbukukan dengan mendebit cadangan kerugian penurunan nilai. Penerimaan kemudian atas kredit yang telah dihapusbukukan sebelumnya, jika pada periode berjalan dikreditkan ke dalam akun cadangan kerugian penurunan nilai atas kredit yang diberikan di laporan posisi keuangan, sedangkan jika setelah tanggal laporan posisi keuangan dikreditkan sebagai pendapatan operasional lainnya dalam laporan laba rugi dan penghasilan komprehensif lain.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

d. Financial assets and liabilities (continued)

(iv) Derecognition (continued)

- *The Bank has transferred its rights to receive cash flows arising from the financial assets or has assumed an obligation to pay the cash flows in full without significant delay to a third party under a 'pass-through arrangement'; and either (a) the Bank has transferred substantially all the risks and rewards of the asset, or (b) the Bank has neither transferred nor retained substantially all the risks and rewards of the asset, but has transferred the control of the asset.*

  When the Bank has transferred its rights to receive cash flows from an asset or has entered into a pass-through arrangement and has neither transferred nor retained substantially all the risks and rewards of the asset nor transferred control of the asset, the asset is recognized to the extent of the Bank's continuing involvement in the asset.

Loans or other financial assets are written off when there is no realistic prospect of collection in the near future or the normal relationship between the Bank and the borrowers has ceased to exist. When a loan is deemed uncollectible, it is written off against the related allowance for impairment losses. Subsequent recoveries from loans previously written off, are added to the allowance for impairment losses account in the statement of financial position, if recovered in the current year and are recognized in the statement of profit or loss and comprehensive income as other operating income, if recovered after the statement of financial position dates.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

d. Aset keuangan dan liabilitas keuangan (lanjutan)

(iv) Penghentian pengakuan (lanjutan)

b. Liabilitas keuangan dihentikan pengakuannya jika liabilitas keuangan tersebut berakhir, yaitu ketika liabilitas yang ditetapkan dalam kontrak dilepaskan atau dibatalkan atau kadaluwarsa.

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, seperti pertukaran atau modifikasi yang 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.

(v) Modifikasi atas Arus Kas Aset Keuangan

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

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

d. Financial assets and liabilities (continued)

(iv) Derecognition (continued)

b. Financial liabilities are derecognized when they are extinguished, i.e., liabilities stated in the contract are discharged, cancelled or expired.

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 statement of profit or loss and other comprehensive income.

(v) Modifications to Cash Flow of Financial Assets

An assessment of whether a financial asset has been modified substantially or not substantially is carried out by a business unit authorized to modify or restructure financial assets when the business unit carries out modification or restructuring of a financial asset.

Modifications to financial assets are considered substantial and the Bank will stop recognizing the original financial assets when:

a. The financial asset (or part thereof) expires, that is, if the debtor is legally released from primary responsibility for the asset (or part thereof), either through legal process or by the creditor entering into a new credit contract (for example, the equity conversion option); or

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

d. Aset keuangan dan liabilitas keuangan (lanjutan)

(v) Modifikasi atas Arus Kas Aset Keuangan (lanjutan)

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. 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.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

d. Financial assets and liabilities (continued)

(v) Modifications to Cash Flow of Financial Assets (continued)

b. Currency conversion.
The bank will then measure the modified financial assets either substantially or not substantially in the following manner:

a. Substantial Modification of Financial Assets:
1. When the contractual cash flows on a financial asset are renegotiated or modified (for example, when a credit is restructured) where the renegotiation or modification results in derecognition of the financial asset, the Bank will record the financial asset as a new/modified financial asset at the modification/negotiation date.

2. The difference between the gross carrying amount of the original financial asset and the fair value of the modified asset is recognized in profit or loss.

3. Income or costs incurred in connection with a modification event are recognized as part of the gain or loss on the modification.

4. Subsequently, the Bank assesses whether the new/modified financial assets are those that arise from deteriorating financial assets.

5. Recognition of interest income on assets originating from deteriorating financial assets is determined based on the risk-adjusted effective interest rate to discount the cash flows of modified financial assets.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

d. Aset keuangan dan liabilitas keuangan (lanjutan)

(v) Modifikasi atas Arus Kas Aset Keuangan (lanjutan)

a. Modifikasi Aset Keuangan yang Tidak Substansial:

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.
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

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

d. Financial assets and liabilities (continued)

(v) Modifications to Cash Flow of Financial Assets (continued)

a. Non-Substantial Modification of Financial Assets:

1. When the Bank renegotiates or modifies contractual cash flows for financial assets (among others when credit is restructured) that do not meet the criteria for substantial modification of financial assets above, the renegotiation or modification does not result in derecognition of 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.
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 amortized over the remaining term of the modified financial asset.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

d. Aset keuangan dan liabilitas keuangan (lanjutan)

(vi) Pengakuan pendapatan dan beban

a. Pendapatan dan beban bunga atas aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain serta aset keuangan dan liabilitas keuangan yang dicatat berdasarkan biaya perolehan diamortisasi, diakui pada laporan laba rugi dengan menggunakan metode suku bunga efektif.

Jumlah tercatat bruto aset keuangan adalah biaya perolehan diamortisasi aset keuangan sebelum disesuaikan dengan cadangan penurunan nilai.

Dalam menghitung pendapatan dan beban bunga, tingkat bunga efektif diterapkan pada jumlah tercatat bruto aset (ketika aset tersebut bukan aset keuangan memburuk) atau terhadap biaya perolehan diamortisasi dari liabilitas.

Untuk aset keuangan yang memburuk setelah pengakuan awal, pendapatan bunga dihitung dengan menerapkan tingkat bunga efektif terhadap biaya perolehan diamortisasi dari aset keuangan tersebut. Jika aset tersebut tidak lagi memburuk, maka perhitungan pendapatan bunga akan dihitung dengan menerapkan tingkat bunga efektif terhadap nilai tercatat bruto dari aset keuangan tersebut.

Untuk aset keuangan yang telah memburuk pada saat pengakuan awal, pendapatan bunga dihitung dengan menerapkan tingkat bunga efektif terhadap biaya perolehan diamortisasi dari aset keuangan tersebut. Jika aset tersebut tidak lagi memburuk, maka perhitungan pendapatan bunga akan tetap dihitung dengan menerapkan tingkat bunga efektif terhadap biaya perolehan diamortisasi dari aset keuangan tersebut.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

d. Financial assets and liabilities (continued)

(vi) Income and expense recognition

a. Interest income and expense on financial assets measured at fair value through other comprehensive income as well as financial assets and financial liabilities recorded at amortized cost are recognized in the statement of profit or loss using the effective interest method.

The gross carrying amount of a financial asset is the amortized cost of a financial asset before adjusting for allowance for impairment.

In calculating interest income and expenses, the effective interest rate is applied to the gross carrying amount of an asset (when the asset is not a deteriorated financial asset) or to the amortized cost of a liability.

For financial assets that deteriorated after initial recognition, interest income is calculated by applying an effective interest rate to the amortized cost of the financial assets. If the asset no longer deteriorates, the calculation of interest income will be calculated by applying an effective interest rate to the gross carrying amount of the financial asset.

For financial assets that have deteriorated at initial recognition, interest income is calculated by applying the effective interest rate to the amortized cost of the financial assets. If the asset no longer deteriorates, the calculation of interest income will still be calculated by applying the effective interest rate to the amortized cost of the financial asset.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

d. Aset keuangan dan liabilitas keuangan (lanjutan)

(vi) Pengakuan pendapatan dan beban (lanjutan)

b. Keuntungan dan kerugian atas aset keuangan (yaitu: instrumen utang yang dimiliki oleh Bank) yang diukur pada nilai wajar melalui penghasilan komprehensif lain (FVTOCI) diakui dalam penghasilan komprehensif lain, kecuali untuk kerugian penurunan nilai, sampai aset keuangan tersebut dihentikan pengakuannya, keuntungan atau kerugian kumulatif yang telah diakui sebelumnya dalam penghasilan komprehensif lain direklasifikasi dari ekuitas ke laba rugi sebagai penyesuaian reklasifikasi.

Keuntungan dan kerugian atas aset keuangan atau liabilitas keuangan yang diukur pada nilai wajar melalui laba rugi (FVTPL) diakui dalam laporan laba rugi, kecuali:

- Bagian dari hubungan lindung nilai;
- Investasi dalam instrumen ekuitas dan Bank telah memilih untuk menyajikan keuntungan dan kerugian atas investasi dalam penghasilan komprehensif lain;
- Liabilitas keuangan yang ditetapkan untuk diukur pada nilai wajar melalui laba rugi dan Bank disyaratkan untuk menyajikan dampak dari perubahan risiko kredit liabilitas dalam penghasilan komprehensif lain;
- Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan Bank disyaratkan untuk mengakui sebagian perubahan nilai wajar dalam penghasilan komprehensif lain.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

d. Financial assets and liabilities (continued)

(vi) Income and expense recognition (continued)

b. Gain and losses on financial assets (which is debt instrument hold by Bank) measured at fair value through other comprehensive income (FVTOCI) are recognized at other comprehensive income, except losses on impairment, until those financial instrument derecognized, unrealized gain and losses record on other comprehensive income reclassified from equity to profit and loss as reclassification adjustment.

Gain and losses on financial assets or financial liabilities measured at fair value through profit or loss (FVTPL) are recognized at statement of profit or loss, except:

- *Part of a hedging relationship;*
- *Investments in equity instruments and the Bank has chosen to present gains and losses on investment in other comprehensive income;*
- *Financial liabilities determined to be measured at fair value through profit or loss and the Bank is required to present the impact of changes in credit risk liabilities in other comprehensive income;*
- *Financial assets measured at fair value through other comprehensive income and the Bank is required to recognize some changes in fair value in the other comprehensive income.*

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

d. Aset keuangan dan liabilitas keuangan (lanjutan)

(vi) Pengakuan pendapatan dan beban (lanjutan)

Keuntungan atau kerugian atas aset keuangan yang diukur pada biaya perolehan amortisasi dan bukan merupakan bagian dari suatu hubungan lindung nilai diakui pada laporan laba rugi ketika aset keuangan dihentikan pengakuannya, direklasifikasi, melalui proses amortisasi atau dalam rangka mengakui keuntungan atau kerugian penurunan nilai.

Keuntungan atau kerugian dari liabilitas keuangan yang diukur pada biaya perolehan amortisasi dan bukan merupakan bagian dari suatu hubungan lindung nilai diakui dalam laporan laba rugi ketika liabilitas keuangan dihentikan pengakuannya dan melalui proses amortisasi.

(vii) Reklasifikasi aset keuangan

Reklasifikasi aset keuangan diperbolehkan jika dan hanya jika terjadi perubahan dalam model bisnis untuk mengelola aset keuangan.

Jika Bank mereklasifikasi aset keuangan sesuai dengan ketentuan di atas, Bank menerapkan reklasifikasi secara prospektif dari tanggal reklasifikasi. Bank tidak menyajikan kembali keuntungan, kerugian (termasuk keuntungan atau kerugian penurunan nilai), atau bunga yang diakui sebelumnya.

Reklasifikasi aset keuangan dari klasifikasi biaya perolehan yang diamortisasi ke klasifikasi nilai wajar melalui laba rugi dicatat sebesar nilai wajarnya. Selisih antara nilai tercatat dengan nilai wajar diakui sebagai keuntungan atau kerugian pada laba rugi.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

d. Financial assets and liabilities (continued)

(vi) Income and expense recognition (continued)

Gain or losses on financial assets measured at amortized cost and not part of a hedging relationship are recognized in the statement of profit or loss when the financial assets are derecognized, reclassified, through the amortization process or in order to recognize impairment gains or losses.

Gain or losses on liabilities instrument measured at amortized cost and not part of a hedging relationship are recognized in the statement of profit or loss when liabilities instrument are derecognized and through amortization processed.

(vii) Reclassification of financial assets

Reclassification of financial assets is permissible when and only when there is change in business model for managing financial assets.

If the Bank reclassifies financial assets in accordance with the above conditions, the Bank applies prospective reclassification from the date of reclassification. The Bank does not restate gains, losses (including impairment gains or losses), or previously recognized interest.

Reclassifications of financial assets from amortized cost classifications to fair value through profit or loss are recorded at fair value. The difference between the recorded value and fair value is recognized in profit or loss on the statement of profit or loss and other comprehensive income.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

d. Aset keuangan dan liabilitas keuangan (lanjutan)

(vii) Reklasifikasi aset keuangan (lanjutan)

Reklasifikasi aset keuangan dari klasifikasi biaya perolehan yang diamortisasi ke klasifikasi nilai wajar melalui penghasilan komprehensif lain dicatat sebesar nilai wajarnya.

Reklasifikasi aset keuangan dari klasifikasi nilai wajar melalui penghasilan komprehensif lain ke klasifikasi nilai wajar melalui laba rugi dicatat pada wajar. Keuntungan atau kerugian yang belum direalisasi direklasifikasi ke laba rugi.

Reklasifikasi aset keuangan dari klasifikasi nilai wajar melalui penghasilan komprehensif lain ke klasifikasi biaya perolehan yang diamortisasi dicatat pada nilai tercatat. Keuntungan atau kerugian yang belum direalisasi dihapus dari ekuitas dan disesuaikan terhadap nilai wajar.

Reklasifikasi aset keuangan dari klasifikasi nilai wajar melalui laba rugi ke klasifikasi nilai wajar melalui penghasilan komprehensif lain dicatat pada wajar.

Reklasifikasi aset keuangan dari kelompok dimiliki hingga jatuh tempo ke kelompok tersedia untuk dijual dicatat sebesar nilai wajarnya. Keuntungan atau kerugian yang belum direalisasi tetap dilaporkan dalam ekuitas dan diamortisasi menggunakan metode suku bunga efektif selama sisa umur aset keuangan tersebut.

(viii) Saling hapus

Aset keuangan dan liabilitas keuangan dilakukan saling hapus dan nilai bersihnya disajikan dalam 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 secara neto atau untuk merealisasikan aset dan menyelesaikan liabilitasnya secara simultan.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

d. Financial assets and liabilities (continued)

(vii) Reclassification of financial assets (continued)

Reclassifications of financial assets from amortized cost classifications to fair value classifications through other comprehensive are recorded at their fair values.

Reclassification of financial assets from fair value classification through other comprehensive income to fair value classification through profit or loss is recorded at fair value. Unrealized gains or losses are reclassified to profit or loss.

Reclassification of financial assets from fair value classifications through other comprehensive income to the amortized cost classification is recorded at carrying value. Unrealized gains or losses is removed from equity and is adjusted against the fair value.

Reclassifications on financial assets from fair value classification through profit or loss to fair value classification through other comprehensive income are recorded at fair value.

Reclassification of financial assets from held-to-maturity to available-for-sale category is recorded at fair value. Unrealized gains or losses are reported in equity and are amortized using effective interest method over the remaining life of the financial assets.

(viii) Offsetting

Financial assets and liabilities are offset and the net amount is presented in the statement of financial position when, and only when, the Bank has a legal right to offset the amounts and intends either to settle on a net basis or to realize the asset and settle the liability simultaneously.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

d. Aset keuangan dan liabilitas keuangan (lanjutan)

(viii) Saling hapus (lanjutan)

Hal yang berkekuatan hukum harus tidak kontinjen atas peristiwa di masa depan dan harus dapat dipaksakan di dalam situasi bisnis yang normal, peristiwa kegagalan atau kebangkrutan dari entitas atas seluruh pihak lawan.

Pendapatan dan beban disajikan dalam jumlah neto hanya jika diperkenankan oleh Standar Akuntansi Keuangan.

(ix) Pengukuran 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 antara pelaku pasar pada tanggal pengukuran.

Pengukuran nilai wajar mengasumsikan bahwa transaksi untuk menjual aset atau mengalihkan liabilitas terjadi:
- Di pasar utama untuk aset dan liabilitas tersebut; atau
- Jika tidak terdapat pasar utama, dipasar yang paling menguntungkan untuk aset atau liabilitas tersebut.

Nilai wajar suatu aset atau liabilitas diukur menggunakan asumsi yang akan digunakan pelaku pasar ketika menentukan harga aset dan liabilitas tersebut dengan asumsi bahwa pelaku pasar bertindak dalam kepentingan ekonomik terbaiknya.

Pengukuran nilai wajar aset non keuangan memperhitungkan kemampuan pelaku pasar untuk menghasilkan manfaat ekonomik dengan menggunakan aset dalam penggunaan tertinggi dan terbaiknya atau dengan menjualnya kepada pelaku pasar lain yang akan menggunakan aset tersebut dalam penggunaan tertinggi dan terbaiknya.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

d. Financial assets and liabilities (continued)

(viii) Offsetting (continued)

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 company or the counterparty.

Income and expenses are presented on a net basis only when permitted by the Financial Accounting Standards.

(ix) Fair value measurement

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.

Fair value measurement assumes the transaction to sell assets or transfer liabilities occurs:
- *In the primary market for such assets and liabilities; or*
- *If there is no primary market, in the most profitable market for these assets or liabilities.*

The fair value of an asset or liability is measured using the assumptions that would be use by market participants in determining the price of the asset and the liability assuming that market participants act in their best economic interests.

The measurement of the fair value of non-financial assets takes into account the ability of market participants to generate economic benefits by using the asset in the highest and best use or by selling them to other market participants that would use the asset in the highest and best use.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

d. Aset keuangan dan liabilitas keuangan (lanjutan)

(ix) Pengukuran nilai wajar (lanjutan)

Bank menggunakan teknik penilaian yang sesuai dalam keadaan dan dimana data yang memadai tersedia untuk mengukur nilai wajar, mengoptimalkan penggunaan input yang dapat diobservasi yang relevan dan meminimalkan penggunaan input yang tidak dapat diobservasi.

Semua aset dan liabilitas dimana nilai wajar diukur atau diungkapkan dalam laporan keuangan dapat dikategorikan pada level hirarki nilai wajar, berdasarkan tingkatan input terendah yang signifikan atas pengukuran nilai wajar secara keseluruhan:

- Tingkat 1 : harga kuotasian (tanpa penyesuaian) di pasar aktif untuk aset atau liabilitas yang identik yang dapat diakses pada tanggal pengukuran.
- Tingkat 2 : input selain harga kuotasian yang termasuk dalam level 1 yang dapat diobservasi untuk aset dan liabilitas, baik secara langsung atau tidak langsung.
- Tingkat 3 : input yang tidak dapat diobservasi untuk aset dan liabilitas.

Untuk aset dan liabilitas yang diakui pada laporan keuangan secara berulang, Bank menentukan apakah terjadi transfer antara level di dalam hirarki dengan cara mengevaluasi kategori (berdasarkan input level terendah yang signifikan dalam pengukuran nilai wajar) setiap akhir periode pelaporan.

Bank, untuk tujuan pengungkapan nilai wajar, telah menentukan kelas aset dan liabilitas berdasarkan sifat, karakteristik, risiko aset dan liabilitas, dan level hirarki nilai wajar (Catatan 46).

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

d. Financial assets and liabilities (continued)

(ix) Fair value measurement (continued)

Bank uses suitable valuation techniques in the circumstances and where sufficient data are available to measure fair value, optimizing the use of relevant observable inputs and minimize the use of inputs that are not observable.

All assets and liabilities which fair value is measured or disclosed in the financial statements can be classified in fair value hierarchy levels, based on the lowest level of input that is significant to the overall fair value measurement:

- *Level 1 : quoted prices (unadjusted) in active markets for identical assets or liabilities which are accessible at the measurement date.*
- *Level 2 : inputs other than quoted prices included in level 1 that are observable for the assets and liabilities, either directly or indirectly.*
- *Level 3 : inputs that are not observable for the assets and liabilities.*

For assets and liabilities that are recognized in the financial statements on recurring basis, the Bank determines whether there is a transfer between levels in the hierarchy by evaluating categories (based on the lowest level input that is significant to the fair value measurement) at the end of each reporting period.

The Bank, for purposes of disclosing the fair value, has determined the classes of assets and liabilities based on the nature, characteristics, risk of assets and liabilities, and the fair value hierarchy levels (Note 46).

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

d. Aset keuangan dan liabilitas keuangan (lanjutan)

(x) Pengukuran biaya perolehan diamortisasi

Biaya perolehan diamortisasi dari aset keuangan atau liabilitas keuangan adalah jumlah aset keuangan atau liabilitas keuangan yang diukur pada saat pengakuan awal dikurangi pembayaran pokok pinjaman, ditambah atau dikurangi amortisasi kumulatif menggunakan metode suku bunga efektif yang dihitung dari selisih antara nilai pengakuan awal dan nilai jatuh temponya, dan dikurangi penurunan nilai.

(xi) Aset keuangan sukuk

Berdasarkan PSAK No.410 (Revisi 2015), Bank menentukan investasi pada sukuk *ijarah* dan *mudharabah* sebagai diukur pada biaya perolehan, diukur pada nilai wajar melalui penghasilan komprehensif lain atau diukur pada nilai wajar melalui laba rugi.

Klasifikasi sukuk adalah sebagai berikut:

a. Diukur pada biaya perolehan
- Investasi tersebut dimiliki dalam suatu model usaha yang bertujuan utama untuk memperoleh arus kas kontraktual dan terdapat persyaratan kontraktual dalam menentukan tanggal tertentu atas pembayaran pokok dan atau hasilnya.
- Biaya perolehan sukuk termasuk biaya transaksi, dan selisih antara biaya perolehan dan nilai nominal diamortisasi secara garis lurus selama jangka waktu sukuk dan diakui dalam laba rugi.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

d. Financial assets and liabilities (continued)

(x) Amortized cost measurement

The amortized cost of a financial asset or liability is the amount at which the financial asset or liability is measured at initial recognition, minus principal repayments, plus or minus the cumulative amortization using the effective interest method of any difference between the initial amount recognized and the maturity amount, minus any reduction for impairment.

(xi) Sukuk Financial Asset

In accordance with SFAS No.410 (Revised 2015), the Bank determines the classification of investments in sukuk ijarah and mudharabah either measured at cost, fair value through other comprehensive income or fair value through profit or loss.

Sukuk classifications are as follows:

a. Measured at cost
- *The investment is held in a business model whereby the primary goal is to obtain contractual cash flows and has contractual terms in determining the specific date of principal payments and or the results.*
- *Sukuk acquisition cost includes transaction cost, and difference between the acquisition cost and the nominal value is amortized on a straight-line basis over the period of the sukuk and recognized to profit or loss.*

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

d. Aset keuangan dan liabilitas keuangan (lanjutan)

(xi) Aset keuangan sukuk (lanjutan)

Klasifikasi sukuk adalah sebagai berikut: (lanjutan)

b. Diukur pada nilai wajar melalui penghasilan komprehensif lain

- Investasi tersebut dimiliki dalam suatu model usaha yang bertujuan utama untuk memperoleh arus kas kontraktual dan melakukan penjualan sukuk, terdapat persyaratan kontraktual dalam menentukan tanggal tertentu atas pembayaran pokok dan atau hasilnya.
- Biaya perolehan sukuk termasuk biaya transaksi, dan selisih antara biaya perolehan dan nilai nominal diamortisasi secara garis lurus selama jangka waktu sukuk dan diakui dalam laba rugi.
- Keuntungan atau kerugian dari perubahan nilai wajar diakui dalam penghasilan komprehensif lain setelah memperhitungkan saldo selisih biaya perolehan dan nilai nominal yang belum diamortisasi dan saldo akumulasi keuntungan atau kerugian nilai wajar yang telah diakui dalam penghasilan komprehensif lain sebelumnya. Ketika investasi sukuk dihentikan pengakuannya, akumulasi keuntungan atau kerugian yang sebelumnya diakui dalam penghasilan komprehensif lain direklasifikasi ke laba rugi.

c. Diukur pada nilai wajar melalui laba rugi

Biaya perolehan sukuk tidak termasuk biaya transaksi, dan selisih antara nilai wajar dan jumlah tercatat diakui dalam laba rugi.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

d. Financial assets and liabilities (continued)

(xi) Sukuk Financial Asset (continued)

Sukuk classifications are as follows: (continued)

b. Measured at fair value through other comprehensive income

- *The investment is held in a business model whereby the primary goal is to obtain contractual cash flows and sell sukuk, has contractual terms in determining the specific date of principal payments and or the results.*
- *Sukuk acquisition cost includes transaction cost, and difference between the acquisition cost and the nominal value is amortized on a straight-line basis over the period of the sukuk and recognized to profit or loss.*
- *Gain or loss from changes of fair value is recognized in other comprehensive income after considering unamortized difference of acquisition cost and nominal value and accumulated gain or loss of fair value which has previously recognized in other comprehensive income. When sukuk is derecognized, accumulated gain or loss which has previously recognized in other comprehensive income is reclassified to profit or loss.*

c. Measured at fair value through profit or loss

Sukuk acquisition cost excludes transaction cost and the difference between fair value and the carrying value is recognized in profit or loss.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

e. Cadangan kerugian penurunan nilai atas aset keuangan

Pada setiap tanggal pelaporan, Bank menghitung kerugian kredit ekspektasian berdasarkan estimasi 12 bulan. Jika terjadi kenaikan risiko kredit yang signifikan sejak pengakuan awal maka estimasi kerugian kredit ekspektasian akan dihitung sepanjang umur kontrak.

Kerugian kredit ekspektasian merupakan estimasi probabilitas tertimbang dari kerugian kredit (yaitu nilai kini dari seluruh kekurangan kas) selama perkiraan umur instrumen keuangan. Kekurangan kas adalah selisih antara arus kas yang terutang kepada Bank sesuai dengan kontrak dan arus kas yang diperkirakan akan diterima oleh Bank.

Bank menetapkan definisi peningkatan risiko kredit instrumen keuangan secara signifikan sejak pengakuan awal sebagai berikut:

- Sesuai dengan praduga (*rebuttable presumption*) PSAK 109, yaitu ketika pembayaran kontraktual tertunggak lebih dari 30 hari; atau
- Ketika terjadi restrukturisasi aset keuangan yang disebabkan oleh peningkatan risiko kredit.

Bank menerapkan definisi gagal bayar (*stage* 3) yang konsisten dengan definisi yang digunakan untuk tujuan manajemen risiko kredit internal untuk instrumen keuangan yang relevan, yaitu:

- Ketika instrumen keuangan telah menunggak 90 hari; atau
- Telah berada pada kolektibilitas BI 3, 4, atau 5.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

e. Allowance for impairment losses on financial assets

At reporting date, the Bank calculates expected credit loss based on estimated 12 months. If there is a significant increase in credit risk since initial recognition, the estimated expected credit loss will be calculated throughout the life of the contract.

Expected credit losses are estimated weighted probabilities of credit losses (is the present value of all cash shortages) over the estimated life of the financial instrument. Cash shortages are the difference between the cash flows owed to the Bank in accordance with the contract and the cash flows that are expected to be received by the Bank.

The Bank has determined the definition of a significant increase in credit risk of financial instruments since initial recognition as follows:

- *In accordance with presumption (rebuttable presumption) SFAS 109, i.e. when contractual payments are overdue for more than 30 days; or*
- *When there is a restructuring of financial assets caused by increased credit risk.*

The Bank applies a definition of default (stage 3) that is consistent with the definition used for internal credit risk management for relevant financial instruments, namely:

- *When financial instruments are in 90 days in arrears; or*
- *Is in BI collectibility 3, 4, or 5.*

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

e. Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

Bank mengelompokkan aset keuangan dibeli dari aset keuangan memburuk apabila:
- Hilangnya pasar aktif dari aset keuangan; dan
- Pembelian dengan diskon sangat besar.

Bank mengelompokkan aset keuangan berasal dari aset keuangan memburuk apabila:
- Pihak peminjam dinyatakan pailit;
- Terdapat perubahan dari bentuk penyediaan dana, atau
- Debitur telah berada pada *stage* 3 dan memenuhi salah satu kondisi berikut:
  - Telah dilakukan restrukturisasi secara berulang-ulang dan terjadi pelanggaran kontrak secara signifikan; atau
  - Atas restrukturisasi yang terjadi, terdapat selisih negatif lebih dari 20% atas nilai kini arus kas masa depan (yang didiskontokan menggunakan suku bunga efektif awal) antara persyaratan awal dan persyaratan restrukturisasi.

Bank melakukan penurunan nilai secara individu atau kolektif dengan mempertimbangkan semua informasi yang wajar dan terdukung, termasuk informasi yang bersifat perkiraan masa depan (*forward-looking*).

Perhitungan cadangan kerugian penurunan nilai atas aset keuangan yang dinilai secara kolektif, berdasarkan pada karakteristik risiko kredit yang sama dengan mempertimbangkan segmentasi kredit berdasarkan permodelan kerugian masa depan.

Bank menggunakan metode statistik, *credit rating* dan perkiraan makroekonomi untuk menilai cadangan kerugian penurunan nilai atas kredit yang diberikan.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

e. Allowance for impairment losses on financial assets (continued)

The Bank classifies purchased or originated credit-impaired financial asset if:
- *Loss of an active market from financial assets; and*
- *Purchases with very large discounts.*

The Bank classifies financial assets derived from deteriorat financial assets if:
- *The borrower is declared bankrupt;*
- *There is a change in the form of provision of funds, or*
- *The debtor is at stage 3 and meets one of the following conditions:*
  - *Repeated restructuring and significant breach of contract; or*
  - *For the restructuring that occurs, there is a negative difference of more than 20% of the present value of future cash flows (discounted using the initial effective interest rate) between the initial terms and the terms of the restructuring.*

The Bank is impaired individually or collectively by considering all reasonable and supported information, including forward looking information.

Calculation of allowance for impairment losses on financial assets assessed collectively is grouped based on similar credit risk characteristics and taking into account the loan segmentation based on future loss model

The Bank uses statistical method, credit rating and macroeconomy forecast to assess allowance for impairment losses on loans.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

e. Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

e.1. Kredit yang diberikan dan pembiayaan/piutang *murabahah*

Bank dapat menetapkan debitur untuk dievaluasi secara individual apabila memenuhi minimal salah satu kriteria sebagai berikut:

Kredit Konsumer:

1. Akun yang memenuhi kriteria sebagai berikut:
   a. Akun yang *default* (*bucket* 5) atau restrukturisasi; dan
   b. Memiliki pokok di atas atau sama dengan Rp4 miliar
2. Mengalami bencana alam yang ditentukan oleh Otoritas Jasa Keuangan ataupun instansi pemerintah dan disetujui Direksi.
3. Kualitas kredit kolektibilitas 5 di atas 5 (lima) tahun (minimal DPD 2006 hari) dengan kriteria tidak ada sertifikat atau belum dilakukan pengikatan sempurna (HT) kecuali kredit program (SKMHT)
4. Hasil lelang dibawah kewajiban pokok
5. Terkait pemasalahan hukum dengan indikasi, antara lain:
   a. Sengketa agunan; atau
   b. Sengketa lahan.
   Dimana salah satu dari 2 (dua) sengketa tersebut sudah terbit ketetapan hukum mengikat dan menimbulkan kerugian bagi Bank.
6. Debitur minimal masuk *bucket* 4 dan terdapat minimal 2 (dua) permasalahan sebagai berikut:
   a. Tempat bekerja debitur atau usaha debitur mengalami kebangkrutan
   b. Debitur terkena PHK
   c. Sertifikat belum terbit selama minimal 36 bulan sejak akad kredit
   d. Rumah yang menjadi agunan tidak selesai atau terbengkalai
   e. Pembayaran angsuran dilakukan oleh pihak ketiga yang tidak terafiliasi oleh debitur
   f. Debitur sudah mengalami restrukturisasi minimal 2 (dua) kali.
   g. Debitur mengalami permasalahan hukum
   h. Klaim asuransi terkait kredit ditolak/ tidak dibayar oleh asuradur.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

e. Allowance for impairment losses on financial assets (continued)

e.1. Loans and murabahah financing receivables

Bank may assign debtors to be evaluated individually if they meet at least one of the following criteria:

Consumer Credit:

1. *Accounts that meet the following criteria:*
   a. *Account that defaults (bucket 5) or restructured; and*
   b. *Has a principal of more than or equal to Rp4 billion*
2. *Experienced a natural disaster as determined by the Financial Services Authority or government agency and approved by the Board of Directors.*
3. *Credit quality collectibility of 5 over 5 (five) years (minimum DPD 2006 days) with the criteria of no certificate or perfect binding (HT) except for program credit (SKMHT)*
4. *The auction proceeds under the principal obligation*
5. *In relation to legal issues with indications, among others:*
   a. *Collateral dispute ; or*
   b. *Land dispute.*
   Where one of the 2 (two) disputes a binding legal provision has been issued and causes losses to the Bank.
6. *Debtors are at least in bucket 4 and there are at least 2 (two) problems as follows:*
   a. *The debtor's place of work or the debtor's business is bankrupt*
   b. *The debtor is laid off*
   c. *The certificate has not been issued for at least 36 months since the credit agreement*
   d. *The house that became the collateral was not finished or was abandoned*
   e. *Installment payments are made by a third party that is not affiliated with the debtor*
   f. *The debtor has undergone restructuring at least 2 (two) times.*
   g. *The debtor is experiencing legal problems*
   h. *Insurance claims related to credit rejected/not paid by the insurer.*

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

e. Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

e.1. Kredit yang diberikan dan pembiayaan/piutang *murabahah (lanjutan)*

Kredit Komersial:

1. Akun yang memenuhi kriteria sebagai berikut:
   a. Akun yang *default* (*bucket* 5) atau restrukturisasi; dan
   b. Memiliki pokok di atas atau sama dengan Rp30 miliar
2. Mengalami bencana alam yang ditentukan oleh Otoritas Jasa Keuangan ataupun instansi pemerintah dan disetujui Direksi.
3. Kualitas kredit kolektibilitas 5 di atas 5 (lima) tahun (minimal DPD 2006 hari) dengan kriteria tidak ada sertifikat atau belum dilakukan pengikatan sempurna (HT) kecuali kredit program (SKMHT)
4. Hasil lelang dibawah kewajiban pokok
5. Terkait pemasalahan hukum dengan indikasi, antara lain:
   a. Sengketa pengurus,
   b. Sengketa agunan,
   c. Sengketa lahan,
   d. Sengketa proyek,

   Dimana salah satu dari 4 (empat) sengketa tersebut sudah terbit ketetapan hukum mengikat dan menimbulkan kerugian bagi bank.
6. Dalam hal penetapan kolektibilitas menggunakan konsep 3 (tiga) pilar maka kriteria *individual assessment* dapat ditetapkan dengan kriteria: minimal masuk *bucket* 4 (hari tunggakan 61 hari) dan terdapat minimal 2 (dua) dari 3 (tiga) permasalahan sebagai berikut:
   a. Permasalahan prospek usaha menurun dengan indikasi antara lain:
      i. Tidak terdapat pembayaran pokok sesuai dengan ketentuan dan atau kesepakatan yang telah dibuat, atau
      ii. Pembangunan berhenti lebih dari 1 (satu) tahun, dan/atau
      iii. Tidak terdapat penjualan lebih dari 1 (satu) tahun.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

e. Allowance for impairment losses on financial assets (continued)

e.1. Loans and murabahah financing receivables (continued)

Commercial Credit:

1. *Accounts that meet the following criteria:*
   a. *Account that defaults (bucket 5) or restructured; and*
   b. *Has a principal of more than or equal to Rp30 billion*
2. *Experienced a natural disaster as determined by the Financial Services Authority or government agency and approved by the Board of Directors.*
3. *Credit quality collectibility of 5 over 5 (five) years (minimum DPD 2006 days) with the criteria of no certificate or perfect binding (HT) except for program credit (SKMHT)*
4. *The auction proceeds under the principal obligation*
5. *In relation to legal issues with indications, among others:*
   a. *Collateral dispute ; or*
   b. *Collateral dispute,*
   c. *Land dispute,*
   d. *Project dispute*

   Where one of the 4 (four) disputes has issued a binding legal provision and/or causes losses to the bank.
6. *In the case of collectability using the 3 (three) pillar concept, the individual assessment criteria can be determined with the following criteria: at least entering bucket 4 (days arrears 61 days) and there are at least 2 (two) out of 3 (three) problems as follows:*
   a. *Problems with decreased business prospects with indications include:*
      i. *There is no principal payment in accordance with the provisions and/or agreements that have been made, or*
      ii. *Construction has stopped for more than 1 (one) year, and/ or*
      iii. *There are no sales for more than 1 (one) year*

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

e. Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

e.1. Kredit yang diberikan dan pembiayaan/piutang *murabahah (lanjutan)*

Kredit Komersial: (lanjutan)

b. Permasalahan agunan dengan memenuhi salah satu indikasi/ kriteria sebagai berikut:
   i. Sertifikat agunan belum atas nama debitur atau pengurus yang tidak dapat diikat Hak Tanggungan;
   ii. Sertifikat agunan belum dilakukan pengikatan Hak Tanggungan 12 bulan sejak akad kredit dan status *default*;
   iii. Sertifikat tidak memiliki alas hukum untuk dilakukan pengalihan kepada pembeli;
   iv. Agunan belum terbit sertifikat;
   v. Agunan tidak terbangun 100% khusus kredit investasi;
c. Permasalahan kemampuan membayar mengalami penurunan

Perhitungan komponen PD, LGD, dan EAD yang dilakukan secara kolektif pada setiap segmentasi kredit mempertimbangkan data historis, saat ini dan masa yang akan datang.

Perhitungan cadangan kerugian penurunan nilai atas aset keuangan yang dinilai secara kolektif berdasarkan karakteristik risiko kredit yang sama dengan mempertimbangkan segmentasi kredit berdasarkan pengalaman kerugian masa lalu dan kemungkinan terjadinya kegagalan (*probability of default*). Aset keuangan dikelompokan berdasarkan karakteristik risiko kredit yang sama antara lain dengan mempertimbangkan segmentasi kredit dan tunggakan debitur.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

e. Allowance for impairment losses on financial assets (continued)

e.1. Loans and murabahah financing receivables (continued)

Commercial Credit: (continued)

b. Collateral problems by meeting one of the following indications/criteria:
   i. The collateral certificate is not yet in the name of the debtor or management that cannot be bound by the Mortgage;
   ii. Collateral certificate has not been bound by the Mortgage Rights 12 months since the credit agreement and default status;
   iii. The certificate has no legal basis for transfer to the buyer;
   iv. The collateral has not been issued a certificate;
   v. Collateral is not built 100% specifically for investment credit;
c. The problem of ability to pay has decreased

The computation of PD, LGD, and EAD components carried out collectively in each credit segmentation takes into account historical, current and future data.

Calculation of allowance for impairment losses on financial assets assessed collectively grouped based on similar credit risk characteristics and taking into account the loan segmentation based on historical loss experience and the possibility of failure (probability of default). Financial assets are grouped on the basis of similar credit risk characteristics by considering the credit segmentation and past due status of the debtors, among others.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

e. Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

e.1. Kredit yang diberikan dan pembiayaan/piutang *murabahah (lanjutan)*

Bank perlu mempertimbangkan informasi masa lalu, masa sekarang dan masa depan dalam menghitung kemungkinan kejadian gagal bayar. Oleh karena itu, perhitungan PD dilakukan dengan tahapan sebagai berikut:
a. Perhitungan PD secara historis (PD TTC)
b. Perhitungan PD *forward-looking*; dan
c. Perhitungan PD *Point in time* (PiT) melalui proses *scaling*

LGD merupakan estimasi kerugian atas debitur dengan menghitung *recovery* yang didapatkan setelah debitur tersebut *default*. LGD diperhitungkan sebesar 100% dikurangi tingkat pengembalian (*recovery rate*), perhitungan LGD dilakukan dengan tahapan sebagai berikut:
a. Perhitungan LGD secara historis (LGD TTC);
b. Perhitungan LGD *Point in Time* (LGD PiT) dengan mempertimbangkan informasi *forward looking*.

Dalam membuat estimasi *recoverable amount* (estimasi jumlah yang dapat diperoleh kembali), Bank dapat menggunakan metode berikut ini:
a. *Discounted Cash Flow*
Bank melakukan perhitungan berdasarkan jumlah yang telah didiskonto (*discounted value*) dari estimasi arus kas masa datang (pokok dan bunga) yang didiskonto berdasarkan Suku Bunga Efektif dari setiap kredit.
b. *Expected Collateral*
Bank melakukan perhitungan berdasarkan estimasi penjualan agunan yang dilakukan dengan mempertimbangkan nilai wajar dan jangka waktu estimasi penjualan agunan di masa depan. Hasil perhitungan akan didiskontokan berdasarkan Suku Bunga Efektif dari setiap kredit.
c. Metode lainnya yang berdasarkan analisis Bank lebih sesuai dan tidak bertentangan dengan ketentuan Regulator.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

e. Allowance for impairment losses on financial assets (continued)

e.1. Loans and murabahah financing receivables (continued)

Bank needs to consider past, present and future information in calculating the probability of default. Therefore, the calculation of PD is carried out in the following stages:

a. Historical PD calculation (PD TTC)
b. forward-looking PD calculation; and
c. Calculation of PD Point in time (PiT) through a scaling process

LGD is an estimated loss for a debtor by calculating the recovery obtained after the debtor defaults. LGD is calculated as 100% minus the rate of return (recovery rate), LGD calculation is carried out in the following stages:

a. Historical LGD calculation (LGD TTC);

b. Calculation of LGD Point in Time (LGD PiT) by considering forward looking information.

The Bank uses the fair value of collateral as the basis for future cash flow if one of the following conditions is met:

a. Discounted Cash Flow
The Bank performs calculations based on the discounted amount (discounted value) of future cash flows (principal and interest) discounted based on the Effective Interest Rate of each loan.

b. Expected Collateral
The Bank calculates earthquakes which are calculated based on the analysis carried out by considering the fair value and the estimated future sales period. The calculation results will be discounted based on the Effective Interest Rate of each loan.
c. Other methods based on the Bank's analysis are more appropriate and do not conflict with the Regulators' provisions.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

e. Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

e.1. Kredit yang diberikan dan pembiayaan/piutang *murabahah (lanjutan)*

Sesuai dengan PSAK No. 402, "Akuntansi *Murabahah*" dan Pedoman Akuntansi Perbankan Syariah Indonesia (PAPSI) Revisi 2013), Bank menghitung CKPN untuk piutang murabahah sesuai dengan ketentuan di ISAK No. 402, "Penurunan Nilai Piutang *Murabahah*".

e.2. Pembiayaan/piutang syariah selain *murabahah*

Untuk aset keuangan berupa piutang *istishna*, pinjaman *qardh*, pembiayaan *mudharabah*, dan pembiayaan *musyarakah*, Bank menerapkan Peraturan Otoritas Jasa Keuangan (POJK) No.02/POJK.03/2022 tanggal 31 Januari 2022 tentang "Penilaian Kualitas Aset Bank Umum Syariah dan Unit Usaha Syariah".

Cadangan kerugian minimum yang harus dibentuk sesuai dengan Peraturan Bank Indonesia adalah sebagai berikut:

a. 1% dari aset produktif yang digolongkan Lancar, di luar penempatan pada Bank Indonesia, obligasi pemerintah, instrumen hutang lain yang diterbitkan oleh Pemerintah Republik Indonesia dan aktiva produktif yang dijamin dengan agunan tunai;
b. 5% dari aset produktif yang digolongkan Dalam Perhatian Khusus setelah dikurangi agunan;
c. 15% dari aset produktif yang digolongkan Kurang Lancar setelah dikurangi agunan;
d. 50% dari aset produktif yang digolongkan Diragukan setelah dikurangi agunan; dan
e. 100% dari aset produktif yang digolongkan Macet setelah dikurangi agunan.

Kriteria penilaian nilai agunan yang dapat dikurangkan dalam pembentukan cadangan kerugian penurunan nilai sesuai dengan Peraturan Bank Indonesia (OJK).

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

e. Allowance for impairment losses on financial assets (continued)

e.1. Loans and murabahah financing receivables (continued)

In accordance with SFAS No. 402, "Accounting for Murabahah" and Indonesia Sharia Banking Accounting Guidelines (PAPSI Revised 2013), the Bank calculates individual allowance for impairment losses for murabahah receivable in accordance with IFAS No. 402 "Impairment of Murabahah Receivables".

e.2. Sharia financing/receivables other than murabahah

For financial assets of istishna receivables, funds of qardh, mudharabah financing, and musyarakah financing, the Bank implements POJK No.02/POJK.03/2022 dated January 31, 2022 regarding "Asset Quality Ratings for Sharia Bank and Sharia Business Unit".

The minimum allowance to be provided in accordance with Bank Indonesia Regulation is as follows:

a. 1% of earning assets classified as Current, excluding placements with Bank Indonesia, government bonds, other debt instruments issued by the Government of the Republic of Indonesia and earning assets secured by cash collateral;
b. 5% of earning assets classified as Special Mention, net of deductible collateral;
c. 15% of earning assets classified as Sub-standard, net of deductible collateral;
d. 50% of earning assets classified as Doubtful, net of deductible collateral; and
e. 100% of earning assets classified as Loss, net of deductible collateral.

The criterias for assessment of the value of collateral that can be deducted in the calculation of allowance for impairment losses are based on Bank Indonesia Regulations (OJK).

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

f. Giro pada Bank Indonesia dan bank lain

Giro pada Bank Indonesia dan bank lain dinyatakan sebesar biaya perolehan diamortisasi menggunakan metode suku bunga efektif dikurangi cadangan kerugian penurunan nilai. Giro pada Bank Indonesia dan Bank lain diklasifikasikan sebagai biaya perolehan diamortisasi.

g. Penempatan pada Bank Indonesia dan bank lain

Penempatan pada Bank Indonesia dan bank lain merupakan penanaman dana pada Bank Indonesia berupa *deposit facility, term deposit* dan *deposit facility* syariah, sedangkan penempatan pada bank lain berupa deposito berjangka, *interbank call money* dan tabungan.

Penempatan pada Bank Indonesia dan bank lain dinyatakan sebesar biaya perolehan diamortisasi menggunakan metode suku bunga efektif dikurangi cadangan kerugian penurunan nilai. Penempatan pada Bank Indonesia dan bank lain diklasifikasikan sebagai biaya perolehan diamortisasi.

h. Efek-efek dan obligasi pemerintah

Efek-efek terdiri dari surat berharga yang diperdagangkan dalam pasar modal dan pasar uang, antara lain Sertifikat Bank Indonesia (SBI), Sertifikat Deposito Bank Indonesia (SDBI), obligasi, *Negotiable Certificate of Deposit* (NCD), *Medium Term Notes* (MTN), penyertaan reksadana dan Efek Beragun Aset (EBA).

EBA adalah portofolio efek yang terdiri dari aset keuangan berupa kumpulan tagihan kredit kepemilikan rumah. EBA terbentuk ketika bank menjual pinjaman atau utang lainnya kepada penerbit (lembaga keuangan) lalu disusun dalam suatu portofolio untuk dijual kembali kepada investor.

Obligasi Pemerintah adalah obligasi yang diterbitkan oleh Pemerintah Indonesia.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

f. Current accounts with Bank Indonesia and other banks

Current accounts with Bank Indonesia and other banks are stated at amortized cost using the effective interest method less allowance for impairment losses. Current accounts with Bank Indonesia and other banks are classified as amortized cost.

g. Placements with Bank Indonesia and other banks

Placements with Bank Indonesia and other banks represent placements of funds in Bank Indonesia in the form of deposit facility, term deposit and sharia deposit facility, whereas placement with other banks is in the form of time deposit, interbank call money and savings.

Placements with Bank Indonesia and other banks are stated at amortized cost using the effective interest method less allowance for impairment losses. Placements with Bank Indonesia and other banks are classified as amortized cost.

h. Securities and government bonds

Securities consist of securities traded in the capital market and money market, such as Bank Indonesia Certificates (SBI), Deposits Certificates of Bank Indonesia (SDBI), bonds, Negotiable Certificate of Deposit (NCD), Medium Term Notes (MTN) mutual funds and Asset Backed Securities (ABSs).

ABSs are securities portfolio consisting of financial assets in the form of mortgages loan. ABSs are created when bank sells its loans or other debts to an issuer (financial institution) and then arranged in a portfolio in order to resale to investors.

Government bonds are bonds issued by the Indonesian Government.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

h. Efek-efek dan obligasi pemerintah (lanjutan)

Pengukuran efek-efek dan obligasi Pemerintah didasarkan atas klasifikasinya sebagai berikut:

1. Efek-efek dan obligasi pemerintah yang diklasifikasikan sebagai biaya perolehan yang diamortisasi diukur dengan biaya perolehan yang diamortisasi menggunakan metode suku bunga efektif. Pendapatan bunga diakui dalam laporan laba rugi dan penghasilan komprehensif lain menggunakan metode suku bunga efektif.
2. Efek-efek dan obligasi pemerintah yang diklasifikasikan sebagai nilai wajar melalui laba rugi (FVTPL) diukur dengan menggunakan nilai wajar. Keuntungan atau kerugian yang belum direalisasi akibat kenaikan atau penurunan nilai wajarnya disajikan dalam laporan laba rugi dan penghasilan komprehensif lain. Perubahan nilai wajar diakui pada laporan laba rugi. Atas penjualan portofolio efek-efek dan obligasi pemerintah untuk nilai wajar melalui laba rugi, perbedaan antara harga jual dengan nilai pasar wajar diakui sebagai keuntungan atau kerugian penjualan pada tahun dimana efek-efek dan obligasi pemerintah tersebut dijual.
3. Efek-efek dan obligasi pemerintah yang diklasifikasikan sebagai nilai wajar melalui penghasilan komprehensif lain (FVTOCI) diukur dengan menggunakan nilai wajar. Pendapatan bunga diakui dalam laporan laba rugi dan penghasilan komprehensif lain menggunakan metode suku bunga efektif. Perubahan nilai wajar lainnya diakui langsung dalam ekuitas sampai efek-efek dan obligasi pemerintah dijual atau mengalami penurunan nilai, dimana akumulasi keuntungan dan kerugian yang sebelumnya diakui dalam ekuitas diakui dalam laporan laba rugi penghasilan komprehensif lain.

i. Kredit yang diberikan

Kredit yang diberikan merupakan penyediaan uang atau tagihan yang dapat disamakan dengan itu, berdasarkan kesepakatan dengan pihak penerima kredit dan mewajibkan pihak penerima kredit untuk melunasi setelah jangka waktu tertentu dengan imbalan bunga.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

h. Securities and government bonds (continued)

The measurement of securities and Government bonds are based on the classification of the securities as follows:

1. *Securities and government bonds classified as amortized cost are measured at amortized cost using the effective interest method. Interest income is recognized in the statement of profit or loss and other comprehensive income using the effective interest method.*
2. *Securities and government bonds classified as fair value through profit or loss (FVTPL) are measured using fair value. Unrealized gains or losses resulting from changes in fair values are recognized in the statement of profit or loss and other comprehensive income. Changes in fair value are recognized in profit or loss. Upon sale of portfolio of fair value through profit or loss securities and government bonds, the difference between the selling price and the fair value is recognized as a gain or loss in the year when the securities and government bonds are sold.*
3. *Securities and government bonds classified as fair value through other comprehensive income (FVTOCI) are measured using fair value. Interest income is recognized in the statement of profit or loss and other comprehensive income using the effective interest method. Other fair value changes are recognized directly in equity until the securities and Government bonds are sold or impaired, whereby the cumulative gains and losses previously recognized in the equity are recognized in the statement of profit or loss and other comprehensive income.*

i. Loans

Loans represent the lending of money or equivalent receivables under contracts with borrowers, where the borrowers are required to repay their debts with interest after a specified period of time.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

i. Kredit yang diberikan (lanjutan)

Kredit yang diberikan (termasuk kredit yang diberikan dalam pinjaman sindikasi) pada awalnya diukur pada nilai wajar ditambah dengan biaya transaksi yang dapat diatribusikan secara langsung dan biaya tambahan untuk memperoleh aset keuangan tersebut. Setelah pengakuan awal kredit yang diberikan diukur pada biaya perolehan amortisasi menggunakan metode suku bunga efektif dikurangi dengan cadangan kerugian penurunan nilai.

Kredit yang diberikan diklasifikasikan sebagai diukur pada biaya perolehan diamortisasi.

Kredit yang diberikan dalam pinjaman sindikasi ataupun penerusan kredit dinyatakan sebesar pokok kredit sesuai dengan porsi risiko yang ditanggung oleh Bank.

Restrukturisasi kredit

Restrukturisasi kredit meliputi adanya perpanjangan jangka waktu pembayaran dan ketentuan kredit yang baru.

Kredit yang direstrukturisasi disajikan sebesar nilai yang lebih rendah antara nilai tercatat kredit pada tanggal restrukturisasi atau nilai tunai penerimaan kas masa depan setelah restrukturisasi. Kerugian akibat selisih antara nilai tercatat kredit pada tanggal restrukturisasi dengan nilai tunai penerimaan kas masa depan setelah restrukturisasi diakui dalam laporan laba rugi dan penghasilan komprehensif lain. Setelah restrukturisasi, semua penerimaan kas masa depan yang ditetapkan dalam persyaratan baru dicatat sebagai pengembalian pokok kredit yang diberikan dan pendapatan bunga sesuai dengan syarat-syarat restrukturisasi.

Penjualan Kredit Pemilikan Rumah (KPR)

Bank telah melakukan penjualan atas KPR kepada pihak ketiga.

Atas penjualan tersebut, Bank telah memindahkan risiko dan manfaat atas kepemilikan KPR kepada pihak lawan. Oleh karena itu, pada tanggal efektif penjualan, Bank menghentikan pengakuan atas KPR tersebut.

Penjualan tersebut telah memenuhi kriteria jual putus seperti yang tertuang dalam Peraturan OJK No.11/POJK.03/2019.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

i. Loans (continued)

Loans (including loans under syndication) are initially measured at fair value plus transaction costs that are directly attributable to obtaining the financial asset. After initial recognition, loans are measured at amortized cost using the effective interest method, net of allowance for impairment losses.

Loans are classified as amortized costs.

Loans under syndication or channelling are stated at the principal amount equal to the risk portion assumed by the Bank.

Loan restructuring

Loan restructuring may involve extending the payment arrangements and new loan conditions.

Restructured loans are stated at the lower of carrying value on the date of restructuring or value of the future cash receipts after the restructuring. Losses resulting from the difference between the carrying value on the date of restructuring the present value of future cash receipts after the restructuring is recognized in the statement of profit or loss and other comprehensive income. After the restructuring, all future cash receipts specified by the new terms are recorded as a return of principal loans and interest income in accordance with the terms of the restructuring.

Sales of Housing Loans (KPR)

The Bank sold its KPR to third parties.

In relation with the above mention sale, the Bank has transferred the risk and rewards of ownership of the KPR to counterparty. Hence, at the effective date of the sale, the Bank derecognized the KPR.

The sale has fulfill the criteria of true sale according to OJK regulation No. 11/POJK.03/2019.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

j. Pembiayaan/piutang syariah

Pembiayaan/piutang syariah adalah penyediaan uang atau tagihan yang dapat disamakan dengan itu, yang timbul dari transaksi berdasarkan prinsip jual beli dan bagi hasil antara Bank dengan pihak lain selama jangka waktu tertentu. Piutang tersebut meliputi piutang *murabahah*, piutang *istishna* dan *qardh*, untuk pembiayaan meliputi pembiayaan *mudharabah* dan pembiayaan *musyarakah*.

Murabahah adalah akad jual beli antara nasabah dengan Bank, dimana Bank membiayai kebutuhan konsumsi, investasi dan modal kerja nasabah yang dijual dengan harga pokok ditambah dengan keuntungan yang diketahui dan disepakati bersama. Pembayaran atas pembiayaan ini dilakukan dengan cara mengangsur dalam jangka waktu yang ditentukan.

Piutang *murabahah* pada awalnya diukur pada nilai wajar ditambah dengan biaya transaksi yang dapat diatribusikan secara langsung dan merupakan biaya tambahan untuk memperoleh aset keuangan tersebut dan setelah pengakuan awal diukur pada biaya perolehan diamortisasi menggunakan metode marjin efektif dikurangi dengan cadangan kerugian penurunan nilai.

Mudharabah merupakan pembiayaan kerjasama antara Bank sebagai pemilik dana (*shahibul maal*) dengan nasabah sebagai pelaksana usaha (*mudharib*) selama jangka waktu tertentu. Pembagian hasil keuntungan dari proyek atau usaha tersebut ditentukan sesuai dengan *nisbah (pre-determined ratio)* yang telah disepakati bersama. Pada tanggal laporan posisi keuangan, pembiayaan *mudharabah* dinyatakan sebesar saldo pembiayaan dikurangi dengan saldo cadangan kerugian penurunan nilai yang dibentuk berdasarkan hasil reviu oleh manajemen terhadap kualitas pembiayaan yang ada.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

j. Sharia financing/receivables

Financing/receivables based on sharia principles is receivables from providing funds or other similar form of receivables arising from transactions carried out based on sale or purchase arrangements and profit sharing between Bank and other parties for a certain period of time. Such receivables consist of receivables arising from murabahah transactions, istishna transactions and qardh transactions, for financing consist of mudharabah and musyarakah financing.

Murabahah is a sale and purchase contract between the customer and Bank, whereby Bank finances the consumption, investment and working capital needs of the customer sold with a principle price plus a certain margin that is mutually informed and agreed. Repayment on this financing is made in installments within a specified period.

Murabahah receivables are initially measured at fair value plus direct attributable transaction costs and is an additional cost to obtain the respected financial assets and after the initial recognition are measured at amortized cost using the effective margin method less any allowance for impairment losses value.

Mudharabah financing is a joint financing made between Bank as the owner of the funds (shahibul maal) and the customer as a business executor (mudharib) during a certain period. The profit sharing from the project or the business is determined in accordance with the mutually agreed nisbah (pre-determined ratio). On the statement of financial position date, mudharabah financing is stated at the outstanding financing balance less allowance for impairment losses which is provided based on the management's review of the financing quality.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

j. Pembiayaan/piutang syariah (lanjutan)

Musyarakah adalah akad kerjasama yang terjadi diantara para pemilik modal (mitra musyarakah) untuk menggabungkan modal dan melakukan usaha secara bersama dalam suatu kemitraan dengan *nisbah* pembagian hasil sesuai dengan kesepakatan, sedangkan kerugian ditanggung secara proporsional sesuai dengan kontribusi modal. Pada tanggal laporan posisi keuangan, pembiayaan *musyarakah* dinyatakan sebesar saldo pembiayaan dikurangi dengan saldo cadangan kerugian penurunan nilai yang dibentuk berdasarkan hasil reviu oleh manajemen terhadap kualitas pembiayaan yang ada.

Istishna adalah akad penjualan antara *al-mustashni* (pembeli) dan *al-shani* (produsen yang juga bertindak sebagai penjual). Berdasarkan akad tersebut, pembeli menugasi produsen untuk membuat atau mengadakan *al-mashnu* (barang pesanan) sesuai spesifikasi yang diisyaratkan pembeli dan menjualnya dengan harga yang disepakati. Piutang *istishna* disajikan sebesar tagihan termin kepada pembeli akhir dikurangi cadangan kerugian penurunan nilai.

Qardh adalah penyediaan dana atau tagihan yang dapat dipersamakan dengan itu berdasarkan persetujuan atau kesepakatan antara peminjam dan pihak yang meminjamkan yang mewajibkan peminjam melunasi hutangnya setelah jangka waktu tertentu. Pinjaman *qardh* dinyatakan sebesar saldo pinjaman dikurangi dengan saldo cadangan kerugian penurunan nilai yang dibentuk berdasarkan hasil reviu oleh manajemen terhadap kualitas pinjaman yang ada.

k. Tagihan dan liabilitas akseptasi

Tagihan dan liabilitas akseptasi merupakan transaksi Surat Kredit Berdokumen Dalam Negeri (SKBDN) yang diaksep oleh bank pengaksep *(accepting bank)*.

Tagihan dan liabilitas akseptasi dinyatakan sebesar biaya perolehan diamortisasi. Tagihan akseptasi disajikan setelah dikurangi cadangan kerugian penurunan nilai.

Tagihan dan liabilitas akseptasi diklasifikasikan sebagai diukur pada biaya perolehan amortisasi.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

j. Sharia financing/receivables (continued)

Musyarakah is a partnership contract among fund's owners (musyarakah partners) to contribute funds and conduct a business on a joint basis through partnership with the profit sharing based on a predetermined ratio, while the losses are borne proportionally based on the capital contribution. On the statement of financial position date, musyarakah financing is stated at the outstanding financing balance less allowance for impairment losses which is provided based on the management's review on the financing quality.

Istishna is a sale and purchase contract between al-mustashni (buyer) and al-shani (manufacturer also acting as the seller). Based on the contract, the buyer orders the manufacturer to produce or to supply al-mashnu (goods ordered) according to the specifications required by the buyer and to sell them at agreed price. Istishna receivables are stated at outstanding billings to final buyer less allowance for impairment losses.

Qardh is the provision of funds or equivalent claims based on agreement between the borrower and the lender that requires the borrower to repay the debts after a certain period of time. Qardh are stated at outstanding balance less allowance for impairment losses based on the management's review on the financing quality.

k. Acceptances receivable and payable

Acceptances receivable and payable represent Letters of Credit by Local Document (SKBDN) transactions that have been accepted by the accepting bank.

Acceptances receivable and payable are stated at amortized cost. Acceptances receivable are stated net of allowance for impairment losses.

Acceptances receivable and payable are classified as amortized costs.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

l. Penyertaan Saham

Penyertaan saham merupakan investasi jangka panjang pada perusahaan non-publik serta penyertaan modal sementara pada perusahaan debitur yang timbul akibat konversi kredit yang diberikan atau jenis transaksi tertentu yang berakibat Bank memiliki saham pada perusahaan debitur.

Penyertaan saham dengan persentase kepemilikan 20,00% sampai dengan 50,00% dicatat dengan metode ekuitas. Dalam metode ini, penyertaan dicatat sebesar biaya perolehan disesuaikan dengan bagian Bank atas ekuitas perusahaan asosiasi dan dikurangi dengan penerimaan dividen sejak tanggal perolehan, dikurangi cadangan kerugian penurunan nilai.

Penyertaan modal sementara dihapusbuku dari laporan posisi keuangan apabila telah melampaui jangka waktu 5 (lima) tahun sesuai dengan Peraturan OJK No. 40/POJK.03/2019 tentang "Penilaian Kualitas Aset Bank Umum".

m. Aset tetap

Aset tetap awalnya diakui sebesar biaya perolehan, yang terdiri atas harga perolehan dan biaya-biaya tambahan yang dapat diatribusikan langsung untuk membawa aset ke lokasi dan kondisi yang diinginkan supaya aset tersebut siap digunakan sesuai dengan maksud manajemen.

Setelah pengakuan awal, aset tetap selain tanah dinyatakan pada biaya perolehan dikurangi akumulasi penyusutan dan akumulasi rugi penurunan nilai.

Aset tetap yang diperoleh dalam pertukaran aset non-moneter atau kombinasi aset moneter dan non-moneter diukur pada nilai wajar, kecuali:

(i) Transaksi pertukaran tidak memiliki substansi komersial, atau

(ii) Nilai wajar dari aset yang diterima dan diserahkan tidak dapat diukur secara andal.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

l. Investment in shares

Investments in shares represent long-term investments in non-publicly-listed companies and temporary investments in debtor companies arising from conversion of loans or certain of transactions which resulted The Bank have shares in debtor's company.

Investments in shares represent ownership interests of 20.00% to 50.00% are recorded using the equity method. Under this method, investments are recorded at cost and adjusted for the Bank's proportionate share in the net equity of the investees and reduced by dividends earned starting the acquisition date net of by allowance for impairment losses

Temporary investment is written-off from the statement of financial position if it is held for more than 5 (five) years in accordance with OJK Regulation No. 40/POJK.03/2019 regarding "Asset Quality Rating for Commercial Banks".

m. Premises and equipment

All premises and equipment are initially recognized at cost, which comprises its purchase price and any costs directly attributable in bringing the asset to the location and condition necessary for it to be capable of operating in the manner intended by management.

Subsequent to initial recognition, premises and equipment besides lands are carried at cost less any subsequent accumulated depreciation and impairment losses.

Premises and equipment acquired in exchange for a non-monetary asset or for a combination of monetary and non-monetary assets are measured at fair values, unless:

(i) The exchange transaction lacks commercial substance, or

(ii) The fair value of neither the assets received nor the assets given up can be measured reliably.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

m. Aset tetap (lanjutan)

Penyusutan bangunan dihitung dengan menggunakan metode garis lurus (*straight-line method*) sedangkan peralatan kantor dan kendaraan bermotor dihitung dengan menggunakan metode saldo menurun ganda (*double-declining balance method*) berdasarkan taksiran masa manfaat aset tetap sebagai berikut:

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

m. Premises and equipment (continued)

Depreciation of buildings is computed using the straight-line method while depreciation of office furniture and fixtures, and motor vehicles is computed using the double-declining balance method, based on the estimated useful lives of the assets as follows:

	Tahun/*Years*	
Bangunan	10 - 20	*Buildings*
Peralatan kantor dan kendaraan bermotor	4 - 8	*Office furniture and fixtures and motor vehicles*

Penilaian aset tetap dilakukan atas penurunan dan kemungkinan penurunan nilai wajar aset jika terjadi peristiwa atau perubahan keadaan yang mengindikasikan bahwa nilai tercatat mungkin tidak dapat seluruhnya terealisasi.

The carrying amounts of premises and equipment are reviewed for impairment when events or changes in circumstances indicate that the carrying values may not be fully recoverable.

Pada setiap akhir tahun buku, manajemen melakukan pengkajian ulang atas nilai residu, masa manfaat dan metode penyusutan dan disesuaikan secara prospektif, jika diperlukan.

The residual values, useful lives and methods of depreciation of premises and equipment are reviewed by the management and adjusted prospectively, if appropriate, at the end of each year, if necessary.

Jumlah tercatat aset tetap dihentikan pengakuannya pada saat dilepaskan atau saat tidak ada manfaat ekonomis masa depan yang diharapkan dari penggunaan atau pelepasannya. Laba atau rugi yang timbul dari penghentian pengakuan aset (dihitung sebagai perbedaan antara jumlah neto hasil pelepasan dan jumlah tercatat dari aset) diperhitungkan dalam laporan laba rugi dan penghasilan komprehensif lain pada periode aset tersebut dihentikan pengakuannya.

An item of premises and equipment is derecognized upon disposal or when no future economic benefits are expected from its use or disposal. Any gain or loss arising on derecognition of the asset (calculated as the difference between the net disposal proceeds and the carrying amount of the asset) is included in the statement of profit or loss and other comprehensive income in the period such asset is derecognized.

Tanah awalnya dinyatakan sebesar biaya perolehan dan tidak disusutkan. Setelah pengakuan awal, tanah diukur pada nilai wajar pada tanggal revaluasi dikurangi akumulasi rugi penurunan nilai setelah tanggal revaluasi. Penilaian terhadap tanah dilakukan oleh penilai yang memiliki kualifikasi profesional, dan dilakukan secara berkala untuk memastikan bahwa jumlah tercatat tanah tidak berbeda secara material dengan jumlah yang ditentukan dengan menggunakan nilai wajarnya pada akhir periode pelaporan (Catatan 14).

Land are initially recognized at cost and not depreciated. Subsequent to initial recognition, land is measured at fair value at the revaluation date less any subsequent accumulated impairment losses. Valuation of land are performed by appraisers with professional qualification and is done in regular basis to ensure that the carrying amount does not differ materially from its fair value at the end of reporting period (Note 14).

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

m. Aset tetap (lanjutan)

Kenaikan nilai tercatat yang timbul dari revaluasi dicatat sebagai "Surplus Revaluasi Aset Tetap", dan disajikan dalam penghasilan komprehensif lain. Namun, kenaikan tersebut diakui dalam laba rugi hingga sebesar jumlah penurunan nilai aset yang sama akibat revaluasi yang pernah dilakukan sebelumnya dalam laba rugi. Penurunan nilai tercatat yang timbul dari revaluasi diakui dalam laba rugi.

Beban pemeliharaan dan perbaikan dibebankan pada operasi pada saat terjadinya. Beban pemugaran dan penambahan bahan dalam jumlah besar dikapitalisasi kepada jumlah tercatat aset tetap terkait bila besar kemungkinan bagi kelompok usaha manfaat ekonomi masa depan menjadi lebih besar dari standar kinerja awal yang ditetapkan sebelumnya dan disusutkan sepanjang sisa masa manfaat aset tetap terkait.

Aset tetap dalam penyelesaian dicatat sebesar biaya perolehan, yang mencakup kapitalisasi beban pinjaman dan biaya-biaya lainnya yang terjadi sehubungan dengan pendanaan aset tetap dalam penyelesaian tersebut. Akumulasi biaya perolehan akan direklasifikasi ke akun "Aset Tetap" yang bersangkutan pada saat aset tetap tersebut telah selesai dikerjakan dan siap untuk digunakan. Aset tetap dalam penyelesaian tidak disusutkan karena belum tersedia untuk digunakan.

Biaya pengurusan legal hak atas tanah dalam bentuk Hak Guna Usaha ("HGU"), Hak Guna Bangunan ("HGB") dan Hak Pakai ("HP") ketika tanah diperoleh pertama kali diakui sebagai bagian dari biaya perolehan tanah pada akun "Aset Tetap". Biaya pengurusan perpanjangan atau pembaruan legal hak atas tanah diakui sebagai aset tidak berwujud dan diamortisasi sepanjang umur hak hukum atau umur ekonomi tanah, mana yang lebih pendek.

Jika nilai wajar dari aset yang direvaluasi mengalami perubahan yang signifikan dan fluktuatif, maka perlu direvaluasi secara tahunan, sedangkan jika nilai wajar dari aset yang direvaluasi tidak mengalami perubahan yang signifikan dan fluktuatif, maka perlu dilakukan revaluasi paling kurang 3 (tiga) tahun sekali.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

m. Premises and equipment (continued)

Increase in the carrying amount arising from revaluation is recorded in "Premises and equipment Revaluation Surplus" and presented in other comprehensive income. However, the increase is recognized in profit or loss, up to the amount of impairment of the same assets due to revaluation previously recognized in profit or loss. A decrease in carrying value arising as a result of a revaluation should be recognized in profit or loss.

Repairs and maintenance is charged to the profit or loss as incurred. The cost of major renovation and restoration is capitalized to the carrying amount of the related premises and equipment when it is probable that future economic benefits in excess of the originally assessed standard of performance of the existing asset and is depreciated over the remaining useful life of the related asset.

Construction in-progress are stated at cost, including capitalized borrowing costs and other charges incurred in connection with the financing of the said asset constructions. The accumulated costs will be reclassified to the appropriate "Premises and Equipment" account when the construction is completed and available for intended use. Assets under construction are not depreciated as these are not yet available for use.

The legal cost of land rights in the form of Business Usage Rights ("Hak Guna Usaha" or "HGU"), Building Usage Right ("Hak Guna Bangunan" or "HGB") and Usage Rights ("Hak Pakai" or "HP") when the land was initially acquired are recognized as part of the cost of the land under the "Premises and Equipment". The extension or the legal renewal costs of land rights were recognized as intangible assets and were amortized over the shorter of the rights' legal life and land's economic life.

If the fair value of the revalued asset change significantly, it is necessary to revaluate on an annual basis, whereas if the fair value of the revaluated asset does not change significantly, it is necessary to revaluate at a minimum every 3 (three) years.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

n. Aset Tidak Berwujud

Berdasarkan PSAK 238 definisi aset berwujud adalah aset nonmoneter teridentifikasi tanpa wujud fisik. Dalam hal ini, Piranti lunak komputer secara jelas disebutkan dalam PSAK 238 sebagai jenis aset yang teridentifikasi sebagai aset berwujud.

Aset tak berwujud awalnya diakui sebesar Pengakuan biaya perolehan dalam jumlah tercatat aset takberwujud dihentikan pada aset tersebut berada pada kondisi yang diinginkan agar aset tersebut siap digunakan dengan cara yang di intensikan oleh manajamen. Oleh karena itu, biaya yang dikeluarkan saat aset sudah dapat digunakan sesuai dengan cara yang di intensikan oleh manajemen dan biaya untuk mengembangkan kembali aset tak berwujud tidak termasuk dalam jumlah tercatat aset tak berwujud.

Setelah pengakuan awal, Aset tak berwujud dinyatakan pada biaya perolehan dikurangi akumulasi amortisasi.

Amortisasi aset tak berwujud dihitung dengan menggunakan metode garis lurus (straight-line method) Berdasarkan rata-rata penggunaan piranti lunak pada Bank, untuk umur manfaat aset tak berwujud ditetapkan oleh unit pengelola aset tak berwujud selama 5 Tahun. Jumlah tercatat aset tak berwujud dihentikan pengakuannya pada saat dilepaskan atau saat tidak ada manfaat ekonomis masa depan yang diharapkan dari penggunaan atau pelepasannya. Laba atau rugi yang timbul dari penghentian pengakuan aset (dihitung sebagai perbedaan antara jumlah neto hasil pelepasan dan jumlah tercatat dari aset) diperhitungkan dalam laporan laba rugi pada periode aset tersebut dihentikan pengakuannya.

Aset tak berwujud tidak boleh dikeluarkan dari daftar rincian aset takberwujud mesikipun aset tersebut telah sepenuhnya dilakukan amortisasi, karena jika aset tersebut masih memiliki manfaat ekonomis masa depan yang diharapkan dari penggunaanya, maka biaya perolehan dan akumulasi Amortisasi tetap berada dalam daftar rincian aset takberwujud yang dimiliki oleh entitas.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

n. Intangible Assets

Based on PSAK 238, the definition of tangible assets is identified non-monetary assets without physical form. In this case, computer software is explicitly stated in PSAK 238 as a type of asset identified as tangible assets.

Intangible assets are initially recognized at the cost of acquisition. The recognition of the cost of acquisition of intangible assets is stopped when the asset is in the desired condition to be ready for use in the manner intended by management. Therefore, costs incurred when the asset can be used in accordance with the intended management and costs to redevelop intangible assets are not included in the carrying amount of intangible assets.

After initial recognition, intangible assets are stated at cost less accumulated amortization.

Amortization of intangible assets is calculated using the straight-line method. Based on the average use of software at the Bank, the useful life of intangible assets is determined by the intangible asset management unit for 5 years. The carrying amount of intangible assets is stopped when the asset is released or when there is no expected future economic benefit from use or disposal. Profit or loss arising from the cessation of asset recognition (calculated as the difference between the net proceeds of disposal and the carrying amount of the asset) is recognized in the income statement for the period in which the asset is derecognized.

Intangible assets should not be removed from the list of intangible assets details even if the asset has been fully amortized, because if the asset still has expected future economic benefits from its use, the cost of acquisition and accumulated amortization remain in the list of intangible assets details owned by the entity.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

n. Aset Tidak Berwujud (lanjutan)

Aset dalam penyelesaian dicatat sebesar biaya perolehan, yang mencakup biaya-biaya yang terjadi sehubungan dengan upaya perolehan, pengembangan dan pengadaan aset tak berwujud dalam penyelesaian tersebut. Akumulasi biaya perolehan akan direklasifikasi ke akun "Aset tak berwujud" yang bersangkutan pada saat aset tak berwujud tersebut telah selesai dikerjakan dan siap untuk digunakan.

Aset tak berwujud dalam penyelesaian tidak disusutkan karena belum tersedia untuk digunakan.

o. Aset hak guna dan liabilitas sewa

PSAK No. 116 menerapkan persyaratan baru atau amandemen sehubungan dengan akuntansi sewa. Standar ini memperkenalkan perubahan signifikan untuk akuntansi *lessee* dengan menghapus perbedaan antara sewa operasi dan pembiayaan dan pengakuan aset hak guna dan liabilitas sewa, kecuali untuk sewa jangka pendek dan aset dengan nilai rendah. Berbeda dengan akuntansi *lessee*, persyaratan untuk akuntansi *lessor* sebagian besar tidak berubah. Dalam hal ini, Bank terekspos risiko Bank sebagai *lessee*.

a) Dampak definisi baru dari sewa

Perubahan utama dari definisi sewa berkaitan dengan konsep pengendalian. PSAK No. 116 menentukan apakah kontrak merupakan, atau mengandung sewa atas dasar jika penyewa memiliki hak untuk mengendalikan penggunaan aset selama suatu jangka waktu tertentu untuk dipertukarkan dengan imbalan. Hal tersebut merupakan perbedaan penentuan kontrak merupakan, atau mengandung sewa berdasarkan PSAK No. 30 yaitu dengan konsep risiko dan manfaat.

Bank menerapkan definisi sewa dan panduan terkait yang diterapkan dalam PSAK No. 116 untuk semua kontrak yang dicatat atau diubah pada atau setelah tanggal 1 Januari 2020.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

n. Intangible Assets (continued)

Assets under development are recorded at cost, which includes costs incurred in connection with the acquisition, development, and procurement efforts of intangible assets under development. The accumulation of acquisition costs will be reclassified to the related "Intangible Assets" account when the intangible asset is completed and ready for use.

Intangible assets under development are not amortized because they are not yet available for use.

o. Right-of use assets and lease liabilities

SFAS No. 116 introduces new or amended requirements with respect to lease accounting. It introduces significant changes to lessee accounting by removing the distinction between operating and finance lease and requiring the recognition of a right-of-use asset and a lease liability at commencement for all leases, except for short-term leases and leases of low value assets. In contrast to lessee accounting, the requirements for lessor accounting have remained largely unchanged. In this case, Bank is exposed the risk of the Bank as lessee.

a) Impact of the new definition of a lease

The change in the definition of a lease mainly relates to the concept of control. SFAS No. 116 determines whether a contract is, or contains, a lease if the lessee has the right to control the use of an identified asset for a certain period of time in exchange for consideration. This is in contrast to the focus on 'risks and rewards' in SFAS No. 30.

The Bank applies the definition of a lease and related guidance set out in SFAS No. 116 to all contracts entered into or changed on or after January 1, 2020.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

o. Aset hak guna dan liabilitas sewa (lanjutan)

b) Panduan praktis, pengecualian pengakuan dan pilihan kebijakan pada saat masa transisi, Bank memilih untuk menerapkan panduan praktis yang terdapat pada panduan transisi dalam PSAK No. 116, yang antara lain:
1. Penggunaan tingkat diskonto tunggal untuk portofolio sewa dengan karakteristik yang hampir sama;
2. Tidak menerapkan pengakuan dan pengukuran berdasarkan PSAK 116 untuk kontrak dengan masa sewa kurang dari 12 bulan pada tanggal 1 Januari 2020 dan dicatat sebagai sewa jangka pendek; dan
3. Pengecualian biaya langsung awal dari pengukuran aset hak guna pada tanggal penerapan awal.

Bank memilih pengecualian pengakuan untuk tidak menerapkan pengakuan dan pengukuran berdasarkan PSAK No. 116 untuk kontrak:
1. Sewa jangka pendek dengan masa sewa 12 bulan atau kurang; dan
2. Sewa dengan aset pendasar bernilai rendah.

Bank mengakui pembayaran sewa jangka pendek dan aset bernilai rendah sebagai beban baik dengan dasar garis lurus maupun dasar sistematik lainnya yang merepresentasikan pola manfaat.

Selain itu, Bank juga memilih pilihan kebijakan untuk:
1. Tidak memisahkan kompenen nonsewa dari komponen sewa, dan memilih mencatat masing-masing komponen sewa dan komponen nonsewa terkait sebagai komponen sewa tunggal.
2. Tidak mencatat sewa atas aset tak berwujud berdasarkan PSAK No. 116.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

o. Right-of use assets and lease liabilities (continued)

b) Practical expedient, recognition exemption and accounting policy option at the transition date, Bank decided to use the practical expedient that is permitted in SFAS No. 116, as:
1. Using a single discount rate to a portfolio of leases with reasonably similar characteristics;
2. Not to apply the recognition and measurement according to SFAS No. 116 of the contracts which lease term ends within 12 months of January 1, 2021 and recorded as short term lease; and
3. Exclude intial direct cost from the measurement of the right of use assets at the date of initial application.

Bank may choose the recognition exemption not to recognize and measure according to SFAS No. 116 of the contract:
1. Short term leases for which lease term is or below 12 months; and
2. Lease for which the underlying asset is low value.

Bank recognise the lease payment of short term and low value leases as an expense on either a straight line basis over ther lease term or another systematic basis which represent the pattern of the benefit.

Besides, Bank may choose the policy option:
1. Not to separate the non-leased component from lease component, and choose to record the lease component and non-leased component as a single lease component.
2. Not to record the lease of intangible assets according to SFAS No. 116.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

o. Aset hak guna dan liabilitas sewa (lanjutan)

c) Dampak pada akuntansi *lessee*

Bank menerapkan pendekatan pengakuan dan pengukuran tunggal untuk seluruh sewa, kecuali untuk sewa jangka pendek dan sewa aset bernilai rendah. Bank mengakui liabilitas sewa untuk melakukan pembayaran sewa dan aset hak guna yang mewakili hak untuk menggunakan aset pendasar.

Bank mengakui aset hak guna dan liabilitas sewa pada tanggal permulaan sewa.

Pada tanggal permulaan sewa, aset hak guna diukur pada biaya perolehan yang meliputi jumlah pengukuran awal liabilitas sewa, biaya langsung awal yang dikeluarkan, estimasi biaya restorasi dan pembayaran sewa yang dilakukan pada atau sebelum tanggal mulai sewa dikurangi insentif sewa yang diterima. Untuk pengurukuran selanjutnya, aset hak guna dikurangi dengan akumulasi penyusutan dan kerugian penurunan nilai, serta disesuaikan untuk setiap pengukuran kembali liabilitas sewa.

Aset hak guna disusutkan dengan metode sesuai dengan persyaratan depresiasi yang ada pada aset tetap.

Jika kepemilikan aset sewa dialihkan ke Bank pada akhir masa sewa atau pembayaran sewa mencerminkan pelaksanaan opsi pembelian, penyusutan dihitung menggunakan estimasi masa manfaat ekonomis aset. Aset hak guna diuji penurunan nilainya sesuai dengan PSAK No. 236 Penurunan Nilai Aset.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

o. Right-of use assets and lease liabilities (continued)

c) Impact on lessee accounting

Bank applies a single recognition and measurement approach for the entire lease, except for the short terms and low-value lease. Bank recognises lease liabilities for the lease payments and right of use asset that represent right of use of the underlying asset

Bank recognises right of use asset and lease liabilities at the commencement date.

On the commencement date, right of use assets measured at cost, which shall comprise the amount initial measurement of lease liabilities, initial direct cost incurred, an estimate of restoration cost, and lease payments made at or before the commencement date less the rental incentives received. For the subsequent measurements, the right of use assets less the accumulated depreciation, any accumulated impairment losses, and adjusted for any remeasurement of lease liabilities.

Right of use assets depreciated by methods in accordance with the fixed assets depreciation requirements.

If the ownership of lease assets transferred to the Bank at the end of the lease term or the lease payments reflects the purchase option, then the depreciation period measured by using the estimation of asset economic benefit. The right of use asset tested for impairment in accordance with SFAS No. 236 Impairment of Asset.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

o. Aset hak guna dan liabilitas sewa (lanjutan)

Pada tanggal permulaan sewa, Bank mengakui liabilitas sewa yang diukur pada nilai kini dari pembayaran sewa masa depan yang akan dilakukan selama masa sewa. Pembayaran sewa termasuk pembayaran tetap (termasuk pembayaran tetap secara-substansi) dikurangi piutang insentif sewa, pembayaran sewa variabel yang bergantung pada indeks atau kurs, dan jumlah yang diharapkan akan dibayar dalam jaminan nilai residu. Pembayaran sewa juga termasuk harga eksekusi opsi pembelian yang wajar jika dipastikan akan dilakukan oleh Bank dan pembayaran penalti untuk mengakhiri sewa, jika jangka waktu sewa mencerminkan Bank mengeksekusi opsi penghentian sewa. Pembayaran sewa variabel yang tidak bergantung pada indeks atau kurs diakui sebagai beban pada periode di mana peristiwa atau kondisi yang memicu pembayaran terjadi.

Dalam menghitung nilai kini dari pembayaran sewa, Bank menggunakan suku bunga pinjaman inkremental penyewa pada tanggal dimulainya sewa karena suku bunga implisit dalam sewa tidak dapat ditentukan. Untuk pengukuran selanjutnya, jumlah liabilitas sewa ditingkatkan untuk mencerminkan pertambahan bunga dan dikurangi pembayaran sewa yang dilakukan. Selain itu, jumlah tercatat liabilitas sewa diukur kembali jika terdapat modifikasi, perubahan jangka waktu sewa, perubahan pembayaran sewa, atau perubahan dalam penilaian opsi untuk membeli aset pendasar.

PSAK No. 116 mengubah cara Bank menyajikan sewa yang sebelumnya diklasifikasikan sebagai sewa operasi pada PSAK No. 30, yang tidak diungkapkan dalam laporan keuangan, dengan rincian sebagai berikut:

1. Menyajikan aset hak-guna secara terpisah;
2. Menyajikan liabilitas sewa sebagai bagian dari liabilitas lain-lain;
3. Menyajikan beban penyusutan aset hak-guna dan beban bunga liabilitas sewa sebagai bagian dari beban umum dan administrasi; dan
4. Memisahkan jumlah total pembayaran ke bagian pokok (disajikan dalam kegiatan pendanaan) dan bunga (disajikan dalam kegiatan operasional) dalam laporan arus kas

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

o. Right-of use assets and lease liabilities (continued)

At the commencement date, Bank recognized the lease liabilities measured at the present value of the future lease payment during the lease term. Lease payment including the fixed payment (including substantial fixed-payments) less lease incentive receivable, variable lease payment that depend on the index or exchange rate, and the expected amount will be paid in a residual value guarantee. Lease payments also include the execution price of a reasonable purchase option if it ensured to exercise by the Bank and the penalty payment to terminate the lease, if the lease term reflects the Bank to execute the lease termination option. Variable lease payments that do not rely on the index or exchange rates recognized as expense in periods in which events or conditions that trigger payments occur.

In calculating the present value of lease payments, Bank uses the incremental borrowing rate of the lessee at the commencement date of the lease, as the implicit interest rate of the lease cannot be determined. For the subsequent measurement, amount of lease liabilities increased to reflect the increasing of interest and reduced by the lease payments. In addition, the carrying amount of lease liabilities remeasured if there is a modification, change in lease term, change of lease payment, or changes in assessment of purchase option of the underlying asset.

SFAS No. 116 changes the way of Bank presents lease that previously classified as an operating lease in SFAS No. 30, which not disclosed in financial statements, with the details of below:

1. *Present the right of use asset separately*
2. *Present the lease liabilities as part of other liabilities*
3. *Present the depreciation expense of right of use asset and interest expense of lease liabilities as part of general and administrative expenses, and*
4. *Separate the total amount of payment to the principal (presented in financing activities) and interest (presented in operational activities) in the statement of cash flow.*

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

p. Penurunan nilai aset non-keuangan

Pada setiap akhir periode pelaporan, Bank menilai apakah terdapat indikasi suatu aset mengalami penurunan nilai. Jika terdapat indikasi tersebut, maka Bank akan membuat estimasi atas jumlah terpulihkan aset tersebut.

Jumlah terpulihkan yang ditentukan untuk aset individual adalah jumlah yang lebih tinggi antara nilai wajar aset atau Unit Penghasil Kas (UPK) dikurangi biaya pelepasan dengan nilai pakainya, kecuali aset tersebut tidak menghasilkan arus kas masuk yang sebagian besar independen dari aset atau kelompok aset lain.

Jika nilai tercatat aset lebih besar daripada nilai terpulihkannya, maka aset tersebut dianggap mengalami penurunan nilai dan nilai tercatat aset diturunkan menjadi sebesar nilai terpulihkannya. Rugi penurunan nilai dari operasi yang berkelanjutan diakui pada laporan laba rugi dan penghasilan komprehensif lain sebagai "rugi penurunan nilai".

Dalam menghitung nilai pakai, estimasi arus kas masa depan neto didiskontokan ke nilai kini dengan menggunakan tingkat diskonto sebelum pajak yang menggambarkan penilaian pasar kini atas nilai waktu uang dan risiko spesifik aset.

Dalam menentukan nilai wajar dikurangi biaya pelepasan, mengacu pada PSAK No. 113: "Pengukuran Nilai Wajar" (Catatan 2d).

Kerugian penurunan nilai dari operasi yang berkelanjutan, jika ada, diakui pada laporan laba rugi dan penghasilan komprehensif lain sesuai dengan kategori biaya yang konsisten dengan fungsi aset yang diturunkan nilainya.

q. Biaya dibayar dimuka

Biaya dibayar di muka diamortisasi selama masa manfaat dengan menggunakan metode garis lurus *(straight-line method)*.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

p. Impairment of non-financial assets

The Bank assesses at each annual reporting period whether there is an indication that an asset may be impaired. If any such indication exists, Bank makes an estimate of the asset's recoverable amount.

An asset's recoverable amount is the higher of an asset's or Cash Generating Unit (CGU)'s fair value less costs of disposal and its value in use, and is determined for an individual asset, unless the asset does not generate cash inflows that are largely independent of those from other assets or groups of assets.

Where the carrying amount of an asset exceeds its recoverable amount, the asset is considered impaired and is written down to its recoverable amount. Impairment losses of continuing operations are recognized in the statement of profit or loss and other comprehensive income as "impairment losses".

In assessing the value in use, the estimated net 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.

In determining fair value less costs of disposal, refers to SFAS No. 113, "Fair Value Measurements" (Note 2d).

Impairment losses of continuing operations, if any, are recognized in the statements of profit or loss and other comprehensive income under expense categories that are consistent with the functions of the impaired assets.

q. Prepaid expenses

Prepaid expenses are amortized over the periods benefited using the straight-line method.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

r. Liabilitas segera

Liabilitas segera dicatat pada saat timbulnya kewajiban atau diterimanya perintah pemindahbukuan dari nasabah maupun dari bank lain.

Liabilitas segera dicatat berdasarkan biaya perolehan diamortisasi dan diklasifikasikan sebagai liabilitas keuangan lainnya.

s. Simpanan

Giro merupakan simpanan nasabah yang dapat digunakan sebagai alat pembayaran dan penarikannya dapat dilakukan setiap saat melalui cek atau pemindahbukuan dengan bilyet giro dan sarana perintah pembayaran lainnya. Giro dinyatakan sebesar nilai titipan pemegang giro di Bank.

Giro *Wadiah* merupakan titipan dana pihak ketiga yang setiap saat tersedia untuk dikembalikan dan dapat diberikan bonus sesuai kebijakan Bank. Giro *Wadiah* dinyatakan sebesar nilai titipan pemegang giro di Bank.

Tabungan merupakan simpanan nasabah yang penarikannya hanya dapat dilakukan nasabah sesuai dengan persyaratan tertentu yang disepakati. Tabungan dinyatakan sebesar nilai kewajiban pada pemilik tabungan.

Tabungan *Wadiah* merupakan simpanan pihak lain yang mendapatkan bonus berdasarkan kebijaksanaan Bank. Tabungan *Wadiah* dinyatakan sebesar nilai investasi pemegang tabungan di Bank.

Deposito berjangka merupakan simpanan nasabah yang penarikannya hanya dapat dilakukan nasabah pada waktu tertentu sesuai dengan perjanjian antara pemegang deposito berjangka dengan Bank. Deposito berjangka dinyatakan sebesar nilai nominal yang tercantum dalam sertifikat yang diterbitkan oleh Bank, sesuai dengan perjanjian antara pemegang deposito berjangka dengan Bank.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

r. Liabilities due immediately

This account is recorded at the time the obligations occur or upon receipt of transfer orders from customers or other banks.

Current liabilities are stated at amortized cost and classified as other financial liabilities.

s. Deposits

Demand deposits represent customer funds which can be used as payment instruments, and can be withdrawn at any time through cheque, or transferred through current account drafts and other transfer instruction media. Demand deposits are stated at the amounts entrusted to the Bank by the depositors.

Wadiah demand deposits represent entrusted third party funds which are available for withdrawal at any time and earn bonus based on the Bank's policy. Wadiah demand deposits are stated at the amounts invested by the depositors in the Bank.

Savings deposits represent customer funds which can be withdrawn by the depositors only under certain conditions. Savings deposits are stated at the agreed amounts due to the depositors.

Wadiah savings deposits represent third party funds which earn bonus based on the Bank's policy. Wadiah savings deposits are stated at the amounts invested by the depositors in the Bank.

Time deposits represent customer funds which can be withdrawn by the depositors only on specific maturity dates based on the agreements between the depositors and the Bank. Time deposits are stated at the nominal amounts stated in the certificates issued by the Bank in accordance with the agreements between the depositors and the Bank.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

s. Simpanan (lanjutan)

Simpanan nasabah diklasifikasikan sebagai liabilitas keuangan lainnya dan diukur pada biaya perolehan amortisasi menggunakan suku bunga efektif kecuali simpanan yang didasarkan pada prinsip perbankan syariah yang dinyatakan sebesar kewajiban Bank kepada nasabah. Biaya tambahan yang dapat diatribusikan secara langsung kepada perolehan simpanan nasabah, dikurangkan dari jumlah simpanan yang diterima.

t. Simpanan dari bank lain

Simpanan dari bank lain merupakan kewajiban kepada bank lain, dalam bentuk tabungan, giro, deposito berjangka dan *inter-bank call money*.

Di dalam simpanan dari bank lain termasuk simpanan syariah dalam bentuk giro *wadiah*.

Simpanan dari bank lain diklasifikasikan sebagai liabilitas keuangan lain dan diukur pada biaya perolehan diamortisasi menggunakan suku bunga efektif kecuali simpanan syariah yang dinyatakan sebesar nilai kewajiban Bank kepada nasabah. Biaya tambahan yang dapat diatribusikan secara langsung kepada perolehan simpanan dari bank lain dikurangkan dari jumlah simpanan yang diterima.

u. 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

Efek-efek yang dibeli dengan janji untuk dijual kembali disajikan sebagai aset keuangan dalam laporan posisi keuangan sebesar jumlah penjualan kembali dikurangi dengan bunga yang belum diamortisasi dan cadangan kerugian penurunan nilai.

Selisih antara harga beli dan harga jual kembali diperlakukan sebagai pendapatan bunga yang ditangguhkan (belum diamortisasi) dan diakui sebagai pendapatan selama periode sejak efek-efek tersebut dibeli hingga dijual kembali dengan menggunakan suku bunga efektif.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

s. Deposits (continued)

Deposits from customers are classified as other financial liabilities and measured at amortized cost using the effective interest method except for sharia deposits which are stated at the Bank's liability to the customers. Incremental costs that can be attributed directly to the acquisition of deposits from customers are deducted from total deposits received.

t. Deposits from other banks

Deposits from other banks represent liabilities to other banks, in the form of savings deposits, demand deposits, time deposits and inter-bank call money.

Deposits from other banks include sharia deposits in the form of wadiah demand deposits.

Deposits from other banks are classified as other financial liabilities and measured at amortized cost using the effective interest method except for sharia deposits which are stated at the Bank's liability amount to the customer. Incremental costs that can be attributed directly to the acquisition of deposits from other banks are deducted from the total deposits received.

u. Securities purchased under agreement to resell and securities sold under agreement to repurchase

Securities purchased under agreement to resell

Securities purchased under agreement to resell are presented as financial assets in the statement of financial position, at the net resale price of unamortized interest and net of allowance for impairment losses.

The difference between the purchase price and the resale price is treated as unearned interest income (unamortized) and recognized as income over the period starting from when those securities are purchased until they are resold using effective interest rate.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

u. Efek-efek yang dibeli dengan janji dijual kembali dan efek-efek yang dijual dengan janji dibeli kembali (lanjutan)

Efek-efek yang dibeli dengan janji untuk dijual kembali diklasifikasikan sebagai diukur pada biaya perolehan amortisasi.

Efek-efek yang dijual dengan janji untuk dibeli kembali disajikan sebagai liabilitas dalam laporan posisi keuangan sebesar jumlah pembelian kembali, dikurangi dengan bunga dibayar dimuka yang belum diamortisasi.

Selisih antara harga jual dan harga beli kembali diperlakukan sebagai biaya dibayar dimuka dan diakui sebagai beban selama jangka waktu sejak efek-efek tersebut dijual hingga dibeli kembali menggunakan metode suku bunga efektif.

Efek-efek yang dijual dengan janji untuk dibeli kembali diklasifikasikan sebagai liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi.

Efek-efek yang dibeli dengan janji dijual kembali atas surat berharga syariah

Bank mencatat transaksi efek-efek yang dibeli dengan janji dijual kembali mengacu ke PSAK No. 411 tentang "Akuntansi *Wa'd*" yang berlaku secara prospektif. Pada saat pengakuan awal, Bank mengklasifikasikan surat berharga syariah yang diperoleh dari transaksi jual beli pertama dalam kategori diukur pada nilai wajar melalui penghasilan komprehensif lain. Keuntungan atau kerugian dari perubahan nilai wajar diakui dalam penghasilan komprehensif lain.

v. Surat-surat berharga yang diterbitkan

Surat-surat berharga yang diterbitkan Bank adalah obligasi, *Long Term Note (LTN)* dan Sukuk *Mudharabah.*

Surat berharga yang diterbitkan diakui sebesar nilai wajar pada awalnya dan selanjutnya diukur sebesar biaya perolehan diamortisasi dengan menggunakan metode suku bunga efektif (EIR).

Biaya perolehan diamortisasi dihitung dengan memperhitungkan adanya diskonto atau premi terkait dengan pengakuan awal dan biaya transaksi yang tidak terpisah dari suku bunga efektif.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

u. Securities purchased under agreement to resell and securities sold under agreement to repurchase (continued)

Securities purchased under agreement are classified as amortized costs.

Securities sold under agreements to repurchase are presented as liabilities in the statement of financial position, at the repurchase price, net of unamortized prepaid interest.

The difference between the selling price and the repurchase price is treated as prepaid expenses and recognized as expense over the period starting from when those securities are sold until they are repurchased using the effective interest method.

Securities sold under agreement to repurchase are classified as financial liabilities measured at amortized cost.

Securities purchased under agreement to resell of sharia-compliant securities

The Bank records securities purchased under resale agreements in accordance with SFAS No. 411 on "Accounting for Wa'd" which is implemented prospectively. At initial recognition, the Bank classifies the underlying securities from the first sale and purchase transaction as at fair value through other comprehensive income. Gain or losses arising from changes in its fair value is recorded as other comprehensive income.

v. Securities issued

Securities issued by Bank consist of bonds, Long Term Note (LTN) and Sukuk Mudharabah.

The securities issued are recognized initially at fair value and subsequently measured at amortized cost using the effective interest rate method (EIR).

Amortized cost is calculated by taking into account any discount or premium associated related to the initial recognition and transaction costs that are an integral part of the effective interest rate.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

w. Pinjaman yang diterima

Pinjaman yang diterima merupakan dana yang diterima oleh Bank dari Bank Indonesia, pemerintah dan lembaga pembiayaan lain dengan kewajiban pembayaran berdasarkan perjanjian pinjaman.

Pinjaman yang diterima diakui sebesar nilai wajar pada awalnya dan selanjutnya diukur sebesar biaya perolehan diamortisasi dengan menggunakan metode suku bunga efektif (EIR). Biaya perolehan diamortisasi dihitung dengan memperhitungkan adanya diskonto atau premi terkait dengan pengakuan awal dan biaya transaksi yang tidak terpisah dari suku bunga efektif.

x. Pinjaman subordinasi

Pinjaman subordinasi diakui sebesar nilai wajar pada awalnya dan selanjutnya diukur sebesar biaya perolehan diamortisasi dengan menggunakan metode suku bunga efektif. Biaya perolehan diamortisasi dihitung dengan memperhitungkan adanya diskonto atau premi terkait dengan pengakuan awal dan biaya transaksi yang tidak terpisah dari suku bunga efektif.

y. Modal saham

Modal saham diukur pada nilai nominal untuk semua saham yang diterbitkan.

z. Saldo laba

Saldo laba merupakan saldo kumulatif dari hasil operasi Bank, pembagian dividen, penyesuaian periode sebelumnya, efek dari perubahan kebijakan akuntansi dan penyesuaian modal lainnya.

aa. Dana *syirkah* temporer

Dana *syirkah* temporer merupakan investasi dengan akad *mudharabah mutlaqah*, yaitu pemilik dana (*shahibul maal*) memberikan kebebasan kepada pengelola dana (*mudharib*/BTN Unit Syariah) dalam pengelolaan investasinya dengan keuntungan dibagikan sesuai kesepakatan. Dana *syirkah* temporer terdiri dari giro *mudharabah,* tabungan *mudharabah*, dan deposito *mudharabah.*

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

w. Fund borrowings

Fund borrowings are funds received by the Bank from Bank Indonesia, the government and other financing institutions with payment obligation based on borrowing agreements.

Fund borrowings are recognized initially at fair value and subsequently measured at amortized cost using the effective interest rate method (EIR). Amortized cost is calculated by taking into account any discount or premium associated related to the initial recognition and transaction costs that are an integral part of the effective interest rate.

x. Subordinated loans

Subordinated loans are recognized initially at fair value and subsequently measured at amortized cost using the effective interest rate method. Amortized cost is calculated by taking into account any discount or premium associated related to the initial recognition and transaction costs that are an integral part of the effective interest rate.

y. Capital stock

Capital stock is measured at par value for all shares issued.

z. Retained earnings

Retained earnings represent the cumulative balance of the Bank's results of operations, dividend distributions, prior period adjustments, effects of the changes in accounting policy and other capital adjustments.

aa. Temporary syirkah funds

Temporary syirkah funds represent investments from other parties conducted on the basis mudharabah mutlaqah contract in which the owners of the funds (shahibul maal) grant freedom to the fund manager (mudharib/BTN Sharia Unit) in the management of their investments with profit distributed based on the contract. Temporary syirkah funds consist of mudharabah current accounts, mudharabah saving deposits, and mudharabah time deposits.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

aa. Dana *syirkah* temporer (lanjutan)

Giro dan tabungan *mudharabah* merupakan investasi yang bisa ditarik kapan saja *(on call)* atau sesuai dengan persyaratan tertentu yang disepakati. Giro dan tabungan *mudharabah* dinyatakan sebesar saldo giro dan tabungan nasabah di Bank.

Deposito *mudharabah* merupakan investasi yang hanya bisa ditarik pada waktu tertentu sesuai dengan perjanjian antara pemegang deposito *mudharabah* dengan Bank. Deposito *mudharabah* dinyatakan sebesar nilai nominal sesuai dengan perjanjian antara pemegang deposito dengan Bank.

Dana *syirkah* temporer tidak dapat digolongkan sebagai kewajiban. Hal ini karena BTN Unit Syariah tidak berkewajiban untuk mengembalikan jumlah dana awal dari pemilik dana kecuali akibat kelalaian atau wanprestasi ketika mengalami kerugian. Di sisi lain dana *syirkah* temporer tidak dapat digolongkan sebagai ekuitas karena mempunyai waktu jatuh tempo dan pemilik dana tidak mempunyai hak kepemilikan yang sama dengan pemegang saham seperti hak *voting* dan hak atas realisasi keuntungan yang berasal dari aset lancar dan aset non-investasi *(current and other non-investment accounts)*.

Pemilik dana *syirkah* temporer mendapatkan imbalan bagi hasil sesuai dengan *nisbah* yang ditetapkan.

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 Bank. Pendapatan yang dibagikan adalah yang telah diterima *(cash basis)*.

Pembagian hasil usaha dilakukan berdasarkan prinsip bagi hasil usaha yaitu dari pendapatan Bank yang diterima berupa laba kotor *(gross profit margin)*.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

aa. Temporary syirkah funds (continued)

Mudharabah current accounts and saving deposits represent investment which could be withdrawn anytime (on call) or can be withdrawn based on certain agreed terms. Mudharabah current accounts and savings deposits are stated based on the customer's demand and savings deposit balance in Bank.

Mudharabah time deposits represent investment that can only be withdrawn at a certain time based on the agreement between the customer and the Bank. Mudharabah time deposits are stated at nominal amount as agreed between the deposit holder and the Bank.

Temporary syirkah fund cannot be classified as liability. This was due to the BTN Sharia Unit does not have any liability to return the initial fund to the owners, except for losses due to BTN Sharia Unit's management negligence or default of loss is incurred. On the other hand, temporary syirkah fund cannot be classified as shareholders' equity, because of the maturity period and the depositors do not have the same rights as the shareholders' such as voting rights and the rights of realized gain from current assets and other non-investment accounts.

The owner of temporary syirkah funds receives a return from the profit sharing based on a predetermined ratio.

Third parties' share on returns of temporary syirkah funds represents customer's share on the Bank's income derived from the management of their funds by the Bank 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 Bank's gross profit margin.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

aa. Dana *syirkah* temporer (lanjutan)

Pendapatan marjin dan bagi hasil atas pembiayaan yang diberikan dan atas aset produktif lainnya akan dibagikan kepada nasabah penyimpan dana dan Bank sesuai dengan proporsi dana yang dipakai dalam pembiayaan yang diberikan dan aset produktif lainnya. Selanjutnya, pendapatan marjin dan bagi hasil yang tersedia untuk nasabah tersebut kemudian dibagihasilkan ke nasabah penabung dan deposan sebagai *shahibul maal* dan Bank sebagai *mudharib* sesuai porsi bagi hasil yang telah disepakati bersama sebelumnya *(nisbah).* Pendapatan marjin dan bagi hasil dari pembiayaan dan aset produktif lainnya yang memakai dana Bank, seluruhnya menjadi milik Bank, termasuk pendapatan dari investasi Bank berbasis imbalan.

ab. Pendapatan dan beban bunga

Pendapatan dan beban bunga diakui pada laporan laba rugi dan penghasilan komprehensif lain dengan menggunakan metode suku bunga efektif. Suku bunga efektif adalah suku bunga yang secara tepat mendiskontokan estimasi pembayaran atau penerimaan 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 dari aset keuangan atau liabilitas keuangan.

Pada saat menghitung suku bunga efektif, Bank mengestimasi arus kas di masa datang dengan mempertimbangkan seluruh persyaratan kontraktual dalam instrumen keuangan tersebut, tetapi tidak mempertimbangkan kerugian kredit di masa mendatang. Perhitungan ini mencakup seluruh komisi, provisi, dan bentuk lain yang diterima oleh para pihak dalam kontrak yang merupakan bagian tidak terpisahkan dari suku bunga efektif.

Jika aset keuangan atau nilai kelompok aset keuangan serupa telah diturunkan sebagai akibat kerugian penurunan nilai, maka pendapatan bunga yang diperoleh setelahnya diakui berdasarkan suku bunga yang digunakan untuk mendiskonto arus kas masa datang dalam menghitung kerugian penurunan nilai.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

aa. Temporary syirkah funds (continued)

Margin income and profit sharing on financing facilities and other earning assets are distributed to fund owners and the Bank 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 and depositors as shahibul maal and the Bank as mudharib based on a predetermined ratio (nisbah). Margin income and profit sharing from financing facilities and other earning assets using the Bank's funds, are entirely shared for the Bank, including income from the Bank's fee-based transactions.

ab. Interest income and expense

Interest income and expenses are recognized in the statement of profit or loss and other comprehensive income using the effective interest rate method. The effective interest rate is the rate that exactly discounts the estimated future cash payments or receipts over the expected life of the financial instrument (or, where appropriate, a shorter period) to obtain the carrying amount of the financial asset or financial liability.

When calculating the effective interest rate, the Bank estimates future cash flows considering all contractual terms of the financial instrument but not future credit losses. This calculation includes all commissions, fees, and other forms received by the parties in the contract that are an integral part of the effective interest rate.

If a financial asset or group of similar financial assets' value has diminished as a result of impairment losses, interest income subsequently obtained is recognized based on the interest rate used to discount future cash flows in calculating impairment losses.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

ac. Pendapatan provisi dan komisi

Pendapatan provisi dan komisi yang berkaitan langsung dengan kegiatan pinjaman, atau pendapatan provisi dan komisi yang berhubungan dengan jangka waktu tertentu, diamortisasi sesuai dengan jangka waktu kontrak menggunakan metode suku bunga efektif dan diklasifikasikan sebagai bagian dari pendapatan bunga pada laporan laba rugi dan penghasilan komprehensif lain.

Pendapatan provisi dan komisi yang tidak berkaitan dengan kegiatan pemberian kredit atau suatu jangka waktu dan/atau terkait dengan pemberian suatu jasa, diakui sebagai pendapatan pada saat terjadinya transaksi dan dicatat pada akun pendapatan operasional lainnya.

ad. Pendapatan bagi hasil dan beban bonus secara syariah

Pendapatan bagi hasil secara syariah merupakan pendapatan *istishna*, marjin *murabahah* dan bagi hasil pembiayaan *mudharabah* dan *musyarakah* serta aset produktif lainnya yang diakui dengan menggunakan metode akrual. Beban secara syariah merupakan distribusi bonus dan bagi hasil kepada pemilik dana yang diakui berdasarkan metode akrual.

Pendapatan *istishna* diakui apabila telah terjadi penyerahan barang.

Pendapatan atas piutang *murabahah* menggunakan metode setara tingkat imbal hasil efektif (marjin efektif). Marjin efektif adalah margin yang secara tepat mendiskontokan estimasi pembayaran atau penerimaan kas di masa datang selama perkiraan umur dari piutang *murabahah*. Pada saat menghitung marjin efektif, Bank mengestimasi arus kas di masa datang dengan mempertimbangkan seluruh persyaratan kontraktual dalam instrumen keuangan tersebut, tetapi tidak mempertimbangkan kerugian piutang di masa mendatang. Perhitungan ini mencakup seluruh komisi, provisi dan bentuk lain yang diterima oleh para pihak dalam kontrak yang merupakan bagian tak terpisahkan dari marjin efektif, biaya transaksi, dan seluruh premi atau diskon lainnya.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

ac. Fees and commissions

Fees and commissions directly related to lending activities, or fee and commission income which relates to a specific period, is amortized over the term of the contract using the effective interest method and classified as part of interest income in the statement of profit or loss and other comprehensive income.

Fees and commissions that are not related to the credit activity or a period of time and/or associated with the service provided, are recognized as revenue at the time of the transaction and recorded under other operating income.

ad. Sharia profit sharing income and bonus expense

Sharia profit sharing income represents income from istishna, margin from murabahah and profit-sharing on mudharabah and musyarakah financing and other earning assets which are recognized on the accrual basis. Sharia expense represents the bonus distribution and profit-sharing to fund owners which are recognized on an accrual basis.

Income from istishna is recognized at the date of transfer of assets.

Income from murabahah receivables using the effective rate of return method (effective margin). Effective margin is the margin that precisely discounts the estimated future cash payments or receipts through the expected life of the murabahah receivables. When calculating the effective margin, Bank estimates the future cash flows considering all contractual terms of the financial instrument, but does not consider the loss of receivables in the future. This calculation includes all commissions, provision fees and other forms accepted by the parties in the contract that are an inseparable part of the effective margin, transaction costs and all other premiums or discounts.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

ad. Pendapatan bagi hasil dan beban bonus secara Syariah (lanjutan)

Pendapatan bagi hasil pembiayaan *mudharabah* dan *musyarakah* diakui pada saat diterima atau dalam periode terjadinya hak bagi hasil sesuai porsi bagi hasil (nisbah) yang disepakati.

ae. Imbalan kerja

Imbalan kerja jangka pendek

Imbalan kerja jangka pendek seperti upah, iuran jaminan sosial, cuti jangka pendek, bonus dan imbalan non-moneter lainnya diakui selama periode jasa diberikan. Imbalan kerja jangka pendek dihitung sebesar jumlah yang tidak didiskontokan.

Program pensiun iuran pasti

Iuran kepada dana pensiun sebesar persentase tertentu gaji pegawai yang menjadi peserta program pensiun iuran pasti Bank, dicadangkan dan diakui sebagai biaya ketika jasa telah diberikan oleh pegawai-pegawai tersebut. Pembayaran dikurangkan dari utang iuran. Iuran terutang dihitung berdasarkan jumlah yang tidak didiskontokan.

Program imbalan pasti dan imbalan kerja jangka panjang lainnya

Imbalan pasca-kerja dicadangkan dan diakui sebagai biaya ketika jasa telah diberikan oleh pegawai yang menjadi peserta program pensiun Bank. Imbalan kerja ditentukan berdasarkan peraturan Bank dan Undang-undang Cipta Kerja No. 11 tahun 2020 tanggal 2 November 2020 ("Undang-undang").

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

ad. Sharia profit sharing income and bonus expense (continued)

Mudharabah and musyarakah income are recognized when cash is received or in a period where the right of revenue sharing is due based on agreed portion (nisbah).

ae. Employee benefits

Short-term employee benefits

Short-term employee benefits such as wages, social security contributions, short-term compensated leaves, bonuses and other non-monetary benefits are recognized during the period when services have been rendered. Short-term employee benefits are measured using undiscounted amounts.

Defined contribution plan

Contribution payable to a pension fund equivalent to a certain percentage of salaries for qualified employees under the Bank's defined contribution plan is accrued and recognized as expense when services have been rendered by qualified employees. Actual payments are deducted from the contribution payable. Contribution payable is measured using undiscounted amounts.

Defined benefit plan and other long-term employee benefits

The post-employment benefits are accrued and recognized as expense when services have been rendered by qualified employees. The benefits are determined based on the Bank's regulations and Job Creation No. 11 year 2020 dated November 2, 2020 ("the Law").

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

ae. Imbalan kerja (lanjutan)

Program imbalan pasti dan imbalan kerja jangka panjang lainnya (lanjutan)

Imbalan pasca-kerja dan imbalan kerja jangka panjang lainnya secara aktuaris ditentukan berdasarkan metode *Projected Unit Credit*.

Pengukuran kembali atas liabilitas (aset) imbalan pasti neto, yang diakui sebagai penghasilan komprehensif lain, terdiri atas:
(i) Keuntungan dan kerugian aktuarial.
(ii) Imbal hasil atas aset program, tidak termasuk jumlah yang dimasukkan dalam bunga neto atas liabilitas (aset).
(iii) Setiap perubahan dampak batas aset, tidak termasuk jumlah yang dimasukkan dalam bunga neto atas liabilitas (aset).

Pengukuran kembali atas liabilitas (aset) imbalan pasti neto, yang diakui sebagai penghasilan komprehensif lain tidak direklasifikasi ke laba rugi pada periode berikutnya.

Untuk imbalan kerja jangka panjang lain atas biaya jasa kini, biaya bunga neto atas liabilitas (aset) imbalan pasti neto, dan pengukuran kembali liabilitas (aset) imbalan pasti neto langsung diakui pada laporan laba rugi dan penghasilan komprehensif lain tahun berjalan.

Biaya jasa lalu diakui sebagai beban pada tanggal yang lebih awal antara ketika amandemen atau kurtailmen program terjadi, dan ketika biaya restrukturisasi atau pesangon diakui, sehingga biaya jasa lalu yang belum *vested* tidak lagi dapat ditangguhkan dan diakui selama periode *vesting* masa depan.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

ae. Employee benefits (continued)

Defined benefit plan and other long-term employee benefits (continued)

The post-employment benefits and other long-term employee benefits are actuarially determined using the Projected Unit Credit Method.
Remeasurement of defined benefit liabilities (assets) net, which is recognized as other comprehensive income consist of:
(i) Actuarial gain and losses.
(ii) Return on plan assets, excluding amounts that is included in net interest on liabilities (assets).
(iii) The effect of the asset ceiling, excluding amounts included in the net interest of liabilities (assets).

Remeasurement of defined benefit liabilities (assets) - net, which is recognized as other comprehensive income is not reclassified to profit or loss in the subsequent periods.

For other long-term employee benefits which are current service cost, net interest expense of net defined benefit assets liabilities (assets), and re-measurement of liability (asset) is recognized immediately in the current year statement of profit or loss and other comprehensive income.

Past service costs are recognized as expense at the earlier date between the amendments or curtailment program occurs, and when the costs of restructuring or severance is recognized, therefore, unvested past service cost can no longer be deferred and recognized over the future vesting period.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

af. Transaksi dan saldo dalam mata uang asing

Transaksi dalam mata uang asing dicatat berdasarkan kurs yang berlaku pada saat transaksi dilakukan. Pada tanggal laporan posisi keuangan, aset dan liabilitas moneter dalam mata uang asing dijabarkan ke dalam mata uang Rupiah berdasarkan kurs *spot Reuters* pada tanggal tersebut pukul 15.00 WIB. Laba atau rugi kurs yang terjadi diakui di dalam laporan laba rugi dan penghasilan komprehensif lain tahun berjalan.

Pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022, kurs yang digunakan untuk menjabarkan mata uang asing ke dalam Rupiah adalah sebagai berikut (Rupiah penuh):

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

af. Foreign currency transactions and balances

Transactions involving foreign currencies are recorded at the rates of exchange prevailing at the time the transactions are made. At statement of financial position dates, monetary assets and liabilities denominated in foreign currencies are translated into Rupiah based on Reuters' spot rates at 15.00 WIB (West Indonesian local time) on that date. The resulting gains or losses are recognized in the statement of profit or loss and other comprehensive income for the current year.

As of December 31, 2024, 2023 and 2022, the exchange rates used in translating the foreign currencies into Rupiah are as follows (full Rupiah):

	31 Desember/ *December 31,* 2024	**31 Desember/ *December 31,* 2023**	**31 Desember/ *December 31,* 2022**	
1 Dolar Amerika Serikat	16.095,00	15.397,00	15.567,50	*1 United States Dollar*
1 Dolar Australia	10.013,51	10.520,77	10.557,88	*1 Australian Dollar*
1 Pound Sterling Inggris	20.218,54	19.626,56	18.786,09	*1 Great Britain Pound Sterling*
1 Euro Eropa	16.758,12	17.038,32	16.581,72	*1 European Euro*
1 Yen Jepang	103,03	108,88	117,81	*1 Japanese Yen*
1 Ringgit Malaysia	3.597,86	3.355,20	3.533,66	*1 Malaysian Ringgit*
1 Dolar Hong Kong	2.073,11	1.970,73	1.996,55	*1 Hong Kong Dollar*
1 Riyal Arab Saudi	4.284,00	4.106,00	4.139,00	*1 Saudi Arabian Riyal*
1 Renminbi	2.204,99	2.170,06	2.238,91	*1 Renminbi*
1 Dolar Singapura	11.844,58	11.676,34	11.592,88	*1 Singapore Dollar*

ag. Pajak penghasilan

Beban pajak tahun berjalan ditetapkan berdasarkan taksiran penghasilan kena pajak tahun berjalan. Aset dan liabilitas pajak tangguhan diakui atas perbedaan temporer aset dan liabilitas antara pelaporan komersial dan pajak pada setiap tanggal pelaporan.

Aset pajak tangguhan diakui untuk seluruh perbedaan temporer yang boleh dikurangkan dan saldo rugi fiskal yang belum dikompensasikan, sepanjang perbedaan temporer dan rugi fiskal yang belum dikompensasikan tersebut dapat dimanfaatkan untuk mengurangi laba fiskal pada masa yang akan datang.

ag. Income tax

Current tax expense is provided based on the estimated taxable income for the current year. Deferred tax assets and liabilities are recognized for temporary differences between the financial and the tax bases of assets and liabilities at each reporting date.

Deferred tax assets are recognized for all deductible temporary differences and carry forward of uncompensated tax losses to the extent that it is probable for temporary differences and carry forward of uncompensated tax losses to be utilized in deducting future taxable profit.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

ag. Pajak penghasilan (lanjutan)

Jumlah tercatat aset pajak tangguhan ditelaah pada setiap tanggal posisi keuangan dan nilai tercatat aset pajak tangguhan tersebut diturunkan apabila tidak lagi terdapat kemungkinan besar bahwa laba fiskal yang memadai akan tersedia untuk mengkompensasi sebagian atau semua manfaat aset pajak tangguhan.

Aset dan kewajiban pajak tangguhan diukur berdasarkan tarif pajak yang akan berlaku pada tahun saat aset direalisasikan atau liabilitas diselesaikan berdasarkan peraturan perpajakan yang berlaku atau yang secara substantif telah diberlakukan pada tanggal laporan posisi keuangan.

Pengaruh pajak terkait dengan penyisihan untuk dan/atau pembalikan seluruh perbedaan temporer selama tahun berjalan, termasuk pengaruh perubahan tarif pajak, diakui sebagai "Beban Pajak Penghasilan - Tangguhan" dan termasuk dalam laba atau rugi neto tahun berjalan, kecuali untuk transaksi-transaksi yang sebelumnya telah langsung dibebankan atau dikreditkan ke ekuitas.

Perubahan terhadap liabilitas pajak diakui pada saat surat ketetapan pajak diterima, atau apabila diajukan keberatan dan atau banding oleh Bank, pada saat telah ada keputusan atas banding dan atau keberatan tersebut.

Dalam menentukan jumlah pajak kini dan tangguhan, Bank memperhitungkan dampak atas posisi pajak yang tidak pasti dan tambahan pajak serta penalti. Hal ini termasuk juga melakukan evaluasi terhadap surat ketetapan pajak yang diterima dari kantor pajak.

Aset dan liabilitas atas pajak tangguhan dan pajak kini dapat saling hapus apabila terdapat hak yang berkekuatan hukum untuk melakukan saling hapus.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

ag. Income tax (continued)

The carrying amount of deferred tax assets is reviewed at each reporting date and reduced to the extent that it is no longer probable that sufficient taxable profits will be available to allow all or part of the benefit of the deferred tax assets to be utilized.

Deferred tax assets and liabilities are measured at the tax rates that are expected to apply to the year when the asset is realized or the liability is settled based on tax laws that have been enacted or substantively enacted as at statement financial position date.

The related tax effects of the provisions for and/or reversals of all temporary differences during the year, including the effect of change in tax rates, are recognized as "Income Tax Expense - Deferred" and included in the determination of net profit or loss for the year, except to the extent that they relate to items previously charged or credited to equity.

Amendment to tax obligation is recorded when an assessment letter is received or, if objected to or appealed against by the Bank, when the result of such appeal or objection is determined.

In determining the amount of current and deferred tax, the Bank takes into account the impact of uncertain tax positions and any additional taxes and penalties. This includes evaluation on tax assessment letters received from tax authorities.

Assets and liabilities on deferred tax and current tax can be offset if there is a legal enforceable right to offset.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

ah. Pelaporan segmen

Informasi segmen diungkapkan untuk memungkinkan pengguna laporan keuangan untuk mengevaluasi sifat dan dampak keuangan dari aktivitas bisnis yang mana Bank terlibat dalam lingkungan ekonomi dimana Bank beroperasi.

Segmen operasi adalah suatu komponen dari entitas:

a) Yang terlibat dalam aktivitas bisnis yang mana memperoleh pendapatan dan menimbulkan beban (termasuk pendapatan dan beban terkait dengan transaksi dengan komponen lain dari entitas yang sama);

b) Hasil operasinya dikaji ulang secara reguler oleh pengambil keputusan operasional untuk membuat keputusan tentang sumber daya yang dialokasikan pada segmen tersebut dan menilai kinerjanya; dan

c) Tersedia informasi keuangan yang dapat dipisahkan.

Bank telah mengidentifikasi dan mengungkapkan informasi keuangan berdasarkan kegiatan bisnis dimana Bank terlibat (segmen usaha). Segmen pendapatan, biaya, hasil, aset dan liabilitas, termasuk bagian yang dapat diatribusikan langsung kepada segmen, serta yang dapat dialokasikan dengan dasar yang memadai untuk segmen tersebut.

ai. Laba per saham dasar

Laba per saham dasar dihitung dengan membagi laba tahun berjalan dengan jumlah rata-rata tertimbang saham yang ditempatkan dan disetor penuh pada tahun yang bersangkutan.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

ah. Segment reporting

Segment information is disclosed to enable users of financial statements to evaluate the nature and financial effects of the business activities in which the Bank is involved in and the economic environment where the Bank operates.

An operating segment is a component of an entity:

a) That engages in business activities from which it may earn revenues and incur expenses (including revenues and expenses relating to transactions with other components of the same entity);

b) Whose operating results are reviewed regularly by the entity's chief operating decision maker to make decisions about resources to be allocated to the segment and assess its performance; and

c) For which discrete financial information is available.

The Bank identifies and discloses financial information based on the business activities in which the Bank engages (business segments) in. Segment revenues, expenses, income, assets and liabilities include ítems directly attributable to a segment as well as those that can be allocated on a reasonable basis to that segment.

ai. Basic earnings per share

Basic earnings per share is computed by dividing income for the year by the weighted average number of issued and fully paid shares during the related year.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

aj. Biaya emisi penerbitan saham

Biaya-biaya emisi efek yang terjadi sehubungan dengan penawaran saham kepada masyarakat (termasuk penerbitan hak memesan efek terlebih dahulu) dikurangkan langsung dari hasil emisi dan disajikan sebagai pengurang pada akun "Tambahan Modal Disetor - Neto", sebagai bagian dari Ekuitas pada laporan posisi keuangan.

ak. Opsi Saham

Bank telah memberikan opsi saham kepada Direksi dan pekerja pada posisi dan jabatan tertentu berdasarkan persyaratan yang telah ditetapkan. Biaya kompensasi saham pada penerbitan dihitung dengan menggunakan nilai wajar dari opsi saham tersebut dan diakui dalam akun "Beban Tenaga Kerja dan Tunjangan" menggunakan metode garis lurus selama masa tunggu *(vesting period)*. Akumulasi dari biaya kompensasi saham diakui sebagai "Opsi Saham" dalam bagian ekuitas. Penentuan nilai wajar dari opsi saham yang diberikan dihitung dengan menggunakan model penentuan harga opsi *Binomial-tree* (*Binomial-tree option pricing model).*

al. Provisi

Provisi diakui jika Bank memiliki kewajiban kini (baik bersifat hukum maupun bersifat konstruktif) yang akibat peristiwa masa lalu, besar kemungkinannya penyelesaian kewajiban tersebut mengakibatkan arus keluar sumber daya yang mengandung manfaat ekonomi dan estimasi yang andal mengenai jumlah kewajiban tersebut dapat dibuat.

Provisi ditelaah pada setiap tanggal pelaporan dan disesuaikan untuk mencerminkan estimasi terbaik yang paling kini. Jika arus keluar sumber daya untuk menyelesaikan kewajiban kemungkinan besar tidak terjadi, maka provisi dibatalkan.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

aj. Shares issuance costs

Costs related to the public offering of shares (including pre-emptive rights issue) are deducted from the proceeds and presented as a deduction from the "Additional Paid-in-Capital - Net" account, under Equity section in the statement of financial position.

ak. Stock Options

The Bank has granted stock options to the Board of Directors and employees of certain positions and levels based on established criteria. Cost of stock compensation at the issuance date is calculated using the fair value of the stock options and is recognized as part of "Salaries and Employee Benefits Expense" using the straight-line method over the vesting period. The accumulation of the stock compensation cost is recognized as "Stock Options" in the equity. The fair value of the stock options granted are calculated using the Binomial-tree option pricing model.

al. Provisions

Provisions are recognized when the Bank has a present obligation (legal or constructive) where, as a result of a past event, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate can be made of the amount of the obligation.

Provisions are reviewed at each reporting date and adjusted to reflect the current best estimate. If it is no longer probable that an outflow of resources embodying economic benefits will be required to settle the obligation, the provision is reversed.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

am. Agunan yang diambil alih

Agunan yang diambil alih disajikan dalam akun "Aset Lain-lain"

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 liabilitasnya kepada Bank. AYDA merupakan jaminan kredit yang diberikan yang telah diambil alih sebagai bagian dari penyelesaian kredit yang diberikan dan disajikan pada "Aset Lain-lain"

Agunan yang diambil alih diakui sebesar nilai neto yang dapat direalisasi atau sebesar nilai outstanding kredit yang diberikan, mana yang lebih rendah. Nilai neto 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 neto yang dapat direalisasi dari agunan yang diambil alih dibebankan ke dalam akun cadangan kerugian penurunan nilai aset. Selisih antara nilai agunan yang diambil alih dengan hasil penjualan diakui sebagai keuntungan atau kerugian pada saat penjualan.

Beban-beban yang berkaitan dengan pemeliharaan agunan yang diambil alih dibebankan dalam laporan laba rugi pada saat terjadinya.

Bila terjadi penurunan nilai yang bersifat permanen, maka nilai tercatatnya dikurangi untuk mengakui penurunan tersebut dan kerugiannya dibebankan dalam laporan laba rugi.

an. Instrumen derivatif

Instrumen keuangan derivatif diukur dan diakui di laporan posisi keuangan pada nilai wajar.

Setiap kontrak derivatif dicatat sebagai aset apabila memiliki nilai wajar positif dan sebagai liabilitas apabila memiliki nilai wajar negatif.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

am. Foreclosed collaterals

Foreclosed collaterals are included in the "Other Assets" account.

Foreclosed collaterals represent assets acquired by the Bank both from auction and non auction based on voluntary transfer by the debtor or based on debtor's approval to sell the collateral where the debtor could not fulfill their obligations to the Bank. Foreclosed collaterals represent loan collateral that were taken over as part of loans settlement and presented in "Other Assets".

Foreclosed collaterals are stated at net realizable value or stated at loan outstanding amount, whichever is lower. Net realizable value is the fair value of the foreclosed collaterals less the estimated costs to sell the assets. The excess of loan receivable over the net realizable value of the foreclosed collateral is charged to allowance for impairment losses. The difference between the recorded amount of the foreclosed collateral and the proceeds from the sale of such collateral is recorded as a gain or loss at the time of sale.

Maintenance and repair costs related to foreclosed collaterals are charged as an expense in profit or loss when incurred.

If there is permanent decline in value, the carrying amount of foreclosed collaterals is written down to recognize such permanent decline in value and any losses from such write-down is recognized in profit or loss.

an. Derivative Instruments

Derivatives financial instruments are valued and recognized in the statement of financial position at fair value net of allowance for possible losses.

Each derivatives contract is recorded as asset when the fair value is positive and as liability when the fair value is negative.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

an. Instrumen derivatif (lanjutan)

Tagihan dan liabilitas derivatif diklasifikasikan sebagai aset dan liabilitas keuangan yang diukur pada nilai wajar melalui laba rugi.

Keuntungan atau kerugian yang terjadi dari perubahan nilai wajar diakui dalam laporan laba rugi dan penghasilan komprehensif lain.

Nilai wajar instrumen derivatif ditentukan berdasarkan diskonto arus kas dan model penentu harga atau harga yang diberikan oleh broker (*quoted price*) atas instrumen lainnya yang memiliki karakteristik serupa, yang mengacu pada PSAK No. 113 ”Pengukuran Nilai Wajar” (Catatan 2d).

Keuntungan atau kerugian dari kontrak derivatif disajikan dalam laporan keuangan berdasarkan tujuan Bank atas transaksi yaitu untuk (a) lindung nilai atas nilai wajar, (b) lindung nilai atas arus kas, (c) lindung nilai atas investasi bersih pada kegiatan operasi luar negeri dan (d) instrumen perdagangan, sebagai berikut:

a. Keuntungan atau kerugian dari kontrak derivatif yang ditujukan dan memenuhi syarat sebagai instrumen lindung nilai atas nilai wajar dan keuntungan atau kerugian atas perubahan nilai wajar aset dan liabilitas yang dilindungi, diakui sebagai laba atau rugi yang dapat saling hapus dalam periode akuntansi yang sama. Setiap selisih yang terjadi menunjukkan terjadinya ketidakefektifan lindung nilai dan secara langsung diakui sebagai laba atau rugi periode berjalan.
b. Bagian efektif dari keuntungan atau kerugian atas kontrak derivatif yang ditujukan sebagai lindung nilai atas arus kas dilaporkan sebagai penghasilan komprehensif lain. Bagian yang tidak efektif dari lindung nilai dilaporkan sebagai laba atau rugi periode berjalan.
c. Keuntungan atau kerugian dari kontrak derivatif yang ditujukan sebagai lindung nilai atas investasi bersih pada kegiatan operasi luar negeri dilaporkan sebagai penghasilan komprehensif lain, sepanjang transaksi tersebut dianggap efektif sebagai transaksi lindung nilai.
d. Keuntungan atau kerugian dari kontrak derivatif yang tidak ditujukan sebagai instrumen lindung nilai (atau kontrak derivatif yang tidak memenuhi persyaratan sebagai instrumen lindung nilai) diakui sebagai laba atau rugi pada periode berjalan.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

an. Derivative Instruments (continued)

Derivatives receivable and payable are classified as financial assets and liabilities measured at fair value through profit or loss.

Gains or losses resulting from fair value changes are recognized in the statement of profit or loss and other comprehensive income.

The fair value of derivatives instruments is determined based on discounted cash flows and pricing models or quoted prices from brokers of other instruments with similar characteristics, which refers to SFAS No. 113, "Fair Value Measurement" (Note 2d).

Gains or losses from derivative contracts are presented in the financial statements based on its purpose designated upon acquisition, as (a) fair value hedge, (b) cash flow hedge, (c) net investment in a foreign operation hedge, and (d) trading instruments as follows:

a. Gain or loss on a derivative contract designated and qualified as a fair value hedging instrument and the gain or loss arising from the changes in fair value of hedged assets and liabilities is recognised as gain or loss that can be set off one another during the same accounting period/year. Any difference representing hedge ineffectiveness is directly recognized as gain or loss in current period.

b. The effective portion arising from gain or loss of derivative contracts, designated as a cash flow hedge instruments is reported as other comprehensive income. The hedge ineffective portion is recognized as a gain or loss in the current period.

c. Gain or loss arising from derivative contract that is designated as a net investment hedge in a foreign operation is reported as other comprehensive income, as long as the transactions are effectively recognized as hedge transactions.

d. Gain or loss arising from derivative contract that is not designated as a hedging instrument (or derivative contract that does not qualify as a hedging instrument) is recognized as gain or loss in current period.

3. PENGGUNAAN PERTIMBANGAN, ESTIMASI DAN ASUMSI AKUNTANSI YANG SIGNIFIKAN

Penyusunan laporan keuangan Bank mengharuskan manajemen untuk membuat pertimbangan, estimasi dan asumsi yang mempengaruhi jumlah yang dilaporkan dari pendapatan, beban, aset dan liabilitas, dan pengungkapan atas liabilitas kontinjensi, pada akhir periode pelaporan. Ketidakpastian mengenai asumsi dan estimasi tersebut dapat mengakibatkan penyesuaian material terhadap nilai tercatat aset dan liabilitas dalam periode pelaporan berikutnya.

Pertimbangan

Pertimbangan berikut ini dibuat oleh manajemen dalam rangka penerapan kebijakan akuntansi Bank yang memiliki pengaruh paling signifikan atas jumlah yang diakui dalam laporan keuangan Bank:

Usaha yang berkelanjutan

Manajemen Bank telah melakukan penilaian atas kemampuan Bank untuk melanjutkan kelangsungan usahanya dan berkeyakinan bahwa Bank memilki sumber daya untuk melanjutkan usahanya di masa mendatang. Selain itu, manajemen Bank tidak mengetahui adanya ketidakpastian material yang dapat menimbulkan keraguan yang signifikan terhadap kemampuan Bank untuk melanjutkan usahanya. Oleh karena itu, laporan keuangan telah disusun atas dasar usaha yang berkelanjutan.

Klasifikasi aset dan liabilitas keuangan

Bank menetapkan klasifikasi atas aset dan liabilitas tertentu sebagai aset keuangan dan liabilitas keuangan dengan mempertimbangkan bila definisi yang ditetapkan PSAK No. 109, "Instrumen Keuangan" dipenuhi. Dengan demikian, aset keuangan dan liabilitas keuangan diakui sesuai dengan kebijakan akuntansi Bank seperti diungkapkan pada Catatan 2d.

3. USE OF SIGNIFICANT ACCOUNTING JUDGMENTS, ESTIMATES AND ASSUMPTIONS

The preparation of the Bank's financial statements requires management to make judgments, estimates and assumptions that affect the reported amounts of revenues, expenses, assets and liabilities, and the disclosure of contingent liabilities, at the end of the reporting period. Uncertainty about these assumptions and estimates could result in outcomes that require a material adjustment to the carrying amounts of the asset and liability affected in future periods.

Judgments

The following judgments are made by management in the process of applying the Bank's accounting policies that have the most significant effects on the amounts recognized in the Bank's Financial Statements:

Going concern

The Bank's management has made an assessment of the Bank's ability to continue as a going concern and is satisfied that the Bank has the resources to continue its business for the foreseeable future. Furthermore, the management is not aware of any material uncertainties that may cast significant doubt to the Bank's ability to continue as a going concern. Therefore, the financial statements continues to be prepared on the going concern basis.

Classification of financial assets and financial liabilities

The Bank determines the classifications of certain assets and liabilities as financial assets and financial liabilities by judging if they meet the definition set forth in SFAS No. 109, "Financial Instument". Accordingly, the financial assets and financial liabilities are accounted for in accordance with the Bank's accounting policies disclosed in Note 2d.

3. PENGGUNAAN PERTIMBANGAN, ESTIMASI DAN ASUMSI AKUNTANSI YANG SIGNIFIKAN (lanjutan)

Pertimbangan (lanjutan)

Pertimbangan berikut ini dibuat oleh manajemen dalam rangka penerapan kebijakan akuntansi Bank yang memiliki pengaruh paling signifikan atas jumlah yang diakui dalam laporan keuangan Bank: (lanjutan)

Nilai wajar instrumen keuangan

Semua aset dan liabilitas dimana nilai wajar diukur atau diungkapkan dalam laporan keuangan dapat dikategorikan pada level hirarki nilai wajar, berdasarkan tingkatan input terendah yang signifikan atas pengukuran nilai wajar secara keseluruhan:

- Level 1: harga kuotasian (tanpa penyesuaian) di pasar aktif untuk aset atau liabilitas yang identik yang dapat diakses pada tanggal pengukuran.
- Level 2: input selain harga kuotasian yang termasuk dalam level 1 yang dapat diobservasi untuk aset dan liabilitas, baik secara langsung atau tidak langsung.
- Level 3: input yang tidak dapat diobservasi untuk aset dan liabilitas.

Aset keuangan yang tidak memiliki harga pasar

Bank mengklasifikasikan aset keuangan dengan mengevaluasi, antara lain, apakah nilai tersebut dikutip atau tidak di pasar aktif. Termasuk dalam evaluasi mengenai apakah aset keuangan dikutip di pasar aktif adalah penentuan apakah harga pasar dapat segera dan secara teratur tersedia, dan apakah mereka mewakili harga aktual dan teratur terjadi transaksi pasar secara *arms-length*.

Kontinjensi

Bank sedang terlibat dalam proses hukum. Perkiraan biaya kemungkinan bagi penyelesaian klaim telah dikembangkan melalui konsultasi dengan bantuan konsultan hukum Bank didasarkan pada analisis hasil yang potensial. Manajemen tidak berkeyakinan bahwa hasil dari hal ini akan mempengaruhi hasil usaha. Besar kemungkinan, bagaimanapun, bahwa hasil operasi di masa depan dapat secara material terpengaruh oleh perubahan dalam estimasi atau efektivitas dari strategi yang terkait dengan hal tersebut.

3. USE OF SIGNIFICANT ACCOUNTING JUDGMENTS, ESTIMATES AND ASSUMPTIONS (continued)

Judgments (continued)

The following judgments are made by management in the process of applying the Bank's accounting policies that have the most significant effects on the amounts recognized in the Bank's Financial Statements: (continued)

Fair value of financial instruments

All assets and liabilities in which fair value is measured or disclosed in the Financial Statements can be classified in fair value hierarchy levels, based on the lowest level of input that is significant to the overall fair value measurement:

- *Level 1: quoted prices (without adjustments) in active markets for identical assets or liabilities which are accessible at the measurement date.*
- *Level 2: inputs other than quoted prices included in level 1 that are observable for the assets and liabilities, either directly or indirectly.*
- *Level 3: inputs that are not observable for the assets and liabilities.*

Financial assets not quoted in an active market

The Bank classifies financial assets by evaluating, among others, whether the asset is quoted or not in an active market. Included in the evaluation on whether a financial asset is quoted in an active market is the determination on whether quoted prices are readily and regularly available, and whether those prices represent actual and regularly occurring market transactions on an arm's length basis.

Contingencies

The Bank is currently involved in legal proceedings. The estimate of the probable cost for the resolution of claims has been developed in consultation with the aid of the external legal counsel handling the Bank's defense in this matter and is based upon an analysis of potential results. Management does not believe that the outcome of this matter will affect the results of operations. It is probable, however, that future results of operations could be materially affected by changes in the estimates or in the effectiveness of the strategies relating to these proceedings.

3. PENGGUNAAN PERTIMBANGAN, ESTIMASI DAN ASUMSI AKUNTANSI YANG SIGNIFIKAN (lanjutan)

Pertimbangan (lanjutan)

Pertimbangan berikut ini dibuat oleh manajemen dalam rangka penerapan kebijakan akuntansi Bank yang memiliki pengaruh paling signifikan atas jumlah yang diakui dalam laporan keuangan Bank: (lanjutan)

Estimasi dan Asumsi

Asumsi utama masa depan dan sumber utama estimasi ketidakpastian lain pada tanggal pelaporan yang memiliki risiko untuk dapat menyebabkan penyesuaian yang material terhadap nilai tercatat aset dan liabilitas untuk tahun berikutnya seperti yang diungkapkan di bawah ini. Bank mendasarkan asumsi dan estimasi yang digunakan pada parameter yang tersedia pada saat laporan keuangan disusun.

Asumsi dan situasi mengenai perkembangan masa depan dapat berubah akibat perubahan pasar atau situasi yang timbul di luar kendali Bank. Perubahan tersebut dicerminkan dalam asumsi yang digunakan pada saat terjadinya.

Cadangan kerugian penurunan nilai dari kredit dan pembiayaan/piutang syariah

Bank menelaah aset keuangan mereka pada nilai wajar melalui pendapatan komprehensif lain dan aset keuangan pada biaya perolehan diamortisasi berdasarkan PSAK No. 109 yang mengharuskan untuk mengakui kerugian kredit ekspektasian pada setiap tanggal pelaporan untuk mencerminkan perubahan risiko kredit dari aset keuangan tidak pada nilai wajar melalui laba rugi. PSAK No. 109 menggabungkan informasi *forward-looking* dan historis, terkini dan yang diperkirakan ke dalam estimasi kerugian kredit ekspektasian.

3. USE OF SIGNIFICANT ACCOUNTING JUDGMENTS, ESTIMATES AND ASSUMPTIONS (continued)

Judgments (continued)

The following judgments are made by management in the process of applying the Bank's accounting policies that have the most significant effects on the amounts recognized in the Bank's Financial Statements: (continued)

Estimates and Assumptions

The key assumptions concerning the future and other key sources of estimation uncertainty at the reporting date that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next financial year are disclosed below. The Bank based its assumptions and estimates on parameters available when the financial statements were prepared.

Existing circumstances and assumptions about future developments may change due to market changes or circumstances arising beyond the control of the Bank. Such changes are reflected in the assumptions when they occur.

Allowance for impairment losses on loans and sharia financing/receivables

The Bank reviews their financial assets at fair value through other comprehensive income and financial assets at amortized cost under SFAS No. 109 which required to recognize the expected credit loss at each reporting date to reflect changes in credit risk of the financial assets not at fair value through profit or loss. SFAS No. 109 incorporates forward looking and historical, current and forecasted information into expected credit loss estimation

3. PENGGUNAAN PERTIMBANGAN, ESTIMASI DAN ASUMSI AKUNTANSI YANG SIGNIFIKAN (lanjutan)

Estimasi dan Asumsi (lanjutan)

Cadangan kerugian penurunan nilai dari kredit dan pembiayaan/piutang syariah (lanjutan)

Dalam melakukan peninjauan penurunan nilai, penilaian manajemen berikut diperlukan:

i. Penentuan apakah aset mengalami penurunan nilai berdasarkan indikator tertentu seperti, antara lain, kesulitan keuangan debitur, penurunan kualitas kredit; dan

ii. Penentuan umur kredit ekspektasian yang mencerminkan:
   a. Jumlah yang tidak bias dan probabilitas tertimbang yang ditentukan dengan mengevaluasi kemungkinan dari berbagai hasil;
   b. Nilai waktu dari uang.

Penurunan nilai untuk surat berharga

Bank menentukan bahwa surat berharga memiliki kriteria penurunan nilai yang sama dengan aset keuangan yang dicatat pada biaya perolehan diamortisasi.

Umur ekonomis dari aset tetap

Bank memperkirakan masa manfaat aset tetap berdasarkan periode dimana aset diharapkan akan tersedia untuk digunakan. Masa manfaat ekonomis aset tetap ditinjau secara berkala dan diperbarui jika memiliki ekspektasi yang berbeda dari perkiraan sebelumnya, karena kerusakan secara fisik dan teknis, atau keusangan secara komersial dan legal atau batasan lainnya atas penggunaan aset tersebut.

Selain hal tersebut, estimasi masa manfaat dari aset tetap didasarkan pada penilaian secara kolektif dengan menggunakan praktik industri, teknik evaluasi internal dan pengalaman dengan aset serupa.

Tetap dimungkinkan, bagaimanapun, bahwa hasil masa depan dapat secara material dipengaruhi oleh perubahan estimasi yang disebabkan oleh perubahan faktor-faktor tersebut di atas.

Jumlah dan saat pencatatan biaya untuk setiap periode akan dipengaruhi oleh perubahan dari faktor dan keadaan saat pencatatan. Pengurangan taksiran masa manfaat dari aset tetap akan meningkatkan beban operasional yang diakui.

3. USE OF SIGNIFICANT ACCOUNTING JUDGMENTS, ESTIMATES AND ASSUMPTIONS (continued)

Estimates and Assumptions (continued)

Allowance for impairment losses on loans and sharia financing/receivables (continued)

In carrying out the impairment review, the following management"s judgements are required:

i. Determination whether the assets is impaired based on certain indicators such as, amongst others, financial difficulties of the debtor's, deterioration of the credit quality of the debtor's; and
ii. Determination of expected credit life that reflect:
   a. An unbiased and probability-weighted amount that is determined by evaluating a range of possible outcomes;
   b. The time value of money.

Impairment of securities

The Bank determines that securities are impaired based on the same criteria as financial assets carried at amortized cost.

Useful lives of premises and equipment

The Bank estimates the useful lives of premises and equipment based on the period over which the assets are expected to be available-for-use. The estimated useful lives of premises and equipment are reviewed periodically and are updated if expectations differ from previous estimates due to physical wear and tear, technical or commercial obsolescence and legal or other limits on the use of the assets.

In addition, estimation of the useful lives of premises and equipment is based on collective assessment of industry practice, internal technical evaluation and experience with similar assets.

It is possible, however, that future results of operations could be materially affected by changes in estimates brought about by changes in factors mentioned above.

The amounts and timing of recorded expenses for any period would be affected by changes in these factors and circumstances. The reduction in the estimated useful lives of premises and equipment would increase the recorded operating expenses.

3. PENGGUNAAN PERTIMBANGAN, ESTIMASI DAN ASUMSI AKUNTANSI YANG SIGNIFIKAN (lanjutan)

Estimasi dan Asumsi (lanjutan)

Umur ekonomis dari aset tidak berwujud

Bank memperkirakan masa manfaat aset tak berwujud berdasarkan periode dimana aset diharapkan akan tersedia untuk digunakan. Masa manfaat ekonomis aset tak berwujud ditinjau secara berkala dan diperbarui jika memiliki ekspektasi yang berbeda dari perkiraan sebelumnya.

Berdasarkan rata-rata penggunaan piranti lunak pada Bank, untuk umur manfaat aset tak berwujud ditetapkan oleh unit pengelola aset tak berwujud selama 5 Tahun.

Selain hal tersebut, estimasi masa manfaat dari aset tak berwujud didasarkan pada penilaian secara kolektif dengan menggunakan praktik industri teknik evaluasi internal dan pengalaman dengan aset serupa.

Jangka waktu sewa

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 Bank cukup pasti untuk mengeksekusi opsi memperpanjang atau menghentikan sewa.

Penurunan nilai aset non-keuangan

Bank mengevaluasi penurunan nilai aset non-keuangan apabila terdapat kejadian atau perubahan keadaan yang mengindikasikan bahwa nilai tercatat aset non-keuangan tidak dapat dipulihkan kembali.

3. USE OF SIGNIFICANT ACCOUNTING JUDGMENTS, ESTIMATES AND ASSUMPTIONS (continued)

Estimates and Assumptions (continued)

Useful lives of intangible assets

The Bank estimates the useful life of intangible assets based on the period during which the assets are expected to be available for use. The economic useful life of intangible assets is reviewed periodically and updated if there are changes in expectations from previous estimates.

Based on the average usage of software at the Bank, the useful life of intangible assets is determined by the intangible asset management unit to be 5 years.

In addition, the estimate of the useful life of intangible assets is based on a collective assessment using industry practices, internal evaluation techniques, and experience with similar assets.

The lease term

The Bank determines the lease term as a non cancellable lease term, along with the period covered by the option to extend the lease if it is reasonably exercised, or any period covered by the option to terminated the lease, if it is reasonable not to exercise.

The Bank has several leases that include extention option and termination of lease term. Bank implements the assessment in evaluating whether it ensure to exercise the extention or termination option of lease. This done by taking into consideration of all relevant facts and circumstances that provide economic incentives for the extention or termination of the lease. After the commencement date, the Bank assesses the lease term, if there is an event or significant change in circumstances that are in control and affects whether the Bank is reasonable to exercise the extention or termination option of the lease.

Impairment of non-financial assets

The Bank assesses impairment of non-financial assets whenever events or changes in circumstances indicate that the carrying amount of non-financial asset may not be recoverable.

3. PENGGUNAAN PERTIMBANGAN, ESTIMASI DAN ASUMSI AKUNTANSI YANG SIGNIFIKAN (lanjutan)

Estimasi dan Asumsi (lanjutan)

Faktor-faktor penting yang dapat menyebabkan penelaahan penurunan nilai adalah sebagai berikut:

a) Kinerja yang rendah secara signifikan jika dibandingkan dengan ekspektasi dari hasil operasi historis maupun proyeksi hasil operasi di masa yang akan datang;
b) perubahan yang signifikan dalam cara penggunaan aset atau strategi bisnis secara keseluruhan; dan
c) Industri atau tren ekonomi yang secara signifikan bernilai negatif.

Bank mengakui kerugian penurunan nilai apabila nilai tercatat aset melebihi nilai yang dapat dipulihkan.

Jumlah terpulihkan adalah nilai yang lebih tinggi antara nilai wajar dikurang biaya pelepasan dengan nilai pakai aset (atau unit penghasil kas). Jumlah terpulihkan diestimasi untuk aset individual atau, jika tidak memungkinkan, untuk unit penghasil kas yang mana aset tersebut merupakan bagian daripada unit tersebut.

Pengakuan aset pajak tangguhan

Aset pajak tangguhan diakui untuk seluruh saldo rugi fiskal yang belum digunakan sejauh terdapat kemungkinan bahwa saldo rugi tersebut dapat dikompensasikan terhadap penghasilan kena pajak di masa yang akan datang.

Pertimbangan manajemen yang signifikan diperlukan untuk menentukan jumlah aset pajak tangguhan yang dapat diakui, sesuai dengan saat dan jumlah penghasilan kena pajak di masa mendatang seiring dengan strategi perencanaan pajak.

3. USE OF SIGNIFICANT ACCOUNTING JUDGMENTS, ESTIMATES AND ASSUMPTIONS (continued)

Estimates and Assumptions (continued)

The factors that the Bank considers important which could trigger an impairment review include the following:

a) significant underperformance relative to expected historical or projected future operating results;

b) significant changes in the manner of use of the acquired assets or the strategy for overall business; and
c) significant negative industry or economic trends.

The Bank recognizes an impairment loss whenever the carrying amount of an asset exceeds its recoverable amount.

The recoverable amount is the higher of an asset's (or Cash Generating Unit's) fair value less costs of disposals and its value in use. Recoverable amounts are estimated for individual assets or, if it is not possible, for the Cash Generating Unit to which the asset belongs.

Recognition of deferred tax assets

Deferred tax assets are recognized for all unused tax losses and credits to the extent that it is probable that taxable income will be available against which the losses can be utilized.

Significant management judgment is required to determine the amount of deferred tax assets that can be recognized, based upon the likely timing and level of future taxable income together with future tax planning strategies.

3. PENGGUNAAN PERTIMBANGAN, ESTIMASI DAN ASUMSI AKUNTANSI YANG SIGNIFIKAN (lanjutan)

Estimasi dan Asumsi (lanjutan)

Bank menelaah aset pajak tangguhan pada setiap tanggal laporan posisi keuangan dan mengurangi jumlah tercatat dalam hal tidak adanya lagi kemungkinan bahwa penghasilan kena pajak yang cukup akan tersedia untuk mengkompensasi sebagian atau seluruh aset pajak tangguhan.

Pertimbangan signifikan diperlukan dalam menentukan provisi perpajakan

Bank menentukan provisi perpajakan berdasarkan estimasi atas kemungkinan adanya tambahan beban pajak. Jika hasil akhir dari hal ini berbeda dengan jumlah yang dicatat semula, maka perbedaan tersebut akan berdampak terhadap laba/rugi.

Nilai kini atas kewajiban pensiun

Biaya atas program pensiun dan imbalan pasca kerja lainnya ditentukan dengan perhitungan aktuaris.

Perhitungan aktuaris melibatkan penggunaan asumsi mengenai tingkat diskonto, tingkat pengembalian yang diharapkan dari aset, kenaikan gaji di masa depan, tingkat kematian dan tingkat kecacatan. Karena program tersebut memiliki sifat jangka panjang, maka perkiraan tersebut memiliki ketidakpastian yang signifikan.

3. USE OF SIGNIFICANT ACCOUNTING JUDGMENTS, ESTIMATES AND ASSUMPTIONS (continued)

Estimates and Assumptions (continued)

The Bank reviews its deferred tax assets at each statement of financial position date and reduces the carrying amount to the extent that it is no longer probable that sufficient taxable income will be available to allow all or part of the deferred tax assets to be utilized.

Significant judgement is required in determining the provision for taxes

The Bank provides for tax provision based on estimates whether the additional taxes will be due. Where the final tax outcome of these matters is different from the amounts that were initially recorded, such differences will impact the profit/loss.

Present value of retirement obligation

The cost of defined retirement pension plan and other post employment benefits is determined using actuarial valuations.

The actuarial valuation involves making assumptions about discount rates, expected rates of return on assets, future salary increases, mortality rates and disability rate. Due to the long-term nature of these plans, such estimates are subject to significant uncertainty.

4. KAS / *4. CASH*

	31 Desember/ *December 31*, 2024		31 Desember/ *December 31*, 2023		31 Desember/ *December 31*, 2022		
	Jumlah nosional mata uang asing/ *Notional amount in foreign currencies* (angka penuh/ *full amount*)	Ekuivalen/ *Equivalent* Rupiah	Jumlah nosional mata uang asing/ *Notional amount in foreign currencies* (angka penuh/ *full amount*)	Ekuivalen/ *Equivalent* Rupiah	Jumlah nosional mata uang asing/ *Notional amount in foreign currencies* (angka penuh *full amount*)	Ekuivalen/ *Equivalent Equivalent*	
Rupiah		2.072.074		2.095.378		1.645.841	*Rupiah*
Mata uang asing							*Foreign currencies*
Dolar Amerika Serikat	1.287.963	20.730	1.183.419	18.221	711.837	11.081	*United States Dollar*
Dolar Singapura	513.134	6.078	598.715	6.991	193.883	2.248	*Singapore Dollar*
Euro Eropa	170.315	2.854	94.220	1.605	34.410	570	*European Euro*
Dolar Australia	163.485	1.637	279.700	2.943	99.490	1.050	*Australian Dollar*
Pound Sterling Inggris	38.265	774	41.035	805	2.350	44	*Great Britain Pound Sterling*
Riyal Arab Saudi	139.167	596	34.040	140	19.573	81	*Saudi Arabian Riyal*
Yen Jepang	3.255.000	335	5.497.000	598	1.310.000	154	*Japanese Yen*
Ringgit Malaysia	84.349	303	90.389	303	87.453	309	*Malaysian Ringgit*
Renminbi	61.213	135	61.204	133	26.102	58	*Renminbi*
Dolar Hong Kong	50.260	104	188.570	372	46.550	97	*Hong Kong Dollar*
		33.546		32.111		15.692	
Total		**2.105.620**		**2.127.489**		**1.661.533**	***Total***

Saldo dalam mata uang Rupiah termasuk uang pada Anjungan Tunai Mandiri (ATM) sebesar Rp297.820, Rp311.154 dan Rp270.091, masing-masing pada tanggal 31 Desember 2024, 2023 dan 2022.

The Rupiah balance includes cash in ATMs (Automated Teller Machines) of Rp297,820, Rp311,154 and Rp270,091, as of December 31, 2024, 2023 and 2022, respectively.

5. GIRO PADA BANK INDONESIA / *5. CURRENT ACCOUNTS WITH BANK INDONESIA*

	31 Desember/ *December 31*, 2024		31 Desember/ *December 31*, 2023		31 Desember/ *December 31*, 2022		
	Jumlah nosional mata uang asing/ *Notional amount in foreign currencies* (angka penuh/ *full amount*)	Ekuivalen/ *Equivalent* Rupiah	Jumlah nosional mata uang asing/ *Notional amount in foreign currencies* (angka penuh/ *full amount*)	Ekuivalen/ *Equivalent* Rupiah	Jumlah nosional mata uang asing/ *Notional amount in foreign currencies* (angka penuh *full amount*)	Ekuivalen/ *Equivalent Equivalent*	
Rupiah		21.133.838		17.607.788		25.192.737	*Rupiah*
Mata uang asing							*Foreign currency*
Dolar Amerika Serikat	99.787.638	1.606.082	34.940.135	537.973	14.402.083	224.204	*United States Dollar*
Total		**22.739.920**		**18.145.761**		**25.416.941**	***Total***

Dalam giro pada Bank Indonesia termasuk giro yang didasarkan pada prinsip perbankan syariah sebesar Rp2.720.152, Rp3.290.216 dan Rp3.381.362 masing-masing pada tanggal 31 Desember 2024, 2023 dan 2022.

Current accounts with Bank Indonesia include current accounts based on sharia banking principles amounting to Rp2,720,152, Rp3,290,216 and Rp3,381,362 as of December 31, 2024, 2023 and 2022, respectively.

6. GIRO PADA BANK LAIN / *6. CURRENT ACCOUNTS WITH OTHER BANKS*

a. Berdasarkan mata uang / *a. By currency*

	31 Desember/ *December 31*, 2024		31 Desember/ *December 31*, 2023		31 Desember/ *December 31*, 2022		
	Jumlah nosional mata uang asing/ *Notional amount in foreign currencies* (angka penuh/ *full amount*)	Ekuivalen/ *Equivalent* Rupiah	Jumlah nosional mata uang asing/ *Notional amount in foreign currencies* (angka penuh/ *full amount*)	Ekuivalen/ *Equivalent* Rupiah	Jumlah nosional mata uang asing/ *Notional amount in foreign currencies* (angka penuh *full amount*)	Ekuivalen/ *Equivalent Equivalent*	
Rupiah		130.372		234.046		540.052	*Rupiah*
Mata uang asing							*Foreign currencies*
Dolar Amerika Serikat	287.618.441	4.629.219	48.194.949	742.058	19.465.688	304.746	*United States Dollar*
Yen Jepang	6.876.408.203	708.476	7.806.707.206	849.955	3.825.323.896	450.661	*Japanese Yen*
Euro Eropa	11.867.005	198.869	4.801.220	81.805	104.380	30.893	*European Euro*
Pound Sterling Inggris	9.283.447	187.698	4.344.397	85.266	3.372.747	63.361	*Great Britain Pound Sterling*
Australia Dollar	6.287.352	62.958	16.604.307	174.690	4.480.725	47.307	*Australian Dollar*
Singapura Dollar	2.551.720	30.224	2.758.939	32.214	2.950.598	34.206	*Singapore Dollar*
Renminbi	1.782.529	3.930	1.550.357	3.364	460.499	1.031	*Renminbi*
		5.821.374		1.969.352		932.205	
Total		5.951.746		2.203.398		1.472.257	*Total*
Dikurangi cadangan kerugian penurunan nilai		(2.571)		(1.804)		(1.747)	*Less allowance for impairment losses*
Neto		**5.949.175**		**2.201.594**		**1.470.510**	***Net***

b. Berdasarkan bank / *b. By bank*

	31 Desember/ *December 31*, 2024	31 Desember/ *December 31*, 2023	31 Desember/ *December 31*, 2022	
Rupiah				*Rupiah*
Pihak Ketiga				*Third Parties*
PT Bank Maybank Indonesia Tbk	100.653	189.189	215.125	*PT Bank Maybank Indonesia Tbk*
Standard Chartered Bank, Jakarta	17.916	10.179	46.579	*Standard Chartered Bank, Jakarta*
PT Bank Central Asia Tbk	7.646	32.948	263.538	*PT Bank Central Asia Tbk*
Citibank N.A., Jakarta	925	925	925	*Citibank N.A., Jakarta*
Lainnya	1.372	357	337	*Others*
	128.512	233.598	526.504	
Pihak Berelasi (Catatan 44)				*Related Parties (Note 44)*
PT Bank Rakyat Indonesia (Persero) Tbk	1.035	52	12.350	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT Bank Negara Indonesia (Persero) Tbk	212	183	-	*PT Bank Negara Indonesia (Persero) Tbk*
PT Bank Syariah Indonesia Tbk	201	200	1.198	*PT Bank Syariah Indonesia Tbk*
PT Bank Mandiri (Persero) Tbk	412	13	-	*PT Bank Mandiri (Persero) Tbk*
	1.860	448	13.548	
Mata uang asing				*Foreign currencies*
Pihak Ketiga				*Third Parties*
Standard Chartered Bank	562.272	600.159	325.746	*Standard Chartered Bank*
PT Bank Central Asia Tbk	96.770	108.146	27.410	*PT Bank Central Asia Tbk*
PT Bank ANZ Indonesia	62.958	174.690	47.307	*PT Bank ANZ Indonesia*
PT Bank DBS Indonesia	30.224	32.214	34.206	*PT Bank DBS Indonesia*
PT Bank ICBC Indonesia	3.930	3.364	1.031	*PT Bank ICBC Indonesia*
Indonesische Overzeese Bank N.V., Amsterdam	1.749	1.778	1.731	*Indonesische Overzeese Bank N.V., Amsterdam*
	757.903	920.351	437.431	

6. GIRO PADA BANK LAIN (lanjutan)

b. Berdasarkan bank (lanjutan)

6. CURRENT ACCOUNTS WITH OTHER BANKS (continued)

b. By bank (continued)

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Mata uang asing (lanjutan)				*Foreign currencies(continued)*
Pihak Berelasi (Catatan 44)				*Related Parties (Note 44)*
PT Bank Mandiri (Persero) Tbk	4.278.290	147.591	37.26	*PT Bank Mandiri (Persero) Tbk*
PT Bank Negara Indonesia (Persero) Tbk	785.181	901.410	457.512	*PT Bank Negara Indonesia (Persero) Tbk*
	5.063.471	1.049.001	494.774	
Total	5.951.746	2.203.398	1.472.257	*Total*
Dikurangi cadangan kerugian penurunan nilai	(2.571)	(1.804)	(1.747)	*Less allowance for impairment losses*
Neto	**5.949.175**	**2.201.594**	**1.470.510**	***Net***

Dalam giro pada bank lain termasuk giro yang didasarkan pada prinsip perbankan syariah sebesar Rp201, Rp200 dan Rp1.198, masing-masing pada tanggal 31 Desember 2024, 2023 dan 2022.

Berikut adalah perubahan giro pada bank lain dengan klasifikasi biaya perolehan diamortisasi untuk tahun yang berakhir pada tanggal 31 Desember 2024, 2023 dan 2022:

Current accounts with other banks include current accounts based on sharia banking principles amounting to Rp201, Rp200 and Rp1,198, as of December 31, 2024, 2023 and 2022, respectively.

Presented below is the movements in amortized cost of current account with other banks for the years ended as of December 31, 2024, 2023 and 2022, respectively:

	31 Desember/*December 31,* 2024					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
Giro pada Bank Lain						***Current Accounts with Other Banks***
Saldo awal	2.201.420	-	1.778	200	2.203.398	*Beginning balance*
Pengukuran kembali bersih nilai tercatat	3.748.376	-	(29)	1	3.748.348	*Net remeasurement of carrying amount*
Aset keuangan baru yang diterbitkan atau dibeli	-	-	-	-	-	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	-	-	-	-	-	*Derecognized financial assets*
Saldo akhir periode	**5.949.796**	**-**	**1.749**	**201**	**5.951.746**	***Balance at the end of period***

	31 Desember/*December 31,* 2023					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
Giro pada Bank Lain						***Current Accounts with Other Banks***
Saldo awal	1.469.328	-	1.731	1.198	1.472.257	*Beginning balance*
Pengukuran kembali bersih nilai tercatat	732.092	-	47	(998)	731.141	*Net remeasurement of carrying amount*
Aset keuangan baru yang diterbitkan atau dibeli	-	-	-	-	-	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	-	-	-	-	-	*Derecognized financial assets*
Saldo akhir tahun	**2.201.420**	**-**	**1.778**	**200**	**2.203.398**	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109 "Instrumen Keuangan"

**) Not applying SFAS No. 109 "Financial Instruments"*

6. GIRO PADA BANK LAIN (lanjutan)

b. Berdasarkan bank (lanjutan)

Berikut adalah perubahan giro pada bank lain dengan klasifikasi biaya perolehan diamortisasi untuk tahun yang berakhir pada tanggal 31 Desember 2024, 2023 dan 2022 (lanjutan):

6. CURRENT ACCOUNTS WITH OTHER BANKS (continued)

b. By bank (continued)

Presented below is the movements in amortized cost of current account with other banks for the year ended as of December 31, 2024, 2023 and 2022, respectively (continued):

	31 Desember/*December 31*, 2022					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
Giro pada Bank Lain						***Current Accounts with Other Banks***
Saldo awal	1.094.220	-	1.682	896	1.096.798	*Beginning balance*
Pengukuran kembali bersih nilai tercatat	358.406	-	49	302	358.757	*Net remeasurement of carrying amount*
Aset keuangan baru yang diterbitkan atau dibeli	16.702	-	-	-	16.702	*New financial assets originated or purchased*
Saldo akhir tahun	**1.469.328**	**-**	**1.731**	**1.198**	**1.472.257**	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109 "Instrumen Keuangan"

**) Not applying SFAS No. 109 "Financial Instruments"*

c. Tingkat suku bunga rata-rata per tahun untuk giro pada bank lain adalah sebagai berikut:

c. Average annual interest rates for current accounts with other banks are as follows:

	31 Desember/ *December 31*, 2024	**31 Desember/ *December 31*, 2023**	**31 Desember/ *December 31*, 2022**	
Rupiah	0,78%	0,69%	0,19%	*Rupiah*
Mata uang asing	0,00%	0,00%	0,00%	*Foreign currencies*

d. Pada tanggal 31 Desember 2024, 2023 dan 2022, tidak terdapat saldo giro pada bank lain yang digunakan sebagai agunan.

d. As of December 31, 2024, 2023 and 2022, there are no current accounts with other banks which are pledged as collateral.

e. Perubahan cadangan kerugian penurunan nilai giro pada bank lain adalah sebagai berikut:

e. The movements in the allowance for impairment losses on current accounts with other banks are as follows:

	31 Desember/ *December 31*, 2024	**31 Desember/ *December 31*, 2023**	**31 Desember/ *December 31*, 2022**	
Saldo awal tahun	1.804	1.747	1.698	*Balance at beginning of year*
Penyisihan kerugian penurunan selama tahun berjalan (Catatan 34)	767	57	49	*Provision for impairment losses during the year (Note 34)*
Saldo akhir tahun	**2.571**	**1.804**	**1.747**	***Balance at the end of year***

*) Termasuk selisih kurs karena penjabaran mata uang asing

**) Including exchange difference on translation of foreign currency*

6. GIRO PADA BANK LAIN (lanjutan)

e. Perubahan cadangan kerugian penurunan nilai giro pada bank lain adalah sebagai berikut: (lanjutan)

6. CURRENT ACCOUNTS WITH OTHER BANKS (continued)

e. The movements in the allowance for impairment losses on current accounts with other banks are as follows: (continued)

	31 Desember/*December 31*, 2024					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
Giro pada Bank Lain						***Current Accounts with Other Banks***
Saldo awal	24	-	1.778	2	1.804	*Beginning balance*
Pengukuran kembali bersih penurunan nilai	796	-	(29)	-	767	*Net remeasurement of impairment losses*
Saldo akhir periode	**820**	**-**	**1.749**	**2**	**2.571**	***Balance at the end of period***

*) Tidak menerapkan PSAK No. 109 "Instrumen Keuangan"

**) Not applying SFAS No. 109 "Financial Instruments"*

	31 Desember/*December 31*, 2023					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
Giro pada Bank Lain						***Current Accounts with Other Banks***
Saldo awal	14	-	1.731	2	1.747	*Beginning balance*
Pengukuran kembali bersih penurunan nilai	10		47	-	57	*Net remeasurement of impairment losses*
Saldo akhir tahun	**24**	**-**	**1.778**	**2**	**1.804**	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109 "Instrumen Keuangan"

**) Not applying SFAS No. 109 "Financial Instruments"*

	31 Desember/*December 31*, 2022					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
Giro pada Bank Lain						***Current Accounts with Other Banks***
Saldo awal	14	-	1.682	2	1.698	*Beginning balance*
Pengukuran kembali bersih penurunan nilai	-	-	49	-	49	*Net remeasurement of impairment losses*
Saldo akhir tahun	**14**	**-**	**1.731**	**2**	**1.747**	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109 "Instrumen Keuangan"

**) Not applying SFAS No. 109 "Financial Instruments"*

Manajemen berpendapat bahwa jumlah cadangan kerugian atas giro pada bank lain yang dibentuk telah memadai.

The management believes that the allowance for impairment losses provided on current accounts with other banks is adequate.

f. Informasi mengenai klasifikasi aset keuangan yang mengalami penurunan nilai dan tidak mengalami penurunan nilai diungkapkan pada Catatan 45.

f. Information with respect to classification of impaired and not impaired of financial assets are disclosed in Note 45.

7. PENEMPATAN PADA BANK INDONESIA DAN BANK LAIN

7. PLACEMENTS WITH BANK INDONESIA AND OTHER BANKS

a. Berdasarkan mata uang dan jenis

a. Based on currency and type

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Rupiah				*Rupiah*
Pihak Ketiga				*Third Parties*
Deposit Facility Syariah				*Deposit Facility Sharia*
Bank Indonesia	1.810.000	3.150.000	2.078.000	*Bank Indonesia*
Deposit Facility Bank Indonesia	999.854	8.998.689	2.499.670	*Deposit Facility Bank Indonesia*
Term Deposit Bank Indonesia	-	-	7.998.224	*Term Deposit Bank Indonesia*
PT Bank Pembangunan Daerah Jawa Timur Tbk	-	-	400.000	*PT Bank Pembangunan Daerah Jawa Timur Tbk*
	2.809.854	**12.148.689**	**12.975.894**	
Pihak Berelasi (Catatan 44)				*Related Party (Note 44)*
Tabungan				*Savings Deposits*
PT Bank Mandiri (Persero) Tbk	61	61	61	*PT Bank Mandiri (Persero) Tbk*
	61	**61**	**61**	
Mata uang asing				*Foreign currencies*
Pihak Ketiga				*Third Parties*
Term Deposit Bank Indonesia	1.851.189	18.412.372	-	*Term Deposit Bank Indonesia*
	1.851.189	**18.412.372**	**-**	
Total	**4.661.104**	**30.561.122**	**12.975.955**	***Total***

Dalam penempatan pada Bank Indonesia dan bank lain termasuk penempatan yang didasarkan pada prinsip perbankan syariah sebesar Rp1.810.000, Rp3.150.000 dan Rp2.078.000, masing-masing pada tanggal 31 Desember 2024, 2023 dan 2022.

As of December 31, 2024, 2023 and 2022, placements with Bank Indonesia and other banks include placements based on sharia banking principles amounting to Rp1,810,000, Rp3,150,000 and Rp2,078,000, respectively.

b. Berdasarkan sisa umur hingga jatuh tempo

b. Based on remaining period until maturity

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
≤ 1 bulan	4.661.104	30.561.122	12.975.955	*≤ 1 month*
Total	**4.661.104**	**30.561.122**	**12.975.955**	***Total***

c. Tingkat suku bunga rata-rata per tahun untuk penempatan pada Bank Indonesia dan bank lain:

c. Average annual interest rates for placement with Bank Indonesia and other banks:

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Rupiah	5,47%	5,23%	3,47%	*Rupiah*
Mata Uang Asing	5,27%	5,24%	0,96%	*Foreign Currencies*

7. PENEMPATAN PADA BANK INDONESIA DAN BANK LAIN (lanjutan)

d. Manajemen berpendapat bahwa cadangan kerugian penurunan nilai tidak diperlukan pada tanggal 31 Desember 2024, 2023 dan 2022, karena manajemen berkeyakinan bahwa penempatan pada Bank Indonesia dan bank lain dapat ditagih.

e. Informasi mengenai klasifikasi aset keuangan yang mengalami penurunan nilai dan tidak mengalami penurunan nilai diungkapkan pada Catatan 45.

7. PLACEMENTS WITH BANK INDONESIA AND OTHER BANKS (continued)

d. Management believes no allowance for impairment losses is required as of December 31, 2024, 2023 and 2022, because management believes that placements with Bank Indonesia and other banks are fully collectible.

e. Information with respect to classification of impaired and not impaired of financial assets are disclosed in Note 45.

8. EFEK-EFEK

a. Berdasarkan tujuan, pihak berelasi dan pihak ketiga

8. SECURITIES

a. Based on purpose, related party and third party

	31 Desember/ *December 31,* 2024	**31 Desember/ *December 31,* 2023**	**31 Desember/ *December 31,* 2022**	
Pihak Ketiga				*Third Parties*
Diukur pada nilai wajar melalui laba rugi	19.358.865	1.042.013	793.831	*Fair value through profit or loss*
Diukur pada nilai wajar melalui penghasilan komprehensif lain	507.016	406.144	-	*Fair value through other comprehensive income*
Diukur pada biaya perolehan di amortisasi	8.324	6.611	79.278	*Amortized cost*
	19.874.205	1.454.768	873.109	
Pihak Berelasi (Catatan 44)				*Related Party (Note 44)*
Diukur pada nilai wajar melalui penghasilan komprehensif lain	1.457.891	1.522.192	655.293	*Fair value through other comprehensive income*
Diukur pada biaya perolehan di amortisasi	4.031.314	2.328.913	194.766	*Amortized cost*
	5.489.205	3.851.105	850.059	
Total	25.363.410	5.305.873	1.723.168	*Total*
Cadangan kerugian penurunan nilai	(787)	(22.903)	(2.399)	*Allowance for impairment losses*
Neto	**25.362.623**	**5.282.970**	**1.720.769**	***Net***

8. EFEK-EFEK (lanjutan) / *8. SECURITIES (continued)*

b. Berdasarkan mata uang, jenis dan penerbit / *b. Based on currency, type and issuer*

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Nilai wajar melalui laba rugi				*Fair value through profit or loss*
Rupiah				*Rupiah*
Pihak Ketiga				*Third Parties*
Reksadana				*Mutual Funds*
PT Syailendra Capital	-	-	100.486	*PT Syailendra Capital*
PT Berdikari Manajemen Investasi	-	-	100.470	*PT Berdikari Manajemen Investasi*
PT Batavia Prosperindo Aset Manajemen	-	-	100.460	*PT Batavia Prosperindo Aset Manajemen*
Sekuritas Rupiah				*Rupiah Securities*
Bank Indonesia	10.092.016	194.060	-	*Bank Indonesia*
Efek Beragun Aset				*Asset Backed Securities*
KIK EBA - SP -BTN 05				*KIK EBA - SP - BTN 05*
Kelas B	146.532	161.407	176.898	*Class B*
EBA - SP - BTN04				*EBA - SP - BTN04*
Kelas B	101.395	88.598	95.685	*Class B*
EBA - SP - BTN08				*EBA - SP – BTN08*
Kelas B	69.655	75.307	-	*Class B*
EBA - SP - BTN03				*EBA - SP - BTN03*
Kelas B	53.872	49.222	52.580	*Class B*
EBA - SP - BTN06				*EBA - SP - BTN06*
Kelas B	44.527	51.667	64.494	*Class B*
KIK EBA - SP -BTN 07				*KIK EBA - SP - BTN 07*
Kelas B	42.895	54.409	52.238	*Class B*
EBA - SP - BTN02				*EBA - SP - BTN02*
Kelas B	-	59.833	50.520	*Class B*
Mata Uang Asing				*Foreign Currencies*
Dolar Amerika Serikat				*United States Dollar*
Pihak ketiga				*Third parties*
Sekuritas Dollar Amerika Serikat				*United Stated Dollar Securities*
Bank Indonesia	8.807.973	307.510	-	*Bank Indonesia*
	19.358.865	1.042.013	793.831	
Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain				*Financial asset held at fair value through other comprehensive income*
Rupiah				*Rupiah*
Pihak Ketiga				*Third Parties*
Reksadana Terproteksi				*Protected Mutual Funds*
PT Batavia Prosperindo Aset Manajemen				*PT Batavia Prosperindo Aset Manajemen*
BATAVIA MAX 51	204.118	203.822	-	*BATAVIA MAX 51*
BPSM 3	100.402	-	-	*BPSM 3*
PT Manulife Aset Manajemen Indonesia				*PT Manulife Aset Manajemen Indonesia*
MANULIFE PDU V	202.496	202.322	-	*MANULIFE PDU V*
	507.016	406.144	-	
Pihak Berelasi (Catatan 44)				*Related Parties (Note 44)*
Obligasi				*Bonds*
PT Perusahaan Listrik Negara (Persero)				*PT Perusahaan Listrik Negara (Persero)*
Sukuk Tahap II Seri B 2017	51.676	51.125	52.424	*Sukuk Phase II Series B 2017*
PT Waskita Karya (Persero) Tbk				*PT Waskita Karya (Persero) Tbk*
Tahap IV Seri A 2022	49.203	49.935	48.672	*Phase IV Series A 2022*
PT Pegadaian				*PT Pegadaian*
Sukuk *Mudharabah* IV 2021	-	30.000	30.603	*Sukuk Mudharabah IV 2021*
Sukuk *Mudharabah* II 2022	27.795	27.745	28.028	*Sukuk Mudharabah II 2022*

8. EFEK-EFEK (lanjutan) / *8. SECURITIES (continued)*

b. Berdasarkan mata uang, jenis dan penerbit (lanjutan) / *b. Based on currency, type and issuer (continued)*

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain (lanjutan)				*Financial asset held at fair value through other comprehensive income (continued)*
Rupiah(lanjutan)				*Rupiah (lanjutan)*
Pihak Berelasi (Catatan 44)				*Related Parties (Note 44)*
Obligasi				*Bonds*
PT Bank Rakyat Indonesia (Persero) Tbk				*PT Bank Rakyat Indonesia (Persero) Tbk*
Tahap II Seri D 2017	25.997	26.373	26.598	*Phase II Series D 2017*
PT Sarana Multigriya Finansial (Persero)				*PT Sarana Multigriya Finansial (Persero)*
Tahap I Seri B 2021	24.856	24.962	24.647	*Phase I Series B 2021*
Tahap II 2021	24.627	24.656	24.635	*Phase II 2021*
PT Bank Mandiri Taspen				*PT Bank Mandiri Taspen*
Tahap II Seri B 2021	19.973	20.139	20.108	*Phase II Series B 2021*
Reksadana Terproteksi				*Protected Mutual Funds*
PT Bahana TCW Investment Management				*PT Bahana TCW Investment Management*
Bahana *Centrum Protected Fund* 232	308.406	307.647	-	*RDT Bahana Centrum Protected Fund 232*
PT BNI *Asset Management*				*PT BNI Asset Management*
BNI AM Proteksi Amarilis	305.896	305.072	-	*RDT BNI AM Proteksi Amarilis*
PT Danareksa *Investment Management*				*PT Danareksa Investment Management*
Danareksa Proteksi 86	254.340	254.105	-	*RDT Danareksa Proteksi 86*
PT PNM Investment *Management*				*PT PNM Investment Management*
RDT PNM Investa 48	151.373	-	-	*RDT PNM Investa 48*
Medium Term Notes				*Medium Term Notes*
Perum Perumnas				*Perum Perumnas*
Tahap III Seri A 2018	100.000	100.000	103.083	*Phase III Series A 2018*
	1.344.142	1.221.759	358.798	
Mata Uang Asing				*Foreign Currencies*
Dolar Amerika Serikat				*United States Dollar*
Pihak Berelasi (Catatan 44)				*Related Parties (Note 44)*
Obligasi				*Bonds*
PT Pertamina (Persero)				*PT Pertamina (Persero)*
Senior Unsecured Notes				*Senior Unsecured Notes*
Due 2030	29.094	28.044	27.093	*Due 2030*
Due 2050	36.506	38.295	36.038	*Due 2050*
PT Bank Mandiri (Persero) Tbk				*PT Bank Mandiri (Persero) Tbk*
Euro Medium				*Euro Medium*
Term Notes (EMTN)-2024		61.242	60.977	*Term Notes (EMTN)-2024*
Term Notes (EMTN)-2025	32.132	30.565	30.434	*Term Notes (EMTN)-2025*
PT Pelabuhan Indonesia II (Persero)				*PT Pelabuhan Indonesia II (Persero)*
Senior Notes - 2025	16.017	15.122	15.028	*Senior Notes - 2025*
PT Perusahaan Gas Negara (Persero) Tbk				*PT Perusahaan Gas Negara (Persero) Tbk*
Unsecured Fixed	-	50.638	50.944	*Unsecured Fixed*
Medium Term Notes				*Medium Term Notes*
Lembaga Pembiayaan Ekspor Indonesia				*Lembaga Pembiayaan Ekspor Indonesia*
EMTN Programme				*EMTN Programme*
Indonesia Eximbank - 2017	-	76.527	75.981	*Indonesia Eximbank – 2017*
	113.749	300.433	296.495	
	1.457.891	1.522.192	655.293	
	1.964.907	1.928.336	655.293	

8. EFEK-EFEK (lanjutan)

b. Berdasarkan mata uang, jenis dan penerbit (lanjutan)

8. SECURITIES (continued)

b. Based on currency, type and issuer (continued)

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Diukur pada biaya perolehan di amortisasi				*Amortized cost*
Rupiah				*Rupiah*
Pihak Ketiga				*Third Parties*
Obligasi				*Bonds*
PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk Tahap II Seri B 2018	-	-	77.150	*PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk Phase II Series B 2018*
PT Berlian Laju Tanker Sukuk Ijarah 2007	-	-	2.000	*PT Berlian Laju Tanker Sukuk Ijarah 2007*
Surat Kredit Berdokumen Dalam Negeri (SKBDN)	8.324	6.611	128	*Domestic Documentary Letters of Credit*
	8.324	6.611	79.278	
Pihak Berelasi (Catatan 44)				*Related Parties (Note 44)*
Obligasi				*Bonds*
PT Bank Mandiri Taspen Tahap II Seri A 2021	-	25.076	25.338	*PT Bank Mandiri Taspen Phase II Series A 2021*
PT Bank Mandiri (Persero) Tbk Tahap III 2018	-	-	5.027	*PT Bank Mandiri (Persero) Tbk Phases III 2018*
Medium Term Notes				*Medium Term Notes*
PT Bahana Pembinaan Usaha Indonesia (Persero)	50.000	50.000	50.000	*PT Bahana Pembinaan Usaha Indonesia (Persero)*
PT Dayamitra Telekomunikasi	-	50.000	-	*PT Dayamitra Telekomunikasi*
Reksadana				*Mutual Funds*
PT Permodalan Nasional Madani *Investment Management*	-	100.000	100.000	*PT Permodalan Nasional Madani Investment Management*
Sukuk				*Sukuk*
PT Angkasa Pura I Tahap I 2023 (catatan 11.f)	1.547.619	1.465.771	-	*PT Angkasa Pura I Phase I 2023 (note 11.f)*
PT Aviasi Pariwisata Indonesia Tahap I 2024 (catatan 11.f)	2.050.306	-	-	*PT Aviasi Pariwisata Indonesia Phase I 2024 (note 11.f)*
Surat Kredit Berdokumen Dalam Negeri (SKBDN)	383.389	638.066	14.401	*Domestic Documentary Letters of Credit*
	4.031.314	2.328.913	194.766	
	4.039.638	2.335.524	274.044	
Total	25.363.410	5.305.873	1.723.168	*Total*
Cadangan kerugian penurunan nilai	(787)	(22.903)	(2.399)	*Allowance for impairment losses*
Neto	**25.362.623**	**5.282.970**	**1.720.769**	***Net***

Berikut adalah perubahan efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lainnya dan yang diukur pada biaya perolehan diamortisasi untuk tahun yang berakhir 31 Desember 2024, 2023 dan 2022:

Presented below is the movements in securities at fair value through other comprehensive income and at amortized cost for the years ended December 31, 2024, 2023 and 2022:

	31 Desember/*December 31,* 2024					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
Efek-efek						***Securities***
Saldo awal	2.687.337	-	-	1.576.523	4.263.860	*Beginning balance*
Pengukuran kembali bersih nilai tercatat	14.743	-	-	82.449	97.192	*Net remeasurement of carrying amount*
Aset keuangan baru yang diterbitkan atau dibeli	260.099	-	-	2.050.306	2.310.405	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(666.912)	-	-	-	(666.912)	*Derecognized financial assets*
Aset keuangan yang dihapusbuku	-	-	-	-	-	*Write-off financial assets*
Saldo akhir periode	**2.295.267**	**-**	**-**	**3.709.278**	**6.004.545**	***Balance at the end of period***

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"

**) Not applying SFAS No. 109, "Financial Instruments"*

8. EFEK-EFEK (lanjutan)

b. Berdasarkan mata uang, jenis dan penerbit (lanjutan)

Berikut adalah perubahan efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lainnya dan yang diukur pada biaya perolehan diamortisasi untuk tahun yang berakhir 31 Desember 2024, 2023 dan 2022: (lanjutan)

8. SECURITIES (continued)

b. Based on currency, type and issuer (continued)

Presented below is the movements in securities at fair value through other comprehensive income and at amortized cost for the years ended December 31, 2024, 2023 and 2022: (continued)

	31 Desember/*December 31,* 2023					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
Efek-efek						***Securities***
Saldo awal	814.400	-	-	114.937	929.337	*Beginning balance*
Pengukuran kembali bersih nilai tercatat	30.357	-	-	(2.185)	28.172	*Net remeasurement of carrying amount*
Aset keuangan baru yang diterbitkan atau dibeli	2.003.272	-	-	1.465.771	3.469.043	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(160.692)	-	-	-	(160.692)	*Derecognized financial assets*
Aset keuangan yang dihapusbuku	-	-	-	(2.000)	(2.000)	*Writte-off financial assets*
Saldo akhir tahun	**2.687.337**	**-**	**-**	**1.576.523**	**4.263.860**	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"

**) Not applying SFAS No. 109, "Financial Instruments"*

	31 Desember/*December 31,* 2022					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
Efek-efek						***Securities***
Saldo awal	1.432.209	-	-	111.751	1.543.960	*Beginning balance*
Pengukuran kembali bersih nilai tercatat	(442.631)	-	-	143	(442.488)	*Net remeasurement of carrying amount*
Aset keuangan baru yang diterbitkan atau dibeli	761.634	-	-	28.176	789.810	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(936.812)	-	-	(25.133)	(961.945)	*Derecognized financial assets*
Saldo akhir tahun	**814.400**	**-**	**-**	**114.937**	**929.337**	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"

**) Not applying SFAS No. 109, "Financial Instruments"*

c. Jatuh tempo dan suku bunga

c. Maturity and interest rate

Penerbit	**Jenis/** ***Type***	**Tanggal Jatuh Tempo/** ***Maturity Date***	**Suku Bunga/ Bagi Hasil Per Tahun/** ***Annual Interest Rate/ Profit Sharing***	***Issuer***
Rupiah				*Rupiah*
Perum Perumnas				*Perum Perumnas*
MTN Tahap III Tahun 2018 Seri A	*Medium Term Notes*	10 Desember/ *December 10,* 2026	11,85% tetap/ *fixed*	*MTN Phase III Year 2018 Series A*
PT Angkasa Pura I				*PT Angkasa Pura I*
Sukuk *Wakalah Bi Al-Istitsmar* 2023	Obligasi/*Bonds*	29 Oktober/ *October 29,* 2033	3,50% mengambang/ *floating*	*Sukuk Wakalah Bi Al-Istitsmar 2023*
PT Aviasi Pariwisata Indonesia				*PT Aviasi Pariwisata Indonesia*
Sukuk *Wakalah Bi Al-Istitsmar* 2024	Obligasi/*Bonds*	30 September/ *September 30,* 2034	2,42% mengambang/ *floating*	*Sukuk Wakalah Bi Al-Istitsmar 2024*

8. EFEK-EFEK (lanjutan)

c. Jatuh tempo dan suku bunga (lanjutan)

8. SECURITIES (continued)

c. Maturity and interest rate (continued)

Penerbit	Jenis/ *Type*	Tanggal Jatuh Tempo/ *Maturity Date*	Suku Bunga/ Bagi Hasil Per Tahun/ *Annual Interest Rate/ Profit Sharing*	*Issuer*
Rupiah				*Rupiah*
PT Bahana Pembinaan Usaha Indonesia (Persero) MTN Tahun 2022 Seri A	*Medium Term Notes*	2 November/ *November 2,* 2027	9,00% tetap/ *fixed*	*PT Bahana Pembinaan Usaha Indonesia (Persero) MTN Year 2022 Series A*
PT Bank Rakyat Indonesia (Persero) Tbk Tahap II Seri D 2017	Obligasi/*Bonds*	11 April/ *April 11,* 2027	8,80% tetap/ *fixed*	*PT Bank Rakyat Indonesia (Persero) Tbk Phase II Series D 2017*
PT Sarana Multigriya Finansial (Persero) Tahap II 2021	Obligasi/*Bonds*	17 November/ November 17, 2026	6,00% tetap/ fixed	*PT Sarana Multigriya Finansial (Persero) Phase II 2021*
Tahap I Seri B 2021	Obligasi/*Bonds*	8 Juli/ *July 8,* 2026	6,40% tetap/ *fixed*	*Phase I Series B 2021*
PT Bank Mandiri Taspen Tahap II Seri A 2021	Obligasi/*Bonds*	28 April/ *April 28,* 2024	6,5% tetap/ *fixed*	*PT Bank Mandiri Taspen Phase II Series A 2021*
Tahap II Seri B 2021	Obligasi/*Bonds*	26 April/ *April 26,* 2026	7,25% tetap/ *fixed*	*Phase II Series B 2021*
PT Perusahaan Listrik Negara (Persero) Sukuk Tahap II Seri B 2017	Obligasi/*Bonds*	3 November/ *November 3, 2027*	8,20% tetap/ *fixed*	*PT Perusahaan Listrik Negara (Persero) Sukuk Phase II Series B 2017*
PT Waskita Karya Realty Seri A 2022	Obligasi/Bonds	12 Mei/ *May 12,* 2027	6,65% tetap/ *fixed*	*PT Waskita Karya Realty Series A 2022*
PT Pegadaian (Persero) Sukuk *Mudharabah* IV 2021	Obligasi/*Bonds*	6 April/ *April 6,* 2024	6,00% tetap/ *fixed*	*PT Pegadaian (Persero) Sukuk Mudharabah IV 2021*
Sukuk *Mudharabah* II 2022	Obligasi/*Bonds*	16 Agustus/ *August 16,* 2025	5,75% tetap/ *fixed*	*Sukuk Mudharabah II 2022*
Mata Uang Asing				*Foreign Currencies*
Dolar Amerika Serikat				*United States Dollar*
PT Bank Mandiri (Persero) Tbk *Euro Medium Term Notes (EMTN) - 2024*	Obligasi/*Bonds*	11 April/ *April 11,* 2024	3,75% tetap/ *fixed*	*PT Bank Mandiri (Persero) Tbk Euro Medium Term Notes (EMTN) - 2024*
Term Notes (EMTN) - 2025	Obligasi/*Bonds*	13 Mei/ *May 13,* 2025	4,75% tetap/ *fixed*	*Term Notes (EMTN) - 2025*
PT Pertamina (Persero) *Senior Unsecured Notes Due 2030*	Obligasi/*Bonds*	*21 Januari/ January 21,* 2030	3,10% tetap/ *fixed*	*PT Pertamina (Persero) Senior Unsecured Notes Due 2030*
Senior Unsecured Notes Due 2050	Obligasi/*Bonds*	21 Januari/ *January 21,* 2050	4,18% tetap/ *fixed*	*Senior Unsecured Notes Due 2050*
PT Pelabuhan Indonesia II (Persero) *Senior Unsecured Notes Due 2025*	Obligasi/*Bonds*	*5 Mei/ May 5,* 2025	4,25% tetap/ *fixed*	*PT Pelabuhan Indonesia II (Persero) Senior Unsecured Notes Due 2025*

8. EFEK-EFEK (lanjutan)

d. Berdasarkan sisa umur hingga jatuh tempo (efek-efek yang diukur pada biaya perolehan di amortisasi)

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
≤ 1 tahun	391.713	448.505	96.706	*≤ 1 year*
> 1 tahun ≤ 5 tahun	50.000	421.248	175.338	*> 1 year ≤ 5 years*
> 5 tahun ≤ 10 tahun	3.597.925	1.465.771	-	*> 5 year ≤ 10 years*
> 10 tahun	-	-	2.000	*> 10 years*
Total	**4.039.638**	**2.335.524**	**274.044**	***Total***

e. Peringkat

Daftar peringkat efek-efek seperti yang dilaporkan oleh PT Pemeringkat Efek Indonesia adalah sebagai berikut:

8. SECURITIES (continued)

d. Remaining period to maturity (amortized cost securities)

e. Rating

The ratings of securities, as reported by PT Pemeringkat Efek Indonesia, are as follows:

Penerbit	Jenis/ *Type*	31 Desember *December 31, 2024*	31 Desember/ *December 31, 2023*	31 Desember/ *December 31, 2022*	*Issuer*
PT Bank Pembangunan Jawa Barat dan Banten Tbk *Tahap II 2018 B*	Obligasi/*Bonds*	-	-	idAA	PT Bank Pembangunan *Jawa Barat dan Banten Tbk Phase II 2018*
PT Bank Mandiri (Persero) Tbk Tahap III 2018	Obligasi/*Bonds*	-	-	idAAA	*PT Bank Mandiri (Persero) Tbk Phase III 2018*
Euro Medium Term Notes (EMTN) - 2024	Obligasi/*Bonds*	-	Baa2*)	Baa2*)	*Euro Medium Term Notes (EMTN) - 2024*
Term Notes (EMTN) - 2025	Obligasi/*Bonds*	Baa2*)	Baa2*)	Baa2*)	*Term Notes (EMTN) - 2025*
PT Bank Mandiri Taspen Tahap II Seri A 2021	Obligasi/*Bonds*	-	AA**)	AA**)	*PT Bank Mandiri Taspen Phase II Series A 2021*
Tahap II Seri B 2021	Obligasi/*Bonds*	idAAA	AA**)	AA**)	*Phase II Series B 2021*
PT Sarana Multigriya Finansial (Persero) Tahap II 2021	Obligasi/*Bonds*	idAAA	idAAA	idAAA	*PT Sarana Multigriya Finansial (Persero) Phase II 2021*
Tahap I Seri B 2021	Obligasi/*Bonds*	idAAA	idAAA	idAAA	*Phase I Series B 2021*
PT Perusahaan Gas Negara (Persero) Tbk *Unsecured Fixed Term Notes (EMTN)* - 2024	Obligasi/*Bonds*	-	Baa2*)	Baa2*)	*PT Perusahaan Gas Negara (Persero) Tbk Unsecured Fixed Term Notes (EMTN) - 2024*
PT Pertamina (Persero) *Unsecured Fixed Term Notes (EMTN)* - 2030	Obligasi/*Bonds*	Baa2*)	Baa2*)	Baa2*)	*PT Pertamina (Persero) Unsecured Fixed Term Notes (EMTN) - 2030*
Term Notes (EMTN) - 2050	Obligasi/*Bonds*	Baa2*)	Baa2*)	Baa2*)	*Term Notes (EMTN) - 2050*
Perum Perumnas MTN Tahap III Tahun 2018 Seri A	*Medium Term Notes*	idBBB-	idBBB-	idBBB-	*Perum Perumnas MTN Phase III Year 2018 Series A*
PT Dayamitra Telekomunikasi MTN Tahap I Tahun 2023	*Medium Term Notes*	-	idAAA	-	*PT Dayamitra Telekomunikasi MTN Phase I Year 2023*
PT Bahana Pembinaan Usaha Indonesia (Persero) MTN Tahun 2022	*Medium Term Notes*	idAAA	idAAA	idAAA	*PT Bahana Pembinaan Usaha Indonesia (Persero) MTN Year 2022*
Lembaga Pembiayaan Ekspor Indonesia *Euro Medium Term Notes (EMTN)* - 2017	Obligasi/*Bonds*	-	Baa2*)	Baa2*)	*Lembaga Pembiayaan Ekspor Indonesia Euro Medium Term Notes (EMTN) – 2017*
PT Waskita Karya (Persero) Tbk Seri A 2022	Obligasi/*Bonds*	idAAA(gg)	idAAA(gg)	idAAA(gg)	*PT Waskita Karya (Persero) Tbk Series A 2022*

*) Berdasarkan peringkat yang diterbitkan oleh Moody's
**) Berdasarkan peringkat yang diterbitkan oleh Fitch

**) Based on ratings published by Moody's*
***) Based on ratings published by Fitch*

8. EFEK-EFEK (lanjutan)

e. Peringkat (lanjutan)

Daftar peringkat efek-efek seperti yang dilaporkan oleh PT Pemeringkat Efek Indonesia adalah sebagai berikut: (lanjutan)

8. SECURITIES (continued)

e. Rating (continued)

The ratings of securities, as reported by PT Pemeringkat Efek Indonesia, are as follows: (continued)

Penerbit	Jenis/ *Type*	31 Desember *December 31, 2024*	31 Desember/ *December 31, 2023*	31 Desember/ *December 31, 2022*	*Issuer*
PT Pelabuhan Indonesia II (Persero) *Senior Unsecured Notes Due* 2025	Obligasi/*Bonds*	Baa2*)	Baa2*)	Baa3*)	*PT Pelabuhan Indonesia II (Persero) Senior Unsecured Notes Due 2025*
PT Bank Rakyat Indonesia (Persero) Tbk Tahap II Seri D 2017	Obligasi/*Bonds*	idAAA	idAAA	idAAA	*PT Bank Rakyat Indonesia (Persero) Tbk Phase II Series D 2017*
PT Perusahaan Listrik Negara (Persero) *Sukuk* Tahap II 2017 Seri B	Obligasi/*Bonds*	idAAA(sy)	idAAA(sy)	idAAA(sy)	*PT Perusahaan Listrik Negara (Persero) Sukuk Phase II 2017 Series B*
PT Angkasa Pura I *Sukuk* Tahap I 2023	Obligasi/*Bonds*	idAAA(sy)	idAA+(sy)	-	*PT Angkasa Pura I Sukuk Phase I 2023*
PT Pegadaian (Persero)					*PT Pegadaian (Persero)*
Sukuk *Mudharabah* IV 2021	Obligasi/*Bonds*	-	idAAA(Sy)	idAAA(Sy)	*Sukuk Mudharabah IV 2021*
Sukuk Mudharabah II 2022	Obligasi/Bonds	idAAA(sy)	idAAA(Sy)	idAAA(Sy)	*Sukuk Mudharabah II 2022*
PT Aviasi Pariwisata Ind *Sukuk* Tahap I 2024	Obligasi/*Bonds*	idAAA(sy)	-	-	*PT Aviasi Pariwisata Ind Sukuk Phase I 2024*

*) Berdasarkan peringkat yang diterbitkan oleh Moody's
**) Berdasarkan peringkat yang diterbitkan oleh Fitch

) Based on ratings published by Moody's
***) Based on ratings published by Fitch*

f. Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut:

f. The movements in the allowance for impairment losses are as follows:

	31 Desember/*December 31,* 2024					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
Efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lainnya						***Securities at fair value through other comprehensive income***
Saldo awal	59.957	-	-	-	59.957	*Beginning balance*
Pengukuran kembali bersih penurunan nilai	2.754	-	-	-	2.754	*Net remeasurement of impairment losses*
Aset keuangan baru yang diterbitkan atau dibeli	-	-	-	-	-	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(261)	-	-	-	(261)	*Derecognized financial assets*
Pembayaran kembali valuta asing dan perubahan lain	2.485	-	-	-	2.485	*Repayment foreign exchange and other movement*
Saldo akhir periode	**64.935**	**-**	**-**	**-**	**64.935**	***Balance at the end of period***

	31 Desember/*December 31,* 2023					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
Efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lainnya						***Securities at fair value through other comprehensive income***
Saldo awal	51.959	-	-	-	51.959	*Beginning balance*
Pengukuran kembali bersih penurunan nilai	4.902	-	-	-	4.902	*Net remeasurement of impairment losses*
Aset keuangan baru yang diterbitkan atau dibeli	790	-	-	-	790	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(3.618)	-	-	-	(3.618)	*Derecognized financial assets*
Pembayaran kembali valuta asing dan perubahan lain	5.924	-	-	-	5.924	*Repayment foreign exchange and other movement*
Saldo akhir tahun	**59.957**	**-**	**-**	**-**	**59.957**	***Balance at the end of year***

8. EFEK-EFEK (lanjutan)

f. Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut: (lanjutan)

8. SECURITIES (continued)

f. The movements in the allowance for impairment losses are as follows: (continued)

31 Desember/*December 31*, 2022

	Stage 1	Stage 2	Stage 3	Syariah*)	Total	
Efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lainnya						***Securities at fair value through other comprehensive income***
Saldo awal	71.617	-	-	-	71.617	*Beginning balance*
Pengukuran kembali bersih penurunan nilai	(20.889)	-	-	-	(20.889)	*Net remeasurement of impairment losses*
Aset keuangan baru yang diterbitkan atau dibeli	238	-	-	-	238	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(3.088)	-	-	-	(3.088)	*Derecognized financial assets*
Pembayaran kembali valuta asing dan perubahan lain	4.081	-	-	-	4.081	*Repayment foreign exchange and other movement*
Saldo akhir tahun	**51.959**	**-**	**-**	**-**	**51.959**	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"

**) Not applying SFAS No. 109, "Financial Instruments"*

31 Desember/*December 31*, 2024

	Stage 1	Stage 2	Stage 3	Syariah*)	Total	
Efek-efek yang diukur pada biaya perolehan diamortisasi						***Securities at amortized cost***
Saldo awal	22.534	-	-	369	22.903	*Beginning balance*
Pengukuran kembali bersih penurunan nilai	(26)	-	-	(56)	(82)	*Net remeasurement of Impairment losses*
Aset keuangan baru yang diterbitkan atau dibeli	1	-	-	439	440	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(22.474)	-	-	-	(22.474)	*Derecognized financial assets*
Saldo akhir periode	**35**	**-**	**-**	**752**	**787**	***Balance at the end of period***

31 Desember/*December 31*, 2023

	Stage 1	Stage 2	Stage 3	Syariah*)	Total	
Efek-efek yang diukur pada biaya perolehan diamortisasi						***Securities at amortized cost***
Saldo awal	399	-	-	2.000	2.399	*Beginning balance*
Pengukuran kembali bersih penurunan nilai	22.135	-	-	-	22.135	*Net remeasurement of Impairment losses*
Aset keuangan baru yang diterbitkan atau dibeli	-	-	-	369	369	*New financial assets originated or purchased*
Aset keuangan yang dihapusbuku	-	-	-	(2.000)	(2.000)	*Write off financial assets*
Saldo akhir tahun	**22.534**	**-**	**-**	**369**	**22.903**	***Balance at the end of year***

31 Desember/*December 31*, 2022

	Stage 1	Stage 2	Stage 3	Syariah*)	Total	
Efek-efek yang diukur pada biaya perolehan diamortisasi						***Securities at amortized cost***
Saldo awal	-	-	-	2.000	2.000	*Beginning balance*
Aset keuangan baru yang diterbitkan atau dibeli	399	-	-	-	399	*New financial assets originated or purchased*
Saldo akhir tahun	**399**	**-**	**-**	**2.000**	**2.399**	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"

**) Not applying SFAS No. 109, "Financial Instruments"*

g. Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai efek-efek yang dibentuk telah memadai.

g. Management believes that the allowance for impairment losses provided on securities is adequate.

8. EFEK-EFEK (lanjutan)

h. Bank mengakui keuntungan (kerugian) bersih atas penjualan efek-efek masing-masing sebesar Rp932.900, Rp6.669 dan Rp(234.089), masing-masing untuk tahun yang berakhir pada tanggal 31 Desember 2024, 2023 dan 2022 yang disajikan dalam akun "Keuntungan (kerugian) dari penjualan efek-efek - neto" di laporan laba rugi dan penghasilan komprehensif lain.

i. Nilai pasar efek-efek yang diklasifikasikan sebagai "Nilai Wajar melalui Laba Rugi dan Aset Keuangan yang Diukur pada Nilai Wajar Melalui Penghasilan Komprehensif lain" pada tanggal 31 Desember 2024, 2023 dan 2022, masing-masing berkisar dari 93,14% sampai dengan 108,00%, 82,91% sampai dengan 105,49% dan 77,16% sampai dengan 125,88%.

j. Bank mengakui keuntungan yang belum direalisasi bersih (setelah pajak tangguhan) sebesar Rp77.551, Rp67.906 dan Rp35.792 dari perubahan nilai wajar efek-efek diukur pada nilai wajar melalui penghasilan komprehensif lain termasuk cadangan kerugian penurunan nilai sebesar Rp64.935, Rp59.957 dan Rp51.959 masing-masing pada posisi 31 Desember 2024, 2023 dan 2022 dalam akun keuntungan yang belum direalisasi atas efek-efek dan obligasi pemerintah setelah pajak tangguhan dalam laporan posisi keuangan.

k. Terdapat investasi efek-efek dengan pihak-pihak berelasi sebesar Rp5.489.205, Rp3.851.105 dan Rp850.059, masing-masing pada tanggal 31 Desember 2024, 2023 dan 2022 (Catatan 44).

l. Informasi mengenai klasifikasi aset keuangan yang mengalami penurunan nilai dan tidak mengalami penurunan nilai diungkapkan pada Catatan 45.

8. SECURITIES (continued)

h. The Bank recognized net gain (loss) on sale of securities amounting to Rp932,900, Rp6,669 and Rp(234,089), for the year ended December 31, 2024, 2023 and 2022, respectively, which is presented in the statement of profit or loss and other comprehensive income as "Gain (losses) on sale of securities - net".

i. As of December 31, 2024, 2023 and 2022, the market values of securities classified as fair value through profit or loss and Fair Value Through Other Comprehensive Income of nominal amounts range from 93.14% to 108.00%, 82.91% to 105.49% and range from 77.16% to 125.88% respectively.

j. The Bank recognized unrealized gain - net (after deferred tax) of Rp77,551, Rp67,906 and Rp35,792 from the changes in fair values through other comprehensive income include allowance for impairment losses amounted Rp64,935, Rp59,957 and Rp51,959 as of December 31, 2024, 2023 and 2022, respectively, which are presented as unrealized gain (loss) on securities and government bonds, net of deferred tax in the statement of financial position.

k. As of December 31, 2024, 2023 and 2022, investments in securities with related parties amounted to Rp5,489,205, Rp3,851,105 and Rp850,059, respectively (Note 44).

l. Information with respect to classification of impaired and not impaired financial assets are disclosed in Note 45.

9. OBLIGASI PEMERINTAH

a. Berdasarkan tujuan, pihak berelasi dan pihak ketiga

9. GOVERNMENT BONDS

a. Based on purpose, related party and third party

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Pihak Berelasi (Catatan 44)				*Related Party (Note 44)*
Diukur pada nilai wajar melalui laba rugi	3.265.550	3.796.440	19.591.199	*Fair value through profit or loss*
Diukur pada nilai wajar melalui penghasilan komprehensif lain	14.109.049	12.511.991	14.332.949	*Fair value through other comprehensive income*
Diukur pada biaya perolehan amortisasi	18.100.930	19.585.498	18.040.825	*Amortized cost*
Total	**35.475.529**	**35.893.929**	**51.964.973**	***Total***

9. OBLIGASI PEMERINTAH (lanjutan) / *9. GOVERNMENT BONDS (continued)*

b. Berdasarkan mata uang dan jenis / *b. Based on currency and type*

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Pihak berelasi				*Related parties*
Nilai wajar melalui laba rugi				*Fair value through profit or loss*
Rupiah				*Rupiah*
Tingkat bunga tetap				*Fixed interest rate*
FR 0100	367.242	-	-	*FR 0100*
FR 0103	245.038	-	-	*FR 0103*
FR 0104	235.185	-	-	*FR 0104*
FR 0102	227.399	-	-	*FR 0102*
FR 0097	204.262	36.310	701	*FR 0097*
FR 0087	181.347	-	30.396	*FR 0087*
FR 0101	177.946	30.504	-	*FR 0101*
FR 0083	175.479	9.723	11.643	*FR 0083*
FR 0075	88.635	156.057	206	*FR 0075*
FR 0098	86.948	41.970	-	*FR 0098*
FR 0096	59.965	20.814	52.743	*FR 0096*
FR 0091	53.874	19.791	73.201	*FR 0091*
FR 0079	44.316	28.757	-	*FR 0079*
FR 0064	37.004	-	10.370	*FR 0064*
FR 0068	34.032	-	54.890	*FR 0068*
FR 0078	31.349	-	9.002	*FR 0078*
FR 0059	30.042	7.119	-	*FR 0059*
FR 0072	27.252	22.568	23.366	*FR 0072*
FR 0082	24.994	-	-	*FR 0082*
FR 0071	24.957	-	88.494	*FR 0071*
FR 0065	22.433	-	97	*FR 0065*
FR 0095	19.869	15.771	70.191	*FR 0095*
FR 0090	14.557	7.044	33.017	*FR 0090*
FR 0056	10.211	-	-	*FR 0056*
ORI 024T6	7.294	-	-	*ORI 024T6*
FR 0062	6.053	196	-	*FR 0062*
ORI 021	4.988	20.894	496	*ORI 021*
FR 0086	3.925	170.509	-	*FR 0086*
ORI 025T3	3.610	-	-	*ORI 025T3*
FR 0076	3.181	211	-	*FR 0076*
ORI 023T3	2.510	-	-	*ORI 023T3*
PBS 033	1.641	19.214	-	*PBS 033*
FR 0093	1.418	2.438	290	*FR 0093*
ORI 023T6	1.158	-	-	*ORI 023T6*
FR 0089	1.066	7.399	-	*FR 0089*
SR 019T3	1.031	-	-	*SR 019T3*
PBS 037	1.000	-	-	*PBS 037*
PBS 017	993	-	51.220	*PBS 017*
PBS 015	988	-	-	*PBS 015*
ORI 022	792	11.436	-	*ORI 022*
SR 0017	694	-	198	*SR 0017*
SR 0016	547	5.486	-	*SR 0016*
FR 0081	499	201.564	-	*FR 0081*
SR 020T5	304	-	-	*SR 020T5*
FR 0084	301	59.682	20.526	*FR 0084*
FR 0088	282	1.455	65	*FR 0088*
SR 018T3	272	-	-	*SR 018T3*
ORI 024T3	247	-	-	*ORI 024T3*
FR 0085	207	-	187	*FR 0085*
PBS 038	195	-	-	*PBS 038*
PBS 004	187	-	-	*PBS 004*
SR 021T3	146	-	-	*SR 021T3*
SR 018T5	99	-	-	*SR 018T5*
PBS 032	97	-	-	*PBS 032*
SR 020T3	5	-	-	*SR 020T3*
FR 0092	-	93.940	16.136	*FR 0092*
FR 0070	-	43.057	-	*FR 0070*
PBS 036	-	14.105	-	*PBS 036*
ORI 020	-	11.647	-	*ORI 020*
FR 0074	-	10.588	207	*FR 0074*
FR 0073	-	3.141	-	*FR 0073*
FR 0044	-	3.073	-	*FR 0044*
PBS 026	-	1.000	-	*PBS 026*
SR 0014	-	618	80	*SR 0014*
FR 0040	-	-	55.701	*FR 0040*
FR 0046	-	-	46.040	*FR 0046*

9. OBLIGASI PEMERINTAH (lanjutan) / *9. GOVERNMENT BONDS (continued)*

b. Berdasarkan mata uang dan jenis (lanjutan) / *b. Based on currency and type (continued)*

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Pihak berelasi (lanjutan)				*Related parties (continued)*
Nilai wajar melalui laba rugi (lanjutan)				*Fair value through profit or loss (continued)*
Rupiah				*Rupiah*
Tingkat bunga tetap				*Fixed interest rate*
FR 0080	-	-	41.472	*FR 0080*
ORI 018	-	-	40.110	*ORI 018*
ORI 019	-	-	2.087	*ORI 019*
SR 0015	-	-	191	*SR 0015*
ORI 017	-	-	70	*ORI 017*
SR 0012	-	-	50	*SR 0012*
	2.470.066	1.078.081	733.443	
Zero Coupon Bonds				*Zero Coupon Bonds*
SPN12250612	249.387	-	-	*SPN12250612*
SPN12250213	232.404	-	-	*SPN12250213*
SPN12250314	197.116	-	-	*SPN12250314*
SPNS01042025	76.506	-	-	*SPNS01042025*
SPNS03032025	37.057	-	3.334.531	*SPNS03032025*
SPN12250710	3.014	-	2.779.061	*SPN12250710*
SPN12240201	-	1.367.851	-	*SPN12240201*
SPN12240229	-	746.378	-	*SPN12240229*
SPN12240104	-	577.100	-	*SPN12240104*
SPN03240313	-	24.651	-	*SPN03240313*
SPN12230303	-	-	3.334.531	*SPN12230303*
SPN12230203	-	-	2.779.061	*SPN12230203*
SPN12230105	-	-	2.061.001	*SPN12230105*
SPN12230413	-	-	1.744.737	*SPN12230413*
SPN12230526	-	-	1.494.707	*SPN12230526*
SPN12230330	-	-	1.284.484	*SPN12230330*
SPN12230622	-	-	1.220.975	*SPN12230622*
SPN03230208	-	-	760.534	*SPN03230208*
SPN12230818	-	-	750.789	*SPN12230818*
SPN12230914	-	-	723.728	*SPN12230914*
SPN03230222	-	-	496.595	*SPN03230222*
SPNS02052023	-	-	473.497	*SPNS02052023*
SPNS07032023	-	-	421.154	*SPNS07032023*
SPN03230111	-	-	349.606	*SPN03230111*
SPNS10012023	-	-	299.754	*SPNS10012023*
SPN12231207	-	-	224.643	*SPN12231207*
SPN03230308	-	-	99.130	*SPN03230308*
SPN12230720	-	-	97.296	*SPN12230720*
SPN12231012	-	-	96.027	*SPN12231012*
SPN12231109	-	-	95.755	*SPN12231109*
SPNS07022023	-	-	49.752	*SPNS07022023*
Mata uang asing				*Foreign Currencies*
Dolar Amerika Serikat				*United States Dollar*
Tingkat bunga tetap				*Fixed interest rate*
INDOIS 2024	-	2.379	-	*INDOIS 2024*
INDOIS 2031	-	-	18.773	*INDOIS 2031*
INDON 2024N	-	-	609	*INDON 2024N*
	795.484	2.715.980	18.857.756	
	3.265.550	3.796.440	19.591.199	

9. OBLIGASI PEMERINTAH (lanjutan) / *9. GOVERNMENT BONDS (continued)*

b. Berdasarkan mata uang dan jenis (lanjutan) / *b. Based on currency and type (continued)*

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain				*Financial asset held at fair value through other comprehensive income*
Rupiah				*Rupiah*
Tingkat bunga tetap				*Fixed interest rate*
FR 0104	1.334.719	-	-	*FR 0104*
FR 0101	995.000	-	-	*FR 0101*
FR 0084	477.806	482.823	489.041	FR 0084
FR 0078	475.457	490.381	490.508	FR 0078
FR 0090	471.135	472.787	470.978	FR 0090
FR 0042	409.172	425.627	435.458	FR 0042
FR 0056	408.424	419.566	427.016	FR 0056
FR 0040	359.300	375.507	389.801	FR 0040
FR 0071	337.185	348.849	350.602	FR 0071
FR 0059	315.444	320.355	323.036	FR 0059
FR 0083	285.841	540.390	1.360.887	FR 0083
FR 0081	269.333	270.087	272.327	FR 0081
FR 0087	262.718	269.194	263.695	FR 0087
FR 0091	243.576	250.102	243.430	FR 0091
FR 0052	197.445	203.717	205.584	FR 0052
FR 0073	138.129	142.338	140.750	FR 0073
FR 0037	118.576	125.128	129.092	FR 0037
FR 0104	58.610	-	-	FR 0104
FR 0082	49.988	51.174	156.466	FR 0082
FR 0044	-	233.128	241.971	FR 0044
FR 0077	-	122.766	129.035	FR 0077
FR 0054	-	-	47.085	FR 0054
FR 0068	-	-	567.123	FR 0068
FR 0072	-	-	369.052	FR 0072
FR 0075	-	-	188.673	FR 0075
FR 0039	-	-	171.841	FR 0039
FR 0046	-	-	102.310	FR 0046
FR 0085	-	-	57.797	FR 0085
FR 0062	-	-	57.785	FR 0062
	7.207.858	5.543.919	8.081.343	
Obligasi Syariah Negara				*Government Sharia Bond*
PBSG 001	761.946	542.139	4.199	*PBSG 001*
PBS 003	338.649	338.469	191.598	*PBS 003*
PBS 017	300.431	303.279	308.382	*PBS 017*
PBS 030	275.784	276.560	273.796	*PBS 030*
PBS 037	251.292	250.434	-	*PBS 037*
PBS 032	195.692	193.968	194.051	*PBS 032*
PBS 033	154.044	156.676	32.921	*PBS 033*
PBS 038	146.166	99.621	-	*PBS 038*
PBS 025	104.978	106.808	105.392	*PBS 025*
PBS 029	104.544	102.918	101.669	*PBS 029*
PBS 039	96.721	-	-	*PBS 039*
PBS 022	78.108	78.965	79.275	*PBS 022*
PBS 028	73.533	73.878	71.208	*PBS 028*
PBS 021	67.848	68.795	71.851	*PBS 021*
PBS 012	58.389	59.863	59.124	*PBS 012*
PBS 004	52.478	46.542	45.960	*PBS 004*
PBS 034	34.291	34.736	32.610	*PBS 034*
PBS 026	-	253.450	254.920	*PBS 026*
PBS 027	-	-	479.969	*PBS 027*
PBS 019	-	-	104.917	*PBS 019*
PBS 011	-	-	8.209	*PBS 011*
	3.094.894	2.987.101	2.420.051	

9. OBLIGASI PEMERINTAH (lanjutan) / *9. GOVERNMENT BONDS (continued)*

b. Berdasarkan mata uang dan jenis (lanjutan) / *b. Based on currency and type (continued)*

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain (lanjutan)				*Financial asset held at fair value through other comprehensive income (continued)*
Mata uang asing				*Foreign Currencies*
Dolar Amerika Serikat				*United States Dollar*
Tingkat bunga tetap				*Fixed interest rate*
INDON 2047	783.459	825.805	775.119	*INDON 2047*
INDON 2046	553.707	579.496	544.954	*INDON 2046*
INDON 2038	535.027	545.560	516.227	*INDON 2038*
INDON 2044	397.239	413.980	383.132	*INDON 2044*
INDON 2043	362.810	383.217	361.545	*INDON 2043*
INDON 2045	321.061	338.525	365.197	*INDON 2045*
INDON 2048	203.841	215.720	203.418	*INDON 2048*
INDON 2049	163.524	171.050	158.781	*INDON 2049*
INDOIS 2050	126.907	134.838	127.609	*INDOIS 2050*
INDON 2049N	103.266	112.072	116.540	*INDON 2049N*
INDON 2037	100.996	102.953	127.775	*INDON 2037*
INDON 2050N	90.981	97.039	90.032	*INDON 2050N*
USDFR0002	63.479	60.716	61.226	*USDFR0002*
	3.806.297	3.980.971	3.831.555	
	14.109.049	12.511.991	14.332.949	
Diukur pada biaya perolehan amortisasi				*Amortized cost*
Rupiah				*Rupiah*
Tingkat bunga tetap				*Fixed interest rate*
FR 0081	1.447.513	1.452.798	1.457.898	*FR 0081*
FR 0084	1.191.608	1.212.730	1.231.951	*FR 0084*
FR 0086	1.140.181	1.138.797	1.137.564	*FR 0086*
FR 0056	1.104.558	1.126.953	1.048.174	*FR 0056*
FR 0059	920.386	923.741	442.347	*FR 0059*
FR 0064	899.798	900.859	835.184	*FR 0064*
FR 0047	762.223	784.201	804.972	*FR 0047*
FR 0085	402.311	403.858	405.264	*FR 0085*
FR 0078	332.756	336.975	340.917	*FR 0078*
FR 0087	265.051	263.786	262.628	*FR 0087*
FR 0040	260.671	272.759	284.041	*FR 0040*
FR 0082	238.852	238.723	238.580	*FR 0082*
FR 0054	147.551	149.411	151.148	*FR 0054*
FR 0071	131.938	134.592	137.061	*FR 0071*
FR 0073	129.591	130.747	131.814	*FR 0073*
FR 0090	97.334	96.277	95.292	*FR 0090*
FR 0088	75.587	75.251	74.948	*FR 0088*
FR 0037	71.337	74.779	78.003	*FR 0037*
FR 0091	47.869	47.656	47.456	*FR 0091*
FR 0065	46.931	46.676	46.442	*FR 0065*
FR 0052	40.365	41.116	41.811	*FR 0052*
FR 0042	16.132	16.524	16.889	*FR 0042*
FR 0070	-	431.886	440.831	*FR 0070*
FR 0044	-	288.687	300.342	*FR 0044*
FR 0077	-	101.037	103.718	*FR 0077*
FR 0046	-	-	41.273	*FR 0046*
FR 0039	-	-	14.565	*FR 0039*
	9.770.543	10.690.819	10.211.113	
Obligasi Syariah Negara				*Government Sharia Bond*
Sukuk BI	7.983.835	8.421.151	7.116.523	*Sukuk BI*
	17.754.378	19.111.970	17.327.636	
Mata uang asing				*Foreign Currencies*
Dolar Amerika Serikat				*United States Dollar*
Tingkat bunga tetap				*Fixed interest rate*
INDON 2026	249.690	246.600	257.113	*INDON 2026*
INDON 2025	96.862	95.492	99.348	*INDON 2025*
INDOIS 2024	-	100.642	102.380	*INDOIS 2024*
INDOIS 2024N	-	30.794	31.135	*INDOIS 2024N*
INDOIS 2023	-	-	128.695	*INDOIS 2023*

9. OBLIGASI PEMERINTAH (lanjutan) / *9. GOVERNMENT BONDS (continued)*

b. Berdasarkan mata uang dan jenis (lanjutan) / *b. Based on currency and type (continued)*

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Diukur pada biaya perolehan amortisasi (lanjutan)				*Amortized cost (continued)*
Mata uang asing				*Foreign Currencies*
Dolar Amerika Serikat				*United States Dollar*
Tingkat bunga tetap				*Fixed interest rate*
INDON 2023	-	-	62.816	*INDON 2023*
INDON 2023 N	-	-	31.702	*INDON 2023 N*
	346.552	473.528	713.189	
	18.100.930	19.585.498	18.040.825	
Total	**35.475.529**	**35.893.929**	**51.964.973**	***Total***

c. Berdasarkan jatuh tempo dan suku bunga / *c. Based on maturity and interest rate*

Keterangan	Tanggal jatuh tempo/ *Maturity date*	Suku Bunga/ *Interest Rate*	*Description*
Nilai wajar melalui laba rugi			*Fair value through profit or loss*
Rupiah			*Rupiah*
Tingkat bunga tetap			*Fixed interest rate*
FR 0044	15 September/ *September 15,* 2024	10,00% tetap/ *fixed*	*FR 0044*
FR 0056	15 September/ *September 15,* 2026	8,38% tetap/ *fixed*	*FR 0056*
FR 0059	15 Mei/ *May 15,* 2027	7,00% tetap/ *fixed*	*FR 0059*
FR 0062	15 April/ *April 15*, 2042	6,38% tetap/ *fixed*	*FR 0062*
FR 0064	15 Mei/ *May 15*, 2028	6,13% tetap/ *fixed*	*FR 0064*
FR 0065	15 Mei/ *May 15,* 2033	6,63% tetap/ *fixed*	*FR 0065*
FR 0068	15 Maret/ *March 15,* 2034	8,38% tetap/ *fixed*	*FR 0068*
FR 0070	15 Maret/ *March 15,* 2024	8,38% tetap/ *fixed*	*FR 0070*
FR 0071	15 Maret/ *March 15,* 2029	9,00% tetap/ *fixed*	*FR 0071*
FR 0072	15 Mei/ *May 15*, 2036	8,25% tetap/ *fixed*	*FR 0072*
FR 0073	15 Mei/ *May 15*, 2031	8,75% tetap/ *fixed*	*FR 0073*
FR 0075	15 Mei/ *May 15,* 2038	7,50% tetap/ *fixed*	*FR 0075*
FR 0076	15 Mei/ *May 15*, 2048	7,38% tetap/ *fixed*	*FR 0076*
FR 0078	15 Mei/ *May 15*, 2029	8,25% tetap/ *fixed*	*FR 0078*
FR 0079	15 April/ *April 15,* 2039	8,38% tetap/ *fixed*	*FR 0079*
FR 0081	15 Juni/ *June 15,* 2025	6,50% tetap/ *fixed*	*FR 0081*
FR 0082	15 September/ *September 15,* 2030	7,00% tetap/ *fixed*	*FR 0082*
FR 0083	15 April/ *April 15,* 2040	7,50% tetap/ *fixed*	*FR 0083*
FR 0084	15 Februari/ *February 15*, 2026	7,25% tetap/ *fixed*	*FR 0084*
FR 0085	15 April/ *April 15*, 2031	7,75% tetap/ *fixed*	*FR 0085*
FR 0086	15 April/ *April 15*, 2026	5,50% tetap/ *fixed*	*FR 0086*
FR 0087	15 Februari/ *February 15*, 2031	6,50% tetap/ *fixed*	*FR 0087*
FR 0088	15 Juni/ *June 15,* 2036	6,25% tetap/ *fixed*	*FR 0088*
FR 0089	15 Agustus/ *August 15,* 2051	6,88% tetap/ *fixed*	*FR 0089*
FR 0090	15 April/ *April 15,* 2027	5,13% tetap/ *fixed*	*FR 0090*
FR 0091	15 April/ *April 15,* 2032	6,38% tetap/ *fixed*	*FR 0091*

9. OBLIGASI PEMERINTAH (lanjutan)

9. GOVERNMENT BONDS (continued)

c. Berdasarkan jatuh tempo dan suku bunga (lanjutan)

c. Based on maturity and interest rate (continued)

Keterangan	Tanggal jatuh tempo/ *Maturity date*	Suku Bunga/ *Interest Rate*	*Description*
Nilai wajar melalui laba rugi			*Fair value through profit or loss*
Rupiah			*Rupiah*
Tingkat bunga tetap			*Fixed interest rate*
FR 0093	15 Juli/ *July 15,* 2037	6,38% tetap/ *fixed*	*FR 0093*
FR 0095	15 Agustus/ *August 15,* 2028	6,38% tetap/ *fixed*	*FR 0095*
FR 0096	15 Februari/ *February 15,* 2033	7,00% tetap/ *fixed*	*FR 0096*
FR 0097	15 Juni/ *June 15,* 2043	7,13% tetap/ *fixed*	*FR 0097*
FR 0098	15 Juni/ *June 15,* 2038	7,13% tetap/ *fixed*	*FR 0098*
FR 0100	15 Februari/ *February 15*, 2034	6,63% tetap/ *fixed*	*FR 0100*
FR 0101	15 April/ *April 15,* 2029	6,88% tetap/ *fixed*	*FR 0101*
FR 0102	15 Juli/ *July 15,* 2054	6,88% tetap/ *fixed*	*FR 0102*
FR 0103	15 Juli/ *July 15,* 2035	6,75% tetap/ *fixed*	*FR 0103*
FR 0104	15 Juli/ *July 15,* 2030	6,50% tetap/ *fixed*	*FR 0104*
ORI 021	15 Februari/ *February 15*, 2025	4,90% tetap/ *fixed*	*ORI 021*
ORI 022	15 Oktober/ *October 15*, 2025	5,95% tetap/ *fixed*	*ORI 022*
ORI 023T3	15 Juli/ *July 15,* 2026	5,90% tetap/ *fixed*	*ORI 023T3*
ORI 023T6	15 Juli/ *July 15,* 2029	6,10% tetap/ *fixed*	*ORI 023T6*
ORI 024T3	15 Oktober/ *October 15,* 2026	6,10% tetap/ *fixed*	*ORI 024T3*
ORI 024T6	15 Oktober/ *October 15,* 2029	6,35% tetap/ *fixed*	*ORI 024T6*
ORI 025T3	15 Februari/ *February 15,* 2027	6,25% tetap/ *fixed*	*ORI 025T3*
PBS 004	15 Februari/ *February 15*, 2037	6,10% tetap/ *fixed*	*PBS 004*
PBS 015	15 Juli/ *July 15*, 2047	8,00% tetap/ *fixed*	*PBS 015*
PBS 017	15 Oktober/ *October 15*, 2025	6,13% tetap/ *fixed*	*PBS 017*
PBS 032	15 Juli/ *July 15,* 2026	4,88% tetap/	*PBS 032*
PBS 033	15 Juni/ *June 15,* 2047	6,75% tetap/ *fixed*	*PBS 033*
PBS 037	15 Maret/ *March 15,* 2036	6,88% tetap/ *fixed*	*PBS 037*
PBS 038	15 Desember/ *December 15,* 2049	6,88% tetap/ *fixed*	*PBS 038*
SR 0014	10 Maret/ *March 10,* 2024	5,47% tetap/ *fixed*	*SR 0014*
SR 0016	10 Maret/ *March 10,* 2025	4,95% tetap/ *fixed*	*SR 0016*
SR 0017	10 September/ *September 10,* 2025	5,90% tetap/ *fixed*	*SR 0017*
SR 018T3	10 Maret/ *March 10,* 2026	6,25% tetap/ *fixed*	*SR 018T3*
SR 018T5	10 Maret/ *March 10,* 2028	6,40% tetap/ *fixed*	*SR 018T5*
SR 019T3	10 September/ *September 10,* 2026	5,95% tetap/ *fixed*	*SR 019T3*
SR 020T3	10 Maret/ *March 10,* 2027	6,30% tetap/ *fixed*	*SR 020T3*
SR 020T5	10 Maret/ *March 10,* 2029	6,40% tetap/ *fixed*	*SR 020T5*
SR 021T3	10 September/ *September 10,* 2027	6,35% tetap/ *fixed*	*SR 021T3*
	January 2, 2025	*fixed*	
Zero Coupon Bonds			*Zero Coupon Bonds*
SPN	Beragam/ *Various*	Beragam/ *Various*	*SPN*

9. OBLIGASI PEMERINTAH (lanjutan) / *9. GOVERNMENT BONDS (continued)*

c. Berdasarkan jatuh tempo dan suku bunga (lanjutan) / *c. Based on maturity and interest rate (continued)*

Keterangan	Tanggal jatuh tempo/ *Maturity date*	Suku Bunga/ *Interest Rate*	*Description*
Nilai wajar melalui laba rugi (lanjutan)			*Fair value through profit or loss (continued)*
Mata uang asing			*Foreign Currencies*
Dolar Amerika Serikat			*United States Dollar*
Tingkat bunga tetap			*Fixed interest rate*
INDOIS 2025	28 Mei/ *May 28,* 2025	4,32% tetap/ *fixed*	*INDOIS 2025*
INDOIS 2024	10 September/ *September 10,* 2024	4,35% tetap/ *fixed*	*INDOIS 2024*
Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain			*Financial asset held at fair value through other comprehensive income*
Rupiah			*Rupiah*
Tingkat bunga tetap			*Fixed interest rate*
FR 0037	15 September/ *September 15*, 2026	12,00% tetap/ *fixed*	*FR 0037*
FR 0040	15 September/ *September 15*, 2025	11,00% tetap/ *fixed*	*FR 0040*
FR 0042	15 Juli/ *July 15*, 2027	10,25% tetap/ *fixed*	*FR 0042*
FR 0044	15 September/ *September 15*, 2024	10,00% tetap/ *fixed*	*FR 0044*
FR 0052	15 Agustus/ *August 15*, 2030	10,50% tetap/ *fixed*	*FR 0052*
FR 0056	15 September/ *September 15*, 2026	8,38% tetap/ *fixed*	*FR 0056*
FR 0059	15 Mei/ *May 15*, 2027	7,00% tetap/ *fixed*	*FR 0059*
FR 0071	15 Maret/ *March 15*, 2029	9,00% tetap/ *fixed*	*FR 0071*
FR 0073	15 Mei/ *May 15*, 2031	8,75% tetap/ *fixed*	*FR 0073*
FR 0077	15 Mei/ *May 15*, 2024	8,13% tetap/ *fixed*	*FR 0077*
FR 0078	15 Mei/ *May 15*, 2029	8,25% tetap/ *fixed*	*FR 0078*
FR 0081	15 Juni/ *June 15*, 2025	6,50% tetap/ *fixed*	*FR 0081*
FR 0082	15 September/ *September 15*, 2030	7,00% tetap/ *fixed*	*FR 0082*
FR 0083	15 April/ *April 15*, 2040	7,50% tetap/ *fixed*	*FR 0083*
FR 0084	15 Februari/ *February 15*, 2026	7,25% tetap/ *fixed*	*FR 0084*
FR 0087	15 Februari/ *February 15*, 2031	6,50% tetap/ *fixed*	*FR 0087*
FR 0090	15 April/ *April 15*, 2027	5,13% tetap/ *fixed*	*FR 0090*
FR 0091	15 April/ *April 15*, 2032	6,38% tetap/ *fixed*	*FR 0091*
FR 0101	15 April/ *April 15*, 2029	6,88% tetap/ *fixed*	*FR 0101*
FR 0104	15 Juli/ *July 15*, 2030	6,50% tetap/ *fixed*	*FR 0104*

9. OBLIGASI PEMERINTAH (lanjutan)

c. Berdasarkan jatuh tempo dan suku bunga (lanjutan)

9. GOVERNMENT BONDS (continued)

c. Based on maturity and interest rate (continued)

Keterangan	Tanggal jatuh tempo/ *Maturity date*	Suku Bunga/ *Interest Rate*	*Description*
Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain (lanjutan)			*Financial asset held at fair value through other comprehensive income (continued)*
Rupiah (lanjutan)			*Rupiah (continued)*
Tingkat bunga tetap			*Fixed interest rate*
Obligasi Syariah Negara			*Government Sharia Bonds*
PBS 003	15 Januari/ *January 15*, 2027	6,00% tetap/ *fixed*	*PBS 003*
PBS 004	15 Februari/ *February 15*, 2037	6,10% tetap/ *fixed*	*PBS 004*
PBS 012	15 November/ *November 15*, 2031	8,88% tetap/ *fixed*	*PBS 012*
PBS 017	15 Oktober/ *October 15*, 2025	6,13% tetap/ *fixed*	*PBS 017*
PBS 021	15 November/ *November 15,* 2026	8,50% tetap/ *fixed*	*PBS 021*
PBS 022	15 April/ *April 15,* 2034	8,63% tetap/ *fixed*	*PBS 022*
PBS 025	15 Mei/ *May 15,* 2033	8,38% tetap/ *fixed*	*PBS 025*
PBS 028	15 Oktober/ *October 15,* 2046	7,75% tetap/ *fixed*	*PBS 028*
PBS 029	15 Maret/ *March 15,* 2034	6,38% tetap/ *fixed*	*PBS 029*
PBS 030	15 Juli/ *July 15*, 2028	5,88% tetap/ *fixed*	*PBS 030*
PBS 032	15 Juli/ *July 15,* 2026	4,88% tetap/ *fixed*	*PBS 032*
PBS 033	15 Juni/ *June 15,* 2047	6,75% tetap/ *fixed*	*PBS 033*
PBS 034	15 Juni/ *June 15,* 2039	6,50% tetap/ *fixed*	*PBS 034*
PBS 037	15 Maret/ *March 15,* 2036	6,88% tetap/ *fixed*	*PBS 037*
PBS 038	15 Desember/ *December 15,* 2049	6,88% tetap/ *fixed*	*PBS 038*
PBS 039	15 Juli/ *July 15,* 2041	6,63% tetap/ *fixed*	*PBS 039*
PBSG001	15 September/ *September 15,* 2029	6,63% tetap/ *fixed*	*PBSG001*
Mata uang asing			*Foreign Currencies*
Dolar Amerika Serikat			*United States Dollar*
Tingkat bunga tetap			*Fixed interest rate*
INDOIS 2050	23 Juni/ *June 23*, 2050	3,80% tetap/ *fixed*	*INDOIS 2050*
INDON 2037	17 Februari/ *February 17*, 2037	6,63% tetap/ *fixed*	*INDON 2037*
INDON 2038	17 Januari/ *January 17*, 2038	7,75% tetap/ *fixed*	*INDON 2038*
INDON 2043	15 April/ *April 15*, 2043	4,63% tetap/ *fixed*	*INDON 2043*
INDON 2044	15 Januari/ *January 15*, 2044	6,75% tetap/ *fixed*	*INDON 2044*
INDON 2045	15 Januari/ *January 15*, 2045	5,13% tetap/ *fixed*	*INDON 2045*
INDON 2046	8 Januari/ *January 8*, 2046	5,95% tetap/ *fixed*	*INDON 2046*
INDON 2047	8 Januari/ *January 8*, 2047	5,25% tetap/ *fixed*	*INDON 2047*
INDON 2048	11 Januari/ *January 11*, 2048	4,35% tetap/ *fixed*	*INDON 2048*
INDON 2049	11 Februari/ *February 11*, 2049	5,35% tetap/ *fixed*	*INDON 2049*
INDON 2049N	30 Oktober/ *October 30*, 2049	3,70% tetap/ *fixed*	*INDON 2049N*
INDON 2050N	15 Oktober/ *October 15*, 2050	4,20% tetap/ *fixed*	*INDON 2050N*
USD FR 0002	24 Juni/ *June 24*, 2026	4,05% tetap/ *fixed*	*USD FR 0002*

9. OBLIGASI PEMERINTAH (lanjutan)

c. Berdasarkan jatuh tempo dan suku bunga (lanjutan)

9. GOVERNMENT BONDS (continued)

c. Based on maturity and interest rate (continued)

Keterangan	Tanggal jatuh tempo/ *Maturity date*	Suku Bunga/ *Interest Rate*	*Description*
Diukur pada biaya perolehan amortisasi			*Amortized cost*
Rupiah			*Rupiah*
Tingkat bunga tetap			*Fixed interest rate*
FR 0037	15 September/ *September 15,* 2026	12,00% tetap/ *fixed*	*FR 0037*
FR 0040	15 September/ *September 15*, 2025	11,00% tetap/ *fixed*	*FR 0040*
FR 0042	15 Juli/ *July 15,* 2027	10,25% tetap/ *fixed*	*FR 0042*
FR 0044	15 September/ *September 15*, 2024	10,00% tetap/ *fixed*	*FR 0044*
FR 0047	15 Februari/ *February 15*, 2028	10,00% tetap/ *fixed*	*FR 0047*
FR 0052	15 Agustus/ *August 15*, 2030	10,50% tetap/ *fixed*	*FR 0052*
FR 0054	15 Juli/ *July 15*, 2031	9,50% tetap/ *fixed*	*FR 0054*
FR 0056	15 September/ *September 15,* 2026	8,38% tetap/ *fixed*	*FR 0056*
FR 0059	15 Mei/ *May 15*, 2027	7,00% tetap/ *fixed*	*FR 0059*
FR 0064	15 Mei/ *May 15*, 2028	6,13% tetap/ *fixed*	*FR 0064*
FR 0065	15 Mei/ *May 15,* 2033	6,63% tetap/ *fixed*	*FR 0065*
FR 0070	15 Maret/ *March 15*, 2024	8,38% tetap/ *fixed*	*FR 0070*
FR 0071	15 Maret/ *March 15*, 2029	9,00% tetap/ *fixed*	*FR 0071*
FR 0073	15 Mei/ *May 15*, 2031	8,75% tetap/ *fixed*	*FR 0073*
FR 0077	15 Mei/ *May 15*, 2024	8,13% tetap/ *fixed*	*FR 0077*
FR 0078	15 Mei/ *May 15*, 2029	8,25% tetap/ *fixed*	*FR 0078*
FR 0081	15 Juni/ *June 15*, 2025	6,50% tetap/ *fixed*	*FR 0081*
FR 0082	15 September/ *September 15*, 2030	7,00% tetap/ *fixed*	*FR 0082*
FR 0084	15 Februari/ *February 15*, 2026	7,25% tetap/ *fixed*	*FR 0084*
FR 0085	15 April/ *April 15*, 2031	7,75% tetap/ *fixed*	*FR 0085*
FR 0086	15 April/ *April 15*, 2026	5,50% tetap/ *fixed*	*FR 0086*
FR 0087	15 Februari/ *February 15*, 2031	6,50% tetap/ *fixed*	*FR 0087*
FR 0088	15 Juni/ *June 15,* 2036	6,25% tetap/ *fixed*	*FR 0088*
FR 0090	15 April/ *April 15*, 2027	5,13% tetap/ *fixed*	*FR 0090*
FR 0091	15 April/ *April 15,* 2032	6,38% tetap/ *fixed*	*FR 0091*
FR 0104	7 Januari/ *January 7,* 2025	6,35% tetap/ *fixed*	*FR 0104*
Obligasi Syariah Negara			*Government Sharia Bond*
Sukuk BI	3 Januari/ *January 3,* 2025	6,89% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	3 Januari/ *January 3,* 2025	6,83% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	3 Januari/ *January 3,* 2025	7,32% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	3 Januari/ *January 3,* 2025	6,00% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	6 Januari/ *January 6,* 2025	6,00% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	22 Januari/ *January 22,* 2025	6,57% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	31 Januari/ *January 31,* 2025	6,82% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	31 Januari/ *January 31,* 2025	7,32% tetap/ *fixed*	*Sukuk BI*

9. OBLIGASI PEMERINTAH (lanjutan)

c. Berdasarkan jatuh tempo dan suku bunga (lanjutan)

9. GOVERNMENT BONDS (continued)

c. Based on maturity and interest rate (continued)

Keterangan	Tanggal jatuh tempo/ *Maturity date*	Suku Bunga/ *Interest Rate*	*Description*
Diukur pada biaya perolehan amortisasi (lanjutan)			*Amortized cost (continued)*
Rupiah (lanjutan)			*Rupiah (continued)*
Tingkat bunga tetap			*Fixed interest rate*
Obligasi Syariah Negara (lanjutan)			*Government Sharia Bond (continued)*
Sukuk BI	31 Januari/ *January 31,* 2025	7,09% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	26 Februari/ *February 26*, 2025	6,70% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	7 Maret/ *March 7,* 2025	6,86% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	7 Maret/ *March 7,* 2025	7,33% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	7 Maret/ *March 7,* 2025	7,02% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	25 Maret/ *March 25,* 2025	6,72% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	4 April/ *April 4,* 2025	6,92% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	4 April/ *April 4,* 2025	7,43% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	4 April/ *April 4,* 2025	6,69% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	2 Mei/ *May 2,* 2025	7,47% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	2 Mei/ *May 2,* 2025	7,18% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	2 Mei/ *May 2,* 2025	6,78% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	6 Juni/ *June 6,* 2025	7,38% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	6 Juni/ *June 6,* 2025	7,11% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	10 Juni/ *June 10,* 2025	7,12% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	4 Juli/ *July 4,* 2025	7,52% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	4 Juli/ *July 4,* 2025	6,78% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	1 Agustus/ *August 1,* 2025	7,24% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	1 Agustus/ *August 1,* 2025	6,85% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	8 September/ *September 8,* 2025	7,15% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	3 Oktober/ *October 3,* 2025	6,82% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	31 Oktober/ *October 31,* 2025	7,05% tetap/ *fixed*	*Sukuk BI*
Sukuk BI	5 Desember/ *December 5,* 2025	7,23% tetap/ *fixed*	*Sukuk BI*
Dolar Amerika Serikat			*United States Dollar*
Tingkat bunga tetap			*Fixed interest rate*
INDON 2025	15 Januari/ *January 15*, 2025	4,13% tetap/ *fixed*	*INDON 2025*
INDON 2026	8 Januari/ *January 8*, 2026	4,75% tetap/ *fixed*	*INDON 2026*

9. OBLIGASI PEMERINTAH (lanjutan)

c. Berdasarkan jatuh tempo dan suku bunga (lanjutan)

Bunga atas obligasi pemerintah syariah untuk seri ORI, PBS dan seri SR, masing-masing dibayarkan secara bulanan dan semester.

Nilai pasar obligasi pemerintah yang diklasifikasikan sebagai nilai wajar melalui laba rugi dan diukur pada nilai wajar melalui penghasilan komprehensif lain berkisar dari 93,40% sampai dengan 158,29%, 83,40% sampai dengan 128,61% dan 77,42% sampai dengan 120,93% masing-masing pada tanggal 31 Desember 2024, 2023 dan 2022.

Kerugian yang belum direalisasi akibat penurunan nilai wajar obligasi pemerintah yang diukur pada nilai wajar melalui pendapatan komprehensif lain pada tanggal 31 Desember 2024, 2023 dan 2022 masing-masing sebesar (Rp1.185.533), (Rp836.907) dan (Rp1.229.044), yang disajikan dalam akun "(Kerugian) yang belum direalisasi atas efek-efek dan obligasi pemerintah setelah pajak tangguhan" pada ekuitas dalam laporan posisi keuangan.

Bank mengakui keuntungan dan kerugian bersih atas penjualan obligasi pemerintah masing-masing sebesar Rp49.049, Rp541.392 dan (Rp266.235), untuk tahun yang berakhir pada tanggal 31 Desember 2024, 2023 dan 2022, yang disajikan dalam akun "Keuntungan dan (kerugian) dari penjualan obligasi pemerintah - neto" di laporan laba rugi dan penghasilan komprehensif lain.

Bank mengakui keuntungan dan kerugian yang belum direalisasi-neto atas perubahan nilai wajar obligasi pemerintah melalui laba rugi sebesar (Rp40.444), (Rp5.780) dan Rp55.045 masing-masing untuk tahun yang berakhir pada tanggal 31 Desember 2024, 2023 dan 2022, yang disajikan dalam akun "Keuntungan (kerugian) yang belum direalisasi dari perubahan nilai wajar obligasi pemerintah - neto" di laporan laba rugi dan penghasilan komprehensif lain.

9. GOVERNMENT BONDS (continued)

c. Based on maturity and interest rate (continued)

Interest of ORI series, PBS and SR series sharia government bonds are paid monthly and semi-annually, respectively.

The market values of government bonds classified as fair value through profit or loss and fair value through other comprehensive income are ranging from 93.40% to 158.29%, 83.40% to 128.61% and 77.42% to 120.93% of nominal amounts as of December 31, 2024, 2023 and 2022, respectively.

As of December 31, 2024, 2023 and 2022, the unrealized gain or loss due to the decrease in the fair value of fair value through other comprehensive income government bonds (after deferred tax) amounted to (Rp1.185.533), (Rp836,907) and (Rp1,229,044), respectively, which are presented as "Unrealized (loss) on securities and government bonds, net of deferred tax" in the equity section of the statement of financial position.

The Bank recognized gain and loss-net on sale of government bonds amounting to Rp49,049, Rp541,392 and (Rp266,235) for the years ended December 31, 2024, 2023 and 2022, respectively, which is presented in the statement of profit or loss and other comprehensive income as "Gain and (loss) on sale of government bonds - net".

The Bank recognized unrealized gain and loss-net from the change in fair value of government bonds classified as at fair value through profit or loss amounting to (Rp40,444), (Rp5,780) and Rp55,045 for the years ended December 31, 2024, 2023 and 2022, respectively, which is presented in the statement of profit and loss in other comprehensive income as "Unrealized gain and loss from change in fair value of government bonds - net".

10. EFEK-EFEK YANG DIBELI DENGAN JANJI DIJUAL KEMBALI

Efek-efek yang dibeli dengan janji dijual kembali terdiri dari:

10. SECURITIES PURCHASED UNDER AGREEMENT TO RESELL

Securities purchased under agreement to resell consist of:

31 Desember/*December 31*, 2024

Nasabah/ *Customer*	Jenis Surat Berharga/ *Type of Securities*	Suku Bunga/ *Interest rate*	Nilai Nominal/ *Nominal Amount*	Tanggal Dimulai/ *Commencement Date*	Tanggal Penjualan Kembali/ *Resell Date*	Harga Penjualan Kembali/ *Resell Price*	Pendapatan Bunga yang Belum Direalisasi/ *Unrealized Interest*	Nilai Tercatat/ *Carrying Value*
Pihak Ketiga/*Third Party*								
Bank Pembangunan Daerah Kalimantan Tengah	IDSR240125364S	6,46%	50.000	17 Desember/ *December 17*, 2024	2 Januari/ *January 2*, 2025	49.785	9	49.776
Nationalnobu Bank	IDSR051225364S	6,30%	50.000	24 Desember/ *December 24*, 2024	7 Januari/ *January 7*, 2025	46.868	50	46.818
Bank Pembangunan Daerah Kalimantan Tengah	IDSR101025364S	6,46%	33.000	18 Desember/ *December 18*, 2024	3 Januari/ *January 3*, 2025	31.334	11	31.323
Standard Chartered Bank	IDSR040425364S	6,30%	10.000	23 Desember/ *December 23*, 2024	6 Januari/ *January 6*, 2025	9.832	9	9.823
Standard Chartered Bank	IDSR040425364	6,30%	10.000	19 Desember/ *December 19*, 2024	2 Januari/ *January 2*, 2025	9.825	2	9.823
Bank Pembangunan Daerah Jawa Barat Dan Banten Tbk	FR0087	6,46%	10.000	20 Desember/ *December 20*, 2024	3 Januari/ *January 3*, 2025	9.205	3	9.202
Bank Pembangunan Daerah Jawa Barat Dan Banten Tbk	FR0087	6,46%	10.000	27 Desember/ *December 27*, 2024	10 Januari/ *January 10*, 2025	9.211	15	9.196
Standard Chartered Bank	IDSR040425364	6,30%	5.000	30 Desember/ *December 30*, 2024	13 Januari/ *January 13*, 2025	4.923	11	4.912
Bank Pembangunan Daerah Jawa Barat Dan Banten Tbk	FR0096	6,46%	5.000	31 Desember/ *December 31*, 2024	14 Januari/ *January 14*, 2025	4.763	11	4.752
Total			**183.000**			**175.746**	**121**	**175.625**

31 Desember/*December 31*, 2022

Nasabah/ *Customer*	Jenis surat berharga/ *Type of securities*	Suku bunga/ *Interest rate*	Nilai nominal/ *Nominal amount*	Tanggal dimulai/ *commencement date*	Tanggal penjualan kembali/ *Resell date*	Harga Penjualan kembali/ *Resell price*	Pendapatan Bunga yang Belum Direalisasi/ *Unrealized interest*	Nilai tercatat/ *Carrying Value*
Pihak Ketiga/*Third Party*								
Bank Indonesia	VR0035	5,50%	1.000.000	30 Desember/ *December 30*, 2022	6 Januari/ *January 6*, 2023	957.562	731	956.831
Bank Indonesia	VR0039	5,50%	500.000	30 Desember/ *December 30*, 2022	6 Januari/ *January 6*, 2023	477.724	365	477.359
			1.500.000			**1.435.286**	**1.096**	**1.434.190**

Berikut adalah perubahan efek-efek yang dibeli dengan janji dijual kembali untuk tahun yang berakhir 31 Desember 2024, 2023 dan 2022:

Presented below is the movements in securities purchased under agreement to resell for the year ended December 31, 2024, 2023 and 2022, respectively:

31 Desember/*December 31*, 2024

	Stage 1	Stage 2	Stage 3	Syariah*)	Total	
Efek-efek yang dibeli dengan janji dijual kembali						***Securities purchased under agreement to resell***
Saldo awal	-	-	-	-	-	*Beginning Balance*
Aset keuangan baru yang diterbitkan atau dibeli	175.625	-	-	-	175.625	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	-		-	-	-	*Derecognized financial assets*
Saldo akhir tahun	**175.625**	**-**	**-**	**-**	**175.625**	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109 "Instrumen Keuangan"

**) Not applying SFAS No. 109 "Financial Instruments"*

10. EFEK-EFEK YANG DIBELI DENGAN JANJI DIJUAL KEMBALI (lanjutan)

Berikut adalah perubahan efek-efek yang dibeli dengan janji dijual kembali untuk tahun yang berakhir 31 Desember 2024, 2023 dan 2022:

10. SECURITIES PURCHASED UNDER AGREEMENT TO RESELL (continued)

Presented below is the movements in securities purchased under agreement to resell for the year ended December 31, 2024, 2023 and 2022, respectively:

	31 Desember/*December 31*, 2023					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
Efek-efek yang dibeli dengan janji dijual kembali						***Securities purchased under agreement to resell***
Saldo awal	1.434.190	-	-	-	1.434.190	*Beginning Balance*
Aset keuangan baru yang diterbitkan atau dibeli	-	-	-	-	-	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(1.434.190)	-	-	-	(1.434.190)	*Derecognized financial assets*
Saldo akhir tahun	**-**	**-**	**-**	**-**	**-**	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109 "Instrumen Keuangan"

**) Not applying SFAS No. 109 "Financial Instruments"*

	31 Desember/*December 31*, 2022					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
Efek-efek yang dibeli dengan janji dijual kembali						***Securities purchased under agreement to resell***
Saldo awal	1.598.325	-	-	-	1.598.325	*Beginning Balance*
Aset keuangan baru yang diterbitkan atau dibeli	1.434.190	-	-	-	1.434.190	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(1.598.325)	-	-	-	(1.598.325)	*Derecognized financial assets*
Saldo akhir tahun	**1.434.190**	**-**	**-**	**-**	**1.434.190**	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109 "Instrumen Keuangan"

**) Not applying SFAS No. 109 "Financial Instruments"*

11. KREDIT YANG DIBERIKAN DAN PEMBIAYAAN/ PIUTANG SYARIAH

Seluruh kredit yang diberikan oleh Bank, termasuk pembiayaan/piutang syariah adalah dalam Rupiah. Rincian kredit dan pembiayaan/piutang syariah yang diberikan oleh Bank berdasarkan jenis, transaksi dengan pihak-pihak berelasi, sektor ekonomi, jangka waktu sesuai dengan perjanjian, sisa umur jatuh tempo dan kolektibilitas adalah sebagai berikut:

11. LOANS AND SHARIA FINANCING/ RECEIVABLES

All loans provided by the Bank, including sharia financing/receivables are in Rupiah. The details of loans and sharia financing/receivables classified by type, transactions with related parties, economic sector, period based on agreements, remaining period to maturity and collectibility are as follows:

a. Jenis Kredit dan Pembiayaan/Piutang Syariah

a. Types of Loans and Sharia Financing/Receivables

	31 Desember/ *December 31*, 2024	**31 Desember/ *December 31*, 2023**	**31 Desember/ *December 31*, 2022**	
Konvensional				*Conventional*
Konsumsi				*Consumer*
Pemilikan rumah (KPR)	239.067.180	223.468.118	204.856.626	*Housing loan*
Non-kepemilikan rumah	14.243.360	12.840.107	11.546.141	*Non-housing loan*
	253.310.540	236.308.225	216.402.767	
Modal kerja	34.063.699	35.696.992	32.155.119	*Working capital*
Investasi	17.120.907	15.453.971	11.501.050	*Investment*
Sindikasi	7.785.728	7.150.361	4.504.244	*Syndicated*
Direksi dan karyawan				*Directors and employees*
- Pihak ketiga	1.739.208	1.893.632	2.008.080	*Third parties -*
- Pihak yang berelasi	60.023	80.679	86.305	*Related parties -*
	314.080.105	296.583.860	266.657.565	

11. KREDIT YANG DIBERIKAN DAN PEMBIAYAAN/ PIUTANG SYARIAH (lanjutan)

11. LOANS AND SHARIA FINANCING/ RECEIVABLES (continued)

a. Jenis Kredit dan Pembiayaan/Piutang Syariah (lanjutan)

a. Types of Loans and Sharia Financing/Receivables (continued)

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Syariah				*Sharia*
Konsumsi				*Consumer*
Pemilikan rumah (KPR)	40.863.836	34.602.763	29.030.428	*Housing loan*
Non-kepemilikan rumah	280.853	166.474	143.517	*Non-housing loan*
	41.144.689	34.769.237	29.173.945	
Modal kerja	2.464.181	2.263.137	2.300.564	*Working capital*
Investasi	72.475	78.036	142.572	*Investment*
Direksi dan karyawan				*Directors and employees*
- Pihak yang berelasi	211.482	3.871	7.058	*Related parties -*
	43.892.827	37.114.281	31.624.139	
Total	357.972.932	333.698.141	298.281.704	*Total*
Dikurangi cadangan kerugian penurunan nilai	(13.057.187)	(15.591.964)	(15.674.923)	*Less allowance for impairment losses*
Neto	**344.915.745**	**318.106.177**	**282.606.781**	***Net***

b. Sektor Ekonomi

b. Economic Sector

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Konvensional				*Conventional*
Perumahan	263.792.957	251.091.492	233.309.666	*Property*
Konstruksi	13.957.153	12.078.073	13.089.795	*Construction*
Jasa usaha	10.705.016	10.226.514	7.260.835	*Business service*
Listrik. gas dan air	5.665.747	5.106.305	3.368.130	*Electricity. gas and water*
Perdagangan. restoran. dan hotel	5.180.920	4.117.417	1.410.821	*Trading. restaurant and hotel*
Transportasi, pergudangan, dan komunikasi	5.030.174	4.830.547	4.414.947	*Transportation, Warehousing, and communication*
Manufaktur	2.350.749	1.604.572	1.058.915	*Manufacturing*
Pertambangan	1.672.093	1.842.962	1.228.096	*Mining*
Jasa-jasa sosial	743.868	1.542.949	1.148.943	*Social service*
Pertanian	144.363	177.819	52.234	*Farming*
Lain-lain*)	4.837.065	3.965.210	315.183	*Other*)
	314.080.105	296.583.860	266.657.565	
Syariah				*Sharia*
Perumahan	40.866.066	34.604.291	29.035.910	*Property*
Konstruksi	1.886.725	1.597.691	1.466.466	*Construction*
Jasa usaha	1.140.036	912.299	1.121.763	*Business service*
	43.892.827	37.114.281	31.624.139	
Total	357.972.932	333.698.141	298.281.704	*Total*
Dikurangi cadangan kerugian penurunan nilai	(13.057.187)	(15.591.964)	(15.674.923)	*Less allowance for impairment losses*
Neto	**344.915.745**	**318.106.177**	**282.606.781**	***Net***

*) Terdiri dari rumah tangga dan sektor ekonomi lainnya

**) Consists of household and other economic sectors*

11. KREDIT YANG DIBERIKAN DAN PEMBIAYAAN/ PIUTANG SYARIAH (lanjutan)

11. LOANS AND SHARIA FINANCING/ RECEIVABLES (continued)

c. Transaksi dengan pihak-pihak berelasi

c. Transactions with related parties

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Konvensional				*Conventional*
Konsumsi				*Consumer*
Pemilikan rumah (KPR)	1.811	4.176	4.538	*Housing Loan*
Non-kepemilikan rumah	70.076	85.559	91.185	*Non-housing loan*
	71.887	89.735	95.723	
Modal Kerja	11.582.140	12.066.600	8.884.001	*Working capital*
Investasi	10.083.466	9.340.394	6.728.046	*Investment*
Sindikasi	6.198.506	6.188.754	3.731.972	*Syndicated*
	27.935.999	27.685.483	19.439.742	
Syariah				*Sharia*
Konsumsi				*Consumer*
Pemilikan rumah (KPR)	2.229	1.529	5.483	*Housing Loan*
Non-kepemilikan rumah	9.253	2.342	1.575	*Non-housing loan*
	11.482	3.871	7058	
Modal Kerja	200.000	83.332	249.999	*Working capital*
	211.482	87.203	257.057	
Total	**28.147.481**	**27.772.686**	**19.696.799**	***Total***

d. Jangka waktu (sesuai dengan perjanjian kredit dan pembiayaan/piutang syariah)

d. Loan period (based on agreements covering loan and sharia financing/receivables)

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Konvensional				*Conventional*
≤ 1 tahun	1.834.798	2.889.936	2.871.853	*≤ 1 year*
> 1 tahun ≤ 2 tahun	4.539.869	4.026.448	1.945.142	*> 1 year ≤ 2 years*
> 2 tahun ≤ 5 tahun	17.542.693	15.988.179	11.756.496	*> 2 years ≤ 5 years*
> 5 tahun	290.162.745	273.679.297	250.084.074	*> 5 years*
	314.080.105	296.583.860	266.657.565	
Syariah				*Sharia*
≤ 1 tahun	100.035	146.877	114.641	*≤ 1 year*
> 1 tahun ≤ 2 tahun	681.543	631.048	413.397	*> 1 year ≤ 2 years*
> 2 tahun ≤ 5 tahun	1.963.533	1.486.054	1.624.779	*> 2 years ≤ 5 years*
> 5 tahun	41.147.716	34.850.302	29.471.322	*> 5 years*
	43.892.827	37.114.281	31.624.139	
Total	357.972.932	333.698.141	298.281.704	*Total*
Dikurangi cadangan kerugian penurunan nilai	(13.057.187)	(15.591.964)	(15.674.923)	*Less allowance for impairment losses*
Neto	**344.915.745**	**318.106.177**	**282.606.781**	***Net***

11. KREDIT YANG DIBERIKAN DAN PEMBIAYAAN/ PIUTANG SYARIAH (lanjutan)

11. LOANS AND SHARIA FINANCING/ RECEIVABLES (continued)

e. Sisa Umur Jatuh Tempo

e. Remaining Period to Maturity

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Konvensional				*Conventional*
≤ 1 tahun	16.129.318	14.044.527	15.001.990	*≤ 1 year*
> 1 tahun ≤ 2 tahun	6.200.166	8.528.139	6.996.578	*> 1 year ≤ 2 years*
> 2 tahun ≤ 5 tahun	29.855.225	29.474.735	25.171.528	*> 2 years ≤ 5 years*
> 5 tahun	261.895.396	244.536.459	219.487.469	*> 5 years*
	314.080.105	296.583.860	266.657.565	
Syariah				*Sharia*
≤ 1 tahun	1.488.421	861.160	1.033.295	*≤ 1 year*
> 1 tahun ≤ 2 tahun	1.183.565	858.624	979.616	*> 1 year ≤ 2 years*
> 2 tahun ≤ 5 tahun	2.751.754	2.325.080	1.831.707	*> 2 years ≤ 5 years*
> 5 tahun	38.469.087	33.069.417	27.779.521	*> 5 years*
	43.892.827	37.114.281	31.624.139	
Total	357.972.932	333.698.141	298.281.704	*Total*
Dikurangi cadangan kerugian penurunan nilai	(13.057.187)	(15.591.964)	(15.674.923)	*Less allowance for impairment losses*
Neto	**344.915.745**	**318.106.177**	**282.606.781**	***Net***

f. Informasi pokok lainnya

f. Other significant information

i. Termasuk di dalam kredit yang diberikan adalah pembiayaan/piutang syariah yang diberikan dengan rincian sebagai berikut:

i. Loans include sharia financing/ receivables with details, as follows:

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Piutang *Murabahah*	32.568.565	28.605.876	23.810.202	*Murabahah receivables*
Pembiayaan *Musyarakah*	6.014.023	4.527.313	4.563.573	*Musyarakah financing*
Piutang *Istishna*	5.263.020	3.861.013	2.955.715	*Istishna receivables*
Pembiayaan *Mudharabah*	16.790	102.689	284.162	*Mudharabah financing*
Pinjaman *Qardh*	20.904	15.940	10.487	*Funds of Qardh*
Aset yang Diperoleh Untuk *Ijarah – Bersih*	9.525	1.450	-	*Assets Acquired for Ijarah - Net*
Total	43.892.827	37.114.281	31.624.139	*Total*
Dikurangi cadangan kerugian penurunan nilai	(1.329.253)	(1.400.428)	(1.570.009)	*Less allowance for impairment losses*
Neto	**42.563.574**	**35.713.853**	**30.054.130**	***Net***

11. KREDIT YANG DIBERIKAN DAN PEMBIAYAAN/ PIUTANG SYARIAH (lanjutan)

f. Informasi pokok lainnya (lanjutan)

ii. Tingkat suku bunga rata-rata per tahun untuk kredit konsumer sebesar 7,68%, 9,66% dan 10,41% masing-masing untuk tahun yang berakhir pada tanggal 31 Desember 2024, 2023 dan 2022. Tingkat suku bunga rata-rata per tahun untuk kredit komersial masing-masing sebesar 6,30%, 6,26% dan 6,54% masing-masing untuk tahun yang berakhir pada tanggal 31 Desember 2024, 2023 dan 2022.

iii. Kredit yang diberikan dijamin dengan hak tanggungan atau surat kuasa memasang hak tanggungan atau surat kuasa untuk menjual, giro, tabungan, deposito berjangka atau jaminan lain yang umumnya diterima oleh Bank (Catatan 18, 19 dan 20).

iv. Bank telah menjual dan mengalihkan Kredit Pemilikan Rumah (KPR) yang dimilikinya kepada penerbit PT Sarana Multigriya Finansial (Persero) yang tertuang dalam Akta Jual Beli No. 48 tanggal 26 Oktober 2022 dan Akta Cessie No. 36 tanggal 23 Desember 2022.

Nilai KPR yang dijual tersebut adalah sebesar Rp373.064 yang terdiri dari 5.475 debitur dengan harga jual sebesar nilai pokok KPR pada tanggal *cut-off* final (2 Oktober 2022). Penjualan ini memenuhi kriteria penjualan putus karena risiko dan manfaat atas kepemilikan KPR secara signifikan telah dialihkan kepada pembeli.

v. Bank telah menjual dan mengalihkan Kredit Pemilikan Rumah (KPR) yang dimilikinya kepada penerbit PT Sarana Multigriya Finansial (Persero) yang tertuang dalam Akta Jual Beli No. 33 tanggal 28 Juli 2023 dan Akta Cessie No. 28 tanggal 26 September 2023.

Nilai KPR yang dijual tersebut adalah sebesar Rp599.359 yang terdiri dari 4.330 debitur dengan harga jual sebesar nilai pokok KPR pada tanggal *cut-off* final (4 Juli 2023). Penjualan ini memenuhi kriteria penjualan putus karena risiko dan manfaat atas kepemilikan KPR secara signifikan telah dialihkan kepada pembeli.

11. LOANS AND SHARIA FINANCING /RECEIVABLES (continued)

f. Other significant information (continued)

ii. Average annual interest rates for consumer loans are 7.68%, 9.66% and 10.41% for the years ended December 31, 2024, 2023 and 2022, respectively. Average annual interest rates for commercial loans are 6.30%, 6.26% and 6.54% for the years ended December 31, 2024, 2023 and 2022, respectively.

iii. The loans are collateralized by registered mortgages or by powers of attorney to mortgage or sell, demand deposits, savings deposits, time deposits, or by other collaterals generally acceptable by the Bank (Notes 18, 19 and 20).

iv. The Bank has sold and transferred its housing loans (KPR) to PT Sarana Multigriya Finansial (Persero) based on sale-purchase deed No. 48 dated October 26, 2022 and Deed of Cessie No. 36 dated December 23, 2022.

The principal amount of KPR sold amounted to Rp373,064 which consists of 5,475 debtors with selling price at the principal amount of KPR as of final cut off date (October 2, 2022). This sale qualified for derecognition as the risks and rewards of ownership over the KPR have been substantially transferred to the buyer.

v. The Bank has sold and transferred its housing loans (KPR) to PT Sarana Multigriya Finansial (Persero) based on sale-purchase deed No. 33 dated July 28, 2023 and Deed of Cessie No. 28 dated September 26, 2023.

The principal amount of KPR sold amounted to Rp599,359 which consists of 4,330 debtors with selling price at the principal amount of KPR as of final cut off date (July 4, 2023). This sale qualified for derecognition as the risks and rewards of ownership over the KPR have been substantially transferred to the buyer.

11. KREDIT YANG DIBERIKAN DAN PEMBIAYAAN/ PIUTANG SYARIAH (lanjutan)

f. Informasi pokok lainnya (lanjutan)

vi. Pada tanggal 30 Desember 2024, Bank menjual kredit yang diberikan tertentu kepada PT AMC Dharma Jaya (“AMC”) sejumlah Rp1.309.117 dimana nilai tercatat bruto atas pokok adalah Rp1.308.723 dan tagihan bunga adalah Rp394. Bank sebelumnya telah membentuk cadangan kerugian penurunan nilai secara penuh sehingga nilai tercatatnya adalah Rpnihil. Penjualan kredit yang diberikan ini dilakukan melalui akta jual beli dan cessie tertanggal 30 Desember 2024 dan sejak tanggal tersebut Bank menghentikan pengakuan kredit tersebut. Sesuai dengan ketentuan dalam akta jual beli dan cessie tersebut, Bank telah mengalihkan seluruh hak atas arus kas dan juga mengalihkan seluruh risiko dan manfaat atas kredit yang diberikan yang dijual tersebut. Oleh karena itu, Bank menghentikan pengakuan atas kredit yang diberikan ini dan mengakui pemulihan seluruh cadangan kerugian penurunan nilai yang dibentuk sebelumnya.

Pada tanggal yang sama, Bank membeli surat berharga syariah yaitu Sukuk Wakalah BI Al-Istitsmar (“Sukuk”) yang diterbitkan oleh PT Aviasi Pariwisata Indonesia (Persero) dari Subsidiary of Enterprise (“SOE”) Dharmawangsa Fund dengan nilai sebesar Rp3.224.017 Sukuk ini telah dicatat pada nilai wajarnya sebesar Rp2.049.646 pada tanggal pembelian (lihat Catatan 8 (Efek-Efek). SOE Dharmawangsa Fund merupakan sub fund dari Namco Indonesia Raya VCC yang dikelola oleh Mandiri Investment Management Pte. Ltd. selaku manajer investasi. Pemegang mayoritas saham AMC adalah Bidara Pte. Ltd. dengan kepemilikan sebesar 99,9%, dimana pemegang saham tunggal Bidara Pte. Ltd. adalah Henry Shaw merupakan Direktur Namco Indonesia Raya VCC. SOE Dharmawangsa dan AMC merupakan perusahaan terafiliasi. Bank tidak memiliki kepemilikan saham ataupun keterlibatan dalam aktivitas di dalam kedua entitas ini.

11. LOANS AND SHARIA FINANCING/ RECEIVABLES (continued)

f. Other significant information (continued)

vi. On December 30, 2024, the Bank sold certain loans to PT AMC Dharma Jaya ("AMC") in the amount of Rp1,309,117, where the gross carrying value of the principal was Rp1,308,723 and the interest receivable was Rp394. The bank had previously established a full allowance for impairment losses so that the carrying value was Rpnil. The sale of the credit granted was carried out through a sale and purchase deed and cessie dated December 30, 2024 and from that date the Bank stopped recognizing the credit. In accordance with the provisions of the sale and purchase deed and cessie, the Bank has transferred all rights to cash flows and also transferred all risks and benefits of the credit granted for sale. Therefore, the Bank derecognized this credit and recognized the recovery of all previously established allowances for impairment losses.

On the same date, the Bank purchased sharia securities, namely Sukuk Wakalah BI Al-Istitsmar ("Sukuk") issued by PT Aviasi Pariwisata Indonesia (Persero) from the Subsidiary of Enterprise ("SOE") Dharmawangsa Fund with a value of Rp3,224,017. This sukuk has been recorded at its fair value of Rp2,049,646 at the date of purchase (see Note 8 (Securities). SOE Dharmawangsa Fund is a sub fund of Namco Indonesia Raya VCC which is managed by Mandiri Investment Management Pte. Ltd. as investment manager. The majority shareholder of AMC is Bidara Pte. Ltd. with ownership of 99.9%, where the sole shareholder is Raflesia Jaya Pte. Ltd. Is Henry Shaw as one of the Director Namco Indonesia Raya VCC. SOE Dharmawangsa and AMC are affiliated companies. The Bank does not have share ownership or involvement in activities in these two entities.

11. KREDIT YANG DIBERIKAN DAN PEMBIAYAAN/ PIUTANG SYARIAH (lanjutan)

f. Informasi pokok lainnya (lanjutan)

Pada tanggal 29 Desember 2023, Bank menjual kredit yang diberikan tertentu kepada PT AMC Padma Jaya (“AMC”) sejumlah Rp872.378 dimana nilai tercatat bruto atas pokok adalah Rp860.503 dan tagihan bunga adalah Rp11.875. Bank sebelumnya telah membentuk cadangan kerugian penurunan nilai secara penuh sehingga nilai tercatatnya adalah Rpnihil. Penjualan kredit yang diberikan ini dilakukan melalui akta jual beli dan cessie tertanggal 29 Desember 2023 dan sejak tanggal tersebut Bank menghentikan pengakuan kredit tersebut. Sesuai dengan ketentuan dalam akta jual beli dan cessie tersebut, Bank telah mengalihkan seluruh hak atas arus kas dan juga mengalihkan seluruh risiko dan manfaat atas kredit yang diberikan yang dijual tersebut. Oleh karena itu, Bank menghentikan pengakuan atas kredit yang diberikan ini dan mengakui pemulihan seluruh cadangan kerugian penurunan nilai yang dibentuk sebelumnya.

Pada tanggal yang sama, Bank membeli surat berharga syariah yaitu Sukuk Wakalah BI Al-Istitsmar (“Sukuk”) yang diterbitkan oleh PT Angkasa Pura I (Persero) dari Subsidiary of Enterprise (“SOE”) Wijayakusuma Fund dengan nilai sebesar Rp2.268.378. Sukuk ini telah dicatat pada nilai wajarnya sebesar Rp 1.465.100 pada tanggal pembelian (lihat Catatan 8 (Efek-Efek)). SOE Wijayakusuma Fund merupakan sub fund dari Namco Indonesia Raya VCC yang dikelola oleh Mandiri Investment Management Pte. Ltd. selaku manajer investasi. Pemegang mayoritas saham AMC adalah Raflesia Jaya Pte. Ltd. dengan kepemilikan sebesar 99,9%, dimana pemegang saham tunggal Raflesia Jaya Pte. Ltd. adalah Namco Indonesia Raya VCC. SOE Wijayakusuma dan AMC merupakan perusahaan terafiliasi. Bank tidak memiliki kepemilikan saham ataupun keterlibatan dalam aktivitas di dalam kedua entitas ini.

11. LOANS AND SHARIA FINANCING/ RECEIVABLES (continued)

f. Other significant information (continued)

On December 29, 2023, the Bank sold certain loans to PT AMC Padma Jaya ("AMC") in the amount of Rp872,378, where the gross carrying value of the principal was Rp860,503 and the interest receivable was Rp11,875. The bank had previously established a full allowance for impairment losses so that the carrying value was Rpnil. The sale of the credit granted was carried out through a sale and purchase deed and cessie dated December 29, 2023 and from that date the Bank stopped recognizing the credit. In accordance with the provisions of the sale and purchase deed and cessie, the Bank has transferred all rights to cash flows and also transferred all risks and benefits of the credit granted for sale. Therefore, the Bank derecognized this credit and recognized the recovery of all previously established allowances for impairment losses.

On the same date, the Bank purchased sharia securities, namely Sukuk Wakalah BI Al-Istitsmar ("Sukuk") issued by PT Angkasa Pura I (Persero) from the Subsidiary of Enterprise ("SOE") Wijayakusuma Fund with a value of Rp2,268,378. This sukuk has been recorded at its fair value of Rp1,465,100 at the date of purchase (see Note 8 (Securities)). SOE Wijayakusuma Fund is a sub fund of Namco Indonesia Raya VCC which is managed by Mandiri Investment Management Pte. Ltd. as investment manager. The majority shareholder of AMC is Raflesia Jaya Pte. Ltd. with ownership of 99.9%, where the sole shareholder is Raflesia Jaya Pte. Ltd. is Namco Indonesia Raya VCC. SOE Wijayakusuma and AMC are affiliated companies. The Bank does not have share ownership or involvement in activities in these two entities.

11. KREDIT YANG DIBERIKAN DAN PEMBIAYAAN/ PIUTANG SYARIAH (lanjutan)

f. Informasi pokok lainnya (lanjutan)

Mempertimbangkan transaksi pembelian sukuk dan penjualan kredit yang diberikan di atas dilakukan pada waktu yang sama dan dengan pihak-pihak lawan yang terafiliasi, Bank melihat transaksi-transaksi ini sebagai transaksi yang saling berkaitan sehingga dampak keuangan dari kedua transaksi diakui dalam akun beban penyisihan kerugian penurunan nilai aset keuangan dan aset non keuangan pada laporan laba rugi Bank pada tanggal transaksi.

vii. Kredit yang diberikan kepada direksi dan karyawan Bank merupakan kredit untuk membeli kendaraan dan keperluan pribadi lainnya yang dibebani bunga dengan suku bunga rata-rata pada tahun yang berakhir pada tanggal 31 Desember 2024, 2023 dan 2022 sebesar 5,76%, 6,01% dan 6,18%, dengan jangka waktu berkisar antara 1 sampai dengan 15 tahun. Kredit ini akan dibayar kembali melalui pemotongan gaji setiap bulan. Perbedaan antara tingkat bunga pinjaman karyawan dan *Base Lending Rate* (BLR) ditangguhkan dan dicatat sebagai beban yang ditangguhkan untuk pinjaman karyawan, bagian dari aset lain-lain. Besarnya akun beban yang ditangguhkan untuk pinjaman karyawan sebesar Rp341.757, Rp400.702 dan Rp459.549 pada tanggal 31 Desember 2024, 2023 dan 2022 (Catatan 16).

viii. Kredit yang diberikan dan pembiayaan/ piutang syariah kepada pihak-pihak berelasi pada tanggal 31 Desember 2024, 2023 dan 2022 masing-masing sebesar Rp28.147.481, Rp27.772.686 dan Rp19.696.799 (Catatan 44). Persentase kredit yang diberikan dan pembiayaan/ piutang syariah dari pihak-pihak berelasi terhadap jumlah kredit yang diberikan dan pembiayaan/piutang syariah masing-masing pada tanggal 31 Desember 2024, 2023 dan 2022 adalah sebesar 7,86%, 8,32% dan 6,60%.

11. LOANS AND SHARIA FINANCING/ RECEIVABLES (continued)

f. Other significant information (continued)

Considering that the sukuk purchase and credit sales transactions provided above were carried out at the same time and with affiliated counterparties, the Bank views these transactions as interrelated transactions so that the financial impact of both transactions is recognized in the provision for impairment lossess on financial and non-financial aasets in the profit and loss statement Bank on the transaction date.

vii. The loans given to the Bank's directors and employees consist of loans intended for purchase of vehicles and other personal necessities. These loans earn an average interest of 5.76%, 6.01% and 6.18%, for the year ended December 31, 2024, 2023 and 2022, with term ranging from 1 to 15 years. This loan will be repaid through employee deduction salary. Difference between employee loan's interest rates and Base Lending Rate (BLR) is deferred and recorded as deferred expense for employee loans as part of other assets. Deferred expense for employee loans amounted to Rp341,757, Rp400,702 and Rp459,549 as of December 31, 2024, 2023 and 2022, respectively (Note 16).

viii. As of December 31, 2024, 2023 and 2022, the outstanding balances of loans and sharia financing/receivables from related parties amounted to Rp28,147,481, Rp27,772,686 and Rp19,696,799, respectively (Note 44). As of December 31, 2024, 2023 and 2022, the percentage of loans and sharia financing/receivables from related parties represent approximately 7.86%, 8.32% and 6.60%, respectively, of the total loans and sharia financing/receivables.

11. KREDIT YANG DIBERIKAN DAN PEMBIAYAAN/ PIUTANG SYARIAH (lanjutan)

f. Informasi pokok lainnya (lanjutan)

ix. Perubahan nilai tercatat dan cadangan kerugian penurunan nilai kredit yang diberikan dan pembiayaan/piutang syariah adalah sebagai berikut:

11. LOANS AND SHARIA FINANCING/ RECEIVABLES (continued)

f. Other significant information (continued)

ix. The movements in the gross carrying amount and allowance for impairment losses on loans and sharia financing/receivables are as follows:

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Saldo awal tahun	15.591.964	15.674.923	14.435.760	*Balance at beginning of year*
Penyisihan kerugian penurunan nilai selama tahun berjalan* (Catatan 34)	847.517	2.907.844	4.039.507	*Provision for impairment losses during the year (Note 34)*
Penerimaan kembali kredit yang telah dihapusbukukan	82.469	77.065	71.716	*Recovery of loans written-off*
Penghapusbukuan kredit	(3.464.763)	(3.067.868)	(2.872.060)	*Loans written-off*
Saldo akhir tahun	**13.057.187**	**15.591.964**	**15.674.923**	***Balance at the end of year***

*) Termasuk dampak nilai wajar sukuk sebesar Rp1.174.371juta dan Rp803.278juta pada tahun 2024 dan 2023.

**) Included impact of fair value sukuk amounted Rp1,174,371million and Rp803,278million in 2024 and 2023.*

Perubahan nilai tercatat bruto adalah sebagai berikut:

Movements in the gross carrying amount are as follows:

	31 Desember/*December 31,* 2024					
	Stage 1	Stage 2	Stage 3	Syariah*)	Total	
Kredit yang diberikan dan pembiayaan/piutang syariah						***Loans and sharia financing/receivables***
Saldo Awal	243.236.678	33.119.298	20.227.884	37.114.281	333.698.141	*Beginning Balance*
Pengalihan ke:						*Transfer to:*
Stage 1	6.030.081	(5.807.436)	(222.645)	-	-	*Stage 1*
Stage 2	(11.650.757)	12.138.970	(488.213)	-	-	*Stage 2*
Stage 3	(2.966.383)	(1.941.500)	4.907.883	-	-	*Stage 3*
Total saldo awal setelah pengalihan	234.649.619	37.509.332	24.424.909	37.114.281	333.698.141	*Total opening balance after transfer*
Pengukuran kembali bersih nilai tercatat	(14.914.833)	(737.501)	(866.271)	(2.214.778)	(18.733.383)	*Net remeasurement of carrying amount*
Aset keuangan baru yang diterbitkan atau dibeli	52.640.932	197.834	691.175	10.583.276	64.113.217	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(13.080.174)	(1.053.826)	(2.197.638)	(1.308.642)	(17.640.280)	*Derecognized financial assets*
Aset keuangan yang dihapusbuku	(96.961)	(438.461)	(2.648.031)	(281.310)	(3.464.763)	*Written-off financial assets*
Total penambahan/(penurunan) tahun berjalan	24.548.964	(2.031.954)	(5.020.765)	6.778.546	24.274.791	*Total addition/(reversal) during the year*
Saldo akhir tahun	**259.198.583**	**35.477.378**	**19.404.144**	**43.892.827**	**357.972.932**	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"

**) Not applying SFAS No. 109, "Financial Instruments"*

11. KREDIT YANG DIBERIKAN DAN PEMBIAYAAN/ PIUTANG SYARIAH (lanjutan)

f. Informasi pokok lainnya (lanjutan)

ix. Perubahan nilai tercatat dan cadangan kerugian penurunan nilai kredit yang diberikan dan pembiayaan/piutang syariah adalah sebagai berikut: (lanjutan)

Perubahan nilai tercatat bruto adalah sebagai berikut: (lanjutan)

11. LOANS AND SHARIA FINANCING/ RECEIVABLES (continued)

f. Other significant information (continued)

ix. The movements in the gross carrying amount and allowance for impairment losses on loans and sharia financing/receivables are as follows: (continued)

Movements in the gross carrying amount are as follows: (continued)

31 Desember/*December 31,* 2023

	Stage 1	Stage 2	Stage 3	Syariah*)	Total	
Kredit yang diberikan dan pembiayaan/piutang syariah						***Loans and sharia financing/receivables***
Saldo Awal	220.360.764	28.662.115	17.634.686	31.624.139	298.281.704	*Beginning Balance*
Pengalihan ke:						*Transfer to:*
Stage 1	6.365.574	(6.168.358)	(197.216)	-	-	*Stage 1*
Stage 2	(13.235.646)	13.321.409	(85.763)	-	-	*Stage 2*
Stage 3	(4.641.382)	(1.297.379)	5.938.761	-	-	*Stage 3*
Total saldo awal setelah pengalihan	208.849.310	34.517.787	23.290.468	31.624.139	298.281.704	*Total opening balance after transfer*
Pengukuran kembali bersih nilai tercatat	(10.575.269)	(527.760)	(491.309)	(2.944.142)	(14.538.480)	*Net remeasurement of carrying amount*
Aset keuangan baru yang diterbitkan atau dibeli	61.107.511	104.446	1.528.461	9.244.792	71.985.210	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(16.016.044)	(702.994)	(1.800.346)	(443.041)	(18.962.425)	*Derecognized financial assets*
Aset keuangan yang dihapusbuku	(128.830)	(272.181)	(2.299.390)	(367.467)	(3.067.868)	*Written-off financial assets*
Total penambahan/(penurunan) tahun berjalan	34.387.368	(1.398.489)	(3.062.584)	5.490.142	35.416.437	*Total addition/(reversal) during the year*
Saldo akhir tahun	**243.236.678**	**33.119.298**	**20.227.884**	**37.114.281**	**333.698.141**	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"

**) Not applying SFAS No. 109, "Financial Instruments"*

31 Desember/*December 31,* 2022

	Stage 1	Stage 2	Stage 3	Syariah*)	Total	
Kredit yang diberikan dan pembiayaan/piutang syariah						***Loans and sharia financing/receivables***
Saldo Awal	200.610.568	29.282.802	17.392.063	27.549.858	274.835.291	*Beginning Balance*
Pengalihan ke:						*Transfer to:*
Stage 1	10.127.196	(9.252.362)	(874.834)	-	-	*Stage 1*
Stage 2	(10.109.606)	10.556.294	(446.688)	-	-	*Stage 2*
Stage 3	(4.362.863)	(678.482)	5.041.345	-	-	*Stage 3*
Total saldo awal setelah pengalihan	196.265.295	29.908.252	21.111.886	27.549.858	274.835.291	*Total opening balance after transfer*
Pengukuran kembali bersih nilai tercatat	(9.599.191)	(513.843)	(387.887)	(1.924.831)	(12.425.752)	*Net remeasurement of carrying amount*
Aset keuangan baru yang diterbitkan atau dibeli	46.634.491	72.127	31.440	7.261.078	53.999.136	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(12.910.849)	(702.799)	(753.529)	(887.734)	(15.254.911)	*Derecognized financial assets*
Aset keuangan yang dihapusbuku	(28.982)	(101.622)	(2.367.224)	(374.232)	(2.872.060)	*Written-off financial assets*
Total penambahan/(penurunan) tahun berjalan	24.095.469	(1.246.137)	(3.477.200)	4.074.281	23.446.413	*Total addition/(reversal) during the year*
Saldo akhir tahun	**220.360.764**	**28.662.115**	**17.634.686**	**31.624.139**	**298.281.704**	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"

**) Not applying SFAS No. 109, "Financial Instruments"*

11. KREDIT YANG DIBERIKAN DAN PEMBIAYAAN/ PIUTANG SYARIAH (lanjutan)

f. Informasi pokok lainnya (lanjutan)

ix. Perubahan nilai tercatat dan cadangan kerugian penurunan nilai kredit yang diberikan dan pembiayaan/piutang syariah adalah sebagai berikut: (lanjutan)

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut:

11. LOANS AND SHARIA FINANCING/ RECEIVABLES (continued)

f. Other significant information (continued)

ix. The movements in the gross carrying amount and allowance for impairment losses on loans and sharia financing/receivables are as follows: (continued)

The movements in the allowance for impairment losses are as follows:

	31 Desember/*December 31*, 2024					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
Kredit yang diberikan dan pembiayaan/piutang syariah						***Loans and sharia financing/receivables***
Saldo Awal	1.494.287	3.407.511	9.289.738	1.400.428	15.591.964	*Beginning Balance*
Pengalihan ke:						*Transfer to:*
Stage 1	477.104	(389.026)	(88.078)	-	-	*Stage 1*
Stage 2	(137.427)	367.641	(230.214)	-	-	*Stage 2*
Stage 3	(78.508)	(298.225)	376.733	-	-	*Stage 3*
Total saldo awal setelah pengalihan	1.755.456	3.087.901	9.348.179	1.400.428	15.591.964	*Total opening balance after transfer*
Pengukuran kembali bersih penurunan nilai	(184.904)	1.085.761	1.084.554	(144.156)	1.841.255	*Net remeasurement of impairment losses*
Aset keuangan baru yang diterbitkan atau dibeli	384.334	34.242	169.542	421.410	1.009.528	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(152.127)	(204.909)	(1.496.642)	(67.119)	(1.920.797)	*Derecognized financial assets*
Aset keuangan yang dihapusbuku	(96.961)	(438.461)	(2.648.031)	(281.310)	(3.464.763)	*Written-off financial assets*
Total penambahan/(penurunan) tahun berjalan	(49.658)	476.633	(2.890.577)	(71.175)	(2.534.777)	*Total addition/(reversal) during the year*
Saldo akhir tahun	**1.705.798**	**3.564.534**	**6.457.602**	**1.329.253**	**13.057.187**	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"

**) Not applying SFAS No. 109, "Financial Instruments"*

11. KREDIT YANG DIBERIKAN DAN PEMBIAYAAN/ PIUTANG SYARIAH (lanjutan)

f. Informasi pokok lainnya (lanjutan)

ix. Perubahan nilai tercatat dan cadangan kerugian penurunan nilai kredit yang diberikan dan pembiayaan/piutang syariah adalah sebagai berikut: (lanjutan)

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut: (lanjutan)

11. LOANS AND SHARIA FINANCING/ RECEIVABLES (continued)

f. Other significant information (continued)

ix. The movements in the gross carrying amount and allowance for impairment losses on loans and sharia financing/receivables are as follows: (continued)

The movements in the allowance for impairment losses are as follows: (continued)

31 Desember/*December 31*, 2023

	Stage 1	Stage 2	Stage 3	Syariah*)	Total	
Kredit yang diberikan dan pembiayaan/piutang syariah						***Loans and sharia financing/receivables***
Saldo Awal	1.694.821	3.525.156	8.884.937	1.570.009	15.674.923	*Beginning Balance*
Pengalihan ke:						*Transfer to:*
Stage 1	624.497	(525.510)	(98.987)	-	-	*Stage 1*
Stage 2	(252.951)	300.934	(47.983)	-	-	*Stage 2*
Stage 3	(144.285)	(178.906)	323.191	-	-	*Stage 3*
Total saldo awal setelah pengalihan	1.922.082	3.121.674	9.061.158	1.570.009	15.674.923	*Total opening balance after transfer*
Pengukuran kembali bersih penurunan nilai	(432.700)	655.257	3.386.320	197.060	3.805.937	*Net remeasurement of impairment losses*
Aset keuangan baru yang diterbitkan atau dibeli	336.406	9.214	206.860	25.218	577.698	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(202.671)	(106.453)	(1.065.210)	(24.392)	(1.398.726)	*Derecognized financial assets*
Aset keuangan yang dihapusbuku	(128.830)	(272.181)	(2.299.390)	(367.467)	(3.067.868)	*Written-off financial assets*
Total penambahan/(penurunan) tahun berjalan	(427.795)	285.837	228.580	(169.581)	(82.959)	*Total addition/(reversal) during the year*
Saldo akhir tahun	**1.494.287**	**3.407.511**	**9.289.738**	**1.400.428**	**15.591.964**	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"

**) Not applying SFAS No. 109, "Financial Instruments"*

31 Desember/*December 31*, 2022

	Stage 1	Stage 2	Stage 3	Syariah*)	Total	
Kredit yang diberikan dan pembiayaan/piutang syariah						***Loans and sharia financing/receivables***
Saldo Awal	1.209.325	2.309.833	9.646.739	1.269.863	14.435.760	*Beginning Balance*
Pengalihan ke:						*Transfer to:*
Stage 1	663.412	(499.909)	(163.503)	-	-	*Stage 1*
Stage 2	(53.917)	160.278	(106.361)	-	-	*Stage 2*
Stage 3	(28.068)	(175.118)	203.186	-	-	*Stage 3*
Total saldo awal setelah pengalihan	1.790.752	1.795.084	9.580.061	1.269.863	14.435.760	*Total opening balance after transfer*
Pengukuran kembali bersih penurunan nilai	(226.641)	1.887.803	2.066.364	477.724	4.205.250	*Net remeasurement of impairment losses*
Aset keuangan baru yang diterbitkan atau dibeli	300.732	4.698	15.139	238.053	558.622	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(141.040)	(60.807)	(409.403)	(41.399)	(652.649)	*Derecognized financial assets*
Aset keuangan yang dihapusbuku	(28.982)	(101.622)	(2.367.224)	(374.232)	(2.872.060)	*Written-off financial assets*
Total penambahan/(penurunan) tahun berjalan	(95.931)	1.730.072	(695.124)	300.146	1.239.163	*Total addition/(reversal) during the year*
Saldo akhir tahun	**1.694.821**	**3.525.156**	**8.884.937**	**1.570.009**	**15.674.923**	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"

**) Not applying SFAS No. 109, "Financial Instruments"*

11. KREDIT YANG DIBERIKAN DAN PEMBIAYAAN/ PIUTANG SYARIAH (lanjutan)

f. Informasi pokok lainnya (lanjutan)

ix. Perubahan nilai tercatat dan cadangan kerugian penurunan nilai kredit yang diberikan dan pembiayaan/piutang syariah adalah sebagai berikut: (lanjutan)

Termasuk di dalam saldo cadangan kerugian adalah cadangan kerugian pembiayaan/piutang syariah sebesar Rp1.329.253, Rp1.400.428 dan Rp1.570.009, masing-masing pada tanggal 31 Desember 2024, 2023 dan 2022.

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai kredit yang diberikan dan pembiayaan/piutang syariah yang dibentuk telah memadai.

x. Fungsi pengawasan kredit Bank berfokus pada pencegahan penurunan kualitas portofolio kredit dan aktivitas penyaluran kredit yang tidak sehat yang dapat mengakibatkan timbulnya kerugian. Risiko kredit dikelola dan diatasi dengan membuat pembatasan penyaluran kredit *(credit limit)* dan kebijakan penyaluran kredit yang seragam, melakukan pengawasan portofolio individual secara periodik dan pengukuran tingkat kolektibilitas portofolio kredit.

xi. Kredit sindikasi merupakan kredit yang diberikan kepada nasabah di bawah perjanjian pembiayaan bersama dengan bank-bank lain. Keikutsertaan Bank sebagai anggota sindikasi dengan persentase penyertaan sebesar 7,28%, 8,61% dan 7,62% dari jumlah kredit sindikasi masing-masing pada tanggal 31 Desember 2024, 2023 dan 2022.

xii. Kredit yang telah dihapusbukukan oleh Bank dicatat sebagai kredit *off balance sheet* di dalam rekening administratif.

g. Informasi mengenai klasifikasi aset keuangan yang mengalami penurunan nilai dan tidak mengalami penurunan nilai dan kualitas kredit diungkapkan pada Catatan 45.

11. LOANS AND SHARIA FINANCING/ RECEIVABLES (continued)

f. Other significant information (continued)

ix. The movements in the gross carrying amount and allowance for impairment losses on loans and sharia financing/receivables are as follows: (continued)

As of December 31, 2024, 2023 and 2022, the balance of allowance for impairment losses includes allowance for impairment losses on sharia financing/receivables amounting to Rp1,329,253, Rp1,400,428 and Rp1,570,009, respectively.

Management believes that the amount of allowance for impairment losses on the loans and sharia financing/receivables is adequate.

x. The credit control function of the Bank focuses on preventing the deterioration of the quality of credit portfolio and unsound practices in granting credit facilities that may result in losses. Credit risks are managed by establishing credit limits and setting consistent lending policies, periodic monitoring of individual portfolio, and measuring the collectibility level of credit portfolio.

xi. Syndicated loans represent loans provided to customers under syndication agreements with other banks. As of December 31, 2024, 2023 and 2022, the Bank's share as a co-lender in syndicated loans is 7.28%, 8.61% and 7.62% for each, respectively, of the total syndicated loans.

xii. The loans written-off by the Bank are recorded as off balance sheet in the administrative account.

g. Information with respect to classification of impaired and not impaired and credit quality of financial assets are disclosed in Note 45.

12. TAGIHAN DAN LIABILITAS DERIVATIF

Bank menerapkan akuntansi lindung nilai atas arus kas dengan tujuan untuk melindungi suatu instrumen atau kelompok instrumen dari eksposur variabilitas arus kas yang dapat diatribusikan pada risiko tertentu yang terkait dengan aset atau liabilitas yang diakui (seperti seluruh atau sebagian pembayaran bunga di masa depan atas utang dengan mata uang asing) atau yang dapat diatribusikan pada risiko tertentu yang terkait dengan prakiraan transaksi yang kemungkinan besar terjadi, dan dapat mempengaruhi laba rugi.

Pada tanggal 10 November 2022 dan 18 November 2022, Bank melakukan lindung nilai arus kas atas suku bunga dari obligasi subordinasi sebesar USD 300 juta (nilai penuh) dengan *Cross Currency Swap (CCS)*, dengan nilai nosional sebesar USD 72 juta (nilai penuh).

Pada tanggal 28 Juli 2022 Bank melakukan lindung nilai arus kas atas suku bunga dan nilai pokok dari pinjaman korporasi Japan International Cooperation Agency (JICA) sebesar JPY 7 miliar (nilai penuh) dengan *Cross Currency Swap (CCS)*, dengan nilai nosional sebesar JPY 3 miliar (nilai penuh).

Pada tanggal 24 Januari 2020 Bank melakukan lindung nilai arus kas atas suku bunga dan nilai pokok dari obligasi subordinasi sebesar USD 300 juta (nilai penuh) dengan *Cross Currency Swap*, dengan nilai nosional sebesar USD 150 juta (nilai penuh)

Perubahan nilai wajar dari kontrak *CCS* sebagai instrumen lindung nilai yang ditentukan sebagai lindung nilai yang efektif (yaitu bagian yang saling hapus) diakui dalam penghasilan komprehensif lain. Setiap sisa keuntungan/kerugian atas instrumen lindung nilai (yaitu ketidakefektifan) untuk lindung nilai diakui dalam laba rugi.

Sejak dimulainya akuntansi lindung nilai arus kas tersebut, manajemen telah memiliki dokumentasi mengenai hubungan antara instrumen lindung nilai dan item yang dilindung nilai dan juga tujuan manajemen risikonya serta strategi dalam melakukan berbagai transaksi lindung nilai.

12. DERIVATIVE RECEIVABLE AND LIABILITIES

Bank implemented hedge accounting of the cash flow with purpose to protect an instrument from exposure of cashflow variability that can be atributed at certain risk that related to acknowledge assets or liabilities (such as all or partial of future interest payment on foreign currency debt) or which can be atributed to certain risk that are most likely to occur and can affect profit or loss.

On November 10, 2022 and November 18, 2022, Bank entered into cashflow hedge for interest rate and principal of subordinated bond amounting to USD 300 milion (full amount) with cross currency swap (CCS), with notional value amount of USD 72 million (full amount).

On July 28, 2022, Bank entered into cashflow hedge for interest rate and principal of corporate loan Japan International Corporate Agency (JICA) amounting to JPY 7 bilion (full amount) with cross currency swap (CCS), with notional value amount of JPY 3 billion (full amount).

On January 24, 2020, Bank entered into cashflow hedge for interest rate and principal of Subordinated Bond amounting to USD 300 milion (full amount) with cross currency swap (CCS), with notional value amount of USD 150 million (full amount)

The changes of fair value of CCS contract as a hedging instrument that is designated as an effective hedge (that is, a part of set off) are recognized in other comprehensive income. The remaining gains/losses on the hedging instrument (ie. inefectiveness) of the hedge, recognized in profit/loss.

Since the inception of the cashflow hedge accounting, management has documented the relationship between hedging instruments and hedged items as well as the objectives of risk management and strategies for engaging various hedging transaction.

12. TAGIHAN DAN LIABILITAS DERIVATIF (lanjutan)

Dokumentasi juga meliputi penilaian efektivitas lindung nilai dari derivatif yang digunakan sebagai instrumen lindung nilai dan item yang dilindung nilai. Penilaian ini dilakukan baik pada permulaan lindung nilai tersebut diterapkan dan pada saat-saat berikutnya secara berkelanjutan.

12. DERIVATIVE RECEIVABLE AND LIABILITIES (continued)

The documentation also includes assessing the effectivieness of hedge from derivative that used as hedging instrument and hedged items. This assessment is carried out both at the beginning of the hedging applied and at later on an ongoing basis.

31 Desember/*December 31*, 2024

Tanggal Transaksi/ *Transaction Date*	Pihak ketiga/ *Third Parties*	Nosional/ *Notional*	Suku bunga yang dibayarkan/ *Interest Paid*	Suku bunga yang diterima/ *Interest eceivable*	Jatuh tempo/ *Maturity Date*
27 Januari/ *January 27*, 2020	Standard Chartered Bank	USD25.000.000	8,30%	4,20%	23 Januari/ *January 23*, 2025
27 Januari/ *January 27*, 2020	Deutsche Bank AG	USD25.000.000	8,30%	4,20%	23 Januari/ *January 23*, 2025
10 November/ *November* 10, 2022	ANZ Bank	USD25.000.000	6,20%	4,20%	23 Januari/ *January 23*, 2025
10 November/ *November 10*, 2022	UOB Bank	USD25.000.000	6,20%	4,20%	23 Januari/ *January 23*, 2025
18 November/ *November 18*, 2022	Standard Chartered Bank	USD22.000.000	6,33%	4,20%	23 Januari/ *January 23*, 2025

31 Desember/*December 31*, 2023

Tanggal Transaksi/ *Transaction Date*	Pihak ketiga/ *Third Parties*	Nosional/ *Notional*	Suku bunga yang dibayarkan/ *Interest Paid*	Suku bunga yang diterima/ *Interest eceivable*	Jatuh tempo/ *Maturity Date*
27 Januari/ *January 27*, 2020	Standard Chartered Bank	USD25.000.000	8,30%	4,20%	23 Januari/ *January 23*, 2025
27 Januari/ *January 27*, 2020	Deutsche Bank AG	USD25.000.000	8,30%	4,20%	23 Januari/ *January 23*, 2025
10 November/ *November* 10, 2022	ANZ Bank	USD25.000.000	6,20%	4,20%	23 Januari/ *January 23*, 2025
10 November/ *November 10*, 2022	UOB Bank	USD25.000.000	6,20%	4,20%	23 Januari/ *January 23*, 2025
18 November/ *November 18*, 2022	Standard Chartered Bank	USD22.000.000	6,33%	4,20%	23 Januari/ *January 23*, 2025

12. TAGIHAN DAN LIABILITAS DERIVATIF (lanjutan)

12. DERIVATIVE RECEIVABLE AND LIABILITIES (continued)

31 Desember/*December 31*, 2022

Tanggal Transaksi/ *Transaction Date*	Pihak ketiga/ *Third Parties*	Nosional/ *Notional*	Suku bunga yang dibayarkan/ *Interest Paid*	Suku bunga yang diterima/ *Interest eceivable*	Jatuh tempo/ *Maturity Date*
27 Januari/ *January 27,* 2020	Standard Chartered Bank	USD5.000.000	8,25%	4,20%	23 Januari/ *January 23,* 2023
27 Januari/ *January 27,* 2020	Standard Chartered Bank	USD25.000.000	8,30%	4,20%	23 Januari/ *January 23,* 2025
27 Januari/ *January 27,* 2020	Deutsche Bank AG	USD20.000.000	8,25%	4,20%	23 Januari/ *January 23,* 2023
27 Januari/ *January 27,* 2020	Deutsche Bank AG	USD25.000.000	8,30%	4,20%	3 Januari/ *January 3,* 2025
10 November/ *November 10,* 2022	ANZ Bank	USD25.000.000	6,20%	4,20%	23 Januari/ *January 23,* 2025
10 November/ *November 10,* 2022	UOB Bank	USD25.000.000	6,20%	4,20%	23 Januari/ *January 23,* 2025
18 November/ *November 18,* 2022	Standard Chartered Bank	USD22.000.000	6,33%	4,20%	23 Januari/ *January 23,* 2025
28 Juli/ *July 28,* 2022	ANZ Bank	JPY1.500.000.000	6,11%	0,90%	10 Mei/ *May* 10, 2023
28 Juli/ *July 28,* 2022	UOB Bank	JPY1.500.000.000	6,11%	0,90%	10 Mei/ *May* 10, 2023

Selisih nilai wajar instrumen derivatif yang ditujukan sebagai lindung nilai arus kas dan kerugian selisih kurs atas obligasi subordinasi dalam mata uang asing dicatat pada penghasilan komprehensif lain masing-masing pada tanggal 31 Desember 2024, 2023 dan 2022. Saldo kerugian tersebut sebesar Rp44.082, Rp32.346 dan Rp49.301 masing-masing pada tanggal 31 Desember 2024, 2023 dan 2022 disajikan sebagai ”Bagian efektif lindung nilai arus kas” pada ekuitas.

The fair value difference of derivative instruments designated as cash flow hedges and loss on foreign exchange of subordinated bonds denominated in foreign currency were reported as other comprehensive income amounting to Rp44,082, Rp32,346 and Rp49,301 as of December 31, 2024, 2023 and 2022, respectively. The amount is presented as “Effective portion of cashflow hedge” in equity.

Ringkasan transaksi derivatif sebagai berikut:

The summary of the derivatives transaction as follow:

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Tagihan Derivatif				*Derivative Receivable*
Cross currency interest rate swap	102.843	32.176	103.939	*Cross currency interest rate swap*
Total	**102.843**	**32.176**	**103.939**	***Total***

13. TAGIHAN AKSEPTASI / *13. ACCEPTANCES RECEIVABLE*

Rincian tagihan akseptasi kepada nasabah adalah sebagai berikut:

The details of acceptances receivable from customers are as follows:

a. Berdasarkan Jenis dan Mata Uang / *a. By Type and Currency*

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Pihak Berelasi				*Related Parties*
Surat Kredit Berdokumen Dalam Negeri (SKBDN)	433.708	68.746	131.356	*Domestic Document Letter of Credit*
Pihak Ketiga				*Third Parties*
Surat Kredit Berdokumen Dalam Negeri (SKBDN)	508.190	475.821	282.045	*Domestic Document Letter of Credit*
Letter of Credit	-	-	7.161	*Letter of Credit*
Total	941.898	544.567	420.562	*Total*
Cadangan kerugian penurunan nilai	(1.987)	(23.876)	(136)	*Alowance for impairment losses*
Total	**939.911**	**520.691**	**420.426**	***Total***

b. Berdasarkan Jangka Waktu / *b. By Period*

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
≤ 1 bulan	96.814	362.394	80.697	*≤ 1 month*
> 1 bulan - 3 bulan	724.495	27.223	49.568	*> 1 month - 3 months*
> 3 bulan - 1 tahun	120.589	154.950	290.297	*> 3 months - 1 year*
Total	**941.898**	**544.567**	**420.562**	***Total***

c. Nilai tercatat bruto dan cadangan kerugian penurunan nilai

Perubahan nilai tercatat bruto adalah sebagai berikut:

c. Gross carrying amount and allowance for impairment losses

Movements in the gross carrying amount are as follows:

	31 Desember/*December 31,* 2024					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
Tagihan akseptasi						***Acceptances receivable***
Saldo Awal	488.494	56.073	-	-	544.567	*Beginning balance*
Aset keuangan baru yang diterbitkan atau dibeli	941.898	(56.073)	-	-	885.825	*New financial assets originated or purchased*
Pembayaran kembali	(488.494)	-	-	-	(488.494)	*Repayment*
Total penambahan/(penurunan) tahun berjalan	453.404	(56.073)	-	-	397.331	*Total addition/(reversal)*
Saldo akhir periode	**941.898**	**-**	**-**	**-**	**941.898**	***Balance at the end of period***

13. TAGIHAN AKSEPTASI (lanjutan)

c. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Perubahan nilai tercatat bruto adalah sebagai berikut: (lanjutan)

13. ACCEPTANCES RECEIVABLE (continued)

c. Gross carrying amount and allowance for impairment losses (continued)

Movements in the gross carrying amount are as follows: (continued)

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"

*) Not applying SFAS No. 109, "Financial Instruments"

	31 Desember/*December 31*, 2023					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
Tagihan akseptasi						***Acceptances receivable***
Saldo Awal	420.562	-	-	-	420.562	*Beginning balance*
Aset keuangan baru yang diterbitkan atau dibeli	488.494	56.073	-	-	544.567	*New financial assets originated or purchased*
Pembayaran kembali	(420.562)	-	-	-	(420.562)	*Repayment*
Total penambahan/(penurunan) tahun berjalan	67.932	56.073	**-**	**-**	124.005	*Total addition/(reversal)*
Saldo akhir tahun	**488.494**	**56.073**	**-**	**-**	**544.567**	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"

*) Not applying SFAS No. 109, "Financial Instruments"

	31 Desember/*December 31*, 2022					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
Tagihan akseptasi						***Acceptances receivable***
Saldo Awal	454.140	-	-	-	454.140	*Beginning balance*
Aset keuangan baru yang diterbitkan atau dibeli	420.562	-	-	-	420.562	*New financial assets originated or purchased*
Pembayaran kembali	(454.140)	-	-	-	(454.140)	*Repayment*
Total penambahan/(penurunan) tahun berjalan	**(33.578)**	**-**	**-**	**-**	**(33.578)**	*Total addition/(reversal)*
Saldo akhir tahun	**420.562**	**-**	**-**	**-**	**420.562**	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"

*) Not applying SFAS No. 109, "Financial Instruments"

13. TAGIHAN AKSEPTASI (lanjutan)

c. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut:

13. ACCEPTANCES RECEIVABLE (continued)

c. Gross carrying amount and allowance for impairment losses (continued)

The movements in the allowance for impairment losses are as follows:

31 Desember/*December 31*, 2024

	Stage 1	Stage 2	Stage 3	Syariah*)	Total	
Tagihan akseptasi						***Acceptances receivable***
Saldo awal	1.447	22.429	-	-	23.876	*Beginning Balance*
Aset keuangan baru yang diterbitkan atau dibeli	1.987	-	-		1.987	*New financial assets originated or purchased*
Pembayaran kembali	(1.447)	(22.429)	-	-	(23.876)	*Repayment*
Total penambahan/(penurunan) tahun berjalan	540	(22.429)	-	-	(21.889)	*Total addition/(reversal) during the year*
Saldo akhir periode	**1.987**	**-**	**-**	**-**	**1.987**	***Balance at the end of period***

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"

**) Not applying SFAS No. 109, "Financial Instruments"*

31 Desember/*December 31*, 2023

	Stage 1	Stage 2	Stage 3	Syariah*)	Total	
Tagihan akseptasi						***Acceptances receivable***
Saldo awal	136	-	-	-	136	*Beginning Balance*
Aset keuangan baru yang diterbitkan atau dibeli	1.447	22.429	-		23.876	*New financial assets originated or purchased*
Pembayaran kembali	(136)	-	-	-	(136)	*Repayment*
Total penambahan/(penurunan) tahun berjalan	1.311	22.429	-	-	23.740	*Total addition/(reversal) during the year*
Saldo akhir tahun	**1.447**	**22.429**	**-**	**-**	**23.876**	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"

**) Not applying SFAS No. 109, "Financial Instruments"*

31 Desember/*December 31*, 2022

	Stage 1	Stage 2	Stage 3	Syariah*)	Total	
Tagihan akseptasi						***Acceptances receivable***
Saldo awal	623	-	-	-	623	*Beginning Balance*
Aset keuangan baru yang diterbitkan atau dibeli	136				136	*New financial assets originated or purchased*
Pembayaran kembali	(623)	-	-	-	(623)	*Repayment*
Total penambahan/(penurunan) tahun berjalan	(487)	-	-	-	(487)	*Total addition/(reversal) during the year*
Saldo akhir tahun	**136**	**-**	**-**	**-**	**136**	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"

**) Not applying SFAS No. 109, "Financial Instruments"*

Bank melakukan penilaian atas penurunan nilai tagihan akseptasi secara kolektif.

Manajemen berpendapat bahwa jumlah cadangan kerugian atas tagihan yang dibentuk telah memadai.

The Bank assessed acceptance receivables collectively for impairment.

The management believes that the allowance for impairment losses provided on acceptances receivable is adequate.

14. ASET TETAP / *14. PREMISES AND EQUIPMENT*

Akun ini terdiri dari: / *This account consists of:*

	31 Desember/*December 31,* 2024					
	Saldo Awal/ *Beginning Balance*	**Revaluasi/ *Revaluation***	**Penambahan/ Reklasifikasi/ *Additions/ Reclassifications***	**Pengurangan/ Reklasifikasi/ *Deductions/ Reclassifications***	**Saldo Akhir/ *Ending Balance***	
Biaya/nilai revaluasi						*Cost/revaluation value*
Tanah	4.548.181	-	819.606	-	5.367.787	*Land*
Bangunan	1.860.935	-	762.769	-	2.623.704	*Buildings*
Peralatan kantor dan kendaraan bermotor	4.111.287	-	537.602	(557.075)	4.091.814	*Office furniture, fixtures, and motor vehicle*
	10.520.403	-	2.119.977	(557.075)	12.083.305	
Aset dalam penyelesaian	1.634.202	-	975.906	(1.461.362)	1.148.746	*Constructions in progress*
	12.154.605	-	3.095.883	(2.018.437)	13.232.051	
Aset hak guna	799.141	-	155.278	(126.513)	827.906	*Right of use of asset*
	12.953.746	-	3.251.161	(2.144.950)	14.059.957	
Akumulasi penyusutan						*Accumulated depreciation*
Bangunan	938.176	-	109.408	-	1.047.584	*Buildings*
Peralatan kantor dan kendaraan bermotor	3.421.448	-	417.575	(557.075)	3.281.948	*Office furniture, fixtures and motor vehicles*
	4.359.624	-	526.983	(557.075)	4.329.532	
Aset hak guna	476.310	-	204.497	(126.513)	554.294	*Right of use of asset*
	4.835.934	-	731.480	(683.588)	4.883.826	
Nilai Buku Neto	**8.117.812**				**9.176.131**	***Net Book Value***

	31 Desember/*December 31,* 2023					
	Saldo Awal/ *Beginning Balance*	**Revaluasi/ *Revaluation***	**Penambahan/ Reklasifikasi/ *Additions/ Reclassifications***	**Pengurangan/ Reklasifikasi/ *Deductions/ Reclassifications***	**Saldo Akhir/ *Ending Balance***	
Biaya/nilai revaluasi						*Cost/revaluation value*
Tanah	4.406.143	57.208	84.830	-	4.548.181	*Land*
Bangunan	1.730.187	-	130.748	-	1.860.935	*Buildings*
Peralatan kantor dan kendaraan bermotor	3.673.813	-	437.474	-	4.111.287	*Office furniture, fixtures, and motor vehicle*
	9.810.143	57.208	653.052	-	10.520.403	
Aset dalam penyelesaian	69.685	-	1.684.492	(119.975)	1.634.202	*Constructions in progress*
	9.879.828	57.208	2.337.544	(119.975)	12.154.605	
Aset hak guna	720.020		205.957	(126.836)	799.141	*Right of use of asset*
	10.599.848	57.208	2.543.501	(246.811)	12.953.746	
Akumulasi penyusutan						*Accumulated depreciation*
Bangunan	862.248	-	75.928	-	938.176	*Buildings*
Peralatan kantor dan kendaraan bermotor	3.007.502	-	413.946	-	3.421.448	*Office furniture, fixtures and motor vehicles*
	3.869.750	-	489.874	-	4.359.624	
Aset hak guna	376.295	-	226.851	(126.836)	476.310	*Right of use of asset*
	4.246.045	-	716.725	(126.836)	4.835.934	
Nilai Buku Neto	**6.353.803**				**8.117.812**	***Net Book Value***

14. ASET TETAP (lanjutan) / *14. PREMISES AND EQUIPMENT (continued)*

Akun ini terdiri dari: / *This account consists of:*

	31 Desember/*December 31,* 2022					
	Saldo Awal/ *Beginning Balance*	**Revaluasi/ *Revaluation***	**Penambahan/ Reklasifikasi*)/ *Additions/ Reclassifications***	**Pengurangan/ Reklasifikasi/ *Deductions/ Reclassifications***	**Saldo Akhir/ *Ending Balance***	
Biaya/nilai revaluasi						*Cost/revaluation value*
Tanah	3.981.531	200.574	224.038	-	4.406.143	*Land*
Bangunan	1.645.843	-	84.344	-	1.730.187	*Buildings*
Peralatan kantor dan kendaraan bermotor	3.188.072	-	485.741	-	3.673.813	*Office furniture, fixtures and motor vehicles*
	8.815.446	200.574	794.123	-	9.810.143	
Aset dalam penyelesaian	71.689	-	72.891	(74.895)	69.685	*Constructions in progress*
	8.887.135	200.574	867.014	(74.895)	9.879.828	
Aset hak guna	581.520	-	253.379	(114.879)	720.020	*Right of use of asset*
	9.468.655	200.574	1.120.393	(189.774)	10.599.848	
Akumulasi penyusutan						*Accumulated depreciation*
Bangunan	787.416	-	74.832	-	862.248	*Buildings*
Peralatan kantor dan kendaraan bermotor	2.655.788	-	351.714	-	3.007.502	*Office furniture, fixtures and motor vehicles*
	3.443.204	-	426.546	-	3.869.750	
Aset hak guna	288.660	-	202.514	(114.879)	376.295	*Right of use of asset*
	3.731.864	-	629.060	(114.879)	4.246.045	
Nilai Buku Neto	**5.736.791**				**6.353.803**	***Net Book Value***

Jumlah penyusutan aset tetap yang dibebankan pada tahun yang berakhir pada tanggal 31 Desember 2024, 2023 dan 2022 masing-masing sebesar Rp526.983, Rp489.874 dan Rp426.546 (Catatan 35).

Depreciation of premises and equipment and right of use asset charged to operations amounted to Rp526,983, Rp489,874 and Rp426,546, for the year ended December 31, 2024, 2023 and 2022, respectively (Note 35).

Nilai tercatat bruto dari aset tetap yang telah didepresiasi penuh oleh Bank namun masih digunakan masing-masing adalah sebesar Rp2.512.814, Rp2.659.757 dan Rp2.359.401 pada tanggal 31 Desember 2024, 2023 dan 2022.

The gross carrying amount of the Bank's fully depreciated premises and equipment that are still in use amounted to Rp2,512,814, Rp2,659,757 and Rp2,359,401 as of December 31, 2024, 2023 and 2022, respectively.

Hak atas tanah terdiri dari hak milik dan hak guna bangunan. Manajemen berpendapat bahwa jangka waktu hak atas tanah dapat diperbaharui atau diperpanjang kembali.

Landrights consist of ownership rights and rights to use. Management has the opinion that the terms of the landrights can be renewed or extended upon their expiration.

14. ASET TETAP (lanjutan)

Bank telah mengasuransikan aset tetap kecuali tanah untuk menutup kemungkinan kerugian terhadap risiko kebakaran dan pencurian kepada PT Asuransi Bina Griya (pihak berelasi) pada tanggal 31 Desember 2024, 2023 dan 2022 masing-masing sebesar Rp8.637.222, Rp4.148.624 dan Rp4.565.947.

Persentase tingkat penyelesaian aset dalam penyelesaian masing-masing pada tanggal 31 Desember 2024, 2023 dan 2022 masing-masing adalah sebagai berikut:

14. PREMISES AND EQUIPMENT (continued)

The Bank insured its premises and equipment from losses due to risks of fire and theft to PT Asuransi Bina Griya (related party) on date December 31, 2024, 2023 and 2022 amounting to Rp8,637,222, Rp4,148,624 and Rp4,565,947, respectively.

The percentage of completion of the constructions in progress as of December 31, 2024, 2023 and 2022:

	31 Desember/*December* 31, *2024*			
	Jumlah/ *Amount*	**Kisaran persentase jumlah tercatat terhadap nilai kontrak penyelesaian/ *Range percentage carrying amount to contract value***	**Kisaran persentase penyelesaian/ *Range percentage of completion***	
Bangunan	550.132	43,10% - 87,60%	43,10% - 87,60%	*Building*
Non Bangunan	598.614	2% - 95%	2% - 95%	*Non-Building*

	31 Desember/*December* 31, *2023*			
	Jumlah/ *Amount*	**Kisaran persentase jumlah tercatat terhadap nilai kontrak penyelesaian/ *Range percentage carrying amount to contract value***	**Kisaran persentase penyelesaian/ *Range percentage of completion***	
Bangunan	1.404.028	0% - 57,70%	0% - 57,70%	*Building*
Non Bangunan	230.174	5% - 95%	5% - 95%	*Non-Building*

	31 Desember/*December* 31, *2022*			
	Jumlah/ *Amount*	**Kisaran persentase jumlah tercatat terhadap nilai kontrak penyelesaian/ *Range percentage carrying amount to contract value***	**Kisaran persentase penyelesaian/ *Range percentage of completion***	
Bangunan	69.685	52,94% - 87%	52,94% - 87%	*Building*

Penilaian atas tanah di tahun 2016 dilakukan oleh penilai independen eksternal KJPP Immanuel, Johnny, dan Rekan melalui laporannya pada tanggal 19 April 2016. Selanjutnya di tahun 2019, Bank melakukan penilaian kembali atas tanah yang dimiliki yang dilakukan oleh penilai independen eksternal KJPP Agus, Ali, Firdaus dan Rekan dengan laporan tertanggal 22 Oktober 2019. Bank melakukan penilaian kembali atas tanah yang dimiliki pada tahun 2022 yang dilakukan oleh penilai independen eksternal KJPP Aditya Iskandar dan Rekan dengan laporan tertanggal 12 Desember 2022 yang ditandatangani oleh penilai Aditya Iskandar Dwiatmaja.

The valuations of land in 2016 were performed by an external independent appraiser KJPP Immanuel, Johnny, dan Rekan through its report dated April 19, 2016. Next in 2019, the bank revalued its land which was done by an external independent appraiser KJPP Agus, Ali, Firdaus and Partners with its report dated October 22, 2019. The bank revalued its land in 2022 which was done by an external independent appraiser KJPP Aditya Iskandar and Partners with its report dated December 12, 2022 which signed by appraiser Aditya Iskandar Dwiatmaja.

14. ASET TETAP (lanjutan)

Penilaian dilakukan sesuai dengan dan tunduk kepada ketentuan-ketentuan dari Kode Etik Penilai Indonesia (KEPI) dan berdasarkan POJK No. 28/POJK.04/2021 tanggal 30 Desember 2021 tentang "Penyajian Laporan Penilaian Properti Di Pasar Modal" dan Standar Penilaian Indonesia, ditentukan berdasarkan transaksi pasar terkini dan dilakukan dengan ketentuan-ketentuan yang lazim.

Dalam pengukuran nilai wajar tanah, Penilai Independen memperhitungkan kemampuan peserta pasar untuk menghasilkan manfaat ekonomi dengan penggunaan tertinggi dan terbaik atas aset atau dengan menjual aset ke peserta pasar lain yang akan menggunakan aset pada kondisi tertinggi dan penggunaan terbaik. Metode penilaian yang digunakan oleh Penilai Independen adalah pendekatan pasar.

Informasi mengenai penilaian kembali aset tetap untuk kelompok aset tanah yang dilakukan Bank tahun 2016, 2019, 2022 adalah sebagai berikut:

14. PREMISES AND EQUIPMENT (continued)

The appraisal is carried out in accordance with and subject to the provisions of the Indonesian Appraiser Code of Ethics (KEPI) and based on POJK No. 28/POJK.04/2021 dated December 30, 2021 concerning "Presentation of Property Valuation Reports in the Capital Market" and Indonesian Valuation Standards, determined based on recent market transactions and carried out with customary provisions.

In the fair value measurement of the land, the Independent Appraisers takes into account a market participant's ability to generate economic benefits by using the assets in its highest and best use or by selling it to another market participant that would use the asset in its highest and best use. The valuation method used by the Independent Appraiser is market approach.

Information on the revaluation of land performed by the Bank in 2016, 2019, 2022 are as follows:

	31 Desember/*December 31,* 2022			
	Nilai Buku sebelum Revaluasi/ *Carrying Amount Before Revaluation*	**Nilai Buku setelah Revaluasi/ *Carrying Amount after Revaluation***	**Keuntungan/(Kerugian) Revaluasi/ *Gain/(Loss) on Revaluation***	
Tanah	3.991.340	4.191.914	200.574	*Land*

	31 Desember/*December 31,* 2019			
	Nilai Buku sebelum Revaluasi/ *Carrying Amount Before Revaluation*	**Nilai Buku setelah Revaluasi/ *Carrying Amount after Revaluation***	**Keuntungan/(Kerugian) Revaluasi/ *Gain/(Loss) on Revaluation***	
Tanah	3.635.660	3.970.391	334.731	*Land*

	31 Desember/*December 31,* 2016			
	Nilai Buku sebelum Revaluasi/ *Carrying Amount Before Revaluation*	**Nilai Buku setelah Revaluasi/ *Carrying Amount after Revaluation***	**Keuntungan/(Kerugian) Revaluasi/ *Gain/(Loss) on Revaluation***	
Tanah	537.559	3.580.298	3.042.739	*Land*

Pada tahun 2023, Bank melakukan reklasifikasi atas properti terbengkalai yang memiliki nilai buku sebesar Rp25 dan melakukan pencatatan sebagai aset tetap. Pencatatan atas aset tetap tersebut berdasarkan hasil penilaian kembali yang dilakukan oleh Bank sesuai dengan nilai pasar aset. Penilaian Kembali yang dilakukan atas properti terbengkalai tersebut menghasilkan jumlah kenaikan tercatat sebesar Rp57.234 dimana kenaikan nilai tercatat yang timbul dari penilaian kembali dicatat sebagai "Surplus Revaluasi Aset Tetap", dan disajikan dalam penghasilan komprehensif lain sebesar Rp57.208.

In 2023, the Bank reclassified abandoned property which has a book value of Rp25 and recognised as a fixed asset. The recording of these fixed assets is based on the results of the revaluation carried out by the Bank according to the market value of the assets. The revaluation of the abandoned property resulted in an increase in the carrying amounting to Rp57,234, where the increase in the recorded value arising from the revaluation was recorded as "Fixed Asset Revaluation Surplus", and was presented in other comprehensive income amounting to Rp57,208.

14. ASET TETAP (lanjutan)

Penilaian kembali yang dilakukan atas tanah pada tahun 2022 menghasilkan jumlah kenaikan nilai tercatat sebesar Rp200.574 yang tercatat pada "Penghasilan Komprehensif Lain". Sedangkan penilaian kembali yang dilakukan atas tanah pada tahun 2019, menghasilkan jumlah kenaikan nilai tercatat sebesar Rp334.731 yang terdiri dari kenaikan nilai tanah yang dicatat sebagai "Penghasilan Komprehensif Lain" sebesar Rp341.000 dan penurunan nilai tanah yang diakui sebagai beban tahun berjalan sebesar Rp6.269. Kenaikan nilai tercatat yang timbul dari revaluasi tahun 2016 dicatat sebagai "Surplus Revaluasi Aset Tetap", dan disajikan dalam penghasilan komprehensif lain sebesar Rp3.042.739.

Pada tahun 2022 dan 2019, Bank melakukan penilaian kembali atas tanah tersebut bukan untuk tujuan perpajakan tetapi hanya untuk tujuan akuntansi sesuai dengan Standar Akuntansi Keuangan.

Penilaian kembali tanah pada tahun 2016 adalah untuk tujuan perpajakan dilakukan setelah mendapatkan persetujuan dari Direktorat Jenderal Pajak dengan Surat Keputusan No. KEP-435/WPJ.19/2016 tanggal 8 Juni 2016. Jumlah pajak yang telah dibayar oleh Bank sehubungan penilaian kembali tersebut adalah sebesar Rp75.748.

Jika tanah dicatat sebesar harga perolehan, maka pada tanggal 31 Desember 2024, 2023 dan 2022 adalah sebesar Rp1.790.401, Rp970.795 dan Rp828.757.

Nilai wajar atas tanah termasuk pada hirarki nilai wajar level 3.

Tidak ada aset tetap yang dimiliki Bank yang dijadikan jaminan pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022.

Manajemen berpendapat bahwa tidak terdapat penurunan nilai aset tetap dan jumlah nilai pertanggungan asuransi cukup untuk menutup risiko kerugian yang mungkin timbul atas aset tetap pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022.

14. PREMISES AND EQUIPMENT (continued)

The revaluation of land in 2022, resulted in an increase in the carrying amount of land amounting to Rp200,574 which consists of the increase in the carrying amount of land recognised as "Other Comprehensive Income". However, the revaluation of land in 2019, resulted in an increase in the carrying amount of land amounting to Rp334,731 which consists of the increase in the carrying amount of land recognised as "Other Comprehensive Income" amounting to Rp341,000 and a decrease in carrying amount of land recognised in the current year expenses amounting to Rp6,269. Increase in the carrying amount arising from revaluation in 2016 is recorded in "Premises and Equipment Revaluation Surplus" and presented in other comprehensive income amounting to Rp3,042,739.

In 2022 and 2019, Bank has revalued the value of that land not for tax purpose rather for the accounting purpose according to the Financial Accounting Standard.

Revaluation of land in 2016, for tax purposes is performed after the approval from Directorate General of Tax through its letter No. KEP-435/WPJ.19/2016 dated June 8, 2016. The amount of tax which has been paid by the Bank in relation with the revaluation was amounting to Rp75,748.

If land is recorded at historical cost basis, the amount as of December 31,2024, 2023 and 2022, would be Rp1,790,401, Rp970,795 and Rp828,757.

The fair value of land included in the fair value hierarchy as level 3.

As of December 31, 2024, 2023 and 2022, there are no fixed assets owned by the Bank which are pledged as collateral.

Management believes that there is no impairment in value of premises and equipments and the amount of insurance coverage is adequate to cover the risk of loss that may arise on the premises and equipments as of December 31, 2024, 2023 and 2022.

14. ASET TETAP (lanjutan)

Bank menyewa beberapa aset termasuk bangunan, rumah dinas, lahan ATM, kendaraan mobil, jaringan, mesin ATM, dan media promosi. Rata-rata masa sewa adalah 4 tahun.

Bank mempunyai sewa tertentu dengan masa sewa 12 bulan atau kurang dan sewa bernilai rendah. Bank menerapkan pengecualian pengakuan sewa jangka pendek dan sewa bernilai rendah untuk sewa tersebut.

Nilai tercatat untuk aset hak guna adalah sebagai berikut:

14. PREMISES AND EQUIPMENT (continued)

The Bank leases several assets including buildings, official residences, ATM space, car, network, ATM machine, and promotional media. The average lease term is 4 years.

The Bank also has certain leases with lease terms of 12 months or less and low value assets. The Bank applies the recognition exemptions of short-term leases and low-value assets for these leases.

The carrying amount of right of use assets are as follows:

31 Desember/*December 31,* 2024

	Saldo Awal/ *Beginning Balance*	Penambahan/ *Additions/*	Pengurangan/ *Deductions/*	Saldo Akhir/ *Ending Balance*	
Nilai tercatat					*Carrying amount*
Bangunan	582.084	103.113	(118.804)	566.393	*Buildings*
Kendaraan	216.939	52.165	(7.591)	261.513	*Vehicle*
Mesin ATM	-	-	-	-	*ATM Machine*
Lainnya	118	-	(118)	-	*Others*
	799.141	155.278	(126.513)	827.906	
Akumulasi penyusutan					*Accumulated depreciation*
Bangunan	346.417	145.052	(118.805)	372.664	*Buildings*
Kendaraan	129.776	59.445	(7.591)	181.630	*Vehicle*
Mesin ATM	-	-	-	-	*ATM Machine*
Lainnya	117	-	(117)	-	*Others*
	476.310	204.497	(126.513)	554.294	
Nilai Buku Neto	**322.831**			**273.612**	***Net Book Value***

31 Desember/*December 31,* 2023

	Saldo Awal/ *Beginning Balance*	Penambahan/ *Additions/*	Pengurangan/ *Deductions/*	Saldo Akhir/ *Ending Balance*	
Nilai tercatat					*Carrying amount*
Bangunan	565.724	118.767	(102.407)	582.084	*Buildings*
Kendaraan	146.319	87.190	(16.570)	216.939	*Vehicle*
Mesin ATM	7.839	-	(7.839)	-	*ATM Machine*
Lainnya	138	-	(20)	118	*Others*
	720.020	205.957	(126.836)	799.141	
Akumulasi penyusutan					*Accumulated depreciation*
Bangunan	297.729	151.095	(102.407)	346.417	*Buildings*
Kendaraan	72.237	74.108	(16.569)	129.776	*Vehicle*
Mesin ATM	6.196	1.643	(7.839)	-	*ATM Machine*
Lainnya	133	4	(20)	117	*Others*
	376.295	226.850	(126.835)	476.310	
Nilai Buku Neto	**343.725**			**322.831**	***Net Book Value***

14. ASET TETAP (lanjutan)

Nilai tercatat untuk aset hak guna adalah sebagai berikut: (lanjutan)

14. PREMISES AND EQUIPMENT (continued)

The carrying amount of right of use assets are as follows: (continued)

	31 Desember/*December 31,* 2022				
	Saldo Awal/ *Beginning Balance*	**Penambahan/ *Additions/***	**Pengurangan/ *Deductions/***	**Saldo Akhir/ *Ending Balance***	
Nilai tercatat					*Carrying amount*
Bangunan	514.000	137.542	(85.818)	565.724	*Buildings*
Kendaraan	59.433	115.837	(28.951)	146.319	*Vehicle*
Mesin ATM	7.839	-	-	7.839	*ATM Machine*
Lainnya	248	-	(110)	138	*Others*
	581.520	253.379	(114.879)	720.020	
Akumulasi penyusutan					*Accumulated depreciation*
Bangunan	236.048	147.499	(85.818)	297.729	*Buildings*
Kendaraan	47.345	53.843	(28.951)	72.237	*Vehicle*
Mesin ATM	5.074	1.122	-	6.196	*ATM Machine*
Lainnya	193	50	(110)	133	*Others*
	288.660	202.514	(114.879)	376.295	
Nilai Buku Neto	**292.860**			**343.725**	***Net Book Value***

15. BUNGA YANG MASIH AKAN DITERIMA

Akun ini terdiri dari:

15. INTERESTS RECEIVABLES

This account consists of:

	31 Desember/ *December 31,* 2024	**31 Desember/ *December 31,* 2023**	**31 Desember/ *December 31,* 2022**	
Kredit yang diberikan	10.896.436	10.991.199	10.165.322	*Loans*
Obligasi pemerintah	490.258	406.144	385.556	*Government bonds*
Efek-efek dan penempatan pada bank lain	94.997	93.842	170.468	*Securities and placement with other Banks*
Derivatif	36.883	35.502	28.956	*Derivative*
Total	**11.518.574**	**11.526.687**	**10.750.302**	***Total***

16. ASET LAIN-LAIN / *16. OTHER ASSETS*

Akun ini terdiri dari: / *This account consists of:*

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Pihak ketiga				*Third party*
Tagihan kepada pihak ketiga	1.781.884	1.873.496	1.040.048	*Third party receivables*
Biaya dibayar dimuka	985.821	698.200	505.346	*Prepaid expenses*
Uang Muka Pajak				*Prepaid Taxes*
PPh 29 (Catatan 39a)	721.042	-	-	*Article 29 (Note 39a)*
PPh 21	33.053	-	-	*Article 21*
Beban yang ditangguhkan untuk pinjaman karyawan (Catatan 11f)	341.757	400.702	459.549	*Deferred expense for employee loan (Note 11f)*
Agunan yang diambil alih	77.591	77.591	77.591	*Foreclosed collateral*
Lainnya	264.516	185.057	270.228	*Others*
Total	**4.205.664**	**3.235.046**	**2.352.762**	***Total***

Tagihan kepada pihak ketiga merupakan tagihan kepada nasabah dan pihak lainnya seperti tagihan kepada Pemerintah Republik Indonesia (Perumpera), tagihan kepada PT Pos Indonesia (Persero) sehubungan dengan kerja sama penyelenggaraan Tabungan Batara Kantor Pos, serta tagihan kepada PT Artajasa terkait dengan transaksi ATM Bersama, PT Finnet Indonesia atas transaksi ATM Link, PT Alto Network atas transaksi ATM Alto, dan PT Rintis Sejahtera atas transaksi ATM Prima.

Third party receivables represent receivables from customers and other parties such as the receivables from the Government of the Republic of Indonesia, (Perumpera) receivables from PT Pos Indonesia (Persero) regarding collaboration on holding Tabungan Batara Kantor Pos, and receivables from PT Artajasa arising from transactions with ATM Bersama, receivables from PT Finnet Indonesia arising from ATM Link's transactions, receivables from PT Alto Network arising from transaction with ATM Alto, and receivables from PT Rintis Sejahtera arising from transaction with ATM Prima.

Rincian biaya dibayar dimuka terutama terdiri dari biaya sewa dan biaya pemeliharaan gedung dan peralatan kantor.

Details of prepaid expenses consist mainly of rent expenses and building and office furnitures maintenance expenses.

17. LIABILITAS SEGERA / *17. LIABILITIES DUE IMMEDIATELY*

Akun ini terdiri dari: / *This account consists of:*

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Kewajiban kepada pihak ketiga	2.147.228	2.384.802	2.534.231	*Third party payables*
Bagi hasil yang belum dibagikan	87.581	84.951	37.548	*Undistributed profit sharing*
Hutang pajak				*Taxes payable*
Pajak penghasilan				*Income tax*
Pasal 4 ayat (2)	181.728	157.517	122.810	*Article (4) paragraph 2*
Pasal 25	154.348	-	-	*Article 29 (Note 39)*
Pasal 21	10.580	95.946	88.045	*Article 21*
Pasal 29 (Catatan 39a)	-	345.514	347.774	*Article 29 (Note 39a)*
Pajak pertambahan nilai	21.817	90.810	32.567	*Value added tax*
Deposito berjangka jatuh tempo	12.748	90.263	14.058	*Matured time deposits*
Bunga atas deposito berjangka yang belum diambil nasabah	10.597	7.255	2.634	*Interest on time deposits which is not yet collected by customers*
Lainnya	17.795	20.456	25.691	*Others*
Total	**2.644.422**	**3.277.514**	**3.205.358**	***Total***

18. GIRO / *18. DEMAND DEPOSITS*

Akun ini terdiri dari: / *This account consists of:*

	31 Desember/ *December 31,* 2024		31 Desember/ *December 31,* 2023		31 Desember/ *December 31,* 2022		
	Jumlah nosional mata uang asing Notional amount in foreign currencies (angka penuh/ full amount)	Ekuivalen/ *Equivalent* Rupiah	Jumlah nosional mata uang asing/ Notional amount in foreign currencies (angka penuh/ full amount)	Ekuivalen/ Equivalent Rupiah	Jumlah nosional mata uang asing/ *Notional amount in foreign currencies* (angka penuh/ *full amount*)	Ekuivalen/ *Equivalent* Rupiah	
Pihak ketiga							*Third parties*
Rupiah		21.613.002		23.347.492		19.411.404	*Rupiah*
Dolar Amerika Serikat	3.784.587	60.913	793.608	12.219	527.470	8.211	*United States Dollar*
		21.673.915		23.359.71		19.419.615	
Pihak Berelasi (Catatan 44)							*Related parties (Note 44)*
Rupiah		122.895.873		101.003.321		92.304.844	*Rupiah*
Dolar Amerika Serikat	949.523.112	15.282.574	98.007.695	18.445.724	115.706.948	1.801.268	*United States Dollar*
Euro Eropa	3.202.415	53.666		-		-	*Europe Euro*
		138.232.113		119.449.045		94.106.112	
Total		**159.906.028**		**142. 808.756**		**113.525.727**	***Total***

Pada tanggal 31 Desember 2024, 2023 dan 2022, saldo giro termasuk giro yang didasarkan pada prinsip perbankan syariah adalah masing-masing sebesar Rp18.882.766, Rp13.439.465 dan Rp8.624.809.

As of December 31, 2024, 2023 and 2022, demand deposits balance include deposits based on sharia banking principles amounting to Rp18,882,765, Rp13,439,465 and Rp8,624,809, respectively.

Tingkat suku bunga rata-rata untuk giro Rupiah adalah sebesar 1,86%, 2,21% dan 1,59% masing-masing untuk tahun yang berakhir pada tanggal 31 Desember 2024, 2023 dan 2022, dan tingkat suku bunga rata-rata untuk giro dalam mata uang asing adalah sebesar 6,13%, 4,51% dan 1,03% untuk tahun yang berakhir pada tanggal 31 Desember 2024, 2023 dan 2022.

The average annual interest rates for Rupiah demand deposits are 1.86%, 2.21% and 1.59% for the year ended December 31, 2024, 2023, and 2022, respectively, and for foreign currency denominated demand deposits are 6.13%, 4.51% and 1.03% for the year ended December 31, 2024, 2023 and 2022, respectively.

Giro yang digunakan sebagai jaminan atas fasilitas kredit yang diberikan oleh Bank pada tanggal 31 Desember 2024, 2023 dan 2022 masing-masing sebesar Rp450.375, Rp438.578 dan Rp354.287 (Catatan 11).

Demand deposits amounting to Rp450,375, Rp438,578 and Rp354,287 as of December 31, 2024, 2023 and 2022, respectively, are pledged as collateral for loans provided by the Bank (Note 11).

18. GIRO (lanjutan)

Giro simpanan dari nasabah dan wadiah dari pihak-pihak berelasi pada 31 Desember 2024, 2023 dan 2022 masing-masing sebesar Rp138.232.113, Rp119.449.045 dan Rp94.106.112 (Catatan 44).

Pada tahun 2023, telah dilakukan migrasi dana jaminan ke rekening giro escrow per masing-masing pengembang/nasabah sebesar Rp3.044.849. Sebelumnya, dana jaminan ini dicatat pada akun liabilitas lain-lain. Kemudian atas akad kredit baru di akhir tahun 2023, Bank mencatat seluruh dana jaminan pada rekening giro escrow per masing-masing pengembang/nasabah. Pada tanggal 31 Desember 2024 dan 2023, saldo dana jaminan yang terdapat pada rekening masing-masing giro escrow sebesar Rp3.578.332 dan Rp3.738.754.

18. DEMAND DEPOSITS (continued)

As of December 31, 2024, 2023 and 2022, demand deposit and wadiah demand deposits from depositors who are related parties of the bank amounted to Rp138,232,133, Rp119,449,045 and Rp94,106,112 (Note 44).

In 2023, the security deposits were migrated to the escrow demand deposits per each developer amounted to Rp3,044,849. Previously, the security deposits were recorded in other liabilities account. Afterwards, the new credit agreement at the end of 2023, the Bank will record all security deposits in the escrow demand deposits per each developer. As of December 31, 2024 and 2023, the security deposits balance in the escrow demand deposits was amounted to Rp3,578,332 and Rp3,738,754 respectively.

Dana *Syirkah* Temporer - Giro *Mudharabah*

Temporary Syirkah Funds – Current Accounts

a. Berdasarkan jenis produk / *By product*

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Giro BTN Prima iB	941.925	726.061	480.786	*Giro BTN Prima iB*
Total	**941.925**	**726.061**	**480.786**	***Total***

b. Berdasarkan hubungan / *By relationship*

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Pihak Ketiga	929.940	712.587	468.889	*Third Parties*
Pihak Berelasi (Catatan 44)	11.985	13.474	11.897	*Related Party (Note 44)*
Total	**941.925**	**726.061**	**480.786**	***Total***

Nisbah dan tingkat bagi hasil rata-rata untuk giro *Mudharabah* untuk tahun yang berakhir pada 31 Desember 2024, 2023 dan 2022 adalah sebagai berikut:

The average rate of ratio and profit sharing for Mudharabah current accounts for the year ended December 31, 2024, 2023 and 2022 are as follows:

	2024		
	Nisbah* (%)/ *Ratio (%)	**Tingkat bagi hasil (%)/ *Profit sharing rate (%)***	
Giro *Mudharabah*	12,70 : 87,30	1,28%	*Mudharabah current accounts*

18. GIRO (lanjutan)

Dana Syirkah Temporer - Giro Mudharabah (lanjutan)

Nisbah dan tingkat bagi hasil rata-rata untuk giro Mudharabah untuk tahun yang berakhir pada 31 Desember 2024, 2023 dan 2022 adalah sebagai berikut: (lanjutan)

18. DEMAND DEPOSITS (continued)

Temporary Syirkah Funds - Mudharabah Current Accounts (continued)

The average rate of ratio and profit sharing for Mudharabah current accounts for the year ended December 31, 2024, 2023 and 2022 are as follows: (continued)

	2023		
	Nisbah* (%)/ *Ratio (%)	**Tingkat bagi hasil (%)/ *Profit sharing rate (%)***	
Giro *Mudharabah*	12,70 : 87,30	1,28%	*Mudharabah current accounts*

	2022		
	Nisbah* (%)/ *Ratio (%)	**Tingkat bagi hasil (%)/ *Profit sharing rate (%)***	
Giro *Mudharabah*	14 : 86	1,37%	*Mudharabah current accounts*

Pada tanggal 31 Desember 2024, 2023 dan 2022 tidak terdapat giro *mudharabah* yang dijadikan jaminan.

As of December 31, 2024, 2023 and 2022, there are no mudharabah demand deposits which are pledged as collateral.

19. TABUNGAN

19. SAVINGS DEPOSITS

	31 Desember/ *December 31,* 2024		**31 Desember/ *December 31,* 2023**		**31 Desember/ *December 31,* 2022**		
	Jumlah nosional mata uang asing *Notional amount in foreign currencies (angka penuh/ full amount)*	**Ekuivalen/ *Equivalent Rupiah***	**Jumlah nosional mata uang asing/ *Notional amount in foreign currencies (angka penuh/ full amount)***	**Ekuivalen/ *Equivalent Rupiah***	**Jumlah nosional mata uang asing/ *Notional amount in foreign currencies (angka penuh/ full amount)***	**Ekuivalen/ *Equivalent Rupiah***	
Rupiah							*Rupiah*
Tabungan Batara		37.410.000		37.557.013		36.079.683	*Batara savings deposits*
Tabungan Batara *Wadiah*		1.521.932		1.276.592		1.193.718	*Batara Wadiah savings deposit*
		38.931.932		38.833.605		37.273.401	
Dolar Amerika Serikat							*United States Dollar*
Tabungan Batara	10.428.441	167.846	8.712.221	134.142	6.211.491	96.697	*Batara savings deposits*
Dolar Australia							*Australian Dollar*
Tabungan Batara	9.696.070	97.092	1.941.014	20.421	348	4	*Batara savings deposits*
Dolar Singapura							*Singapore Dollar*
Tabungan Batara	1.626.026	19.260	2.655.444	31.006	512.114	5.937	*Batara savings deposits*
Yen Jepang							*Japan Yen*
Tabungan Batara	56.622.416	5.834	2.503.206	8.399	37.082	4	*Batara savings deposits*
Euro Eropa							*European Euro*
Tabungan Batara	4.445	74	-	-	-	-	*Batara savings deposits*
Renminbi							*Renminbi*
Tabungan Batara	19.275	43	6.625	14	1.619	4	*Batara savings deposits*
		290.149		165.148		102.646	
Total		**39.222.081**		**38.998.753**		**37.376.047**	***Total***

19. TABUNGAN (lanjutan)

Pada tanggal 31 Desember 2024, 2023 dan 2022, saldo tabungan termasuk tabungan yang didasarkan pada prinsip perbankan syariah masing-masing sebesar Rp1.521.932, Rp1.276.592 dan Rp1.193.718.

Tingkat suku bunga rata-rata untuk tabungan rupiah sebesar 1,57%, 1,53% dan 1,44% masing-masing untuk tahun yang berakhir pada tanggal 31 Desember 2024, 2023 dan 2022. Tingkat suku bunga rata-rata untuk tabungan valas sebesar 0,27%, 0,21% dan 0,16% masing-masing untuk tahun yang berakhir pada tanggal 31 Desember 2024, 2023 dan 2022.

Tabungan yang digunakan sebagai jaminan atas fasilitas kredit yang diberikan oleh Bank pada tanggal 31 Desember 2024, 2023 dan 2022 masing-masing sebesar Rp728.630, Rp594.105 dan Rp598.326 (Catatan 11).

Tabungan Batara dan *wadiah* dari pihak-pihak berelasi pada tanggal 31 Desember 2024, 2023 dan 2022 masing-masing sebesar Rp923.901, Rp694.298 dan Rp526.282 (Catatan 44).

Dana *Syirkah* Temporer - Tabungan *Mudharabah*

a. Berdasarkan jenis produk

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Rupiah				*Rupiah*
Tabungan BTN Prima iB	6.007.492	5.214.570	4.602.505	*Tabungan BTN Prima iB*
Tabungan BTN Haji & Umroh iB	262.500	245.314	205.866	*Tabungan BTN Haji & Umroh iB*
Tabungan BTN Emas iB	10.454	7.266	6.006	*Tabungan BTN Emas iB*
Tabungan *Qurban* BTN iB	7.334	6.092	4.736	*Tabungan Qurban BTN iB*
Total	**6.287.780**	**5.473.242**	**4.819.113**	***Total***

b. Berdasarkan hubungan

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Pihak Ketiga	6.161.887	5.331.275	4.730.686	*Third Parties*
Pihak Berelasi (Catatan 44)	125.893	141.967	88.427	*Related Party (Note 44)*
Total	**6.287.780**	**5.473.242**	**4.819.113**	***Total***

Tabungan *Mudharabah* merupakan simpanan dana pihak lain yang mendapatkan imbalan bagi hasil dari pendapatan Bank atas penggunaan dana tersebut dengan *nisbah* yang ditetapkan dan disetujui sebelumnya.

19. SAVINGS DEPOSITS (continued)

As of December 31, 2024, 2023 and 2022, savings deposits balance include savings deposits based on sharia banking principles amounted to Rp1,521,932, Rp1,276,592 and Rp1,193,718, respectively.

The average annual interest rates for rupiah savings deposits are 1.57%, 1.53% and 1.44%, for the year ended December 31, 2024, 2023 and 2022, respectively. The average annual interest rates for foreign currencies savings deposits are 0.27%, 0.21% and 0.16%, for the year ended December 31, 2024, 2023 and 2022, respectively.

Savings deposits amounting to Rp728,630, Rp594,105 and Rp598,326 as of December 31, 2024, 2023 and 2022, respectively, are pledged as collateral for loans provided by the Bank to its customers (Note 11).

As of December 31, 2024, 2023 and 2022, Batara and wadiah savings deposits from depositors who are related parties of the Bank amounted to Rp923,901, Rp694,298 and Rp526,282, respectively (Note 44).

Temporary Syirkah Funds - Mudharabah Savings Deposits

a. By product

b. By relationship

Mudharabah savings deposits represent deposits from third parties who receive a share in the revenue derived by the Bank from the use of such funds based on a pre-determined and pre-agreed ratio.

19. TABUNGAN (lanjutan)

Dana *Syirkah* Temporer - Tabungan *Mudharabah* (lanjutan)

Nisbah dan tingkat bagi hasil rata-rata untuk tabungan *Mudharabah* untuk tahun yang berakhir pada 31 Desember 2024, 2023 dan 2022 adalah sebagai berikut:

19. SAVINGS DEPOSITS (continued)

Temporary Syirkah Funds - Mudharabah Savings Deposits (continued)

The average rate of ratio and profit sharing for Mudharabah savings deposits for the year ended December 31, 2024, 2023 and 2022 are as follows:

2024

	Nisbah* (%)/ *Ratio (%)	**Tingkat bagi hasil (%)/ *Profit sharing rate (%)***	
Tabungan BTN Prima iB	34,10 : 65,90	2,87%	*Tabungan BTN Prima iB*
Tabungan BTN Haji & Umroh iB	2 : 98	0,17%	*Tabungan BTN Haji & Umroh iB*
Tabungan *Qurban* BTN iB	15,50 : 84,50	1,30%	*Tabungan Qurban BTN iB*
Tabungan BTN Emas iB	25 : 75	2,10%	*Tabungan BTN Emas iB*

2023

	Nisbah* (%)/ *Ratio (%)	**Tingkat bagi hasil (%)/ *Profit sharing rate (%)***	
Tabungan BTN Prima iB	34,10 : 65,90	3,42%	*Tabungan BTN Prima iB*
Tabungan BTN Haji & Umroh iB	2 : 98	0,20%	*Tabungan BTN Haji & Umroh iB*
Tabungan *Qurban* BTN iB	15,50 : 84,50	1,55%	*Tabungan Qurban BTN iB*
Tabungan BTN Emas iB	25 : 75	2,50%	*Tabungan BTN Emas iB*

2022

	Nisbah* (%)/ *Ratio (%)	**Tingkat bagi hasil (%)/ *Profit sharing rate (%)***	
Tabungan BTN Prima iB	10,50 : 89,50	1,03%	*Tabungan BTN Prima iB*
Tabungan BTN Haji & Umroh iB	15,50 : 84,50	1,52%	*Tabungan BTN Haji & Umroh iB*
Tabungan *Qurban* BTN iB	15,50 : 84,50	1,52%	*Tabungan Qurban BTN iB*
Tabungan BTN Emas iB	25 : 75	2,44%	*Tabungan BTN Emas iB*

20. DEPOSITO BERJANGKA / *20. TIME DEPOSITS*

a. Tingkat suku bunga rata-rata per tahun untuk deposito berjangka adalah sebagai berikut:

a. Average annual interest rates for time deposits are as follows:

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Rupiah				*Rupiah*
1 bulan	3,58%	4,19%	2,86%	*1 month*
3 bulan	5,50%	4,93%	3,13%	*3 months*
6 bulan	5,57%	4,71%	3,13%	*6 months*
12 bulan	3,28%	3,59%	3,03%	*12 months*
24 bulan	2,83%	4,96%	4,51%	*24 months*
Mata uang asing	2,65%	4,25%	0,36%	*Foreign currencies*

b. Rincian deposito berjangka berdasarkan mata uang dan jangka waktu kontrak:

b. The details of time deposits by currency and contract period are as follows:

	31 Desember/ *December 31,* 2024		31 Desember/ *December 31,* 2023		31 Desember/ *December 31,* 2022		
	Jumlah nosional mata uang asing *Notional amount in foreign currencies (angka penuh/ full amount)*	Ekuivalen/ *Equivalent Rupiah*	Jumlah nosional mata uang asing/ *Notional amount in foreign currencies (angka penuh/ full amount)*	Ekuivalen/ *Equivalent Rupiah*	Jumlah nosional mata uang asing/ *Notional amount in foreign currencies (angka penuh/ full amount)*	Ekuivalen/ *Equivalent Rupiah*	
Rupiah							*Rupiah*
1 bulan		43.540.540		42.852.585		49.859.586	*1 month*
3 bulan		66.320.320		53.384.291		49.971.583	*3 months*
6 bulan		33.843.069		19.375.655		23.370.744	*6 months*
12 bulan		3.585.531		18.032.209		10.416.465	*12 months*
24 bulan		48.252		285.408		11.553.056	*24 months*
		147.337.712		133.930.148		145.171.434	
Dolar Amerika Serikat							*United States Dollar*
1 bulan	102.582.998	1.651.073	56.059.161	863.143	2.448.639	38.119	*1 month*
3 bulan	262.208.207	4.220.241	244.021.914	3.757.205	56.778.006	883.892	*3 months*
6 bulan	5.076.257	81.702	137.882.149	2.122.971	5.083.726	79.141	*6 months*
12 bulan	183.065	2.946	287.521	4.427	473.642	7.373	*12 months*
24 bulan	1.000	16	-	-	-	-	*12 months*
		5.955.978		6.747.746		1.008.525	
Dolar Singapura							*Singapore Dollar*
1 bulan	123.716	1.465	186.901	2.182	104.900	1.216	*1 months*
3 bulan	1.173.618	13.901	1.161.570	13.563	453.603	5.259	*3 months*
6 bulan	-			1.000.000		11.593	*6 months*
		15.366		15.745		18.068	
Renminbi							*Renminbi*
1 bulan		-	-	-	-	-	*1 months*
3 bulan		-	-	-	-	-	*3 months*
6 bulan	143.036	315	-	-	-	-	*6 months*
		315		15.745		18.068	
Total		**153.309.371**		**140.693.639**		**146.198.027**	***Total***

20. DEPOSITO BERJANGKA (lanjutan)

c. Rincian deposito berjangka berdasarkan mata uang dan sisa umur hingga jatuh tempo:

20. TIME DEPOSITS (continued)

c. Details of time deposits by currency and remaining period to maturity are as follows:

	31 Desember/ *December 31,* 2024		31 Desember/ *December 31,* 2023		31 Desember/ *December 31,* 2022		
	Jumlah nosional mata uang asing/ *Notional amount in foreign currencies (angka penuh/ full amount)*	Ekuivalen/ *Equivalent Rupiah*	Jumlah nosional mata uang asing/ *Notional amount in foreign currencies (angka penuh/ full amount)*	Ekuivalen/ *Equivalent Rupiah*	Jumlah nosional mata uang asing/ *Notional amount in foreign currencies (angka penuh/ full amount)*	Ekuivalen/ *Equivalent Rupiah*	
Rupiah							*Rupiah*
≤ 1 bulan		72.097.219		85.190.601		66.439.113	*≤ 1 month*
> 1 bulan ≤ 3 bulan		46.512.423		29.134.976		37.434.888	*> 1 month ≤ 3 months*
> 3 bulan ≤ 6 bulan		25.146.713		9.635.943		20.558.238	*> 3 months ≤ 6 months*
> 6 bulan ≤ 12 bulan		3.481.815		9.921.401		9.195.878	*> 6 months ≤ 12 months*
> 12 bulan ≤ 24 bulan		99.541		47.227		11.543.318	*> 12 months ≤ 24 months*
		147.337.711		133.930.148		145.171.435	
Dolar Amerika Serikat							*United States Dollar*
≤ 1 bulan		1.822.992		4.997.452		186.307	*≤ 1 month*
> 1 bulan ≤ 3 bulan		4.122.897		906.749		811.341	*> 1 month ≤ 3 months*
> 3 bulan ≤ 6 bulan		8.569		448.970		8.037	*> 3 months ≤ 6 months*
> 6 bulan ≤ 12 bulan		1.505		394.575		2.840	*> 6 months ≤ 12 months*
> 12 bulan ≤ 24 bulan		16		-		-	*> 12 months ≤ 24 months*
		5.955.979		6.747.746		1.008.525	
Dolar Singapura							*Singapore Dollar*
≤ 1 bulan		1.465		3.596		1.216	*≤ 1 month*
> 1 bulan ≤ 3 bulan		6.060		12.149		11.055	*> 1 month ≤ 3 months*
> 3 bulan ≤ 6 bulan		7.841		-		5.796	*> 1 month ≤ 3 months*
		15.366		15.745		18.067	
Renminbi							*United States Dollar*
≤ 1 bulan		315		-		-	*≤ 1 month*
		315		-		-	
Total		**153.309.371**		**140.693.639**		**146.198.027**	***Total***

Deposito berjangka yang dijadikan jaminan atas fasilitas kredit yang diberikan oleh Bank kepada konsumennya pada tanggal 31 Desember 2024, 2023 dan 2022 masing-masing sebesar Rp906.630, Rp704.548 dan Rp1.040.402 (Catatan 11).

As of December 31, 2024, 2023 and 2022, time deposits amounting to Rp906,630, Rp704,548 and Rp1,040,402, respectively, are pledged as collateral for loans provided by the Bank to its customers (Note 11).

Deposito berjangka dari pihak-pihak berelasi pada tanggal 31 Desember 2024, 2023 dan 2022 masing-masing sebesar Rp76.636.682, Rp76.717.583 dan Rp79.389.842 (Catatan 44).

As of December 31, 2024, 2023 and 2022, time deposits from depositors who are related parties of the Bank amounted to Rp76.636.682, Rp76,717,583 and Rp79,389,842, respectively (Note 44).

Dana *Syirkah* Temporer - Deposito *Mudharabah*

Temporary Syirkah Funds - Mudharabah Time Deposits

a. Berdasarkan jangka waktu kontrak

a. By contractual period

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
1 bulan	7.503.550	7.144.730	10.306.290	*1 month*
3 bulan	11.437.586	8.653.688	5.096.193	*3 months*
6 bulan	3.002.351	3.245.297	4.060.838	*6 months*
12 bulan	42.695	1.833.604	58.587	*12 months*
24 bulan	885	6.238	1.649	*24 months*
Total	**21.987.067**	**20.883.557**	**19.523.557**	***Total***

20. DEPOSITO BERJANGKA (lanjutan)

Dana *Syirkah* Temporer - Deposito *Mudharabah* (lanjutan)

b. Berdasarkan sisa umur jatuh tempo

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
≤ 1 bulan	7.503.550	7.144.730	12.300.037	*≤ 1 month*
> 1 bulan ≤ 3 bulan	11.437.586	8.653.688	3.169.127	*> 1 month ≤ 3 months*
> 3 bulan ≤ 6 bulan	3.002.351	3.245.297	4.025.968	*> 3 months ≤ 6 months*
> 6 bulan ≤ 12 bulan	42.695	1.833.604	27.682	*> 6 months ≤ 12 months*
> 12 bulan ≤ 24 bulan	885	6.238	743	*> 12 months ≤ 24 months*
Total	**21.987.067**	**20.883.557**	**19.523.557**	***Total***

c. Berdasarkan hubungan

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Pihak Ketiga	15.129.659	11.975.188	11.886.366	*Third Parties*
Pihak Berelasi (Catatan 44)	6.857.408	8.908.369	7.637.191	*Related Party (Note 44)*
Total	**21.987.067**	**20.883.557**	**19.523.557**	***Total***

Deposito *mudharabah* merupakan investasi pihak lain yang mendapatkan imbalan bagi hasil dari pendapatan atas penggunaan dana tersebut dengan *nisbah* yang ditetapkan dan disetujui sebelumnya.

Nisbah dan tingkat bagi hasil rata-rata untuk deposito mudharabah untuk tahun yang berakhir pada tanggal 31 Desember 2024, 2023 dan 2022 adalah sebagai berikut:

	31 Desember/ *December 31,* 2024		31 Desember/ *December 31,* 2023		31 Desember/ *December 31,* 2022		
	Tingkat bagi hasil (%)/ Nisbah (%)/ Ratio (%)	Profit sharing Ratio (%)	Tingkat bagi hasil (%)/ Nisbah (%)/ Ratio (%)	Profit sharing rate (%)	Tingkat bagi hasil (%)/ Nisbah (%)/ Ratio (%)	Profit sharing rate (%)	
1 bulan	29,50 : 70,50	2,48%	29,50 : 70,50	2,95%	29,50 : 70,50	2,88%	*1 month*
3 bulan	29,50 : 70,50	2,48%	29,50 : 70,50	2,95%	29,50 : 70,50	2,88%	*3 months*
6 bulan	29,50 : 70,50	2,48%	29,50 : 70,50	2,95%	29,50 : 70,50	2,88%	*6 months*
12 bulan	29,50 : 70,50	2,48%	29,50 : 70,50	2,95%	29,50 : 70,50	2,88%	*12 months*
24 bulan	29,50 : 70,50	2,48%	29,50 : 70,50	2,95%	39 : 61	3,81%	*24 months*

Pada tanggal 31 Desember 2024, 2023 dan 2022 tidak terdapat deposito *mudharabah* yang dijadikan jaminan.

20. TIME DEPOSITS (continued)

Temporary Syirkah Funds - Mudharabah Time Deposits (continued)

b. By remaining period to maturity

c. By relationship

Mudharabah time deposits represent investment from other parties who receive share in the income derived from the use of such funds based on a predetermined and pre-agreed ratio.

The average rate of ratio and profit sharing for mudharabah time deposits for the year ended December 31, 2024, 2023 and 2022, are as follows:

As of December 31, 2024, 2023 and 2022, there are no mudharabah time deposits which are pledged as collateral.

21. SIMPANAN DARI BANK LAIN / *21. DEPOSITS FROM OTHER BANKS*

Tingkat suku bunga rata-rata per tahun untuk simpanan dari bank lain adalah sebagai berikut:

Average annual interest rates for deposits from other banks are as follows:

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Giro	0,95%	1,12%	0,99%	*Demand Deposit*
Deposito	5,02%	4,69%	2,75%	*Time Deposits*
Inter-bank call money	6,20%	5,65%	3,40%	*Inter-bank call money*

Rincian simpanan dari bank lain berdasarkan sisa umur sampai dengan saat jatuh tempo adalah sebagai berikut:

Details of deposits from other banks by remaining period to maturity are as follows:

	31 Desember/*December 31,* 2024					
	≤ 1 bulan/ *month*	> 1 - 3 bulan/ *months*	> 3 - 6 bulan/ *months*	> 6 - 12 bulan/ *months*	Total	
Rupiah						*Rupiah*
Giro	70.035	-	-	-	**70.035**	*Demand deposits*
Total	**70.035**	**-**	**-**	**-**	**70.035**	***Total***

	31 Desember/*December 31,* 2023					
	≤ 1 bulan/ *month*	> 1 - 3 bulan/ *months*	> 3 - 6 bulan/ *months*	> 6 - 12 bulan/ *months*	Total	
Rupiah						*Rupiah*
Giro	91.312	-	-	-	91.312	*Demand deposits*
Total	**91.312**	**-**	**-**	**-**	**91.312**	***Total***

	31 Desember/*December 31,* 2022					
	≤ 1 bulan/ *month*	> 1 - 3 bulan/ *months*	> 3 - 6 bulan/ *months*	> 6 - 12 bulan/ *months*	Total	
Rupiah						*Rupiah*
Giro	136.408	-	-	-	136.408	*Demand deposits*
Total	**136.408**	**-**	**-**	**-**	**136.408**	***Total***

Simpanan dari bank lain yang termasuk pihak-pihak berelasi pada 31 Desember 2024, 2023 dan 2022 masing-masing sebesar RpNihil.

As of December 31, 2024, 2023 and 2022, deposits from other banks which are related parties of the Bank amounted to RpNil, respectively.

Pada tanggal 31 Desember 2024, 2023 dan 2022, tidak terdapat simpanan dari bank lain yang dijadikan jaminan.

As of December 31, 2024, 2023 and 2022, there are no deposits from other banks which are pledged as collateral.

Dana *Syirkah* Temporer - Simpanan Dari Bank Lain

Temporary Syirkah Funds - Deposits From Other Banks

Akun ini terdiri dari:

This account consists of:

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Pihak Ketiga				*Third Parties*
Rupiah				*Rupiah*
Tabungan *Mudharabah*	21.730	14.781	19.674	*Mudharabah Saving deposits*
Giro *Mudharabah*	9.214	4.154	56	*Mudharabah Current accounts*
Deposito berjangka *Mudharabah*	300	4.300	19.089	*Mudharabah Time deposits*
Total	**31.244**	**23.235**	**38.819**	***Total***

21. SIMPANAN DARI BANK LAIN (lanjutan)

Dana *Syirkah* Temporer - Simpanan Dari Bank Lain (lanjutan)

Simpanan bank lain berdasarkan dana *syirkah* temporer yang termasuk pihak-pihak berelasi pada tanggal 31 Desember 2024, 2023 dan 2022 masing-masing sebesar RpNihil.

Tabungan dan giro *Mudharabah* merupakan simpanan dana pihak lain yang mendapatkan imbalan bagi hasil dari pendapatan Bank atas penggunaan dana tersebut dengan nisbah yang ditetapkan dan disetujui sebelumnya.

Deposito *Mudharabah* merupakan investasi pihak lain yang mendapatkan imbalan bagi hasil dari pendapatan atas penggunaan dana tersebut dengan nisbah yang ditetapkan dan disetujui sebelumnya.

Berdasarkan tingkat suku bunga dan bagi hasil per tahun:

21. DEPOSITS FROM OTHER BANKS (continued)

Temporary Syirkah Funds - Deposits From Other Banks (continued)

Deposits from other banks based on temporary syirkah funds which are related parties of the Bank as of December 31, 2024, 2023 and 2022 amounted to RpNil, respectively.

Mudharabah savings deposits and current account represent deposits from third parties who receive a share in the revenue earned by the Bank from the use of such funds based on a pre-determined and pre-agreed ratio.

Mudharabah time deposits represent investment from other parties who receive share in the income derived from the use of such funds based on a predetermined and pre-agreed ratio.

By annual interest rates and profit sharing:

	31 Desember/ *December 31,* 2024	**31 Desember/ *December 31,* 2023**	**31 Desember/ *December 31,* 2022**	
Giro mudharabah	0.85%	1,28%	1,37%	*Mudharabah demand deposits*
Tabungan mudharabah	1.00%	3,42%	1,03%	*Mudharabah saving deposits*
Deposito berjangka mudharabah	2.48%	2,95%	2,88%	*MudharabahTime deposits*

Pada tanggal 31 Desember 2024, 2023 dan 2022, tidak terdapat simpanan dari bank lain *mudharabah* yang dijadikan jaminan.

As of December 31, 2024, 2023 and 2022, there are no mudharabah deposits from other banks which are pledged as collateral.

22. EFEK-EFEK YANG DIJUAL DENGAN JANJI DIBELI KEMBALI

Rincian efek-efek yang dijual dengan janji dibeli Kembali adalah sebagai berikut:

22. SECURITIES SELL UNDER AGREEMENT TO REPURCHASED

The details of securities sold under repurchase agreements with third parties are as follows:

31 Desember/*December 31,* 2024

Nasabah/ *Customer*	**Jenis Surat Berharga/ *Type of Securities***	**Suku Bunga/ *Interest rate***	**Nilai Nominal/ *Nominal Amount***	**Tanggal Dimulai/ *Commencement Date***	**Tanggal Pembelian Kembali/ *Repurchase Date***	**Harga Pembelian Kembali/ *Repurchase Price***	**yang Belum Diamortisasi/ *Unamortized Interest Expense***	***Nilai* Tercatat/ *Carrying Value***
Pihak Ketiga/*Third parties*								
Hongkong and Shanghai Banking Corporation	FR0104	6,35%	60.000	31 Desember/ *December 31,* 2024	7 Januari/ *January 7,* 2025	55.969	59	55.910
Bank Indonesia	FR0056	6,25%	1.000.000	31 Desember/ *December 31,* 2024	7 Januari/ *January 7,* 2025	996.394	1.037	995.358
Bank Indonesia	FR0059	6,25%	1.000.000	31 Desember/ *December 31,* 2024	7 Januari/ *January 7,* 2025	958.719	997	957.721
National nobu Bank	IDSR140525364S	6,20%	300.000	31 Desember/ *December 31,* 2024	2 Januari/ *January 2,* 2025	291.930	50	291.880
Bank Pembangunan Sulut Gorontalo	IDSR300525364S	6,20%	150.000	31 Desember/ *December 31,* 2024	2 Januari/ *January 2,* 2025	145.540	25	145.515
Pihak Berelasi/*Related parties*								
PT Bank Rakyat Indonesia	IDSR110625364S	6,15%	500.000	31 Desember/ *December 31,* 2024	2 Januari/ *January 2,* 2025	484.192	83	484.109
PT Bank Rakyat Indonesia	IDSR080825364S	6,15%	500.000	31 Desember/ *December 31,* 2024	2 Januari/ *January 2,* 2025	479.015	82	478.933
Total			**3.510.000**			**3.411.759**	**2.333**	**3.409.426**

23. LIABILITAS AKSEPTASI / *23. ACCEPTANCES PAYABLE*

Rincian liabilitas akseptasi kepada nasabah adalah sebagai berikut:

The details of acceptances payable from customers are as follows:

a. Berdasarkan Jenis dan Mata Uang / *a. By Type and Currency*

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Rupiah				*Rupiah*
Pihak ketiga				*Third Parties*
Surat Kredit Berdokumen Dalam Negeri (SKBDN)	251.423	320.522	294.876	*Domestic Document Letter of Credit*
Letter of Credit	-	-	7.161	*Letter of Credit*
Pihak berelasi (Catatan 44)				*Related parties (Note 44)*
Surat Kredit Berdokumen Dalam Negeri (SKBDN)	690.475	224.045	118.525	*Domestic Document Letter of Credit*
Total	**941.898**	**544.567**	**420.562**	***Total***

b. Berdasarkan Jangka Waktu: / *b. By Period*

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
≤ 1 bulan	96.814	362.394	80.697	*≤ 1 month*
> 1 bulan - 3 bulan	724.495	27.223	49.568	*> 1 month - 3 months*
> 3 bulan - 1 tahun	120.589	154.950	290.297	*> 3 months - 1 year*
Total	**941.898**	**544.567**	**420.562**	***Total***

24. SURAT-SURAT BERHARGA YANG DITERBITKAN / *24. SECURITIES ISSUED*

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Rupiah				*Rupiah*
Long Term Note Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2021 Tahap I				*Long Term Notes Through Private Placement Bank Tabungan Negara 2021 Phase I*
Pihak berelasi (Catatan 44)	8.214	8.872	9.529	*Related parties (Note 44)*
Long Term Note II Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2022 Seri A				*Long Term Notes II Through Private Placement Bank Tabungan Negara 2022 Series A*
Pihak berelasi (Catatan 44)	40.202	43.552	46.903	*Related parties (Note 44)*
Long Term Note II Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2022 Seri B				*Long Term Notes II Through Private Placement Bank Tabungan Negara 2022 Series B*
Pihak berelasi (Catatan 44)	67.270	72.652	78.033	*Related parties (Note 44)*
Long Term Note III Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2022 Tahap I				*Long Term Notes III Through Private Placement Bank Tabungan Negara 2022 Phase I*
Pihak berelasi (Catatan 44)	181.781	196.324	210.866	*Related parties (Note 44)*
Long Term Note III Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2022 Tahap II				*Long Term Notes III Through Private Placement Bank Tabungan Negara 2022 Phase II*
Pihak berelasi (Catatan 44)	112.773	121.979	131.185	*Related parties (Note 44)*
Long Term Note IV Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2023 Tahap I				*Long Term Notes IV Through Private Placement Bank Tabungan Negara 2023 Phase I*
Pihak berelasi (Catatan 44)	32.635	35.245	-	*Related parties (Note 44)*
Long Term Note IV Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2023 Tahap II				*Long Term Notes IV Through Private Placement Bank Tabungan Negara 2023 Phase II*
Pihak berelasi (Catatan 44)	368.607	397.517	-	*Related parties (Note 44)*

24. SURAT-SURAT BERHARGA YANG DITERBITKAN (lanjutan)

24. SECURITIES ISSUED (continued)

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Rupiah (lanjutan)				*Rupiah (continued)*
Long Term Note IV Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2023 Tahap III Seri A				*Long Term Notes IV Through Private Placement Bank Tabungan Negara 2023 Phase III Series A*
Pihak berelasi (Catatan 44)	5.826	6.242	-	*Related parties (Note 44)*
Long Term Note IV Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2023 Tahap III Seri B				*Long Term Notes IV Through Private Placement Bank Tabungan Negara 2023 Phase III Series B*
Pihak berelasi (Catatan 44)	217.789	234.542	-	*Related parties (Note 44)*
Long Term Note IV Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2024 Tahap IV				*Long Term Notes IV Through Private Placement Bank Tabungan Negara 2024 Phase IV*
Pihak berelasi (Catatan 44)	196.216	-	-	*Related parties (Note 44)*
Long Term Note IV Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2024 Tahap V				*Long Term Notes IV Through Private Placement Bank Tabungan Negara 2024 Phase V*
Pihak berelasi (Catatan 44)	307.193	-	-	*Related parties (Note 44)*
Long Term Note IV Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2024 Tahap VI		-		*Long Term Notes IV Through Private Placement Bank Tabungan Negara 2024 Phase VI*
Pihak berelasi (Catatan 44)	147.909		-	*Related parties (Note 44)*
Sukuk Mudharabah Bank Tabungan Negara Tahun 2023 Tahap I				*Sukuk Mudharabah Bank Tabungan Negara 2023 Phase I*
Pihak berelasi (Catatan 44)	83.822	90.807	-	*Related parties (Note 44)*
Sukuk Mudharabah Bank Tabungan Negara Tahun 2023 Tahap II				*Sukuk Mudharabah Bank Tabungan Negara 2023 Phase II*
Pihak berelasi (Catatan 44)	161.574	175.039	-	*Related parties (Note 44)*
Sukuk Mudharabah Bank Tabungan Negara Tahun 2024 Tahap III				*Sukuk Mudharabah Bank Tabungan Negara 2024 Phase III*
Pihak berelasi (Catatan 44)	79.428		-	*Related parties (Note 44)*
Sukuk Mudharabah Bank Tabungan Negara Tahun 2024 Tahap IV				*Sukuk Mudharabah Bank Tabungan Negara 2024 Phase IV*
Pihak berelasi (Catatan 44)	52.444	-	-	*Related parties (Note 44)*
Obligasi Berkelanjutan IV Tahap I setelah dikurangi biaya emisi yang belum diamortisasi masing-masing sebesar Rp97, Rp310 dan Rp1.366 pada tanggal 31 Desember 2024 2023 dan 2022				*Continuing Bonds IV Phase I net of unamortized issuance cost amounted to Rp97, Rp310 and Rp1,366 as of December 31,2024 2023 and 2022, respectively*
Pihak ketiga	68.966	80.872	508.247	*Third parties*
Pihak berelasi (Catatan 44)	126.937	114.818	413.387	*Related parties (Note 44)*
Obligasi Berkelanjutan IV Tahap II setelah dikurangi biaya emisi yang belum diamortisasi masing-masing sebesar Rp633, Rp1.274 dan Rp1.909 pada tanggal 31 Desember 2024 2023 dan 2022				*Continuing Bonds IV Phase II net of unamortized issuance cost amounted to Rp633, Rp1,274 and Rp1,909 as of December 31, 2024, 2023 and 2022, respectively*
Pihak ketiga	536.660	627.200	748.568	*Third parties*
Pihak berelasi (Catatan 44)	462.707	371.526	249.523	*Related parties (Note 44)*
Obligasi Berkelanjutan III Tahap II setelah dikurangi biaya emisi yang belum diamortisasi masing-masing sebesar RpNihil, Rp127 dan Rp604 pada tanggal 31 Desember 2024 2023 dan 2022				*Continuing Bonds III Phase II net of unamortized issuance cost amounted to RpNil, Rp127 and Rp604 as of December 31, 2024, 2023 and 2022, respectively*
Pihak ketiga	-	279.470	454.275	*Third parties*
Pihak berelasi (Catatan 44)	-	939.903	764.621	*Related parties (Note 44)*

24. SURAT-SURAT BERHARGA YANG DITERBITKAN (lanjutan)

24. SECURITIES ISSUED (continued)

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Rupiah (lanjutan)				*Rupiah (continued)*
Obligasi Berkelanjutan III Tahap I setelah dikurangi biaya emisi yang belum diamortisasi masing-masing sebesar Rp460, Rp743 dan Rp1.298 pada tanggal 31 Desember 2024 2023 dan 2022				*Continuing Bonds III Phase I net of unamortized issuance cost amounted to Rp460, Rp743 and Rp1,298 as of December 31, 2024, 2023 and 2022, respectively*
Pihak ketiga	208.431	274.409	791.541	*Third parties*
Pihak berelasi (Catatan 44)	1.177.109	1.963.848	1.446.161	*Related parties (Note 44)*
Obligasi Berkelanjutan II Tahap I setelah dikurangi biaya emisi yang belum diamortisasi masing-masing sebesar Rp30, Rp170 dan Rp497 pada tanggal 31 Desember 2024 2023 dan 2022				*Continuing Bonds II Phase I net of unamortized issuance cost amounted to Rp30, Rp170 and Rp497 as of December 31, 2024, 2023 and 2022, respectively*
Pihak ketiga	30.001	29.994	182.886	*Third parties*
Pihak berelasi (Catatan 44)	770.030	769.837	616.616	*Related parties (Note 44)*
Obligasi Berkelanjutan I Tahap II setelah dikurangi biaya emisi yang belum diamortisasi masing-masing sebesar RpNihil, RpNihil dan Rp81 pada tanggal 31 Desember 2024 2023 dan 2022				*Continuing Bonds I Phase II net of unamortized issuance cost amounted to RpNil, RpNil and Rp81 as of December 31, 2024, 2023 and 2022, respectively*
Pihak ketiga	-	-	1.611.735	*Third parties*
Pihak berelasi (Catatan 44)	-	-	388.184	*Related parties (Note 44)*
Negotiable Certificate of Deposits (NCD) setelah dikurangi diskonto masing-masing sebesar RpNihil, Rp62.549, RpNihil, pada tanggal 31 Desember 2024, 2023 dan 2022				*Negotiable Certificate of Deposits (NCD) net of discounts amounted to RpNil, Rp62.549, RpNil as of December 31, 2024, 2023 and 2022, respectively*
Pihak ketiga	-	1.111.628	-	*Third parties*
Pihak berelasi (Catatan 44)	-	325.822	-	*Related parties (Note 44)*
Total	**5.444.524**	**8.272.098**	**8.652.260**	***Total***

24. SURAT-SURAT BERHARGA YANG DITERBITKAN (lanjutan)

i. *Long Term Note* Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2021 Tahap I

Bank menerbitkan *Long Term Note (LTN)* Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2021 Tahap I dengan jumlah nilai nominal sebesar Rp10.186. LTN tersebut diterbitkan senilai 100% dari nilai nominalnya dengan tingkat bunga tetap tahunan sebesar 1,37% yang dibayarkan tiap tiga bulanan berikut amortisasi pokok dan akan jatuh tempo pada tanggal 17 Juni 2037. PT Kustodian Sentral Efek Indonesia (KSEI) bertindak sebagai agen pembayaran. *LTN* ini tidak dilakukan pemeringkatan.

Penerimaan bersih dari penerbitan *LTN* tersebut digunakan untuk penyaluran pembiayaan Tabungan Perumahan Rakyat (Tapera).

ii. *Long Term Note* II Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2022 Seri A

Bank menerbitkan *Long Term Note (LTN)* Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2022 dengan jumlah nilai nominal sebesar Rp47.740. *LTN* tersebut diterbitkan senilai 100% dari nilai nominalnya dengan tingkat bunga tetap tahunan sebesar 1,37% yang dibayarkan tiap tiga bulanan berikut amortisasi pokok dan akan jatuh tempo pada tanggal 12 Oktober 2036. PT Kustodian Sentral Efek Indonesia (KSEI) bertindak sebagai agen pembayaran. *LTN* ini tidak dilakukan pemeringkatan.

Penerimaan bersih dari penerbitan *LTN* tersebut digunakan untuk penyaluran pembiayaan Tabungan Perumahan Rakyat (Tapera).

24. SECURITIES ISSUED (continued)

i. Long Term Notes Through Private Placement Bank Tabungan Negara 2021 Phase I

The Bank issued Long Term Notes (LTN) Bank Tabungan Negara Through Private Placement Year 2021 Phase I with a total nominal value of Rp10,186. Such LTN were issued at 100% of their nominal value with an annual fixed interest rate of 1.37%, payable every three months with amortized principal and will mature on June 17, 2037. The payment agent for LTN is PT Kustodian Sentral Efek Indonesia (KSEI). LTN were not rated.

The net proceeds from the issuance of the bonds were used to finance Tabungan Perumahan Rakyat (Tapera) loans.

ii. Long Term Notes II Through Private Placement Bank Tabungan Negara 2022 Series A

The Bank issued Long Term Notes (LTN) Bank Tabungan Negara Through Private Placement Year 2022 with a total nominal value of Rp47,740. Such LTN were issued at 100% of their nominal value with an annual fixed interest rate of 1.37%, payable every three months with amortized principal and will mature on October 12, 2036. The payment agent for LTN is PT Kustodian Sentral Efek Indonesia (KSEI). LTN were not rated.

The net proceeds from the issuance of the bonds were used to finance Tabungan Perumahan Rakyat (Tapera) loans.

24. SURAT-SURAT BERHARGA YANG DITERBITKAN (lanjutan)

iii. *Long Term Note* II Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2022 Seri B

Bank menerbitkan *Long Term Note (LTN)* Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2022 dengan jumlah nilai nominal sebesar Rp79.379. *LTN* tersebut diterbitkan senilai 100% dari nilai nominalnya dengan tingkat bunga tetap tahunan sebesar 0,55% yang dibayarkan tiap tiga bulanan berikut amortisasi pokok dan akan jatuh tempo pada tanggal 12 April 2037. PT Kustodian Sentral Efek Indonesia (KSEI) bertindak sebagai agen pembayaran. *LTN* ini tidak dilakukan pemeringkatan.

Penerimaan bersih dari penerbitan *LTN* tersebut digunakan untuk penyaluran pembiayaan Tabungan Perumahan Rakyat (Tapera).

iv. *Long Term Note III* Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2022 Tahap I

Bank menerbitkan *Long Term Note (LTN)* Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2022 dengan jumlah nilai nominal sebesar Rp210.866. *LTN* tersebut diterbitkan senilai 100% dari nilai nominalnya dengan tingkat bunga tetap tahunan sebesar 0,55% yang dibayarkan tiap tiga bulanan berikut amortisasi pokok dan akan jatuh tempo pada tanggal 14 Juni 2037. PT Kustodian Sentral Efek Indonesia (KSEI) bertindak sebagai agen pembayaran. *LTN* ini tidak dilakukan pemeringkatan.

Penerimaan bersih dari penerbitan *LTN* tersebut digunakan untuk penyaluran pembiayaan Tabungan Perumahan Rakyat (Tapera).

24. SECURITIES ISSUED (continued)

iii. Long Term Notes II Through Private Placement Bank Tabungan Negara 2022 Series B

The Bank issued Long Term Notes (LTN) Bank Tabungan Negara Through Private Placement Year 2022 with a total nominal value of Rp79,379. Such LTN were issued at 100% of their nominal value with an annual fixed interest rate of 0.55%, payable every three months with amortized principal and will mature on April 12, 2037. The payment agent for LTN is PT Kustodian Sentral Efek Indonesia (KSEI). LTN were not rated.

The net proceeds from the issuance of the bonds were used to finance Tabungan Perumahan Rakyat (Tapera) loans.

iv. Long Term Notes III Through Private Placement Bank Tabungan Negara 2022 Phase I

The Bank issued Long Term Notes (LTN) Bank Tabungan Negara Through Private Placement Year 2022 with a total nominal value of Rp210,866. Such LTN were issued at 100% of their nominal value with an annual fixed interest rate of 0.55%, payable every three months with amortized principal and will mature on June 14, 2037. The payment agent for LTN is PT Kustodian Sentral Efek Indonesia (KSEI). LTN were not rated.

The net proceeds from the issuance of the bonds were used to finance Tabungan Perumahan Rakyat (Tapera) loans.

24. SURAT-SURAT BERHARGA YANG DITERBITKAN (lanjutan)

v. *Long Term Note* III Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2022 Tahap II

Bank menerbitkan *Long Term Note (LTN)* Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2022 dengan jumlah nilai nominal sebesar Rp131.185. *LTN* tersebut diterbitkan senilai 100% dari nilai nominalnya dengan tingkat bunga tetap tahunan sebesar 0,55% yang dibayarkan tiap tiga bulanan berikut amortisasi pokok dan akan jatuh tempo pada tanggal 28 Maret 2037. PT Kustodian Sentral Efek Indonesia (KSEI) bertindak sebagai agen pembayaran. *LTN* ini tidak dilakukan pemeringkatan.

Penerimaan bersih dari penerbitan *LTN* tersebut digunakan untuk penyaluran pembiayaan Tabungan Perumahan Rakyat (Tapera).

vi. *Long Term Note* IV Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2023 Tahap I

Bank menerbitkan *Long Term Note (LTN)* Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2023 dengan jumlah nilai nominal sebesar Rp35.898. *LTN* tersebut diterbitkan senilai 100% dari nilai nominalnya dengan tingkat bunga tetap tahunan sebesar 0,55% yang dibayarkan tiap tiga bulanan berikut amortisasi pokok dan akan jatuh tempo pada tanggal 28 April 2037. PT Kustodian Sentral Efek Indonesia (KSEI) bertindak sebagai agen pembayaran. *LTN* ini tidak dilakukan pemeringkatan.

Penerimaan bersih dari penerbitan *LTN* tersebut digunakan untuk penyaluran pembiayaan Tabungan Perumahan Rakyat (Tapera).

24. SECURITIES ISSUED (continued)

v. Long Term Notes III Through Private Placement Bank Tabungan Negara 2022 Phase II

The Bank issued Long Term Notes (LTN) Bank Tabungan Negara Through Private Placement Year 2022 with a total nominal value of Rp131,185. Such LTN were issued at 100% of their nominal value with an annual fixed interest rate of 0.55%, payable every three months with amortized principal and will mature on March 28, 2037. The payment agent for LTN is PT Kustodian Sentral Efek Indonesia (KSEI). LTN were not rated.

The net proceeds from the issuance of the bonds were used to finance Tabungan Perumahan Rakyat (Tapera) loans.

vi. Long Term Notes IV Through Private Placement Bank Tabungan Negara 2023 Phase I

The Bank issued Long Term Notes (LTN) Bank Tabungan Negara Through Private Placement Year 2023 with a total nominal value of Rp35,898. Such LTN were issued at 100% of their nominal value with an annual fixed interest rate of 0.55%, payable every three months with amortized principal and will mature on April 28, 2037. The payment agent for LTN is PT Kustodian Sentral Efek Indonesia (KSEI). LTN were not rated.

The net proceeds from the issuance of the bonds were used to finance Tabungan Perumahan Rakyat (Tapera) loans.

24. SURAT-SURAT BERHARGA YANG DITERBITKAN (lanjutan)

vii. *Long Term Note* IV Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2023 Tahap II

Bank menerbitkan *Long Term Note (LTN)* Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2023 dengan jumlah nilai nominal sebesar Rp404.745. *LTN* tersebut diterbitkan senilai 100% dari nilai nominalnya dengan tingkat bunga tetap tahunan sebesar 1,37% yang dibayarkan tiap tiga bulanan berikut amortisasi pokok dan akan jatuh tempo pada tanggal 15 September 2037. PT Kustodian Sentral Efek Indonesia (KSEI) bertindak sebagai agen pembayaran. *LTN* ini tidak dilakukan pemeringkatan.

Penerimaan bersih dari penerbitan *LTN* tersebut digunakan untuk penyaluran pembiayaan Tabungan Perumahan Rakyat (Tapera).

viii. *Long Term Note* IV Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2023 Tahap III Seri A

Bank menerbitkan *Long Term Note (LTN)* Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2023 dengan jumlah nilai nominal sebesar Rp6.242. *LTN* tersebut diterbitkan senilai 100% dari nilai nominalnya dengan tingkat bunga tetap tahunan sebesar 0,55% yang dibayarkan tiap tiga bulanan berikut amortisasi pokok dan akan jatuh tempo pada tanggal 27 Desember 2038. PT Kustodian Sentral Efek Indonesia (KSEI) bertindak sebagai agen pembayaran. *LTN* ini tidak dilakukan pemeringkatan.

Penerimaan bersih dari penerbitan *LTN* tersebut digunakan untuk penyaluran pembiayaan Tabungan Perumahan Rakyat (Tapera).

24. SECURITIES ISSUED (continued)

vii. Long Term Notes IV Through Private Placement Bank Tabungan Negara 2023 Phase II

The Bank issued Long Term Notes (LTN) Bank Tabungan Negara Through Private Placement Year 2023 with a total nominal value of Rp404,745. Such LTN were issued at 100% of their nominal value with an annual fixed interest rate of 1.37%, payable every three months with amortized principal and will mature on September 15, 2037. The payment agent for LTN is PT Kustodian Sentral Efek Indonesia (KSEI). LTN were not rated.

The net proceeds from the issuance of the bonds were used to finance Tabungan Perumahan Rakyat (Tapera) loans.

viii. Long Term Notes IV Through Private Placement Bank Tabungan Negara 2023 Phase III Series A

The Bank issued Long Term Notes (LTN) Bank Tabungan Negara Through Private Placement Year 2023 with a total nominal value of Rp6,242. Such LTN were issued at 100% of their nominal value with an annual fixed interest rate of 0.55%, payable every three months with amortized principal and will mature on December 27, 2038. The payment agent for LTN is PT Kustodian Sentral Efek Indonesia (KSEI). LTN were not rated.

The net proceeds from the issuance of the bonds were used to finance Tabungan Perumahan Rakyat (Tapera) loans.

24. SURAT-SURAT BERHARGA YANG DITERBITKAN (lanjutan)

ix. *Long Term Note* IV Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2023 Tahap III Seri B

Bank menerbitkan *Long Term Note (LTN)* Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2023 dengan jumlah nilai nominal sebesar Rp234.542. *LTN* tersebut diterbitkan senilai 100% dari nilai nominalnya dengan tingkat bunga tetap tahunan sebesar 1,37% yang dibayarkan tiap tiga bulanan berikut amortisasi pokok dan akan jatuh tempo pada tanggal 27 Desember 2037. PT Kustodian Sentral Efek Indonesia (KSEI) bertindak sebagai agen pembayaran. *LTN* ini tidak dilakukan pemeringkatan.

Penerimaan bersih dari penerbitan *LTN* tersebut digunakan untuk penyaluran pembiayaan Tabungan Perumahan Rakyat (Tapera).

x. *Long Term Note* IV Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2024 Tahap IV

Bank menerbitkan Long Term Note (LTN) Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2024 dengan jumlah nilai nominal sebesar Rp203.351. LTN tersebut diterbitkan senilai 100% dari nilai nominalnya dengan tingkat bunga tetap tahunan sebesar 1,37% yang dibayarkan tiap tiga bulanan berikut amortisasi pokok dan akan jatuh tempo pada tanggal 7 Agustus 2038. PT Kustodian Sentral Efek Indonesia (KSEI) bertindak sebagai agen pembayaran. LTN ini tidak dilakukan pemeringkatan.

Penerimaan bersih dari penerbitan LTN tersebut digunakan untuk penyaluran pembiayaan Tabungan Perumahan Rakyat (Tapera).

24. SECURITIES ISSUED (continued)

ix. Long Term Notes IV Through Private Placement Bank Tabungan Negara 2023 Phase III Series B

The Bank issued Long Term Notes (LTN) Bank Tabungan Negara Through Private Placement Year 2023 with a total nominal value of Rp234,542. Such LTN were issued at 100% of their nominal value with an annual fixed interest rate of 1.37%, payable every three months with amortized principal and will mature on December 27, 2037. The payment agent for LTN is PT Kustodian Sentral Efek Indonesia (KSEI). LTN were not rated.

The net proceeds from the issuance of the bonds were used to finance Tabungan Perumahan Rakyat (Tapera) loans.

x. Long Term Notes IV Through Private Placement Bank Tabungan Negara 2024 Phase IV

The Bank issued Long Term Notes (LTN) Bank Tabungan Negara Through Private Placement Year 2024 with a total nominal value of Rp203.351. Such LTN were issued at 100% of their nominal value with an annual fixed interest rate of 1.37%, payable every three months with amortized principal and will mature on August 7, 2038. The payment agent for LTN is PT Kustodian Sentral Efek Indonesia (KSEI). LTN were not rated.

The net proceeds from the issuance of the bonds were used to finance Tabungan Perumahan Rakyat (Tapera) loans.

24. SURAT-SURAT BERHARGA YANG DITERBITKAN (lanjutan)

xi. *Long Term Note* IV Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2024 Tahap V

Bank menerbitkan Long Term Note (LTN) Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2024 dengan jumlah nilai nominal sebesar Rp312.678. LTN tersebut diterbitkan senilai 100% dari nilai nominalnya dengan tingkat bunga tetap tahunan sebesar 1,37% yang dibayarkan tiap tiga bulanan berikut amortisasi pokok dan akan jatuh tempo pada tanggal 27 Desember 2038. PT Kustodian Sentral Efek Indonesia (KSEI) bertindak sebagai agen pembayaran. LTN ini tidak dilakukan pemeringkatan.

Penerimaan bersih dari penerbitan LTN tersebut digunakan untuk penyaluran pembiayaan Tabungan Perumahan Rakyat (Tapera).

xii. *Long Term Note* IV Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2024 Tahap VI

Bank menerbitkan Long Term Note (LTN) Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2024 dengan jumlah nilai nominal sebesar Rp147.909. LTN tersebut diterbitkan senilai 100% dari nilai nominalnya dengan tingkat bunga tetap tahunan sebesar 1,37% yang dibayarkan tiap tiga bulanan berikut amortisasi pokok dan akan jatuh tempo pada tanggal 23 Desember 2038. PT Kustodian Sentral Efek Indonesia (KSEI) bertindak sebagai agen pembayaran. LTN ini tidak dilakukan pemeringkatan.

Penerimaan bersih dari penerbitan LTN tersebut digunakan untuk penyaluran pembiayaan Tabungan Perumahan Rakyat (Tapera).

24. SECURITIES ISSUED (continued)

xi. Long Term Notes IV Through Private Placement Bank Tabungan Negara 2024 Phase V

The Bank issued Long Term Notes (LTN) Bank Tabungan Negara Through Private Placement Year 2024 with a total nominal value of Rp312.678. Such LTN were issued at 100% of their nominal value with an annual fixed interest rate of 1.37%, payable every three months with amortized principal and will mature on December 27, 2038. The payment agent for LTN is PT Kustodian Sentral Efek Indonesia (KSEI). LTN were not rated.

The net proceeds from the issuance of the bonds were used to finance Tabungan Perumahan Rakyat (Tapera) loans.

xii. Long Term Notes IV Through Private Placement Bank Tabungan Negara 2024 Phase VI

The Bank issued Long Term Notes (LTN) Bank Tabungan Negara Through Private Placement Year 2024 with a total nominal value of Rp147.909. Such LTN were issued at 100% of their nominal value with an annual fixed interest rate of 1.37%, payable every three months with amortized principal and will mature on December 23, 2038. The payment agent for LTN is PT Kustodian Sentral Efek Indonesia (KSEI). LTN were not rated.

The net proceeds from the issuance of the bonds were used to finance Tabungan Perumahan Rakyat (Tapera) loans.

24. SURAT-SURAT BERHARGA YANG DITERBITKAN (lanjutan)

xiii. Sukuk *Mudharabah* Bank Tabungan Negara Tahun 2023 Tahap I

Bank menerbitkan Sukuk *Mudharabah* Jangka Panjang Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2023 tahap I dengan jumlah nilai nominal sebesar Rp92.553. Sukuk tersebut diterbitkan senilai 100% dari nilai nominalnya dengan dengan nisbah bagi hasil sebesar 11,00% yang dihitung dari pendapatan bagi hasil dengan indikasi bagi hasil sebesar ekuivalen sebesar 0,55% per tahun yang dibayarkan tiap tahun berikut amortisasi dana sukuk dan akan jatuh tempo pada tanggal 28 Oktober 2036. PT Kustodian Sentral Efek Indonesia (KSEI) bertindak sebagai agen pembayaran. Sukuk ini tidak dilakukan pemeringkatan.

Penerimaan bersih dari penerbitan Sukuk tersebut digunakan untuk penyaluran pembiayaan Syariah Tabungan Perumahan Rakyat (Syariah Tapera).

xiv. Sukuk *Mudharabah* Bank Tabungan Negara Tahun 2023 Tahap II

Bank menerbitkan Sukuk *Mudharabah* Jangka Panjang Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2023 tahap II dengan jumlah nilai nominal sebesar Rp175.039. Sukuk tersebut diterbitkan senilai 100% dari nilai nominalnya dengan dengan nisbah bagi hasil sebesar 27,40% yang dihitung dari pendapatan bagi hasil dengan indikasi bagi hasil sebesar ekuivalen sebesar 1,37% yang dibayarkan tiap tahun berikut amortisasi dana sukuk dan akan jatuh tempo pada tanggal 27 Desember 2036. PT Kustodian Sentral Efek Indonesia (KSEI) bertindak sebagai agen pembayaran. Sukuk ini tidak dilakukan pemeringkatan.

Penerimaan bersih dari penerbitan Sukuk tersebut digunakan untuk penyaluran pembiayaan Syariah Tabungan Perumahan Rakyat (Syariah Tapera).

24. SECURITIES ISSUED (continued)

xiii. Sukuk Mudharabah Bank Tabungan Negara 2023 Phase I

The Bank issued Long Term Sukuk Mudharabah Bank Tabungan Negara Through Private Placement Year 2023 Phase I with a total nominal value of Rp92,553. Such Sukuk were issued at 100% of their nominal value with a profit-sharing ratio of 11.00% which is calculated from profit sharing income with indication of an equivalent of 0.55%, payable every year with amortized sukuk and will mature on October 28, 2036. The payment agent for Sukuk is PT Kustodian Sentral Efek Indonesia (KSEI). Sukuk were not rated.

The net proceeds from the issuance of the bonds were used to Sharia finance Tabungan Perumahan Rakyat (Sharia Tapera) loans.

xiv. Sukuk Mudharabah Bank Tabungan Negara 2023 Phase II

The Bank issued Long Term Sukuk Mudharabah Bank Tabungan Negara Through Private Placement Year 2023 Phase II with a total nominal value of Rp175,039. Such Sukuk were issued at 100% of their nominal value with a profit-sharing ratio of 27.40% which is calculated from profit sharing income with indication of an equivalent of 1.37%, payable every year with amortized sukuk and will mature on December 27, 2036. The payment agent for Sukuk is PT Kustodian Sentral Efek Indonesia (KSEI). Sukuk were not rated.

The net proceeds from the issuance of the bonds were used to Sharia finance Tabungan Perumahan Rakyat (Sharia Tapera) loans.

24. SURAT-SURAT BERHARGA YANG DITERBITKAN (lanjutan)

xv. Sukuk Mudharabah Bank Tabungan Negara Tahun 2024 Tahap III

Bank menerbitkan Sukuk *Mudharabah* Jangka Panjang Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2024 tahap III dengan jumlah nilai nominal sebesar Rp80.956. Sukuk tersebut diterbitkan senilai 100% dari nilai nominalnya dengan dengan nisbah bagi hasil sebesar 27,40% yang dihitung dari pendapatan bagi hasil dengan indikasi bagi hasil sebesar ekuivalen sebesar 1,37% yang dibayarkan tiap tahun berikut amortisasi dana sukuk dan akan jatuh tempo pada tanggal 27 Desember 2037. PT Kustodian Sentral Efek Indonesia (KSEI) bertindak sebagai agen pembayaran. Sukuk ini tidak dilakukan pemeringkatan.

Penerimaan bersih dari penerbitan Sukuk tersebut digunakan untuk penyaluran pembiayaan Syariah Tabungan Perumahan Rakyat (Syariah Tapera).

xvi. Sukuk Mudharabah Bank Tabungan Negara Tahun 2024 Tahap IV

Bank menerbitkan Sukuk *Mudharabah* Jangka Panjang Yang Dilakukan Tanpa Melalui Penawaran Umum Bank Tabungan Negara Tahun 2024 tahap III dengan jumlah nilai nominal sebesar Rp52.444. Sukuk tersebut diterbitkan senilai 100% dari nilai nominalnya dengan dengan nisbah bagi hasil sebesar 27,40% yang dihitung dari pendapatan bagi hasil dengan indikasi bagi hasil sebesar ekuivalen sebesar 1,37% yang dibayarkan tiap tahun berikut amortisasi dana sukuk dan akan jatuh tempo pada tanggal 23 September 2038. PT. Kustodian Sentral Efek Indonesia (KSEI) bertindak sebagai agen pembayaran. Sukuk ini tidak dilakukan pemeringkatan.

Penerimaan bersih dari penerbitan Sukuk tersebut digunakan untuk penyaluran pembiayaan Syariah Tabungan Perumahan Rakyat (Syariah Tapera).

24. SECURITIES ISSUED (continued)

xv. Sukuk Mudharabah Bank Tabungan Negara 2024 Phase III

The Bank issued Long Term Sukuk Mudharabah Bank Tabungan Negara Through Private Placement Year 2024 Phase III with a total nominal value of Rp80,956. Such Sukuk were issued at 100% of their nominal value with a profit-sharing ratio of 27.40% which is calculated from profit sharing income with indication of an equivalent of 1.37%, payable every year with amortized sukuk and will mature on December 27, 2037. The payment agent for Sukuk is PT Kustodian Sentral Efek Indonesia (KSEI). Sukuk were not rated.

The net proceeds from the issuance of the bonds were used to Sharia finance Tabungan Perumahan Rakyat (Sharia Tapera) loans.

xvi. Sukuk Mudharabah Bank Tabungan Negara 2024 Phase IV

The Bank issued Long Term Sukuk Mudharabah Bank Tabungan Negara Through Private Placement Year 2024 Phase III with a total nominal value of Rp52,444. Such Sukuk were issued at 100% of their nominal value with a profit-sharing ratio of 27.40% which is calculated from profit sharing income with indication of an equivalent of 1.37%, payable every year with amortized sukuk and will mature on September 23, 2038. The payment agent for Sukuk is PT. Kustodian Sentral Efek Indonesia (KSEI). Sukuk were not rated.

The net proceeds from the issuance of the bonds were used to Sharia finance Tabungan Perumahan Rakyat (Sharia Tapera) loans.

24. SURAT-SURAT BERHARGA YANG DITERBITKAN (lanjutan)

xvii. Obligasi Berkelanjutan IV Tahap II

Bank menerbitkan Obligasi Berkelanjutan IV BTN Tahap II Tahun 2022 dengan jumlah nilai nominal sebesar Rp1.000.000 yang terdaftar di Bursa Efek Indonesia (BEI). Obligasi tersebut diterbitkan senilai 100% dari nilai nominalnya dengan tingkat bunga tetap tahunan sebesar 5,50% dan 6,00% yang dibayarkan tiap tiga bulanan masing-masing untuk Obligasi Berkelanjutan IV Tahap II Seri A dan Seri B dan akan jatuh tempo masing-masing pada tanggal 24 Mei 2025 dan 24 Mei 2027. Penerbitan Obligasi Berkelanjutan IV Tahap II tahun 2022 tersebut telah dinyatakan efektif berdasarkan surat Dewan Komisioner Otoritas Jasa Keuangan No.S-211/D.04/2020 tanggal 11 Agustus 2020.

Penerimaan bersih dari penerbitan obligasi tersebut digunakan sebagai sumber pembiayaan kredit. Hak pemegang obligasi adalah paripassu tanpa hak preferen dengan hak-hak kreditur Bank lainnya baik yang ada sekarang maupun dikemudian hari, kecuali hak-hak kreditur Bank yang dijamin secara khusus dengan kekayaan Bank baik yang telah ada maupun yang akan ada dikemudian hari. Obligasi ini tidak termasuk dalam program jaminan Pemerintah terhadap kewajiban pembayaran bank umum.

Pada tanggal 31 Desember 2024, 2023, dan 2022, Obligasi Berkelanjutan IV BTN Tahap II masing-masing mendapat penilaian peringkat idAA+, idAA+, dan idAA dari PT Fitch Ratings Indonesia.

Bertindak sebagai wali amanat Obligasi Berkelanjutan IV Tahap II adalah PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk.

24. SECURITIES ISSUED (continued)

xvii. Continuing Bonds IV Phase II

The Bank issued Continuing Bonds IV Phase II of 2022 with a total nominal value of Rp1,000,000, which are registered in the Indonesia Stock Exchange (IDX). Such bonds were issued at 100% of their nominal value with an annual fixed interest rates of 5.50% and 6.00%, payable every three months for Continuing Bonds IV Phase II Series A dan Series B, respectively, and will mature on May 24, 2025 and May 24, 2027, respectively. The issuance of Continuing Bonds IV Phase II of 2022 became effective based on Letter No. S-211/D.04/2020 dated August 11, 2020 of the Board of Commisioners of the Financial Services Authority.

The net proceeds from the issuance of the bonds were used to finance loans. The rights of the bondholders rank paripassu, without preferential rights, with those of the Bank's other creditors for existing or future creditor rights, except for the Bank's creditors' rights which are guaranteed specifically by the Bank's existing or future assets. The bonds are not included in the Government's guarantee program on the obligations of commercial banks.

As of December 31, 2024, 2023, and 2022, Continuing Bonds IV Phase II were rated idAA+, idAA+, and idAA by PT Fitch Ratings Indonesia.

The trustee for Continuing Bonds IV Phase II is PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk.

24. SURAT-SURAT BERHARGA YANG DITERBITKAN (lanjutan)

xviii. Obligasi Berkelanjutan IV Tahap I

Bank menerbitkan Obligasi Berkelanjutan IV BTN Tahap I Tahun 2020 dengan jumlah nilai nominal sebesar Rp1.500.000 yang terdaftar di Bursa Efek Indonesia (BEI). Obligasi tersebut diterbitkan senilai 100% dari nilai nominalnya dengan tingkat bunga tetap tahunan sebesar 6,75%, 7,80% dan 8,40% yang dibayarkan tiap tiga bulanan masing-masing untuk Obligasi Berkelanjutan IV Tahap I Seri A, Seri B dan Seri C dan akan jatuh tempo masing-masing pada tanggal 29 Agustus 2021, 19 Agustus 2023, dan 19 Agustus 2025. Penerbitan Obligasi Berkelanjutan IV Tahap I tahun 2020 tersebut telah dinyatakan efektif berdasarkan surat Dewan Komisioner Otoritas Jasa Keuangan No.S-211/D.04/2020 tanggal 11 Agustus 2020.

Penerimaan bersih dari penerbitan obligasi tersebut digunakan sebagai sumber pembiayaan kredit. Hak pemegang obligasi adalah paripassu tanpa hak preferen dengan hak-hak kreditur Bank lainnya baik yang ada sekarang maupun dikemudian hari, kecuali hak-hak kreditur Bank yang dijamin secara khusus dengan kekayaan Bank baik yang telah ada maupun yang akan ada dikemudian hari. Obligasi ini tidak termasuk dalam program jaminan Pemerintah terhadap kewajiban pembayaran bank umum.

Pada tanggal 31 Desember 2024, 2023, dan 2022, Obligasi Berkelanjutan IV BTN Tahap I masing-masing mendapat penilaian peringkat idAA+, idAA+, dan idAA dari PT Fitch Ratings Indonesia.

Bertindak sebagai wali amanat Obligasi Berkelanjutan IV Tahap I adalah PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk.

Sampai tanggal 31 Desember 2024, Obligasi Berkelanjutan IV Tahap I Seri A dan B telah dilunasi oleh Bank pada tanggal jatuh tempo.

24. SECURITIES ISSUED (continued)

xviii. Continuing Bonds IV Phase I

The Bank issued Continuing Bonds IV Phase I of 2020 with a total nominal value of Rp1,500,000, which are registered in the Indonesia Stock Exchange (IDX). Such bonds were issued at 100% of their nominal value with an annual fixed interest rates of 6.75%, 7.80% and 8.40%, payable every three months for Continuing Bonds IV Phase I Series A, Series B and Series C, respectively, and will mature on August 29, 2021, August 19, 2023, and August 19, 2025, respectively. The issuance of Continuing Bonds IV Phase I of 2020 became effective based on Letter No. S-211/D.04/2020 dated August 11, 2020 of the Board of Commisioners of the Financial Services Authority.

The net proceeds from the issuance of the bonds were used to finance loans. The rights of the bondholders rank paripassu, without preferential rights, with those of the Bank's other creditors for existing or future creditor rights, except for the Bank's creditors' rights which are guaranteed specifically by the Bank's existing or future assets. The bonds are not included in the Government's guarantee program on the obligations of commercial banks.

As of December 31, 2024, 2023, and 2022, Continuing Bonds IV Phase I were rated idAA+, idAA+, and idAA by PT Fitch Ratings Indonesia, respectively.

The trustee for Continuing Bonds IV Phase I is PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk.

Until December 31, 2024, Continuing Bonds IV Phase I Series A and B has been fully paid by the Bank on the maturity date.

24. SURAT-SURAT BERHARGA YANG DITERBITKAN (lanjutan)

xix. Obligasi Berkelanjutan III Tahap II

Bank menerbitkan Obligasi Berkelanjutan III BTN Tahap II Tahun 2019 dengan jumlah nilai nominal sebesar Rp4.144.000 yang terdaftar di Bursa Efek Indonesia (BEI). Obligasi tersebut diterbitkan senilai 100% dari nilai nominalnya dengan tingkat bunga tetap tahunan sebesar 7,75%, 8,75% dan 9,00% yang dibayarkan tiap tiga bulanan masing-masing untuk Obligasi Berkelanjutan III Tahap II Seri A, Seri B dan Seri C dan akan jatuh tempo masing-masing pada tanggal 8 Juli 2020, 28 Juni 2022, dan 28 Juni 2024. Penerbitan Obligasi Berkelanjutan III Tahap II tahun 2019 tersebut telah dinyatakan efektif berdasarkan surat Dewan Komisioner Otoritas Jasa Keuangan No. S-352/D.04/ 2017 tanggal 22 Juni 2017.

Penerimaan bersih dari penerbitan obligasi tersebut digunakan sebagai sumber pembiayaan kredit. Hak pemegang obligasi adalah paripassu tanpa hak preferen dengan hak-hak kreditur Bank lainnya baik yang ada sekarang maupun dikemudian hari, kecuali hak-hak kreditur Bank yang dijamin secara khusus dengan kekayaan Bank baik yang telah ada maupun yang akan ada dikemudian hari. Obligasi ini tidak termasuk dalam program jaminan Pemerintah terhadap kewajiban pembayaran bank umum.

Pada tanggal 31 Desember 2024, 2023, dan 2022, Obligasi Berkelanjutan III BTN Tahap II masing-masing mendapat penilaian peringkat idAA+, idAA+, dan idAA dari PT Fitch Ratings Indonesia.

Bertindak sebagai wali amanat Obligasi Berkelanjutan III Tahap II adalah PT Bank Mega Tbk.

Sampai tanggal 31 Desember 2024, Obligasi Berkelanjutan III Tahap II Seri A, Seri B dan Seri C telah dilunasi oleh Bank pada tanggal jatuh tempo.

24. SECURITIES ISSUED (continued)

xix. Continuing Bonds III Phase II

The Bank issued Continuing Bonds III Phase II of 2019 with a total nominal value of Rp4,144,000, which are registered in the Indonesia Stock Exchange (IDX). Such bonds were issued at 100% of their nominal value with an annual fixed interest rates of 7.75%, 8.75% and 9.00%, payable every three months for Continuing Bonds III Phase II Series A, Series B and Series C, respectively, and will mature on July 8, 2020, June 28, 2022, and June 28, 2024, respectively. The issuance of Continuing Bonds III Phase II of 2019 became effective based on Letter No. S-352/D.04/2017 dated June 22, 2017 of the Board of Commisioners of the Financial Services Authority.

The net proceeds from the issuance of the bonds were used to finance loans. The rights of the bondholders rank paripassu, without preferential rights, with those of the Bank's other creditors for existing or future creditor rights, except for the Bank's creditors' rights which are guaranteed specifically by the Bank's existing or future assets. The bonds are not included in the Government's guarantee program on the obligations of commercial banks.

As of December 31, 2024, 2023 and 2022, Continuing Bonds III Phase II were rated idAA+, idAA+, and idAA by PT Fitch Ratings Indonesia, respectively.

The trustee for Continuing Bonds III Phase II is PT Bank Mega Tbk.

Until December 31, 2024, Continuing Bonds III Phase II Series A, Series B and Series C has been fully paid by the Bank on the maturity date.

24. SURAT-SURAT BERHARGA YANG DITERBITKAN (lanjutan)

xx. Obligasi Berkelanjutan III Tahap I

Bank menerbitkan Obligasi Berkelanjutan III BTN Tahap I Tahun 2017 dengan jumlah nilai nominal sebesar Rp5.000.000 yang terdaftar di Bursa Efek Indonesia (BEI). Obligasi tersebut diterbitkan senilai 100% dari nilai nominalnya dengan tingkat bunga tetap tahunan sebesar 8,30%, 8,50%, 8,70% dan 8,90% yang dibayarkan tiap tiga bulanan masing-masing untuk Obligasi Berkelanjutan III Tahap I Seri A, Seri B, Seri C dan Seri D dan akan jatuh tempo masing-masing pada tanggal 13 Juli 2020, 13 Juli 2022, 13 Juli 2024 dan 13 Juli 2027. Penerbitan Obligasi Berkelanjutan III Tahap I tahun 2017 tersebut telah dinyatakan efektif berdasarkan surat Dewan Komisioner Otoritas Jasa Keuangan No. S-352/D.04/2017 tanggal 22 Juni 2017.

Penerimaan bersih dari penerbitan obligasi tersebut digunakan sebagai sumber pembiayaan kredit. Hak pemegang obligasi adalah paripassu tanpa hak preferen dengan hak-hak kreditur Bank lainnya baik yang ada sekarang maupun dikemudian hari, kecuali hak-hak kreditur Bank yang dijamin secara khusus dengan kekayaan Bank baik yang telah ada maupun yang akan ada dikemudian hari. Obligasi ini tidak termasuk dalam program jaminan Pemerintah terhadap kewajiban pembayaran bank umum.

Pada tanggal 31 Desember 2024, 2023, dan 2022, Obligasi Berkelanjutan III BTN Tahap I masing-masing mendapat penilaian peringkat idAA+, idAA+, and idAA dari PT Fitch Ratings Indonesia.

Bertindak sebagai wali amanat Obligasi Berkelanjutan III Tahap I adalah PT Bank Mandiri (Persero) Tbk.

Sampai tanggal 31 Desember 2024, Obligasi Berkelanjutan III Tahap I Seri A, Seri B, dan Seri C telah dilunasi oleh Bank pada tanggal jatuh tempo.

24. SECURITIES ISSUED (continued)

xx. Continuing Bonds III Phase I

The Bank issued Continuing Bonds III Phase I of 2017 with a total nominal value of Rp5,000,000, which are registered in the Indonesia Stock Exchange (IDX). Such bonds were issued at 100% of their nominal value with an annual fixed interest rates of 8.30%, 8.50%, 8.70% and 8.90%, payable every three months for Continuing Bonds III Phase I Series A, Series B, Series C and Series D, respectively, and will mature on July 13, 2020, July 13, 2022, July 13, 2024 and July 13, 2027, respectively. The issuance of Continuing Bonds III Phase I of 2017 became effective based on Letter No. S-352/D.04/2017 dated June 22, 2017 of the Board of Commisioners the Financial Services Authority.

The net proceeds from the issuance of the bonds were used to finance loans. The rights of the bondholders rank paripassu, without preferential rights, with those of the Bank's other creditors for existing or future creditor rights, except for the Bank's creditors' rights which are guaranteed specifically by the Bank's existing or future assets. The bonds are not included in the Government's guarantee program on the obligations of commercial banks.

As of December 31, 2024, 2023, and 2022, Continuing Bonds III Phase I were rated idAA+, idAA+, and idAA by PT Fitch Ratings Indonesia, respectively.

The trustee for Continuing Bonds III Phase I is PT Bank Mandiri (Persero) Tbk.

Until December 31, 2024, Continuing Bonds III Phase I Series A and Series B, and Series C has been fully paid by the Bank on the maturity date.

24. SURAT-SURAT BERHARGA YANG DITERBITKAN (lanjutan)

xxi. Obligasi Berkelanjutan II Tahap I

Bank menerbitkan Obligasi Berkelanjutan II Tahap I Tahun 2015 dengan jumlah nilai nominal sebesar Rp3.000.000 yang terdaftar di Bursa Efek Indonesia (BEI). Obligasi tersebut diterbitkan senilai 100% dari nilai nominalnya dengan tingkat bunga tetap tahunan sebesar 9,63%, 9,88%, 10,00% dan 10,50% yang dibayarkan tiap tiga bulanan masing-masing untuk Obligasi Berkelanjutan II Tahap I Seri A, Seri B, Seri C dan Seri D dan akan jatuh tempo masing-masing pada tanggal 8 Juli 2018, 8 Juli 2020, 8 Juli 2022 dan 8 Juli 2025. Penerbitan Obligasi Berkelanjutan II Tahap I tahun 2015 tersebut telah dinyatakan efektif berdasarkan surat Dewan Komisioner Otoritas Jasa Keuangan No. S-207/D.04/2015 tanggal 30 Juni 2015.

Penerimaan bersih dari penerbitan obligasi tersebut digunakan sebagai sumber pembiayaan kredit. Hak pemegang obligasi adalah paripassu tanpa hak preferen dengan hak-hak kreditur Bank lainnya baik yang ada sekarang maupun dikemudian hari, kecuali hak-hak kreditur Bank yang dijamin secara khusus dengan kekayaan Bank baik yang telah ada maupun yang akan ada dikemudian hari. Obligasi ini tidak termasuk dalam program jaminan Pemerintah terhadap kewajiban pembayaran bank umum.

Pada tanggal 31 Desember 2024, 2023, and 2022 Obligasi Berkelanjutan II Tahap I masing-masing mendapat penilaian peringkat idAA+, idAA+, dan idAA dari PT Fitch Ratings Indonesia.

Bertindak sebagai wali amanat Obligasi Berkelanjutan II Tahap I adalah PT Bank Mega Tbk.

Sampai tanggal 31 Desember 2024, Obligasi Berkelanjutan II Tahap I Seri A, Seri B dan Seri C telah dilunasi oleh Bank pada tanggal jatuh tempo.

24. SECURITIES ISSUED (continued)

xxi. Continuing Bonds II Phase I

The Bank issued Continuing Bonds II Phase I of 2015 with a total nominal value of Rp3,000,000, which are registered in the Indonesia Stock Exchange (IDX). Such bonds were issued at 100% of their nominal value with an annual fixed interest rates of 9.63%, 9.88%, 10.00% and 10.50%, payable every three months for Continuing Bonds II Phase I Series A, Series B, Series C and Series D, respectively, and will mature on July 8, 2018, July 8, 2020, July 8, 2022 and July 8, 2025, respectively. The issuance of Continuing Bonds II Phase I of 2015 became effective based on Letter No. S-207/D.04/2015 dated June 30, 2015 of the Board of Commisioners of the Financial Services Authority.

The net proceeds from the issuance of the bonds were used to finance loans. The rights of the bondholders rank paripassu, without preferential rights, with those of the Bank's other creditors for existing or future creditor rights, except for the Bank's creditors' rights which are guaranteed specifically by the Bank's existing or future assets. The bonds are not included in the Government's guarantee program on the obligations of commercial banks.

As of December 31, 2024, 2023, and 2022, Continuing Bonds II Phase I were rated idAA+, idAA+, and idAA by PT Fitch Ratings Indonesia, respectively.

The trustee for Continuing Bonds II Phase I is PT Bank Mega Tbk.

Until December 31, 2024, Continuing Bonds II Phase I Series A, Series B and Series C has been fully paid by the Bank on the maturity date

24. SURAT-SURAT BERHARGA YANG DITERBITKAN (lanjutan)

xxii. Obligasi Berkelanjutan I Tahap II

Bank menerbitkan Obligasi Berkelanjutan I Tahap II Tahun 2013 dengan jumlah nilai nominal sebesar Rp2.000.000 yang terdaftar di Bursa Efek Indonesia (BEI). Obligasi tersebut diterbitkan senilai 100% dari nilai nominalnya dengan tingkat bunga tetap tahunan sebesar 7,90% yang dibayarkan tiap tiga bulanan dan akan jatuh tempo pada tanggal 27 Maret 2023. Penerbitan Obligasi Berkelanjutan I Tahap II tahun 2013 tersebut telah dinyatakan efektif berdasarkan surat Ketua BAPEPAM-LK No. S-6349/BL/2012 tanggal 28 Mei 2012.

Penerimaan bersih dari penerbitan obligasi tersebut digunakan sebagai sumber pembiayaan kredit. Hak pemegang obligasi adalah paripassu tanpa hak preferen dengan hak-hak kreditur Bank lainnya baik yang ada sekarang maupun di kemudian hari, kecuali hak-hak kreditur Bank yang dijamin secara khusus dengan kekayaan Bank baik yang telah ada maupun yang akan ada di kemudian hari. Obligasi ini tidak dijamin dengan jaminan khusus, tetapi dijamin dengan seluruh harta kekayaan Bank, baik barang bergerak maupun barang tidak bergerak, baik yang telah ada maupun yang akan ada di kemudian hari menjadi jaminan bagi pemegang obligasi.

Pada tanggal 31 Desember 2022, Obligasi Berkelanjutan I BTN Tahap II mendapat penilaian peringkat idAA dari PT Fitch Ratings Indonesia.

Pada tanggal 12 Oktober 2020, Bank melakukan pembelian kembali Obligasi I Tahap II dengan nilai nominal sebesar Rp75.000 dengan harga beli Rp76.620. Pada tanggal 27 Mei 2022, Bank melakukan penjualan kembali Obligasi I Tahap II dengan nilai nominal sebesar Rp75.000 dengan harga jual Rp77.250.

Bertindak sebagai wali amanat Obligasi Berkelanjutan I BTN Tahap II adalah PT Bank Mega Tbk.

Sampai tanggal 31 Desember 2024, Obligasi Berkelanjutan I Tahap II Tahun 2023 telah dilunasi oleh Bank pada tanggal jatuh tempo.

24. SECURITIES ISSUED (continued)

xxii. Continuing Bonds I Phase II

The Bank issued Continuing Bonds I Phase II 2013 with a total nominal value of Rp2,000,000, which are registered in the Indonesia Stock Exchange (IDX). Such bonds were issued at 100% of their nominal value with an annual fixed interest rate of 7.90%, payable every three months and are due on March 27, 2023. The issuance of Continuing Bonds I Phase II of 2013 became effective based on Letter No. S-6349/BL/2012 dated May 28, 2012 of the Chairman of BAPEPAM-LK.

The net proceeds from the issuance of the bonds were used to finance loans. The rights of the bondholders rank paripassu, without preferential rights, with those of the Bank's other creditors for existing or future creditor rights, except for the Bank's creditors' rights which are guaranteed specifically by the Bank's existing or future assets. The bonds are not secured by specific collateral, but are secured by all assets of the Bank, both movable and immovable, and those that are existing and will exist in the future, which are attributable to the Bank's bondholders.

As of December 31, 2022, Continuing Bonds I Phase II were rated idAA by PT Fitch Ratings Indonesia.

As of October 12, 2020, the Bank bought back BTN Continuing Bonds I Phase II Bonds for nominal value of Rp75,000 with repurchased price of Rp76,620. As of May 27, 2022, the Bank resell BTN Continuing Bonds I Phase II Bonds for nominal value of Rp75,000 with reselling price of Rp77,250.

The trustee for Continuing Bonds I Phase II is PT Bank Mega Tbk.

Until December 31, 2024, Continuing Bonds I Phase II 2023 has been fully paid by the Bank on the maturity date.

24. SURAT-SURAT BERHARGA YANG DITERBITKAN (lanjutan)

xviii. Negotiable Certificate of Deposits

Pada tanggal 20 Oktober 2023, Bank menerbitkan *Negotiable Certificate of Deposits (NCD)* Tahap I dengan nilai pokok sebesar Rp1.500.000 dalam 3 (tiga) seri sebagai berikut:

- Seri A: Nilai pokok *NCD* sebesar Rp500.000 dengan tingkat bunga tetap sebesar 6,40% per tahun, untuk jangka waktu 181 (seratus delapan puluh satu) hari dan akan jatuh tempo pada tanggal 17 April 2024. *NCD* tersebut diterbitkan sebesar 96,90%. Sampai tanggal 31 Desember 2024, NCD Seri A telah dilunasi oleh Bank pada tanggal jatuh tempo.
- Seri B: Nilai pokok *NCD* sebesar Rp70.000 dengan tingkat bunga tetap sebesar 6,45% per tahun, untuk jangka waktu 270 (dua ratus tujuh puluh) hari dan akan jatuh tempo pada tanggal 16 Juli 2024. *NCD* tersebut diterbitkan sebesar 95,39%. Sampai tanggal 31 Desember 2024, NCD Seri B telah dilunasi oleh Bank pada tanggal jatuh tempo.
- Seri C: Nilai pokok *NCD* sebesar Rp930.000 dengan tingkat bunga tetap sebesar 6,53% per tahun, untuk jangka waktu 365 (tiga ratus enam puluh lima) hari dan akan jatuh tempo pada tanggal 21 Oktober 2024. *NCD* tersebut diterbitkan sebesar 93,76%. Sampai tanggal 31 Desember 2024, NCD Seri C telah dilunasi oleh Bank pada tanggal jatuh tempo.

24. SECURITIES ISSUED (continued)

xviii. Negotiable Certificate of Deposits

On October 20, 2023, Bank issued Negotiable Certificate of Deposits (NCD) Phase I with principal value amounted to Rp1,500,000 within 3 (three) series as follows:

- *A Series: NCD principal value amounted to Rp500,000 with a fixed interest rate of 6.40% per annum, for 181 (one hundred and eighty one) days period and will mature on April 17, 2024. The NCD were issued at 96.90%. Until December 31, 2024, Series A NCDs have been fully paid by the Bank on the maturity date.*
- *B Series: NCD principal value amounted to Rp70,000 with a fixed interest rate of 6.45% per annum, for 270 (two hundred seventy) days period and will mature on July 16, 2024. The NCD were issued at 95.39%. Until December 31, 2024, Series B NCDs have been fully paid by the Bank on the maturity date.*
- *C Series: NCD principal value amounted to Rp930,000 with a fixed interest rate of 6.53% per annum, for 365 (three hundred sixty five) days period and will mature on October 21, 2024. The NCD were issued at 93.76%. Until December 31, 2024, Series C NCDs have been fully paid by the Bank on the maturity date.*

25. PINJAMAN YANG DITERIMA / *25. FUND BORROWINGS*

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Pihak Ketiga				*Third Parties*
Rupiah				*Rupiah*
PT Bank Central Asia Tbk	7.419.753	8.418.879	4.418.075	*PT Bank Central Asia Tbk*
PT Bank Danamon Indonesia Tbk	1.999.951	2.000.000	2.000.000	*PT Bank Danamon Indonesia Tbk*
Citibank N.A., Jakarta	-	139.861	139.483	*Citibank N.A., Jakarta*
	9.419.704	10.558.740	6.557.558	
Mata Uang Asing				*Foreign Currency*
Japan International Cooperation Agency	713.155	750.059	807.762	*Japan International Cooperation Agency*
	10.132.859	11.308.799	7.365.320	
Pihak Berelasi (Catatan 44)				*Related Parties (Note 44)*
Rupiah				*Rupiah*
PT Sarana Multigriya Finansial (Persero)	23.352.225	22.453.290	17.455.685	*PT Sarana Multigriya Finansial (Persero)*
	23.352.225	22.453.290	17.455.685	
Total	**33.485.084**	**33.762.089**	**24.821.005**	***Total***

25. PINJAMAN YANG DITERIMA (lanjutan)

a. Pinjaman dari PT Bank Central Asia Tbk

Akun ini merupakan fasilitas pinjaman yang diperoleh dari PT Bank Central Asia Tbk ditujukan untuk pembiayaan Kredit Pemilikan Rumah (KPR) kepada debitur Bank.

Bank memperoleh pinjaman dari PT Bank Central Asia Tbk berdasarkan Perjanjian Kredit No. 16 tanggal 19 Desember 2024 yang terdiri dari:

- Term Loan sebesar Rp3 triliun (angka penuh) yang memiliki bunga tetap sebesar 7,00% dengan jangka waktu selama 9 bulan yang akan jatuh tempo pada 20 September 2025.

Sebelumnya, Bank juga memiliki perjanjian pinjaman dengan PT Bank Central Asia Tbk yang telah mengalami beberapa kali perubahan. Perubahan terakhir didokumentasikan dalam Perjanjian Kredit No. 417 tanggal 3 Desember 2024 yang terdiri dari:

- Perpanjangan jangka waktu *Term Loan* V selama 12 bulan sebesar Rp4 triliun (angka penuh) yang memiliki bunga tetap sebesar 6,75% yang akan jatuh tempo pada tanggal 6 Desember 2025.

- Mengubah penyebutan "fasilitas *Term Loan* V" menjadi "fasilitas *Term Loan*"

Bank memperoleh pinjaman dari PT Bank Central Asia Tbk berdasarkan Perjanjian Kredit No. 11 tanggal 6 Desember 2023 yang terdiri dari:

- *Term Loan* II dan III yang dilakukan perpanjangan selama 36 bulan atas pinjaman tersebut sebesar masing-masing Rp1 triliun (angka penuh) yang memiliki bunga tetap sebesar masing-masing 5,50% dan akan jatuh tempo masing-masing pada tanggal 21 Juni 2024 dan 14 Juni 2024.

Bank telah melakukan pelunasan atas pinjaman tersebut saat jatuh tempo pada tanggal 21 Juni 2024 dan 14 Juni 2024 masing - masing sebesar Rp1 triliun (angka penuh).

25. FUND BORROWINGS (continued)

a. Loan from PT Bank Central Asia Tbk

This account represents loan facility obtained from PT Bank Central Asia Tbk which is intended to Finance Housing Loans (KPR) of the Bank's debtors.

The Bank obtained loan from with PT Bank Central Asia Tbk based on loan agreement No. 16 dated December 19, 2024 consist of:

- *The Term Loan amounting Rp3 trillion (full amount) with fixed interest rate 7,00% with 9 months period which will mature on September 20, 2025.*

Previously, Bank also has loan agreement with PT Bank Central Asia Tbk that has been amended several times. The last amendment was documented under the loan agreement No. 417 dated December 3, 2024 consist of:

- *The Term Loan V the loan were extended for 12 months amounting Rp4 trillion (full amount) with fixed interest rate 6.75% and will mature on December 6, 2025*

- *Amended "Term Loan Facility V" to "Term Loan Facility"*

The Bank obtained loan from with PT Bank Central Asia Tbk based on loan agreement No. 11 dated December 6, 2023 consist of:

- *The Term Loan II, and III the loan were extended for 36 months, for each Rp1 trillion (full amount) with fixed interest rate are 5.50% per annum and will mature on June 21, 2024 and June 14, 2024, respectively.*

The Bank has fully repaid the loan at maturity date on June 21, 2024 and June 14, 2024 for each amounting to Rp1 trillion (full amount).

25. PINJAMAN YANG DITERIMA (lanjutan)

a. Pinjaman dari PT Bank Central Asia Tbk (lanjutan)

- *Term Loan* IV sebesar Rp2 triliun (angka penuh) yang memiliki bunga tetap sebesar 5,50% dengan jangka waktu selama 36 bulan yang akan jatuh tempo masing-masing sebesar Rp1 triliun (angka penuh) pada 25 April 2024 dan sebesar Rp1 triliun (angka penuh) pada 8 Mei 2024.

  Bank telah melakukan pelunasan atas pinjaman tersebut saat jatuh tempo pada tanggal 25 April dan 8 Mei 2024 masing-masing sebesar Rp1 triliun (angka penuh).

- *Term Loan* V sebesar Rp4 triliun (angka penuh) yang memiliki bunga tetap sebesar 6,75% dengan jangka waktu selama 12 bulan dan akan jatuh tempo pada 6 Desember 2024.

Pada tanggal 18 Mei 2022, Bank mendapatkan pinjaman dari PT Bank Central Asia Tbk Jakarta sebesar Rp420 miliar (angka penuh) yang memiliki bunga tetap sebesar 5,23% dan jatuh tempo pada 18 Mei 2025.

Persyaratan-persyaratan penting dalam perjanjian pinjaman Bank antara lain:
- Rasio *Non Performing Loan (NPL)* Bruto tidak melebihi 6%
- Menjaga Rasio *Non Performing Loan (NPL)* Neto sesuai dengan ketentuan yang berlaku
- *Capital Adequacy Ratio (CAR)* minimal 12%
- Laba bersih tahun berjalan dengan angka positif
- Nilai *Liquidity Coverage Ratio* minimal sebesar 100%
- Rasio cakupan *Non Performing Loan (NPL)* tidak kurang dari 100%
- Rasio eksposur kredit tidak melebihi 40%

b. Pinjaman dari Citibank N.A., Jakarta

Akun ini merupakan fasilitas pinjaman yang diperoleh dari Citibank N.A., Jakarta ditujukan untuk mendukung Bank dalam menyalurkan kredit pemilikan rumah di Indonesia.

Pada tanggal 18 Mei 2022, Bank mendapatkan pinjaman sindikasi sebesar Rp140 miliar (angka penuh) yang memiliki bunga tetap sebesar 4,70% dan jatuh tempo pada 18 Mei 2024.

25. FUND BORROWINGS (continued)

a. Loan from PT Bank Central Asia Tbk (continued)

- *The Term Loan IV amounting Rp2 trillion (full amount) with fixed interest rate 5.50% with 36 months period which will mature amounting Rp1 trillion (full amount) on April 25, 2024 and amounting Rp1 trillion (full amount) on May 8, 2024, respectively.*

  The Bank has fully repaid the loan at maturity date on April 25, 2024 and May 8, 2024 for each amounting to Rp1 trillion (full amount).

- *The Term Loan V amounting Rp4 trillion (full amount) with fixed interest rate 6.75% with 12 months period which will mature on December 6, 2024.*

On May 18, 2022, the Bank received loan from PT Bank Central Asia Tbk with plafond amounting to Rp420 billion (full amount) with fixed interest rate of 5.23% and will mature on May 18, 2025.

The significant requirements in the Bank's loan agreement include the following:
- *Gross Non Performing Loan (NPL) ratio shall not exceed 6%*
- *Maintain Net Non Performing Loan (NPL) ratio to comply in accordance with regulations*
- *Capital Adequacy Ratio (CAR) is minimum at least 12%*
- *Net income for the current year with positive numbers*
- *Liquidity Coverage Ratio minimum 100%*
- *Non Performing Loan (NPL) coverage minimum 100%*
- *Open credit exposure ratio shall not exceed than 40%*

b. Loan from Citibank N.A., Jakarta

This account represents loan facility obtained from Citibank N.A., Jakarta which is intended to support Banks in the context of selling housing loans in Indonesia.

On May 18, 2022, the Bank received syndicated loan with plafond amounting to Rp140 billion (full amount) with fixed interest rate of 4.70% and will mature on May 18, 2024, respectively.

25. PINJAMAN YANG DITERIMA (lanjutan)

b. Pinjaman dari Citibank N.A., Jakarta (lanjutan)

Persyaratan-persyaratan penting dalam perjanjian pinjaman Bank antara lain:
- Rasio *Non Performing Loan (NPL)* Bruto tidak melebihi 6%
- Menjaga Rasio *Non Performing Loan (NPL)* Neto sesuai dengan ketentuan yang berlaku
- *Capital Adequacy Ratio (CAR)* minimal 12%
- Laba bersih tahun berjalan dengan angka positif
- Nilai *Liquidity Coverage Ratio* minimal sebesar 100%
- Rasio cakupan *Non Performing Loan (NPL)* tidak kurang dari 100%
- Rasio eksposur kredit tidak melebihi 40%

Bank telah melakukan pelunasan atas pinjaman tersebut saat jatuh tempo pada 18 Mei 2024 masing-masing sebesar Rp140 miliar (angka penuh).

c. Pinjaman dari *Japan International Cooperation Agency*

Akun ini merupakan fasilitas pinjaman yang diperoleh dari Japan International Cooperation Agency ditujukan untuk mendukung penyaluran kredit kepemilikan rumah untuk masyarakat berpenghasilan rendah dan menengah di Indonesia.

Pada tanggal 18 Mei 2022, Bank mendapatkan pinjaman dengan plafon sebesar JPY 7 miliar (angka penuh) atau ekuivalen Rp765.590 dengan bunga tetap sebesar 0,90% dan jatuh tempo pada tanggal 10 Mei 2027.

Persyaratan-persyaratan penting dalam perjanjian pinjaman Bank antara lain:
- Rasio *Non Performing Loan* (NPL) Bruto tidak melebihi 6%
- *Capital Adequacy Ratio* (CAR) minimal 12%
- Laba bersih tahun berjalan dengan angka positif
- Nilai *Liquidity Coverage Ratio* minimal sebesar 100%
- Rasio cakupan *Non Performing Loan* (NPL) tidak kurang dari 100%
- Rasio eksposur kredit tidak melebihi 46%

25. FUND BORROWINGS (continued)

b. Loan from Citibank N.A., Jakarta (continued)

The significant requirements in the Bank's loan agreement include the following:
- *Gross Non Performing Loan (NPL) ratio shall not exceed 6%*
- *Maintain Net Non Performing Loan (NPL) ratio to comply in accordance with regulations*
- *Capital Adequacy Ratio (CAR) is minimum at least 12%*
- *Net income for the current year with positive numbers*
- *Liquidity Coverage Ratio minimum 100%*
- *Non Performing Loan (NPL) coverage minimum 100%*
- *Open credit exposure ratio shall not exceed than 40%*

The Bank has fully repaid the loan at maturity date on May 18, 2024 amounting to Rp140 billion (full amount).

c. Loan from Japan International Cooperation Agency

This account represents loan facility obtained from Japan International Cooperation Agency which is intended to support distributing housing loans for low and middle income communities in Indonesia.

On May 18, 2022, the Bank received loan with plafond amounting to JPY 7 billion (full amount) or the equivalent to Rp765,590 with fixed interest rate of 0.90% and will mature on May 10, 2027, respectively.

The significant requirements in the Bank's loan agreement include the following:
- *Gross Non Performing Loan (NPL) ratio shall not exceed 6%*
- *Capital Adequacy Ratio (CAR) is minimum at least 12%*
- *Net income for the current year with positive numbers*
- *Liquidity Coverage Ratio minimum 100%*
- *Non Performing Loan (NPL) coverage minimum 100%*
- *Open credit exposure ratio shall not exceed than 46%*

25. PINJAMAN YANG DITERIMA (lanjutan)

d. Pinjaman dari PT Bank Danamon Indonesia Tbk

Akun ini merupakan fasilitas pinjaman yang diperoleh dari PT Bank Danamon Indonesia Tbk ditujukan untuk mendukung pengembangan bisnis dan operasional Bank.

Berdasarkan Perjanjian Kredit No. 108/PP/EB/0121 tanggal 17 Februari 2021, Bank mendapatkan pinjaman bilateral dengan plafon sebesar masing-masing Rp500 miliar (angka penuh), Rp500 miliar (angka penuh) dan Rp1.000 miliar (angka penuh) dengan bunga tetap sebesar masing-masing 5,75% dan jatuh tempo masing-masing pada tanggal 22 Agustus 2023, 25 September 2023 dan 24 Desember 2023.

Persyaratan-persyaratan penting dalam perjanjian pinjaman Bank antara lain:

- Mempertahankan minimum Capital Adequacy Ratio CAR sesuai dengan ketentuan regulator yang berlaku
- Rasio Non-Performing Loan (NPL) sesuai dengan ketentuan regulator yang berlaku
- Nilai Liquidity Coverage Ratio sesuai dengan ketentuan regulator yang berlaku

Bank telah melakukan pelunasan atas pinjaman tersebut saat jatuh tempo pada tanggal 22 Agustus 2023 dan 25 September 2023 masing-masing sebesar Rp500 miliar (angka penuh).

Berdasarkan Perjanjian Kredit No. 331/PP/EB/1023 tanggal 6 Oktober 2023, Bank mendapatkan perpanjangan jangka waktu fasilitas kredit serta mendapatkan tambahan fasilitas pinjaman baru sebesar masing-masing Rp1 triliun dengan bunga tetap sebesar 6,85% dan jatuh tempo masing-masing pada tanggal 27 Oktober 2024 dan 24 Juni 2024. Plafon maksimal yang diberikan berdasarkan perjanjian kredit tersebut adalah Rp2 triliun.

Bank telah melakukan pelunasan atas pinjaman tersebut yang jatuh tempo pada tanggal 24 Juni 2024 sebesar Rp1 triliun (angka penuh) sedangkan pinjaman yang jatuh tempo pada tanggal 27 Oktober 2024 telah diperpanjang sampai dengan 27 April 2025. Pada tanggal 28 November 2024, Bank kembali melakukan penarikan fasilitas pinjaman sebesar Rp1 triliun (angka penuh) yang jatuh tempo pada tanggal 28 Mei 2025.

25. FUND BORROWINGS (continued)

d. Loan from PT Bank Danamon Indonesia Tbk

This account represents loan facility obtained from PT Bank Danamon Indonesia Tbk which is intended to support the business and operational development of the Bank.

The loan agreement with PT Bank Danamon Indonesia Tbk has been amended several times. The last amendment was documented under the loan agreement No. 108/PP/EB/0121 dated February 17, 2021, the Bank received a loan with plafond amounting for each Rp500 billion (full amount), Rp500 billion (full amount) and Rp1,000 billion (full amount) with fixed interest rate for each 5.75% and will mature on August 22, 2023, September 25, 2023 and December 24, 2023, respectively.

The significant requirements in the Bank's loan agreement include the following:

- *Capital Adequacy Ratio (CAR) minimum is in accordance with the provisions of the applicable regulator under*
- *Non-Performing Loan (NPL) ratio in accordance with the provisions of the applicable regulator.*
- *Liquidity Coverage Ratio minimum is in accordance with the provisions of the applicable regulator*

The Bank has fully repaid the loan at maturity date on August 22, 2023 and September 25, 2023 with each amounting to Rp500 million (full amount).

Based on loan agreement No. 331PP/EB/1023 dated October 6, 2023, the Bank get involve extending the payment arrangements and get an additional credit facility with plafond amounting for each Rp1 trillion with fixed interest rate of 6.85% and mature for each October 27, 2024 and June 24, 2024. The maximum plafond under the loan agreement is Rp2 trillion.

The Bank has fully prepaid the loan at maturity date on June 24, 2024 with amounting to Rp1 trillion (full amount). Furthermore, the loan will mature on October 27, 2024, has been extended to mature on April 27, 2025. On November 28, 2024, the Bank availed itself of a loan facility amounting to Rp1 trillion (full amount) will mature on May 28, 2025..

25. PINJAMAN YANG DITERIMA (lanjutan)

e. Pinjaman dari PT Sarana Multigriya Finansial (Persero) (SMF)

Bank memiliki beberapa perjanjian pinjaman dengan SMF sebagai berikut:

- Pinjaman SMF Tahap 1 Tahun 2019

  Berdasarkan perjanjian No. 028/PP/SMF-BTN/II/2019 tanggal 12 Februari 2019, Bank mendapatkan pinjaman dengan plafond sebesar Rp1,8 triliun (angka penuh) dengan bunga tetap 9,20% dan akan jatuh tempo pada tanggal 12 Februari 2022.

  Bank telah melakukan pelunasan atas pinjaman tersebut saat jatuh tempo pada tanggal 12 Februari 2022 sebesar Rp1,8 triliun (angka penuh).

- Pinjaman SMF Tahap 2 Tahun 2019

  Berdasarkan perjanjian No. 055/PP/SMF-BTN/IV/2019 tanggal 11 April 2019, Bank mendapatkan pinjaman dengan plafond sebesar Rp1,5 triliun (angka penuh) yang terdiri atas sebesar Rp1 triliun (angka penuh) dan Rp500 miliar (angka penuh) dengan bunga tetap 8,60% yang akan jatuh tempo masing-masing pada tanggal 11 April 2022 dan 2 Mei 2022.

  Bank telah melakukan pelunasan atas pinjaman tersebut saat jatuh tempo masing-masing pada tanggal 11 April 2022 dan 2 Mei 2022 sebesar Rp1 triliun (angka penuh) dan Rp500 miliar (angka penuh).

- Pinjaman SMF Tahap 3 Tahun 2019

  Berdasarkan perjanjian No. 088/PP/SMF-BTN/V/2019 tanggal 29 Mei 2019, Bank mendapatkan pinjaman dengan plafond sebesar Rp1 triliun (angka penuh) dengan bunga tetap 8,79% yang akan jatuh tempo pada tanggal 31 Mei 2022.

  Bank telah melakukan pelunasan atas pinjaman tersebut saat jatuh tempo pada tanggal 31 Mei 2022 sebesar Rp1 triliun (angka penuh).

25. FUND BORROWINGS (continued)

e. Loan from PT Sarana Multigriya Finansial (Persero) (SMF)

The Bank has several loan agreements with SMF as follow:

- *SMF Loan Phase 1 Year 2019*

  Based on loan agreement No. 028/PP/SMF-BTN/II/2019 dated February 12, 2019, the Bank received a loan with plafond amounting to Rp1.8 trillion (full amount) with fixed interest rate of 9.20% and will mature on February 12, 2022.

  The Bank has fully repaid the loan at maturity date on February 12, 2022 amounting to Rp1.8 trillion (full amount).

- *SMF Loan Phase 2 Year 2019*

  Based on loan agreement No. 055/PP/SMF-BTN/IV/2019 dated April 11, 2019, the Bank received a loan with plafond amounting to Rp1.5 trilion (full amount) with details of amounting to Rp1 trilion (full amount) and Rp500 billion (full amount) with interest rate of 8.60% and will mature on April 11, 2022 and May 2, 2022.

  The Bank has fully repaid the loan at maturity date for each on April 11, 2022 and May 2, 2022 and amounting to Rp1 trilion (full amount) and Rp500 billion (full amount).

- *SMF Loan Phase 3 Year 2019*

  Based on loan agreement No. 088/PP/SMF-BTN/V/2019 dated May 29, 2019, the Bank received a loan with plafond amounting to Rp1 trillion (full amount) with fixed interest rate of 8.79% and will mature on May 31, 2022.

  The Bank has fully repaid the loan at maturity date on May 31, 2022 amounting to Rp1 trillion (full amount).

25. PINJAMAN YANG DITERIMA (lanjutan)

e. Pinjaman dari PT Sarana Multigriya Finansial (Persero) (SMF) (lanjutan)

Bank memiliki beberapa perjanjian pinjaman dengan SMF sebagai berikut: (lanjutan)

- Pinjaman SMF Tahap 4 Tahun 2019

  Berdasarkan perjanjian No. 092/PP/SMF-BTN/VII/2019 tanggal 9 Juli 2019, Bank mendapatkan pinjaman dengan plafond sebesar Rp2.095 miliar (angka penuh) yang terdiri atas sebesar Rp640 miliar (angka penuh) dengan bunga tetap 8,87% yang akan jatuh tempo pada tanggal 9 Juli 2022 dan sebesar Rp1.455 miliar (angka penuh) dengan bunga tetap 9,09% yang akan jatuh tempo pada tanggal 9 Juli 2024.

  Bank telah melakukan pelunasan atas pinjaman tersebut saat jatuh tempo pada tanggal 9 Juli 2022 dan 9 Juli 2024 sebesar Rp640 miliar (angka penuh) dan Rp1.455 miliar (angka penuh).

- Pinjaman SMF FLPP 2024

  Berdasarkan perjanjian No. 036/FLPP/SMF/PP/SMF-BTN/II/2024 tanggal 20 Februari 2024, Bank mendapatkan pinjaman dalam rangka penyaluran kredit pemilikan rumah sejahtera untuk masyarakat berpenghasilan rendah.

  Pencairan atas fasilitas ini dilakukan selama *availability period* sampai dengan tanggal 31 Desember 2024. Saldo pada tanggal 31 Desember 2024 adalah sebesar Rp 3.110.879 dengan suku bunga paling rendah sebesar 4.45% dengan jangka waktu paling lama 20 (dua puluh) tahun. Pengembalian dana pinjaman (angsuran pokok dan bunga) kepada SMF dilaksanakan paling lambat tanggal 10 setiap bulannya, apabila tanggal jatuh tempo pembayaran pokok dan bunga jatuh pada hari libur nasional, maka pembayaran dilakukan pada hari kerja sesudah tanggal jatuh tempo pembayaran.

25. FUND BORROWINGS (continued)

e. Loan from PT Sarana Multigriya Finansial (Persero) (SMF) (continued)

The Bank has several loan agreements with SMF as follow: (continued)

- *SMF Loan Phase 4 Year 2019*

  Based on loan agreement No. 092/PP/SMF-BTN/VII/2019 dated July 9, 2019, the Bank received a loan with plafond amounting to Rp2,095 billion (full amount) with details of amounting to Rp640 billion (full amount) with interest rate of 8.87% and will mature on July 9, 2022, and amounting to Rp1,455 billion (full amount) with interest rate of 9.09% and will mature on July 9, 2024.

  The Bank has fully paid the loan at maturity date on July 9, 2022 and July 9, 2024 amounting to Rp640 billion (full amount) and Rp1,455 billion (full amount).

- *Pinjaman SMF FLPP Year 2024*

  Based on loan agreement No. 036/FLPP/SMF/PP/SMF-BTN/II/2024 dated February 20, 2024, the Bank received a loan which is intended for distributing housing loans for low-income communities.

  This disbursement of facility is carried out during the availability period until December 31, 2024. The outstanding balance as of December 31, 2024 is amounting to Rp 3,110,879 with the lowest interest rate of 4.45% for a maximum period of 20 (twenty) years. Loan repayments (principal and interest installments) to SMF is no later than the 10th of each month, if the due date of principal and interest payments falls on a national holiday, the payment is made on the working day after the payment due date.

25. PINJAMAN YANG DITERIMA (lanjutan)

e. Pinjaman dari PT Sarana Multigriya Finansial (Persero) (SMF) (lanjutan)

Bank memiliki beberapa perjanjian pinjaman dengan SMF sebagai berikut: (lanjutan)

- Pinjaman SMF *Mudharabah Muqayadah* FLPP 2024

  Berdasarkan perjanjian No. 038/FLPP/PP/SMF-BTNS/II/2024 dan No. 05/PKS/DIR/2024 tanggal 20 Januari 2024, Bank mendapatkan pinjaman dalam rangka penyaluran kredit pemilikan rumah sejahtera untuk masyarakat berpenghasilan rendah.

  Pencairan atas fasilitas ini dilakukan selama *availability period* sampai dengan tanggal 31 Desember 2024. Saldo pada tanggal 31 Desember 2024 adalah sebesar Rp 1.151.705 dengan nisbah bagi hasil sebesar 22,25% yang dihitung dari pendapatan bagi hasil yang ditawarkan atas fasilitas pembiayaan yang ditarik selama *availability period* atau dengan ekuivalen sebesar setara dengan 4,45% per dengan jangka waktu paling lama 20 (dua puluh) tahun. Pengembalian dana pinjaman (angsuran pokok dan bunga) kepada SMF dilaksanakan paling lambat tanggal 10 setiap bulannya, apabila tanggal jatuh tempo pembayaran pokok dan bunga jatuh pada hari libur nasional, maka pembayaran dilakukan pada hari kerja sesudah tanggal jatuh tempo pembayaran.

- Pinjaman SMF FLPP 2023

  Berdasarkan perjanjian No. 003/FLPP/SMF/PP/SMF-BTN/I/2023 tanggal 6 Januari 2023, Bank mendapatkan pinjaman dalam rangka penyaluran kredit pemilikan rumah sejahtera untuk masyarakat berpenghasilan rendah.

  Pencairan atas fasilitas ini dilakukan selama *availability period* sampai dengan tanggal 29 Desember 2023. Saldo pada tanggal 31 Desember 2024, 2023 adalah sebesar Rp4.573.755 dan Rp4.784.576 dengan suku bunga paling rendah sebesar 4,45% dengan jangka waktu paling lama 20 (dua puluh) tahun. Pengembalian dana pinjaman (angsuran pokok dan bunga) kepada SMF dilaksanakan paling lambat tanggal 10 setiap bulannya, apabila tanggal jatuh tempo pembayaran pokok dan bunga jatuh pada hari libur nasional, maka pembayaran dilakukan pada hari kerja sesudah tanggal jatuh tempo pembayaran.

25. FUND BORROWINGS (continued)

e. Loan from PT Sarana Multigriya Finansial (Persero) (SMF) (continued)

The Bank has several loan agreements with SMF as follow: (continued)

- *SMF Loan Mudharabah Muqayadah FLPP 2024*

  Based on loan agreement No. 038/FLPP/PP/SMF-BTNS/II/2024 and No. 05/PKS/DIR/2024 dated January 20, 2024, the Bank received a loan which is intended for distributing housing loans for low-income communities.

  This disbursement of facility is carried out during the availability period until December 31, 2024. The outstanding balance as of December 31, 2024 is amounting to Rp 1,151,705 with a profit sharing ratio of 22.25%, which is calculated from profit sharing income offered for financing facilities drawn during availability period or an equivalent of 4.45% per annum for a maximum period of 20 (twenty) years. Loan repayments (principal and interest instalments) to SMF are held no later than the 10th of each month, if the due date of principal and interest payments falls on a national holiday, the payment is made on the working day after the payment due date.

- *SMF FLPP Year 2023*

  Based on loan agreement No. 003/FLPP/SMF/PP/SMF-BTN/I/2023 dated January 6, 2023, the Bank received a loan which is intended for distributing housing loans for low-income communities.

  This disbursement of facility is carried out during the availability period until December 29, 2023. The outstanding balance as of December 31, 2024 and 2023 is amounting to Rp4,573,755 and Rp4,784,576 with the lowest interest rate of 4.45% for a maximum period of 20 (twenty) years. Loan repayments (principal and interest installments) to SMF is no later than the 10th of each month, if the due date of principal and interest payments falls on a national holiday, the payment is made on the working day after the payment due date.

25. PINJAMAN YANG DITERIMA (lanjutan)

e. Pinjaman dari PT Sarana Multigriya Finansial (Persero) (SMF) (lanjutan)

Bank memiliki beberapa perjanjian pinjaman dengan SMF sebagai berikut: (lanjutan)

- Pinjaman SMF *Mudharabah Muqayadah* FLPP 2023

  Berdasarkan perjanjian No. 006/FLPP/PP/SMF-BTNS/I/2023 dan No. 03/PKS/DIR/2023 tanggal 17 Januari 2023, Bank mendapatkan pinjaman dalam rangka penyaluran kredit pemilikan rumah sejahtera untuk masyarakat berpenghasilan rendah.

  Pencairan atas fasilitas ini dilakukan selama *availability period* sampai dengan tanggal 29 Desember 2023. Saldo pada tanggal 31 Desember 2024 and 2023 adalah sebesar Rp1.257.315 dan Rp Rp1.316.435 dengan nisbah bagi hasil sebesar 22,25% yang dihitung dari pendapatan bagi hasil yang ditawarkan atas fasilitas pembiayaan yang ditarik selama *availability period* atau dengan ekuivalen sebesar setara dengan 4,45% per dengan jangka waktu paling lama 20 (dua puluh) tahun. Pengembalian dana pinjaman (angsuran pokok dan bunga) kepada SMF dilaksanakan paling lambat tanggal 10 setiap bulannya, apabila tanggal jatuh tempo pembayaran pokok dan bunga jatuh pada hari libur nasional, maka pembayaran dilakukan pada hari kerja sesudah tanggal jatuh tempo pembayaran.

25. FUND BORROWINGS (continued)

e. Loan from PT Sarana Multigriya Finansial (Persero) (SMF) (continued)

The Bank has several loan agreements with SMF as follow: (continued)

- *SMF Loan Mudharabah Muqayadah FLPP 2023*

  Based on loan agreement No. 006/FLPP/PP/SMF-BTNS/I/2023 and No. 03/PKS/DIR/2023 dated January 17, 2023, the Bank received a loan which is intended for distributing housing loans for low-income communities.

  This disbursement of facility is carried out during the availability period until December 29, 2023. The outstanding balance as of December 31, 2024 and 2023 is amounting to Rp1,257,315 and Rp1,316,435 with a profit sharing ratio of 22.25%, which is calculated from profit sharing income offered for financing facilities drawn during availability period or an equivalent of 4.45% per annum for a maximum period of 20 (twenty) years. Loan repayments (principal and interest instalments) to SMF are held no later than the 10th of each month, if the due date of principal and interest payments falls on a national holiday, the payment is made on the working day after the payment due date.

25. PINJAMAN YANG DITERIMA (lanjutan)

e. Pinjaman dari PT Sarana Multigriya Finansial (Persero) (SMF) (lanjutan)

Bank memiliki beberapa perjanjian pinjaman dengan SMF sebagai berikut: (lanjutan)

- Pinjaman SMF FLPP 2022

  Berdasarkan perjanjian No. 016/FLPP/PP/SMF-BTN/I/2022 dan No. 02/PKS/DIR/ 2022 tanggal 6 Januari 2022, Bank mendapatkan pinjaman dalam rangka penyaluran kredit pemilikan rumah sejahtera untuk masyarakat berpenghasilan rendah.

  Pencairan atas fasilitas ini dilakukan selama *availability period* sampai dengan tanggal 31 Desember 2022. Saldo pada tanggal 31 Desember 2024, 2023, dan 2022 adalah sebesar Rp4.100.677, Rp4.302.198 dan Rp4.493.322 dengan suku bunga paling rendah sebesar 4,45% dengan jangka waktu paling lama 20 (dua puluh) tahun. Pengembalian dana pinjaman (angsuran pokok dan bunga) kepada SMF dilaksanakan paling lambat tanggal 10 setiap bulannya, apabila tanggal jatuh tempo pembayaran pokok dan bunga jatuh pada hari libur nasional, maka pembayaran dilakukan pada hari kerja sesudah tanggal jatuh tempo pembayaran.

- Pinjaman SMF *Mudharabah Muqayadah* FLPP 2022

  Berdasarkan perjanjian No. 017/FLPP/ AKAD/SMF-BTNS/I/2022 dan No. 04/ PKS/DIR/2022 tanggal 6 Januari 2022, Bank mendapatkan pinjaman dalam rangka penyaluran kredit pemilikan rumah sejahtera untuk masyarakat berpenghasilan rendah.

25. FUND BORROWINGS (continued)

e. Loan from PT Sarana Multigriya Finansial (Persero) (SMF) (continued)

The Bank has several loan agreements with SMF as follow: (continued)

- *SMF FLPP Year 2022*

  Based on loan agreement No. 016/FLPP/PP/SMF-BTN/I/2022 and No. 02/PKS/DIR/2022 dated January 6, 2022, the Bank received a loan which is intended for distributing housing loans for low-income communities.

  This disbursement of facility is carried out during the availability period until December 31, 2022. The outstanding balance as of December 31, 2024, 2023 and 2022 is amounting to Rp4,100,677, Rp4,302,198, and Rp4.493.322 with the lowest interest rate of 4.45% for a maximum period of 20 (twenty) years. Loan repayments (principal and interest installments) to SMF is no later than the 10th of each month, if the due date of principal and interest payments falls on a national holiday, the payment is made on the working day after the payment due date.

- *SMF Loan Mudharabah Muqayadah FLPP 2022*

  Based on loan agreement No. 017/FLPP/AKAD/SMF-BTNS/I/2022 and No. 04/PKS/DIR/2022 dated January 6, 2022, the Bank received a loan which is intended for distributing housing loans for low-income communities.

25. PINJAMAN YANG DITERIMA (lanjutan)

e. Pinjaman dari PT Sarana Multigriya Finansial (Persero) (SMF) (lanjutan)

Bank memiliki beberapa perjanjian pinjaman dengan SMF sebagai berikut (lanjutan):

- Pinjaman SMF *Mudharabah Muqayadah* FLPP 2022 (lanjutan)

  Pencairan atas fasilitas ini dilakukan selama *availability period* sampai dengan tanggal 31 Desember 2022. Saldo pada tanggal 31 Desember 2024, 2023, dan 2022 adalah sebesar Rp896.549, Rp944.879, dan Rp990.267 dengan nisbah bagi hasil sebesar 22,25% yang dihitung dari pendapatan bagi hasil yang ditawarkan atas fasilitas pembiayaan yang ditarik selama *availability period* atau dengan ekuivalen sebesar setara dengan 4,45% per dengan jangka waktu paling lama 20 (dua puluh) tahun. Pengembalian dana pinjaman (angsuran pokok dan bunga) kepada SMF dilaksanakan paling lambat tanggal 10 setiap bulannya, apabila tanggal jatuh tempo pembayaran pokok dan bunga jatuh pada hari libur nasional, maka pembayaran dilakukan pada hari kerja sesudah tanggal jatuh tempo pembayaran.

- Pinjaman SMF FLPP 2021

  Berdasarkan perjanjian No. 069/FLPP/ PP/SMF-BTN/IV/2021 tanggal 14 April 2021, Bank mendapatkan pinjaman dalam rangka penyaluran kredit pemilikan rumah sejahtera untuk masyarakat berpenghasilan rendah.

  Pencairan atas fasilitas ini dilakukan selama *availability period* sampai dengan tanggal 31 Desember 2021. Saldo pada tanggal 31 Desember 2024, 2023, dan 2022 adalah sebesar Rp3.004.779, Rp3.170.553, dan Rp3.328.337 dengan suku bunga paling rendah sebesar 4,45% dengan jangka waktu paling lama 20 (dua puluh) tahun. Pengembalian dana pinjaman (angsuran pokok dan bunga) kepada SMF dilaksanakan paling lambat tanggal 10 setiap bulannya, apabila tanggal jatuh tempo pembayaran pokok dan bunga jatuh pada hari libur nasional, maka pembayaran dilakukan pada hari kerja sesudah tanggal jatuh tempo pembayaran.

25. FUND BORROWINGS (continued)

e. Loan from PT Sarana Multigriya Finansial (Persero) (SMF) (continued)

The Bank has several loan agreements with SMF as follow (continued):

- *SMF Loan Mudharabah Muqayadah FLPP 2022 (continued)*

  This disbursement of facility is carried out during the availability period until December 31, 2022. The outstanding balance as of December 31, 2024, 2023, and 2022 is amounting to Rp896,549, Rp944,879 and Rp990.267 with a profit sharing ratio of 22.25%, which is calculated from profit sharing income offered for financing facilities drawn during availability period or an equivalent of 4.45% per annum for a maximum period of 20 (twenty) years. Loan repayments (principal and interest instalments) to SMF are held no later than the 10th of each month, if the due date of principal and interest payments falls on a national holiday, the payment is made on the working day after the payment due date.

- *SMF Loan FLPP 2021*

  Based on loan agreement No. 069/FLPP/ PP/SMF-BTN/IV/2021 dated April 14, 2021, the Bank received a loan which is intended for distributing housing loans for low-income communities.

  This disbursement of facility is carried out during the availability period until December 31, 2021. The outstanding balance as of December 31, 2024, 2023, and 2022 is amounting to Rp3,004,779, Rp3,170,553, and Rp3.328.337 with the lowest interest rate of 4.45% for a maximum period of 20 (twenty) years. Loan repayments (principal and interest installments) to SMF is no later than the 10th of each month, if the due date of principal and interest payments falls on a national holiday, the payment is made on the working day after the payment due date.

25. PINJAMAN YANG DITERIMA (lanjutan)

e. Pinjaman dari PT Sarana Multigriya Finansial (Persero) (SMF) (lanjutan)

Bank memiliki beberapa perjanjian pinjaman dengan SMF sebagai berikut (lanjutan):

- Pinjaman SMF FLPP 2020

  Berdasarkan perjanjian No. 010/FLPP/PP/SMF-BTN/I/2020 tanggal 20 Januari 2020, Bank mendapatkan pinjaman dalam rangka penyaluran kredit pemilikan rumah Sejahtera untuk masyarakat berpenghasilan rendah.

  Pencairan atas fasilitas ini dilakukan selama *availability period* sampai dengan tanggal 31 Desember 2020. Saldo pada tanggal 31 Desember 2024, 2023 dan 2022 adalah sebesar Rp763.064, Rp809.252, dan Rp854.264 dengan suku bunga paling rendah sebesar 4,45% dengan jangka waktu paling lama 15 (lima belas) tahun. Pengembalian dana pinjaman (angsuran pokok dan bunga) kepada SMF dilaksanakan paling lambat tanggal 10 setiap bulannya, apabila tanggal jatuh tempo pembayaran pokok dan bunga jatuh pada hari libur nasional, maka pembayaran dilakukan pada hari kerja sesudah tanggal jatuh tempo pembayaran.

- Pinjaman SMF *Mudharabah Muqayadah* FLPP 2021

  Berdasarkan perjanjian No. 069A/FLPP/AKAD/SMF-BTN/IV/2021 tanggal 21 April 2021, Bank mendapatkan pinjaman dalam rangka penyaluran kredit pemilikan rumah sejahtera untuk masyarakat berpenghasilan rendah.

25. FUND BORROWINGS (continued)

e. Loan from PT Sarana Multigriya Finansial (Persero) (SMF) (continued)

The Bank has several loan agreements with SMF as follow (continued):

- *SMF FLPP Year 2020*

  Based on loan agreement No. 010/FLPP/PP/SMF-BTN/I/2020 dated January 20, 2020, the Bank received a loan which is intended for distributing housing loans for low-income communities.

  This disbursement of facility is carried out during the availability period until December 31, 2020. The outstanding balance as of December 31, 2024, 2023, and 2022 is amounting to Rp763,064 , Rp809,252, and Rp854.264 with the lowest interest rate of 4.45% for a maximum period of 15 (fifteen) years. Loan repayments (principal and interest instalments) to SMF is no later than the 10th of each month, if the due date of principal and interest payments falls on a national holiday, the payment is made on the working day after the payment due date.

- *SMF Loan Mudharabah Muqayadah FLPP 2021*

  Based on loan agreement No. 069A/FLPP/AKAD/SMF-BTN/IV/2021 dated April 21, 2021, the Bank received a loan which is intended for distributing housing loans for low-income communities.

25. PINJAMAN YANG DITERIMA (lanjutan)

e. Pinjaman dari PT Sarana Multigriya Finansial (Persero) (pihak berelasi) (SMF) (lanjutan)

Bank memiliki beberapa perjanjian pinjaman dengan SMF sebagai berikut (lanjutan):

- Pinjaman SMF *Mudharabah Muqayadah* FLPP 2021 (lanjutan)

  Pencairan atas fasilitas ini dilakukan selama *availability period* sampai dengan tanggal 31 Desember 2021. Saldo pada tanggal 31 Desember 2024, 2023, and 2022 adalah sebesar Rp633.120, Rp673.030, Rp710.998 dengan nisbah bagi hasil sebesar 22,25% yang dihitung dari pendapatan bagi hasil yang ditawarkan atas fasilitas pembiayaan yang ditarik selama *availability period* atau dengan ekuivalen sebesar setara dengan 4,45% per dengan jangka waktu paling lama 15 (lima belas) tahun. Pengembalian dana pinjaman (angsuran pokok dan bunga) kepada SMF dilaksanakan paling lambat tanggal 10 setiap bulannya, apabila tanggal jatuh tempo pembayaran pokok dan bunga jatuh pada hari libur nasional, maka pembayaran dilakukan pada hari kerja sesudah tanggal jatuh tempo pembayaran.

- *Refinancing* 1 SMF 2021

  Berdasarkan perjanjian No.124/PP/SMF-BTN/VI/2021 tanggal 30 Juni 2021, Bank mendapatkan pinjaman dengan plafon sebesar Rp500 miliar (angka penuh) dan Rp1.000 miliar (angka penuh) dengan bunga tetap 5,70% dan 5.95% yang akan jatuh tempo pada tanggal 30 Juni 2023 dan 30 Juni 2024.

  Bank telah melakukan pelunasan atas pinjaman tersebut saat jatuh tempo pada tanggal 30 Juni 2023 dan 2024 masing-masing sebesar Rp500 miliar (angka penuh).

25. FUND BORROWINGS (continued)

e. Loan from PT Sarana Multigriya Finansial (Persero) (related parties) (SMF) (continued)

The Bank has several loan agreements with SMF as follow (continued):

- *SMF Loan Mudharabah Muqayadah FLPP 2021 (continued)*

  This disbursement of facility is carried out during the availability period until December 31, 2021. The outstanding balance as of December 31, 2024, 2023, and 2022 amounting to Rp633,120, Rp673,030, and Rp710.998 with a profit sharing ratio of 22.25%, which is calculated from profit sharing income offered for financing facilities drawn during availability period or an equivalent of 4.45% per annum for a maximum period of 15 (fifteen) years. Loan repayments (principal and interest instalments) to SMF are held no later than the 10th of each month, if the due date of principal and interest payments falls on a national holiday, the payment is made on the working day after the payment due date.

- *Refinancing 1 SMF 2021*

  Based on loan agreement No.124/PP/SMF-BTN/VI/2021 dated June 30, 2021, the Bank received a loan with plafond amounting to Rp500 billion (full amount) and Rp1,000 billion (full amount) with interest rate of 5.70% and 5.95% and will mature on June 30, 2023 and June 30, 2024.

  The Bank has fully repaid the loan at maturity date on June 30, 2023 and 2024 amounting to Rp500 billion (full amount), respectively.

25. PINJAMAN YANG DITERIMA (lanjutan)

e. Pinjaman dari PT Sarana Multigriya Finansial (Persero) (pihak berelasi) (SMF) (lanjutan)

Bank memiliki beberapa perjanjian pinjaman dengan SMF sebagai berikut (lanjutan):

- *Refinancing* 2 SMF 2021

  Berdasarkan perjanjian No.254/PP/SMF-BTN/XII/2021 tanggal 28 Desember 2021, Bank mendapatkan pinjaman dengan plafon sebesar Rp200 miliar (angka penuh) dengan bunga tetap 4% yang akan jatuh tempo pada tanggal 28 Desember 2022.

  Bank telah melakukan pelunasan atas pinjaman tersebut saat jatuh tempo pada tanggal 28 Desember 2022 sebesar Rp200 miliar (angka penuh).

- *Refinancing* 1 SMF 2022

  Berdasarkan perjanjian No.119/PP/SMF-BTN/IV/2022 tanggal 28 April 2022, Bank mendapatkan pinjaman dengan plafon sebesar Rp2 triliun (angka penuh) dengan bunga tetap 5,60% yang akan jatuh tempo pada tanggal 28 April 2025.

- Pinjaman SMF FLPP 2019

  Berdasarkan perjanjian No. 099/PP/FLPP/SMF-BTN/I/2019 tanggal 17 Januari 2019, Bank mendapatkan pinjaman dalam rangka penyaluran kredit pemilikan rumah sejahtera untuk masyarakat berpenghasilan rendah.

  Pencairan atas fasilitas ini dilakukan selama *availability period* sampai dengan tanggal 31 Desember 2019. Saldo pada tanggal 31 Desember 2024, 2023, dan 2022 adalah sebesar Rp703.556, Rp755.927, dan Rp803.296 dengan suku bunga paling rendah sebesar 4,45% dengan jangka waktu paling lama 15 (lima belas) tahun. Pengembalian dana pinjaman (angsuran pokok dan bunga) kepada SMF dilaksanakan paling lambat tanggal 10 setiap bulannya, apabila tanggal jatuh tempo pembayaran pokok dan bunga jatuh pada hari libur nasional, maka pembayaran dilakukan pada hari kerja sesudah tanggal jatuh tempo pembayaran.

25. FUND BORROWINGS (continued)

e. Loan from PT Sarana Multigriya Finansial (Persero) (related parties) (SMF) (continued)

The Bank has several loan agreements with SMF as follow (continued):

- *Refinancing 2 SMF 2021*

  Based on loan agreement No.254/PP/SMF-BTN/XII/2021 dated December 28, 2021, the Bank received a loan with plafond amounting to Rp200 billion (full amount) with interest rate of 4% and will mature on December 28, 2022.

  The Bank has fully repaid the loan at maturity date on December 28, 2022 amounting to Rp200 billion (full amount).

- *Refinancing 1 SMF 2022*

  Based on loan agreement No. 119/PP/SMF-BTN/IV/2022 dated April 28, 2022, the Bank received a loan with plafond amounting to Rp2 trillion (full amount) with interest rate of 5.60% and will mature on April 28, 2025.

- *SMF Loan FLPP 2019*

  Based on loan agreement 099/PP/FLPP/SMF-BTN/I/2019 dated January 17, 2019, the Bank received a loan which is intended for distributing housing loans for low-income communities.

  This disbursement of facility is carried out during the availability period until December 31, 2019. The outstanding balance as of December 31, 2024, 2023, and 2022 is amounting to Rp703,556, Rp755,927, and Rp803.296 respectively, with the lowest interest rate of 4.45% for a maximum period of 15 (fifteen) years. Loan repayments (principal and interest installments) to SMF is no later than the 10th of each month, if the due date of principal and interest payments falls on a national holiday, the payment is made on the working day after the payment due date.

25. PINJAMAN YANG DITERIMA (lanjutan)

e. Pinjaman dari PT Sarana Multigriya Finansial (Persero) (SMF) (lanjutan)

Bank memiliki beberapa perjanjian pinjaman dengan SMF sebagai berikut (lanjutan):

- Pinjaman SMF *Mudharabah Muqayadah*

  Berdasarkan perjanjian No. 179/AKAD/ SMF-BTNS/IX/2021 tanggal 15 September 2021, Bank mendapatkan pinjaman dengan plafon sebesar Rp100 miliar (angka penuh) dengan nisbah bagi hasil sebesar 53,17% dan akan jatuh tempo pada tanggal 16 September 2022.

  Bank telah melakukan pelunasan atas pinjaman tersebut saat jatuh tempo pada tanggal 16 September 2022 sebesar Rp100 miliar (angka penuh).

- Pinjaman SMF *Mudharabah Muqayadah* FLPP 2020

  Berdasarkan perjanjian No. 024/FLPP/AKAD/SMF-BTNSy/I/2020 tanggal 29 Januari 2020, Bank mendapatkan pinjaman dalam rangka penyaluran kredit pemilikan rumah sejahtera untuk masyarakat berpenghasilan rendah.

  Pencairan atas fasilitas ini dilakukan selama *availability period* sampai dengan tanggal 31 Desember 2020. Saldo pada tanggal 31 Desember 2024, 2023, dan 2022 adalah sebesar Rp147.313, Rp158.041, and Rp168.256 dengan *nisbah* bagi hasil sebesar 22,25% yang dihitung dari pendapatan bagi hasil yang ditawarkan atas fasilitas pembiayaan yang ditarik selama *availability period* atau dengan ekuivalen sebesar setara dengan 4,45% per tahun dengan pendapatan yang dibagihasilkan yang menggunakan rata-rata tingkat imbal hasil kas efektif dari Pembiayaan KPR Sejahtera sebesar setara dengan 5% per tahun dengan jangka waktu paling lama 15 (lima belas) tahun. Pengembalian dana pinjaman (angsuran pokok dan bunga) kepada SMF dilaksanakan paling lambat tanggal 10 setiap bulannya, apabila tanggal jatuh tempo pembayaran pokok dan bunga jatuh pada hari libur nasional, maka pembayaran dilakukan pada hari kerja sesudah tanggal jatuh tempo pembayaran.

25. FUND BORROWINGS (continued)

e. Loan from PT Sarana Multigriya Finansial (Persero) (SMF) (continued)

The Bank has several loan agreements with SMF as follow (continued):

- *SMF Loan Mudharabah Muqayadah*

  Based on loan agreement No. 179/AKAD/ SMF-BTNS/IX/2021 dated September 15, 2021, the Bank received loan with plafond amounting to Rp100 bilion (full amount) with nisbah ratio 53.17% and will mature on September 16, 2022.

  The Bank has fully repaid the loan at maturity date on September 16, 2022 amounting to Rp100 billion (full amount).

- *SMF Loan Mudharabah Muqayadah FLPP 2020*

  Based on loan agreement No. 024/FLPP/AKAD/SMF-BTNSy/I/2020 dated January 29, 2020, the Bank received a loan which is intended for distributing housing loans for low-income communities.

  This disbursement of facility is carried out during the availability period until December 31, 2020. The outstanding balance as of December 31, 2024, 2023, and 2022 is amounting to Rp147,313, Rp158,041, and Rp168.256 with a profit sharing ratio of 22.25%, which is calculated from profit sharing income offered for financing facilities drawn during availability period or an equivalent of 4.45% per annum with revenue divided by using the average yield rate effective financing for KPR Sejahtera Financing equal to 5% per year for a maximum period of 15 (fifteen) years. Loan repayments (principal and interest instalments) to SMF are held no later than the 10th of each month, if the due date of principal and interest payments falls on a national holiday, the payment is made on the working day after the payment due date.

25. PINJAMAN YANG DITERIMA (lanjutan)

e. Pinjaman dari PT Sarana Multigriya Finansial (Persero) (SMF) (lanjutan)

Bank memiliki beberapa perjanjian pinjaman dengan SMF sebagai berikut (lanjutan):

- Pinjaman SMF FLPP 2018

  Berdasarkan perjanjian No. 81/PP/SMF-BTN/VIII/2018 tanggal 14 Agustus 2018, Bank mendapatkan pinjaman dalam rangka penyaluran kredit pemilikan rumah sejahtera untuk masyarakat berpenghasilan rendah.

  Pencairan atas fasilitas ini dilakukan selama *availability period* sampai dengan tanggal 28 Desember 2018. Saldo pada tanggal 31 Desember 2024, 2023, dan 2022 adalah sebesar Rp531.496, Rp571.300, dan Rp607.414 dengan suku bunga paling rendah sebesar 4,45% dengan jangka waktu paling lama 15 (lima belas) tahun. Pengembalian dana pinjaman (angsuran pokok dan bunga) kepada SMF dilaksanakan paling lambat tanggal 10 setiap bulannya, apabila tanggal jatuh tempo pembayaran pokok dan bunga jatuh pada hari libur nasional, maka pembayaran dilakukan pada hari kerja sesudah tanggal jatuh tempo pembayaran.

- Pinjaman SMF *Mudharabah Muqayadah* FLPP 2018

  Berdasarkan perjanjian No.103A/AKAD/ SMF-BTNSy/VIII/2018 tanggal 14 Agustus 2018, Bank mendapatkan pinjaman dalam rangka penyaluran kredit pemilikan rumah sejahtera untuk masyarakat berpenghasilan rendah.

25. FUND BORROWINGS (continued)

e. Loan from PT Sarana Multigriya Finansial (Persero) (SMF) (continued)

The Bank has several loan agreements with SMF as follow (continued):

- *SMF Loan FLPP 2018*

  Based on loan agreement No. 81/PP/SMF-BTN/VIII/2018 dated August 14, 2018, the Bank received a loan which is intended for distributing housing loans for low-income communities.

  This disbursement of facility is carried out during the availability period until December 28, 2018. The outstanding balance as of December 31, 2024 and 2023, and 2022 is amounting Rp531,496, Rp571,300, and Rp607,414, respectively with the lowest interest rate of 4.45% for a maximum period of 15 (fifteen) years. Loan repayments (principal and interest instalments) to the SMF are held no later than the 10th of each month, if the due date of principal and interest payments falls on a national holiday, the payment is made on the working day after the payment due date.

- *SMF Loan Mudharabah Muqayadah FLPP 2018*

  Based on loan agreement No.103A/ AKAD/SMF-BTNSy/VIII/2018 dated August 14, 2018, the Bank received a loan which is intended for distributing housing loans for low-income communities.

25. PINJAMAN YANG DITERIMA (lanjutan)

e. Pinjaman dari PT Sarana Multigriya Finansial (Persero) (SMF) (lanjutan)

Bank memiliki beberapa perjanjian pinjaman dengan SMF sebagai berikut (lanjutan):

- Pinjaman SMF *Mudharabah Muqayadah* FLPP 2018 (lanjutan)

  Pencairan atas fasilitas ini dilakukan selama *availability period* sampai dengan tanggal 28 Desember 2018. Saldo pada tanggal 31 Desember 2024, 2023, dan 2022 adalah sebesar Rp22.769, Rp24.733 dan Rp26.616 dengan *nisbah* bagi hasil sebesar 22,25% yang dihitung dari pendapatan bagi hasil yang ditawarkan atas fasilitas pembiayaan yang ditarik selama *availability period* atau dengan ekuivalen sebesar setara dengan 4,45% per tahun dengan pendapatan yang dibagihasilkan yang menggunakan rata-rata tingkat imbal hasil kas efektif dari Pembiayaan KPR Sejahtera sebesar setara dengan 5% per tahun dengan jangka waktu paling lama 15 (lima belas) tahun. Pengembalian dana pinjaman (angsuran pokok dan bunga) kepada SMF dilaksanakan paling lambat tanggal 10 setiap bulannya, apabila tanggal jatuh tempo pembayaran pokok dan bunga jatuh pada hari libur nasional, maka pembayaran dilakukan pada hari kerja sesudah tanggal jatuh tempo pembayaran.

- Pinjaman SMF Mudharabah Muqayadah FLPP 2019

  Berdasarkan perjanjian No. 017A/AKAD/ FLPP/SMF-BTNSy/I/2019 tanggal 21 Januari 2019, Bank mendapatkan pinjaman dalam rangka penyaluran kredit pemilikan rumah sejahtera untuk masyarakat berpenghasilan rendah.

25. FUND BORROWINGS (continued)

e. Loan from PT Sarana Multigriya Finansial (Persero) (SMF) (continued)

The Bank has several loan agreements with SMF as follow (continued):

- *SMF Loan Mudharabah Muqayadah FLPP 2018 (continued)*

  *This disbursement of facility is carried out during the availability period until December 28, 2018. The outstanding balance as of December 31, 2024, 2023, and 2022, is amounting to Rp22,769, Rp24,733, Rp26,*616, *respectively with a profit sharing ratio of 22.25%, which is calculated from profit sharing income offered for financing facilities drawn during availability period or an equivalent of 4.45% per annum with revenue divided by using the average yield rate effective cash financing for KPR Sejahtera Financing equal to 5% per year for a maximum period of 15 (fifteen) years. Loan repayments (principal and interest instalments) to the SMF are held no later than the 10th of each month, if the due date of principal and interest payments falls on a national holiday, the payment is made on the working day after the payment due date.*

- *SMF Loan Mudharabah Muqayadah FLPP 2019*

  Based on loan agreement No. 017A/ AKAD/FLPP/SMF-BTNSy/I/2019 dated January 21, 2019, the Bank received a loan which is intended for distributing housing loans for low-income communities.

25. PINJAMAN YANG DITERIMA (lanjutan)

e. Pinjaman dari PT Sarana Multigriya Finansial (Persero) (SMF) (lanjutan)

Bank memiliki beberapa perjanjian pinjaman dengan SMF sebagai berikut (lanjutan):

- Pinjaman SMF *Mudharabah Muqayadah* FLPP 2019 (lanjutan)

  Pencairan atas fasilitas ini dilakukan selama *availability period* sampai dengan tanggal 31 Desember 2019. Saldo pada tanggal 31 Desember 2024, 2023, dan 2022 adalah sebesar Rp82.004, Rp88.938, dan Rp95.575 dengan *nisbah* bagi hasil sebesar 22,25% yang dihitung dari pendapatan bagi hasil yang ditawarkan atas fasilitas pembiayaan yang ditarik selama *availability period* atau dengan ekuivalen sebesar setara dengan 4,45% per tahun dengan pendapatan yang dibagihasilkan yang menggunakan rata-rata tingkat imbal hasil kas efektif dari Pembiayaan KPR Sejahtera sebesar setara dengan 5% per tahun dengan jangka waktu paling lama 15 (lima belas) tahun. Pengembalian dana pinjaman (angsuran pokok dan bunga) kepada SMF dilaksanakan paling lambat tanggal 10 setiap bulannya, apabila tanggal jatuh tempo pembayaran pokok dan bunga jatuh pada hari libur nasional, maka pembayaran dilakukan pada hari kerja sesudah tanggal jatuh tempo pembayaran.

- Pinjaman SMF *Mudharabah Muqayadah* FLPP Percepatan 2019

  Berdasarkan perjanjian No. 216/FLPP/AKAD/SMF-BTN/XII/2019 tanggal 20 Desember 2019, Bank mendapatkan pinjaman dalam rangka penyaluran kredit pemilikan rumah sejahtera untuk masyarakat berpenghasilan rendah.

25. FUND BORROWINGS (continued)

e. Loan from PT Sarana Multigriya Finansial (Persero) (SMF) (continued)

The Bank has several loan agreements with SMF as follow (continued):

- *SMF Loan Mudharabah Muqayadah FLPP 2019 (continued)*

  This disbursement of facility is carried out during the availability period until December 31, 2019. The outstanding balance as of December 31, 2024, 2023, and 2022 is Rp82,004, Rp88,938, and Rp95,575, respectively with a profit sharing ratio of 22.25%, which is calculated from profit sharing income offered for financing facilities drawn during availability period or an equivalent of 4.45% per annum with revenue divided by using the average yield rate effective cash financing for KPR Sejahtera Financing equal to 5% per year for a maximum period of 15 (fifteen) years. Loan repayments (principal and interest instalments) to the SMF are held no later than the 10th of each month, if the due date of principal and interest payments falls on a national holiday, the payment is made on the working day after the payment due date.

- *SMF Loan Mudharabah Muqayadah FLPP Percepatan 2019*

  Based on loan agreement No. 216/FLPP/AKAD/SMF-BTN/XII/2019 dated December 20, 2019, the Bank received loan which is intended for distributing housing loans for low-income communities.

25. PINJAMAN YANG DITERIMA (lanjutan)

e. Pinjaman dari PT Sarana Multigriya Finansial (Persero) (SMF) (lanjutan)

Bank memiliki beberapa perjanjian pinjaman dengan SMF sebagai berikut (lanjutan):

- Pinjaman SMF *Mudharabah Muqayadah* FLPP Percepatan 2019 (lanjutan)

  Pencairan atas fasilitas ini dilakukan selama *availability period* sampai dengan tanggal 31 Desember 2019. Saldo pada tanggal 31 Desember 2024, 2023, and 2022 adalah sebesar Rp22.668, Rp24.497, dan Rp26.238 dengan nisbah bagi hasil sebesar 22,25% yang dihitung dari pendapatan bagi hasil yang ditawarkan atas fasilitas pembiayaan yang ditarik selama *availability period* atau dengan ekuivalen sebesar setara dengan 4,45% per tahun dengan pendapatan yang dibagihasilkan yang menggunakan ratarata tingkat imbal hasil kas efektif dari Pembiayaan KPR Sejahtera sebesar setara dengan 5% per tahun dengan jangka waktu paling lama 15 (lima belas) tahun. Pengembalian dana pinjaman (angsuran pokok dan bunga) kepada SMF dilaksanakan paling lambat tanggal 10 setiap bulannya, apabila tanggal jatuh tempo pembayaran pokok dan bunga jatuh pada hari libur nasional, maka pembayaran dilakukan pada hari kerja sesudah tanggal jatuh tempo pembayaran.

- Pinjaman SMF FLPP Percepatan 2019

  Berdasarkan perjanjian No. 203/FLPP/PP/ SMF-BTN/XI/2019 tanggal 28 November 2019, Bank mendapatkan pinjaman dalam rangka penyaluran kredit pemilikan rumah sejahtera untuk masyarakat berpenghasilan rendah.

25. FUND BORROWINGS (continued)

e. Loan from PT Sarana Multigriya Finansial (Persero) (SMF) (continued)

The Bank has several loan agreements with SMF as follow (continued):

- *SMF Loan Mudharabah Muqayadah FLPP Percepatan 2019 (continued)*

  This disbursement of facility is carried out during the availability period until December 31, 2019. The outstanding balance as of December 31, 2024, 2023, and 2022 is Rp22,668, Rp24,497, and Rp26,238 with a profit sharing ratio of 22.25%, which is calculated from profit sharing income offered for financing facilities drawn during availability period or an equivalent of 4.45% per annum with revenue divided by using the average yield rate effective cash financing for KPR Sejahtera Financing equal to 5% per year for a maximum period of 15 (fifteen) years. Loan repayments (principal and interest instalments) to the SMF are held no later than the 10th of each month, if the due date of principal and interest payments falls on a national holiday, the payment is made on the working day after the payment due date.

- *SMF Loan FLPP Percepatan 2019*

  Based on loan agreement No. 203/FLPP/PP/SMF-BTN/XI/2019 dated November 28, 2019, the Bank received a loan which is intended for distributing housing loans for low-income communities.

25. PINJAMAN YANG DITERIMA (lanjutan)

e. Pinjaman dari PT Sarana Multigriya Finansial (Persero) (SMF) (lanjutan)

Bank memiliki beberapa perjanjian pinjaman dengan SMF sebagai berikut (lanjutan):

- Pinjaman SMF FLPP Percepatan 2019 (lanjutan)

  Pencairan atas fasilitas ini dilakukan selama *availability period* sampai dengan tanggal 31 Desember 2019. Saldo pada tanggal 31 Desember 2024, 2023, and 2022 adalah sebesar Rp350.570, Rp373.929, dan Rp396.120 dengan suku bunga paling rendah sebesar 4,45% dengan jangka waktu paling lama 15 (lima belas) tahun. Pengembalian dana pinjaman (angsuran pokok dan bunga) kepada SMF dilaksanakan paling lambat tanggal 10 setiap bulannya, apabila tanggal jatuh tempo pembayaran pokok dan bunga jatuh pada hari libur nasional, maka pembayaran dilakukan pada hari kerja sesudah tanggal jatuh tempo pembayaran.

Pinjaman yang diterima dari pihak-pihak berelasi pada tanggal 31 Desember 2024, 2023 dan 2022 masing-masing sebesar Rp Rp23.352.225, Rp22.453.290 dan Rp17.455.685 (Catatan 44).

Pada tanggal 31 Desember 2024, 2023 dan 2022, Bank telah memenuhi ketentuan dan kondisi yang ada dalam seluruh perjanjian pinjaman yang diterima.

25. FUND BORROWINGS (continued)

e. Loan from PT Sarana Multigriya Finansial (Persero) (SMF) (continued)

The Bank has several loan agreements with SMF as follow (continued):

- *SMF Loan FLPP Percepatan 2019 (continued)*

  This disbursement of facility is carried out during the availability period until December 31, 2019. The Outstanding Balance as of December 31, 2024, 2023, and 2022 is amounting to Rp350,570, Rp373,929, and Rp396,120 respectively with the lowest interest rate of 4.45% for a maximum period of 15 (fifteen) years. Loan repayments (principal and interest installments) to SMF is no later than the 10th of each month, if the due date of principal and interest payments falls on a national holiday, the payment is made on the working day after the payment due date.

As of December 31, 2024, 2023 and 2022, fund borrowings received from related parties amounted to Rp23,352,225, Rp22,453,290 and Rp17,455,685, respectively (Note 44).

As of December 31, 2024, 2023 and 2022, the Bank has complied with all of the existing terms and condition of the fund borrowing agreements.

26. PINJAMAN DAN EFEK-EFEK SUBORDINASI / *26. SUBORDINATED LOAN AND SECURITIES*

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Mata Uang Asing				*Foreign Currency*
Pihak Ketiga				*Third Parties*
Obligasi Subordinasi	4.828.105	4.612.840	4.658.242	*Subordinated bonds*
Rupiah				*Rupiah*
Pihak Berelasi (Catatan 44)				*Related Party (Note 44)*
Pinjaman Subordinasi dari PT Sarana Multigriya Finansial (Persero)	1.500.000	4.499.997	4.499.977	*Subordinated Loan from PT Sarana Multigriya Finansial (Persero)*
Total	**6.328.105**	**9.112.837**	**9.158.219**	***Total***

26. PINJAMAN DAN EFEK-EFEK SUBORDINASI (lanjutan)

a. Pinjaman Subordinasi PT Sarana Multigriya Finansial (Persero) (SMF)

Akun ini merupakan fasilitas pemberian Pinjaman Subordinasi yang diperoleh dari PT SMF (Persero) yang ditujukan untuk mendukung Program Sejuta Rumah. Pinjaman Subordinasi sebesar Rp3.000.000 dengan suku bunga 8,90% dilakukan pencairan pada tanggal 27 Desember 2019 yang akan jatuh tempo pada tanggal 27 Desember 2024. Pada tanggal 15 November 2021, Bank melakukan pencairan Pinjaman Subordinasi pada tanggal 15 November 2021 sebesar Rp1.500.000 dengan suku bunga 7,65% yang akan jatuh tempo pada tanggal 15 November 2026.

Pinjaman subordinasi ini telah mendapat persetujuan dari Otoritas Jasa Keuangan (OJK) melalui surat No. S-69/PB.31/2016 tanggal 30 September 2016 dan No. S-21/PB.31/2020 tanggal 4 Februari 2020 dan No. S-261/PB.31/2021 tanggal 25 November 2021.

Bank telah melakukan pelunasan atas pinjaman Subordinasi sebesar Rp3.000.000 saat jatuh tempo pada tanggal 27 Desember 2024 sebesar Rp3Triliun (angka penuh).

b. Obligasi Subordinasi

Pada tanggal 23 Januari 2020, Bank telah menerbitkan obligasi subordinasi sebesar ASD300 juta atau ekuivalen Rp4.089.000 dengan tenor 5 tahun dan bunga 4,20% per tahun dan dicatatkan di Bursa Efek Singapura. Penerbitan Obligasi tersebut telah dinyatakan efektif berdasarkan surat Otoritas Jasa Keuangan No. S-35/PB.31/ 2020 tanggal 26 Februari 2020.

Biaya penerbitan obligasi subordinasi tersebut sebesar Rp23.866 dicatat mengurangi nilai obligasi subordinasi dan akan diamortisasi sampai dengan tanggal jatuh tempo pada 23 Januari 2025.

Pada tanggal 31 Desember 2024, 2023 dan 2022, Bank telah memenuhi ketentuan dan kondisi yang ada dalam seluruh perjanjian pinjaman subordinasi yang diterima.

Bank melakukan lindung nilai arus kas atas pokok dan bunga dari sebagian porsi obligasi subordinasi (Catatan 12).

26. SUBORDINATED LOAN AND SECURITIES (continued)

a. PT Sarana Multigriya Finansial (Persero) (SMF) Subordinated Loan

This account is a subordinated loan that was obtained from PT SMF (Persero) that is aimed to support the one million housing program. Subordinated loan in the amount of Rp3,000,000 with interest rate of 8.90% was withdrawn on December 27, 2019 and will mature on December 27, 2024. On 15 November 2021, Bank disburse Subordinated Loan amounting Rp1,500,000 with interest rate 7.65% mature on November 15, 2026.

Subordinated loan has been approved by Financial Service Authority through letter No. S-69/PB.31/2016 dated September 30, 2016 and No. S-21/PB.31/2020 dated February 4, 2020 and No. S-261/PB.31/2021 dated November 25, 2021.

The Bank has fully repaid the loan in the amount of Rp3,000,000 at maturity date on December 27, 2024 amounting to Rp3 Trillion (full amount).

b. Subordinated Bonds

On January 23, 2020, the Bank issued subordinated bonds with a total nominal value of USD300 million or the equivalent to Rp4,089,000, with tenor of 5 years and interest of 4.20% per annum and listed in the Singapore Stock Exchange.The issuance of Global Bond became effective based on letter No. S-35/PB.31/2020 dated February 26, 2020.

The issuance costs of the subordinated bonds amounting to Rp23,866 was recorded as deduction to the amount of the subordinated bonds and amortised until the maturity date on January 23, 2025.

As of December 31, 2024, 2023 and 2022, the Bank has complied with all of the existing terms and conditions of the subordinated loan agreements.

Bank entered into partial cashflow hedge for principal and interest of subordinated bond (Note 12).

27. BUNGA YANG MASIH HARUS DIBAYAR / *27. INTEREST PAYABLE*

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Deposito berjangka	357.271	324.118	334.877	*Time deposits*
Pinjaman subordinasi dan efek-efek subordinasi	110.313	113.839	114.971	*Subordinated loan and securities*
Pinjaman yang diterima	78.560	81.069	51.072	*Fund borrowings*
Surat-surat berharga yang diterbitkan	54.916	71.460	79.538	*Securities issued*
Derivatif	57.010	57.010	48.908	*Derivative*
Total	**658.070**	**647.496**	**629.366**	***Total***

28. ESTIMASI KERUGIAN KOMITMEN DAN KONTINJENSI / *28. ESTIMATED LOSSES ON COMMITMENTS AND CONTINGENCIES*

Rincian garansi yang diterbitkan dan fasilitas kredit yang belum ditarik yang mempunyai risiko kredit adalah sebagai berikut:

The classification of guarantees issued and unused loan facility bearing credit risks are as follows:

	31 Desember/ *December 31,* 2024		31 Desember/ *December 31,* 2023		31 Desember/ *December 31,* 2022		
	Jumlah nosional mata uang asing *Notional amount in foreign currencies (angka penuh/ full amount)*	Ekuivalen/ *Equivalent Rupiah*	Jumlah nosional mata uang asing/ *Notional amount in foreign currencies (angka penuh/ full amount)*	Ekuivalen/ *Equivalent Rupiah*	Jumlah nosional mata uang asing/ *Notional amount in foreign currencies (angka penuh/ full amount)*	Ekuivalen/ *Equivalent Rupiah*	
Rupiah							*Rupiah*
Garansi yang diterbitkan (Catatan 40)		2.579.383		2.112.148		887.321	*Guarantees issued (Note 40)*
Fasilitas kredit yang belum ditarik (*committed*)		86.184		127.083		92.328	*Unused loan facility (committed)*
Irrevocable L/C yang masih berjalan (Catatan 40)		249.694		20.106		221.484	*Outstanding irrevocable L/Cs (Note 40)*
		2.915.261		**2.259.337**		**1.201.133**	
Mata uang asing							*Foreign currencies*
Garansi yang diterbitkan (Catatan 40)							*Guarantees issued (Note 40)*
Dolar Amerika Serikat	18.315.405	294.786	30.269.447	466.059	3.869.076	60.232	*United States Dollar*
Euro Eropa	14.908.241	249.834	56.784	968	56.784	942	*European Euro*
		544.620		467.027		61.174	
		3.459.881		**2.726.364**		**1.237.907**	

Pada tanggal 31 Desember 2024, 2023 dan 2022 tidak terdapat transaksi dengan pihak-pihak berelasi untuk fasilitas kredit yang belum ditarik.

As of December 31, 2024, 2023 and 2022, there are no transaction with related parties for unused loan facility.

Pada tanggal 31 Desember 2024, 2023 dan 2022, garansi bank yang diterbitkan kepada pihak-pihak berelasi, masing-masing sebesar Rp1.072.600, Rp1.116.581 dan Rp426.438 (Catatan 44).

As of December 31, 2024, 2023 and 2022, guarantees issued to related parties amounted to Rp1,072,600, Rp1,116,581 and Rp426,438, respectively (Note 44)

28. ESTIMASI KERUGIAN KOMITMEN DAN KONTINJENSI (lanjutan)

28. ESTIMATED LOSSES ON COMMITMENTS AND CONTINGENCIES (continued)

Perubahan nilai tercatat bruto adalah sebagai berikut:

Movements in the gross carrying amount are as follows:

	31 Desember/*December 31*, 2024					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
Fasilitas kredit yang belum ditarik (*committed*)						***Unused loan facility (committed)***
Saldo Awal	127.083	-	-	-	127.083	*Beginning balance*
Pengalihan ke:						*Transfer to:*
Stage 1	-	-	-	-	-	*Stage 1*
Stage 2	-	-	-	-	-	*Stage 2*
Stage 3	-	-	-	-	-	Stage 3
Total saldo awal setelah pengalihan	127.083	-	-	-	127.083	*Total opening balance after transfer*
Pengukuran kembali bersih nilai tercatat	(17.551)	-	-	-	(17.551)	*Net remeasurement of carrying amount*
Aset keuangan baru yang diterbitkan atau dibeli	32.964	-	-	-	32.964	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(56.312)	-	-	-	(56.312)	*Derecognized financial assets*
Total Penambahan/(penurunan) tahun berjalan	(40.899)	-	-	-	(40.899)	*Total additional/(reversal) during the year*
Saldo akhir periode	**86.184**	**-**	**-**	**-**	**86.184****	***Balance at the end of period***

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"
**) Terdiri dari fasilitas kredit yang *committed* yang belum ditarik

**) Not applying SFAS No. 109, "Financial Instruments"*
***) Consist of committed unused loan facility*

	31 Desember/*December 31*, 2023					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
Fasilitas kredit yang belum ditarik (*committed*)						***Unused loan facility (committed)***
Saldo Awal	80.128	-	-	-	80.128	*Beginning balance*
Pengalihan ke:						*Transfer to:*
Stage 1	-	-	-	-	-	*Stage 1*
Stage 2	-	-	-	-	-	*Stage 2*
Stage 3	-	-	-	-	-	*Stage 3*
Total saldo awal setelah pengalihan	80.128	-	-	-	80.128	*Total opening balance after transfer*
Pengukuran kembali bersih nilai tercatat	29.126	-	-	-	29.126	*Net remeasurement of carrying amount*
Aset keuangan baru yang diterbitkan atau dibeli	26.995	-	-	-	26.995	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(9.166)	-	-	-	(9.166)	*Derecognized financial assets*
Total Penambahan/(penurunan) tahun berjalan	46.955	-	-	-	46.955	*Total additional/(reversal) during the year*
Saldo akhir tahun	**127.083**	**-**	**-**	**-**	**127.083****	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"
**) Terdiri dari fasilitas kredit yang *committed* yang belum ditarik

**) Not applying SFAS No. 109, "Financial Instruments"*
***) Consist of committed unused loan facility*

28. ESTIMASI KERUGIAN KOMITMEN DAN KONTINJENSI (lanjutan)

28. ESTIMATED LOSSES ON COMMITMENTS AND CONTINGENCIES (continued)

Perubahan nilai tercatat bruto adalah sebagai berikut: (lanjutan)

Movements in the gross carrying amount are as follows: (continued)

	31 Desember/*December 31*, 2022					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
Fasilitas kredit yang belum ditarik (*committed*)						***Unused loan facility (committed)***
Saldo Awal	89.811	8.123	-	-	97.934	*Beginning balance*
Pengalihan ke:						*Transfer to:*
Stage 1	8.123	(8.123)	-	-	-	*Stage 1*
Stage 3	-	-	-	-	-	*Stage 3*
Total saldo awal setelah pengalihan	97.934	-	-	-	97.934	*Total opening balance after transfer*
Pengukuran kembali bersih nilai tercatat	226	-	-	-	226	*Net remeasurement of carrying amount*
Aset keuangan baru yang diterbitkan atau dibeli	-	-	-	-	-	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(18.032)	-	-	-	(18.032)	*Derecognized financial assets*
Total Penambahan/(penurunan) tahun berjalan	(17.806)	-	-	-	(17.806)	*Total additional/(reversal) during the year*
Saldo akhir tahun	**80.128**	**-**	**-**	**-**	**80.128****	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"
**) Terdiri dari fasilitas kredit yang *committed* yang belum ditarik

) Not applying SFAS No. 109, "Financial Instruments"
) Consist of committed unused loan facility

	31 Desember/*December 31*, 2024					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
***Irrevocable* L/C yang masih berjalan**						***Outstanding irrevocable L/Cs***
Saldo Awal	20.107	-	-	-	20.107	*Beginning balance*
Pengukuran kembali bersih nilai tercatat	(124.543)	-	-	-	(124.543)	*Net remeasurement of carrying amount*
Aset keuangan baru yang diterbitkan atau dibeli	771.596	-	-	-	771.596	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(417.466)	-	-	-	(417.466)	*Derecognized financial assets*
Total penambahan/(penurunan) tahun berjalan	229.587	-	-	-	229.587	*Total additional/(reversal) during the period*
Saldo akhir periode	**249.694**	**-**	**-**	**-**	**249.694**	***Balance at the end of period***

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"

) Not applying SFAS No. 109, "Financial Instruments"

	31 Desember/*December 31*, 2023					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
***Irrevocable* L/C yang masih berjalan**						***Outstanding irrevocable L/Cs***
Saldo Awal	221.484	-	-	-	221.484	*Beginning balance*
Pengukuran kembali bersih nilai tercatat	(175.450)	-	-	-	(175.450)	*Net remeasurement of carrying amount*
Aset keuangan baru yang diterbitkan atau dibeli	460.627	-	-	-	460.627	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(486.555)	-	-	-	(486.555)	*Derecognized financial assets*
Total penambahan/(penurunan) tahun berjalan	(201.378)	-	-	-	(201.378)	*Total additional/(reversal) during the period*
Saldo akhir tahun	**20.107**	**-**	**-**	**-**	**20.107**	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"

) Not applying SFAS No. 109, "Financial Instruments"

28. ESTIMASI KERUGIAN KOMITMEN DAN KONTINJENSI (lanjutan)

28. ESTIMATED LOSSES ON COMMITMENTS AND CONTINGENCIES (continued)

Perubahan nilai tercatat bruto adalah sebagai berikut: (lanjutan)

Movements in the gross carrying amount are as follows: (continued)

	31 Desember/*December 31*, 2022					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
***Irrevocable* L/C yang masih berjalan**						***Outstanding irrevocable L/Cs***
Saldo Awal	280.604	-	-	-	280.604	*Beginning balance*
Pengukuran kembali bersih nilai tercatat	(75.440)	-	-	-	(75.440)	*Net remeasurement of carrying amount*
Aset keuangan baru yang diterbitkan atau dibeli	683.151	-	-	-	638.151	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(666.830)	-	-	-	(666.830)	*Derecognized financial assets*
Total penambahan/(penurunan) tahun berjalan	(59.119)	-	-	-	(59.119)	*Total additional/(reversal) during the year*
Saldo akhir tahun	**221.484**	**-**	**-**	**-**	**221.484**	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"

**) Not applying SFAS No. 109, "Financial Instruments"*

Perubahan estimasi kerugian komitmen dan kontinjensi adalah sebagai berikut:

The movements in the estimated for impairment losses on commitments and contingencies are as follows:

	31 Desember/ *December 31*, 2024	**31 Desember/ *December 31*, 2023**	**31 Desember/ *December 31*, 2022**	
Rupiah				*Rupiah*
Saldo awal tahun	3.580	4.719	3.644	*Balance at beginning of year*
Penyisihan/(pemulihan) kerugian penurunan nilai selama tahun berjalan	(195)	(1.139)	1.075	*Provision/(reversal) for impairment losses during the year*
Saldo akhir	**3.385**	**3.580**	**4.719**	***Balance at the end***

	31 Desember/*December 31*, 2024					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
Fasilitas kredit yang belum ditarik (*committed*)						***Unused loan facility (committed)***
Saldo awal	3.564	-	-	-	3.564	*Beginning balance*
Pengalihan ke:						*Transfer to:*
Stage 1	-	-	-	-	-	*Stage 1*
Stage 2	-	-	-	-	-	*Stage 2*
Stage 3	-	-	-	-	-	*Stage 3*
Total saldo awal setelah pengalihan	3.564	-	-	-	3.564	*Total opening balance after transfer*
Pengukuran kembali bersih penurunan nilai	(1.686)	-	-	-	(1.686)	*Net remeasurement of impairment losses*
Aset keuangan baru yang diterbitkan atau dibeli	2.711	-	-	-	2.711	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(1.243)	-	-	-	(1.243)	*Derecognized financial asset*
Total Penambahan/(penurunan) tahun berjalan	(218)	-	-	-	(218)	*Total Additional(reversal)/ during the year*
Saldo akhir periode	**3.346**	**-**	**-**	**-**	**3.346**	***Balance at the end of period***

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"

**) Not applying SFAS No. 109, "Financial Instruments"*

28. ESTIMASI KERUGIAN KOMITMEN DAN KONTINJENSI (lanjutan)

Perubahan cadangan kerugian komitmen dan kontinjensi adalah sebagai berikut (lanjutan):

28. ESTIMATED LOSSES ON COMMITMENTS AND CONTINGENCIES (continued)

The movements in the allowance for impairment losses on commitments and contingencies are as follows (continued):

	31 Desember/*December 31*, 2023					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
Fasilitas kredit yang belum ditarik (*committed*)						***Unused loan facility (committed)***
Saldo awal	4.607	-	-	-	4.607	*Beginning balance*
Pengalihan ke:						*Transfer to:*
Stage 1	-	-	-	-	-	*Stage 1*
Stage 2	-	-	-	-	-	*Stage 2*
Stage 3	-	-	-	-	-	*Stage 3*
Total saldo awal setelah pengalihan	4.607	-	-	-	4.607	*Total opening balance after transfer*
Pengukuran kembali bersih penurunan nilai	(992)	-	-	-	(992)	*Net remeasurement of impairment losses*
Aset keuangan baru yang diterbitkan atau dibeli	938	-	-	-	938	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(989)	-	-	-	(989)	*Derecognized financial asset*
Total Penambahan/(penurunan) tahun berjalan	(1.043)	-	-	-	(1.043)	*Total Additional(reversal)/ during the year*
Saldo akhir tahun	**3.564**	**-**	**-**	**-**	**3.564**	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"

**) Not applying SFAS No. 109, "Financial Instruments"*

	31 Desember/*December 31*, 2022					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
Fasilitas kredit yang belum ditarik (*committed*)						***Unused loan facility (committed)***
Saldo awal	1.640	1.640	-	-	3.280	*Beginning balance*
Pengalihan ke:						*Transfer to:*
Stage 1	1.640	(1.640)	-	-	-	*Stage 1*
Stage 3	-	-	-	-	-	*Stage 3*
Total saldo awal setelah pengalihan	3.280	-	-	-	3.280	*Total opening balance after transfer*
Pengukuran kembali bersih penurunan nilai	1.792	-	-	-	1.792	*Net remeasurement of impairment losses*
Aset keuangan baru yang diterbitkan atau dibeli	-	-	-	-	-	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(465)	-	-	-	(465)	*Derecognized financial asset*
Total Penambahan/(penurunan) tahun berjalan	1.327	-	-	-	1.327	*Total Additional(reversal)/ during the year*
Saldo akhir tahun	**4.607**	**-**	**-**	**-**	**4.607**	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"

**) Not applying SFAS No. 109, "Financial Instruments"*

28. ESTIMASI KERUGIAN KOMITMEN DAN KONTINJENSI (lanjutan)

Perubahan cadangan kerugian komitmen dan kontinjensi adalah sebagai berikut (lanjutan):

28. ESTIMATED LOSSES ON COMMITMENTS AND CONTINGENCIES (continued)

The movements in the allowance for impairment losses on commitments and contingencies are as follows (continued):

	31 Desember/*December 31*, 2024					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
***Irrevocable* L/C yang masih berjalan**						***Outstanding irrevocable L/Cs***
Saldo Awal	16	-	-	-	16	*Beginning balance*
Pengukuran kembali bersih nilai tercatat	(3)	-	-	-	(3)	*Net remeasurement of carrying amount*
Aset keuangan baru yang diterbitkan atau dibeli	51	-	-	-	51	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(25)	-	-	-	(25)	*Derecognized financial assets*
Total Penambahan/(penurunan) period berjalan	23	-	-	-	23	*Total additional/(reversal) period the year*
Saldo akhir periode	**39**	**-**	**-**	**-**	**39**	***Balance at the end of period***

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"

**) Not applying SFAS No. 109, "Financial Instruments"*

	31 Desember/*December 31*, 2023					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
***Irrevocable* L/C yang masih berjalan**						***Outstanding irrevocable L/Cs***
Saldo Awal	112	-	-	-	112	*Beginning balance*
Pengukuran kembali bersih nilai tercatat	(7.355)	-	-	-	(7.355)	*Net remeasurement of carrying amount*
Aset keuangan baru yang diterbitkan atau dibeli	7.567	-	-	-	7.567	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(308)	-	-	-	(308)	*Derecognized financial assets*
Total Penambahan/(penurunan) period berjalan	(96)	-	-	-	(96)	*Total additional/(reversal) period the year*
Saldo akhir tahun	**16**	**-**	**-**	**-**	**16**	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109, "Instrumen Keuangan"

**) Not applying SFAS No. 109, "Financial Instruments"*

	31 Desember/*December 31*, 2022					
	Stage 1	**Stage 2**	**Stage 3**	**Syariah*)**	**Total**	
***Irrevocable* L/C yang masih berjalan**						***Outstanding irrevocable L/Cs***
Saldo Awal	364	-	-	-	364	*Beginning balance*
Pengukuran kembali bersih nilai tercatat	(83)	-	-	-	(83)	*Net remeasurement of carrying amount*
Aset keuangan baru yang diterbitkan atau dibeli	1.395	-	-	-	1.395	*New financial assets originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(1.564)	-	-	-	(1.564)	*Derecognized financial assets*
Total Penambahan/(penurunan) period berjalan	(252)	-	-	-	(252)	*Total additional/(reversal) period the year*
Saldo akhir tahun	**112**	**-**	**-**	**-**	**112**	***Balance at the end of year***

*) Tidak menerapkan PSAK No. 109 "Instrumen Keuangan"

**) Not applying SFAS No. 109 "Financial Instruments"*

Manajemen berpendapat bahwa penyisihan estimasi kerugian komitmen dan kontinjensi yang dibentuk telah memadai.

Based on management's assessment, the amount of estimated losses on commitments and contingencies is adequate.

29. LIABILITAS IMBALAN KERJA DAN LAIN-LAIN / *29. EMPLOYEE BENEFITS AND OTHER LIABILITIES*

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Liabilitas imbalan kerja				*Employee benefits liabilities*
Bonus dan tantiem	396.171	730.178	855.623	*Bonuses and tantiem*
Imbalan kerja jangka panjang (Catatan 41b)	1.349.111	1.279.342	1.073.511	*Long term employee benefits (Note 41b)*
	1.745.282	**2.009.520**	**1.929.134**	
Liabilitas lain-lain				*Other liabilities*
Dana jaminan pengembang (kewajiban pada pihak ketiga)	304.326	511.858	4.680.949	*Developers' security deposits (liabilities to third party)*
Liabilitas sewa	165.706	186.696	167.633	*Lease liability*
Lainnya	156.854	243.774	471.269	*Others*
	626.886	**942.328**	**5.319.851**	
Total	**2.372.168**	**2.951.848**	**7.248.985**	***Total***

Cadangan atas bonus merupakan kewajiban atas jasa produksi karyawan pada tahun berjalan yang belum dibagikan pada akhir tahun.

Provision for bonus represents unpaid employees' bonus for the current year which has not yet been distributed at the end of the year.

Dana jaminan pengembang merupakan setoran jaminan dari pengembang untuk menjamin penyelesaian kewajiban pengembang di Bank.

Developer's security deposits represent security deposit from developer to ensure that the developer settle its obligation to the Bank.

Bank telah mengidentifikasi dugaan pemalsuan bilyet deposito Bank dan dari hasil pemeriksaan Bank menunjukkan bahwa terdapat beberapa bilyet deposito Bank yang diduga dipalsukan oleh pihak lain di luar Bank sehingga tidak tercatat dalam sistem Bank. Bank telah melaporkan kasus tersebut kepada pihak berwajib dan saat ini sedang dalam proses penyidikan sehingga jumlah pasti atas potensi kerugian dari kasus tersebut belum dapat ditentukan. Sebagai bentuk penerapan prinsip kehati-hatian, Bank telah membentuk cadangan atas potensi kerugian operasional masing-masing per tanggal 31 Desember 2024, 2023 dan 2022 sebesar Rp16.382, Rp32.971 dan Rp16.590.

The Bank has identified an indication of forged transaction in the Bank's certificate of time deposits and based on the Bank's investigation, there were several Bank's certificate of time deposits forged by third party, therefore it is not recorded in the Bank's system. The Bank has reported this case to the authority and currently it is in the process of investigation, therefore the definite amount of pontential loss from this case is still cannot be determined yet. In view of implementation of prudential banking principle, the Bank has provided allowance for potential operational losses as of December 31, 2024, 2023 and 2022 amounting to Rp16,382, Rp32,971 and Rp16,590, respectively.

29. LIABILITAS IMBALAN KERJA DAN LAIN-LAIN (lanjutan)

29. EMPLOYEE BENEFITS AND OTHER LIABILITIES (continued)

Pengungkapan liabilitas sewa pada tanggal 31 Desember 2024, 2023 dan 2022 adalah sebagai berikut:

Disclosure of lease liabilities on December 31, 2024, 2023 and 2022 is as follows:

	31 Desember/*December 31*, 2024					
	1 Januari/ *January 1*, 2024	**Penambahan liabilitas sewa/ *Additions of lease liabilities***	**Beban bunga atas liabilitas sewa/ *Interest expense of lease liabilities***	**Pembayaran *liabilitas sewa/ Payment of lease liabilities***	***31* Desember/ *December 31*, 2024**	
Bangunan	30.488	7.036	279	(9.284)	28.240	*Building*
Kendaraan	156.037	65.382	8.331	(83.953)	137.466	*Motor vehicles*
Mesin ATM	48	-	-	(48)	-	*ATM machine*
Lainnya	123	-	-	(123)	-	*Others*
Total	**186.696**	**72.418**	**8.610**	**(93.408)**	**165.706**	***Total***

	31 Desember/*December 31*, 2023					
	1 Januari/ *January 1*, 2023	**Penambahan liabilitas sewa/ *Additions of lease liabilities***	**Beban bunga atas liabilitas sewa/ *Interest expense of lease liabilities***	**Pembayaran *liabilitas sewa/ Payment of lease liabilities***	***31* Desember/ *December 31*, 2023**	
Bangunan	47.274	1.260	1.264	(18.046)	30.488	*Building*
Kendaraan	118.726	99.737	8.933	(62.426)	156.037	*Motor vehicles*
Mesin ATM	1.510	39	39	(1.501)	48	*ATM machine*
Lainnya	123	-	-	-	123	*Others*
Total	**167.633**	**101.036**	**10.236**	**(81.973)**	**186.696**	***Total***

	31 Desember/*December 31*, 2022					
	1 Januari/ *January 1*, 2022	**Penambahan liabilitas sewa/ *Additions of lease liabilities***	**Beban bunga atas liabilitas sewa/ *Interest expense of lease liabilities***	**Pembayaran *liabilitas sewa/ Payment of lease liabilities***	***31* Desember/ *December 31*, 2022**	
Bangunan	95.663	3.571	3.571	(51.960)	47.274	*Building*
Kendaraan	25.920	122.449	6.293	(29.643)	118.726	*Motor vehicles*
Mesin ATM	4.605	247	246	(3.342)	1.510	*ATM machine*
Lainnya	160	1	1	(38)	123	*Others*
Total	**126.348**	**126.268**	**10.111**	**(84.983)**	**167.633**	***Total***

30. EKUITAS / *30. EQUITY*

a. Modal Saham / *Capital Stock*

Rincian modal dasar, modal ditempatkan dan disetor penuh Bank adalah sebagai berikut:

The details of the Bank's authorized capital stock and issued and fully paid capital stock are as follows:

	31 Desember/*December 31,* 2024				
	Jumlah lembar saham/ *Number of shares*	**Nilai nominal per lembar saham (Rupiah penuh)/ *Par value per share (Full Rupiah)***	**Jumlah nilai saham/ *Total value of shares***	**Persentase kepemilikan/ *Percentage ownership***	
Modal Dasar					***Authorized Capital***
Saham Seri A Dwiwarna	1	500	-	0,00%	*Series A Dwiwarna Stock*
Saham Biasa atas nama Seri B	20.478.431.999	500	10.239.216	100,00%	*Series B Common Stock*
	20.478.432.000		**10.239.216**	**100,00%**	
Modal Ditempatkan dan Disetor Penuh					***Issued and Fully Paid Capital***
Saham Seri A Dwiwarna					*Series A Dwiwarna Stock*
Pemerintah	1	500	-	0,00%	*Government*
Saham Seri B					*Series B Stock*
Pemerintah	8.420.666.647	500	4.210.333	60,00%	*Government*
Dewan Komisaris					*Board of Commissioners*
Herry Trisaputra Zuna	879.300	500	440	0,01%	*Herry Trisaputra Zuna*
Himawan Arief Sugoto	879.300	500	440	0,01%	*Himawan Arief Sugoto*
Direksi					*Directors*
Nixon L.P Napitupulu	5.399.000	500	2.699	0,04%	*Nixon L.P Napitupulu*
Oni Febriarto Rahardjo	1.149.100	500	574	0,01%	*Oni Febriarto Rahardjo*
Nofry Rony Poetra	3.527.422	500	1.764	0,03%	*Nofry Rony Poetra*
Elisabeth Novie Riswanti	2.729.600	500	1.365	0,02%	*Elisabeth Novie Riswanti*
Eko Waluyo	2.868.364	500	1.434	0,02%	*Eko Waluyo*
Setiyo Wibowo	2.889.100	500	1.445	0,02%	*Setiyo Wibowo*
Jasmin	3.844.430	500	1.922	0,03%	*Jasmin*
Andi Nirwoto	2.818.561	500	1.409	0,02%	*Andi Nirwoto*
Hirwandi Gafar	2.759.714	500	1.380	0,02%	*Hirwandi Gafar*
Hakim Putratama	794.400	500	397	0,01%	*Hakim Putratama*
Masyarakat (kepemilikan masing -masing dibawah 5% untuk setiap pihak)	5.583.239.474	500	2.791.620	39,78%	*Public (ownership less than 5% each)*
Total	**14.034.444.413**		**7.017.222**	**100,00%**	***Total***

30. EKUITAS (lanjutan)

a. Modal Saham (lanjutan)

Rincian modal dasar, modal ditempatkan dan disetor penuh Bank adalah sebagai berikut (lanjutan):

30. EQUITY (continued)

a. Capital Stock (continued)

The details of the Bank's authorized capital stock and issued and fully paid capital stock are as follows (continued):

	31 Desember/*December 31,* 2023				
	Jumlah lembar saham/ ***Number of shares***	**Nilai nominal per lembar saham (Rupiah penuh)/** ***Par value per share (Full Rupiah)***	**Jumlah nilai saham/** ***Total value of shares***	**Persentase kepemilikan/** ***Percentage ownership***	
Modal Dasar					***Authorized Capital***
Saham Seri A Dwiwarna	1	500	-	0.00%	*Series A Dwiwarna Stock*
Saham Biasa atas nama Seri B	20.478.431.999	500	10.239.216	100.00%	*Series B Common Stock*
	20.478.432.000		**10.239.216**	**100,00%**	
Modal Ditempatkan dan Disetor Penuh					***Issued and Fully Paid Capital***
Saham Seri A Dwiwarna					*Series A Dwiwarna Stock*
Pemerintah	1	500	-	0.00%	*Government*
Saham Seri B					*Series B Stock*
Pemerintah	8.420.666.647	500	4.210.333	60,00%	*Government*
Dewan Komisaris					*Board of Commissioners*
Herry Trisaputra Zuna	404.600	500	202	0,00%	*Herry Trisaputra Zuna*
Himawan Arief Sugoto	404.600	500	202	0,00%	*Himawan Arief Sugoto*
Direksi					*Directors*
Nixon L.P Napitupulu	4.250.500	500	2.125	0,03%	*Nixon L.P Napitupulu*
Oni Febriarto Rahardjo	308.000	500	154	0,01%	*Oni Febriarto Rahardjo*
Nofry Rony Poetra	2.531.022	500	1.266	0,02%	*Nofry Rony Poetra*
Elisabeth Novie Riswanti	1.733.200	500	867	0,01%	*Elisabeth Novie Riswanti*
Eko Waluyo	1.871.964	500	936	0,01%	*Eko Waluyo*
Setiyo Wibowo	1.892.700	500	946	0,01%	*Setiyo Wibowo*
Jasmin	2.848.030	500	1.424	0,02%	*Jasmin*
Andi Nirwoto	1.822.161	500	911	0,01%	*Andi Nirwoto*
Hirwandi Gafar	1.763.314	500	882	0,01%	*Hirwandi Gafar*
Masyarakat (kepemilikan masing -masing dibawah 5% untuk setiap pihak)	5.593.947.673	500	2.796.974	39,86%	*Public (ownership less than 5% each)*
Total	**14.034.444.413**		**7.017.222**	**100,00%**	***Total***

30. EKUITAS (lanjutan) / *30. EQUITY (continued)*

a. Modal Saham (lanjutan) / *a. Capital Stock (continued)*

Rincian modal dasar, modal ditempatkan dan disetor penuh Bank adalah sebagai berikut (lanjutan):

The details of the Bank's authorized capital stock and issued and fully paid capital stock are as follows (continued):

	31 Desember/*December 31,* 2022				
	Jumlah lembar saham/ ***Number of shares***	**Nilai nominal per lembar saham (Rupiah penuh)/** ***Par value per share (Full Rupiah)***	**Jumlah nilai saham/** ***Total value of shares***	**Persentase kepemilikan/** ***Percentage ownership***	
Modal Dasar					***Authorized Capital***
Saham Seri A Dwiwarna	1	500	-	0.00%	*Series A Dwiwarna Stock*
Saham Biasa atas nama Seri B	20.478.431.999	500	10.239.216	100.00%	*Series B Common Stock*
	20.478.432.000		**10.239.216**	**100,00%**	
Modal Ditempatkan dan Disetor Penuh					***Issued and Fully Paid Capital***
Saham Seri A Dwiwarna					*Series A Dwiwarna Stock*
Pemerintah	1	500	-	0.00%	*Government*
Saham Seri B					*Series B Stock*
Pemerintah	6.353.999.999	500	3.177.000	60,00%	*Government*
Direksi					*Directors*
Haru Koesmahargyo	304.600	500	152	0,00%	*Haru Koesmahargyo*
Nixon L.P Napitupulu	2.481.800	500	1.241	0,02%	*Nixon L.P Napitupulu*
Hirwandi Gafar	603.900	500	302	0,01%	*Hirwandi Gafar*
Elisabeth Novie Riswanti	581.200	500	291	0,01%	*Elisabeth Novie Riswanti*
Andi Nirwoto	648.300	500	324	0,01%	*Andi Nirwoto*
Eko Waluyo	686.300	500	343	0,01%	*Eko Waluyo*
Nofry Rony Poetra	1.034.600	500	517	0,01%	*Nofry Rony Poetra*
Jasmin	1.422.400	500	711	0,01%	*Jasmin*
Setiyo Wibowo	547.900	500	274	0,00%	*Setiyo Wibowo*
Masyarakat (kepemilikan masing -masing dibawah 5% untuk setiap pihak)	4.227.689.000	500	2.113.845	39,92%	*Public (ownership less than 5% each)*
Total	**10.590.000.000**		**5.295.000**	**100,00%**	***Total***

Saham Seri A Dwiwarna adalah saham yang memberikan hak-hak preferen kepada pemegangnya untuk menyetujui pengangkatan dan pemberhentian Dewan Komisaris dan Direksi, perubahan anggaran dasar, menyetujui penggabungan, peleburan, pengambilalihan dan pemisahan Bank, pengajuan permohonan agar Bank dinyatakan pailit dan pembubaran Bank.

Series A Dwiwarna share is the share that gives the shareholder preferential rights to approve the appointment or dismissal of Commissioners and Directors, changes in Articles of Association, approve on Bank's merger, dissolution, acquisition and separation, submission of request for bankruptcy and liquidation of the Bank.

Saham Seri B adalah saham biasa atas nama yang dapat dimiliki oleh masyarakat.

Series B shares are common shares that can be owned by the public.

30. EKUITAS (lanjutan)

a. Modal Saham (lanjutan)

Kepemilikan saham oleh Dewan Komisaris dan Direksi adalah dalam rangka Peraturan Otoritas Jasa Keuangan (POJK) No. 45/POJK.03/2015 tanggal 23 Desember 2015 tentang Penerapan Tata Kelola dalam Pemberian Remunerasi Bagi Bank Umum, dimana anggota Direksi dan Dewan Komisaris Non-Independen diberikan remunerasi yang bersifat variabel dalam bentuk saham Perseroan.

Saham yang dimiliki oleh Dewan Komisaris dan Direksi untuk tahun yang berakhir pada tanggal 31 Desember 2024, 2023 dan 2022 masing-masing sebesar 30.538.291, 19.830.091 lembar saham dan 8.311.000 lembar saham atau 0,22%, 0,11% dan 0,08% dari jumlah modal dasar.

b. Tambahan modal disetor

Perubahan tambahan modal disetor adalah sebagai berikut:

Saldo pada tanggal 1 Januari 2009	-	*Balance as January 1, 2009*
Tambahan Modal disetor akibat penawaran umum perdana tahun 2009	708.017	*Additional Paid in capital due to Initial Public Offering in 2009*
Biaya emisi penerbitan saham	(68.391)	*Shares Issuance Cost*
	639.626	
Tambahan Modal disetor akibat adanya pelaksanaan opsi pembelian (eksekusi) saham MESOP I tahap 1 dan 2 Tahun 2011	94.733	*Additional Paid in capital due to purchased stock option during phases 1 and 2 of MESOP I in 2011*
	734.359	
Tambahan Modal disetor akibat adanya pelakskanaan opsi pembelian (eksekusi) saham MESOP I tahap 3 dan 4 Tahun 2012	5.219	*Additional Paid in capital due to purchased stock option during phases 3 and 4 of MESOP I in 2012*
Tambahan Modal disetor akibat adanya pelaksanaan opsi pembelian (eksekusi) saham MESOP II tahap 1 dan 2 Tahun 2012	1.130	*Additional Paid in capital due to purchased stock option during phases 1 and 2 of MESOP II in 2012*
	740.708	
Tambahan Modal disetor akibat Penawaran Umum Saham Terbatas I pada tahun 2012	1.111.949	*Additional paid in capital due to Right Issue I in 2012*
Biaya emisi penerbitan saham	(59.154)	*Shares Issuance Cost*
	1.793.503	

30. EQUITY (continued)

a. Capital Stock (continued)

The shares ownership by board of commissioners and board of directors follows the Financial Services Authority Regulation (POJK) No. 45/POJK.03/2015 dated December 23, 2015 concerning Implementation of Governance in the Provision of Remuneration for Commercial Banks, where members of the Directors and Board of Commissioners are given variable remuneration in the form of the Company's shares.

Shares held by the Board of Commissioners and Board of Directors for the years ended December 31, 2024, 2023 and 2022 amounted to 30,538,291, 19,830,091 shares and 8,311,000 shares or 0.22%, 0.11% and 0.08% of the total authorized capital, respectively.

b. Additional Paid In Capital

The movements in additional paid in capital are as follows:

30. EKUITAS (lanjutan)

b. Tambahan modal disetor (lanjutan)

Perubahan tambahan modal disetor adalah sebagai berikut: (lanjutan)

Tambahan Modal disetor akibat adanya pelaksanaan opsi pembelian (eksekusi) saham MESOP I tahap 5 dan 6 Tahun 2013	11.063	Additional Paid in capital due to purchased stock option during phases 5 and 6 of MESOP I in 2013
Tambahan Modal disetor akibat adanya pelaksanaan opsi pembelian (eksekusi) saham MESOP II tahap 3 dan 4 Tahun 2013	117.623	Additional Paid in capital due to purchased stock option during phases 3 and 4 of MESOP II in 2013
Tambahan Modal disetor akibat adanya pelaksanaan opsi pembelian (eksekusi) saham MESOP III tahap 1 dan 2 Tahun 2013	103.575	Additional Paid in capital due to purchased stock option during phases 1 and 2 of MESOP III in 2013
	2.025.764	
Tambahan Modal disetor akibat adanya pelaksanaan opsi pembelian (eksekusi) saham MESOP I tahap 7 dan 8 Tahun 2014	1.840	Additional Paid in capital due to purchased stock option during phases 7 and 8 of MESOP I in 2014
Tambahan Modal disetor akibat adanya pelaksanaan opsi pembelian (eksekusi) saham MESOP II tahap 5 dan 6 Tahun 2014	243	Additional Paid in capital due to purchased stock option during phases 5 and 6 of MESOP II in 2014
Tambahan Modal disetor akibat adanya pelaksanaan opsi pembelian (eksekusi) saham MESOP III tahap 3 dan 4 Tahun 2014	289	Additional Paid in capital due to purchased stock option during phases 3 and 4 of MESOP III in 2014
	2.028.136	
Tambahan Modal disetor akibat adanya pelaksanaan opsi pembelian (eksekusi) saham MESOP II tahap 7 dan 8 serta MESOP III tahap 5 dan 6 Tahun 2015	18.462	Additional Paid in capital due to purchased stock option during phases 7 and 8 of MESOP II and phases 5 and 6 of MESOP III in 2015
	2.046.598	
Tambahan Modal disetor akibat adanya pelaksanaan opsi pembelian (eksekusi) saham MESOP III tahap 7 Tahun 2016	7.856	Additional Paid in capital due to purchased stock option during phase 7 of MESOP III in 2016
	2.054.454	
Tambahan Modal disetor akibat Penawaran Umum Saham Terbatas II pada tahun 2022/2023	2.411.111	Additional paid in capital due to Right Issue II in 2022/2023
Biaya Emisi Penerbitan Saham	(46.665)	Shares Issuance Cost
	4.418.900	

30. EQUITY (continued)

b. Additional paid-in capital (continued)

The movements in additional paid in capital are as follows: (continued)

30. EKUITAS (lanjutan)

c. Penggunaan Laba

Penggunaan Laba Tahun 2023

Alokasi penggunaan laba untuk tahun yang berakhir pada tanggal 31 Desember 2023 adalah sebagai berikut:
a. Dividen sebesar Rp700.198
b. Laba ditahan yang telah ditentukan penggunaannya Rp2.800.790

Penggunaan Laba Tahun 2022

Alokasi penggunaan laba untuk tahun yang berakhir pada tanggal 31 Desember 2022 adalah sebagai berikut:
c. Dividen sebesar Rp609.015
d. Laba ditahan yang telah ditentukan penggunaannya Rp2.436.057

Penggunaan Laba Tahun 2021

Alokasi penggunaan laba untuk tahun yang berakhir pada tanggal 31 Desember 2021 adalah sebagai berikut:
a. Dividen sebesar Rp237.624
b. Laba ditahan yang telah ditentukan penggunaannya Rp2.138.602

d. Dana Setoran Modal

Berdasarkan Rapat Umum Pemegang Saham Luar Biasa Tanggal 18 Oktober 2022, Para Pemegang Saham Bank Menyetujui Untuk Melakukan Penambahan Modal Melalui Penawaran Umum Terbatas II (PUT II) Dengan Memberikan Hak Memesan Efek Terlebih Dahulu (PMHMETD) kepada para pemegang saham Bank sejumlah 4.600.000.000 (empat miliar enam ratus juta) lembar saham dengan nominal sebesar Rp500 (nilai penuh) (lima ratus rupiah) per lembar saham dengan harga pelaksanaan Rp1.200 (nilai penuh) (seribu dua ratus rupiah) per lembar saham.

Bank melakukan pembukuan Penambahan Modal Dengan Hak Memesan Efek Terlebih Dahulu (PMHMETD) Bank BTN Tahun 2022 dengan setoran modal dari pemerintah sebesar Rp2.480.000 dan setoran modal dari publik sebesar Rp276.575.

Berdasarkan kajian legal yang telah dilakukan oleh Bank, dana penambahan modal melalui PMHMETD sudah dapat diakui sebagai modal disetor dikarenakan sudah terdapatnya akta perubahan anggaran dasar Bank pada tanggal 16 Maret 2023.

30. EQUITY (continued)

c. Profit Distribution

Profit Distribution for Year 2023

Allocation of profit distribution for the year ended December 31, 2023, are as follow:
a. Dividends amounted to Rp700,198
b. Appropriated retained earnings amounted to Rp2,800,790

Profit Distribution for Year 2022

Allocation of profit distribution for the year ended December 31, 2022, are as follow:
c. Dividends amounted to Rp609,015
d. Appropriated retained earnings amounted to Rp2,436,057

Profit Distribution for Year 2021

Allocation of profit distribution for the year ended December 31, 2021 are as follow:
a. Dividends amounted to Rp237,624
b. Appropriated retained earnings amounted to Rp2,138,602

d. Capital deposit fund

Based on extraordinary meeting of shareholder dated October 18, 2022, the shareholder of the Bank approved the additional capital through the Limited Public Offering II (PUT II) with pre-emptive rights to the Bank's shareholders at the most 4,600,000,000 (four billion six hundred million) common registered shares with a nominal value of Rp500 (full amount) per share with exercise price of Rp1,200 (full amount) per share.

The bank has recorded additional capital with pre-emptive rights (PMHMETD) for Bank BTN in 2022 with a capital deposit from government of Rp2,480,000 and paid up capital for the public Rp276,575.

Based on legal assessment that conducted by the bank, the additional capital through PMHMETD can already be recognized as paid-up capital due to the deed of amendment to the Bank's articles of association on March 16, 2023.

31. PENDAPATAN BUNGA DAN BAGI HASIL / *31. INTEREST INCOME AND INCOME FROM PROFIT SHARING*

a. Pendapatan Bunga / *a. Interest Income*

Akun ini terdiri dari: / *This account consists of:*

	Tahun yang berakhir pada Tanggal 31 Desember/ *For the year Ended December 31*			
	2024	**2023**	**2022**	
Biaya perolehan diamortisasi				***Amortized cost***
Kredit yang diberikan	23.175.484	22.387.831	20.955.847	*Loans*
Giro pada Bank Indonesia	417.741	480.068	217.757	*Current accounts with Bank Indonesia*
Penempatan pada Bank Indonesia dan bank lain	125.306	133.613	71.670	*Placements with Bank Indonesia and other banks*
Giro pada bank lain	1.592	2.568	1.311	*Current accounts with other banks*
Tagihan lainnya	19.239	8.210	5.805	*Others receivable*
Efek dibeli dengan janji dijual kembali	29.323	57.873	86.602	*Securities purchased under agreement to resell*
Obligasi pemerintah	619.449	620.967	453.703	*Government bonds*
Efek-efek	165.035	46.996	56.439	*Securities*
Nilai wajar melalui laba rugi				*Fair value through profit or loss*
Obligasi pemerintah	169.507	176.455	236.476	*Government bonds*
Efek-efek	75.030	80.180	82.222	*Securities*
Derivatif	80.940	81.505	55.005	*Derivative*
Nilai wajar melalui penghasilan komprehensif lain				*Fair value through other comprehensive income*
Obligasi pemerintah	398.891	423.226	828.759	*Government bonds*
Efek-efek	195.088	223.037	181.604	*Securities*
Total	**25.472.625**	**24.722.529**	**23.233.200**	***Total***

b. Bagi hasil dan marjin unit syariah / *b. Profit sharing and margin from sharia unit*

Akun ini terdiri dari: / *This account consists of:*

	Tahun yang berakhir pada Tanggal 31 Desember/ *For the year Ended December 31*			
	2024	**2023**	**2022**	
Pendapatan *murabahah*	2.555.953	2.242.259	1.657.741	*Income from murabahah*
Pendapatan bagi hasil *musyarakah*	356.586	339.310	322.992	*Musyarakah profit sharing income*
Pendapatan *istishna*	389.778	339.895	278.899	*Income from istishna*
Pendapatan bagi hasil *mudharabah*	1.468	11.906	25.771	*Mudharabah profit sharing income*
Pendapatan usaha utama lainnya	765.182	625.353	388.765	*Other main operating income*
Total	**4.068.967**	**3.558.723**	**2.674.168**	***Total***

32. BEBAN BUNGA, BAGI HASIL DAN BONUS

32. INTEREST, PROFIT SHARING AND BONUS EXPENSES

a. Beban Bunga

a. Interest Expense

Akun ini terdiri dari:

This account consists of:

	Tahun yang berakhir pada Tanggal 31 Desember/ *For the year Ended December 31*			
	2024	**2023**	**2022**	
Deposito berjangka	9.707.631	7.292.773	5.204.910	*Time deposits*
Giro	2.907.852	2.676.389	1.343.080	*Demand deposits*
Pinjaman yang diterima	1.417.941	1.240.294	1.133.603	*Fund borrowings*
Pinjaman subordinasi dan efek-efek subordinasi	598.776	593.559	596.092	*Subordinated loan and securities*
Tabungan	535.130	527.326	563.151	*Savings deposits*
Surat-surat berharga yang diterbitkan	441.754	559.845	880.152	*Securities issued*
Kewajiban derivatif	128.449	140.185	102.692	*Derivative liabilities*
Simpanan dari bank lain	86.054	97.192	36.387	*Deposits from other banks*
Efek yang dijual dengan janji dibeli kembali	89.872	75.545	6.852	*Securities sold under repurchase agreements*
Total	**15.913.459**	**13.203.108**	**9.866.919**	***Total***

b. Bonus Simpanan *Wadiah* dan Hak Pihak Ketiga atas Bagi hasil *Mudharabah*

b. Wadiah Deposit Bonus and Third Parties' Share on Return of Mudharabah

Bonus simpanan *wadiah*:

Wadiah deposit bonus:

	Tahun yang berakhir pada Tanggal 31 Desember/ *For the year Ended December 31*			
	2024	**2023**	**2022**	
Beban bonus simpanan *wadiah*:				*Wadiah bonus expenses:*
Giro *wadiah*	148.667	66.217	52.233	*Wadiah demand deposit*
Tabungan *wadiah*	4.779	5.404	5.325	*Wadiah saving deposit*
	153.446	**71.621**	**57.558**	

Hak bagi hasil *mudharabah*:

Mudharabah share on return:

	Tahun yang berakhir pada Tanggal 31 Desember/ *For the year Ended December 31*			
	2024	**2023**	**2022**	
Hak Pihak Ketiga atas Bagi hasil *Mudharabah*:				*Third Parties' Share on Return of Mudharabah:*
Deposito *mudharabah*	1.320.300	1.052.226	601.033	*Mudharabah time deposit*
Tabungan *mudharabah*	274.558	201.556	141.241	*Mudharabah saving deposit*
Pinjaman *mudharabah*	162.793	108.623	65.839	*Mudharabah borrowing*
Giro *mudharabah*	20.787	10.299	7.690	*Mudharabah demand deposit*
Sukuk *mudharabah*	3.121	212	-	*Mudharabah sukuk*
Total	**1.781.559**	**1.372.916**	**815.803**	***Total***

33. PENDAPATAN OPERASIONAL LAINNYA - LAIN-LAIN

Akun ini terdiri dari:

33. OTHER OPERATING INCOME - OTHERS

This account consists of:

	Tahun yang berakhir pada Tanggal 31 Desember/ *For the year Ended December 31*			
	2024	**2023**	**2022**	
Jasa perbankan	199.813	216.776	188.557	*Bank services*
Servicing Fee Sekuritisasi Aset	32.665	95.158	87.369	*Securitization Assets Servicing Fee*
Jasa penagihan - *payment points*	19.408	14.993	16.955	*Collection services - payment points*
Lainnya	900.852	983.820	529.894	*Others*
Total	**1.152.738**	**1.310.747**	**822.775**	***Total***

Jasa perbankan terdiri dari pendapatan dari transaksi transfer dana, pendapatan sewa *safe deposit box* dan pendapatan administrasi layanan ATM.

Bank services pertains to income from fund transfer transactions, safety deposit box rentals and ATM service charges.

Lainnya terutama terdiri dari provisi atas garansi bank yang diterbitkan, komisi yang diterima dari perusahaan asuransi atas produk asuransi yang terjual melalui Bank, penyelesaian atas dana titipan nasabah dan dana jaminan developer.

Others consist mainly of provision from bank guarantee issued, commission received from insurance companies for insurance products sold by the Bank to its borrowers, and settlement of customer's and developer's deposits.

34. PENYISIHAN (PEMBALIKAN) KERUGIAN PENURUNAN NILAI ASET KEUANGAN DAN NON- ASET KEUANGAN

Akun ini terdiri dari:

34. PROVISION FOR (REVERSAL OF) IMPAIRMENT LOSSES ON FINANCIAL AND NON-FINANCIAL ASSETS

This account consists of:

	Tahun yang berakhir pada Tanggal 31 Desember/ *For the year Ended December 31*			
	2024	**2023**	**2022**	
Kredit yang diberikan dan pembiayaan/piutang syariah (Catatan 11)	2.021.888	3.711.122	4.039.507	*Loans and sharia financing/ receivables (Note 11)*
Efek-efek (Catatan 8)	(19.271)	30.502	(19.259)	*Securities (Note 8)*
Giro pada bank lain (Catatan 6)	767	57	49	*Current accounts with other banks (Note 6)*
Tagihan Akseptasi (Catatan 13)	(21.889)	23.740	(487)	*Acceptance Receivable (Note 13)*
Properti Terbengkalai	-	(24)	(2.432)	*Abandoned Property*
Total	**1.981.495**	**3.765.397**	**4.017.378**	***Total***

35. BEBAN UMUM DAN ADMINISTRASI / *35. GENERAL AND ADMINISTRATIVE EXPENSES*

Akun ini terdiri dari: / *This account consists of:*

	Tahun yang berakhir pada Tanggal 31 Desember/ *For the year Ended December 31*			
	2024	**2023**	**2022**	
Perbaikan dan pemeliharaan	1.153.531	1.108.838	1.136.954	*Repairs and maintenance*
Promosi	551.571	537.253	469.580	*Promotion*
Penyusutan (Catatan 14)	526.983	489.874	426.546	*Depreciation (Note 14)*
Sewa bukan PSAK No. 116	414.410	357.523	388.480	*Lease expense non SFAS No. 116*
Listrik, air dan komunikasi	341.955	258.934	296.549	*Electricity, water and telecommunications*
Beban kantor	261.636	232.271	229.233	*Office expenses*
Jasa profesional	283.784	229.724	236.277	*Professional fees*
Beban depresiasi aset hak guna (Catatan 14)	204.497	226.851	202.514	*Depreciation expense of right of use asset (Note 14)*
Transportasi	192.500	171.228	135.604	*Transportation*
Outsourcing	263.732	45.173	54.833	*Outsourcing*
Lainnya	262.262	227.110	177.458	*Others*
Total	**4.456.861**	**3.884.779**	**3.754.028**	***Total***

Lainnya terutama terdiri dari beban administrasi *branchless banking,* biaya operasional program pemerintah, premi asuransi untuk gedung, biaya tenaga *outsourcing,* premi asuransi kas dalam perjalanan serta kas dalam khazanah dan beban operasional protokoler.

Others consist mainly of branchless banking administration expense, government program operational expense, outsourcing labor cost, insurance premium on the building, insurance premium on in transit and cash in vault and protocoler operational expenses.

36. GAJI DAN TUNJANGAN KARYAWAN / *36. SALARIES AND EMPLOYEE BENEFITS*

Akun ini terdiri dari: / *This account consists of:*

	Tahun yang berakhir pada Tanggal 31 Desember/ *For the year Ended December 31*			
	2024	**2023**	**2022**	
Gaji dan upah				*Salaries and wages*
Rutin	2.795.322	2.353.451	2.122.173	*Recurring*
Tidak rutin	1.510.080	1.495.120	1.954.049	*Non-recurring*
Pelatihan dan pengembangan	100.442	95.931	87.757	*Training and development*
Lainnya	39.731	38.001	26.319	*Others*
Total	**4.445.575**	**3.982.503**	**4.190.298**	***Total***

Lainnya terdiri dari beban imbalan kerja, biaya perekrutan, pesangon dan tunjangan rekreasi karyawan.

Others consists mainly of employee benefits expense, recruitment costs, severance costs and employee recreational costs.

37. BEBAN OPERASIONAL LAINNYA - LAIN-LAIN

Akun ini terdiri dari:

37. OTHER OPERATING EXPENSES - OTHERS

This account consists of:

	Tahun yang berakhir pada Tanggal 31 Desember/ *For the year Ended December 31*			
	2024	**2023**	**2022**	
Imbalan atas jasa penagihan	61.521	63.279	71.635	*Fees for collection services*
Kerugian atas penyelesaian kredit bermasalah	38.845	40.987	51.106	*Loss on bad debt settlement*
Lainnya	489.627	383.348	206.567	*Others*
Total	**589.993**	**487.614**	**329.308**	***Total***

Lainnya terutama terdiri dari beban representasi, jamuan makan dan minum rapat dan beban terkait dengan penyelesaian dana titipan nasabah dan dana jaminan developer.

Others consist mainly of representation, entertainment expense and expense related to the settlement of customer's and developer's deposits.

38. PENDAPATAN (BEBAN) BUKAN OPERASIONAL - NETO

Akun ini terdiri dari:

38. NON-OPERATING INCOME (EXPENSES) - NET

This account consists of:

	Tahun yang berakhir pada Tanggal 31 Desember/ *For the year Ended December 31*			
	2024	**2023**	**2022**	
Pendapatan sewa gedung	58	140	200	*Building rental income equipment*
Pendapatan (beban) lainnya - neto	(51.930)	(159.659)	60.687	*Other income (expense) - net*
Total	**(51.872)**	**(159.519)**	**60.887**	***Total***

Lainnya terutama terdiri dari keuntungan/(kerugian) revaluasi kurs, beban denda administrasi, keuntungan/(kerugian) jual beli mata uang asing dan beban bina lingkungan.

Others mainly consist of gains/(losses) on exchange rate revaluation, administrative penalty expenses, gains/(losses) on buying and selling foreign currencies and environmental development expenses.

39. PERPAJAKAN / *39. TAXATION*

a. Rekonsiliasi antara laba sebelum beban pajak menurut laporan laba rugi dan penghasilan komprehensif lain dengan taksiran penghasilan kena pajak, adalah sebagai berikut:

a. The reconciliation between income before tax expense, as shown in the statement of profit or loss and other comprehensive income are as follows:

	Tahun yang berakhir pada Tanggal 31 Desember/ *For the year Ended December 31*			
	2024	**2023**	**2022**	
Laba sebelum beban pajak	3.772.841	4.380.210	3.875.690	*Income before tax expense*
Beda temporer:				*Temporary differences:*
Penyisihan untuk imbalan kerja	238.070	19.804	274.687	*Provision for employee benefits*
Penurunan (kenaikan) nilai efek-efek yang dimiliki untuk diperdagangkan	213.455	59.053	(206.021)	*Decrease (increase) in fair value of trading securities*
Penyusutan aset hak guna	(28.356)	5.637	(3.753)	*Depreciation of Right of Use Asset*
Pembentukan cadangan kerugian penurunan nilai aset keuangan dan non-aset keuangan dan lainnya	(11.951.852)	(153.722)	928.143	*Provision for allowance for impairment losses on financial assets and non-financial assets and others*
Selisih nilai wajar efek-efek	1.091.193	803.279	-	*Difference in the fair value of securities*
	(10.437.490)	734.051	993.056	
Beda tetap:				*Permanent differences:*
Dana sosial dan representasi	22.129	10.231	113.258	*Social funds and representation*
Beban kantor	29.948	72.557	84.703	*Office expense*
Kenikmatan karyawan	79.829	65.214	136.692	*Employee welfare*
Sumbangan	89.175	79.996	62.204	*Donations*
Sewa	26	10.997	14.401	*Rent*
Perbaikan dan pemeliharaan	2.086	4.993	6.061	*Repairs and maintenance*
Penyusutan atas aset tetap yang tidak dapat disusutkan menurut pajak	2.250	2.407	3.031	*Depreciation of premises and equipment which are non-depreciable for tax purposes*
Pendapatan sewa tarif final	(46)	(128)	(200)	*Rent income subject to final tax*
Perubahan nilai EBA yang tidak dapat diakui secara pajak	29.248	(28)	60.514	*Changes in EBA fair value which are non-recognizable for tax purposes*
Lain-lain	1.535	1.036	15.316	*Others*
	256.180	247.275	495.980	
Taksiran penghasilan (rugi) kena pajak	(6.408.469)	5.361.536	5.364.726	*Estimated taxable income (loss)*
Beban pajak penghasilan	-	1.018.692	1.019.298	*Income tax expense*
Pajak penghasilan Pasal 25	(721.042)	(673.178)	(671.524)	*Income tax - Article 25*
Hutang pajak penghasilan Badan (Catatan 17)/(Uang Muka Pajak) (Catatan 16)	**(721.042)**	**345.514**	**347.774**	***Corporate income tax payable (Note 17)/(Prepaid Taxes) (Note 16)***

Taksiran rugi pajak hasil rekonsiliasi akan digunakan sebagai dasar untuk menyiapkan Surat Pemberitahuan Pajak (SPT) untuk tahun yang berakhir pada tanggal 31 Desember 2024.

Estimated taxable loss from the reconciliation will be used as basis for preparing annual tax return (SPT) for the year ended December 31, 2024.

39. PERPAJAKAN (lanjutan)

a. Rekonsiliasi antara laba sebelum beban pajak menurut laporan laba rugi dan penghasilan komprehensif lain dengan taksiran penghasilan kena pajak, adalah sebagai berikut: (lanjutan)

Berdasarkan Undang-undang Perpajakan yang berlaku di Indonesia, Bank menghitung, menetapkan dan membayar sendiri besarnya jumlah pajak yang terutang. Direktur Jendral Pajak ("DJP") dapat menetapkan atau mengubah liabilitas pajak dalam batas waktu 5 (lima) tahun sejak saat terutangnya pajak. Laba kena pajak hasil rekonsiliasi tahun 2023 dan 2022 adalah sesuai dengan SPT Tahunan Bank.

39. TAXATION (continued)

a. The reconciliation between income before tax expense, as shown in the statement of profit or loss and other comprehensive income are as follows: (continued)

Under the prevailing Taxation Laws of Indonesia, the Bank calculates, determines and pays tax payable based on self-assessment. The Directorate General of Taxes ("DGT") may assess or amend taxes within 5 (five) years from the time the tax becomes due. The taxable profit resulting from the reconciliation in 2023 and 2022 conform to the Bank's Annual Tax Return.

b. Beban/(manfaat) pajak

b. Tax Expense/(benefit)

	Tahun yang berakhir pada Tanggal 31 Desember/ *For the year Ended December 31*			
	2024	**2023**	**2022**	
Beban pajak - kini	-	1.018.692	1.019.298	*Current tax expense*
Beban/(manfaat) pajak - tangguhan	765.513	(139.470)	(188.681)	*Deferred tax expense/(benefit)*
Total	**765.513**	**879.222**	**830.617**	***Total***

c. Aset (Liabilitas) Pajak Tangguhan

Pengaruh pajak atas perbedaan temporer yang signifikan antara pelaporan keuangan dan pajak adalah sebagai berikut:

c. Deferred tax assets (liabilities)

The tax effects on significant outstanding temporary differences between financial and tax reporting purposes are as follows:

	31 Desember/*December 31*, 2024				
	Saldo awal/ ***Beginning balance***	**Dikreditkan/ (dibebankan) ke laporan laba rugi/ Credited/*(charged) to statement of profit or loss and other income***	**Dibebankan ke ekuitas/** ***Charged to equity***	**Saldo Akhir/** ***Ending Balance***	
Cadangan kerugian penurunan nilai kredit yang diberikan	2.328.612	(2.254.882)	-	73.730	*Allowance for impairment losses loans*
Cadangan kerugian penurunan nilai aset keuangan - selain kredit yang diberikan	21.303	(7.307)	-	13.996	*Allowance for impairment losses on financial assets - other than loans*
Cadangan kerugian penurunan nilai aset non keuangan	383	-	-	383	*Allowance for impairment losses on non non-financial assets*
Cadangan hukum, kecurangan (*fraud*) dan lainnya	24.354	(8.663)	-	15.691	*Allowance for legal, fraud and others*
Cadangan imbalan kerja	243.075	45.233	(31.977)	256.331	*Allowance for employee benefits*
Penyusutan aset hak guna	20.773	(5.387)	-	15.386	*Depreciation of right of use asset*
Rugi yang belum direalisasi atas efek yang diukur pada nilai wajar melalui laba rugi	760	40.557	-	41.317	*Unrealized loss on fair value through profit or loss*
Rugi yang belum direalisasi atas lindung nilai arus kas	7.588	-	2.753	10.341	*Unrealized loss on cash flow hedges*
(Laba) rugi yang belum direalisasi atas efek yang diukur pada nilai wajar melalui penghasilan komprehensif	198.811	-	82.493	281.304	*Unrealized (gain) loss on fair value through other comprehensive income*
Selisih nilai wajar efek-efek	152.623	207.326	-	359.949	*Differences in fair value of securities*
Rugi kena pajak	-	1.217.610	-	1.217.610	*Taxable loss*
Aset pajak tangguhan - neto	**2.998.282**	**(765.513)**	**53.269**	**2.286.038**	***Deferred tax assets - net***

39. PERPAJAKAN (lanjutan)

c. Aset (Liabilitas) Pajak Tangguhan (lanjutan)

Pengaruh pajak atas perbedaan temporer yang signifikan antara pelaporan keuangan dan pajak adalah sebagai berikut (lanjutan):

39. TAXATION (continued)

c. Deferred tax assets (liabilities) (continued)

The tax effects on significant outstanding temporary differences between financial and tax reporting purposes are as follows (continued):

31 Desember/*December 31,* 2023

	Saldo awal/ *Beginning balance*	**Dikreditkan/ (dibebankan) ke laporan laba rugi/ Credited/*(charged) to statement of profit or loss and other income***	**Dibebankan ke ekuitas/ *Charged to equity***	**Saldo Akhir/ *Ending Balance***	
Cadangan kerugian penurunan nilai kredit yang diberikan	2.358.305	(29.693)	-	2.328.612	*Allowance for impairment losses loans*
Cadangan kerugian penurunan nilai aset keuangan - selain kredit yang diberikan	11.580	9.723	-	21.303	*Allowance for impairment losses on financial assets - other than loans*
Cadangan kerugian penurunan nilai aset non keuangan	383	-	-	383	*Allowance for impairment losses on non non-financial assets*
Cadangan hukum, kecurangan (*fraud*) dan lainnya	33.591	(9.237)	-	24.354	*Allowance for legal, fraud and others*
Cadangan imbalan kerja	203.967	3.763	35.345	243.075	*Allowance for employee benefits*
Penyusutan aset hak guna	19.702	1.071	-	20.773	*Depreciation of right of use asset*
(Laba) rugi yang belum direalisasi atas efek yang diukur pada nilai wajar melalui laba rugi	(10.460)	11.220	-	760	*Unrealized (gain) loss on fair value through profit or loss*
Rugi yang belum direalisasi atas lindung nilai arus kas	11.565	-	(3.977)	7.588	*Unrealized loss on cash flow hedges*
(Laba) rugi yang belum direalisasi atas efek yang diukur pada nilai wajar melalui penghasilan komprehensif	292.088	-	(93.277)	198.811	*Unrealized (gain) loss on fair value through other comprehensive income*
Selisih nilai wajar efek-efek	-	152.623	-	152.623	*Differences in fair value of securities*
Lainnya	(5.293)	-	5.293	-	*Others*
Aset pajak tangguhan - neto	**2.915.428**	**139.470**	**(56.616)**	**2.998.282**	***Deferred tax assets - net***

31 Desember/*December 31,* 2022

	Saldo awal/ *Beginning balance*	**Dikreditkan/ (dibebankan) ke laporan laba rugi/ *Credited/(charged) to statement of profit or loss and other income***	**Dibebankan ke ekuitas/ *Charged to equity***	**Saldo Akhir/ *Ending Balance***	
Cadangan kerugian penurunan nilai kredit yang diberikan	2.116.831	241.474	-	2.358.305	*Allowance for impairment losses loans*
Cadangan kerugian penurunan nilai aset keuangan - selain kredit yang diberikan	15.120	(3.540)	-	11.580	*Allowance for impairment losses on financial assets - other than loans*
Cadangan kerugian penurunan nilai aset non keuangan	845	(462)	-	383	*Allowance for impairment losses on non non-financial assets*
Cadangan hukum, kecurangan (*fraud*) dan lainnya	94.716	(61.125)	-	33.591	*Allowance for legal, fraud and others*
Cadangan imbalan kerja	163.152	52.191	(11.376)	203.967	*Allowance for employee benefits*
Penyusutan aset hak guna	20.415	(713)	-	19.702	*Depreciation of right of use asset*
(Laba) rugi yang belum direalisasi atas efek yang diukur pada nilai wajar melalui laba rugi	28.684	(39.144)	-	(10.460)	*Unrealized (gain) loss on fair value through profit or loss*
Rugi yang belum direalisasi atas lindung nilai arus kas	-	-	11.565	11.565	*Unrealized loss on cash flow hedges*
(Laba) rugi yang belum direalisasi atas efek yang diukur pada nilai wajar melalui penghasilan komprehensif	(9.103)	-	295.898	286.795	*Unrealized (gain) loss on fair value through other comprehensive income*
Aset pajak tangguhan - neto	**2.430.660**	**188.681**	**296.087**	**2.915.428**	***Deferred tax assets - net***

39. PERPAJAKAN (lanjutan)

d. Rekonsiliasi antara beban pajak penghasilan dengan menggunakan tarif pajak yang berlaku dari laba sebelum beban pajak dan beban pajak penghasilan seperti yang disajikan dalam laporan laba rugi dan penghasilan komprehensif lain untuk periode yang berakhir pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022 adalah sebagai berikut:

39. TAXATION (continued)

d. The reconciliation between the tax expense computed by applying the applicable tax rate on the income before tax expense and the tax expense shown in the statement of profit or loss and other comprehensive income for the period ended December 31, 2024, 2023 and 2022, are as follows:

	Tahun yang berakhir pada Tanggal 31 Desember/ *For the year Ended December 31*			
	2024	**2023**	**2022**	
Laba sebelum beban pajak	3.772.841	4.380.210	3.875.690	*Income before tax expense*
Beban pajak dengan tarif pajak yang berlaku	(716.840)	(832.240)	(736.381)	*Tax expense at the applicable tax rate*
Beda tetap	(48.673)	(46.982)	(94.236)	*Permanent differences*
Beban pajak	**(765.513)**	**(879.222)**	**(830.617)**	***Tax expense***

e. Penurunan Tarif Pajak Penghasilan Badan

Pada tanggal 31 Maret 2020, Pemerintah menerbitkan Peraturan Pemerintah Pengganti Undang-Undang (Perpu) Republik Indonesia No. 1 Tahun 2020 yang telah menjadi Undang-Undang (UU) No. 2 Tahun 2020, serta menetapkan Peraturan Pemerintah (PP) No. 30 Tahun 2020 tentang Penurunan Tarif Pajak Penghasilan bagi Wajib Pajak Badan Dalam Negeri yang Berbentuk Perseroan Terbuka dan berlaku sejak tanggal 19 Juni 2020. Aturan tersebut menetapkan penurunan tarif pajak penghasilan wajib pajak badan dalam negeri dan bentuk usaha tetap dari semula 25% menjadi 22% untuk tahun pajak 2021 dan 2022 dan 20% mulai tahun pajak 2022 dan seterusnya, serta pengurangan lebih lanjut tarif pajak sebesar 3% untuk wajib pajak dalam negeri yang memenuhi persyaratan tertentu.

Berdasarkan Undang-Undang No. 7 tahun 2021 tentang Harmonisasi Peraturan Perpajakan yang berlaku 1 Januari 2022 maka tarif pajak kembali ke tarif pajak tunggal yaitu 22%.

e. Reduction of the Tax Rate of Corporate Income Tax

On 31 March 2020, the Government issue Government Regulation in Lieu of Law (Perpu) of the Republic of Indonesia No. 1 of 2020 which has become Law (UU) No. 2 of 2020, as well as stipulated Government Regulation (PP) No. 30 of 2020 concerning Tariff Reduction for Domestic Public Companies Taxpayers and effective since 19 June 2020. The regulation has stipulated the reduction in the income tax rates for domestic corporate taxpayers and business establishments from 25% to 22% for Fiscal Year 2021 and 2022 and 20% for the Fiscal Year 2022 onwards, and a further reduction of the tax rate by 3% for domestic taxpayers who meet certain requirements.

Based Law No. 7 of 2021 regarding Harmonisation of the Tax Regulation witch applies on January 1, 2022 therefore the tax rate is a single rate of 22%.

39. PERPAJAKAN (lanjutan)

e. Penurunan Tarif Pajak Penghasilan Badan (lanjutan)

Berdasarkan surat keterangan No. DE/I/2025-0037 tanggal 3 Januari 2025 dan laporan bulanan kepemilikan saham dari Biro Administrasi Efek, Datindo Entrycom atas kepemilikan saham Bank selama periode 2024 yang berakhir pada tanggal 31 Desember 2024 semua kriteria di atas untuk memperoleh fasilitas penurunan tarif pajak tersebut atas laporan keuangan Bank untuk tahun yang berakhir pada tanggal 31 Desember 2024 telah terpenuhi.

Berdasarkan surat keterangan No. DE/I/2024-0035 tanggal 3 Januari 2024 dan laporan bulanan kepemilikan saham dari Biro Administrasi Efek, Datindo Entrycom atas kepemilikan saham Bank selama periode 2023 yang berakhir pada tanggal 31 Desember 2023 semua kriteria di atas untuk memperoleh fasilitas penurunan tarif pajak tersebut atas laporan keuangan Bank untuk tahun yang berakhir pada tanggal 31 Desember 2023 telah terpenuhi.

Berdasarkan surat keterangan No. DE/I/2023-0038 tanggal 3 Januari 2023 dan laporan bulanan kepemilikan saham (Formulir No. X.H.I-2 tanggal 3 Januari 2023 dari Biro Administrasi Efek, Datindo Entrycom atas kepemilikan saham Bank selama periode 2022 yang berakhir pada tanggal 31 Desember 2022) semua kriteria di atas untuk memperoleh fasilitas penurunan tarif pajak tersebut atas laporan keuangan Bank untuk tahun yang berakhir pada tanggal 31 Desember 2022 telah terpenuhi.

Pajak penghasilan badan Bank untuk tahun yang berakhir pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022 telah dihitung dengan menggunakan tarif pajak 19%.

39. TAXATION (continued)

e. Reduction of the Tax Rate of Corporate Income Tax (continued)

Based on Letter No. DE/I/2025-0037 dated January 3, 2025 and the monthly report of shares ownerships form the Securities Administration Agency (Biro Administrasi Efek), Datindo Entrycom on the ownership of Bank's shares during the period ended December 31, 2024, all of the above mentioned required criteria to obtain the tax rate reduction on Bank's financial statements for the year then ended December 31, 2024 were fulfilled by the Bank.

Based on Letter No. DE/I/2024-0035 dated January 3, 2024 and the monthly report of shares ownerships form the Securities Administration Agency (Biro Administrasi Efek), Datindo Entrycom on the ownership of Bank's shares during the period ended December 31, 2023, all of the above mentioned required criteria to obtain the tax rate reduction on Bank's financial statements for the year then ended December 31, 2023 were fulfilled by the Bank.

Based on Letter No. DE/I/2023-0038 dated January 3, 2023 and the monthly report of shares ownerships (form No. X.H.I-2 dated January 3, 2023 from the Securities Administration Agency (Biro Administrasi Efek), Datindo Entrycom on the ownership of Bank's shares during the period ended December 31, 2022), all of the above mentioned required criteria to obtain the tax rate reduction on Bank's financial statements for the year ended December 31, 2022 were fulfilled by the Bank.

Bank's corporate income tax for the year ended December 31, 2024, 2023 and 2022 are calculated using the tax rate of 19%.

39. PERPAJAKAN (lanjutan)

e. Penurunan Tarif Pajak Penghasilan Badan (lanjutan)

Pada tanggal 10 Oktober 2024, Pemerintah menerbitkan Peraturan Menteri Keuangan (PMK) Nomor 74 Tahun 2024 tentang Pembentukkan Cadangan Piutang Tak Tertagih yang Boleh Dikurangkan dari Penghasilan Bruto. Sesuai dengan ketentuan peralihan dalam Peraturan Menteri Keuangan Republik Indonesia Nomor 74 Tahun 2024, Bank telah melaksanakan perhitungan nilai tercatat cadangan piutang tak tertagih untuk awal tahun fiskal 2024 dan selisih lebih sebesar Rp11.517.405 dan diakui sebagai biaya yang dibebankan seluruhnya untuk tahun fiskal 2024. Terkait dengan hal tersebut, aset pajak tangguhan yang dimanfaatkan BTN pada tahun fiskal 2024 sebesar Rp 2.188.307.

39. TAXATION (continued)

e. Reduction of the Tax Rate of Corporate Income Tax (continued)

On October 10, 2024, the Government issued Minister of Finance Regulation (PMK) Number 74 Year 2024 concerning Guidelines for the Establishment of an Reserve for Uncollectible Accounts that can be Deductible from Gross Income. Based on the transitional provisions in the Regulation of the Minister of Finance of the Republic of Indonesia Number 74 of 2024, Bank has calculated the carrying value of the allowance for doubtful accounts for the beginning of the fiscal year 2024, and the excess amounting to Rp 11,517,405 recognised as an expense fully charged to the fiscal year 2024. In relation to the above, BTN utilized deferred tax assets amounting to Rp 2,188,307 in the fiscal year 2024.

40. KOMITMEN DAN KONTINJENSI

Saldo komitmen dan kontinjensi pada tanggal 31 Desember 2024, 2023 dan 2022 adalah sebagai berikut:

40. COMMITMENTS AND CONTINGENCIES

The outstanding commitments and contingencies as of December 31, 2024, 2023 and 2022 are as follows:

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
KOMITMEN				***COMMITMENTS***
Liabilitas komitmen				*Commitments payable*
Fasilitas kredit kepada nasabah yang belum ditarik	15.614.895	18.933.652	15.109.981	*Unused loan facility commitments*
Irrevocable L/C yang masih berjalan (Catatan 28)	249.694	20.106	221.484	*Outstanding irrevocable L/Cs (Note 28)*
Komitmen - neto	15.864.589	18.953.758	15.331.465	*Commitments - net*
KONTINJENSI				***CONTINGENCIES***
Tagihan kontinjensi				*Contingent receivables*
Pendapatan bunga dalam penyelesaian	3.550.319	3.598.041	6.855.269	*Interest income on non-performing assets*
Liabilitas kontinjensi				*Contingent payables*
Garansi yang diterbitkan (Catatan 28)	(3.124.003)	(2.579.175)	(948.495)	*Guarantees issued (Note 28)*
Kontinjensi - neto	426.316	1.018.866	5.906.774	*Contingencies - net*

41. IMBALAN KERJA

Program pensiun imbalan pasti

Program dana Pensiun diadministrasikan dan dikelola oleh Dana Pensiun PT Bank Tabungan Negara (Persero) Tbk (DPBTN).

41. EMPLOYEE BENEFITS

Defined benefit pension plan

The Pension Plan's assets are being administered and managed by Dana Pensiun PT Bank Tabungan Negara (Persero) Tbk (DPBTN).

41. IMBALAN KERJA (lanjutan)

Program pensiun imbalan pasti (lanjutan)

Sesuai dengan ketentuan Dana Pensiun, Program Pensiun dibiayai dari iuran karyawan dan iuran Bank. Iuran karyawan adalah sebesar 5% dari penghasilan dasar pensiun karyawan dan atas sisa jumlah yang perlu didanakan kepada DPBTN merupakan kontribusi Bank.

Efektif tanggal 1 Januari 2004, semua pekerja yang baru diangkat sebagai pekerja tetap tidak diikutsertakan dalam program pensiun imbalan pasti (DPBTN), namun demikian, karyawan Bank diikutsertakan dalam program pensiun iuran pasti yang berlaku efektif sejak bulan Januari 2004. Program Pensiun ini dikelola oleh Dana Pensiun Lembaga Keuangan PT Bank Negara Indonesia (Persero) Tbk (DPLK).

Beban pensiun iuran pasti yang telah dibebankan pada laporan laba rugi adalah sebesar Rp55.238, Rp43.871 dan Rp35.782 masing-masing untuk tahun yang berakhir pada tanggal 31 Desember 2024, 2023 dan 2022.

Imbalan kerja jangka panjang lainnya

Bank memberikan imbalan kerja kepada pegawai berupa penghargaan masa kerja dan Masa Persiapan Pensiun (MPP) yaitu 1 (satu) tahun sebelum pegawai mencapai usia pensiun normal (usia 56 tahun).

Masa Persiapan Pensiun (MPP) adalah Masa Pegawai Tetap dibebastugaskan karena telah mendekati usia pensiun normal. Pada ketentuan sebelumnya (Surat Edaran Direksi Nomor 62/SE/DIR/HCSD/2019) dijelaskan bahwa Pegawai Tetap yang telah memasuki usia 55 tahun maka akan melaksanakan MPP dengan Hak upah berupa Gaji Pokok Pegawai bulan terakhir hingga Pegawai ybs memasuki usia pensiun (56 tahun), apabila dipandang perlu karena keahlian/pengalaman Pegawai Tetap yang bersangkutan masih diperlukan, Direksi dapat menangguhkan/ menghapuskan MPP yang bersangkutan dan selama dipekerjakan yang bersangkutan tetap diberikan penghasilan seperti halnya pada waktu Pegawai Tetap tersebut masih aktif (sebelum MPP).

41. EMPLOYEE BENEFITS (continued)

Defined benefit pension plan (continued)

According to the Pension Fund regulation, the pension plan is funded through contributions from both the employees and the Bank. Employees' contributions are computed at 5% of the employees' basic pension salaries and any remaining amount required to fund DPBTN represents the contributions by the Bank.

Effective January 1, 2004, all newly appointed permanent employees are not included in the defined benefit pension plan (DPBTN), instead, the Bank's employees are included in the defined contribution pension plan which was effective since January 2004. This defined contribution pension plan is managed by Dana Pensiun Lembaga Keuangan PT Bank Negara Indonesia (Persero) Tbk (DPLK).

Defined contribution pension expense that was charged to profit or loss amounted to Rp55,238, Rp Rp43,871 and Rp35,782 for the years ended December 31, 2024, 2023 and 2022, respectively.

Other long-term employee benefits

The Bank provides employee benefits in the form of allowance for gratuity for services and retirement preparation period (MPP), which is within 1 (one) year before the normal pension age (56 years old).

Retirement Preparation Period (MPP) is the period when permanent employees are dismissed because they are approaching normal retirement age. In the previous provisions (Circular Letter of the Board of Directors Number 62/SE/DIR/HCSD/2019) it is explained that Permanent Employees who have entered the age of 55 will carry out MPP with Wage Rights in the form of the last month's Basic Employee Salary until the Employee concerned enters retirement age (56 years), if it is deemed necessary because the expertise/experience of the Permanent Employee concerned is still needed, the Board of Directors can suspend/remove the MPP concerned and while employed the person concerned is still given income as was the case when the Permanent Employee was still active (before MPP).

41. IMBALAN KERJA (lanjutan)

Imbalan kerja jangka panjang lainnya (lanjutan)

Terdapat perubahan ketentuan pelaksanaan MPP sebagaimana ditetapkan pada Perjanjian Kerja Bersama (PKB) Bank BTN tahun 2022 pasal 69 ayat 1 dimana Pegawai yang memasuki usia MPP (55 tahun) maka akan tetap bekerja hingga usia pensiun (56 tahun) dan apabila Pegawai ingin menjalani MPP maka dapat mengajukan permohonan kepada Perusahaan. Perubahan ketentuan pelaksanaan MPP tersebut juga telah disosialisasikan kepada seluruh Pegawai Bank berdasarkan memo nomor 244/M/HCSD/HCSP/IX/2022 dan nomor 370/M/HCMD/ER/IX/2022 perihal Pemberitahuan Perubahan Ketentuan Masa Persiapan Pensiun (MPP).

Karyawan Bank juga memperoleh manfaat dari pemberian program kesejahteraan, kontribusi karyawan terhadap dana kesejahteraan sebesar 0,00% dikali gaji bersih dan kontribusi Bank sebesar 3,50%. Aset program diadministrasikan dan dikelola oleh Yayasan Kesejahteraan Pegawai PT Bank Tabungan Negara (YKPBTN).

Perhitungan aktuaris atas imbalan kerja pada tanggal 31 Desember 2024, 2023 dan 2022 masing-masing adalah berdasarkan laporan aktuaris tanggal 6 Februari 2025, 5 Februari 2024 dan 13 Februari 2023 dari aktuaris Kantor Konsultan Aktuaria Santhi Devi dan Ardianto Handoyo dengan menggunakan metode "*Projected Unit Credit*".

41. EMPLOYEE BENEFITS (continued)

Other long-term employee benefits (continued)

There are changes to the provisions for implementing MPP as stipulated in the Bank BTN Collective Labor Agreement (PKB) in 2022 article 69 paragraph 1 where Employees who enter MPP age (55 years) will continue to work until retirement age (56 years) and if Employees wish to undergo MPP then may apply to the Company. The changes to the MPP implementation provisions have also been socialized to all Bank employees based on memos number 244/M/HCSD/HCSP/IX/2022 and number 370/M/HCMD/ER/IX/2022 regarding Notification of Changes in Retirement Preparation Period (MPP).

Bank employees are also given welfare program, employees' contributions are 0.00% of their net wages for welfare program benefits and the Bank contributions are 3.50%. The plan assets are being administered and managed by Yayasan Kesejahteraan Pegawai PT Bank Tabungan Negara (YKPBTN).

The actuarial valuation of employee benefits as of December 31, 2024, 2023 and 2022, are based on the actuarial reports dated February 6, 2025, February 5, 2024 and February 13, 2023, of Kantor Konsultan Aktuaria Santhi Devi dan Ardianto Handoyo respectively, using the "Projected Unit Credit" method.

	31 Desember/ *December 31,* 2024	**31 Desember/ *December 31,* 2023**	**31 Desember/ *December 31,* 2022**	
Asumsi ekonomi:				*Economics assumptions:*
Tingkat kenaikan penghasilan dasar pensiun	8,00%	8,00%	6,00%	*Basic pensionable annual salary increase rate*
Tingkat diskonto per tahun sebelum usia pensiun normal	7,00%	6,75%	7,00%	*Annual discount rate before normal retirement age*
Asumsi lainnya:				*Other assumptions:*
Usia pensiun normal	56 tahun/years	56 tahun/*years*	56 tahun/*years*	*Normal retirement age*
Tingkat mortalita (kematian)	TMI-2019	TMI-2019	TMI-2019	*Mortality rate*
Tingkat cacat	1,00% mortalita/ *mortality*	1,00% mortalita/ *mortality*	1,00% mortalita/ *mortality*	*Disability rate*
Asumsi lainnya:				*Other assumptions:*
Tingkat Diskonto per tahun untuk:				*Annual Discount rate:*
Imbalan Jangka Panjang Lainnya - Penghargaan Masa Kerja	7,00%	6,75%	7,00%	*Other long-term benefits Gratuity*
Program Pesangon Pensiun - Selisih DPLK	7,00%	6,75%	7,00%	*Retirement severance program Difference from DPLK*
Masa Persiapan Pensiun	7,00%	6,75%	7,00%	*Retirement Preparation Period*
Program Pensiun Imbalan Pasti	7,00%	6,75%	7,25%	*Deferred Benefit Pension Plan*
Program Kesejahteraan	7,00%	6,75%	7,00%	*Welfare Program*
Tingkat pengunduran diri				*Turnover rate*
Umur 25	5,00%	5,00%	5,00%	*Age 25*
Umur 30	5,00%	5,00%	5,00%	*Age 30*
Umur 35	5,00%	5,00%	5,00%	*Age 35*
Umur 40	5,00%	5,00%	5,00%	*Age 40*
Umur 45	5,00%	5,00%	5,00%	*Age 45*
Umur 50	3,00%	4,00%	3,00%	*Age 50*
Umur 55	9,00%	9,00%	9,00%	*Age 55*

41. IMBALAN KERJA (lanjutan)

Penghargaan masa kerja, program pesangon pensiun-selisih DPLK, masa persiapan pensiun dan program kesejahteraan dicantumkan dalam program lainnya.

a. Biaya imbalan kerja

41. EMPLOYEE BENEFITS (continued)

Gratuity for services, retirement severance program-difference from DPLK, retirement preparation period and welfare program are included in other benefits.

a. Employee benefits expense

	31 Desember/*December 31,* 2024			
	Program Pensiun/ *Pension Plan*	**Program Lainnya/ *Other Benefits***	**Total**	
Biaya jasa kini	32.751	177.907	210.658	*Current service cost*
Iuran peserta	(6.479)	(6.666)	(13.145)	*Contribution from participant*
Beban bunga neto	9.759	74.384	84.143	*Net interest cost*
Kerugian aktuaria	-	26.313	26.313	*Actuarial loss*
Biaya jasa lalu	93.324	-	93.324	*Past service cost*
Beban imbalan kerja - neto	**129.355**	**271.938**	**401.293**	***Employee benefits expense - net***

	31 Desember/*December 31,* 2023			
	Program Pensiun/ *Pension Plan*	**Program Lainnya/ *Other Benefits***	**Total**	
Biaya jasa kini	34.991	161.198	196.189	*Current service cost*
Iuran peserta	(6.527)	(6.728)	(13.255)	*Contribution from participant*
Beban bunga neto	1.271	63.231	64.502	*Net interest cost*
Kerugian aktuaria	-	(41.361)	(41.361)	*Actuarial loss*
Biaya jasa lalu	(12.446)	(23.817)	(36.263)	*Past service cost*
Beban imbalan kerja - neto	**17.289**	**152.523**	**169.812**	***Employee benefits expense - net***

	31 Desember/*December 31,* 2022			
	Program Pensiun/ *Pension Plan*	**Program Lainnya/ *Other Benefits***	**Total**	
Biaya jasa kini	35.276	106.523	141.799	*Current service cost*
Iuran peserta	(7.050)	(7.153)	(14.203)	*Contribution from participant*
Beban bunga neto	5.394	46.104	51.498	*Net interest cost*
Kerugian aktuaria	-	76.053	76.053	*Actuarial loss*
Biaya jasa lalu	11.460	256.180	267.640	*Past service cost*
Perubahan metode atribusi	-	(68.659)	(68.659)	*Change in benefit attribution method*
Beban imbalan kerja - neto	**45.080**	**409.048**	**454.128**	***Employee benefits expense – net***

41. IMBALAN KERJA (lanjutan) / *41. EMPLOYEE BENEFITS (continued)*

Penghargaan masa kerja, program pesangon pensiun-selisih DPLK, masa persiapan pensiun dan program kesejahteraan dicantumkan dalam program lainnya.(lanjutan)

Gratuity for services, retirement severance program-difference from DPLK, retirement preparation period and welfare program are included in other benefits. (continued)

b. Mutasi atas kewajiban imbalan kerja / *b. Movements of liabilities for employee benefits*

	31 Desember/*December 31,* 2024			
	Program Pensiun/ *Pension Plan*	**Program Lainnya/ *Other Benefits***	**Total**	
Saldo awal	155.783	1.123.559	1.279.342	*Beginning balance*
Beban imbalan kerja tahun berjalan - neto	129.355	271.938	401.293	*Employee benefits expense during the year - net*
Pengukuran kembali liabilitas (aset) imbalan kerja - neto	(179.239)	10.938	(168.301)	*Reameasurement of employee benefit liability (asset) - net*
Pembayaran iuran tahun berjalan	(44.625)	(118.598)	(163.223)	*Payment contribution from current year*
Saldo kewajiban pada akhir tahun (Catatan 29)	**61.274**	**1.287.837**	**1.349.111**	***Balance liabilities at end of year (Note 29)***

	31 Desember/*December 31,* 2023			
	Program Pensiun/ *Pension Plan*	**Program Lainnya/ *Other Benefits***	**Total**	
Saldo awal	107.214	966.297	1.073.511	*Beginning balance*
Beban imbalan kerja tahun berjalan - neto	17.289	152.523	169.812	*Employee benefits expense during the year - net*
Pengukuran kembali liabilitas (aset) imbalan kerja - neto	76.466	109.561	186.027	*Reameasurement of employee benefit liability (asset) - net*
Pembayaran iuran tahun berjalan	(45.186)	(104.822)	(150.008)	*Payment contribution from current year*
Saldo kewajiban pada akhir tahun (Catatan 29)	**155.783**	**1.123.559**	**1.279.342**	***Balance liabilities at end of year (Note 29)***

	31 Desember/*December 31,* 2022			
	Program Pensiun/ *Pension Plan*	**Program Lainnya/ *Other Benefits***	**Total**	
Saldo awal	148.266	710.429	858.695	*Beginning balance*
Beban imbalan kerja tahun berjalan - neto	45.080	409.048	454.128	*Employee benefits expense during the year - net*
Pengukuran kembali liabilitas (aset) imbalan kerja - neto	(49.512)	(10.360)	(59.872)	*Reameasurement of employee benefit liability (asset) - net*
Pembayaran iuran tahun berjalan	(36.620)	(142.820)	(179.440)	*Payment contribution from current year*
Saldo kewajiban pada akhir tahun (Catatan 29)	**107.214**	**966.297**	**1.073.511**	***Balance liabilities at end of year (Note 29)***

41. IMBALAN KERJA (lanjutan) / *41. EMPLOYEE BENEFITS (continued)*

c. Mutasi nilai kini liabilitas imbalan kerja adalah sebagai berikut: / *The movements in the present value of liabilities for employee benefits are as follows:*

	31 Desember/*December 31,* 2024			
	Program Pensiun/ *Pension Plan*	**Program Lainnya/ *Other Benefits***	**Total**	
Saldo awal	2.446.131	2.098.070	4.544.201	*Beginning balance*
Biaya jasa kini	32.751	177.907	210.658	*Current service cost*
Beban bunga	162.884	139.044	301.928	*Interest cost*
Biaya jasa lalu	93.324	-	93.324	*Past service cost*
Manfaat yang dibayarkan	(182.044)	(202.096)	(384.140)	*Benefits paid*
Kerugian/(keuntungan) aktuaria	(29.345)	44.197	14.852	*Actuarial loss/(gain)*
Saldo pada akhir tahun	**2.523.701**	**2.257.122**	**4.780.823**	***Balance at the end of year***

	31 Desember/*December 31,* 2023			
	Program Pensiun/ *Pension Plan*	**Program Lainnya/ *Other Benefits***	**Total**	
Saldo awal	2.226.053	1.930.356	4.156.409	*Beginning balance*
Biaya jasa kini	34.991	161.198	196.189	*Current service cost*
Beban bunga	156.762	127.009	283.771	*Interest cost*
Biaya jasa lalu	(12.446)	(23.817)	(36.263)	*Past service cost*
Manfaat yang dibayarkan	(155.673)	(186.015)	(341.688)	*Benefits paid*
Kerugian/(keuntungan) aktuaria	196.444	89.339	285.783	*Actuarial loss/(gain)*
Saldo pada akhir tahun	**2.446.131**	**2.098.070**	**4.544.201**	***Balance at the end of year***

	31 Desember/*December 31,* 2022			
	Program Pensiun/ *Pension Plan*	**Program Lainnya/ *Other Benefits***	**Total**	
Saldo awal	2.186.761	1.633.262	3.820.023	*Beginning balance*
Biaya jasa kini	35.276	106.523	141.799	*Current service cost*
Beban bunga	152.585	110.738	263.323	*Interest cost*
Biaya jasa lalu	11.460	256.180	267.640	*Past service cost*
Manfaat yang dibayarkan	(140.158)	(208.970)	(349.128)	*Benefits paid*
Perubahan metode atribusi	-	(68.660)	(68.660)	*Change in benefit attribution method*
Kerugian/(keuntungan) aktuaria	(19.871)	101.283	81.412	*Actuarial loss/(gain)*
Saldo pada akhir tahun	**2.226.053**	**1.930.356**	**4.156.409**	***Balance at the end of year***

d. Mutasi nilai wajar aset program adalah sebagai berikut: / *The movements in the fair value of plan assets are as follows:*

	31 Desember/*December 31,* 2024			
	Program Pensiun/ *Pension Plan*	**Program Lainnya/ *Other Benefits***	**Total**	
Saldo awal	2.290.350	1.072.990	3.363.340	*Beginning balance*
Hasil pengembangan aset program	303.018	86.285	389.303	*Return on plan asset*
Kontribusi Bank	44.625	26.688	71.313	*Contributions by the Bank*
Kontribusi pegawai	6.480	6.666	13.146	*Employees contribution*
Manfaat yang dibayarkan	(182.044)	(110.185)	(292.229)	*Benefits paid*
Saldo pada akhir tahun	**2.462.429**	**1.082.444**	**3.544.873**	***Balance at the end of year***

41. IMBALAN KERJA (lanjutan) / *41. EMPLOYEE BENEFITS (continued)*

d. Mutasi nilai wajar aset program adalah sebagai berikut: (lanjutan) / *d. The movements in the fair value of plan assets are as follows: (continued)*

	31 Desember/*December 31,* 2023			
	Program Pensiun/ *Pension Plan*	**Program Lainnya/ *Other Benefits***	**Total**	
Saldo awal	2.118.844	1.030.736	3.149.580	*Beginning balance*
Hasil pengembangan aset program	275.470	116.700	392.170	*Return on plan asset*
Kontribusi Bank	45.183	26.056	71.239	*Contributions by the Bank*
Kontribusi pegawai	6.526	6.729	13.255	*Employees contribution*
Manfaat yang dibayarkan	(155.673)	(107.231)	(262.904)	*Benefits paid*
Saldo pada akhir tahun	**2.290.350**	**1.072.990**	**3.363.340**	***Balance at the end of year***

	31 Desember/*December 31,* 2022			
	Program Pensiun/ *Pension Plan*	**Program Lainnya/ *Other Benefits***	**Total**	
Saldo awal	2.038.499	995.996	3.034.495	*Beginning balance*
Hasil pengembangan aset program	176.833	93.752	270.585	*Return on plan asset*
Kontribusi Bank	36.620	29.036	65.656	*Contributions by the Bank*
Kontribusi pegawai	7.050	7.153	14.203	*Employees contribution*
Manfaat yang dibayarkan	(140.158)	(95.201)	(235.359)	*Benefits paid*
Saldo pada akhir tahun	**2.118.844**	**1.030.736**	**3.149.580**	***Balance at the end of year***

e. Pengukuran kembali (aset) liabilitas imbalan kerja neto: / *e. Remeasurement of net employee benefit (asset) liabilities:*

	31 Desember/*December 31,* 2024			
	Program Pensiun/ *Pension Plan*	**Program Lainnya/ *Other Benefits***	**Total**	
Saldo awal	222.024	469.752	691.776	*Beginning balance*
Kerugian aktuaris	(29.345)	17.884	(11.461)	*Actuary loss*
Imbal hasil atas aset program	(149.894)	(16.446)	(166.340)	*Return on plan assets*
Perubahan atas dampak atas aset diluar bunga neto aset/liabilitas	-	9.500	9.500	*Change in effect of the asset ceiling excluding net interest of asset/liabilities*
Saldo pada akhir tahun	**42.785**	**480.690**	**523.475**	***Balance at the end of year***

	31 Desember/*December 31,* 2023			
	Program Pensiun/ *Pension Plan*	**Program Lainnya/ *Other Benefits***	**Total**	
Saldo awal	145.559	360.188	505.747	*Beginning balance*
Kerugian aktuaris	196.444	130.699	327.143	*Actuary loss*
Imbal hasil atas aset program	(119.979)	(46.916)	(166.895)	*Return on plan assets*
Perubahan atas dampak atas aset diluar bunga neto aset/liabilitas	-	25.781	25.781	*Change in effect of the asset ceiling excluding net interest of asset/liabilities*
Saldo pada akhir tahun	**222.024**	**469.752**	**691.776**	***Balance at the end of year***

41. IMBALAN KERJA (lanjutan) / *41. EMPLOYEE BENEFITS (continued)*

e. Pengukuran kembali (aset) liabilitas imbalan kerja neto: (lanjutan)

e. Remeasurement of net employee benefit (asset) liabilities: (continued)

	31 Desember/*December 31,* 2022			
	Program Pensiun/ *Pension Plan*	**Program Lainnya/ *Other Benefits***	**Total**	
Saldo awal	195.072	370.549	565.621	*Beginning balance*
Kerugian aktuaris	(19.871)	25.231	5.360	*Actuary loss*
Imbal hasil atas aset program	(29.642)	(21.199)	(50.841)	*Return on plan assets*
Perubahan atas dampak atas aset diluar bunga neto aset/liabilitas	-	(14.391)	(14.391)	*Change in effect of the asset ceiling excluding net interest of asset/liabilities*
Saldo pada akhir tahun	**145.559**	**360.190**	**505.749**	***Balance at the end of year***

f. Portofolio investasi aset program yang ditempatkan dalam bentuk instrumen keuangan yang terdiri dari reksadana, efek beragunan aset, surat berharga negara, obligasi, deposito berjangka dan saham.

Status pendanaan imbalan kerja per 31 Desember 2024, 2023 dan 2022 disajikan sebagai berikut:

f. The asset program's investment portfolio is placed in the form of financial instruments including mutual funds, asset backed securities, government securities, bonds, time deposits and shares of stocks.

Funding status of employee benefit as of December 31, 2024, 2023 and 2022 are as follow:

	31 Desember/*December 31,* 2024			
	Program Pensiun/ *Pension Plan*	**Program Kesejahteraan/ *Welfare Benefits***	**Total**	
Nilai wajar aset dana (tidak diaudit)	2.462.429	1.082.444	3.544.873	*Fair value of plan assets (unaudited)*
Nilai kini liabilitas manfaat pasti yang didanai	(2.523.701)	(969.284)	(3.492.985)	*Present value of funded defined benefit obligation*
Selisih lebih (kurang) pendanaan	(61.272)	113.160	51.888	*Funding surplus (deficit)*
Selisih lebih pendanaan yang tidak diakui	-	(113.160)	(113.160)	*Asset adjustment*
Kewajiban - neto	**(61.272)**	**-**	**(61.272)**	***Liabilities - net***

	31 Desember/*December 31,* 2023			
	Program Pensiun/ *Pension Plan*	**Program Kesejahteraan/ *Welfare Benefits***	**Total**	
Nilai wajar aset dana (tidak diaudit)	2.290.350	1.072.990	3.363.340	*Fair value of plan assets (unaudited)*
Nilai kini liabilitas manfaat pasti yang didanai	(2.446.131)	(974.509)	(3.420.640)	*Present value of funded defined benefit obligation*
Selisih lebih (kurang) pendanaan	(155.781)	98.481	(57.300)	*Funding surplus (deficit)*
Selisih lebih pendanaan yang tidak diakui	-	(98.481)	(98.481)	*Asset adjustment*
Kewajiban - neto	**(155.781)**	**-**	**(155.781)**	***Liabilities - net***

41. IMBALAN KERJA (lanjutan) / *41. EMPLOYEE BENEFITS (continued)*

f. Portofolio investasi aset program yang ditempatkan dalam bentuk instrumen keuangan yang terdiri dari reksadana, efek beragunan aset, surat berharga negara, obligasi, deposito berjangka dan saham. (lanjutan)

f. The asset program's investment portfolio is placed in the form of financial instruments including mutual funds, asset backed securities, government securities, bonds, time deposits and shares of stocks. (continued)

Status pendanaan imbalan kerja per 31 Desember 2024, 2023 dan 2022 disajikan sebagai berikut: (lanjutan)

Funding status of employee benefit as of December 31, 2024, 2023 and 2022 are as follow: (continued)

	31 Desember/*December 31,* 2022			
	Program Pensiun/ *Pension Plan*	**Program Kesejahteraan/ *Welfare Benefits***	**Total**	
Nilai wajar aset dana (tidak diaudit)	2.118.844	1.030.736	3.149.580	*Fair value of plan assets (unaudited)*
Nilai kini liabilitas manfaat pasti yang didanai	(2.226.053)	(964.038)	(3.190.091)	*Present value of funded defined benefit obligation*
Selisih lebih (kurang) pendanaan	(107.209)	66.698	(40.511)	*Funding surplus (deficit)*
Selisih lebih pendanaan yang tidak diakui	-	(66.698)	(66.698)	*Asset adjustment*
Kewajiban - neto	**(107.209)**	**-**	**(107.209)**	***Liabilities - net***

Per tanggal 31 Desember 2024, 2023 dan 2022, tidak ada selisih lebih aset kesejahteraan yang diakui di laporan posisi keuangan karena ketentuan untuk pengakuan aset dari selisih lebih pendanaan yang disyaratkan dalam standar akuntansi tidak terpenuhi.

As of December 31, 2024, 2023 and 2022, there were no recognition of surplus of Welfare Benefits Plan assets in the statement of financial position as the funding surplus did not meet the recognition criteria of assets under the accounting standards.

g. Sensitivitas dari kewajiban imbalan kerja (tidak diaudit) terhadap perubahan asumsi aktuaria sebagai berikut:

g. The sensitivity of employee benefit liability (unaudited) to the changes in actuarial assumptions is as follow:

	31 Desember/ *December 31,* 2024	**31 Desember/ *December 31,* 2023**	**31 Desember/ *December 31,* 2022**	
Tingkat diskonto				***Discount rate:***
Kenaikan 1%	(367.005)	(360.599)	(363.644)	*Increase 1%*
Penurunan 1%	431.519	425.590	431.961	*Decrease 1%*
Tingkat kenaikan gaji				***Salary increase rate:***
Kenaikan 1%	220.317	237.562	221.622	*Increase 1%*
Penurunan 1%	(192.164)	(163.484)	(191.781)	*Decrease 1%*

h. Analisis jatuh tempo yang diharapkan dari manfaat pensiun yang tidak terdiskonto adalah sebagai berikut: (tidak diaudit)

h. Expected maturity analysis of undiscounted pension benefit is as follows: (unaudited)

	31 Desember/*December 31,* 2024			
	Program Pensiun/ *Pension Plan*	**Program Lainnya/ *Other Benefits***	**Total**	
Sampai dengan 1 tahun	214.409	353.126	567.535	*Up to 1 year*
1 sampai 5 tahun	941.945	996.234	1.938.179	*Between 1 to 5 years*
5 sampai 10 tahun	1.041.501	882.712	1.924.213	*Between 5 to 10 years*
Total	**2.197.855**	**2.232.072**	**4.429.927**	***Total***

41. IMBALAN KERJA (lanjutan) / *41. EMPLOYEE BENEFITS (continued)*

h. Analisis jatuh tempo yang diharapkan dari manfaat pensiun yang tidak terdiskonto adalah sebagai berikut: (tidak diaudit) (lanjutan)

h. Expected maturity analysis of undiscounted pension benefit is as follows: (unaudited) (continued)

	31 Desember/*December 31,* 2023			
	Program Pensiun/ *Pension Plan*	**Program Lainnya/ *Other Benefits***	**Total**	
Sampai dengan 1 tahun	176.478	256.396	432.874	*Up to 1 year*
1 sampai 5 tahun	878.676	1.046.050	1.924.726	*Between 1 to 5 years*
5 sampai 10 tahun	1.027.144	848.474	1.875.618	*Between 5 to 10 years*
Total	**2.082.298**	**2.150.920**	**4.233.218**	***Total***

	31 Desember/*December 31,* 2022			
	Program Pensiun/ *Pension Plan*	**Program Lainnya/ *Other Benefits***	**Total**	
Sampai dengan 1 tahun	127.654	278.591	406.245	*Up to 1 year*
1 sampai 5 tahun	835.385	978.527	1.813.912	*Between 1 to 5 years*
5 sampai 10 tahun	1.064.334	641.241	1.705.575	*Between 5 to 10 years*
Total	**2.027.373**	**1.898.359**	**3.925.732**	***Total***

Rata-rata durasi tertimbang kewajiban imbalan pasti adalah sebagai berikut:

The average duration of the defined benefit obligations are as follow:

	31 Desember/ *December 31,* 2024	**31 Desember/ *December 31,* 2023**	**31 Desember/ *December 31,* 2022**	
Pensiun	8,81 tahun/years	10,09 tahun/years	10,05 tahun/years	*Pension*
Kesejahteraan	9,75 tahun/years	9,82 tahun/years	9,50 tahun/years	*Welfare benefit*
Program lainnya				*Other programs:*
Pesangon	7,29 tahun/years	10,28 tahun/years	7,49 tahun/years	*Post employment benefit*
Masa persiapan pensiun	7,29 tahun/years	10,28 tahun/years	7,67 tahun/years	*Pre-retirement benefit*
Imbalan jangka panjang lainnya	7,29 tahun/years	10,28 tahun/years	7,49 tahun/years	*Other long term benefit*

i. Risiko

Bank tereskpos beberapa risiko atas program imbalan kerja antara lain:

- Risiko yang terekspos pada program iuran pasti adalah hasil investasi dibawah tingkat diskonto. Akumulasi iuran aktual lebih kecil dari nilai yang diasumsikan sehingga mengakibatkan selisih pembayaran terhadap Undang-Undang Ketenagakerjaan akan meningkat dan berdampak pada beban dan liabilitas yang akan meningkat pula.

- Risiko yang terekspos pada program manfaat pasti adalah adanya tingkat hasil investasi dibawah asumsi *discount rate* dan kenaikan gaji aktual yang lebih besar dari asumsi. Hal tersebut menimbulkan peningkatan iuran yang dibayarkan kepada Dana Pensiun.

i. Risk

The Bank is exposed to a number of risks through its employee benefit plans as follows:

- *The exposed risks in defined contribution plan is lower return on investment compared to assumption on discount rate. The accumulated actual contribution to be lower than its assumption resulted increase the difference in the amount of contribution based on Labor Law, and will also increase the amount of the related expenses and liabilities.*

- *The exposed risks in defined benefit pension plan is the lower return on investment compared to assumption on discount rate and the increase in the actual salary is higher than its assumption. These will cause an increase in contribution paid to Pension Fund.*

42. PELAPORAN SEGMEN / *42. SEGMENT REPORTING*

Informasi segmen usaha berdasarkan jenis usaha adalah sebagai berikut:

Segment information based on business type are as follows:

	31 Desember/*December 31*, 2024				
	Konvensional/ *Conventional*	**Syariah/ *Sharia***	**Eliminasi/ *Elimination***	**Total**	
Pendapatan segmen	25.472.625	4.068.967	-	29.541.592	*Segment income*
Beban segmen	(16.113.935)	(1.935.005)	-	(18.048.940)	*Segment expenses*
Pendapatan segmen - neto	9.358.690	2.133.962	-	11.492.652	*Segment Income - net*
Pendapatan operasional lainnya	4.760.640	151.115	(335.836)	4.575.919	*Other operating income*
Penyisihan kerugian penurunan nilai aset keuangan dan non-aset keuangan	(1.853.801)	(127.694)	-	(1.981.495)	*Provision for impairment losses on financial assets and non-financial assets*
Pembalikkan penyisihan estimasi kerugian komitmen dan kontijensi bersih	195		-	195	*Reversal for allowance for estimated losses from commitment & contingencies*
Beban operasional lainnya	(9.313.293)	(1.285.101)	335.836	(10.262.558)	*Other operating expenses*
Laba operasional	2.952.431	872.282	-	3.824.713	*Income from operations*
Pendapatan (beban) bukan operasional - neto	(51.993)	121	-	(51.872)	*Non-operating income (expenses) - net*
Beban pajak	(765.513)	-	-	(765.513)	*Tax expense*
Laba tahun berjalan	**2.134.925**	**872.403**	**-**	**3.007.328**	***Income for the year***
Total aset	**416.184.631**	**60.560.957**	**(7.131.086)**	**469.614.502**	***Total assets***
Total liabilitas dan dana syirkah temporer	**384.480.961**	**59.692.738**	**(7.131.086)**	**437.042.613**	***Total liabilities and temporary syirkah fund***

	31 Desember/*December 31*, 2023				
	Konvensional/ *Conventional*	**Syariah/ *Sharia***	**Eliminasi/ *Elimination***	**Total**	
Pendapatan segmen	24.722.529	3.558.723	-	28.281.252	*Segment income*
Beban segmen	(13.406.425)	(1.444.537)	-	(14.850.962)	*Segment expenses*
Pendapatan segmen - neto	11.316.104	2.114.186	-	13.430.290	*Segment Income - net*
Pendapatan operasional lainnya	4.161.842	154.971	(425.666)	3.891.147	*Other operating income*
Penyisihan kerugian penurunan nilai aset keuangan dan non-aset keuangan	(3.653.668)	(111.729)	-	(3.765.397)	*Provision for impairment losses on financial assets and non-financial assets*
Pembalikkan penyisihan estimasi kerugian komitmen dan kontijensi bersih	1.139	-	-	1.139	*Reversal for allowance for estimated losses from commitment & contingencies*
Beban operasional lainnya	(7.988.114)	(1.455.002)	425.666	(9.017.450)	*Other operating expenses*
Laba operasional	3.837.303	702.426	-	4.539.729	*Income from operations*
Pendapatan (beban) bukan operasional - neto	(159.428)	(91)	-	(159.519)	*Non-operating income (expenses) - net*
Beban pajak				(879.222)	*Tax expense*
Laba tahun berjalan				**3.500.988**	***Income for the year***
Total aset	**392.854.285**	**54.288.709**	**(8.393.258)**	**438.749.736**	***Total assets***
Total liabilitas dan dana syirkah temporer	**363.082.327**	**53.581.515**	**(8.393.258)**	**408.270.584**	***Total liabilities and temporary syirkah fund***

42. PELAPORAN SEGMEN (lanjutan)

Informasi segmen usaha berdasarkan jenis usaha adalah sebagai berikut: (lanjutan)

42. SEGMENT REPORTING (continued)

Segment information based on business type are as follows: (continued)

	31 Desember/*December 31*, 2022				
	Konvensional/ *Conventional*	**Syariah/ *Sharia***	**Eliminasi/ *Elimination***	**Total**	
Pendapatan segmen	23.233.200	2.674.168	-	25.907.368	*Segment income*
Beban segmen	(10.036.723)	(873.361)	-	(10.910.084)	*Segment expenses*
Pendapatan segmen - neto	13.196.477	1.800.807	-	14.997.284	*Segment Income - net*
Pendapatan operasional lainnya	2.405.171	78.845	(209.164)	2.274.852	*Other operating income*
Penyisihan kerugian penurunan nilai aset keuangan dan non-aset keuangan	(3.414.717)	(602.661)	-	(4.017.378)	*Provision for impairment losses on financial assets and non-financial assets*
Pembalikkan penyisihan estimasi kerugian komitmen dan kontijensi bersih	(1.074)	-	-	(1.074)	*Reversal for allowance for estimated losses from commitment & contingencies*
Beban operasional lainnya	(8.704.656)	(943.389)	209.164	(9.438.881)	*Other operating expenses*
Laba operasional	3.481.201	333.602	-	3.814.803	*Income from operations*
Pendapatan (beban) bukan operasional - neto	60.912	(25)	-	60.887	*Non-operating income (expenses) - net*
Beban pajak				(830.617)	*Tax expense*
Laba tahun berjalan				**3.045.073**	***Income for the year***
Total aset	**364.284.663**	**45.335.575**	**(7.471.926)**	**402.148.312**	***Total assets***
Total liabilitas dan dana syirkah temporer	**338.723.316**	**44.987.568**	**(7.471.926)**	**376.238.958**	***Total liabilities and temporary syirkah fund***

43. JAMINAN PEMERINTAH TERHADAP KEWAJIBAN PEMBAYARAN BANK UMUM

Berdasarkan Keputusan Presiden Republik Indonesia No. 15 tahun 2004 tentang pengakhiran tugas dan pembubaran BPPN, dinyatakan dalam pasal 8 bahwa dengan diakhirinya tugas dan dibubarkannya BPPN, Program Penjaminan Pemerintah terhadap kewajiban pembayaran bank umum yang semula dilakukan oleh BPPN berdasarkan Keputusan Presiden Republik Indonesia No. 26 tahun 1998 dan Keputusan Presiden Republik Indonesia No. 27 tahun 1998, selanjutnya dilaksanakan oleh Menteri Keuangan melalui Unit Pelaksanaan Penjaminan Pemerintah (UP3) sebagaimana diatur oleh Keputusan Presiden Republik Indonesia No. 17 tahun 2004, yang diatur lebih lanjut dengan Keputusan Menteri Keuangan No. 84/KMK.06/2004 tanggal 27 Februari 2004 tentang Perubahan atas Keputusan Menteri Keuangan Republik Indonesia No.179/KMK.017/2000 tentang Syarat, Tata cara dan Ketentuan Pelaksanaan Jaminan Pemerintah terhadap Kewajiban Pembayaran Bank Umum.

43. GOVERNMENT GUARANTEES ON THE OBLIGATIONS OF COMMERCIAL BANKS

Based on Decision No. 15 year 2004 of the President of the Republic of Indonesia regarding the termination of the role and winding-up of IBRA, stated on article 8 that in relation with the task completion and dismissal of IBRA, the Government Guarantee Program on the obligations of domestic banks which was originally handled by IBRA based on the Decisions of the President of the Republic of Indonesia No. 26 year 1998 and No. 27 year 1998 would be handled by the Ministry of Finance, specifically by the Government Guarantee Implementation Unit Pelaksanaan Penjaminan Pemerintah (UP3) as provided in the Decision of the President of the Republic of Indonesia No. 17 year 2004, which was further regulated by the Decision No. 84/KMK.06/2004 dated February 27, 2004 of the Ministry of Finance regarding the Amendment of Decision No. 179/KMK.017/2000 of the Ministry of Finance on the Terms, Implementation Guidelines, and Conditions of the Government Guarantees on the obligations of commercial banks.

43. JAMINAN PEMERINTAH TERHADAP KEWAJIBAN PEMBAYARAN BANK UMUM (lanjutan)

Program Penjaminan Pemerintah melalui UP3 telah berakhir pada tanggal 22 September 2005, sebagaimana dinyatakan dalam Peraturan Menteri Keuangan Republik Indonesia No. 68/PMK.05/2005 tanggal 10 Agustus 2005 tentang Perhitungan Dan Pembayaran Premi Program Penjaminan Terhadap Pembayaran Bank Umum untuk periode 1 Juli sampai 21 September 2005. Sebagai pengganti UP3 Pemerintah telah membentuk Lembaga Independen, yaitu Lembaga Penjamin Simpanan (LPS) berdasarkan Undang-undang Republik Indonesia No. 24 tahun 2004 tanggal 22 September 2004 tentang Lembaga Penjamin Simpanan dimana LPS menjamin dana masyarakat termasuk dana dari bank lain dalam bentuk giro, deposito, sertifikat deposito, tabungan dan/atau bentuk lainnya yang dipersamakan dengan itu.

Berdasarkan salinan Peraturan LPS No. 1/PLPS/2006 tanggal 9 Maret 2006 tentang "Program Penjaminan Simpanan" diatur besarnya saldo yang dijamin untuk setiap nasabah pada satu bank adalah paling tinggi sebesar Rp100 juta.

Sesuai dengan Peraturan Pemerintah No. 66 Tahun 2008 tanggal 13 Oktober 2008 tentang "Besaran Nilai Simpanan yang Dijamin Lembaga Penjamin Simpanan" maka nilai simpanan setiap nasabah pada satu bank yang dijamin oleh Pemerintah naik menjadi sebesar Rp2 miliar dari semula Rp100 juta, efektif sejak tanggal tersebut di atas.

Suku bunga penjaminan LPS pada tanggal 31 Desember 2024, 2023 dan 2022 masing-masing adalah sebesar 4,25%, 4,25% dan 3,75% untuk simpanan dalam mata uang Rupiah, dan masing-masing sebesar 2,25%, 2,25% dan 1,75% untuk simpanan dalam mata uang asing.

Pada tanggal 31 Desember 2024, 2023 dan 2022, Bank telah membayar premi program penjaminan masing-masing sebesar Rp729.685, Rp656.774 dan Rp599.991.

43. GOVERNMENT GUARANTEES ON THE OBLIGATIONS OF COMMERCIAL BANKS (continued)

The Guarantee Program by the Government through UP3 ended on September 22, 2005, as stated in Regulation No. 68/PMK.05/2005 dated August 10, 2005 of the Ministry of Finance concerning the Calculation and Payments of Premium on Guarantee Program from Commercial Banks for the period July 1 to September 21, 2005. The Government established the Deposit Insurance Corporation (LPS), an independent agency, to replace UP3, based on Law No. 24 year 2004 dated September 22, 2004 of the Republic of Indonesia regarding the establishment309 Deposit Insurance Corporation (LPS) to guarantee public funds including funds from other banks in the form of demand deposits, time deposits, certificates of deposit, savings deposits and/or other equivalent form.

Based on LPS regulation No. 1/PLPS/2006 dated March 9, 2006 regarding "Government Guarantee Program on Saving Account", the balance of saving accounts guaranteed for each customer is at a maximum of Rp100 million.

In accordance with Government Regulation No. 66 of 2008, dated October 13, 2008 regarding "The Amount of Public Savings Guaranteed by the Indonesia Deposit Insurance Corporation", the total amount of customers' saving accounts in banks which is guaranteed by the Government has increased to Rp2 billion, from the previous Rp100 million, effective on the date stated above.

LPS interest rates guarantee as of December 31,2024, 2023 and 2022 were 4.25%, 4.25% and 3.75% for each deposits in Rupiah and 2.25%, 2.25% and 1.75% for deposits in foreign currencies.

The Bank paid a premium on the guarantee program amounting to Rp729,685, Rp656,774 and Rp599,991 as of December 31, 2024, 2023 and 2022, respectively.

44. TRANSAKSI DENGAN PIHAK-PIHAK BERELASI

Dalam kegiatan normal usaha, Bank melakukan transaksi dengan pihak berelasi karena hubungan kepemilikan dan/atau kepengurusan. Semua transaksi dengan pihak-pihak berelasi telah dilakukan dengan kebijakan dan syarat yang telah disepakati bersama.

Tabel di bawah menunjukkan rincian pihak-pihak berelasi dengan Bank beserta sifat dari transaksi yang dilakukan oleh Bank tersebut pada tahun 31 Desember 2024, 2023 dan 2022:

44. TRANSACTIONS WITH RELATED PARTIES

In the normal course of business, the Bank enters into certain transactions with parties which are related to the management and/or owned by the same ultimate shareholder. All transactions with related parties have been entered into the agreed terms and conditions.

The table below details the related parties of the Bank along with the nature of transactions entered into by the Bank during December 31, 2024, 2023 and 2022:

Pihak-pihak berelasi/ ***Related parties***	**Jenis hubungan/** ***Type of relationship***	**Unsur transaksi pihak berelasi/** ***Nature of related party transactions***
Pemerintah Republik Indonesia (RI)	Pemegang saham mayoritas melalui Kementerian Keuangan RI/ *Majority shareholder through the Ministry of Finance of the Republic of Indonesia*	Obligasi Pemerintah, Kredit yang diberikan dan pembiayaan/piutang syariah/ *Government Bonds, Loans and sharia financing/receivables*
PT Bank Mandiri (Persero) Tbk	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Giro pada bank lain, Penempatan pada Bank Indonesia dan Bank Lain, Efek-efek, Liabilitas Akseptasi, Pinjaman yang diterima dan Surat Berharga yang Diterbitkan/*Current accounts with other banks, Placement with Bank Indonesia and Other Banks, Securities, Acceptances Payable, Fund Borrowing and Securities issued*
PT Bank Negara Indonesia (Persero) Tbk	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Giro pada bank lain, Penempatan pada Bank Indonesia dan Bank Lain, Efek-efek, Surat Berharga yang Diterbitkan, Liabilitas Akseptasi/ *Current accounts with other banks, Placement with Bank Indonesia and Other Banks, Securities and Securities issued, Acceptances Payable*
PT Bank Rakyat Indonesia (Persero) Tbk	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Giro pada bank lain, Penempatan pada Bank Indonesia dan Bank Lain, Efek-efek, dan Surat Berharga yang Diterbitkan/ *Current accounts with other banks, Placement with Bank Indonesia and Other Banks, Securities and Securities issued*
PT Bank Syariah Indonesia Tbk	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Giro pada bank lain, dan Penempatan pada Bank Indonesia dan Bank Lain/ *Current accounts with other banks, and Placement with Bank Indonesia and Other Banks*
PT Bank Mandiri Taspen	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Penempatan pada Bank Indonesia dan Bank Lain, Efek-efek/*Placement with Bank Indonesia and Other Banks and Securities*
PT Bank Raya Tbk (dahulu PT Bank Rakyat Indonesia Agroniaga Tbk)	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Penempatan pada Bank Indonesia dan Bank Lain, Simpanan dari Bank Lain dan Surat Berharga yang Diterbitkan/ *Placement with Bank Indonesia and Other Banks, Deposits from Other Banks, Securities issued*
Lembaga Pembiayaan Ekspor Indonesia	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Penempatan pada Bank Indonesia dan Bank Lain, Efek-efek/*Placement with Bank Indonesia and Other Banks, Securities*

44. TRANSAKSI DENGAN PIHAK-PIHAK BERELASI (lanjutan)

Tabel di bawah menunjukkan rincian pihak-pihak berelasi dengan Bank beserta sifat dari transaksi yang dilakukan oleh Bank tersebut pada tahun 31 Desember 2024, 2023 dan 2022 (lanjutan):

44. TRANSACTIONS WITH RELATED PARTIES (continued)

The table below details the related parties of the Bank along with the nature of transactions entered into by the Bank during December 31, 2024, 2023 and 2022 (continued):

Pihak-pihak berelasi/ ***Related parties***	**Jenis hubungan/** ***Type of relationship***	**Unsur transaksi pihak berelasi/** ***Nature of related party transactions***
PT Hutama Karya (Persero)	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Kredit yang diberikan dan pembiayaan/piutang syariah, Tagihan Akseptasi/*Loans and sharia financing/receivables, Acceptance Receivable*
Perum Perumnas	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Efek-efek, dan Kredit yang diberikan dan pembiayaan/piutang syariah/*Securities, and Loans and sharia financing/receivables*
PT PP Properti Tbk	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Tagihan Akseptasi dan Kredit yang diberikan dan pembiayaan/piutang syariah/*Acceptances Receivable and Loans and sharia financing/receivables*
PT Wijaya Karya Bangunan Gedung Tbk	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Tagihan Akseptasi dan Garansi yang diterbitkan/*Acceptances Receivable and Guarantees issued*
PT Wijaya Karya Industri Energi	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Tagihan Akseptasi/*Acceptances Receivable*
PT Wijaya Karya Industri & Konstruksi	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Tagihan Akseptasi/*Acceptances Receivable*
Perum Percetakan Negara Republik Indonesia (Perum PNRI)	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Kredit yang diberikan dan pembiayaan/piutang syariah/*Loans and sharia financing/receivables*
PT Danareksa Investment Management	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Efek-Efek dan Surat Berharga yang Diterbitkan/*Securities and Securities Issued*
PT Adhi Karya (Persero) Tbk	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Kredit yang diberikan dan pembiayaan/piutang syariah/*Loans and sharia financing/receivables*
PT Angkasa Pura II (Persero)	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Kredit yang diberikan dan pembiayaan/piutang syariah/*Loans and sharia financing/receivables*
PT Dok Dan Perkapalan Surabaya (Persero)	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Kredit yang diberikan dan pembiayaan/piutang syariah/*Loans and sharia financing/receivables*
PT HK Realtindo	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Kredit yang diberikan dan pembiayaan/piutang syariah/*Loans and sharia financing/receivables*

44. TRANSAKSI DENGAN PIHAK-PIHAK BERELASI (lanjutan)

Tabel di bawah menunjukkan rincian pihak-pihak berelasi dengan Bank beserta sifat dari transaksi yang dilakukan oleh Bank tersebut pada tahun 31 Desember 2024, 2023 dan 2022 (lanjutan):

44. TRANSACTIONS WITH RELATED PARTIES (continued)

The table below details the related parties of the Bank along with the nature of transactions entered into by the Bank during December 31, 2024, 2023 and 2022 (continued):

Pihak-pihak berelasi/ ***Related parties***	**Jenis hubungan/** ***Type of relationship***	**Unsur transaksi pihak berelasi/** ***Nature of related party transactions***
PT Indah Karya (Persero)	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Kredit yang diberikan dan pembiayaan/piutang syariah/*Loans and sharia financing/receivables*
PT Jasamarga Bali Tol	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ Subsidiary of State Owned Enterprise (SOE)	Kredit yang diberikan dan pembiayaan/piutang syariah/*Loans and sharia financing/receivables*
PT Mandiri Manajemen Investasi	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Efek-Efek dan Surat Berharga yang Diterbitkan/*Securities and Securities issued*
PT Patra Jasa	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Kredit yang diberikan dan pembiayaan/piutang syariah/*Loans and sharia financing/receivables*
PT Permodalan Nasional Madani	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Efek-Efek, Kredit yang diberikan dan pembiayaan/piutang syariah/*Securities, Loans and sharia financing/receivables*
PT Amarta Karya (Persero)	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Kredit yang diberikan dan pembiayaan/piutang syariah/*Loans and sharia financing/receivables*
PT Perusahaan Pengelola Aset (Persero)	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Efek-Efek dan Kredit yang diberikan dan pembiayaan/piutang syariah/Securities and *Loans and sharia financing/receivables*
PT Taspen (Persero)	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Surat Berharga yang Diterbitkan/ *Securities issued*
PT Virama Karya (Persero)	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Kredit yang diberikan dan pembiayaan/piutang syariah dan Garansi yang diterbitkan/*Loans and sharia finacing/receivables and Guarantees issued*
PT Waskita Bumi Wira	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Kredit yang diberikan dan pembiayaan/piutang syariah/*Loans and sharia financing/receivables*
PT Waskita Karya Realty	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Kredit yang diberikan dan pembiayaan/piutang Syariah/ *Loans and sharia financing/receivables*
PT PPA Finance	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Kredit yang diberikan dan pembiayaan/piutang syariah/*Loans and sharia financing/receivables*
PT Waskita FIM Perkasa Realti	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Kredit yang diberikan dan pembiayaan/piutang syariah/*Loans and sharia financing/receivables*

44. TRANSAKSI DENGAN PIHAK-PIHAK BERELASI (lanjutan)

Tabel di bawah menunjukkan rincian pihak-pihak berelasi dengan Bank beserta sifat dari transaksi yang dilakukan oleh Bank tersebut pada tahun 31 Desember 2024, 2023 dan 2022 (lanjutan):

44. TRANSACTIONS WITH RELATED PARTIES (continued)

The table below details the related parties of the Bank along with the nature of transactions entered into by the Bank during December 31, 2024, 2023 and 2022 (continued):

Pihak-pihak berelasi/ ***Related parties***	**Jenis hubungan/** ***Type of relationship***	**Unsur transaksi pihak berelasi/** ***Nature of related party transactions***
PT Pertamina (persero)	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Kredit yang diberikan dan pembiayaan/piutang syariah dan efek-efek/ *Loans and sharia financing/receivables and Securities*
PT Yodya Karya (Persero)	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Kredit yang diberikan dan pembiayaan/piutang syariah dan Garansi yang diterbitkan/*Loans and sharia financing/receivables and Guarantees issued*
PT Adhi Persada Properti	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Kredit yang diberikan dan pembiayaan/piutang syariah/*Loans and sharia financing/receivables*
PT Perumnas Jakabaring	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Kredit yang diberikan dan pembiayaan/piutang syariah/Loans and sharia financing/receivables
PT Perumnas Sentraland	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprice (SOE)*	Kredit yang diberikan dan pembiayaan/piutang syariah/*Loans and sharia financing/receivables*
PT Perumnas TOD Tanjung	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Kredit yang diberikan dan pembiayaan/piutang syariah/*Loans and sharia financing/receivables*
PT Sinergi Investasi Properti	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Kredit yang diberikan dan pembiayaan/piutang syariah/*Loans and sharia financing/receivables*
PT Perumnas Pondok Cina	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Kredit yang diberikan dan pembiayaan/piutang syariah/*Loans and sharia financing/receivables*
PT Adhi Commuter Properti	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Kredit yang diberikan dan pembiayaan/piutang syariah dan Tagihan Lain-Lain/*Loans and sharia financing/receivables and Other receivables*
PT Angkasa Pura I (Persero)	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Kredit yang diberikan dan pembiayaan/piutang syariah dan efek-efek/*Loans and sharia financing/receivables and securities* Efek-efek/*Securities* Penyisihan kerugian penurunan nilai aset keuangan dan aset non keuangan/*Provision for impairment losses on financial and non-financial assets*
PT Jalin Pembayaran Nusantara	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Kredit yang diberikan dan pembiayaan/piutang syariah/*Loans and sharia financing/receivables*

44. TRANSAKSI DENGAN PIHAK-PIHAK BERELASI (lanjutan)

Tabel di bawah menunjukkan rincian pihak-pihak berelasi dengan Bank beserta sifat dari transaksi yang dilakukan oleh Bank tersebut pada tahun 31 Desember 2024, 2023 dan 2022 (lanjutan):

44. TRANSACTIONS WITH RELATED PARTIES (continued)

The table below details the related parties of the Bank along with the nature of transactions entered into by the Bank during December 31, 2024, 2023 and 2022 (continued):

Pihak-pihak berelasi/ ***Related parties***	**Jenis hubungan/** ***Type of relationship***	**Unsur transaksi pihak berelasi/** ***Nature of related party transactions***
PT Reasuransi Nasional Indonesia	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Surat Berharga yang Diterbitkan / *Securities issued*
PT Tugu Reasuransi Indonesia	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Surat Berharga yang Diterbitkan/ *Securities issued*
PT Puspetindo	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Kredit yang diberikan dan pembiayaan/piutang syariah/*Loans and sharia financing/receivables*
PT Asuransi Kredit Indonesia	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Surat Berharga yang Diterbitkan dan Garansi yang diterbitkan/*Securities Issued and Guarantees issued*
PT Asuransi Jasa Indonesia	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Surat Berharga yang Diterbitkan/ *Securities issued*
PT Asuransi Jasa Raharja	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Surat Berharga yang Diterbitkan/ *Securities issued*
PT Perusahaan Listrik Negara (Persero)	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Kredit yang diberikan dan Efek-efek/ *Loans and sharia financing/receivables and Securities*
PT Nindya Karya (Persero)	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Kredit yang diberikan dan Garansi yang diterbitkan/*Loans and sharia financing/receivables and Guarantees issued*
PT Centurion Perkasa Iman	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Kredit yang diberikan dan Garansi yang diterbitkan/*Loans and sharia financing/receivables and Guarantees issued*
PT Energi Pelabuhan Indonesia	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Garansi yang diterbitkan/ *Guarantees issued*
Perum Jaminan Kredit Indonesia	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Surat Berharga yang Diterbitkan/ *Securities issued*
PT Daya Mitra Telekomunikasi	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Efek-efek/ *Securities*
PT Industri Kereta Api	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ Subsidiary of State Owned Enterprise (SOE)	Kredit yang diberikan dan pembiayaan/piutang Syariah /Loans and sharia financing/receivables

44. TRANSAKSI DENGAN PIHAK-PIHAK BERELASI (lanjutan)

Tabel di bawah menunjukkan rincian pihak-pihak berelasi dengan Bank beserta sifat dari transaksi yang dilakukan oleh Bank tersebut pada tahun 31 Desember 2024, 2023 dan 2022 (lanjutan):

44. TRANSACTIONS WITH RELATED PARTIES (continued)

The table below details the related parties of the Bank along with the nature of transactions entered into by the Bank during December 31, 2024, 2023 and 2022 (continued):

Pihak-pihak berelasi/ ***Related parties***	**Jenis hubungan/** ***Type of relationship***	**Unsur transaksi pihak berelasi/** ***Nature of related party transactions***
PT AXA Mandiri Financial Services	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Surat Berharga yang Diterbitkan/ *Securities issued*
PT Penjaminan Infrastruktur Indonesia (Persero)	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Surat Berharga yang Diterbitkan/ *Securities issued*
PT Reasuransi Indonesia Utama (Persero)	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Surat Berharga yang Diterbitkan/ *Securities issued*
PT Tugu Pratama Indonesia	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Surat Berharga yang Diterbitkan/ *Securities issued*
PT Sarana Multigriya Finance (Persero)	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Efek - Efek, Pinjaman yang diterima dan Pinjaman Subordinasi dan efek-efek subordinasi/ *Securities*, *Fund borrowings and Subordinated Loan and securities*
PT Sinergi Colomadu	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Kredit yang diberikan dan pembiayaan/piutang syariah/*Loans and sharia financing/receivables*
PT Perusahaan Gas Negara (Persero) Tbk	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Efek-Efek/*Securities*
PT Pelabuhan Indonesia II (Persero)	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Efek - Efek/*Securities*
PT PP Properti Jababeka Residence	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ Subsidiary of State Owned Enterprise (SOE)	Kredit yang diberikan dan pembiayaan/piutang syariah/*Loans and sharia financing/receivables*
PT Bahana Pembinaan Usaha Indonesia (Persero)	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Efek - Efek/*Securities* Pendapatan dari penerimaan kredit yang dihapus bukukan/*Income from recovery of loans written off*

44. TRANSAKSI DENGAN PIHAK-PIHAK BERELASI (lanjutan)

Tabel di bawah menunjukkan rincian pihak-pihak berelasi dengan Bank beserta sifat dari transaksi yang dilakukan oleh Bank tersebut pada tahun 31 Desember 2024, 2023 dan 2022 (lanjutan):

44. TRANSACTIONS WITH RELATED PARTIES (continued)

The table below details the related parties of the Bank along with the nature of transactions entered into by the Bank during December 31, 2024, 2023 and 2022 (continued):

Pihak-pihak berelasi/ ***Related parties***	**Jenis hubungan/** ***Type of relationship***	**Unsur transaksi pihak berelasi/** ***Nature of related party transactions***
PT Pegadaian	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Efek-Efek/*Securities*
PT BNI Asset Management	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Surat Berharga yang Diterbitkan dan efek-efek/ *Securities issued and securities*
PT Waskita Karya (Persero) Tbk	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Efek-efek/ *Securities*
Peruri Properti	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Kredit yang diberikan dan pembiayaan/piutang syariah dan Garansi yang diterbitkan/*Loans and sharia financing/receivables and Guarantees issued*
PT Waskita Beton Precast Tbk	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Efek-efek/ *Securities*
PT BRI Manajemen Investasi	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Efek-efek/ *Securities*
PT Pos Indonesia (Persero)	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Garansi yang diterbitkan/ *Guarantees issued*
PT Telkom Satelit Indonesia	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Garansi yang diterbitkan/ *Guarantees issued*
PT Inhutani V	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ Subsidiary of State Owned Enterprise (SOE)	Kredit yang diberikan dan pembiayaan/piutang syariah/*Loans and sharia financing/receivables*
Badan Pengelola Tabungan Perumahan Rakyat	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Pinjaman dan Efek-Efek Subordinasi/ *Subordinated Loan and Securities*

44. TRANSAKSI DENGAN PIHAK-PIHAK BERELASI (lanjutan)

Tabel di bawah menunjukkan rincian pihak-pihak berelasi dengan Bank beserta sifat dari transaksi yang dilakukan oleh Bank tersebut pada tahun 31 Desember 2024, 2023 dan 2022 (lanjutan):

44. TRANSACTIONS WITH RELATED PARTIES (continued)

The table below details the related parties of the Bank along with the nature of transactions entered into by the Bank during December 31, 2024, 2023 and 2022 (continued):

Pihak-pihak berelasi/ ***Related parties***	**Jenis hubungan/** ***Type of relationship***	**Unsur transaksi pihak berelasi/** ***Nature of related party transactions***
PT PP Urban	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Garansi yang diterbitkan, Tagihan lain-lain, Kredit yang diberikan dan pembiayaan/piutang syariah / *Guarantees issued, Other receivables, Loans and sharia financing/receivables*
PT Aviasi Pariwisata Indonesia (Persero)	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Efek-efek dan Kredit yang diberikan dan pembiayaan/piutang syariah/*Securities and Loans and sharia financing/receivables*
PT Bio Farma (Persero)	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Kredit yang diberikan dan pembiayaan/piutang syariah/*Loans and sharia financing/receivables*
PT Inka Multi Solusi Service	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Kredit yang diberikan dan pembiayaan/piutang Syariah dan Tagihan lain-lain/*Loans and sharia financing/receivables and Other receivables*
PT PAL Indonesia (Persero)	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Kredit yang diberikan dan pembiayaan/piutang syariah dan Garansi yang diterbitkan/Loans and sharia financing/receivables and Guarantees issued
PT Pengembangan Pariwisata Indonesia (Persero)	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Kredit yang diberikan dan pembiayaan/piutang syariah/*Loans and sharia financing/receivables*
Perum Pengangkutan Penumpang Djakarta	Dalam pengendalian yang sama melalui pemerintah pusat RI/ *Under common control through the Central Government of the Republic of Indonesia*	Kredit yang diberikan dan pembiayaan/piutang syariah/*Loans and sharia financing/receivables*
PT Wika Realty	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ *Subsidiary of State Owned Enterprise (SOE)*	Kredit yang diberikan dan pembiayaan/piutang syariah/*Loans and sharia financing/receivables*
PT Wika Gedung	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ Subsidiary of State Owned Enterprise (SOE)	Tagihan lain-lain/*Other receivables*
PT Bahana TCW Investment Management	Entitas Anak dari Badan Usaha Milik Negara (BUMN)/ Subsidiary of State Owned Enterprise (SOE)	Efek-efek/*Securities*
Manajemen Kunci termasuk Direksi, Komisaris, Komite Audit, Kepala Divisi dan Kepala Cabang/*Key Management including Director, Commissioner, Audit Comittee, Head Division and Branch Manager*	Hubungan pengendalian kegiatan perusahaan/ *Control on company's activities*	Kredit yang Diberikan dan Pembiayaan/piutang Syariah, Simpanan dari Nasabah, dan Dana *Syirkah* Temporer/*Loans and sharia financing/receivables, Deposit from Customers and Temporary Syirkah Fund*

44. TRANSAKSI DENGAN PIHAK-PIHAK BERELASI (lanjutan)

a. Transaksi dengan pihak berelasi karena hubungan kepemilikan dengan pemerintah Republik Indonesia:

44. TRANSACTIONS WITH RELATED PARTIES (continued)

a. Transactions with related parties due to ownership relation with government of the Republic of Indonesia:

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Aset				***Assets***
Giro pada bank lain (Catatan 6)	5.065.331	1.049.449	508.322	*Current accounts with other banks (Note 6)*
Penempatan pada Bank Indonesia dan bank lain (Catatan 7)	61	61	61	*Placements with Bank Indonesia and other banks (Note 7)*
Efek-efek (Catatan 8)	5.489.205	3.851.105	850.059	*Securities (Note 8)*
Obligasi pemerintah (Catatan 9)	35.475.529	35.893.929	51.964.973	*Government bonds (Note 9)*
Kredit yang diberikan dan pembiayaan/piutang syariah (Catatan 11)	28.063.700	27.678.581	19.594.018	*Loans and sharia financing/ receivables (Note 11)*
Tagihan akseptasi (Catatan 13)	433.708	68.746	131.356	*Acceptance receivable (Note 13)*
Tagihan lain-lain	612.280	106.385	61.169	*Other Receivables*
Total aset untuk pihak-pihak berelasi	**75.139.814**	**68.648.256**	**73.109.958**	***Total assets to related parties***
Cadangan kerugian penurunan nilai dari pihak-pihak berelasi	(835.954)	(1.227.528)	(900.235)	*Allowance for impairment losses for related parties*
Total dari aset pihak-pihak berelasi - neto	**74.303.860**	**67.420.728**	**72.209.723**	***Total assets from related parties - net***
Persentase total aset pihak berelasi terhadap total aset	**15,82%**	**15,37%**	**17,96%**	***Percentage of total assets from related parties to total assets***

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Liabilitas				***Liabilities***
Simpanan dari nasabah (Catatan 18, 19 dan 20)	215.731.937	196.674.002	173.906.896	*Deposits from customers (Notes 18, 19 and 20)*
Liabilitas Akseptasi (Catatan 23)	690.475	224.045	118.525	*Acceptance payable (Note 23)*
Surat-surat berharga yang diterbitkan (Catatan 24)	4.600.466	5.868.525	4.355.008	*Securities issued (Note 24)*
Pinjaman yang diterima (Catatan 25)	23.352.225	22.453.290	17.455.685	*Fund borrowings (Note 25)*
Efek efek yang dijual dengan janji Dijual kembali (Catatan 22)	963.042	-	-	*Securities sell under agreement to repurchased (Note 22)*
Pinjaman Subordinasi dan efek-efek subordinasi (Catatan 26)	1.500.000	4.499.997	4.499.977	Subordinated loan *and securities (Note 26)*
Total liabilitas untuk pihak-pihak berelasi	**246.838.145**	**229.719.859**	**200.336.091**	***Total liabilities to related parties***
Persentase total liabilitas pihak berelasi terhadap total liabilitas	**60,53%**	**60,27%**	**57,01%**	***Percentage of total liabilities from related parties to total liabilities***

44. TRANSAKSI DENGAN PIHAK-PIHAK BERELASI (lanjutan)

a. Transaksi dengan pihak berelasi karena hubungan kepemilikan dengan pemerintah Republik Indonesia (lanjutan):

44. TRANSACTIONS WITH RELATED PARTIES (continued)

a. Transactions with related parties due to ownership relation with government of the Republic of Indonesia (continued):

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Dana Syirkah Temporer				***Temporary Syirkah Funds***
Giro Mudharabah (Catatan 18)	11.985	11.271	11.897	*Mudharabah current accounts (Note 18)*
Tabungan Mudharabah (Catatan 19)	118.667	133.630	83.465	*Mudharabah savings deposits (Note 19)*
Deposito Mudharabah (Catatan 20)	6.845.833	8.899.072	7.631.970	*Mudharabah time deposits (Note 20)*
Total dana syirkah temporer untuk pihak-pihak berelasi	**6.976.485**	**9.043.973**	**7.727.332**	***Total temporary syirkah funds to related parties***
Persentase total dana syirkah temporer berelasi terhadap dana syirkah temporer	**23,85%**	**33,37%**	**31,08%**	***Percentage of total temporary syirkah funds related parties to total temporary syirkah funds***

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Pendapatan bunga dan bagi hasil				***Interest income and income from profit sharing***
Penempatan pada Bank Indonesia dan bank lain	191.171	490.024	282.311	*Placements with Bank Indonesia and other banks*
Efek-efek	431.876	299.741	216.020	*Securities*
Obligasi pemerintah	1.187.847	1.220.648	1.518.936	*Government bonds*
Kredit yang diberikan dan pembiayaan/piutang syariah	1.875.653	1.195.910	1.081.237	*Loans and sharia financing/ receivables*
Total pendapatan bunga dan bagi hasil dari pihak-pihak berelasi	**3.686.547**	**3.206.323**	**3.098.504**	***Total interest income and income from profit sharing from related parties***
Persentase terhadap total pendapatan bunga dan bagi hasil	**12,48%**	**11,34%**	**11,96%**	***Percentage to total interest income and income from profit sharing***

44. TRANSAKSI DENGAN PIHAK-PIHAK BERELASI (lanjutan)

a. Transaksi dengan pihak berelasi karena hubungan kepemilikan dengan pemerintah Republik Indonesia (lanjutan):

44. TRANSACTIONS WITH RELATED PARTIES (continued)

a. Transactions with related parties due to ownership relation with government of the Republic of Indonesia (continued):

	31 Desember/ *December 31,* 2024	**31 Desember/ *December 31,* 2023**	**31 Desember/ *December 31,* 2022**	
Beban bunga, bagi hasil dan bonus				*Interest, profit sharing and bonus expenses*
Simpanan dari nasabah	5.810.627	3.137.470	2.642.731	*Deposits from customers*
Simpanan dari bank lain	7.515	2.647	781	*Deposits from other banks*
Surat-surat berharga yang diterbitkan	339.212	433.269	455.401	*Securities issued*
Pinjaman yang diterima	1.075.252	965.111	843.147	*Fund borrowings*
Efek- efek yang dijual dengan janji dibeli kembali	19.314	34.593	4.894	*Securities sold under repurchase agreement*
Pinjaman subordinasi dan efek-efek subordinasi	378.786	381.770	381.760	*Subordinated loan and securities*
Giro *Mudharabah*	112	18	181	*Mudharabah current accounts*
Tabungan *Mudharabah*	1.244	1.896	6.521	*Mudharabah savings deposits*
Deposito *Mudharabah*	88.435	149.498	80.613	*Mudharabah time deposits*
Total beban bunga dan bonus dari pihak berelasi	**7.720.497**	**5.106.272**	**4.416.029**	***Total interest and bonus expenses from related parties***
Persentase terhadap total beban bunga, bagi hasil dan bonus	**42,78%**	**34,38%**	**40,48%**	***Percentage to total interest, profit sharing and bonus expense***

	31 Desember/ *December 31,* 2024	**31 Desember/ *December 31,* 2023**	**31 Desember/ *December 31,* 2022**	
Komitmen dan Kontinjensi pada Rekening Administratif (Catatan 28)				*Commitments and Contingencies in Administrative Accounts (Note 28)*
Garansi yang diterbitkan	1.072.600	1.116.581	426.438	*Guarantees issued*
Irrevocable L/C yang masih Berjalan	52.513	8.840	115.445	*Outstanding irrevocable LCs*
Total komitmen dan kontinjensi pada rekening administratif dari pihak berelasi	1.125.113	1.125.421	541.883	*Total commitments and contingencies in administrative accounts*
Presentase terhadap total komitmen dan kontinjensi pada rekening administratif	**35,52%**	**41,28%**	**43,35%**	***Percentage to total commitments and contingencies in administrative accounts***

44. TRANSAKSI DENGAN PIHAK-PIHAK BERELASI (lanjutan)

b. Transaksi dengan manajemen kunci (lanjutan)

44. TRANSACTIONS WITH RELATED PARTIES (continued)

b. Transactions with key management personnel (continued)

	31 Desember/ *December 31,* 2024	**31 Desember/ *December 31,* 2023**	**31 Desember/ *December 31,* 2022**	
Kredit yang diberikan dan piutang/ pembiayaan syariah (Catatan 11)	83.781	94.105	102.781	*Loan and sharia financing/receivables (Note 11)*
Cadangan kerugian penurunan nilai dari pihak-pihak berelasi	(350)	(288)	(374)	*Allowance for impairment losses for related parties*
Total dari aset pihak-pihak berelasi - neto	**83.431**	**93.817**	**102.407**	***Total assets from related parties - net***
Persentase terhadap total aset	**0,02%**	**0,02%**	**0,03%**	***Percentage to total assets***

	31 Desember/ *December 31,* 2024	**31 Desember/ *December 31,* 2023**	**31 Desember/ *December 31,* 2022**	
Liabilitas				***Liabilities***
Simpanan dari nasabah (Catatan 18, 19 dan 20)	60.759	186.924	115.340	*Deposits from customers (Notes 18, 19 and 20)*
Liabilitas imbalan kerja	271.959	288.487	268.476	*Employee benefits liability*
Total liabilitas dari manajemen kunci	332.718	475.411	383.816	*Total liabilities from key management personnel*
Persentase terhadap total liabilitas	**0,08%**	**0,12%**	**0,11%**	***Percentage to total liabilities***

	31 Desember/ *December 31,* 2024	**31 Desember/ *December 31,* 2023**	**31 Desember/ *December 31,* 2022**	
Dana Syirkah Temporer				Temporary Syirkah Funds
Giro Mudharabah (Catatan 18)	-	2.203	-	*Mudharabah current accounts (Note 18)*
Tabungan Mudharabah (Catatan 19)	7.226	8.363	4.962	*Mudharabah savings deposits (Note 19)*
Deposito Mudharabah (Catatan 20)	11.575	9.297	5.221	*Mudharabah time deposits (Note 20)*
Total dana syirkah temporer untuk pihak-pihak berelasi	18.801	19.863	10.183	*Total temporary syirkah funds to related parties*
Persentase total dana syirkah temporer berelasi terhadap dana syirkah temporer	**0,06%**	**0,07%**	**0,04%**	***Percentage of total temporary syirkah funds related parties to total temporary syirkah funds***

	31 Desember/ *December 31,* 2024	**31 Desember/ *December 31,* 2023**	**31 Desember/ *December 31,* 2022**	
Pendapatan bunga dan bagi hasil				*Interest income and income from profit sharing*
Kredit yang diberikan dan pembiayaan/piutang syariah	5.149	6.821	6.929	*Loans and sharia financing/ receivables*
Persentase terhadap total pendapatan bunga dan bagi hasil	**0,02%**	**0,02%**	**0,03%**	***Percentage to total interest income and income from profit sharing***

44. TRANSAKSI DENGAN PIHAK-PIHAK BERELASI (lanjutan)

b. Transaksi dengan manajemen kunci (lanjutan)

44. TRANSACTIONS WITH RELATED PARTIES (continued)

b. Transactions with key management personnel (continued)

	31 Desember/ *December 31,* 2024	**31 Desember/ *December 31,* 2023**	**31 Desember/ *December 31,* 2022**	
Beban bunga, bagi hasil dan bonus				*Interest, profit sharing and bonus expenses*
Simpanan dari nasabah	1.175	1.446	1.564	*Deposits from customers*
Dana Syirkah	287	402	168	*Mudharabah savings deposits*
Total beban bunga, bagi hasil, dan bonus	1.462	1.848	1.732	*Total interest, profit sharing and bonus expense*
Persentase terhadap total beban bunga, bagi hasil, dan bonus	0,01%	0,01%	0,03%	*Percentage to total interest, profit sharing and bonus expense*

	31 Desember/ *December 31,* 2024	**31 Desember/ *December 31,* 2023**	**31 Desember/ *December 31,* 2022**	
Imbalan jangka pendek:				*Short-term employee benefits:*
Direksi (Catatan 1h)	199.832	161.529	131.671	*Board of directors (Note 1h)*
Dewan komisaris (Catatan 1h)	76.260	64.480	51.960	*Board of commissioners (Note 1h)*
Karyawan kunci lain	265.859	216.253	221.825	*Other key employees*
Imbalan pasca kerja:				*Post-employee benefits:*
Karyawan kunci lain	196.004	200.829	182.874	*Other key employees*
Imbalan jangka Panjang lainnya:				*Other long term benefits:*
Karyawan kunci lain	75.955	87.658	85.602	*Other key employees*
Total	**813.910**	**730.749**	**673.932**	***Total***
Persentase terhadap total beban gaji dan tunjangan karyawan	**18,31%**	**18,35%**	**16,08%**	***Percentage to total salaries and employee benefits***

45. MANAJEMEN RISIKO

Risiko Kredit

Risiko Kredit adalah Risiko kerugian akibat kegagalan pihak lain dalam memenuhi kewajibannya. Termasuk dalam Risiko Kredit yaitu Risiko Kredit akibat kegagalan debitur, Risiko Kredit akibat terkonsentrasinya penyediaan dana (Risiko Konsentrasi Kredit), Risiko Kredit akibat kegagalan pihak lawan (*counterparty credit risk*), Risiko Kredit akibat kegagalan settlement (*settlement risk*), dan Risiko Kredit akibat *country risk.*

Risiko Kredit dapat bersumber dari berbagai aktivitas bisnis Bank. Pemberian kredit merupakan sumber Risiko Kredit yang terbesar. Selain kredit, Bank menghadapi Risiko Kredit dari berbagai instrumen keuangan seperti surat berharga, akseptasi, transaksi antar Bank, transaksi pembiayaan perdagangan, transaksi nilai tukar dan derivatif serta kewajiban komitmen dan kontinjensi.

Sebagai bagian dari pengelolaan risiko kredit, Bank secara teratur meninjau dan memperbarui Pedoman Kebijakan Kredit dan Pembiayaan untuk kredit dan pembiayaan sebagai bagian dari proses penilaian risiko. Eksposur Risiko Kredit dipantau sejak proses pemberian kredit sampai dengan jatuh tempo kredit. Pemantauan dan pengendalian risiko kredit di antaranya dengan mengevaluasi eksposur risiko kredit terhadap limit risiko kredit (*Risk Appetite and Risk Tolerance*).

Pengelolaan kredit Bank diarahkan untuk melakukan ekspansi kredit dan mengelola kualitas setiap kredit sejak saat diberikan sampai dengan dilunasi oleh debitur dan untuk mencegah kredit tersebut menjadi kredit. Pengelolaan kredit yang efektif dapat meminimalkan kerugian dan mengoptimalkan penggunaan modal yang dialokasikan untuk risiko kredit.

Reviu Kredit UMKM dan Komersial bersama Direksi, Divisi, CBC, Kantor Cabang secara bulanan atau bila diminta sewaktu-waktu sebagai upaya memberikan gambaran terkini mengenai posisi dan kualitas kredit baik secara *bankwide* maupun per segmentasi kredit. Dalam hal peningkatan proses pengambilan keputusan pemberian kredit, Bank juga melakukan pembentukan komite kredit melalui Rapat Komite Kredit disertai dengan sentralisasi proses kredit.

45. RISK MANAGEMENT

Credit Risk

Credit Risk is the risk of loss resulting from the failure of another party to fulfill its obligations. This includes Credit Risk arising from debtor default, Credit Risk due to concentration of funds (Credit Concentration Risk), Credit Risk from counterparty default (Counterparty Credit Risk), Credit Risk from settlement failures (Settlement Risk), and Credit Risk from country risk.

Credit Risk can arise from various business activities of the Bank. Lending represents the largest source of Credit Risk. Besides loans, the Bank encounters Credit Risk from various financial instruments such as securities, acceptances, interbank transactions, trade finance transactions, foreign exchange and derivatives transactions, as well as commitment and contingency obligations.

As part of credit risk management, the Bank regularly reviews and updates the Credit and Financing Policy Guidelines for both credit and financing as part of the risk assessment process. Credit Risk Exposure is monitored from the issuance of credit through to its maturity. Credit risk monitoring and control involve assessing credit risk exposure relative to credit risk limits (Risk Appetite and Risk Tolerance).

The Bank's loan management is aimed to support the loan expansion and to manage the quality of each loan from the time the loan was granted until the loan is fully repaid by the debtors and to prevent the loan becoming a Non-Performing Loan (NPL). Effective loan management is intended to minimize the risk of losses and optimize the use of capital allocated for credit risk.

Bank actively conducts the MSME and Commercial Loans Portfolio Quality Review Forums with the Board of Directors, Divisions, CBC, Branch Offices on a monthly basis or when requested at any time in an effort to provide an up-to-date picture of the position and quality of loans both bankwide and per loan segment. In terms of improving the credit decision making process, the Bank has also established a credit committee through Credit Committee Meetings along with centralizing the credit process.

45. MANAJEMEN RISIKO (lanjutan)

Risiko Kredit (lanjutan)

Pada segmen kredit komersial, Bank telah mengimplementasikan *Commercial Banking Center (CBC)* dimana CBC berfungsi sebagai sentralisasi pemrosesan kredit komersial. Pada segmen SME, Bank juga sedang melakukan implementasi SPU (Sentra Proses UMKM) sebagai upaya perbaikan proses dan pengelolaan kredit UMKM untuk meningkatkan produktivitas, perbaikan kualitas putusan kredit yang tersentral dan objektif, serta monitoring yang tersentralisasi. Bank juga mulai menerapkan Portfolio Guideline untuk Kredit *Wholesale* sebagai pengendalian risiko konsentrasi kredit dengan tetap mengedepankan asas prudent dan governance. Bank melakukan beberapa pengembangan model terkait pengelolaan risiko kredit seperti pada segment SME dikembangkan sistem *Credit Scoring* Model SME dan pada segment kredit UMKM, Komersial dan Korporasi sedang dikembangkan *Early Warning System* (EWS).

Pada kredit konsumer, proses pengendalian risiko kredit dilakukan melalui sistem iLoan Konsumer yang dilengkapi dengan *Credit Scoring Model* (CSM) dimana saat ini sedang dilakukan pengembangan pada CSM Bank. Selain itu, Bank melakukan Performance Review Kredit Konsumer secara berkala bersama direktur bidang dan unit kerja terkait sebagai upaya untuk memberikan gambaran terkini mengenai posisi dan kualitas kredit dan pembiayaan baik secara bankwide maupun per segmentasi kredit konsumer. Pengelolaan debitur kredit konsumer Kol-2 dan NPL dilakukan oleh Satuan Kerja Pembinaan, Penyelamatan & Penyelesaian Kredit Konsumer sedangkan untuk kredit komersial dilakukan oleh Satuan Kerja Commercial Asset Management.

Sebagai tindak lanjut penerapan Pilar 1 Basel II, Bank mengimplementasikan pengukuran risiko kredit dengan menggunakan Standardized Approach sesuai dengan SE OJK No. 24/SEOJK.03/2021 tanggal 7 Oktober 2021 perihal Perhitungan Aset Tertimbang Menurut Risiko (ATMR) untuk Risiko Kredit dengan menggunakan Pendekatan Standar bagi Bank Umum yang efektif diberlakukan pada Januari 2023.

45. RISK MANAGEMENT (continued)

Credit Risk (continued)

In the commercial loan segment, the Bank has implemented the Commercial Banking Center (CBC) where the CBC serves as the centralization of commercial loan processing. In the SME segment, the Bank is also implementing SPU (MSME Process Center) as an effort to improve the process and management of MSME loans to increase productivity, improve the quality of credit decisions that are centralized and objective, and centralized monitoring. The Bank has also started to implement Portfolio Guideline for Wholesale Loans as a credit concentration risk control while still prioritizing prudent and governance principles. The Bank conducted several system developments such as in the SME segment, the Credit Scoring Model SME system was developed and in the MSME, Commercial and Corporate loan segments an Early Warning System (EWS) is being developed.

In consumer loans, credit risk management is carried out through the iLoan Consumer system, which includes a Credit Scoring Model (CSM). The Bank is currently enhancing its CSM. In addition, the Bank conducts periodic Consumer Credit Performance Reviews with field directors and related work units as an effort to provide an up-to-date picture of the position and quality of loans and financing both bankwide and per consumer credit segmentation. The management of consumer credit debtors classified as Kol-2 and NPL is handled by the Consumer Collection and Remedial Unit, whereas commercial credit is managed by the Commercial Asset Management Unit.

As part of implementing Pillar 1 of Basel II, the Bank has adopted the Standardized Approach for measuring credit risk, in accordance with OJK Circular Letter No. 24/SEOJK.03/2021 dated October 7, 2021, regarding the Calculation of Risk-Weighted Assets (RWA) for Credit Risk using the Standard Approach for Commercial Banks, which will come into effect in January 2023.

45. MANAJEMEN RISIKO (lanjutan)

Risiko Kredit (lanjutan)

Dalam rangka mengelola risiko kredit, Bank telah menerapkan *Four Eyes Principle* dengan memisahkan fungi risiko kredit dan unit bisnis. Dalam putusan kredit komersial terdiri dari *Commercial Risk* dan Unit Bisnis selaku *Risk Taking Unit* dan *first line* serta putusan kredit konsumer yang terdiri dari *Retail Risk Division (Regional Loan Processing Center)* dan Kantor Cabang maupun Kantor Wilayah.

Dalam memperkuat manajemen risiko pembiayaan untuk mengendalikan komposisi portofolio kredit Bank dan memastikan laju pertumbuhan portofolio kredit yang sehat maka Bank BTN melakukan pengelolaan risiko kredit melalui *Portfolio Guideline* agar dapat menghindarkan bank dari bahaya risiko konsentrasi. *Portfolio Guideline* merupakan inisiatif strategis dalam penyaluran pembiayaan Bank untuk selalu memperhatikan kondisi makro ekonomi yang terkini terutama pada sektor-sektor tertentu yang dinilai masih layak untuk dibiayai termasuk beberapa sektor yang dapat digunakan sebagai sektor-sektor prioritas termasuk didalamnya aspek analisa dan monitoring terhadap NPL per sektor industri, limit pembiayaan per sektor industri dan prospek sektor industri dalam mendukung perkembangan usaha bisnis Perseroan serta mempertimbangkan aspek ESG dalam penetapannya.

45. RISK MANAGEMENT (continued)

Credit Risk (continued)

In managing credit risk, the Bank has implemented the Four Eyes Principle by separating the credit risk function from the business units. For commercial credit decisions, there are distinct roles for Commercial Risk and the Business Unit as the Risk Taking Unit and first line of defense. For consumer credit decisions, the roles are divided between the Retail Risk Division (Regional Loan Processing Center) and the Branch Offices or Regional Offices.

In strengthening financing risk management to control the composition of the Bank's loan portfolio and ensure a healthy loan portfolio growth rate, Bank BTN manages credit risk through Portfolio Guideline in-order-to avoid the danger of concentration risk. Portfolio Guideline is a strategic initiative in channelling the Bank's financing to always pay attention to the latest macroeconomic conditions, especially in certain sectors that are considered still feasible to finance, including several sectors that can be used as priority sectors, including aspects of analysis and monitoring of NPL per industrial sector, financing limits per industrial sector and industrial sector prospects in supporting the development of the Company's business business and considering ESG aspects in its determination.

45. MANAJEMEN RISIKO (lanjutan)

Risiko Kredit (lanjutan)

(i) Analisa eksposur maksimum terhadap risiko kredit setelah memperhitungkan dampak agunan dan mitigasi risiko kredit lainnya:

Nilai tercatat dari aset keuangan Bank selain kredit yang diberikan menggambarkan eksposur maksimum atas risiko kredit.

Bank menetapkan jenis dan nilai agunan yang dijaminkan sesuai skema kredit dan perkiraan tingkat risiko kredit dari *counterparty* sebagai *second way out* yang ditetapkan. Jenis dari agunan terdiri dari:

a) *Physical collateral,* berupa tanah dan bangunan.

b) *Financial collateral,* berupa simpanan (tabungan, giro dan deposito), surat berharga, dan lain-lain.

c) Lainnya berupa garansi, lembaga penjamin, dan lain-lain.

Pemberian kredit yang dilaksanakan oleh Bank diatur dalam kebijakan dan prosedur perkreditan dimana untuk setiap jenis atau skema kredit telah ditentukan agunan minimal yang harus dipenuhi.

Untuk segmen kredit komersial yang umumnya merupakan kredit yasa griya, sesuai ketentuan perkreditan wajib dijamin oleh agunan yang memadai. Agunan dapat berupa *physical collateral*, *financial collateral* atau lainnya berupa tagihan usaha atau garansi. Untuk seluruh agunan khususnya *physical collateral* akan dilakukan retaksasi dimana nilai likuidasi atas agunan tersebut yang akan dipergunakan dalam menentukan kecukupan nilai agunan *(coverage ratio)*.

Selain aspek agunan untuk meminimalkan risiko kredit, pemberian kredit oleh Bank selalu dilakukan berdasarkan evaluasi dan analisa kelayakan sehingga kemampuan pengembalian kredit *(first way out)* dapat dipastikan.

Adanya keharusan bagi debitur untuk memenuhi agunan yang dipersyaratkan, evaluasi atas kelayakan kredit, pengikatan kredit secara legal dan prosedur *pre screening* akan menurunkan *credit risk* eksposur Bank ke tingkat yang layak dan dapat diterima.

45. RISK MANAGEMENT (continued)

Credit Risk (continued)

(i) Analysis on maximum exposures against credit risks considering the impact of collateral and other credit risks mitigation:

The carrying value of the Bank's financial assets other than loans represents its maximum exposure to credit risk.

The Bank determined the type and value of collateral according to the loan scheme as well as estimated credit risk level from the counterparty as a determined second way out. The types of collateral are as follows:

a) Physical collateral, such as land and buildings.

b) Financial collateral, such as third party funds (saving deposits, demand deposits and time deposits), securities, etc.

c) Others, such as guarantees, guarantee institution, etc.

The loan granting conducted by the Bank is stipulated in the loan policy and procedure in which every loan type or scheme has minimum determinable collaterals that should be fulfilled.

For commercial loans segment which generally represent yasa griya loan, according to the loan policy has to be collateralized adequately. The collaterals can be physical collateral, financial collateral or others such as accounts receivable or guarantees. All collaterals particularly for physical collateral will be assessed in which the collateral's liquidation value will be used in determining the coverage ratio.

In addition to collateral aspect to minimize credit risk, loan granting is conducted based on evaluation and feasibility analysis so that the loan repayment ability (first way out) can be ascertained.

The necessity for debtors to comply with collaterals requirement, loan feasibility evaluation, notarial agreement and pre screening procedures will decrease the Bank's credit risk exposure to the acceptable level.

45. MANAJEMEN RISIKO (lanjutan)

Risiko Kredit (lanjutan)

(ii) Konsentrasi risiko aset keuangan dengan eksposur risiko kredit

a) Sektor geografis

Tabel berikut menggambarkan rincian eksposur kredit Bank pada nilai tercatat, yang dikategorikan berdasarkan area geografis pada tanggal 31 Desember 2024, 2023 dan 2022. Untuk tabel ini, Bank telah mengalokasikan eksposur area berdasarkan wilayah geografis tempat mereka beroperasi.

45. RISK MANAGEMENT (continued)

Credit Risk (continued)

(ii) Concentration of risks of financial assets with credit risk exposure

a) Geographical sectors

The following tables provide details of the Bank's credit exposures at their carrying amounts, as categorized by geographical region as of December 31, 2024, 2023 and 2022. For these tables, the Bank has allocated exposures to the regions based on the geographical area where activities are undertaken.

	31 Desember/*December 31,* 2024						
	Kantor Pusat/ *Head Office*	**Jabodetabek**	**Jawa selain Jabodetabek/ *Java other than Jabodetabek***	**Sumatera**	**Lain-lain/ *Others***)**	**Total**	
Giro pada Bank Indonesia	22.739.920	-	-	-	-	22.739.920	*Current accounts with Bank Indonesia*
Giro pada bank lain	5.950.059	-	31	1.636	20	5.951.746	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	4.661.104	-	-	-	-	4.661.104	*Placements with Bank Indonesia and other banks*
Efek-efek	24.971.697	383.875	-	7.838	-	25.363.410	*Securities*
Obligasi Pemerintah	35.475.529	-				35.475.529	*Government bonds*
Tagihan akseptasi	-	941.898	-	-	-	941.898	*Acceptance receivable*
Efek-efek yang dibeli Janji dijual kembali	175.625	-	-	-	-	175.625	*Securities purchased under agreement to resell*
Tagihan derivatif	102.843	-	-	-	-	102.843	*Derivative receivable*
Kredit yang diberikan dan piutang/pembiayaan syariah							*Loans and sharia financing/ receivables*
Konsumer							*Consumer*
Pemilikan rumah	-	116.464.607	73.058.790	44.058.405	46.349.214	279.931.016	*Housing loan*
Non-kepemilikan rumah	-	4.637.889	4.708.817	1.836.661	3.340.846	14.524.213	*Non-housing loan*
Modal kerja	-	24.174.581	7.438.085	2.653.174	2.462.040	36.727.880	*Working capital*
Investasi	-	14.354.998	1.700.369	776.661	361.354	17.193.382	*Investment*
Sindikasi	-	7.785.728	-	-	-	7.785.728	*Syndicated*
Direksi dan karyawan							*Director and Employees*
- Pihak ketiga	-	736.962	490.660	229.176	282.410	1.739.208	*Third party -*
- Pihak berelasi	-	39.362	16.671	4.960	10.512	71.505	*Related party -*
Bunga yang masih akan diterima	607.244	5.591.111	3.013.745	1.142.511	1.163.963	11.518.574	*Interest receivable*
Aset lain-lain*)	1.000.199	765.978	8.716	2.238	4.753	1.781.884	*Other assets**)
Total kotor	**95.684.220**	**175.876.989**	**90.435.884**	**50.713.260**	**53.975.112**	**466.685.465**	***Total gross***
Cadangan kerugian penurunan nilai						(13.062.532)	*Allowances for impairment losses*
Neto						**453.622.933**	***Net***

*) Terdiri atas tagihan kepada pihak ketiga
**) Lain-lain terdiri atas Kalimantan, Sulawesi, Bali, Maluku dan Papua.

*) *Consists of third parties receivables*
**) *Others consists of Kalimantan, Sulawesi, Bali, Maluku and Papua.*

45. MANAJEMEN RISIKO (lanjutan)

Risiko Kredit (lanjutan)

(ii) Konsentrasi risiko aset keuangan dengan eksposur risiko kredit (lanjutan)

a) Sektor geografis (lanjutan)

Tabel berikut menggambarkan rincian eksposur kredit Bank pada nilai tercatat, yang dikategorikan berdasarkan area geografis pada tanggal 31 Desember 2024, 2023 dan 2022. Untuk tabel ini, Bank telah mengalokasikan eksposur area berdasarkan wilayah geografis tempat mereka beroperasi. (lanjutan)

45. RISK MANAGEMENT (continued)

Credit Risk (continued)

(ii) Concentration of risks of financial assets with credit risk exposure (continued)

a) Geographical sectors (continued)

The following tables provide details of the Bank's credit exposures at their carrying amounts, as categorized by geographical region as of December 31,2024, 2023 and 2022. For these tables, the Bank has allocated exposures to the regions based on the geographical area where activities are undertaken. (continued)

	31 Desember/*December 31,* 2023						
	Kantor Pusat/ *Head Office*	**Jabodetabek**	**Jawa selain Jabodetabek/ *Java other than Jabodetabek***	**Sumatera**	**Lain-lain/ *Others***)**	**Total**	
Giro pada Bank Indonesia	18.145.761	-	-	-	-	18.145.761	*Current accounts with Bank Indonesia*
Giro pada bank lain	2.202.683	-	403	288	24	2.203.398	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	30.561.122	-	-	-	-	30.561.122	*Placements with Bank Indonesia and other banks*
Efek-efek	4.661.195	644.080	598	-	-	5.305.873	*Securities*
Obligasi Pemerintah	35.893.929	-	-	-	-	35.893.929	*Government bonds*
Tagihan akseptasi	-	544.567	-	-	-	544.567	*Acceptance receivable*
Tagihan derivatif	32.176	-	-	-	-	32.176	*Derivative receivable*
Kredit yang diberikan dan piutang/pembiayaan syariah							*Loans and sharia financing/ receivables*
Konsumer							*Consumer*
Pemilikan rumah	-	108.384.592	66.369.601	40.751.732	42.564.956	258.070.881	*Housing loan*
Non-kepemilikan rumah	-	3.953.716	4.334.006	1.612.985	3.105.874	13.006.581	*Non-housing loan*
Modal kerja	-	26.289.070	6.911.050	2.402.162	2.357.847	37.960.129	*Working capital*
Investasi	-	13.025.928	1.571.579	688.670	245.830	15.532.007	*Investment*
Sindikasi	-	7.150.361		-	-	7.150.361	*Syndicated*
Direksi dan karyawan:							*Director and Employees*
- Pihak ketiga	-	815.126	518.583	253.279	306.644	1.893.632	*Third party -*
- Pihak berelasi	-	44.440	23.270	5.808	11.032	84.550	*Related party -*
Bunga yang masih akan diterima	535.488	5.711.328	2.935.706	1.061.214	1.282.951	11.526.687	*Interest receivable*
Aset lain-lain*)	1.495.389	363.395	8.930	2.068	3.714	1.873.496	*Other assets**)
Total kotor	**95.684.220**	**175.876.989**	**90.435.884**	**50.713.260**	**53.975.112**	**466.685.465**	***Total gross***
Cadangan kerugian penurunan nilai						(15.640.547)	*Allowances for impairment losses*
Neto						**451.044.918**	***Net***

*) Terdiri atas tagihan kepada pihak ketiga
**) Lain-lain terdiri atas Kalimantan, Sulawesi, Bali, Maluku dan Papua.

*) *Consists of third parties receivables*
**) *Others consists of Kalimantan, Sulawesi, Bali, Maluku and Papua.*

45. MANAJEMEN RISIKO (lanjutan)

Risiko Kredit (lanjutan)

(ii) Konsentrasi risiko aset keuangan dengan eksposur risiko kredit (lanjutan)

a) Sektor geografis (lanjutan)

Tabel berikut menggambarkan rincian eksposur kredit Bank pada nilai tercatat, yang dikategorikan berdasarkan area geografis pada tanggal 31 Desember 2024, 2023 dan 2022. Untuk tabel ini, Bank telah mengalokasikan eksposur area berdasarkan wilayah geografis tempat mereka beroperasi. (lanjutan)

45. RISK MANAGEMENT (continued)

Credit Risk (continued)

(ii) Concentration of risks of financial assets with credit risk exposure (continued)

a) Geographical sectors (continued)

The following tables provide details of the Bank's credit exposures at their carrying amounts, as categorized by geographical region as of December 31,2024, 2023 and 2022. For these tables, the Bank has allocated exposures to the regions based on the geographical area where activities are undertaken. (continued)

	31 Desember/*December 31,* 2022						
	Kantor Pusat/ *Head Office*	**Jabodetabek**	**Jawa selain Jabodetabek/ *Java other than Jabodetabek***	**Sumatera**	**Lain-lain/ *Others*****	**Total**	
Giro pada Bank Indonesia	25.416.941	-	-	-	-	25.416.941	*Current accounts with Bank Indonesia*
Giro pada bank lain	1.470.723	-	240	1.271	23	1.472.257	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	12.975.955	-	-	-	-	12.975.955	*Placements with Bank Indonesia and other banks*
Efek-efek	1.723.168	-				1.723.168	*Securities*
Obligasi Pemerintah	51.964.973	-	-	-	-	51.964.973	*Government bonds*
Efek - efek yang dibeli dengan janji dijual kembali	1.434.190	-	-	-	-	1.434.190	*Securities purchased under agreement to resell*
Tagihan akseptasi	-	410.219	10.343	-	-	420.562	*Acceptance receivable*
Tagihan derivatif	103.939	-	-	-	-	103.939	*Derivative receivable*
Kredit yang diberikan dan piutang/pembiayaan syariah							*Loans and sharia financing/ receivables*
Konsumer							*Consumer*
Pemilikan rumah	-	98.728.648	59.465.684	37.405.974	38.286.748	233.887.054	*Housing loan*
Non-kepemilikan rumah	-	3.415.964	3.965.796	1.400.018	2.907.880	11.689.658	*Non-housing loan*
Modal kerja	-	22.394.510	7.732.094	2.044.470	2.284.609	34.455.683	*Working capital*
Investasi	-	9.556.832	1.246.509	636.549	203.732	11.643.622	*Investment*
Sindikasi	-	4.504.244	-	-	-	4.504.244	*Syndicated*
Direksi dan karyawan:							*Director and Employees*
- Pihak ketiga	-	874.100	538.776	273.637	321.567	2.008.080	*Third party -*
- Pihak berelasi	-	52.022	22.575	6.090	12.676	93.363	*Related party -*
Bunga yang masih akan diterima	556.024	5.216.864	2.719.508	993.220	1.264.686	10.750.302	*Interest receivable*
Aset lain-lain*)	948.131	78.478	8.250	2.090	3.099	1.040.048	*Other assets*)*
Total kotor	**96.594.044**	**145.231.881**	**75.709.775**	**42.763.319**	**45.285.020**	**405.584.039**	***Total gross***
Cadangan kerugian penurunan nilai						(15.679.205)	*Allowances for impairment losses*
Neto						**389.904.834**	***Net***

*) Terdiri atas tagihan kepada pihak ketiga
**) Lain-lain terdiri atas Kalimantan, Sulawesi, Bali, Maluku dan Papua.

*) *Consists of third parties receivables*
**) *Others consists of Kalimantan, Sulawesi, Bali, Maluku and Papua.*

45. MANAJEMEN RISIKO (lanjutan)

Risiko Kredit (lanjutan)

(ii) Konsentrasi risiko aset keuangan dengan eksposur risiko kredit (lanjutan)

Eksposur risiko kredit atas rekening administratif pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022 adalah sebagai berikut:

45. RISK MANAGEMENT (continued)

Credit Risk (continued)

(ii) Concentration of risks of financial assets with credit risk exposure (continued)

Credit risk exposure related to administrative accounts as of December 31, 2024, 2023 and 2022 are as follows:

31 Desember/*December 31,* 2024

	Kantor Pusat/ *Head Office*	Jabodetabek	Jawa selain Jabodetabek/ *Java other than Jabodetabek*	Sumatera	Lain-lain/ *Others**)	Total	
Fasilitas kredit yang belum ditarik **)	-	30.170	43.227	11.408	1.379	86.184	*Unused loan facilities***)
Garansi yang diterbitkan	-	1.720.973	1.019.953	154.606	228.471	3.124.003	*Guarantees issued*
Irrevocable L/C Yang masih berjalan	-	249.694	-	-	-	249.694	*Outstanding irrevocable L/Cs*
Total	**-**	**2.000.837**	**1.063.180**	**166.014**	**229.850**	**5.187.592**	***Total***

31 Desember/*December 31,* 2023

	Kantor Pusat/ *Head Office*	Jabodetabek	Jawa selain Jabodetabek/ *Java other than Jabodetabek*	Sumatera	Lain-lain/ *Others**)	Total	
Fasilitas kredit yang belum ditarik **)	-	34.511	39.265	46.294	7.013	127.083	*Unused loan facilities***)
Garansi yang diterbitkan	-	1.189.111	1.176.639	88.872	124.553	2.579.175	*Guarantees issued*
Irrevocable L/C Yang masih berjalan	-	19.393	-	713	-	20.106	*Outstanding irrevocable L/Cs*
Total	**-**	**1.243.015**	**1.215.904**	**135.879**	**131.566**	**2.726.364**	***Total***

31 Desember/*December 31,* 2022

	Kantor Pusat/ *Head Office*	Jabodetabek	Jawa selain Jabodetabek/ *Java other than Jabodetabek*	Sumatera	Lain-lain/ *Others**)	Total	
Fasilitas kredit yang belum ditarik **)	-	15.819	36.774	25.471	2.064	80.128	*Unused loan facilities***)
Garansi yang diterbitkan	-	718.932	190.123	623	38.817	948.495	*Guarantees issued*
Irrevocable L/C Yang masih berjalan	-	173.743	47.741	-	-	221.484	*Outstanding irrevocable L/Cs*
Total	**-**	**908.494**	**274.638**	**26.094**	**40.881**	**1.250.107**	***Total***

*) Lain-lain terdiri atas Kalimantan, Sulawesi, Bali, Maluku dan Papua
**) Hanya fasilitas kredit *committed* yang belum ditarik

*) *Others consists of Kalimantan, Sulawesi, Bali, Maluku and Papua*
**) *Only for committed unused loan facility*

45. MANAJEMEN RISIKO (lanjutan)

Risiko Kredit (lanjutan)

(ii) Konsentrasi risiko aset keuangan dengan eksposur risiko kredit (lanjutan)

b) Sektor industri

Tabel berikut ini menggambarkan rincian eksposur kredit Bank pada nilai tercatat (tanpa memperhitungkan agunan atau pendukung kredit lainnya), yang dikategorikan berdasarkan sektor industri pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022:

45. RISK MANAGEMENT (continued)

Credit Risk (continued)

(ii) Concentration of risks of financial assets with credit risk exposure (continued)

b) Industry sectors

The following tables provide the details of the Bank's credit exposure at carrying amounts (without taking into account any collateral held or other credit tenhancements), categorized based on industry sectors as of December 31, 2024, 2023 and 2022:

	31 Desember/*December 31*, 2024						
	Pemerintah (termasuk Bank Indonesia)/ *Government (including Bank Indonesia)*	**Bank/ *Banks***	**Lembaga keuangan bukan bank/ *Non-bank financial institutions***	**Perusahaan lainnya/ *Other companies***)**	**Perseorangan/ *Individuals***	**Total**	
Giro pada Bank Indonesia	22.739.920	-	-	-	-	22.739.920	*Current accounts with Bank Indonesia*
Giro pada bank lain	-	5.951.746	-	-	-	5.951.746	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	4.661.043	61	-	-	-	4.661.104	*Placements with Bank Indonesia and other banks*
Efek-efek	18.899.989	78.102	1.884.017	4.501.302	-	25.363.410	*Securities*
Obligasi Pemerintah	35.475.529	-	-	-	-	35.475.529	*Government bonds*
Efek-efek yang dibeli Janji dijual kembali	-	175.625	-	-	-	175.625	*Securities purchased under agreement to resell*
Tagihan Akseptasi	-	-	-	941.898	-	941.898	*Acceptance Receivable*
Tagihan Derivatif	-	102.843	-	-	-	102.843	*Derivative Receivable*
Kredit yang diberikan dan piutang/pembiayaan syariah	10.445.528	550.022	609.473	48.893.863	297.474.046	357.972.932	*Loans and sharia financing/ receivables*
Bunga yang masih akan diterima	731.559	1.894	4.059	1.661.468	9.119.594	11.518.574	*Interest receivable*
Aset lain-lain*)	194.296	2.383	73.893	1.230.420	280.892	1.781.884	*Other assets*)*
Total kotor	**93.147.864**	**6.862.676**	**2.571.442**	**57.228.951**	**306.874.532**	**466.685.465**	***Total gross***
Cadangan kerugian penurunan nilai						(13.062.532)	*Allowances for impairment losses*
Neto						**453.622.933**	***Net***

*) Terdiri atas tagihan kepada pihak ketiga.
**) Termasuk perusahaan yang bergerak di industri perumahan, konstruksi, manufaktur, transportasi, pergudangan dan komunikasi, perdagangan, pertanian, pertambangan dan industri lainnya.

*) *Consists of third party receivables.*
**) *Includes other companies under real estate, construction, manufacturing, transportation, warehousing and communication, trading, farming, mining and other industries.*

45. MANAJEMEN RISIKO (lanjutan)

Risiko Kredit (lanjutan)

(ii) Konsentrasi risiko aset keuangan dengan eksposur risiko kredit (lanjutan)

b) Sektor industri (lanjutan)

Tabel berikut ini menggambarkan rincian eksposur kredit Bank pada nilai tercatat (tanpa memperhitungkan agunan atau pendukung kredit lainnya), yang dikategorikan berdasarkan sektor industri pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022: (lanjutan)

45. RISK MANAGEMENT (continued)

Credit Risk (continued)

(ii) Concentration of risks of financial assets with credit risk exposure (continued)

b) Industry sectors (continued)

The following tables provide the details of the Bank's credit exposure at carrying amounts (without taking into account any collateral held or other credit enhancements), categorized based on industry sectors as of December 31, 2024, 2023 and 2022: (continued)

	31 Desember/*December 31*, 2023						
	Pemerintah (termasuk Bank Indonesia)/ *Government (including Bank Indonesia)*	**Bank/ *Banks***	**Lembaga keuangan bukan bank/ *Non-bank financial institutions***	**Perusahaan lainnya/ *Other companies***)**	**Perseorangan/ *Individuals***	**Total**	
Giro pada Bank Indonesia	18.145.761	-	-	-	-	18.145.761	*Current accounts with Bank Indonesia*
Giro pada bank lain	-	2.203.398	-	-	-	2.203.398	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	12.148.687	18.412.435	-	-	-	30.561.122	*Placements with Bank Indonesia and other banks*
Efek-efek	501.570	163.395	1.989.553	2.651.355	-	5.305.873	*Securities*
Obligasi Pemerintah	35.893.929	-	-	-	-	35.893.929	*Government bonds*
Tagihan Akseptasi	-	-	-	544.567	-	544.567	*Acceptance Receivable*
Tagihan Derivatif	-	32.176	-	-	-	32.176	*Derivative Receivable*
Kredit yang diberikan dan piutang/pembiayaan syariah	7.558.101	1.325.728	1.407.154	48.195.548	275.211.610	333.698.141	*Loans and sharia financing/ receivables*
Bunga yang masih akan diterima	709.162	4.651	7.818	2.120.280	8.684.776	11.526.687	*Interest receivable*
Aset lain-lain*)	574.025	31.022	75.821	876.238	316.390	1.873.496	*Other assets**)*
Total kotor	**75.531.235**	**22.172.805**	**3.480.346**	**54.387.988**	**284.212.776**	**439.785.150**	***Total gross***
Cadangan kerugian penurunan nilai						(15.640.547)	*Allowances for impairment losses*
Neto						**424.144.603**	***Net***

*) Terdiri atas tagihan kepada pihak ketiga.
**) Termasuk perusahaan yang bergerak di industri perumahan, konstruksi, manufaktur, transportasi, pergudangan dan komunikasi, perdagangan, pertanian, pertambangan dan industri lainnya.

*) *Consists of third party receivables.*
**) *Includes other companies under real estate, construction, manufacturing, transportation, warehousing and communication, trading, farming, mining and other industries.*

45. MANAJEMEN RISIKO (lanjutan)

Risiko Kredit (lanjutan)

(ii) Konsentrasi risiko aset keuangan dengan eksposur risiko kredit (lanjutan)

b) Sektor industri (lanjutan)

Tabel berikut ini menggambarkan rincian eksposur kredit Bank pada nilai tercatat (tanpa memperhitungkan agunan atau pendukung kredit lainnya), yang dikategorikan berdasarkan sektor industri pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022: (lanjutan)

45. RISK MANAGEMENT (continued)

Credit Risk (continued)

(ii) Concentration of risks of financial assets with credit risk exposure (continued)

b) Industry sectors (continued)

The following tables provide the details of the Bank's credit exposure at carrying amounts (without taking into account any collateral held or other credit enhancements), categorized based on industry sectors as of December 31, 2024, 2023 and 2022: (continued)

	31 Desember/*December 31*, 2022						
	Pemerintah (termasuk Bank Indonesia)/ *Government (including Bank Indonesia)*	**Bank/ *Banks***	**Lembaga keuangan bukan bank/ *Non-bank financial institutions***	**Perusahaan lainnya/ *Other companies***)**	**Perseorangan/ *Individuals***	**Total**	
Giro pada Bank Indonesia	25.416.941	-	-	-	-	25.416.941	*Current accounts with Bank Indonesia*
Giro pada bank lain	-	1.472.257	-	-	-	1.472.257	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	12.575.894	400.061	-	-	-	12.975.955	*Placements with Bank Indonesia and other banks*
Efek-efek	-	547.036	593.031	583.101	-	1.723.168	*Securities*
Obligasi Pemerintah	51.964.973	-	-	-	-	51.964.973	*Government bonds*
Efek - efek yang dibeli dengan janji dijual kembali	1.434.190	-	-	-	-	1.434.190	*Securities purchased under agreement to resell*
Tagihan Akseptasi	-	-	-	420.562	-	420.562	*Acceptance Receivable*
Tagihan Derivatif	-	103.939			-	103.939	*Derivative Receivable*
Kredit yang diberikan dan piutang/pembiayaan syariah	4.516.550	40.261	810.586	44.381.293	248.533.014	298.281.704	*Loans and sharia financing/ receivables*
Bunga yang masih akan diterima	545.988	31.175	4.023	2.427.021	7.742.095	10.750.302	*Interest receivable*
Aset lain-lain*)	5.733	488.071	-	403.022	143.222	1.040.048	*Other assets*)*
Total kotor	**96.460.269**	**3.082.800**	**1.407.640**	**48.214.999**	**256.418.331**	**405.584.039**	***Total gross***
Cadangan kerugian penurunan nilai						(15.679.205)	*Allowances for impairment losses*
Neto						**389.904.834**	***Net***

*) Terdiri atas tagihan kepada pihak ketiga.
**) Termasuk perusahaan yang bergerak di industri perumahan, konstruksi, manufaktur, transportasi, pergudangan dan komunikasi, perdagangan, pertanian, pertambangan dan industri lainnya.

*) *Consists of third party receivables.*
**) *Includes other companies under real estate, construction, manufacturing, transportation, warehousing and communication, trading, farming, mining and other industries.*

45. MANAJEMEN RISIKO (lanjutan)

Risiko Kredit (lanjutan)

(ii) Konsentrasi risiko aset keuangan dengan eksposur risiko kredit (lanjutan)

b) Sektor industri (lanjutan)

Eksposur risiko kredit yang terkait dengan unsur rekening administratif adalah sebagai berikut pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022: (lanjutan)

45. RISK MANAGEMENT (continued)

Credit Risk (continued)

(ii) Concentration of risks of financial assets with credit risk exposure (continued)

b) Industry sectors (continued)

Credit risk exposure relating to administrative account items as of December 31, 2024, 2023 and 2022, are as follows: (continued)

31 Desember/*December 31,* 2024

	Pemerintah (termasuk Bank Indonesia)/ *Government (including Bank Indonesia)*	Bank/ *Banks*	Lembaga keuangan bukan bank/ *Non-bank financial institutions*	Perusahaan lainnya/ *Other companies**)	Perseorangan/ *Individuals*	Total	
Fasilitas kredit yang belum ditarik **)	-	-	-	54.766	31.418	86.184	*Unused loan facilities***)
Garansi yang diterbitkan	-	-	-	3.122.286	1.717	3.124.003	*Guarantees issued*
Irrevocable L/C yang masih berjalan	-	-	-	249.694	-	249.694	*Outstanding irrevocable L/Cs*
Total	**-**	**-**	**-**	**3.426.746**	**33.135**	**3.459.881**	***Total***

*) Termasuk perusahaan yang bergerak di industri perumahan, konstruksi, manufaktur, transportasi, pergudangan dan komunikasi, perdagangan, pertanian, pertambangan dan industri lainnya.
**) Hanya fasilitas kredit komitmen yang belum ditarik

**) Includes other companies under real estate, construction, manufacturing, transportation, warehousing and communication, trading, farming, mining and other industries.*
***) Only for committed unused loan facility*

31 Desember/*December 31,* 2023

	Pemerintah (termasuk Bank Indonesia)/ *Government (including Bank Indonesia)*	Bank/ *Banks*	Lembaga keuangan bukan bank/ *Non-bank financial institutions*	Perusahaan lainnya/ *Other companies**)	Perseorangan/ *Individuals*	Total	
Fasilitas kredit yang belum ditarik **)	-	-	140	120.686	6.257	127.083	*Unused loan facilities***)
Garansi yang diterbitkan	-	-	-	2.576.727	2.448	2.579.175	*Guarantees issued*
Irrevocable L/C yang masih berjalan	-	-	-	20.106	-	20.106	*Outstanding irrevocable L/Cs*
Total	**-**	**-**	**140**	**2.717.519**	**8.705**	**2.726.364**	***Total***

*) Termasuk perusahaan yang bergerak di industri perumahan, konstruksi, manufaktur, transportasi, pergudangan dan komunikasi, perdagangan, pertanian, pertambangan dan industri lainnya.
**) Hanya fasilitas kredit komitmen yang belum ditarik

**) Includes other companies under real estate, construction, manufacturing, transportation, warehousing and communication, trading, farming, mining and other industries.*
***) Only for committed unused loan facility*

45. MANAJEMEN RISIKO (lanjutan)

Risiko Kredit (lanjutan)

(ii) Konsentrasi risiko aset keuangan dengan eksposur risiko kredit (lanjutan)

b) Sektor industri (lanjutan)

Eksposur risiko kredit yang terkait dengan unsur rekening administratif adalah sebagai berikut pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022: (lanjutan)

45. RISK MANAGEMENT (continued)

Credit Risk (continued)

(ii) Concentration of risks of financial assets with credit risk exposure (continued)

b) Industry sectors (continued)

Credit risk exposure relating to administrative account items as of December 31, 2024, 2023 and 2022, are as follows: (continued)

	31 Desember/*December 31,* 2022						
	Pemerintah (termasuk Bank Indonesia)/ *Government (including Bank Indonesia)*	**Bank/ *Banks***	**Lembaga keuangan bukan bank/ *Non-bank financial institutions***	**Perusahaan lainnya/ *Other companies**)**	**Perseorangan/ *Individuals***	**Total**	
Fasilitas kredit yang belum ditarik **)	-	-	-	77.942	2.186	80.128	*Unused loan facilities***)
Garansi yang diterbitkan	-	-	-	946.635	1.860	948.495	*Guarantees issued*
Irrevocable L/C yang masih berjalan	-	-	-	221.484	-	221.484	*Outstanding irrevocable L/Cs*
Total	**-**	**-**	**-**	**1.246.061**	**4.046**	**1.250.107**	***Total***

*) Termasuk perusahaan yang bergerak di industri perumahan, konstruksi, manufaktur, transportasi, pergudangan dan komunikasi, perdagangan, pertanian, pertambangan dan industri lainnya.
**) Hanya fasilitas kredit komitmen yang belum ditarik

**) Includes other companies under real estate, construction, manufacturing, transportation, warehousing and communication, trading, farming, mining and other industries.*
***) Only for committed unused loan facility*

45. MANAJEMEN RISIKO (lanjutan)

45. RISK MANAGEMENT (continued)

Risiko Kredit (lanjutan)

Credit Risk (continued)

(iii) Informasi mengenai aset keuangan yang mengalami dan tidak mengalami penurunan nilai

(iii) Information about impaired and not impaired financial assets

1. Giro pada Bank Lain

1. Current Accounts with Other Banks

	31 Desember/*December 31,* 2024			
	Tidak mengalami penurunan nilai/ *Not Impaired*	**Mengalami penurunan nilai/ *Impaired**)**	**Total**	
Rupiah	130.372	-	130.372	*Rupiah*
Mata Uang Asing	5.819.625	1.749	5.821.374	*Foreign currencies*
Total	**5.949.997**	**1.749**	**5.951.746**	***Total***
Cadangan kerugian penurunan nilai			(2.571)	*Allowance for impairment losses*
Neto			**5.949.175**	***Net***

*) Kolektibilitas 3, 4 dan 5 — **) Collectibility 3, 4 and 5*

	31 Desember/*December 31,* 2023			
	Tidak mengalami penurunan nilai/ *Not Impaired*	**Mengalami penurunan nilai/ *Impaired**)**	**Total**	
Rupiah	234.046	-	234.046	*Rupiah*
Mata Uang Asing	1.967.574	1.778	1.969.352	*Foreign currencies*
Total	**2.201.620**	**1.778**	**2.203.398**	***Total***
Cadangan kerugian penurunan nilai			(1.804)	*Allowance for impairment losses*
Neto			**2.201.594**	***Net***

*) Kolektibilitas 3, 4 dan 5 — **) Collectibility 3, 4 and 5*

	31 Desember/*December 31,* 2022			
	Tidak mengalami penurunan nilai/ *Not Impaired*	**Mengalami penurunan nilai/ *Impaired**)**	**Total**	
Rupiah	540.052	-	540.052	*Rupiah*
Mata Uang Asing	930.474	1.731	932.205	*Foreign currencies*
Total	**1.470.526**	**1.731**	**1.472.257**	***Total***
Cadangan kerugian penurunan nilai			(1.747)	*Allowance for impairment losses*
Neto			**1.470.510**	***Net***

*) Kolektibilitas 3, 4 dan 5 — **) Collectibility 3, 4 and 5*

2. Penempatan pada Bank Indonesia dan bank lain.

   Per 31 Desember 2024, 2023 dan 2022, aset keuangan ini tidak mengalami penurunan nilai secara individual maupun kolektif.

2. Placements with Bank Indonesia and other banks.

As of December 31, 2024, 2023 and 2022, these financial assets are not impaired individually as well as collectively.

45. MANAJEMEN RISIKO (lanjutan)

45. RISK MANAGEMENT (continued)

Risiko Kredit (lanjutan)

Credit Risk (continued)

(iii) Informasi mengenai aset keuangan yang mengalami dan tidak mengalami penurunan nilai (lanjutan)

(iii) Information about impaired and not impaired financial assets (continued)

3. Efek-efek

3. Securities

	31 Desember/*December 31, 2024*			
	Tidak mengalami penurunan nilai/ *Not Impaired*	**Mengalami penurunan nilai/ *Impaired**)**	**Total**	
Reksadana	1.527.031	-	1.527.031	*Mutual Funds*
Obligasi	337.876	-	337.876	*Bonds*
Medium Term Notes	150.000	-	150.000	*Medium Term Notes*
Efek Beragunan Aset	458.876	-	458.876	*Asset-Backed Securities*
SKBDN	391.713	-	391.713	*SKBDN*
SRBI	10.092.016	-	10.092.016	*SRBI*
SVBI	8.807.973	-	8.807.973	*SVBI*
Sukuk	3.597.925	-	3.597.925	*Sukuk*
Total	**25.363.410**	**-**	**25.363.410**	***Total***
Cadangan kerugian penurunan nilai			(787)	*Allowance for impairment losses*
Neto			**25.362.623**	***Net***

*) Kolektibilitas 3, 4 dan 5

**) Collectibility 3, 4 and 5*

	31 Desember/*December 31, 2023*			
	Tidak mengalami penurunan nilai/ *Not Impaired*	**Mengalami penurunan nilai/ *Impaired**)**	**Total**	
Reksadana	1.372.968	-	1.372.968	*Mutual Funds*
Obligasi	2.046.215	-	2.046.215	*Bonds*
Medium Term Notes	200.000	-	200.000	*Medium Term Notes*
Efek Beragunan Aset	540.443	-	540.443	*Asset-Backed Securities*
SKBDN	644.677	-	644.677	*SKBDN*
SRBI	194.060	-	194.060	*SRBI*
SVBI	307.510	-	307.510	*SVBI*
Total	**5.305.873**	**-**	**5.305.873**	***Total***
Cadangan kerugian penurunan nilai			(22.903)	*Allowance for impairment losses*
Neto			**5.282.970**	***Net***

*) Kolektibilitas 3, 4 dan 5

**) Collectibility 3, 4 and 5*

	31 Desember/*December 31, 2022*			
	Tidak mengalami penurunan nilai/ *Not Impaired*	**Mengalami penurunan nilai/ *Impaired**)**	**Total**	
Reksadana	401.416	-	401.416	*Mutual Funds*
Obligasi	709.711	2.000	711.711	*Bonds*
Medium Term Notes	103.085	-	103.085	*Medium Term Notes*
Efek Beragunan Aset	492.415	-	492.415	*Asset-Backed Securities*
SKBDN	14.541	-	14.541	*SKBDN*
Total	**1.721.168**	**2.000**	1.723.168	***Total***
Cadangan kerugian penurunan nilai			(2.399)	*Allowance for impairment losses*
Neto			**1.720.769**	***Net***

*) Kolektibilitas 3, 4 dan 5

**) Collectibility 3, 4 and 5*

45. MANAJEMEN RISIKO (lanjutan)

Risiko Kredit (lanjutan)

(iii) Informasi mengenai aset keuangan yang mengalami dan tidak mengalami penurunan nilai (lanjutan)

4. Rekening administratif

Per 31 Desember 2024, 2023 dan 2022, rekening administratif mengalami penurunan nilai masing-masing sebesar Rp3.385, Rp3.580 dan Rp4.719.

5. Efek-efek yang dibeli dengan janji dijual kembali

Per 31 Desember 2024, 2023 dan 2022, efek-efek yang dibeli dengan janji dijual kembali tidak mengalami penurunan nilai.

6. Tagihan Akseptasi

Per 31 Desember 2024, 2023 dan 2022, tagihan akseptasi tidak mengalami penurunan nilai.

7. Kredit yang diberikan dan pembiayaan/ piutang syariah

Per 31 Desember 2024, 2023 dan 2022, aset keuangan ini mengalami penurunan nilai secara individual maupun kolektif sesuai ketentuan dalam PSAK No. 109 dan Peraturan Otoritas Jasa Keuangan (POJK).

45. RISK MANAGEMENT (continued)

Credit Risk (continued)

(iii) Information about impaired and not impaired financial assets (continued)

4. Administrative account

As of December 31, 2024, 2023 and 2022, administrative account which are impaired amounting to Rp3,385, Rp3,580 and Rp4,719, respectively.

5. *Securities Purchased Under Agreement to Resell*

As of December 31, 2024, 2023 and 2022, securities purchased under agreement to resell are not impaired.

6. Acceptance Receivable

As of December 31, 2024, 2023 and 2022, acceptance receivable are not impaired.

7. Loans and sharia financing/receivables

As of December 31, 2024, 2023 and 2022, these financial assets are impaired calculated by individual and collective impairment according to SFAS No. 109 and Financial Service Authority Regulations (POJK).

45. MANAJEMEN RISIKO (lanjutan)

Risiko Kredit (lanjutan)

(iv) Tabel di bawah menunjukkan kualitas aset keuangan berdasarkan golongan aset untuk semua aset keuangan yang mempunyai risiko kredit (diluar cadangan kerugian penurunan nilai bruto):

45. RISK MANAGEMENT (continued)

Credit Risk (continued)

(iv) The tables below shows the quality of financial assets by class of assets for all financial assets with credit risk (gross of allowance for impairment losses):

	31 Desember/*December 31*, 2024					
	Belum jatuh tempo dan tidak mengalami penurunan nilai/*neither past due nor impaired*		Jatuh tempo dan tidak mengalami penurunan nilai/ *Past due but not Impaired*	Mengalami penurunan nilai/ *Impaired*[***)]	Total	
	Tingkat tinggi/ *High Grade*[**)]	Tingkat standar/ *Standard grade*[**)]				
Efek-efek						***Securities***
Diukur pada nilai wajar melalui laporan laba rugi	19.358.865	-	-	-	19.358.865	*Fair value through profit -or-loss*
Diukur pada nilai wajar melalui penghasilan komprehensif lain	1.964.907	-	-	-	1.964.907	*Financial assets held at fair value through other comprehensive income*
Diukur pada biaya perolehan amortisasi	4.038.851	-	-	787	4.039.638	*Amortized cost*
Obligasi pemerintah						***Government bonds***
Diukur pada nilai wajar melalui laba rugi	3.265.550	-	-	-	3.265.550	*Fair value through profit -or-loss*
Diukur pada nilai wajar melalui penghasilan komprehensif lain	14.109.049	-	-	-	14.109.049	*Financial assets held at fair value through other comprehensive income*
Diukur pada biaya perolehan amortisasi	18.100.930	-	-	-	18.100.930	*Amortized cost*
Lain-lain						***Others***
Giro pada bank Indonesia	22.739.920	-	-	-	22.739.920	*Current accounts with Bank Indonesia*
Giro pada bank lain	5.949.997	-	-	1.749	5.951.746	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	4.661.104	-	-	-	4.661.104	*Placements with Bank Indonesia and other banks*
Tagihan Akseptasi	941.898	-	-	-	941.898	*Acceptance Receivable*
Tagihan Derivatif	102.843	-	-	-	102.843	*Derivative Receivable*
Kredit yang diberikan dan piutang/ pembiayaan syariah						*Loans and sharia financing/ receivables*
Konsumer						*Consumer*
Pemilikan rumah	96.081.803	155.611.500	21.762.388	6.475.325	279.931.016	*Housing loan*
Non kepemilikan rumah	1.365.214	11.964.101	720.988	473.910	14.524.213	*Non-housing loan*
Modal kerja	2.584.151	23.334.976	392.359	10.416.394	36.727.880	*Working capital*
Investasi	2.295.722	9.663.097	28.177	5.206.386	17.193.382	*Investment*
Sindikasi	2.034.573	5.751.155	-		7.785.728	*Syndicated*
Direksi dan karyawan						*Directors and employees*
- Pihak ketiga	951.300	771.457	5.497	10.954	1.739.208	*Third parties -*
- Pihak yang berelasi	42.233	29.272	-	-	71.505	*Related parties -*
Bunga yang masih akan diterima	11.518.574	-	-	-	11.518.574	*Interests receivable*
Aset lain-lain[*)]	1.781.884	-	-	-	1.781.884	*Other assets*[*)]
Total	**213.889.368**	**207.125.558**	**22.909.409**	**22.585.505**	**466.509.840**	***Total***
Cadangan kerugian nilai					(13.062.532)	*Allowance for impairment losses*
Neto					**453.447.308**	***Net***

*) Terdiri atas tagihan kepada pihak ketiga
**) Tidak diaudit
***) Terdiri dari kolektibilitas 3, 4 dan 5 dan kredit yang cadangan kerugian penurunan nilainya dinilai secara individual, termasuk piutang/pembiayaan syariah dengan hari tunggakan diatas 270 hari

**) Consists of third party receivables*
***) Unaudited*
****) Consist of collectibility 3, 4, and 5 and credit with allowance for impairment losses individually assessed, including sharia financing/receivables with day past due 270 days*

45. MANAJEMEN RISIKO (lanjutan)

Risiko Kredit (lanjutan)

(iv) Tabel di bawah menunjukkan kualitas aset keuangan berdasarkan golongan aset untuk semua aset keuangan yang mempunyai risiko kredit (diluar cadangan kerugian penurunan nilai bruto): (lanjutan)

45. RISK MANAGEMENT (continued)

Credit Risk (continued)

(iv) The tables below shows the quality of financial assets by class of assets for all financial assets with credit risk (gross of allowance for impairment losses): (continued)

	31 Desember/*December 31*, 2023					
	Belum jatuh tempo dan tidak mengalami penurunan nilai/*neither past due nor impaired*		Jatuh tempo dan tidak mengalami penurunan nilai/ *Past due but not Impaired*	Mengalami penurunan nilai/ *Impaired*[***)]	Total	
	Tingkat tinggi/ *High Grade*[**)]	Tingkat standar/ *Standard grade*[**)]				
Efek-efek						***Securities***
Diukur pada nilai wajar melalui laporan laba rugi	1.042.013	-	-	-	1.042.013	*Fair value through profit -or-loss*
Diukur pada nilai wajar melalui penghasilan komprehensif lain	1.928.336	-	-	-	1.928.336	*Financial assets held at fair value through other comprehensive income*
Diukur pada biaya perolehan amortisasi	2.335.524	-	-	-	2.335.524	*Amortized cost*
Obligasi pemerintah						***Government bonds***
Diukur pada nilai wajar melalui laba rugi	3.796.440	-	-	-	3.796.440	*Fair value through profit -or-loss*
Diukur pada nilai wajar melalui penghasilan komprehensif lain	12.511.991	-	-	-	12.511.991	*Financial assets held at fair value through other comprehensive income*
Diukur pada biaya perolehan amortisasi	19.585.498	-	-	-	19.585.498	*Amortized cost*
Lain-lain						***Others***
Giro pada bank Indonesia	18.145.761	-	-	-	18.145.761	*Current accounts with Bank Indonesia*
Giro pada bank lain	2.201.620	-	-	1.778	2.203.398	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	30.561.122	-	-	-	30.561.122	*Placements with Bank Indonesia and other banks*
Tagihan Akseptasi	544.567	-	-	-	544.567	*Acceptance Receivable*
Tagihan Derivatif	32.176	-	-	-	32.176	*Derivative Receivable*
Kredit yang diberikan dan piutang/ pembiayaan syariah						*Loans and sharia financing/ receivables*
Konsumer						*Consumer*
Pemilikan rumah	101.324.869	135.794.934	16.884.060	4.067.018	258.070.881	*Housing loan*
Non kepemilikan rumah	1.808.716	10.021.561	805.808	370.496	13.006.581	*Non-housing loan*
Modal kerja	3.213.787	22.252.701	711.771	11.781.870	37.960.129	*Working capital*
Investasi	123.007	9.606.196	44.474	5.758.330	15.532.007	*Investment*
Sindikasi	46.911	7.103.450	-	-	7.150.361	*Syndicated*
Direksi dan karyawan						*Directors and employees*
- Pihak ketiga	1.131.978	729.456	7.472	24.726	1.893.632	*Third parties -*
- Pihak yang berelasi	53.307	31.243	-	-	84.550	*Related parties -*
Bunga yang masih akan diterima	11.526.687	-	-	-	11.526.687	*Interests receivable*
Aset lain-lain[*)]	1.873.496	-	-	-	1.873.496	*Other assets*[*)]
Total	**213.787.806**	**185.539.541**	**18.453.585**	**22.004.218**	**439.785.150**	***Total***
Cadangan kerugian nilai					(15.640.547)	*Allowance for impairment losses*
Neto					**424.144.603**	***Net***

*) Terdiri atas tagihan kepada pihak ketiga
**) Tidak diaudit
***) Terdiri dari kolektibilitas 3, 4 dan 5 dan kredit yang cadangan kerugian penurunan nilainya dinilai secara individual, termasuk piutang/pembiayaan syariah dengan hari tunggakan diatas 270 hari

**) Consists of third party receivables*
***) Unaudited*
****) Consist of collectibility 3, 4, and 5 and credit with allowance for impairment losses individually assessed, including sharia financing/receivables with day past due 270 days*

45. MANAJEMEN RISIKO (lanjutan)

45. *RISK MANAGEMENT (continued)*

Risiko Kredit (lanjutan)

Credit Risk (continued)

(iv) Tabel di bawah menunjukkan kualitas aset keuangan berdasarkan golongan aset untuk semua aset keuangan yang mempunyai risiko kredit (diluar cadangan kerugian penurunan nilai bruto) (lanjutan):

(iv) The tables below shows the quality of financial assets by class of assets for all financial assets with credit risk (gross of allowance for impairment losses) (continued):

	31 Desember/*December 31*, 2022					
	Belum jatuh tempo dan tidak mengalami penurunan nilai/*neither past due nor impaired*		Jatuh tempo dan tidak mengalami penurunan nilai/ *Past due but not Impaired*	Mengalami penurunan nilai/ *Impaired***	Total	
	Tingkat tinggi/ *High Grade***	Tingkat standar/ *Standard grade***				
Efek-efek						***Securities***
Diukur pada nilai wajar melalui laporan laba rugi	793.831	-	-	-	793.831	*Fair value through profit -or-loss*
Diukur pada nilai wajar melalui penghasilan komprehensif lain	655.293	-	-	-	655.293	*Financial assets held at fair value through other comprehensive income*
Diukur pada biaya perolehan amortisasi	272.044	-	-	2.000	274.044	*Amortized cost*
Obligasi pemerintah						***Government bonds***
Diukur pada nilai wajar melalui laba rugi	19.591.199	-	-	-	19.591.199	*Fair value through profit -or-loss*
Diukur pada nilai wajar melalui penghasilan komprehensif lain	14.332.949	-	-	-	14.332.949	*Financial assets held at fair value through other comprehensive income*
Diukur pada biaya perolehan amortisasi	18.040.825	-	-	-	18.040.825	*Amortized cost*
Lain-lain						***Others***
Giro pada bank Indonesia	25.416.941	-	-	-	25.416.941	*Current accounts with Bank Indonesia*
Giro pada bank lain	1.470.526	-	-	1.731	1.472.257	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	12.975.955	-	-	-	12.975.955	*Placements with Bank Indonesia and other banks*
Tagihan Akseptasi	420.562	-	-	-	420.562	*Acceptance Receivable*
Efek-efek yang Dibeli dengan janji dijual kembali	1.434.190	-	-	-	1.434.190	*Securities purchased under agreement to resell*
Tagihan Derivatif	103.939	-	-	-	103.939	*Derivative Receivable*
Kredit yang diberikan dan piutang/ pembiayaan syariah						*Loans and sharia financing/ receivables*
Konsumer						*Consumer*
Pemilikan rumah	106.290.471	109.503.902	15.481.718	2.610.963	233.887.054	*Housing loan*
Non kepemilikan rumah	2.560.043	8.260.912	650.143	218.560	11.689.658	*Non-housing loan*
Modal kerja	5.987.718	17.130.097	1.162.221	10.175.647	34.455.683	*Working capital*
Investasi	3.397.768	2.863.506	155.160	5.227.188	11.643.622	*Investment*
Sindikasi	2.055.846	2.448.398	-	-	4.504.244	*Syndicated*
Direksi dan karyawan						*Directors and employees*
- Pihak ketiga	1.331.455	653.854	10.891	11.880	2.008.080	*Third parties -*
- Pihak yang berelasi	72.047	20.553	655	108	93.363	*Related parties -*
Bunga yang masih akan diterima	10.750.302	-	-	-	10.750.302	*Interests receivable*
Aset lain-lain*)	1.040.048	-	-	-	1.040.048	*Other assets*)*
Total	**228.993.952**	**140.881.222**	**17.460.788**	**18.248.077**	**405.584.039**	***Total***
Cadangan kerugian nilai					(15.674.205)	*Allowance for impairment losses*
Neto					**389.909.834**	***Net***

*) Terdiri atas tagihan kepada pihak ketiga
**) Tidak diaudit
***) Terdiri dari kolektibilitas 3, 4 dan 5 dan kredit yang cadangan kerugian penurunan nilainya dinilai secara individual, termasuk piutang/pembiayaan syariah dengan hari tunggakan diatas 270 hari

**) Consists of third party receivables*
***) Unaudited*
****) Consist of collectibility 3, 4, and 5 and credit with allowance for impairment losses individually assessed, including sharia financing/receivables with day past due 270 days*

45. MANAJEMEN RISIKO (lanjutan)

Risiko Kredit (lanjutan)

(iv) Tabel di bawah menunjukkan kualitas aset keuangan berdasarkan golongan aset untuk semua aset keuangan yang mempunyai risiko kredit (cadangan kerugian penurunan nilai bruto) (lanjutan):

Kualitas kredit didefinisikan sebagai berikut:

Tingkat tinggi

(a) Giro pada Bank Indonesia, giro pada bank lain, penempatan pada Bank Indonesia dan bank lain yaitu giro atau penempatan pada institusi Pemerintah, transaksi dengan bank yang memiliki reputasi baik dengan tingkat kemungkinan gagal bayar atas kewajiban yang rendah.

(b) Kredit yang diberikan dan piutang/ pembiayaan syariah, bunga yang masih akan diterima, dan tagihan kepada pihak ketiga yaitu debitur dengan riwayat pembayaran yang sangat baik dan tidak pernah menunggak sepanjang jangka waktu kredit.

(c) Efek-efek dan obligasi pemerintah yaitu efek-efek yang dikeluarkan oleh Pemerintah RI, efek-efek dan obligasi yang termasuk dalam investment grade dengan rating minimal BBB- (Pefindo) atau Baa3 (Moody's).

Tingkat standar

(a) Giro pada Bank Indonesia, giro pada bank lain, penempatan pada Bank Indonesia dan bank lain yaitu giro atau penempatan pada bank lokal yang tidak terdaftar di bursa.

(b) Kredit yang diberikan dan piutang/ pembiayaan syariah, bunga yang masih akan diterima, dan tagihan kepada pihak ketiga yaitu debitur dengan riwayat pembayaran yang baik dan tidak pernah menunggak 90 hari atau lebih.

(c) Efek-efek dan obligasi Pemerintah yaitu efek-efek dan obligasi dengan rating antara idBB+ sampai dengan idB (Pefindo) atau Ba1 sampai dengan B2 (Moody's).

45. RISK MANAGEMENT (continued)

Credit Risk (continued)

(iv) The tables below shows the quality of financial assets by class of assets for all financial assets with credit risk (gross of allowance for impairment losses) (continued):

The credit quality is defined as follows:

High grade

(a) Current accounts with Bank Indonesia, current accounts with other banks, placements with Bank Indonesia and other banks are current accounts or placements with government institution, transaction with reputable banks with low probability of default for its liabilities.

(b) Loans and sharia financing/receivables, interests receivables and third party receivables are receivables from borrowers with very satisfactory track record of loan repayment and whose accounts did not turn past due during the term of the loan.

(c) Securities and government bonds are Sovereign securities issued by government of RI, investment grade securities and bonds with a rating of at least BBB- (Pefindo) or Baa3 (Moody's).

Standard grade

(a) Current accounts with Bank Indonesia, current accounts with other banks, placements with Bank Indonesia and other banks are current accounts or placements with the local banks not listed in the stock exchange.

(b) Loans and sharia financing/receivables, interests receivables and third party receivables are receivables from borrowers who have an average track record of loan repayment and whose account did not turn past due for 90 days.

(c) Securities and Government bonds with a rating between idBB+ to idB (Pefindo) or Ba1 to B2 (Moody's).

45. MANAJEMEN RISIKO (lanjutan)

Risiko Kredit (lanjutan)

(v) Analisis umur pinjaman yang jatuh tempo tetapi tidak mengalami penurunan nilai pada tanggal 31 Desember 2024, 2023 dan 2022, sebagai berikut:

45. RISK MANAGEMENT (continued)

Credit Risk (continued)

(v) The aging analysis of past due but not impaired loans as of December 31, 2024, 2023 and 2022, follows:

31 Desember/*December 31*, 2024

	1 sampai 90 hari/ *1 to 90 days*	91 sampai 120 hari/ *91 to 120 days*	121 sampai 180 hari/ *121 to 180 days*	180 sampai 270 hari/ *180 to 270 days*	Total	
Konsumer						*Consumer*
Pemilikan rumah	18.743.567	519.457	1.262.031	1.237.333	21.762.388	*Housing Loan*
Non kepemilikan rumah	718.859	886	1.243	-	720.988	*Non housing loan*
Modal kerja	392.359	-	-	-	392.359	*Working capital*
Investasi	28.177	-	-	-	28.177	*Investment*
Direktur dan karyawan	5.497	-	-	-	5.497	*Directors and employees*
Total	**19.888.459**	**520.343**	**1.263.274**	**1.237.333**	**22.909.409**	***Total***
Cadangan kerugian nilai					(2.059.095)	*Allowance for impairment losses*
Neto					**20.850.314**	***Net***

31 Desember/*December 31*, 2023

	1 sampai 90 hari/ *1 to 90 days*	91 sampai 120 hari/ *91 to 120 days*	121 sampai 180 hari/ *121 to 180 days*	180 sampai 270 hari/ *180 to 270 days*	Total	
Konsumer						*Consumer*
Pemilikan rumah	14.498.880	469.405	1.030.681	885.094	16.884.060	*Housing Loan*
Non kepemilikan rumah	803.340	1.013	1.455	-	805.808	*Non housing loan*
Modal kerja	711.771	-	-	-	711.771	*Working capital*
Investasi	44.474	-	-	-	44.474	*Investment*
Direktur dan karyawan	7.472	-	-	-	7.472	*Directors and employees*
Total	**16.065.937**	**470.418**	**1.032.136**	**885.094**	**18.453.585**	***Total***
Cadangan kerugian nilai					(2.018.432)	*Allowance for impairment losses*
Neto					**16.435.153**	***Net***

31 Desember/*December 31*, 2022

	1 sampai 90 hari/ *1 to 90 days*	91 sampai 120 hari/ *91 to 120 days*	121 sampai 180 hari/ *121 to 180 days*	180 sampai 270 hari/ *180 to 270 days*	Total	
Konsumer						*Consumer*
Pemilikan rumah	13.190.989	384.038	1.021.398	885.293	15.481.718	*Housing Loan*
Non kepemilikan rumah	613.666	638	14.288	21.551	650.143	*Non housing loan*
Modal kerja	719.359	-	12.786	430.076	1.162.221	*Working capital*
Investasi	81.655	-	1.191	72.314	155.160	*Investment*
Direktur dan karyawan	9.513	-	851	1.182	11.546	*Directors and employees*
Total	**14.615.182**	**384.676**	**1.050.514**	**1.410.416**	**17.460.788**	***Total***
Cadangan kerugian nilai					(1.918.975)	*Allowance for impairment losses*
Neto					**15.541.813**	***Net***

45. MANAJEMEN RISIKO (lanjutan)

45. RISK MANAGEMENT (continued)

Risiko Kredit (lanjutan)

Credit Risk (continued)

(vi) Mutasi cadangan berdasarkan jenis kredit yang diberikan adalah sebagai berikut:

(vi) Movements in allowance for imparment losses by type of loans are as follows:

31 Desember/*December 31,* 2024

	Konsumsi/Konsumer							
	Pemilikan Rumah/ *Housing Loan*	**Non-kepemilikan Rumah/ *Non-Housing Loan***	**Modal Kerja/ *Working Capital***	**Investasi/ *Investment***	**Sindikasi/ *Syndicated***	**Direksi dan Karyawan/ *Directors and Employee***	**Total**	
Saldo Awal	**6.910.527**	**280.331**	**6.767.137**	**1.575.398**	**22.373**	**36.198**	**15.591.964**	***Beginning balance***
Penyisihan kerugian penurunan nilai selama tahun berjalan	2.234.326	224.249	(1.140.566)	(528.988)	45.643	12.853	847.517	*Provision for impairment losses during the year*
Penerimaan kembali kredit yang telah dihapus-bukukan	29.353	2.313	46.002	4.801	-	-	82.469	*Recovery of loans written-off*
Penghapusbukuan kredit	(1.772.530)	(195.814)	(1.328.762)	(140.590)	-	(27.067)	(3.464.763)	*Loans written-off*
Saldo akhir tahun	**7.401.676**	**311.079**	**4.343.811**	**910.621**	**68.016**	**21.984**	**13.057.187**	***Balance at the end of year***
Penurunan nilai individual	47.476	2.657	2.911.270	647.044	-	10.254	3.618.701	*Individual impairment*
Penurunan nilai kolektif	7.354.200	308.422	1.432.541	263.577	68.016	11.730	9.438.486	*Collective impairment*
Jumlah kotor kredit yang secara individu ditentukan sebagai mengalami penurunan nilai sebelum dikurangi kerugian penurunan nilai atas penilaian secara individual	50.090	2.688	8.492.193	4.910.647	-	8.924	13.464.542	*Gross amount of loans individually determined to be impaired. before deducting any individually assessed impairment losses*

31 Desember/*December 31,* 2023

	Konsumsi/Konsumer							
	Pemilikan Rumah/ *Housing Loan*	**Non-kepemilikan Rumah/ *Non-Housing Loan***	**Modal Kerja/ *Working Capital***	**Investasi/ *Investment***	**Sindikasi/ *Syndicated***	**Direksi dan Karyawan/ *Directors and Employee***	**Total**	
Saldo Awal	**6.364.735**	**264.372**	**7.490.645**	**1.526.614**	**15.493**	**13.064**	**15.674.923**	***Beginning balance***
Penyisihan kerugian penurunan nilai selama tahun berjalan	1.917.338	182.897	643.587	125.307	6.880	31.835	2.907.844	*Provision for impairment losses during the year*
Penerimaan kembali kredit yang telah dihapus-bukukan	17.442	3.867	44.098	11.658	-	-	77.065	*Recovery of loans written-off*
Penghapusbukuan kredit	(1.388.988)	(170.805)	(1.411.193)	(88.181)	-	(8.701)	(3.067.868)	*Loans written-off*
Saldo akhir tahun	**6.910.527**	**280.331**	**6.767.137**	**1.575.398**	**22.373**	**36.198**	**15.591.964**	***Balance at the end of year***
Penurunan nilai individual	597.521	31.471	5.134.111	1.390.288	-	4.182	7.157.573	*Individual impairment*
Penurunan nilai kolektif	6.313.006	248.860	1.633.026	185.110	22.373	32.016	8.434.391	*Collective impairment*
Jumlah kotor kredit yang secara individu ditentukan sebagai mengalami penurunan nilai sebelum dikurangi kerugian penurunan nilai atas penilaian secara individual	621.615	33.934	9.696.781	5.455.467	-	3.815	15.811.612	*Gross amount of loans individually determined to be impaired. before deducting any individually assessed impairment losses*

45. MANAJEMEN RISIKO (lanjutan)

45. RISK MANAGEMENT (continued)

Risiko Kredit (lanjutan)

Credit Risk (continued)

(vi) Mutasi cadangan berdasarkan jenis kredit yang diberikan adalah sebagai berikut: (lanjutan)

(vi) Movements in allowance for imparment losses by type of loans are as follows: (continued)

	31 Desember/*December 31,* 2022							
	Konsumsi/Konsumer							
	Pemilikan Rumah/ *Housing Loan*	Non-kepemilikan Rumah/ *Non-Housing Loan*	Modal Kerja/ *Working Capital*	Investasi/ *Investment*	Sindikasi/ *Syndicated*	Direksi dan Karyawan/ *Directors and Employee*	Total	
Saldo Awal	**4.296.939**	**309.075**	**8.485.819**	**1.302.032**	**7.618**	**34.277**	**14.435.760**	***Beginning balance***
Penyisihan kerugian penurunan nilai selama tahun berjalan	3.420.001	69.993	38.379	495.348	7.875	7.911	4.039.507	*Provision for impairment losses during the year*
Penerimaan kembali kredit yang telah dihapus-bukukan	11.764	3.838	49.698	6.416	-	-	71.716	*Recovery of loans written-off*
Penghapusbukuan kredit	(1.363.969)	(118.534)	(1.083.251)	(277.182)	-	(29.124)	(2.872.060)	*Loans written-off*
Saldo akhir tahun	**6.364.735**	**264.372**	**7.490.645**	**1.526.614**	**15.493**	**13.064**	**15.674.923**	***Balance at the end of year***
Penurunan nilai individual	889.594	86.221	4.902.353	1.331.382	-	1.229	7.210.779	*Individual impairment*
Penurunan nilai kolektif	5.475.141	178.151	2.588.292	195.232	15.493	11.835	8.464.144	*Collective impairment*
Jumlah kotor kredit yang secara individu ditentukan sebagai mengalami penurunan nilai sebelum dikurangi kerugian penurunan nilai atas penilaian secara individual	893.068	85.794	8.057.392	5.078.192	-	1.108	14.115.554	*Gross amount of loans individually determined to be impaired. before deducting any individually assessed impairment losses*

Risiko Likuiditas

Risiko Likuiditas merupakan risiko akibat ketidakmampuan Bank untuk 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, transaksi antar Bank, dan pinjaman yang diterima.

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, among others, 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, inter-bank transactions and fund borrowings.

45. MANAJEMEN RISIKO (lanjutan)

Risiko Likuiditas (lanjutan)

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 finansial 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, Prosedur dan Penetapan Limit 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 *Internal Audit Division (*IAD) dan *Enterprise Risk Management Division* (ERMD).

Pengendalian risiko likuiditas melalui strategi pendanaan, pengelolaan posisi likuiditas dan pemantauan risiko likuiditas harian, pengelolaan aset likuid yang berkualitas tinggi, dan rencana pendanaan darurat serta penerapan sistem informasi manajemen risiko secara wajar untuk mendukung pelaksanaan proses identifikasi, pengukuran, pemantauan, dan pengendalian, serta pelaporan risiko likuiditas dalam kondisi normal dan kondisi krisis secara lengkap, akurat, terkini dan berkesinambungan.

Alat pengukuran yang digunakan dalam pengukuran Risiko Likuiditas antara lain adalah Rasio Likuiditas, Profil Maturitas, Proyeksi Arus Kas, dan *Stress Testing* (pengujian terhadap kemampuan Bank untuk memenuhi kebutuhan likuiditas pada kondisi krisis dengan menggunakan skenario *stress* secara spesifik pada Bank maupun skenario *stress* pada faktor pasar).

45. RISK MANAGEMENT (continued)

Liquidity Risk (continued)

In general, the main objective of risk management for liquidity risk is to minimize the possibility of the Bank's inability to obtain source of cash flow funding. Thus, the Bank can meet some financial obligations that have been agreed upon in a timely manner, and to always be able to maintain adequate and optimal levels of liquidity. Liquidity risk management policies include the active supervision of the Board Of Commisioners and Board Of Directors who basically set the implementation of the Bank's liquidity risk management, policy, procedures and determination of limits, which generally includes the liquidity risk management strategy, level of risk to be taken (risk appetite) and risk tolerance, and risk management process, information systems and internal control systems by implementing internal controls and adequate independent review of the risk management implementation for liquidity risk which are being carried out by the Management and conducted by the Internal Audit Division (IAD) and Enterprise Risk Management Division (ERMD).

Liquidity risk management is being carried out through funding strategy, liquidity positions and monitoring of daily liquidity, management of high quality liquid assets, planning the emergency funding as well as implementation of a sound risk management information system to support the process of identification, measurement, monitoring and control, as well as reporting of liquidity risk under normal and extreme conditions in a comprehensive, accurate, timely and sustainable manner.

The tools used in the measurement of liquidity risk among others are Liquidity Ratio, Maturity Profile, Cash Flow Projection, and Stress Testing (testing the Bank's ability to meet liquidity needs on a state of crisis by using the specific stress scenarios on the Bank as well as on the market factor).

45. MANAJEMEN RISIKO (lanjutan)

Risiko Likuiditas (lanjutan)

Tabel jatuh tempo berikut menyajikan informasi mengenai perkiraan sisa jatuh tempo dari aset dan liabilitas keuangan:

45. RISK MANAGEMENT (continued)

Liquidity Risk (continued)

The following maturity tables provide information about the expected maturities of the Bank's financial assets and liabilities:

	31 Desember/*December 31*, 2024						
	Total	**Lainnya/ *Others *)***	**≤ 1 Bulan/ *≤ 1 Month***	**> 1 - 6 Bulan/ *Months***	**> 6 - 12 Bulan/ *>6 - 12 Months***	**> 12 Bulan/ *>12 Months***	
ASET							***ASSETS***
Kas	2.105.620	-	2.105.620	-	-	-	*Cash*
Giro pada Bank Indonesia	22.739.920	-	22.739.920	-	-	-	*Current accounts with Bank Indonesia*
Giro pada bank lain	5.949.175	(2.571)	5.951.746	-	-	-	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	4.661.104	-	4.661.104	-	-	-	*Placements with Bank Indonesia and other banks*
Efek-efek	25.362.623	(787)	6.858.084	7.992.795	4.516.767	5.995.764	*Securities*
Obligasi Pemerintah	35.475.529	-	9.056.220	3.379.524	1.294.839	21.744.946	*Government bonds*
Efek-efek yang Dibeli Dengan Janji Dijual Kembali	175.625	-	175.625	-	-	-	*Securities Purchased under Agreement to Resell*
Tagihan Akseptasi	939.911	(1.987)	941.898	-	-	-	*Acceptance Receivable*
Tagihan Derivatif	102.843	-	102.843	-	-	-	*Derivative Receivables*
Kredit yang diberikan dan pembiayaan/piutang syariah	344.915.745	(13.057.187)	2.209.265	7.280.870	6.193.238	342.289.559	*Loans and sharia financing/receivables*
Bunga yang masih akan diterima	11.518.574	-	11.518.574	-	-	-	*Interest receivable*
Aset lain-lain**)	1.781.884	-	1.781.884	-	-	-	*Other assets**)*
Total	**455.728.553**	**(13.062.532)**	**68.102.783**	**18.653.189**	**12.004.844**	**370.030.269**	***Total***
LIABILITAS							***LIABILITIES***
Liabilitas segera ***)	2.258.154	-	2.258.154	-	-	-	*Liabilities due immediately***)*
Simpanan nasabah	352.437.480	-	244.316.185	104.484.549	3.588.478	48.268	*Deposits from customers*
Simpanan dari bank lain	70.035	-	70.035		-	-	*Deposits from other banks*
Surat berharga yang diterbitkan	5.444.524	-		599.620	995.934	3.848.970	*Securities issued*
Liabilitas akseptasi	941.898	-	941.898	-	-	-	*Acceptance payable*
Liabilitas Derivatif		-		-	-	-	*Derivative payable*
Pinjaman yang diterima	33.485.084	-		4.419.676	7.000.000	22.065.408	*Fund borrowings*
Bunga yang masih harus dibayar	658.070	-	658.070	-	-	-	*Interest payables*
Liabilitas lain-lain****)	313.931	-	313.931	-	-	-	*Other liabilities****)*
Pinjaman dan efek-efek subordinasi	6.328.105	-	4.828.105	-	-	1.500.000	*Subordinated Loan and Securities*
Total	**401.937.281**	**-**	**253.386.378**	**109.503.845**	**11.584.412**	**27.462.646**	***Total***
Perbedaan jatuh tempo	**53.791.272**	**(13.062.532)**	**(185.283.595)**	**(90.850.656)**	**(420.432)**	**342.567.623**	***Maturity gap***

*) Cadangan kerugian penurunan nilai atas aset keuangan.
**) Terdiri atas tagihan pihak ketiga.
***) Terdiri atas kewajiban kepada pihak ketiga, bagi hasil yang belum dibagikan, deposito berjangka jatuh tempo dan bunga atas deposito berjangka namun belum diambil nasabah.
****) Terdiri atas setoran jaminan dan dana jaminan pengembang (kewajiban kepada pihak ketiga).

*) *Allowance for impairment losses on financial assets.*
**) *Consists of third party receivables.*
***) *Consists of third party payables, undistributed profit sharing, matured time deposits and interest on time deposits not collected by customers.*
****) *Consists of guarantee deposits and developers' security deposits (liabilities to third party).*

45. MANAJEMEN RISIKO (lanjutan)

Risiko Likuiditas (lanjutan)

Tabel jatuh tempo berikut menyajikan informasi mengenai perkiraan sisa jatuh tempo dari aset dan liabilitas keuangan (lanjutan):

45. RISK MANAGEMENT (continued)

Liquidity Risk (continued)

The following maturity tables provide information about the expected maturities of the Bank's financial assets and liabilities (continued):

	31 Desember/*December 31,* 2023						
	Total	**Lainnya/ *Others *)***	**≤ 1 Bulan/ *≤ 1 Month***	**> 1 - 6 Bulan/ *Months***	**> 6 - 12 Bulan/ *>6 - 12 Months***	**> 12 Bulan/ *>12 Months***	
ASET							***ASSETS***
Kas	2.127.489	-	2.127.489	-	-	-	*Cash*
Giro pada Bank Indonesia	18.145.761	-	18.145.761	-	-	-	*Current accounts with Bank Indonesia*
Giro pada bank lain	2.201.594	(1.804)	2.203.398	-	-	-	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	30.561.122	-	30.561.122	-	-	-	*Placements with Bank Indonesia and other banks*
Efek-efek	5.282.970	(22.903)	2.979.680	389.173	50.000	1.887.020	*Securities*
Obligasi Pemerintah	35.893.929	-	7.777.100	3.644.949	1.339.247	23.132.633	*Government bonds*
Tagihan Akseptasi	520.691	(23.876)	544.567	-	-	-	*Acceptance Receivable*
Tagihan Derivatif	32.176	-	-	-	-	32.176	*Derivative Receivables*
Kredit yang diberikan dan pembiayaan/piutang syariah	318.106.177	(15.591.964)	4.924.164	3.585.313	6.396.209	318.792.455	*Loans and sharia financing/receivables*
Bunga yang masih akan diterima	11.526.687	-	11.526.687	-	-	-	*Interest receivable*
Aset lain-lain**)	1.873.496	-	1.873.496	-	-	-	*Other assets**)*
Total	**426.272.092**	**(15.640.547)**	**82.663.464**	**7.619.435**	**7.785.456**	**343.844.284**	***Total***
LIABILITAS							***LIABILITIES***
Liabilitas segera ***)	2.567.271	-	2.567.271	-	-	-	*Liabilities due immediately***)*
Simpanan nasabah	322.501.148	-	225.525.422	78.653.684	18.036.635	285.407	*Deposits from customers*
Simpanan dari bank lain	91.312	-	91.312	-	-	-	*Deposits from other banks*
Surat berharga yang diterbitkan	8.272.098	-	-	1.698.524	1.811.017	4.762.557	*Securities issued*
Liabilitas akseptasi	544.567	-	362.394	182.173	-	-	*Acceptance payable*
Liabilitas Derivatif	-	-	-	-	-	-	*Derivative payable*
Pinjaman yang diterima	33.762.089	-	-	6.139.851	6.454.998	21.167.240	*Fund borrowings*
Bunga yang masih harus dibayar	647.496	-	647.496	-	-	-	*Interest payables*
Liabilitas lain-lain****)	521.548	-	521.548	-	-	-	*Other liabilities****)*
Pinjaman dan efek-efek subordinasi	9.112.837	-	-	-	-	9.112.837	*Subordinated Loan and Securities*
Total	**378.020.366**	**-**	**229.715.443**	**86.674.232**	**26.302.650**	**35.328.041**	***Total***
Perbedaan jatuh tempo	**48.251.726**	**(15.640.547)**	**(147.051.979)**	**(79.054.797)**	**(18.517.194)**	**308.516.243**	***Maturity gap***

*) Cadangan kerugian penurunan nilai atas aset keuangan.
**) Terdiri atas tagihan pihak ketiga.
***) Terdiri atas kewajiban kepada pihak ketiga, bagi hasil yang belum dibagikan, deposito berjangka jatuh tempo dan bunga atas deposito berjangka namun belum diambil nasabah.
****) Terdiri atas setoran jaminan dan dana jaminan pengembang (kewajiban kepada pihak ketiga).

*) *Allowance for impairment losses on financial assets.*
**) *Consists of third party receivables.*
***) *Consists of third party payables, undistributed profit sharing, matured time deposits and interest on time deposits not collected by customers.*
****) *Consists of guarantee deposits and developers' security deposits (liabilities to third party).*

45. MANAJEMEN RISIKO (lanjutan)

Risiko Likuiditas (lanjutan)

Tabel jatuh tempo berikut menyajikan informasi mengenai perkiraan sisa jatuh tempo dari aset dan liabilitas keuangan (lanjutan):

45. RISK MANAGEMENT (continued)

Liquidity Risk (continued)

The following maturity tables provide information about the expected maturities of the Bank's financial assets and liabilities (continued):

	31 Desember/*December 31*, 2022						
	Total	**Lainnya/ *Others *)***	**≤ 1 Bulan/ *≤ 1 Month***	**> 1 - 6 Bulan/ *Months***	**> 6 - 12 Bulan/ *>6 - 12 Months***	**> 12 Bulan/ *>12 Months***	
ASET							***ASSETS***
Kas	1.661.533	-	1.661.533	-	-	-	*Cash*
Giro pada Bank Indonesia	25.416.941	-	25.416.941	-	-	-	*Current accounts with Bank Indonesia*
Giro pada bank lain	1.470.510	(1.747)	1.472.257	-	-	-	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	12.975.955	-	12.975.955	-	-	-	*Placements with Bank Indonesia and other banks*
Efek-efek	1.720.769	(2.399)	1.455.405	8.260	82.165	177.338	*Securities*
Obligasi Pemerintah	51.964.973	-	37.540.672	3.266.511	512.540	10.645.250	*Government bonds*
Efek-efek yang dibeli dengan janji dijual kembali	1.434.190	-	1.434.190	-	-	-	*Securities purchased under agreement to resell*
Tagihan Akseptasi	420.426	(136)	80.697	339.865	-	-	*Acceptance Receivable*
Tagihan Derivatif	103.939	-	43.543	29.284	512.540	10.645.250	*Derivative Receivables*
Kredit yang diberikan dan pembiayaan/piutang syariah	282.606.781	(15.674.923)	5.336.769	4.811.050	5.887.466	282.246.419	*Loans and sharia financing/receivables*
Bunga yang masih akan diterima	10.750.302	-	10.750.302	-	-	-	*Interest receivable*
Aset lain-lain**)	1.040.048	-	1.040.048	-	-	-	*Other assets**)*
Total	**391.566.367**	**(15.679.205)**	**99.208.312**	**8.454.970**	**6.994.711**	**303.714.257**	***Total***
LIABILITAS							***LIABILITIES***
Liabilitas segera ***)	2.588.471	-	2.588.471	-	-	-	*Liabilities due immediately***)*
Simpanan nasabah	297.099.801	-	174.667.266	58.829.356	9.198.718	54.404.461	*Deposits from customers*
Simpanan dari bank lain	136.408	-	136.408	-	-	-	*Deposits from other banks*
Surat berharga yang diterbitkan	8.652.260	-	-	1.999.919	725.924	5.926.417	*Securities issued*
Liabilitas Derivatif	-	-	-	-	-	-	*Derivative Liabilities*
Liabilitas akseptasi	420.562	-	80.697	339.865	-	-	*Acceptance payable*
Pinjaman yang diterima	24.821.005	-	499.997	-	2.000.000	22.321.008	*Fund borrowings*
Bunga yang masih harus dibayar	629.366	-	629.366	-	-	-	*Interest payables*
Liabilitas lain-lain****)	4.690.821	-	4.690.821	-	-	-	*Other liabilities*****)*
Pinjaman dan efek-efek subordinasi	9.158.219	-	-	-	-	9.158.219	*Subordinated Loan and Securities*
Total	**348.196.913**	**-**	**183.293.026**	**61.169.140**	**11.924.642**	**91.810.105**	***Total***
Perbedaan jatuh tempo	**43.369.454**	**(15.679.205)**	**(84.084.714)**	**(52.714.170)**	**(4.929.931)**	**211.904.152**	***Maturity gap***

*) Cadangan kerugian penurunan nilai atas aset keuangan.
**) Terdiri atas tagihan pihak ketiga.
***) Terdiri atas kewajiban kepada pihak ketiga, bagi hasil yang belum dibagikan, deposito berjangka jatuh tempo dan bunga atas deposito berjangka namun belum diambil nasabah.
****) Terdiri atas setoran jaminan dan dana jaminan pengembang (kewajiban kepada pihak ketiga).

*) *Allowance for impairment losses on financial assets.*
**) *Consists of third party receivables.*
***) *Consists of third party payables, undistributed profit sharing, matured time deposits and interest on time deposits not collected by customers.*
****) *Consists of guarantee deposits and developers' security deposits (liabilities to third party).*

45. MANAJEMEN RISIKO (lanjutan)

Risiko Likuiditas (lanjutan)

Tabel di bawah ini menunjukkan sisa jatuh tempo kontraktual dari liabilitas keuangan berdasarkan pada arus kas yang tidak didiskonto (pokok dan bunga):

45. RISK MANAGEMENT (continued)

Liquidity Risk (continued)

The tables below show the remaining contractual maturities of financial liabilities based on undiscounted cashflows (principal and interest):

	31 Desember/*December 31*, 2024						
	Total	***On demand***	**≤ 1 Bulan/ *Month***	**> 1 - 6 Bulan/ *Months***	**> 6 - 12 Bulan/ *Months***	**> 12 Bulan/ *Months***	
LIABILITAS							***LIABILITIES***
Liabilitas segera*)	2.258.154	-	2.258.154	-	-	-	*Liabilities due immediately*)*
Simpanan nasabah							*Deposits from customers*
Deposito berjangka	154.945.003	-	75.218.809	78.557.079	1.148.552	20.563	*Time deposits*
Tabungan	39.222.081	39.222.081	-	-	-	-	*Savings deposits*
Giro	159.906.028	82.236.528	-	-	-	77.488.018	*Demand deposits*
Simpanan dari bank lain	70.035	70.035	-	-	-	-	*Deposits from other banks*
Liabilitas akseptasi	941.898	-	941.898	-	-	-	*Acceptance payable*
Liabiltias derivatif	-	-	-	-	-	-	*Derivative Liabilities*
Surat berharga yang diterbitkan	6.169.672	-	56.873	775.969	2.546.485	2.790.345	*Securities issued*
Pinjaman yang diterima	50.269.914	-	131.032	4.703.048	9.176.495	36.259.339	*Fund borrowings*
Bunga yang masih harus dibayar	658.070	-	658.070	-	-	-	*Interest payables*
Liabilitas lain-lain**)	313.931	-	313.931	-	-	-	*Other liabilities**)*
Pinjaman Subordinasi dan Efek-efek subordinasi	6.926.880	-	5.284.948	-	-	1.641.932	*Subordinated Loan and and securities*
Total	**421.681.666**	**121.528.644**	**84.863.715**	**84.036.096**	**12.871.532**	**118.200.197**	***Total***

	31 Desember/*December 31*, 2023						
	Total	***On demand***	**≤ 1 Bulan/ *Month***	**> 1 - 6 Bulan/ *Months***	**> 6 - 12 Bulan/ *Months***	**> 12 Bulan/ *Months***	
LIABILITAS							***LIABILITIES***
Liabilitas segera*)	2.567.271	-	2.567.271	-	-	-	*Liabilities due immediately*)*
Simpanan nasabah							*Deposits from customers*
Deposito berjangka	141.895.950	-	90.316.293	40.542.872	10.987.612	49.173	*Time deposits*
Tabungan	38.998.753	38.998.753	-	-	-	-	*Savings deposits*
Giro	142.808.756	78.489.050	-	-	-	64.319.706	*Demand deposits*
Simpanan dari bank lain	91.312	91.312		-	-	-	*Deposits from other banks*
Liabilitas akseptasi	544.567	-	544.567	-	-		*Acceptance payable*
Liabiltias derivatif	-	-	-	-	-	-	*Derivative Liabilities*
Surat berharga yang diterbitkan	9.453.602	-	75.426	1.935.160	2.085.568	5.357.448	*Securities issued*
Pinjaman yang diterima	43.613.659	-	125.750	6.751.324	8.120.580	28.616.005	*Fund borrowings*
Bunga yang masih harus dibayar	647.496	-	647.496	-	-	-	*Interest payables*
Liabilitas lain-lain**)	521.548	-	521.548	-	-	-	*Other liabilities**)*
Pinjaman Subordinasi dan Efek-efek subordinasi	9.825.769	-	47.979	239.897	3.287.876	6.250.017	*Subordinated Loan and and securities*
Total	**390.968.683**	**117.579.115**	**94.846.330**	**49.469.253**	**24.481.636**	**104.592.349**	***Total***

45. MANAJEMEN RISIKO (lanjutan)

Risiko Likuiditas (lanjutan)

Tabel di bawah ini menunjukkan sisa jatuh tempo kontraktual dari liabilitas keuangan berdasarkan pada arus kas yang tidak didiskonto (pokok dan bunga): (lanjutan)

45. RISK MANAGEMENT (continued)

Liquidity Risk (continued)

The tables below show the remaining contractual maturities of financial liabilities based on undiscounted cashflows (principal and interest): (continued)

	31 Desember/*December 31*, 2022						
	Total	***On demand***	**≤ 1 Bulan/ *Month***	**> 1 - 6 Bulan/ *Months***	**> 6 - 12 Bulan/ *Months***	**> 12 Bulan/ *Months***	
LIABILITAS							***LIABILITIES***
Liabilitas segera*)	2.588.471	-	2.588.471	-	-	-	*Liabilities due immediately*)*
Simpanan nasabah							*Deposits from customers*
Deposito berjangka	148.981.512	-	66.763.135	59.616.536	9.631.572	12.970.268	*Time deposits*
Tabungan	37.376.047	37.376.047	-	-	-	-	*Savings deposits*
Giro	113.525.727	70.664.584	-	-	-	42.861.143	*Demand deposits*
Simpanan dari bank lain	136.408	136.408	-	-	-	-	*Deposits from other banks*
Liabilitas derivatif	-	-	-	-	-	-	*Derivative liabilities*
Liabilitas akseptasi	420.562	-	80.697	339.865	-	-	*Acceptance payable*
Surat berharga yang diterbitkan	10.110.074	-	72.842	2.245.500	991.612	6.800.120	*Securities issued*
Pinjaman yang diterima	32.698.776	-	85.148	1.026.370	2.602.004	28.985.254	*Fund borrowings*
Bunga yang masih harus dibayar	629.366	-	629.366	-	-	-	*Interest payables*
Liabilitas lain-lain**)	4.690.821	-	4.690.821	-	-	-	*Other liabilities**)*
Pinjaman Subordinasi dan efek-efek subordinasi	10.562.334	-	48.158	240.792	288.950	9.984.434	*Subordinated Loan and securities*
Total	**361.720.098**	**108.177.039**	**74.958.638**	**63.469.063**	**13.514.138**	**101.601.219**	***Total***

*) Terdiri atas kewajiban kepada pihak ketiga, bagi hasil yang belum dibagikan, deposito berjangka jatuh tempo dan bunga atas deposito berjangka namun belum diambil nasabah.

**) Terdiri atas setoran jaminan dan dana jaminan pengembang (kewajiban kepada pihak ketiga).

*) *Consists of third party payables, undistributed profit sharing, matured time deposits and interest on time deposits not collected by customers.*

**) *Consists of guarantee deposits and developers' security deposits (liabilities to third party).*

Risiko Pasar

Risiko Pasar merupakan risiko pada laporan posisi keuangan dan rekening administratif, akibat perubahan secara keseluruhan dari kondisi pasar.

Market Risk

Market risk is the risk on statement of financial position and administrative accounts, due to changes in overall market conditions.

45. MANAJEMEN RISIKO (lanjutan)

Risiko Pasar (lanjutan)

Sesuai Surat Edaran Otoritas Jasa Keuangan Nomor 12 /SEOJK.03/2018 tanggal 21 Agustus 2018 tentang Penerapan Manajemen Risiko dan Pengukuran Risiko Pendekatan Standar, Bank menggunakan perhitungan *Standardized Method* yang digunakan untuk menghitung Kewajiban Penyediaan Modal Minimum (KPMM) untuk Risiko Pasar. Risiko nilai tukar yang timbul dari fluktuasi nilai tukar dikelola dengan cara menjaga Posisi Devisa Neto sesuai dengan peraturan Bank Indonesia. Gejolak eksternal juga diakomodasi dengan dilakukan *stress testing* untuk melihat sejauh mana Bank dapat bertahan dengan beberapa skenario perubahan kondisi eksternal, khususnya perubahan suku bunga pasar.

Termasuk di dalam risiko pasar adalah risiko perubahan harga instrumen keuangan akibat perubahan faktor-faktor pasar, seperti perubahan suku bunga dan perubahan nilai tukar.

i. Risiko tingkat suku bunga

Risiko tingkat bunga timbul dari adanya kemungkinan bahwa perubahan tingkat suku bunga akan mempengaruhi arus kas di masa yang akan datang dari nilai wajar instrumen keuangan.

Tabel di bawah ini menyajikan informasi mengenai tingkat suku bunga rata-rata per tahun untuk aset dan liabilitas keuangan yang penting untuk tahun yang berakhir pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022:

45. RISK MANAGEMENT (continued)

Market Risk (continued)

In accordance with the Financial Services Authority Circular No.12 /SEOJK.03/2018 dated in August 21, 2018 regarding the Implementation of Risk Management and Measurement of Risk in the Standard Approach In measuring market risk, the Bank uses the Standardized Method in calculating minimum Capital Adequacy Ratio (CAR) for market risk. Exchange rate risk arises from fluctuations in exchange rates maintained by keeping the net open position in accordance with Bank Indonesia regulations. External shocks are also being considered by stress testing, which is done to measure the extent to which the Bank can survive some scenario changes in external conditions, particularly changes in market interest rates.

Market risk includes the risk of price changes of financial instruments due to changes in market factors, such as changes in interest rates and exchange rates.

i. Interest rate risk

Interest rate risks arise from the possibility that changes in interest rates will affect future cash flows from the fair values of financial instruments.

The following table presents information on the average annual interest rates for significant financial assets and liabilities for the year ended December 31,2024, 2023 and 2022:

	31 Desember/*December 31,* 2024		31 Desember/*December 31,* 2023		31 Desember/*December 31,* 2022		
Aset	**Rupiah**	**Mata Uang Asing/ *Foreign currencies***	**Rupiah**	**Mata Uang Asing/ *Foreign currencies***	**Rupiah**	**Mata Uang Asing/ *Foreign currencies***	***Assets***
Giro pada bank lain	0,78%	0,00%	0,69%	0,00%	0,19%	0,00%	*Current accounts with other Bank*
Penempatan pada Bank Indonesia dan bank lain	5,47%	5,27%	5,23%	5,24%	3,47%	0,96%	*Placements with Bank Indonesia and other banks*
Efek-efek	2,96%	4,12%	5,27%	4,13%	8,59%	4,13%	*Securities*
Obligasi pemerintah							*Government bonds*
Tingkat bunga tetap	5,87%	4,02%	3,74%	3,07%	3,60%	2,93%	*Fixed interest rate*
Efek-efek yang dibeli dengan janji dijual kembali	6,18%	0,0%	5,74%	0,00%	4,21%	0,00%	*Securities purchased under agreement to resell*
Kredit yang diberikan dan Piutang syariah	8,18%	6,43%	8,06%	6,08%	8,14%	4,48%	*Loans and sharia financing/ receivables*
Liabilitas							***Liabilities***
Simpanan nasabah							*Deposits from customers*
Giro	1,86%	6,13%	2,21%	4,51%	1,59%	1,03%	*Demand deposits*
Tabungan	1,57%	0,27%	1,53%	0,21%	1,44%	0,16%	*Savings deposits*
Deposito berjangka	6,17%	5,76%	5,34%	4,25%	3,49%	1,71%	*Time deposits*
Simpanan dari Bank lain							*Deposits from other banks*
Giro	0,95%	0,00%	1,12%	0,00%	0,99%	0,00%	*Demand deposits*
Deposito Berjangka	5,02%	0,00%	4,69%	0,00%	2,75%	0,00%	*Time deposits*
Inter-bank call money	6,20%	5,25%	5,65%	0,00%	3,40%	1,48%	*Inter-bank call money*
Efek-efek yang dijual dengan janji dibeli kembali	6,24%	0,00%	5,97%	0,00%	3,93%	0,00%	*Securities sold under repurchase agreements*
Surat berharga yang yang diterbitkan	6,92%	0,00%	7,99%	0,00%	8,56%	0,00%	*Securities issued*
Pinjaman yang diterima	5,16%	1.39%	5,08%	1,37%	5,47%	0,90%	*Fund borrowing*
Pinjaman subordinasi dan efek-efek Subordinasi	8,28%	4,20%	8,28%	4,20%	8,28%	4,20%	*Subordinated loan and securities*

45. MANAJEMEN RISIKO (lanjutan)

45. RISK MANAGEMENT (continued)

Risiko Pasar (lanjutan)

Market Risk (continued)

i. Risiko tingkat suku bunga (lanjutan)

i. Interest rate risk (continued)

Tabel di bawah ini mengikhtisarkan eksposur Bank terhadap risiko tingkat suku bunga *(gross):*

The tables below summarize the Bank's exposure to interest rate risk (gross):

	31 Desember/*December 31,* 2024						
	Suku bunga mengambang/*Variable interest rate*						
	Tidak lebih dari 3 bulan/ *Not more than 3 months*	Lebih dari 3 bulan tetapi tidak lebih dari 1 tahun/ *More than 3 months but less than 1 year*	Lebih dari 1 *tahun*/ *More than 1 year*	Suku bunga *tetap*/ *Fixed interest rate*	Tidak dikenakan bunga/syariah *Non-interest bearing/sharia*	Total	
Aset Keuangan							***Financial Assets***
Kas	-	-	-	-	2.105.620	2.105.620	*Cash*
Giro pada Bank Indonesia	-	-	-	18.413.686	4.326.234	22.739.920	*Current accounts with Bank Indonesia*
Giro pada bank lain	5.951.545	-	-	-	201	5.951.746	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	-	-	-	2.851.104	1.810.000	4.661.104	*Placements with Bank Indonesia and other banks*
Efek-efek	-	-	3.580.141	1.262.479	20.520.790	25.363.410	*Securities*
Obligasi pemerintah	-	-	-	25.408.237	10.067.293	35.475.530	*Government bonds*
Tagihan Akseptasi	-	-	-	-	941.898	941.898	*Acceptance Receivable*
Efek-efek yang Dibeli dengan Janji Dijual Kembali	-	-	-	175.625	-	175.625	*Securities Purchased under Agreement to Resell*
Tagihan Derivatif	-	-	-	-	102.843	102.843	*Derivative receivabless*
Kredit yang diberikan dan piutang /pembiayaan syariah	5.645.341	9.111.795	149.632.739	149.690.230	43.892.827	357.972.932	*Loans and sharia financing/ receivable*
Bunga yang masih akan diterima	-	-	-	-	11.518.574	11.518.574	*Interest receivable*
Aset lain-lain*)				-	1.781.884	1.781.884	*Other assets**)
Total aset keuangan	**11.596.886**	**9.111.795**	**153.212.880**	**197.801.361**	**97.068.164**	**468.791.086**	*Total financial assets*
Liabilitas Keuangan							***Financial Liabilities***
Liabilitas segera**)	-	-	-	-	2.258.154	2.258.154	*Liabilities due immediately***)
Simpanan dari nasabah							*Deposits from customers*
Giro	63.535.244	-	-	77.488.018	18.882.765	159.906.027	*Demand deposits*
Tabungan	37.700.149	-	-	-	1.521.932	39.222.081	*Savings deposits*
Deposito berjangka	-	-	-	153.309.371	-	153.309.371	*Time deposits*
Simpanan dari bank lain	-	-	-	-	70.035	70.035	*Deposits from other banks*
Liabilitas akseptasi	-	-	-	-	941.898	941.898	*Acceptance payable*
Liabilitas derivatif	-	-	-	-	-	-	*Acceptance payable*
Surat-surat berharga diterbitkan	-	-	-	5.444.524	-	5.444.524	*Securities issued*
Pinjaman yang diterima	-	-	-	33.485.084	-	33.485.084	*Fund Borrowings*
Bunga yang masih harus dibayar	-	-	-	-	658.070	658.070	*Interest payables*
Liabilitas lain-lain***)	-	-	-	-	313.931	313.931	*Other liabilities****)
Pinjaman subordinasi dan Efek-efek subordinasi	-	-	-	6.328.105	-	6.328.105	*Subordinated Loan and Securities*
Total liabilitas keuangan	101.235.393	-	-	276.055.102	24.646.785	401.937.280	*Total financial liabilities*
Gap *repricing* suku bunga-kotor	**(89.638.507)**	**9.111.795**	**153.212.880**	**(78.253.741)**	**72.421.379**	**66.853.806**	***Gross interest repricing gap***

*) Terdiri dari tagihan kepada pihak ketiga.

**) Terdiri dari kewajiban kepada pihak ketiga, bagi hasil yang belum dibagikan, deposito berjangka jatuh tempo dan bunga atas deposito berjangka namun belum diambil nasabah.

***) Terdiri atas setoran jaminan dan dana jaminan pengembang (kewajiban kepada pihak ketiga).

*) *Consists of third party receivables.*

**) *Consists of third party payables, undistributed profit sharing, matured time deposits and interest on time deposits not collected by customers.*

***) *Consists of guarantee deposits and developers' security deposits (liabilities to third party).*

45. MANAJEMEN RISIKO (lanjutan)

45. RISK MANAGEMENT (continued)

Risiko Pasar (lanjutan)

Market Risk (continued)

i. Risiko tingkat suku bunga (lanjutan)

i. Interest rate risk (continued)

Tabel di bawah ini mengikhtisarkan eksposur Bank terhadap risiko tingkat suku bunga *(gross)* (lanjutan):

The tables below summarize the Bank's exposure to interest rate risk (gross) (continued):

	31 Desember/*December 31,* 2023						
	Suku bunga mengambang/*Variable interest rate*						
	Tidak lebih dari 3 bulan/ *Not more than 3 months*	Lebih dari 3 bulan tetapi tidak lebih dari 1 tahun/ *More than 3 months but less than 1 year*	Lebih dari 1 *tahun/ More than 1 year*	Suku bunga *tetap/ Fixed interest rate*	Tidak dikenakan bunga/syariah *Non-interest bearing/sharia*	Total	
Aset Keuangan							***Financial Assets***
Kas	-	-	-	-	2.127.489	2.127.489	*Cash*
Giro pada Bank Indonesia	-	-	-	14.317.572	3.828.189	18.145.761	*Current accounts with Bank Indonesia*
Giro pada bank lain	2.203.198	-	-	-	200	2.203.398	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	-	-	-	27.411.122	3.150.000	30.561.122	*Placements with Bank Indonesia and other banks*
Efek-efek	1.042.013	-	-	4.154.990	108.870	5.305.873	*Securities*
Obligasi pemerintah	-	-	-	21.735.376	14.158.553	35.893.929	*Government bonds*
Tagihan Akseptasi	-	-	-	-	544.567	544.567	*Acceptance Receivable*
Tagihan Derivatif	-	-	-	32.176	-	32.176	*Derivative receivabless*
Kredit yang diberikan dan piutang /pembiayaan syariah	4.843.685	8.545.336	142.367.230	140.827.609	37.114.281	333.698.141	*Loans and sharia financing/ receivable*
Bunga yang masih akan diterima	-	-	-	-	11.526.687	11.526.687	*Interest receivable*
Aset lain-lain*)	-	-	-	-	1.873.496	1.873.496	*Other assets**)
Total aset keuangan	**8.088.896**	**8.545.336**	**142.367.230**	**208.478.845**	**74.432.332**	**441.912.639**	*Total financial assets*
Liabilitas Keuangan							***Financial Liabilities***
Liabilitas segera**)	-	-	-	-	2.567.271	2.567.271	*Liabilities due immediately***)
Simpanan dari nasabah							*Deposits from customers*
Giro	75.362.852	-	-	54.006.439	13.439.465	142.808.756	*Demand deposits*
Tabungan	37.722.161	-	-	-	1.276.592	38.998.753	*Savings deposits*
Deposito berjangka	-	-	-	140.693.639	-	140.693.639	*Time deposits*
Simpanan dari bank lain	-	-	-	-	91.312	91.312	*Deposits from other banks*
Liabilitas akseptasi	-	-	-	-	544.567	544.567	*Acceptance payable*
Liabilitas derivatif	-	-	-	-	-	-	*Acceptance payable*
Surat-surat berharga diterbitkan	-	-	-	8.006.252	265.846	8.272.098	*Securities issued*
Pinjaman yang diterima	-	-	-	30.531.530	3.230.559	33.762.089	*Fund Borrowings*
Bunga yang masih harus dibayar	-	-	-	-	647.496	647.496	*Interest payables*
Liabilitas lain-lain***)	-	-	-	-	521.548	521.548	*Other liabilities****)
Pinjaman subordinasi dan Efek-efek subordinasi	-	-	-	9.112.837	-	9.112.837	*Subordinated Loan and Securities*
Total liabilitas keuangan	**113.085.013**	**-**	**-**	**242.350.697**	**22.584.656**	**378.020.366**	*Total financial liabilities*
Gap *repricing* suku bunga-kotor	**(104.996.117)**	**8.545.336**	**142.367.230**	**(33.871.852)**	**51.847.676**	**63.892.273**	***Gross interest repricing gap***

*) Terdiri dari tagihan kepada pihak ketiga.

**) Terdiri dari kewajiban kepada pihak ketiga, bagi hasil yang belum dibagikan, deposito berjangka jatuh tempo dan bunga atas deposito berjangka namun belum diambil nasabah.

***) Terdiri atas setoran jaminan dan dana jaminan pengembang (kewajiban kepada pihak ketiga).

*) *Consists of third party receivables.*

**) *Consists of third party payables, undistributed profit sharing, matured time deposits and interest on time deposits not collected by customers.*

***) *Consists of guarantee deposits and developers' security deposits (liabilities to third party).*

45. MANAJEMEN RISIKO (lanjutan)

Risiko Pasar (lanjutan)

i. Risiko tingkat suku bunga (lanjutan)

Tabel di bawah ini mengikhtisarkan eksposur Bank terhadap risiko tingkat suku bunga *(gross)* (lanjutan):

45. RISK MANAGEMENT (continued)

Market Risk (continued)

i. Interest rate risk (continued)

The tables below summarize the Bank's exposure to interest rate risk (gross)(continued):

	31 Desember/*December 31*, 2022						
	Suku bunga mengambang/*Variable interest rate*						
	Tidak lebih dari 3 bulan/ *Not more than 3 months*	Lebih dari 3 bulan tetapi tidak lebih dari 1 tahun/ *More than 3 months but less than 1 year*	Lebih dari 1 *tahun*/ *More than 1 year*	Suku bunga *tetap*/ *Fixed interest rate*	Tidak dikenakan bunga/syariah *Non-interest bearing/sharia*	Total	
Aset Keuangan							***Financial Assets***
Kas	-	-	-	-	1.661.533	1.661.533	*Cash*
Giro pada Bank Indonesia	22.035.579	-	-	-	3.381.362	25.416.941	*Current accounts with Bank Indonesia*
Giro pada bank lain	1.471.059	-	-	-	1.198	1.472.257	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	-	-	-	10.897.955	2.078.000	12.975.955	*Placements with Bank Indonesia and other banks*
Efek-efek	793.831	-	-	816.282	113.055	1.723.168	*Securities*
Obligasi pemerintah	-	-	-	43.150.065	8.814.908	51.964.973	*Government bonds*
Efek-efek yang dibeli dengan janji dijual kembali	-	-	-	1.434.190	-	1.434.190	*Securities purchaces under agreement to resell*
Tagihan akseptasi	-	-	-	-	420.562	420.562	*Acceptance Receivable*
Tagihan derivatif	-	-	-	103.939	-	103.939	*Derivative receivabless*
Kredit yang diberikan dan piutang /pembiayaan syariah	3.898.479	9.715.127	187.066.985	65.976.974	31.624.139	298.281.704	*Loans and sharia financing/ receivable*
Bunga yang masih akan diterima	-	-	-	-	10.750.302	10.750.302	*Interest receivable*
Aset lain-lain*)	-	-	-	-	1.040.048	1.040.048	*Other assets**)
Total aset keuangan	28.198.948	9.715.127	187.066.985	122.379.405	59.885.107	407.245.572	*Total financial assets*
Liabilitas Keuangan							***Financial Liabilities***
Liabilitas segera**)	-	-	-	-	2.614.055	2.614.055	*Liabilities due immediately***)
Simpanan dari nasabah							*Deposits from customers*
Giro	62.039.775	-	-	42.861.143	8.624.809	113.525.727	*Demand deposits*
Tabungan	36.182.329	-	-		1.193.718	37.376.047	*Savings deposits*
Deposito berjangka	-	-	-	146.198.027	-	146.198.027	*Time deposits*
Simpanan dari bank lain	136.408	-	-	-	-	136.408	*Deposits from other banks*
Liabilitas akseptasi	-	-	-	-	420.562	420.562	*Acceptance payable*
Liabilitas derivatif	-	-	-	-	-	-	*Derivative liabilities*
Surat-surat berharga diterbitkan	-	-	-	8.652.260	-	8.652.260	*Securities issued*
Pinjaman yang diterima	-	-	-	22.803.052	2.017.953	24.821.005	*Fund Borrowings*
Bunga yang masih harus dibayar	-	-	-	-	629.366	629.336	*Interest payables*
Liabilitas lain-lain***)	-	-	-	-	4.690.821	4.690.821	*Other liabilities****)
Pinjaman subordinasi dan Efek-efek subordinasi	-	-	-	9.158.219	-	9.158.219	*Subordinated Loan and Securities*
Total liabilitas keuangan	98.358.512	-	-	229.672.701	20.191.284	348.222.467	*Total financial liabilities*
Gap *repricing* suku bunga-kotor	**(70.159.564)**	**9.715.127**	**187.066.985**	**(107.293.296)**	**39.693.823**	**59.023.105**	***Gross interest repricing gap***

*) Terdiri dari tagihan kepada pihak ketiga.

**) Terdiri dari kewajiban kepada pihak ketiga, bagi hasil yang belum dibagikan, deposito berjangka jatuh tempo dan bunga atas deposito berjangka namun belum diambil nasabah.

***) Terdiri atas setoran jaminan dan dana jaminan pengembang (kewajiban kepada pihak ketiga).

**) Consists of third party receivables.*

***) Consists of third party payables, undistributed profit sharing, matured time deposits and interest on time deposits not collected by customers.*

****) Consists of guarantee deposits and developers' security deposits (liabilities to third party).*

45. MANAJEMEN RISIKO (lanjutan)

Risiko Pasar (lanjutan)

i. Risiko tingkat suku bunga (lanjutan)

Analisis sensitivitas untuk beberapa faktor pasar menunjukkan bagaimana laba atau rugi dan ekuitas dapat dipengaruhi oleh perubahan dari beberapa faktor risiko sesuai dengan tabel dibawah ini. Secara umum, sensitivitas diestimasi dengan membandingkan suatu nilai awal ke nilai tertentu setelah perubahan tertentu dari faktor pasar, dengan mengasumsikan seluruh variabel lainnya tetap. Sensitivitas atas laporan laba rugi dan penghasilan komprehensif lain merupakan efek atas perubahan estimasi suku bunga atas laba rugi untuk suatu periode, berdasarkan nilai suku bunga mengambang atas aset dan liabilitas yang diperdagangkan dan tidak diperdagangkan yang dimiliki Bank pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022. Analisis sensitivitas atas ekuitas dihitung dengan menilai kembali perubahan estimasi suku bunga tetap atas aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan nilai wajar melalui laba rugi pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022. Jumlah sensitivitas atas ekuitas didasarkan pada asumsi bahwa terdapat perubahan paralel dalam kurva imbal hasil.

Tabel dibawah ini menunjukkan sensitivitas dari laporan laba rugi dan penghasilan komprehensif lain dan ekuitas Bank terhadap kemungkinan perubahan wajar atas suku bunga untuk aset dan liabilitas keuangan dengan suku bunga tetap pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022, terdapat perubahan signifikan dibandingkan dengan Desember 2022 atas dampak ke laba rugi dan ekuitas dikarenakan peningkatan portofolio surat berharga dalam USD:

45. RISK MANAGEMENT (continued)

Market Risk (continued)

i. Interest rate risk (continued)

Sensitivity analyses for several market factors showing how profit or loss and equity could be affected by changes in the relevant risk factor are shown in the tables below. In general, sensitivity is estimated by comparing an initial value to the value derived after a specified change in the market factor, assuming all other variables are constant. The sensitivity of the statement of profit or loss and other comprehensive income is the effect of the assumed changes in interest rates on the profit or loss for a period, based on the variable rate trading and non-trading financial assets and liabilities held by the Bank as of December 31, 2024, 2023 and 2022. The sensitivity of equity is calculated by revaluing fixed interest rate fair value through other comprehensive income and fair value to profit or loss financial assets as of December 31, 2024, 2023 and 2022 for the effects of the assumed changes in interest rates. The total sensitivity of equity is based on the assumption that there are parallel shifts in the yield curve.

The tables below demonstrate the sensitivity of the Bank's statement of profit or loss and other comprehensive income and equity to reasonably possible changes in interest rates for fixed rate financial assets and liabilities as of December 31, 2024, 2023 and 2022, there is significant changes compare to December 2022 from impact of profit or loss and equity because of the increasing from securities in USD:

	31 Desember/*December 31*, 2024			
	Perubahan basis poin/*Change in basis point*	**Dampak ke laporan laba rugi komprehensif sebelum pajak/ *Impact to Statement of Comprehensive Income before tax***	**Dampak ke ekuitas/ *Impact to Equity***	
Rupiah	+125	(261.744)	(315.892)	*Rupiah*
	+50	(109.241)	(129.741)	
	-50	108.854	133.279	
	-125	293.444	337.962	
Dolar Amerika Serikat	+125	(11.242)	(509.350)	*United States Dollar*
	+50	(4.502)	(216.369)	
	-50	4.509	235.193	
	-125	11.286	627.522	

45. MANAJEMEN RISIKO (lanjutan)

45. RISK MANAGEMENT (continued)

Risiko Pasar (lanjutan)

Market Risk (continued)

i. Risiko tingkat suku bunga (lanjutan)

i. Interest rate risk (continued)

Tabel dibawah ini menunjukkan sensitivitas dari laporan laba rugi dan penghasilan komprehensif lain dan ekuitas Bank terhadap kemungkinan perubahan wajar atas suku bunga untuk aset dan liabilitas keuangan dengan suku bunga tetap pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022, terdapat perubahan signifikan dibandingkan dengan Desember 2022 atas dampak ke laba rugi dan ekuitas dikarenakan peningkatan portofolio surat berharga dalam USD: (lanjutan)

The tables below demonstrate the sensitivity of the Bank's statement of profit or loss and other comprehensive income and equity to reasonably possible changes in interest rates for fixed rate financial assets and liabilities as of December 31, 2024, 2023 and 2022, there is significant changes compare to December 2022 from impact of profit or loss and equity because of the increasing from securities in USD: (continued)

31 Desember/*December 31*, 2023

	Perubahan basis poin/*Change in basis point*	Dampak ke laporan laba rugi dan penghasilan komprehensif lainnya sebelum pajak/ *Impact to Statement of Comprehensive Income before tax*	Dampak ke ekuitas/ *Impact to Equity*	
Rupiah	+125	(67.861)	(285.489)	*Rupiah*
	+50	(28.181)	(116.975)	
	-50	29.653	120.901	
	-125	77.208	310.063	
Dolar Amerika Serikat	+125	(146)	(567.433)	*United States Dollar*
	+50	(58)	(241.791)	
	-50	59	264.001	
	-125	146	706.923	

31 Desember/*December 31,* 2022

	Perubahan basis poin/*Change in basis point*	Dampak ke laporan laba rugi dan penghasilan komprehensif lainnya sebelum pajak/ *Impact to Statement of profit or loss and Other Comprehensive Income before tax*	Dampak ke ekuitas/ *Impact to Equity*	
Rupiah	+125	(43.380)	(556.734)	*Rupiah*
	+50	(17.878)	(230.043)	
	-50	18.623	240.557	
	-125	48.045	622.570	
Dolar Amerika Serikat	+125	-	(546.154)	*United States Dollar*
	+50	-	(232.895)	
	-50	-	254.593	
	-125	-	682.459	

45. MANAJEMEN RISIKO (lanjutan)

45. RISK MANAGEMENT (continued)

Risiko Pasar (lanjutan)

Market Risk (continued)

i. Risiko tingkat suku bunga (lanjutan)

i. Interest rate risk (continued)

Tabel dibawah ini menunjukkan sensitivitas dari laporan laba rugi dan penghasilan komprehensif lain terhadap kemungkinan perubahan suku bunga untuk aset dan liabilitas keuangan dengan suku bunga *variable* pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022:

The tables below demonstrate the sensitivity of profit or loss and other comprehensive income to reasonably possible changes in interest rates for variable rate financial assets and liabilities as of December 31, 2024, 2023 and 2022, respectively:

	31 Desember/*December 31*, 2024		
	Perubahan basis poin/ ***Change in basis point***	**Pengaruh ke laporan laba rugi komprehensif/** ***Impact to Statement of comprehensive income***	
Rupiah	±125	±432.964	*Rupiah*
	±50	±173.186	

	31 Desember/*December 31,* 2023		
	Perubahan basis poin/ ***Change in basis point***	**Pengaruh ke laporan laba rugi dan penghasilan komprehensif lainnya/** ***Impact to Statement of profit or loss and other comprehensive income***	
Rupiah	±125	±410.748	*Rupiah*
	±50	±164.299	

	31 Desember/*December 31,* 2022		
	Perubahan basis poin/ ***Change in basis point***	**Pengaruh ke laporan laba rugi dan penghasilan komprehensif lainnya/** ***Impact to Statement of profit or loss and other comprehensive income***	
Rupiah	±125	±405.949	*Rupiah*
	±50	±162.380	

45. MANAJEMEN RISIKO (lanjutan)

45. RISK MANAGEMENT (continued)

Risiko Pasar (lanjutan)

Market Risk (continued)

ii. Risiko Nilai Tukar (lanjutan)

ii. Exchange rate risk (continued)

Risiko nilai tukar adalah kemungkinan kerugian yang timbul dari perubahan kurs valuta asing. Bank mengelola paparan terhadap pengaruh fluktuasi nilai tukar dengan Posisi Devisa Neto sesuai dengan peraturan OJK (tidak diaudit).

Exchange rate risk is the probability of loss to earnings arising from changes in foreign exchange rates. The Bank manages exposure to effects of fluctuations in exchange rates with Net Open Position based on OJK regulations (unaudited).

	31 Desember/*December* 31, 2024		
	Perubahan persentase nilai tukar mata uang asing/ ***Percentage change in foreign currency rate***	**Pengaruh ke laporan laba rugi komprehensif/** ***Impact to Statement of comprehensive income***	
Dolar Amerika Serikat	±0.30% ±0.35%	±4.804 ±5.604	*United States Dollar*

	31 Desember/*December 31,* 2023		
	Perubahan persentase nilai tukar mata uang asing/ ***Percentage change in foreign currency rate***	**Pengaruh ke laporan laba rugi dan penghasilan komprehensif lainnya/** ***Impact to Statement of profit or loss and*** **other** ***comprehensive income***	
Dolar Amerika Serikat	±0.30% ±0.35%	±3.840 ±4.480	*United States Dollar*

	31 Desember/*December 31,* 2022		
	Perubahan persentase nilai tukar mata uang asing/ ***Percentage change in foreign currency rate***	**Pengaruh ke laporan laba rugi dan penghasilan komprehensif lainnya/** ***Impact to Statement of profit or loss and*** **other** ***comprehensive income***	
Dolar Amerika Serikat	±0.30% ±0.35%	±1.106 ±1.290	*United States Dollar*

Sensitivitas atas laporan laba rugi dan penghasilan komprehensif lain merupakan dampak yang diestimasi atas perubahan yang diasumsikan atas perubahan nilai tukar berdasarkan aset dan liabilitas keuangan dalam mata uang asing.

The sensitivity of the statement of profit or loss and other comprehensive income is the estimated effect of the assumed change in foreign currency exchange rates on income, based on foreign currency denominated assets and liabilities.

Pada tanggal 31 Desember 2024, 2023 dan 2022, dampak atas perubahan nilai tukar mata uang lainnya seperti Pound Sterling Inggris, Euro Eropa, Yen Jepang, Dolar Singapura, Dolar Australia dan Dolar Hongkong tidak material.

As of December 31, 2024, 2023 and 2022, the effect of fluctuations in exchange rates of other currencies, such as British Pound Sterling, European Euro, Japanese Yen, Singapore Dollar, Australian Dollar and Hongkong Dollar, is not material.

46. NILAI WAJAR ASET DAN LIABILITAS KEUANGAN (lanjutan)

Tabel di bawah ini menyajikan perbandingan antara nilai tercatat dan nilai wajar dari semua aset dan liabilitas keuangan. Nilai wajar yang diungkapkan adalah berdasarkan informasi relevan yang tersedia pada tanggal 31 Desember 2024, 2023 dan 2022, dan tidak diperbaharui untuk mencerminkan perubahan dalam kondisi pasar yang telah terjadi setelah tanggal ini.

46. FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES (continued)

The table below summarizes the comparison between the carrying amounts and fair values of all financial assets and liabilities of the Bank. The fair values disclosed are based on relevant information available as of December 31, 2024, 2023 and 2022 and are not updated to reflect changes in market conditions which have occurred after these dates.

	31 Desember/*December 31*, 2024		31 Desember/*December 31*, 2023		31 Desember/*December 31*, 2022		
	Nilai Tercatat/ *Carrying Value*	Nilai wajar/ *Fair value*	Nilai Tercatat/ *Carrying Value*	Nilai wajar/ *Fair value*	Nilai Tercatat/ *Carrying Value*	Nilai wajar/ *Fair value*	
Aset Keuangan							***Financial Assets***
Kas	2.105.620	2.105.620	2.127.489	2.127.489	1.661.533	1.661.533	*Cash*
Nilai wajar melalui laba rugi							*Fair value through profit or loss*
Efek-efek	19.358.865	19.358.865	1.042.013	1.042.013	793.831	793.831	*Securities*
Obligasi Pemerintah	3.265.550	3.265.550	3.796.440	3.796.440	19.591.199	19.591.199	*Government bonds*
Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain							*Financial asset held at fair value through other comprehensive income*
Efek-efek	1.964.907	1.964.907	1.928.336	1.928.336	655.293	655.293	*Securities*
Obligasi Pemerintah	14.109.049	14.109.049	12.511.991	12.511.991	14.332.949	14.332.949	*Government bonds*
Diukur pada biaya perolehan amortisasi							*Amortized cost*
Efek-efek	4.039.638	4.039.638	2.335.524	2.338.545	271.645	280.451	*Securities*
Obligasi pemerintah	18.100.930	18.100.930	19.585.498	19.502.452	18.040.825	17.945.001	*Government bonds*
Efek-efek yang Dibeli dengan Janji Dijual Kembali	175.625	175.625	-	-	1.434.190	1.434.190	*Securities purchased under agreement to resell*
Tagihan derivatif	102.843	102.843	32.176	32.176	103.939	103.939	*Derivative receivable*
Tagihan Akseptasi	941.898	941.898	544.567	544.567	420.426	420.426	*Acceptance Receivable*
Giro pada Bank Indonesia	22.739.920	22.739.920	18.145.761	18.145.761	25.416.941	25.416.941	*Current accounts with Bank Indonesia*
Giro pada bank lain	5.951.746	5.951.746	2.201.594	2.201.594	1.470.510	1.470.510	*Current accounts with other Bank*
Penempatan pada Bank Indonesia dan Bank Lain	4.661.104	4.661.104	30.561.122	30.561.122	12.975.955	12.975.955	*Placements with Bank Indonesia and other Banks*
Kredit yang diberikan dan Piutang Syariah							*Loans and sharia financing/ receivables*
Konsumsi							*Consumer*
Pemilikan rumah	272.529.340	265.489.178	251.160.354	246.332.418	227.522.319	225.618.498	*Housing loan*
Non-kepemilikan Rumah	14.213.133	14.213.133	12.726.250	12.726.250	11.425.286	11.425.286	*Non-housing loan*
Modal kerja	32.384.070	32.384.070	31.192.994	31.192.994	26.965.038	26.965.038	*Working capital*
Investasi	16.282.762	16.282.762	13.956.609	13.956.609	10.117.008	10.117.008	*Investment*
Sindikasi	7.717.712	7.717.712	7.127.988	7.127.988	4.488.751	4.488.751	*Syndicated*
Direksi dan karyawan	1.788.728	1.788.728	1.941.982	1.941.982	2.088.379	2.088.379	Directors and employees
Bunga yang masih akan diterima	11.518.574	11.518.574	11.526.687	11.526.687	10.750.302	10.750.302	*Interest receivable*
Aset lain-lain*)	1.781.884	1.781.884	1.873.496	1.873.496	1.040.048	1.040.048	*Other assets*)
Total aset keuangan	**455.733.898**	**448.693.736**	**426.318.871**	**421.410.910**	**391.566.367**	**389.575.528**	***Total financial assets***
Liabilitas Keuangan							***Financial Liabilities***
Nilai wajar melalui laba rugi							*Fair value through profit or loss*
Liabilitas segera**)	2.258.154	2.258.154	2.567.271	2.567.271	2.611.027	2.611.027	*Current liabilities***)
Simpanan nasabah							*Deposits from customers*
Giro	159.906.028	159.906.028	142.808.756	142.808.756	113.525.727	113.525.727	*Demand deposits*
Tabungan	39.222.081	39.222.081	38.998.753	38.998.753	37.376.047	37.376.047	*Savings deposits*
Deposito Berjangka	153.309.371	153.309.371	140.693.639	140.693.639	146.198.027	146.198.027	*Time deposits*
Simpanan dari Bank Lain							*Deposits from other banks*
Giro	70.035	70.035	91.312	91.312	136.408	136.408	*Demand deposits*
Surat berharga yang Diterbitkan	5.444.524	5.518.386	8.272.098	8.387.536	8.652.260	8.828.249	*Securities issued*
Liabilitas akseptasi	941.898	941.898	544.567	544.567	420.562	420.562	*Acceptance Paybale*
Pinjaman yang diterima	33.485.084	29.739.959	33.762.089	31.075.777	24.821.005	21.731.531	*Fund Borrowings*
Bunga yang masih harus dibayar	658.070	658.070	647.496	647.496	629.366	600.410	*Interest payables*
Liabilitas lain-lain***)	313,931	313,931	521.548	521.548	4.690.821	4.690.821	*Other liabilities***)
Pinjaman Subordinasi dan efek-efek subordinasi	6.328.105	6.322.658	9.112.837	9.006.404	9.158.219	8.899.563	*Subordinated Loan and securities*
Total liabilitas keuangan	**401.937.281**	**398.260.571**	**378.020.366**	**375.343.059**	**348.219.469**	**345.018.372**	***Total financial liablities***

*) Terdiri dari tagihan pihak ketiga.
**) Terdiri dari kewajiban kepada pihak ketiga, bagi hasil yang belum dibagikan, deposito berjangka jatuh tempo dan bunga atas deposito berjangka namun belum diambil nasabah.
***) Terdiri atas setoran jaminan dan dana jaminan pengembang (kewajiban kepada pihak ketiga).

*) *Consists of third party receivables.*
**) *Consists of third party payables, undistributed profit sharing, matured time deposits and interest on time deposits not collected by customers.*
***) *Consists of guarantee deposits and developers' security deposits (liabilities to third party).*

46. NILAI WAJAR ASET DAN LIABILITAS KEUANGAN (lanjutan)

Tabel di bawah ini menyajikan instrumen keuangan yang diakui pada nilai wajar berdasarkan hirarki yang digunakan Bank untuk menentukan dan mengungkapkan nilai wajar dari instrumen keuangan:

(i) Tingkat 1: harga kuotasian (tanpa penyesuaian) di pasar aktif untuk aset atau liablitas yang identik yang dapat diakses pada tanggal pengukuran;

(ii) Tingkat 2: input selain harga kuotasian yang termasuk dalam level 1 yang dapat diobservasi untuk aset dan liabilitas, baik secara langsung atau tidak langsung;

(iii) Tingkat 3: input yang tidak dapat diobservasi untuk aset dan liabilitas.

46. FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES (continued)

The tables below show the financial instruments recognized at fair value based on the hierarchy used by the Bank in determining and disclosing the fair value of financial instruments:

(i) Level 1: quoted prices (unadjusted) in active markets for identical assets or liabilities which are accessible at the measurement date;

(ii) Level 2: inputs other than quoted prices included in level 1 that are observable for the assets and liabilities, either directly or indirectly;

(iii) Level 3: inputs that are not observable for the assets and liabilities.

	31 Desember/*December 31*, 2024				
	Nilai Wajar/ ***Fair Value***	**Tingkat/** ***Level 1***	**Tingkat/** ***Level 2***	**Tingkat/** ***Level 3***	
Aset Keuangan					***Financial Assets***
Nilai wajar melalui laba rugi					*Fair value through profit or loss*
Efek-efek	19.358.865	18.899.989	458.876	-	*Securities*
Obligasi pemerintah	3.265.550	3.265.550	-	-	*Government bonds*
Total nilai wajar laba rugi	22.624.415	22.165.539	458.876	-	*Total fair value through profit or loss*
Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain					*Financial asset held at fair value through other comprehensive income*
Efek-efek	1.964.907	1.964.907	-	-	*Securities*
Obligasi pemerintah	14.109.949	14.109.949	-	-	*Government bonds*
Total Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain	16.074.856	16.074.856	-	-	*Total financial asset held at fair value through other comprehensive income*
Diukur pada biaya perolehan amortisasi					*Amortized cost*
Efek-efek	4.039.638	50.000	-	3.989.638	*Securities*
Obligasi pemerintah	18.100.930	18.100.930	-	-	*Government bonds*
Efek-efek yang dibeli dengan janji dijual kembali	175.625	-	175.625	-	*Securities purchased under agreement to resell*
Total diukur pada biaya perolehan amortisasi	22.316.193	18.150.930	175.625	-	*Total Amortized cost*
Tagihan Derivatif	102.843	-	102.843	-	*Derivative Receivable*
Kredit yang diberikan dan piutang					*Loan and receivables*
Kredit yang diberikan. piutang dan pembiayaan Syariah - Net	337.875.583	-	331.276.899	6.598.684	*Loan and sharia financing receivables*
Liabilitas Keuangan					***Financial Liabilities***
Liabilitas Derivatif	-				*Derivative payable*
Surat berharga yang diterbitkan	5.518.386	-	5.518.386	-	*Securities issued*
Pinjaman yang diterima	29.739.959	-	29.739.959	-	*Fund borrowing*
Pinjaman subordinasi dan efek-efek subordinasi	6.322.658	-	6.322.658	-	*Subordinated loan and securities*

46. NILAI WAJAR ASET DAN LIABILITAS KEUANGAN (lanjutan)

Tabel di bawah ini menyajikan instrumen keuangan yang diakui pada nilai wajar berdasarkan hirarki yang digunakan Bank untuk menentukan dan mengungkapkan nilai wajar dari instrumen keuangan: (lanjutan)

46. FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES (continued)

The tables below show the financial instruments recognized at fair value based on the hierarchy used by the Bank in determining and disclosing the fair value of financial instruments: (continued)

	31 Desember/*December 31*, 2023				
	Nilai Wajar/ *Fair Value*	**Tingkat/ *Level 1***	**Tingkat/ *Level 2***	**Tingkat/ *Level 3***	
Aset Keuangan					***Financial Assets***
Nilai wajar melalui laba rugi					*Fair value through profit or loss*
Efek-efek	1.042.013	501.570	540.443	-	*Securities*
Obligasi pemerintah	3.796.440	3.796.440	-	-	*Government bonds*
Total nilai wajar laba rugi	**4.838.453**	**4.298.010**	**540.443**	**-**	*Total fair value through profit or loss*
Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain					*Financial asset held at fair value through other comprehensive income*
Efek-efek	1.928.336	1.928.336	-	-	*Securities*
Obligasi pemerintah	12.511.991	12.511.991	-	-	*Government bonds*
Total Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain	**14.440.327**	**14.440.327**	-	-	*Total financial asset held at fair value through other comprehensive income*
Diukur pada biaya perolehan amortisasi					*Amortized cost*
Efek-efek	2.338.545	228.097	-	2.110.448	*Securities*
Obligasi pemerintah	19.502.452	19.502.452	-	-	*Government bonds*
Efek-efek yang dibeli dengan janji dijual kembali	-	-	-	-	*Securities purchased under agreement to resell*
Total diukur pada biaya perolehan amortisasi	**21.840.997**	**19.730.549**	**1.465.771**	**644.677**	*Total Amortized cost*
Tagihan Derivatif	32.176	-	32.176	-	*Derivative Receivable*
Kredit yang diberikan dan piutang					*Loan and receivables*
Kredit yang diberikan. piutang dan pembiayaan Syariah - Net	313.278.241	-	304.624.202	8.654.039	*Loan and sharia financing receivables*
Liabilitas Keuangan					***Financial Liabilities***
Surat berharga yang diterbitkan	8.387.536	-	8.387.536	-	*Securities issued*
Pinjaman yang diterima	31.075.777	-	31.075.777	-	*Fund borrowing*
Pinjaman subordinasi dan efek-efek subordinasi	9.006.404	-	9.006.404	-	*Subordinated loan and securities*

46. NILAI WAJAR ASET DAN LIABILITAS KEUANGAN (lanjutan)

Tabel di bawah ini menyajikan instrumen keuangan yang diakui pada nilai wajar berdasarkan hirarki yang digunakan Bank untuk menentukan dan mengungkapkan nilai wajar dari instrumen keuangan: (lanjutan)

46. FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES (continued)

The tables below show the financial instruments recognized at fair value based on the hierarchy used by the Bank in determining and disclosing the fair value of financial instruments: (continued)

	31 Desember/*December 31*, 2022				
	Nilai Wajar/ ***Fair Value***	**Tingkat/** ***Level 1***	**Tingkat/** ***Level 2***	**Tingkat/** ***Level 3***	
Aset Keuangan					***Financial Assets***
Nilai wajar melalui laba rugi					*Fair value through profit or loss*
Efek-efek	793.831	301.416	492.415	-	*Securities*
Obligasi pemerintah	19.591.199	19.591.199	-	-	*Government bonds*
Total nilai wajar laba rugi	**20.385.030**	**19.892.615**	**492.415**	-	*Total fair value through profit or loss*
Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain					*Financial asset held at fair value through other comprehensive income*
Efek-efek	655.293	655.293	-	-	*Securities*
Obligasi pemerintah	14.332.949	14.332.949	-	-	*Government bonds*
Total Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain	**14.988.242**	**14.988.242**	-	-	*Total financial asset held at fair value through other comprehensive income*
Diukur pada biaya perolehan amortisasi					*Amortized cost*
Efek-efek	280.451	280.451	-	-	*Securities*
Obligasi pemerintah	17.945.001	17.945.001	-	-	*Government bonds*
Efek-efek yang dibeli dengan janji dijual kembali	1.434.190	1.434.190	-	-	*Securities purchased under agreement to resell*
Total diukur pada biaya perolehan amortisasi	**19.659.642**	**19.659.642**	**-**	**-**	*Total Amortized cost*
Tagihan Derivatif	103.939	-	103.939	-	*Derivative Receivable*
Kredit yang diberikan dan piutang					*Loan and receivables*
Kredit yang diberikan. piutang dan pembiayaan Syariah - Net	280.702.960	-	273.798.185	6.904.775	*Loan and sharia financing receivables*
Liabilitas Keuangan					***Financial Liabilities***
Surat berharga yang diterbitkan	8.828.249	-	8.828.249	-	*Securities issued*
Pinjaman yang diterima	21.731.531	-	21.731.531	-	*Fund borrowing*
Pinjaman subordinasi dan efek-efek subordinasi	8.899.563	-	8.899.563	-	*Subordinated loan and securities*

a. Nilai wajar aset dan kewajiban keuangan tertentu, kecuali efek-efek dan Obligasi Pemerintah yang dimiliki hingga jatuh tempo, kredit yang diberikan, pinjaman yang diterima, dan surat berharga yang diterbitkan, mendekati nilai tercatatnya karena mempunyai jangka waktu jatuh tempo yang singkat.

Estimasi nilai wajar terhadap aset keuangan tertentu ditetapkan berdasarkan diskonto arus kas dengan menggunakan suku bunga pasar uang yang berlaku untuk utang dengan risiko kredit dan sisa jatuh tempo yang serupa.

a. The fair values of certain financial assets and liabilities, except for securities and Government Bonds classified as held to maturity, loans, fund borrowings, and marketable securities issued approximate to their carrying values due to their short-term maturities.

The estimated fair values of certain financial assets are determined based on discounted cash flows using money market interest rates for debt instruments with similar credit risk and remaining maturities.

46. NILAI WAJAR ASET DAN LIABILITAS KEUANGAN (lanjutan)

Estimasi nilai wajar terhadap kewajiban keuangan tertentu yang tidak memiliki kuotasi di pasar aktif ditetapkan berdasarkan diskonto arus kas dengan menggunakan suku bunga utang baru dengan sisa jatuh tempo yang serupa.

b. Kredit yang diberikan

Portofolio kredit Bank secara umum terdiri dari kredit yang diberikan dengan suku bunga mengambang dan kredit yang diberikan dengan jangka pendek dengan suku bunga tetap. Kredit yang diberikan dinyatakan berdasarkan *amortized cost*. Nilai wajar dari kredit yang diberikan menunjukkan nilai diskon dari perkiraan arus kas masa depan yang diharapkan akan diterima oleh Bank dengan menggunakan suku bunga pasar saat ini.

Nilai tercatat dari kredit yang diberikan dengan suku bunga mengambang dan nilai tercatat atas kredit jangka pendek dengan suku bunga tetap adalah perkiraan yang layak atas nilai wajar.

c. Efek-efek dan Obligasi pemerintah

Nilai wajar untuk surat-surat berharga dan Obligasi pemerintah yang diukur pada biaya perolehan diamortisasi ditetapkan berdasarkan harga pasar atau harga kuotasi perantara (broker)/ pedagang efek *(dealer)*. Jika informasi ini tidak tersedia, nilai wajar diestimasi dengan menggunakan harga pasar kuotasi efek yang memiliki karakteristik kredit, jatuh tempo dan *yield* yang serupa atau dinilai dengan menggunakan metode penilaian internal.

d. Surat-surat berharga yang diterbitkan, pinjaman yang diterima dan pinjaman subordinasi dan efek-efek subordinasi

Nilai wajar agregat berdasarkan model diskonto arus kas menggunakan tingkat suku bunga pasar untuk sisa periode jatuh temponya.

46. FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES (continued)

The estimated fair values of certain financial obligations which are not quoted in an active market are determined based on discounted cash flows using interest rates of instruments with similar remaining maturities.

b. Loans

Generally, the Bank's loan portfolio consists of loans with variable interest rate and short-term loans with fixed interest rate. Loans are stated at amortized cost. The estimated fair value of loans represents the discounted amount of estimated future cash flows expected to be received by the Bank using the current market rates.

The carrying amounts of variable rate loans and short-term fixed rate loans are the reasonable approximation of their fair values.

c. Securities and Government bonds

The fair values of amortized cost marketable securities and Government bonds are based on the market prices or broker/dealer price quotations. When this information is not available, the fair value is estimated using quoted market prices for securities with similar credit, maturity and yield characteristics or using internal valuation model.

d. Securities issued, fund borrowings and subordinated loan and securities

The aggregate fair values are based on discounted cash flow model using current market rate for the remaining term to maturity.

47. LABA PER SAHAM

Rekonsiliasi faktor-faktor penentu perhitungan laba per saham dasar untuk tahun yang berakhir tanggal 31 Desember 2024, 2023 dan 2022 adalah sebagai berikut:

47. EARNINGS PER SHARE

The reconciliation of the factors used in calculating the basic earnings per share, for the year ended December 31, 2024, 2023 and 2022 are as follows:

	31 Desember/ *December 31,* 2024		
(i) Laba tahun berjalan	3.007.328	(a)	*Income for the year (i)*
(ii) Rata-rata tertimbang saham biasa yang beredar	14.034	(b)	*Weighted average number of shares outstanding (ii)*
(iii) Laba per saham dasar	214	(a/b)	*Basic earnings per share (iii)*

	31 Desember/ *December 31,* 2023		
(i) Laba tahun berjalan	3.500.988	(a)	*Income for the year (i)*
(ii) Rata-rata tertimbang saham biasa yang beredar	14.022	(b)	*Weighted average number of shares outstanding (ii)*
(iii) Laba per saham dasar	249	(a/b)	*Basic earnings per share (iii)*

	31 Desember/ *December 31,* 2022		
(i) Laba tahun berjalan	3.045.073	(a)	*Income for the year (i)*
(ii) Rata-rata tertimbang saham biasa yang beredar	10.590	(b)	*Weighted average number of shares outstanding (ii)*
(iii) Laba per saham dasar	288	(a/b)	*Basic earnings per share (iii)*

Pada tanggal 31 Desember 2024, 2023, dan 2022, tidak terdapat opsi saham yang beredar, sehingga tidak ada saham dilusian yang perlu diperhitungkan.

On December 31, 2024, 2023, and 2022, there were no outstanding stock options; therefore, there are no diluted shares to be considered.

48. PERJANJIAN DAN KONTINJENSI SIGNIFIKAN

a. Perjanjian Signifikan

Pada tanggal 12 Desember 2024, Bank mengadakan perjanjian dengan PT Nindya Karya sehubungan dengan Jasa Kontraktor Pembangunan Gedung Bank BTN KC Kelapa Gading Square dengan nilai kontrak sebesar Rp132.001.

Pada tanggal 20 November 2024, Bank mengadakan perjanjian dengan PT Brantas Abipraya sehubungan dengan Jasa Kontraktor Pembangunan KC Kebon Jeruk dengan nilai kontrak sebesar Rp121.500.

Pada tanggal 5 November 2024, Bank mengadakan perjanjian dengan PT Pembangunan Perumahan sehubungan dengan Jasa Kontraktor Pekerjaan Pembangunan BTN Eco Park Gandul (Tahap 1) dengan nilai kontrak sebesar Rp322.899.

Pada tanggal 29 Oktober 2024, Bank mengadakan perjanjian dengan PT Binayasa Putrabatara sehubungan dengan Jasa Kontraktor Pekerjaan Renovasi Menara 2 BTN Kuningan dengan nilai kontrak sebesar Rp22.700.

48. SIGNIFICANT AGREEMENTS AND CONTINGENCIES

a. Significant Agreements

On December 12, 2024, the Bank signed an agreement with PT Nindya Karya regarding the Construction Contractor Services of Branch Kelapa Gading Square with a contract value of Rp132,001.

On November 20, 2024, the Bank signed an agreement with PT Brantas Abipraya regarding the Construction Contractor Services of Branch Kebon Jeruk with a contract value of Rp121,500.

On November 5, 2024, the Bank signed an agreement with PT Pembangunan Perumahan regarding the Construction Contractor Services of BTN Eco Park Gandul (fase 1) with a contract value of Rp322,899.

On October 29, 2024, the Bank signed an agreement with PT Binayasa Putrabatara regarding the Renovation Work Contractor Services of Menara 2 Kuningan with a contract value of Rp22,700.

48. PERJANJIAN DAN KONTINJENSI SIGNIFIKAN (lanjutan)

a. Perjanjian Signifikan (lanjutan)

Pada tanggal 28 Oktober 2024, Bank mengadakan perjanjian dengan PT Casa Prima Indonesia sehubungan dengan Jasa Kontraktor Renovasi Kantor KC Tanjungpinang dengan nilai kontrak sebesar Rp13.280.

Pada tanggal 14 Oktober 2024, Bank mengadakan perjanjian dengan PT Brantas Abipraya sehubungan dengan Jasa Kontraktor Pekerjaan Pembangunan Learning Center Bandung (Tahap 1) dengan nilai kontrak sebesar Rp100.500.

Pada tanggal 2 Oktober 2024, Bank mengadakan perjanjian dengan PT Casa Prima Indonesia sehubungan dengan Jasa Kontraktor Renovasi Kantor KC Surabaya dengan nilai kontrak sebesar Rp13.700.

Pada tanggal 24 September 2024, Bank mengadakan perjanjian dengan PT Neocelindo Intibeton sehubungan dengan Jasa Kontraktor Pembangunan Kantor Wilayah 6 dengan nilai kontrak sebesar Rp61.500.

Pada tanggal 26 Juli 2024, Bank mengadakan perjanjian dengan PT Casa Prima Indonesia sehubungan dengan Jasa Kontraktor Pekerjaan Renovasi Relayout KC Banjarmasin dengan nilai kontrak sebesar Rp11.100.

Pada tanggal 8 Juli 2024, Bank mengadakan perjanjian dengan PT Patroon Arsindo sehubungan dengan Jasa Konsultan Perencana *Detail Engineering Design* (DED), RAB, BQ dan RKS Pembangunan Fase 1 BTN Eco Park Gandul dengan nilai kontrak sebesar Rp17.700.

Pada tanggal 24 Juni 2024, Bank mengadakan perjanjian dengan PT Victory Utama Karya sehubungan dengan Jasa Kontraktor Pekerjaan Renovasi Ruang Kerja Divisi Menara 2 BTN dengan nilai kontrak sebesar Rp26.930.

48. SIGNIFICANT AGREEMENTS AND CONTINGENCIES (continued)

a. Significant Agreements (continued)

On October 28, 2024, the Bank signed an agreement with PT Casa Prima Indonesia regarding the Relayout Renovation Work Contractor Services of Tanjungpinang KC with a contract value of Rp13,280

On Octoberr 14, 2024, the Bank signed an agreement with PT Brantas Abipraya regarding the Construction Contractor Services of BTN Learning Center Bandung (fase 1) with a contract value of Rp100,500.

On October 2, 2024, the Bank signed an agreement with PT Casa Prima Indonesia regarding the Relayout Renovation Work Contractor Services of Surabaya KC with a contract value of Rp13,700

On September 24, 2024, the Bank signed an agreement with PT Neocelindo Intibeton regarding the Construction Contractor Services of Regional Office 6 with a contract value of Rp61,500.

On July 26, 2024, the Bank signed an agreement with PT Casa Prima Indonesia regarding the Relayout Renovation Work Contractor Services of Banjarmasin KC with a contract value of Rp11,100.

On July 8, 2024, the Bank signed an agreement with PT Patroon Arsindo regarding the Detail Engineering Design (DED), RAB, BQ and RKS Planning Consultant Services for Phase 1 Development of BTN Eco Park Gandul with a contract value of Rp17,700.

On June 24, 2024, the Bank signed an agreement with PT Victory Utama Karya regarding BTN Tower 2 Division Workspace Renovation Contractor Services with a contract value of Rp26,930

48. PERJANJIAN DAN KONTINJENSI SIGNIFIKAN (lanjutan)

a. Perjanjian Signifikan (lanjutan)

Pada tanggal 24 Juni 2024, Bank mengadakan perjanjian dengan PT Binayasa Putrabatara sehubungan dengan Jasa Kontraktor Pekerjaan Renovasi KC Jakarta Kuningan dan Kantor Wilayah II di Menara 2 BTN dengan nilai kontrak sebesar Rp18.000.

Pada tanggal 31 Mei 2024, Bank mengadakan perjanjian dengan PT Casa Prima Indonesia sehubungan dengan Jasa Kontraktor Pekerjaan Pembangunan Gedung BTN KC Kupang dengan nilai kontrak sebesar Rp47.550.

Pada tanggal 23 Mei 2024, Bank mengadakan perjanjian dengan PT Usaha Gedung Mandiri sehubungan dengan Jasa Kontraktor Pekerjaan Ruang Rapat Lantai 30 dan 32 menara 2 BTN dengan nilai kontrak sebesar Rp11.785.

Pada tanggal 14 Mei 2024, Bank mengadakan perjanjian dengan PT Casa Prima Indonesia sehubungan dengan Jasa Kontraktor Pekerjaan Renovasi KCS Lhokseumawe dengan nilai kontrak sebesar Rp10.500.

Pada tanggal 2 Mei 2024, Bank mengadakan perjanjian dengan PT Integra Dayacipta Grahatama sehubungan dengan Jasa Kontraktor Pekerjaan Pembangunan Kantor Wilayah I dengan nilai kontrak sebesar Rp53.500.

Pada tanggal 20 Februari 2024, Bank mengadakan perjanjian dengan PT Neocelindo Intibeton sehubungan dengan Jasa Kontraktor Pekerjaan Pembangunan Gedung Bank BTN KC Cibubur dengan nilai kontrak sebesar Rp47.280.

Pada tanggal 12 Januari 2024, Bank mengadakan perjanjian dengan PT Casa Prima Indonesia sehubungan dengan Jasa Kontraktor Pekerjaan Pembangunan Gedung Record Center, KCP dan Rumah Dinas Di Lahan Soekarno Hatta Bandung dengan nilai kontrak sebesar Rp41.150.

Pada tanggal 11 Januari 2024, Bank mengadakan perjanjian dengan PT Binayasa Putrabatara sehubungan dengan Jasa Kontraktor Pekerjaan Pembangunan Gedung Bank BTN KC Pematangsiantar dengan nilai kontrak sebesar Rp42.300.

48. SIGNIFICANT AGREEMENTS AND CONTINGENCIES (continued)

a. Significant Agreements (continued)

On June 24, 2024, the Bank signed an agreement with PT Binayasa Putrabatara regarding the Renovation Work Contractor Services for the Jakarta Kuningan KC and Regional Office II at Menara 2 BTN with a contract value of Rp18,000.

On May 31, 2024, the Bank signed an agreement with PT Casa Prima Indonesia regarding BTN KC Kupang Building Construction Work Contractor Services with a contract value of Rp47,550.

On May 23, 2024, the Bank signed an agreement with PT Usaha Gedung Mandiri regarding Contractor Services for Meeting Room Work on Floors 30 and 32 of Tower 2 BTN with a contract value of Rp11,785.

On May 14, 2024, the Bank signed an agreement with PT Casa Prima Indonesia regarding KCS Lhokseumawe Renovation Work Contractor Services with a contract value of Rp10,500.

On May 2, 2024, the Bank signed an agreement with PT Integra Dayabuat Grahatama in connection with Regional Office I Construction Work Contractor Services with a contract value of Rp53,500.

On February 20 2024, the Bank signed an agreement with PT Neocelindo Intibeton regarding Bank BTN KC Cibubur Building Construction Work Contractor Services with contract value of Rp47,280.

On January 12 2024, the Bank signed an agreement with PT Casa Prima Indonesia regarding Contractor Services for the Construction of the Record Center Building, KCP and Official Homes on Soekarno Hatta Land, Bandung with contract value of Rp41,150.

On January 11, 2024, the Bank signed an agreement with PT Binayasa Putrabatara in connection with Bank BTN KC Pematangsiantar Building Construction Work Contractor Services with contract value of Rp42,300.

48. PERJANJIAN DAN KONTINJENSI SIGNIFIKAN (lanjutan)

a. Perjanjian Signifikan (lanjutan)

Pada tanggal 10 Januari 2024, Bank mengadakan perjanjian dengan PT Binayasa Putrabatara sehubungan dengan Sentralisasi Pengadaan Building Management Kantor Wilayah VI dengan nilai kontrak sebesar Rp56.850.

Pada tanggal 10 Januari 2024, Bank mengadakan perjanjian dengan PT Binayasa Putrabatara sehubungan dengan Sentralisasi Pengadaan Building Management Kantor Wilayah IV dengan nilai kontrak sebesar Rp91.500.

Pada tanggal 10 Januari 2024, Bank mengadakan perjanjian dengan PT Binayasa Putrabatara sehubungan dengan Sentralisasi Pengadaan Building Management Kantor Wilayah I dengan nilai kontrak sebesar Rp176.246.

Pada tanggal 19 Desember 2023, Bank mengadakan perjanjian dengan PT Multipolar Technology Tbk sehubungan dengan Pengadaan Ulang PC *Desktop* dan *Notebook* Bank BTN dengan Skema Seat Management dengan nilai kontrak sebesar Rp115.980.

Pada tanggal 4 Desember 2023, Bank mengadakan perjanjian dengan PT Sinergy Informasi Pratama sehubungan dengan Pengadaan *Cash Recycle Machine* (CRM) Tahun 2023 dengan nilai kontrak sebesar Rp133.863.

Pada tanggal 11 Juli 2023, Bank mengadakan perjanjian dengan PT Berkat Manunggal Energi sehubungan dengan pengadaan penggantian genset Gedung Menara BTN dengan nilai kontrak Rp 13.986.

Pada tanggal 15 Maret 2023, Bank mengadakan perjanjian dengan PT Telekomunikasi Indonesia sehubungan dengan pengadaan perpanjangan sewa lokasi *(collocation) Data Center* Sentul tahun ketiga dengan nilai kontrak Rp10.638.

Pada tanggal 20 Februari 2023, Bank mengadakan perjanjian dengan PT Trees Solutions sehubungan dengan pengadaan ulang *Integrated End to End Procurement* dengan nilai kontrak Rp30.669.

48. SIGNIFICANT AGREEMENTS AND CONTINGENCIES (continued)

a. Significant Agreements (continued)

On January 10, 2024, the Bank signed an agreement with PT Binayasa Putrabatara regarding the Centralization of Procurement of Building Management for Region VI Office with contract value of Rp56,850.

On January 10, 2024, the Bank signed an agreement with PT Binayasa Putrabatara regarding the Centralization of Procurement of Building Management for Region IV Office with contract value of Rp91,500.

On January 10, 2024, the Bank signed an agreement with PT Binayasa Putrabatara regarding the Centralization of Procurement of Building Management for Region I Office with contract value of Rp176,246.

On December 19, 2023, Bank signed an agreement with PT Multipolar Technology Tbk in relation to re-procurement of PC Desktop and Notebook with Seat Management Scheme with contract value of Rp115,980.

On December 4, 2023, Bank signed an agreement with PT Sinergy Information Pratama in relation to procurement of Cash Recycle Machine (CRM) 2023 with contract value of Rp133,863.

On July 11, 2023, Bank signed an agreement with PT Berkat Manunggal Energi regarding the procurement of generator replacement for the BTN Tower Building with a contract value of Rp 13,986.

On March 15, 2023, Bank signed an agreement with PT Telekomunikasi Indonesia in connection with the procurement of a third year Sentul Data Center collocation lease with a contract value of Rp10,638.

On February 20, 2023, Bank signed an agreement with PT Trees Solutions in connection with the re-procurement of Integrated End to End Procurement with a contract value of Rp30,669.

48. PERJANJIAN DAN KONTINJENSI SIGNIFIKAN (lanjutan)

a. Perjanjian Signifikan (lanjutan)

Pada tanggal 8 Februari 2023, Bank mengadakan perjanjian dengan PT Multipolar Technology sehubungan dengan pengadaan peremajaan perangkat *network* dan standarisasi LAN Menara Bank BTN dengan nilai kontrak Rp39.575.

Pada tanggal 3 Februari 2023, Bank mengadakan perjanjian dengan PT Binayasa Putra Batara sehubungan dengan Jasa Kontraktor Pekerjaan Pembangunan KC Cirebon dengan nilai kontrak Rp39.100.

Pada tanggal 6 Januari 2023, Bank mengadakan perjanjian dengan PT Binayasa Putra Batara sehubungan dengan Jasa kontraktor pekerjaan renovasi Gedung Pusdiklat Bank BTN Tanah Abang dengan nilai kontrak sebesar Rp30.500.

b. Liabilitas Kontinjensi

Dalam melakukan usahanya, Bank menghadapi berbagai perkara hukum dan tuntutan di mana Bank sebagai tergugat, terutama sehubungan dengan kepatuhan dengan kontrak. Walaupun belum ada kepastian yang jelas, Bank berpendapat bahwa berdasarkan informasi yang ada dan keputusan terakhir dari perkara bahwa tuntutan hukum ini tidak akan berdampak secara material pada operasi, posisi keuangan atau tingkat likuiditas Bank.

Pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022, Bank telah membentuk cadangan (disajikan dalam akun "Liabilitas Imbalan Kerja dan Lain-lain") untuk sejumlah tuntutan hukum yang belum diputuskan masing-masing adalah sebesar Rp66.205, Rp95.209 dan Rp160.209.

Manajemen berpendapat bahwa jumlah cadangan yang dibentuk atas kemungkinan timbulnya kerugian akibat tuntutan hukum yang belum diputuskan atau masih dalam proses tersebut telah memadai.

48. SIGNIFICANT AGREEMENTS AND CONTINGENCIES (continued)

a. Significant Agreements (continued)

On February 8, 2023, Bank signed an agreement with PT Multipolar Technology in connection with the procurement of network equipment upgrades and standardization of Bank BTN Tower LAN with a contract value of Rp39,575.

On February 3, 2023, Bank signed an agreement with PT Binayasa Putra Batara in relation to contractor services of construction for the Bank BTN KC Cirebon Building with contract value of Rp39,100.

On January 6, 2023, Bank signed an agreement with PT Binayasa Putra Batara in relation to contractor services of renovation for the Bank BTN Tanah Abang Pusdiklat Building with contract value of Rp30,500.

b. Contingent Liabilities

In conducting its business, the Bank is a defendant with various litigation proceedings and legal claims mainly with respect to matters of contractual compliance. Although there is no clear assurance yet, the Bank believes that based on information currently available, the ultimate resolution of these legal proceedings and legal claims will not likely have a material effect on the operations, financial position or liquidity level of Bank

As of December 31, 2024, 2023 and 2022, Bank has established an allowance (included in "Employee Benefits and Other Liabilities") for several pending lawsuits filed against Bank amounted to Rp66,205, Rp95,209 and Rp160,209.

Management believes that the allowance is adequate to cover possible losses arising from pending litigations or legal claims that are currently in progress.

49. PERNYATAAN STANDAR AKUNTANSI KEUANGAN YANG DIKELUARKAN DAN DIREVISI

Amandemen dan Penyesuaian Pernyataan Standar Akuntansi Keuangan (PSAK) baru yang telah disahkan oleh Dewan Standar Akuntansi Keuangan (DSAK) - Ikatan Akuntan Indonesia (IAI), tetapi belum berlaku efektif untuk laporan keuangan selama tahun berjalan diungkapkan di bawah ini.

Bank bermaksud untuk menerapkan amendemen dan penyesuaian PSAK tersebut, jika dipandang relevan, saat telah menjadi efektif. Berlaku efektif setelah tanggal 1 Januari 2025:

Berlaku efektif pada atau setelah tanggal 1 Januari 2025:

a. Amandemen PSAK No. 221 “Pengaruh Perubahan Kurs Valuta Asing tentang Kekurangan Ketertukaran”. Penerapan lebih dini diperkenankan.

Berlaku efektif pada atau setelah tanggal 1 Januari 2026:

a. PSAK 109, “Instrumen Keuangan” dan PSAK 107 “Instrumen Keuangan Pengungkapan tentang Klasifikasi dan Pengukuran Instrumen Keuangan”.

   Amendemen ini menambahkan dan mengklarifikasi ketentuan dalam PSAK 109 terkait penghentian pengakuan liabilitas keuangan, serta mengklarifikasi penilaian karakteristik arus kas untuk aset keuangan dengan fitur *ESG-linked*, aset keuangan dengan fitur non-recourse, dan instrumen yang terikat secara kontraktual seperti tranche. Amendemen ini juga mengubah ketentuan dalam PSAK 107 terkait persyaratan pengungkapan investasi pada instrumen ekuitas yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan menambah ketentuan terkait instrumen keuangan dengan persyaratan kontraktual yang mengubah waktu atau jumlah arus kas kontraktual.

Pada saat penerbitan laporan keuangan, Bank masih mempelajari dampak yang mungkin timbul dari penerapan standar revisi tersebut serta pengaruhnya pada laporan keuangan Bank.

49. REVISED AND ISSUED STATEMENTS OF FINANCIAL ACCOUNTING STANDARDS

The amendments and adjustments to Statement of Financial Accounting Standards (SFAS) that have been approved by the Financial Accounting Standards Board (IFAS) - Indonesian Institute of Accountants (IAI), but have not been effective for financial statements during the year are disclosed below.

The Bank intends to implement the amendments and adjustments to the SFAS, if it is deemed relevant, when they become effective.

Effective on or after January 1, 2025:

a. Amendment to SFAS No. 221 “The Effect of Changes in Foreign Exchange Rates on the Lack of Convertibility”. Early application is permitted.

Effective on or after January 1, 2026:

a. SFAS 109, "Financial Instruments," and SFAS 107, "Financial Instruments: Disclosures about the Classification and Measurement of Financial Instruments."

   These amendments adding and clarify statement in SFAS 109 regarding derecognition of financial liabilities, as well as clarify the assessment of cash flow characteristics for financial assets with ESG-linked features, financial assets with non-recourse features, and contractually bound instruments such as tranches. The amendments also revise the statement in SFAS 107 regarding the disclosure requirements for investments in equity instruments measured at fair value through other comprehensive income and adding statament related to financial instruments with contractual terms that alter the timing or amount of contractual cash flows.

As at the authorization date of this financial statements, the Bank is still evaluating the potential impact of these revised standards to the Bank's financial statements.

50. TAMBAHAN INFORMASI ARUS KAS

50. SUPPLEMENTARY CASH FLOW INFORMATION

Perubahan pada liabilitas yang timbul dari aktivitas pendanaan pada laporan arus kas adalah sebagai berikut:

Changes in liabilities arising from financing activities in the cash flow statement are as follows:

	1 Januari/ *January 1*, 2024	Arus Kas/*Cash Flow* Penerimaan/ *Receipts*	Pembayaran/ *Payment*	Perubahan Non-Kas/ *Non-Cash Changes*	31 Desember/ *December 31*, 2024	
Surat berharga yang diterbitkan	8.272.098	680.913	(3.572.500)	64.013	5.444.524	*Securities issued*
Efek-efek yang dijual dengan janji dibeli kembali	-	143.153.604	(139.744.766)	588	3.409.426	*Securities Sold Under Repurchase Agreements*
Pinjaman yang diterima	33.762.089	11.144.193	(11.385.262)	(35.936)	33.485.084	*Fund Borrowings*
Pinjaman Subordinasi dan efek-efek subordinasi	9.112.837	-	(3.000.000)	215.268	6.328.105	*Subordinated loans and securities*
Pembayaran Liabilitas Sewa	186.696	-	(93.408)	72.418	165.706	*Payment of Lease liability*
Total	**51.333.720**	**154.978.710**	**(157.795.936)**	**316.351**	**48.832.845**	***Total***

	1 Januari/ *January 1*, 2023	Arus Kas/*Cash Flow* Penerimaan/ *Receipts*	Pembayaran/ *Payment*	Perubahan Non-Kas/ *Non-Cash Changes*	31 Desember/ *December 31*, 2023	
Surat berharga yang diterbitkan	8.652.260	2.449.019	(2.769.764)	(59.417)	8.272.098	*Securities issued*
Efek-efek yang dijual dengan janji dibeli kembali	-	67.691.353	(67.766.743)	75.390	-	*Securities Sold Under Repurchase Agreements*
Pinjaman yang diterima	24.821.005	11.185.162	(2.187.576)	(56.502)	33.762.089	*Fund Borrowings*
Pinjaman Subordinasi dan efek-efek subordinasi	9.158.219	-	-	(45.382)	9.112.837	*Subordinated loans and securities*
Pembayaran Liabilitas Sewa	167.633	-	(81.973)	101.036	186.696	*Payment of Lease liability*
Total	**42.799.117**	**81.325.534**	**(72.806.056)**	**15.125**	**51.333.720**	***Total***

	1 Januari/ *January 1*, 2022	Arus Kas/*Cash Flow* Penerimaan/ *Receipts*	Pembayaran/ *Payment*	Perubahan Non-Kas/ *Non-Cash Changes*	31 Desember/ *December 31*, 2022	
Surat Berharga yang Diterbitkan	12.371.708	1.541.330	(5.263.000)	2.222	8.652.260	*Securities Issued*
Efek-efek yang dijual dengan janji dibeli kembali	-	592.326	(592.326)	-	-	*Securities Sold Under repurchase agreements*
Pinjaman yang diterima	22.062.291	11.814.826	(9.095.884)	39.772	24.821.005	*Fund borrowings*
Pinjaman subordinasi dan efek-efek subordinasi	8.759.744	-	-	398.475	9.158.219	*Subordinated loans and securities*
Pembayaran liabilitas sewa	126.348	-	(84.983)	126.268	167.633	*Payment of Lease liability*
Total	**43.320.091**	**13.948.482**	**(15.036.193)**	**566.737**	**42.799.117**	***Total***

51. INFORMASI TAMBAHAN

Informasi tambahan berikut merupakan informasi yang tidak dipersyaratkan untuk diungkapkan oleh Standar Akuntansi Keuangan di Indonesia. Informasi tersebut disusun sesuai dengan regulasi Otoritas Jasa Keuangan.

a. Giro Wajib Minimum (GWM)

Rasio GWM Bank pada tanggal 31 Desember 2024, 2023 dan 2022 adalah sebagai berikut:

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Konvensional				*Conventional*
Rupiah				*Rupiah*
Utama	5,38%	6,04%	8,28%	*Primary*
Harian	0,38%	0,24%	0,18%	*Daily*
Rata-rata	5,00%	5,80%	8,10%	*Average*
PLM	12,73%	9,66%	16,17%	*PLM*
Dolar Amerika Serikat	4,18%	4,40%	4,13%	*United States Dollar*
Syariah				*Sharia*
Rupiah	4,70%	6,10%	7,76%	*Rupiah*

Saldo giro pada Bank Indonesia disediakan untuk memenuhi persyaratan Giro Wajib Minimum (GWM) dari Bank Indonesia.

Rasio GWM pada tanggal 31 Desember 2024, 2023 dan 2022 dihitung berdasarkan Peraturan Bank Indonesia No. 20/3/PBI/2018 tanggal 29 Maret 2018 yang telah diubah beberapa kali, terakhir dengan PBI No. 24/4/PBI/2022 tanggal 25 Februari 2022. PBI tersebut dijelaskan oleh Peraturan Anggota Dewan Gubernur (PADG) No. 20/10/PADG/2018 tanggal 31 Mei 2018 sebagaimana telah diubah beberapa kali dengan PADG No.20/30/PADG/2018 tanggal 30 November 2018, PADG No. 21/14/PADG/2019 tanggal 26 Juni 2019 sebagaimana telah diubah beberapa kali dengan PADG No. 21/27/PADG/2019 tanggal 26 Desember 2019, PADG No. 22/2/PADG/2020 tanggal 13 Maret 2020, PADG No. 22/10/PADG/2020 tanggal 30 April 2020, PADG No. 22/19/PADG/2020 tanggal 29 Juli 2020, PADG No.23/27/PADG/2021 tanggal 21 Desember 2021, PADG No. 24/3/PADG/2022 tanggal 1 Maret 2022, PADG No. 24/8/PADG/2022 tanggal 30 Juni 2022, PADG No. 2 Tahun 2023 tanggal 24 Maret 2023 dan perubahan terakhir pada PADG No. 12 Tahun 2023 tanggal 1 Oktober 2023 tentang "Giro Wajib Minimum dalam Rupiah dan Valuta Asing bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah".

51. ADDITIONAL INFORMATION

The following additional information is information that is not required to be disclosed by Indonesian Accounting Standards. Such additional information mas prepared in accordance with regulations of Financial Service Authority.

a. Minimum Reserve Requirements (GWM)

The minimum reserve requirement ratios of the Bank as of December 31, 2024, 2023 and 2022, are as follows:

Current accounts with Bank Indonesia are maintained to comply with Bank Indonesia's Minimum Legal Reserve Requirements (GWM).

The calculation of the GWM ratios as of December 31, 2024, 2023 and 2022 is based on Bank Indonesia regulation (PBI) No. 20/3/PBI/2018 dated March 29, 2018, which has been amended several times, the latest with PBI No. 24/4/PBI/2022 dated February 25, 2022. The PBI is explained by Regulations of Members of the Board of Governors (PADG) No. 20/10/PADG/2018 dated May 31, 2018 which has been amended several times with PADG No. 20/30/PADG/2018 dated November 30, 2018, PADG No. 21/14/PADG/2019 dated June 26, 2019 which has been amended several times with PADG No. 21/27/PADG/2019 dated December 26, 2019, PADG No. 22/2/PADG/2020 dated March 13 2020 PADG No. 22/10/PADG/2020 dated April 30, 2020, PADG No. 22/19/PADG/2020 dated July 29, 2020, PADG No.23/27/PADG/2021 dated December 21, 2021, PADG No. 24/3/PADG/2022 dated March 1, 2022, PADG No. 24/8/PADG/2022 dated June 30, 2022, PADG No. 2 year of 2023 dated March 24, 2023 and the latest amendment by PADG No.12 year of 2023 dated October 1, 2023 regarding "Minimum Statutory Reserve Requirements in Rupiah and Foreign Currencies of Conventional Commercial Banking, Sharia Commercial Banking and Sharia Business Units".

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut merupakan informasi yang tidak dipersyaratkan untuk diungkapkan oleh Standar Akuntansi Keuangan di Indonesia. Informasi tersebut disusun sesuai dengan regulasi Otoritas Jasa Keuangan. (lanjutan)

a. Giro Wajib Minimum (GWM) (lanjutan)

Bank Indonesia melakukan penguatan kebijakan insentif untuk mendorong peranan perbankan dalam pembiayaan kepada sektor prioritas sesuai Peraturan Bank Indonesia (PBI) No. 24/5/PBI/2022 tentang Insentif bagi Bank yang Memberikan Penyediaan Dana untuk Kegiatan Ekonomi Tertentu dan Inklusif tanggal 25 Februari 2022, sebagaimana diatur lebih lanjut melalui PADG No. 24/4/PADG/2022 tanggal 1 Maret 2022 sebagaimana telah diubah dengan perubahan terakhir PADG No. 1 Tahun 2023 tanggal 15 Februari 2023 dan perubahan terakhir PADG No. 11 tahun 2023 tanggal 27 September 2023 tentang "Peraturan Pelaksanaan Kebijakan Insentif Likuiditas Makroprudensial" Bank Indonesia memberikan insentif berupa kelonggaran atas kewajiban pemenuhan GWM dalam rupiah yang wajib dipenuhi secara harian sebesar 3,20% (tiga koma dua persen) dan kewajiban pemenuhan GWM dalam rupiah berdasarkan prinsip syariah sebesar 2,50% (dua koma lima persen). Insentif bagi Bank yang melakukan penyediaan dana untuk kegiatan ekonomi tertentu dan inklusif ditetapkan oleh Bank Indonesia dan berlaku mulai 1 Desember 2023 sampai dengan 29 Februari 2024.

Pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022, sesuai dengan ketentuan Bank Indonesia tersebut di atas, Bank harus memenuhi persyaratan GWM Utama dalam Rupiah masing-masing sebesar 5,00%, 5,80% dan 8,10%, sedangkan untuk mata uang asing masing-masing sebesar 4,00%, 4,00% dan 4,00%. Untuk PLM adalah sebesar 4,00%, 5,00% dan 6,00% dalam Rupiah pada tanggal 31 Desember 2024, 2023 dan 2022.

51. ADDITIONAL INFORMATION (continued)

The following additional information is information that is not required to be disclosed by Indonesian Accounting Standards. Such additional information mas prepared in accordance with regulations of Financial Service Authority. (continued)

a. Minimum Reserve Requirements (GWM) (continued)

Bank Indonesia has strengthened incentive policy to stimulate the role of banks in financing priority sectors in accordance with Bank Indonesia Regulation (PBI) No. 24/5/PBI/2022 regarding Incentives for Banks Providing Funds for Certain and Inclusive Economic Activities dated February 25, 2022, as further regulated through PADG No. 24/4/PADG/2022 dated March 1, 2022 as amended by the latest amendment of PADG No. 1 of 2023 dated February 15, 2023, and the latest amendment by PADG No. 11 year of 2023 dated September 27, 2023 regarding "Regulations for Implementing Macroprudential Liquidity Incentive Policy" Bank Indonesia provides incentives in the form of leniency on the obligation to fulfill the statutory reserve in rupiah which must be fulfilled on a daily basis of 3.20% (three point two percent) and the obligation to fulfill the statutory reserve in rupiah based on sharia principles is 2.50% (two point five percent). This incentive is given to Banks that provide funds for certain and inclusive economic activities as stipulated by Bank Indonesia and are valid from December 1, 2023 to February 29, 2024.

As of December 31, 2024, 2023 and 2022, based on the above Bank Indonesia regulations, the Bank is required to maintain primary GWM in Rupiah amounting to 5.00%, 5.80% and 8.10%, respectively, while GWM for foreign currency amounting to 4.00%, 4.00% and 4.00%, respectively. PLM amounting to 4,00%, 5.00% and 6.00% in Rupiah as of December 31, 2024, 2023 and 2022.

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut merupakan informasi yang tidak dipersyaratkan untuk diungkapkan oleh Standar Akuntansi Keuangan di Indonesia. Informasi tersebut disusun sesuai dengan regulasi Otoritas Jasa Keuangan. (lanjutan)

a. Giro Wajib Minimum (GWM) (lanjutan)

Pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022, sesuai dengan ketentuan Bank Indonesia tersebut berdasarkan prinsip syariah, Bank harus memenuhi persyaratan GWM dalam Rupiah masing-masing sebesar 7,50%, 5,00% dan 7,50%. Untuk mata uang asing masing-masing sebesar 1,00%, 1,00% dan 1,00%.

Pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022, Bank juga harus memenuhi Peraturan Bank Indonesia (PBI) No. 20/4/PBI/2018 tanggal 29 Maret 2018 tentang "Rasio Intermediasi Makroprudensial dan Penyangga Likuiditas Makroprudensial bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah" sebagaimana telah diubah dengan PBI No. 21/12/PBI/2019 tanggal 25 November 2019, PBI No. 22/17/PBI/2020 tanggal 30 September 2020, dan PBI No.24/16/PBI/2022 tanggal 1 November 2022 yang dijelaskan melalui Peraturan Anggota Dewan Gubernur No.21/22/PADG/2019 tanggal 28 November 2019 yang telah diubah dengan PADG No. 21/11/PADG/2020 tanggal 29 April 2020, PADG 22/30/PADG/2020 tanggal 5 Oktober 2020, PADG No. 23/7/PADG/2021 tanggal 26 April 2021, PADG No. 23/31/PADG/2021 tanggal 31 Desember 2021 dan perubahan terakhir PADG No. 24/14/PADG/2022 tanggal 1 November 2022 tentang "Rasio Intermediasi Makroprudensial dan Penyangga Likuiditas Makroprudensial bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah".

GWM Primer adalah simpanan minimum yang wajib dipelihara oleh Bank dalam bentuk saldo Rekening Giro pada Bank Indonesia. GWM Sekunder dan Penyangga Likuiditas Makroprudensial (PLM) adalah cadangan minimum yang wajib dipelihara oleh Bank berupa Sertifikat Bank Indonesia (SBI), Surat Utang Negara (SUN), Surat Berharga Syariah Negara (SBSN) dan/atau excess reserve yang merupakan kelebihan saldo Rekening Giro Rupiah Bank dari GWM Primer, GWM LFR dan Rasio Intermediasi Makroprudensial (RIM).

51. ADDITIONAL INFORMATION (continued)

The following additional information is information that is not required to be disclosed by Indonesian Accounting Standards. Such additional information mas prepared in accordance with regulations of Financial Service Authority. (continued)

a. Minimum Reserve Requirements (GWM) (continued)

As of December 31, 2024, 2023 and 2022, based on the Bank Indonesia regulations, for sharia principle, The Bank is required to maintain GWM in Rupiah of 7.50%, 5.00% and 7.50%. For foreign currencies of 1.00%, 1.00% and 1.00%, respectively.

As of December 31, 2024, 2023 and 2022, The Bank must also comply with Bank Indonesia Regulation (PBI) No. 20/4/PBI/2018 dated March 29, 2018 regarding "Macroprudential Intermediation Ratios and Macroprudential Liquidity Buffers for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Unit" which has been amended with PBI 21/12/PBI/2019 dated November 25, 2019, PBI No. 22/17/PBI/2020 dated September 30, 2020 and PBI 24/16/PBI/2022 dated November 1, 2022, which is explained through PADG No. 21/22/PADG/2019 dated November 28, 2019 which has been amended with PADG No. 21/11/PADG/2020 dated April 29, 2020, PADG No. 22/30/PADG/2020 dated October 5, 2020, PADG No. 23/7/PADG/2021 dated April 26, 2021, PADG No. 23/31/PADG/2021 dated December 31, 2021 and the latest amendment by PADG 24/14/PADG/2022 dated November 1, 2022 concerning "Macroprudential Intermediation Ratio and Macroprudential Liquidity Buffer for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units".

Primary Minimum Statutory Reserve is a minimum reserve that should be maintained by the Bank in Current Accounts with Bank Indonesia. Secondary Minimum Statutory Reserve and Macroprudential Liquidity Buffer are the minimum reserves that should be maintained by the Bank which comprise of Certificates of Bank Indonesia (SBI), Government Debenture Debt (SUN), Sharia Government Securities (SBSN), and/or excess reserve which represents the excess reserve of the Bank's Current Accounts in Rupiah over the Primary Minimum Statutory Reserve, Minimum Statutory Reserve on LFR and Macroprudential Intermediation Ratio (RIM).

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut merupakan informasi yang tidak dipersyaratkan untuk diungkapkan oleh Standar Akuntansi Keuangan di Indonesia. Informasi tersebut disusun sesuai dengan regulasi Otoritas Jasa Keuangan. (lanjutan)

a. Giro Wajib Minimum (GWM) (lanjutan)

GWM LFR dan RIM adalah tambahan simpanan minimum yang wajib dipelihara oleh Bank dalam bentuk saldo Rekening Giro pada Bank Indonesia, jika LFR dan RIM target Bank Indonesia (84%) atau jika di atas maksimum LFR dan RIM target BI (94%) dan Kewajiban Penyediaan Modal Minimum (KPMM) Bank lebih kecil dari KPMM Insentif BI sebesar 14%.

Bank telah memenuhi ketentuan Bank Indonesia tentang Giro Wajib Minimum pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022.

Sisa umur jatuh tempo atas giro pada Bank Indonesia dikategorikan sebagai kurang dari satu bulan (Catatan 45).

b. Klasifikasi Berdasarkan Kolektibilitas OJK

1) Giro Pada Bank Lain

Pada tanggal 31 Desember 2024, 2023 dan 2022, kolektibilitas giro pada bank lain sesuai Peraturan OJK adalah sebagai berikut:

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Lancar	5.949.997	2.201.620	1.470.526	*Current*
Macet	1.749	1.778	1.731	*Loss*
Total	5.951.746	2.203.398	1.472.257	*Total*
Dikurangi cadangan kerugian penurunan nilai	(2.571)	(1.804)	(1.747)	*Less allowance for impairment losses*
Neto	**5.949.175**	**2.201.594**	**1.470.510**	***Net***

2) Penempatan pada bank lain dan Bank Indonesia

Seluruh penempatan pada bank lain dan Bank Indonesia pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022 sesuai Peraturan OJK diklasifikasikan sebagai lancar.

51. ADDITIONAL INFORMATION (continued)

The following additional information is information that is not required to be disclosed by Indonesian Accounting Standards. Such additional information mas prepared in accordance with regulations of Financial Service Authority. (continued)

a. Minimum Reserve Requirements (GWM) (continued)

Minimum Statutory Reserve on LFR and RIM is the additional reserve that should be maintained by the Bank in the form of Current Accounts with Bank Indonesia, if the Bank's LFR and RIM is below the minimum of LFR and RIM targeted by Bank Indonesia (84%) or if the Bank's LFR and RIM is above the maximum of LFR and RIM targeted by BI (94%) and the Capital Adequacy Ratio (CAR) is below BI requirement of 14%.

The Bank has complied with Bank Indonesia regulations concerning the minimum reserve requirements as of December 31, 2024, 2023 and 2022.

The remaining period of current accounts with Bank Indonesia is categorized as less than one month (Note 45).

b. Classification Based on OJK Collectibility

1) Current accounts with Other Banks

As of December 31, 2024, 2023 and 2022, the collectibility of current accounts with other banks according to Financial Service Authority Rule collectibility are as follows:

2) Placements with other banks and Bank Indonesia

All placements with other banks and Bank Indonesia as of December 31, 2024, 2023 and 2022, according to Financial Service Authority Rule collectibility are classified as current.

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut merupakan informasi yang tidak dipersyaratkan untuk diungkapkan oleh Standar Akuntansi Keuangan di Indonesia. Informasi tersebut disusun sesuai dengan regulasi Otoritas Jasa Keuangan. (lanjutan)

b. Klasifikasi Berdasarkan Kolektibilitas OJK (lanjutan)

3) Efek-efek

Kolektibilitas efek-efek sesuai Peraturan OJK adalah sebagai berikut:

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Lancar	25.260.713	5.199.375	1.628.411	*Current*
Dalam Perhatian Khusus	42.859	50.695	36.675	*Special Mention*
Kurang Lancar	4.360	4.644	3.148	*Substandard*
Diragukan	5.369	5.769	5.436	*Doubtful*
Macet	50.109	45.390	49.498	*Loss*
Total	25.363.410	5.305.873	1.723.168	*Total*
Cadangan kerugian penurunan nilai	(787)	(22.903)	(2.399)	*Allowance for impairment losses*
Neto	**25.362.623**	**5.282.970**	**1.720.769**	***Net***

4) Efek-efek yang Dibeli dengan Janji Dijual Kembali

Seluruh efek-efek yang Dibeli dengan Janji Dijual Kembali pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022 sesuai Peraturan OJK diklasifikasikan sebagai lancar.

5) Tagihan akseptasi

Sesuai Peraturan OJK, pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022, semua tagihan akseptasi diklasifikasikan sebagai lancar.

6) Tagihan dan liabilitas derivatif

Sesuai Peraturan OJK, pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022, semua tagihan dan liabilitas derivatif diklasifikasikan sebagai lancar.

51. ADDITIONAL INFORMATION (continued)

The following additional information is information that is not required to be disclosed by Indonesian Accounting Standards. Such additional information mas prepared in accordance with regulations of Financial Service Authority. (continued)

b. Classification Based on OJK Collectibility (continued)

3) Securities

The collectibility of securities according to Financial Service Authority Rule collectibility are as follows:

4) Securities Purchased under Agreement to Resell

All securities purchased under agreement to resell Indonesia as of December 31, 2024, 2023 and 2022, according to Financial Service Authority Rule collectibility are classified as current.

5) Acceptance receivables

According to Financial Service Authority Rule collectibility All acceptances receivables were classified as current as of December 31, 2024, 2023 and 2022.

6) Derivative receivable and payables

According to Financial Service Authority Rule collectability, all derivative receivable and payables were classified as current as of December 31, 2024, 2023 and 2022.

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

b. Klasifikasi Berdasarkan Kolektibilitas OJK (lanjutan)

7) Kredit yang Diberikan dan Pembiayaan/ Piutang Syariah

Kolektibilitas kredit yang diberikan dan pembiayaan/piutang syariah sesuai Peraturan OJK adalah sebagai berikut:

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: *(continued)*

b. Classification Based on OJK Collectibility (continued)

7) Loans and Sharia Financing/Receivables

The collectibility of loans and sharia financing/receivables according to Financial Service Authority Rule collectibility are as follows:

	31 Desember/*December 31*, 2024		31 Desember/*December 31*, 2023		31 Desember/*December 31*, 2022		
	Nilai tercatat/ *Carrying amount*	Cadangan kerugian penurunan nilai/ *Allowance for impairment losses*	Nilai tercatat/ *Carrying amount*	Cadangan kerugian penurunan nilai/ *Allowance for impairment losses*	Nilai tercatat/ *Carrying amount*	Cadangan kerugian penurunan nilai/ *Allowance for impairment losses*	
Konvensional							*Conventional*
Individual							*Individual*
Lancar	8.100.760	1.104.716	8.399.059	1.916.967	6.349.613	1.487.285	*Current*
Dalam perhatian khusus	3.747.701	1.405.247	4.016.175	2.562.023	3.094.462	2.261.194	*Special mention*
Kurang lancar	38.480	37.880	113.803	96.719	210.002	43.087	*Substandard*
Diragukan	-	-	911	849	287.925	250.586	*Doubtful*
Macet	1.577.601	1.070.858	3.281.664	2.581.015	4.173.552	3.168.627	*Loss*
	13.464.542	3.618.701	15.811.612	7.157.573	14.115.554	7.210.779	
Kolektif							*Collective*
Lancar	264.960.207	2.644.832	255.215.275	3.570.880	233.227.549	4.086.908	*Current*
Dalam perhatian khusus	27.214.026	2.529.447	19.790.203	1.370.850	14.961.502	1.189.242	*Special mention*
Kurang lancar	566.796	205.792	279.523	97.243	223.217	48.405	*Substandard*
Diragukan	1.748.284	555.970	537.521	186.708	505.684	127.977	*Doubtful*
Macet	6.126.250	2.173.192	4.949.726	1.808.282	3.624.059	1.441.603	*Los*
	300.615.563	8.109.233	280.772.248	7.033.963	252.542.011	6.894.135	
Syariah							*Sharia*
Lancar	39.536.826	783.326	33.636.263	75.269	28.499.767	197.833	*Current*
Dalam perhatian khusus	3.095.410	35.624	2.592.266	439.407	2.078.511	326.315	*Special mention*
Kurang lancar	266.796	9.417	177.947	177.947	146.997	146.997	*Substandard*
Diragukan	191.485	15.356	139.381	139.381	94.373	94.373	*Doubtful*
Macet	802.310	485.530	568.424	568.424	804.491	804.491	*Loss*
	43.892.827	1.329.253	37.114.281	1.400.428	31.624.139	1.570.009	
Total	**357.972.932**	**13.057.187**	**333.698.141**	**15.591.964**	**298.281.704**	**15.674.923**	***Total***

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

b. Klasifikasi Berdasarkan Kolektibilitas OJK (lanjutan)

7) Kredit yang Diberikan dan Pembiayaan/ Piutang Syariah (lanjutan)

Rasio kredit dan pembiayaan/piutang syariah yang diklasifikasikan non-performing terhadap jumlah kredit dan pembiayaan/piutang syariah (metode gross dan neto) adalah seperti yang terlihat pada tabel berikut:

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

b. Classification Based on OJK Collectibility (continued)

7) Loans and Sharia Financing/Receivables (continued)

The ratios of non-performing loans and sharia financing/receivables to total loans and sharia financing/receivables (using the gross and net methods) are shown in the following table:

	31 Desember/*December 31*,2024		31 Desember/*December 31*,2023		31 Desember/*December 31*,2022		
Kolektibilitas	**Konvensional/ *Conventional***	**Syariah/ *Sharia***	**Konvensional/ *Conventional***	**Syariah/ *Sharia***	**Konvensional/ *Conventional***	**Syariah/ *Sharia***	***Collectibility***
Kurang Lancar	605.276	266.796	393.326	177.947	433.219	146.997	*Substandard*
Diragukan	1.748.284	191.485	538.432	139.381	793.609	94.373	*Doubtful*
Macet	7.703.851	802.309	8.231.390	568.424	7.797.611	804.491	*Loss*
	10.057.411	1.260.590	9.163.148	885.752	9.024.439	1.045.861	
Cadangan kerugian Penurunan nilai atas NPL/NPF	(4.043.692)	(510.303)	(4.770.816)	(885.752)	(5.080.285)	(1.045.861)	*Allowance for impairment losses for NPL/NPF*
	6.013.719	750.287	4.392.332	-	3.944.154	-	
Kredit yang diberikan dan pembiayaan/ piutang syariah	314.080.105	43.892.827	296.583.860	37.114.281	266.657.565	31.624.139	*Loans and sharia financing/ receivables*
% *Non-performing* kredit yang diberikan dan pembiayaan/ piutang syariah - *Gross* (*Gross* NPL/NPF)	3,20%	2,87%	3,09%	2,39%	3,38%	3,31%	*% of Non-performing loans and sharia financing/ receivables - Gross (Gross NPL/NPF)*
% *Non-performing* kredit yang diberikan dan pembiayaan/ piutang syariah - Neto (Neto NPL/NPF)	1,91%	1,71%	1,48%	0%	1,48%	0%	*% of Non-performing loans and sharia financing/ receivables - Net (Net NPL/NPF)*

Informasi pokok lainnya

NPL/NPF *Gross* dihitung dengan membagi antara sindikasi jumlah kredit/ pembiayaan/piutang syariah bermasalah dengan jumlah kredit/pembiayaan /piutang Syariah.

NPL/NPF Neto dihitung dengan membagi antara jumlah kredit/pembiayaan/piutang syariah bermasalah setelah dikurangi cadangan kerugian dan jumlah kredit/ pembiayaan/piutang syariah keseluruhan.

Other significant information

The Gross NPL/NPF are computed by dividing the total non-performing loans/ sharia financing/receivables by the total loans and sharia financing/receivables.

The Net NPL/NPF ratios are computed by dividing the total non-performing loans/sharia financing/receivables, net of allowance for possible losses, by the total loans and sharia financing/receivables.

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

b. Klasifikasi Berdasarkan Kolektibilitas OJK (lanjutan)

7) Kredit yang Diberikan dan Pembiayaan/ Piutang Syariah (lanjutan)

Informasi pokok lainnya (lanjutan)

Rasio NPL/NPF *Gross* (total konvensional dan syariah) adalah 3,16%, 3,01% dan 3,38% masing-masing pada tanggal 31 Desember 2024, 2023 dan 2022.

Rasio NPL/NPF Neto (total konvensional dan syariah) adalah 1,89%, 1,32% dan 1,32% masing-masing pada tanggal 31 Desember 2024, 2023 dan 2022.

Kredit yang diberikan dan pembiayaan/ piutang syariah *non-performing* berdasarkan sektor ekonomi:

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

b. Classification Based on OJK Collectibility (continued)

7) Loans and Sharia Financing/Receivables (continued)

Other significant information (continued)

The Gross NPL/NPF Ratio (total conventional and sharia) is 3.16%, 3.01% and 3.38% as of December 31, 2024, 2023 and 2022, respectively.

The Net NPL/NPF Ratio (total conventional and sharia) is 1.89%, 1.32% and 1.32% as of December 31, 2024, 2023 and 2022, respectively.

Non-performing loans and sharia financing/receivables by economic sectors:

	31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Konvensional				*Conventional*
Perumahan	8.608.669	8.315.467	7.794.092	*Property*
Konstruksi	1.044.179	534.740	904.621	*Construction*
Jasa Usaha	165.598	191.925	79.417	*Business service*
Perdagangan, restoran dan hotel	184.495	87.920	173.739	*Trading, restaurant and hotel*
Pertambangan	12.717	14.147	15.397	*Mining*
Jasa-jasa sosial	10.519	11.676	28.436	*Social service*
Transportasi, Pergudangan, dan Komunikasi	1.936	2.058	6.387	*Transportation, warehousing, and communication*
Manufaktur	17.363	1.235	715	*Manufacturing*
Listrik, gas dan air	2.812	959	6.141	*Electricity, gas and water*
Pertanian	767	117	60	*Farming*
Lain-lain*)	8.356	2.904	15.434	*Other*)
	10.057.411	9.163.148	9.024.439	
Syariah				*Sharia*
Perumahan	835.243	473.449	297.621	*Property*
Konstruksi	315.066	283.130	573.570	*Construction*
Jasa Usaha	110.281	129.173	174.670	*Business service*
	1.260.590	885.752	1.045.861	
Total	11.318.001	10.048.900	10.070.300	*Total*
Dikurangi Cadangan kerugian penurunan nilai	(4.553.995)	(5.656.568)	(6.126.146)	*Less allowance for impairment losses*
Neto	**6.764.006**	**4.392.332**	**3.944.154**	***Net***

*) Terdiri dari rumah tangga dan sektor ekonomi lainnya

**) Consists of household and other economic sectors*

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

b. Klasifikasi Berdasarkan Kolektibilitas OJK (lanjutan)

7) Kredit yang Diberikan dan Pembiayaan/ Piutang Syariah (lanjutan)

Informasi pokok lainnya (lanjutan)

Pada tanggal 31 Desember 2024, 2023 dan 2022, tidak terdapat pelanggaran maupun pelampauan Batas Maksimum Pemberian Kredit (BMPK) kepada pihak berelasi dan pihak ketiga sesuai dengan peraturan yang ditetapkan Otoritas Jasa Keuangan.

Kredit dan pembiayaan/piutang syariah yang direstrukturisasi berdasarkan kolektibilitas dan sektor ekonomi:

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

b. Classification Based on OJK Collectibility (continued)

7) Loans and Sharia Financing/Receivables (continued)

Other significant information (continued)

As of December 31, 2024, 2023 and 2022, there is neither any breach nor violation of Legal Lending Limit (LLL) to related parties and third parties as required by Regulation of Financial Services Authority.

Restructured loans and sharia financing/receivables by collectibility and economic sector:

	31 Desember/*December 31, 2024*						
	Lancar/ *Current*	**Dalam perhatian khusus/ *Special mention***	**Kurang lancar/ *Substandard***	**Diragukan/ *Doutbful***	**Macet/ *Loss***	**Total**	
Perumahan	18.051.594	20.524.730	470.260	1.254.079	4.391.996	44.692.659	*Property*
Konstruksi	2.256.373	1.389.119	5.796	15.962	1.009.420	4.676.670	*Construction*
Jasa usaha	1.579.420	794.705	175	5.156	89.365	2.468.821	*Business service*
Perdagangan, restoran dan hotel	168.286	656	38.334	-	12.418	219.694	*Trading, restaurant and hotel*
Jasa-jasa sosial	106.104	5.279	-	-	9.416	120.799	*Social services*
Manufaktur	-	816	-	-	-	816	*Manufacturing*
Transportasi. pergudangan dan komunikasi	2.992.876	126.982	-	-	-	3.119.858	*Transportation. warehousing and communication*
Pertambangan	-	-	-	-	3.078	3.078	*Mining*
Lain-lain*)	9.617	792	-	33	198	10.640	*Other*)
Total	**25.164.270**	**22.843.079**	**514.565**	**1.275.230**	**5.515.891**	**55.313.035**	***Total***

	31 Desember/*December 31, 2023*						
	Lancar/ *Current*	**Dalam perhatian khusus/ *Special mention***	**Kurang lancar/ *Substandard***	**Diragukan/ *Doutbful***	**Macet/ *Loss***	**Total**	
Perumahan	27.028.674	13.252.016	344.212	302.541	5.309.171	46.236.614	*Property*
Konstruksi	1.980.812	2.270.627	13.096	7.194	453.035	4.724.764	*Construction*
Jasa usaha	1.657.252	7.818	14.476	176	96.484	1.776.206	*Business service*
Perdagangan, restoran dan hotel	247.741	8.126	-	10.597	22.289	288.753	*Trading, restaurant and hotel*
Jasa-jasa sosial	101.841	21.709	-	-	10.091	133.641	*Social services*
Manufaktur	52	813	-	-	574	1.439	*Manufacturing*
Transportasi, pergudangan dan komunikasi	2.996.673	126.911	-	-	855	3.124.439	*Transportation, warehousing and communication*
Pertambangan	-	-	-	-	12.270	12.270	*Mining*
Lain-lain*)	13.596	1.410	-	-	254	15.260	*Other*)
Total	**34.026.641**	**15.689.430**	**371.784**	**320.508**	**5.905.023**	**56.313.386**	***Total***

*) Terdiri dari rumah tangga dan sektor ekonomi lainnya

**) Consists of household and other economic sectors*

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

b. Klasifikasi Berdasarkan Kolektibilitas OJK (lanjutan)

7) Kredit yang Diberikan dan Pembiayaan/ Piutang Syariah (lanjutan)

Informasi pokok lainnya (lanjutan)

Kredit dan pembiayaan/piutang syariah yang direstrukturisasi berdasarkan kolektibilitas dan sektor ekonomi: (lanjutan)

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

b. Classification Based on OJK Collectibility (continued)

7) Loans and Sharia Financing/ Receivables (continued)

Other significant information (continued)

Restructured loans and sharia financing/receivables by collectibility and economic sector: (continued)

	31 Desember/*December 31, 2022*						
	Lancar/ *Current*	**Dalam perhatian khusus/ *Special mention***	**Kurang lancar/ *Substandard***	**Diragukan/ *Doutbful***	**Macet/ *Loss***	**Total**	
Perumahan	30.595.294	11.093.003	441.112	646.733	4.635.418	47.411.560	*Property*
Konstruksi	4.013.346	481.513	15.628	32.339	976.286	5.519.112	*Construction*
Jasa usaha	1.234.625	21.170	10.542	10.623	137.547	1.414.507	*Business service*
Perdagangan, restoran dan hotel	215.923	103.350	-	16	97.199	416.488	*Trading, restaurant and hotel*
Jasa-jasa sosial	105.371	25.335	302	-	17.854	148.862	*Social services*
Manufaktur	1.257	776	-	-	359	2.392	*Manufacturing*
Transportasi, pergudangan dan komunikasi	2.998.715	6.634	-	-	1.413	3.006.762	*Transportation, warehousing and communication*
Pertambangan	-	-	-	-	12.266	12.266	*Mining*
Pertanian	-	-	-	4	-	4	*Farming*
Lain-lain*)	15.199	1.432	397	134	12.413	29.575	*Other*)
Total	**39.179.730**	**11.733.213**	**467.981**	**689.849**	**5.890.755**	**57.961.528**	***Total***

Skema restrukturisasi yang disepakati oleh Bank dan debitur meliputi antara lain penjadwalan ulang pembayaran pokok kredit dan bunga, pembebasan tunggakan bunga, penurunan suku bunga, penambahan fasilitas kredit, novasi dan lain-lain.

Restructured loans scheme agreed by the Bank and its debtors include loans principal and interest rescheduling, overdue interest exemption, reduction of interest rates, additional loan facilities, novation and others.

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

b. Klasifikasi Berdasarkan Kolektibilitas OJK (lanjutan)

7) Kredit yang Diberikan dan Pembiayaan/ Piutang Syariah (lanjutan)

Kredit dan pembiayaan/piutang syariah yang direstrukturisasi berdasarkan kolektibilitas dan sektor ekonomi: (lanjutan)

Bank telah melakukan restrukturisasi kredit untuk debitur yang terdampak pandemi Covid-19 sesuai dengan POJK No. 11/POJK.03/2020 "Stimulus Perekonomian Nasional sebagai kebijakan countercyclical dampak penyebaran Corona Virus Disease 2019 tertanggal 13 Maret 2020 dan perubahan POJK No. 48/POJK.03/2020 "Perubahan atas Peraturan Otoritas Jasa Keuangan Nomor 11/POJK.03/2020 tentang Stimulus Perekonomian Nasional sebagai kebijakan countercyclical dampak penyebaran Corona Virus Disease 2019" tertanggal 1 Desember 2020 dan perubahan kedua POJK No. 17/POJK.03/2021 "Perubahan kedua atas Peraturan Otoritas Jasa Keuangan Nomor 11/POJK.03/2020 tentang Stimulus Perekonomian Nasional sebagai kebijakan countercyclical dampak penyebaran Corona Virus Disease 2019" tertanggal 10 September 2021.

Per tanggal 31 Desember 2024, 2023 dan 2022 total saldo kredit restrukturisasi Covid-19 masing-masing sebesar Rp19.027.569, Rp25.663.629 dan Rp33.667.902.

Dalam laporan Bank ke Otoritas Jasa Keuangan (OJK) disebutkan bahwa pada tanggal 31 Desember 2024, 2023 dan 2022, Bank telah mematuhi ketentuan Batas Maksimum Pemberian Kredit (BMPK), baik terhadap pihak-pihak berelasi maupun kepada pihak yang tidak berelasi.

Rasio kredit usaha kecil (KUK) terhadap total kredit adalah sebesar 0,99%, 0,80% dan 0,44% masing-masing pada tanggal 31 Desember 2024, 2023 dan 2022.

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

b. Classification Based on OJK Collectibility (continued)

7) Loans and Sharia Financing/Receivables (continued)

Restructured loans and sharia financing/receivables by collectibility and economic sector: (continued)

Bank has restructured its credit for debtors affected by Covid-19 pandemic in accordance with POJK No.11/POJK.03/2020 "National Economic stimulus as countercyclical policy in the impact of the spread of Coronavirus Disease 2019" dated March 13, 2020 and amendment POJK No.48/POJK.03/2020 "Amendment of POJK No.11/POJK.03/2020 Regarding National Economic stimulus as countercyclical policy in the impact of the spread of Coronavirus Disease 2019" dated December 1, 2020 and second amendment POJK No.17/POJK.03/2021 "Second Amendment of POJK No.11/POJK.03/2020 Regarding National Economic stimulus as countercyclical policy in the impact of the spread of Coronavirus Disease 2019" dated September 10, 2021.

As of December 31, 2024, 2023 and 2022 the total balance of Covid-19 restructure loans amounted to Rp19,027,569, Rp25,663,629 and Rp33,667,902, respectively.

Based on the report submitted by the Bank to Financial Services Authority (OJK) as of December 31, 2024, 2023 and 2022, the Bank is in compliance with the legal lending limit (BMPK) regulations, both for the related and non-related party borrowers.

The ratio of small-scale enterprise loans to total loans is 0.99%, 0.80% and 0.44% as of December 31, 2024, 2023 and 2022, respectively.

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

b. Klasifikasi Berdasarkan Kolektibilitas OJK (lanjutan)

7) Kredit yang Diberikan dan Pembiayaan/ Piutang Syariah (lanjutan)

Jumlah minimum cadangan kerugian penurunan nilai kredit yang diberikan dan pembiayaan/piutang syariah, yang wajib dibentuk sesuai dengan ketentuan Otoritas Jasa Keuangan adalah sebesar Rp12.209.531, Rp12.641.044 dan Rp11.909.808, masing-masing pada tanggal 31 Desember 2024, 2023 dan 2022.

8) Komitmen dan Kontinjensi

Kolektibilitas garansi yang diterbitkan dan fasilitas kredit yang belum ditarik yang mempunyai risiko kredit adalah sebagai berikut:

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

b. Classification Based on OJK Collectibility (continued)

7) Loans and Sharia Financing/Receivables (continued)

Minimum allowance for impairment losses for loans and sharia financing receivables required by Financial Services Authority amounted to Rp12,209,531, Rp12,641,044 and Rp11,909,808 as of December 31, 2024, 2023 and 2022, respectively.

8). Commitments and Contingencies

The collectibility classification of guarantees issued and unused loan facility bearing credit risks are as follows:

	31 Desember/ *December 31,* 2024		31 Desember/ *December 31,* 2023		31 Desember/ *December 31,* 2022		
	Jumlah nosional mata uang asing *Notional amount in foreign currencies (angka penuh/ full amount)*	Ekuivalen/ *Equivalent Rupiah*	Jumlah nosional mata uang asing/ *Notional amount in foreign currencies (angka penuh/ full amount)*	Ekuivalen/ *Equivalent Rupiah*	Jumlah nosional mata uang asing/ *Notional amount in foreign currencies (angka penuh/ full amount)*	Ekuivalen/ *Equivalent Rupiah*	
Lancar							*Current*
Rupiah							*Rupiah*
Garansi yang diterbitkan (Catatan 40)		2.579.383		2.112.148		887.321	*Guarantees issued (Note 40)*
Fasilitas kredit yang belum ditarik (*committed*)		86.184		127.083		67.928	*Unused loan facility (committed)*
Irrevocable L/C yang masih berjalan (Catatan 40)		249.694		20.106		221.484	*Outstanding irrevocable L/Cs (Note 40)*
		2.915.261		2.259.337		1.176.733	
Mata uang asing							*Foreign currencies*
Garansi yang diterbitkan (Catatan 40)							*Guarantees issued (Note 40)*
Dolar Amerika Serikat	18.315.405	294.786	30.269.447	466.059	3.869.076	60.232	*United States Dollar*
Euro Eropa	14.908.241	249.834	56.784	968	56.784	942	*European Euro*
		544.620		467.027		61.174	
		3.459.881		**2.726.364**		**1.237.907**	
Dalam Perhatian Khusus							*Special mention*
Rupiah							*Rupiah*
Fasilitas kredit yang belum ditarik (*committed*)		-		-		12.200	*Unused loan facility (committed)*
Total		**3.459.881**		**2.726.364**		**1.250.107**	***Total***

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

c. Aset dan liabilitas moneter dalam mata uang asing

Posisi Devisa Neto

Perhitungan Posisi Devisa Neto (PDN) didasarkan pada Peraturan Bank Indonesia No. 5/13/PBI/2003 tanggal 17 Juli 2003 sebagaimana telah diubah dengan perubahan keempat Peraturan Bank Indonesia No. 17/5/PBI/2015 tanggal 29 Mei 2015. Berdasarkan peraturan tersebut, Bank diwajibkan untuk menjaga rasio PDN laporan posisi keuangan dan secara keseluruhan maksimum 20% dari jumlah modal. PDN adalah penjumlahan nilai absolut yang dinyatakan dalam Rupiah dari selisih bersih antara aset dan liabilitas dalam mata uang asing dan selisih bersih dari tagihan dan liabilitas komitmen dan kontinjensi yang dicatat dalam rekening administratif yang didenominasi dalam setiap mata uang asing.

PDN Bank pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022:

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

c. *Assets and liabilities denominated in foreign currencies*

Net Open Position

The Net Open Position (NOP) is calculated based on Bank Indonesia Regulation No. 5/13/PBI/2003 dated July 17, 2003 which was fourth amended by Bank Indonesia Regulation No. 17/5/PBI/2015 dated May 29, 2015. Based on this regulation, the Bank is required to maintain Net Open Position ratio of the overall statement of financial position at a maximum of 20% of the total capital. The NOP is the sum of the absolute values, which are stated in Rupiah, of the net difference between the assets and liabilities denominated in each foreign currency and the net difference of the receivables and payables of both commitments and contingencies recorded in the administrative accounts denominated in each foreign currency.

The Bank's NOP as of December 31, 2024, 2023 and 2022 are as follows:

	31 Desember/*December 31,* 2024			
	Aset/*Assets*	**Liabilitas/*Liabilities***	**Posisi Devisa Neto/ *Net Open Position***	
Laporan posisi keuangan dan Rekening administratif				*Statement of financial position and Administrative accounts*
Dolar Australia	1.916.596	(1.949.093)	32.497	*Australian Dollar*
Dolar Amerika Serikat	50.252.606	(50.177.699)	74.907	*United States Dollar*
Yen Jepang	738.224	(749.325)	11.101	*Japanese Yen*
Pound Sterling Inggris	198.004	(9.533)	188.471	*Great Britain Pound Sterling*
Euro Eropa	326.050	(429.071)	103.021	*European Euro*
Dolar Singapura	1.060.649	(1.058.974)	1.675	*Singapore Dollar*
Renminbi	4.075	(367)	3.708	*Renminbi*
Dolar Hong Kong	68.519	(68.415)	104	*Hong Kong Dollar*
Ringgit Malaysia	1.440	(1.136)	304	*Malaysian Ringgit*
Riyal Arab Saudi	922	(326)	596	*Saudi Arabian Riyal*
Dolar Canada	29.028	(29.028)	-	*Canada Dollar*
			416.384	
Modal (Catatan 51d)			**32.273.030**	***Capital (Note 51d)***
Rasio PDN			**1,29%**	***NOP ratio***

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

c. Aset dan liabilitas moneter dalam mata uang asing (lanjutan)

Posisi Devisa Neto (lanjutan)

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

c. *Assets and liabilities denominated in foreign currencies (continued)*

Net Open Position (continued)

	31 Desember/*December 31,* 2023			
	Aset/*Assets*	**Liabilitas/*Liabilities***	**Posisi Devisa Neto/ *Net Open Position***	
Laporan posisi keuangan dan Rekening administratif				*Statement of financial position and Administrative accounts*
Dolar Australia	177.633	(20.421)	157.212	*Australian Dollar*
Dolar Amerika Serikat	30.741.381	(30.627.376)	114.005	*United States Dollar*
Yen Jepang	850.554	(759.435)	91.119	*Japanese Yen*
Pound Sterling Inggris	86.071	-	86.071	*Great Britain Pound Sterling*
Euro Eropa	81.632	(1.337)	80.295	*European Euro*
Dolar Singapura	39.205	(47.435)	8.230	*Singapore Dollar*
Renminbi	3.497	(19)	3.478	*Renminbi*
Dolar Hong Kong	371s	-	371	
Hong Kong Dollar				
Ringgit Malaysia	303	-	303	*Malaysian Ringgit*
Riyal Arab Saudi	140	-	140	*Saudi Arabian Riyal*
			541.224	
Modal (Catatan 51d)			**31.230.282**	***Capital (Note 51d)***
Rasio PDN			**1,73%**	***NOP ratio***

	31 Desember/*December 31,* 2022			
	Aset/*Assets*	**Liabilitas/*Liabilities***	**Posisi Devisa Neto/ *Net Open Position***	
Laporan posisi keuangan dan Rekening administratif				*Statement of financial position and Administrative accounts*
Dolar Amerika Serikat	7.622.973	(8.311.493)	688.520	*United States Dollar*
Yen Jepang	480.099	(808.933)	328.834	*Japanese Yen*
Dolar Singapura	36.865	(24.018)	12.847	*Singapore Dollar*
Dolar Australia	48.406	(4)	48.402	*Australian Dollar*
Renminbi	1.089	(8)	1.081	*Renminbi*
Ringgit Malaysia	292	(10)	282	*Malaysian Ringgit*
Euro Eropa	31.464	(328)	31.136	*European Euro*
Pound Sterling Inggris	63.405	(11)	63.394	*Great Britain Pound Sterling*
Dolar Hong Kong	97	-	97	*Hong Kong Dollar*
Riyal Arab Saudi	81	-	81	*Saudi Arabian Riyal*
			1.174.674	
Modal (Catatan 51d)			**28.168.457**	***Capital (Note 51d)***
Rasio PDN			**4,17%**	***NOP ratio***

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

d. Rasio Kewajiban Penyediaan Modal Minimum (KPMM)

Bank secara aktif mengelola modalnya sesuai dengan peraturan yang berlaku. Tujuan utamanya adalah untuk memastikan bahwa setiap saat Bank dapat menjaga kecukupan modalnya untuk menutup risiko bawaan *(inherent risks)* pada kegiatan perbankan tanpa mengurangi optimalisasi nilai pemegang saham.

KPMM pada tanggal 31 Desember 2024, 2023 dan 2022 dihitung berdasarkan Peraturan Otoritas Jasa Keuangan (POJK) No. 27/POJK.03/2022, POJK No.34/POJK.03/2016 dan POJK No. 11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum Bank Umum.

Berdasarkan POJK No. 27/POJK.03/2022 tentang Perubahan Kedua atas POJK No.11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum Bank Umum, PBI No. 17/22/PBI/2015 tentang Kewajiban Pembentukan Countercyclical Buffer dan POJK No. 46/POJK.03/2015 tentang Penetapan Systemically Important Bank dan Capital Surcharge, Bank diwajibkan membentuk tambahan modal sebagai penyangga (buffer) yang berlaku secara bertahap mulai 1 Januari 2016. Pembentukan modal buffer yaitu Capital Conservation Buffer, Countercyclical Buffer dan Capital Surcharge untuk D-SIB yang wajib dibentuk berdasarkan persentase tertentu dari Aset Tertimbang Menurut Risiko (ATMR) masing-masing sebesar 2,50%, 0,00% dan 1,00%.

Berdasarkan POJK No 48/POJK.03/2020 tanggal 1 Desember 2020 tentang Perubahan atas POJK No.11/POJK.03/2020 tanggal 27 Mei 2020, untuk kebijakan relaksasi dalam rangka mendukung program pemulihan ekonomi nasional sektor perbankan, bahwa kewajiban pemenuhan Capital Conservation Buffer dalam komponen modal ditiadakan sampai dengan 31 Maret 2022.

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

d. Minimum Required Capital Adequacy (CAR)

The Bank actively manages its capital in accordance with the regulatory requirements. The primary objective of which is to ensure that the Bank, at all times, maintains adequate capital to cover inherent risks to its banking activities without prejudice to optimizing shareholder's value.

CAR on December 31, 2024, 2023 and 2022 was calculated based on Otoritas Jasa Keuangan (OJK) No. 27/POJK.03/2022, POJK No. 34/POJK.03/2016 and POJK No. 11/POJK.03/2016 concerning the Minimum Capital Requirement for Commercial Banks.

Based on POJK No. 27/POJK.03/2022 concerning of Second Change Regulation No. 11/POJK.03/2016 concerning the Minimum Capital Requirement for Commercial Banks, PBI No. 17/22/PBI/2015 concerning the Establishment of Countercyclical Buffer Requirement, and POJK No. 46/POJK.03/2015 concerning the Determination of Systemically Important Bank and Capital Surcharge, the Bank is required to form additional capital as a buffer that apply in stages starting on January 1, 2016. The establishment of buffer capital consists of Capital Conservation Buffer, Countercyclical Buffer, and Capital Surcharge for D-SIB which shall be established based on a percentage of Risk Weighted Assets (RWA) of 2.50%, 0.00% and 1.00%, respectively.

Based on POJK No. 48/POJK.03/2020 as of December 1, 2020 concerning the amendments of POJK No.11/POJK.03/2020 dated May 27, 2020 for relaxation policy in order to support the national economic recovery program of the banking sector, that the obligation to fulfill the Capital Conservation Buffer in the capital component is removed until March 31, 2022.

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

d. Rasio Kewajiban Penyediaan Modal Minimum (KPMM) (lanjutan)

Berdasarkan profil risiko Bank masing-masing per 31 Desember 2024, 2023 dan 2022, yaitu low to moderate, maka rasio kecukupan modal (KPMM) minimum per 31 Desember 2024, 2023 dan 2022 ditetapkan masing-masing sebesar 9% sampai dengan 9%.

Penentuan kepatuhan Bank terhadap peraturan dan rasio yang berlaku didasarkan pada peraturan praktik akuntansi yang berbeda dalam beberapa hal dengan Standar Akuntansi Keuangan di Indonesia.

Pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022, Bank telah memenuhi rasio sesuai yang disyaratkan Bank Indonesia dan/atau Otoritas Jasa Keuangan untuk KPMM.

Perhitungan KPMM Bank pada tanggal 31 Desember 2024, 2023 dan 2022 adalah sebagai berikut:

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

d. Minimum Required Capital Adequacy (CAR) (continued)

Based on the risk profile as of December 31, 2024, 2023 and 2022, respectively, which are both low to moderate, the minimum CAR for December 31, 2024, 2023 and 2022, is set at 9% to less than 9%, respectively.

The determination of the Bank's compliance with regulations and applicable ratios are based on the accounting rules which is differ in several aspects with the Financial Accounting Standards in Indonesia.

As of December 31, 2024, 2023 and 2022, the Bank has fulfilled the required ratios of Bank Indonesia and/or Financial Services Authority for the CAR.

The computation of the Bank's CAR as of December 31, 2024, 2023 and 2022 follows:

		31 Desember/ ***December 31,* 2024**	**31 Desember/** ***December 31,* 2023**	**31 Desember/** ***December 31,* 2022**	
Modal inti	a	29.834.471	27.154.078	22.533.407	*Core Capital*
Modal pelengkap (Maksimal 100% dari modal inti)	b	2.438.559	4.076.204	5.635.050	*Supplementary Capital (Maximum of 100% of Core Capital)*
Modal pelengkap tambahan yang dialokasikan untuk mengantisipasi risiko pasar	c	-	-	-	*Additional supplementary capital allocated for anticipation of market risk*
Jumlah Modal Inti dan Modal Pelengkap	d=a+b	**32.273.030**	**31.230.282**	**28.168.457**	***Total Core Capital and Supplementary Capital***
Jumlah modal inti, modal pelengkap dan modal pelengkap tambahan yang dialokasikan untuk mengantisipasi risiko pasar	e=c+d	32.273.030	31.230.282	28.168.457	*Total core capital, supplementary capital and additional supplementary capital allocated for anticipation of market risk*
Penyertaan	f	-	-	-	*Investment*
Jumlah modal untuk risiko kredit	g=d-f	32.273.030	31.230.282	28.168.457	*Total capital for credit risk*
Jumlah modal untuk risiko kredit dan risiko pasar	h=e-f	32.273.030	31.230.282	28.168.457	*Total capital for credit risk and market risk*
Aset tertimbang menurut risiko kredit	i	149.287.750	136.691.761	114.318.357	*Risk weighted assets credit risk*
ATMR untuk risiko pasar	j	6.101.634	942.326	1.373.299	*RWA for market risk*
ATMR untuk risiko operasional	k	19.055.594	17.956.060	23.938.858	*RWA for operational risk*

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

d. Rasio Kewajiban Penyediaan Modal Minimum (KPMM) (lanjutan)

Perhitungan KPMM Bank pada tanggal 31 Desember 2024, 2023 dan 2022 adalah sebagai berikut: (lanjutan)

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

d. Minimum Required Capital Adequacy (CAR) (continued)

The computation of the Bank's CAR as of December 31, 2024, 2023 and 2022 follows: (continued)

		31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
Jumlah ATMR untuk risiko kredit dan risiko operasional	l=i+k	168.343.344	154.647.821	138.257.215	*Total RWA for credit risk and operational risk*
Jumlah ATMR untuk risiko kredit, risiko operasional dan risiko pasar	m=i+j+k	174.444.978	155.590.147	139.630.514	*Total RWA for Credit Risk, Operational Risk and market risk*

Penentuan kepatuhan Bank terhadap peraturan dan rasio yang berlaku didasarkan pada peraturan praktik akuntansi yang berbeda dalam beberapa hal dengan Standar Akuntansi Keuangan di Indonesia.

The determination of the Bank's compliance with regulations and applicable ratios are based on the accounting rules which is differ in several aspects with the Financial Accounting Standards in Indonesia.

Pada tanggal-tanggal 31 Desember 2024, 2023 dan 2022, Bank telah memenuhi rasio sesuai yang disyaratkan Bank Indonesia dan/atau Otoritas Jasa Keuangan untuk KPMM.

As of December 31, 2024, 2023 and 2022, the Bank has fulfilled the required ratios of Bank Indonesia and/or Financial Services Authority for the CAR.

Perhitungan KPMM Bank pada tanggal 31 Desember 2024, 2023 dan 2022 adalah sebagai berikut:

The computation of the Bank's CAR as of December 31, 2024, 2023 and 2022 follows:

		31 Desember/ *December 31,* 2024	31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022	
CAR untuk risiko kredit dan risiko operasional	n=g/l	19,17%	20,19%	20,37%	*CAR for credit risk and operational risk*
CAR untuk risiko kredit risiko operasional, dan risiko pasar	o=h/m	18,50%	20,07%	20,17%	*CAR for credit risk Operational risk and market risk*
CAR Minimum yang Diwajibkan		9%	9%	9%	*Minimum CAR*

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

e. Manajemen Risiko

Dasar Penerapan Manajemen Risiko

Dalam penerapan manajemen risiko, BTN senantiasa patuh dan taat terhadap regulasi dan perundang-undangan yang berlaku di Indonesia dengan mengacu pada:

1. Peraturan Otoritas Jasa Keuangan (Peraturan OJK) No.4/POJK.03/2016 tanggal 26 Januari 2016 tentang Penilaian Tingkat Kesehatan Bank Umum.
2. Peraturan OJK No. 18/POJK.03/2016 tanggal 16 Maret 2016 tentang Penerapan Manajemen Risiko Bagi Bank Umum
3. Peraturan OJK No. 55/POJK.03/2016 tanggal 9 Desember 2016 tentang Penerapan Tata Kelola Bagi Bank Umum.
4. Peraturan OJK No. 19 Tahun 2024 tanggal 8 November 2024 tentang Kewajiban Pemenuhan Rasio Kecukupan Likuiditas (*Liquidity Coverage Ratio*) Bagi Bank Umum.
5. Peraturan OJK No. 20 Tahun 2024 tanggal 8 November 2024 tentang Kewajiban Pemenuhan Rasio Pendanaan Stabil Bersih (*Net Stable Funding Ratio*) Bagi Bank Umum.
6. Peraturan OJK No. 5 Tahun 2024 tanggal 27 Maret 2024 tentang Penetapan Status Pengawasan dan Penanganan Permasalahan Bank Umum.
7. Peraturan OJK No. 51/POJK.03/2017 tanggal 18 Juli 2017 tentang Penerapan Keuangan Berkelanjutan Bagi Lembaga Jasa Keuangan, Emiten dan Perusahaan Publik.
8. Peraturan OJK No. 21 Tahun 2023 tanggal 22 Desember 2023 tentang Layanan Digital Oleh Bank Umum.
9. Peraturan OJK No. 32/POJK.03/2018 tanggal 27 Desember 2018 tentang Batas Maksimum Pemberian Kredit Dan Penyediaan Dana Besar Bagi Bank Umum.

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

e. Risk Management

Basis for Risk Management Implementation

In the implementation of risk management, BTN consistently adheres to and complies with the regulations and laws applicable in Indonesia by referring to:

1. *OJK Regulation No. 4/POJK.03/2016, dated January 26, 2016, concerning the Assessment of the Health Level of Commercial Banks.*
2. *OJK Regulation No. 18/POJK.03/2016, dated March 16, 2016, concerning the Implementation of Risk Management for Commercial Banks.*
3. *OJK Regulation No. 55/POJK.03/2016, dated December 9, 2016, concerning the Implementation of Governance for Commercial Banks.*
4. *OJK Regulation No. 19 of 2024 dated November 8, 2024 concerning the Obligation to Fulfill the Liquidity Coverage Ratio for Commercial Banks.*
5. *OJK Regulation No. 20 of 2024 dated November 8, 2024 concerning the Obligation to Fulfill the Net Stable Funding Ratio for Commercial Banks.*
6. *OJK Regulation No. 5 Year 2024 dated March 27, 2024 regarding the Determination of Supervisory Status and Handling of Commercial Bank Problems.*
7. *OJK Regulation No. 51/POJK.03/2017, dated July 18, 2017, concerning the Implementation of Sustainable Finance for Financial Service Institutions, Issuers, and Public Companies.*
8. *OJK Regulation No. 21 of 2023 dated December 22, 2023 regarding Digital Services by Commercial Banks.*
9. *OJK Regulation No. 32/POJK.03/2018, dated December 27, 2018, concerning the Maximum Limit on Credit Provision and Large Funding for Commercial Banks.*

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

e. Manajemen Risiko (lanjutan)

Dasar Penerapan Manajemen Risiko (lanjutan)

Dalam penerapan manajemen risiko, BTN senantiasa patuh dan taat terhadap regulasi dan perundang-undangan yang berlaku di Indonesia dengan mengacu pada: (lanjutan)

10. Peraturan OJK No. 11/ POJK.03/2019 tanggal 28 Maret 2019 tentang Prinsip Kehati-hatian Dalam Aktivitas Sekuritisasi Aset Bagi Bank Umum.
11. Peraturan OJK No. 31/POJK.03/2019 tanggal 2 Desember 2019 tentang Kewajiban Pemenuhan Rasio Pengungkit Bagi Bank Umum.
12. Peraturan OJK No. 37/POJK.03/2019 tanggal 19 Desember 2019 tentang Transparansi Dan Publikasi Laporan Bank.
13. Peraturan Bank Indonesia No. 23/17/PBI/2021 tanggal 17 Desember 2021 tentang Perubahan Ketiga atas Peraturan Bank Indonesia No.20/4/PBI/2018 Tentang Rasio Intermediasi Makroprudensial dan Penyangga Likuiditas Makroprudensial Bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah.
14. Surat Edaran OJK No.14/SEOJK.03/2015 tanggal 25 Mei 2015 tentang Penerapan Manajemen Risiko Terintegrasi Bagi Konglomerasi Keuangan.
15. Surat Edaran OJK No.15/SEOJK.03/2015 tanggal 25 Mei 2015 tentang Penerapan Tata Kelola Terintegrasi bagi Konglomerasi Keuangan.
16. Surat Edaran OJK No.34/SEOJK.03/2016 tanggal 1 September 2016 tentang Penerapan Manajemen Risiko Bagi Bank Umum.
17. Surat Edaran OJK No.13/SEOJK.03/2017 tanggal 17 Maret 2017 tentang Penerapan Tata Kelola Bagi Bank Umum.

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

e. Risk Management (continued)

Basis for Risk Management Implementation (continued)

In the implementation of risk management, BTN consistently adheres to and complies with the regulations and laws applicable in Indonesia by referring to: (continued)

10. OJK Regulation No. 11/POJK.03/2019, dated March 28, 2019, concerning the Principles of Prudence in Asset Securitization Activities for Commercial Banks.
11. OJK Regulation No. 31/POJK.03/2019, dated December 2, 2019, concerning the Obligation to Fulfill the Leverage Ratio for Commercial Banks.
12. OJK Regulation No. 37/POJK.03/2019, dated December 19, 2019, concerning Transparency and Publication of Bank Reports.
13. Bank Indonesia Regulation No. 23/17/PBI/2021, dated December 17, 2021, concerning the Third Amendment to Bank Indonesia Regulation No. 20/4/PBI/2018 on Macroprudential Intermediation Ratio and Macroprudential Liquidity Buffer for Conventional Banks, Sharia Banks, and Sharia Business Units.
14. OJK Circular Letter No. 14/SEOJK.03/2015, dated May 25, 2015, concerning the Implementation of Integrated Risk Management for Financial Conglomerates.
15. OJK Circular Letter No. 15/SEOJK.03/2015, dated May 25, 2015, concerning the Implementation of Integrated Governance for Financial Conglomerates.
16. OJK Circular Letter No. 34/SEOJK.03/2016, dated September 1, 2016, concerning the Implementation of Risk Management for Commercial Banks.
17. OJK Circular Letter No. 13/SEOJK.03/2017, dated March 17, 2017, concerning the Implementation of Governance for Commercial Banks.

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

e. Manajemen Risiko (lanjutan)

Dasar Penerapan Manajemen Risiko (lanjutan)

Dalam penerapan manajemen risiko, BTN senantiasa patuh dan taat terhadap regulasi dan perundang-undangan yang berlaku di Indonesia dengan mengacu pada: (lanjutan)

18. Surat Edaran OJK No.14/SEOJK.03/2017 tanggal 17 Maret 2017 tentang Penilaian Tingkat Kesehatan Bank Umum.
19. Surat Edaran OJK No. 6/SEOJK.03/2020 tanggal 29 April 2020 tentang Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Operasional dengan Menggunakan Pendekatan Standar Bagi Bank Umum.
20. Surat Edaran OJK No.16/SEOJK.04/2021 tanggal 29 Juni 2021 tentang Bentuk dan Isi Laporan Tahunan Emiten Atau Perusahaan Publik
21. Undang Undang No.4 Tahun 2023 tentang Pengembangan dan Penguatan Sektor Jasa Keuangan (UU P2SK)
22. Peraturan Lembaga Penjamin Simpanan No. 2 Tahun 2024 tanggal 13 Agustus 2024 tentang Rencana Resolusi Bagi Bank Umum.
23. Peraturan OJK No. 22 Tahun 2023 perihal Perubahan Kedua Peraturan OJK No. 11/POJK.03/2016 tanggal 2 Februari 2016 tentang Kewajiban Penyediaan Modal Minimum Bank Umum.
24. SEOJK No 24/SEOJK.03/2021 tanggal 7 Oktober 2021 tentang Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Kredit dengan menggunakan Pendekatan Standar Bagi Bank Umum
25. SEOJK No. 23/SEOJK.03/2022 tanggal 7 Desember 2022 tentang Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Pasar Bagi Bank Umum

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

e. Risk Management (continued)

Basis for Risk Management Implementation (continued)

In the implementation of risk management, BTN consistently adheres to and complies with the regulations and laws applicable in Indonesia by referring to: (continued)

18. *OJK Circular Letter No. 14/SEOJK.03/2017, dated March 17, 2017, concerning the Assessment of the Health Level of Commercial Banks.*
19. *OJK Circular Letter No. 6/SEOJK.03/2020, dated April 29, 2020, concerning the Calculation of Risk-Weighted Assets for Operational Risk Using the Standard Approach for Commercial Banks.*
20. *OJK Circular Letter No.16/SEOJK.04/2021 dated June 29, 2021 regarding the Form and Content of the Annual Report of Issuers or Public Companies.*
21. *Law No.4 of 2023 on the Development and Strengthening of the Financial Services Sector (UU P2SK)*
22. *Lembaga Penjamin Simpanan Regulation No. 2 Year 2024 dated August 13, 2024 regarding Resolution Plan for Commercial Banks.*
23. *OJK Regulation No. 22 of 2023 concerning the Second Amendment to OJK Regulation No. 11/POJK.03/2016 dated February 2, 2016, concerning the Minimum Capital Requirement for Commercial Banks.*
24. *OJK Circular Letter No. 24/SEOJK.03/2021, dated October 7, 2021, concerning the Calculation of Risk-Weighted Assets for Credit Risk Using the Standard Approach for Commercial Banks.*
25. *OJK Circular Letter No. 23/SEOJK.03/2022, dated December 7, 2022, concerning the Calculation of Risk-Weighted Assets for Market Risk for Commercial Banks.*

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

e. Manajemen Risiko (lanjutan)

Dasar Penerapan Manajemen Risiko (lanjutan)

Dalam penerapan manajemen risiko, BTN senantiasa patuh dan taat terhadap regulasi dan perundang-undangan yang berlaku di Indonesia dengan mengacu pada: (lanjutan)

26. Peraturan Menteri Badan Usaha Milik Negara Nomor PER-2/MBU/03/2023 Tahun 2023 tanggal 24 Maret 2023 tentang Pedoman Tata Kelola dan Kegiatan Korporasi Signifikan Badan Usaha Milik Negara.

Bank melakukan manajemen risiko yang meliputi seluruh jenis risiko yang wajib dilakukan dan ditanamkan secara mendarah daging oleh seluruh jenjang organisasi melalui penerapan Budaya Risiko. Selain itu, BTN juga menerapkan pemantauan, tindak lanjut, serta penilaian indeks maturitas manajemen risiko secara terintegrasi menyeluruh di setiap level organisasi BTN yang menjadi bagian tidak terpisahkan dari manajemen Risiko BTN.

Dalam mengantisipasi tantangan ekonomi domestik maupun global yang akan dihadapi BTN mengingat portofolio aset Bank yang didominasi oleh Kredit Pemilikan Rumah (KPR) maka dibutuhkan suatu sistem pengelolaan risiko dan permodalan yang efektif dan terintegrasi, yang mampu mendukung pencapaian dan pertumbuhan kinerja secara berkelanjutan sekaligus meningkatkan daya saing Bank.

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

e. Risk Management (continued)

Basis for Risk Management Implementation (continued)

In the implementation of risk management, BTN consistently adheres to and complies with the regulations and laws applicable in Indonesia by referring to: (continued)

26. Minister of State-Owned Enterprises Regulation No. PER-2/MBU/03/2023, dated March 24, 2023, concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises.

Bank conducts risk management, which encompasses all types of risks that must be undertaken and ingrained at all levels of the organisation through the implementation of a risk culture. In addition, BTN also implements monitoring, follow-up, and comprehensive integrated assessment of the risk management maturity index at every level of the BTN organisation, making it an integral part of BTN's risk management.

In anticipating domestic and global economic challenges that Bank will face, considering BTN's asset portfolio is dominated by home ownership loans (KPR), an effective and integrated risk management and capital management system is required. This system should support sustainable performance achievement and growth while simultaneously enhancing the bank's competitiveness.

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

e. Manajemen Risiko (lanjutan)

Upaya meminimalkan dampak negatif tersebut dilakukan dengan pengelolaan risiko secara day to day risk management activities, dengan berlandaskan prinsip *Good Corporate Governance* (GCG) untuk memastikan seluruh proses dan mekanisme yang terjadi dalam mencapai tujuan perusahaan, mencegah perusahaan dari penyimpangan dan risiko yang dapat mengakibatkan kegagalan pencapaian tujuan perusahaan, serta berlandaskan prinsip kehati-hatian untuk memastikan pertumbuhan kinerja Bank yang sehat dan berkesinambungan.

Bank menerapkan pengelolaan risiko guna menjalankan praktik tata kelola perusahaan yang baik dan bertujuan untuk meminimalkan potensi kerugian, tetapi juga sebagai strategi proaktif untuk mencapai tujuan organisasi dengan lebih efektif dan efisien. Praktik pengelolaan risiko BTN berpedoman pada Peraturan Bank Indonesia (PBI), Peraturan Otoritas Jasa Keuangan (POJK), Basel dan standar best practices. Kebijakan pengelolaan manajemen risiko ditinjau secara rutin agar terkini sesuai dengan perubahan kondisi bisnis, regulasi maupun kondisi internal Bank.

Dalam rangka mengukur tingkat kualitas rancangan dan efektivitas penerapan manajemen risiko dalam melindungi dan menciptakan nilai, Bank telah melakukan penilaian Tingkat kematangan risiko *(Risk Maturity Index*/RMI) berbasis kinerja tahun buku 2023. Penilaian ini menggabungkan penilaian berdasarkan dimensi (budaya dan kapabilitas risiko; organisasi dan tata kelola; kerangka risiko dan kepatuhan; proses dan kontrol risiko, model, data dan teknologi risiko) dengan realisasi kinerja yang terdiri dari Tingkat Kesehatan Peringkat Akhir *(Final Rating)* dan Peringkat Komposit Risiko. Selanjutnya atas rekomendasi dan prioritisasi penilaian RMI tersebut disusun peta jalan *(roadmap)* perbaikan manajemen risiko tahun 2024 -2029.

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

e. Risk Management (continued)

Efforts to minimise the negative impact are carried out through day-to-day risk management activities based on the principles of good corporate governance (GCG) to ensure that all processes and mechanisms occurring to achieve the company's goals prevent the company from deviations and risks that can lead to failure in achieving the company's objectives, and based on the principle of prudence to ensure the bank's healthy and sustainable performance growth.

Bank implements risk management to practice good corporate governance and aims to minimise potential losses, as well as as a proactive strategy to achieve organisational goals more effectively and efficiently. BTN's risk management practices are guided by Bank Indonesia Regulations (PBI), Financial Services Authority Regulations (POJK), Basel, and best practice standards. Risk management policies are regularly reviewed to remain current with changes in business conditions, regulations, and the bank's internal conditions.

In order to measure the level of design quality and effectiveness of risk management implementation in protecting and creating value, the Bank has conducted a performance-based Risk Maturity Index (RMI) assessment for the financial year 2023. This assessment combines assessment based on dimensions (risk culture and capability; organization and governance; risk and compliance framework; risk process and control, risk model, data and technology) with performance realization consisting of Final Rating Health Level and Risk Composite Rating. Furthermore, based on the recommendations and prioritization of the RMI assessment, a roadmap for risk management improvement for 2024-2029 was prepared.

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

e. Manajemen Risiko (lanjutan)

Manajemen Risiko dilaksanakan secara Individu dan konsolidasi/terintegrasi (apabila BTN telah memiliki Perusahaan Anak) dengan tetap memperhatikan regulasi dan karakteristik bisnis BTN. Pelaksanaan penerapan Manajemen Risiko Terintegrasi BTN diatur dalam ketentuan tersendiri sesuai ketentuan Regulator yang berlaku. Kebijakan Umum Manajemen Risiko dijadikan sebagai pedoman utama dalam melaksanakan pengelolaan Risiko secara operasional dan pengelolaan modal BTN, yang mencakup:

1. Prinsip kehati-hatian pada setiap aspek proses dan aktivitas bisnis BTN, antara lain: Management Portfolio, Kebijakan Perkreditan/Pembiayaan, Penyediaan Kecukupan Modal, *Early Warning System* untuk kredit UMKM dan *Wholesale*, Penetapan Limit, dan Diversifikasi Risiko.
2. Manajemen Risiko, antara lain: Risk Appetite, Risk Tolerance, Risk Profile, Stress Testing, dan Manajemen Risiko Terintegrasi (apabila BTN telah memiliki Perusahaan Anak). Dalam penerapan Manajemen Risiko, BTN menerapkan 4 (empat) pilar Manajemen Risiko secara efektif sesuai dengan ketentuan Regulator yakni:
   a. Pengawasan aktif Direksi dan Dewan Komisaris;
   b. Kecukupan kebijakan dan prosedur manajemen risiko serta penerapan limit risiko;
   c. Kecukupan proses identifikasi, pengukuran, pemantauan dan pengendalian Risiko serta Sistem Informasi Manajemen Risiko; dan
   d. Sistem pengendalian risiko yang menyeluruh.
3. Manajemen Risiko untuk masing-masing jenis Risiko, yang meliputi: proses identifikasi, pengukuran, pemantauan, dan pengendalian Risiko.
4. Pengawasan Risiko, yang meliputi: pemantauan penerapan aktivitas/metodologi pengelolaan Risiko Bank dan Sistem Pengendalian Internal.

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

e. Risk Management (continued)

Risk Management is implemented both individually and in a consolidated/integrated manner (if BTN has subsidiaries), while still considering regulations and BTN's business characteristics. The implementation of BTN's Integrated Risk Management is governed by separate provisions in accordance with the applicable regulatory requirements. The General Risk Management Policy serves as the primary guideline for operational risk management and capital management at BTN, which includes:

1. *Principles of prudence in every aspect of BTN's business processes and activities, including: Management Portfolio, Credit/Financing Policies, Capital Adequacy, Early Warning System for SME and Wholesale credit, Limit Setting, and Risk Diversification.*
2. *Risk Management, including: Risk Appetite, Risk Tolerance, Risk Profile, Stress Testing, and Integrated Risk Management (if BTN has subsidiaries). In implementing Risk Management, BTN applies the 4 (four) pillars of Risk Management effectively in accordance with regulatory requirements, namely:*
   a. Active oversight by the Board of Directors and Board of Commissioners;
   b. Adequacy of risk management policies and procedures and implementation of risk limits;
   c. Adequacy of risk identification, measurement, monitoring, and control processes, as well as Risk Management Information Systems; and
   d. Comprehensive risk control systems.
3. *Risk Management for each type of risk, which includes: processes for identifying, measuring, monitoring, and controlling risk*
4. *Risk Oversight, which includes: monitoring the implementation of risk management activities/methodologies and Internal Control Systems.*

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

e. Manajemen Risiko (lanjutan)

Manajemen Risiko dilaksanakan secara Individu dan konsolidasi/terintegrasi (apabila BTN telah memiliki Perusahaan Anak) dengan tetap memperhatikan regulasi dan karakteristik bisnis BTN. Pelaksanaan penerapan Manajemen Risiko Terintegrasi BTN diatur dalam ketentuan tersendiri sesuai ketentuan Regulator yang berlaku. Kebijakan Umum Manajemen Risiko dijadikan sebagai pedoman utama dalam melaksanakan pengelolaan risiko secara operasional dan pengelolaan modal BTN, yang mencakup: (lanjutan)

5. Dalam penerapan Manajemen Risiko, Bank menetapkan klasifikasi risiko BUMN berdasarkan tingkat Intensitas Risiko dengan mempertimbangkan dimensi ukuran dan kompleksitas BTN sesuai dengan ketentuan Regulator yang berlaku pada industri perbankan.
6. *Climate Risk Management & Analysis* dalam rangka manajemen risiko iklim pada industri perbankan, khususnya terkait dampaknya terhadap risiko kredit, pasar, likuiditas, dan operasional Bank.
7. *Climate Risk Management & Scenario Analysis* dalam rangka manajemen risiko iklim pada industri perbankan, khususnya terkait dampaknya terhadap risiko kredit, pasar, likuiditas, dan operasional Bank.

Dalam menjalankan penerapan manajemen risiko yang sehat diperlukan kecukupan kebijakan dan prosedur manajemen risiko yang baik. Pemetaan kebijakan umum manajemen risiko digambarkan mulai dari strategi manajemen risiko, pengelolaan risiko pada Bank dan output yang diharapkan adalah Tingkat Kesehatan Bank yang sehat.

BTN telah mengembangkan strategi manajemen risiko yang sejalan dengan tujuan bisnisnya, dengan menerapkan *Risk Appetite Framework* untuk menetapkan batas risiko yang dapat diterima sesuai dengan *risk capacity Bank.*

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

e. Risk Management (continued)

Risk Management is implemented both individually and in a consolidated/integrated manner (if BTN has subsidiaries), while still considering regulations and BTN's business characteristics. The implementation of BTN's Integrated Risk Management is governed by separate provisions in accordance with the applicable regulatory requirements. The General Risk Management Policy serves as the primary guideline for operational risk management and capital management at BTN, which includes: (continued)

5. In implementing Risk Management, the Bank classifies BUMN risks based on the level of Risk Intensity, considering the size and complexity dimensions of BTN in accordance with the applicable regulatory requirements in the banking industry.

6. Climate Risk Management & Analysis for managing climate risk in the banking industry, particularly concerning its impact on credit, market, liquidity, and operational risks of the Bank.
7. Climate Risk Management & Scenario Analysis for managing climate risk in the banking industry, particularly concerning its impact on credit, market, liquidity, and operational risks of the Bank.

To implement sound risk management, adequate risk management policies and procedures are essential. The mapping of general risk management policies is outlined in the risk management strategy, risk management within the bank, and the expected output, which is a healthy bank health level.

BTN has developed a risk management strategy that aligns with its business objectives by implementing a Risk Appetite Framework to establish acceptable risk limits in accordance with the Bank's risk capacity.

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

e. Manajemen Risiko (lanjutan)

BTN telah memiliki *Risk Appetite Statement* (RAS) yang merupakan pernyataan kualitatif serta ukuran kuantitatif dari risiko-risiko utama Bank. Pengungkapan RAS dilakukan secara tertulis dan didokumentasikan dengan baik oleh Satuan Kerja Manajemen Risiko. Penetapan Limit RAS dilakukan oleh Dewan Komisaris dan Direksi. Dalam penetapan RAS, telah memperhatikan keberlanjutan ekonomi, keberlanjutan lingkungan dan keberlanjutan sosial yang kemudian diselaraskan pada penyusunan Rencana Kerja Anggaran Perusahaan, *Risk Appetite, Risk Tolerance* dan *Recovery Plan.*

Guna melengkapi pengukuran risiko khususnya risiko pasar dan risiko likuiditas, Bank melakukan *stress test* dengan *worst case scenario*. Selain melakukan scenario analysis terhadap aktivitas bank secara keseluruhan, Bank juga melakukan scenario analysis terhadap aktivitas tertentu, khususnya aktivitas baru, yang berpotensi meningkatkan eksposur risiko suku bunga. *Stress Test* yang dilakukan oleh Bank fokus pada 3 (tiga) jenis risiko yaitu risiko kredit, risiko pasar dan risiko likuiditas. Untuk menyempurnakan pengukuran risiko khususnya risiko pasar, risiko likuiditas dan risiko kredit, Bank melakukan *stress test* terhadap *worst case scenario* sebagaimana diatur dalam PT.8-A.6 Pelaksanaan *Stress Test* perihal Petunjuk Pelaksanaan *Stress Testing* dengan frekuensi minimal 1 (satu) tahun sekali untuk risiko kredit dan risiko pasar serta per triwulan untuk risiko likuiditas.

Bank melakukan *stress test*ing secara berkala untuk menilai kecukupan modal dalam hal terjadinya kejadian-kejadian risiko yang bersifat ekstrim atau *catastrophe*. *Stress Testing* Risiko Likuiditas telah dilakukan sebanyak 2 kali yaitu disampaikan melalui laporan Profil Risiko Triwulan I/2024 dan Triwulan II/2024. Stress Testing Risiko Kredit dan Risiko Pasar dilakukan sedikitnya sekali dalam satu tahun dan dilakukan sebanyak 1 kali dimana pelaporan tahun 2024 akan disampaikan kepada OJK.

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

e. Risk Management (continued)

BTN has a Risk Appetite Statement (RAS) which provides both qualitative and quantitative measures of the Bank's key risks. The RAS is disclosed in writing and thoroughly documented by the Risk Management Unit. The limits for the RAS are established by the Board of Commissioners and the Board of Directors. When setting the RAS, considerations include economic sustainability, environmental sustainability, and social sustainability, which are then integrated into the development of the Company's Budget Work Plan, Risk Appetite, Risk Tolerance, and Recovery Plan.

In measuring risks, particularly market risk and liquidity risk, the Bank conducts stress testing using worst case scenario in addition to scenario analysis of the Bank's activities as a whole. The Bank also performs scenario analysis on specific activities, especially new activity, which could potentially increase the interest rate risk exposure. Currently, the stress tests conducted by the Bank is focused on 3 (three) types of risks, namely, credit risk, market risk (including interest rate risk) and liquidity risk.To improve the measurement of market risk, liquidity risk and credit risk, the Bank conduct stress test on worst case scenario as regulated in PT.8-A.6 Implementation for Stress Testing regarding The Guidelines of Implementation for Stress Testing with a minimum frequency of 1 (one) year for credit risk and market risk and quarterly for liquidity risk.

The Bank conducts periodic stress testing to assess capital adequacy in anticipation of the occurrence of risk events that are extreme or catastrophic. Stress Testing for liquidity risk has been carried out 2 times, which is submitted through the Risk Profile report for Quarter I/2024 and Quarter II/2024. Market Risk and Credit Risk Stress Testing is conducted at least once a year and conducted once in 2024 and the report will be submitted to the OJK.

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

e. Manajemen Risiko (lanjutan)

Dalam melakukan proses penerapan Manajemen Risiko yang efektif, Bank melengkapi sistem pengendalian internal yang bertujuan untuk menjaga aset Bank, menjamin tersedianya pelaporan keuangan dan manajerial yang dapat dipercaya, meningkatkan kepatuhan terhadap ketentuan dan peraturan perundang-undangan, serta mengurangi risiko terjadinya kerugian, penyimpangan dan pelanggaran aspek kehati-hatian. Terselenggaranya sistem pengendalian internal yang handal dan efektif menjadi tanggung jawab dari seluruh satuan kerja operasional dan satuan kerja pendukung serta Satuan Kerja Audit Internal.

Dalam penguatan kebijakan dan prosedur manajemen risiko, dalam pelaksanaannya BTN juga memasukkan manajemen risiko sebagai salah satu pilar budaya perusahaan BTN, dimana salah satu pilar budaya perusahaan adalah *Governance & Risk Culture*. Pilar *Governance & Risk Culture* merupakan pilar yang krusial untuk diperkuat sehingga seluruh proses bisnis berjalan dengan *prudent dan comply.*

Dalam rangka meningkatkan dan mengoptimalkan pelayanan kepada masyarakat khususnya dalam bisnis *Commercial dan Corporate Loan* serta meningkatkan pendapatan Bank dapat melalui pemberian fasilitas *Credit Line* kepada Non Lembaga Keuangan. Dalam proses pemberian Fasilitas *Credit Line* kepada Non Lembaga Keuangan sudah melibatkan unit manajemen risiko kredit mulai dari pengumpulan data hingga proses keputusan pemberian Fasilitas *Credit Line* kepada Non Lembaga Keuangan. Hasil penetapan limit fasilitas *Credit Line* kepada *Counterparty* didasarkan atas analisa aspek legal, rating perusahaan, aspek manajemen, aspek keuangan, aspek industri, aspek pemasaran, dan aspek agunan. Manajemen Risiko Pasar juga melakukan pengawasan transaksi terhadap limit fasilitas *Credit Line* kepada Non Lembaga Keuangan secara harian.

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

e. Risk Management (continued)

In carrying out an effective Risk Management process, the Bank supports its internal control system to protect the Bank's assets, ensure reliable financial and managerial reporting, enhance compliance with laws and regulations, and minimize the risk of losses, deviations, and breaches of prudence. The establishment of a reliable and effective internal control system is the responsibility of all operational units, supporting units, and the Internal Audit Unit.

In strengthening risk management policies and procedures, BTN also incorporates risk management as one of the pillars of BTN's corporate culture. One of these cultural pillars is Governance & Risk Culture. The Governance & Risk Culture pillar is crucial to reinforce, ensuring that all business processes are conducted prudently and in compliance.

In order to improve and optimize services to the public, especially in the Commercial and Corporate Loan business, as well as to increase Bank revenue through the provision of Credit Line facilities to Non-Financial Institutions. In the process of granting Credit Line Facilities for Non-Financial Institutions, the credit risk management unit has been involved, starting from data collection to the decision process for granting Credit Line Facilities for Non-Financial Institutions. The results of the limit determination of Credit Line facilities to Counterparties are based on analysis of legal aspects, company ratings, management aspects, financial aspects, industrial aspects, marketing aspects, and collateral aspects. Market Risk Management also monitors transactions on Credit Line facility limits for Non-Financial Institutions on a daily basis.

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

e. Manajemen Risiko (lanjutan)

Struktur Manajemen Risiko

Tata kelola risiko Bank yang berlandaskan prinsip GCG terwujud dari terlibatnya seluruh organ Bank dalam pengelolaan manajemen risiko. Hal ini dapat dilihat dari susunan organisasi manajemen risiko Bank. Dewan Komisaris dan Direksi bertanggung jawab untuk memastikan penerapan Manajemen Risiko telah memadai sesuai dengan karakteristik, kompleksitas dan profil risiko Bank. Dewan Komisaris dan Direksi berperan aktif pada proses manajemen risiko dalam rangka memitigasi risiko Bank melalui Kualitas Penerapan Manajemen Risiko yang meliputi tata kelola risiko, kerangka manajemen risiko, proses manajemen risiko, kecukupan sumber daya manusia, dan kecukupan sistem informasi manajemen risiko, serta kecukupan sistem pengendalian risiko.

Komite Pemantau Risiko

Komite Pemantau Risiko bertugas dan bertanggung jawab dalam memberikan rekomendasi kepada Dewan Komisaris dengan melakukan evaluasi atas pedoman kebijakan manajemen risiko Bank (Risiko Kredit, Risiko Pasar, Risiko Likuiditas, Risiko Operasional, Risiko Hukum, Risiko Stratejik, Risiko Kepatuhan dan Risiko Reputasi), melakukan evaluasi kesesuaian antara pedoman kebijakan manajemen risiko dengan pelaksanaannya dan melakukan pemantauan serta mengevaluasi pelaksanaan tugas Komite Manajemen Risiko dan Satuan Kerja Manajemen Risiko. Dalam melaksanakan tugas dan tanggung jawabnya, Komite Pemantau Risiko mengadakan rapat dengan *Enterprise & ESG Risk Management Division* serta *Digital Operations Risk Division* secara berkala membahas isu-isu terkini, Profil Risiko Triwulanan, Tingkat Kesehatan Bank, *Recovery Plan* dan hal-hal yang terkait dengan manajemen risiko Bank termasuk ikut me*review* Pedoman Kebijakan Manajemen Risiko yang didalamnya terdapat *Risk Appetite* dan *Risk Tolerance Bank.*

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

e. Risk Management (continued)

Risk Management Structure

The Bank's risk governance, which is based on the principles of GCG, involves the entire Bank in managing risks. This can be seen in the composition of the Bank's risk management organizational structure. The Board of Commissioners (BOC) and Board of Directors (BOD) are responsible for ensuring the proper implementation of risk management in accordance to the characteristics, complexity and risk profile of the Bank. The BOC and BOD play an active role in the risk management process in order to mitigate the risk of the Bank through Quality of Risk Management Implementation which covers risk governance, risk management framework, risk management process, the adequacy of human resources and risk management information systems, as well as the adequacy of risk management systems.

Risk Monitoring Committee

The Risk Monitoring Committee is responsible for providing recommendations to the Board of Commissioners by evaluating the Bank's risk management policy guidelines (Credit Risk, Market Risk, Liquidity Risk, Operational Risk, Strategic Risk, Compliance Risk and Reputational Risk), evaluating according to the policy guidelines and monitoring the duties of Risk Management Comittee. In carrying out its duties, the Risk Monitoring Committee with the Enterprise Risk Management Division regularly discuss issues about Risk Profile, Bank Soundness Level, Recovery Plan and other matters related to Bank risk management including reviewing the Risk Management Policy Guidelines in which there are Risk Appetite and Risk Tolerance Bank.

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

e. Manajemen Risiko (lanjutan)

Struktur Manajemen Risiko (lanjutan)

Komite Manajemen Risiko

Komite Manajemen Risiko (KMR) berperan aktif dalam memberikan pertimbangan-pertimbangan terhadap risiko yang melekat pada kebijakan yang akan ditetapkan Direksi maupun memberikan evaluasi terhadap ketentuan-ketentuan yang dinilai kurang sesuai dengan perkembangan terkini dan perlu dilakukan penyesuaian. KMR terlibat secara aktif dalam melakukan penilaian risiko yang melekat pada setiap produk dan/atau jasa/aktivitas baru sehingga Bank dapat melakukan langkah-langkah mitigasi yang diperlukan. Selain itu apabila dipandang perlu, KMR dapat melakukan evaluasi terhadap Pedoman Kebijakan Manajemen Risiko (PKMR).

Komite ESG

Komite ESG berperan dalam memetakan dan menyusun kebijakan/strategi Program ESG dan TJSL serta melakukan monitoring dan evaluasi pelaksanaan Program ESG dan TJSL. Komite ESG menetapkan langkah-langkah perbaikan mengenai hal-hal yang berkaitan dengan Program ESG dan TJSL mencakupi *Community Development*, Pendanaan Usaha Mikro dan Kecil (PUMK), Rencana Aksi Keuangan Keberlanjutan, serta kegiatan bisnis dalam rangka tanggung jawab Bank kepada masyarakat atas risiko bisnis yang ditimbulkan oleh Bank dan melaporkannya kepada Direksi. Selain itu, Komite ESG juga memantau penerapan *monitoring* atas implementasi Strategi dan *Roadmap* ESG Bank.

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

e. Risk Management (continued)

Risk Management Structure (continued)

Risk Management Committee

The Bank's Risk Management Committee (RMC) is actively involved in providing advice on the inherent risks associated to new policies to be established by the BOD and providing evaluation to the regulations that are considered to be outdated and require updating. The RMC is also actively involved in conducting risk measurement of the risks associated to new products and/or services to enable the Bank to take the necessary mitigating actions. The RMC may evaluate the Risk Management Policy Guidelines, if necessary.

ESG Committee

The ESG Committee plays a role in mapping and formulating policies/strategies for the ESG and SJSL Program as well as monitoring and evaluating the implementation of the ESG and SJSL Program. The ESG Committee determines corrective measures on matters relating to the ESG and CSR Programs including Community Development, Funding for Micro and Small Enterprises (PUMK), Sustainability Finance Action Plan, as well as business activities in the context of the Bank's responsibility to the community for business risks incurred by the Bank and reports them to the Board of Directors. In addition, the ESG Committee also monitors the implementation of the Bank's ESG Strategy and Roadmap.

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

e. Manajemen Risiko (lanjutan)

Struktur Manajemen Risiko (lanjutan)

Satuan Kerja Manajemen Risiko

Enterprise & ESG Risk Management Division (ERMD) merupakan Satuan Kerja Manajemen Risiko (SKMR) pada Bank, dipimpin oleh seorang Kepala Divisi yang bertanggung jawab langsung kepada Direktur *Risk Management*. Struktur organisasi *Enterprise & ESG Risk Management Division* terdiri dari *Market Risk Management Department, Credit Portofolio Risk Management Department, Integrated Risk Management Department, Environmental, Social, & Governance (ESG) Department dan Model Validation*.

Satuan Kerja Manajemen Risiko Operasional & Digital

Digital & Operations Risk Management Division (DORD) merupakan Satuan Kerja Manajemen Risiko (SKMR) pada Bank, dipimpin oleh seorang Kepala Divisi yang bertanggung jawab langsung kepada *Direktur Risk Management.* Struktur organisasi *Digital & Operations Risk Management Division* terdiri dari *Fraud Risk Management Department, Digital Risk Management Department, Operational Risk Management Department, Regional Operational Risk Control Department,* dan *Operational Risk Control (ORC) Departement* yang terdiri dari 4 Bidang Direktorat yaitu *ORC Retail Banking, ORC Wholesale Banking, ORC Risk & Assets Management,* dan *ORC Operation & Human Capital.*

Bank telah memiliki panduan kebijakan di bidang manajemen risiko yaitu Pedoman Kebijakan Manajemen Risiko (PKMR) di mana di dalamnya telah mencakup ketentuan-ketentuan minimal yang disyaratkan di dalam Peraturan Bank Indonesia. Pengkajian ulang terhadap kebijakan internal juga dilakukan agar sesuai dengan ketentuan terkini dari regulator dengan melakukan gap analysis serta mengakomodasi best practices yang lazim digunakan untuk meningkatkan kualitas penerapan manajemen risiko.

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

e. Risk Management (continued)

Risk Management Structure (continued)

Risk Management Division

Enterprise & ESG Risk Management Division (ERMD) is a Risk Management Working Unit (RMWU) at the Bank, led by a Division Head that is responsible directly to the Enterprise Risk Management, Big Data & Analytics Director. The organizational structure of the ERMD consists of the Market Risk Management Department, Credit Portofolio Risk Management Department, Integrated Risk Management Department, Environmental, Social, & Governance (ESG) Department and Model Validation.

Digital & Operations Risk Management Division

Digital & Operations Risk Management Division (DORD) is a Risk Management Work Unit (SKMR) at the Bank, led by a Division Head who is directly responsible to the Director of Risk Management. The organizational structure of the Digital & Operational Risk Management Division consists of the Fraud Risk Management Department, Digital Risk Management Department, Operational Risk Management Department, Regional Operational Risk Control Department, and Operational Risk Control Department (ORC) which consists of 4 Directorate Fields, namely ORC Retail Banking, ORC Wholesale Banking, ORC Risk & Assets Management, and ORC Operation & Human Capital.

The Bank's risk management policies are formalized in the RMPM. RMPM sets out the minimum requirements based on Bank Indonesia regulations. A regular review is conducted on internal policies to comply with the prevailing regulations from regulatory bodies. Gap analysis are performed and best practices are applied to enhance the quality of the risk management implementation.

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

e. Manajemen Risiko (lanjutan)

Struktur Manajemen Risiko (lanjutan)

Kebijakan dan Prosedur Pengelolaan Manajemen Risiko

Sistem informasi manajemen risiko pada tahap awal difokuskan pada pengumpulan dan perbaikan database risiko yang diharapkan dapat dikembangkan dan diaplikasikan ke dalam sistem teknologi informasi secara bertahap agar proses pengukuran risiko dan pemantauan risiko dapat dilakukan secara terintegrasi dan dapat disajikan secara tepat waktu.

Profil Risiko

Sesuai dengan POJK No. 18/POJK.03/2016 tanggal 16 Maret 2016 dan SE OJK No. 34/SEOJK.03/2016 tanggal 1 September 2016 tentang Penerapan Manajemen Risiko Bagi Bank Umum, ERMD menyampaikan laporan profil risiko kepada Otoritas Jasa Keuangan per triwulan yang memuat tentang eksposur risiko kredit, risiko pasar, risiko likuiditas, risiko operasional, risiko kepatuhan, risiko hukum, risiko reputasi dan risiko stratejik. Selanjutnya berdasarkan POJK No. 4/POJK.03/2016 tanggal 26 Januari 2016 dan SEOJK No.14/SEOJK.03/2017 tanggal 17 Maret 2017 tentang Penilaian Tingkat Kesehatan Bank Umum, meliputi penilaian faktor profil risiko yang meliputi penilaian terhadap risiko inheren dan kualitas penerapan manajemen

Secara umum, sesuai dengan penilaian secara *self assessment* Profil Risiko Bank triwulan IV tahun 2024 diupayakan tetap berada pada tingkat *Low to Moderate* yang tercermin dari tingkat risiko inherent moderate dan tingkat kualitas penerapan manajemen risiko dengan peringkat *satisfactory.* Risiko Inheren meliputi strategi bisnis, karakteristik bisnis, kompleksitas produk dan aktivitas Bank, industri dimana Bank melakukan kegiatan usaha, serta kondisi makro ekonomi. Kualitas Penerapan Manajemen Risiko meliputi tata kelola risiko, kerangka manajemen risiko, proses manajemen risiko, kecukupan sumber daya manusia, dan kecukupan sistem informasi manajemen risiko, serta kecukupan sistem pengendalian risiko.

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

e. Risk Management (continued)

Risk Management Structure (continued)

Risk Management Policies and Procedures

The Bank also performs risk management on information systems which focuses on risk database collection and improvement. The data is gradually developed and applied in the information technology system so that risk measurement and monitoring can be integrated into the Bank's risk management on a timely basis

Risk Profile

In accordance with POJK No.18/POJK.03/2016 dated March 16, 2016 and SE OJK No. 34/SEOJK.03/2016 dated September 1, 2016 regarding on Risk Management for Commercial Banks, ERMD submits on a quarterly basis a risk profile report to the Financial Services Authority, which contains exposure to credit risk, market risk, liquidity risk, operational risk, compliance risk, legal risk, reputational risk and strategic risk. Furthermore, based on POJK No. 4/POJK.03/2016 dated January 26, 2016 and SEOJK No. 14/SEOJK.03/2017 dated March 17, 2017 regarding a Bank's health level, the assessment of the risk profile will cover the inherent risk and quality of risk management implementation through the operational activities of the Bank.

In general, in accordance with the self-assessment of the Bank's Risk Profile for the fourth quarter of 2024, it is strived to be at the Low to Moderate level, which is reflected in the moderate inherent risk level and satisfactory level of quality of risk management implementation. Inherent risks include business strategy, business characteristics, complexity of products and activities of the Bank, the industry in which the Bank conducts business, as well as macroeconomic conditions. The quality of risk management implementation covers risk governance, risk management framework, risk management process, the adequacy of human resources and risk management information systems, as well as the adequacy of the risk management system.implementation through the operational activities of the Bank.

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

e. Manajemen Risiko (lanjutan)

Risiko Operasional

Risiko Operasional yang timbul harus segera diantisipasi. Pencadangan modal yang dilakukan Bank dihitung berdasarkan kebutuhan modal minimum (CAR) merupakan salah satu langkah antisipasi agar eksposur Risiko Operasional tidak sampai mengganggu permodalan.

Dalam rangka menghitung kebutuhan modal minimum (CAR) untuk risiko operasional, Bank menerapkan Pendekatan Standar *(Standardized Approach),* sesuai Surat Edaran Otoritas Jasa Keuangan Nomor 6/SEOJK.03/2020 tanggal 29 April 2020 tentang Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Operasional dengan Menggunakan Pendekatan Standar Bagi Bank Umum.

Dalam penerapan manajemen risiko operasional, *Digital and Operations Risk Management Division* (DORD) berfungsi memastikan proses identifikasi, pengukuran, pemantauan dan pengendalian risiko berjalan dengan efektif pada setiap aktivitas fungsional, produk atau layanan baru.

Dalam rangka melakukan proses identifikasi risiko, saat ini Bank sedang mengembangkan aplikasi *Operational Risk Management Information System* (ORMIS). Aplikasi ORMIS ini terdiri dari tiga modul utama yang terintegrasi yaitu LED, RCSA, dan KRI.

Modul LED (*Loss Event* Database) dirancang terhubung dengan Kantor Wilayah dan Kantor Cabang. Dengan demikian Kantor Wilayah dan Kantor Cabang dapat secara periodik mengirimkan data *loss event* masing-masing kantor secara online melalui ORMIS.

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

e. Risk Management (continued)

Operational Risk

Operational risk arising should be anticipated. Provision of capital held by bank is calculated based on minimum Capital Adequacy Ratio (CAR) which is one of anticipatory measures in order the operational risk exposure not interfere Bank's capital structure.

In order to calculate the minimum Capital Adequacy Ratio (CAR) for operational risk, the Bank applies the Standardized Approach, in accordance with Financial Services Autority Circular Letter No. 6/SEOJK.03/2020 dated April 29, 2020 regarding the calculation of Risk Weighted Assets (RWA) for Operational Risk Calculated using Standardized Approach (SA).

In implementing operational risk management, the Digital and Operations Risk Management Division (DORD) functions to ensure that the process of identifying, measuring, monitoring and controlling risks runs effectively in every functional activity, new product or service.

In order to make the process of identifying risks, the Bank is currently developing applications Operations Risk Management Information System (ORMIS). The ORMIS application consists of three main integrated modules, namely LED, RCSA, and KRI.

The LED (Loss Event Database) module is designed to be connected to Regional Offices and Branch Offices. In this way, Regional Offices and Branch Offices can periodically send loss event data for each office online via ORMIS.

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

e. Manajemen Risiko (lanjutan)

Risiko Operasional (lanjutan)

Data yang terkumpul selanjutnya akan diolah dan dianalisis. Dari hasil pengolahan dan analisis tersebut diharapkan akan teridentifikasi peta eksposur risiko yang diperoleh, selanjutnya akan dilakukan langkah mitigasi terhadap eksposur risiko yang teridentifikasi tersebut.

Modul RCSA (*Risk and Control Self-Assessment*) digunakan dalam proses identifikasi dan pengukuran risiko operasional yang melekat pada seluruh aktivitas unit kerja Bank. Oleh karena itu dalam mengisi RCSA seluruh unit kerja dituntut untuk dapat mengidentifikasi dan mengukur risiko-risiko operasional yang melekat pada aktivitas sehari-hari dan berdampak pencapaian sasaran unit kerja termasuk menetapkan jenis kontrol dalam rangka memastikan seluruh potensi risiko pada masing-masing unit kerja dapat dikendalikan.

Sedangkan modul KRI merupakan perangkat untuk memantau tren risiko berdasarkan indikator risiko yang ditetapkan. Atas indikator risiko tersebut akam menjadi dasar untuk penyusunan langkah antisipasi maupun perbaikan di masa yang akan datang.

Pengendalian dan mitigasi risiko operasional dilaksanakan oleh seluruh satuan kerja Bank. *Digital and Operations Risk Management Division* bertugas untuk memastikan bahwa Bank telah memiliki kebijakan dan prosedur pengendalian dan mitigasi risiko operasional yang memadai yang wajib dipatuhi dan dilaksanakan oleh setiap satuan kerja dalam melaksanakan transaksi dan aktivitas dengan akurat, efisien dan tepat waktu.

Dalam pengendalian risiko operasional, pelaksanaan kaji ulang manajemen risiko operasional dilakukan oleh *Internal Audit Division* (IAD) yang mencakup keandalan kerangka manajemen risiko operasional dan penerapan manajemen risiko operasional oleh unit bisnis/aktivitas pendukung.

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

e. Risk Management (continued)

Operational Risk (continued)

The Data collected will be processed and analyzed. Processing and analysis of the results are expected to be identified as a risk exposure maps are obtained, further mitigation measures will be performed against the identified risk exposures.

The RCSA (Risk and Control Self-Assessment) module is used in the process of identifying and measuring operational risks inherent in all Bank work unit activities. Therefore, in completing the RCSA, all work units are required to be able to identify and measure operational risks that are inherent in daily activities and have an impact on achieving work unit targets, including determining the type of control in order to ensure that all potential risks in each work unit can be controlled

Meanwhile, the KRI module is a tool for monitoring risk trends based on established risk indicators. These risk indicators will become the basis for preparing anticipatory and corrective steps in the future.

Controlling and mitigating operational risk is conducted by risk taking units within the Bank. The Digital and Operations Risk Management Division ensures that the Bank has adequate policies and procedures, which must be complied and carried out by each risk taking unit in conducting its daily transactions and activities accurately, efficiently and in a timely manner.

In operational risk control, the implementation of operational risk management reviews is carried out by the Internal Audit Division (IAD) which includes the reliability of the operational risk management framework and the implementation of operational risk management by business units/supporting activities.

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

e. Manajemen Risiko (lanjutan)

Risiko Hukum

Pengukuran risiko hukum dilaksanakan oleh *Enterprise Risk Management Division* bersama-sama *Legal Division* berdasarkan laporan hasil evaluasi atas analisis kasus-kasus hukum secara individual terhadap liabilitas kontinjensi yang timbul dari tuntutan hukum yang terjadi.

Pemantauan risiko hukum dilaksanakan oleh *Legal Division* untuk mengevaluasi efektivitas dari implementasi kebijakan, prosedur dan kepatuhan terhadap kebijakan, regulasi hukum serta batas ketentuan Bank. Pemantauan dilaksanakan secara berkala terhadap seluruh posisi risiko hukum.

Dalam melaksanakan pengendalian risiko hukum, *Legal Division* memberi masukan hukum dan rekomendasi kepada setiap divisi dan satuan kerja serta melakukan *review* secara berkala terhadap perjanjian dan kontrak kerjasama dengan *counterparty.*

Risiko Reputasi

Identifikasi risiko reputasi dilakukan pada faktor-faktor risiko yang melekat pada aktivitas fungsional yang mencakup keterbukaan *(disclosure requirement)*, keluhan nasabah terhadap pelayanan Bank, perilaku karyawan Bank dalam melayani nasabah dan sistem komunikasi Bank.

Pengukuran risiko reputasi dilakukan berdasarkan hasil assesment terhadap faktor-faktor risiko reputasi. Risiko reputasi Bank dikelola oleh *Corporate Secretary Division* (CSD) dan *Customer Experience Division* (CXD) serta dilaporkan ke OJK oleh ERMD dalam laporan profil risiko.

Dalam rangka pemantauan risiko reputasi, dikembangkan aplikasi Sistem Pengaduan Nasabah (SPN) untuk mendukung layanan dan penanganan pengaduan nasabah yang memungkinkan proses penanganan pengaduan secara online antar pihak-pihak yang terkait dengan permasalahan di Kantor Cabang dan Kantor Pusat. Hal ini berguna untuk memastikan terjaganya kepuasan nasabah.

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

e. Risk Management (continued)

Legal Risk

Legal risk measurement is conducted together by Enterprise Risk Management Division and Legal Division based on the evaluation report resulting from the analysis of individual legal cases on contingent liabilities arising from legal litigation.

Legal risk monitoring is conducted by Legal Division to evaluate the effectiveness of policies, procedures and compliance with the Bank's policies and prevailing laws and regulations. Periodic monitoring is conducted on all legal risk exposures.

To mitigate legal risk, Legal Division provides legal advice and recommendation to each division and risk taking units and also conducts a regular review of agreements and partnership contracts with counterparty.

Reputational Risk

Reputational risk is identified an inherent risk factors associated to functional activities including disclosure requirements, customer complaints against the Bank, employee attitude when providing services to customers and the Bank's communication systems.

Reputation risk measurement is based on the results of assessment on the reputation risk factors. Bank reputation risk is managed by Corporate Secretary Division (CSD) and Costumer Experience Division and reported to OJK by ERMD in the risk profile report.

In order to monitor reputational risk, the Bank developed an application called Customer Complaint System (CCS) to support customer service and complaint handling that allows online complaints handling process between the parties related to the issues at branch offices and head office. This will be useful to ensure sustained customer satisfaction.

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

e. Manajemen Risiko (lanjutan)

Risiko Reputasi (lanjutan)

Dalam pengendalian risiko reputasi, satuan kerja yang berfungsi sebagai corporate secretary bertanggung jawab dalam penerapan kebijakan yang berkaitan dengan penanganan dan penyelesaian berita negatif atau menghindari informasi kontra produktif serta untuk menjalankan fungsi *Public Service Obligation* (PSO) dalam rangka melaksanakan tanggung jawab sosial perusahaan *(corporate social responsibility).*

Kegiatan *Corporate Social Responsibility* tidak terfokus kepada kegiatan *charity* saja, tetapi juga dalam bentuk program yang berkesinambungan. Hal ini dapat diwujudkan dalam bentuk pemberian kredit subsidi dan pelaksanaan Program Tanggung Jawab Sosial dan Lingkungan (TJSL).

Risiko Stratejik

Risiko Stratejik merupakan risiko akibat ketidaktepatan Bank dalam pengambilan dan/atau pelaksanaan suatu keputusan stratejik serta kegagalan dalam mengantisipasi perubahan lingkungan bisnis. Identifikasi risiko stratejik dilakukan berdasarkan atas faktor-faktor risiko stratejik pada aktivitas fungsional tertentu, seperti aktivitas perkreditan, treasuri dan investasi, serta operasional dan jasa melalui business plan yang disusun oleh satuan kerja stratejik sebagaimana yang dijabarkan dalam Kebijakan Umum.

Pengukuran Risiko Stratejik dan parameter pengukurannya dilakukan berdasarkan kinerja Bank yaitu dengan membandingkan hasil aktual dengan target yang telah ditetapkan. Pemantauan risiko stratejik dilakukan oleh CSPD secara berkala dengan memonitor pencapaian *Key Perfomance Indicato*r dan *risk exposure* dibandingkan dengan risk appetite bank.

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

e. Risk Management (continued)

Reputational Risk (continued)

CSD is responsible for implementing policies related to managing and settling negative issues or avoiding counter-productive information and performs the Public Service Obligation (PSO) function in connection with carrying out corporate social responsibility.

Corporate Social Responsibility is not focused only on charity, but also in the form of a sustainable program. This can be realized in the form of credit subsidies and implementation of the Social and Environmental Responsibility Program (SERP).

Strategic Risk

Strategic risk is the risk arising from the inaccuracies in the decision making and/or the execution of a strategic decision and failure to anticipate changes in the business environment. Strategic Risk identification is based on the strategic risk factors on specific functional activities, such as lending, treasury and investment activities, as well as operations and services through a business plan prepared by the strategic working unit as elaborated in the General Policy of the BOD.

Strategic risk and parameter measurement are based on the Bank's performance by comparing actual results with targets that have been set. Strategic risk monitoring is carried out by CSPD periodically to monitor the achievement of Key Performance Indicator and risk exposure compared to the Bank's risk appetite.

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

e. Manajemen Risiko (lanjutan)

Risiko Stratejik (lanjutan)

Selanjutnya, Dewan Komisaris, Direksi, Divisi dan Kantor Cabang mereviu strategi dasar yang fokus pada perubahan-perubahan antara lain struktur organisasi Bank, perkreditan komersial, pembiayaan perdagangan, treasuri, operasional dan kekuatan serta kelemahan sistem teknologi informasi.

Dalam pengendalian risiko stratejik, *Corporate Strategy and Planning Division* (CSPD) berfungsi menganalisa laporan aktual dan target rencana bisnis dan menyampaikannya kepada Direksi secara berkala.

Risiko Kepatuhan

Risiko Kepatuhan merupakan risiko yang timbul akibat Bank tidak mematuhi dan/atau tidak melaksanakan peraturan perundang-undangan dan ketentuan yang berlaku. Dalam mengidentifikasi risiko kepatuhan, *Compliance Division* (CMGD) melakukan kajian terkait dengan eksposur Risiko Kepatuhan terhadap ketentuan eksternal yang melekat pada ketentuan internal. Di samping itu, CMGD menganalisis kejadian yang menyebabkan timbulnya risiko kepatuhan dan menginformasikan hal tersebut ke DORD dan KOMAR untuk direviu.

Dalam rangka meminimalkan timbulnya Risiko Kepatuhan, *Legal Division* (LGD) telah menyediakan portal khusus yang bernama *Legal Application System* (LAPS) untuk memudahkan seluruh unit bisnis melakukan akses terhadap ketentuan internal Bank. Di samping itu, *Compliance Division* melakukan *monitoring* terhadap kejadian-kejadian yang menyebabkan timbulnya risiko kepatuhan dan menginformasikan hal tersebut ke DORD.

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

e. Risk Management (continued)

Strategic Risk (continued)

Furthermore, the BOC, BOD, Divisions and Branch Offices are reviewing the basic strategy that focuses on changes in among others, the organizational structure of the Bank, commercial lending, trade finance, treasury, operations and the strengths and weaknesses of information technology systems.

In controlling strategic risk, the Corporate Strategy and Planning Division (CSPD) analyzes actual results against target and periodically reports to the BOD.

Compliance Risk

Compliance Risk is a risk that arises as a result of the Bank not complying with and/or not implementing applicable laws and regulations. In identifying compliance risks, the Compliance Division (CMGD) conducts studies related to Compliance Risk exposure to external provisions that are attached to internal regulations. In addition, CMGD analyzes events that cause compliance risks and informs DORD and KOMAR for review.

In order to minimize the Compliance Risk, Legal Division (LGD) has provided a special access called Legal Application System (LAPS) for easy access to the internal regulations of the Bank for the entire business units. In addition, CMGD monitors the events that contributed to compliance risk and reports these matters to DORD.

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

e. Manajemen Risiko (lanjutan)

Risiko Kepatuhan (lanjutan)

Pengukuran risiko kepatuhan dilakukan untuk mengukur potensi kerugian yang disebabkan oleh ketidakpatuhan dan ketidakmampuan Bank dalam memenuhi ketentuan yang berlaku. Besarnya risiko kepatuhan diestimasi berdasarkan kemampuan Bank untuk memenuhi seluruh peraturan pada waktu yang lampau dan yang akan datang. Kegiatan-kegiatan ini termasuk mereviu semua penalti, litigasi, dan keluhan yang pernah diterima Bank.

Dalam pemantauan risiko kepatuhan, DORD dan CMGD bertugas untuk mengevaluasi efektivitas implementasi manajemen risiko dengan memantau secara berkala seluruh jenis kegiatan yang berpotensi menimbulkan risiko kepatuhan.

Secara berkala, IAD melakukan pemantauan terhadap hasil tindak lanjut audit baik dari intern maupun ekstern.

f. Informasi Lainnya

1. Pada tanggal 31 Desember 2024, 2023 dan 2022, rasio aset produktif yang diklasifikasikan non-performing terhadap jumlah aset produktif (*non-performing ratio*) masing-masing adalah sebesar 2,60%, 2,58% dan 2,74%.

2. Pada tanggal 31 Desember 2024, 2023 dan 2022, rasio jumlah cadangan kerugian penurunan nilai aset keuangan yang telah dibentuk berdasarkan PSAK No. 109 terhadap jumlah minimum cadangan kerugian penurunan nilai aset keuangan sesuai ketentuan Otoritas Jasa Keuangan masing-masing sebesar 104,73%, 121,99% dan 130,00%.

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

e. Risk Management (continued)

Compliance Risk (continued)

Compliance risk is assessed by measuring the potential loss caused by the Bank's non-compliance or inability to comply with prevailing regulations. The level of compliance risk is estimated based on the Bank's ability to comply with prevailing and upcoming regulations. These activities include reviewing all penalties, litigations and complaints received by the Bank.

In monitoring compliance risk, DORD and CMGD are responsible to evaluate the effectiveness of the implementation of risk management by monitoring regularly all kinds of activities that could potentially pose a compliance risk.

Periodically, IAD monitors and follow-up results of both internal and external audits.

f. Other Information

1. *As of December 31, 2024, 2023 and 2022, the Bank's non-performing assets to total earning assets (non-performing ratio) are 2.60%, 2.58% and 2.74%, respectively.*

2. *As of December 31, 2024, 2023 and 2022, the ratio of allowance for impairment losses on financial assets based on SFAS No. 109 to minimum allowance for impairment losses based on Financial Service Authorithy regulation is 104.73%, 121.99% and 130.00%, respectively.*

51.INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

f. Informasi Lainnya (lanjutan)

3. Kegiatan Jasa Kustodian

PT Bank Tabungan Negara (Persero) Tbk menyelenggarakan Jasa Kustodian (bank kustodian) sejak tahun 2023 berdasarkan Surat Keputusan Dewan Komisioner Otoritas Jasa Keuangan No. KEP-37/PM.2/2022 tanggal 17 November 2022.

Jasa kustodian yang diselenggarakan berada dibawah Divisi *Financial Institution and Capital Market*. Jasa yang diselenggarakan meliputi sebagai berikut :

- Jasa penyimpanan dan pengadministrasian (*safe keeping services*);
- Jasa Penyelesaian transaksi efek (*settlement handling*);
- Jasa pengurusan hak nasabah terkait dengan efek yang disimpan di kustodian (*corporate action*)
- Jasa perwalian/ mewakili nasabah untuk menghadiri dan meneruskan suara dalam RUPS, RUPSLB, RUPO (*proxy services*);
- Jasa Informasi dan pelaporan; (*Information & Reporting*, antara lain : *Portfolio Valuation Report, Settlement Report, Corporate Action Report*).
- Jasa *Custody* untuk kontrak pengelolaan dana, reksa dana yang diterbitkan oleh manajer investasi

Aset milik nasabah yang diadministrasikan oleh kustodian BTN per 31 Desember 2024 dan 2023 sebesar ekuivalen Rp12.077.710 juta dan Rp7.941.087 juta yang terdiri dari saham, surat berharga Negara (SBN), obligasi koorporasi baik dalam mata uang rupiah maupun USD.

Asset yang diadministrasikan jasa kustodian tidak termasuk dalam laporan posisi keuangan.

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

f. Other Information (continued)

3. Custodian Services Activities

PT Bank Tabungan Negara (Persero) Tbk provides Custodian Services (custodian bank) since 2023 based on Decree of the Board of Commissioners of the Financial Services Authority No. KEP-37/PM.2/2022 dated November 17, 2022.

Custodian services provided are under the Financial Institution and Capital Market Division. Services provided include the following:

- *Storage and administration services (safe keeping services);*
- *Securities transaction settlement services (Settlement Handling);*
- *Customer rights management services related to securities held at the custodian (corporate action)*
- *Trustee services/representing customers to attend and transmit votes at the GMS, EGMS, RUPO (proxy services);*
- *Information and reporting services; (Information & Reporting, including: Portfolio Valuation Report, Settlement Report, Corporate Action Report).*
- *Custody services for fund management contracts, mutual funds issued by investment managers*

Customer-owned assets administered by BTN custodian as of December 31,2024 and 2023 amount to the equivalent of Rp12,077,710 million and Rp7,941,087 million consisting of shares, government securities (SBN), corporate bonds both in rupiah and USD.

Assets administered by custodian services are not included in the consolidated statement of financial position.

51. INFORMASI TAMBAHAN (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

f. Informasi Lainnya (lanjutan)

d. Kontribusi Pendapatan Pajak dan PNBP

Pada tanggal 31 Desember 2024 dan 2023 kontribusi BTN terhadap Pendapatan Pajak dan PNBP adalah sebagai berikut (tidak diaudit):

51. ADDITIONAL INFORMATION (continued)

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

f. Other Information (continued)

d. Contribution of Tax and Non Tax Revenue

As of December 31, 2024 and 2023, BTN's contribution to tax and non tax revenue are as follows (unaudited):

Jenis Kontribusi	**31 Desember/*December 31,* 2024**	**31 Desember/*December 31,* 2023**	***Type of Contribution***
Pajak			*Tax*
Pajak Penghasilan	3.715.115	3.123.042	*Income Tax*
Pajak Pertambahan Nilai dan Pajak Penjualan atas Barang Mewah	25.904	24.307	*Added Value Tax and Luxury Good Sales Tax*
Bea Masuk/Keluar, Bea dan Cukai, dan Bea Materai	9.353	1.897	*Import/Export Duty, Customs, and Stamp Duty*
Pajak Bumi dan Bangunan, P3 (Perkebunan, Perhutanan, Pertambangan)	13.434	365	*Land and Building Tax, Estate, Forestry, Mining Tax*
Pajak Pemerintah Pusat Lainnya (Pajak Karbon)	-	-	*Other Central Government Tax* (*Carbon Tax*)
Pajak Daerah dan Retribusi Daerah	-	-	*Regional Government Tax and Levies*
Total Kontribusi Pajak	3.763.806	3.149.611	*Total of Tax Contribution*
Penerimaan Negara Bukan Pajak			*Non Tax Revenue*
Dividen	420.119	365.409	*Dividend*
Penerimaan Negara Bukan Pajak Lainnya	-	-	*Other Non Tax Revenue*
Total Kontribusi Penerimaan Negara Bukan Pajak	420.119	365.409	*Total of Non Tax Revenue*
Total Kontribusi kepada Negara	**4.183.925**	**3.515.020**	***Total of Contribution to Nation***

*Pajak Penghasilan terdiri dari PPh Badan, PPh Pasal 21 Perorangan, PPh Pasal 22, PPh Pasal 23, PPh Pasal 26, dan PPh Pasal 4 ayat 2

**Income Tax consists of Corporate Income Tax, PPh Pasal 21, PPh Pasal 22, PPh Pasal 23, PPh Pasal 26, and PPh Pasal 4 ayat 2*

52. PERISTIWA SETELAH TANGGAL PERIODE LAPORAN

Pada tanggal 15 Januari 2025, Bank dan PT Victoria Investama Tbk ("VICO") dan PT Bank Victoria International Tbk ("BVIC") telah melakukan penandatanganan Perjanjian Jual Beli Saham sehubungan dengan rencana pengambilalihan yang akan dilakukan oleh Bank atas PT Bank Victoria Syariah ("BVIS"), dimana Bank akan melakukan pengambilalihan melalui pembelian atas saham yang dimiliki VICO dan BVIC yang tunduk pada persyaratan dan ketentuan dalam Perjanjian Jual Beli Saham Bersyarat tersebut. Selain itu Bank juga akan membeli seluruh saham BHP Jakarta, yang merupakan pemegang saham lain BVIS, yang sahamnya dimiliki oleh VICO dengan melakukan penandatanganan Akta Jual Beli.

Beberapa persyaratan telah dipenuhi oleh masing-masing pihak, antara lain persetujuan rancangan pengambilalihan dari Dewan Komisaris, izin prinsip pengambilalihan dari Otoritas Jasa Keuangan dan hal-hal lainnya yang dipersyaratkan dalam Perjanjian Jual Beli Saham Bersyarat tersebut.

Setelah efektifnya pengambilalihan oleh Bank, Bank akan menjadi Pemegang Saham Pengendali. Kedepannya Laporan Keuangan BVIS akan dikonsolidasikan oleh Bank.

52. EVENT AFTER THE REPORTING DATE

On January 15, 2025, the Bank and PT Victoria Investama Tbk ("VICO") dan PT Bank Victoria International Tbk ("BVIC") have signed the Conditional Share Sale and Purchase Agreement in connection with the acquisition plan to be carried out by the Bank of PT Bank Victoria Syariah ("BVIS"), where the Bank will carry out the acquisition by purchasing shares owned by VICO and BVIC which are subject to the terms and conditions in the Conditional Share Sale and Purchase Agreement. In addition, the Bank will also purchase all shares of BHP Jakarta, the other share holder of BVIS that the shares owned by VICO by signing the Sale and Purchase Deed.

Several requirements have been met by each party, including approval of the takeover plan from Board of Commissioners, principal takeover permits from the Financial Services Authority and other matters required in the Conditional Share Purchase Agreement.

After the effective acquisition by Bank, Bank will become the Controlling Shareholder. Going forward, BVIS's Financial Statements will be consolidated by Bank.

53. PENYELESAIAN LAPORAN KEUANGAN

Manajemen Bank bertanggung jawab penuh terhadap penyajian laporan keuangan terlampir yang diselesaikan dan disetujui untuk diterbitkan pada tanggal 12 Februari 2025.

53. COMPLETION OF THE FINANCIAL STATEMENTS

The management of the Bank is fully responsible for the preparation of the accompanying Financial Statements which were completed and authorized for issuance on 12 February, 2025.

Program Pendanaan Usaha Mikro dan Usaha Kecil
PT Bank Tabungan Negara (Persero) Tbk

Laporan keuangan tanggal 31 Desember 2024
dan untuk tahun yang berakhir pada tanggal tersebut
beserta laporan auditor independen

SURAT PERNYATAAN PENGELOLA
TENTANG TANGGUNG JAWAB ATAS LAPORAN KEUANGAN
TANGGAL 31 DESEMBER 2024
DAN UNTUK TAHUN YANG BERAKHIR PADA TANGGAL TERSEBUT
PROGRAM PENDANAAN USAHA MIKRO DAN USAHA KECIL
PT BANK TABUNGAN NEGARA (PERSERO) Tbk

Kami, yang bertanda tangan di bawah ini:

1. Nama : Nixon L.P. Napitupulu
   Alamat Kantor : Jl. H. Rasuna Said No. 1, Jakarta 12980
   Alamat domisili atau sesuai KTP : Jl. Wijaya I No. 13
   Kel. Petogogan, Kec. Kebayoran Baru
   Jakarta Selatan
   Nomor telepon : 021-6336789
   Jabatan : Direktur Utama

2. Nama : Muhammad Iqbal
   Alamat Kantor : Jl. H. Rasuna Said No. 1, Jakarta 12980
   Alamat domisili atau sesuai KTP : Jl. H. Abu No. 9
   Kel. Cipete Selatan, Kec. Cilandak
   Jakarta Selatan
   Nomor telepon : 021-6336789
   Jabatan : Direktur

menyatakan bahwa:

1. Kami bertanggung jawab atas penyusunan dan penyajian laporan keuangan Program Pendanaan Usaha Mikro dan Usaha Kecil PT Bank Tabungan Negara (Persero) Tbk;

2. Laporan keuangan Program Pendanaan Usaha Mikro dan Usaha Kecil PT Bank Tabungan Negara (Persero) Tbk telah disusun dan disajikan sesuai dengan Standar Akuntansi Keuangan Entitas Tanpa Akuntabilitas Publik di Indonesia;

3. a. Semua informasi dalam laporan keuangan Program Pendanaan Usaha Mikro dan Usaha Kecil PT Bank Tabungan Negara (Persero) Tbk telah dimuat secara lengkap dan benar; dan

   b. Laporan keuangan Program Pendanaan Usaha Mikro dan Usaha Kecil PT Bank Tabungan Negara (Persero) 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 Program Pendanaan Usaha Mikro dan Usaha Kecil PT Bank Tabungan Negara (Persero) Tbk.

Demikian pernyataan ini dibuat dengan sebenarnya.

Jakarta, 27 Februari 2025



Nixon L.P. Napitupulu	Muhammad Iqbal
Direktur Utama	Direktur

Paraf :

PT Bank Tabungan Negara (Persero) Tbk
Kantor Pusat
Menara Bank BTN
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PROGRAM PENDANAAN USAHA MIKRO DAN USAHA KECIL
PT BANK TABUNGAN NEGARA (PERSERO) Tbk
LAPORAN KEUANGAN
TANGGAL 31 DESEMBER 2024
DAN UNTUK TAHUN YANG BERAKHIR PADA TANGGAL TERSEBUT
BESERTA LAPORAN AUDITOR INDEPENDEN

Daftar Isi

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Laporan Auditor Independen

Laporan No. 00129/2.1032/AU.2/10/1681-2/1/II/2025

Pengelola Program Pendanaan Usaha Mikro dan Usaha Kecil
PT Bank Tabungan Negara (Persero) Tbk.

Opini

Kami telah mengaudit laporan keuangan Program Pendanaan Usaha Mikro dan Usaha Kecil PT Bank Tabungan Negara (Persero) Tbk. ("PUMK") terlampir, yang terdiri dari laporan posisi keuangan tanggal 31 Desember 2024, serta laporan aktivitas 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 PUMK tanggal 31 Desember 2024, serta aktivitas dan arus kasnya untuk tahun yang berakhir pada tanggal tersebut, sesuai dengan Standar Akuntansi Keuangan Entitas Tanpa Akuntabilitas Publik 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 PUMK 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.

Purwantono, Sungkoro & Surja
Registered Public Accountants KMK No. 603/KM.1/2015
A member firm of Ernst & Young Global Limited

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 Entitas Tanpa Akuntabilitas Publik 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 PUMK 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 PUMK atau menghentikan operasi, atau tidak memiliki alternatif yang realistis selain melaksanakannya.

Pihak yang bertanggung jawab atas tata kelola bertanggung jawab untuk mengawasi proses pelaporan keuangan PUMK.

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 memperoleh 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.

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 PUMK.

- 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 PUMK 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 PUMK 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.

KAP Purwantono, Sungkoro & Surja

Christophorus Alvin Kossim
Registrasi Akuntan Publik No. AP.1681

27 Februari 2025

PROGRAM PENDANAAN USAHA MIKRO DAN USAHA KECIL
PT BANK TABUNGAN NEGARA (PERSERO) Tbk
LAPORAN POSISI KEUANGAN
Tanggal 31 Desember 2024
(Disajikan dalam Rupiah)

	Catatan	31 Desember 2024	31 Desember 2023*)
ASET			
Kas dan Setara Kas	2b,2j,4,11	11.036.287.064	10.970.559.980
Piutang Pinjaman Mitra Binaan – neto	2c,2e,5,12		
(Setelah dikurangi Penyisihan Penurunan Nilai Piutang Pinjaman Sebesar Rp 36.675.501.169 dan Rp36.893.857.090 Masing-Masing Pada Tanggal 31 Desember 2024 dan 2023)		4.193.604.781	12.551.634.259
JUMLAH ASET LANCAR		**15.229.891.845**	**23.522.194.239**
ASET TIDAK LANCAR			
Piutang Kerjasama PUMK Kepada mitra binaan - neto (Setelah dikurangi Penyisihan Penurunan Nilai Piutang Pinjaman Sebesar Rp34.878.957 dan RpNihil Masing-Masing Pada Tanggal 31 Desember 2024 dan 2023)	2c,2e,6,12	13.676.060.027	786.000.000
Piutang Kerjasama PUMK kepada BRI	8,11,12	4.415.454.240	7.214.000.000
JUMLAH ASET TIDAK LANCAR		**18.091.514.267**	**8.000.000.000**
JUMLAH ASET		**33.321.406.112**	**31.522.194.239**
ASET NETO			
Aset Neto Tidak Terikat	2f,7	33.321.406.112	31.522.194.239
JUMLAH LIABILITAS DAN ASET NETO		**33.321.406.112**	**31.522.194.239**

*) setelah reklasifikasi (Catatan 12)

PROGRAM PENDANAAN USAHA MIKRO DAN USAHA KECIL
PT BANK TABUNGAN NEGARA (PERSERO) Tbk
LAPORAN AKTIVITAS
Untuk Tahun yang Berakhir pada Tanggal
31 Desember 2024
(Disajikan dalam Rupiah)

		Tahun yang berakhir pada tanggal	
	Catatan	**31 Desember 2024**	**31 Desember 2023**
PERUBAHAN ASET NETO TIDAK TERIKAT			
PENDAPATAN			
Pendapatan Jasa Administrasi Pinjaman	2g,9	1.501.968.937	1.065.855.899
Pendapatan Lain-Lain	2h,10	113.765.972	2.744.099
		1.615.734.909	**1.068.599.998**
BEBAN			
Pembalikan (beban) Penyisihan Penurunan Nilai Piutang Pinjaman	2i,5c,6c	183.476.964	(3.098.485.363)
Beban Lain-Lain		-	(75.438.092)
		183.476.964	**(3.173.923.455)**
KENAIKAN (PENURUNAN) ASET NETO TIDAK TERIKAT		**1.799.211.873**	**(2.105.323.457)**
ASET NETO PADA AWAL TAHUN		**31.522.194.239**	**33.627.517.696**
ASET NETO PADA AKHIR TAHUN		**33.321.406.112**	**31.522.194.239**

PROGRAM PENDANAAN USAHA MIKRO DAN USAHA KECIL
PT BANK TABUNGAN NEGARA (PERSERO) Tbk
LAPORAN ARUS KAS
Untuk Tahun yang Berakhir pada Tanggal
31 Desember 2024
(Disajikan dalam Rupiah)

	Catatan	Tahun yang berakhir pada tanggal 31 Desember 2024	31 Desember 2023
ARUS KAS DARI AKTIVITAS OPERASI			
Pencairan Pinjaman Mitra Binaan		-	(9.161.600.000)
Pengalihan Pengelolaan Dana Mitra Binaan	8	(10.000.000.000)	(8.000.000.000)
Penerimaan Pokok Angsuran		8.501.789.249	15.264.329.788
Pendapatan Jasa Administrasi Pinjaman		1.450.172.764	1.132.613.855
Pendapatan Lain-Lain	10	113.765.071	2.744.099
KAS NETO YANG DIPEROLEH DARI/ (DIGUNAKAN UNTUK) AKTIVITAS OPERASI		**65.727.084**	**(761.912.258)**
(PENURUNAN) KENAIKAN NETO DALAM KAS DAN SETARA KAS		**65.727.084**	**(761.912.258)**
KAS DAN SETARA KAS AWAL TAHUN		10.970.559.980	11.732.472.238
KAS DAN SETARA KAS AKHIR TAHUN		**11.036.287.064**	**10.970.559.980**

Catatan atas laporan keuangan terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan secara keseluruhan

1. PENJELASAN UMUM

a. Pendirian dan Informasi Umum

Program Tanggung Jawab Sosial dan Lingkungan Badan Usaha Milik Negara PT Bank Tabungan Negara (Persero) Tbk dilaksanakan sesuai dengan Peraturan Menteri Badan Usaha Milik Negara Republik Indonesia No. PER-1/MBU/03/2023 tanggal 3 Maret 2023 tentang Penugasan Khusus dan Program Tanggung Jawab Sosial dan Lingkungan Badan Usaha Milik Negara, yang antara lain mengatur bahwa, sebagaimana disebut dalam Pasal 23 ayat (3), laporan keuangan dan pelaksanaan Program TJSL BUMN dilaporkan menjadi satu kesatuan dalam laporan berkala dan laporan tahunan kinerja BUMN Pembina.

Selain hal di atas, antara lain, sebagaimana diatur dalam Pasal 23 ayat (4), untuk laporan keuangan dan pelaksanaan Program Pendanaan Usaha Mikro dan Usaha Kecil tahunan tetap dilaporkan tersendiri dan harus diaudit oleh Kantor Akuntan Publik secara terpisah dari audit laporan keuangan BUMN Pembina.

Definisi Program Pendanaan Usaha Mikro dan Usaha Kecil mengacu kepada Peraturan Menteri Badan Usaha Milik Negara Republik Indonesia No. PER-1/MBU/03/2023 tanggal 3 Maret 2023 tentang Penugasan Khusus dan Program Tanggung Jawab Sosial dan Lingkungan Badan Usaha Milik Negara dan ketentuan-ketentuan peraturan pelaksanaannya adalah tentang Program Pendanaan UMK yang bertujuan untuk meningkatkan kemampuan usaha kecil agar menjadi tangguh dan mandiri melalui pemanfaatan dana BUMN.

b. Kegiatan Utama

Kegiatan utama Program Pendanaan Usaha Mikro dan Usaha Kecil (UMK) adalah penyaluran pinjaman dan penyaluran dana pembinaan. Dana Program Pendanaan UMK kepada Mitra Binaan disalurkan dalam bentuk:

a. Berdasarkan Surat Menteri Badan Usaha Milik Negara No. S-721/MBU/11/2022 tanggal 10 November 2022 (Poin 3), kementerian merokemendasikan PT Bank Rakyat Indonesia (Persero) Tbk sebagai pengelola Kerja Sama Program PUMK, sehingga sejak tahun 2023, Perusahaan sudah tidak menyalurkan
b. Pinjaman untuk membiayai modal kerja dalam rangka meningkatkan produksi dan penjualan.
c. Pinjaman khusus untuk membiayai kebutuhan yang bersifat jangka pendek dalam rangka memenuhi pesanan dari rekanan usaha mitra binaan.
d. Beban pembinaan:
    1) Untuk membiayai pendidikan, pelatihan, penelitian, pemagangan, pemasaran, promosi, yang menyangkut peningkatan kualitas sumber daya manusia dan kemampuan pengelolaan usahanya;
    2) Beban pembinaan hanya dapat diberikan kepada atau untuk kepentingan Mitra Binaan

c. Struktur Organisasi dan Susunan Pengelola

Susunan pengelola Program Pendanaan UMK BTN pada tanggal-tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut:

	2024	2023
Pembina	Nixon L.P. Napitupulu Muhammad Iqbal**	Nixon L.P. Napitupulu Hirwandi Gafar*
Program Pendanaan UMK		
Pimpinan	Roganda S. Mangapul Siahaan	Roganda S. Mangapul Siahaan
Pelaksana	Ardi Darmawan	Ardi Darmawan
Pelaksana	Mayang Shafira S	Mayang Shafira S
Pelaksana	Diandary Denovari	Diandary Denovari

1. PENJELASAN UMUM (lanjutan)

c. Struktur Organisasi dan Susunan Pengelola (lanjutan)

Tahun 2024
**) Menjadi Pembina Program Pendanaan UMK sejak Maret 2024

Tahun 2023
*) Menjadi Pembina Program Pendanaan UMK s.d Maret 2024

Mulai tahun 2023, struktur pengelola Program TJSL BUMN mengikuti peraturan terbaru dari Meneg BUMN No. PER-1/MBU/03/2023 dimana Program TJSL BUMN dilaporkan terpisah dan menjadi satu kesatuan dari laporan keuangan BUMN Pembina.

d. Ketentuan Program Pendanaan UMK Mengacu kepada Peraturan Meneg BUMN No. PER-1/MBU/03/2023 tanggal 3 Maret 2023

1) Program Pendanaan UMK adalah program untuk meningkatkan kemampuan usaha mikro dan usaha kecil agar menjadi tangguh dan mandiri.

2) Dalam peraturan di atas diatur tentang kriteria usaha mikro dan usaha kecil yang berhak menjadi mitra binaan BUMN, antara lain, sebagai berikut:
   i) dimiliki oleh warga negara Indonesia.
   ii) belum memenuhi kriteria atau memiliki akses pinjaman kepada lembaga pendanaan atau perbankan.
   iii) diutamakan usaha mikro dan usaha kecil dengan jenis usaha yang sejalan dengan bidang dan/atau mendukung bisnis BUMN.
   iv) diutamakan usaha mikro dan usaha kecil yang berlokasi di wilayah kerja BUMN.
   v) berdiri sendiri, bukan merupakan anak perusahaan atau cabang perusahaan yang dimiliki, dikuasai, atau berafiliasi secara langsung maupun tidak langsung, dengan usaha menengah atau usaha besar.
   vi) berbentuk usaha orang perseorangan dan/atau sekelompok orang, badan usaha yang tidak berbadan hukum, atau badan usaha yang berbadan hukum.
   vii) mempunyai potensi dan prospek usaha untuk dikembangkan.

3) Bentuk dan maksimum pendanaannya adalah sebagai berikut:
   a. Pemberian modal kerja dalam bentuk pinjaman dan/atau pembiayaan syariah dengan jumlah pinjaman dan/atau pembiayaan syariah untuk setiap usaha mikro dan usaha kecil paling banyak Rp250.000.000.
   b. Pendanaan tambahan dalam bentuk pinjaman dan/atau pembiayaan syariah untuk membiayai kebutuhan yang bersifat jangka pendek maksimal 1 tahun untuk memenuhi pesanan dari rekanan usaha mikro dan usaha kecil dengan jumlah paling banyak Rp100.000.000.
   c. Modal kerja dalam bentuk pinjaman sebagaimana dimaksud pada huruf a dikenakan jasa administrasi sebesar:
      - 3% (tiga persen) efektif per tahun;
      - suku bunga flat (tetap) yang setara dengan 3% (tiga persen) efektif per tahun; atau
      - ketentuan lain yang ditetapkan Menteri,

      dengan jangka waktu/tenor pinjaman paling lama 3 (tiga) tahun.
   d. Pembiayaan syariah sebagaimana dimaksud pada huruf a diberikan berdasarkan:
      - prinsip jual beli, maka proyeksi margin yang dihasilkan disetarakan dengan margin sebesar jasa administrasi sebagaimana dimaksud pada ayat (2); atau
      - prinsip bagi hasil, maka rasio bagi hasil yang diterima BUMN mulai dari 10% (sepuluh persen) sampai dengan paling banyak 50% (lima puluh persen) berdasarkan perjanjian.

1. PENJELASAN UMUM (lanjutan)

d. Ketentuan Program Pendanaan UMK Mengacu kepada Peraturan Meneg BUMN No. PER-1/MBU/03/2023 tanggal 3 Maret 2023 (lanjutan)

4) Syarat dan kondisi:

Untuk tata cara penyaluran pinjaman dan/atau pembiayaan syariah dalam Program Pendanaan UMK diatur syarat dan kondisi yang harus dipenuhi calon usaha binaan, antara lain, harus menyampaikan rencana dan/atau proposal kegiatan usaha kepada BUMN Pembina yang nanti akan dilakukan seleksi dan evaluasi atas permohonan yang diajukan oleh calon usaha mikro dan usaha kecil.

BUMN Pembina yang nanti akan dilakukan seleksi dan evaluasi atas permohonan yang diajukan oleh calon usaha mikro dan usaha kecil.

Bagi calon binaan yang memenuhi syarat dan terpilih akan dibuatkan surat perjanjian dan/atau kontrak yang berisi syarat dan kondisi tentang hak dan kewajiban yang harus dipenuhi para pihak. Namun, sebelum dilakukan perjanjian, calon usaha mikro dan usaha kecil binaan tersebut harus terlebih dahulu menyelesaikan proses administrasi terkait dengan rencana pemberian modal kerja oleh perusahaan/BUMN bersangkutan.

5) Teknis pelaksanaan penyaluran Program Pendanaan UMK:

Dalam pelaksanaan penyaluran Program Pendanaan UMK, BUMN Pembina dapat bekerjasama dengan BUMN lain, Anak perusahaan BUMN atau Perusahaan terafiliasi BUMN yang memiliki bisnis sebagai lembaga pembiayaan dan perbankan atau memiliki kemampuan dalam menyalurkan pinjaman.

Ketentuan pelaksanaan kerja sama dimaksud di atas dituangkan dalam surat perjanjian dan/atau kontrak yang paling sedikit memuat hak dan kewajiban serta tugas dan tanggung jawab masing-masing pihak.

6) Sumber dana Program TJSL BUMN berasal dari:

i) anggaran kegiatan yang diperhitungkan sebagai biaya pada BUMN pembina dalam tahun anggaran berjalan.
ii) penyisihan sebagian laba bersih BUMN Pembina pada tahun anggaran sebelumnya dan/atau.
iii) sumber lain yang sah sesuai dengan ketentuan peraturan perundang-undangan.

7) Sumber dana untuk Program Pendanaan UMK, selain sumber dana sebagaimana dimaksud pada angka 6) di atas, dapat berasal dari:

i) saldo dana Program Pendanaan UMK yang teralokasi sampai dengan akhir tahun 2015; dan/atau;
ii) jasa administrasi pinjaman/marjin/bagi hasil, bunga deposito dan/atau jasa giro dari dana Program Pendanaan UMK

8) Besaran dana Program TJSL BUMN sebagaimana dijelaskan pada angka 6.i) dan angka 6.ii) di atas, ditetapkan dalam rencana kerja anggaran perusahaan yang disahkan oleh RUPS/Menteri.

9) Pembebanan beban operasional Program TJSL BUMN:

- Pembebanan beban operasional Program TJSL BUMN menjadi beban BUMN Pembina.
- Pembebanan beban kepada usaha mikro dan usaha kecil menjadi bagian dari biaya Program TJSL BUMN.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN

a. Dasar Penyajian Laporan Keuangan

Laporan keuangan disusun berdasarkan Standar Akuntansi Keuangan Entitas Tanpa Akuntabilitas Publik (SAK ETAP) yang diterbitkan oleh Dewan Standar Akuntansi Keuangan - Ikatan Akuntan Indonesia dan mempertimbangkan Surat Edaran Kementerian BUMN No. SE-02/MBU/WK/2012 yang dikeluarkan tanggal 23 Februari 2012 perihal penetapan pedoman akuntansi Program Kemitraan dan Bina Lingkungan.

Laporan keuangan disusun menggunakan dasar akrual kecuali untuk Laporan Arus Kas disusun menggunakan dasar kas. Laporan Arus Kas menyajikan penerimaan dan pengeluaran kas yang diklasifikasikan dalam aktivitas operasi, investasi dan pendanaan yang disusun dengan menggunakan metode langsung (*direct method*). Tahun buku Program Pendanaan UMK BTN adalah 1 Januari sampai 31 Desember dan mata uang penyajian yang digunakan dalam laporan keuangan adalah Rupiah yang juga merupakan mata uang fungsional Program Pendanaan UMK BTN.

b. Kas dan Setara Kas

Kas dan setara kas adalah saldo kas dan bank yang dapat dipergunakan secara bebas untuk membiayai kegiatan Program Pendanaan UMK tidak digunakan sebagai jaminan. Saldo kas dan setara kas dicatat sebesar nilai nominalnya.

c. Piutang Pinjaman Mitra Binaan

Piutang pinjaman mitra binaan adalah pinjaman yang disalurkan oleh PT Bank Tabungan Negara kepada mitra binaan, sesuai dengan ketentuan yang berlaku. Saldo piutang pinjaman mitra binaan termasuk piutang pinjaman mitra binaan yang disalurkan oleh Perusahaan dan piutang pinjaman mitra binaan yang disalurkan melalui PT Bank Rakyat Indonesia (Persero) Tbk sesuai dengan Surat Menteri Badan Usaha Milik Negara No.S-721/MBU/11/2022 tanggal 10 November 2022 (Poin 3), kementerian merokemendasikan PT Bank Rakyat Indonesia (Persero) Tbk sebagai pengelola Kerja Sama Program PUMK.

Piutang pinjaman mitra binaan diakui pada saat pinjaman disalurkan kepada mitra binaan dan diukur serta dicatat sebesar jumlah bersih yang diharapkan dapat ditagih dari mitra binaan.

Penggolongan kualitas piutang pinjaman mitra binaan dilakukan berdasarkan Peraturan Menteri BUMN serta dengan ketentuan sebagai berikut:

i) lancar, dalam hal pembayaran angsuran pokok dan jasa administrasi pinjaman tepat waktu atau terjadi keterlambatan pembayaran angsuran pokok dan/atau jasa administrasi pinjaman paling lambat 30 hari dari tanggal jatuh tempo pembayaran angsuran, sesuai dengan perjanjian yang telah disetujui bersama,
ii) kurang lancar, dalam hal terjadi keterlambatan pembayaran angsuran pokok dan/atau jasa administrasi pinjaman yang telah melampaui 30 hari sampai dengan 180 hari dari tanggal jatuh tempo pembayaran angsuran, sesuai dengan perjanjian yang telah disetujui bersama,
iii) diragukan, dalam hal terjadi keterlambatan pembayaran angsuran pokok dan/atau jasa administrasi pinjaman yang telah melampaui 180 hari sampai dengan 270 hari dari tanggal jatuh tempo pembayaran angsuran, sesuai dengan perjanjian yang telah disetujui bersama,
iv) macet, dalam hal terjadi keterlambatan pembayaran angsuran pokok dan/atau jasa administrasi pinjaman yang telah melampaui 270 hari dari tanggal jatuh tempo pembayaran angsuran, sesuai dengan perjanjian yang telah disetujui bersama.

2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)

d. Piutang Jasa Administrasi Pinjaman

Piutang bunga/jasa administrasi pinjaman mitra binaan terkait dengan piutang bunga jasa administrasi atas pinjaman yang dicatat secara akrual untuk piutang pinjaman mitra binaan yang disalurkan oleh Perusahaan dan piutang pinjaman mitra binaan yang disalurkan melalui PT Bank Rakyat Indonesia (Persero) Tbk yang dibentuk oleh Perusahaan pada akhir periode akuntansi..

e. Penyisihan Penurunan Nilai Piutang Pinjaman

Penyisihan penurunan nilai piutang pinjaman adalah besarnya penyisihan atas piutang pinjaman yang mungkin tidak tertagih dihitung berdasarkan estimasi kerugian yang tidak dapat ditagih.

Penyisihan penurunan nilai piutang pinjaman diakui saat akhir periode akuntansi dan diukur dan dicatat sebesar estimasi kerugian yang tidak dapat ditagih. Penyisihan penurunan nilai piutang pinjaman dihitung secara kolektif berdasarkan persentase tertentu tingkat ketertagihan (*collection*) data historis yang ada.

f. Aset Neto

Aset neto adalah aset dikurangi dengan liabilitas. Aset neto diklasifikasikan menjadi Aset Neto Terikat (ANT) dan Aset Neto Tidak Terikat (ANTT).

ANT adalah sumber daya yang penggunaannya dibatasi untuk tujuan tertentu atau tidak dapat digunakan untuk kegiatan operasi normal. ANTT adalah sumber daya yang penggunaannya tidak dibatasi untuk tujuan tertentu.

g. Pendapatan Jasa Administrasi Pinjaman

Pendapatan jasa administrasi pinjaman adalah pendapatan jasa yang dipungut atas pinjaman dana Program Pendanaan UMK yang disalurkan kepada mitra binaan. Akrual pendapatan jasa administrasi pinjaman diakui hanya untuk piutang dengan status lancar dan kurang lancar dan diukur serta dicatat berdasarkan nilai yang telah jatuh tempo sesuai dengan kontrak.

h. Pendapatan Lain-lain

Pendapatan lain-lain adalah pendapatan yang tidak dapat digolongkan menurut klasifikasi pendapatan yang telah disebutkan di atas dan diakui pada saat diterima. Pendapatan lain-lain diukur dan dicatat sebesar nilai yang diterima Program Pendanaan UMK BTN.

i. Beban (Pembalikan) Penyisihan Penurunan Nilai Piutang Pinjaman

Beban (pembalikan) penyisihan penurunan nilai piutang pinjaman adalah beban (pendapatan) yang timbul akibat pembentukan (pembalikan) penyisihan penurunan nilai atas piutang pinjaman yang mungkin tidak tertagih.

j. Transaksi dengan pihak berelasi

Program Pendanaan UMK BTN melakukan transaksi dengan pihak-pihak berelasi seperti yang didefinisikan dalam SAK-ETAP tentang “Pengungkapan Pihak-Pihak yang Mempunyai Hubungan Istimewa”, yang didefinisikan antara lain:

a. Pihak yang memiliki pengendalian, pengendalian bersama atau pengaruh signifikan atas entitas.
b. Entitas anak, *joint venture*, entitas asosiasi dari entitas.
c. Personel manajemen kunci dari entitas dan entitas induknya (secara agregat).
d. Pihak-pihak yang mempunyai hubungan istimewa lainnya.

3. PENGGUNAAN PERTIMBANGAN, ESTIMASI DAN ASUMSI

a. Pertimbangan

Sesuai Peraturan Menteri BUMN, beban operasional Program Pendanaan UMK menjadi beban PT Bank Tabungan Negara (Persero) Tbk selaku BUMN Pembina.

Mata uang fungsional Program Pendanaan UMK BTN adalah mata uang dari lingkungan ekonomi primer dimana Program Pendanaan UMK BTN beroperasi. Mata uang tersebut adalah mata uang yang mempengaruhi pendapatan dan beban dari jasa yang diberikan. Program Pendanaan UMK BTN menentukan bahwa mata uang fungsionalnya adalah Rupiah.

b. Estimasi dan asumsi

Setiap akhir periode pelaporan, Program Pendanaan UMK BTN menelaah penyisihan penurunan nilai secara kolektif terhadap risiko kredit mitra binaan yang dikelompokkan berdasarkan karakteristik kredit yang sama, yang meskipun tidak diidentifikasi secara spesifik memerlukan penyisihan tertentu, memiliki risiko yang lebih besar tidak tertagih dibandingkan dengan piutang yang diberikan kepada mitra binaan. Penyisihan kerugian penurunan nilai piutang pinjaman mitra binaan dihitung berdasarkan kajian nilai terkini dan historis tingkat ketertagihan dari piutang. Penyisihan piutang mitra binaan dihitung berdasarkan estimasi kerugian yang tidak dapat ditagih yaitu secara kolektif berdasarkan persentase tertentu tingkat ketertagihan (collection) data historis yang ada (minimal 2 tahun). Penyisihan ini disesuaikan secara berkala untuk mencerminkan hasil aktual dan estimasi.

4. KAS DAN SETARA KAS

Kas dan Setara Kas merupakan penempatan dana Program Pendanaan UMK pada rekening giro di PT Bank Tabungan Negara (Persero) Tbk yang terdiri dari:

	31 Desember 2024	31 Desember 2023
Program Pendanaan UMK yaitu:		
- Rekening Giro Kantor Pusat	11.036.287.064	10.970.559.980
Jumlah Kas dan Setara Kas	**11.036.287.064**	**10.970.559.980**

5. PIUTANG PINJAMAN MITRA BINAAN

a. Rincian Piutang Pinjaman Mitra Binaan Berdasarkan Wilayah

	31 Desember 2024	31 Desember 2023
Wilayah Jawa Barat	5.084.263.634	5.779.107.438
Wilayah DKI Jakarta dan Banten	13.130.145.743	15.215.434.274
Wilayah Jawa Timur, Bali, NTB dan NTT	4.837.619.646	6.659.898.548
Wilayah Sumatera	5.152.579.970	6.045.421.412
Wilayah Kalimantan, Sulawersi, Maluku dan Papua	8.759.471.702	10.496.088.209
Wilayah D.I Yogyakarta dan Jawa Tengah	3.856.242.055	5.126.161.217
Jumlah Piutang Pinjaman	**40.820.322.750**	**49.322.111.098**
Dikurangi penyisihan penurunan nilai piutang pinjaman	(36.675.501.169)	(36.893.857.090)
	4.144.821.581	**12.428.254.008**
Piutang pendapatan jasa administrasi	48.783.200	123.380.251
Neto	**4.193.604.781**	**12.551.634.259**

5. PIUTANG PINJAMAN MITRA BINAAN (lanjutan)

b. Rincian Piutang Pinjaman Mitra Binaan Berdasarkan Kualitas Pinjaman

	31 Desember 2024		
	Saldo Piutang	**Penyisihan Penurunan Nilai Piutang Pinjaman**	**Saldo Piutang - Neto**
Lancar	388.990.786	17.595.221	371.395.565
Kurang Lancar	1.633.765.518	422.831.115	1.210.934.403
Diragukan	3.483.833.821	921.342.208	2.562.491.613
Macet	35.313.732.625	35.313.732.625	-
Jumlah Piutang Pinjaman	**40.820.322.750**	**36.675.501.169**	**4.144.821.581**

	31 Desember 2023		
	Saldo Piutang	**Penyisihan Penurunan Nilai Piutang Pinjaman**	**Saldo Piutang - Neto**
Lancar	3.452.460.063	181.806.63	3.270.653.424
Kurang lancar	7.303.272.049	1.845.261.632	5.458.010.417
Diragukan	4.950.359.453	1.250.769.286	3.699.590.167
Macet	33.616.019.533	33.616.019.533	-
Jumlah Piutang Pinjaman	**49.322.111.098**	**36.893.857.090**	**12.428.254.008**

c. Perubahan Penyisihan Penurunan Nilai Piutang Pinjaman

Perubahan penyisihan penurunan nilai piutang pinjaman kepada mitra binaan pada tahun yang berakhir pada tanggal-tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut:

	31 Desember 2024	**31 Desember 2023**
Saldo awal tahun	36.893.857.090	33.795.371.727
(Pembalikan)/Beban cadangan penyisihan kerugian		
Penurunan nilai piutang pinjaman selama tahun berjalan	(218.355.921)	3.098.485.363
Saldo akhir tahun	**36.675.501.169**	**36.893.857.090**

Manajemen berkeyakinan bahwa penyisihan penurunan nilai piutang yang telah dibentuk telah memadai untuk menutupi kemungkinan kerugian atas tidak tertagihnya piutang pinjaman mitra binaan.

d. Rincian Piutang Pinjaman Mitra Binaan Berdasarkan Sektor Ekonomi

	31 Desember 2024	**31 Desember 2023**
Perdagangan	23.018.799.642	30.613.297.342
Jasa	5.205.772.661	6.898.450.548
Peternakan	3.857.289.615	4.100.803.786
Pertanian	3.407.007.234	3.487.030.236
Industri	3.039.535.211	1.769.186.924

5. PIUTANG PINJAMAN MITRA BINAAN (lanjutan)

d. Rincian Piutang Pinjaman Mitra Binaan Berdasarkan Sektor Ekonomi (lanjutan)

	31 Desember 2024	31 Desember 2023
Perikanan	834.495.525	947.865.230
Industri Kreatif	91.976.063	95.368.257
Perkebunan	265.287.847	309.949.822
Usaha Lainnya	1.100.158.952	1.100.158.953
Jumlah Piutang Pinjaman	**40.820.322.750**	**49.322.111.098**
Dikurangi penyisihan penurunan nilai piutang pinjaman	(36.675.501.169)	(36.893.857.090)
	4.144.821.581	**12.428.254.008**
Piutang pendapatan jasa administrasi	48.783.200	123.380.251
Neto	**4.193.604.781**	**12.551.634.259**

6. PIUTANG KERJASAMA PUMK MITRA BINAAN

a. Piutang kerjasama PUMK kepada mitra binaan merupakan penyaluran PUMK kepada Mitra Binaan yang dilakukan melalui PT Bank Rakyat Indonesia (Persero) Tbk sesuai dengan Perjanjan Kerjasama No. 03/PKS/SMBDX/2023 pada tanggal 13 Oktober 2023. PT Bank Tabungan Negara (Persero) Tbk bekerjasama dengan PT Bank Rakyat Indonesia (Persero) Tbk dalam rangka pelaksanaan penyaluran program PUMK dengan jangka waktu perjanjian kerjasama selama 5 (lima) tahun. Pada saat perjanjian kerjasama telah selesai dilakukan, PT Bank Rakyat Indonesia (Persero) Tbk akan mengembalikan dana program PUMK yang dikerjasamakan secara bertahap kepada PT Bank Tabungan Negara (Persero) Tbk.

b. Rincian Piutang Kerjasama Mitra Binaan Berdasarkan Sektor Ekonomi

	31 Desember 2024	31 Desember 2023
Perdagangan	5.208.034.422	405.000.000
Jasa	2.170.845.917	281.000.000
Industri	549.553.070	25.000.000
Peternakan	188.193.474	-
Perikanan	186.340.858	-
Pertanian	60.681.610	30.000.000
Usaha Lainnya	5.347.289.633	45.000.000
Jumlah piutang pinjaman	**13.710.938.984**	**786.000.000**
Dikurangi penyisihan penurunan nilai piutang pinjaman	(34.878.957)	-
Neto	**13.676.060.027**	**786.000.000**

c. Mutasi cadangan kerugian penurunan nilai

	2024	2023
Saldo awal	-	-
Pembentukan cadangan kerugian penurunan nilai	34.878.957	-
Saldo akhir	**34.878.957**	**-**

6. PIUTANG KERJASAMA PUMK MITRA BINAAN (lanjutan)

d. Rincian Piutang Kerjasama Mitra Binaan Berdasarkan Wilayah

	31 Desember 2024	31 Desember 2023
Wilayah Jawa Barat	2.583.663.492	-
Wilayah DKI Jakarta dan Banten	-	-
Wilayah Jawa Timur, Bali, NTB dan NTT	1.867.636.532	100.000.000
Wilayah Sumatera	230.000.000	-
Wilayah Kalimantan, Sulawersi, Maluku dan Papua	6.475.955.305	536.000.000
Wilayah D.I Yogyakarta dan Jawa Tengah	2.553.683.655	150.000.000
Jumlah Piutang Pinjaman	**13.710.938.984**	**786.000.000**
Dikurangi penyisihan penurunan nilai piutang pinjaman	(34.878.957)	-
Neto	**13.676.060.027**	**786.000.000**

e. Rincian Piutang Kerjasama Mitra Binaan Berdasarkan Kualitas Pinjaman

	31 Desember 2024		
	Saldo Piutang	Penyisihan Penurunan Nilai Piutang Pinjaman	Saldo Piutang - Neto
Lancar	13.520.127.798	17.518.878	13.502.608.920
Kurang Lancar	176.209.886	17.360.079	158.849.807
Diragukan	14.601.300	-	14.601.300
Macet	-	-	-
Jumlah Piutang Pinjaman	**13.710.938.984**	**34.878.957**	**13.676.060.027**

	31 Desember 2023		
	Saldo Piutang	Penyisihan Penurunan Nilai Piutang Pinjaman	Saldo Piutang - Neto
Kurang Lancar	786.000.000	-	786.000.000
Jumlah Piutang Pinjaman	**786.000.000**	**786.000.000**	**786.000.000**

7. ASET NETO

	31 Desember 2024	31 Desember 2023
Aset Neto Tidak Terikat		
Saldo awal	31.522.194.239	33.627.517.696
Kenaikan (Penurunan) aset neto tidak terikat	1.799.211.873	(2.105.323.457)
Saldo Akhir	**33.321.406.112**	**31.522.194.239**

8. PIUTANG KERJASAMA PUMK KEPADA BRI

Berdasarkan Perjanjan Kerjasama No. 03/PKS/SMBDX/2023 pada tanggal 13 Oktober 2023, PT Bank Tabungan Negara (Persero) Tbk bekerjasama dengan PT Bank Rakyat Indonesia (Persero) Tbk dalam rangka pelaksanaan penyaluran program PUMK dengan jangka waktu perjanjian kerjasama selama 5 (lima) tahun. Pada saat perjanjian kerjasama telah selesai dilakukan, PT Bank Rakyat Indonesia (Persero) Tbk akan mengembalikan dana program PUMK yang dikerjasamakan secara bertahap kepada PT Bank Tabungan Negara (Persero) Tbk. Piutang ini merupakan piutang pihak berelasi (Catatan 11).

	31 Desember 2024	31 Desember 2023
Piutang BUMN Penyaluran BRI	4.289.061.016	7.214.000.000
Piutang Jasa Administrasi BUMN Penyaluran BRI	126.393.224	-
Total	**4.415.454.240**	**7.214.000.000**

Rincian piutang BUMN penyaluran BRI adalah sebagai berikut:

31 Desember 2024					
Saldo awal dana belum tersalurkan	**Tambahan dana dititipkan**	**Penerimaan pokok diterima dari Mitra Binaan**	**Penerimaan pendapatan jasa administrasi diterima dari Mitra Binaan**	**Dana yang dipinjamkan kepada Mitra Binaan**	**Saldo akhir dana diterima yang dititipkan**
7.214.000.000	10.000.000.000	1.924.861.016	126.393.224	(14.849.800.000)	4.415.454.240

31 Desember 2023					
Saldo awal dana belum tersalurkan	**Tambahan dana dititipkan**	**Penerimaan pokok diterima dari Mitra Binaan**	**Penerimaan pendapatan jasa administrasi diterima dari Mitra Binaan**	**Dana yang dipinjamkan kepada Mitra Binaan**	**Saldo akhir dana diterima yang dititipkan**
-	8.000.000.000	-	-	(786.000.000)	7.214.000.000

9. PENDAPATAN JASA ADMINISTRASI PINJAMAN

a. Rincian Pendapatan Jasa Administrasi Berdasarkan Wilayah

	Tahun yang berakhir pada tanggal	
	31 Desember 2024	**31 Desember 2023**
Wilayah Jawa Barat	55.963.900	70.065.047
Wilayah DKI Jakarta dan Banten	1.075.880.797	321.975.748
Wilayah Jawa Timur, Bali, NTB dan NTT	90.650.486	242.550.148
Wilayah Sumatera	40.574.696	113.756.591
Wilayah Kalimantan, Sulawesi, Maluku dan Papua	185.837.468	171.184.235
Wilayah D.I Yogyakarta dan Jawa tengah	53.061.590	146.324.130
Jumlah	**1.501.968.937**	**1.065.855.899**

9. PENDAPATAN JASA ADMINISTRASI PINJAMAN (lanjutan)

b. Rincian Pendapatan Jasa Administrasi Berdasarkan Penyaluran Kerjasama

	Tahun yang berakhir pada tanggal	
	31 Desember 2024	**31 Desember 2023**
Pendapatan jasa administrasi atas pinjaman Mitra Binaan – penyaluran BTN	1.375.575.713	1.065.855.899
Pendapatan jasa administrasi atas pinjaman Mitra Binaan – penyaluran BRI	126.393.224	-
Jumlah	**1.501.968.937**	**1.065.855.899**

10. PENDAPATAN LAIN-LAIN

Pendapatan lain-lain merupakan pendapatan yang berasal dari sumber di luar kegiatan utama Program Pendanaan UMK dan tidak bersifat rutin yakni berupa denda keterlambatan pembayaran angsuran oleh debitur. Pendapatan lain-lain pada tahun yang berakhir pada tanggal-tanggal 31 Desember 2024 dan 2023 adalah masing-masing sebesar Rp113.765.972 dan Rp2.744.099.

11. TRANSAKSI DENGAN PIHAK BERELASI

a. Jenis hubungan dan unsur transaksi dengan pihak berelasi

Pihak berelasi	Jenis hubungan	Unsur transaksi pihak berelasi
PT Bank Tabungan Negara (Persero) Tbk	BUMN Pembina	Penempatan Dana
PT Bank Rakyat Indonesia (Persero) Tbk	Pengendalian melalui Pemerintah Pusat Republik Indonesia	Piutang kepada BUMN Pembina Lain/Lembaga penyalur

	31 Desember 2024	**31 Desember 2023**
Aset		
Kas di bank	11.036.287.064	10.970.559.980
Piutang kerjasama PUMK kepada BRI (Catatan 8)	4.450.333.197	7.214.000.000
Jumlah	**15.486.620.261**	**18.184.559.980**
Persentase jumlah aset di pihak berelasi terhadap jumlah aset	**46,47%**	**57,68%**

	Tahun yang berakhir pada tanggal 31 Desember	
	2024	**2023**
Pendapatan		
Pendapatan jasa administrasi (Catatan 9)	126.393.224	-
	126.393.224	**-**
Persentase jumiah pendapatan kepada pihak berelasi terhadap jumlah pendapatan	**7,82%**	**0%**

11. TRANSAKSI DENGAN PIHAK BERELASI (lanjutan)

a. Jenis hubungan dan unsur transaksi dengan pihak berelasi (lanjutan)

	Tahun yang berakhir pada tanggal 31 Desember	
	2024	**2023**
Beban		
Beban lain-lain (Catatan 6)	34.878.957	-
	34.878.957	**-**
Persentase jumlah beban kepada pihak berelasi terhadap jumlah beban	**-19,00%**	**0%**

12. REKLASIFIKASI AKUN LAPORAN KEUANGAN

Laporan keuangan posisi keuangan tanggal 31 Desember 2023 telah diklasifikasikan ulang sebagai berikut:

	Sebelum Reklasifikasi	Reklasifikasi	Setelah Reklasifikasi
ASET			
ASET LANCAR			
Piutang Pinjaman Mitra Binaan - neto	12.428.254.008	123.380.251	12.551.634.259
Piutang lain-lain	8.000.000.000	(8.000.000.000)	-
Piutang Jasa Administrasi Pinjaman	123.380.251	(123.380.251)	-
ASET TIDAK LANCAR			
Piutang Kerjasama PUMK kepada mitra binaan - neto	-	786.000.000	786.000.000
Piutang Kerjasama PUMK kepada BRI	-	7.214.000.000	7.214.000.000
	20.551.634.259	**-**	**20.551.634.259**

13. PENYELESAIAN LAPORAN KEUANGAN

Laporan keuangan ini diselesaikan dan disetujui untuk diterbitkan oleh pengelola pada tanggal 27 Februari 2025.

LAPORAN TINGKAT KESEHATAN

Peringkat (*rating)* yang disampaikan dalam rangka penilaian tingkat kesehatan adalah pemeringkatan yang dilakukan oleh PT Pemeringkat Efek Indonesia (PEFINDO) yang ditandatangani pada tanggal 13 Februari 2025 dengan hasil sebagai berikut:

a. Peringkat Berdiri Sendiri (*Stand Alone Rating)*: AA-
b. Peringkat Akhir *(Final Rating)*: AAA/*Stable*

Dengan demikian, Tingkat Kesehatan untuk PT Bank Tabungan Negara (Persero) Tbk pada Tahun Buku 2024 adalah Sangat Sehat (AAA) sebagaimana diatur dalam Peraturan Menteri BUMN Nomor PER-2/MBU/03/2023 tanggal 3 Maret 2023 tentang Pedoman Tata Kelola dan Kegiatan Korporasi Signifikan Badan Usaha Milik Negara.

Adapun hasil lengkap pemeringkatan adalah sebagaimana terlampir.

PT BANK TABUNGAN NEGARA (PERSERO) TBK
DIREKSI

NIXON L.P. NAPITUPULU
Direktur Utama

PT Bank Tabungan Negara (Persero) Tbk
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No.RTG-021/PEF-DIR/II/2025

Jakarta, 13 Februari 2025

Perihal : **Penyampaian informasi Peringkat Berdiri Sendiri (*Standalone Rating*) dan Peringkat Akhir (*Final Rating*) PT Bank Tabungan Negara (Persero) Tbk**

Dengan hormat,

Merujuk pada surat PT Bank Tabungan Negara (Persero) Tbk nomor 55/S/DIR/ERMD/XII/2024 tertanggal 12 Desember 2024 kepada PT Pemeringkat Efek Indonesia (PEFINDO) perihal Surat Permohonan Pemeringkatan *Standalone* dan *Final Rating* PT Bank Tabungan Negara (Persero) Tbk, maka bersama surat ini kami sampaikan Peringkat Berdiri Sendiri (*Standalone Rating*) dan Peringkat Akhir (*Final Rating*) sebagai berikut:

Peringkat Berdiri Sendiri (*Standalone Rating*)	Peringkat Akhir (*Final Rating*)	Tingkat Kesehatan
idAA-(sa) ***(Double A; Standalone)*** Obligor dengan peringkat idAA memiliki sedikit perbedaan dengan peringkat tertinggi yang diberikan, dan memiliki kemampuan yang **sangat kuat** untuk memenuhi komitmen keuangan jangka panjangnya dibandingkan terhadap obligor Indonesia lainnya. Tanda kurang (-) menunjukkan bahwa peringkat yang diberikan relatif lemah dan di bawah rata-rata kategori yang bersangkutan Tanda (sa) menunjukkan bahwa peringkat adalah peringkat berdiri sendiri (*standalone rating*).	idAAA/*Stable* ***(Triple A; Stable Outlook)*** Obligor berperingkat idAAA merupakan peringkat tertinggi yang diberikan oleh PEFINDO. Kemampuan obligor untuk memenuhi komitmen keuangan jangka panjangnya, relatif terhadap obligor Indonesia lainnya, adalah **superior**.	**Sangat Sehat** (sesuai Peraturan Menteri Badan Usaha Milik Negara Republik Indonesia Nomor PER-2/MBU/03/2023 pasal 81)

Peringkat ditetapkan berdasarkan data dan informasi dari Perusahaan serta Laporan Keuangan Audit per 31 Desember 2024.

Informasi peringkat yang kami sampaikan di atas adalah untuk kepentingan internal Perusahaan dalam rangka pemenuhan Peraturan Menteri Badan Usaha Milik Negara Republik Indonesia Nomor PER-2/MBU/03/2023, dan tidak untuk digunakan ataupun diberikan kepada pihak lain yang tidak berkaitan dengan kebutuhan tersebut.

Hormat kami,

Irmawati
Direktur Utama

Ignatius Girendroheru
Direktur

"Peringkat yang dimuat dalam dokumen ini adalah pendapat PT Pemeringkat Efek Indonesia (PEFINDO) yang diberikan berdasarkan hasil keputusan Komite Pemeringkatan pada saat tanggal dibuatnya peringkat. Peringkat merupakan opini ke depan mengenai kemampuan pihak yang diperingkat dalam memenuhi kewajiban finansialnya secara penuh dan tepat waktu, berdasarkan asumsi yang dibuat saat peringkat ditetapkan. Peringkat bukan merupakan rekomendasi bagi pemodal untuk mengambil keputusan investasi (baik keputusan untuk membeli, menjual, atau menahan efek utang apapun yang diterbitkan berdasarkan atau berhubungan dengan peringkat atau keputusan investasi lainnya) dan/atau opini atas nilai kewajaran efek utang dan/atau nilai entitas yang diberikan peringkat oleh PEFINDO. Semua data dan informasi yang diperlukan dalam proses pemeringkatan diperoleh dari pihak yang meminta pemeringkatan yang dianggap dapat dipercaya keakuratan dan kebenarannya dan dari sumber lain yang dianggap dapat diandalkan. PEFINDO tidak melakukan audit, uji tuntas, atau verifikasi secara independen dari setiap informasi dan data yang diterima dan digunakan sebagai dasar dalam proses pemeringkatan. PEFINDO tidak bertanggung jawab atas kebenaran, kelengkapan, ketepatan waktu, dan keakuratan informasi dan data yang dimaksud. Keakuratan dan kebenaran informasi dan data menjadi tanggung jawab sepenuhnya dari pihak yang memberikan informasi dan data yang dimaksud. Peringkat bisa berubah di masa depan karena peristiwa yang belum diantisipasi sebelumnya pada saat peringkat diberikan pertama kali. PEFINDO berhak menarik peringkat jika data dan informasi yang diterima tidak memadai dan/atau perusahaan yang diperingkat tidak memenuhi kewajibannya kepada PEFINDO. PEFINDO dan setiap anggota Direksi, Komisaris, Pemegang Saham, serta Karyawannya tidak bertanggung jawab kepada pihak manapun atas segala kerugian, biaya-biaya, dan pengeluaran yang diderita atau timbul sebagai akibat penggunaan isi dan/atau informasi hasil pemeringkatan ini, baik secara langsung maupun tidak langsung. PEFINDO tidak memberikan keterangan atau pendapat bahwa dokumen yang dikeluarkan berdasarkan atau berhubungan dengan hasil pemeringkatan ini dapat dieksekusi atau dilaksanakan sesuai dengan ketentuannya."

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Annual Report