bank victoria

Continuous Transformation with Strong Governance and Excellence Services for Sustainable Growth



2024

Laporan Tahunan dan Keberlanjutan
Annual and Sustainability Report

PT Bank Victoria International Tbk

Sanggahan dan Batasan Tanggung Jawab

Disclaimer and Scope of Responsibilities

Laporan Tahunan 2024 PT Bank Victoria International Tbk (yang selanjutnya disebut Bank Victoria atau Bank) ini disusun untuk memenuhi ketentuan pelaporan hasil kinerja Bank pada periode 1 Januari 2024 sampai dengan 31 Desember 2024 kepada regulator dan pemangku kepentingan. Laporan Tahunan ini antara lain disusun berdasarkan Peraturan Otoritas Jasa Keuangan No. 29/POJK.04/2016 tentang Laporan Tahunan Emiten atau Perusahaan Publik dengan muatan konten sesuai Surat Edaran Otoritas Jasa Keuangan No. 16/SEOJK.04/2021 tentang Bentuk dan Isi Laporan Tahunan Emiten atau Perusahaan Publik.

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

The 2024 Annual Report of PT Bank Victoria International Tbk (hereinafter referred to as Bank Victoria or Bank) was prepared to meet the requirements of reporting the Bank performance results for the period of 1 January 2024 to 31 December 2024 to the regulator and stakeholders. This Annual Report was compiled based on Financial Services Authority Regulation No. 29/POJK.04/2016 on Annual Reports of Issuers or Public Companies with contents in accordance with Financial Services Authority Circular No. 16/SEOJK.04/2021 on the Form and Content of Annual Reports of Issuers or Public Companies.

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

Kesinambungan Tema
Theme Continuity



2024

Laporan Tahunan
dan Keberlanjutan

Annual and
Sustainability Report

Continuous Transformation with Strong Governance and Excellence Services for Sustainable Growth

Bank Victoria berkomitmen untuk terus bertransformasi secara berkelanjutan guna menghadirkan layanan perbankan yang unggul, adaptif, dan relevan dengan kebutuhan zaman. Transformasi dilakukan secara bertahap namun terarah melalui penguatan digitalisasi, inovasi produk dan layanan, serta peningkatan efisiensi operasional. Seluruh langkah ini dijalankan dengan tetap menjaga prinsip kehati-hatian, kepatuhan terhadap regulasi, dan pengelolaan risiko yang menyeluruh.

Lebih lanjut, pertumbuhan yang ingin dicapai Bank bukan hanya bersifat jangka pendek, melainkan mengarah pada keberlanjutan jangka panjang. Hal ini diwujudkan melalui penguatan tata kelola perusahaan dan layanan yang berfokus pada nasabah, yang menjadi fondasi untuk menciptakan nilai tambah bagi seluruh pemangku kepentingan. Sejalan dengan Rencana Aksi Keuangan Berkelanjutan (RAKB), Bank Victoria juga terus meningkatkan kontribusi positif dalam aspek ekonomi, sosial, dan lingkungan sebagai bagian dari tanggung jawab dalam membangun masa depan yang lebih inklusif dan berkelanjutan.

Bank Victoria is committed to continuing to transform in a sustainable manner to provide excellent, adaptive, and relevant banking services to the needs of the times. The transformation is conducted gradually but in a targeted manner through strengthening digitalization, innovating product and services, and increasing operational efficiency. All of these steps are carried out while maintaining prudential principles, compliance with regulations, and comprehensive risk management.

Furthermore, the growth pursued by the Bank is not only short-term, but also leads to long-term sustainability. This is realized through strengthening corporate governance and customer-focused services, which are the foundation for creating added value for all stakeholders. In line with the Sustainable Finance Action Plan (RAKB), Bank Victoria also constantly increases positive contributions in economic, social, and environmental aspects as part of its responsibility in establishing a more inclusive and sustainable future.



2023

MOVING FORWARD TO ACCELERATED GROWTH AND STRONGER GOVERNANCE

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

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

2022

INNOVATION AND GOVERNANCE FOR HIGHER LEVEL OF CONVENIENCE BANKING

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

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

Keunggulan Kompetitif
Competitive Advantages



Memiliki Jaringan Kantor Operasional yang Berfokus pada Penetrasi Pasar

Having Operational Office Network that Focuses on Market Penetration



Inovasi Produk dan Layanan

Product and Service Innovations

Memiliki Tingkat Kecukupan Modal yang Kuat

Having Strong Capital Adequacy



Memiliki Potensi Sinergi dan Saling Menguntungkan dengan Seluruh Grup Usaha

Potential Synergy and Mutual Benefits with All Business Groups

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

Implementing the Good Personal Customer Relation Approach (Relationship Banking)

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

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



Komitmen dan Strategi Keberlanjutan [POJK A.1]

Sustainability Commitment and Strategy



Perjalanan bisnis Bank Victoria sebagai lembaga keuangan selama lebih dari 30 tahun tidak lepas dari kepercayaan para pemangku kepentingan yang berkontribusi terhadap keberlanjutan usaha Bank. Kami meyakini bahwa untuk menciptakan perusahaan yang berkelanjutan secara jangka panjang, tidak hanya menghadirkan produk dan layanan perbankan yang berkualitas, tetapi juga diperlukan perhatian lebih pada aspek sosial dan lingkungan.

Atas dasar tersebut, Bank terus berkomitmen untuk menjadi lembaga keuangan yang memberikan pertumbuhan ekonomi dan bisnis yang berkesinambungan bagi seluruh lapisan masyarakat diantaranya melalui layanan inklusi, memberi dampak positif kepada masyarakat dengan meningkatkan literasi keuangan, memberikan pembiayaan yang bertanggung jawab terhadap lingkungan, menciptakan kondisi kerja terbaik bagi karyawan, serta menerapkan etika bisnis yang baik dengan mematuhi peraturan dan perundang-undangan yang berlaku.

Di samping itu, Bank juga turut serta untuk mewujudkan tujuan pembangunan berkelanjutan/*sustainable development goals* (SDGs), dengan mengimplementasikan prinsip keuangan berkelanjutan dalam kegiatan operasional bank. Langkah nyata dukungan tersebut diwujudkan Bank melalui penyusunan program atau rencana kerja jangka panjang yang termuat dalam Rencana Aksi Keuangan Berkelanjutan (RAKB) yang mengacu pada Peraturan Otoritas Jasa Keuangan No. 51 Tahun 2017 tentang Pembiayaan Berkelanjutan Lembaga Jasa Keuangan, Emiten, dan Perusahaan Publik.

Business journey of Bank Victoria as a financial institution for more than 30 years cannot be separated from the trust of stakeholders who give contribution to the Bank's business sustainability. We believe that to create a long-term sustainable company, it is not only necessary to present quality banking products and services, but also requires more attention to social and environmental aspects.

On such basis, the Bank is constantly committed to becoming a financial institution that provides sustainable economic and business growth for all society levels through inclusive services, providing a positive impact on society by increasing financial literacy, providing environmentally responsible financing, establishing the best working conditions for employees, as well as implementing good business ethics by complying with the applicable laws and regulations.

Furthermore, the Bank also participates in realizing sustainable development goals (SDGs), by implementing sustainable financial principles in the Bank's operational activities. The concrete step of support is realized by the Bank through the preparation of a long-term program or work plan set out in the Sustainable Finance Action Plan (RAKB) which refers to the Financial Services Authority Regulation No. 51 of 2017 on Sustainable Financing of Financial Services Institutions, Issuers, and Public Companies.

Secara umum, RAKB memuat strategi utama Bank dalam mendukung penerapan keuangan berkelanjutan di Indonesia, yaitu penguatan struktur organisasi yang berbasis kinerja serta penyesuaian sumber daya manusia dengan kebutuhan strategis, integrasi aspek sosial dan lingkungan hidup ke dalam pengelolaan risiko serta peningkatan pertumbuhan portofolio pembiayaan pada kegiatan usaha berwawasan lingkungan. Dengan demikian, RAKB menjadi sebuah pedoman dalam penerapan keuangan berkelanjutan di Bank Victoria agar berjalan secara terarah dan terukur, sesuai dengan target yang telah direncanakan. Bank Victoria telah menyusun RAKB tahun 2024-2028 yang telah disampaikan kepada Otoritas Jasa Keuangan berdasarkan Surat No. 036/DIR-EKS/11/23 tanggal 29 November 2023.

Prioritas Penerapan Keuangan Berkelanjutan

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

1. **Pengembangan Kapasitas Internal Bank**

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

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

2. **Penyesuaian Peraturan Internal Bank**

   Bank akan melakukan penyesuaian peraturan internal mencakup kebijakan serta prosedur terkait praktik operasional perbankan yang ramah lingkungan dan sesuai dengan prinsip keuangan berkelanjutan. Adapun pelaksanaannya akan dilakukan dengan tahapan sebagai berikut:

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

3. **Pengembangan Bisnis yang Mendukung Keuangan Berkelanjutan**

   Dalam rangka mendukung penerapan keuangan berkelanjutan, Bank berkomitmen untuk mendanai proyek bisnis yang ramah lingkungan sebanyak 11% dari kredit yang diberikan untuk sektor industri pengolahan.

In general, RAKB contains the Bank's main strategies in supporting sustainable finance implementation in Indonesia, namely strengthening organizational structure based on performance, adjusting human capital to strategic needs, integrating social and environmental aspects into risk management, and increasing financing portfolio growth in environmentally friendly business activities. As such, RAKB becomes a guideline for implementing sustainable finance at Bank Victoria so that it runs in a directed and measurable manner, according to the planned targets. Bank Victoria has prepared the 2024-2028 RAKB which has been submitted to the Financial Services Authority based on Letter No. 036/DIR-EKS/11/23 dated 29 November 2023.

Priority of Sustainable Finance Implementation

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

1. **Bank's Internal Capacity Development**

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

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

2. **Adjustment to the Bank's Internal Regulations**

   The Bank will adjust internal regulations including policies and procedures related to environmentally-friendly banking operational practices, in line with the sustainable finance principles. The implementation will be executed in the following stages:

3. **Business Development that Supports Sustainable Finance**

   To support the implementation of sustainable finance, the Bank is committed to funding environmentally friendly business projects by 11% of the credit provided to the processing industry sector.

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

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

RAKB Bank Victoria Tahun 2024-2028

Bank Victoria telah menyusun aksi keberlanjutan yang akan dilaksanakan berdasarkan prioritas keuangan berkelanjutan yang dimiliki. Periode pelaksanaannya dimulai sejak tahun 2024 hingga tahun 2028 dengan berbagai program yang ditunjukkan sebagai berikut:

Bank Victoria's RAKB 2024-2028

Bank Victoria has formulated sustainable actions to be implemented based on sustainable finance priorities. The implementation period starts from 2024 to 2028 with various programs as shown below:

Program Pertama: Pengembangan Kapasitas Internal Bank

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

First Program: Bank's Internal Capacity Development

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

Uraian Kegiatan Description of Activities	**Indikator Keberhasilan** Indicator of Success	**Target**					**Penanggung Jawab** Person in Charge	**Target SDGs** SDGs Target
		2024	**2025**	**2026**	**2027**	**2028**		
Training of trainers.	Menjadi bagian dari *Training* Perihal Keuangan Berkelanjutan. Becoming part of the Sustainable Finance Training.							
Pelatihan terkait penerapan prinsip keuangan berkelanjutan untuk pihak internal. Training related to the application of sustainable finance principles for internal parties.	• Pengurangan penggunaan botol minum plastik. • Penghematan energi. • Pelaksanaan pelatihan keuangan berkelanjutan. • Reduction in the usage of plastic drinking bottles. • Energy savings. • The organization of training in sustainable finance.	**100%**	100%	100%	100%	100%	*Human Capital Management & General Affair*	4 QUALITY EDUCATION
Pelatihan untuk pihak eksternal yang bekerja sama dengan Divisi Bisnis. Training for external parties cooperating with the Business Division.	Pembinaan bagi debitur atau calon debitur terkait keuangan berkelanjutan. Development activities for debtors or potential debtors related to sustainable finance.	**100%**	100%	100%	100%	100%	*Human Capital Management* & Divisi Bisnis / Business Division	
Penyesuaian uraian tugas terkait keuangan berkelanjutan. Adjustments to the description of duties related to sustainable finance.	Penyusunan *key performance indicator* (KPI) serta uraian tugas dan tanggung jawab yang jelas. Preparing key performance indicators (KPIs) and clear description of duties and responsibilities.	**100%**	100%	100%	100%	100%	*Human Capital Management*	-
Tantangan [POJK E.5] **Challenges**	Program ini melibatkan berbagai pihak sehingga sulit untuk mengatur waktu pelatihan dari setiap Divisi. This program involves various parties, making it challenging to coordinate training schedules across Divisions.							
Strategi/Rencana ke Depan **Future Strategies/Plans**	Mengadakan pelatihan dalam beberapa *batch* sehingga memungkinkan para pemangku kepentingan dapat mengikuti kegiatan pelatihan. Hold training in several batches to enable stakeholders to participate in training activities.							

Program Kedua: Penyesuaian Peraturan Internal Bank

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

Second Program: Adjustment to the Bank's Internal Regulations

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

Uraian Kegiatan Description of Activities	Indikator Keberhasilan Indicator of Success	Target					Penanggung Jawab Person in Charge	Target SDGs SDGs Target
		2024	2025	2026	2027	2028		
Penyesuaian kebijakan dan/atau SOP yang terkait keuangan berkelanjutan. Adjustments to policies and/or SOP related to sustainable finance.	Penyesuaian kebijakan dan/atau SOP yang terkait dengan keuangan berkelanjutan dengan rencana kerja 5 tahunan Bank. Adjustments to policies and/or SOP concerning sustainable finance to the Bank's 5-year work plan.	**100%**	100%	100%	100%	100%	*Compliance, System Procedure & Customer Protection* dan Unit Terkait / and Related Unit	-
Tantangan [POJK E.5] **Challenges**	Keterbatasan waktu yang tersedia untuk menyesuaikan peraturan internal dengan prinsip-prinsip keuangan berkelanjutan. Limited time available to adjust the internal regulations to sustainable finance principles.							
Strategi/Rencana ke Depan **Future Strategies/Plans**	Menetapkan *timeline* program serta melibatkan para pemangku kepentingan dalam proses penentuan dan penyesuaian peraturan internal. Determining the program timeline and involving stakeholders in the process of determining and adjusting internal regulations.							

Program Ketiga: Pengembangan Bisnis yang Mendukung Keuangan Berkelanjutan

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

Third Program: Business Development that Supports Sustainable Finance

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

Uraian Kegiatan Description of Activities	Indikator Keberhasilan Indicator of Success	Target					Penanggung Jawab Person in Charge	Target SDGs SDGs Target
		2024	2025	2026	2027	2028		
Pembiayaan pada industri manufaktur. Financing for manufacturing industry.	Dilakukan Perubahan Uraian Kegiatan. Changes to the Description of Activity.							
Pembiayaan terhadap Usaha yang mendukung keuangan berkelanjutan. Financing for Businesses that support sustainable finance.	Pembiayaan kepada debitur yang memenuhi kriteria kegiatan usaha berkelanjutan sesuai dengan SDGs. Financing to debtors who meet the criteria for sustainable business activities in accordance with the SDGs.	**+ 50 Miliar Billion**	+ 75 Miliar Billion	+ 75 Miliar Billion	+ 75 Miliar Billion	+ 75 Miliar Billion	SME I & *Consumer Banking*, dan / and *Commercial Banking*.	

Uraian Kegiatan Description of Activities	Indikator Keberhasilan Indicator of Success	Target					Penanggung Jawab Person in Charge	Target SDGs SDGs Target
		2024	2025	2026	2027	2028		
Tantangan [POJK E.5] **Challenges**	Terbatasnya waktu untuk melakukan pengembangan bisnis melalui penyediaan layanan perbankan kepada debitur yang berwawasan lingkungan. Limited time to carry out business development through the provision of banking services to the environmentally sound debtors.							
Strategi/Rencana ke Depan **Future Strategies/Plans**	Melakukan upaya pemetaan pembiayaan yang didukung kebijakan terkait keuangan berkelanjutan. Conduct financing mapping efforts supported by policies on sustainable finance.							

Program Keempat: Kegiatan Pendukung Keuangan Berkelanjutan

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

Fourth Program: Sustainable Finance Support Activities

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

Uraian Kegiatan Description of Activities	Indikator Keberhasilan Indicator of Success	Target					Penanggung Jawab Person in Charge	Target SDGs SDGs Target
		2024	2025	2026	2027	2028		
Program CSR. CSR Program.	CSR berkelanjutan di bidang kesehatan, pendidikan, dan sosial kemasyarakatan. Sustainable CSR in health, education, and social community.	**100%**	100%	100%	100%	100%	*Human Capital Management & Corporate Secretary*	
Kebijakan penghematan kertas. Policies for paper saving.	Penghematan kertas dengan penggunaan surat elektronik. Paper saving by using electronic mails.	**20%**	22%	22%	22%	22%	*General Affair*	
Tantangan [POJK E.5] **Challenges**	Terbatasnya aktivitas pelaksanaan program CSR akibat adanya pandemi Covid-19, sehingga mempersulit pengukuran dampak kegiatan bagi masyarakat. Limited CSR program implementation activities due to the Covid-19 pandemic, making it difficult to measure the impact of activities on society.							
Strategi/Rencana ke Depan **Future Strategies/Plans**	Melakukan pengukuran melalui survei lapangan atau memanfaatkan data yang dikeluarkan instansi lain yang terkait. Measure by conducting field surveys or utilizing data issued by other relevant agencies.							

Penentuan Isi dan Topik Material Laporan Keberlanjutan

Determining Contents and Material Topics of the Sustainability Report

Pelibatan Pemangku Kepentingan [POJK E.4]

Bank Victoria mengidentifikasi pemangku kepentingan sebagai individu atau entitas yang memiliki kepentingan dan pengaruh signifikan terhadap Bank dalam menerapkan praktik-praktik keberlanjutan. Oleh karena itu, Bank terus berupaya untuk membangun hubungan yang harmonis dengan para pemangku kepentingan yang dilakukan antara lain, melalui berbagai forum pertemuan yang digelar, baik secara berkala maupun insidental sesuai dengan kebutuhan Bank atau atas permintaan pemangku kepentingan. Berdasarkan pemetaan yang dilakukan Bank, berikut pemangku kepentingan dan metode pelibatan yang dilakukan selama tahun pelaporan:

Stakeholders Engagement [POJK E.4]

Bank Victoria identifies stakeholders as individuals or entities that have significant interests and influence on the Bank in implementing sustainability practices. Therefore, the Bank strives to build harmonious relationships with stakeholders by holding various meeting forums, both periodically and incidentally, according to the Bank's needs or at the request of stakeholders. Based on the mapping conducted by the Bank, the following are stakeholders and engagement methods carried out during the reporting year:

Kelompok Pemangku Kepentingan Stakeholders Group	Kebutuhan Pemangku Kepentingan Stakeholders Needs	Respon Terhadap Kebutuhan Pemangku Kepentingan Respond to Stakeholders Needs	Metode Pelibatan Engagement Methods	Frekuensi Pelaksanaan Implementation Frequency
Nasabah	• Kualitas produk dan jasa perbankan. • Keamanan transaksi perbankan mencakup dana dan informasi nasabah. • Informasi yang jelas dan transparan. • *Reward* bagi nasabah.	• Mengembangkan produk dan jasa Bank. • Meningkatkan keandalan teknologi informasi yang digunakan. • Memastikan keamanan produk dan jasa yang diberikan. • Mengadakan program undian berhadiah.	• Pelaksanaan *customer gathering*. • Pelaksanaan survei kepuasan nasabah. • Penyediaan sarana pengaduan bagi nasabah.	Sepanjang tahun atau sesuai kebutuhan.
Customers	• Quality of banking products and services. • Security of banking transactions including the customer's funds and information. • Clear and transparent information. • Reward for customers.	• Developing the Bank's products and services. • Improving the reliability of the information technology used. • Ensuring the safety the products and services provided. • Organizing a lucky draw program.	• Organizing customer gathering event. • Conducting customer satisfaction survey. • Providing complaint channel for customers.	All year round or as needed.
Karyawan	• Pemenuhan hak ketenagakerjaan. • Pemenuhan aspek kesehatan dan keselamatan kerja (K3). • Pengembangan kompetensi dan karier. • Kepuasan kerja.	• Memenuhi kontrak kerja dan perjanjian kerja bersama. • Memastikan kecukupan sarana dan prasarana K3, termasuk upaya pencegahan penyebaran virus Covid-19 di lingkungan kerja. • Melaksanakan pengembangan kompetensi, penilaian kinerja, dan pengembangan karier. • Menyampaikan kebijakan terbaru Bank kepada seluruh karyawan. • Menyelenggarakan program beasiswa bagi anak karyawan.	• Penyelenggaraan *gathering* karyawan dan *focus group discussion* (FGD). • Penyediaan *whistleblowing system* (WBS) untuk melaporkan pelanggaran praktik ketenagakerjaan di lingkungan Bank. • Pelaksanaan berbagai kegiatan pendidikan dan pelatihan, serta promosi atau mutasi. • Pelaksanaan survei kepuasan karyawan.	Sepanjang tahun atau sesuai rencana pelaksanaan program.
Employee	• Fulfillment of employees' rights. • Fulfillment of occupational health and safety (OHS) aspect. • Competency and career development. • Job satisfaction.	• Fulfilling work contracts and collective labor agreements. • Ensuring the adequacy of OHS facilities and infrastructures, including the measures to prevent Covid-19 outbreak in the work environment.	• Organizing employee gathering and focus group discussion (FGD). • Provision of a whistleblowing system (WBS) to report violations of labor practice within the Bank.	All year round or according to the program implementation plan.

Kelompok Pemangku Kepentingan Stakeholders Group	Kebutuhan Pemangku Kepentingan Stakeholders Needs	Respon Terhadap Kebutuhan Pemangku Kepentingan Respond to Stakeholders Needs	Metode Pelibatan Engagement Methods	Frekuensi Pelaksanaan Implementation Frequency
		• Conducting competency development, performance assessment, and career development. • Delivering the latest Bank policies to all employees. • Providing scholarships for employees' children.	• Implementation of various educational and training activities, as well as promotions or transfers. • Implementation of employee satisfaction survey.	
Pemerintah dan Regulator	• Kepatuhan terhadap peraturan yang berlaku. • Pemenuhan kewajiban perpajakan.	• Memastikan pemenuhan seluruh peraturan yang berlaku bagi Bank. • Meningkatkan kualitas pelaksanaan tata kelola perusahaan (GCG). • Membayar pajak dan penerimaan negara bukan pajak (PNBP).	• Penyampaian Laporan Tahunan, Laporan Keberlanjutan, Laporan GCG, dan laporan lainnya. • Pembayaran dan pelaporan pajak dan PNBP.	Sesuai waktu yang ditentukan, sesuai kebutuhan, atau setiap tahun.
Government and Regulator	• Compliance with the applicable regulations. • Fulfillment of taxation obligations.	• Ensuring compliance with all regulations applicable to the Bank. • Improving the quality of corporate governance (GCG) implementation. • Paying taxes and non-tax state revenue (PNBP).	• Submission of Annual Report, Sustainability Report, GCG Report, and other reports. • Payment and reporting of taxes and PNBP.	According to the time set, needs, or annually.
Pemegang Saham dan Investor	• Kinerja keuangan dan non-keuangan. • Keberlanjutan usaha. • Informasi yang jelas dan terkini terkait arah strategis Bank.	• Menyusun Rencana Bisnis Bank (RBB) dan RAKB. • Menjaga kinerja Bank tetap optimal dan sesuai target, dengan memperhatikan aspek ekonomi, sosial, dan lingkungan. • Menyampaikan informasi mutakhir secara transparan.	• Pelaksanaan Rapat Umum Pemegang Saham (RUPS). • Penyampaian Laporan Tahunan dan Laporan Keberlanjutan. • Akses informasi dalam situs web Bank.	Sesuai waktu yang ditentukan, sesuai kebutuhan, atau setiap tahun.
Shareholders and Investors	• Financial and non-financial performance. • Business sustainability. • Clear and updated information related to the Bank's strategic direction.	• Preparing the Bank's Business Plan (RBB) and RAKB. • Maintaining the Bank's performance to keep optimal and on target, by considering the economic, social, and environmental aspects. • Delivering the latest information transparently.	• Convention of the General Meeting of Shareholders (GMS). • Submission of Annual Report and Sustainability Report. • Access to information on the Bank's website.	According to the time set, needs, or annually.
Mitra Usaha	• Pemenuhan kontrak kerja. • Kepuasan kerja sama.	• Melakukan kerja sama yang adil dan transparan sesuai dengan peraturan dan kontrak kerja yang berlaku. • Membangun hubungan kerja yang harmonis dengan mitra usaha.	• Perumusan kontrak kerja sama. • Pelaksanaan pertemuan berkala.	Sepanjang tahun atau sesuai kebutuhan.
Business Partners	• Fulfillment of work contracts. • Cooperation satisfaction.	• Conducting fair and transparent cooperation in accordance with the applicable regulations and work contracts. • Building harmonious working relationship with business partners.	• Formulation of cooperation contract. • Organizing regular meetings.	All year round or as needed.

Kelompok Pemangku Kepentingan Stakeholders Group	Kebutuhan Pemangku Kepentingan Stakeholders Needs	Respon Terhadap Kebutuhan Pemangku Kepentingan Respond to Stakeholders Needs	Metode Pelibatan Engagement Methods	Frekuensi Pelaksanaan Implementation Frequency
Masyarakat	• Informasi aktivitas dan perkembangan usaha Bank. • Peningkatan kesejahteraan masyarakat.	• Melibatkan masyarakat dalam program kemitraan dan aksi sosial Bank. • Memberikan kesempatan kerja. • Menyampaikan informasi mutakhir dalam media sosial Bank.	• Pelaksanaan berbagai program pengembangan masyarakat dan kemitraan. • Penyediaan sarana pengaduan bagi masyarakat. • Penyediaan akses informasi dalam media sosial Bank.	Sesuai rencana pelaksanaan atau sesuai kebutuhan.
Community	• Information on the Bank's business activities and development. • Improvement of public health.	• Engaging the community in partnership program and the Bank's social acts. • Providing job opportunities. • Delivering latest information on the Bank's social media.	• Conducting various community and partnership development programs. • Providing complaint channel for communities. • Providing access to information on the Bank's social media.	According to the implementation plan or as necessary.
Media	• Kinerja keuangan dan non-keuangan Bank. • Informasi terkait perkembangan Bank.	Menyediakan informasi secara transparan dan relevan melalui media sosial Bank.	• Pelaksanaan paparan publik dan media *gathering*. • Pemutakhiran informasi pada media sosial Bank.	Sesuai kebutuhan.
	• The Bank's financial and non-financial performance. • Information related to the Bank's development.	Providing information transparently and relevantly through the Bank's social media.	• Conducting public expose and organizing media gathering. • Updating information on the Bank's social media.	As necessary.

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Kilas Kinerja
Performance Highlights



Pencapaian Tahun 2024
Achievements in 2024

Dana Pihak Ketiga
Third-Party Funds

4.03%

2024	Rp23.33
2023	Rp22.43

triliun / trillion

Pinjaman yang Diberikan - Bersih
Loans - Net

11.43%

2024	Rp20.11
2023	Rp18.05

triliun / trillion

Pendapatan Bunga
Interest Income

13.06%

2024	Rp2.08
2023	Rp1.84

triliun / trillion

Ikhtisar Kinerja Keberlanjutan
Sustainability Performance Highlights

Keberlanjutan Kinerja Ekonomi [POJK B.1]
Economic Performance Sustainability

Kinerja Keuangan
Financial Performance

(dalam juta Rupiah / in million Rupiah)

Uraian	2024	2023	2022	Description
Laporan Posisi Keuangan Konsolidasian* **Consolidated Statements of Financial Position***				
Total Aset	**31,045,989**	**29,624,240**	**25,932,001**	**Total Assets**
Total Aset Keuangan	**30,096,308**	28,453,735	24,310,285	Total Financial Assets
Total Aset Non-Keuangan	**949,681**	1,170,505	1,621,716	Total Non-Financial Assets
Total Liabilitas	**27,112,530**	**25,799,455**	**22,231,538**	**Total Liabilities**
Total Liabilitas Keuangan	**27,032,075**	25,730,307	22,160,500	Total Financial Liabilities
Total Liabilitas Non-Keuangan	**80,455**	69,148	71,038	Total Non-Financial Liabilities
Total Ekuitas	**3,933,459**	**3,824,785**	**3,700,463**	**Total Equity**
Laporan Laba Rugi dan Penghasilan Komprehensif Lain Konsolidasian* **Consolidated Statements of Profit or Loss and Other Comprehensive Income***				
Pendapatan Bunga	**2,076,268**	1,836,391	1,705,018	Interest Income
Beban Bunga	**(1,527,667)**	(1,257,662)	(971,638)	Interest Expense
Pendapatan Bunga - Bersih	**548,601**	578,729	733,381	Interest Income – Net
Pendapatan Operasional Lainnya	**365,736**	253,365	380,203	Other Operating Income
Beban Operasional Lainnya	**(621,366)**	(658,023)	(699,517)	Other Operating Expenses
Laba Operasional	**292,970**	174,071	414,066	Profit from Operations
Beban Non-Operasional - Bersih	**(144,310)**	(44,535)	(57,136)	Non-Operating Expense - Net
Laba Sebelum Beban Pajak Penghasilan	**148,660**	129,536	356,931	Profit Before Income Tax Expense
Beban Pajak Penghasilan - Bersih	**(30,801)**	(27,720)	(130,757)	Income Tax Expense - Net
Laba Bersih yang dapat Diatribusikan kepada:	**117,859**	101,816	226,173	Net Income Attributable to:
Pemilik Entitas Induk	**117,859**	101,816	226,173	Equity Holders of the Parent Entity
Kepentingan Non-Pengendali	**-**	-	-	Non-Controlling Interest
Penghasilan (Rugi) Komprehensif Lain, Setelah Pajak Penghasilan	**(83,091)**	24,405	(70,239)	Other Comprehensive Income (Loss), Net of Income Tax
Penghasilan (Rugi) Komprehensif yang dapat Diatribusikan kepada:	**34,768**	126,222	155,935	Comprehensive Income (Loss) Attributable to:
Pemilik Entitas Induk	**34,768**	126,222	155,935	Equity Holders of the Parent Entity
Kepentingan Non-Pengendali	**-**	-	-	Non-Controlling Interest
Laba Bersih per Saham yang dapat Diatribusikan kepada Pemilik Entitas Induk				Income per Share Attributable to Entity Holders of the Parent Entity
Dasar (Rupiah penuh)	**7.44**	6.42	19.17	Basic (full Rupiah)
Dilusian (Rupiah penuh)	**7.44**	6.42	19.17	Diluted (full Rupiah)

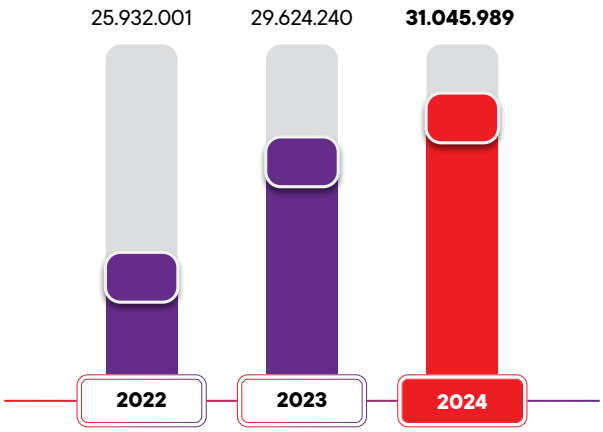
Uraian	2024	2023	2022	Description
Laporan Arus Kas Konsolidasian* **Consolidated Statements of Cash Flows***				
Arus Kas Bersih (Digunakan untuk)/ Diperoleh dari Aktivitas Operasi	**(942,316)**	1,279,308	1,057,052	Cash Flow (Used in)/Provided from Operating Activities
Arus Kas Bersih Digunakan untuk Aktivitas Investasi	**(1,193,957)**	(1,413,275)	(232,938)	Net Cash Flows Used in Investing Activities
Arus Kas Bersih Diperoleh dari Aktivitas Pendanaan	**937,081**	287,343	159,950	Net Cash Flows Provided from Financing Activities
Kas dan Setara Kas pada Akhir Tahun	**1,599,372**	2,798,564	2,645,188	Cash and Cash Equivalents at End of Year
Rasio Keuangan (dalam %)** **Financial Ratios (in %)****				
Permodalan				**Capital**
KPMM dengan Memperhitungkan Risiko Kredit dan Operasional	**22.38**	20.69	22.59	CAR by Calculating Credit and Operational Risk
KPMM dengan Memperhitungkan Risiko Kredit, Operasional, dan Pasar	**21.53**	19.95	21.97	CAR by Calculating Credit, Operational, and Market Risk
Aktiva Tetap Terhadap Modal	**8.86**	11.08	11.60	Fixed Assets to Capital
Aset Produktif				**Earning Assets**
Aset Produktif dan Non-Produktif Bermasalah Terhadap Total Aset Produktif dan Non-Produktif	**3.04**	3.91	5.89	Non-Performing Earning Assets and Non-Earning Assets to Total Earning Assets and Non-Earning Assets
Aset Produktif Bermasalah Terhadap Total Aset Produktif	**2.35**	2.79	3.19	Non-Performing Earning Assets to Total Earning Assets
Cadangan Kerugian Penurunan Nilai (CKPN) Aset Keuangan Terhadap Aset Produktif	**1.57**	2.19	2.49	Allowance for Impairment Losses (CKPN) of Financial Assets to Earning Assets
Pemenuhan CKPN Aset Produktif	**119.37**	165.67	198.55	CKPN Fulfillment of Earning Assets
NPL Bruto	**3.27**	3.99	4.23	Gross NPL
NPL Neto	**2.36**	3.24	3.42	Net NPL
Profitabilitas				**Profitability**
ROA	**0.51**	0.48	1.47	ROA
ROE	**3.41**	3.12	9.48	ROE
NIM	**2.21**	2.58	3.52	NIM
BOPO	**88.00**	91.67	79.44	BOPO
Rasio Laba Terhadap Total Aset	**0.38**	0.34	0.87	Income to Total Assets Ratio
Rasio Laba Terhadap Total Ekuitas	**3.00**	2.66	7.56	Income to Total Equity Ratio
Rasio Laba Terhadap Pendapatan Bunga	**21.48**	17.59	13.27	Income to Interest Income
Rasio Liabilitas Terhadap Total Aset	**87.33**	87.09	85.73	Liabilities to Total Assets Ratio
Rasio Liabilitas Terhadap Total Ekuitas	**689.29**	674.53	743.53	Liabilities to Total Equity Ratio
Likuiditas				**Liquidity**
LDR	**88.12**	83.06	81.69	LDR
LFR	**86.27**	81.93	81.08	LFR
Rasio Aktiva Keuangan Terhadap Liabilitas Keuangan	**114.51**	114.83	98.75	Financial Assets to Financial Liabilities Ratio
Kepatuhan				**Compliance**
Persentase Pelanggaran BMPK				Percentage of LLL Violation
Pihak Terkait	**0.00**	0.00	0.00	Related Parties
Pihak Tidak Terkait	**0.00**	0.00	0.00	Non-Related Parties

Uraian	2024	2023	2022	Description
Persentase Pelampauan BMPK				Percentage of LLL Excess
Pihak Terkait	**0.00**	0.00	0.00	Related Parties
Pihak Tidak Terkait	**0.00**	0.00	0.00	Non-Related Parties
GWM Primer – Rupiah	**6.67**	7.32	7.69	Primary Minimum Reserve Requirements - Rupiah
GWM Primer – Valas	**4.05**	4.05	4.05	Primary Minimum Reserve Requirements – Foreign Exchange
GWM Sekunder – Rupiah	**21.78**	23.73	22.82	Secondary Minimum Reserve Requirements - Rupiah
Posisi Devisa Neto (PDN) secara Keseluruhan	**0.21**	0.39	0.12	Net Open Position (NOP) in Overall

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

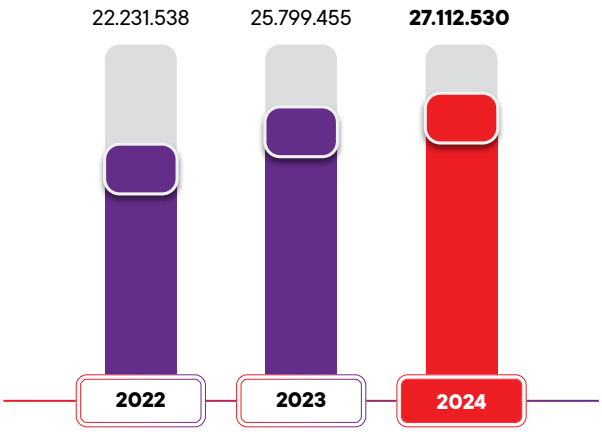
Total Aset
Total Assets

(dalam juta Rupiah / in million Rupiah)



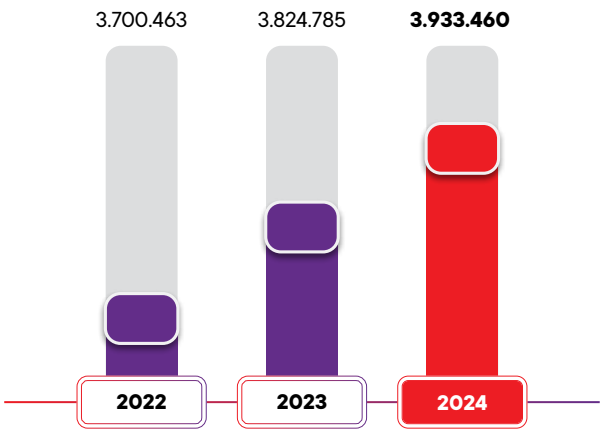
Total Liabilitas
Total Liabilities

(dalam juta Rupiah / in million Rupiah)



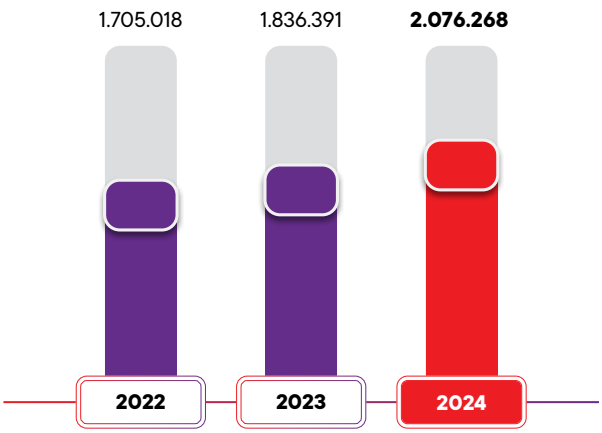
Total Ekuitas
Total Equity

(dalam juta Rupiah / in million Rupiah)



Pendapatan Bunga
Interest Income

(dalam juta Rupiah / in million Rupiah)



Kinerja Operasional
Operational Performance

Uraian	2024	2023	2022	Description
Produk Simpanan (dalam unit rekening)* **Deposit Products (in account unit)***				
Tabungan	**52,529**	41,191	42,100	Saving Deposits
Giro	**3,114**	2,564	2,461	Current Accounts
Deposito Berjangka	**22,759**	18,781	16,947	Time Deposits
Negotiable Certificate Deposits	**181**	150	191	Negotiable Certificate Deposits
Total	**78,583**	**62,686**	**61,699**	**Total**
Produk Pinjaman (dalam juta Rupiah)** **Loan Products (in million Rupiah)****				
Pinjaman Tetap	**10,085,769**	9,697,513	8,860,926	Fixed Loans
Pinjaman Konsumen	**167,347**	164,627	167,465	Consumer Loans
Pinjaman Rekening Koran	**2,122,250**	1,871,767	1,677,755	Overdraft Loans
Pinjaman Tetap dengan Angsuran	**8,110,450**	6,864,293	5,078,177	Fixed Loans with Installments
Pinjaman Serba Guna	**74,045**	30,543	40,288	Multipurpose Loans
Total	**20,559,860**	**18,628,743**	**15,824,611**	**Total**

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

Keberlanjutan Kinerja Sosial [POJK B.3]
Social Performance Sustainability

Uraian	Satuan Unit	2024	2023	2022	Description
Pengelolaan *Human Capital* **Human Capital Management**					
Jumlah Karyawan	Orang People	**746**	713	688	Total Employees
Karyawan Wanita	%	**48.12**	47.55	47.09	Female Employees
Jam Pelatihan/Karyawan	Jam/Orang Hours/People	**5**	5	4	Training Hours/Employee
Karyawan Lokal*	%	**68.36**	67.46	66.86	Local Employees*
Pengembangan Sosial dan Kemasyarakatan **Social and Community Development**					
Penerima Manfaat	Orang People	**1,499**	2,072	2,121	Beneficiaries
Biaya Investasi Sosial	Rupiah	**1,208,651,520**	179,610,888	238,215,664	Social Investment Cost

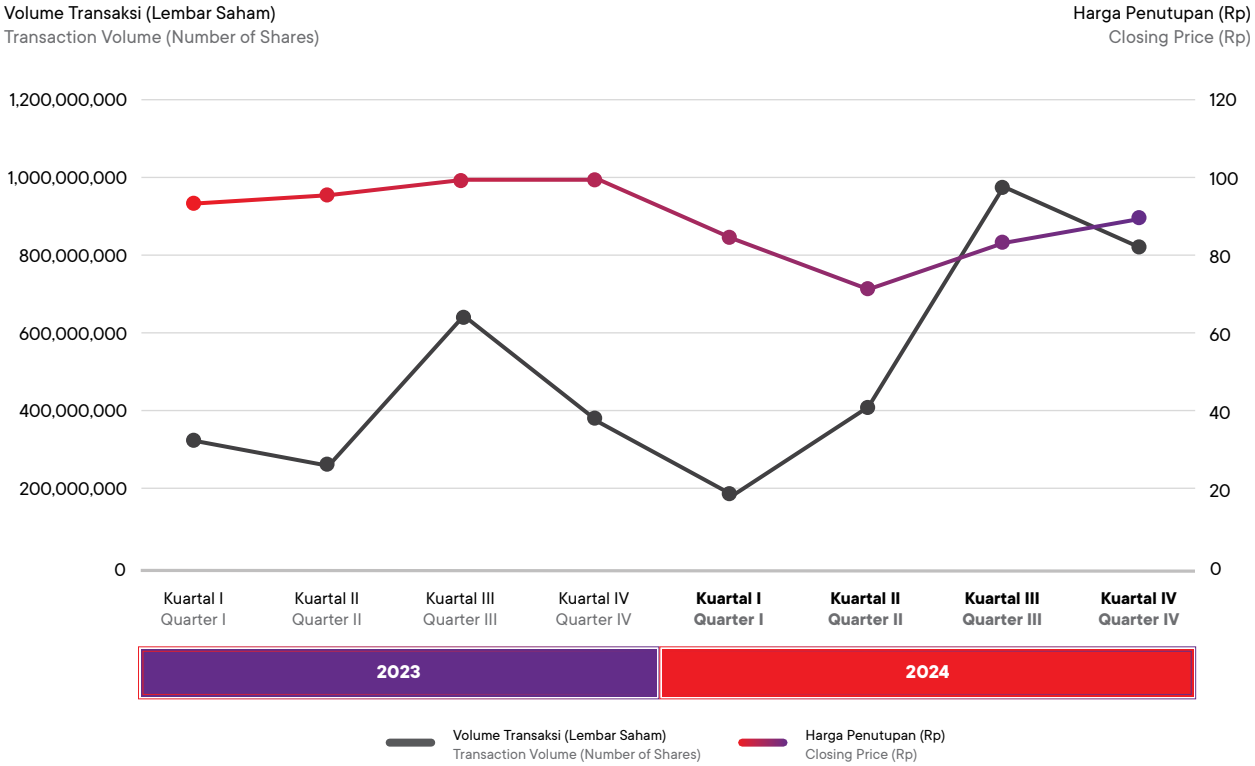
* Karyawan yang memiliki domisili yang sesuai dengan wilayah operasional tempat bekerja. / Employees having domicile in accordance with the operational area where they work.

Keberlanjutan Kinerja Lingkungan Hidup [POJK B.2]
Environmental Performance Sustainability

Uraian	Satuan Unit	2024	2023	2022	Description
Pembiayaan Pertimbangan Aspek Lingkungan	Juta Rupiah Million Rupiah	**601,964**	623,231	794,947	Financing by Considering Environmental Aspect
Debitur yang Memperoleh PROPER	Entitas Entity	**-**	-	-	Debtor Receiving PROPER
Penggunaan Listrik	GJ	**4,914.20**	4,774.83	4,442.55	Use of Electricity
Penggunaan Bahan Bakar Minyak (BBM)	GJ	**2,353.97**	2,262.32	2,879.76	Use of Fuel (BBM)
Penggunaan Air	m^3	**20,080.38**	18,746.74	5,494.06	Water Use
Penggunaan Kertas	Rim Ream	**1,911**	1,935	1,703	Paper Use

Ikhtisar Saham
Share Highlights

Periode Period	Harga Pembukaan Opening Price (Rp)	Harga Terendah Lowest Price (Rp)	Harga Tertinggi Highest Price (Rp)	Harga Penutupan Closing Price (Rp)	Volume Transaksi (Lembar Saham) Transaction Volume (Number of Shares)	Jumlah Saham Beredar (Lembar Saham) Total Outstanding Shares (Number of Shares)	Kapitalisasi Pasar Market Capitalization (Rp)
2024							
Kuartal I Quarter I	**98**	**83**	**98**	**84**	**185,009,540**	**15,848,526,679**	**1,331,276,241,036**
Kuartal II Quarter II	**84**	**50**	**89**	**71**	**409,000,931**	**15,848,527,062**	**1,125,245,421,402**
Kuartal III Quarter III	**72**	**70**	**92**	**83**	**972,724,406**	**15,848,530,226**	**1,315,428,008,758**
Kuartal IV Quarter IV	**84**	**79**	**112**	**89**	**816,757,322**	**15,848,532,906**	**1,410,519,428,634**
2023							
Kuartal I Quarter I	107	85	118	93	323,118,200	15,848,234,714	1,473,885,828,402
Kuartal II Quarter II	88	87	104	95	260,058,800	15,848,234,955	1,505,582,320,725
Kuartal III Quarter III	101	97	135	99	641,361,400	15,848,235,599	1,568,975,324,301
Kuartal IV Quarter IV	105	89	106	99	369,707,600	15,848,235,778	1,568,975,342,022



Aksi Korporasi

Pada tahun 2024, Bank melaksanakan aksi korporasi berupa Pencatatan Penambahan Saham Hasil *Exercise* Waran Seri VII PT Bank Victoria International Tbk dengan jangka waktu pelaksanaan dimulai pada 19 Juni 2023 sampai 18 Desember 2025. Adapun jumlah saham yang telah diterbitkan dan sisa waran per 31 Desember 2024 menjadi sebagai berikut:

Corporate Actions

In 2024, the Bank carried out corporate actions in the form of Additional Shares Listing Resulting from Exercise of Series VII Warrants of PT Bank Victoria International Tbk with an implementation period starting from 19 June 2023 to 18 December 2025. The number of shares issued and remaining warrants as of 31 December 2024 are as follows:

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

Waktu Time	Jumlah Saham Sebelum Penambahan Saham Hasil Exercise Waran Seri VII Number of Shares Before Addition of Shares Resulting from Exercise of Series VII Warrants	Jumlah Penambahan Waran Seri VII Number of Additional Series VII Warrants	Jumlah Saham Setelah Penambahan Saham Hasil Exercise Waran Seri VII Number of Shares After Addition of Shares Resulting from Exercise of Series VII Warrants	Sisa Waran Seri VII Remaining Series VII Warrants
Januari 2024 January 2024	15,848,235,778	**290,899**	15,848,526,677	2,573,378,154
Maret 2024 March 2024	15,848,526,677	**2**	15,848,526,679	2,573,378,152
April 2024	15,848,526,679	**183**	15,848,526,862	2,573,377,969
Juni 2024 June 2024	15,848,526,862	**200**	15,848,527,062	2,573,377,769
Juli 2024 July 2024	15,848,527,062	**1,220**	15,848,528,282	2,573,376,549
Agustus 2024 August 2024	15,848,528,282	**1,002**	15,848,529,284	2,573,375,547
September 2024	15,848,529,284	**942**	15,848,530,226	2,573,374,605
Oktober 2024 October 2024	15,848,530,226	**1,329**	15,848,531,555	2,573,373,276
November 2024	15,848,531,555	**1,143**	15,848,532,698	2,573,372,133
Desember 2024 December 2024	15,848,532,698	**208**	15,848,532,906	2,573,371,925

Selain itu, Bank juga melakukan penawaran umum Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap I Tahun 2024 dan penawaran umum Obligasi Berkelanjutan III Bank Victoria Tahap II Tahun 2024. Penawaran umum Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap I Tahun 2024 dilaksanakan pada Juli 2024 dengan nilai pokok sebesar Rp500.000.000.000,-. Obligasi ini ditawarkan dengan nilai 100% dari nilai pokok obligasi dengan tingkat bunga tetap sebesar 10,75% per tahun dengan jangka waktu 5 (lima) tahun sejak tanggal emisi. Bunga obligasi dibayarkan setiap 3 (tiga) bulan sekali terhitung sejak tanggal emisi pada tanggal pembayaran bunga obligasi pertama kali, yaitu tanggal 12 Oktober 2024, sedangkan pembayaran bunga obligasi terakhir akan dilakukan pada tanggal jatuh tempo yaitu pada tanggal 12 Juli 2029.

Selain itu, penawaran umum Obligasi Berkelanjutan III Bank Victoria Tahap II Tahun 2024 dilaksanakan pada Juli 2024 dengan nilai pokok sebesar Rp500.000.000.000,-. Obligasi ini ditawarkan dengan nilai 100% dari nilai pokok obligasi dengan tingkat bunga tetap sebesar 9,50% per tahun dengan jangka waktu 3 (tiga) tahun sejak tanggal emisi. Bunga obligasi dibayarkan setiap 3 (tiga) bulan sekali terhitung sejak tanggal emisi pada tanggal pembayaran bunga obligasi pertama kali yaitu tanggal 12 Oktober 2024, sedangkan pembayaran bunga obligasi terakhir akan dilakukan pada tanggal jatuh tempo yaitu pada tanggal 12 Juli 2027.

Furthermore, the Bank also carried out public offering of Bank Victoria Sustainable Subordinated Bonds III Phase I Year 2024 and public offering of Bank Victoria Sustainable Subordinated Bonds III Phase II Year 2024. The public offering of Bank Victoria Continuous Subordinated Bonds III Phase I Year 2024 was carried out in July 2024 with a principal value of Rp500,000,000,000. These bonds are offered at a value of 100% of the principal value of bonds with fixed rate of 10.75% per annum with a term of 5 (five) years since emission date. Interest of the bond paid every 3 (three) months starting from emission date, 12 October 2024, for the first payment whereas the last payment will be on 12 July 2029 at the maturity date of the bond.

In addition, the public offering of Bank Victoria Continuing Bonds III Phase II Year 2024 was carried out in July 2024 with a principal value of Rp500,000,000,000. These bonds are offered at a value of 100% of the principal value of bonds with fixed rate of 9.50% per annum with a term of 3 (three) years since emission date. Interest of the bond paid every 3 (three) months starting from emission date, 12 October 2024, for the first payment whereas the last payment will be on 12 July 2027 at the maturity date of the bond.

Aktivitas Perdagangan Saham

Sepanjang tahun 2024, tidak terdapat sanksi terkait aktivitas perdagangan saham, baik berupa penghentian sementara ataupun penghapusan pencatatan saham. Bank senantiasa patuh terhadap ketentuan dan peraturan perundang-undangan yang berlaku di Indonesia, khususnya terkait pasar modal.

Share Trading Activity

Throughout 2024, there were no sanctions related to share trading activities, either in form of temporary suspension on share trading or share delisting. The Bank always complies with the provisions and laws and regulations applicable in Indonesia, particularly regarding capital market.

Ikhtisar Obligasi
Bonds Highlights

Uraian Description	Jumlah (Juta Rupiah) Total (Million Rupiah)	Tenor (Tahun) Tenure (Year)	Tingkat Suku Bunga Interest Rates (%)	Tanggal Dates	Peringkat Ratings		Status Pembayaran Payment Status
					2024	2023	
Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dengan tingkat bunga tetap Bank Victoria Continuous Subordinated Bond I Phase II of 2018 at fixed interest rate	350,000	7	11.00	5 Juni 2018 - 5 Juni 2025 5 June 2018 - 5 June 2025	idBBB (*Triple* B)	idBBB (*Triple* B)	Belum Lunas Not Paid
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 Bank Victoria Continuous Subordination Bonds II Phase I Year 2019	250,000	7	11.75	28 Juni 2019 - 28 Juni 2026 28 June 2019 - 28 June 2026	idBBB (*Triple* B)	idBBB (*Triple* B)	Belum Lunas Not Paid
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019 Bank Victoria Continuous Subordination Bonds II Phase II Year 2019	150,000	7	11.25	8 November 2019 - 8 November 2026	idBBB (*Triple* B)	idBBB (*Triple* B)	Belum Lunas Not Paid
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020 Bank Victoria Continuous Subordination Bonds II Phase III Year 2020	60,000	7	11.25	1 April 2020 - 1 April 2027	idBBB (*Triple* B)	idBBB (*Triple* B)	Belum Lunas Not Paid
Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 dengan tingkat bunga tetap Seri A Bank Victoria Series A Continuing Bonds III Phase I Year 2023 at fixed interest rate	300,000	3	9.25	9 Maret 2023 - 9 Maret 2026 9 March 2023 - 9 March 2026	idA- (*Single* A *Minus*)	idA- (*Single* A *Minus*)	Belum Lunas Not Paid
Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 dengan tingkat bunga tetap Seri B Bank Victoria Series B Continuing Bonds III Phase I Year 2023 at fixed interest rate	200,000	5	10.25	9 Maret 2023 - 9 Maret 2028 9 March 2023- 9 March 2028	idA- (*Single* A *Minus*)	idA- (*Single* A *Minus*)	Belum Lunas Not Paid
Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap I Tahun 2024 Bank Victoria Continuous Subordinated Bonds III Phase I Year 2024	500,000	5	10.75	12 Juli 2024 - 12 Juli 2029 12 July 2024 - 12 July 2029	idBBB (*Triple* B)	-	Belum Lunas Not Paid
Obligasi Berkelanjutan III Bank Victoria Tahap II Tahun 2024 Bank Victoria Continuing Bonds III Phase II Year 2024	500,000	3	9.50	12 Juli 2024 - 12 Juli 2027 12 July 2024 - 12 July 2027	idA- (*Single* A *Minus*)	-	Belum Lunas Not Paid

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

Peristiwa Penting
Significant Events

Januari / January



18

Bank Victoria meraih penghargaan *The Best Indonesia Enterprises Risk Management Award* - VI - 2024 kategori *Bank Public Company Asset* Rp20 Triliun - Rp25 Triliun oleh Economic Review.

Bank Victoria won the Best Indonesia Enterprises Risk Management Award - VI - 2024 in Bank Public Company Asset category of Rp20 Trillion - Rp25 Trillion by Economic Review.

Februari / February



22

Bank Victoria meraih penghargaan *1st Best Indonesia GCG Award-VIII-2024* kategori *Bank Public Company* dalam ajang Indonesia *Good Corporate Governance* (GCG) *Award* 2024 oleh Economic Review.

Bank Victoria won the 1st Best Indonesia GCG Award-VIII-2024 in Bank Public Company category at Indonesia Good Corporate Governance (GCG) Award 2024 by Economic Review.

Maret / March



28

Tim Corporate Secretary dan *Corporate Communication* Bank Victoria meraih penghargaan *The Best Corporate Secretary & Communication Award* 2024 oleh Majalah Economic Review, Ideku Group, dan Indonesia-Asia Institute.

Bank Victoria's Corporate Secretary and Corporate Communication Team won the Best Corporate Secretary & Communication Award 2024 by Economic Review Magazine, Ideku Group, and Indonesia-Asia Institute.

April



1

Bank Victoria meraih penghargaan The 3rd Best Conventional Bank (KBMI 1) kategori Asset Class > Rp25 Triliun pada ajang *13th Infobank Digital Brand Recognition* 2024 yang diselenggarakan oleh Infobank.

Bank Victoria won the 3rd Best Conventional Bank (KBMI 1) award in Asset Class > Rp25 Trillion category at the 13th Infobank Digital Brand Recognition 2024 event organized by Infobank.

April



1

Bank Victoria meraih penghargaan *The 2nd Best Deposit Conventional Bank* (KBMI 1) kategori *Asset Class* > Rp25 Triliun pada ajang *13th Infobank Digital Brand Recognition* 2024 yang diselenggarakan oleh Infobank.

Bank Victoria won the 2nd Best Deposit Conventional Bank (KBMI 1) award for Asset Class > Rp25 Trillion category at the 13th Infobank Digital Brand Recognition 2024 event organized by Infobank.

Mei / May



30

Bank Victoria melaksanakan kegiatan edukasi *digital banking* bertajuk "*Technology Make A Difference*" di Sekolah Menengah Atas Negeri (SMAN) 8 Kota Tangerang Selatan yang diikuti oleh 60 peserta yang berasal dari siswa dan siswi kelas 11.

Bank Victoria held digital banking education activity entitled "Technology Makes A Difference" at State Senior High School (SMAN) 8, South Tangerang City, attended by 60 students of the 11th grade.

Juni / June



14

Bank Victoria melaksanakan Rapat Umum Pemegang Saham Tahunan 2024 di Graha BIP, Jl. Gatot Subroto Kav. 23, Jakarta Selatan 12930.

Bank Victoria held the 2024 Annual General Meeting of Shareholders at Graha BIP, Jl. Gatot Subroto Kav. 23, South Jakarta 12930.

Juli / July



3

Dalam rangka meningkatkan pelayanan kepada nasabah, Bank Victoria melakukan relokasi Kantor Cabang Pembantu (KCP) Senayan City ke KCP Hang Tuah yang beralamat di Jl. Hang Tuah Raya No. 4 Lantai 2, Kel. Gunung, Kec. Kebayoran Baru, Jakarta Selatan 12120.

To improve customer service, Bank Victoria relocated Senayan City Sub-Branch Office (KCP) to KCP Hang Tuah, located at Jl. Hang Tuah Raya No. 4, 2nd Floor, Kel. Gunung, Kec. Kebayoran Baru, South Jakarta 12120.

Juli / July

12

Bank Victoria menerbitkan Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap I Tahun 2024 sebesar Rp500.000.000.000,-.

Bank Victoria issued Bank Victoria Continuous Subordinated Bonds III Phase I Year 2024 amounting to Rp500,000,000,000.

12

Bank Victoria menerbitkan Obligasi Berkelanjutan III Bank Victoria Tahap II Tahun 2024 sebesar Rp500.000.000.000,-.

Bank Victoria issued Bank Victoria Continuing Bonds III Phase II Year 2024 amounting to Rp500,000,000,000.

Agustus / August



1

Bank Victoria meraih penghargaan The *Best Bank Awards* 2024 *for accelerating Prudent and sustainable Business Growth Through Digital-Based Product and Service Innovation* kategori Bank Swasta Kelompok Bank Berdasarkan Modal Inti (KBMI) I oleh Warta Ekonomi.

Bank Victoria won The Best Bank Awards 2024 for accelerating Prudent and sustainable Business Growth Through Digital-Based Product and Service Innovation in Private Bank category of Bank Group Based on Core Capital (KBMI) I by Warta Ekonomi.



12

Bank Victoria meraih penghargaan *The Best Indonesia Finance for Bank Public Company* 2024 kategori Asset Rp20 Triliun - Rp50 Triliun oleh Economic Review.

Bank Victoria won the Best Indonesia Finance for Bank Public Company 2024 award in Asset of Rp20 Trillion - Rp50 Trillion category by the Economic Review.

September



9

Bank Victoria meraih penghargaan *Best Bank Performance of MSMEs Loan Awards* 2024 dengan predikat "Sangat Prima" kategori Modal Inti sampai dengan Rp6 triliun (KBMI 1) Aset Rp25 triliun sampai dengan di bawah Rp30 triliun oleh Majalah Peluang.

Bank Victoria won the Best Bank Performance of MSMEs Loan Awards 2024 with title "Very Excellent" in the Core Capital category of up to Rp6 trillion (KBMI 1), Assets of Rp25 trillion to below Rp30 trillion, by Peluang Magazine.

Oktober / October



7

Bank Victoria merayakan Hari Ulang Tahun Bank Victoria yang ke-30, menandai tiga dekade perjalanan penuh prestasi, tantangan, dan inovasi dalam industri perbankan. Acara perayaan ini dihadiri oleh Jajaran Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali, sebagai bentuk apresiasi atas perjalanan panjang serta komitmen Bank dalam memberikan layanan terbaik bagi nasabah dan pemangku kepentingan.

Bank Victoria celebrated its 30th Anniversary, marking three decades of a journey full of achievements, challenges, and innovations in banking industry. This celebration event was attended by the Board of Commissioners, Board of Directors, and Controlling Shareholders, as form of appreciation for the Bank's long journey and commitment to providing best services for customers and stakeholders.

November



3

Bank Victoria menyelenggarakan acara lari berstandar nasional, yaitu Victoria Run 2024, yang berlangsung di QBIG BSD, Tangerang. Acara ini menjadi bagian dari inisiatif Bank dalam mendukung gaya hidup sehat serta mempererat hubungan dengan masyarakat dan nasabah melalui kegiatan olahraga yang kompetitif dan inspiratif.

Bank Victoria held a national standard running event, namely Victoria Run 2024, which took place at QBIG BSD, Tangerang. This event is part of the Bank's initiatives to support healthy lifestyle and strengthen relationship with the community and customers through competitive and inspiring sports activities.

Penghargaan dan Sertifikasi
Awards and Certifications

Penghargaan
Awards



01



02



03



04



05



06



07



08

1. ***The Best Indonesia Enterprises Risk Management Award - VI - 2024***

   Kategori / Category:
   Bank Public Company Asset Rp20 Triliun - Rp25 Triliun
   Bank Public Company Asset Rp20 Trillion - Rp25 Trillion

   Tanggal / Date:
   18 Januari 2024 / 18 January 2024

   Acara / Event:
   Indonesia Enterprises Risk Management Award - VI - 2024

   Penyelenggara / Organizer:
   Economic Review

   Penerima / Awardee:
   Bank Victoria

2. ***1st Best Indonesia GCG Award-VIII-2024***

   Kategori / Category:
   Bank Public Company Asset Rp20 Triliun - Rp25 Triliun
   Bank Public Company Asset Rp20 Trillion - Rp25 Trillion

   Tanggal / Date:
   22 Februari 2024 / 22 February 2024

   Acara / Event:
   Indonesia Good Corporate Governance (GCG) Award 2024

   Penyelenggara / Organizer:
   Economic Review

   Penerima / Awardee:
   Bank Victoria

3. *The Best Corporate Secretary & Communication Award 2024*

Kategori / Category:
Gold Award - Score: 89.00 – Excellent

Tanggal / Date:
28 Maret 2024 / 28 March 2024

Acara / Event:
Indonesia Corporate Secretary & Communication Award IX 2024

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

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

4. *The 3rd Best Conventional Bank* (KBMI 1)

Kategori / Category:
Asset Class > Rp25 Triliun
Asset Class > Rp25 Trillion

Tanggal / Date:
1 April 2024

Acara / Event:
13th Infobank Digital Brand Recognition 2024

Penyelenggara / Organizer:
Infobank

Penerima / Awardee:
Bank Victoria

5. *The 2nd Best Deposit Conventional Bank* (KBMI 1)

Kategori / Category:
Asset Class > Rp25 Triliun
Asset Class > Rp25 Trillion

Tanggal / Date:
1 April 2024

Acara / Event:
13th Infobank Digital Brand Recognition 2024

Penyelenggara / Organizer:
Infobank

Penerima / Awardee:
Bank Victoria

6. *The Best Bank Awards 2024 for Accelerating Prudent and Sustainable Business Growth Through Digital-Based Product and Service Innovation*

Kategori / Category:
Bank Swasta Kelompok Bank Berdasarkan Modal Inti (KBMI) I / Private Bank of Bank Group Based on Core Capital (KBMI) I

Tanggal / Date:
31 Juli 2024 / 31 July 2024

Acara / Event:
Indonesia Best Bank Awards 2024

Penyelenggara / Organizer:
Warta Ekonomi

Penerima / Awardee:
Bank Victoria

7. *The Best Indonesia Finance for Bank Public Company 2024*

Kategori / Category:
Asset Rp20 Triliun - Rp50 Triliun
Asset Rp20 Trillion - Rp50 Trillion

Tanggal / Date:
12 Agustus 2024 / 12 August 2024

Acara / Event:
Indonesia Finance Award VII 2024

Penyelenggara / Organizer:
Economic Review

Penerima / Awardee:
Bank Victoria

8. *Best Bank Performance of MSMEs Loan Awards 2024* dengan Predikat "Sangat Prima"
Best Bank Performance of MSMEs Loan Awards 2024 with Predicate "Very Excellent"

Kategori / Category:
Modal Inti sampai dengan Rp6 triliun (KBMI 1) Aset Rp25 triliun sampai dengan di bawah Rp30 triliun / Core Capital up to Rp6 trillion (KBMI 1), Assets of Rp25 trillion to below Rp30 trillion

Tanggal / Date:
9 September 2024

Acara / Event:
Best Bank Performance of MSMEs Loans Award 2024

Penyelenggara / Organizer:
Majalah Peluang

Penerima / Awardee:
Bank Victoria



Laporan Manajemen
Management Report





ZAENAL ABIDIN Ph.D

Komisaris Utama Independen
Independent President Commissioner

Laporan Dewan Komisaris

Report of the Board of Commissioners

Pemegang Saham dan Pemangku Kepentingan yang Terhormat,

Dear Honorable Shareholders and Stakeholders,

Tahun 2024 menandai fase transisi yang menantang bagi industri keuangan global, dengan ketidakpastian geopolitik, volatilitas pasar, serta agenda keberlanjutan yang kian mendesak. Di tengah arus tersebut, Indonesia berhasil menjaga stabilitas ekonomi dan memperkuat daya tahan sektor perbankan melalui bauran kebijakan yang responsif dan kolaboratif. Kondisi ini membuka peluang bagi PT Bank Victoria International Tbk untuk mengakselerasi transformasi, memperkuat tata kelola, serta memperluas kontribusi terhadap pertumbuhan ekonomi yang inklusif dan berkelanjutan.

Dari perspektif pengawasan strategis, Dewan Komisaris memandang bahwa arah kebijakan dan kinerja Bank sepanjang tahun tersebut telah sesuai dengan prinsip kehati-hatian, integritas tata kelola, dan tanggung jawab sosial. Penekanan terhadap efisiensi operasional, ketahanan portofolio, serta integrasi aspek lingkungan dan sosial ke dalam strategi bisnis mencerminkan komitmen untuk menciptakan nilai jangka panjang secara berimbang. Laporan ini pun menjadi refleksi atas pelaksanaan fungsi pengawasan yang dijalankan secara objektif dan independen, dalam rangka memastikan kesinambungan pertumbuhan Bank di tengah dinamika yang terus berkembang.

The year 2024 marked a challenging transition phase for the global financial industry, with geopolitical uncertainty, market volatility, and an increasingly pressing sustainability agenda. Amidst these currents, Indonesia managed to maintain the economic stability and strengthen the resilience of banking sector through a responsive and collaborative policy mix. This condition opens up opportunities for PT Bank Victoria International Tbk to accelerate transformation, strengthen governance, and expand contributions to inclusive and sustainable economic growth.

From a strategic supervision perspective, the Board of Commissioners observes that the Bank's policy direction and performance throughout the year are in accordance with prudential principles, governance integrity, and social responsibility. The emphasis on operational efficiency, portfolio resilience, and integration of environmental and social aspects into business strategy reflect the commitment to creating long-term value in a balanced manner. This report also reflects the implementation of supervisory function carried out objectively and independently, in order to ensure the sustainability of the Bank's growth amidst ever-evolving dynamics.

Kondisi Makroekonomi dan Industri Perbankan Tahun 2024

Lanskap perekonomian global tahun 2024 berada dalam konfigurasi yang kompleks dan dinamis. Tiga faktor utama, yaitu eskalasi ketegangan geopolitik, pergantian kepemimpinan politik di berbagai negara, serta melambatnya pertumbuhan ekonomi global menjadi penentu utama arah pergerakan pasar dan sentimen pelaku usaha. Organisation for Economic Co-operation and Development (OECD) mencatat pertumbuhan ekonomi dunia sebesar 3,2%, mencerminkan pemulihan yang tidak merata dan masih rapuh. Namun, di tengah gejolak

Macroeconomic Conditions and Banking Industry in 2024

The global economic landscape in 2024 was in a complex and dynamic configuration. Three main factors, namely escalation of geopolitical tensions, changes in political leadership in various countries, and slowing global economic growth were the primary determinants of the direction of market movements and business sentiment. The Organisation for Economic Co-operation and Development (OECD) recorded world economic growth of 3.2%, reflecting an uneven and still fragile recovery. However, amidst such external turmoil, Indonesia's

eksternal tersebut, perekonomian Indonesia tetap menunjukkan ketahanan yang patut diapresiasi, dengan laju pertumbuhan mencapai 5,02%. Capaian ini ditopang oleh konsumsi domestik yang stabil, sinergi kebijakan fiskal dan moneter yang *prudent*, serta kontribusi positif dari sektor manufaktur dan investasi.

Industri perbankan nasional pun tampil adaptif dan kontributif dalam menjaga stabilitas sistem keuangan. Fungsi intermediasi tetap tumbuh kuat, tercermin dari peningkatan kredit perbankan umum yang tumbuh sebesar 10,39% (yoy). Pertumbuhan ini didorong oleh meningkatnya permintaan kredit dari sektor korporasi dan UMKM, khususnya pada bidang perdagangan serta pertanian. Dari sisi pendanaan, dana pihak ketiga (DPK) tumbuh sebesar 4,48% (yoy), menopang kondisi likuiditas yang tetap sehat dengan rasio aset likuid terhadap *non-core deposit* (AL/NCD) dan aset likuid terhadap dana pihak ketiga (AL/DPK) masing-masing sebesar 112,87% dan 25,59%. Sementara itu, indikator permodalan tetap berada pada tingkat yang solid dengan *capital adequacy ratio* (CAR) sebesar 26,68%, diiringi oleh kualitas aset yang membaik melalui penurunan rasio *non-performing loan* (NPL) *gross* ke 2,08% dan NPL *net* ke 0,74%. Keseluruhan indikator ini merefleksikan kapasitas dan kesiapan industri perbankan untuk terus memainkan peran sentral dalam mendukung pertumbuhan ekonomi nasional secara berkelanjutan, sekaligus memperkuat daya tahannya dalam menghadapi tantangan ke depan.

Pengawasan terhadap Perumusan dan Implementasi Strategi Bank Victoria

Sepanjang tahun 2024, Dewan Komisaris senantiasa memastikan bahwa strategi bisnis yang dijalankan Bank Victoria berada dalam jalur yang selaras dengan rencana arah kebijakan korporasi jangka panjang sebagaimana tertuang dalam Rencana Bisnis Bank (RBB) dan Rencana Aksi Keuangan Berkelanjutan (RAKB). Dalam pelaksanaannya, pengawasan dilakukan secara menyeluruh dan berkesinambungan, baik melalui evaluasi capaian kinerja maupun melalui pembahasan intensif dalam forum rapat bersama Direksi. Pendekatan ini memungkinkan Dewan Komisaris untuk menelaah efektivitas implementasi strategi, mencermati dinamika operasional, serta mengawal agar Bank tetap adaptif terhadap perubahan lingkungan usaha yang cepat dan menantang.

Fungsi pengawasan juga ditopang oleh pemberian arahan dan pertimbangan strategis yang mendalam terhadap aspek-aspek fundamental, seperti kesehatan permodalan, efektivitas manajemen risiko, dan keberlangsungan tata kelola. Dengan penguatan komunikasi antar pemangku kepentingan internal, Dewan Komisaris turut mengarahkan agar pertumbuhan yang dicapai tetap seimbang antara pencapaian target finansial dan kepatuhan terhadap prinsip kehati-hatian. Pengawasan ini diyakini menjadi landasan yang

economy continued to show resilience that deserved appreciation, with a growth rate reaching 5.02%. This achievement was supported by stable domestic consumption, prudent fiscal and monetary policy synergy, and positive contributions from manufacturing and investment sectors.

The national banking industry also appeared adaptive and contributive in maintaining the stability of financial system. Intermediation function continued to grow strongly, reflected in the increase in general banking loans which grew by 10.39% (yoy). This growth was driven by the increasing demand for loans from corporate and MSME sectors, particularly in trade and agriculture sectors. From funding side, third-party funds (DPK) grew by 4.48% (yoy), supporting sound liquidity conditions with the ratio of liquid assets to non-core deposits (AL/NCD) and liquid assets to third-party funds (AL/DPK) of 112.87% and 25.59%, respectively. Meanwhile, capital indicators remained at a solid level with capital adequacy ratio (CAR) of 26.68%, accompanied by improved asset quality through a decrease in gross non-performing loan (NPL) ratio to 2.08% and net NPL to 0.74%. All of these indicators reflected the capacity and readiness of banking industry to continue to play a central role in supporting sustainable national economic growth, while strengthening its resilience in facing future challenges.

Supervision of Bank Victoria's Strategy Formulation and Implementation

Throughout 2024, the Board of Commissioners continued to ensure that business strategy implemented by Bank Victoria was on track with the long-term corporate policy direction plan as stated in the Bank's Business Plan (RBB) and Sustainable Finance Action Plan (RAKB). In its implementation, supervision was carried out comprehensively and continuously, both through evaluation of performance achievements and through intensive discussions in joint meeting forums with the Board of Directors. These approaches allow the Board of Commissioners to review the effectiveness of strategy implementation, observe operational dynamics, and ensure that the Bank remains adaptive to rapid and challenging changes in business environment.

The supervisory function is also supported by providing in-depth strategic direction and considerations on fundamental aspects, such as capital soundness, risk management effectiveness, and governance sustainability. By strengthening communication among internal stakeholders, the Board of Commissioners also directs that the growth achieved remains balanced between achieving financial targets and compliance with the prudential principles. This supervision is believed to be an important basis for Bank Victoria in

penting bagi Bank Victoria dalam menjaga kesinambungan kinerja, meningkatkan daya saing, serta memperkuat posisi strategis di tengah lanskap industri perbankan yang terus berkembang.

Penilaian terhadap Kinerja Direksi mengenai Pengelolaan Bank Victoria

Dewan Komisaris menilai bahwa sepanjang tahun 2024, Direksi Bank Victoria telah menunjukkan kapasitas manajerial yang adaptif dan responsif dalam menghadapi dinamika ekonomi serta kompleksitas industri perbankan. Di tengah ketidakpastian global dan pergeseran perilaku pasar domestik, pengelolaan usaha dilakukan secara terukur dan selaras dengan arah RBB dan RAKB yang telah ditetapkan. Peningkatan total aset menjadi Rp31,05 triliun mencerminkan efektivitas strategi ekspansi yang dijalankan secara konsisten dan berkesinambungan. Di tengah dinamika pasar, pengelolaan sisi liabilitas juga dilakukan secara hati-hati untuk menjaga keseimbangan struktur pendanaan, seiring dengan upaya optimalisasi penghimpunan dana pihak ketiga yang mendukung keberlanjutan intermediasi Bank secara keseluruhan. Seluruh langkah tersebut mendukung terwujudnya stabilitas keuangan yang solid dan sejalan dengan prinsip tata kelola yang berkelanjutan.

Dari sisi profitabilitas, Direksi mampu menjaga kinerja pendapatan yang sehat di tengah tekanan eksternal, termasuk kenaikan suku bunga acuan yang memengaruhi beban dana. Meskipun pendapatan bunga bersih mengalami koreksi sebesar 5,21%, Bank Victoria berhasil mengompensasinya melalui peningkatan signifikan pada pendapatan operasional lainnya sebesar 44,35%, hasil dari penguatan layanan jasa dan efektivitas sinergi digital. Laba bersih yang meningkat menjadi Rp117,86 miliar atau tumbuh 15,76% dibandingkan tahun sebelumnya, mencerminkan hasil dari konsistensi strategi pertumbuhan yang berkualitas, efisiensi operasional, dan ketangguhan dalam menghadapi tekanan pasar. Dewan Komisaris memandang bahwa pencapaian tersebut merupakan indikator keberhasilan Direksi dalam menjaga keseimbangan antara pertumbuhan bisnis dan pengelolaan risiko yang memadai.

Lebih lanjut, Dewan Komisaris mengapresiasi keseriusan Direksi dalam memperkuat peran Bank sebagai institusi keuangan yang inklusif dan berorientasi masa depan. Pelaksanaan RAKB difokuskan pada penguatan kapasitas internal dan penyesuaian peraturan internal sebagai langkah awal menuju transformasi keberlanjutan yang sistematis. Di sisi lain, pengembangan digital juga menunjukkan progres signifikan, mulai dari penyempurnaan layanan internet dan *mobile banking*, penguatan infrastruktur keamanan data, hingga kolaborasi strategis dengan *fintech* dan lembaga keuangan mikro. Integrasi antara digitalisasi dan keberlanjutan tersebut menegaskan

maintaining performance sustainability, increasing competitiveness, and strengthening its strategic position amidst the ever-evolving banking industry landscape.

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

The Board of Commissioners considered that throughout 2024, the Board of Directors of Bank Victoria demonstrated adaptive and responsive managerial capacity in dealing with economic dynamics and complexity of banking industry. Amid global uncertainty and shifts in domestic market behavior, business management was carried out in a measured manner and in line with the direction of the established RBB and RAKB. The increase in total assets to Rp31.05 trillion reflected the effectiveness of expansion strategy that was carried out consistently and sustainably. Amidst these market dynamics, liability management was also carried out carefully to maintain a balanced funding structure, along with efforts to optimize the collection of third-party funds that supported the sustainability of the overall intermediation of the Bank. All of such measures supported the realization of solid financial stability and were in line with the principles of sustainable governance.

From profitability side, the Board of Directors was able to maintain sound income performance amid external pressures, including an increase in benchmark interest rate that affected the cost of funds. Though net interest income experienced a correction of 5.21%, Bank Victoria managed to compensate for it through a significant increase in other operating income of 44.35%, the result of strengthening services and effectiveness of digital synergy. Net profit which increased to Rp117.86 billion or grew by 15.76% compared to that of the previous year, reflected the results of consistent quality growth strategies, operational efficiency, and resilience in facing market pressures. The Board of Commissioners considered these achievements as an indicator of the Board of Directors' success in maintaining the balance between business growth and adequate risk management.

Furthermore, the Board of Commissioners appreciates the Board of Directors' seriousness in strengthening the Bank's role as an inclusive and future-oriented financial institution. The implementation of RAKB is focused on strengthening internal capacity and adjusting internal regulations as an initial step towards a systematic sustainability transformation. On the other hand, digital development has also shown significant progress, starting from improving internet and mobile banking services, strengthening data security infrastructure, to strategic collaboration with fintech and microfinance institutions. The integration between digitalization

komitmen Direksi dalam menciptakan nilai jangka panjang yang selaras dengan prinsip tata kelola yang baik dan tuntutan perubahan zaman. Dalam pandangan Dewan Komisaris, langkah-langkah tersebut telah memperkuat posisi Bank Victoria dalam menghadapi tantangan masa kini sekaligus mempersiapkan diri untuk peluang masa depan yang lebih kompleks dan kompetitif.

and sustainability confirms the Board of Directors' commitment to creating long-term value that is in line with good governance principles and the demands of changing times. In the view of the Board of Commissioners, these steps have strengthened Bank Victoria's position in facing today's challenges while preparing for more complex and competitive future opportunities.

Pandangan atas Prospek Usaha

Pada sudut pandang Dewan Komisaris, prospek usaha Bank Victoria pada tahun 2025 akan bergerak dalam konteks yang menuntut ketajaman adaptasi dan ketepatan arah kebijakan. Ketidakpastian global masih menjadi latar dominan, di tengah koreksi proyeksi pertumbuhan ekonomi dunia yang merefleksikan meningkatnya tekanan geopolitik dan fragmentasi perdagangan. Meski demikian, ketangguhan perekonomian nasional menjadi sinyal positif bahwa ruang pertumbuhan domestik tetap terjaga, sejalan dengan respons kebijakan fiskal dan moneter yang berimbang serta stabilitas sektor riil yang relatif solid. Dalam perspektif ini, sektor perbankan dipandang memiliki peran strategis dalam menjaga kontinuitas pemulihan dan pertumbuhan, dengan tetap mengedepankan prinsip kehati-hatian.

Views on Business Outlook

From the Board of Commissioners' perspective, Bank Victoria's business prospects in 2025 will move in a context that demands sharp adaptation and precise policy direction. Global uncertainty is still the dominant background, amidst the correction of world economic growth projections that reflect increasing geopolitical pressures and trade fragmentation. Nevertheless, the resilience of national economy is a positive signal that domestic growth space is maintained, in line with the balanced fiscal and monetary policy response and the relatively solid stability of real sector. From this perspective, banking sector is seen as having a strategic role in maintaining the continuity of recovery and growth, while still prioritizing prudential principles.

Dengan mempertimbangkan proyeksi pertumbuhan kredit industri yang berada pada kisaran 11–13%, Dewan Komisaris menilai bahwa Bank Victoria memiliki ruang yang memadai untuk melanjutkan akselerasi pertumbuhan secara progresif dan bertanggung jawab. Rencana bisnis serta proyeksi strategis yang diajukan Direksi telah dikaji dan dinilai selaras dengan kondisi eksternal, karakteristik pasar yang dilayani, serta kemampuan internal Perseroan. Dewan Komisaris memandang bahwa arah kebijakan tersebut telah memperhitungkan aspek fundamental yang penting, baik dari sisi manajemen risiko, ketahanan likuiditas, maupun penguatan digitalisasi layanan. Dalam kerangka ini, penguatan sinergi internal dan kepatuhan terhadap ketentuan regulator nasional tetap menjadi perhatian utama, agar Bank Victoria senantiasa relevan dan tangguh dalam menjawab kebutuhan ekonomi yang terus berkembang.

Considering the projection of industrial loan growth in the range of 11-13%, the Board of Commissioners considers that Bank Victoria has adequate space to continue accelerating growth progressively and responsibly. Business plan and strategic projections submitted by the Board of Directors have been reviewed and evaluated in line with external conditions, characteristics of markets served, and the Company's internal capabilities. The Board of Commissioners views that the policy direction has considered important fundamental aspects, including in terms of risk management, liquidity resilience, and strengthening service digitalization. Within this framework, strengthening internal synergy and compliance with national regulatory requirements remain the main concerns, enabling Bank Victoria remains relevant and resilient in addressing to the needs of the ever-growing economy.

Pandangan atas Penerapan Tata Kelola Perusahaan yang Baik

Dewan Komisaris memandang bahwa tata kelola perusahaan yang baik (GCG) merupakan pilar fundamental dalam menjaga integritas, ketangguhan, dan kesinambungan bisnis Bank Victoria. Dalam praktiknya, GCG tidak hanya dijalankan sebagai bentuk kepatuhan terhadap regulasi, tetapi telah diinternalisasi sebagai nilai strategis yang menjiwai setiap proses kerja, keputusan manajerial, hingga relasi Bank dengan para pemangku kepentingan. Dewan Komisaris menilai bahwa Direksi secara konsisten menunjukkan komitmen untuk menanamkan prinsip-prinsip transparansi, akuntabilitas, profesionalisme, dan tanggung jawab ke dalam budaya kerja Bank, yang antara lain tercermin dari telah dibentuknya sejumlah komite di bawah Direksi yang bertugas untuk memastikan sejumlah kegiatan Bank telah dijalankan sesuai koridor peraturan yang berlaku dan mekanisme pengendalian internal yang terus diperkuat

Views on the Implementation of Good Corporate Governance

The Board of Commissioners considers that good corporate governance (GCG) is a fundamental pillar in maintaining the integrity, resilience, and sustainability of Bank Victoria's business. In practice, GCG is not only implemented as a form of regulatory compliance, but has been internalized as a strategic value that inspires every work process, managerial decision, and the Bank's relationship with stakeholders. The Board of Commissioners evaluated that the Board of Directors consistently demonstrated a commitment to instilling the principles of transparency, accountability, professionalism, and responsibility into the Bank's work culture, which were reflected, among others, in the establishment of a number of committees under the Board of Directors with duties to ensure that the Bank's activities were conducted in line with applicable regulatory corridors and continuously strengthened internal control mechanisms, as well

serta keselarasan antara kebijakan operasional dan arah strategis yang ditetapkan. Salah satu bentuk implementasi dari penguatan pengendalian internal adalah dengan dibentuknya satuan kerja *Internal Control over Financial Reporting* (ICoFR) untuk memastikan Bank telah menyusun dan menyampaikan Laporan Keuangan yang baik dan benar sesuai kaidah regulasi yang berlaku.

Sepanjang tahun pelaporan, Dewan Komisaris mencermati bahwa penerapan GCG di Bank Victoria telah menunjukkan kemajuan yang progresif, melalui pelaksanaan penilaian mandiri yang komprehensif serta penyempurnaan struktur dan prosedur kerja secara berkala. Dewan Komisaris senantiasa mengapresiasi langkah-langkah manajemen dalam mengintegrasikan aspek tata kelola ke dalam perencanaan dan pelaksanaan strategi bisnis, termasuk melalui peningkatan peran fungsi pengawasan dan komunikasi lintas unit yang efektif. Inisiatif tersebut menjadi modal penting bagi Bank untuk menghadapi tantangan eksternal secara adaptif, menjaga reputasi kelembagaan, serta menciptakan nilai jangka panjang secara berkelanjutan.

as alignment between operational policies and strategic direction stated. One form of implementation of strengthening internal control is the establishment of Internal Control over Financial Reporting (ICoFR) work unit to ensure that the Bank has prepared and submitted good and correct Financial Statements according to the applicable regulatory rules.

Throughout the reporting year, the Board of Commissioners observed that GCG implementation Bank Victoria showed progressive progress, through the implementation of comprehensive self-assessments and periodic improvements to work structures and procedures. The Board of Commissioners continued to appreciate the management's steps in integrating governance aspects into the planning and implementation of business strategies, including through increasing the role of supervisory function and effective cross-unit communication. These initiatives are important capital for the Bank to face external challenges adaptively, maintain institutional reputation, and create long-term value sustainably.

Pandangan atas Penerapan Tanggung Jawab Sosial dan Lingkungan

Penerapan tanggung jawab sosial dan lingkungan di Bank Victoria merefleksikan pendekatan strategis yang terintegrasi antara keberlanjutan bisnis dan kontribusi terhadap pembangunan inklusif. Komitmen ini tercermin dalam pelaksanaan RAKB yang tidak hanya memenuhi kewajiban regulatif, tetapi juga mengedepankan tanggung jawab moral dalam mendukung terciptanya sistem keuangan yang inklusif dan ramah lingkungan, serta berorientasi jangka panjang. Penyelarasan kebijakan operasional dan manajemen risiko yang mempertimbangkan aspek sosial dan lingkungan menjadi landasan penting dalam memperkuat ketahanan Bank terhadap tantangan eksternal, sekaligus membuka ruang pertumbuhan yang berkelanjutan.

Langkah-langkah penguatan juga terlihat melalui pelaksanaan program tanggung jawab sosial perusahaan (CSR) di bidang kesehatan, pendidikan, dan pemberdayaan masyarakat, yang berkontribusi pada peningkatan kualitas hidup masyarakat dan pelestarian lingkungan sekitar. Selain itu, pemetaan produk dan layanan berwawasan lingkungan mempertegas posisi Bank sebagai institusi yang adaptif terhadap perubahan dan proaktif dalam mendorong nilai keberlanjutan. Dalam konteks tata kelola strategis, penerapan tanggung jawab sosial dan lingkungan dipandang sebagai bagian integral dari misi korporasi jangka panjang yang memperkuat kepercayaan pasar, memperluas manfaat ekonomi sosial, serta meningkatkan daya saing institusional di tengah dinamika sektor perbankan nasional.

Views on the Implementation of Social and Environmental Responsibility

The implementation of social and environmental responsibility at Bank Victoria reflects an integrated strategic approach between business sustainability and contribution to inclusive development. This commitment is reflected in the implementation of RAKB which not only fulfills regulatory obligations, but also prioritizes moral responsibility in supporting the creation of inclusive and environmentally friendly financial system, and has a long-term orientation. Alignment of operational policies and risk management that considers social and environmental aspects is an important foundation in strengthening the Bank's resilience to external challenges, while opening up space for sustainable growth.

Strengthening steps are also seen through the implementation of corporate social responsibility (CSR) programs in health, education, and community empowerment, which contribute to improving the quality of life of the community and preserving the surrounding environment. Furthermore, mapping environmentally friendly products and services emphasizes the Bank's position as an institution that is adaptive to changes and proactive in encouraging sustainable values. In the context of strategic governance, the implementation of social and environmental responsibility is seen as an integral part of the long-term corporate mission that strengthens market confidence, expands socio-economic benefits, and increases institutional competitiveness amidst the dynamics of national banking sector.

Perubahan Komposisi Anggota Dewan Komisaris

Sepanjang tahun 2024, tidak terdapat perubahan terkait komposisi anggota Dewan Komisaris Bank Victoria. Komposisi Dewan Komisaris yang menjabat saat ini meliputi:

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

Changes in the Board of Commissioners' Composition

Throughout 2024, there were no changes to the composition of the Board of Commissioners of Bank Victoria. The current composition of the Board of Commissioners includes:

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

Penutup

Dewan Komisaris menyampaikan apresiasi yang setinggi-tingginya kepada para Pemegang Saham atas kepercayaan dan dukungan yang senantiasa diberikan kepada Bank Victoria. Ucapan terima kasih juga ditujukan kepada Direksi beserta seluruh insan Bank atas dedikasi, integritas, dan kinerja yang konsisten dalam menghadirkan pertumbuhan yang sehat dan berkelanjutan. Penghargaan turut disampaikan kepada seluruh mitra kerja, regulator, dan pemangku kepentingan lainnya atas sinergi dan kolaborasi yang telah terjalin dengan baik sepanjang tahun 2024. Semoga Bank Victoria dapat terus memperkuat peran strategis dalam ekosistem perbankan nasional serta memberikan nilai tambah yang berkelanjutan bagi seluruh pemangku kepentingan di masa mendatang.

Closing

The Board of Commissioners would like to express its highest appreciation to the Shareholders for their trust and support that are always given to Bank Victoria. The Board of Commissioners would also like to express its gratitude to the Board of Directors and all Bank personnel for their dedication, integrity, and consistent performance in enabling sound and sustainable growth. Appreciation is also conveyed to all work partners, regulators, and other stakeholders for their synergy and collaboration properly established throughout 2024. The Board of Commissioners hope Bank Victoria can continue to strengthen its strategic role in the national banking ecosystem and provide sustainable added value for all stakeholders in the future.

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



ZAENAL ABIDIN Ph.D
Komisaris Utama Independen
Independent President Commissioner

Dewan Komisaris
Board of Commissioners



1. **ZAENAL ABIDIN Ph.D**
   Komisaris Utama Independen
   President Commissioner Independent

2. **GUNAWAN TENGGARAHARDJA**
   Komisaris Independen
   Independent Commissioner

3. **SIA LENG HO**
   Komisaris
   Commissioner



ACHMAD FRISCANTONO

Direktur Utama
President Director

Laporan Direksi [POJK D.1]

Report of the Board of Directors

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

Dengan mengucap syukur ke hadirat Tuhan Yang Maha Esa, Direksi PT Bank Victoria International Tbk menyampaikan Laporan Direksi sebagai bagian dari pertanggungjawaban atas pelaksanaan tugas dan kewenangan selama tahun buku 2024. Laporan ini tidak hanya merefleksikan capaian dan dinamika usaha sepanjang tahun berjalan, tetapi juga menggambarkan komitmen berkelanjutan Bank dalam menjaga kesinambungan kinerja, memperkuat fondasi tata kelola, serta memberikan kontribusi nyata bagi perekonomian nasional dan masyarakat luas.

Di tengah dinamika ekonomi global yang terjadi yang disertai dengan tekanan eksternal dan perubahan arah kebijakan moneter di berbagai negara, Bank Victoria tetap mampu menjaga performa usaha yang solid dengan mempertahankan prinsip kehati-hatian, ketahanan operasional, serta efektivitas strategi pertumbuhan. Keberhasilan ini merupakan hasil sinergi antara transformasi digital, peningkatan efisiensi operasional, penguatan permodalan, serta adaptasi terhadap regulasi dan ekspektasi pasar yang terus berkembang. Dengan landasan tata kelola yang kokoh dan semangat keberlanjutan, Bank terus bergerak maju dalam mewujudkan aspirasi sebagai mitra finansial terpercaya bagi seluruh pemangku kepentingan.

By expressing gratitude to the presence of God Almighty, the Board of Directors of PT Bank Victoria International Tbk submits the Report of the Board of Directors as part of its accountability for duties and authorities implementation throughout the 2024 fiscal year. This report not only reflects the achievements and dynamics of business throughout the year, but also illustrates the Bank's sustainability commitment to maintaining performance continuity, strengthening governance foundation, and making concrete contributions to the national economy and the wider community.

Amidst the dynamics of global economy that are accompanied by external pressures and changes in monetary policy direction in various countries, Bank Victoria has been able to maintain its solid business performance by upholding prudential principles, operational resilience, and the effectiveness of growth strategies. This success is the result of synergy between digital transformation, increasing operational efficiency, strengthening capital, and adapting to regulations and market expectations that continue to develop. With a solid foundation of governance and a spirit of sustainability, the Bank continues to move forward in realizing its aspirations as a trusted financial partner for all stakeholders.

Tantangan Ekonomi dan Industri Perbankan Tahun 2024

Tahun 2024 ditandai oleh dinamika ekonomi global yang sarat ketidakpastian, dipengaruhi oleh tiga faktor dominan: eskalasi konflik geopolitik, peralihan kepemimpinan politik di berbagai negara, serta tren perlambatan ekonomi dunia. Ketegangan yang berkelanjutan di kawasan Eropa Timur, Timur Tengah, dan Asia Pasifik menambah tekanan pada stabilitas ekonomi global, khususnya terhadap rantai pasok dan harga komoditas. Di tengah arus perubahan kepemimpinan politik yang mencakup lebih dari 60 negara, termasuk Indonesia, pasar

Economic Challenges and Banking Industry in 2024

Year 2024 was marked by the global economic dynamics full of uncertainty, influenced by three dominant factors: escalation of geopolitical conflicts, shifts in political leadership in various countries, and trend of global economic slowdown. Ongoing tensions in Eastern Europe, the Middle East, and the Asia Pacific region added pressure to the global economic stability, particularly on supply chains and commodity prices. Amidst the flow of changes in political leadership covering more than 60 countries, including Indonesia, the global market faced

global menghadapi potensi perubahan arah kebijakan ekonomi yang signifikan. Meski sejumlah negara maju mencatatkan pertumbuhan moderat, perekonomian global secara keseluruhan masih berada dalam fase pemulihan yang belum merata.

Dalam lanskap tersebut, Indonesia menunjukkan resiliensi yang patut diapresiasi. Di tengah tekanan eksternal dan tantangan domestik, perekonomian nasional tetap tumbuh stabil di kisaran 5,02%, ditopang oleh konsumsi rumah tangga, belanja pemerintah, serta ekspansi sektor investasi dan manufaktur. Nilai tukar Rupiah relatif terkendali, inflasi berhasil ditekan di bawah 2%, serta kebijakan fiskal maupun moneter yang berjalan sinergis turut menjaga momentum pertumbuhan. Namun demikian, tantangan struktural seperti ketimpangan pertumbuhan sektoral, perlambatan investasi swasta, serta dampak pemutusan hubungan kerja (PHK) di sejumlah industri tetap menjadi perhatian yang memerlukan respons kebijakan yang terarah, terukur, dan berkelanjutan.

Industri perbankan Indonesia, sebagai pilar utama stabilitas keuangan nasional, menghadapi tantangan likuiditas yang tidak ringan. Pertumbuhan kredit yang mencapai 10,39% (yoy) tidak sepenuhnya diimbangi oleh pertumbuhan dana pihak ketiga sebesar 4,48% (yoy), sehingga mendorong lembaga keuangan untuk lebih selektif dan adaptif dalam menjaga keseimbangan aset dan liabilitas. Di sisi lain, segmen perbankan syariah, Bank Pembangunan Daerah (BPD), serta Bank Perkreditan Rakyat (BPR) dan BPR Syariah (BPRS) tetap menunjukkan kinerja positif dengan tingkat permodalan yang solid dan pertumbuhan pembiayaan yang sehat. BPD dan BPR/BPRS turut menunjukkan peran penting dalam mendukung ekonomi daerah, meskipun tren konsolidasi masih berlangsung untuk memenuhi ketentuan permodalan. Di tengah berbagai tantangan, industri perbankan tetap memainkan peran sentral dalam menjaga kepercayaan pasar, mendukung pemulihan ekonomi, serta memperkuat daya tahan sistem keuangan nasional.

Kebijakan dan Strategi Keberlanjutan yang Ditempuh Bank Victoria

Sebagai bentuk komitmen terhadap pembangunan berkelanjutan, Bank Victoria menyusun Rencana Aksi Keuangan Berkelanjutan (RAKB) sebagai instrumen strategis dalam memastikan prinsip keberlanjutan terintegrasi ke dalam seluruh aspek operasional dan bisnis Bank Victoria. Penyusunan RAKB tidak hanya mencerminkan kepatuhan terhadap regulasi, tetapi juga merupakan wujud tanggung jawab moral dan sosial dalam membangun sistem keuangan yang inklusif, ramah lingkungan, dan berorientasi jangka panjang. Bank menempatkan pengembangan kapasitas internal, penyesuaian kebijakan dan prosedur internal, serta penguatan lini bisnis berbasis keuangan berkelanjutan sebagai fondasi utama pertumbuhan yang bertanggung jawab dan resilien.

the potential for significant changes in economic policy direction. Though some developed countries recorded moderate growth, the overall global economy was still in an uneven recovery phase.

In this landscape, Indonesia showed its resilience that deserved appreciation. Amid external pressures and domestic challenges, the national economy continued to grow steadily at around 5.02%, supported by household consumption, government spending, and expansion of investment and manufacturing sectors. The Rupiah exchange rate was relatively under control, inflation was managed to be suppressed below 2%, and synergistic fiscal and monetary policies helped maintain the growth momentum. Nevertheless, structural challenges such as sectoral growth disparities, slowing private investment, and the impact of layoffs in several industries remained the concerns that required targeted, measurable, and sustainable policy responses.

The Indonesian banking industry, as the main pillar of national financial stability, encountered a serious liquidity challenge. Loan growth of 10.39% (yoy) was not fully offset by third-party funds growth of 4.48% (yoy), thus encouraging financial institutions to be more selective and adaptive in maintaining the balance of assets and liabilities. On the other hand, sharia banking segment, Regional Development Banks (BPD), as well as Rural Banks (BPR) and Sharia BPRs (BPRS) continued to show positive performance with solid capital levels and sound financing growth. BPD and BPR/BPRS also played an important role in supporting regional economy, though the consolidation trend remained to meet capital requirements. Amidst various challenges, banking industry continued to play a central role in maintaining market confidence, supporting economic recovery, and strengthening the resilience of national financial system.

Policies and Sustainability Strategies Taken by Bank Victoria

As a form of commitment to sustainable development, Bank Victoria has prepared the Sustainable Finance Action Plan (RAKB) as a strategic instrument in ensuring that sustainability principles are integrated into all aspects of operations and business of Bank Victoria. The preparation of RAKB not only reflects compliance with regulations, but also serves as a form of moral and social responsibility in establishing an inclusive, environmentally friendly, and long-term oriented financial system. The Bank places internal capacity development, adjustments to internal policies and procedures, and strengthening sustainable finance-based business lines as the main foundations for responsible and resilient growth.

Pada tahun 2024, pelaksanaan RAKB difokuskan pada dua prioritas utama, yaitu penguatan kapasitas internal dan penyesuaian peraturan internal, sebagai pijakan awal menuju transformasi keberlanjutan yang menyeluruh. Berbagai langkah konkret telah dilakukan, seperti pelatihan keuangan berkelanjutan untuk pelatih internal (*training for trainers*), penyempurnaan kebijakan dan prosedur operasional, serta pemetaan produk dan layanan berwawasan lingkungan. Selaras dengan itu, Bank juga melaksanakan tanggung jawab sosial perusahaan (CSR) di bidang kesehatan, pendidikan, dan kemasyarakatan sebagai bagian dari kontribusi aktif terhadap kesejahteraan masyarakat dan pelestarian lingkungan. Penerapan prinsip etika bisnis dalam setiap proses menjadi penopang utama dalam mitigasi risiko dan penciptaan nilai jangka panjang bagi seluruh pemangku kepentingan.

In 2024, the implementation of RAKB focused on two main priorities, namely strengthening internal capacity and adjusting internal regulations, as initial steps towards a comprehensive sustainability transformation. Various concrete steps were taken, such as sustainable finance training for internal trainers, improving operational policies and procedures, and mapping environmentally friendly products and services. In line with this, the Bank also carries out corporate social responsibility (CSR) in health, education, and society as part of an active contribution to community welfare and environmental preservation. The application of ethical business principles in every process is the main support in risk mitigation and long-term value creation for all stakeholders.

Sejalan dengan perubahan perilaku nasabah yang kian mengarah pada preferensi digital, Bank Victoria juga terus memperkuat strategi keberlanjutan melalui transformasi digital yang progresif dan adaptif. Pengembangan teknologi informasi difokuskan pada peningkatan kapabilitas layanan digital, termasuk penyempurnaan internet dan *mobile banking*, penguatan infrastruktur keamanan data, dan modernisasi sistem operasional seperti *Single Sign-On*, *Data Loss Prevention*, serta penggantian sistem *call center* dan *treasury*. Inisiatif *digital onboarding*, kerja sama dengan kanal *peer-to-peer lending*, serta ekspansi penyaluran kredit melalui *fintech*, BPR, dan koperasi menjadi bagian integral dari ekosistem digital Bank yang inklusif. Dengan strategi yang holistik dan berorientasi masa depan, Bank Victoria berkomitmen untuk menjadikan keberlanjutan sebagai nilai inti yang melekat dalam proses bisnis, tata kelola, serta inovasi teknologi keuangan.

In line with changes in customer behavior that are increasingly moving towards digital preferences, Bank Victoria also continues to strengthen its sustainability strategy through progressive and adaptive digital transformation. The development of information technology is focused on improving digital service capabilities, including improving internet and mobile banking, strengthening data security infrastructure, and modernizing operational systems such as Single Sign-On, Data Loss Prevention, and replacing call center and treasury systems. Digital onboarding initiatives, partnership with peer-to-peer lending channels, and expansion of lending through fintech, BPR, and cooperatives are integral parts of the Bank's inclusive digital ecosystem. With a holistic and future-oriented strategy, Bank Victoria is committed to making sustainability a core value inherent in business processes, governance, and financial technology innovation.

Peranan Direksi dalam Perumusan dan Implementasi Strategi Keberlanjutan

Direksi Bank Victoria memegang peranan sentral dalam merumuskan dan mengimplementasikan strategi keberlanjutan yang menyeluruh dan terintegrasi. Perumusan strategi tersebut dilakukan dengan berpedoman pada kesinambungan tujuan dan target dalam RAKB yang disusun secara komprehensif. Dalam menjalankan strategi, Direksi senantiasa mempertimbangkan nilai-nilai perusahaan, dinamika pasar, serta tantangan eksternal yang berpotensi memengaruhi kinerja bisnis. Keputusan strategis yang diambil mencakup penetapan arah jangka panjang, pengelolaan risiko secara terukur, dan pengembangan inisiatif yang adaptif untuk menjamin kesinambungan pertumbuhan dan pencapaian visi Bank secara berkelanjutan.

Sebagai bagian dari tanggung jawab manajerial, Direksi memastikan agar seluruh unit kerja menjalankan strategi yang ditetapkan secara efektif dan efisien. Pengawasan atas implementasi dilakukan secara

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

Bank Victoria's Board of Directors plays a central role in formulating and implementing a comprehensive and integrated sustainability strategy. The strategy formulation is carried out based on the sustainability of objectives and targets in RAKB prepared comprehensively. In implementing the strategy, the Board of Directors always considers the company's values, market dynamics, and external challenges that have the potential to affect business performance. Strategic decisions made include determining long-term directions, managing risks in a measurable manner, and developing adaptive initiatives to ensure the continuity of growth and achievement of the Bank's vision in a sustainable manner.

As part of its managerial responsibility, the Board of Directors ensures that all work units implement the established strategy effectively and efficiently. Supervision of implementation is carried

berkelanjutan melalui rapat internal, rapat gabungan dengan Dewan Komisaris, serta koordinasi intensif dengan komite dan unit kerja pendukung. Direksi juga menetapkan indikator kinerja yang terukur dan transparan guna memfasilitasi proses evaluasi yang objektif terhadap pencapaian target strategis. Di tengah kondisi pasar yang dinamis, Direksi berperan aktif dalam melakukan penyesuaian strategis secara tepat waktu agar Bank tetap tangguh, adaptif, dan relevan dalam menghadapi tantangan masa kini maupun masa depan.

Pencapaian Target dan Kinerja Bank Victoria

Sepanjang tahun 2024, Bank Victoria berhasil mencatat pertumbuhan kinerja keuangan yang positif dan berkelanjutan di tengah dinamika ekonomi dan sektor perbankan domestik. Total aset Bank meningkat sebesar 4,80%, dari Rp29,62 triliun pada tahun 2023 menjadi Rp31,05 triliun di tahun 2024, atau setara dengan 103,49% dari target yang ditetapkan. Peningkatan ini mencerminkan efektivitas strategi ekspansi dan penguatan bisnis inti yang dijalankan secara konsisten. Di sisi lain, liabilitas juga mengalami pertumbuhan sebesar 5,09% menjadi Rp27,11 triliun, sejalan dengan peningkatan penghimpunan dana pihak ketiga dan optimalisasi struktur pendanaan yang lebih adaptif terhadap arah suku bunga pasar.

Selaras dengan pertumbuhan aset, kinerja pendapatan Bank turut mengalami perkembangan yang dinamis. Pendapatan bunga yang mencatat pertumbuhan sebesar 13,06% menjadi Rp2,08 triliun, mencerminkan peningkatan portofolio aset produktif, khususnya dari kredit yang disalurkan. Namun demikian, peningkatan beban bunga akibat tren kenaikan suku bunga acuan selama tahun 2024 turut menekan margin bunga bersih. Hal ini tercermin dari penurunan pendapatan bunga bersih sebesar 5,21%, dari Rp578,73 miliar menjadi Rp548,60 miliar, atau setara dengan 102,90% dari target yang ditetapkan. Meski demikian, Bank mampu mengompensasi tekanan tersebut melalui peningkatan pendapatan operasional lainnya yang melonjak sebesar 44,35%, terutama dari aktivitas jasa dan hasil sinergi digitalisasi layanan. Dengan demikian, laba bersih tahun berjalan meningkat signifikan sebesar 15,76%, dari Rp101,82 miliar pada 2023 menjadi Rp117,86 miliar di tahun 2024, mencapai 111,54% dari target laba bersih yang telah ditetapkan.

Dari sisi intermediasi, Bank Victoria menunjukkan kinerja yang solid dengan pertumbuhan kredit sebesar 10,37% menjadi Rp20,56 triliun, atau mencapai 102,61% dari target yang ditetapkan. Peningkatan ini didukung oleh strategi ekspansi kredit secara selektif, pengembangan kanal penyaluran kredit digital, serta kerja sama dengan berbagai mitra keuangan. Di sisi lain, total simpanan

out continuously through internal meetings, joint meetings with the Board of Commissioners, and intensive coordination with committees and supporting work units. The Board of Directors also sets measurable and transparent performance indicators to facilitate an objective evaluation process for achieving strategic targets. In the midst of dynamic market conditions, the Board of Directors plays an active role in making strategic adjustments in a timely manner so that the Bank remains resilient, adaptive, and relevant in facing current and future challenges.

Target Achievement and Performance of Bank Victoria

Throughout 2024, Bank Victoria managed to record positive and sustainable financial performance growth amidst the dynamics of domestic economy and banking sector. The Bank's total assets increased by 4.80%, from Rp29.62 trillion in 2023 to Rp31.05 trillion in 2024, or equivalent to 103.49% of the target set. This increase reflected the effectiveness of expansion strategy and strengthening of the core business consistently implemented. On the other hand, liabilities also grew by 5.09% to Rp27.11 trillion, in line with the increase in third-party funds and optimization of a more adaptive funding structure to the direction of market interest rates.

In line with asset growth, the Bank's income performance also experienced dynamic development. Interest income, which recorded a growth of 13.06% to Rp2.08 trillion, reflected an increase in earning assets portfolio, particularly from lending. However, the increase in interest expense due to the upward trend in benchmark interest rates in 2024 also put pressure on the net interest margin. This was reflected in the decrease in net interest income by 5.21%, from Rp578.73 billion to Rp548.60 billion, or equivalent to 102.90% of the target set. Nevertheless, the Bank was able to compensate for this pressure through an increase in other operating income that jumped by 44.35%, particularly from service activities and the results of service digitalization synergies. Therefore, the net profit for the year increased significantly by 15.76%, from Rp101.82 billion in 2023 to Rp117.86 billion in 2024, reaching 111.54% of the net profit target set.

In terms of intermediation, Bank Victoria showed solid performance with loan growth of 10.37% to Rp20.56 trillion, or reaching 102.61% of the target set. This increase was supported by selective loan expansion strategy, development of digital lending channels, and partnership with various financial partners. On the other hand, total deposit from customers grew by 4.03% to Rp23.33 trillion, reflecting

nasabah tumbuh 4,03% menjadi Rp23,33 triliun, mencerminkan tingkat kepercayaan masyarakat yang tetap terjaga serta efektivitas produk simpanan yang ditawarkan Bank.

Dalam mengejar pertumbuhan ekonomi yang sehat, Bank menaruh perhatian pada pertumbuhan kegiatan usaha berkelanjutan yang bergerak di bidang pencegahan dan pengendalian polusi, pengelolaan sumber daya alam hayati dan penggunaan lahan yang berkelanjutan, kegiatan usaha dan/atau kegiatan lain yang berwawasan lingkungan lainnya, serta kegiatan UMKM. Penyaluran pembiayaan kepada empat dari 12 kategori kegiatan usaha berkelanjutan tersebut mencapai 18,20% dari total penyaluran kredit, tumbuh 6,69% dari tahun sebelumnya hingga menjadi Rp3,77 triliun. Bank pun aktif melaksanakan literasi dan inklusi keuangan kepada lembaga pendidikan di area Jabodetabek untuk meningkatkan wawasan dan kemampuan merencanakan keuangan sejak dini.

Bank juga terus mengupayakan optimalisasi penggunaan sumber daya alam dalam aktivitas operasional guna meminimalkan dampak lingkungan. Dari inisiatif ini, Bank dapat meningkatkan efisiensi penggunaan energi sebesar 0,00233 GJ/juta Rupiah dan efisiensi penggunaan air sebesar 0,00054 m^3/juta Rupiah. Intensitas emisi dari penggunaan energi pun berkurang sebesar 0,00007 tonCO_2eq/juta Rupiah. Seluruh capaian ini menjadi fondasi penting dalam mendorong pertumbuhan bisnis yang sehat, inklusif, dan berkelanjutan di tengah kondisi pasar yang terus berevolusi.

Komitmen Bank Victoria akan Penerapan Keuangan Berkelanjutan

Bank Victoria menegaskan komitmennya dalam mengintegrasikan prinsip keuangan berkelanjutan ke dalam seluruh aspek operasional dan strategis Perseroan. Sepanjang tahun 2024, langkah tersebut diwujudkan melalui implementasi RAKB yang memprioritaskan pengembangan kapasitas internal dan penyesuaian peraturan internal Bank. Dalam pengembangan kapasitas internal, Bank meningkatkan kompetensi sumber daya manusia melalui pelatihan mengenai keuangan berkelanjutan serta melakukan penyesuaian uraian tugas karyawan yang berkaitan langsung dengan implementasi prinsip-prinsip tersebut. Pendekatan ini memperkuat fondasi pemahaman dan kepedulian seluruh insan Bank terhadap keberlanjutan, selaras dengan visi dan misi yang menjunjung tinggi nilai tanggung jawab sosial dan lingkungan.

Sementara itu, pada aspek regulasi internal, Bank Victoria secara berkelanjutan menyusun dan memperbarui kebijakan serta prosedur operasional, termasuk penyempurnaan kebijakan manajemen risiko dengan memasukkan dimensi risiko sosial dan lingkungan hidup sebagai elemen penting dalam penilaian

the level of public trust that was maintained and the effectiveness of savings products offered by the Bank.

In pursuing sound economic growth, the Bank pays attention to the growth of sustainable business activities engaged in pollution prevention and control, management of natural resources and sustainable land use, business activities and/or other environmentally friendly activities, and MSME activities. The distribution of financing to four of the 12 categories of sustainable business activities reached 18.20% of the total lending, grew by 6.69% from that of the previous year to Rp3.77 trillion. The Bank is also actively implementing financial literacy and inclusion to educational institutions in Jabodetabek area to improve insight and ability to plan finances early.

The Bank also strives to optimize the use of natural resources in its operational activities to minimize environmental impacts. From this initiative, the Bank was able to increase energy efficiency by 0.00233 GJ/million Rupiah and water efficiency by 0.00054 m^3/million Rupiah. The intensity of emissions from energy use was also reduced by 0.00007 tonsCO_2eq/million Rupiah. All of these achievements are an important foundation in driving sound, inclusive, and sustainable business growth amidst evolving market conditions.

Bank Victoria's Commitment to Implementing Sustainable Finance

Bank Victoria affirms its commitment to integrating sustainable finance principles into all operational and strategic aspects of the Company. Throughout 2024, these steps were realized through the implementation of RAKB which prioritized internal capacity development and adjustments to the Bank's internal regulations. In developing internal capacity, the Bank improves human capital competencies through training on sustainable finance and adjusting employees' duty descriptions that are directly related to the implementation of these principles. This approach strengthens the foundation of all Bank personnel's understanding and concern for sustainability, in line with the vision and mission that uphold the values of social and environmental responsibility.

Meanwhile, in terms of internal regulations, Bank Victoria continuously prepares and updates operational policies and procedures, including improving risk management policies by including social and environmental risk dimensions as important elements in risk assessment. This process is carried out through

risiko. Proses ini dilaksanakan melalui sinergi antara Unit Sistem dan Prosedur serta berbagai unit kerja terkait guna memastikan kebijakan yang dihasilkan relevan dan aplikatif. Dengan menjadikan RAKB sebagai panduan strategis, Bank Victoria berkomitmen untuk terus meningkatkan kinerja keuangan yang berkelanjutan, memperluas dampak positif terhadap masyarakat dan lingkungan, serta menciptakan nilai jangka panjang bagi seluruh pemangku kepentingan secara konsisten dan bertanggung jawab.

Penerapan Tata Kelola Perusahaan yang Baik

Dalam menjalankan peran sebagai lembaga jasa keuangan dan emiten yang tunduk pada prinsip-prinsip keterbukaan, Bank Victoria senantiasa menempatkan tata kelola perusahaan yang baik atau *Good Corporate Governance* (GCG) sebagai instrumen penting dalam memperkuat ketahanan dan daya saing bisnis. Bagi Bank, GCG bukan sekadar kewajiban kepatuhan, tetapi merupakan bagian integral dari strategi manajerial yang mengarahkan setiap proses bisnis untuk dijalankan secara transparan, akuntabel, dan berorientasi jangka panjang. Prinsip-prinsip GCG secara aktif diinternalisasi ke dalam proses kerja setiap insan Bank, sehingga penerapannya diharapkan mampu membangun sistem kerja yang lebih tanggap, berintegritas, dan adaptif terhadap risiko serta peluang pasar yang terus berkembang, sebagai komitmen kolektif dalam membangun budaya kerja yang profesional.

Sebagai bagian dari mekanisme penguatan tata kelola, manajemen secara berkala melakukan penilaian mandiri (*self-assessment*) terhadap penerapan GCG berdasarkan 11 aspek penilaian yang mencakup struktur tata kelola, proses pengambilan keputusan, serta hasil-hasil kinerja yang didapatkan termasuk kinerja komite-komite yang dimiliki Bank. Sesuai dengan perkembangan regulasi yang berlaku, Bank telah menambahkan 5 (lima) aspek tambahan dalam pelaksanaan *self-assessment* GCG, sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023. Aspek-aspek tambahan tersebut meliputi aspek pemberian remunerasi, aspek Pemegang Saham, penerapan strategi anti-*fraud*, penerapan keuangan berkelanjutan, serta penerapan tata kelola dalam kelompok usaha, baik dari sisi *governance structure, governance process*, dan *governance outcome*. Hasil evaluasi tersebut menjadi pijakan dalam melakukan penyesuaian dan penyempurnaan pada *soft structure*, seperti kebijakan internal, pedoman kerja, serta *standard operating procedure* (SOP) agar selaras dengan praktik terbaik di industri perbankan. Manajemen juga terus mengedepankan penguatan fungsi pengendalian internal dan budaya risiko yang terintegrasi dalam proses bisnis, termasuk dalam perencanaan strategis dan penyusunan Rencana Kerja dan Anggaran Tahunan (RKAT). Dalam konteks tersebut, komunikasi lintas unit menjadi kunci dalam memastikan tidak adanya tumpang tindih kebijakan, sekaligus memperkuat kecepatan dan ketepatan respons Bank dalam menghadapi dinamika ekonomi, sosial, maupun geopolitik yang terjadi secara berkelanjutan.

synergy between the System and Procedure Unit and various related work units to ensure that the resulting policies are relevant and applicable. By making RAKB a strategic guide, Bank Victoria is committed to continuously improving sustainable financial performance, expanding positive impacts on society and environment, and creating long-term value for all stakeholders consistently and responsibly.

Implementation of Good Corporate Governance

In carrying out its role as a financial services institution and issuer that is subject to the principles of transparency, Bank Victoria always places Good Corporate Governance (GCG) as an important instrument in strengthening business resilience and competitiveness. For the Bank, GCG is not only a compliance obligation, but also an integral part of managerial strategy that directs every business process to be carried out transparently, accountably, and with a long-term orientation. GCG principles are actively internalized into work processes of all personnel of the Bank, so that its implementation is expected to build a work system that is more responsive, has integrity, and is adaptive to risks and market opportunities that continue to develop, as a collective commitment in building a professional work culture.

As part of governance strengthening mechanism, the management periodically conducts self-assessments of GCG implementation based on 11 assessment aspects that include governance structure, decision-making processes, and performance results obtained, including the performance of the Bank's committees. In accordance with the development of applicable regulations, the Bank has added 5 (five) additional aspects in implementing GCG self-assessment, as stipulated in Financial Services Authority Regulation No. 17 of 2023. These additional aspects include remuneration aspect, Shareholders aspect, anti-fraud strategy implementation, sustainable finance implementation, and governance implementation in business groups, including in terms of governance structure, governance process, and governance outcome. The evaluation results serve as the basis for making adjustments and improvements to the soft structure, such as internal policies, work guidelines, and standard operating procedures (SOPs) to align with best practices in banking industry. The management also continues to prioritize strengthening the function of internal control and risk culture that are integrated into business processes, including in strategic planning and preparing the Annual Work Plan and Budget (RKAT). In such context, cross-unit communication is the key to ensuring that there is no overlapping policy, while strengthening the speed and accuracy of the Bank's response in facing economic, social, and geopolitical dynamics that occur continuously.

Prospek Usaha Tahun 2025

Memasuki tahun 2025, prospek usaha Bank Victoria dihadapkan pada lanskap ekonomi global yang masih diselimuti ketidakpastian. Dana Moneter Internasional (IMF) memproyeksikan pertumbuhan ekonomi dunia sebesar 3,2%, sedikit terkoreksi dari estimasi sebelumnya, seiring meningkatnya tensi geopolitik global serta kebijakan proteksionisme perdagangan yang membayangi. Di tengah dinamika tersebut, Indonesia menunjukkan ketangguhan dengan proyeksi pertumbuhan ekonomi yang tetap solid di kisaran 5,0–5,2%, sebagaimana disampaikan oleh Bank Indonesia, IMF, Bank Dunia, dan Asian Development Bank (ADB). Didukung oleh kebijakan fiskal dan moneter yang adaptif, penguatan konsumsi domestik, serta pemulihan investasi, Indonesia diprediksi mampu menjaga stabilitas makroekonomi dan menjaga daya tahan sektor-sektor strategis, termasuk perbankan.

Sejalan dengan itu, prospek industri perbankan nasional tetap menunjukkan optimisme yang terukur, dengan mempertimbangkan potensi pertumbuhan kredit yang diproyeksikan meningkat menjadi 11–13% pada tahun 2025. Dukungan regulasi dari Otoritas Jasa Keuangan (OJK) turut memperkuat fondasi industri melalui penerbitan berbagai kebijakan strategis, mulai dari penguatan manajemen likuiditas dan permodalan, pengembangan inklusi keuangan melalui skema pembiayaan UMKM dan sektor prioritas, hingga penegakan tata kelola melalui strategi *anti-fraud* dan pelaporan keuangan yang terintegrasi. Tantangan struktural seperti penurunan kontribusi ekspor manufaktur dan tren perlambatan konsumsi rumah tangga di kawasan Asia-Pasifik tetap menjadi perhatian, namun potensi pertumbuhan domestik yang besar tetap menjadi kekuatan utama yang dapat dimanfaatkan oleh industri perbankan secara progresif dan berkelanjutan.

Dalam konteks tersebut, Bank Victoria memandang tahun 2025 sebagai momentum penting untuk memperkuat posisi kompetitif melalui pengembangan lanjutan layanan digital, optimalisasi portofolio kredit yang sehat, serta penyesuaian strategi bisnis yang responsif terhadap dinamika pasar. Manajemen juga akan terus mencermati potensi risiko eksternal, seperti volatilitas nilai tukar, fluktuasi harga komoditas, serta tekanan biaya dana (*cost of fund*), dengan memperkuat cadangan kerugian penurunan nilai (CKPN) dan tata kelola risiko yang bijak. Melalui sinergi antara kebijakan internal yang adaptif dan kepatuhan terhadap kerangka regulasi nasional, Bank Victoria berkomitmen untuk mendukung pertumbuhan ekonomi inklusif, menciptakan nilai jangka panjang, serta menjadi bagian dari solusi keuangan berkelanjutan di tengah tantangan global yang terus berkembang.

Business Outlook for 2025

Entering 2025, Bank Victoria's business prospects are faced with a global economic landscape that is still shrouded in uncertainty. The International Monetary Fund (IMF) projects global economic growth of 3.2%, slightly corrected from the previous estimate, as the global geopolitical tensions increase and the trade protectionism policies loom. Amid these dynamics, Indonesia has shown its resilience with economic growth projections that remain solid in the range of 5.0–5.2%, as conveyed by Bank Indonesia, the IMF, the World Bank, and the Asian Development Bank (ADB). Supported by adaptive fiscal and monetary policies, strengthening domestic consumption, and investment recovery, Indonesia is predicted to be able to maintain its macroeconomic stability and maintain the resilience of strategic sectors, including banking.

In line with that matter, the prospects for national banking industry continue to show measurable optimism, considering the potential for loan growth projected to increase to 11–13% in 2025. Regulatory support from the Financial Services Authority (OJK) has also strengthened the industry's foundation through the issuance of various strategic policies, ranging from strengthening liquidity and capital management, developing financial inclusion through MSME and priority sector financing schemes, to enforcing governance through anti-fraud strategies and integrated financial reporting. Structural challenges such as the declining contribution of manufacturing exports and the slowing trend of household consumption in Asia-Pacific region remain a concern, but the potential for large domestic growth remains the major strength that can be utilized progressively and sustainably by the banking industry.

In this context, Bank Victoria views 2025 as an important momentum to strengthen its competitive position by further developing digital services, optimizing sound loan portfolio, and adjusting business strategies that are responsive to market dynamics. The management will also continue to monitor potential external risks, such as exchange rate volatility, commodity price fluctuations, and cost of funds pressures, by strengthening allowances for impairment losses (CKPN) and prudent risk governance. Through synergy between adaptive internal policies and compliance with the national regulatory framework, Bank Victoria is committed to supporting inclusive economic growth, creating long-term value, and being part of sustainable financial solutions amidst evolving global challenges.

Perubahan Komposisi Anggota Direksi

Sepanjang tahun 2024, tidak terdapat perubahan terkait komposisi anggota Direksi Bank Victoria. Adapun komposisi Direksi yang menjabat saat ini meliputi:

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

Changes in the Board of Directors' Composition

Throughout 2024, there were no changes to the composition of the Board of Directors of Bank Victoria. The current composition of the Board of Directors includes as follows:

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

Penutup

Di penghujung laporan ini, Direksi menyampaikan apresiasi yang setinggi-tingginya kepada Dewan Komisaris atas arahan strategis yang senantiasa memperkuat ketangguhan tata kelola; kepada seluruh insan Bank Victoria atas dedikasi dan profesionalisme yang menjadi fondasi keberhasilan Perseroan; serta kepada para Pemegang Saham dan seluruh pemangku kepentingan atas kepercayaan, sinergi, dan dukungan yang tak ternilai. Menatap masa depan, Direksi meyakini bahwa dengan komitmen yang teguh, semangat transformasi yang berkelanjutan, serta visi yang terarah, Bank Victoria akan terus tumbuh menjadi institusi keuangan yang relevan, resilien, dan berdaya saing tinggi di tengah tantangan zaman. Bersama, kita melangkah mantap menuju masa depan yang lebih kuat, berkelanjutan, dan bermakna bagi seluruh pihak yang mempercayakan masa depannya bersama Bank Victoria.

Closing

At the end of this report, the Board of Directors would like to express its highest appreciation to the Board of Commissioners for their strategic direction that continues to strengthen governance resilience; to all Bank Victoria personnel for their dedication and professionalism that serve as the foundation of the Company's success; and to Shareholders and all stakeholders for their trust, synergy, and invaluable support. In facing the future, the Board of Directors believes that with strong commitments, spirit of sustainable transformation, and focused vision, Bank Victoria will continue to grow into a relevant, resilient, and highly competitive financial institution amidst the challenges of the times. Together, we move steadily towards a stronger, more sustainable, and more meaningful future for all parties who entrust their future to Bank Victoria.

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



ACHMAD FRISCANTONO
Direktur Utama
President Director

Direksi
Board of Directors



1. **ACHMAD FRISCANTONO**
   Direktur Utama
   President Director

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

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

4. **DEBORA WAHJUTIRTO TANOYO**
   Direktur Keuangan
   Director of Finance

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

Tanggung Jawab Laporan Tahunan dan Keberlanjutan

Annual and Sustainability Report Responsibility

Surat Pernyataan Anggota Dewan Komisaris tentang Tanggung Jawab atas Laporan Tahunan dan Keberlanjutan 2024 PT Bank Victoria International Tbk

Statement of Members of the Board of Commissioners on the Responsibility for the 2024 Annual and Sustainability Report of PT Bank Victoria International Tbk

Kami, yang bertanda tangan di bawah ini, menyatakan bahwa semua informasi dalam Laporan Tahunan dan Keberlanjutan PT Bank Victoria International Tbk tahun 2024 telah dimuat secara lengkap dan bertanggung jawab penuh atas kebenaran isi Laporan Tahunan dan Keberlanjutan Bank.

Demikian pernyataan ini dibuat dengan sebenarnya.

We, the undersigned, hereby declare that all information in the Annual and Sustainability Report of PT Bank Victoria International Tbk for year 2024 has been fully contained and we shall be fully responsible to the correctness of contents in the Annual and Sustainability Report of the Bank.

This statement is hereby made in all truthfulness.

Jakarta, 16 April 2025

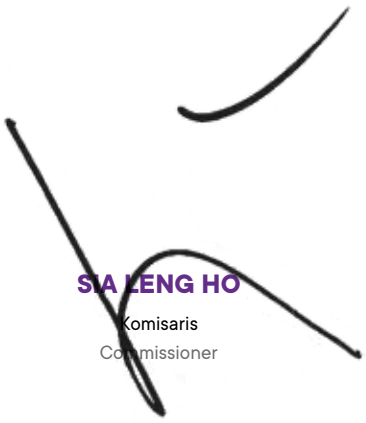
Dewan Komisaris
Board of Commissioners



ZAENAL ABIDIN Ph.D
Komisaris Utama Independen
Independent President Commissioner



GUNAWAN TENGGARAHARDJA
Komisaris Independen
Independent Commissioner



SIA LENG HO
Komisaris
Commissioner

Surat Pernyataan Anggota Direksi tentang Tanggung Jawab atas Laporan Tahunan dan Keberlanjutan 2024 PT Bank Victoria International Tbk

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Jakarta, 16 April 2025

Direksi
Board of Directors

ACHMAD FRISCANTONO
Direktur Utama
President Director

RUSLI
Wakil Direktur Utama
Deputy President Director

LEMBING
Direktur Bisnis
Director of Business

DEBORA WAHJUTIRTO TANOYO
Direktur Keuangan
Director of Finance

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



Profil Perusahaan
Company Profile



Identitas Perusahaan
Company Identity

Nama Perusahaan [POJK C.2]
Company Name

bank victoria

PT Bank Victoria International Tbk

Gedung Graha BIP Lantai 10
Graha BIP Building 10th Floor
Jl. Gatot Subroto Kav. 23
Jakarta Selatan / South Jakarta 12930

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

Tanggal Pendirian
Date of Establishment

28 Oktober 1992
28 October 1992

Dasar Hukum Pendirian
Legal Basis of Establishment

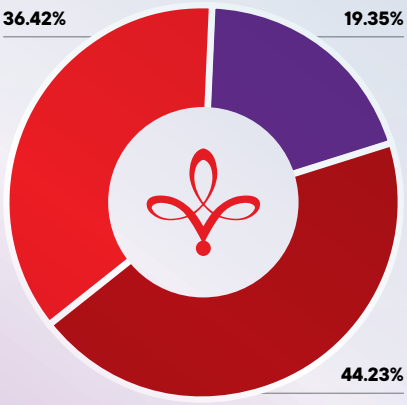
Didirikan dengan nama PT Bank Victoria pada tanggal 28 Oktober 1992 berdasarkan Akta Notaris Amrul Partomuan Pohan, SH, LLM No. 71 yang selanjutnya diadakan pembetulan dengan Akta No. 30 tanggal 8 Juni 1993 dari notaris yang sama.

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

Bidang Usaha
Line of Business

Bank Umum
Commercial Bank

Kepemilikan Saham
Share Ownership



PT Victoria Investama Tbk	**: 44.23%**
Masyarakat / Public <5%	**: 36.42%**
Suzanna Tanojo	**: 19.35%**

Dasar Hukum Perubahan Nama
Legal Basis of Name Change

Menjadi PT Bank Victoria International berdasarkan Akta Pembetulan No. 30 tanggal 8 Juni 1993 yang dibuat di hadapan Notaris Amrul Partomuan Pohan, SH, LLM.

Became PT Bank Victoria International based on Deed of Correction No. 30 dated 8 June 1993 made before Notary Amrul Partomuan Pohan, SH, LLM.

Kode Saham
Share Code

BVIC

Modal Dasar
Authorized Capital

Rp4,100,000,000,000

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

30 Juni 1999
30 June 1999

Modal Ditempatkan dan Disetor Penuh
Subscribed and Fully Paid-Up Capital

Rp1,584,853,290,600

Media Sosial
Social Media

@bankvictoria

Bank Victoria

BankVictoriaID

PT Bank Victoria International Tbk

Perubahan Organisasi yang Bersifat Signifikan [POJK C.6]

Significant Changes in Organization

Sepanjang tahun 2024, tidak terdapat perubahan signifikan yang terjadi pada Bank Victoria, baik terkait penutupan atau pembukaan cabang baru, pembukaan atau penutupan unit usaha baru, maupun penggabungan usaha.

Throughout 2024, there were no significant changes that occurred at Bank Victoria, either related to closing or opening new branch, opening or closing new business unit, or business merger.

Riwayat Singkat
Brief History

1992

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

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

1994

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

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

1997

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

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

1999

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

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

2000

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

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

2003

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

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

2006

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

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

2007

Mengakuisisi PT Bank Swaguna sebagai Entitas Anak.

Acquired PT Bank Swaguna as a Subsidiary.

2008

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

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

2010

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

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

2011

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

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

2016

- Memperoleh izin operasional sebagai Bank Devisa berdasarkan Surat Kepala Departemen Perizinan dan Informasi Perbankan Otoritas Jasa Keuangan No. S-423/PB.12/2016 pada tanggal 13 Desember 2016.
- Memberikan layanan transaksi dalam valuta asing yang meliputi transaksi pengiriman uang (*remittance*), perdagangan international (*trade finance*), *treasury* serta layanan interbank lainnya setelah menjadi Bank Devisa.
- Melakukan Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu (PMTHMETD) sebesar 9,00% oleh DEG (Deutsche Investitions-Und Entwicklungsgesellschaft MbH).
- Obtained operational license as a Foreign Exchange Bank based on the Letter of Banking Licensing and Information Department Head of the Financial Services Authority No. S-423/PB.12/2016 dated 13 December 2016.
- Providing transaction services in foreign currencies which include remittance transactions, international trade (trade finance), treasury, and other interbank services after becoming a Foreign Exchange Bank.
- Conducted Capital Addition Without Preemptive Rights (PMTHMETD) of 9.00% DEG (Deutsche Investitions-Und Entwicklungsgesellschaft MbH).

2024

- **Melakukan Penambahan Saham Hasil *Exercise* Waran Seri VII PT Bank Victoria International Tbk sejumlah 297.128 Waran.**
- **Melakukan Penawaran Umum Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap I Tahun 2024 sebesar Rp500.000.000.000,-.**
- **Melakukan Penawaran Umum Obligasi Berkelanjutan III Bank Victoria Tahap II Tahun 2024 sebesar Rp500.000.000.000,-.**
- **Melakukan relokasi Kantor Cabang Pembantu (KCP) Senayan City ke KCP Hang Tuah.**
- **Added Shares from Series VII Warrant Exercise of PT Bank Victoria International Tbk of 297,128 Warrants.**
- **Conducted Public Offering of Bank Victoria Continuous Subordinated Bonds III Phase I Year 2024 amounting to Rp500,000,000,000.**
- **Conducted Public Offering of Bank Victoria Continuing Bonds III Phase II Year 2024 amounting to Rp500,000,000,000.**
- **Relocated Senayan City Sub-Branch Office (KCP) to Hang Tuah KCP.**

2023

- Melakukan Penambahan Saham Hasil Exercise Waran Seri VII PT Bank Victoria International Tbk sejumlah 1.064 Waran.
- Melakukan Penawaran Umum Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 sebesar Rp500.000.000.000,-.
- Added Shares from Series VII Warrant Exercise of PT Bank Victoria International Tbk of 1,064 Warrants.
- Conducted Public Offering of Bank Victoria Continuous Bonds III Phase I of 2023 amounting to Rp500,000,000,000.

2022

- Melaksanakan peresmian sebagai Bank Persepsi.
- Melakukan PMHMETD sejumlah 2.553.461.919 lembar saham.
- Melakukan PMHMETD sejumlah 2.807.640.227 lembar saham.
- Bank Victoria melakukan divestasi sebanyak 80% saham milik Bank di Bank Victoria Syariah kepada PT Victoria Investama Tbk.
- Carried out inauguration as Perception Bank.
- Conducted PMHMETD of 2,553,461,919 shares.
- Conducted PMHMETD of 2,807,640,227 shares.
- Bank Victoria divested 80% of the Bank's shares in Bank Victoria Syariah to PT Victoria Investama Tbk.

2021

- PMTHMETD sejumlah 586.205.939 lembar saham oleh PT Victoria Investama Tbk, PT Victoria Insurance Tbk, PT Victoria Alife Indonesia, PT Prolestari Megapersada, PT Regis Pratama Indonesia, dan PT Emperor Finance Indonesia.
- PMTHMETD sejumlah 948.979.590 lembar saham oleh PT Victoria Investama Tbk, PT Victoria Alife Indonesia, PT Victoria Insurance Tbk, PT Victoria Sekuritas Indonesia, PT Regis Pratama Indonesia, PT Tridaya Investindo, PT Emperor Finance Indonesia, dan PT Bhuwanatala Indah Permai Tbk.
- PMTHMETD of 586,205,939 shares by PT Victoria Investama Tbk, PT Victoria Insurance Tbk, PT Victoria Alife Indonesia, PT Prolestari Megapersada, PT Regis Pratama Indonesia, and PT Emperor Finance Indonesia.
- PMTHMETD of 948,979,590 shares by PT Victoria Investama Tbk, PT Victoria Alife Indonesia, PT Victoria Insurance Tbk, PT Victoria Sekuritas Indonesia, PT Regis Pratama Indonesia, PT Tridaya Investindo, PT Emperor Finance Indonesia, and PT Bhuwanatala Indah Permai Tbk.

2020

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

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

2019

- Melakukan Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu (PMTHMETD) sejumlah 280.898.877 lembar saham oleh PT Victoria Investama Tbk dan PT Nata Patindo.
- Memperluas jaringan kantor dengan membuka kantor cabang utama di Solo, Jawa Tengah, dan Medan, Sumatera Utara.
- Conducted Capital Without Preemptive Rights (PMTHMETD) of 280,898,877 shares of PT Victoria Investama Tbk and PT Nata Patindo.
- Expanded the office network by opening main branch offices in Solo, Central Java, and in Medan, North Sumatra.

2018

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

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

Visi dan Misi Perusahaan [POJK C.1]

Company's Vision and Mission

Pernyataan Persetujuan Atas Visi dan Misi Perusahaan

Statement of Approval of the Company's Vision and Mission

Visi dan Misi Perusahaan telah mendapatkan pengesahan dari Dewan Komisaris dan Direksi melalui Surat Keputusan Direksi No. 004/SK-DIR/11/24 tanggal 13 November 2024 tentang Visi dan Misi Bank.

The Company's Vision and Mission have been approved by the Board of Commissioners and Board of Directors through the Board of Directors' Decision Letter No. 004/SK-DIR/11/24 dated 13 November 2024 on the Bank's Vision and Mission.

VISI Vision

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

To become Customers' preferred Bank that is trusted, sound, efficient, and supporting sustainable growth.



MISI Mission

Customers

Memenuhi kebutuhan, membina hubungan baik, serta memberi layanan terbaik kepada nasabah.

Fulfilling needs, developing good relationship, and providing the best services for the customers.

People

Mengembangkan sumber daya manusia yang berintegritas, profesional, dan berdedikasi.

Developing human resources with integrity, professionalism, and dedication.

Operations

Menjalankan operasional yang mudah, cepat, dan handal dengan mengikuti ketentuan yang berlaku.

Conducting easy, fast, and reliable operations by following the applicable regulations.

Governance, Risk, and Compliance

Menerapkan tata kelola bank dan manajemen risiko yang baik secara konsisten dengan memperhatikan prinsip kehatian-hatian.

Implementing good bank governance and risk management consistently with due observance of the principle of prudence.

Digitalisasi / Digitalization

Melaksanakan transformasi digital untuk inovasi layanan prima dan meningkatkan daya saing.

Carrying out digital transformation for innovation in prime services and increasing competitiveness.

Pilihan Nasabah	Dipercaya	Sehat dan Efisien	Mendukung Pertumbuhan Berkelanjutan
Customers' Preferred	**Trustworthy**	**Sound and Efficient**	**Support Sustainable Growth**
Bank Victoria dikenal, dipercaya, serta menjadi pilihan Nasabah untuk memenuhi kebutuhan Nasabah dalam mendapatkan produk dan layanan perbankan. Bank Victoria is recognized, trusted, and preferred by Customers to fulfill their needs in obtaining banking products and services.	Bank Victoria berkomitmen menjadi bank yang bisa memberikan rasa aman dan kepastian bagi para Nasabah, karyawan, Pemegang Saham, dan *stakeholders* lainnya. Bank Victoria is committed to being the Bank that can provide security and certainty to the Customers, human capital, Shareholders, and other stakeholders.	Bank Victoria mempunyai struktur modal yang kuat, kondisi keuangan yang sehat, serta didukung oleh operasional perbankan yang efisien. Bank Victoria has strong capital structure, sound financial condition, and is supported by efficient banking operation.	Bank Victoria senantiasa memperhatikan pertumbuhan yang mengedepankan aspek manusia (*people*), lingkungan (*planet*), dan nilai bagi pemangku kepentingan (*profit*). Bank Victoria always pays attention to growth that prioritize aspects of people, environment (planet), and value for stakeholders (profit).

Tinjauan Ulang dan Persetujuan Atas Visi dan Misi Perusahaan oleh Dewan Komisaris dan Direksi
Review and Approval of the Company's Vision and Mission by the Board of Commissioners and Board of Directors

Dewan Komisaris dan Direksi senantiasa melakukan tinjauan ulang atas Visi dan Misi yang telah ditetapkan oleh Bank. Tinjauan ulang tersebut dilakukan untuk memastikan Visi dan Misi Bank masih relevan dengan perkembangan bisnis, kebutuhan pemangku kepentingan serta arah persaingan antar pelaku usaha jasa keuangan. Dewan Komisaris dan Direksi Bank menilai bahwa Visi dan Misi Bank saat ini telah sesuai dengan perubahan kondisi lingkungan eksternal maupun internal dan masih relevan di tahun 2024.

The Board of Commissioners and Board of Directors continuously review Vision and Mission that have been set by the Bank. The review is conducted to ensure that the Bank's Vision and Mission are still relevant to business developments, stakeholder needs, and competition direction among financial service business players. The Board of Commissioners and Board of Directors of the Bank consider that the current Bank Vision and Mission are in accordance with changes in external and internal environmental conditions and are still relevant in 2024.

Nilai Budaya Perusahaan
Corporate Cultural Values



S	Q	E	W
Safe	***Quick***	***Easy***	***Warm***
Relasi yang Aman dan Handal Safe and Reliable Relationships	Solusi dan Inovasi yang Cepat, Tepat, Terukur Fast, Precise, Measurable Solutions and Innovation	Mudah dalam Transaksi dan Kolaborasi Easy Transaction and Collaboration	Melayani dengan Peduli, Ramah, dan Asertif Serving with Care, Friendly, and Assertive

Kegiatan Usaha [POJK C.4]
Line of Business

Berdasarkan Pasal 3 Anggaran Dasar Bank sebagaimana yang termaktub dalam Akta No. 26 tanggal 14 Juni 2024, Bank Victoria didirikan dengan maksud dan tujuan untuk menjalankan kegiatan usaha di bank umum konvensional sesuai dengan ketentuan peraturan perundang-undangan yang berlaku.

Based on Article 3 of the Bank's Articles of Association as stated in Deed No. 26 dated 14 June 2024, Bank Victoria was established with the intent and purpose of conducting business activities in conventional commercial bank in line with the applicable provisions of laws and regulations.

Kegiatan Usaha Berdasarkan Anggaran Dasar yang Dijalankan pada Tahun 2024
Business Activities Run in 2024 Based on Articles of Association

Kegiatan Usaha Utama **Main Business Activities**	
• Menghimpun dana dari masyarakat dalam bentuk simpanan giro, deposito berjangka, sertifikat deposito, tabungan, dan/atau bentuk lainnya yang dipersamakan dengan itu;	• Collect funds from the society in the form of current accounts, time deposits, certificates of deposit, savings, and/or other forms equivalent;
• Memberikan kredit;	• Provide credits;
• Menerbitkan surat pengakuan utang;	• Issue debt certificates;
• Membeli, menjual, atau menjamin atas risiko sendiri maupun untuk kepentingan dan atas perintah nasabahnya: a. Surat-surat wesel, termasuk wesel yang diakseptasi oleh Bank yang masa berlakunya tidak lebih lama dari kebiasaan dalam perdagangan surat-surat dimaksud; b. Surat pengakuan utang dan kertas dagang lainnya yang masa berlakunya tidak lebih lama dari kebiasaan dalam perdagangan surat-surat dimaksud; c. Kertas perbendaharaan negara dan surat jaminan pemerintah; d. Sertifikat Bank Indonesia (SBI); e. Obligasi; f. Surat dagang berjangka waktu sampai dengan 1 (satu) tahun; dan g. Instrumen surat berharga lain yang berjangka waktu sampai dengan 1 (satu) tahun;	• Buy, sell, or guarantee on own risk and for the interest and upon the order of its customers: a. Money orders, including accredited money orders by the Bank in which the validity period is not longer than the custom of the trade of the said papers; b. Debt certificates and other trade papers in which the validity period is not longer than the custom of the trade of the said papers; c. State treasury bills and government guarantee letter; d. Bank Indonesia Certificates (SBI); e. Bonds; f. Commercial papers with validity period of up to 1 (one) year; and g. Other securities instruments with validity period of up to 1 (one) year;
• Memindahkan uang, baik untuk kepentingan sendiri maupun untuk kepentingan nasabah;	• Transfer of money, both for own interest and for the customers' interest;
• Menempatkan dana pada, meminjam dana dari, atau meminjamkan dana kepada bank lain, baik dengan menggunakan surat, sarana telekomunikasi maupun dengan wesel unjuk, cek, atau sarana lainnya;	• Place funds in, borrow funds from, or lend funds to other banks, either by mail, telecommunication means, or by sight draft, check, or other means;
• Menerima pembayaran dari tagihan atas surat berharga dan melakukan perhitungan dengan atau antara pihak ketiga;	• Receive payments from claims on securities and perform calculations with or between third parties;
• Melakukan penempatan dana dari nasabah kepada nasabah lainnya dalam bentuk surat berharga yang tercatat di bursa efek;	• Perform placement of funds from a customer to another customer in the form of securities listed in stock exchange;
• Melakukan kegiatan dalam valuta asing dengan memenuhi ketentuan yang ditetapkan oleh Bank Indonesia;	• Perform activities in foreign currencies by meeting the provisions stipulated by Bank Indonesia;
• Menyediakan pembiayaan dan/atau melakukan kegiatan lain berdasarkan prinsip syariah, sesuai dengan ketentuan yang ditetapkan oleh Bank Indonesia; serta	• Provide financing and/or perform other activities based on sharia principles, in accordance with the provisions stipulated by Bank Indonesia; and
• Melakukan kegiatan yang berkaitan dengan penyediaan jasa pembayaran kepada pengguna akhir (*end user*) jasa layanan sistem pembayaran (SP) pada sisi *front end* yang mencakup aktivitas antara lain menampilkan informasi sumber dana, menginisiasi transaksi/*acquiring* (dompet elektronik, *acquirer*, dan *payment gateway*), menerbitkan instrumen/akun pembayaran, dan layanan remintansi/transaksi dana.	• Perform activities related to provision of payment service to end users of payment system (SP) services on the front end which includes activities such as displaying source of funds information, initiating transaction/acquiring (electronic wallet, acquirer, and payment gateway), issuing payment instrument/account, and remittance/fund transaction services.
Kegiatan Usaha Penunjang **Supporting Business Activities**	
• Menyediakan tempat untuk menyimpan barang dan surat berharga;	• Provide place for storing valuables and securities;
• Melakukan kegiatan penitipan untuk kepentingan pihak lain berdasarkan suatu kontrak;	• Conduct custodial activities for the benefits of others under a contract;
• Melakukan kegiatan anjak piutang, usaha kartu kredit, dan kegiatan wali amanat;	• Perform factoring activities, credit card business, and trustee activities;
• Bertindak sebagai pendiri dana pensiun dan pengurus dana pensiun sesuai dengan ketentuan dalam peraturan perundang-undangan dana pensiun yang berlaku;	• Act as the pension fund founder and pension fund manager in accordance with the provisions of the applicable pension fund laws and regulations;
• Melakukan kegiatan penyertaan modal pada bank atau perusahaan lain di bidang keuangan, sewa guna usaha, perusahaan modal ventura, perusahaan efek, asuransi, lembaga kliring penyelesaian dan penyimpanan dengan memenuhi ketentuan yang ditetapkan oleh Bank Indonesia;	• Conduct equity participation in a bank or other company in the field of finance, leasing companies, venture capital firms, securities companies, insurance companies, clearing and settlement institutions in compliance with the provisions stipulated by Bank Indonesia;
• Melakukan kegiatan penyertaan modal sementara untuk mengatasi akibat kegagalan kredit atau kegagalan pembiayaan berdasarkan prinsip syariah, dengan syarat harus menarik kembali penyertaannya dengan memenuhi ketentuan yang ditetapkan oleh Bank Indonesia; serta	• Conduct temporary equity participation to overcome the consequences of credit failure or financing failure based on sharia principles, subject to withdrawal of statements by fulfilling the provisions stipulated by Bank Indonesia; and
• Melakukan kegiatan lain yang lazim dilakukan oleh bank sepanjang tidak bertentangan dengan undang-undang perbankan dan peraturan perundang-undangan yang berlaku.	• Conduct other activities commonly carried out by banks as long as they are not contradictory with banking laws and the applicable laws and regulations.

Produk dan Jasa [POJK C.4]

Products and Services

Dalam menjalankan kegiatan usaha perbankan, Bank Victoria memiliki *line up* produk dan layanan yang lengkap untuk memenuhi kebutuhan transaksi perbankan dan keuangan nasabah. Bank juga terus berinovasi untuk menawarkan produk dan layanan yang sesuai dengan kebutuhan nasabah dan tren industri perbankan saat ini. Pada tahun 2024, produk dan layanan jasa Bank Victoria, antara lain:

In carrying out banking business activities, Bank Victoria has a complete line up of products and services to meet the needs of customers' banking and financial transactions. The Bank also continuously innovates to offer products and services that are in line with customer needs and current banking industry trends. In 2024, Bank Victoria's products and services included:

Jenis Produk/Layanan Type of Products/ Services	Uraian Description	
Produk Simpanan Savings Products	**Tabungan** • Tabungan Victoria • Tabungan VIP Safe • Tabungan Victoria Junior • Tabungan Victoria Bisnis • TabunganKu • Tabungan Victoria Maxima • Tabungan Victoria EduSave • Tabungan VIP Safe Digital **Giro** • Giro Rupiah dan Giro Valas • VIP Giro Rupiah dan VIP Giro Valas **Deposito** • Deposito Rupiah • Deposito USD • Deposito Online	**Savings** • Victoria Savings • VIP Safe Savings • Victoria Junior Savings • Victoria Business Savings • TabunganKu • Victoria Maxima Savings • Victoria EduSave Savings • VIP Safe Digital Savings **Demand Deposit** • Rupiah Current Account and Foreign Current Account • VIP Rupiah Current Account and VIP Foreign Current Account **Time Deposits** • Rupiah Time Deposits • USD Time Deposits • Online Deposits
Produk Pinjaman Loan Products	**Kredit Produktif** • *Corporate Lending* • *Commercial Lending* • *Small Medium Enterprise Lending* • *Multi Finance Lending* • Bank Garansi • Surat Kredit Berdokumen Dalam Negeri (SKBDN) • L/C (*Letter of Credit*) **Kredit Konsumtif** • Kredit Pemilikan Rumah • Kredit Pemilikan Mobil • Kredit Multi Guna • Kredit *Implant Banking*	**Productive Loans** • Corporate Lending • Commercial Lending • Small Medium Enterprise Lending • Multi Finance Lending • Bank Guarantee • Domestic Letter of Credit (SKBDN) • L/C (Letter of Credit) **Consumptive Loans** • Home Ownership Loan • Car Ownership Loan • Multi-Purpose Loan • Implant Banking Loan
Jasa Layanan Lainnya Other Services	• Kliring/Warkat Debit • Transfer (SKNBI, BI-FAST, BI-RTGS) • Pembayaran Tagihan (PLN, Telkom, PDAM, BPJS) • Kartu ATM • *Auto Save* • *Auto Debet* • *Internet Banking* dan *Mobile Banking* Victoria • Layanan Penerimaan Negara (Pajak) • Jual Beli Bank *Notes*	• Clearing/Debit Draft • Transfer (SKNBI, BI-FAST, BI-RTGS) • Billing Payment (PLN, Telkom, PDAM, BPJS) • ATM Card • Auto Save • Auto Debet • Victoria Internet Banking and Mobile Banking • State Revenue Service (Tax) • Sale and Purchase of Bank Notes
Layanan Bank Devisa Foreign Exchange |Bank Services	• Transaksi Kiriman Uang (*Remittance*) • Perdagangan Internasional • *Treasury* dan Layanan Interbank Lainnya	• Remittance • International Trade Finance • Treasury and Other Interbank Services
Produk Investasi Investment Products	• Surat Berharga Negara (SBN) • Reksa Dana • *Bancassurance*	• Government Bonds (SBN) • Mutual Funds • Bancassurance

"Informasi lengkap terkait produk dan layanan Bank Victoria dapat diakses melalui situs web Bank yang beralamat di www.victoriabank.co.id."
"Complete information regarding Bank Victoria products and services can be accessed through the Bank's website at www.victoriabank.co.id."

Wilayah Operasional [POJK C.3]
Operational Areas



1 Kantor Pusat
Head Office

14 Kantor Cabang Utama
Main Branch Offices

24 Kantor Cabang Pembantu
Sub-Branch Offices

Bank Victoria memiliki jaringan distribusi dan pemasaran yang tersebar di 10 (sepuluh) Kota Besar di Indonesia sehingga mudah dijangkau guna mendukung penjualan produk yang unggul dan layanan perbankan yang andal. Jaringan kantor Bank Victoria pada 3 (tiga) tahun terakhir diuraikan sebagai berikut:

Bank Victoria has distribution and marketing networks spread across 10 (ten) Major Cities in Indonesia, making it easily accessible to support the sales of excellent products and reliable banking services. Bank Victoria's office network in the past 3 (three) years is described as follows:

Jaringan Kantor
Office Network

Kantor	2024	2023	2022	Office
Kantor Pusat	**1**	1	1	Head Office
Kantor Cabang Utama	**14**	14	14	Main Branch Office
Kantor Cabang Pembantu	**24**	24	24	Sub-Branch Office
Jaringan Kantor Lain (Kantor Kas, *Payment Point*, dan Lainnya)	**-**	-	-	Other Office Network (Cash Office, Payment Point, and Others)
Total	**39**	**39**	**39**	**Total**



Jaringan Kantor per Wilayah Tahun 2024
Office Network by Region in 2024

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

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

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

Kantor Pusat
Head Office

PT Bank Victoria International Tbk

Gedung Graha BIP Lantai 10
Graha BIP Building 10th Floor
Jl. Gatot Subroto Kav. 23
Jakarta Selatan / South Jakarta 12930

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

Kantor Cabang Utama
Main Branch Offices

KCU BIP
Gedung Graha BIP Lantai Dasar
Jl. Gatot Subroto Kav. 23
Jakarta Selatan /
South Jakarta 12930
T : (021) 5258 208
F : (021) 5258 028

KCU Bali
Jl. Raya Imam Bonjol No. 117
Dusun BR. Tenten
Bali 80114
T : (0361) 8451 000
F : (0361) 8451 010

KCU Bandung
Jl. Braga No. 16
Kel. Braga, Kec. Sumur Bandung
Bandung, Jawa Barat /
West Java 40111
T : (022) 4266 846
F : (022) 4266 845

KCU Bogor
Jl. Pakuan No. 8
Kel. Baranangsiang, Kec. Bogor Timur
Bogor, Jawa Barat / West Java 16143
T : (0251) 8343 800 (*Hunting*)
(0251) 8343 804
(0251) 8343 806
(0251) 8343 805 (*Direct*)
F : (0251) 8343 807

KCU Cideng
Jl. Cideng Timur No. 33
Kel. Petojo Utara, Kec. Gambir
Jakarta Pusat /
Central Jakarta 10130
T : (021) 6338 913
F : (021) 6338 914

KCU Fatmawati
Jl. RS Fatmawati No. 85A
Cipete Utara, Kebayoran Baru
Jakarta Selatan /
South Jakarta 12150
T : (021) 7201 496
F : (021) 7201 497

KCU Kelapa Gading
Jl. Taman Mandiri I No. 8 Kav. A1-B1
Kelapa Gading Timur
Jakarta Utara / North Jakarta 14240
T : (021) 4514 012
F : (021) 4514 013

KCU Makassar
Ruko Poros Boulevard/Ruko Emerald No. 16
Jl. Boulevard Masale
Kel. Masale, Kec. Panakukang
Makassar, Sulawesi Selatan /
South Sulawesi 90231
T : (0411) 4093 171
F : (0411) 4093 262

KCU Manado
Jl. Walter Monginsidi Komplek
Ruko Bahu Mall
Blok E No. 5
Kel. Bahu, Kec. Malalayang
Manado, Sulawesi Utara /
North Sulawesi 95115
T : (0431) 831 431
F : (0431) 831 427

KCU Medan
Jl. Zainal Arifin No. 53C
Kel. Madras Hulu
Kec. Medan Polonia
Medan, Sumatera Utara /
North Sumatera 20153
T : (061) 8051 0979
F : (061) 4576 274

KCU Semarang
Jl. MT Haryono 864-866
Kel. Peterongan
Kec. Semarang Selatan
Jawa Tengah / Central Java 50242
T : (024) 3531 8038
F : (024) 3531 8039

KCU Senayan
Gedung Bank Panin Senayan
Lantai Dasar
Jl. Jenderal Sudirman No. 1
Kel. Gelora, Jakarta Selatan /
South Jakarta 12710
T : (021) 5735 425
F : (021) 5735 429

KCU Solo
Jl. Slamet Riyadi No. 332D
Kel. Purwosari, Kec. Laweyan
Surakarta Jawa Tengah / Central Java 57141
T : (0271) 6011 005
F : (0271) 6011 006

KCU Surabaya
Jl. Raya Darmo No. 173
Kel. Darmo, Kec. Wonokromo
Surabaya 60241
T : (031) 5670 778 (*Hunting*)
F : (031) 5670 775

Kantor Cabang Pembantu
Sub-Branch Offices

KCP BSD
Bumi Serpong Damai Sektor IV
Blok RE No. 52
Kel. Lengkong Wetan, Kec. Serpong
Tangerang 15318
T : (021) 5315 2783
F : (021) 5315 2785

KCP Central Park
Garden Shopping Arcade B/08/BG
Jl. Tanjung Duren Raya Kav. 5-9
Tanjung Duren, Jakarta Barat /
West Jakarta 11470
T : (021) 2920 6257
F : (021) 2920 6258

KCP Citra Dua
Rukan Citra Niaga Blok A/5
Kel. Pegadungan, Kec. Kalideres
Jakarta Barat / West Jakarta11830
T : (021) 5437 6656
F : (021) 5437 6695

KCP Duta Mas
Komplek Perumahan Taman Duta Mas
Blok D8 No. 12
Kel. Wijaya Kusuma, Kec. Grogol
Petamburan
Jakarta Barat / West Jakarta 11460
T : (021) 5697 9990
F : (021) 5697 9996

KCP Duta Merlin
Komplek Pertokoan Duta Merlin
Blok A No. 10
Jl. Gajah Mada No. 3-5
Kel. Petojo Utara, Kec. Gambir
Jakarta Pusat / Central Jakarta 10160
T : (021) 6386 5970
F : (021) 6386 5971

KCP Gading Serpong
Ruko Rodeo Drive Blok B No. 6
Jl. Boulevard Gading Serpong
Kel. Pakulonan Barat
Kec. Kelapa Dua
Tangerang 15333
T : (021) 5421 7245
F : (021) 5421 7247

KCP Grand Wijaya
Komplek Grand Wijaya Blok C No. 10
Jl. Wijaya II
Kel. Pulo, Kec. Kebayoran Baru
Jakarta Selatan / South Jakarta 12160
T : (021) 7200 009
F : (021) 7202 878

KCP Green Garden
Komplek Green Garden Blok A 14 No. 28
Jl. Panjang Kedoya Utara
Kel. Kedoya Utara, Kec. Kebon Jeruk
Jakarta Barat / West Jakarta 11520
T : (021) 5835 6803
F : (021) 5835 6844

KCP Kebon Jeruk
Komplek Pertokoan Intercon
Blok B No. 4-5
Jl. Meruya Ilir Raya
Kel. Srengseng, Kec. Kembangan
Jakarta Barat / West Jakarta 11620
T : (021) 5874 427
F : (021) 5842 379

KCP Kelapa Gading Boulevard
Komplek Ruko Kelapa Gading
Blok LC-6 No. 14
Jl. Raya Boulevard Barat
Kel. Kelapa Gading Barat
Kec. Kelapa Gading
Jakarta Utara / North Jakarta 14240
T : (021) 4507 672
F : (021) 4528 854

KCP Kemang
Jl. Kemang Raya No. 82 C
Kel. Bangka, Kec. Mampang Prapatan
Jakarta Selatan /
South Jakarta 12730
T : (021) 7193 521
F : (021) 7193 721

KCP Mandala Tomang
Lobby Gedung Mandala Airlines
Jl. Tomang Raya No. 33-37
Kel. Tomang, Kec. Grogol Petamburan
Jakarta Barat / West Jakarta 11440
T : (021) 5697 2227
F : (021) 5697 2237

KCP Muara Karang 2
Jl. Pluit Karang Utara No. 46
Blok I1 Selatan Kav. 48
Penjaringan
Jakarta Utara / North Jakarta 14450
T : (021) 6604 144
F : (021) 6604 116

KCP Pantai Indah Kapuk
Bukit Golf Mediterania Blok B/18
Pantai Indah Kapuk
Kel. Kamal Muara, Kec. Penjaringan
Jakarta Utara / North Jakarta 14460
T : (021) 5694 5973
F : (021) 5694 5974

KCP Patal Senayan
Rukan Permata Senayan Blok B No. 6
Jl. Tentara Pelajar
Kel. Grogol Utara
Kec. Kebayoran Lama
Jakarta Selatan / South Jakarta 12210
T : (021) 5794 0668
F : (021) 5794 0667

KCP Pecenongan
Jl. Pecenongan Raya No. 26
Kel. Kebon Kelapa, Kec. Gambir
Jakarta Pusat / Central Jakarta 10120
T : (021) 386 5627
F : (021) 386 5637

KCP Pondok Indah
Plaza Pondok Indah Blok II
Blok UPS No. 51
Jl. Metro Pondok Indah
Kel. Pondok Pinang,
Kec. Kebayoran Lama
Jakarta Selatan /
South Jakarta 12310
T : (021) 7591 5628
F : (021) 7591 5625

KCP Puri Indah
Komplek Puri Indah Blok A No. 3
Jl. Puri Indah Raya
Kel. Kembangan Selatan
Kec. Kembangan
Jakarta Barat / West Jakarta 11610
T : (021) 582 0216
F : (021) 582 0217

KCP Hangtuah
Jl. Hang Tuah Raya No.4 Lantai 2
Kel. Gunung, Kec. Kebayoran Baru
Jakarta Selatan / South Jakarta 12120
T : (021) 2904 4280
F : (021) 2904 4281

KCP Sunter
Komplek Rukan Sunter Permai Blok A-9
Jl. Danau Sunter Utara
Kel. Sunter Agung, Kec. Tanjung Priok
Jakarta Utara / North Jakarta 14350
T : (021) 6530 7347
F : (021) 6530 7348

KCP Taman Palem Lestari
Ruko Taman Palem Blok D1 No. 19D
Kel. Cengakareng Barat
Kec. Cengkareng
Jakarta Barat / West Jakarta 11730
T : (021) 5596 0771
F : (021) 5596 0772

KCP Tanah Abang Blok B
Jl. KH Fachrudin
Pertokoan Grosir Mall Tanah Abang
Blok B Lantai 5
Loss Ktr No. 2
Kel. Kampung Bali, Kec. Tanah Abang
Jakarta Pusat /
Central Jakarta 10240
T : (021) 831 431
F : (021) 831 427

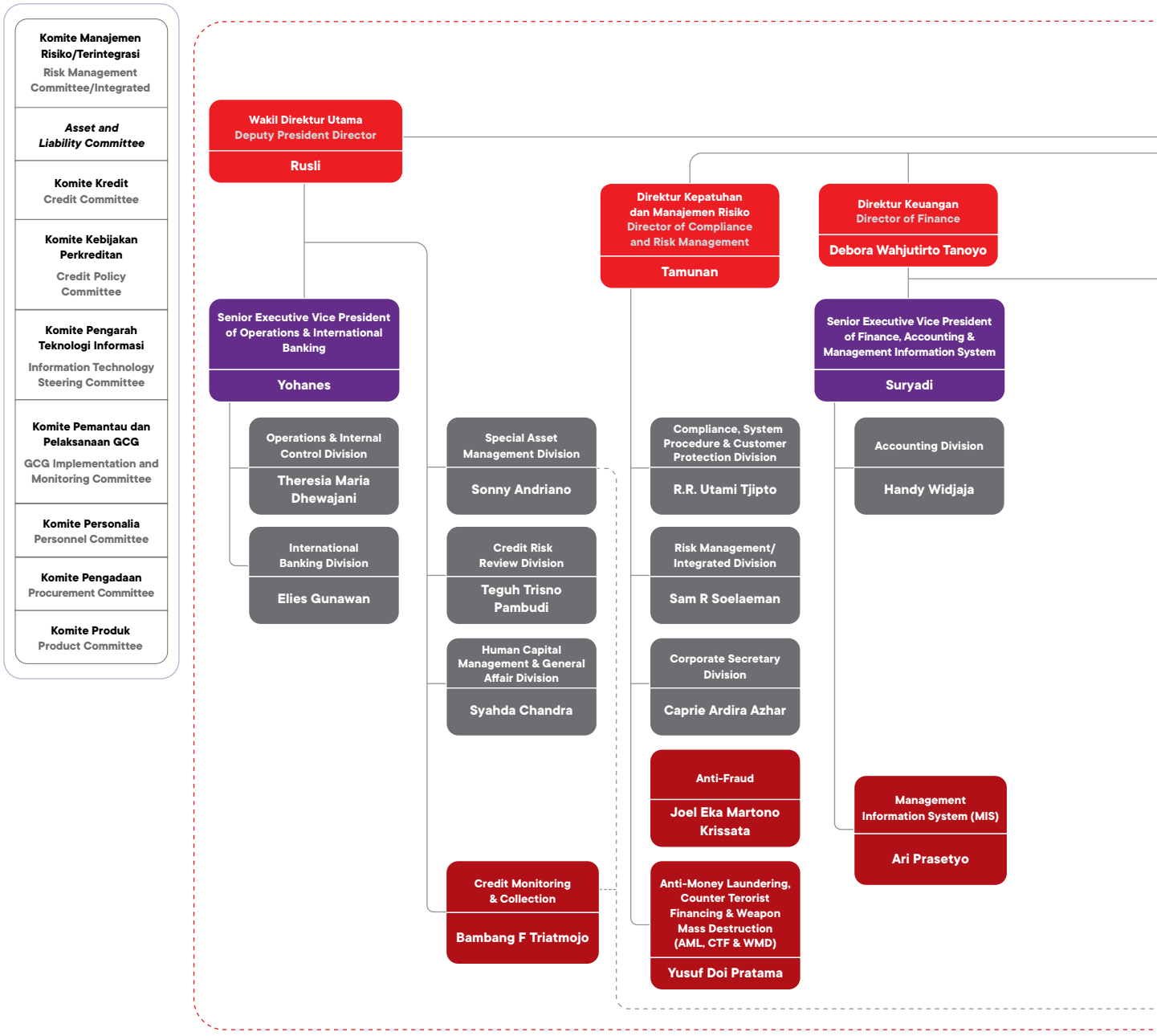
KCP Wisma Indocement
Wisma Indocement Lantai Dasar
Jl. Jenderal Sudirman Kav. 70–71
Kel. Setibudi, Kec. Setiabudi
Jakarta Selatan / South Jakarta 12970
T : (021) 5223 765
F : (021) 5223 762

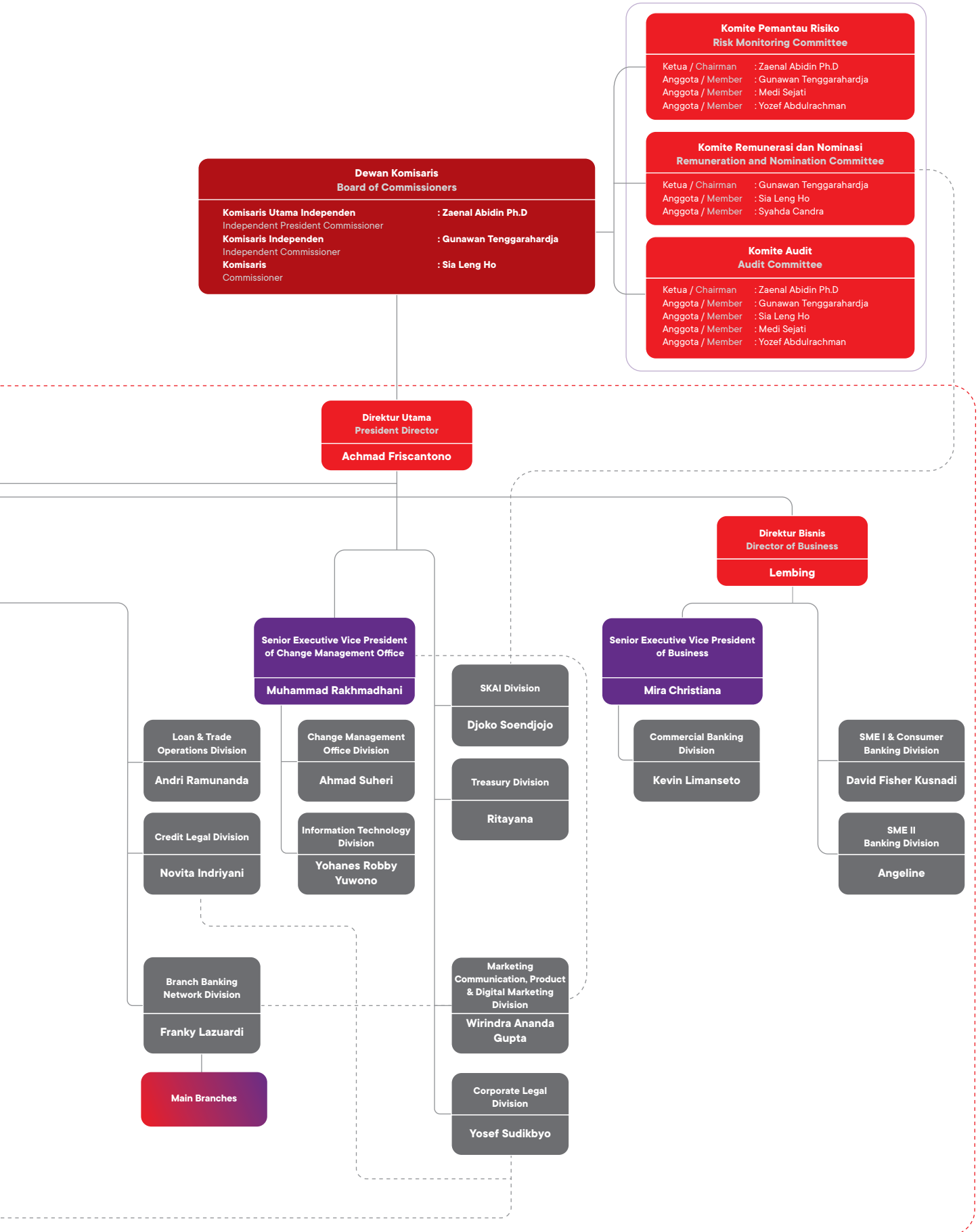
KCP Wisma Slipi
Wisma Slipi Lantai Dasar
Jl. Letnan Jenderal S Parman Kav. 12
Kel. Kemanggisan, Kec. Palmerah
Jakarta Barat / West Jakarta 11480
T : (021) 5308 800
F : (021) 5307 207

Struktur Organisasi
Organization Structure

Pada tahun 2024, Bank Victoria telah melakukan penyempurnaan Struktur Organisasi dalam rangka mendukung tujuan dan sasaran Bank yang telah disahkan dalam Surat Keputusan Direksi No. 007/SK-DIR/09/24 tanggal 26 September 2024 tentang Struktur Organisasi, sebagai berikut:

In 2024, Bank Victoria refined its Organization Structure to support the Bank's goals and objectives, which was ratified in the Board of Directors' Decision Letter No. 007/SK-DIR/09/24 dated 26 September 2024 on the Organization Structure, as follows:




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

Daftar Keanggotaan dalam Asosiasi [POJK C.5]

List of Association Membership

Hingga akhir tahun 2024, Bank Victoria tercatat sebagai anggota pada asosiasi/organisasi berikut:

Until the end of 2024, Bank Victoria is registered as a member of the following associations/organizations:

Nama Asosiasi Name of Association	Skala Asosiasi Scale of Association
Lembaga Penjamin Simpanan Indonesia Deposit Insurance Corporation	Nasional National
PT Kustodian Sentral Efek Indonesia Indonesia Central Securities Depository	Nasional National
Perhimpunan Bank-Bank Umum Nasional (PERBANAS) Association of National Commercial Banks (PERBANAS)	Nasional National
Asosiasi Emiten Indonesia (AEI) Indonesian Public Listed Companies Association (AEI)	Nasional National
Ikatan Bankir Indonesia (IBI) Indonesian Banker Institute (IBI)	Nasional National
***Bankers Association for Risk Managemet* (BARA)**	Nasional National
Lembaga Alternatif Penyelesaian Sengketa Perbankan Indonesia (LAPSPI) Indonesian Alternative Agencies for Banking Dispute Resolution (LAPSPI)	Nasional National
***Indonesian Corporate Secretary Association* (ICSA)**	Nasional National
Asosiasi Sistem Pembayaran Indonesia (ASPI) Association of Indonesian Payment Systems (ASPI)	Nasional National
Perhimpunan Pedagang Surat Hutang (HIMDASUN) Indonesian Government Bond Traders Association (HIMDASUN)	Nasional National
Forum Komunikasi Direktur Kepatuhan Perbankan (FKDKP) Communication Forum for Director of Banking Compliance (FKDKP)	Nasional National
Forum Komunikasi Direktur Operasional Perbankan (FKDOP) Communication Forum for Director of Operations (FKDOP)	Nasional National

Profil Dewan Komisaris
Board of Commissioners Profile



ZAENAL ABIDIN Ph.D

Komisaris Utama Independen
Independent President Commissioner

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Sukabumi

Usia / Age
61 tahun / years old

Domisili / Domicile
Depok

Hubungan Afiliasi
Affiliation Relationship

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

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

Pernyataan Independensi
Statement of Independence

Beliau telah menjabat menjabat 4 (empat) periode sebagai Komisaris Independen dan telah menandatangani surat pernyataan independensi.

He has served for 4 (four) terms as Independent Commissioner and has signed a statement of independence.

Dasar Pengangkatan dan Periode Menjabat

Sebagai Komisaris Utama Independen:
Keputusan RUPS Tahunan tanggal 3 Juni 2022 (2022-2025).

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

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

Rangkap Jabatan Saat Ini

Di dalam Bank Victoria:
- Ketua Komite Audit Bank Victoria (sejak 2022); dan
- Ketua Komite Pemantau Risiko Bank Victoria (sejak 2024).

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

Riwayat Jabatan Sebelumnya
- *Pro Manager Treasury* dan Analisa Bidang Dana Perbankan Bank Summa (1989-1992);
- Peneliti Senior GCG Indonesia Institute Corporate Governance (2008-2018);
- Koordinator Staf Khusus Bidang Riset Asosiasi Perbanas (2011-2012);
- Dosen Sekolah Tinggi Ilmu Ekonomi Indonesia Banking School (2013-2019);
- Ketua Komite Pemantau Risiko Bank Victoria (2013-2022);
- Ketua Komite Tata Kelola Terintegrasi Grup Victoria (2015-2021);
- Komisaris Independen PT Sumberdaya Sewatama (2021-2023); dan
- Anggota Komite Pemantau Risiko Bank Victoria (2022-2024).

Sertifikasi
- Sertifikasi bidang Kepatuhan Perbankan Level Eksekutif dari Lembaga Sertifikasi Profesi Perbankan (2020-sekarang);
- Sertifikasi bidang Keahlian Profesi Pasar Modal sebagai Wakil Manajer Investasi dari The Indonesia Capital Market Institute (2018-sekarang);
- Sertifikasi bidang Manajemen Risiko Level Utama dari Lembaga Sertifikasi Profesi Pasar Modal (2019-sekarang);
- Sertifikasi bidang Asesor Kompetensi Level Asesmen/Uji Kompetensi dari Lembaga Sertifikasi Profesi Perbankan (2019-sekarang);
- Sertifikasi bidang Manajemen Risiko Perbankan Level 2 dari Lembaga Sertifikasi Profesi Perbankan (2021-2025); dan
- Sertifikasi bidang Manajemen Risiko Perbankan Kualifikasi 6 dari Lembaga Sertifikasi Profesi Perbankan (2024-2027).

Penilaian Uji Kemampuan dan Kepatutan

Sebagai Komisaris Utama Independen:
Telah lulus *fit and proper test* dari OJK tanggal 28 Oktober 2022.

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

Basis of Appointment and Term of Office

As Independent President Commissioner:
Annual GMS Resolutions dated 3 June 2022 (2022-2025).

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

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

Current Concurrent Positions

In Bank Victoria:
- Chairman of Audit Committee of Bank Victoria (since 2022); and
- Chairman of Risk Monitoring Committee of Bank Victoria since (since 2024).

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

History of Previous Positions
- Pro Manager Treasury and Analysis in Banking Fund Sector of Bank Summa (1989-1992);
- GCG Senior Researcher of Indonesia Institute of Corporate Governance (2008-2018);
- Coordinator of Special Staff of Research Field of Perbanas Association (2011-2012);
- Lecturer of Sekolah Tinggi Ilmu Ekonomi Indonesia Banking School (2013-2019);
- Chairman of Risk Monitoring Committee of Bank Victoria (2013-2022);
- Chairman of Integrated Governance Committee of Victoria Group (2015-2021);
- Independent Commissioner of PT Sumberdaya Sewatama (2021-2023); and
- Member of Risk Monitoring Committee of Bank Victoria (2022-2024).

Certification
- Certification in Banking Compliance Executive Level from Banking Profession Certification Institute (2020-present);
- Certification in Capital Market Professional Expertise as Deputy Investment Manager from The Indonesia Capital Market Institute (2018-present);
- Certification in Risk Management Main Level from the Banking Profession Certification Institute (2019-present);
- Certification in Competency Assessment, Assessment Level/ Competency Test from Banking Profession Certification Institute (2019-present);
- Certification in Banking Risk Managemen Level 2 from Banking Profession Certification Institute (2021- 2025); and
- Certification in Banking Risk Management Qualification 6 from Banking Profession Certification Institution (2024-2027).

Fit and Proper Test

As Independent President Commissioner:
Passed the fit and proper test from OJK on 28 October 2022.

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



GUNAWAN TENGGARAHARDJA

Komisaris Independen
Independent Commissioner

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Malang

Usia / Age
69 tahun / years old

Domisili / Domicile
Jakarta

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

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

Rangkap Jabatan Saat Ini
Di dalam Bank Victoria:
- Ketua Komite Remunerasi dan Nominasi Bank Victoria (sejak 2012); dan
- Anggota Komite Pemantau Risiko Bank Victoria (sejak 2024).

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

Riwayat Jabatan Sebelumnya
- *International Field Engineer 1 Schlumberger* OSA (1982-1984);
- *Assistant Manager* PT Bank Bali (1985-1988);
- *General Manager* PT Sampoerna Transport Nusantara (PT HM Sampoerna) (1989-1992);
- Direktur Eksekutif PT Duta Pertiwi Tbk (1992- 1996);
- Direktur PT Bhuwanatala Indah Permai Tbk (1996-1998);
- Komisaris Utama PT Sigma Karya Sempurna (Bali Camp) (1998-2004);
- Ketua Komite Pemantau Risiko Bank Victoria (2015-2022);
- Anggota Komite Tata Kelola Terintegrasi Bank Victoria (2017-2021); dan
- Ketua Komite Pemantau Risiko Bank Victoria (2022-2024).

Sertifikasi
- Sertifikasi bidang Manajemen Risiko Perbankan Level 5 dari Lembaga Sertifikasi Profesi Perbankan (2021-2023); dan
- Sertifikasi bidang Manajemen Risiko Perbankan Kualifikasi 7 dari Lembaga Sertifikasi Profesi Perbankan (2024-2027).

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

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

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

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

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

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

Current Concurrent Positions
In Bank Victoria:
- Chairman of Remuneration and Nomination Committee of Bank Victoria (since 2012); and
- Member of Risk Monitoring Committee of Bank Victoria (since 2024).

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

History of Previous Positions
- International Field Engineer 1 of Schlumberger OSA (1982-1984);
- Assistant Manager of PT Bank Bali (1985-1988);
- General Manager of PT Sampoerna Transport Nusantara (PT HM Sampoerna) (1989-1992);
- Executive Director of PT Duta Pertiwi Tbk (1992- 1996);
- Director of PT Bhuwanatala Indah Permai Tbk (1996-1998);
- President Commissioner of PT Sigma Karya Sempurna (Bali Camp) (1998-2004);
- Chairman of Audit Committee of Bank Victoria (2015-2022);
- Member of Integrated Governance Committee of Bank Victoria (2017-2021); and
- Chairman of Risk Monitoring Committee of Bank Victoria (2022-2024).

Certification
- Risk Management Certification Level 5 from Banking Profession Certification Institute (2021-2023); and
- Certification in Banking Risk Management Qualification 7 from Banking Profession Certification Institution (2024-2027).

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

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

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

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



SIA LENG HO

Komisaris
Commissioner

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Jakarta

Usia / Age
65 tahun / years old

Domisili / Domicile
Jakarta

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

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

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

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

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

Sertifikasi
- Sertifikasi bidang Manajemen Risiko Perbankan Level 5 dari Manajemen Risiko Perbankan Level 5 dari Lembaga Sertifikasi Profesi Perbankan (2022-2024); dan
- Sertifikasi bidang Manajemen Risiko Perbankan Kualifikasi 7 dari Lembaga Sertifikasi Profesi Perbankan (2024-2027).

Penilaian Uji Kemampuan dan Kepatutan
Telah lulus *fit and proper test* dari OJK tanggal 28 Oktober 2022.

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

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

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

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

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

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

Certification
- Certification in Banking Risk Management Level 5 from Banking Risk Management Level 5 from Banking Profession Certification Institution (2022-2024); and
- Certification in Banking Risk Management Qualification 7 from Banking Profession Certification Institution (2024-2027).

Fit and Proper Test
Passed the fit and proper test from OJK on 28 October 2022.

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

Perubahan Komposisi Anggota Dewan Komisaris
Pada tahun 2024, komposisi anggota Dewan Komisaris Bank Victoria tidak mengalami perubahan sesuai keputusan RUPS Tahunan yang diselenggarakan pada tanggal 14 Juni 2024.

Changes to the Composition of Board of Commissioners
In 2024, there were no changes to the composition of the Board of Commissioners of Bank Victoria in accordance with the resolutions of Annual GMS held on 14 June 2024.

Profil Direksi
Board of Directors Profile



ACHMAD FRISCANTONO

Direktur Utama
President Director

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
San Francisco

Usia / Age
63 tahun / years old

Domisili / Domicile
Jakarta

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

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

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

Di luar Bank Victoria:
Tidak ada.

Riwayat Jabatan Sebelumnya
- *Senior Assistant Manager Divison Treasury* PT Bank Internasional Indonesia Tbk (1990-1994);
- *Manager Divison Treasury* PT Bank Namura Internusa (1994-1996);
- *Senior Manager Divison Treasury* dan *Divison International* PT Bank Rama Tbk (1996-2000);
- Kepala Risiko Likuiditas (*Senior Assistant Vice President*) Market dan Likuiditas Risiko Divisi PT Bank Danamon Indonesia Tbk (2000-2006);
- *Treasury and Financial Institution Head (Executive Vice President)* PT Bank Tabungan Pensiun Nasional Tbk (2006-2016);
- *Executive Director* Perbanas (2017-2021); dan
- Komisaris Utama PT Bank Victoria Syariah (2019-2022).

Sertifikasi
- Sertifikasi bidang Manajemen Risiko Level 5 dari Lembaga Sertifikasi Profesi Perbankan (2022-2024); dan
- Sertifikasi bidang Manajemen Risiko Perbankan Kualifikasi 7 dari Lembaga Sertifikasi Profesi Perbankan (2024-2027).

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

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

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

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

Current Concurrent Positions
In Bank Victoria:
None.

Outside of Bank Victoria:
None.

History of Previous Positions
- Senior Assistant Manager of Treasury Division of PT Bank Internasional Indonesia Tbk (1990-1994);
- Treasury Division Manager of PT Bank Namura Internusa (1994-1996);
- Senior Manager of Treasury Division and International Division of PT Bank Rama Tbk (1996-2000);
- Head of Market Liquidity Risk (Senior Assistant Vice President) and Division Liquidity Risk of PT Bank Danamon Indonesia Tbk (2000-2006);
- Treasury and Financial Institution Head (Executive Vice President) of PT Bank Tabungan Pensiun Nasional Tbk (2006-2016); and
- Executive Director Perbanas (2017-2021); and
- President Commissioner of PT Bank Victoria Syariah (2019-2022).

Certification
- Certification in Risk Management Level 5 from Banking Profession Certification Institution (2022-2024); and
- Certification in Banking Risk Management Qualification 7 from Banking Profession Certification Institution (2024-2027).

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

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



RUSLI

Wakil Direktur Utama
Deputy President Director

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Tebing Tinggi

Usia / Age
53 tahun / years old

Domisili / Domicile
Jakarta

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

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

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

Di luar Bank Victoria:
Tidak ada.

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

Sertifikasi
- *Omega Credit Certification* (2015);
- Sertifikasi bidang *Treasury Dealer Level Advance* dari Lembaga Sertifikasi Profesi Perbankan (2021-2024);
- Sertifikasi bidang Manajemen Risiko Perbankan Level 5 dari Lembaga Sertifikasi Profesi Perbankan (2021-2023); dan
- Sertifikasi bidang Manajemen Risiko Perbankan Kualifikasi 7 dari Lembaga Sertifikasi Profesi Perbankan (2024-2027).

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

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

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

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

Current Concurrent Positions
In Bank Victoria:
None.

Outside of Bank Victoria:
None.

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

Certification
- Omega Credit Certification (2015);
- Certification in Treasury Dealer Advanced Level from Banking Profession Certification Institute (2021-2024);
- Certification in Banking Risk Management Level 5 from Banking Profession Certification Institution (2021-2023); and
- Certification in Banking Risk Management Qualification 7 from Banking Profession Certification Institution (2024-2027).

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

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



LEMBING

Direktur Bisnis
Director of Business

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Pekanbaru

Usia / Age
60 tahun / years old

Domisili / Domicile
Jakarta

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

Riwayat Pendidikan
Sarjana Ekonomi dari Universitas Tarumanagara (1989).

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

Di luar Bank Victoria:
Tidak ada.

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

Sertifikasi
- Sertifikasi bidang Manajemen Risiko Perbankan Level 5 dari Lembaga Sertifikasi Profesi Perbankan (2022-2024); dan
- Sertifikasi bidang Manajemen Risiko Perbankan Kualifikasi 7 dari Lembaga Sertifikasi Profesi Perbankan (2024-2027).

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

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

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

Education
Bachelor of Economic from Tarumanagara University (1989).

Current Concurrent Positions
In Bank Victoria:
None.

Outside of Bank Victoria:
None.

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

Certification
- Risk Management Certification Level 5 for Banking from Banking Profession Certification Institute (2022-2024); and
- Certification in Banking Risk Management Qualification 7 from Banking Profession Certification Institution (2024-2027).

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

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



DEBORA WAHJUTIRTO TANOYO

Direktur Keuangan
Director of Finance

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Surabaya

Usia / Age
39 tahun / years old

Domisili / Domicile
Jakarta

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

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

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

Di luar Bank Victoria:
Tidak ada.

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

Sertifikasi
- Sertifikasi bidang Manajemen Risiko Perbankan Level 5 dari Lembaga Sertifikasi Profesi Perbankan (2022-2024); dan
- Sertifikasi bidang Manajemen Risiko Perbankan Kualifikasi 7 dari Lembaga Sertifikasi Profesi Perbankan (2024-2027).

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

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

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

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

Current Concurrent Positions
In Bank Victoria:
None.

Outside of Bank Victoria:
None.

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

Certification
- Risk Management Certification Level 5 for Banking from Banking Profession Certification Institute (2022-2024); and
- Certification in Banking Risk Management Qualification 7 from Banking Profession Certification Institution (2024-2027).

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

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



TAMUNAN

Direktur Kepatuhan dan Manajemen Risiko
Director of Compliance and Risk Management

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Banjarmasin

Usia / Age
59 tahun / years old

Domisili / Domicile
Jakarta

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

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

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

Di luar Bank Victoria:
Tidak ada.

Riwayat Jabatan Sebelumnya
- Staf Audit Kantor Akuntan Publik Drs. Santoso, Banjarmasin (1987-1988);
- Kepala Bagian Administrasi dan Umum PT Winduintan Deltatama (Muda Jaya Group) Banjarmasin (1988-1990);
- Kepala Kantor Bank Andromeda, Jakarta (1990-1997);
- Kepala Kantor Bank Alfa, Menara Kebon Sirih, Jakarta (1997-1999);
- Staf Badan Penyehatan Perbankan Nasional (BPPN), Jakarta (1999);
- Manajer Operasional PT Victoria Sekuritas, Jakarta (1999-2001);
- *Head of Operation and Compliance* PT Mahastra Capital, Jakarta (2001-2004);
- *Risk Management & Compliance Division* Bank Victoria, Jakarta (2004-2007); dan
- Direktur Operasi dan IT Bank Victoria, Jakarta (2007-2008).

Sertifikasi
- Sertifikasi bidang *Treasury Dealer Level Advance* dari Lembaga Sertifikasi Profesi Perbankan (2021- 2024);
- Sertifikasi bidang Manajemen Risiko Perbankan Level 5 dari Lembaga Sertifikasi Profesi Perbankan (2021-2023);
- Sertifikasi bidang *Compliance Level Advance* dari Lembaga Sertifikasi Profesi Perbankan (2021-2025); dan
- Sertifikasi bidang Manajemen Risiko Perbankan Kualifikasi 7 dari Lembaga Sertifikasi Profesi Perbankan (2023-2026).

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

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

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

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

Current Concurrent Positions
In Bank Victoria:
None.

Outside of Bank Victoria:
None.

History of Previous Positions
- Audit Staff of Public Accounting Firm of Drs. Santoso, Banjarmasin (1987-1988);
- Head of Administration and General Affairs of PT Winduintan Deltatama (Muda Jaya Group), Banjarmasin (1988-1990);
- Office Head of Bank Andromeda, Jakarta (1990-1997);
- Office Head of Bank Alfa, Menara Kebon Sirih, Jakarta (1997-1999);
- Staff of Indonesian Bank Restructuring Agency (BPPN), Jakarta (1999);
- Manager of Operations of PT Victoria Sekuritas, Jakarta (1999-2001);
- Head of Operations and Compliance of PT Mahastra Capital, Jakarta (2001-2004);
- Risk Management & Compliance Division of Bank Victoria, Jakarta (2004-2007); and
- Director of Operations and IT of Bank Victoria, Jakarta (2007-2008).

Certification
- Certification in Treasury Dealer Advanced Level from Banking Profession Certification Institute (2021-2024);
- Certification in Banking Risk Management Level 5 from Banking Profession Certification Institute (2021-2023); and
- Certification in Compliance Advanced Level from Banking Profession Certification Institute (2021-2025); and
- Certification in Banking Risk Management Qualification 7 from Banking Profession Certification Institution (2023-2026).

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

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

Perubahan Komposisi Anggota Direksi
Pada tahun 2024, komposisi anggota Direksi Bank Victoria tidak mengalami perubahan sesuai keputusan RUPS Tahunan yang diselenggarakan pada tanggal 14 Juni 2024.

Changes to the Board of Directors' Composition
In 2024, there were no changes to the composition of the Board of Directors of Bank Victoria in accordance with the resolutions of Annual GMS held on 14 June 2024.

Pejabat Eksekutif
Executive Officer



1. **MUHAMMAD RAKHMADHANI**
   Senior Executive Vice President of Change Management Office

2. **YOHANES**
   Senior Executive Vice President of Operations & International Banking

3. **MIRA CHRISTIANA**
   Senior Executive Vice President of Business

4. **SURYADI**
   Senior Executive Vice President of Finance, Accounting & Management Information System

Berikut ini adalah daftar Pejabat Eksekutif yang menjabat di Bank Victoria per 31 Desember 2024:

The following is a list of Executive Officers who serve in Bank Victoria as of 31 December 2024:

Nama Name	Jabatan Position
Muhammad Rakhmadhani	Senior Executive Vice President of Change Management Office
Yohanes	Senior Executive Vice President of Operations & International Banking
Mira Christiana	Senior Executive Vice President of Business
Suryadi	Senior Executive Vice President of Finance, Accounting & Management Information System
Caprie Ardira Azhar	Kepala Divisi *Corporate Secretary* Head of Corporate Secretary Division
Djoko Soendjojo	Kepala Divisi SKAI Head of SKAI Division
R.R. Utami Tjipto	Kepala Divisi *Compliance, System Procedure & Customer Protection* Head of Compliance, System Procedure & Customer Protection Division
Sam R. Soelaeman	Kepala Divisi *Risk Management/Integrated* Head of Risk Management/Integrated Division
Elies Gunawan	Kepala Divisi *International Banking* Head of International Banking Division
Ritayana	Kepala Divisi *Treasury* Head of Treasury Division
Theresia Maria Dhewajani	Kepala Divisi *Operations & Internal Control* Head of Operations & Internal Control Division
Yosef Sudikbyo	Kepala Divisi *Corporate Legal* Head of Corporate Legal Division
Novita Indriyani	Kepala Divisi *Credit Legal* Head of Credit Legal Division
Teguh Trisno Pambudi	Kepala Divisi *Credit Risk Review* Head of Credit Risk Review Division
David Fisher Kusnadi	Kepala Divisi SME I & *Consumer Banking* Head of SME I & Consumer Banking Division
Angeline	Kepala Divisi SME II *Banking* Head of SME II Banking Division
Franky Lazuardi	Kepala Divisi *Branch Banking Network* Head of Branch Banking Network Division
Andri Ramunanda	Kepala Divisi *Loan & Trade Operations* Head of Loan & Trade Operations Division
Sonny Andryano	Kepala Divisi *Special Asset Management* Head of Special Asset Management Division
Syahda Candra	Kepala Divisi *Human Capital Management & General Affair* Head of Human Capital Management & General Affair Division
Handy Widjaja	Kepala Divisi *Accounting* Head of Accounting Division
Bambang F Triatmojo	Wakil Kepala Divisi *Credit Monitoring & Collection* Vice Head of Credit Monitoring & Collection Division
Yusuf Doi Pratama	Kepala Departemen *Anti Money Laundering* (AML), *Counter Terorist Financing* (CTF) & *Weapon Mass Destruction* (WMD) Head of Anti Money-Laundering (AML), Counter-Terrorist Financing (CTF) & Weapon Mass Destruction (WMD) Department
Joel Eka Martono Krissata	Kepala Departemen *Anti-Fraud* Head of Anti-Fraud Department

Pendidikan dan/atau Pelatihan Pejabat Eksekutif
Education and/or Training of Executive Officers

Nama Name	Jabatan Position	Materi Material	
Muhammad Rakhmadhani	Senior Executive Vice President of Change Management Office	• *Expert Sharing*: Keuangan Berkelanjutan (oleh Bank Victoria); • *Dealing With* VUCA *Challenges*: *Contextual Leadership Journey* (oleh Bank Victoria); • *Corporate Culture* dan *Service* (oleh Bank Victoria); • *Sharing Session*: Menjalin Silaturahmi dalam Kebersamaan (oleh Bank Victoria); • Alibaba Cloud AI *Conference* (oleh Alibaba Cloud Indonesia); • Program Pengkinian Sertifikasi Manajemen Risiko Jenjang 7 (oleh Efektif Pro); • Resertifikasi Manajemen Risiko Jenjang 5 (oleh Lembaga Sertifikasi Profesi Perbankan); • *Sharing Session Project* DLP Bank Victoria (oleh PT Indosat Tbk); • *Awareness* Penerapan Peraturan Otoritas Jasa Keuangan Perlindungan Konsumen dan Undang-Undang Perlindungan Data Pribadi (oleh RSM Indonesia); • *Training Data Loss Prevention* pada *Product Blanco, Enforcive* & *Digital Guardian* (oleh PT Indosat Tbk); • *Refreshment* Manajemen Risiko Jenjang 1 - 4 Badan Sertifikasi Manajemen Risiko (oleh Efektif Pro); serta • *Training* Penerapan Strategi *Anti-Fraud* (oleh Victoria Institute).	• Expert Sharing: Sustainable Finance (by Bank Victoria); • Dealing With VUCA Challenges: Contextual Leadership Journey (by Bank Victoria); • Corporate Culture and Service (by Bank Victoria); • Sharing Session: Establishing Relationships in Togetherness (by Bank Victoria); • Alibaba Cloud AI Conference (by Alibaba Cloud Indonesia); • Update Program of Risk Management Certification Level 7 (by Efektif Pro); • Recertification of Risk Management Level 5 (by Banking Profession Certification Institution); • Sharing Session Project of DLP Bank Victoria (by PT Indosat Tbk); • Awareness of Implementation of Financial Services Authority Regulations on Consumer Protection and Personal Data Protection Law (by RSM Indonesia); • Training Data Loss Prevention on Blanco, Enforcive & Digital Guardian Products (by PT Indosat Tbk); • Refreshment of Risk Management Level 1 - 4 Risk Management Certification Institution (by Efektif Pro); and • Training on Anti-Fraud Strategy Implementation (by Victoria Institute).
Yohanes	Senior Executive Vice President of Operations & International Banking	• *Sharing Session*: Semua Dimulai dari Keluarga (oleh Bank Victoria); • *Sharing Session: Learn For Release* (oleh Bank Victoria); • *Expert Sharing*: Keuangan Berkelanjutan (oleh Bank Victoria); • Pendampingan dan Bimbingan Teknis Resertifikasi Manajemen Risiko Jenjang 6 (oleh Bank Victoria); • *Sharing Session: Dream and Faith* (oleh Bank Victoria); • *Dealing With* VUCA *Challenges*: *Contextual Leadership Journey* (oleh Bank Victoria); • Pembekalan: Pendampingan dan Mekanisme Pelaksanaan Resertifikasi Manajemen Risiko Jenjang 6 (oleh Bank Victoria); • *Sharing Session: Blessing in Faithfulness* (oleh Bank Victoria); • Program Pengkinian Sertifikasi Manajemen Risiko Jenjang 6 (oleh Efektif Pro); • *Executive Gathering* ASPI: *Elevating The National Payment System through Collaborative Sinergy* Tahun 2024 (oleh Asosiasi Sistem Pembayaran Indonesia); • *Corporate Culture* dan *Service* (oleh Bank Victoria); • *Sharing Session*: Menjalin Silaturahmi dalam Kebersamaan (oleh Bank Victoria); • *Sharing Session*: Melawan Rasa Takut (oleh Bank Victoria); • *Sharing Session:* Bersyukur dalam Kehidupan (oleh Bank Victoria); • Resertifikasi Manajemen Risiko Jenjang 6 (oleh Lembaga Sertifikasi Profesi Perbankan); • *Sharing Session*: Perubahan Paradigma (oleh Bank Victoria); • *Awareness* Penerapan Peraturan Otoritas Jasa Keuangan Perlindungan Konsumen dan Undang-Undang Perlindungan Data Pribadi (oleh RSM Indonesia); • Partisipasi Bulan Literasi Perdagangan Berjangka Komoditi 2024 (oleh Asosiasi Perdagangan Berjangka Komoditi Indonesia); • *Training* Perlindungan Konsumen dan Perlindungan Data Pribadi (oleh Victoria Institute); • *Refreshment* Manajemen Risiko Level 1 - 4 Badan Sertifikasi Manajemen Risiko (oleh Efektif Pro); • *Training* Penerapan Strategi *Anti-Fraud* (oleh Victoria Institute); • Sertifikasi Sistem Pembayaran dan Pengelolaan Uang Rupiah Jenjang 6: Pengelolaan Uang Tunai (oleh Lembaga Sertifikasi Profesi Sistem Pembayaran Indonesia);	• Sharing Session: Everything Begins with Family (by Bank Victoria); • Sharing Session: Learn For Release (by Bank Victoria); • Expert Sharing: Sustainable Finance (by Bank Victoria); • Mentoring and Technical Guidance for Recertification of Risk Management Level 6 (by Bank Victoria); • Sharing Session: Dream and Faith (by Bank Victoria); • Dealing With VUCA Challenges: Contextual Leadership Journey (by Bank Victoria); • Briefing: Mentoring and Mechanism for Implementing Recertification of Risk Management Level 6 (by Bank Victoria); • Sharing Session: Blessing in Faithfulness (by Bank Victoria); • Update Program of Risk Management Certification Level 6 (by Efektif Pro); • ASPI Executive Gathering: Elevating The National Payment System through Collaborative Synergy in 2024 (by Indonesian Payment System Association); • Corporate Culture and Service (by Bank Victoria); • Sharing Session: Establishing Relationships in Togetherness (by Bank Victoria); • Sharing Session: Fighting the Fear (by Bank Victoria); • Sharing Session: Being Grateful in Life (by Bank Victoria); • Recertification of Risk Management Level 6 (by Banking Profession Certification Institution); • Sharing Session: Paradigm Shift (by Bank Victoria); • Awareness of Implementation of Financial Services Authority Regulations on Consumer Protection and Personal Data Protection Law (by RSM Indonesia); • Participation in Literacy Month on the 2024 Commodity Futures Trading (by Indonesian Commodity Futures Trading Association); • Training on Consumer Protection and Personal Data Protection (by Victoria Institute); • Refreshment of Risk Management Level 1 - 4 Risk Management Certification Institution (by Efektif Pro); • Training on Anti-Fraud Strategy Implementation (by Victoria Institute); • Payment System Certification and Rupiah Money Management Level 6: Cash Management (by Indonesian Payment System Profession Certification Institute);

Nama Name	Jabatan Position	Materi Material	
		• *Refreshment* Tipologi Tindak Pidana Pencucian Uang (TPPU)/Tindak Pidana Pendanaan Terorisme (TPPT)/ Pendanaan Proliferasi Senjata Pemusnah Massal (PPSPM) Melalui Kredit dan *Treasury* (oleh PT Andara Sarana); • *Training* Sistem Pembayaran dan Pengelolaan Uang Rupiah: Pengelolaan Uang Tunai Jenjang 6 (oleh Lembaga Pelatihan Kerja Praveena); • *Coaching* dan *Sharing Session* Kepala Operasional (oleh Bank Victoria); • *Training* Pembekalan Manajemen Risiko Jenjang 6 (oleh PT Arfaidhams Secret); • Uji Sertifikasi Manajemen Risiko Jenjang 6 (oleh Bank Victoria); serta • Pendampingan dan Bimbingan Teknis Resertifikasi Manajemen Risiko Jenjang 6 (oleh Bank Victoria).	• Refreshment of Typology of Money Laundering Crimes (TPPU)/Terrorism Financing Crimes (TPPT)/Proliferation Financing of Weapons of Mass Destruction (PPSPM) through Credit and Treasury (by PT Andara Sarana); • Training on Payment System and Rupiah Money Management: Cash Management Level 6 (by Praveena Job Training Institute); • Coaching and Sharing Session of the Head of Operations (by Bank Victoria); • Briefing Training on Risk Management Level 6 (by PT Arfaidhams Secret); • Certification Test of Risk Management Level 6 (by Bank Victoria); and • Mentoring and Technical Guidance for Recertification of Risk Management Level 6 (by Bank Victoria).
Mira Christiana	Senior Executive Vice President of Business	• *Expert Sharing*: Keuangan Berkelanjutan (oleh Bank Victoria); • Pendampingan dan Bimbingan Teknis Resertifikasi Manajemen Risiko Jenjang 6 (oleh Bank Victoria); • *Training Monitoring* Kredit (oleh Bank Victoria); • *Dealing With* VUCA *Challenges*: *Contextual Leadership Journey* (oleh Bank Victoria); • Pembekalan: Pendampingan dan Mekanisme Pelaksanaan Resertifikasi Manajemen Risiko Jenjang 6 (oleh Bank Victoria); • *Sharing Session*: Menjalin Silaturahmi dalam Kebersamaan (oleh Bank Victoria); • *Training* dan *Outbond* (oleh Bank Victoria); • *Corporate Culture* dan *Service* (oleh Bank Victoria); • *Refreshment* Manajemen Risiko Level 1 - 4 Badan Sertifikasi Manajemen Risiko (oleh Efektif Pro); • *Training* Penerapan Strategi *Anti-Fraud* (oleh Victoria Institute); • *Training* Analisa Laporan Keuangan Industri (oleh Bapak Nur Rohmat); serta • *Refreshment* Tipologi Tindak Pidana Pencucian Uang (TPPU)/Tindak Pidana Pendanaan Terorisme (TPPT)/ Pendanaan Proliferasi Senjata Pemusnah Massal (PPSPM) Melalui Kredit dan *Treasury* (oleh PT Andara Sarana).	• Expert Sharing: Sustainable Finance (by Bank Victoria); • Mentoring and Technical Guidance for Recertification of Risk Management Level 6 (by Bank Victoria); • Training on Credit Monitoring (by Bank Victoria); • Dealing With VUCA Challenges: Contextual Leadership Journey (by Bank Victoria); • Briefing: Mentoring and Mechanism for Implementing Recertification of Risk Management Level 6 (by Bank Victoria); • Sharing Session: Establishing Relationships in Togetherness (by Bank Victoria); • Training and Outbound (by Bank Victoria); • Corporate Culture and Service (by Bank Victoria); • Refreshment of Risk Management Level 1 - 4 Risk Management Certification Institution (by Efektif Pro); • Training on Anti-Fraud Strategy Implementation (by Victoria Institute); • Training on Analysis of Industrial Financial Statements (by Mr. Nur Rohmat); and • Refreshment of Typology of Money Laundering Crimes (TPPU)/Terrorism Financing Crimes (TPPT)/Proliferation Financing of Weapons of Mass Destruction (PPSPM) through Credit and Treasury (by PT Andara Sarana).
Suryadi	Senior Executive Vice President of Finance, Accounting & Management Information System	• *Expert Sharing*: Keuangan Berkelanjutan (oleh Bank Victoria); • *Expert Sharing Session*: Peluang dan Tantangan Pembiayaan Bank pada Bisnis Model *Multi Finance* (oleh Asosiasi Perusahaan Pembiayaan Indonesia); • *Dealing With* VUCA *Challenges*: *Contextual Leadership Journey* (oleh Bank Victoria); • *Corporate Culture* dan *Service* (oleh Bank Victoria); • *Sharing Session*: Menjalin Silaturahmi dalam Kebersamaan (oleh Bank Victoria); • *Anti-Fraud* (oleh HD Entertainment); • *Awareness* Penerapan Peraturan Otoritas Jasa Keuangan Perlindungan Konsumen dan Undang-Undang Perlindungan Data Pribadi (oleh RSM Indonesia); • Pembekalan Manajemen Risiko Jenjang 4 (oleh Lembaga Pengembangan Perbankan Indonesia); • Sertifikasi dan Resertifikasi Manajemen Risiko Jenjang 4 dan 5 (oleh Lembaga Sertifikasi Profesional Perbankan); • *Training* Penerapan Strategi *Anti-Fraud* (oleh Victoria Institute); • Uji Sertifikasi Manajemen Risiko Jenjang 5 (oleh Lembaga Sertifikasi Profesional Perbankan); • *Training* Pembekalan Manajemen Risiko Jenjang 5 (oleh Lembaga Pengembangan Perbankan Indonesia); • *Training* Pembekalan Manajemen Risiko Jenjang 6 (oleh PT Arfaidhams Secret); serta • Uji Sertifikasi Manajemen Risiko Jenjang 6 (oleh Lembaga Sertifikasi Profesional Perbankan).	• Expert Sharing: Sustainable Finance (by Bank Victoria); • Expert Sharing Session: Opportunities and Challenges of Bank Financing in Multi Finance Business Model (by Indonesian Financing Company Association); • Dealing With VUCA Challenges: Contextual Leadership Journey (by Bank Victoria); • Corporate Culture and Service (by Bank Victoria); • Sharing Session: Establishing Relationships in Togetherness (by Bank Victoria); • Anti-Fraud (by HD Entertainment); • Awareness of Implementation of Financial Services Authority Regulations on Consumer Protection and Personal Data Protection Law (by RSM Indonesia); • Briefing of Risk Management Level 4 (by Indonesian Banking Development Institute); • Certification and Recertification of Risk Management Level 4 and 5 (by Banking Professional Certification Institute); • Training on Anti-Fraud Strategy Implementation (by Victoria Institute); • Certification Test of Risk Management Level 5 (by Banking Professionals Certification Institute); • Briefing Training on Risk Management Level 5 (by Indonesian Banking Development Institute); • Briefing Training on Risk Management Level 6 (by PT Arfaidhams Secret); and • Certification Test of Risk Management Level 6 (by Banking Professionals Certification Institute).

Nama Name	Jabatan Position	Materi Material	
Caprie Ardira Azhar	Kepala Divisi *Corporate Secretary* Head of Corporate Secretary Division	• *Innovate, Invest, Inspire: Strategic Planning for Listed Companies in 2024's Stock Market* (oleh Indonesia Corporate Secretary Association); • *Expert Sharing*: Keuangan Berkelanjutan (oleh Bank Victoria); • *Dealing With* VUCA *Challenges: Contextual Leadership Journey* (oleh Bank Victoria); • *Refreshment* Unit Kompetensi Manajemen Risiko Jenjang 5 (oleh Efektif Pro); • Pembekalan: Pendampingan dan Mekanisme Pelaksanaan Resertifikasi Manajemen Risiko Jenjang 6 (oleh Bank Victoria); • *Sharing Session*: Menjalin Silaturahmi dalam Kebersamaan (oleh Bank Victoria); • *Corporate Culture* dan *Service* (oleh Bank Victoria); • *Training* Sosialisasi Office 365 (oleh Bank Victoria); • Resertifikasi Manajemen Risiko Jenjang 5 (oleh Lembaga Sertifikasi Profesi Perbankan); • *Sharing Session Market Update & Economic Outlook* (oleh Bank Victoria); • *Role of Corporate Secretary as BOD Business Partner to Boost Sustainability Awareness* (oleh Indonesia Corporate Secretary Association); • *Training* Perlindungan Konsumen dan Perlindungan Data Pribadi (oleh Victoria Institute); • Pengenalan *International Financial Reporting Standards: Sustainability Disclosure Standards* S1 dan S2 (oleh Indonesia Corporate Secretary Association); • Pendalaman Peraturan Otoritas Jasa Keuangan No. 15/POJK.04/2022 tentang Pemecahan Saham dan Penggabungan Saham oleh Perusahaan Terbuka (oleh Indonesia Corporate Secretary Association); • *Refreshment* Manajemen Risiko Level 1 - 4 Badan Sertifikasi Manajemen Risiko (oleh Efektif Pro); • *Training* Penerapan Strategi *Anti-Fraud* (oleh Victoria Institute); • *Refrehsment* Tipologi Tindak Pidana Pencucian Uang (TPPU)/Tindak Pidana Pendanaan Terorisme (TPPT)/ Pendanaan Proliferasi Senjata Pemusnah Massal (PPSPM) Melalui Kredit dan *Treasury* (oleh PT Andara Sarana); • Prospek Ekonomi Tahun 2025 Mencapai Indonesia Emas 2045 (oleh Forum Komunikasi Direktur Kepatuhan Perbankan); serta • Seminar Sinergi Emiten Dalam Membangun Pertumbuhan Ekonomi Berkelanjutan (oleh Asosiasi Emiten Indonesia).	• Innovate, Invest, Inspire: Strategic Planning for Listed Companies in 2024's Stock Market (by Indonesia Corporate Secretary Association); • Expert Sharing: Sustainable Finance (by Bank Victoria); • Dealing With VUCA Challenges: Contextual Leadership Journey (by Bank Victoria); • Refreshment of Risk Management Competency Unit Level 5 (by Efektif Pro); • Briefing: Mentoring and Mechanism for Implementing Recertification of Risk Management Level 6 (by Bank Victoria); • Sharing Session: Establishing Relationships in Togetherness (by Bank Victoria); • Corporate Culture and Service (by Bank Victoria); • Office 365 Dissemination Training (by Bank Victoria); • Recertification of Risk Management Level 5 (by Banking Profession Certification Institution); • Sharing Session Market Update & Economic Outlook (by Bank Victoria); • Role of Corporate Secretary as BOD Business Partner to Boost Sustainability Awareness (by Indonesia Corporate Secretary Association); • Training on Consumer Protection and Personal Data Protection (by Victoria Institute); • Introduction to International Financial Reporting Standards: Sustainability Disclosure Standards S1 and S2 (by Indonesia Corporate Secretary Association); • Intensification of Financial Services Regulation No. 15/POJK.04/2022 on Stock Split and Merger by Public Companies (by Indonesia Corporate Secretary Association); • Refreshment of Risk Management Level 1 - 4 Risk Management Certification Institution (by Efektif Pro); • Training on Anti-Fraud Strategy Implementation (by Victoria Institute); • Refreshment of Typology of Money Laundering Crimes (TPPU)/Terrorism Financing Crimes (TPPT)/Proliferation Financing of Weapons of Mass Destruction (PPSPM) through Credit and Treasury (by PT Andara Sarana); • Economic Prospects in 2025 to Achieve Golden Indonesia 2045 (by Communication Forum for Director of Banking Compliance); and • Seminar on Issuer Synergy in Establishing Sustainable Economic Growth (by Indonesian Public Listed Companies Association).
Djoko Soendjojo	Kepala Divisi SKAI Head of SKAI Division	• *Corporate Culture* dan *Service* (oleh Bank Victoria); • *Expert Sharing*: Keuangan Berkelanjutan (oleh Bank Victoria); • Pendampingan dan Bimbingan Teknis Resertifikasi Manajemen Risiko Jenjang 6 (oleh Bank Victoria); • *Dealing With* VUCA *Challenges: Contextual Leadership Journey* (oleh Bank Victoria); • Pembekalan: Pendampingan dan Mekanisme Pelaksanaan Resertifikasi Manajemen Risiko Jenjang 6 (oleh Bank Victoria); • Program Pengkinian Sertifikasi Manajemen Risiko Jenjang 6 (oleh Efektif Pro); • *Sharing Session*: Menjalin Silaturahmi dalam Kebersamaan (oleh Bank Victoria); • Resertifikasi Manajemen Risiko Jenjang 6 (oleh Lembaga Sertifikasi Profesi Perbankan); • *Training* Sosialisasi Office 365 (oleh Bank Victoria); • *Training* Sertifikat Elektronik (oleh Kantor Notaris dan Pejabat Pembuat Akta Tanah); • *Awareness* Penerapan Peraturan Otoritas Jasa Keuangan Perlindungan Konsumen dan Undang-Undang Perlindungan Data Pribadi (oleh RSM Indonesia); • *Sharing Session Market Update & Economic Outlook* (oleh Bank Victoria); • *Training* Perlindungan Konsumen dan Perlindungan Data Pribadi (oleh Victoria Institute); • *Refreshment* Manajemen Risiko Level 1 - 4 Badan Sertifikasi Manajemen Risiko (oleh Efektif Pro);	• Corporate Culture and Service (by Bank Victoria); • Expert Sharing: Sustainable Finance (by Bank Victoria); • Mentoring and Technical Guidance for Recertification of Risk Management Level 6 (by Bank Victoria); • Dealing With VUCA Challenges: Contextual Leadership Journey (by Bank Victoria); • Briefing: Mentoring and Mechanism for Implementing Recertification of Risk Management Level 6 (by Bank Victoria); • Update Program of Risk Management Certification Level 6 (by Efektif Pro); • Sharing Session: Establishing Relationships in Togetherness (by Bank Victoria); • Recertification of Risk Management Level 6 (by Banking Profession Certification Institution); • Office 365 Dissemination Training (by Bank Victoria); • Electronic Certificate Training (by Notary Office and Land Deed Officials); • Awareness of Implementation of Financial Services Authority Regulations on Consumer Protection and Personal Data Protection Law (by RSM Indonesia); • Sharing Session Market Update & Economic Outlook (by Bank Victoria); • Training on Consumer Protection and Personal Data Protection (by Victoria Institute); • Refreshment of Risk Management Level 1 - 4 Risk Management Certification Institution (by Efektif Pro);

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		• *Training* Penundaan Kewajiban Pembayaran Utang (PKPU) (oleh FKNK Law Firm); • *Training* Penerapan Strategi *Anti-Fraud* (oleh Victoria Institute); • *Refrehsment* Tipologi Tindak Pidana Pencucian Uang (TPPU)/Tindak Pidana Pendanaan Terorisme (TPPT)/ Pendanaan Proliferasi Senjata Pemusnah Massal (PPSPM) Melalui Kredit dan *Treasury* (oleh PT Andara Sarana); • *Expert Sharing Session*: Peluang dan Tantangan Pembiayaan Bank pada Bisnis Model *Multi Finance* (oleh Asosiasi Perusahaan Pembiayaan Indonesia); serta • *Training* Peringatan Hari Anti-korupsi Sedunia (Hakordia) dengan Tema "Teguhkan Komitmen Berantas Korupsi untuk Indonesia Maju" (oleh Otoritas Jasa Keuangan Institute).	• Training on Debt Payment Suspension (PKPU) (by FKNK Law Firm); • Training on Anti-Fraud Strategy Implementation (by Victoria Institute); • Refreshment of Typology of Money Laundering Crimes (TPPU)/Terrorism Financing Crimes (TPPT)/Proliferation Financing of Weapons of Mass Destruction (PPSPM) through Credit and Treasury (by PT Andara Sarana); • Expert Sharing Session: Opportunities and Challenges of Bank Financing in Multi Finance Business Model (by Indonesian Financing Company Association); and • Training for Commemorating World Anti-Corruption Day (Hakordia) with the Theme "Strengthening Commitment to Eradicating Corruption for Advanced Indonesia" (by Financial Services Authority Institute).
R.R. Utami Tjipto	Kepala Divisi *Compliance, System Procedure & Customer Protection* Head of Compliance, System Procedure & Customer Protection Division	• *Corporate Culture* dan *Service* (oleh Bank Victoria); • *Expert Sharing*: Keuangan Berkelanjutan (oleh Bank Victoria); • *Dealing With* VUCA *Challenges*: *Contextual Leadership Journey* (oleh Bank Victoria); • *Sharing Session*: Menjalin Silaturahmi dalam Kebersamaan (oleh Bank Victoria); • *Training* Sosialisasi Office 365 (oleh Bank Victoria); • *Awareness* Penerapan Peraturan Otoritas Jasa Keuangan Perlindungan Konsumen dan Undang-Undang Perlindungan Data Pribadi (oleh RSM Indonesia); • *Sharing Session Market Update & Economic Outlook* (oleh Bank Victoria); • *Training* Perlindungan Konsumen dan Perlindungan Data Pribadi (oleh Victoria Institute); • *Training* Penerapan Strategi *Anti-Fraud* (oleh Victoria Institute); • *Refrehsment* Tipologi Tindak Pidana Pencucian Uang (TPPU)/Tindak Pidana Pendanaan Terorisme (TPPT)/ Pendanaan Proliferasi Senjata Pemusnah Massal (PPSPM) Melalui Kredit dan *Treasury* (oleh PT Andara Sarana); • *Expert Sharing Session*: Peluang dan Tantangan Pembiayaan Bank pada Bisnis Model *Multi Finance* (oleh Asosiasi Perusahaan Pembiayaan Indonesia); • *Training* Peringatan Hari Antikorupsi Sedunia (Hakordia) dengan Tema "Teguhkan Komitmen Berantas Korupsi untuk Indonesia Maju" (oleh Otoritas Jasa Keuangan Institute); • *Training* Pembekalan Manajemen Risiko Jenjang 6 (oleh PT Arfaidhams Secret); serta • Uji Sertifikasi Manajemen Risiko Jenjang 6 (oleh Lembaga Sertifikasi Profesional Perbankan).	• Corporate Culture and Service (by Bank Victoria); • Expert Sharing: Sustainable Finance (by Bank Victoria); • Dealing With VUCA Challenges: Contextual Leadership Journey (by Bank Victoria); • Sharing Session: Establishing Relationships in Togetherness (by Bank Victoria); • Office 365 Dissemination Training (by Bank Victoria); • Awareness of Implementation of Financial Services Authority Regulations on Consumer Protection and Personal Data Protection Law (by RSM Indonesia); • Sharing Session Market Update & Economic Outlook (by Bank Victoria); • Training on Consumer Protection and Personal Data Protection (by Victoria Institute); • Training on Anti-Fraud Strategy Implementation (by Victoria Institute); • Refreshment of Typology of Money Laundering Crimes (TPPU)/Terrorism Financing Crimes (TPPT)/Proliferation Financing of Weapons of Mass Destruction (PPSPM) through Credit and Treasury (by PT Andara Sarana); • Expert Sharing Session: Opportunities and Challenges of Bank Financing in Multi Finance Business Model (by Indonesian Financing Company Association); • Training for Commemorating World Anti-Corruption Day (Hakordia) with the Theme "Strengthening Commitment to Eradicating Corruption for Advanced Indonesia" (by Financial Services Authority Institute); • Briefing Training on Risk Management Level 6 (by PT Arfaidhams Secret); and • Certification Test of Risk Management Level 6 (by Banking Professionals Certification Institute).
Sam R. Soelaeman	Kepala Divisi *Risk Management/ Integrated* Head of Risk Management/ Integrated Division	• *Expert Sharing*: Keuangan Berkelanjutan (oleh Bank Victoria); • Sertifikasi Manajemen Risiko Jenjang 6 (oleh Lembaga Pengembangan Perbankan Indonesia); • *Dealing With* VUCA *Challenges*: *Contextual Leadership Journey* (oleh Bank Victoria); • Webinar Manajamen Risiko: Implementasi Manajemen Risiko ISO 31000: 2018 (oleh Perbanas Institute); • *Sharing Session*: Menjalin Silaturahmi dalam Kebersamaan (oleh Bank Victoria); • *Corporate Culture* dan *Service* (oleh Bank Victoria); • Konvensi Nasional Rancangan Standar Kompetensi Kerja Nasional Indonesia (RSKKNI) Bidang Manajemen Risiko Perbankan (oleh Otoritas Jasa Keuangan Institute); • *Training* Sosialisasi Office 365 (oleh Bank Victoria); • *Awareness* Penerapan Peraturan Otoritas Jasa Keuangan Perlindungan Konsumen dan Undang-Undang Perlindungan Data Pribadi (oleh RSM Indonesia); • *Sharing Session Market Update & Economic Outlook* (oleh Bank Victoria); • *Training* Perlindungan Konsumen dan Perlindungan Data Pribadi (oleh Victoria Institute); • *Training* Penerapan Strategi *Anti-Fraud* (oleh Victoria Institute); serta • *Refrehsment* Tipologi Tindak Pidana Pencucian Uang (TPPU)/Tindak Pidana Pendanaan Terorisme (TPPT)/ Pendanaan Proliferasi Senjata Pemusnah Massal (PPSPM) Melalui Kredit dan *Treasury* (oleh PT Andara Sarana),	• Expert Sharing: Sustainable Finance (by Bank Victoria); • Certification of Risk Management Level 6 (by Indonesian Banking Development Institute); • Dealing With VUCA Challenges: Contextual Leadership Journey (by Bank Victoria); • Risk Management Webinar: Implementation of Risk Management ISO 31000: 2018 (by Perbanas Institute); • Sharing Session: Establishing Relationships in Togetherness (by Bank Victoria); • Corporate Culture and Service (by Bank Victoria); • National Convention of the Draft of Indonesian National Work Competency Standards (RSKKNI) in Banking Risk Management (by Financial Services Authority Institute); • Office 365 Dissemination Training (by Bank Victoria); • Awareness of Implementation of Financial Services Authority Regulations on Consumer Protection and Personal Data Protection Law (by RSM Indonesia); • Sharing Session Market Update & Economic Outlook (by Bank Victoria); • Training on Consumer Protection and Personal Data Protection (by Victoria Institute); • Training on Anti-Fraud Strategy Implementation (by Victoria Institute); and • Refreshment of Typology of Money Laundering Crimes (TPPU)/Terrorism Financing Crimes (TPPT)/Proliferation Financing of Weapons of Mass Destruction (PPSPM) through Credit and Treasury (by PT Andara Sarana),

Nama Name	Jabatan Position	Materi Material	
Elies Gunawan	Kepala Divisi *International Banking* Head of International Banking Division	• *Sharing Session*: Hargai Hidupmu (oleh Bank Victoria); • *Refreshment* Unit Kompetensi Manajemen Risiko Jenjang 5 (oleh Efektif Pro); • Pembekalan: Pendampingan dan Mekanisme Pelaksanaan Resertifikasi Manajemen Risiko Jenjang 5 (oleh Bank Victoria); • *Sharing Session: Blessing in Faithfulness* (oleh Bank Victoria); • *Training Complience Champion* (oleh Bank Victoria); • *Sharing Knowledge* MT1XX, MT2XX, *Preview* ISO20022 MX SWIFT *Format* dan RMA PORTAL SWIFT (oleh Asosiasi SWIFT Indonesia); • *Corporate Culture* dan *Service* (oleh Bank Victoria); • *Sharing Session*: Menjalin Silaturahmi dalam Kebersamaan (oleh Bank Victoria); • *Sharing Session*: Melawan Rasa Takut (oleh Bank Victoria); • *Sharing Session*: Bersyukur dalam Kehidupan (oleh Bank Victoria); • Resertifikasi Manajemen Risiko Jenjang 5 (oleh Lembaga Sertifikasi Profesi Perbankan); • *Training* Sosialisasi Office 365 (oleh Bank Victoria); • *Sharing Session:* Perubahan Paradigma (oleh Bank Victoria); • *Sharing Session:* Bangkit dari Keterpurukan (oleh Bank Victoria); • *Transport* Undangan *Customer Gathering* PT Praweda Ciptakarsa Informatika (oleh Soedarpo Informatika); • Partisipasi Bulan Literasi Perdagangan Berjangka Komoditi 2024 (oleh Asosiasi Perdagangan Berjangka Komoditi Indonesia); • *Sharing Session Market Update & Economic Outlook* (oleh Bank Victoria); • *Training* Perlindungan Konsumen dan Perlindungan Data Pribadi (oleh Victoria Institute); • *Gathering* (AMG) dan *User Group Meeting* (UGM) 2024 (oleh Asosiasi SWIFT Indonesia); • *Training* Penerapan Strategi *Anti-Fraud* (oleh Victoria Institute); • *Refrehsment* Tipologi Tindak Pidana Pencucian Uang (TPPU)/Tindak Pidana Pendanaan Terorisme (TPPT)/ Pendanaan Proliferasi Senjata Pemusnah Massal (PPSPM) Melalui Kredit dan *Treasury* (oleh PT Andara Sarana); serta • *Coaching* dan *Sharing Session* Kepala Operasional (oleh Bank Victoria).	• Sharing Session: Valuing Your Life (by Bank Victoria); • Refreshment of Risk Management Competency Unit Level 5 (by Efektif Pro); • Briefing: Mentoring and Mechanism for Implementing Recertification of Risk Management Level 5 (by Bank Victoria); • Sharing Session: Blessing in Faithfulness (by Bank Victoria); • Training Compliance Champion (by Bank Victoria); • Sharing Knowledge of MT1XX, MT2XX, Preview ISO20022 MX SWIFT Format and RMA SWIFT PORTAL (by Indonesian SWIFT Association); • Corporate Culture and Service (by Bank Victoria); • Sharing Session: Establishing Relationships in Togetherness (by Bank Victoria); • Sharing Session: Fighting the Fear (by Bank Victoria); • Sharing Session: Being Grateful in Life (by Bank Victoria); • Recertification of Risk Management Level 5 (by Banking Profession Certification Institution); • Office 365 Dissemination Training (by Bank Victoria); • Sharing Session: Paradigm Shift (by Bank Victoria); • Sharing Session: Rising from the Downturn (by Bank Victoria); • Transport Invitation of Customer Gathering of PT Praweda Ciptakarsa Informatika (by Soedarpo Informatika); • Participation in Literacy Month on the 2024 Commodity Futures Trading (by Indonesian Commodity Futures Trading Association); • Sharing Session Market Update & Economic Outlook (by Bank Victoria); • Training on Consumer Protection and Personal Data Protection (by Victoria Institute); • Gathering (AMG) and User Group Meeting (UGM) 2024 (by Indonesian SWIFT Association); • Training on Anti-Fraud Strategy Implementation (by Victoria Institute); • Refreshment of Typology of Money Laundering Crimes (TPPU)/Terrorism Financing Crimes (TPPT)/Proliferation Financing of Weapons of Mass Destruction (PPSPM) through Credit and Treasury (by PT Andara Sarana); and • Coaching and Sharing Session of the Head of Operations (by Bank Victoria).
Ritayana	Kepala Divisi *Treasury* Head of Treasury Division	• *Corporate Culture* dan *Service* (oleh Bank Victoria); • *Sharing Session*: Semua Dimulai dari Keluarga (oleh Bank Victoria); • *Sharing Session: Learn For Release* (oleh Bank Victoria); • *Expert Sharing*: Keuangan Berkelanjutan (oleh Bank Victoria); • Pendampingan dan Bimbingan Teknis Resertifikasi Manajemen Risiko Jenjang 6 (oleh Bank Victoria); • *Sharing Session: Dream and Faith* (oleh Bank Victoria); • *Sharing Session*: Hargai Hidupmu (oleh Bank Victoria); • *Dealing With* VUCA *Challenges: Contextual Leadership Journey* (oleh Bank Victoria); • Pembekalan: Pendampingan dan Mekanisme Pelaksanaan Resertifikasi Manajemen Risiko Jenjang 6 (oleh Bank Victoria); • *Sharing Session: Blessing in Faithfulness* (oleh Bank Victoria); • Program Pengkinian Sertifikasi Manajemen Risiko Jenjang 6 (oleh Efektif Pro); • Undangan Acara BCA *Bonds Course Games* 2024 (oleh Bank Central Asia); • *Sharing Session*: Hidup Lebih Bermakna (oleh Bank Victoria); • *Sharing Session*: Menjalin Silaturahmi dalam Kebersamaan (oleh Bank Victoria); • *Sharing Session*: Melawan Rasa Takut (oleh Bank Victoria);	• Corporate Culture and Service (by Bank Victoria); • Sharing Session: Everything Begins with Family (by Bank Victoria); • Sharing Session: Learn For Release (by Bank Victoria); • Expert Sharing: Sustainable Finance (by Bank Victoria); • Mentoring and Technical Guidance for Recertification of Risk Management Level 6 (by Bank Victoria); • Sharing Session: Dream and Faith (by Bank Victoria); • Sharing Session: Valuing Your Life (by Bank Victoria); • Dealing With VUCA Challenges: Contextual Leadership Journey (by Bank Victoria); • Briefing: Mentoring and Mechanism for Implementing Recertification of Risk Management Level 6 (by Bank Victoria); • Sharing Session: Blessing in Faithfulness (by Bank Victoria); • Update Program of Risk Management Certification Level 6 (by Efektif Pro); • Invitation to BCA Bonds Course Games 2024 (by Bank Central Asia); • Sharing Session: A More Meaningful Life (by Bank Victoria); • Sharing Session: Establishing Relationships in Togetherness (by Bank Victoria); • Sharing Session: Fighting the Fear (by Bank Victoria);

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		• *Sharing Session*: Bersyukur dalam Kehidupan (oleh Bank Victoria); • Resertifikasi Manajemen Risiko Jenjang 6 (oleh Lembaga Sertifikasi Profesi Perbankan); • *Training* Sosialisasi Office 365 (oleh Bank Victoria); • *Sharing Session*: Perubahan Paradigma (oleh Bank Victoria); • *Sharing Session*: Bangkit dari Keterpurukan (oleh Bank Victoria); • *Sharing Session Market Update & Economic Outlook* (oleh Bank Victoria); • *Training* Perlindungan Konsumen dan Perlindungan Data Pribadi (oleh Victoria Institute); • *Refreshment* Manajemen Risiko Level 1 - 4 Badan Sertifikasi Manajemen Risiko (oleh Efektif Pro); • *Training* Penerapan Strategi *Anti-Fraud* (oleh Victoria Institute); serta • *Refrehsment* Tipologi Tindak Pidana Pencucian Uang (TPPU)/Tindak Pidana Pendanaan Terorisme (TPPT)/ Pendanaan Proliferasi Senjata Pemusnah Massal (PPSPM) Melalui Kredit dan *Treasury* (oleh PT Andara Sarana).	• Sharing Session: Being Grateful in Life (by Bank Victoria); • Recertification of Risk Management Level 6 (by Banking Profession Certification Institution); • Office 365 Dissemination Training (by Bank Victoria); • Sharing Session: Paradigm Shift (by Bank Victoria); • Sharing Session: Rising from the Downturn (by Bank Victoria); • Sharing Session Market Update & Economic Outlook (by Bank Victoria); • Training on Consumer Protection and Personal Data Protection (by Victoria Institute); • Refreshment of Risk Management Level 1 - 4 Risk Management Certification Institution (by Efektif Pro); • Training on Anti-Fraud Strategy Implementation (by Victoria Institute); and • Refreshment of Typology of Money Laundering Crimes (TPPU)/Terrorism Financing Crimes (TPPT)/Proliferation Financing of Weapons of Mass Destruction (PPSPM) through Credit and Treasury (by PT Andara Sarana).
Theresia Maria Dhewajani	Kepala Divisi *Operations & Internal Control* Head of Operations & Internal Control Division	• *Sharing Session*: Semua Dimulai dari Keluarga (oleh Bank Victoria); • *Sharing Session*: *Learn For Release* (oleh Bank Victoria); • *Expert Sharing*: Keuangan Berkelanjutan (oleh Bank Victoria); • Pendampingan dan Bimbingan Teknis Resertifikasi Manajemen Risiko Jenjang 6 (oleh Bank Victoria); • *Sharing Session: Dream and Faith* (oleh Bank Victoria); • *Sharing Session*: Hargai Hidupmu (oleh Bank Victoria); • *Dealing With* VUCA *Challenges*: *Contextual Leadership Journey* (oleh Bank Victoria); • Pembekalan: Pendampingan dan Mekanisme Pelaksanaan Resertifikasi Manajemen Risiko Jenjang 6 (oleh Bank Victoria); • *Sharing Session: Blessing in Faithfulness* (oleh Bank Victoria); • Program Pengkinian Sertifikasi Manajemen Risiko Jenjang 6 (oleh Efektif Pro); • *Corporate Culture* dan *Service* (oleh Bank Victoria); • *Sharing Session*: Menjalin Silaturahmi dalam Kebersamaan (oleh Bank Victoria); • *Sharing Session*: Melawan Rasa Takut (oleh Bank Victoria); • *Sharing Session*: Bersyukur dalam Kehidupan (oleh Bank Victoria); • Peluang dan Tantangan Perlindungan Data Pribadi dalam Transaksi di Era Digital (oleh Otoritas Jasa Keuangan); • Resertifikasi Manajemen Risiko Jenjang 6 (oleh Lembaga Sertifikasi Profesi Perbankan); • *Training* Sosialisasi Office 365 (oleh Bank Victoria); • *Sharing Session*: Perubahan Paradigma (oleh Bank Victoria); • *Sharing Session*: Bangkit dari Keterpurukan (oleh Bank Victoria); • *Awareness* Penerapan Peraturan Otoritas Jasa Keuangan Perlindungan Konsumen dan Undang-Undang Perlindungan Data Pribadi (oleh RSM Indonesia); • *Customer Due Diligence* Khusus Warga Negara Asing (oleh PT Hadi Abiez Entertaiment); • *Sharing Session Market Update & Economic Outlook* (oleh Bank Victoria); • *Training* Perlindungan Konsumen dan Perlindungan Data Pribadi (oleh Victoria Institute); • *Refreshment* Manajemen Risiko Level 1 - 4 Badan Sertifikasi Manajemen Risiko (oleh Efektif Pro); • Sertifikasi Sistem Pembayaran dan Pengelolaan Uang Rupiah Jenjang 6: Pengelolaan Uang Tunai (oleh Lembaga Sertifikasi Profesi Sistem Pembayaran Indonesia); • *Training* Penerapan Strategi *Anti-Fraud* (oleh Victoria Institute);	• Sharing Session: Everything Begins with Family (by Bank Victoria); • Sharing Session: Learn For Release (by Bank Victoria); • Expert Sharing: Sustainable Finance (by Bank Victoria); • Mentoring and Technical Guidance for Recertification of Risk Management Level 6 (by Bank Victoria); • Sharing Session: Dream and Faith (by Bank Victoria); • Sharing Session: Valuing Your Life (by Bank Victoria); • Dealing With VUCA Challenges: Contextual Leadership Journey (by Bank Victoria); • Briefing: Mentoring and Mechanism for Implementing Recertification of Risk Management Level 6 (by Bank Victoria); • Sharing Session: Blessing in Faithfulness (by Bank Victoria); • Update Program of Risk Management Certification Level 6 (by Efektif Pro); • Corporate Culture and Service (by Bank Victoria); • Sharing Session: Establishing Relationships in Togetherness (by Bank Victoria); • Sharing Session: Fighting the Fear (by Bank Victoria); • Sharing Session: Being Grateful in Life (by Bank Victoria); • Opportunities and Challenges of Personal Data Protection in Transactions in the Digital Era (by Financial Services Authority); • Recertification of Risk Management Level 6 (by Banking Profession Certification Institution); • Office 365 Dissemination Training (by Bank Victoria); • Sharing Session: Paradigm Shift (by Bank Victoria); • Sharing Session: Rising from the Downturn (by Bank Victoria); • Awareness of Implementation of Financial Services Authority Regulations on Consumer Protection and Personal Data Protection Law (by RSM Indonesia); • Customer Due Diligence Specifically for Foreign Citizens (by PT Hadi Abiez Entertainment); • Sharing Session Market Update & Economic Outlook (by Bank Victoria); • Training on Consumer Protection and Personal Data Protection (by Victoria Institute); • Refreshment of Risk Management Level 1 - 4 Risk Management Certification Institution (by Efektif Pro); • Payment System Certification and Rupiah Money Management Level 6: Cash Management (by Indonesian Payment System Profession Certification Institute); • Training on Anti-Fraud Strategy Implementation (by Victoria Institute);

Nama Name	Jabatan Position	Materi Material	
		• *Refrehsment* Tipologi Tindak Pidana Pencucian Uang (TPPU)/Tindak Pidana Pendanaan Terorisme (TPPT)/ Pendanaan Proliferasi Senjata Pemusnah Massal (PPSPM) Melalui Kredit dan *Treasury* (oleh PT Andara Sarana); • *Training* Sistem Pembayaran dan Pengelolaan Uang Rupiah: Pengelolaan Uang Tunai Jenjang 6 (oleh Lembaga Pelatihan Kerja Praveena); • *Coaching* dan *Sharing Session* Kepala Operasional (oleh Bank Victoria); serta • *Training Interactive Motivational Leadership: Transformational Leadership* (oleh Bapak Louis Sastrawijaya).	• Refreshment of Typology of Money Laundering Crimes (TPPU)/Terrorism Financing Crimes (TPPT)/Proliferation Financing of Weapons of Mass Destruction (PPSPM) through Credit and Treasury (by PT Andara Sarana); • Training on Payment System and Rupiah Money Management: Cash Management Level 6 (by Praveena Job Training Institute); • Coaching and Sharing Session of the Head of Operations (by Bank Victoria); and • Training Interactive Motivational Leadership: Transformational Leadership (by Mr. Louis Sastrawijaya).
Yosef Sudikbyo	Kepala Divisi *Corporate Legal* Head of Corporate Legal Division	• *Corporate Culture* dan *Service* (oleh Bank Victoria); • *Dealing With* VUCA *Challenges: Contextual Leadership Journey* (oleh Bank Victoria); • *Refreshment* Unit Kompetensi Manajemen Risiko Jenjang 5 (oleh Efektif Pro); • Pembekalan: Pendampingan dan Mekanisme Pelaksanaan Resertifikasi Manajemen Risiko Jenjang 5 (oleh Bank Victoria); • *Sharing Session*: Menjalin Silaturahmi dalam Kebersamaan (oleh Bank Victoria); • *Training* Sosialisasi Office 365 (oleh Bank Victoria); • Resertifikasi Manajemen Risiko Jenjang 5 (oleh Lembaga Sertifikasi Profesi Perbankan); • *Training* Sertifikat Elektronik (oleh Kantor Notaris dan Pejabat Pembuat Akta Tanah); • Resertifikasi Manajemen Risiko Jenjang 4 dan Jenjang 5 (oleh Lembaga Sertifikasi Profesi Perbankan); • *Sharing Session Market Update & Economic Outlook* (oleh Bank Victoria); • *Training* Perlindungan Konsumen dan Perlindungan Data Pribadi (oleh Victoria Institute); • *Refreshment* Manajemen Risiko Level 1 - 4 Badan Sertifikasi Manajemen Risiko (oleh Efektif Pro); • *Training* Penerapan Strategi *Anti-Fraud* (oleh Victoria Institute); serta • *Training* Penundaan Kewajiban Pembayaran Utang (PKPU) (oleh FKNK Law Firm).	• Corporate Culture and Service (by Bank Victoria); • Dealing With VUCA Challenges: Contextual Leadership Journey (by Bank Victoria); • Refreshment of Risk Management Competency Unit Level 5 (by Efektif Pro); • Briefing: Mentoring and Mechanism for Implementing Recertification of Risk Management Level 5 (by Bank Victoria); • Sharing Session: Establishing Relationships in Togetherness (by Bank Victoria); • Office 365 Dissemination Training (by Bank Victoria); • Recertification of Risk Management Level 5 (by Banking Profession Certification Institution); • Electronic Certificate Training (by Notary Office and Land Deed Officials); • Recertification of Risk Management Level 4 and Level 5 (by Banking Profession Certification Institution); • Sharing Session Market Update & Economic Outlook (by Bank Victoria); • Training on Consumer Protection and Personal Data Protection (by Victoria Institute); • Refreshment of Risk Management Level 1 - 4 Risk Management Certification Institution (by Efektif Pro); • Training on Anti-Fraud Strategy Implementation (by Victoria Institute); and • Training on Debt Payment Suspension (PKPU) (by FKNK Law Firm).
Novita Indriyani	Kepala Divisi *Credit Legal* Head of Credit Legal Division	• *Sharing Session*: Semua Dimulai dari Keluarga (oleh Bank Victoria); • *Sharing Session: Learn for Release* (oleh Bank Victoria); • *Expert Sharing*: Keuangan Berkelanjutan (oleh Bank Victoria); • Pendampingan dan Bimbingan Teknis Resertifikasi Manajemen Risiko Jenjang 6 (oleh Bank Victoria); • *Sharing Session: Dream and Faith* (oleh Bank Victoria); • *Sharing Session*: Hargai Hidupmu (oleh Bank Victoria); • *Dealing With* VUCA *Challenges: Contextual Leadership Journey* (oleh Bank Victoria); • Pembekalan: Pendampingan dan Mekanisme Pelaksanaan Resertifikasi Manajemen Risiko Jenjang 6 (oleh Bank Victoria); • *Sharing Session: Blessing in Faithfulness* (oleh Bank Victoria); • Program Pengkinian Sertifikasi Manajemen Risiko Jenjang 6 (oleh Efektif Pro); • *Sharing Session*: Hidup Lebih Bermakna (oleh Bank Victoria); • *Sharing Session*: Menjalin Silaturahmi dalam Kebersamaan (oleh Bank Victoria); • *Sharing Session*: Melawan Rasa Takut (oleh Bank Victoria); • *Corporate Culture* dan *Service* (oleh Bank Victoria); • Resertifikasi Manajemen Risiko Jenjang 6 (oleh Lembaga Sertifikasi Profesi Perbankan); • *Training* Sosialisasi Office 365 (oleh Bank Victoria); • *Training* Sertifikat Elektronik (oleh Kantor Notaris dan Pejabat Pembuat Akta Tanah); • *Sharing Session Market Update & Economic Outlook* (oleh Bank Victoria);	• Sharing Session: Everything Begins with Family (by Bank Victoria); • Sharing Session: Learn for Release (by Bank Victoria); • Expert Sharing: Sustainable Finance (by Bank Victoria); • Mentoring and Technical Guidance for Recertification of Risk Management Level 6 (by Bank Victoria); • Sharing Session: Dream and Faith (by Bank Victoria); • Sharing Session: Valuing Your Life (by Bank Victoria); • Dealing With VUCA Challenges: Contextual Leadership Journey (by Bank Victoria); • Briefing: Mentoring and Mechanism for Implementing Recertification of Risk Management Level 6 (by Bank Victoria); • Sharing Session: Blessing in Faithfulness (by Bank Victoria); • Update Program of Risk Management Certification Level 6 (by Efektif Pro); • Sharing Session: A More Meaningful Life (by Bank Victoria); • Sharing Session: Establishing Relationships in Togetherness (by Bank Victoria); • Sharing Session: Fighting the Fear (by Bank Victoria); • Corporate Culture and Service (by Bank Victoria); • Recertification of Risk Management Level 6 (by Banking Profession Certification Institution); • Office 365 Dissemination Training (by Bank Victoria); • Electronic Certificate Training (by Notary Office and Land Deed Officials); • Sharing Session Market Update & Economic Outlook (by Bank Victoria);

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		• *Training* Perlindungan Konsumen dan Perlindungan Data Pribadi (oleh Victoria Institute); • *Refreshment* Manajemen Risiko Level 1 - 4 Badan Sertifikasi Manajemen Risiko (oleh Efektif Pro); • *Training* Penerapan Strategi *Anti-Fraud* (oleh Victoria Institute); • *Training* Penundaan Kewajiban Pembayaran Utang (PKPU) (oleh FKNK Law Firm); serta • *Refrehsment* Tipologi Tindak Pidana Pencucian Uang (TPPU)/Tindak Pidana Pendanaan Terorisme (TPPT)/ Pendanaan Proliferasi Senjata Pemusnah Massal (PPSPM) Melalui Kredit dan *Treasury* (oleh PT Andara Sarana).	• Training on Consumer Protection and Personal Data Protection (by Victoria Institute); • Refreshment of Risk Management Level 1 - 4 Risk Management Certification Institution (by Efektif Pro); • Training on Anti-Fraud Strategy Implementation (by Victoria Institute); • Training on Debt Payment Suspension (PKPU) (by FKNK Law Firm); and • Refreshment of Typology of Money Laundering Crimes (TPPU)/Terrorism Financing Crimes (TPPT)/Proliferation Financing of Weapons of Mass Destruction (PPSPM) through Credit and Treasury (by PT Andara Sarana).
Teguh Trisno Pambudi	Kepala Divisi *Credit Risk Review* Head of Credit Risk Review Division	• *Expert Sharing*: Keuangan Berkelanjutan (oleh Bank Victoria); • Pendampingan dan Bimbingan Teknis Resertifikasi Manajemen Risiko Jenjang 6 (oleh Bank Victoria); • *Dealing With* VUCA *Challenges*: *Contextual Leadership Journey* (oleh Bank Victoria); • Pembekalan: Pendampingan dan Mekanisme Pelaksanaan Resertifikasi Manajemen Risiko Jenjang 6 (oleh Bank Victoria); • Program Pengkinian Sertifikasi Manajemen Risiko Jenjang 6 (oleh Efektif Pro); • *Sharing Session*: Menjalin Silaturahmi dalam Kebersamaan (oleh Bank Victoria); • *Corporate Culture* dan *Service* (oleh Bank Victoria); • Resertifikasi Manajemen Risiko Jenjang 6 (oleh Lembaga Sertifikasi Profesi Perbankan); • *Training* Sosialisasi Office 365 (oleh Bank Victoria); • *Training* Sertifikat Elektronik (oleh Kantor Notaris dan Pejabat Pembuat Akta Tanah); • *Sharing Session Market Update & Economic Outlook* (oleh Bank Victoria); • *Training* Perlindungan Konsumen dan Perlindungan Data Pribadi (oleh Victoria Institute); • *Refreshment* Manajemen Risiko Level 1 - 4 Badan Sertifikasi Manajemen Risiko (oleh Efektif Pro); • *Training* Penerapan Strategi *Anti-Fraud* (oleh Victoria Institute); • *Training* Penundaan Kewajiban Pembayaran Utang (PKPU) (oleh FKNK Law Firm); • *Training* Analisa Laporan Keuangan Industri (oleh Bapak Nur Rohmat); • *Refrehsment* Tipologi Tindak Pidana Pencucian Uang (TPPU)/Tindak Pidana Pendanaan Terorisme (TPPT)/ Pendanaan Proliferasi Senjata Pemusnah Massal (PPSPM) Melalui Kredit dan *Treasury* (oleh PT Andara Sarana); • *Expert Sharing Session*: Peluang dan Tantangan Pembiayaan Bank pada Bisnis Model Multi Finance (oleh Asosiasi Perusahaan Pembiayaan Indonesia).	• Expert Sharing: Sustainable Finance (by Bank Victoria); • Mentoring and Technical Guidance for Recertification of Risk Management Level 6 (by Bank Victoria); • Dealing With VUCA Challenges: Contextual Leadership Journey (by Bank Victoria); • Briefing: Mentoring and Mechanism for Implementing Recertification of Risk Management Level 6 (by Bank Victoria); • Update Program of Risk Management Certification Level 6 (by Efektif Pro); • Sharing Session: Establishing Relationships in Togetherness (by Bank Victoria); • Corporate Culture and Service (by Bank Victoria); • Recertification of Risk Management Level 6 (by Banking Profession Certification Institution); • Office 365 Dissemination Training (by Bank Victoria); • Electronic Certificate Training (by Notary Office and Land Deed Officials); • Sharing Session Market Update & Economic Outlook (by Bank Victoria); • Training on Consumer Protection and Personal Data Protection (by Victoria Institute); • Refreshment of Risk Management Level 1 - 4 Risk Management Certification Institution (by Efektif Pro); • Training on Anti-Fraud Strategy Implementation (by Victoria Institute); • Training on Debt Payment Suspension (PKPU) (by FKNK Law Firm); • Training on Analysis of Industrial Financial Statements (by Mr. Nur Rohmat); and • Refreshment of Typology of Money Laundering Crimes (TPPU)/Terrorism Financing Crimes (TPPT)/Proliferation Financing of Weapons of Mass Destruction (PPSPM) through Credit and Treasury (by PT Andara Sarana); • Expert Sharing Session: Opportunities and Challenges of Bank Financing in Multi Finance Business Model (by Indonesian Financing Company Association).
David Fisher Kusnadi	Kepala Divisi SME I & *Consumer Banking* Head of SME I & Consumer Banking Division	• *Expert Sharing*: Keuangan Berkelanjutan (oleh Bank Victoria); • *Sharing Session: Dream and Faith* (oleh Bank Victoria); • *Sharing Session*: Hargai Hidupmu (oleh Bank Victoria); • *Dealing With* VUCA *Challenges*: *Contextual Leadership Journey* (oleh Bank Victoria); • *Sharing Session: Blessing in Faithfulness* (oleh Bank Victoria); • *Sharing Session*: Menjalin Silaturahmi dalam Kebersamaan (oleh Bank Victoria); • *Training* dan *Outbond* (oleh Bank Victoria); • *Corporate Culture* dan *Service* (oleh Bank Victoria); • *Training* Sosialisasi Office 365 (oleh Bank Victoria); • Program Pengkinian Sertifikasi Manajemen Risiko Jenjang 7 (oleh Efektif Pro); • *Sharing Session:* Bangkit dari Keterpurukan (oleh Bank Victoria); • *Sharing Session Market Update & Economic Outlook* (oleh Bank Victoria);	• Expert Sharing: Sustainable Finance (by Bank Victoria); • Sharing Session: Dream and Faith (by Bank Victoria); • Sharing Session: Valuing Your Life (by Bank Victoria); • Dealing With VUCA Challenges: Contextual Leadership Journey (by Bank Victoria); • Sharing Session: Blessing in Faithfulness (by Bank Victoria); • Sharing Session: Establishing Relationships in Togetherness (by Bank Victoria); • Training and Outbound (by Bank Victoria); • Corporate Culture and Service (by Bank Victoria); • Office 365 Dissemination Training (by Bank Victoria); • Update Program of Risk Management Certification Level 7 (by Efektif Pro); • Sharing Session: Rising from the Downturn (by Bank Victoria); • Sharing Session Market Update & Economic Outlook (by Bank Victoria);

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		• *Training* Perlindungan Konsumen dan Perlindungan Data Pribadi (oleh Victoria Institute); • *Refreshment* Manajemen Risiko Level 1 - 4 Badan Sertifikasi Manajemen Risiko (oleh Efektif Pro); • *Training* Analisa Laporan Keuangan Industri (oleh Bapak Nur Rohmat); • *Training* Penerapan Strategi *Anti-Fraud* (oleh Victoria Institute); • *Refrehsment* Tipologi Tindak Pidana Pencucian Uang (TPPU)/Tindak Pidana Pendanaan Terorisme (TPPT)/ Pendanaan Proliferasi Senjata Pemusnah Massal (PPSPM) Melalui Kredit dan *Treasury* (oleh PT Andara Sarana); serta • *Expert Sharing Session*: Peluang dan Tantangan Pembiayaan Bank pada Bisnis Model *Multi Finance* (oleh Asosiasi Perusahaan Pembiayaan Indonesia).	• Training on Consumer Protection and Personal Data Protection (by Victoria Institute); • Refreshment of Risk Management Level 1 - 4 Risk Management Certification Institution (by Efektif Pro); • Training on Analysis of Industrial Financial Statements (by Mr. Nur Rohmat); and • Training on Anti-Fraud Strategy Implementation (by Victoria Institute); • Refreshment of Typology of Money Laundering Crimes (TPPU)/Terrorism Financing Crimes (TPPT)/Proliferation Financing of Weapons of Mass Destruction (PPSPM) through Credit and Treasury (by PT Andara Sarana); and • Expert Sharing Session: Opportunities and Challenges of Bank Financing in Multi Finance Business Model (by Indonesian Financing Company Association).
Angeline	Kepala Divisi SME II *Banking* Head of SME II Banking Division	• *Training* Sosialisasi Office 365 (oleh Bank Victoria); • *Anti-Fraud* (oleh HD Entertainment); • *Training Induction Program* (oleh Bank Victoria); • *Sharing Session Market Update & Economic Outlook* (oleh Bank Victoria); • *Training* Perlindungan Konsumen dan Perlindungan Data Pribadi (oleh Victoria Institute); • Uji Sertifikasi Manajemen Risiko Jenjang 5 (oleh Lembaga Sertifikasi Profesional Perbankan); • *Training* Analisa Laporan Keuangan Industri (oleh Bapak Nur Rohmat); • *Expert Sharing Session*: Peluang dan Tantangan Pembiayaan Bank pada Bisnis Model *Multi Finance* (oleh Asosiasi Perusahaan Pembiayaan Indonesia); • *Training* Pembekalan Manajemen Risiko Jenjang 5 (oleh Lembaga Pengembangan Perbankan Indonesia); • *Training* Pembekalan Manajemen Risiko Jenjang 6 (oleh PT Arfaidhams Secret); serta • Uji Sertifikasi Manajemen Risiko Jenjang 6 (oleh Lembaga Sertifikasi Profesional Perbankan).	• Office 365 Dissemination Training (by Bank Victoria); • Anti-Fraud (by HD Entertainment); • Training Induction Program (by Bank Victoria); • Sharing Session Market Update & Economic Outlook (by Bank Victoria); • Training on Consumer Protection and Personal Data Protection (by Victoria Institute); • Certification Test of Risk Management Level 5 (by Banking Professionals Certification Institute); • Training on Analysis of Industrial Financial Statements (by Mr. Nur Rohmat); • Expert Sharing Session: Opportunities and Challenges of Bank Financing in Multi Finance Business Model (by Indonesian Financing Company Association); • Briefing Training on Risk Management Level 5 (by Indonesian Banking Development Institute); • Briefing Training on Risk Management Level 6 (by PT Arfaidhams Secret); and • Certification Test of Risk Management Level 6 (by Banking Professionals Certification Institute).
Franky Lazuardi	Kepala Divisi *Branch Banking Network* Head of Branch Banking Network Division	• *Sharing Session*: Semua Dimulai dari Keluarga (oleh Bank Victoria); • *Sharing Session: Learn for Release* (oleh Bank Victoria); • *Corporate Culture* dan *Service* (oleh Bank Victoria); • *Sharing Session*: Hargai Hidupmu (oleh Bank Victoria); • *Dealing With* VUCA *Challenges*: *Contextual Leadership Journey* (oleh Bank Victoria); • Pembekalan: Pendampingan dan Mekanisme Pelaksanaan Resertifikasi Manajemen Risiko Jenjang 6 (oleh Bank Victoria); • Resertifikasi Manajemen Risiko Jenjang 6 (oleh Lembaga Sertifikasi Profesi Perbankan); • *Refreshment* Unit Kompetensi Manajemen Risiko Jenjang 5 (oleh Efektif Pro); • *Sharing Session: Blessing in Faithfulness* (oleh Bank Victoria); • Sosialisasi dan *Training* Victoria Mobile (oleh Bank Victoria); • *Sharing Session*: Menjalin Silaturahmi dalam Kebersamaan (oleh Bank Victoria); • *Sharing Session*: Melawan Rasa Takut (oleh Bank Victoria); • *Sharing Session:* Bangkit dari Keterpurukan (oleh Bank Victoria); • *Fact Finding Customer Needs & Customer Profiling* (oleh Allianz); • *Training Product & Wealth* (oleh Bank Victoria); • *Awareness* Penerapan Peraturan Otoritas Jasa Keuangan Perlindungan Konsumen dan Undang-Undang Perlindungan Data Pribadi (oleh RSM Indonesia); • Resertifikasi Manajemen Risiko Jenjang 4 dan Jenjang 5 (oleh Lembaga Sertifikasi Profesi Perbankan); • *Sharing Session Market Update & Economic Outlook* (oleh Bank Victoria);	• Sharing Session: Everything Begins with Family (by Bank Victoria); • Sharing Session: Learn for Release (by Bank Victoria); • Corporate Culture and Service (by Bank Victoria); • Sharing Session: Valuing Your Life (by Bank Victoria); • Dealing With VUCA Challenges: Contextual Leadership Journey (by Bank Victoria); • Briefing: Mentoring and Mechanism for Implementing Recertification of Risk Management Level 6 (by Bank Victoria); • Recertification of Risk Management Level 6 (by Banking Profession Certification Institution); • Refreshment of Risk Management Competency Unit Level 5 (by Efektif Pro); • Sharing Session: Blessing in Faithfulness (by Bank Victoria); • Dissemination and Training of Victoria Mobile (by Bank Victoria); • Sharing Session: Establishing Relationships in Togetherness (by Bank Victoria); • Sharing Session: Fighting the Fear (by Bank Victoria); • Sharing Session: Rising from the Downturn (by Bank Victoria); • Fact Finding Customer Needs & Customer Profiling (by Allianz); • Training Product & Wealth (by Bank Victoria); • Awareness of Implementation of Financial Services Authority Regulations on Consumer Protection and Personal Data Protection Law (by RSM Indonesia); • Recertification of Risk Management Level 4 and Level 5 (by Banking Profession Certification Institution); • Sharing Session Market Update & Economic Outlook (by Bank Victoria);

Nama Name	Jabatan Position	Materi Material	
		• *Training* Perlindungan Konsumen dan Perlindungan Data Pribadi (oleh Victoria Institute); • *Refreshment* Manajemen Risiko Level 1 - 4 Badan Sertifikasi Manajemen Risiko (oleh Efektif Pro); • *Training* Penerapan Strategi *Anti-Fraud* (oleh Victoria Institute); serta • *Refrehsment* Tipologi Tindak Pidana Pencucian Uang (TPPU)/Tindak Pidana Pendanaan Terorisme (TPPT)/ Pendanaan Proliferasi Senjata Pemusnah Massal (PPSPM) Melalui Kredit dan *Treasury* (oleh PT Andara Sarana).	• Training on Consumer Protection and Personal Data Protection (by Victoria Institute); • Refreshment of Risk Management Level 1 - 4 Risk Management Certification Institution (by Efektif Pro); • Training on Anti-Fraud Strategy Implementation (by Victoria Institute); and • Refreshment of Typology of Money Laundering Crimes (TPPU)/Terrorism Financing Crimes (TPPT)/Proliferation Financing of Weapons of Mass Destruction (PPSPM) through Credit and Treasury (by PT Andara Sarana).
Andri Ramunanda	Kepala Divisi *Loan & Trade Operations* Head of Loan & Trade Operations Division	• *Expert Sharing*: Keuangan Berkelanjutan (oleh Bank Victoria); • *Dealing With* VUCA *Challenges*: *Contextual Leadership Journey* (oleh Bank Victoria); • Biaya Grab Appraisal Manado (oleh Bank Victoria); • *Corporate Culture* dan *Service* (oleh Bank Victoria); • *Sharing Session*: Menjalin Silaturahmi dalam Kebersamaan (oleh Bank Victoria); • *Training* Sosialisasi Office 365 (oleh Bank Victoria); • Resertifikasi Manajemen Risiko Jenjang 4 (oleh Lembaga Sertifikasi Profesi Perbankan); • *Sharing Session Market Update & Economic Outlook* (oleh Bank Victoria); • *Training* Perlindungan Konsumen dan Perlindungan Data Pribadi (oleh Victoria Institute); • Uji Sertifikasi Manajemen Risiko Jenjang 5 (oleh Bank Victoria); • *Training* Penerapan Strategi *Anti-Fraud* (oleh Victoria Institute); • *Refrehsment* Tipologi Tindak Pidana Pencucian Uang (TPPU)/Tindak Pidana Pendanaan Terorisme (TPPT)/ Pendanaan Proliferasi Senjata Pemusnah Massal (PPSPM) Melalui Kredit dan *Treasury* (oleh PT Andara Sarana); serta • *Training* Pembekalan Manajemen Risiko Jenjang 5 (oleh Lembaga Pengembangan Perbankan Indonesia).	• Expert Sharing: Sustainable Finance (by Bank Victoria); • Dealing With VUCA Challenges: Contextual Leadership Journey (by Bank Victoria); • Cost of Grab Appraisal Manado (by Bank Victoria); • Corporate Culture and Service (by Bank Victoria); • Sharing Session: Establishing Relationships in Togetherness (by Bank Victoria); • Office 365 Dissemination Training (by Bank Victoria); • Recertification of Risk Management Level 4 (by Banking Profession Certification Institution); • Sharing Session Market Update & Economic Outlook (by Bank Victoria); • Training on Consumer Protection and Personal Data Protection (by Victoria Institute); • Certification Test of Risk Management Level 5 (by Bank Victoria); • Training on Anti-Fraud Strategy Implementation (by Victoria Institute); • Refreshment of Typology of Money Laundering Crimes (TPPU)/Terrorism Financing Crimes (TPPT)/Proliferation Financing of Weapons of Mass Destruction (PPSPM) through Credit and Treasury (by PT Andara Sarana); and • Briefing Training on Risk Management Level 5 (by Indonesian Banking Development Institute).
Sonny Andryano	Kepala Divisi *Special Asset Management* Head of Special Asset Management Division	• *Expert Sharing*: Keuangan Berkelanjutan (oleh Bank Victoria); • *Dealing With* VUCA *Challenges*: *Contextual Leadership Journey* (oleh Bank Victoria); • *Sharing Session*: Menjalin Silaturahmi dalam Kebersamaan (oleh Bank Victoria); • *Corporate Culture* dan *Service* (oleh Bank Victoria); • *Training* Sosialisasi Office 365 (oleh Bank Victoria); • Training Sertifikat Elektronik (oleh Kantor Notaris dan Pejabat Pembuat Akta Tanah); • *Sharing Session Market Update & Economic Outlook* (oleh Bank Victoria); • *Training* Perlindungan Konsumen dan Perlindungan Data Pribadi (oleh Victoria Institute); • *Training* Penundaan Kewajiban Pembayaran Utang (PKPU) (oleh FKNK Law Firm); • Uji Sertifikasi Manajemen Risiko Jenjang 5 (oleh Lembaga Sertifikasi Profesional Perbankan); • *Training* Penerapan Strategi *Anti-Fraud* (oleh Victoria Institute); • *Refrehsment* Tipologi Tindak Pidana Pencucian Uang (TPPU)/Tindak Pidana Pendanaan Terorisme (TPPT)/ Pendanaan Proliferasi Senjata Pemusnah Massal (PPSPM) Melalui Kredit dan *Treasury* (oleh PT Andara Sarana); serta • *Training* Pembekalan Manajemen Risiko Jenjang 5 (oleh Lembaga Pengembangan Perbankan Indonesia).	• Expert Sharing: Sustainable Finance (by Bank Victoria); • Dealing With VUCA Challenges: Contextual Leadership Journey (by Bank Victoria); • Sharing Session: Establishing Relationships in Togetherness (by Bank Victoria); • Corporate Culture and Service (by Bank Victoria); • Office 365 Dissemination Training (by Bank Victoria); • Electronic Certificate Training (by Notary Office and Land Deed Officials); • Sharing Session Market Update & Economic Outlook (by Bank Victoria); • Training on Consumer Protection and Personal Data Protection (by Victoria Institute); • Training on Debt Payment Suspension (PKPU) (by FKNK Law Firm); • Certification Test of Risk Management Level 5 (by Banking Professionals Certification Institute); • Training on Anti-Fraud Strategy Implementation (by Victoria Institute); • Refreshment of Typology of Money Laundering Crimes (TPPU)/Terrorism Financing Crimes (TPPT)/Proliferation Financing of Weapons of Mass Destruction (PPSPM) through Credit and Treasury (by PT Andara Sarana); and • Briefing Training on Risk Management Level 5 (by Indonesian Banking Development Institute).

Nama Name	Jabatan Position	Materi Material	
Syahda Candra	Kepala Divisi *Human Capital Management & General Affair* Head of Human Capital Management & General Affair Division	• *Expert Sharing*: Keuangan Berkelanjutan (oleh Bank Victoria); • *Dealing With* VUCA *Challenges*: *Contextual Leadership Journey* (oleh Bank Victoria); • *Refreshment* Unit Kompetensi Manajemen Risiko Jenjang 5 (oleh Efektif Pro); • Pembekalan: Pendampingan dan Mekanisme Pelaksanaan Resertifikasi Manajemen Risiko Jenjang 5 (oleh Bank Victoria); • *Sharing Session*: Menjalin Silaturahmi dalam Kebersamaan (oleh Bank Victoria); • *Training* Sosialisasi Office 365 (oleh Bank Victoria); • Resertifikasi Manajemen Risiko Jenjang 5 (oleh Lembaga Sertifikasi Profesi Perbankan); • *Sharing Session Market Update & Economic Outlook* (oleh Bank Victoria); • *Training* Perlindungan Konsumen dan Perlindungan Data Pribadi (oleh Victoria Institute); • *Fraud Risk Management* Sebagai Upaya Mitigasi *Fraud* yang Efektif dan Penerapan Strategi *Anti-Fraud* di Lembaga Jasa Keuangan Sesuai Peraturan Otoritas Jasa Keuangan No. 12/2024 (oleh Lembaga Pengembangan Perbankan Indonesia); • Webinar Mengelola Data Karyawan Pasca Berlakunya Undang-Undang Perlindungan Data Pribadi (oleh Dunia HR); • Iuran Keanggotaan Forum *Human Capital* Perbankan Indonesia 2024 (oleh Forum Human Capital Perbankan Indonesia); • *Refrehsment* Tipologi Tindak Pidana Pencucian Uang (TPPU)/Tindak Pidana Pendanaan Terorisme (TPPT)/ Pendanaan Proliferasi Senjata Pemusnah Massal (PPSPM) Melalui Kredit dan *Treasury* (oleh PT Andara Sarana); serta • *Training Indonesia Human Capital Beyond & Summit* (oleh QuBisa Anugrah Indonesia).	• Expert Sharing: Sustainable Finance (by Bank Victoria); • Dealing With VUCA Challenges: Contextual Leadership Journey (by Bank Victoria); • Refreshment of Risk Management Competency Unit Level 5 (by Efektif Pro); • Briefing: Mentoring and Mechanism for Implementing Recertification of Risk Management Level 5 (by Bank Victoria); • Sharing Session: Establishing Relationships in Togetherness (by Bank Victoria); • Office 365 Dissemination Training (by Bank Victoria); • Recertification of Risk Management Level 5 (by Banking Profession Certification Institution); • Sharing Session Market Update & Economic Outlook (by Bank Victoria); • Training on Consumer Protection and Personal Data Protection (by Victoria Institute); • Fraud Risk Management as Effective Fraud Mitigation Effort and Implementation of Anti-Fraud Strategies in Financial Services Institutions According to Financial Services Authority Regulation No. 12/2024 (by Indonesian Banking Development Institute); • Webinar on Managing Employee Data After the Enactment of Personal Data Protection Law (by Dunia HR); • Membership Fees for Human Capital Forum of Indonesian Banking 2024 (by Human Capital Forum of Indonesian Banking); • Refreshment of Typology of Money Laundering Crimes (TPPU)/Terrorism Financing Crimes (TPPT)/Proliferation Financing of Weapons of Mass Destruction (PPSPM) through Credit and Treasury (by PT Andara Sarana); and • Training Indonesia Human Capital Beyond & Summit (by QuBisa Anugrah Indonesia).
Handy Widjaja	Kepala Divisi *Accounting* Head of Accounting Division	• Implementasi ATMR Risiko Pasar (Basel III Reforms/ FRTB) *Standard Approach* (SA) dan *Simplified Standard Approach* (SSA) (Surat Edaran Otorita Jasa Keuangan No. 23/SEOJK.03/2022) (oleh Infobank Institute); • *Training* Sosialisasi Office 365 (oleh Bank Victoria); • *Anti-Fraud* (oleh HD Entertainment); • *Power Business Intelligence* (oleh Purwadhika); • *Creative Power Point* (oleh PT Alam Cipta Gemilang); • Pembekalan Manajemen Risiko Jenjang 4 (oleh Lembaga Pengembangan Perbankan Indonesia); • *Sharing Session Market Update & Economic Outlook* (oleh Bank Victoria); • Sertifikasi dan Resertifikasi Manajemen Risiko Jenjang 4 dan Jenjang 5 (oleh Lembaga Sertifikasi Profesi Perbankan); • *Training* Perlindungan Konsumen dan Perlindungan Data Pribadi (oleh Victoria Institute); • Uji Sertifikasi Manajemen Risiko Jenjang 5 (oleh Lembaga Sertifikasi Profesi Perbankan); • *Refrehsment* Tipologi Tindak Pidana Pencucian Uang (TPPU)/Tindak Pidana Pendanaan Terorisme (TPPT)/ Pendanaan Proliferasi Senjata Pemusnah Massal (PPSPM) Melalui Kredit dan *Treasury* (oleh PT Andara Sarana); serta • *Training* Pembekalan Manajemen Risiko Jenjang 5 (oleh Lembaga Pengembangan Perbankan Indonesia).	• Implementation of Market Risk RWA (Basel III Reforms/ FRTB) Standard Approach (SA) and Simplified Standard Approach (SSA) (Financial Services Authority Circular No. 23/SEOJK.03/2022) (by Infobank Institute); • Office 365 Dissemination Training (by Bank Victoria); • Anti-Fraud (by HD Entertainment); • Power Business Intelligence (by Purwadhika); • Creative Power Point (by PT Alam Cipta Gemilang); • Briefing of Risk Management Level 4 (by Indonesian Banking Development Institute); • Sharing Session Market Update & Economic Outlook (by Bank Victoria); • Certification and Recertification of Risk Management Level 4 and Level 5 (by Banking Profession Certification Institution); • Training on Consumer Protection and Personal Data Protection (by Victoria Institute); • Certification Test of Risk Management Level 5 (by Banking Profession Certification Institution); • Refreshment of Typology of Money Laundering Crimes (TPPU)/Terrorism Financing Crimes (TPPT)/Proliferation Financing of Weapons of Mass Destruction (PPSPM) through Credit and Treasury (by PT Andara Sarana); and • Briefing Training on Risk Management Level 5 (by Indonesian Banking Development Institute).

Nama Name	Jabatan Position	Materi Material	
Bambang F Triatmojo	Wakil Kepala Divisi *Credit Monitoring & Collection* Vice Head of Credit Monitoring & Collection Division	• *Expert Sharing*: Keuangan Berkelanjutan (oleh Bank Victoria); • *Dealing With* VUCA *Challenges*: *Contextual Leadership Journey* (oleh Bank Victoria); • *Refreshment* Unit Kompetensi Manajemen Risiko Jenjang 5 (oleh Efektif Pro); • Pembekalan: Pendampingan dan Mekanisme Pelaksanaan Resertifikasi Manajemen Risiko Jenjang 5 (oleh Bank Victoria); • *Sharing Session*: Menjalin Silaturahmi dalam Kebersamaan (oleh Bank Victoria); • *Corporate Culture* dan *Service* (oleh Bank Victoria); • *Training* Sosialisasi Office 365 (oleh Bank Victoria); • *Training* Sertifikat Elektronik (oleh Kantor Notaris dan Pejabat Pembuat Akta Tanah); • *Sharing Session Market Update & Economic Outlook* (oleh Bank Victoria); • *Training* Perlindungan Konsumen dan Perlindungan Data Pribadi (oleh Victoria Institute); • *Refreshment* Manajemen Risiko Level 1 - 4 Badan Sertifikasi Manajemen Risiko (oleh Efektif Pro); • *Training* Penerapan Strategi *Anti-Fraud* (oleh Victoria Institute); • *Training* Penundaan Kewajiban Pembayaran Utang (PKPU) (oleh FKNK Law Firm); • *Training* Analisa Laporan Keuangan Industri (oleh Bapak Nur Rohmat); • *Refrehsment* Tipologi Tindak Pidana Pencucian Uang (TPPU)/Tindak Pidana Pendanaan Terorisme (TPPT)/ Pendanaan Proliferasi Senjata Pemusnah Massal (PPSPM) Melalui Kredit dan *Treasury* (oleh PT Andara Sarana); serta • *Expert Sharing Session*: Peluang dan Tantangan Pembiayaan Bank pada Bisnis Model *Multi Finance* (oleh Asosiasi Perusahaan Pembiayaan Indonesia).	• Expert Sharing: Sustainable Finance (by Bank Victoria); • Dealing With VUCA Challenges: Contextual Leadership Journey (by Bank Victoria); • Refreshment of Risk Management Competency Unit Level 5 (by Efektif Pro); • Briefing: Mentoring and Mechanism for Implementing Recertification of Risk Management Level 5 (by Bank Victoria); • Sharing Session: Establishing Relationships in Togetherness (by Bank Victoria); • Corporate Culture and Service (by Bank Victoria); • Office 365 Dissemination Training (by Bank Victoria); • Electronic Certificate Training (by Notary Office and Land Deed Officials); • Sharing Session Market Update & Economic Outlook (by Bank Victoria); • Training on Consumer Protection and Personal Data Protection (by Victoria Institute); • Refreshment of Risk Management Level 1 - 4 Risk Management Certification Institution (by Efektif Pro); • Training on Anti-Fraud Strategy Implementation (by Victoria Institute); • Training on Debt Payment Suspension (PKPU) (by FKNK Law Firm); • Training on Analysis of Industrial Financial Statements (by Mr. Nur Rohmat); • Refreshment of Typology of Money Laundering Crimes (TPPU)/Terrorism Financing Crimes (TPPT)/Proliferation Financing of Weapons of Mass Destruction (PPSPM) through Credit and Treasury (by PT Andara Sarana); and • Expert Sharing Session: Opportunities and Challenges of Bank Financing in Multi Finance Business Model (by Indonesian Financing Company Association).
Yusuf Doi Pratama	Kepala Departemen *Anti Money Laundering* (AML), *Counter Terorist Financing* (CTF) & *Weapon Mass Destruction* (WMD) Head of Anti Money-Laundering (AML), Counter-Terrorist Financing (CTF) & Weapon Mass Destruction (WMD) Department	• Pelatihan Paralegal (oleh Peradi Utama); • *Dealing With* VUCA *Challenges*: *Contextual Leadership Journey* (oleh Bank Victoria); • *Refreshment* Unit Kompetensi Manajemen Risiko Jenjang 5 (oleh Efektif Pro); • *Sharing Session*: Menjalin Silaturahmi dalam Kebersamaan (oleh Bank Victoria); • *Corporate Culture* dan *Service* (oleh Bank Victoria); • *Training* Sosialisasi Office 365 (oleh Bank Victoria); • *Sharing Session Market Update & Economic Outlook* (oleh Bank Victoria); • Sertifikasi dan Resertifikasi Manajemen Risiko Jenjang 4 dan Jenjang 5 (oleh Lembaga Sertifikasi Profesi Perbankan); • *Training* Perlindungan Konsumen dan Perlindungan Data Pribadi (oleh Victoria Institute); • *Refreshment* Manajemen Risiko Level 1 - 4 Badan Sertifikasi Manajemen Risiko (oleh Efektif Pro); serta • *Training* Penerapan Strategi *Anti-Fraud* (oleh Victoria Institute).	• Training on Paralegal (by Peradi Utama); • Dealing With VUCA Challenges: Contextual Leadership Journey (by Bank Victoria); • Refreshment of Risk Management Competency Unit Level 5 (by Efektif Pro); • Sharing Session: Establishing Relationships in Togetherness (by Bank Victoria); • Corporate Culture and Service (by Bank Victoria); • Office 365 Dissemination Training (by Bank Victoria); • Sharing Session Market Update & Economic Outlook (by Bank Victoria); • Certification and Recertification of Risk Management Level 4 and Level 5 (by Banking Profession Certification Institution); • Training on Consumer Protection and Personal Data Protection (by Victoria Institute); • Refreshment of Risk Management Level 1 - 4 Risk Management Certification Institution (by Efektif Pro); and • Training on Anti-Fraud Strategy Implementation (by Victoria Institute).

Nama Name	Jabatan Position	Materi Material	
Joel Eka Martono Krissata	Kepala Departemen *Anti-Fraud* Head of Anti-Fraud Department	• *Corporate Culture* dan *Service* (oleh Bank Victoria); • *Sharing Session*: Hargai Hidupmu (oleh Bank Victoria); • Pembekalan: Pendampingan dan Mekanisme Pelaksanaan Resertifikasi Manajemen Risiko Jenjang 6 (oleh Bank Victoria); • *Refreshment* Unit Kompetensi Manajemen Risiko Jenjang 5 (oleh Efektif Pro); • *Sharing Session: Blessing in Faithfulness* (oleh Bank Victoria); • *Workshop*: Identifikasi Transaksi Keuangan Mencurigakan (oleh Forum Komunikasi Direktur Kepatuhan Perbankan); • *Sharing Session*: Hidup Lebih Bermakna (oleh Bank Victoria); • *Sharing Session*: Menjalin Silaturahmi dalam Kebersamaan (oleh Bank Victoria); • *Sharing Session*: Melawan Rasa Takut (oleh Bank Victoria); • *Sharing Session*: Bersyukur dalam Kehidupan (oleh Bank Victoria); • *Training* Sosialisasi Office 365 (oleh Bank Victoria); • Resertifikasi Manajemen Risiko Jenjang 7 (oleh Lembaga Sertifikasi Profesi Perbankan); • *Sharing Session*: Perubahan Paradigma (oleh Bank Victoria); • *Sharing Session*: Bangkit dari Keterpurukan (oleh Bank Victoria); • *Awareness* Penerapan Peraturan Otoritas Jasa Keuangan Perlindungan Konsumen dan Undang-Undang Perlindungan Data Pribadi (oleh RSM Indonesia); • *Indonesia National Anti-Fraud Conference* (oleh Asia Anti-Fraud Manajemen); • *Training* Pengujian Keamanan *Cyber* (*Table Top Exercise*) (oleh SecurXcess); • *Sharing Session Market Update & Economic Outlook* (oleh Bank Victoria); • *Training* Perlindungan Konsumen dan Perlindungan Data Pribadi (oleh Victoria Institute); • *Training* Praktik Manajemen Audit Internal Sesuai dengan Institute of Internal Auditors (IIA) Global Internal Audit Standar 2024 (oleh Universitas Gadjah Mada); • *Training* dan Uji Sertifikasi *Certified Anti-Fraud Professional* (CAFP) (oleh GRC Management); • *Fraud Risk Management* Sebagai Upaya Mitigasi *Fraud* yang Efektif dan Penerapan Strategi *Anti-Fraud* di Lembaga Jasa Keuangan Sesuai Peraturan Otoritas Jasa Keuangan No. 12/2024 (oleh Lembaga Pengembangan Perbankan Indonesia); • *Refreshment* Manajemen Risiko Level 1 - 4 Badan Sertifikasi Manajemen Risiko (oleh Efektif Pro); • Seminar, *Workshop*, dan Uji Kompetensi Audit Berbasis Aplikasi, Klaster Pemeriksaan Informasi Keuangan (oleh Perbanas Institute Jakarta); serta • Sosialisasi/*Focus Group Discussion Compliance Champion* - Budaya Kepatuhan (oleh Bank Victoria).	• Corporate Culture and Service (by Bank Victoria); • Sharing Session: Valuing Your Life (by Bank Victoria); • Briefing: Mentoring and Mechanism for Implementing Recertification of Risk Management Level 6 (by Bank Victoria); • Refreshment of Risk Management Competency Unit Level 5 (by Efektif Pro); • Sharing Session: Blessing in Faithfulness (by Bank Victoria); • Workshop: Identification of Suspicious Financial Transactions (by Communication Forum for Director of Banking Compliance); • Sharing Session: A More Meaningful Life (by Bank Victoria); • Sharing Session: Establishing Relationships in Togetherness (by Bank Victoria); • Sharing Session: Fighting the Fear (by Bank Victoria); • Sharing Session: Being Grateful in Life (by Bank Victoria); • Office 365 Dissemination Training (by Bank Victoria); • Recertification of Risk Management Level 7 (by Banking Profession Certification Institution); • Sharing Session: Paradigm Shift (by Bank Victoria); • Sharing Session: Rising from the Downturn (by Bank Victoria); • Awareness of Implementation of Financial Services Authority Regulations on Consumer Protection and Personal Data Protection Law (by RSM Indonesia); • Indonesia National Anti-Fraud Conference (by Asia Anti-Fraud Management); • Cyber Security Testing Training (Table Top Exercise) (by SecurXcess); • Sharing Session Market Update & Economic Outlook (by Bank Victoria); • Training on Consumer Protection and Personal Data Protection (by Victoria Institute); • Training on Internal Audit Management Practice in Accordance with the Institute of Internal Auditors (IIA) Global Internal Audit Standard 2024 (by Gadjah Mada University); • Certified Anti-Fraud Professional (CAFP) Training and Certification Test (by GRC Management); • Fraud Risk Management as Effective Fraud Mitigation Effort and Implementation of Anti-Fraud Strategies in Financial Services Institutions According to Financial Services Authority Regulation No. 12/2024 (by Indonesian Banking Development Institute); • Refreshment of Risk Management Level 1 - 4 Risk Management Certification Institution (by Efektif Pro); • Seminar, Workshop, and Competency Test of Application-Based Audit, Financial Information Examination Cluster (by Perbanas Institute Jakarta); and • Dissemination/Focus Group Discussion on Compliance Champion - Compliance Culture (by Bank Victoria).

Profil Kepala Kantor Cabang Utama

Profile of Main Branch Office Head

Jane Alexandra Herman Pemimpin KCU BIP Head of BIP Main Branch Office	**Nerly Sugianto** Pemimpin KCU Senayan Head of Senayan Main Branch Office	**Amelia** Pemimpin KCU Cideng Head of Cideng Main Branch Office
Rosina Pemimpin KCU Kelapa Gading 1 Head of Kelapa Gading 1 Main Branch Office	**Rosita B Rajaisun** Pemimpin KCU Bogor Head of Bogor Main Branch Office	**Erli Nornawati** Pemimpin KCU Surabaya Head of Surabaya Main Branch Office
Tjioe Dedy Himawan Pemimpin KCU Semarang Head of Semarang Main Branch Office	**Wiwi Candra** Pemimpin KCU Medan Head of Medan Main Branch Office	**Febyra Asia Rini** Pemimpin KCU Solo Head of Solo Main Branch Office
Daisy Merry Natalia Pemimpin KCU Manado Head of Manado Main Branch Office	**I Gusti Putu Sridana Sastrawan** Pemimpin KCU Bali Head of Bali Main Branch Office	

Komposisi Pemegang Saham [POJK C.3]

Shareholders Composition

Uraian Description	31 Desember 2024 31 December 2024			1 Januari 2024 1 January 2024		
	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total (Rp)	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total (Rp)
Saham dengan Sertifikat Kolektif **Shares with Collective Certificates**						
Pemegang Saham Pendiri Founders Shares	-	-	-	-	-	-
Masyarakat Public						
Pemodal Nasional National Investor						
5% atau lebih **5% or more**	-	-	-	-	-	-
Lainnya Others	**1,165,500**	**0.01**	**116,550,000**	1,165,500	0.01	116,550,000
Pemodal Asing Foreign Investors						
5% atau lebih **5% or more**	-	-	-	-	-	-
Lainnya Others	**24,500**	**0.00**	**2,450,000**	24,500	0.00	2,450,000
Sub Total	**1,190,000**	**0.01**	**119,000,000**	**1,190,000**	**0.01**	**119,000,000**
Saham dengan Penitipan Kolektif PT Kustodian Sentral Efek Indonesia **Shares in Collective Custody with PT Kustodian Sentral Efek Indonesia**						
Pemegang Saham Pendiri Founders Shares						
PT Nata Patindo	**48,823,665**	**0.31**	**4,882,366,500**	48,823,665	0.31	4,882,366,500

Uraian Description	31 Desember 2024 31 December 2024			1 Januari 2024 1 January 2024		
	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total (Rp)	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total (Rp)
Masyarakat Public						
Pemodal Nasional National Investor						
5% atau lebih **5% or more**						
Suzanna Tanojo	**3,066,411,303**	**19.35**	**306,641,130,300**	3,066,411,303	19.35	306,641,130,300
PT Victoria Investama Tbk	**7,010,537,747**	**44.23**	**701,053,774,700**	7,010,537,747	44.23	701,053,774,700
Lainnya Others	**3,491,811,401**	**22.03**	**349,181,140,100**	3,465,000,172	21.86	346,500,017,200
Pemodal Asing Foreign Investors						
5% atau lebih **5% or more**						
Lainnya Others	**2,229,758,790**	**14.07**	**222,975,879,000**	2,256,563,790	14.24	225,656,379,000
Sub Total	**15,847,342,906**	**99.99**	**1,584,734,290,600**	**15,847,336,677**	**99.99**	**1,584,733,667,700**
Total	**15,848,532,906**	**100.00**	**1,584,853,290,600**	**15,848,526,677**	**100.00**	**1,584,852,667,700**

Komposisi Pemegang Saham yang Memiliki 5% atau Lebih Saham

Composition of Shareholders with 5% or More Shares

Uraian Desciption	31 Desember 2024 31 December 2024		1 Januari 2024 1 January 2024	
	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)
PT Victoria Investama Tbk	**7,010,537,747**	**44.23**	7,010,537,747	44.23
Suzanna Tanojo	**3,066,411,303**	**19.35**	3,066,411,303	19.35
Total	**10,076,949,050**	**63.58**	**10,076,949,050**	**63.58**

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

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

Tidak terdapat anggota Dewan Komisaris dan anggota Direksi Bank yang tercatat sebagai Pemegang Saham Bank Victoria, baik secara langsung maupun tidak langsung pada awal dan akhir tahun 2024.

There are no members of Board of Commissioners or members of Board of Directors of the Bank listed as Shareholders of Bank Victoria, either directly or indirectly at the beginning and end of 2024.

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

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

Uraian	31 Desember 2024 31 December 2024		1 Januari 2024 1 January 2024		Description
	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	
Pemodal Nasional National Investors					
Perorangan	**1,319,317,235**	**8.32**	1,300,561,817	8.21	Individuals
Perseroan Terbatas	**1,634,441,754**	**10.31**	1,611,822,654	10.17	Limited Liability Companies
Asuransi	**164,920,000**	**1.04**	281,340,000	1.78	Insurance
Reksa Dana	**915,000**	**0.01**	15,000	0.00	Mutual Funds
Broker	**422,206,577**	**2.66**	320,286,567	2.02	Broker
Pemodal Asing Foreign Investors					
Perorangan	**242,031,715**	**1.53**	245,660,115	1.55	Individuals
Institusi Asing	**1,987,751,575**	**12.54**	2,011,600,575	12.69	Foreign Institutions
Total	**5,771,583,856**	**36.42**	**5,771,286,728**	**36.42**	**Total**

Komposisi Pemegang Saham Berdasarkan Status Kepemilikan

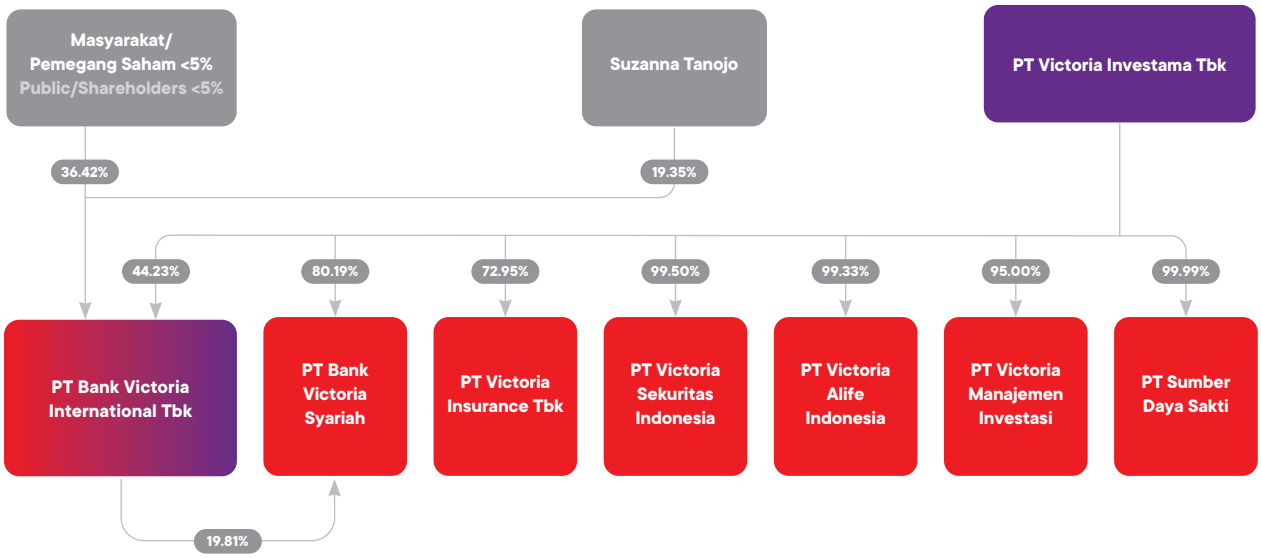
Shareholders Composition by Ownership Status

Uraian	31 Desember 2024 31 December 2024			1 Januari 2024 1 January 2024			Description
	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total Investor	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total Investor	
SCRIPTLESS							
Pemodal Nasional							National Investors
Perorangan	**4,384,666,538**	**27.67**	**7,137**	4,365,911,120	27.55	7,862	Individuals
Perseroan Terbatas	**8,644,979,001**	**54.55**	**32**	8,622,359,901	54.41	30	Limited Liability Companies
Broker	**422,206,577**	**2.66**	**6**	320,286,567	2.02	7	Broker
Mutual Fund	**900,000**	**0.01**	**1**	-	-	-	Mutual Fund
Asuransi	**164,832,000**	**1.04**	**2**	281,252,000	1.77	3	Insurance
Pemodal Asing							Foreign Investors
Perorangan	**242,007,215**	**1.53**	**10**	245,635,615	1.55	10	Individual
Institusi Asing	**1,987,751,575**	**12.54**	**18**	2,011,600,575	12.69	21	Foreign Institutions

Uraian	31 Desember 2024 31 December 2024			1 Januari 2024 1 January 2024			Description
	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total Investor	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total Investor	
SCRIPT							
Pemodal Nasional							National Investors
Perorangan	**1,062,000**	**0,01**	**132**	1,062,000	0.01	132	Individuals
Perseroan Terbatas	**500**	**0,00**	**1**	500	0.00	1	Limited Liability Companies
Reksa Dana	**15,000**	**0,00**	**1**	15,000	0.00	1	Mutual Fund
Asuransi	**88,000**	**0,00**	**3**	88,000	0.00	3	Insurance
Pemodal Asing							Foreign Investors
Perorangan	**24,500**	**0,00**	**7**	24,500	0.00	7	Individual
Institusi Asing	**-**	**-**	**-**	-	-	-	Foreign Institutions
Total	**15,848,532,906**	**100.00**	**7,350**	**15,848,235,778**	**100.00**	**8,077**	**Total**

Struktur Pemegang Saham Utama dan Pengendali

Main and Controlling Shareholders Structure



Per 31 Desember 2024, Pemegang Saham Utama dan Pengendali Bank Victoria adalah PT Victoria Investama Tbk merupakan Pemegang Saham Pengendali Perseroan dengan kepemilikan saham mencapai 44,23%, sedangkan penerima manfaat akhir adalah Suzanna Tanojo.

As of 31 December 2024, the Main and Controlling Shareholder of Bank Victoria is PT Victoria Investama Tbk with 44.23% share ownership, while the ultimate beneficiary is Suzanna Tanojo.

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

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

Pada tahun 2024, Bank Victoria tidak memiliki Entitas Anak, perusahaan ventura bersama, dan *special purpose vehicle*, namun memiliki 1 (satu) Entitas Asosiasi. Informasi terkait Entitas Asosiasi Bank diuraikan sebagai berikut:

In 2024, Bank Victoria did not have any Subsidiary, joint venture company, or special purpose vehicle, but had 1 (one) Associated Entity. Information on the Bank's Associated Entity is described as follows:

PT Bank Victoria Syariah	
Alamat Address	Gedung Graha BIP Lantai 5 Graha BIP Building 5th Floor Jl. Gatot Subroto Kav. 23 Karet Semanggi, Setiabudi Jakarta Selatan / South Jakarta 12930 T : (021) 5600 467 (021) 5225 285 (*Hunting*) F : (021) 5664 247 E : corsec@bankvictoriasyariah.co.id W : www.bankvictoriasyariah.co.id
Bidang Usaha Line of Business	Perbankan Syariah Sharia Banking
Tahun Beroperasi Year of Operations	Beroperasi sejak 1966 Has been in operation since 1966
Domisili Domicile	Jakarta
Total Aset (dalam juta) Total Assets (in million)	Rp3,314,468
Kepemilikan Saham Share Ownership	19.81%
Manajemen Kunci Key Management	Komisaris Utama : Sari Idayanti Komisaris Independen : Retno Dwiyanti W. Komisaris Independen : Edian Fahmy Direktur Utama : Dery Januar Direksi : Andy Sundoro Direktur Kepatuhan : Ruly Dwi Rahayu President Commissioner : Sari Idayanti Independent Commissioner : Retno Dwiyanti W. Independent Commissioner : Edian Fahmy President Director : Dery Januar Director : Andy Sundoro Compliance Director : Ruly Dwi Rahayu

Kronologi Pencatatan Saham
Chronology of Share Listing

Kronologis pencatatan saham Bank Victoria sejak dilakukannya penawaran umum perdana saham pada tahun 1999 hingga akhir tahun 2024 tersaji secara rinci pada tabel berikut:

The chronology of Bank Victoria's share listing since the initial public offering in 1999 until the end of 2024 is presented in detail in the following table:

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

Uraian Description	Tanggal Pelaksanaan Exercise Date	Jumlah Saham yang Diterbitkan (Lembar Saham) Total Issued Shares (Number of Shares)	Nilai Nominal Nominal Value (Rp)	Harga Penawaran Offering Price (Rp)	Jumlah Saham Beredar (Lembar Saham) Total Outstanding Shares (Number of Shares)
Pelaksanaan Waran Seri IV dan VI Exercise of Series IV and VI Warrants	2011	81,724,314	100	100	**6,547,670,888**
Pelaksanaan Waran Seri V dan VI Exercise of Series V and VI Warrants	2012	56,673,554	100	100	**6,604,344,442**
Pelaksanaan Waran Seri V dan VI Exercise of Series V and VI Warrants	2013	25,923,831	100	100	**6,630,268,273**
Pelaksanaan Waran Seri VI Exercise of Series VI Warrants	2014	508,898,707	100	100	**7,139,166,980**
Pelaksanaan Waran Seri VI Exercise of Series VI Warrants	2015	300	100	100	**7,139,167,280**
Pelaksanaan Waran Seri VI Exercise of Series VI Warrants	2016	751,486,547	100	100	**7,890,653,827**
Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu Capital Increase Without Preemptive Rights	2016	780,394,335	100	100	**8,671,048,162**
Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu Capital Increase Without Preemptive Rights	2019	280,898,877	100	356	**8,951,947,039**
Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu Capital Increase Without Preemptive Rights	2021	586,205,939	100	160	**9,538,152,978**
Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu Capital Increase Without Preemptive Rights	2021	948,979,590	100	196	**10,487,132,568**
Penambahan Modal dengan Hak Memesan Efek Terlebih Dahulu Capital Increase with Preemptive Rights	2022	2,553,461,919	100	150	**13,040,594,487**
Penambahan Modal dengan Hak Memesan Efek Terlebih Dahulu Capital Increase with Preemptive Rights	2022	2,807,640,227	100	150	**15,848,234,714**
Pelaksanaan Waran Seri VII Exercise of Series VII Warrants	2023	1,064	100	100	**15,848,235,778**
Pelaksanaan Waran Seri VII Exercise of Series VII Warrants	2024	297,128	100	100	**29,712,800**
Total Modal Saham yang Ditempatkan dan Disetor Penuh **Total Fully Issued and Paid-Up Capital Shares**					**15,848,532,906**

Kronologi Pencatatan Efek Lainnya

Chronology of Other Securities Listing

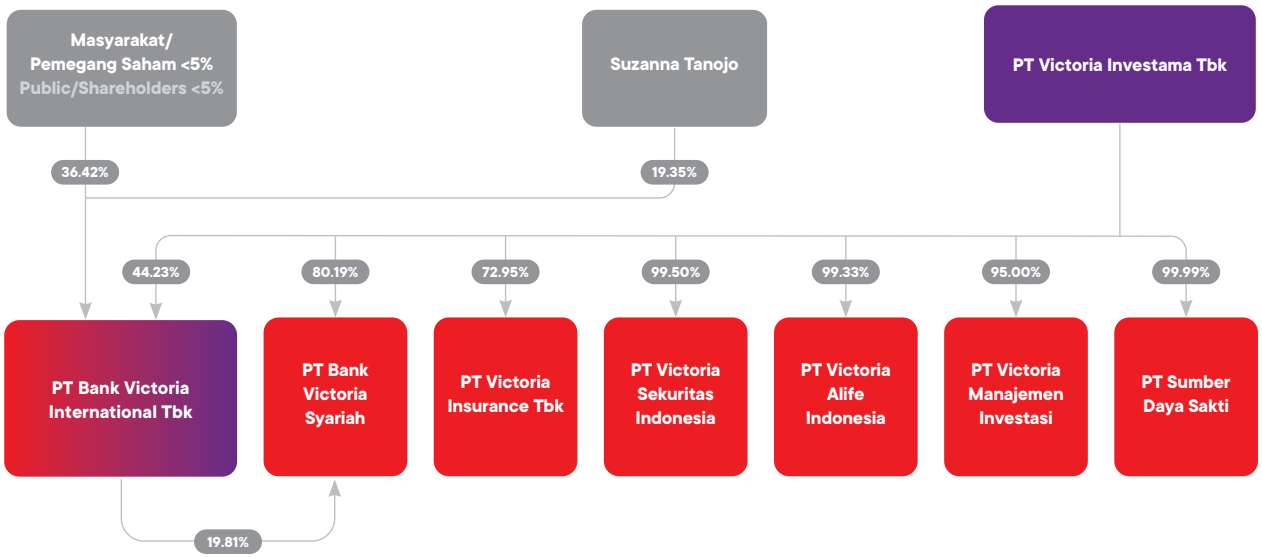
Uraian Description	Total (Juta Rupiah) Total (Million Rupiah)	Tenor (Tahun) Tenure (Year)	Tingkat Suku Bunga Interest Rates (%)	Tanggal Date	Peringkat Saat Diterbitkan Ratings at Issuance	Peringkat Terakhir Latest Ratings	Status Pembayaran Payment Status	
							Lunas Paid	Belum Lunas Not Paid
Obligasi Bank Victoria I Tahun 2000 dengan tingkat suku bunga tetap Seri A Bank Victoria Series A Bond I of 2000 at fixed interest rate	75,000	7	16.25	3 Maret 2000 - 3 Maret 2007 3 March 2000 - 3 March 2007	BBB+	BBB+	✓	-
Obligasi Bank Victoria I Tahun 2000 dengan tingkat suku bunga mengambang Seri B Bank Victoria Series B Bond I of 2000 at floating interest rate	25,000	7	16,00 (kupon bunga ke-1 dan 2) serta mengambang (kupon bunga ke-3 sampai ke-28) 16.00 (1st and 2nd interest coupon) and floating (3rd to 28th interest coupon)	3 Maret 2000 - 3 Maret 2007 3 March 2000 - 3 March 2007	BBB+	BBB+	✓	-
Obligasi Bank Victoria II Tahun 2007 dengan tingkat suku bunga tetap Bank Victoria Bond II of 2007 at fixed interest rate	200,000	5	12.00	21 Maret 2007 - 21 Maret 2012 21 March 2007 - 21 March 2012	A3.id (setara A-. Kasnic) (equal to A-. Kasnic)	A3.id (setara A-. Kasnic) (equal to A-. Kasnic)	✓	-
Obligasi Subordinasi Bank Victoria I Tahun 2007 dengan tingkat suku bunga tetap Bank Victoria Subordinated Bond I of 2007 at fixed interest rate	200,000	10	12,50 (tahun ke-1 sampai ke-5) serta 21.50 (tahun ke-6 sampai ke-10) 12.50 (1st year to 5th year) and 21.50 (6th year to 10th year)	21 Maret 2007 - 21 Maret 2017 21 March 2007 - 21 March 2017	Baa2.id (setara BBB. Kasnic) (equal to BBB. Kasnic)	Baa2.id (setara BBB. Kasnic) (equal to BBB. Kasnic)	✓	-
Obligasi Bank Victoria III Tahun 2012 dengan tingkat suku bunga tetap Bank Victoria Bond III of 2012 at fixed interest rate	200,000	5	10.00	27 Juni 2012 - 27 Juni 2017 27 June 2012 - 27 June 2017	idBBB+ (*Triple* B Plus)	idBBB+ (*Triple* B Plus)	✓	-
Obligasi Subordinasi Bank Victoria II Tahun 2012 dengan tingkat suku bunga tetap Bank Victoria Subordinated Bond II of 2012 at fixed interest rate	300,000	7	11.00	27 Juni 2012 - 27 Juni 2019 27 June 2012 - 27 June 2019	idBBB+ (*Triple* B Plus)	idBBB+ (*Triple* B Plus)	✓	-
Obligasi Bank Victoria IV Tahun 2013 dengan tingkat suku bunga tetap Bank Victoria Bond IV of 2013 at fixed interest rate	200,000	5	9.50	27 Juni 2013 - 27 Juni 2018 27 June 2013 - 27 June 2018	idA- (*Single* A *Minus*)	idA- (*Single* A *Minus*)	✓	-
Obligasi Subordinasi Bank Victoria III Tahun 2013 dengan tingkat suku bunga tetap Bank Victoria Subordinated Bond III of 2013 at fixed interest rate	300,000	7	10.50	27 Juni 2013 - 27 Juni 2020 27 June 2013 - 27 June 2020	idBBB+ (*Triple* B Plus)	idBBB+ (*Triple* B Plus)	✓	-

Uraian Description	Total (Juta Rupiah) Total (Million Rupiah)	Tenor (Tahun) Tenure (Year)	Tingkat Suku Bunga Interest Rates (%)	Tanggal Date	Peringkat Saat Diterbitkan Ratings at Issuance	Peringkat Terakhir Latest Ratings	Status Pembayaran Payment Status	
							Lunas Paid	Belum Lunas Not Paid
Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 dengan tingkat suku bunga tetap Bank Victoria Continuous Bond I Phase I of 2017 at fixed interest rate	300,000	5	10.30	11 Juli 2017 - 11 Juli 2022 11 July 2017 - 11 July 2022	idA- (*Single* A *Minus*)	idA- (*Single* A *Minus*)	✓	-
Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 dengan tingkat suku bunga tetap Bank Victoria Continuous Subordinated Bond I Phase I of 2017 at fixed interest rate	50,000	7	11.00	11 Juli 2017 - 11 Juli 2024 11 July 2017 - 11 July 2024	idBBB (*Triple* B)	idBBB (*Triple* B)	✓	-
Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dengan tingkat suku bunga tetap Seri A Bank Victoria Series A Continuous Bond I Phase II of 2018 at fixed interest rate	100,000	3	9.70	5 Juni 2018 - 5 Juni 2021 5 June 2018 - 5 June 2021	idA- (*Single* A *Minus*)	idA- (*Single* A *Minus*)	✓	-
Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dengan tingkat suku bunga tetap Seri B Bank Victoria Series B Continuous Bond I Phase II of 2018 at fixed interest rate	200,000	5	10.30	5 Juni 2018 - 5 Juni 2023 5 June 2018 - 5 June 2023	idA- (*Single* A *Minus*)	idA- (*Single* A *Minus*)	✓	-
Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dengan tingkat suku bunga tetap Bank Victoria Continuous Subordinated Bond I Phase II of 2018 at fixed interest rate	350,000	7	11.00	5 Juni 2018 - 5 Juni 2025 5 June 2018 - 5 June 2025	idBBB (*Triple* B)	idBBB (*Triple* B)	-	✓
Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 Bank Victoria Continuing Bonds II Phase I Year 2019	100,000	2	9.75	28 Juni 2019 - 28 Juni 2021 28 June 2019 - 28 June 2021	idA- (*Single* A *Minus*)	idA- (*Single* A *Minus*)	✓	-
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 Bank Victoria Continuing Subordination Bonds II Phase I Year 2019	250,000	7	11.75	28 Juni 2019 - 28 Juni 2026 28 June 2019 - 28 June 2026	idBBB (*Triple* B)	idBBB (*Triple* B)	-	✓

Uraian Description	Total (Juta Rupiah) Total (Million Rupiah)	Tenor (Tahun) Tenure (Year)	Tingkat Suku Bunga Interest Rates (%)	Tanggal Date	Peringkat Saat Diterbitkan Ratings at Issuance	Peringkat Terakhir Latest Ratings	Status Pembayaran Payment Status	
							Lunas Paid	Belum Lunas Not Paid
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019 Bank Victoria Continuing Subordination Bonds II Phase II Year 2019	150,000	7	11.25	8 November 2019 – 8 November 2026	idBBB (*Triple* B)	idBBB (*Triple* B)	-	✓
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020 Bank Victoria Continuing Subordination Bonds II Phase III Year 2020	60,000	7	11.25	1 April 2020 - 1 April 2027	idBBB (*Triple* B)	idBBB (*Triple* B)	-	✓
Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 dengan tingkat bunga tetap Seri A Bank Victoria Series A Continuing Bonds III Phase I Year 2023 at fixed interest rate	300,000	3	9.25	9 Maret 2023 - 9 Maret 2026 9 March 2023 - 9 March 2026	idA- (*Single* A *Minus*)	idA- (*Single* A *Minus*)	-	✓
Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 dengan tingkat bunga tetap Seri B Bank Victoria Series B Continuing Bonds III Phase I Year 2023 at fixed interest rate	200,000	5	10.25	9 Maret 2023 - 9 Maret 2028 9 March 2023 - 9 March 2028	idA- (*Single* A *Minus*)	idA- (*Single* A *Minus*)	-	✓
Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap I Tahun 2024 Bank Victoria Continuous Subordinated Bonds III Phase I Year 2024	500,000	5	10.75	12 Juli 2024 - 12 Juli 2029 12 July 2024 - 12 July 2029	idBBB (*Triple* B)	idBBB (*Triple* B)	-	✓
Obligasi Berkelanjutan III Bank Victoria Tahap II Tahun 2024 Bank Victoria Continuing Bonds III Phase II Year 2024	500,000	3	9.50	12 Juli 2024 - 12 Juli 2027 12 July 2024 - 12 July 2027	idA- (*Single* A *Minus*)	idA- (*Single* A *Minus*)	-	✓

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

Struktur Grup
Group Structure



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

Kantor Akuntan Publik Public Accounting Firm	**Kantor Akuntan Publik Purwanto, Sungkoro & Surja (*Member of Ernst & Young*)** Purwanto, Sungkoro & Surja Public Accounting Firm (Member of Ernst & Young)		
Alamat Address	**Jasa yang Diberikan** Services Provided		
Indonesia Stock Exchange Building Tower 2 Lantai 7 / 7th Floor Jl. Jenderal Sudirman Kav. 52-53 Jakarta 12190 T : (021) 5289 5000 F : (021) 5289 4100	Audit Laporan Keuangan tahun buku 2024 (tanpa jasa non-audit). Audit of Financial Statements for 2024 fiscal year (without non-audit services).		
	Nama Akuntan Publik Name of Public Accountant	**Periode Penugasan** Assignment Period	**Biaya Jasa** Services Fee
	Yovita	2024	Rp1.720.000.000

Lembaga dan Profesi Penunjang Pasar Modal

Capital Market Supporting Institutions and Professionals

Uraian Description	Nama Name	Alamat Address	Jasa yang Diberikan Services Provided	Biaya Jasa Services Fee (Rp)
Biro Administrasi Efek Share Registrar Bureau	**PT Adimitra Jasa Korpora**	Rukan Kirana Boutiqe Office Jl. Kirana Avenue III Blok F3 No. 5 Kelapa Gading Jakarta Utara / North Jakarta 14250 T : (021) 2974 5222 F : (021) 2928 9961 E : opr@adimitra-jk.co.id W : www.adimitrajk.co.id	Jasa Administrasi Daftar Pemegang Saham dan Administrasi Waran No. AF088/BVIC/032023 dan No. PW-145/BVIC/092022 Shareholder Registration and Warrant Administration Services No. AF088/BVIC/032023 and No. PW-145/BVIC/092022	Rp46,000,000
Pencatatan Efek Securities Listing	**Bursa Efek Indonesia** **Indonesia Stock Exchange**	Indonesia Stock Exchange Building Tower I Jl. Jenderal Sudirman Kav. 52-53 Jakarta Selatan / South Jakarta 12190 T : (021) 5150 515 F : (021) 5150 330 W : www.idx.co.id	Pencatatan Tahunan Saham dan/atau Efek Bersifat Utang dan Sukuk. Annual Listing of Shares and/or Debt Securities and Sukuk.	Rp509,500,000
Notaris Notary	**Fathiah Helmi, SH**	Graha Irama Lantai 6C Jl. HR Rasuna Said Kav. 1–2 Jakarta 12950 T : (021) 5290 7304 (021) 5290 7305 (021) 5290 7306 F : (021) 5261 136 E : fhchozie@gmail.com	Pembuatan Akta Berita Acara dan Akta Pernyataan Keputusan RUPS Tahunan. Preparation of Deed of Minutes and Deed of Statement of Annual GMS Resolutions.	Rp40,800,000
Perusahaan Pemeringkat Efek Securities Rating Agency	**PT Pemeringkat Efek Indonesia**	Equity Tower Lantai 30 Sudirman Central Business District Lot. 9 Jl. Jenderal Sudirman Kav. 52-53 Jakarta 12190 T : (021) 5096 8469 F : (021) 5096 8468 W : www.pefindo.com	• Pemeringkatan Atas Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap I Tahun 2024; • Pemeringkatan Atas Obligasi Berkelanjutan III Bank Victoria Tahap II Tahun 2024; dan • Pemeringkatan Tahunan Perusahaan, Obligasi, dan Obligasi Subordinasi Bank Victoria. • Rating of Bank Victoria's Continuous Subordinated Bonds III Phase I Year 2024; • Rating of Bank Victoria's Continuing Bonds III Phase II Year 2024; and • Bank Victoria's Annual Rating of the Company, Bonds, and Subordinated Bond.	Rp665,000,000
Wali Amanat Trustee	**PT Bank Mega Tbk**	Menara Bank Mega Jl. Kapten Tendean No. 12–12A Jakarta 12970 T : (021) 7917 5000 F : (021) 7918 7100 W : www.bankmega.com	Jasa Tahunan Wali Amanat Atas Obligasi dan Obligasi Subordinasi Bank. Annual Trustee Service on the Bank's Bonds and Subordinated Bonds.	Rp442,500,000



Analisis dan Pembahasan Manajemen

Management Discussion and Analysis



Tinjauan Ekonomi dan Industri
Economic and Industrial Overview

Perekonomian Global dan Nasional

Dinamika geopolitik dunia yang cepat berubah, disertai dengan tingkat ketidakpastian yang tinggi, telah memengaruhi perkembangan ekonomi global sepanjang tahun 2024. Pertumbuhan ekonomi global tercatat melambat menjadi 3,2% pada tahun 2024, dari sebelumnya 3,3% pada tahun 2023. Perlambatan ini dipengaruhi oleh ketegangan geopolitik yang melibatkan negara-negara besar, yang menyebabkan volatilitas harga komoditas global dan gangguan rantai pasok, sehingga berdampak pada neraca perdagangan internasional dan arus investasi global. Ketidakpastian kebijakan ekonomi, termasuk akibat pergantian kepemimpinan di sejumlah negara utama, turut memengaruhi sentimen pasar dan keputusan investasi jangka panjang di berbagai sektor.

Perlambatan ekonomi global turut memengaruhi kebijakan moneter bank-bank sentral dan dinamika pasar keuangan dunia. Inflasi global tercatat menurun dari 6,2% pada 2023 menjadi 5,2% pada 2024, namun diperkirakan masih berada pada tingkat yang relatif tinggi dalam beberapa tahun ke depan, yaitu sebesar 4,5% pada 2025 dan 4,2% pada 2026. Risiko perang dagang antara Amerika Serikat dan sejumlah mitra dagangnya, potensi gangguan rantai pasok global, masih menjadi faktor utama yang membayangi prospek perekonomian dunia.

Memasuki triwulan III 2024, dengan meredanya ketegangan politik dan arah inflasi yang mulai melandai, sejumlah bank sentral mulai melonggarkan kebijakan moneternya. Bank Sentral Amerika Serikat (The Fed) menjadi salah satu yang mengambil langkah tersebut dengan mulai menurunkan *Federal Funds Rate* (FFR) pada September 2024. Pelonggaran kebijakan ini memberikan sentimen positif di pasar keuangan global.

Sementara itu, proses pemulihan ekonomi Indonesia terus berlanjut dengan pertumbuhan ekonomi tercatat sebesar 5,02% (*year-on-year*) pada tahun 2024. Meskipun sedikit lebih rendah dibandingkan pertumbuhan tahun sebelumnya yang mencapai 5,04%, capaian tersebut tetap menunjukkan resiliensi perekonomian nasional. Pertumbuhan ini terutama ditopang oleh kenaikan investasi, terjaganya konsumsi rumah tangga, serta peningkatan belanja pemerintah.

Dari sisi lapangan usaha, seluruh sektor menunjukkan pertumbuhan, dengan kontribusi tertinggi berasal dari jasa lainnya sebesar 9,80%, diikuti oleh sektor transportasi dan pergudangan sebesar 8,69% serta penyediaan akomodasi dan makan minum sebesar 8,56%. Sementara dari sisi pengeluaran,

Global and National Economy

The rapidly changing global geopolitical dynamics, accompanied by high levels of uncertainty, affected global economic developments throughout 2024. Global economic growth slowed to 3.2% in 2024, from 3.3% in 2023. This slowdown was influenced by geopolitical tensions involving major countries, which caused volatility in global commodity prices and disruptions to supply chains, thus impacting the international trade balance and global investment flows. Uncertainty about economic policies, including due to changes in leadership in a number of major countries, also affected market sentiment and long-term investment decisions in various sectors.

The slowdown in global economic also affected the monetary policies of central banks and the dynamics of global financial markets. Global inflation decreased from 6.2% in 2023 to 5.2% in 2024, but was estimated to remain at a relatively high level in the next few years, namely 4.5% in 2025 and 4.2% in 2026. The trade war risk between United States and a number of its trading partners, the disruption potential for global supply chain, is still the main factor overshadowing the prospects for the world economy.

Entering quarter III of 2024, with the easing of political tensions and the inflation direction that began to flatten, a number of central banks began to relax their monetary policies. The United States Central Bank (The Fed) is one of those who took this step by starting to lower the Federal Funds Rate (FFR) in September 2024. This policy loosening provided positive sentiment in the global financial market.

Meanwhile, Indonesia's economic recovery process continued with economic growth recorded at 5.02% (year-on-year) in 2024. Though slightly lower than the previous year's growth of 5.04%, this achievement still showed the national economy's resilience. This growth was primarily supported by increased investment, maintained household consumption, and increased government spending.

From business field side, all sectors showed growth, with the highest contribution from other services at 9.80%, followed by transportation and warehousing sector at 8.69%, and the provision of accommodation and food and beverages at 8.56%. Meanwhile, on expenditure side, the highest growth was achieved



pertumbuhan tertinggi dicapai oleh konsumsi lembaga nonprofit yang melayani rumah tangga sebesar 12,48%, disusul oleh pengeluaran konsumsi pemerintah sebesar 6,61%, dan ekspor barang dan jasa sebesar 6,51%.

Sumber:
- Bank Indonesia, "Laporan Perekonomian Indonesia 2024"; dan
- Badan Pusat Statistik, "Pertumbuhan Ekonomi Indonesia Triwulan IV-2024 BRS No. 17/02/Th. XXVIII, 5 Februari 2025".

by consumption of non-profit institutions serving households at 12.48%, followed by consumption expenditure of government at 6.61%, and exports of goods and services at 6.51%.

Source:
- Bank Indonesia, "Indonesia Economic Report 2024"; and
- Statistics Indonesia, "Indonesia's Economic Growth Quarter IV-2024 BRS No. 17/02/Th. XXVIII, 5 February 2025".

Tinjauan Pasar Keuangan dan Industri Perbankan

Menutup tahun 2024, sektor perbankan Indonesia kembali menunjukkan daya tahan (*resilience*) di tengah ketidakpastian global dan tantangan ekonomi domestik. Melalui strategi yang inovatif dan responsif, industri perbankan berhasil menjaga stabilitas sistem keuangan, mendukung aktivitas perekonomian, serta memperkuat kepercayaan para pemangku kepentingan sebagai salah satu pilar utama dalam proses pemulihan dan pertumbuhan ekonomi nasional.

Sepanjang tahun 2024, kinerja intermediasi perbankan tetap solid, tecermin dari pertumbuhan kredit bank umum yang mencapai 10,39%, dari Rp7.090,24 triliun pada tahun sebelumnya menjadi Rp7.827,15 triliun. Berdasarkan kelompok penggunaannya, kredit modal kerja tumbuh 8,35% (yoy), kredit konsumsi sebesar 10,61% (yoy), dan kredit investasi sebesar 13,62% (yoy). Di sisi lain, pembiayaan syariah juga mengalami pertumbuhan sebesar 9,87% (yoy), sementara penyaluran kredit kepada sektor UMKM tercatat tumbuh sebesar 3,37% (yoy). Kualitas kredit tetap terjaga baik, yang tercermin dari rasio NPL bruto sebesar 2,08% dan NPL neto sebesar 0,74%.

Overview of Financial Market and Banking Industry

Closing 2024, the Indonesian banking sector again demonstrated its resilience amid global uncertainty and domestic economic challenges. Through innovative and responsive strategies, banking industry managed in maintaining financial system stability, supporting economic activity, and strengthening stakeholders confidence as one main pillar in the process of national economic recovery and growth.

Throughout 2024, banking intermediation performance remained solid, reflected in the growth of commercial bank loans which reached 10.39%, from Rp7,090.24 trillion in the previous year to Rp7,827.15 trillion. Based on its usage group, working capital loans grew by 8.35% (yoy), consumer credit by 10.61% (yoy), and investment loans by 13.62% (yoy). On the other hand, sharia financing also grew by 9.87% (yoy), while lending to the MSME sector grew by 3.37% (yoy). Credit quality was properly maintained, as reflected in the gross NPL ratio of 2.08% and net NPL of 0.74%.

Dari sisi penghimpunan dana, dana pihak ketiga tumbuh sebesar 4,48%, dari Rp8.457,93 triliun menjadi Rp8.837,24 triliun. Pertumbuhan tersebut didorong oleh peningkatan pada giro sebesar 3,34% (yoy), tabungan sebesar 6,78% (yoy), dan deposito sebesar 3,50% (yoy). Pertumbuhan dana pihak ketiga turut menopang likuiditas perbankan, yang tercermin dari rasio alat likuid terhadap *non-core deposit* (AL/NCD) sebesar 112,87% dan rasio alat likuid terhadap dana pihak ketiga (AL/DPK) sebesar 25,59%, jauh di atas *threshold* masing-masing sebesar 50% dan 10%. Ketahanan industri perbankan juga tetap kuat, dengan tingkat permodalan yang tercermin dari *capital adequacy ratio* (CAR) yang mencapai 26,68%.

Secara keseluruhan, kinerja industri perbankan nasional pada tahun 2024 menunjukkan hasil. Aset, dana pihak ketiga, dan kredit masing-masing mencatatkan pertumbuhan sebesar 5,91%, 4,48%, dan 10,39%. Sementara itu, Kelompok Bank berdasarkan Modal Inti (KBMI) 1 juga menunjukkan kinerja yang solid, dengan pertumbuhan aset sebesar 5,04%, dana pihak ketiga sebesar 6,15%, dan kredit sebesar 7,05% sepanjang tahun 2024. Capaian ini menegaskan bahwa industri perbankan tetap menjadi salah satu motor penggerak pemulihan dan pertumbuhan ekonomi Indonesia, sekaligus menunjukkan ketahanan sektor keuangan dalam menghadapi dinamika ekonomi global dan domestik.

Sumber:
- Bank Indonesia, "Laporan Perekonomian Indonesia 2024";
- Otoritas Jasa Keuangan, "Siaran Pers : Refleksi 2024: Perbankan Indonesia Tetap Solid dan Melangkah Optimis di Tengah Ketidakpastian Ekonomi Global, 31 Desember 2024";
- Otoritas Jasa Keuangan, "Statistik Perbankan Indonesia - Desember 2024"; serta
- Kementerian Keuangan Republik Indonesia, "Siaran Pers : Stabilitas Sistem Keuangan Tetap Terjaga di Tengah Divergensi Pertumbuhan Ekonomi Dunia dan Ketidakpastian Pasar Keuangan Global, 24 Januari 2025".

In terms of funding, third party funds grew by 4.48%, from Rp8,457.93 trillion to Rp8,837.24 trillion. This growth was driven by the increase in demand deposits of 3.34% (yoy), savings deposits of 6.78% (yoy), and time deposits of 3.50% (yoy). The growth in third party funds also supported banking liquidity, as reflected in the ratio of liquid assets to non-core deposits (AL/NCD) of 112.87% and the ratio of liquid assets to third party funds (AL/DPK) of 25.59%, far above the thresholds of 50% and 10%, respectively. Banking industry's resilience also remained strong, with a capital rating reflected in capital adequacy ratio (CAR) which reached 26.68%.

Overall, the performance of the national banking industry in 2024 showed some results. Assets, third-party funds, and loans, each recorded growth of 5.91%, 4.48%, and 10.39%, respectively. Meanwhile, the Bank Group based on Core Capital (KBMI) 1 also showed solid performance, with the growth of assets of 5.04%, third party funds of 6.15%, and loans of 7.05% throughout 2024. These achievements confirmed that banking industry was still one of the driving forces of Indonesia's economic recovery and growth, while also demonstrating the resilience of financial sector in facing global and domestic economic dynamics.

Source:
- Bank Indonesia, "Indonesia Economic Report 2024";
- Financial Services Authority, "Press Release: Reflection 2024: Indonesian Banking Remains Solid and Steps Optimistically Amidst Global Economic Uncertainty, 31 December 2024";
- Financial Services Authority, "Indonesian Banking Statistics - December 2024"; and
- Ministry of Finance of the Republic of Indonesia, "Press Release: Financial System Stability Remains Maintained Amidst Divergence in World Economic Growth and Global Financial Market Uncertainty, 24 January 2025".

Tinjauan Operasional
Operational Overview

Strategi Pengembangan Bisnis

Di tengah tantangan yang terus berkembang, seperti kondisi ekonomi global yang tidak pasti, transformasi teknologi yang berlangsung cepat, serta perubahan preferensi nasabah, Bank menyadari pentingnya memiliki strategi bisnis yang adaptif dan inovatif. Strategi ini diperlukan tidak hanya untuk mempertahankan posisi di pasar, tetapi juga untuk mendorong peningkatan profitabilitas secara berkelanjutan.

Sebagai respons terhadap tantangan tersebut, Bank berkomitmen untuk terus melakukan inovasi terhadap produk, jasa, dan layanan yang ditawarkan, serta mengembangkan saluran pemasaran

Business Development Strategy

Amidst the ever-growing challenges, such as uncertain global economic conditions, rapid technology transformation, and changes to customer preferences, the Bank realizes the importance of having an adaptive and innovative business strategy. This strategy is necessary not only to maintain its position in the market, but also to drive sustainable profitability.

In response to such challenges, the Bank is committed to continuing to innovate its products and services offered, as well as developing marketing channels and other supporting infrastructure.

dan infrastruktur pendukung lainnya. Tujuannya adalah untuk menciptakan pengalaman perbankan yang relevan, efisien, dan memuaskan bagi nasabah, sejalan dengan kebutuhan zaman dan dinamika industri keuangan.

Sebagai wujud nyata dari komitmen tersebut, Bank telah menyusun rencana strategis Bank, yang di dalamnya memuat arah kebijakan serta strategi pengembangan bisnis yang dijalankan oleh Bank Victoria pada tahun 2024 sebagai berikut:

1. **Strategi Perkreditan**

   Strategi di bidang perkreditan diarahkan untuk menjaga dan meningkatkan kualitas kredit, termasuk mendorong penyaluran kredit yang ramah lingkungan guna mencapai pertumbuhan yang sehat dan berkelanjutan dengan tetap mengedepankan prinsip kehati–hatian (*prudential financing*). Adapun beberapa strategi yang dijalankan mencakup:

   a. Memproyeksikan pertumbuhan total kredit secara selektif dan konservatif pada kisaran 9-11%;
   b. Meningkatkan penyaluran kredit melalui model bisnis *channeling* dengan menjalin kerja sama bersama *fintech*, Bank Perkreditan Rakyat, perusahaan *multifinance*, dan koperasi, guna memperluas portofolio kredit, meningkatkan potensi pendapatan berbasis komisi (*fee based income),* serta memperluas jangkauan pasar;
   c. Mengembangkan ekosistem *digital lending* untuk mempercepat proses penyampaian informasi dan pengajuan kredit kepada debitur;
   d. Menjaga dan meningkatkan kualitas kredit melalui pemantauan debitur secara berkala, pelaksanaan sistem peringatan dini (*early warning system),* serta penguatan kapasitas sumber daya manusia dan sistem pendukung;
   e. Mempercepat penyelesaian kredit yang dihapus buku dan mempercepat penjualan agunan yang diambil alih, antara lain termasuk melalui pemanfaatan *platform* digital Bank; dan
   f. Mengoptimalkan program pelatihan yang berkesinambungan untuk meningkatkan kompetensi tenaga penjualan di bidang perkreditan.

2. **Strategi Pendanaan dan Pengembangan Layanan**

   Strategi dalam bidang pendanaan difokuskan pada upaya menjaga loyalitas nasabah, meningkatkan basis nasabah baru, serta memperkuat struktur pendanaan yang sehat dan optimal. Seluruh langkah strategis diarahkan untuk mencapai pertumbuhan yang berkelanjutan dan berbasis pada pengendalian biaya dana *(cost of fund).* Adapun strategi yang dijalankan Bank Victoria sepanjang tahun 2024 adalah sebagai berikut:

   a. Menargetkan pertumbuhan secara tahunan *(year-on-year)* pada kisaran 8–10%, dengan fokus utama pada efisiensi *cost of fund*;
   b. Merancang berbagai program akuisisi nasabah baru, antara lain melalui penawaran *cashback* atau skema bunga yang menarik untuk meningkatkan daya tarik produk pendanaan;

The objective is to create relevant, efficient, and satisfying banking experiences for customers, in line with the needs of the times and the dynamics of financial industry.

As a concrete manifestation of this commitment, the Bank has prepared a strategic plan for the Bank, which sets out the policy direction and business development strategy implemented by Bank Victoria in 2024 as follows:

1. **Loans Strategies**

   The strategy in loan sector is directed at maintaining and improving loan quality, including encouraging environmentally friendly lending to achieve sound and sustainable growth by still prioritizing prudential financing principles. Several strategies implemented include:

   a. Projecting total loan growth selectively and conservatively in the range of 9-11%;
   b. Increasing lending through a channeling business model by collaborating with fintech, Bank Perkreditan Rakyat, multifinance companies, and cooperatives, in order to expand the loan portfolios, increase the potential for fee-based income, and expand market reach;
   c. Developing a digital lending ecosystem to accelerate the process of delivering information and loan applications to debtors;
   d. Maintaining and improving loan quality through regular debtor monitoring, implementing early warning system, and strengthening human resource capacity and support systems;
   e. Accelerating the settlement of written-off loans and accelerating the sale of foreclosed assets, including through the use of the Bank's digital platform; and
   f. Optimizing continuous training programs to increase the competence of sales personnel in loan sector.

2. **Funding and Development Strategies**

   The strategy in funding sector is focused on efforts to maintain customer loyalty, increase new customer base, and strengthen a sound and optimal funding structure. All strategic steps are directed towards achieving sustainable growth and are based on controlling the cost of funds. The strategies implemented by Bank Victoria throughout 2024 were as follows:

   a. Targeting annual growth (year-on-year) in the range of 8–10%, with a primary focus on cost of funds efficiency;
   b. Designing various new customer acquisition programs, including through cashback offers or attractive interest scheme to increase the attractiveness of funding products;

c. Meningkatkan pendapatan berbasis komisi (*fee-based income*) melalui kerja sama dan peningkatan penjualan produk-produk seperti Obligasi Ritel, *Bancassurance*, dan reksadana;
d. Melakukan pengembangan berkelanjutan terhadap *platform digital* seperti *Internet Banking, Mobile Banking, Internet Banking Business*, dan *Mobile Banking Corporate* dengan penyempurnaan fitur dan produk digital yang kompetitif dan kebutuhan nasabah;
e. Meningkatkan kualitas layanan melalui pengembangan *digital operations*, termasuk implementasi layanan *video banking* yang memungkinkan transaksi non-tunai secara virtual namun tetap mengedepankan prinsip kehati-hatian dan keamanan;
f. Memperluas eksposur produk dan layanan Bank Victoria kepada publik melalui media sosial dan berbagai kegiatan promosi lainnya;
g. Mengembangkan layanan transaksi perbankan guna mendukung kebutuhan transaksi para pemangku kepentingan (*stakeholder*), sekaligus memperluas peluang bisnis;
h. Mendukung pelaksanaan keuangan berkelanjutan melalui program *corporate social responsibility* (CSR) yang berfokus pada bidang kesehatan, pendidikan, dan kemasyarakatan; dan
i. Meningkatkan sinergi bisnis dengan grup usaha, termasuk dalam pengembangan layanan berbasis syariah sebagai bagian dari strategi pertumbuhan berkelanjutan.

3. Strategi Bidang Operasional dan Teknologi Sistem Informasi

Dalam rangka mendukung operasional bisnis yang efisien dan berkelanjutan, Bank Victoria memprioritaskan pemanfaatan serta pengembangan teknologi informasi guna memperkuat kualitas layanan, efektivitas operasional, keamanan sistem, dan kepatuhan terhadap regulasi yang berlaku. Adapun strategi yang diterapkan dalam bidang operasional dan teknologi sistem informasi pada tahun 2024 meliputi:

a. Meningkatkan *service excellence* kepada nasabah guna memastikan kelancaran dan kecukupan operasional Bank;
b. Melanjutkan evaluasi kinerja jaringan kantor cabang termasuk dari aspek geografis, untuk mendorong penjualan, produktivitas, efisiensi, dan profitabilitas secara menyeluruh;
c. Melakukan *review* dan pengembangan terhadap kontrol pengamanan sistem teknologi informasi guna menjaga efektivitas sistem dan memastikan kepatuhan terhadap ketentuan regulator;
d. Menguatkan dan mengembangkan kapabilitas operasional guna meningkatkan kualitas interaksi dengan nasabah serta menunjang kelangsungan operasional dan rencana bisnis Bank;
e. Meningkatkan layanan dan produk perbankan berbasis *digital banking;*
f. Melanjutkan transformasi digital secara berkelanjutan untuk mendukung seluruh aktivitas bisnis dan layanan;

c. Increasing fee-based income through collaboration and increasing sales of products such as Retail Bonds, Bancassurance, and mutual funds;
d. Carrying out continuous development of digital platforms such as Internet Banking, Mobile Banking, Internet Banking Business, and Mobile Banking Corporate by improving competitive digital features and products and customer needs;
e. Improving service quality through the development of digital operations, including the implementation of video banking services that enable virtual non-cash transactions by still prioritizing the principles of prudence and security;
f. Expanding exposure of Bank Victoria products and services to the public through social media and various other promotional activities;
g. Developing banking transaction services to support the transaction needs of stakeholders, while expanding business opportunities;
h. Supporting the implementation of sustainable finance through corporate social responsibility (CSR) programs that focus on health, education, and society; and
i. Increasing business synergy with business groups, including in the development of sharia-based services as part of a sustainable growth strategy.

3. Operational and Information Systems Technology Strategies

To support efficient and sustainable business operations, Bank Victoria prioritizes the utilization and development of information technology to strengthen service quality, operational effectiveness, system security, and compliance with applicable regulations. The strategies implemented in the operational and information system technology fields in 2024 included:

a. Improving service excellence to customers to ensure the smooth and adequacy of the Bank's operations;
b. Continuing performance evaluation of the branch office network including from a geographical aspect, to encourage sales, productivity, efficiency, and profitability as a whole;
c. Reviewing and developing information technology system security controls to maintain system effectiveness and ensure compliance with regulatory requirements;
d. Strengthening and developing operational capabilities to improve the quality of interactions with customers and support the sustainability of the Bank's operations and business plans;
e. Improving banking services and products based on digital banking;
f. Continuing digital transformation in a sustainable manner to support all business activities and services;

g. Mengembangkan proyek berbasis *analytics* untuk memperkuat dukungan terhadap operasional, kepatuhan, relasi nasabah, monitoring layanan, serta mempercepat fungsi pengawasan manajemen (*management oversight*) di seluruh cabang dan unit usaha;
h. Melakukan relokasi *data center* untuk menunjang keberlangsungan operasional Bank, termasuk memastikan kelangsungan sistem dalam kondisi krisis atau bencana;
i. Melakukan peningkatan dan pembaruan aplikasi serta infrastruktur TI untuk mendukung kebutuhan bisnis yang dinamis;
j. Mengoptimalkan pengelolaan proyek dengan menerapkan *system development life cycle* (SDLC) menggunakan metode *agile/scrum* maupun *waterfall*, sesuai dengan karakteristik proyek; dan
k. Meningkatkan koordinasi dan komunikasi internal serta dengan pemangku kepentingan dalam pengembangan teknologi informasi untuk memastikan sinergi dan keselarasan strategi TI dengan arah bisnis Bank.

g. Developing analytics-based projects to strengthen the support for operations, compliance, customer relations, service monitoring, and accelerating management oversight functions across all branches and business units;
h. Relocating data centers to support the Bank's operational sustainability, including ensuring system sustainability in conditions of crisis or disaster;
i. Improving and updating IT applications and infrastructure to support dynamic business needs;
j. Optimizing project management by implementing a system development life cycle (SDLC) using agile/scrum or waterfall methods, according to project characteristics; and
k. Improving internal coordination and communication with stakeholders in information technology development to ensure synergy and alignment of IT strategy with the Bank's business direction.

Strategi Pemasaran

Aspek pemasaran merupakan elemen krusial dalam membangun dan memperkuat hubungan antara Bank dan nasabah, sekaligus menjadi sarana untuk memperluas pangsa pasar di tengah persaingan industri perbankan yang semakin kompetitif. Seiring dengan berkembangnya teknologi serta perubahan perilaku dan preferensi nasabah, Bank dituntut untuk merancang strategi pemasaran yang tidak hanya efektif, tetapi juga relevan dengan kebutuhan dan karakteristik pasar yang terus berubah. Pada tahun 2024, Bank Victoria menerapkan aktivitas pemasaran yang utamanya berfokus pada sejumlah strategi sebagai berikut:

1. Mewujudkan inovasi produk dan layanan, khususnya pada kanal digital serta pengembangannya, dengan dukungan sistem teknologi informasi guna menciptakan keunggulan kompetitif dan meningkatkan loyalitas nasabah. Langkah ini ditujukan untuk mendorong pertumbuhan pendapatan operasional, termasuk *fee based income*, serta memperluas pangsa pasar Bank;
2. Melanjutkan evaluasi atas kinerja jaringan kantor, termasuk mempertimbangkan relokasi ke wilayah yang memiliki potensi bisnis lebih menguntungkan, disertai pengenalan secara intensif terhadap produk dan layanan digital sebagai bentuk inovasi terkini yang ditawarkan Bank; dan
3. Mendorong optimalisasi peran jaringan kantor dalam pelaksanaan program literasi keuangan, inklusi keuangan, dan inisiatif keberlanjutan (*sustainability*), sebagai bagian dari upaya memperluas akses layanan perbankan dan mendukung agenda pembangunan yang berkelanjutan.

Marketing Strategy

Marketing aspect is a crucial element in establishing and strengthening relationship between the Bank and customers, as well as becoming a means to expand market share amidst the increasingly competitive banking industry. Along with the technology development and changes to customer behavior and preferences, the Bank is required to design a marketing strategy that is not only effective, but also relevant to the needs and characteristics of the ever-changing market. In 2024, Bank Victoria implemented marketing activities primarily focusing on a number of strategies as follows:

1. Realizing product and service innovation, particularly in digital channels and their development, with the support of information technology systems to create competitive advantages and increase customer loyalty. This step is intended to encourage growth in operational income, including fee-based income, and expand the Bank's market share;
2. Continuing the evaluation of office network performance, including considering relocation to areas with more profitable business potential, accompanied by intensive introduction of digital products and services as a form of the latest innovation offered by the Bank; and
3. Encouraging role optimization of office network in implementing financial literacy programs, financial inclusion, and sustainability initiatives, as part of efforts to expand access to banking services and support the sustainable development agenda.

Pangsa Pasar

Bank Victoria melakukan pemetaan terhadap pangsa pasar Bank secara periodik, yaitu melalui perbandingan terhadap Perbankan Nasional (BUK) dan Kelompok Bank dengan Modal Inti (KBMI) 1, dengan pangsa pasar Bank pada periode 2023-2024 dapat dilihat pada tabel berikut:

Market Share

Bank Victoria periodically carries out mapping on the Bank's market share, that is through comparisons with National Banking (BUK) and Bank Group with Core Capital (KBMI) 1, with the Bank's market share in the period 2023-2024 presented in the following table:

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

Uraian	2024			2023			Description
	Aset Assets	Kredit Loans	Dana Pihak Ketiga Third-Party Funds	Aset Assets	Kredit Loans	Dana Pihak Ketiga Third-Party Funds	
Perbankan Nasional (BUK)	**12,460,955**	**7,827,148**	**8,837,242**	11,765,838	7,090,243	8,457,929	National Banking (BUK)
KBMI 1	**1,447,345**	**804,546**	**974,815**	1,377,864	751,536	918,307	KBMI 1
Bank Victoria	**31,046**	**20,560**	**23,332**	29,624	18,629	22,429	Bank Victoria
Pangsa Pasar Terhadap BUK (%)	**0.25**	**0.26**	**0.26**	0.25	0.26	0.27	Market Share to BUK (%)
Pangsa Pasar Terhadap KBMI 1 (%)	**2.15**	**2.56**	**2.39**	2.15	2.48	2.44	Market Share of KBMI 1 (%)

Pangsa Pasar Bank Victoria Terhadap Industri Perbankan

Berdasarkan total aset, penguasaan pasar Bank Victoria terhadap Industri perbankan nasional pada tahun 2024 tercatat sebesar 0,25%, sama seperti capaian pada tahun sebelumnya. Dari sisi dana pihak ketiga, pangsa pasar Bank Victoria pada tahun 2024 sebesar 0,26%, mengalami sedikit penurunan dibandingkan tahun 2023 yang sebesar 0,27%. Sementara itu, dari sisi penyaluran kredit, pangsa pasar Bank Victoria terhadap industri perbankan pada tahun 2024 tetap berada di level 0,26%, tidak mengalami perubahan dibandingkan tahun sebelumnya.

Bank Victoria's Market Share in Banking Industry

Based on the total assets, Bank Victoria's market share in national banking industry in 2024 was recorded at 0.25%, the same as the achievement in the previous year. In terms of third party funds, Bank Victoria's market share in 2024 was 0.26%, a slight decrease compared to 0.27% in 2023. Meanwhile, from lending side, Bank Victoria's market share on banking industry in 2024 remained at 0.26%, unchanged from that of the previous year.

Pangsa Pasar Bank Victoria Terhadap KBMI 1

Pada kelompok Bank berdasarkan Modal Inti KBMI 1, pangsa pasar Bank Victoria dari sisi total aset tercatat sebesar 2,15% pada tahun 2024, sama seperti pada tahun 2023. Dari sisi dana pihak ketiga, pangsa pasar Bank Victoria pada tahun 2024 mencapai 2,39%, sedikit menurun dari 2,44% pada tahun sebelumnya. Sementara itu, pangsa pasar kredit yang disalurkan Bank Victoria terhadap KBMI 1 mengalami peningkatan dari 2,48% pada tahun 2023 menjadi 2,56% pada tahun 2024.

Bank Victoria's Market Share of KBMI 1

In the Bank group based on KBMI 1 Core Capital, Bank Victoria's market share in terms of total assets was recorded at 2.15% in 2024, the same as that of 2023. In terms of third party funds, Bank Victoria's market share in 2024 reached 2.39%, slightly down from 2.44% in the previous year. Meanwhile, the market share of lending by Bank Victoria to KBMI 1 increased from 2.48% in 2023 to 2.56% in 2024.

Suku Bunga Dasar Bank

Sebagai salah satu bank umum, Bank Victoria memiliki kewajiban untuk melaporkan dan mempublikasikan Suku Bunga Dasar Kredit (SBDK) dalam mata uang Rupiah sesuai dengan ketentuan yang diatur dalam Peraturan Otoritas Jasa Keuangan No. 37/POJK.03/2019 tentang Transparansi dan Publikasi Laporan Bank. SBDK berfungsi sebagai pedoman awal dalam penetapan suku bunga kredit yang akan dikenakan kepada nasabah.

Prime Lending Rate

As a commercial bank, Bank Victoria is required to report and publish the Prime Lending Rate (SBDK) in Rupiah in accordance with the provisions of Financial Services Authority Regulation No. 37/POJK.03/2019 on Transparency and Publication of Bank Reports. SBDK serves as an initial guideline for determining the lending rate that will be charged to customers.

Perlu diketahui bahwa nilai SBDK belum mencakup komponen estimasi premi risiko, yang besarnya sangat tergantung pada hasil penilaian Bank terhadap profil risiko masing-masing debitur atau kelompok debitur. Oleh karena itu, suku bunga kredit yang dikenakan kepada nasabah dapat lebih tinggi dari SBDK, tergantung pada risiko kredit dan kebijakan internal Bank.

Bank Victoria melakukan penyesuaian suku bunga secara bertahap dan berhati-hati, dengan mempertimbangkan berbagai faktor eksternal seperti kondisi makroekonomi, ketersediaan likuiditas, serta arah pergerakan suku bunga acuan BI 7-*day (Reverse) Repo Rate*. Penyesuaian ini bertujuan untuk menjaga keseimbangan antara daya saing kredit yang ditawarkan dengan pengelolaan risiko dan keberlanjutan usaha Bank. Adapun rincian tingkat SBDK Bank Victoria disajikan dalam tabel berikut:

It should be noted that SBDK value does not include the risk premium estimation component, the amount of which highly depends on the Bank's assessment of the risk profile of each debtor or group of debtors. Therefore, the prime lending rate charged to customers may be higher than SBDK, depending on the credit risk and the Bank's internal policies.

Bank Victoria gradually and carefully adjusts the interest rate, by considering various external factors such as macroeconomic conditions, liquidity availability, and the direction of benchmark interest rate BI 7-day (Reverse) Repo Rate. This adjustment aims at maintaining a balance between the competitiveness of loans offered and risk management as well as business sustainability of the Bank. The details of Bank Victoria's SBDK are presented in the following table:

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

(dalam % / in %)

Uraian	2024	2023	Description
Giro			**Demand Deposits**
Rupiah	**0.67**	0.86	Rupiah
Dolar Amerika Serikat	**0.82**	0.48	United States Dollar
Tabungan			**Savings Deposits**
Rupiah	**0.9**	1.06	Rupiah
Dolar Amerika Serikat	**N/A**	N/A	United States Dollar
Deposito Berjangka			**Time Deposits**
Rupiah	**6.20**	5.20	Rupiah
Dolar Amerika Serikat	**4.20**	2.97	United States Dollar

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

(dalam % / in %)

Komponen[1]	Kredit Korporasi[2] Corporate Loans[2]	Kredit Ritel[2] Retail Credit[2]	Kredit Mikro[3] Micro Credit[3]	Kredit Konsumsi[2] Consumer Credit[2]		Component[1]
				KPR House Loan	Non-KPR[4] Non-House Loan[4]	
Harga Pokok Dana untuk Kredit (HPDK) / Cost of Funds for Loans (HPDK)						
Biaya Dana	6.60	6.60	6.60	6.60	6.60	Cost of Funds
Biaya Dana Pihak Ketiga	5.53	5.53	5.53	5.53	5.53	Cost of Third-Party Funds
Biaya Dana Bukan Pihak Ketiga	1.07	1.07	1.07	1.07	1.07	Cost of Non-Third-Party Funds
Biaya Dana Liabilitas kepada Bank Lain	0.28	0.28	0.28	0.28	0.28	Cost of Liability Funds to Other Banks
Biaya Dana Liabilitas kepada Bank Indonesia	0.00	0.00	0.00	0.00	0.00	Cost of Liability Funds to Bank Indonesia
Biaya Dana Surat Berharga	0.79	0.79	0.79	0.79	0.79	Cost of Securities Funds
Biaya Dana Pinjaman yang Diterima	0.00	0.00	0.00	0.00	0.00	Cost of Borrowing Funds
Biaya Dana Liabilitas Antar Kantor	0.00	0.00	0.00	0.00	0.00	Cost of Inter-Office Liability Funds
Biaya Dana Liabilitas Keuangan Permodalan	0.00	0.00	0.00	0.00	0.00	Cost of Capital Finance Liability Funds

Komponen[1]	Kredit Korporasi[2] Corporate Loans[2]	Kredit Ritel[2] Retail Credit[2]	Kredit Mikro[3] Micro Credit[3]	Kredit Konsumsi[2] Consumer Credit[2]		Component[1]
				KPR House Loan	Non-KPR[4] Non-House Loan[4]	
Biaya Dana Lainnya	0.00	0.00	0.00	0.00	0.00	Cost of Other Funds
Biaya Promosi dan Pemasaran Terkait Pendanaan	0.00	0.00	0.00	0.00	0.00	Cost of Promotion and Marketing related to Funding
Lainnya	0.00	0.00	0.00	0.00	0.00	Others
Biaya Jasa	0.00	0.00	0.00	0.00	0.00	Cost of Services
Biaya Regulasi	0.00	0.00	0.00	0.00	0.00	Cost of Regulations
Biaya GWM	0.00	0.00	0.00	0.00	0.00	Cost of Statutory Reserve Requirement
Biaya Premi Penjaminan Lembaga Penjamin Simpanan	0.00	0.00	0.00	0.00	0.00	Cost of Deposit Insurance Corporation Guarantee Premium
HPDK Lainnya	0.00	0.00	0.00	0.00	0.00	Other HPDK
Biaya Kas	0.00	0.00	0.00	0.00	0.00	Cost of Cash
Lainnya	0.00	0.00	0.00	0.00	0.00	Others
Biaya *Overhead* / Overhead Cost						
Biaya Tenaga Kerja	0.74	0.74	0.74	0.74	0.74	Labor Cost
Biaya Pendidikan dan Pelatihan	0.00	0.00	0.00	0.00	0.00	Education and Training Cost
Biaya Penelitian dan Pengembangan	0.00	0.00	0.00	0.00	0.00	Research and Development Cost
Biaya Sewa	0.00	0.00	0.00	0.00	0.00	Rent Cost
Biaya Promosi dan Pemasaran	0.06	0.06	0.06	0.06	0.06	Promotion and Marketing Cost
Cash Back	0.00	0.00	0.00	0.00	0.00	Cash Back
Hadiah	0.00	0.00	0.00	0.00	0.00	Gifts
Iklan dan Promosi	0.06	0.06	0.06	0.06	0.06	Advertising and Promotion
Sponsorship/ Entertainment	0.00	0.00	0.00	0.00	0.00	Sponsorship/ Entertainment
Lainnya	0.00	0.00	0.00	0.00	0.00	Others
Biaya Pemeliharaan dan Perbaikan	0.00	0.00	0.00	0.00	0.00	Repairs and Maintenance Cost
Biaya Penyusutan Aset Tetap dan Inventaris	0.00	0.00	0.00	0.00	0.00	Depreciation of Fixed Asset and Inventory Cost
Biaya *Overhead* Lainnya	1.56	1.56	1.56	1.56	1.56	Other Overhead Cost
Biaya Barang/Jasa dan Administrasi	0.00	0.00	0.00	0.00	0.00	Goods/Services and Administration Cost
Lainnya	1.56	1.56	1.56	1.56	1.56	Others
Margin Keuntungan	**1.00**	**1.50**	**2.50**	**1.00**	**2.50**	**Profit Margin**
Suku Bunga Dasar Kredit (SBDK)	**9.96**	**10.46**	**11.46**	**9.96**	**11.46**	**Prime Lending Rate (SBDK)**
Estimasi Premi Risiko	**1.02**	**1.02**	**1.02**	**1.02**	**1.02**	**Risk Premium Estimation**
Suku Bunga Kredit (SBDK + Estimasi Premi Risiko)	**10.98**	**11.48**	**12.48**	**10.98**	**12.48**	**Loan Interest Rate (SBDK + Risk Premium Estimation)**

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

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

(dalam % / in %)

Uraian	2024	2023	Description
Rupiah	**10.27**	9.85	Rupiah
Dolar Amerika Serikat	**5.39**	8.85	United States Dollar

Tinjauan Segmen Usaha

Penjelasan dan Kinerja Operasional Segmen Operasi

Dalam menjalankan kegiatan usaha, Bank Victoria memiliki 1 (satu) segmen usaha utama, yaitu segmen konvesional, yang mencakup produk pinjaman, penghimpunan dana pihak ketiga, serta berbagai jasa perbankan lainnya. Seluruh kegiatan usaha Bank difokuskan pada segmen ini sebagai bagian dari strategi bisnis yang berorientasi pada pertumbuhan berkelanjutan dan peningkatan pelayanan kepada nasabah.

Adapun penjelasan mengenai kinerja segmen konvensional Bank Victoria sepanjang tahun 2024 diuraikan sebagai berikut:

1. **Penghimpunan Dana (Simpanan)**
   Bank menjalankan kegiatan penghimpunan dana dari masyarakat melalui 3 (tiga) jenis produk utama, yaitu tabungan, giro, dan deposito berjangka. Masing-masing produk memiliki karakteristik dan keunggulan tersendiri yang dirancang untuk menjawab kebutuhan nasabah dengan berbagai profil.

   Tabungan memberikan kemudahan akses dan fleksibilitas dalam transaksi harian, giro ditujukan bagi nasabah individu maupun korporasi yang memerlukan fasilitas pembayaran lebih dinamis, sedangkan deposito berjangka menawarkan imbal hasil lebih tinggi dengan jangka waktu tertentu.

   Kinerja ketiga jenis produk simpanan tersebut selama 2 (dua) tahun terakhir tercermin dalam pertumbuhan dana pihak ketiga Bank dan diuraikan lebih lanjut dalam tabel berikut:

Business Segment Overview

Explanation and Operational Performance of Operating Segment

In carrying out its business activities, Bank Victoria has 1 (one) main business segment, namely the conventional segment, which includes loan products, third-party funding, and various other banking services. All of the Bank's business activities are focused on this segment as part of business strategies oriented towards sustainable growth and improved customer service.

The explanation regarding the conventional segment performance of Bank Victoria throughout 2024 is outlined as follows:

1. **Funding (Savings)**
   The Bank carries out funding activities from the community through 3 (three) main types of products, namely savings deposits, demand deposits, and time deposits. Each product has its own characteristics and advantages designed to meet the needs of customers with various profiles.

   Savings deposits provide easy access and flexibility in daily transactions, demand deposits are intended for individual and corporate customers who require more dynamic payment facilities, while time deposits offer higher returns with a certain period of time.

   The performance of the three types of savings products over the past 2 (two) years is reflected in the growth of the Bank's third party funds and is further outlined in the following table:

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

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

Uraian	2024	Komposisi Composition (%)	2023	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Tabungan	**52,529**	**66.84**	41,191	65.71	27.53	Savings Deposits
Giro	**3,114**	**3.96**	2,564	4.09	21.45	Demand Deposits
Deposito Berjangka	**22,759**	**28.96**	18,781	29.96	21.18	Time Deposits
Negotiable Certificate Deposits	**181**	**0.23**	150	0.24	20.67	Negotiable Certificate Deposits
Total	**78,583**	**100.00**	**62,686**	**100.00**	**25.36**	**Total**

Sepanjang tahun 2024, Bank berhasil menghimpun total rekening dana pihak ketiga sebesar 78.583 unit rekening, mengalami kenaikan sebesar 25,36% dibandingkan dengan tahun sebelumnya yang tercatat sebesar 62.686 unit rekening. Perubahan tersebut terutama dipengaruhi oleh produk tabungan yang mengalami peningkatan sebesar 27,53%.

Throughout 2024, the Bank managed to collect total of 78,583 account units of third party fund accounts, increased by 25.36% compared to that of the previous year of 62,686 account units. Such changes were mainly influenced by the savings deposits product which increased by 27.53%.

Pada tahun 2024, produk tabungan menjadi kontributor utama terhadap total rekening dana pihak ketiga dengan proporsi sebesar 66,84%, mencerminkan preferensi nasabah terhadap instrumen simpanan yang memberikan kemudahan akses dan fleksibilitas transaksi.

In 2024, the savings deposits product became the main contributor to the total accounts of third party funds, with a proportion of 66.84%, reflecting customer preferences for savings deposits instrument that provided easy access and transaction flexibility.

Total Dana Pihak Ketiga
Total Third-Party Funds

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

Uraian	2024	Komposisi Composition (%)	2023	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Tabungan	**3,286,886**	**14.09**	2,881,781	12.85	14.06	Savings Deposits
Giro	**2,914,891**	**12.49**	2,484,506	11.08	17.32	Demand Deposits
Deposito Berjangka	**16,701,533**	**71.58**	16,668,585	74.32	0.20	Time Deposits
Negotiable Certificate Deposits	**428,802**	**1.84**	394,309	1.76	8.75	Negotiable Certificate Deposits
Total	**23,332,112**	**100.00**	**22,429,180**	**100.00**	**4.03**	**Total**

Total dana pihak ketiga yang berhasil dihimpun Bank Victoria pada tahun 2024 tercatat sebesar Rp23,33 triliun, mengalami peningkatan sebesar 4,03% dibandingkan tahun sebelumnya yang tercatat sebesar Rp23,42 triliun. Peningkatan ini terutama didorong oleh pertumbuhan dana pada produk giro dan tabungan, yang masing-masing tumbuh sebesar 17,32% dan 14,06%.

The total third party funds collected by Bank Victoria in 2024 were recorded at Rp23.33 trillion, an increase of 4.03% compared to Rp23.42 trillion in the previous year. This increase was mainly driven by the growth of funds in demand deposits and savings deposits products, which respectively grew by 17.32% and 14.06%.

Meskipun terjadi peningkatan pada seluruh jenis produk simpanan, deposito berjangka masih menjadi kontributor utama dalam struktur dana pihak ketiga Bank Victoria, dengan komposisi sebesar 71,58% dari total dana pihak ketiga di tahun 2024.

Despite the increase in all types of savings deposits product, time deposits remained as the main contributor to Bank Victoria's third-party funds structure, with a composition of 71.58% of the total third-party funds in 2024.

2. Penyaluran Dana (Pinjaman)

Sebagai bagian dari pelaksanaan fungsi intermediasi, Bank menyalurkan dana dalam bentuk pinjaman kepada nasabah, baik perorangan maupun korporasi. Penyaluran kredit ini merupakan salah satu aktivitas utama Bank dalam mendukung pertumbuhan ekonomi serta mendorong produktivitas sektor riil.

Produk-produk pinjaman yang ditawarkan Bank Victoria dirancang untuk memenuhi kebutuhan pembiayaan yang beragam, dengan keunggulan berupa proses yang efisien, fleksibilitas tenor, serta penawaran tingkat suku bunga yang kompetitif. Bank juga terus melakukan evaluasi dan pengembangan terhadap skema kredit yang ditawarkan, agar tetap relevan dan menarik bagi segmen pasar yang dituju.

2. Lending (Loans)

As part of intermediation function implementation, the Bank carries out lending in form of loans to customers, both individuals and corporations. This lending is one main activity of the Bank in supporting economic growth and encouraging the productivity of real sector.

The loan products offered by Bank Victoria are designed to meet various financing needs, with advantages in the form of efficient processes, tenor flexibility, and competitive interest rate offerings. The Bank also continues to evaluate and develop credit schemes on offer, so that they remain relevant and attractive to the target market segment.

Adapun kinerja penyaluran pinjaman Bank selama 2 (dua) tahun terakhir mencerminkan pertumbuhan yang stabil, seiring dengan upaya Bank dalam menjaga kualitas portofolio kredit dan memperluas basis debitur. Rincian kinerja produk pinjaman tersebut disajikan dalam tabel berikut:

The Bank's lending performance over the past 2 (two) years reflects stable growth, in line with the Bank's efforts to maintain the quality of its loan portfolio and expand its debtor base. The details of loan products performance are presented in the following table:

Produk Pinjaman Berdasarkan Pihak
Loan Products by Party

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

Uraian	2024	Komposisi Composition (%)	2023	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Pihak Ketiga	**20,436,393**	**99.40**	18,484,847	99.23	10.56	Third Parties
Pihak Berelasi	**123,467**	**0.60**	143,896	0.77	(14.20)	Related Party
Total	**20,559,860**	**100.00**	**18,628,743**	**100.00**	**10.37**	**Total**

Sepanjang tahun 2024, penyaluran dana dalam bentuk kredit kepada pihak ketiga tercatat sebesar Rp20,44 triliun, mengalami kenaikan sebesar 10,56% dibandingkan tahun 2023 yang sebesar Rp18,48 triliun. Sementara itu, penyaluran dana kepada pihak berelasi mengalami penurunan sebesar 14,20%, dari Rp143,90 miliar pada tahun sebelumnya menjadi Rp123,47 miliar di tahun 2024. Secara komposisi, portofolio kredit Bank masih didominasi oleh pinjaman kepada pihak ketiga dengan porsi sebesar 99,40% dari total penyaluran pinjaman.

Throughout 2024, lending in the form of loans to third parties was recorded at Rp20.44 trillion, an increase of 10.56% compared to Rp18.48 trillion in 2023. Meanwhile, lending to related parties decreased by 14.20%, from Rp143.90 billion in the previous year to Rp123.47 billion in 2024. In terms of composition, the Bank's loan portfolio is still dominated by loans to third parties with a portion of 99.40% of the total lending.

Produk Pinjaman Berdasarkan Jenis Pinjaman
Loan Products by Types of Loans

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

Uraian	2024	Komposisi Composition (%)	2023	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Pinjaman Tetap	**10,085,769**	**49.06**	9,697,513	52.06	4.00	Fixed Loans
Pinjaman Konsumen	**167,347**	**0.81**	164,627	0.88	1.65	Consumer Loans
Pinjaman Rekening Koran	**2,122,250**	**10.32**	1,871,767	10.05	13.38	Overdraft Loans
Pinjaman Tetap dengan Angsuran	**8,110,450**	**39.45**	6,864,293	36.85	18.15	Fixed Loans with Installments
Pinjaman Serba Guna	**74,045**	**0.36**	30,543	0.16	142.43	Multi Purpose Loans
Total	**20,559,860**	**100.00**	**18,628,743**	**100.00**	**10.37**	**Total**

Pada periode 31 Desember 2024, Bank menyalurkan total pinjaman sebesar Rp20,56 triliun, meningkat sebesar 10,37% dibandingkan tahun 2023 yang tercatat sebesar Rp18,63 triliun. Peningkatan ini terutama ditopang oleh pertumbuhan pinjaman tetap dengan angsuran yang meningkat sebesar 18,15%, serta pinjaman tetap yang tumbuh sebesar 4,00%. Dari sisi komposisi portofolio pinjaman Bank Victoria masih didominasi oleh pinjaman tetap, dengan proporsi sebesar 49,06% dari total pinjaman yang disalurkan pada tahun 2024.

In the period of 31 December 2024, the Bank distributed total loans of Rp20.56 trillion, an increase of 10.37% compared to that of 2023 of Rp18.63 trillion. This increase was mainly supported by the growth of fixed loans with installments which increased by 18.15%, as well as fixed loans that grew by 4.00%. In terms of the composition, Bank Victoria's loan portfolio was still dominated by fixed loans, with a proportion of 49.06% of the total lending in 2024.

Produk Pinjaman Berdasarkan Sektor Ekonomi
Loan Products by Economic Sector

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

Uraian	2024	Komposisi Composition (%)	2023	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Lembaga Pembiayaan	**5,577,685**	**27.13**	5,563,012	29.86	0.26	Financing
Perdagangan, Restoran, dan Hotel	**4,092,649**	**19.91**	3,574,240	19.19	14.50	Trading, Restaurant, and Hotel
Industri	**3,015,057**	**14.66**	2,186,357	11.74	37.90	Industry
Real Estat	**2,476,933**	**12.05**	2,533,799	13.60	(2.24)	Real Estate
Konstruksi	**1,100,320**	**5.35**	737,807	3.96	49.13	Construction
Jasa-Jasa Sosial/Masyarakat	**417,107**	**2.03**	349,351	1.88	19.39	Social/Community Services
Lain-Lain	**3,880,110**	**18.87**	3,684,177	19.78	5.32	Others
Total	**20,559,860**	**100.00**	**18,628,743**	**100.00**	**10.37**	**Total**

Pada tahun 2024, sektor lembaga pembiayan memberikan kontribusi terbesar terhadap penyaluran pinjaman Bank Victoria, yaitu sebesar Rp5,58 triliun atau 27,13% dari total pinjaman. Sementara itu, sektor jasa-jasa sosial/masyarakat menjadi sektor dengan kontribusi terkecil, dengan nilai pinjaman sebesar Rp417,11 miliar atau 2,03% dari total pinjaman.

In 2024, the financing institution sector contributed the largest to Bank Victoria's lending, amounting to Rp5.58 trillion or 27.13% of total loans. Meanwhile, social/community services became the sector with the smallest contribution, with a loan value of Rp417.11 billion or 2.03% of total loans.

Produk Pinjaman UMKM
MSME Loan Products

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

Uraian	2024	Komposisi Composition (%)	2023	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Usaha Mikro	**-**	**-**	-	-	-	Micro Business
Usaha Kecil	**13,778**	**0.43**	16,499	0.54	(16.49)	Small Business
Usaha Menengah	**3,157,840**	**99.57**	3,037,478	99.46	3.96	Medium Business
Total	**3,171,618**	**100.00**	**3,053,977**	**100.00**	**3.85**	**Total**

Pada akhir tahun 2024, total pinjaman UMKM tercatat mengalami peningkatan sebesar 3,85%, dari sebelumnya sebesar Rp3,05 triliun pada akhir tahun 2023 menjadi Rp3,17 triliun. Peningkatan ini terutama berasal segmen usaha menengah yang mengalami pertumbuhan sebesar 3,96% dibandingkan tahun sebelumnya.

At the end of 2024, the total MSME loans increased by 3.85%, from previously Rp3.05 trillion at the end of 2023 to Rp3.17 trillion. This increase mainly came from the medium-sized business segment which grew by 3.96% compared to that of the previous year.

3. Jasa Layanan

Bank Victoria menyediakan berbagai layanan penunjang untuk mendukung kemudahan dan kenyamanan nasabah dalam bertransaksi. Layanan tersebut mencakup transaksi kliring, pembayaran tagihan *postpaid* dan *prepaid*, pembayaran Telkom, pembayaran gaji karyawan (*payroll*), hingga fasilitas layanan perbankan melalui ATM Victoria.

Berbagai layanan ini dirancang untuk menjawab kebutuhan transaksi keuangan nasabah, baik individu maupun korporasi, dengan tetap mengedepankan efisiensi, kecepatan, dan keandalan sistem. Bank juga terus berupaya melakukan

3. Services

Bank Victoria provides various supporting services to support customer convenience and comfort in transactions. The services include clearing transaction, postpaid and prepaid bill payments, Telkom payment, employee salary payment (payroll), to banking service facilities through ATM Victoria.

These various services are designed to address financial transaction needs of customers, both individuals and corporations, while still prioritizing efficiency, speed, and system reliability. The Bank also strives to develop and enhance

pengembangan dan penyempurnaan layanan guna meningkatkan kepuasan nasabah dan daya saing layanan perbankan secara berkelanjutan.

Kinerja layanan perbankan Bank Victoria dalam 2 (dua) tahun terakhir diuraikan dalam tabel berikut:

services to improve customer satisfaction and banking service competitiveness on an ongoing basis.

The performance of Bank Victoria's banking services in the past 2 (two) years is outlined in the following table:

Layanan Keuangan
Financial Services

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

Uraian	2024	Komposisi Composition (%)	2023	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Kliring	**156,031**	**18.90**	584,733	29.78	(73.32)	Clearing
Postpaid	**6,823**	**0.83**	7,748	0.39	(11.94)	Postpaid
Prepaid	**133**	**0.02**	111	0.01	19.82	Prepaid
Pembayaran Telkom	**8,238**	**1.00**	8,429	0.43	(2.27)	Telkom Payment
Pembayaran Gaji Karyawan	**100,784**	**12.21**	92,026	4.69	9.52	Employees' Salary Payments
ATM Victoria	**553,746**	**67.06**	1,270,649	64.71	(56.42)	ATM Victoria
Total	**825,755**	**100.00**	**1,963,696**	**100.00**	**(57.95)**	**Total**

Per 31 Desember 2024, jasa layanan keuangan Bank Victoria tercatat sebesar Rp825,76 miliar. Jumlah tersebut mengalami penurunan sebesar 57,95% dibandingkan dengan periode sebelumnya pada tahun 2023 yang tercatat sebesar Rp1,96 triliun. Menurunnya pendapatan dari jasa layanan keuangan Bank terutama dipengaruhi oleh penurunan layanan ATM Victoria sebesar 56,42%.

As of 31 December 2024, Bank Victoria's financial services were recorded at Rp825.76 billion. This amount decreased by 57.95% compared to that of the previous period in 2023 of Rp1.96 trillion. The decline in income from the Bank's financial services was mainly due to the decrease in Victoria's ATM services by 56.42%.

Layanan Bank Devisa
Foreign Exchange Bank Services

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

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

Uraian	2024	Komposisi Composition (%)	2023	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Giro	**808**	**65.00**	738	66.79	9.49	Demand Deposits
Deposito Berjangka	**435**	**35.00**	367	33.21	18.53	Time Deposits
Total	**1,243**	**100.00**	**1,105**	**100.00**	**12.49**	**Total**

Pada tahun 2024, total rekening dana pihak ketiga dari layanan bank devisa meningkat sebesar 12,49% dari 1.105 unit rekening di tahun 2023 menjadi 1.243 unit rekening di tahun 2024. Total rekening produk giro tercatat meningkat sebesar 9,49%, sementara total rekening produk deposito berjangka juga mengalami peningkatan sebesar 18,53% dibandingkan tahun sebelumnya.

In 2024, the total accounts of third party funds from foreign exchange bank services increased by 12.49% from 1,105 account units in 2023 to 1,243 account units in 2024. The total accounts of demand deposits product increased by 9.49%, while the total accounts of time deposits product also increased by 18.53% compared to those of the previous year.

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

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

Uraian	2024	Komposisi Composition (%)	2023	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Giro	**69,851**	**8.10**	66,622	9.64	4.85	Demand Deposits
Deposito Berjangka	**792,560**	**91.90**	624,321	90.36	26.95	Time Deposits
Total	**862,411**	**100.00**	**690,943**	**100.00**	**24.82**	**Total**

Sejalan dengan meningkatnya total rekening dana pihak ketiga dari layanan bank devisa di tahun 2024, jumlah dana yang berhasil dihimpun juga mengalami peningkatan sebesar 24,82%, dari sebelumnya sebesar Rp690,94 miliar di tahun 2023 menjadi Rp862,41 miliar di tahun 2024. Perubahan tersebut terutama didorong oleh peningkatan dana pihak ketiga layanan bank devisa produk deposito berjangka sebesar 26,95%.

In line with the increase in the total accounts of third-party funds from foreign exchange bank services in 2024, the total funding also increased by 24.82%, from previously Rp690.94 billion in 2023 to Rp862.94 billion in 2024. Such change was mainly driven by an increase in third-party funds from foreign exchange bank services for time deposits product by 26.95%.

Transaksi Melalui Jaringan Layanan Utama
Transactions through the Main Service Network

Jumlah Transaksi
Total Transactions

Uraian	2024	Komposisi Composition (%)	2023	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Mobile Banking	**1,782,570**	**73.85**	1,765,192	71.38	0.98	Mobile Banking
Internet Banking	**11,965**	**0.50**	17,118	0.69	(30.10)	Internet Banking
Teller	**139,368**	**5.77**	156,012	6.31	(10.67)	Teller
ATM	**479,794**	**19.88**	534,724	21.62	(10.27)	ATM
Total	**2,413,697**	**100.00**	**2,473,046**	**100.00**	**(2.40)**	**Total**

Pada tahun 2024, total jumlah transaksi Bank Victoria tercatat sebanyak 2.413.697 transaksi. Kanal *mobile banking* masih mendominasi sebagai saluran transaksi utama, diikuti oleh ATM, sementara kontribusi dari *Internet Banking* dan *teller* tercatat relatif kecil. Komposisi ini menunjukkan bahwa preferensi nasabah tetap berfokus pada layanan digital yang praktis dan mudah diakses.

In 2024, the total number of transactions at Bank Victoria was 2,413,697 transactions. The mobile banking channel still dominated as the main transaction channel, followed by ATMs, while the contribution from Internet Banking and tellers was relatively small. This composition shows that customer preferences remain focused on practical and easily accessible digital services.

Nilai Transaksi
Transaction Value

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

Uraian	2024	Komposisi Composition (%)	2023	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Mobile Banking	**20,740,368**	**23.85**	9,747,257	14.25	112.78	Mobile Banking
Internet Banking	**659,971**	**0.76**	479,592	0.70	37.61	Internet Banking

Uraian	2024	Komposisi Composition (%)	2023	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Teller	**65,226,852**	**75.01**	57,782,495	84.48	12.88	Teller
ATM	**331,082**	**0.38**	384,727	0.56	(13.94)	ATM
Total	**86,958,273**	**100.00**	68,394,071	100.00	27.14	**Total**

Pada tahun 2024, total nilai transaksi Bank Victoria tercatat sebesar Rp86,96 triliun. *Teller* menjadi kontributor terbesar terhadap total nilai transaksi, diikuti oleh *mobile banking* dan *internet banking*, sedangkan ATM mencatatkan kontribusi yang lebih kecil. Komposisi ini menunjukkan pergeseran preferensi nasabah ke arah transaksi digital berbasis *mobile*.

In 2024, the total transaction value of Bank Victoria was Rp86.96 trillion. Teller was the largest contributor to the total transaction value, followed by mobile banking and internet banking, while ATMs recorded a smaller contribution. This composition shows a shift in customer preferences towards mobile-based digital transactions.

Pendapatan dan Profitabilitas

Pada tahun 2024, Bank Victoria tetap berfokus pada 1 (satu) segmen usaha yaitu segmen konvensional. Selain itu, Bank juga mengelompokkan laporan berdasarkan segmen geografis, yang dibedakan menurut wilayah operasional untuk mencerminkan perbedaan risiko dan imbal hasil antar daerah. Segmen gerografis yang dilaporkan mencakup wilayah Jadetabek, Jawa Barat, Jawa Tengah dan Jawa Timur, serta Luar Jawa.

Kinerja pendapatan dan profitabilitas dari masing-masing segmen usaha dan segmen geografis untuk tahun 2024 dan 2023 diuraikan dalam tabel berikut:

Income and Profitability

In 2024, Bank Victoria continued its focus on 1 (one) business segment, namely the conventional segment. In addition, the Bank also groups reports based on geographical segments, differentiated by operational area to reflect differences in risk and return between regions. The reported geographical segment includes Jadetabek region, West Java, Central Java and East Java, and Non Java.

The income and profitability performances of each business segment and geographic segment for 2024 and 2023 are outlined in the following table:

Segmen Usaha
Business Segment

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

Uraian	2024	2023	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
Pendapatan Bunga Bersih	**548,601**	578,729	(30,128)	(5.21)	Interest Income - Net
Pendapatan Operasional Lainnya	**365,736**	253,365	112,371	44.35	Other Operating Income
Beban Operasional Lainnya	**(621,366)**	(658,023)	(36,657)	(5.57)	Other Operating Expenses
Laba Operasional	**292,970**	174,071	118,899	68.30	Profit from Operations
Total Aset	**31,045,989**	29,624,240	1,421,749	4.80	Total Assets
Total Liabilitas	**27,112,530**	25,799,455	1,313,075	5.09	Total Liabilities

Pada akhir periode 2024, Bank Vicroria mencatatkan pendapatan bunga – bersih sebesar Rp548,60 miliar, atau menurun sebesar 5,21% dibandingkan dengan tahun 2023 yang tercatat sebesar Rp578,73 miliar. Sementara itu, pendapatan operasional lainnya mengalami peningkatan signifikan sebesar 44,35% dari sebelumnya Rp253,37 miliar menjadi Rp365,74 miliar pada tahun 2024.

At the end of the 2024 period, Bank Victoria recorded net interest income of Rp548.60 billion, or decreased by 5.21% compared to Rp578.73 billion in 2023. Meanwhile, other operating income increased significantly by 44.35% from previously Rp253.37 billion to Rp365.74 billion in 2024.

Dari segi profitabilitas, laba operasional meningkat sebesar 68,30%, dari Rp174,07 miliar di tahun 2023 menjadi Rp292,97 miliar pada tahun 2024. Adapun total aset dan total liabilitas masing-masing mengalami pertumbuhan sebesar 4,80% dan 5,09% pada akhir tahun 2024 dibandingkan dengan tahun sebelumnya.

In terms of profitability, profit from operations increased by 68.30%, from Rp174.07 billion in 2023 to Rp292.97 billion in 2024. Meanwhile, the total assets and total liabilities grew by 4.80% and 5.09%, respectively, at the end of 2024 compared to those of the previous year.

Segmen Geografis
Geographical Segment

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

Uraian Description	Jadetabek	Jawa Barat West Java	Jawa Tengah dan Jawa Timur Central Java and East Java	Luar Jawa Non Java	Total
2024					
Pendapatan Bunga Bersih **Interest Income - Net**	**549,423**	**11,106**	**20,835**	**(32,763)**	**548,601**
Pendapatan Operasional Lainnya **Other Operating Income**	**345,167**	**1,480**	**8,441**	**10,648**	**365,736**
Laba (Rugi) Operasional **Profit (Loss) from Operations**	**341,862**	**2,425**	**3,679**	**(54,996)**	**292,970**
Total Aset **Total Assets**	**29,256,280**	**292,161**	**1,159,177**	**338,371**	**31,045,989**
Total Liabilitas **Total Liabilities**	**24,853,242**	**318,504**	**1,017,511**	**923,273**	**27,112,530**
2023					
Pendapatan Bunga Bersih Interest Income - Net	605,904	7,713	(5,953)	(28,934)	578,729
Pendapatan Operasional Lainnya Other Operating Income	244,425	2,810	3,732	2,398	253,365
Laba (Rugi) Operasional Profit (Loss) from Operations	254,533	2,492	(39,104)	(43,849)	174,071
Total Aset Total Assets	28,781,507	245,132	398,883	198,719	29,624,240
Total Liabilitas Total Liabilities	23,861,711	260,086	756,951	920,707	25,799,455
Kenaikan (Penurunan) (%) **Increase (Decrease) (%)**					
Pendapatan Bunga Bersih Interest Income - Net	(9.32)	43.99	449.98	(13.23)	(5.21)
Pendapatan Operasional Lainnya Other Operating Income	41.22	(47.35)	126.17	344.02	44.35
Laba (Rugi) Operasional Profit (Loss) from Operations	34.31	(2.66)	109.41	(25.42)	68.30
Total Aset Total Assets	1.65	19.19	190.61	70.28	4.80
Total Liabilitas Total Liabilities	4.16	22.46	34.42	0.28	5.09

Pada akhir periode 2024, wilayah Jawa Tengah dan Jawa Timur mencatatkan pertumbuhan pendapatan bunga – bersih tertinggi sebesar 449,98%, disusul oleh wilayah Jawa Barat dengan pertumbuhan sebesar 43,99%. Sementara itu, wilayah Jadetabek mencatatkan penurunan pendapatan bunga – bersih sebesar 9,32%.

At the end of the 2024 period, Central Java and East Java regions recorded the highest growth in net interest income of 449.98%, followed by West Java region with a growth of 43.99%. Meanwhile, Jadetabek region recorded a decrease in net interest income of 9.32%.

Dari sisi profitabilitas, wilayah Jadetabek mencatatkan peningkatan laba operasional tertinggi sebesar 34,31%, dari sebelumnya sebesar Rp254,53 miliar menjadi Rp341,86 miliar di tahun 2024. Sebaliknya, wilayah Luar Jawa mencatatkan peningkatan rugi operasional sebesar 25,42%, dari sebelumnya rugi sebesar Rp43,85 miliar menjadi Rp54,99 miliar pada tahun 2024.

In terms of profitability, Jadetabek region recorded the highest increase in profit from operations of 34.31%, from previously Rp254.53 billion to Rp341.86 billion in 2024. Conversely, Non Java region recorded an increase in loss from operations of 25.42%, from previously loss of Rp43.85 billion to Rp54.99 billion in 2024.

Sementara itu, total aset dan total liabilitas di seluruh segmen geografis mengalami pertumbuhan. Wilayah Jawa Tengah dan Jawa Timur mencatatkan pertumbuhan tertinggi untuk total aset sebesar 190,61%, dan total liabilitas sebesar 34,42%. Di sisi lain, pertumbuhan total aset terendah tercatat di wilayah Jadetabek sebesar 1,65%, dan pertumbuhan total liabilitas terendah tercatat di wilayah Luar Jawa sebesar 0,28%.

Prospek Usaha 2025

Perekonomian global pada tahun 2025 diproyeksikan tumbuh dalam kisaran 2,7-3,3%, meskipun masih dibayangi sejumlah ketidakpastian, seperti kebijakan ekonomi dan geopolitik global, pelambatan ekonomi di beberapa negara, tekanan inflasi, ketidakstabilan pasar keuangan, perubahan iklim, serta gangguan rantai pasok.

Sementara itu, pertumbuhan ekonomi nasional diperkirakan tetap solid pada kisaran 4,7-5,5% dan akan meningkat pada tahun 2026 menjadi 4,8-5,6%. Pemerintah bersama Bank Indonesia terus mendorong pertumbuhan melalui sinergi antara kebijakan fiskal dan bauran kebijakan moneter. Dari sisi penawaran, reformasi struktural diarahkan untuk memperkuat sektor-sektor ekonomi yang padat karya, sedangkan dari sisi permintaan, akselerasi digitalisasi sistem pembayaran serta stimulus kebijakan makroprudensial terus dioptimalkan.

Dalam prospek perekonomian yang tetap positif, pertumbuhan kredit perbankan pada tahun 2025 diprakirakan berada di kisaran 11–13%. Adapun tingkat inflasi diperkirakan tetap terkendali, sejalan dengan kenaikan BI-Rate yang mampu menjaga ekspektasi inflasi tetap dalam batas yang ditetapkan.

Sumber:
- Bank Indonesia, "Laporan Perekonomian Indonesia 2024"; dan
- Kementerian Koordinator Bidang Perekonomian Republik Indonesia, "Siaran Pers : Tatap Perekonomian 2025, Pemerintah Siapkan Sejumlah Strategi Menghadapi Tantangan Ketidakpastian Global, 18 Februari 2025".

Strategi dan Rencana Kerja 2025

Bank Victoria telah menetapkan target jangka pendek untuk 1 (satu) tahun ke depan serta target jangka menengah untuk 3 (tiga) tahun mendatang, dengan tetap mengacu pada visi dan misi Bank, arah kebijakan, kondisi internal, serta dinamika eksternal yang diproyeksikan pada tahun 2025. Strategi disusun dengan tujuan menjaga pertumbuhan dan kinerja usaha yang positif, sekaligus memperkuat daya saing di tengah persaingan industri perbankan yang semakin ketat. Adapun target jangka pendek yang ingin dicapai Bank Victoria pada tahun 2025 meliputi:

1. Menjaga rasio kecukupan modal (CAR) tetap kuat untuk mengantisipasi potensi risiko serta penyesuaian terhadap ketentuan permodalan yang lebih ketat;

Meanwhile, the total assets and total liabilities across all geographical segments experienced growth. The Central Java and East Java regions recorded the highest growth for total assets at 190.61%, and total liabilities at 34.42%. On the other hand, the lowest growth in total assets was recorded in Jadetabek region at 1.65%, and the lowest growth in total liabilities was recorded in Non Java region at 0.28%.

2025 Business Outlook

The global economy in 2025 is projected to grow in the range of 2.7-3.3%, though it is still overshadowed by a number of uncertainties, such as global economic and geopolitical policies, economic slowdown in several countries, inflationary pressures, financial market instability, climate change, and supply chain disruptions.

Meanwhile, the national economic growth is expected to remain solid in the range of 4.7-5.5% and will increase in 2026 to 4.8-5.6%. The government, together with Bank Indonesia, continues to encourage growth through synergy between fiscal policy and monetary policy mix. From supply side, structural reforms are directed at strengthening labor-intensive economic sectors, while from the demand side, the digitalization acceleration of payment system and macroprudential policy stimulus continue to be optimized.

In the positive economic outlook, banking loan growth in 2025 is predicted to be in the range of 11-13%. The inflation rate is predicted to remain under control, in line with the increase in BI-Rate which is able to keep inflation expectations within the set limits.

Source:
- Bank Indonesia, "Indonesia Economic Report 2024"; and
- Coordinating Ministry for Economic Affairs of the Republic of Indonesia, "Press Release: Facing Economy 2025, the Government Prepares a Number of Strategies to Face Challenges of Global Uncertainty, 18 February 2025".

Strategies and Work Plans in 2025

Bank Victoria has set short-term targets for the next 1 (one) year and medium-term targets for the next 3 (three) years, while still referring to the Bank's vision and mission, policy direction, internal conditions, and external dynamics projected in 2025. Strategy are prepared with the aim of maintaining positive business growth and performance, while strengthening competitiveness amidst the increasingly tight competition in banking industry. The short-term targets to be achieved by Bank Victoria in 2025 include:

1. Maintaining strong capital adequacy ratio (CAR) to anticipate potential risks and adjustments to tighter capital provisions;

2. Mendorong pertumbuhan dana pihak ketiga, kredit, dan total aset dengan mempertimbangkan kondisi ekonomi yang masih berisiko terhadap perlambatan;
3. Melanjutkan pelaksanaan Penawaran Umum Berkelanjutan (PUB) dan rencana penerbitan *Negotiable Certificate of Deposit* (NCD);
4. Mempertahankan pertumbuhan margin dengan proyeksi *net interest margin* (NIM) di atas 2,0%, melalui pengendalian biaya dana (*cost of fund)*;
5. Menambah jaringan kantor baru secara selektif guna memperluas jangkauan geografis dan melakukan optimalisasi terhadap jaringan cabang yang ada melalui evaluasi kinerja secara berkala;
6. Melanjutkan pengembangan produk dan layanan berbasis inovasi untuk meningkatkan kepuasan dan loyalitas nasabah;
7. Menurunkan nilai agunan yang diambil alih (AYDA) serta meningkatkan kualitas kredit dengan menurunkan NPL neto;
8. Menerapkan dan mengembangkan sistem informasi manajemen berbasis teknologi informasi yang andal dan aman untuk mendukung layanan perbankan yang efisien dan terpercaya; dan
9. Mengimplementasikan perbaikan berkelanjutan dalam penerapan GCG dan penguatan manajemen risiko secara menyeluruh.

Dalam jangka menengah hingga akhir tahun 2027, Bank Victoria menetapkan sejumlah target strategis yang difokuskan pada penguatan fundamental bisnis dan keberlanjutan usaha. Target ini dirancang untuk mendorong pertumbuhan yang sehat, efisien, dan berwawasan keberlanjutan, dengan tetap mengedepankan prinsip kehati-hatian serta kepatuhan terhadap ketentuan yang berlaku. Adapun sasaran yang ingin dicapai Bank antara lain:

1. Melanjutkan strategi pengembangan bisnis secara organik, dengan mengoptimalkan sinergi dalam Grup untuk mendorong pertumbuhan yang lebih terintegrasi;
2. Memperbaiki struktur pendanaan, khususnya melalui peningkatan komposisi dana murah (CASA) dalam total dana pihak ketiga, guna menekankan biaya dana (*cost of fund)* dan memperkuat efisiensi keuangan;
3. Melanjutkan komitmen terhadap penguatan GCG yang memadai dan sesuai ketentuan regulator agar seluruh proses berjalan optimal dan transparan;
4. Meningkatkan investasi strategis di bidang teknologi informasi, khususnya dalam hal efisiensi proses, penguatan kontrol, peningkatan kualitas layanan, serta mendorong produktivitas operasional secara keseluruhan, dengan tetap menjaga beban operasional di tingkat yang wajar; dan
5. Bertransformasi menjadi lembaga keuangan yang mampu mendorong pertumbuhan ekonomi secara berkelanjutan bagi masyarakat, antara lain melalui perluasan layanan inklusi keuangan, peningkatan literasi keuangan, pemberian kredit yang bertanggung jawab terhadap lingkungan, penciptaan lingkungan kerja yang sehat dan produktif bagi karyawan, serta penerapan etika bisnis dan kepatuhan terhadap seluruh peraturan yang berlaku, dalam rangka mendukung keberhasilan implementasi Rencana Aksi Keuangan Berkelanjutan (RAKB).

2. Encouraging growth in third party funds, loans, and total assets with due observance of economic conditions which are still at risk of slowdown;
3. Continuing the implementation of Sustainable Public Offering (PUB) and the plan to issue Negotiable Certificates of Deposit (NCD);
4. Maintaining margin growth with a projected net interest margin (NIM) of above 2.0%, through controlling the cost of funds;
5. Adding new office networks selectively to expand geographic reach and optimizing existing branch networks through periodic performance evaluations;
6. Continuing product development and innovation-based services to increase customer satisfaction and loyalty;
7. Reducing the value of foreclosed assets (AYDA) and improving credit quality by reducing net NPL;
8. Implementing and developing reliable and secure information technology-based management information systems to support efficient and trusted banking services; and
9. Implementing continuous improvement in carrying out GCG and strengthening risk management thoroughly.

In medium term until the end of 2027, Bank Victoria sets a number of strategic targets focused on strengthening business fundamentals and business sustainability. These targets are designed to encourage healthy, efficient, and sustainable growth, while still prioritizing the principle of prudence and compliance with applicable regulations. The targets to be achieved by the Bank include:

1. Continuing the organic business development strategy, by optimizing synergies within the Group to encourage more integrated growth;
2. Improving funding structure, particularly by increasing the composition of low-cost funds (CASA) in total third-party funds, to emphasize the cost of funds and strengthen financial efficiency;
3. Continuing the commitment to strengthening GCG in an adequate manner and in accordance with regulatory provisions, so that all processes run optimally and transparently;
4. Increasing strategic investment in information technology, particularly in process efficiency, strengthening control, improving service quality, and encouraging overall operational productivity, while maintaining operational costs at a reasonable level; and
5. Transforming into a financial institution that can drive sustainable economic growth for the community, including through expanding financial inclusion services, increasing financial literacy, providing environmentally responsible lending, creating a healthy and productive work environment for employees, and implementing business ethics and compliance with all applicable regulations, to support the successful implementation of the Sustainable Finance Action Plan (RAKB).

Tinjauan Keuangan
Financial Overview

Laporan Posisi Keuangan [POJK C.3]
Statement of Financial Position

Aset
Assets

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

Uraian	2024	2023	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
Aset Keuangan **Financial Assets**					
Kas	**71,600**	92,821	(21,221)	(22.86)	Cash
Giro pada Bank Indonesia	**1,401,053**	1,493,077	(92,024)	(6.16)	Current Accounts with Bank Indonesia
Giro pada Bank Lain	**114,473**	296,297	(181,824)	(61.37)	Current Account with Other Banks
Penempatan pada Bank Indonesia dan Bank Lain Bersih	**12,197**	915,369	(903,171)	(98.67)	Placements with Bank Indonesia and Other Banks- Net
Efek-Efek Bersih	**7,462,723**	6,277,292	1,185,431	18.88	Marketable Securities - Net
Efek-Efek yang Dibeli dengan Janji Dijual Kembali	**197,776**	636,733	(438,957)	(68.94)	Securities Purchased under Resale Agreement
Pendapatan Bunga yang Masih akan Diterima Bersih	**314,751**	368,408	(53,656)	(14.56)	Interest Income Receivables – Net
Pinjaman yang Diberikan – Bersih	**20,112,894**	18,053,871	2,059,023	11.43	Loans - Net
Tagihan Akseptasi	**17,792**	12,475	5,317	42.62	Acceptance Receivables
Penyertaan Saham	**219,934**	215,931	4,003	1.85	Investments in Shares
Aset Lain-Lain Bersih	**171,114**	91,463	79,651	87.09	Other Assets - Net
Total Aset Keuangan	**30,096,308**	**28,453,735**	**1,642,573**	**5.77**	**Total Financial Assets**
Aset Non Keuangan **Non-Financial Assets**					
Biaya Dibayar di Muka	**31,144**	25,465	5,679	22.30	Prepaid Expenses
Aset Tetap dan Aset Hak Guna Bersih	**391,434**	423,227	(31,794)	(7.51)	Fixed Assets and Right-of-Use Assets - Net
Agunan yang Diambil Alih Bersih	**378,984**	550,616	(171,632)	(31.17)	Foreclosed Assets - Net
Aset Tak Berwujud Bersih	**11,099**	8,193	2,907	35.48	Intangible Assets - Net
Aset Pajak Tangguhan Bersih	**137,021**	163,004	(25,983)	(15.94)	Deferred Tax Assets - Net
Total Aset Non-Keuangan	**949,681**	**1,170,505**	**(220,824)**	**(18.87)**	**Total Non-Financial Assets**
Total Aset	**31,045,989**	**29,624,240**	**1,421,749**	**4.80**	**Total Assets**

Total Aset

Per 31 Desember 2024, total aset Bank Victoria tercatat sebesar Rp31,05 triliun, meningkat 4,80% dibandingkan dengan posisi tahun sebelumnya sebesar Rp29,62 triliun. Peningkatan ini terutama didorong oleh meningkatnya nilai aset keuangan yang tumbuh sebesar 5,77%.

Total Assets

As of 31 December 2024, Bank Victoria's total assets were recorded at Rp31.05 trillion, an increase of 4.80% compared to the previous year's position of Rp29.62 trillion. This increase was mainly driven by the increase in financial assets' value which grew by 5.77%.

Total Aset Keuangan

Total aset keuangan Bank pada tahun 2024 mencapai Rp30,10 triliun, meningkat dari Rp28,45 triliun pada tahun sebelumnya. Kenaikan sebesar 5,77% tersebut terutama berasal dari peningkatan penyaluran pinjaman bersih sebesar 11,40% atau setara dengan Rp2,06 triliun.

Total Aset Non-Keuangan

Sementara, total aset non-keuangan Bank mengalami penurunan sebesar 18,87%, dari Rp1,17 triliun pada tahun 2023 menjadi Rp949,68 miliar pada tahun 2024. Penurunan ini terutama disebabkan oleh turunnya nilai agunan yang diambil alih (AYDA) sebesar 31,17%.

Total Financial Assets

The Bank's total financial assets in 2024 reached Rp30.10 trillion, an increase from Rp28.45 trillion in the previous year. The increase of 5.77% mainly came from an increase in net lending of 11.40% or equivalent to Rp2.06 trillion.

Total Non-Financial Assets

Meanwhile, the Bank's total non-financial assets decreased by 18.87%, from Rp1.17 trillion in 2023 to Rp949.68 billion in 2024. This decrease was mainly due to a decrease in the value of foreclosed collateral (AYDA) by 31.17%.

Liabilitas
Liabilities

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

Uraian	2024	2023	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
Liabilitas Keuangan Financial Liabilities					
Simpanan Nasabah	**23,332,112**	22,429,180	902,931	4.03	Deposit from Customers
Simpanan dari Bank Lain	**591,018**	1,104,803	(513,785)	(46.50)	Deposits from Other Banks
Efek-efek yang Dijual dengan Janji Dibeli Kembali	**587,475**	643,267	(55,792)	(8.67)	Securities Sold under Repurchase Agreement
Efek-Efek yang Diterbitkan	**2,289,413**	1,347,640	941,773	69.88	Securities Issued
Utang Akseptasi	**17,005**	11,960	5,045	42.18	Acceptance Payables
Akrual dan Liabilitas Lain-Lain	**215,052**	193,458	21,595	11.16	Accruals and Other Liabilities
Total Liabilitas Keuangan	**27,032,075**	**25,730,307**	**1,301,767**	**5.06**	**Total Financial Liabilities**
Liabilitas Non Keuangan Non-Financial Liabilities					
Utang Pajak	**26,452**	29,310	(2,858)	(9.75)	Taxes Payable
Liabilitas Imbalan Kerja Karyawan	**54,003**	39,838	14,166	35.56	Employee Benefits Obligation
Total Liabilitas Non-Keuangan	**80,455**	**69,148**	**11,307**	**16.35**	**Total Non-Financial Liabilities**
Total Liabilitas	**27,112,530**	**25,799,455**	**1,313,075**	**5.09**	**Total Liabilities**

Total Liabilitas

Pada akhir tahun 2024, total liabilitas Bank Victoria tercatat sebesar Rp27,11 triliun, meningkat 5,09% dibandingkan tahun sebelumnya yang sebesar Rp25,80 triliun. Kenaikan ini terutama didorong oleh peningkatan liabilitas keuangan sebesar 5,06% dan liabilitas non sebesar 16,35%.

Total Liabilitas Keuangan

Liabilitas keuangan meningkat dari Rp25,73 triliun pada tahun 2023 menjadi Rp27,03 triliun di tahun 2024 atau tumbuh 5,06%. Pertumbuhan ini terutama disebabkan oleh peningkatan efek-efek yang diterbitkan sebesar 69,88% dan simpanan nasabah yang meningkat sebesar 4,03%.

Total Liabilitas Non-Keuangan

Liabilitas non-keuangan pada tahun 2024 tercatat sebesar Rp80,46 miliar, tumbuh 16,35% dibandingkan dengan tahun 2023 yang sebesar Rp69,15 miliar. Kenaikan ini terutama disebabkan oleh bertambahnya liabilitas imbalan kerja karyawan sebesar 35,56%.

Total Liabilities

At the end of 2024, Bank Victoria's total liabilities were recorded at Rp27.11 trillion, an increase of 5.09% compared to Rp25.80 trillion in the previous year. This increase was mainly driven by an increase in financial liabilities of 5.06% and non-liabilities of 16.35%.

Total Financial Liabilities

Financial liabilities increased from Rp25.73 trillion in 2023 to Rp27.03 trillion in 2024 or grew by 5.06%. This growth was mainly due to an increase in securities issued by 69.88% and deposit from customers which increased by 4.03%.

Total Non-Financial Liabilities

Non-financial liabilities in 2024 were recorded at Rp80.46 billion, grew by 16.35% compared to Rp69.15 billion in 2023. This increase was mainly due to an increase in employee benefit obligation of 35.56%.

Ekuitas
Equity

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

Uraian	2024	2023	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
Ekuitas yang dapat Diatribusikan kepada Pemilik Entitas Induk **Equity Attributable to Equity Holders of the Parent Entity**					
Modal Ditempatkan dan Disetor Penuh	**1,584,853**	1,584,824	30	0.00	Issued and Fully Paid Capital
Tambahan Modal Disetor	**668,371**	668,685	(314)	(0.05)	Additional Paid-In Capital
Kerugian yang Belum Direalisasi Atas Perubahan Nilai Wajar Efek-Efek yang Diukur pada Nilai Wajar Melalui Penghasilan Komprehensif Lain, Setelah Pajak	**(25,504)**	(16,832)	8,672	51.52	Unrealised Loss on Changes in Fair Value of Marketable Securities Measured at Fair Value through Other Comprehensive Income, Net of Tax
Surplus Revaluasi Aset Tetap, Setelah Pajak	**316,445**	382,456	(66,011)	(17.26)	Gain on Revaluation of Fixed Assets, Net of Tax
Pengukuran Kembali atas Liabilitas Imbalan Kerja, Setelah Pajak	**11,058**	19,467	(8,409)	(43.20)	Remeasurements on Employee Benefit Liabilities, Net of Tax
Saldo Laba:					Retained Earnings:
Telah Ditentukan Penggunaannya	**227,200**	202,200	25,000	12.36	Appropriated
Belum Ditentukan Penggunaannya	**1,151,036**	983,986	167,050	16.98	Unappropriated
Total Ekuitas	**3,933,459**	**3,824,785**	**108,675**	**2.84**	**Total Equity**

Total Ekuitas

Pada tahun 2024, Bank Victoria mencatatkan total ekuitas sebesar Rp3,93 triliun, meningkat 2,84% dibandingkan dengan tahun 2023 yang sebesar Rp3,82 triliun. Peningkatan ini terutama berasal dari kenaikan saldo laba belum ditentukan penggunaannya yang tumbuh sebesar 16,98% dari Rp983,99 miliar menjadi Rp1,15 triliun di tahun 2024, serta saldo laba yang telah ditentukan penggunaannya yang meningkat sebesar 12,36%.

Total Equity

In 2024, Bank Victoria recorded total equity of Rp3.93 trillion, an increase of 2.84% compared to that of 2023 of Rp3.82 trillion. This increase was mainly due to an increase in unappropriated retained earnings which grew by 16.98% from Rp983.99 billion to Rp1.15 trillion in 2024, as well as appropriated retained earnings which increased by 12.36%.

Laporan Laba Rugi dan Penghasilan Komprehensif Lain
Statements of Profit or Loss and Other Comprehensive Income

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

Uraian	2024	2023	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
Pendapatan Bunga	**2,076,268**	1,836,391	239,877	13.06	Interest Income
Beban Bunga	**(1,527,667)**	(1,257,662)	270,005	21.47	Interest Expenses
Pendapatan Bunga Bersih	**548,601**	578,729	(30,128)	(5.21)	Interest Income - Net
Pendapatan Operasional Lainnya	**365,736**	253,365	112,371	44.35	Other Operating Income
Beban Operasional Lainnya	**(621,366)**	(658,023)	(36,657)	(5.57)	Other Operating Expenses
Laba Operasional	**292,970**	174,071	118,899	68.30	Profit from Operations
Beban Non-Operasional Bersih	**(144,310)**	(44,535)	99,775	224.04	Non-Operating Expenses - Net
Laba Sebelum Beban Pajak Penghasilan	**148,660**	129,536	19,124	14.76	Earnings Before Income Tax Expense
Beban Pajak Penghasilan Bersih	**(30,801)**	(27,720)	3,081	11.11	Income Tax Expenses - Net

Uraian	2024	2023	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
Laba Bersih Tahun Berjalan	**117,859**	101,816	16,043	15.76	Net Profit for the Year
Penghasilan (Rugi) Komprehensif Lain, Setelah Pajak Penghasilan	**(83,091)**	24,405	(107,497)	(440.47)	Other Comprehensive Income (Loss), Net of Income Tax
Jumlah Penghasilan Komprehensif	**34,768**	126,222	(91,454)	(72.45)	Total Comprehensive Income
Laba Bersih per Saham					Income per Share
Dasar (Rupiah penuh)	**7.44**	6.42	1.02	15.89	Basic (full Rupiah)
Dilusian (Rupiah penuh)	**7.44**	6.42	1.02	15.89	Diluted (full Rupiah)

Pendapatan Bunga

Pada tahun 2024, Bank Victoria membukukan pendapatan bunga sebesar Rp2,08 triliun, meningkat sebesar 13,06% dibandingkan tahun 2023 yang tercatat sebesar Rp1,84 triliun. Peningkatan ini terutama berasal dari pendapatan bunga atas pinjaman yang diberikan yang meningkat sebesar 12,63% dan pendapatan bunga dari efek-efek yang tumbuh sebesar 15,29%.

Beban Bunga

Beban bunga Bank Victoria per 31 Desember 2024 tercatat sebesar Rp1,53 triliun, meningkat 21,47% dibandingkan tahun sebelumnya sebesar Rp1,26 triliun. Peningkatan ini terutama disebabkan oleh kenaikan beban bunga simpanan dana pihak ketiga, khususnya dari produk deposito yang tumbuh sebesar 16,70%.

Pendapatan Bunga – Bersih

Pendapatan bunga – bersih pada tahun 2024 tercatat sebesar Rp548,60 miliar, menurun 5,21% dibandingkan tahun 2023 yang sebesar Rp578,73 miliar. Penurunan ini dipengaruhi oleh peningkatan beban bunga yang cukup signifikan sebesar 21,47%.

Pendapatan Operasional Lainnya

Pada akhir tahun 2024, Bank membukukan pendapatan operasional lainnya sebesar Rp365,74 miliar, meningkat 44,35% dibandingkan dengan tahun sebelumnya yang tercatat sebesar Rp253,37 miliar. Peningkatan ini terutama berasal dari pos pendapatan lain-lain - bersih yang tumbuh sebesar 60,69% serta dari pendapatan investasi reksadana yang meningkat sebesar 63,62%.

Beban Operasional Lainnya

Pada tahun 2024, Bank mencatatkan beban operasional lainnya sebesar Rp621,37 miliar, menurun 5,57% dari tahun sebelumnya sebesar Rp658,02 miliar. Penurunan ini terutama berasal dari penyisihan kerugian penurunan nilai aset keuangan yang menurun sebesar 16,69%.

Laba Operasional

Laba operasional Bank pada tahun 2024 tercatat sebesar Rp292,97 miliar, meningkat 68,30% dibandingkan tahun 2023 sebesar Rp174,07 miliar. Peningkatan ini ditopang oleh kenaikan pendapatan operasional lainnya sebesar 44,35% serta efisiensi beban operasional lainnya.

Interest Income

In 2024, Bank Victoria recorded interest income of Rp2.08 trillion, an increase of 13.06% compared to Rp1.84 trillion in 2023. This increase mainly came from interest income on loans which increased by 12.63% and interest income from marketable securities which grew by 15.29%.

Interest Expense

Bank Victoria's interest expense as of 31 December 2024 was recorded at Rp1.53 trillion, an increase of 21.47% compared to that of the previous year of Rp1.26 trillion. This increase was mainly due to an increase in interest expenses on third party deposits, particularly from deposit products which grew by 16.70%.

Interest Income – Net

Net interest income in 2024 was recorded at Rp548.60 billion, a decrease of 5.21% compared to Rp578.73 billion in 2023. This decrease was influenced by a significant increase in interest expense of 21.47%.

Other Operating Income

At the end of 2024, the Bank recorded other operating income of Rp365.74 billion, an increase of 44.35% compared to that of the previous year of Rp253.37 billion. This increase mainly came from other net income which grew by 60.69% and from mutual fund investment income which increased by 63.62%.

Other Operating Expenses

In 2024, the Bank recorded other operating expenses of Rp621.37 billion, decreased 5.57% from that of the previous year of Rp658.02 billion. This decrease mainly due to the provision for impairment losses on financial assets which decreased by 16.69%.

Profit from Operations

The Bank's profit from operations in 2024 was recorded at Rp292.97 billion, an increase of 68.30% compared to Rp174.07 billion in 2023. This increase was supported by an increase in other operating income of 44.35% and efficiency in other operating expenses.

Beban Non-Operasional – Bersih

Pada tahun 2024, beban non operasional – bersih meningkat signifikan sebesar 224,04%, dari Rp44,54 miliar pada tahun 2023 menjadi Rp144,31 miliar. Peningkatan ini terutama disebabkan oleh kenaikan rugi penjualan AYDA yang mencapai 165,30%.

Laba Sebelum Beban Pajak Penghasilan

Laba sebelum beban pajak penghasilan pada tahun 2024 tercatat sebesar Rp148,66 miliar, meningkat 14,76% dibandingkan tahun sebelumnya sebesar Rp129,54 miliar. Kenaikan ini selaras dengan peningkatan laba operasional Bank sepanjang tahun 2024.

Beban Pajak Penghasilan – Bersih

Pada tahun 2024, beban pajak penghasilan – bersih Bank Victoria tercatat sebesar Rp30,80 miliar, meningkat 11,11% dibandingkan tahun 2023 yang sebesar Rp27,72 miliar. Peningkatan ini berasal dari kenaikan beban pajak tangguhan.

Laba Bersih Tahun Berjalan

Laba tahun berjalan pada 2024 mencapai Rp117,86 miliar, meningkat 15,76% dibandingkan tahun sebelumnya sebesar Rp101,82 miliar. Kenaikan laba ini sejalan dengan pertumbuhan laba sebelum pajak sepanjang tahun 2024.

Penghasilan (Rugi) Komprehensif Lain, Setelah Pajak Penghasilan

Per 31 Desember 2024, Bank mencatat rugi komprehensif lain setelah pajak penghasilan sebesar Rp83,09 miliar, berbalik dari penghasilan komprehensif sebesar Rp24,41 miliar pada tahun 2023. Perubahan signifikan ini terutama disebabkan oleh munculnya rugi dari surplus revaluasi aset tetap – bersih sebesar Rp66,01 miliar dan penurunan nilai pengukuran kembali atas liabilitas imbalan kerja.

Jumlah Penghasilan Komprehensif

Sebagai hasilnya, jumlah penghasilan komprehensif Bank pada tahun 2024 tercatat sebesar Rp34,77 miliar, menurun 72,45% dibandingkan dengan tahun sebelumnya yang sebesar Rp126,22 miliar.

Non-Operating Expenses - Net

In 2024, the non-operating expenses - net increased significantly by 224.04%, from Rp44.54 billion in 2023 to Rp144.31 billion. This increase was mainly due to an increase in loss on sales of AYDA which reached 165.30%.

Profit Before Income Tax Expense

Profit before income tax expense in 2024 was recorded at Rp148.66 billion, an increase of 14.76% compared to Rp129.54 billion in the previous year of. This increase was in line with the increase in the Bank's operating profit throughout 2024.

Income Tax Expense – Net

In 2024, Bank Victoria's net income tax expense was recorded at Rp30.80 billion, an increase of 11.11% compared to Rp27.72 billion in 2023. This increase came from an increase in deferred tax expense.

Profit for the Year

Profit for the year in 2024 reached Rp117.86 billion, an increase of 15.76% compared to Rp101.82 billion in the previous year. This increase in profit was in line with the growth in profit before tax throughout 2024.

Other Comprehensive Income (Loss), Net of Income Tax

As of 31 December 2024, the Bank recorded other comprehensive loss after income tax of Rp83.09 billion, reversing from comprehensive income of Rp24.41 billion in 2023. This significant change was mainly due to the loss from revaluation surplus of fixed assets - net of Rp66.01 billion and a decrease in the remeasurements on employee benefit liabilities.

Total Comprehensive Income

As a result, the Bank's total comprehensive income in 2024 was recorded at Rp34.77 billion, decreased by 72.45% compared to Rp126.22 billion in the previous year.

Laporan Arus Kas
Statements of Cash Flows

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

Uraian	2024	2023	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
Arus Kas Bersih (Digunakan untuk)/ Diperoleh dari Aktivitas Operasi	**(942,316)**	1,279,308	(2,221,625)	(173.66)	Cash Flow (Used in)/Provided from Operating Activities
Arus Kas Bersih Digunakan untuk Aktivitas Investasi	**(1,193,957)**	(1,413,275)	(219,318)	(15.52)	Net Cash Flow used in Investing Activities
Arus Kas Bersih Diperoleh dari Aktivitas Pendanaan	**937,081**	287,343	649,738	226.12	Net Cash Flow provided from Financing Activities
Kenaikan Bersih Kas dan Setara Kas	**(1,199,193)**	153,376	(1,352,569)	(881.86)	Net Increase on Cash and Cash Equivalents
Kas dan Setara Kas pada Awal Tahun	**2,798,564**	2,645,188	153,376	5.80	Cash and Cash Equivalents at Beginning of the Year
Kas dan Setara Kas pada Akhir Tahun	**1,599,372**	2,798,564	(1,199,193)	(42.85)	Cash and Cash Equivalents at End of the Year

Arus Kas Bersih (Digunakan untuk)/Diperoleh dari Aktivitas Operasi
Pada akhir tahun 2024, Bank mencatatkan arus kas bersih yang digunakan untuk aktivitas operasi sebesar Rp942,32 miliar. Angka ini menunjukkan pembalikan dari tahun sebelumnya, di mana Bank masih mencatat arus kas bersih yang diperoleh dari aktivitas operasi sebesar Rp1,28 triliun. Perubahan tersebut terutama dipengaruhi oleh penurunan signifikan dalam simpanan nasabah sebesar 70,47%.

Arus Kas Bersih Digunakan untuk Aktivitas Investasi
Pada tahun 2024, arus kas bersih yang digunakan untuk aktivitas investasi tercatat sebesar Rp1,19 triliun, menurun 15,52% dibandingkan tahun sebelumnya yang sebesar Rp1,41 triliun. Penurunan ini utamanya disebabkan oleh menurunnya aktivitas pembelian efek-efek yang lebih rendah dibanding tahun lalu, serta berkurangnya hasil penjualan aset tetap.

Arus Kas Bersih Diperoleh dari Aktivitas Pendanaan
Sepanjang tahun 2024, arus kas bersih yang diperoleh dari aktivitas pendanaan mencapai Rp937,08 miliar, meningkat 226,12% dibandingkan tahun sebelumnya yang sebesar Rp287,34 miliar. Kenaikan ini terutama berasal dari aktivitas penerbitan obligasi yang meningkat dua kali lipat dari Rp500 miliar pada tahun 2023 menjadi Rp1 triliun pada tahun 2024.

Cash Flow (Used in)/Provided from Operating Activities
At the end of 2024, the Bank recorded net cash flow used for operating activities of Rp942.32 billion. This figure shows a reversal from the previous year, in which the Bank still recorded net cash flow obtained from operating activities of Rp1.28 trillion. This change was mainly influenced by a significant decrease in customer deposits of 70.47%.

Net Cash Flow used in Investing Activities
In 2024, net cash flow used for investing activities was recorded at Rp1.19 trillion, decreased by 15.52% compared to the previous year of Rp1.41 trillion. This decrease was mainly due to a decrease in activities of purchase of marketable securities which were lower than last year, as well as a decrease in proceeds from sale of fixed assets.

Net Cash Flow provided from Financing Activities
Throughout 2024, net cash flow provided from financing activities reached Rp937.08 billion, an increase of 226.12% compared to Rp287.34 billion in the previous year. This increase mainly came from bonds issuance activities which doubled from Rp500 billion in 2023 to Rp1 trillion in 2024.

Rasio Keuangan Penting
Significant Financial Ratios

Uraian	2024	2023	Description
Rasio Kinerja **Performance Ratio**			
Kewajiban Penyediaan Modal Minimum (KPMM) untuk Risiko Kredit, Operasional, dan Pasar	**21.53**	19.95	Capital Adequacy Ratio (CAR) for Credit, Operational, and Market Risks
Aset Produktif Bermasalah dan Aset Non-Produktif Bermasalah Terhadap Total Aset Produktif dan Non-Produktif	**3.04**	3.91	Non-Performing Earning Assets and Non-Performing Non-Earning Assets to Total Earning Assets and Non-Earning Assets
Aset Produktif Bermasalah Terhadap Total Aset Produktif	**2.35**	2.79	Non-Performing Earning Assets to Total Earning Assets
Cadangan Kerugian Penurunan Nilai (CKPN) Aset Keuangan Terhadap Aset Produktif	**1.57**	2.19	Allowance for Impairment Losses (CKPN) of Financial Assets to Earning Assets
NPL Bruto	**3.27**	3.99	Gross NPL
NPL Neto	**2.36**	3.24	Net NPL
Return on Asset (ROA)	**0.51**	0.48	Return on Asset (ROA)
Return on Equity (ROE)	**3.41**	3.12	Return on Equity (ROE)
Net Interest Margin (NIM)	**2.22**	2.58	Net Interest Margin (NIM)
Beban Operasional Terhadap Pendapatan Operasional (BOPO)	**88.00**	91.67	Operating Expenses to Operating Income (BOPO)
Cost to Income Ratio (CIR)	**55.35**	46.15	Cost to Income Ratio (CIR)
Loan to Deposit Ratio (LDR)	**88.12**	83.06	Loan to Deposit Ratio (LDR)
LR secara Individual	**11.04**	10.34	Individual LR
Rasio Pinjaman terhadap Pendanaan (LFR)	**86.27**	81.93	Loan to Funding Ratio (LFR)
Rasio Dana Murah (CASA)	**26.58**	23.93	Low-Cost Funds Ratio (CASA)
Rasio Kepatuhan **Compliance Ratios**			
Persentase Pelanggaran BMPK			Percentage of LLL Violation
Pihak Terkait	**0.00**	0.00	Related Parties
Pihak Tidak Terkait	**0.00**	0.00	Non-Related Parties

Uraian	2024	2023	Description
Persentase Pelampauan BMPK			Percentage of LLL Excess
Pihak Terkait	**0.00**	0.00	Related Parties
Pihak Tidak Terkait	**0.00**	0.00	Non-Related Parties
Giro Wajib Minimum (GWM) Bank Umum Konvensional			Minimum Statutory Reserve (GWM) of Commercial Bank - Conventional
Rupiah			Rupiah
GWM Wajib Minimum*	**6.67**	7.32	Minimum Statutory GMW*
Penyangga Likuiditas Makroprudensial**	**21.78**	23.73	Macroprudential Liquidity Buffer**
GWM Rasio Intermediasi Makroprudensial***	**4.76**	(1.01)	GMW Macroprudential Intermediation Ratio***
Valuta Asing	**4.05**	4.05	Foreign Currencies
Posisi Devisa Neto (PDN) secara Keseluruhan	**0.21**	0.39	Overall Net Open Position (PDN)

* Sebelumnya Giro Wajib Minimum Primer / Previously Primary Minimum Statutory Reserves.
** Sebelumnya Giro Wajib Minimum Sekunder / Previously Secondary Minimum Statutory Reserves.
*** Sebelumnya Giro Wajib Minimum LFR / Previously Loan to Funding Ratio Minimum Statutory Reserve.

Kemampuan Membayar Utang dan Kolektibilitas Piutang

Bank mengukur kemampuannya dalam memenuhi seluruh kewajiban, baik jangka pendek maupun jangka panjang, dengan menggunakan rasio likuiditas, rasio solvabilitas, posisi devisa, dan rasio rentabilitas. Bank senantiasa memantau rasio-rasio tersebut sebagai parameter untuk mengukur kemampuannya dalam menyediakan cadangan likuiditas yang memadai. Pada tahun 2024, kinerja rasio keuangan Bank Viictoria diuraikan sebagai berikut:

1. **Rasio Likuiditas**
   Kemampuan Bank Victoria dalam membayar utang jangka pendek dianalisis melalui perhitungan rasio likuiditas, yaitu rasio pinjaman terhadap dana pihak ketiga (*loan to deposit ratio*/LDR). LDR Bank Victoria pada tahun 2024 sebesar 88,12%, meningkat dibandingkan tahun 2023 yang tercatat sebesar 83,06%. Perolehan tersebut mencerminkan kondisi likuiditas Bank Victoria yang berada pada posisi optimal dan sehat, serta tetap berada dalam batas ketentuan yang ditetapkan oleh Bank Indonesia.

2. **Rasio Solvabilitas**
   Rasio solvabilitas diukur melalui rasio KPMM untuk memastikan terpenuhinya risiko kredit, operasional, dan pasar. Nilai rasio KPMM Bank Victoria pada akhir tahun 2024 sebesar 21,53%, lebih tinggi dibandingkan tahun 2023 yang tercatat sebesar 19,95%. Berdasarkan hal tersebut, permodalan Bank masih berada dalam kondisi yang cukup baik karena nilai rasio KPPM masih berada di atas ketentuan yang ditetapkan.

3. **Rasio Kepatuhan**
   Pada akhir tahun 2024, rasio GWM primer Bank (konvensional) tercatat sebesar 6,67% untuk mata uang Rupiah dan 4,05% untuk valuta asing. Sementara itu, rasio GWM RIM sebesar 4,76% dan rasio GWM PLM sebesar 21,78%. Seluruh rasio tersebut menunjukkan bahwa Bank telah memenuhi ketentuan yang berlaku sesuai peraturan Bank Indonesia per 31 Desember 2024 dan 2023.

Solvency and Receivables Collectability

The Bank measures its ability to meet all obligations, both short-term and long term, by using liquidity ratio, solvency ratio, foreign exchange position, and profitability ratio. The Bank always monitors these ratios as parameters in measuring its ability to provide adequate liquidity reserves. In 2024, Bank Victoria's financial ratio performance is outlined as follows:

1. **Liquidity Ratio**
   Bank Victoria's ability to pay short-term debt is analyzed through the calculation of liquidity ratio, namely loan to deposit ratio loan to deposit ratio (LDR). Bank Victoria's LDR in 2024 was 88.12%, an increase compared to 2023 which was recorded at 83.06%. This achievement reflects Bank Victoria's liquidity conditions which are in an optimal and healthy position, and remain within the limits set by Bank Indonesia.

2. **Solvency Ratio**
   Solvency ratio is measured through CAR ratio to ensure that credit, operational, and market risks are fulfilled. The value of Bank Victoria's CAR ratio at the end of 2024 was 21.53%, higher than that in 2023 of 19.95%. Based on such matter, the Bank's capital is still in fairly good condition as the CAR ratio value is still above the stipulated provisions.

3. **Compliance Ratio**
   At the end of 2024, the Bank's primary GWM ratio (conventional) was recorded at 6.67% for Rupiah and 4.05% for foreign currency. Meanwhile, the GWM RIM ratio was 4.76% and the GWM PLM ratio was 21.78%. All of these ratios indicated that the Bank complied with the applicable provisions according to Bank Indonesia regulations as of 31 December 2024 and 2023.

4. Rasio Rentabilitas

Bank mengukur efektivitas dalam menghasilkan laba melalui beberapa rasio rentabilitas, seperti *Return on Asset* (ROA), *Return on Equity* (ROE), *Net Interest Margin* (NIM), dan rasio Beban Operasional terhadap Pendapatan Operasional (BOPO). Pada tahun 2024, pencapaian masing-masing rasio tersebut adalah ROA sebesar 0,51%, ROE sebesar 3,41%, NIM sebesar 2,22%, dan BOPO sebesar 88,00%. Sementara itu, pada tahun 2023, rasio ROA, ROE, NIM, dan BOPO masing-masing tercatat sebesar 0,48%, 3,12%, 2,58%, dan 91,67%.

5. Kemampuan Membayar Utang dari Obligasi yang Diterbitkan

Kemampuan Bank dalam memenuhi kewajiban atas utang juga tercermin dari peringkat atas efek-efek yang diterbitkan, khususnya obligasi. Untuk menjaga kredibilitas dan mendukung kelayakan investasinya, obligasi yang diterbitkan oleh Bank Victoria secara rutin dinilai oleh lembaga pemeringkat independen. Kualitas efek tersebut sangat bergantung pada kemampuan Bank dalam membayar pokok dan kupon secara tepat waktu selama periode penerbitan. Saat ini, obligasi Bank Victoria telah dicatatkan di Bursa Efek Indonesia.

6. Kolektibilitas Piutang

Kolektibilitas Bank diukur melalui rasio NPL, yang dijaga agar tetap berada di bawah batas maksimum yang ditetapkan oleh Bank Indonesia, yaitu 5,00%. Pada akhir tahun 2024, Bank Victoria mencatatkan NPL bruto sebesar 3,27% dan NPL neto sebesar 2,36%. Angka tersebut menunjukkan perbaikan jika dibandingkan dengan tahun 2023 yang masing-masing tercatat sebesar 3,99% dan 3,24%. Berdasarkan peraturan Bank Indonesia, pinjaman yang dikelola oleh Bank diklasifikasikan berdasarkan kolektibilitasnya dalam beberapa kategori.

4. Profitability Ratio

The Bank measures its effectiveness in generating profits through several profitability ratios, such as Return on Assets (ROA), Return on Equity (ROE), Net Interest Margin (NIM), and the ratio of Operating Expenses to Operating Income (BOPO). In 2024, the achievement of each of these ratios was ROA of 0.51%, ROE of 3.41%, NIM of 2.22%, and BOPO of 88.00%. Meanwhile, in 2023, ROA, ROE, NIM, and BOPO ratios were recorded at 0.48%, 3.12%, 2.58%, and 91.67%, respectively.

5. Ability to Pay Debt from Bonds Issued

The Bank's ability to meet its debt obligations is also reflected in the ratings of the securities issued, particularly bonds. To maintain credibility and support its investment feasibility, bonds issued by Bank Victoria are regularly assessed by an independent rating agency. The quality of such securities is highly dependent on the Bank's ability to pay principal and coupons on time during the issuance period. Currently, Bank Victoria bonds are listed on the Indonesia Stock Exchange.

6. Receivables Collectability

The Bank's collectability is measured by NPL ratio, which is maintained below the maximum limit set by Bank Indonesia, which is 5.00%. At the end of 2024, Bank Victoria recorded a gross NPL of 3.27% and a net NPL of 2.36%. These figures show an improvement compared to 2023, which were recorded at 3.99% and 3.24%, respectively. Based on Bank Indonesia regulations, loans managed by the Bank are classified based on their collectability into several categories.

Uraian	2024		2023		Description
	Pokok Principal	Cadangan Allowance	Pokok Principal	Cadangan Allowance	
Lancar	**19,197,769**	**146,102**	16,853,533	(188,688)	Current
Dalam Perhatian Khusus	**688,874**	**112,644**	1,031,747	(246,323)	Special Mention
Kurang Lancar	**62,186**	**22,339**	92,773	(44,668)	Substandard
Diragukan	**5,103**	**1,387**	17,420	(4,529)	Doubtful
Macet	**605,929**	**164,494**	633,270	(90,665)	Loss
Total	**20,559,860**	**(446,966)**	**18,628,743**	**(574,872)**	**Total**

Kontribusi kepada Negara

Sebagai bentuk tanggung jawab dan kontribusi terhadap negara, Bank Victoria secara konsisten memenuhi kewajibannya sebagai wajib pajak. Informasi mengenai pembayaran pajak yang dilakukan oleh Bank selama 2 (dua) tahun terakhir disajikan dalam tabel berikut:

Contribution to the State

As a form of responsibility and contribution to the country, Bank Victoria consistently fulfills its obligations as a taxpayer. Information regarding tax payments made by the Bank throughout the last 2 (two) years is presented in the following table:

(dalam juta Rupiah / in million Rupiah)

Uraian	2024	2023	Description
PPh Pasal 4 ayat 2	**258,455**	217,418	Income Tax Article 4 (2)
PPh Pasal 21	**19,164**	19,377	Income Tax Article 21
PPh Pasal 23	**1,078**	765	Income Tax Article 23
PPh Pasal 25	**-**	-	Income Tax Article 25
PPh Pasal 26	**293**	250	Income Tax Article 26
PPN	**4,233**	7,189	VAT
Amnesti Pajak	**-**	-	Tax Amnesty
Total	**283,223**	**244,999**	**Total**

Struktur Modal dan Kebijakan Struktur Modal

Kebijakan Manajemen Atas Struktur Modal dan Dasar Pemilihannya

Bank Victoria memiliki kebijakan pengelolaan modal untuk memastikan tersedianya modal yang kuat guna mendukung strategi ekspansi usaha saat ini dan mempertahankan keberlanjutan pengembangan di masa mendatang. Selain itu, kebijakan permodalan juga ditujukan untuk memenuhi ketentuan kecukupan modal yang ditetapkan oleh regulator serta menjaga agar struktur permodalan Bank tetap efisien.

Bank secara berkala menyusun rencana permodalan berdasarkan penelaahan atas kebutuhan kecukupan modal yang dipersyaratkan, dikombinasikan dengan evaluasi terhadap perkembangan kondisi ekonomi terkini. Rencana tersebut disusun oleh Direksi sebagai bagian dari Rencana Bisnis Bank dan disetujui oleh Dewan Komisaris. Sepanjang periode pelaporan, Bank telah mematuhi seluruh ketentuan modal yang ditetapkan oleh regulator, khususnya terkait perhitungan Kewajiban Penyediaan Modal Minimum (KPMM) dan Aktiva Tertimbang Menurut Risiko (ATMR).

Rincian Struktur Modal

Perhitungan kecukupan modal Bank dilakukan sesuai ketentuan Bank Indonesia yang berlaku, dengan klasifikasi modal ke dalam dua kelompok, yaitu Modal *Tier* I dan Modal *Tier* II. Kewajiban penyediaan modal mempertimbangkan eksposur terhadap risiko kredit, risiko operasional, dan risiko pasar. Rincian struktur modal Bank Victoria per 31 Desember 2023 dan 2024 disajikan dalam tabel berikut:

Capital Structure and Capital Structure Policy

Management Policy on Capital Structure and Basis of Selection

Bank Victoria has a capital management policy to ensure the availability of strong capital to support current business expansion strategy and maintain sustainable development in the future. In addition, the capital policy is also aimed at meeting the capital adequacy requirements set by the regulator and maintaining the Bank's capital structure to remain efficient.

The Bank periodically prepares a capital plan based on a review of the required capital adequacy requirements, combined with an evaluation of current economic developments. The plan is prepared by the Board of Directors as part of the Bank's Business Plan and approved by the Board of Commissioners. Throughout the reporting period, the Bank has complied with all capital requirements set by the regulator, particularly regarding the calculation of the Capital Adequate Ratio (CAR) and Risk Weighted Assets (RWA).

Details of Capital Structure

The Bank's capital adequacy is calculated in accordance with the applicable Bank Indonesia regulations, with capital classification into two groups, namely Tier I Capital and Tier II Capital. The capital adequacy ratio considers exposure to credit risk, operational risk, and market risk. Details of Bank Victoria's capital structure as of 31 December 2023 and 2024 are presented in the following table:

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

Uraian	2024	2023	Description
Modal Inti (*Tier* I)	**3,584,008**	3,287,238	Core Capital (Tier I)
Modal Pelengkap (*Tier* II)	**833,933**	532,853	Supplementary Capital (Tier II)
Total Modal	**4,417,941**	**3,820,092**	**Total Capital**

Uraian	2024	2023	Description
ATMR untuk Risiko Kredit	**18,182,056**	16,999,049	RWA for Credit Risk
ATMR untuk Risiko Operasional	**1,555,658**	1,466,732	RWA for Operational Risk
ATMR untuk Risiko Pasar	**785,592**	685,119	RWA for Market Risk
Rasio KPMM untuk Risiko Kredit dan Risiko Operasional (%)	**22.38**	20.69	CAR Ratio with Credit and Operational Ratio (%)
Rasio KPMM untuk Risiko Kredit, Risiko Operasional, dan Risiko Pasar (%)	**21.53**	19.95	CAR Ratio with Credit, Operational, and Market Ratio (%)
Rasio KPMM yang Diwajibkan (%)	**9.00**	8.00	CAR Ratio Required (%)

Ikatan Material Terkait Investasi Barang Modal

Sepanjang tahun 2024, Bank Victoria tidak memiliki ikatan material dengan pihak mana pun yang berkaitan dengan investasi dalam barang modal.

Material Commitments Related to Capital Goods Investment

Throughout 2024, Bank Victoria did not have any material commitments with any party related to capital goods investment.

Realisasi Investasi Barang Modal

Realisasi investasi barang modal yang dilakukan Bank Victoria meliputi berbagai jenis aset tetap, seperti bangunan, kendaraan bermotor, mesin dan peralatan, perlengkapan kantor, serta aset tetap dalam proses pembangunan. Investasi ini ditujukan untuk mendukung kelancaran kegiatan operasional, meningkatkan kualitas layanan kepada nasabah, serta memperkuat infrastruktur dan sarana pendukung guna menunjang pertumbuhan usaha Bank secara berkelanjutan. Rincian investasi barang modal yang dilakukan Bank Victoria selama 2 (dua) tahun terakhir diuraikan sebagai berikut:

Realization of Capital Goods Investment

The realization of capital goods investment carried out by Bank Victoria includes various types of fixed assets, such as buildings, vehicles, machinery and equipment, office furniture, and fixed assets under construction. This investment is aimed at supporting the smooth running of operational activities, improving service quality to customers, and strengthening infrastructure and support facilities to support the Bank's sustainable business growth. Details of capital goods investment carried out by Bank Victoria throughout the past 2 (two) years are outlined as follows:

(dalam juta Rupiah / in million Rupiah)

Uraian	2024	2023	Description
Bangunan	**2,673**	1,613	Buildings
Kendaraan Bermotor	**2,885**	2,099	Vehicles
Mesin-Mesin dan Peralatan	**13,870**	12,080	Machinery and Equipment
Perlengkapan dan Perabotan Kantor	**373**	399	Office Furniture and Equipment
Aset Tetap dalam Proses Pembangunan	**-**	5	Assets under Constructions
Total	**19,802**	**16,196**	**Total**

Derivatif dan Fasilitas Lindung Nilai

Pada akhir tahun 2023 dan 2024, Bank Victoria tidak memiliki aktivitas atau transaksi keuangan yang berkaitan dengan instrumen derivatif maupun fasilitas lindung nilai. Oleh karena itu, tidak terdapat informasi terkait hal tersebut yang dapat disajikan dalam Laporan Tahunan ini.

Derivative and Hedging Facilities

At the end of 2023 and 2024, Bank Victoria did not have any financial activities or transactions related to derivative instruments or hedging facilities. Therefore, there is no information related to this matter that can be presented in this Annual Report.

Dampak Perubahan Tingkat Suku Bunga Terhadap Kinerja Bank Tahun 2024

Perubahan tingkat suku bunga sepanjang tahun 2024 memberikan pengaruh terhadap kinerja industri perbankan, termasuk Bank Victoria. Penyesuaian suku bunga acuan Bank Indonesia berdampak pada tingkat suku bunga kredit yang ditetapkan oleh perbankan. Sepanjang tahun 2024, Bank Indonesia beberapa kali melakukan penyesuaian suku bunga acuan atau *BI 7-Day Reverse Repo Rate* (BI7DRR), yang meningkat dari 6,00% menjadi 6,25% pada April 2024, kemudian turun kembali menjadi 6,00% pada September 2024. Hingga akhir tahun, tepatnya pada 17–18 Desember 2024, suku bunga acuan tetap dipertahankan di level 6,00%. Keputusan ini mencerminkan upaya Bank Indonesia dalam menjaga stabilitas inflasi sesuai sasaran serta mendukung pertumbuhan ekonomi nasional secara berkelanjutan.

Impact of Changes of Interest Rates to Bank Performance in 2024

Interest rate changes throughout 2024 had an impact on banking industry's performance, including Bank Victoria. Adjustments to Bank Indonesia's benchmark interest rate have an impact on the credit interest rates set by banks. Throughout 2024, Bank Indonesia made several adjustments to its benchmark interest rate or BI 7-Day Reverse Repo Rate (BI7DRR), which increased from 6.00% to 6.25% in April 2024, then decreased again to 6.00% in September 2024. Until the end of the year, precisely on 17-18 December 2024, the benchmark interest rate remained at 6.00%. This decision reflects Bank Indonesia's efforts to maintain inflation stability in line with the target and support sustainable national economic growth.

Perbandingan Target dan Realisasi Tahun 2024

Dalam rangka mengevaluasi efektivitas pencapaian tujuan strategis, Bank Victoria menetapkan sejumlah indikator target yang mencakup aspek keuangan, operasional, serta rasio-rasio keuangan penting. Target tersebut ditetapkan dalam Rencana Bisnis Bank sebagai acuan untuk mengukur kinerja sepanjang tahun berjalan. Sepanjang tahun 2024, Bank telah melakukan pemantauan dan penyesuaian terhadap pelaksanaan strategi guna mencapai target yang telah ditetapkan. Perbandingan antara target dan realisasi selama tahun buku 2024 disajikan lebih lanjut dalam tabel berikut:

Comparison of Target and Realization in 2024

To evaluate the effectiveness of achieving strategic objectives, Bank Victoria sets a number of target indicators covering financial, operational, and important financial ratios. The target is set in the Bank's Business Plan as a reference for measuring performance throughout the current year. Throughout 2024, the Bank monitored and adjusted the strategies implementation in order to achieve the targets set. The comparison between target and the realization throughout the 2024 fiscal year is further presented in the following table:

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

Uraian	Target Rencana Bisnis Bank 2024 Target of Bank Business Plan 2024	Realisasi 2024 Realization in 2024	Pencapaian Achievement (%)	Description
Kinerja Keuangan **Financial Performance**				
Total Aset	30,000	**31,046**	103.49	Total Assets
Total Liabilitas	26,081	**27,113**	103.96	Total Liabilities
Total Ekuitas	3,919	**3,933**	100.36	Total Equity
Pendapatan Bunga – Bersih	533	**549**	102.90	Interest Income - Net
Pendapatan (Beban) Operasional selain Bunga – Bersih	(349)	**(256)**	73.35	Operating Income (Expenses) other than Interest – Net
Laba Operasional	184	**293**	159.24	Profit from Operations
Laba Bersih Tahun Berjalan	106	**118**	111.54	Profit for the Year
Rasio Keuangan (dalam %) **Financial Ratios (in %)**				
KPMM dengan Memperhitungkan Risiko Kredit dan Operasional	23.44	**22.38**	95.48	CAR by Calculating Credit and Operational Risks
KPMM dengan Memperhitungkan Risiko Kredit, Operasional, dan Pasar	22.09	**21.53**	97.46	CAR by Calculating Credit, Operational, and Market Risks
Net Interest Margin (NIM)	2.11	**2.22**	104.74	Net Interest Margin (NIM)
Loan to Deposit Ratio (LDR)	86.99	**88.12**	101.30	Loan to Deposit Ratio (LDR)

Uraian	Target Rencana Bisnis Bank 2024 Target of Bank Business Plan 2024	Realisasi 2024 Realization in 2024	Pencapaian Achievement (%)	Description
Return on Asset (ROA)	0.46	**0.51**	110.87	Return on Asset (ROA)
Return on Equity (ROE)	3.11	**3.41**	109.65	Return on Equity (ROE)
NPL Bruto	3.48	**3.27**	93.97	Gross NPL
Beban Operasional Terhadap Pendapatan Operasional (BOPO)	91.96	**88.00**	95.69	Operating Expenses to Operating Income (BOPO)
Kinerja Operasional **Operational Performance**				
Produk Simpanan				**Deposits Products**
Tabungan	3,001	**3,287**	109.53	Savings Deposits
Giro	3,449	**2,915**	84.52	Demand Deposits
Deposito Berjangka	15,795	**16,702**	105.74	Time Deposits
Negotiable Certificate Deposits	789	**429**	54.37	Negotiable Certificate Deposits
Total Produk Simpanan	**23,034**	**23,332**	**101.29**	**Total Deposits Products**
Produk Pinjaman				**Loan Products**
Pinjaman Tetap	10,432	**10,086**	96.68	Fixed Loans
Pinjaman Konsumen	177	**167**	94.35	Consumer Loans
Pinjaman Rekening Koran	2,013	**2,122**	105.41	Overdraft Loans
Pinjaman Tetap dengan Angsuran	7,382	**8,110**	109.86	Fixed Loans with Installments
Pinjaman Serba Guna	33	**74**	224.24	Multi Purpose Loans
Total Produk Pinjaman	**20,037**	**20,560**	**102.61**	**Total Loan Products**

Proyeksi Tahun 2025

Penetapan proyeksi kinerja Bank untuk tahun 2025 menjadi bagian penting dalam mendukung arah kebijakan strategis, manajemen risiko, serta pengambilan keputusan yang lebih terarah. Proyeksi ini tidak hanya menjadi pedoman bagi manajemen, tetapi juga menjadi acuan bagi regulator dan para pemangku kepentingan dalam menilai prospek pertumbuhan dan kesiapan Bank dalam menghadapi dinamika ekonomi ke depan. Bank Victoria telah menyusun sejumlah target kinerja untuk dicapai pada tahun 2025, yang dijabarkan secara lebih lanjut dalam penjelasan berikut:

Projections for 2025

Determining the Bank's performance projection for 2025 is an important part of supporting the direction of strategic policies, risk management, and addressing more focused decision-making. This projection is not only a guideline for management, but also a reference for regulators and stakeholders in assessing the Bank's growth prospects and readiness to face future economic dynamics. Bank Victoria has prepared a number of performance targets to be achieved in 2025, which are further explained in the following explanation:

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

Uraian	Proyeksi Rencana Bisnis Bank 2025 Bank Business Plan Projection 2025	Description
Ringkasan Neraca **Summary of Balance Sheet**		
Total Aset	**33,356**	**Total Assets**
Efek-Efek	**8,113**	Marketable Securities
Kredit yang Diberikan	**21,540**	Loans
Agunan yang Diambil Alih	**100**	Foreclosed Assets
Komponen Aset Lainnya	**3,603**	Other Components of Assets

Uraian	Proyeksi Rencana Bisnis Bank 2025 Bank Business Plan Projection 2025	Description
Total Liabilitas	**29,258**	**Total Liabilities**
Total Dana Pihak Ketiga	**25,041**	Total Third-Party Funds
Giro	**3,531**	Demand Deposits
Tabungan	**3,982**	Savings Deposits
Deposito	**17,529**	Time Deposits
Efek-Efek yang Diterbitkan	**3,443**	Securities Issued
Komponen Liabilitas Lainnya	**774**	Other Components of Liability
Total Ekuitas	**4,097**	**Total Equity**
Modal Disetor dan Tambahan Modal Disetor	**2,253**	Paid-In Capital and Additional Paid-In Capital
Akumulasi Laba/(Rugi)	**1,216**	Accumulated Profit/(Loss)
Komponen Ekuitas Lainnya	**629**	Other Equity Components
Ringkasan Laba/(Rugi) **Summary of Profit/(Loss)**		
Pendapatan dan Beban Bunga – Bersih	**633**	Interest Income and Expenses – Net
Pendapatan/(Beban) Operasional Selain Bunga –Bersih	**(379)**	Operating Income/(Expenses) Other than Interest – Net
Laba/(Rugi) Operasional	**254**	Profit/(Loss) from Operations
Pendapatan/(Beban) Non-Operasional – Bersih	**(62)**	Non-Operating Income/(Expenses) - Net
Laba/(Rugi) Sebelum Beban Pajak Penghasilan	**193**	Profit/(Loss) before Income Tax Expense
Beban Pajak Penghasilan – Bersih	**(42)**	Income Tax Expense – Net
Laba/(Rugi) Setelah Beban Pajak Penghasilan	**151**	Profit/(Loss) Net of Income Tax Expense
Kebijakan Dividen **Dividend Policy**		
Dividen yang Dibagikan	**N/A**	Distributed Dividends
Struktur Modal **Capital Structure**		
KPMM untuk Risiko Kredit, Risiko Operasional, dan Risiko Pasar (%)	**23.62**	CAR for Credit Risk, Operational Risk, and Market Risk (%)
Total Kantor **Total Offices**		
Kantor Cabang	**14**	Branches
Kantor Cabang Pembantu	**22**	Sub-Branches
Jaringan Kantor Lain (Kantor Kas, Payment Point, dan Lainnya)	**2**	Other Office Network (Cash Office, Payment Point, and Others)

Asumsi dalam Menyusun Proyeksi

Dalam menyusun proyeksi keuangan untuk tahun 2025, Bank Victoria memperhatikan keseimbangan antara kapasitas internal Bank dan berbagai faktor eksternal yang relevan. Proyeksi ini disusun dengan mempertimbangkan kondisi ekonomi terkini dan dinamika yang diperkirakan akan terjadi di masa mendatang, termasuk pengaruh dari perkembangan ekonomi global serta kebijakan fiskal dan moneter nasional. Asumsi makro dan mikro yang digunakan mengacu pada indikator dalam Anggaran Pendapatan dan Belanja Negara (APBN) 2025 serta informasi dari siaran pers resmi Bank Indonesia. Seluruh pertimbangan tersebut menjadi dasar dalam penyusunan Rencana Bisnis Bank untuk periode 2025–2027.

Assumptions in Preparing Projections

In preparing financial projections for 2025, Bank Victoria pays attention to the balance between the Bank's internal capacity and various relevant external factors. This projection is prepared by considering current economic conditions and dynamics expected to occur in the future, including the influence of global economic developments and national fiscal and monetary policies. The macro and micro assumptions used refer to indicators in the 2025 State Budget (APBN) and information from Bank Indonesia's official press releases. All of these considerations are the basis for preparing the Bank's Business Plan for the period 2025–2027.

(dalam % / in %)

Uraian	Proyeksi Projections			Description
	2025	2026	2027	
Asumsi Makro **Macro Assumptions**				
Pertumbuhan PDB	5.00-5.20	5.00-5.20	5.00-5.20	GDP Growth
Inflasi	2.50	2.80	3.00	Inflation
Kurs IDR/USD	16,000	16,500	16,800	Exchange Rate of IDR/USD
BI 7 *Days Rate*	5.75-6.00	5.75-6.00	5.75-6.00	BI 7 *Days Rate*
Asumsi Mikro **Micro Assumptions**				
Pertumbuhan Kredit	11-13	11-13	11-13	Loan Growth
Pertumbuhan Dana Pihak Ketiga	9-10	9-10	9-10	Third-Party Funds Growth
Tingkat Bunga Simpanan Tabungan	3.00-8.00	3.00-7.75	3.00-7.75	Interest Rate on Savings Deposits
Tingkat Bunga Kredit Ritel Komersil	10.50-13.50	10.50-13.50	10.50-13.50	Commercial Retail Loan Interest Rates

Strategi Pengembangan Bisnis ke Depan

Sebagai upaya untuk memastikan Bank dapat mencapai kinerja yang optimal, berkelanjutan, dan responsif terhadap perubahan pasar serta kebutuhan nasabah, Bank Victoria telah merancang strategi dan rencana pengembangan bisnis yang mengacu pada arah kebijakan Bank. Strategi ini disusun sejalan dengan penetapan tema Rencana Bisnis Bank 2025 yaitu "*Sustainable Growth Through Digitalization and Strong Governance*" yang dijabarkan sebagai berikut:

1. Menjaga dan memperkuat penerapan prinsip-prinsip GCG secara konsisten yang selaras dengan prinsip manajemen risiko dan kepatuhan terhadap regulasi (*compliance*);
2. Menjaga dan memelihara permodalan di level yang kuat dan memadai sebagai landasan pengembangan dan pertumbuhan skala bisnis Bank yang *prudent* dan berkelanjutan;
3. Melanjutkan optimalisasi melalui evaluasi kinerja jaringan kantor cabang guna meningkatkan efisiensi dan produktivitas dalam rangka mencapai pertumbuhan bisnis yang berkelanjutan;
4. Melanjutkan dan meningkatkan inovasi produk serta layanan terbaik yang berfokus pada kebutuhan nasabah (*customer-centric*);
5. Melanjutkan pengembangan sistem teknologi informasi untuk mendukung efisiensi, inovasi, dan pengembangan produk, serta peningkatan kualitas layanan;
6. Mengembangkan kualitas serta meningkatkan produktivitas sumber daya manusia dan pelayanan nasabah dalam menghadapi tantangan bisnis; dan
7. Meningkatkan nilai perusahaan bagi Pemegang Saham dan pemangku kepentingan.

Future Business Development Strategies

To ensure that the Bank can achieve optimal, sustainable, and responsive performance to market changes and customer needs, Bank Victoria has designed a business development strategy and plan that refers to the Bank's policy direction. This strategy is prepared in line with the determination of the theme of the Bank's 2025 Business Plan, namely "Sustainable Growth Through Digitalization and Strong Governance" which is described as follows:

1. Maintaining and strengthening the consistent application of GCG principles, which are in line with risk management principles and regulatory compliance;
2. Maintaining and fostering capital at a strong and adequate level as a basis for prudent and sustainable development and growth of the Bank's business scale;
3. Continuing optimization through evaluating the performance of branch office network to increase its efficiency and productivity to achieve sustainable business growth;
4. Continuing and improving product innovation and the best services that focus on customer needs (customer-centric);
5. Continuing the development of information technology systems to support efficiency, innovation and product development, as well as service quality improvements;
6. Developing quality and increasing the productivity of human resources and customer service in facing business challenges; and
7. Increasing Company value for Shareholders and stakeholders.

Informasi Material Setelah Tanggal Laporan Akuntan

Pada tanggal 15 Januari 2025, Bank Victoria bersama dengan Pemegang Saham Utama dan Pengendali Bank yaitu PT Victoria Investama Tbk melakukan penandatanganan Perjanjian Jual Beli Saham Bersyarat (PJBSB) dengan PT Bank Tabungan Negara (Persero) Tbk sehubungan dengan rencana pengambilalihan yang akan dilakukan oleh PT Bank Tabungan Negara (Persero) Tbk atas Entitas Asosiasi yaitu PT Bank Victoria Syariah, di mana PT Bank Tabungan Negara (Persero) Tbk akan melakukan pembelian saham yang dimiliki oleh Bank Victoria dan PT Victoria Investama Tbk sesuai dengan persyaratan dan ketentuan dalam PJBSB tersebut. Sampai dengan tanggal laporan akuntan, proses pengambilalihan PT Bank Victoria Syariah masih dalam proses.

Material Information Subsequent to the Accountant's Reporting Date

On 15 January 2025, Bank Victoria together with the Bank's Main and Controlling Shareholder, namely PT Victoria Investama Tbk, signed a Conditional Share Sale and Purchase Agreement (PJBSB) with PT Bank Tabungan Negara (Persero) Tbk in connection with the takeover plan to be carried out by PT Bank Tabungan Negara (Persero) Tbk of the Associated Entity, namely PT Bank Victoria Syariah, in which PT Bank Tabungan Negara (Persero) Tbk will purchase shares owned by Bank Victoria and PT Victoria Investama Tbk in accordance with the terms and conditions in PJBSB. As of the date of the accountant's report, the takeover process of PT Bank Victoria Syariah was still in process.

Kebijakan Dividen

Bank Victoria menetapkan kebijakan pembagian dividen berdasarkan ketentuan yang tercantum dalam Anggaran Dasar Bank, di mana dividen hanya dapat dibagikan apabila Bank memiliki saldo laba yang positif. Pembagian dividen tersebut harus memperoleh persetujuan RUPS serta tetap mengacu pada ketentuan perundang-undangan yang berlaku. Penetapan dividen juga mempertimbangkan kondisi keuangan, tingkat kesehatan Bank, dan seluruh regulasi yang relevan di sektor perbankan.

Sepanjang tahun 2024 dan 2023, Bank Victoria tidak melakukan pembagian dividen tunai kepada para Pemegang Saham.

Dividend Policy

Bank Victoria determines a dividend distribution policy based on the provisions set out in the Bank's Articles of Association,in which dividends can only be distributed if the Bank has a positive profit balance. The distribution of dividends must obtain the GMS approval and still refers to the provisions of applicable laws and regulations. The determination of dividends also considers the financial condition, sound rating of the Bank, and all relevant regulations in banking sector.

Throughout 2024 and 2023, Bank Victoria did not distribute any cash dividends to Shareholders.

Realisasi Penggunaan Dana Hasil Penawaran Umum

Informasi mengenai realisasi penggunaan dana hasil penawaran umum yang dilakukan oleh Bank Victoria sepanjang tahun 2024 disampaikan sebagai bentuk transparansi kepada Pemegang Saham dan pemangku kepentingan. Rincian penggunaan dana tersebut diungkapkan dalam penjabaran berikut:

Realization of the Use of Public Offering Proceeds

Information regarding the realization of the use of public offering proceeds conducted by Bank Victoria throughout 2024 is submitted as a form of transparency to Shareholders and stakeholders. Details of the use of such funds are disclosed in the following description:

Jenis Penawaran Umum Type of Public Offering	Tanggal Efektif Effective Date	Nilai Realisasi Hasil Penawaran Umum Realized Value of Public Offering Proceeds			Rencana Penggunaan Dana Plan to Use Proceeds		Realisasi Penggunaan Dana Realized Use of Proceeds		Sisa Dana Hasil Penawaran Umum Remaining Amount of Public Offering Proceeds
		Jumlah Hasil Penawaran Umum Amount of Public Offering Proceeds	Biaya Penawaran Umum Public Offering Fee	Hasil Bersih Net Proceeds	Modal Kerja dalam Rangka Pengembangan Usaha Working Capital in Business Development	Total	Modal Kerja dalam Rangka Pengembangan Usaha Working Capital in Business Development	Total	
Penawaran Umum Berkelanjutan Obligasi Berkelanjutan III Bank Victoria Tahap II Tahun 2024 Public Offering of Bank Victoria Continuing Bonds III Phase II 2024	28 Juni 2024 28 June 2024	500.000.000.000	6.445.355.661	493.554.644.339	493.554.644.339	493.554.644.339	493.554.644.339	493.554.644.339	0

Jenis Penawaran Umum Type of Public Offering	Tanggal Efektif Effective Date	Nilai Realisasi Hasil Penawaran Umum Realized Value of Public Offering Proceeds			Rencana Penggunaan Dana Plan to Use Proceeds		Realisasi Penggunaan Dana Realized Use of Proceeds		Sisa Dana Hasil Penawaran Umum Remaining Amount of Public Offering Proceeds
		Jumlah Hasil Penawaran Umum Amount of Public Offering Proceeds	Biaya Penawaran Umum Public Offering Fee	Hasil Bersih Net Proceeds	Modal Kerja dalam Rangka Pengembangan Usaha Working Capital in Business Development	Total	Modal Kerja dalam Rangka Pengembangan Usaha Working Capital in Business Development	Total	
Penawaran Umum Berkelanjutan Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap I Tahun 2024 Public Offering of Bank Victoria Continuous Subordinated Bonds III Phase I 2024	28 Juni 2024 28 June 2024	500.000.000.000	8.212.208.382	491.787.791.618	491.787.791.618	491.787.791.618	491.787.791.618	491.787.791.618	0
Pelaksanaan Waran Seri VII Execution of Series VII Warrants	5 Desember 2022 5 December 2022	584.400	-	584.400	584.400	584.400	584.400	584.400	0
Total			**14.657.564.043**	**985.343.020.357**	**985.343.020.357**	**985.343.020.357**	**985.343.020.357**	**985.343.020.357**	**0**

Informasi Material Investasi, Ekspansi, Divestasi, Penggabungan/Peleburan Usaha, Akuisisi, dan Restrukturisasi Utang/Modal

Material Information on Investment, Expansion, Divestment, Business Merger/Consolidation, Acquisition, and Debt/Capital Restructuring

Investasi

Pada periode 2024, Bank Victoria melakukan investasi dalam efek-efek dengan uraian sebagai berikut:

Investments

In the 2024 period, Bank Victoria invested in securities with the following descriptions:

(dalam juta Rupiah / in million Rupiah)

Uraian	2024	2023	Description
Nilai Wajar melalui Laba Rugi **Fair Value through Profit or Loss**			
Obligasi Pemerintah	**146,629**	-	Government Bonds
Reksadana	**-**	790,570	Mutual Funds
Wesel Jangka Menengah	**-**	221,960	Medium-Term Notes
Subtotal	**146,629**	**1,012,530**	**Subtotal**
Nilai Wajar melalui Penghasilan Komprehensif Lain **Fair Value through Other Comprehensive Income**			
Surat Utang Negara	**1,117,504**	757,213	Government Promissory Notes
Reksadana	**836,818**	306,932	Mutual Funds
Surat Berharga Negara	**287,857**	308,245	Government Sharia Bonds
Obligasi Korporasi	**204,964**	12,082	Corporate Bonds
Wesel Jangka Menengah	**203,190**	-	Medium-Term Notes
Efek Beragun Aset	**1,002**	8,508	Asset-Backed Security
Surat Berharga Syariah Korporasi	**-**	20,283	Corporate Sharia Bonds
Subtotal	**2,651,335**	**1,413,264**	**Subtotal**

Uraian	2024	2023	Description
Biaya Perolehan Diamortisasi **Amortised Cost**			
Surat Utang Negara	**3,239,743**	3,547,973	Government Promissory Notes
Sekuritas Rupiah Bank Indonesia (SRBI)	**760,505**	9,389	Bank Indonesia Rupiah Securities (SRBI)
Obligasi Korporasi	**571,465**	196,439	Corporate Bonds
Reksadana	**75,952**	73,000	Mutual Funds
Surat Berharga Syariah Korporasi	**16,972**	16,956	Corporate Sharia Bonds
Surat Berharga Syariah Negara	**1,388**	1,013	Government Sharia Bonds
Wesel Jangka Menengah	**-**	15,000	Medium-Term Notes
Subtotal	**4,666,025**	**3,859,770**	**Subtotal**
Total	**7,463,989**	**6,285,564**	**Total**
Dikurangi			**Less**
Cadangan Kerugian Penurunan Nilai	**(1,266)**	(8,272)	Allowance for Impairment Losses
Total	**7,462,723**	**6,277,292**	**Total**

Restrukturisasi Utang dan/atau Restrukturisasi Modal

Restrukturisasi utang yang dilakukan Bank Victoria pada tahun 2024 diuraikan sebagai berikut:

Debt Restructuring and/or Capital Restructuring

The debt restructuring carried out by Bank Victoria in 2024 is outlined as follows:

(dalam juta Rupiah / in million Rupiah)

Uraian	2024	2023	Description
Penjadwalan Kembali Angsuran dan Perpanjangan Jangka Waktu Pinjaman	**2,206,450**	2,868,304	Rescheduling of Installments and the Extention of Credit Period
Dikurangi: Cadangan Kerugian Penurunan Nilai	**(342,681)**	(447,527)	Less: Allowance for Impairment Losses
Total	**1,863,769**	**2,420,777**	**Total**

Ekspansi, Divestasi, Penggabungan/Peleburan Usaha, dan Akuisisi

Selain melakukan kegiatan investasi dan restrukturisasi utang, Bank Victoria tidak melakukan kegiatan lain seperti ekspansi, divestasi, penggabungan/peleburan usaha, maupun akuisisi pada periode 2024.

Expansion, Divestment, Businesses Merger/Consolidation, and Acquisition

In addition to carrying out investment and debt restructuring activities, Bank Victoria did not carry out other activities such as expansion, divestment, merger/consolidation of businesses, or acquisitions in the 2024 period.

Informasi Transaksi Material yang Mengandung Benturan Kepentingan

Sepanjang tahun 2024, Bank Victoria tidak melakukan transaksi yang bersifat material dan mengandung unsur benturan kepentingan.

Information on Material Transactions with Conflict of Interest

In 2024, Bank Victoria carried out transactions with affiliated parties which ere part of the Bank's business activities.

Informasi Transaksi dengan Pihak Afiliasi

Pada tahun 2024, Bank Victoria melakukan transaksi dengan pihak afiliasi yang merupakan bagian dari kegiatan usaha Bank. Transaksi tersebut dilakukan dalam rangka menghasilkan pendapatan usaha

Information of Transaction with Affiliated Parties

In 2024, Bank Victoria made transactions with affiliated parties, which were part of the Bank's business activities. The transaction is conducted to generate business income and is carried out

dan dijalankan secara rutin, berulang, dan/atau berkelanjutan. Rincian dari transaksi afiliasi tersebut diuraikan sebagai berikut:

periodically, repeatedly, and/or continuously. The details of the affiliate transaction are outlined as follows:

Tanggal Date	Nama Pihak Name of Parties	Sifat Hubungan Afiliasi Nature of Affiliation Relationship	Objek Transaksi Objects of Transaction	Alasan Dilakukannya Transaksi Reasons for Conducting Transactions	Nilai Transaksi Transaction Value (Rp)
2 Februari 2024	• Bank Victoria; dan / and • PT Victoria Insurance Tbk.	• PT Victoria Insurance Tbk dimiliki sahamnya oleh PT Victoria Investama Tbk sebesar 72,95%; dan • PT Victoria Investama Tbk merupakan Pemegang Saham Pengendali Bank Victoria yang memiliki saham sebesar 44,23%.	Perlindungan asuransi *cash in safe*.	Melakukan kerja sama dengan PT Victoria Insurance Tbk untuk polis asuransi *cash in safe* (CIS) atas 38 lokasi kantor cabang berupa *Cash*, *Bank Notes*, dan *Currency Notes*.	163,838,803
2 February 2024		• PT Victoria Investama Tbk owns 72.95% shares of PT Victoria Insurance Tbk; and • PT Victoria Investama Tbk is a Controlling Shareholder of Bank Victoria with shares of 44.23%.	Cash in safe insurance protection.	Cooperating with PT Victoria Insurance Tbk for cash in safe (CIS) insurance policy for 38 branch office locations in the form of Cash, Bank Notes, and Currency Notes.	
16 Februari 2024	• Bank Victoria; dan / and • PT Victoria Insurance Tbk.	• PT Victoria Insurance Tbk dimiliki sahamnya oleh PT Victoria Investama Tbk sebesar 72,95%; dan • PT Victoria Investama Tbk merupakan Pemegang Saham Pengendali Bank Victoria yang memiliki saham sebesar 44,23%.	Bank Victoria Kantor Cabang Surabaya Lantai 4.	Meningkatkan sinergi dan *cross selling* antar Grup Victoria.	65,448,000
16 February 2024		• PT Victoria Investama Tbk owns 72.95% shares of PT Victoria Insurance Tbk; and • PT Victoria Investama Tbk is a Controlling Shareholder of Bank Victoria with shares of 44.23%.	Bank Victoria Surabaya Branch Office 4th Floor.	Increasing synergy and cross selling within the Victoria Group.	
4 Maret 2024	• Bank Victoria; dan / and • PT Victoria Insurance Tbk.	• PT Victoria Insurance Tbk dimiliki sahamnya oleh PT Victoria Investama Tbk sebesar 72,95%; dan • PT Victoria Investama Tbk merupakan Pemegang Saham Pengendali Bank Victoria yang memiliki saham sebesar 44,23%.	Perlindungan asuransi gedung (*building & inventory*).	Melakukan kerja sama dengan PT Victoria Insurance Tbk untuk polis asuransi *property all risk* atas 26 lokasi kantor Bank Victoria dengan objek pertanggungan berupa kerusakan atau kerugian pada harta benda akibat kebakaran, bencana alam, kerusuhan atau kerusakan lainnya.	88,503,091
4 March 2024		• PT Victoria Investama Tbk owns 72.95% shares of PT Victoria Insurance Tbk; and • PT Victoria Investama Tbk is a Controlling Shareholder of Bank Victoria with shares of 44.23%.	Building & inventory insurance coverage.	Cooperating with PT Victoria Insurance Tbk for property all risk insurance policy for 26 Bank Victoria office locations with the object of insurance in the form of damage or loss to property due to fire, natural disasters, riots or other damage.	

Tanggal Date	Nama Pihak Name of Parties	Sifat Hubungan Afiliasi Nature of Affiliation Relationship	Objek Transaksi Objects of Transaction	Alasan Dilakukannya Transaksi Reasons for Conducting Transactions	Nilai Transaksi Transaction Value (Rp)
2 September 2024	• Bank Victoria; dan / and • PT Victoria Insurance Tbk.	• PT Victoria Insurance Tbk dimiliki sahamnya oleh PT Victoria Investama Tbk sebesar 72,95%; dan • PT Victoria Investama Tbk merupakan Pemegang Saham Pengendali Bank Victoria yang memiliki saham sebesar 44,23%.	Perlindungan asuransi gedung (*building & inventory*).	Melakukan kerja sama dengan PT Victoria Insurance Tbk untuk polis asuransi *property all risk* atas 33 lokasi kantor Bank Victoria dengan objek pertanggungan berupa kerusakan atau kerugian pada harta benda akibat kebakaran, bencana alam, kerusuhan, atau kerusakan lainnya.	139,353,340
2 September 2024		• PT Victoria Investama Tbk owns 72.95% shares of PT Victoria Insurance Tbk; and • PT Victoria Investama Tbk is a Controlling Shareholder of Bank Victoria with shares of 44.23%.	Building & inventory insurance coverage.	Cooperating with PT Victoria Insurance Tbk for property all risk insurance policy for 33 Bank Victoria office locations with the object of insurance in the form of damage or loss to property due to fire, natural disasters, riots, or other damage.	
2 September 2024	• Bank Victoria; dan / and • PT Victoria Insurance Tbk.	• PT Victoria Insurance Tbk dimiliki sahamnya oleh PT Victoria Investama Tbk sebesar 72,95%; dan • PT Victoria Investama Tbk merupakan Pemegang Saham Pengendali Bank Victoria yang memiliki saham sebesar 44,23%.	Perlindungan *Cash in Transit* (CIT).	Melakukan kerja sama dengan PT Victoria Insurance Tbk untuk polis asuransi *Cash in Transit* (CIT) *all risk of physical loss of or damage from whatsoever cause arising as original* untuk periode 1 September 2024-1 September 2025.	Di bayarkan berdasarkan transaksi uang transit di seluruh kantor cabang, dengan nilai maksimal pertahun Rp211,220,000,- (Rp10,000,000,000 x 0,02% x 12 bulan x 22 hari x 80% x 50%)
2 September 2024		• PT Victoria Investama Tbk owns 72.95% shares of PT Victoria Insurance Tbk; and • PT Victoria Investama Tbk is a Controlling Shareholder of Bank Victoria with shares of 44.23%.	Cash in Transit (CIT) Protection.	Cooperating with PT Victoria Insurance Tbk for Cash in Transit (CIT) insurance policy of all-risk of physical loss of or damage from whatsoever cause arising as original for the period of 1 September 2024-1 September 2025.	Paid based on transit money transactions at all branch offices, with a maximum value per year of Rp211,220,000 (Rp10,000,000,000 x 0.02% x 12 months x 22 days x 80% x 50%)
2 Desember 2024	• Bank Victoria; dan / and • PT Victoria Insurance Tbk.	• PT Victoria Insurance Tbk dimiliki sahamnya oleh PT Victoria Investama Tbk sebesar 72,95%; dan • PT Victoria Investama Tbk merupakan Pemegang Saham Pengendali Bank Victoria yang memiliki saham sebesar 44,23%.	Perlindungan atas 23 unit kendaraan (mobil dan motor).	Melakukan kerja sama dengan PT Victoria Insurance Tbk untuk polis asuransi kendaraan dengan objek pertanggungan atas 23 unit kendaraan (mobil dan motor) milik Bank Victoria.	90,981,958
2 December 2024		• PT Victoria Investama Tbk owns 72.95% shares of PT Victoria Insurance Tbk; and • PT Victoria Investama Tbk is a Controlling Shareholder of Bank Victoria with shares of 44.23%.	Protection for 23 vehicles (cars and motorcycles).	Cooperating with PT Victoria Insurance Tbk for a vehicle insurance policy with the insured object being 23 vehicles (cars and motorbikes) owned by Bank Victoria.	

Tanggal Date	Nama Pihak Name of Parties	Sifat Hubungan Afiliasi Nature of Affiliation Relationship	Objek Transaksi Objects of Transaction	Alasan Dilakukannya Transaksi Reasons for Conducting Transactions	Nilai Transaksi Transaction Value (Rp)
23 Desember 2024 **23 December 2024**	• Bank Victoria; dan / and • PT Asri Kencana Gemilang.	• PT Asri Kencana Gemilang dimiliki sahamnya oleh PT Bhuwanatala Indah Permai Tbk sebesar 99,99%; • PT Bhuwanatala Indah Permai Tbk dimiliki sahamnya oleh Safire Capital Ltd sebesar 66,52%; • Safire Capital Ltd dimiliki sahamnya oleh Chemical Asia Corporation Pte Ltd sebesar 100,00%; dan • Chemical Asia Corporation Pte Ltd dimiliki sahamnya oleh Louise Li sebesar 63,11% dan Louise Li merupakan anak dari Suzanna Tanojo (Pemegang Saham Pengendali). • PT Bhuwanatala Indah Permai Tbk owns 99.99% shares of PT Asri Kencana Gemilang; • Safire Capital Ltd owns 66.52% shares of PT Bhuwanatala Indah Permai Tbk; • Chemical Asia Corporation Pte Ltd owns 100.00% shares of Safire Capital Ltd; and • Louise Li owns 63.11% shares of Chemical Asia Corporation Pte Ltd, and Louise Li is the subsidiary of Suzanna Tanojo (Controlling Shareholder).	Gedung Graha BIP Lantai Dasar. Graha BIP Building Ground Floor.	Meningkatkan sinergi dan *cross selling* antar Grup Victoria. Increasing synergy and cross selling within the Victoria Group.	1,603,062,000
23 Desember 2024 **23 December 2024**	• Bank Victoria; dan / and • PT Asri Kencana Gemilang.	• PT Asri Kencana Gemilang dimiliki sahamnya oleh PT Bhuwanatala Indah Permai Tbk sebesar 99,99%; • PT Bhuwanatala Indah Permai Tbk dimiliki sahamnya oleh Safire Capital Ltd sebesar 66,52%; • Safire Capital Ltd dimiliki sahamnya oleh Chemical Asia Corporation Pte Ltd sebesar 100,00%; dan • Chemical Asia Corporation Pte Ltd dimiliki sahamnya oleh Louise Li sebesar 63,11% dan Louise Li merupakan anak dari Suzanna Tanojo (Pemegang Saham Pengendali). • PT Bhuwanatala Indah Permai Tbk owns 99.99% shares of PT Asri Kencana Gemilang; • Safire Capital Ltd owns 66.52% shares of PT Bhuwanatala Indah Permai Tbk; • Chemical Asia Corporation Pte Ltd owns 100.00% shares of Safire Capital Ltd; and • Louise Li owns 63.11% shares of Chemical Asia Corporation Pte Ltd, and Louise Li is the subsidiary of Suzanna Tanojo (Controlling Shareholder).	Gedung Graha BIP Lantai Dasar. Graha BIP Building Ground Floor.	Meningkatkan sinergi dan *cross selling* antar Grup Victoria. Increasing synergy and cross selling within the Victoria Group.	2,769,228,000

Tanggal Date	Nama Pihak Name of Parties	Sifat Hubungan Afiliasi Nature of Affiliation Relationship	Objek Transaksi Objects of Transaction	Alasan Dilakukannya Transaksi Reasons for Conducting Transactions	Nilai Transaksi Transaction Value (Rp)
23 Desember 2024 **23 December 2024**	• Bank Victoria; dan / and • PT Asri Kencana Gemilang.	• PT Asri Kencana Gemilang dimiliki sahamnya oleh PT Bhuwanatala Indah Permai Tbk sebesar 99,99%; • PT Bhuwanatala Indah Permai Tbk dimiliki sahamnya oleh Safire Capital Ltd sebesar 66,52%; • Safire Capital Ltd dimiliki sahamnya oleh Chemical Asia Corporation Pte Ltd sebesar 100,00%; dan • Chemical Asia Corporation Pte Ltd dimiliki sahamnya oleh Louise Li sebesar 63,11% dan Louise Li merupakan anak dari Suzanna Tanojo (Pemegang Saham Pengendali). • PT Bhuwanatala Indah Permai Tbk owns 99.99% shares of PT Asri Kencana Gemilang; • Safire Capital Ltd owns 66.52% shares of PT Bhuwanatala Indah Permai Tbk; • Chemical Asia Corporation Pte Ltd owns 100.00% shares of Safire Capital Ltd; and • Louise Li owns 63.11% shares of Chemical Asia Corporation Pte Ltd, and Louise Li is the subsidiary of Suzanna Tanojo (Controlling Shareholder).	Gedung Graha BIP Lantai 9. Graha BIP Building 9th Floor.	Meningkatkan sinergi dan *cross selling* antar Grup Victoria. Increasing synergy and cross selling within the Victoria Group.	827,172,000

Transaksi dengan Afiliasi dan Kewajaran Transaksi

Seluruh transaksi dengan pihak afiliasi pada tahun 2024 dilakukan secara wajar (*Arm's Length*) dan sesuai dengan peraturan perundang-undangan. Transaksi dilakukan atas dasar alasan kebutuhan Bank dan bebas dari konflik kepentingan.

Pemenuhan Peraturan dan Ketentuan Terkait

Bank telah memenuhi peraturan dan ketentuan terkait, yaitu Peraturan Otoritas Jasa Keuangan No. 42/POJK/04/2020 tanggal 1 Juli 2020 tentang Transaksi Afiliasi dan Transaksi Benturan Kepentingan.

Pernyataan Dewan Komisaris, Direksi, dan Komite Audit

Direksi menyatakan bahwa transaksi dengan pihak afiliasi ini telah melalui prosedur yang memadai untuk memastikan bahwa transaksi dilaksanakan sesuai dengan praktik bisnis yang berlaku umum antara lain dilakukan dengan memenuhi prinsip transaksi yang wajar (*arms length principle*). Selain itu, peran Dewan Komisaris dan Komite Audit dalam melakukan prosedur yang memadai untuk memastikan bahwa transaksi dilaksanakan sesuai dengan praktik bisnis yang berlaku umum antara lain dilakukan dengan memenuhi prinsip transaksi yang wajar (*arms length principle*).

Transactions with Affiliates and Fairness of Transactions

All transactions with affiliated parties in 2024 were done in Arm's Length and in accordance with laws and regulations. The transactions are conducted based on the Bank's needs and free of any conflict of interest.

Fulfillment of Related Regulations and Provisions

The Bank has complied with related laws and regulation, that is Financial Services Authority Regulation No. 42/POJK/04/2020 dated 1 July 2020 on Transactions with Affiliation and Transactions with Conflict of Interest.

Statement of Board of Commissioners, Board of Directors, and Audit Committee

The Board of Directors states that transactions with affiliated parties were done with adequate procedures to ensure that the transactions were done in accordance with generally accepted business practices, among others, by complying with the arms-length principle. In addition, the role of the Board of Commissioners and the Audit Committee in performing adequate procedures to ensure that transactions were carried out in accordance with generally accepted business practices, among others, by complying with the arms-length principle.

Transaksi dengan Pihak Berelasi

Dalam kegiatan usaha normal, Bank Victoria melakukan transaksi dengan pihak berelasi berdasarkan syarat dan ketentuan yang disepakati oleh kedua belah pihak secara wajar, tanpa adanya perlakuan khusus atau hubungan istimewa. Informasi lebih lanjut mengenai transaksi dengan pihak-pihak berelasi dapat ditemukan dalam Catatan No. 39 tentang Informasi Mengenai Pihak-Pihak Berelasi pada halaman 125 dalam Laporan Keuangan.

Transaction with Related Parties

In routine business activities, Bank Victoria makes transactions with related parties based on terms and conditions agreed by both parties fairly, without any special treatment or special relationship. Further information regarding transactions with related parties can be found in Note No. 39 on Information Regarding Related Parties on page 125 in the Financial Statements.

Komitmen dan Kontinjensi

Pengungkapan atas komitmen dan kontinjensi yang dimiliki Bank Victoria per 31 Desember 2024 dan 2023 disajikan untuk memberikan gambaran mengenai kewajiban potensial yang mungkin timbul di masa mendatang. Rincian informasi tersebut dapat dilihat pada tabel berikut:

Commitments and Contingencies

Disclosure of commitments and contingencies held by Bank Victoria as of 31 December 2024 and 2023 is presented to provide an overview of potential liabilities that may arise in the future. Details of this information can be seen in the following table:

(dalam juta Rupiah / in million Rupiah)

Uraian	2024	2023	Description
Komitmen **Commitments**			
Liabilitas Komitmen			**Commitment Liabilities**
Fasilitas Pinjaman yang Belum Digunakan			Unused Loans Facilities
Pihak Berelasi	**(3,600)**	(17,037)	Related Party
Pihak Ketiga	**(4,657,964)**	(5,280,610)	Third Parties
Liabilitas Komitmen Bersih	**(4,661,564)**	**(5,297,647)**	**Commitment Liabilities - Net**
Kontinjensi **Contingencies**			
Tagihan Kontinjensi			**Contingent Receivables**
Pendapatan Bunga atas Pinjaman Bermasalah - Pihak Ketiga	**263,555**	311,524	Interest Receivables on Non-Performing Loans - Third Parties
Liabilitas Kontinjensi			**Contingent Liabilities**
Garansi yang Diterbitkan – Pihak Berelasi	**(271)**	(271)	Guarantees Issued – Related Parties
Garansi yang Diterbitkan – Pihak Ketiga	**(521,872)**	(982,532)	Guarantees Issued – Third Parties
Letter of Credit	**(169,275)**	(60,564)	Letter of Credit
Kontinjensi Bersih	**(427,863)**	**(731,843)**	**Contingencies - Net**
Total Liabilitas Komitmen dan Kontinjensi – Bersih	**(5,089,427)**	**(6,029,490)**	**Total Commitment and Contingencies Liabilities – Net**

Larangan, Batasan, dan/atau Hambatan Signifikan untuk Melakukan Transfer Dana Antara Bank dan Entitas Lain dalam Satu Kelompok Usaha

Bank Victoria tidak memiliki larangan atau batasan dalam prosedur operasional terkait transfer dana nasabah, baik untuk transaksi masuk maupun keluar, antara Bank dan entitas lain dalam 1 (satu) kelompok usaha. Dalam hal penyaluran pinjaman kepada pihak ketiga maupun kepada entitas dalam kelompok usaha yang sama, Bank Victoria senantiasa mengacu pada ketentuan Batas Maksimum Pemberian Kredit (BMPK) yang telah disusun oleh Divisi *Accounting* dan dipantau secara berkesinambungan oleh Divisi *Compliance, System Procedure & Customer Protection*, serta Divisi *Credit Risk Review*.

Prohibitions, Restrictions, and/or Significant Barriers to Transfer Funds between the Bank and Other Entities in One Business Group

Bank Victoria has no restrictions or limitations in operational procedures regarding customer's fund transfer, either incoming or outgoing transactions, between the Bank and other entities in 1 (one) business group. In terms of lending to third parties or to entities within the same business group, Bank Victoria always refers to the provisions of Legal Lending Limit (LLL) that have been prepared by the Accounting Division and are continuously monitored by the Compliance, System Procedure & Customer Protection Division, and Credit Risk Review Division.

Perubahan Peraturan Perundang-Undangan yang Berpengaruh Signifikan Terhadap Kinerja Bank

Sepanjang tahun berjalan, regulator telah menerbitkan sejumlah peraturan perundang-undangan yang memberikan dampak signifikan terhadap kinerja operasional dan kepatuhan Bank Victoria. Penyesuaian terhadap peraturan tersebut menjadi bagian penting dalam memastikan kelangsungan usaha dan tata kelola yang sesuai ketentuan. Penjelasan lebih lanjut mengenai perubahan peraturan yang dimaksud disajikan dalam tabel berikut:

Amendments to Laws and Regulations with Significant Impacts on the Bank's Performance

Throughout the year, regulators issued a number of laws and regulations with significant impact on Bank Victoria's operational performance and compliance. Adjustments to these regulations are important part of ensuring business continuity and governance in accordance with the provisions. Further explanation of the changes to the regulations is presented in the following table:

Peraturan Regulation	**Dampak Terhadap Laporan Keuangan** Impact on Financial Statements	**Penyesuaian yang Dilakukan** Adjustment Made
Peraturan Bank Indonesia No. 2 Tahun 2024 tentang Keamanan Sistem Informasi dan Ketahan Siber (KKS) Bank Indonesia Regulation No. 2 of 2024 on Information System Security and Cyber Resilience (KKS)	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements	Surat Keputusan Direksi No. 009A/SK-DIR/06/23 tanggal 9 Juni 2023 tentang Kebijakan Ketahanan dan Keamanan Siber Board of Directors' Decision Letter No. 009A/SK-DIR/06/23 dated 9 June 2023 on Cyber Resilience and Security Policy
Peraturan Bank Indonesia No. 6 Tahun 2024 tentang Pasar Uang dan Pasar Valuta Asing Bank Indonesia Regulation No. 6 of 2024 on Money Markets and Foreign Exchange Markets	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements	Sosialisasi Peraturan Bank Indonesia No. 6 Tahun 2024 tentang Pasar Uang dan Pasar Valuta Asing Dissemination of Bank Indonesia Regulation No. 6 of 2024 on Money Markets and Foreign Exchange Markets
Peraturan Anggota Dewan Gubernur No. 4 Tahun 2024 tentang Perubahan Atas Peraturan Anggota Dewan Gubernur No. 11 Tahun 2023 tentang Peraturan Pelaksanaan Kebijakan Insentif Likuiditas Makroprudensial Regulation of Members of the Board of Governors No. 4 of 2024 on Amendments to Regulation of Members of the Board of Governors No. 11 of 2023 on Implementation of Regulations for Macroprudential Liquidity Incentive Policy	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements	Sosialisasi Peraturan Anggota Dewan Gubernur No. 04 Tahun 2024 tentang Perubahan Atas Peraturan Anggota Dewan Gubernur No. 11 Tahun 2023 tentang Peraturan Pelaksanaan Kebijakan Insentif Likuiditas Makroprudensial Dissemination on the Regulation of the Members of the Board of Governors No. 04 of 2024 on Amendments to Regulation of Members of the Board of Governors No. 11 of 2023 on Implementation of Regulations for Macroprudential Liquidity Incentive Policy
Peraturan Anggota Dewan Gubernur No. 5 Tahun 2024 tentang Perubahan Atas Peraturan Anggota Dewan Gubernur No. 21/12/PADG/2019 tentang Penyelenggaraan Transfer Dana dan Kliring Berjadwal oleh Bank Indonesia Regulation of the Members of the Board of Governors No. 5 of 2024 on Amendments to Regulation of Members of the Board of Governors No. 21/12/PADG/2019 on Administering Fund Transfer and Scheduled Clearing by Bank Indonesia	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements	Surat Keputusan Direksi No. 006/SK-DIR/07/24 tanggal 26 Juli 2024 tentang Standar Operasional Prosedur Sistem Kliring Nasional – Bank Indonesia Generasi II (SKN-BI Gen II) Board of Directors' Decision Letter No. 006/SK-DIR/07/24 dated 26 July 2024 on Standard Operating Procedures for the National Clearing System – Bank Indonesia Generation II (SKN-BI Gen II)
Peraturan Anggota Dewan Gubernur No. 6 Tahun 2024 tentang Perubahan Atas Peraturan Anggota Dewan Gubernur No. 4 Tahun 2023 tentang Devisa Hasil Ekspor dan Devisa Pembayaran Impor Regulation of the Members of the Board of Governors No. 6 of 2024 on Amendments to Regulation of Members of the Board of Governors No. 4 of 2023 on Foreign Exchange Proceeds from Exports and Foreign Exchange Payments for Imports	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements	Sosialisasi Peraturan Anggota Dewan Gubernur No. 6 Tahun 2024 tentang Perubahan Atas Peraturan Anggota Dewan Gubernur No. 4 Tahun 2023 tentang Devisa Hasil Ekspor dan Devisa Pembayaran Impor Dissemination on the Regulation of the Members of the Board of Governors No. 6 of 2024 on Amendments to Regulation of Members of the Board of Governors No. 4 of 2023 on Foreign Exchange Proceeds from Exports and Foreign Exchange Payments for Imports
Peraturan Anggota Dewan Gubernur No. 8 Tahun 2024 tentang Perubahan Keenam Atas Peraturan Anggota Dewan Gubernur No. 20/15/PADG/2018 tentang Penyelenggaraan Setelmen Dana Seketika Melalui Sistem Bank Indonesia–*Real Time Gross Settlement* Regulation of the Members of the Board of Governors No. 8 of 2024 on Sixth Amendment to Regulation of Members of the Board of Governors No. 20/15/PADG/2018 on the Implementation of Real-Time Fund Settlement through Bank Indonesia System–Real Time Gross Settlement	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements	Surat Keputusan Direksi No. 014/SK-DIR/08/24 tanggal 30 Agustus 2024 tentang Kebijakan Bank Indonesia - *Real Time Gross Settlement* (BI-RTGS) Board of Directors' Decision Letter No. 014/SK-DIR/08/24 dated 30 August 2024 on Bank Indonesia Policy - Real Time Gross Settlement (BI-RTGS)
Peraturan Anggota Dewan Gubernur No. 11 Tahun 2024 tentang Transaksi Pasar Valuta Asing Regulation of the Members of the Board of Governors No. 11 of 2024 on Foreign Exchange Market Transactions	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements	Sosialisasi Peraturan Anggota Dewan Gubernur No. 11 Tahun 2024 tentang Transaksi Pasar Valuta Asing Dissemination on the Regulation of the Members of the Board of Governors No. 11 of 2024 on Foreign Exchange Market Transactions

Peraturan Regulation	Dampak Terhadap Laporan Keuangan Impact on Financial Statements	Penyesuaian yang Dilakukan Adjustment Made
Peraturan Anggota Dewan Gubernur No. 13 Tahun 2024 tentang Transaksi Pasar Uang Regulation of the Members of the Board of Governors No. 13 of 2024 on Money Market Transactions	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements	Sosialisasi Peraturan Anggota Dewan Gubernur No. 13 Tahun 2024 tentang Transaksi Pasar Uang Dissemination on the Regulation of the Members of the Board of Governors No. 13 of 2024 on Money Market Transactions
Peraturan Anggota Dewan Gubernur No. 20 Tahun 2023 tentang Tata Cara Pelaksanaan Perlindungan Konsumen Bank Indonesia Regulation of Members of the Board of Governors No. 20 of 2023 on Procedures for the Implementation of Bank Indonesia Consumer Protection	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements	Surat Keputusan Direksi No. 017/SK-DIR/10/24 tanggal 28 Oktober 2024 tentang Kebijakan Perlindungan Konsumen Board of Directors' Decision Letter No. 017/SK-DIR/10/24 dated 28 October 2024 on Consumer Protection Policy
Peraturan Otoritas Jasa Keuangan No. 21 Tahun 2023 tentang Layanan Digital oleh Bank Umum Financial Services Authority Regulation No. 21 of 2023 on Digital Services by Commercial Banks	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements	Surat Keputusan Direksi No. 015/SK-DIR/01/24 tanggal 22 Januari 2024 tentang Kebijakan Layanan Digital Board of Directors' Decision Letter No. 015/SK-DIR/01/24 dated 22 January 2024 on Digital Service Policy
Peraturan Otoritas Jasa Keuangan No. 22 Tahun 2023 tentang Perlindungan Konsumen dan Masyarakat di Sektor Jasa Keuangan Financial Services Authority Regulation No. 22 of 2023 on Consumer and Community Protection in the Financial Services Sector	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements	Surat Keputusan Direksi No. 017/SK-DIR/10/24 tanggal 28 Oktober 2024 tentang Kebijakan Perlindungan Konsumen Board of Directors' Decision Letter No. 017/SK-DIR/10/24 dated 28 October 2024 on Consumer Protection Policy
Peraturan Otoritas Jasa Keuangan No. 5 Tahun 2024 tentang Penetapan Status Pengawasan dan Penanganan Permasalahan Bank Umum Financial Services Authority Regulation No. 5 of 2024 on Determination of Supervision Status and Handling of Commercial Bank Problems	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements	Surat Keputusan Direksi No. 005/SK-DIR/11/24 tanggal 13 November 2024 tentang Laporan *Recovery Plan* Board of Directors' Decision Letter No. 005/SK-DIR/11/24 dated 13 November 2024 on Recovery Plan Report
Peraturan Otoritas Jasa Keuangan No. 11 tahun 2024 tentang Perubahan Kedua Atas Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2017 tentang Pelaporan dan Permintaan Informasi Debitur Melalui Sistem Layanan Informasi Keuangan Financial Services Authority Regulation No. 11 of 2024 on Second Amendment to Financial Services Authority Regulation No. 18/POJK.03/2017 on Reporting and Request for Debtor Information through Financial Information Service System	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements	Surat Keputusan Direksi No. 010/SK-DIR/02/24 tanggal 29 Februari 2024 tentang Kebijakan Sistem Layanan Informasi Keuangan (SLIK) Board of Directors' Decision Letter No. 010/SK-DIR/02/24 dated 29 February 2024 on Financial Information Service System (SLIK) Policy
Peraturan Otoritas Jasa Keuangan No. 12 Tahun 2024 tentang Penerapan Strategi *Anti-Fraud* Bagi Lembaga Jasa Keuangan Financial Services Authority Regulation No. 12 of 2024 on Implementation of Anti-Fraud Strategies for Financial Services Institutions	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements	Surat Keputusan Direksi No. 007/SK-DIR/10/24 tanggal 16 Oktober 2024 tentang Kebijakan Penerapan Strategi *Anti-Fraud* Board of Directors' Decision Letter No. 007/SK-DIR/10/24 dated 16 October 2024 on Policy for Implementing Anti-Fraud Strategies
Peraturan Otoritas Jasa Keuangan No. 13 Tahun 2024 tentang Transparansi dan Publikasi Suku Bunga Dasar Kredit Bagi Bank Umum Konvensional Financial Services Authority Regulation No. 13 of 2024 on Transparency and Publication of Prime Lending Rates for Conventional Commercial Banks	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements	Surat Keputusan Direksi No. 010/SK-DIR/09/24 tanggal 26 September 2024 tentang Pedoman Publikasi dan Pelaporan Suku Bunga Dasar Kredit (SBDK) Board of Directors' Decision Letter No. 010/SK-DIR/09/24 dated 26 September 2024 on Guidelines for Publication and Reporting of Prime Lending Rate (SBDK)
Peraturan Otoritas Jasa Keuangan No. 15 Tahun 2024 tentang Integritas Pelaporan Keuangan Bank Financial Services Authority Regulation No. 15 of 2024 on Integrity of Financial Reporting of the Bank	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements	Sosialisasi Peraturan Otoritas Jasa Keuangan No. 15 Tahun 2024 tentang Integritas Pelaporan Keuangan Bank Dissemination of Financial Services Authority Regulation No. 15 of 2024 on Integrity of Financial Reporting of the Bank
Peraturan Otoritas Jasa Keuangan No. 18 Tahun 2024 tentang Penyedia Likuiditas Financial Services Authority Regulation No. 18 of 2024 on Liquidity Providers	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements	Sosialisasi Peraturan Otoritas Jasa Keuangan No. 18 Tahun 2024 tentang Penyedia Likuiditas Dissemination of Financial Services Authority Regulation No. 18 of 2024 on Liquidity Providers
Peraturan Otoritas Jasa Keuangan No. 19 Tahun 2024 tentang Perubahan Atas Peraturan Otoritas Jasa Keuangan Nomor 42/POJK.03/2015 tentang Kewajiban Pemenuhan Rasio Kecukupan Likuiditas (*Liquidity Coverage Ratio*) Bagi Bank Umum	Tidak berdampak signifikan terhadap Laporan Keuangan Bank	Sosialisasi Peraturan Otoritas Jasa Keuangan No. 19 Tahun 2024 tentang Perubahan Atas Peraturan Otoritas Jasa Keuangan No. 42/POJK.03/2015 tentang Kewajiban Pemenuhan Rasio Kecukupan Likuiditas (*Liquidity Coverage Ratio*) Bagi Bank Umum

Peraturan Regulation	Dampak Terhadap Laporan Keuangan Impact on Financial Statements	Penyesuaian yang Dilakukan Adjustment Made
Financial Services Authority Regulation No. 19 of 2024 on Amendments to Financial Services Authority Regulation No. 42/POJK.03/2015 on the Obligation of Fulfillment of Liquidity Coverage Ratio for Commercial Banks	Has no significant impact on the Bank's Financial Statements	Dissemination of Financial Services Authority Regulation No. 19 of 2024 on Amendment to Financial Services Authority Regulation No. 42/POJK.03/2015 on the Obligation of Fulfillment of Liquidity Coverage Ratio for Commercial Banks
Peraturan Otoritas Jasa Keuangan No. 20 Tahun 2024 tentang Perubahan Atas Peraturan Otoritas Jasa Keuangan No. 50/POJK.03/2017 tentang Kewajiban Pemenuhan Rasio Pendanaan Stabil Bersih (*Net Stable Funding Ratio*) Bagi Bank Umum	Tidak berdampak signifikan terhadap Laporan Keuangan Bank	Sosialisasi Peraturan Otoritas Jasa Keuangan No. 20 tahun 2024 tentang Perubahan Atas Peraturan Otoritas Jasa Keuangan No. 50/POJK.03/2017 tentang Kewajiban Pemenuhan Rasio Pendanaan Stabil Bersih (*Net Stable Funding Ratio*) Bagi Bank Umum
Financial Services Authority Regulation No. 20 of 2024 on Amendment to Financial Services Authority Regulation No. 50/POJK.03/2017 on Obligation of Fulfillment of Net Stable Funding Ratio for Commercial Banks	Has no significant impact on the Bank's Financial Statements	Dissemination of Financial Services Authority Regulation No. 20 of 2024 on Amendment to Financial Services Authority Regulation No. 50/POJK.03/2017 on Obligation of Fulfillment of Net Stable Funding Ratio for Commercial Banks
Surat Edaran Otoritas Jasa Keuangan No. 11/SEOJK.01/2024 tentang Pelaporan dan Permintaan Informasi Debitur Melalui Sistem Layanan Informasi Keuangan	Tidak berdampak signifikan terhadap Laporan Keuangan Bank	Surat Keputusan Direksi No. 010/SK-DIR/02/24 tanggal 29 Februari 2024 tentang Kebijakan Sistem Layanan Informasi Keuangan (SLIK)
Financial Services Authority Circular No. 11/SEOJK.01/2024 on Reporting and Request for Debtor Information through Financial Information Service System	Has no significant impact on the Bank's Financial Statements	Board of Directors' Decision Letter No. 010/SK-DIR/02/24 dated 29 February 2024 on Financial Information Service System (SLIK) Policy
Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.08/2024 tentang Penyusunan dan Penyampaian Laporan Rencana dan Laporan Realisasi Literasi Keuangan dan Inklusi Keuangan	Tidak berdampak signifikan terhadap Laporan Keuangan Bank	Surat Keputusan Direksi No. 001/SK-DIR/08/24 tanggal 1 Agustus 2024 tentang Kebijakan Literasi dan Inklusi Keuangan
Financial Services Authority Circular No. 13/SEOJK.08/2024 on Preparation and Submission of Financial Literacy and Financial Inclusion Plan and Realization Report	Has no significant impact on the Bank's Financial Statements	Board of Directors' Decision Letter No. 001/SK-DIR/08/24 dated 1 August 2024 on Financial Literacy and Inclusion Policy
Surat Edaran Otoritas Jasa Keuangan No. 18/SEOJK.08/2024 tentang Penilaian Sendiri terhadap Pemenuhan Ketentuan Perlindungan Konsumen dan Masyarakat di Sektor Jasa Keuangan	Tidak berdampak signifikan terhadap Laporan Keuangan Bank	Surat Keputusan Direksi No. 017/SK-DIR/10/24 tanggal 28 Oktober 2024 tentang Kebijakan Perlindungan Konsumen
Financial Services Authority Circular No. 18/SEOJK.08/2024 on Self-Assessment of Compliance with Consumer and Community Protection Provisions in the Financial Services Sector	Has no significant impact on the Bank's Financial Statements	Board of Directors' Decision Letter No. 017/SK-DIR/10/24 dated 28 October 2024 on Consumer Protection Policy

Perubahan Kebijakan Akuntansi

Perubahan kebijakan akuntansi dilakukan oleh Bank Victoria sebagai bentuk kepatuhan terhadap penerapan Pernyataan Standar Akuntansi Keuangan (PSAK) yang berlaku efektif pada tahun berjalan.

Pada 1 Januari 2024, beberapa standar baru dan amandemen terhadap standar yang masih berlaku mulai diterapkan, di antaranya:
1. Amandemen PSAK 201 (dahulu PSAK 1): Liabilitas Jangka Panjang dengan Kovenan;
2. Amandemen PSAK 116 (dahulu PSAK 73): Liabilitas Sewa dalam Jual Beli dan Sewa-balik; dan
3. Amandemen PSAK 207 dan PSAK 107 (dahulu PSAK 2 dan PSAK 60): Pengaturan Pembiayaan Pemasok.

Penerapan standar-standar tersebut tidak menyebabkan perubahan substansial pada kebijakan akuntansi Bank, serta tidak berdampak material terhadap laporan keuangan Bank baik pada tahun berjalan maupun tahun sebelumnya.

Amendments to Accounting Policies

Changes in accounting policies were made by Bank Victoria as a form of compliance with the implementation of Financial Accounting Standards Statement (PSAK) that are effective in the current year.

On 1 January 2024, several new standards and amendments to existing standards began to be implemented, including:
1. Amendment to PSAK 201 (formerly PSAK 1): Long-Term Liabilities with Covenants;
2. Amendment to PSAK 116 (formerly PSAK 73): Lease Liability in Sale and Leaseback; and
3. Amendment to PSAK 207 and PSAK 107 (formerly PSAK 2 and PSAK 60): Supplier Finance Arrangements.

The application of these standards does not cause substantial changes to the Bank's accounting policies, and does not have a material impact on the Bank's financial statements either in the current year or the previous year.



Aspek Pendukung Bisnis
Aspect of Business Support



Teknologi Informasi
Information Technology

Dalam beberapa tahun terakhir, preferensi nasabah telah beralih ke perilaku digital. Untuk mengimbangi perubahan tersebut, Bank memanfaatkan Teknologi Informasi (TI) dalam mengembangkan perbankan digital secara berkesinambungan dengan tetap mempertahankan keandalan dan keamanan transaksi. Bank juga terus mengembangkan ekosistem perbankan digital dan elektronik dengan berfokus pada pengembangan *mobile banking* dan *internet banking*.

In recent years, customer preferences have shifted to digital behavior. To keep up with these changes, the Bank utilizes Information Technology (IT) in developing digital banking on an ongoing basis while maintaining transaction reliability and security. The Bank also constantly develops a digital and electronic banking ecosystem by focusing on the development of mobile banking and internet banking.

Roadmap Teknologi Informasi

Roadmap pengembangan TI Bank disusun dan diselaraskan dengan rencana strategis jangka menengah dan panjang. Proses ini dilakukan melalui beberapa langkah kunci berikut:

1. Melakukan pengembangan berkelanjutan dalam *revamping internet banking* dan *mobile banking* dengan menyediakan fitur dan produk digital yang unggul dan bersaing serta dilengkapi dengan pembukaan rekening digital (*digital on boarding*) menggunakan teknologi *biometric* dan *face recognition*. Pembukaan rekening digital tersebut bertujuan untuk menarik minat nasabah baru serta nasabah yang sudah ada agar lebih mudah untuk menempatkan dana dan bertransaksi melalui Bank Victoria;
2. Melakukan pengembangan berkelanjutan dalam *revamping internet banking business* dengan fitur-fitur finansial dan non-finansial serta dilengkapi dengan fitur *cash management*, antara lain *virtual account* dan *payroll* untuk kebutuhan transaksi keuangan bagi nasabah yang mempunyai perusahaan;
3. Meningkatkan kualitas layanan kepada nasabah dengan melakukan pengembangan *digital operations*, yaitu melakukan aktivitas transaksi non-tunai dengan menggunakan teknologi *video banking*, sehingga dapat berinteraksi terhadap transaksi yang akan dilakukan secara virtual namun tetap mengedepankan prinsip kehati-hatian serta keamanan transaksi keuangan nasabah;
4. Melakukan kerja sama dengan pihak ketiga seperti kementerian, bank, lembaga keuangan non-bank, *e-commerce, online travel agent, peer to peer lending* dengan skema *platform business (omni channel)* untuk meningkatkan jumlah nasabah dan frekuensi transaksi;
5. Memperkenalkan ekosistem *digital lending* untuk menambah sumber nasabah kredit kepada Bank dan kecepatan proses kredit Bank kepada nasabah kredit;
6. Mengembangkan *digital onboarding* via *microsite* agar dapat dikoneksikan dengan pihak *front-end* lain atau *channel digital onboarding* yang bekerja sama dengan Bank;
7. Mengembangkan *loan channeling* melalui *financial technology*, bank perkreditan rakyat, *multifinance*, dan koperasi untuk memperluas akses pembiayaan;

Information Technology Roadmap

The Bank's IT development roadmap is prepared and aligned with the medium and long-term strategic plan. This process is carried out through the following key steps:

1. Carrying out continuous development in revamping internet banking and mobile banking by providing excellent and competitive digital features and products, equipped with digital account openings (digital on boarding) by using the technology of biometric and face recognition. The digital account opening is aimed to attract new customers and existing customers to make it easier in placing funds and making transactions through Bank Victoria;
2. Carrying out continuous development in revamping internet banking business with financial and non-financial features, equipped with cash management features, including virtual accounts and payroll for customers who have company's financial transaction needs;
3. Improving services quality to customers by developing digital operations, which is by conducting non-cash transaction activities using video banking technology, so that they can interact with transactions to be carried out virtually but still prioritizing the principle of prudence and security in customers' financial transactions;
4. Cooperating with third parties, such as ministries, banks, non-bank financial institutions, e-commerce, online travel agents, and peer to peer lending with a business platform (omni channel) scheme, to increase the number of customers and transaction frequency;
5. Introducing a digital lending ecosystem to increase the source of credit customers to the Bank and the speed of the Bank's loan process to credit customers;
6. Developing digital onboarding via microsite so that it can be connected to other front-end parties or digital onboarding channels that cooperate with the Bank;
7. Developing loan channeling through financial technology, rural banks, multifinance, and cooperatives to expand access to financing;

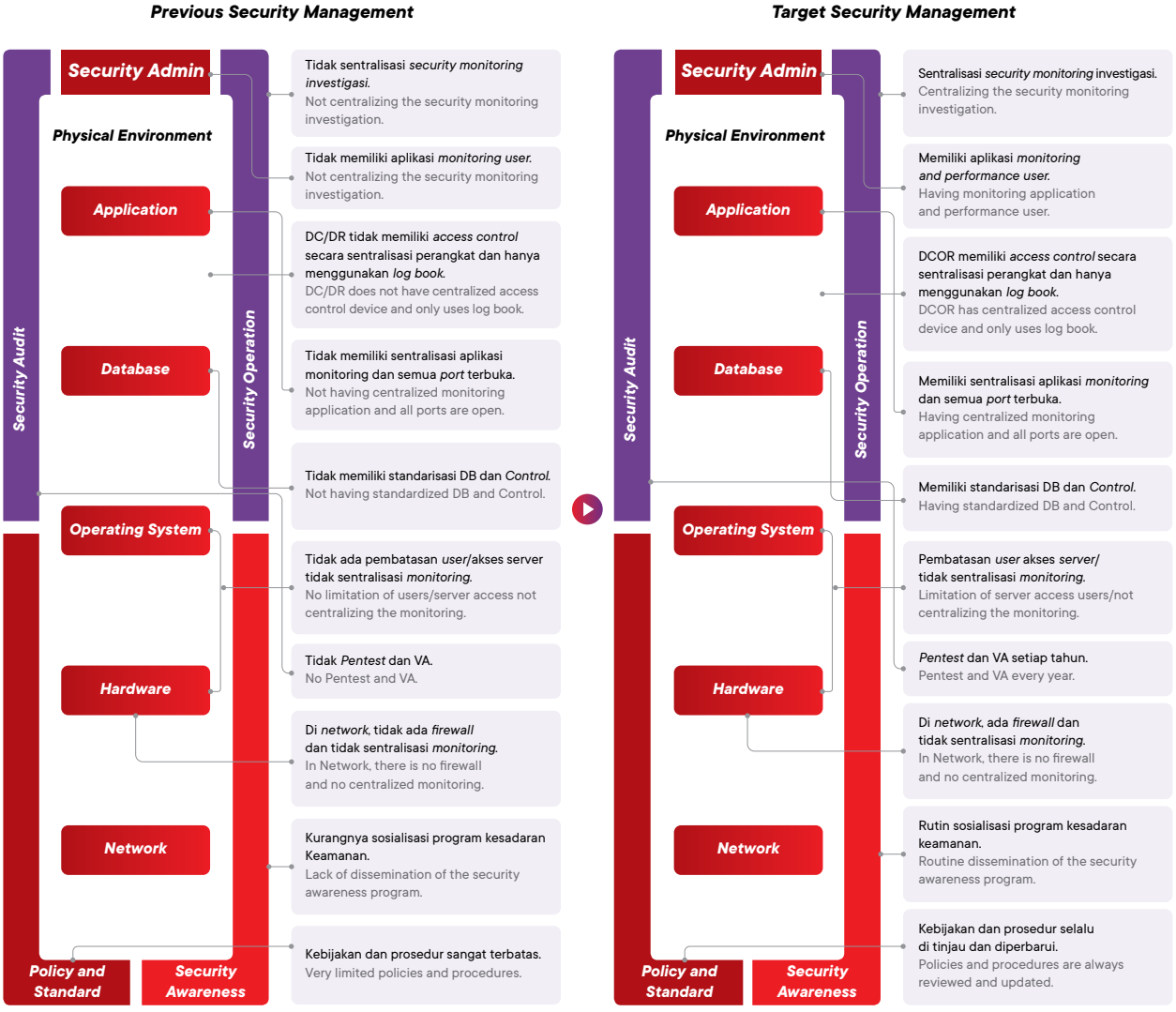
8. Menyesuaikan kebutuhan digital pada aplikasi *core banking* dan *middleware* guna meningkatkan efisiensi dan integrasi sistem; dan
9. Meningkatkan dan memperbarui infrastruktur teknologi guna mendukung operasional digital dan memastikan keandalan sistem perbankan.

Dalam penerapan *roadmap* TI, Bank Victoria berupaya untuk meningkatkan efisiensi operasional, memaksimalkan pemanfaatan teknologi informasi, serta mempertahankan daya saing di tengah dinamika pasar yang terus berkembang.

8. Adjusting digital needs in core banking and middleware applications to improve efficiency and system integration; and
9. Improving and updating technology infrastructure to support digital operations and ensure the reliability of banking system.

In implementing IT roadmap, Bank Victoria strives to improve operational efficiency, maximize information technology use, and maintain competitiveness amidst the ever-changing market.

Skema Rencana Strategis Keamanan Teknologi Informasi
Chart of Information Technology's Security Strategic Plan



> Investasi terbatas untuk infrastruktur keamanan.
> IT Security hanya fokus pada perbaikan infrastruktur.
> Kurangnya program kesadaran keamanan.
> Minimnya keterlibatan IT *Section* dalam proses pengembangan aplikasi baru.

> Limited investment in security infrastructure.
> IT Security only focuses on improving infrastructure.
> Lack of security awareness program.
> Lack of IT Section involvement in the process of developing new applications.

> Akan menerapkan secara aktif dan reguler VA dan pentester.
> Melakukan investasi untuk perbaikan infrastruktur.
> Peningkatan prosedur keamanan yg komprehensif dan sesuai dengan standar SOP keamanan yang sudah ditentukan.
> Akan melakukan program kesadaran keamanan yang terintegrasi dan terpadu serta melakukan penegakan kesadaran prosedur keamanan.
> *IT Section* akan dilibatkan dalam proses pengembangan aplikasi baru.

> Will actively and regularly implement VA and pentester.
> Investing in infrastructure improvement.
> Enhanced comprehensive security procedures and in accordance with the predetermined security SOP standards.
> IT Section will be involved in the process of developing new applications.

Penerapan Manajemen Risiko dalam Penggunaan Teknologi Informasi

Dalam menggunakan TI, Bank mengimplementasikan manajemen risiko melalui 4 (empat) aspek berikut:

Pengawasan Aktif Dewan Komisaris dan Direksi

Dalam melakukan pengawasan terhadap penggunaan TI, Dewan Komisaris dan Direksi Bank memiliki wewenang dan tanggung jawab sebagai berikut:

1. Dewan Komisaris bertugas dan berwenang untuk mengevaluasi, mengarahkan, dan memantau rencana strategis serta kebijakan Bank terkait penggunaan TI, termasuk menilai pertanggungjawaban Direksi atas penerapan manajemen risiko dalam penggunaan TI; dan
2. Direksi bertugas dan berwenang menetapkan rencana strategis, kebijakan, standar, dan prosedur penggunaan TI Bank; memastikan TI mendukung pertumbuhan bisnis dan tujuan perusahaan, serta kelangsungan pelayanan kepada nasabah; menyelenggarakan kegiatan peningkatan kompetensi sumber daya manusia terkait TI; menjamin keamanan informasi dengan sistem pengelolaan yang efektif; menerapkan manajemen risiko TI secara memadai; memastikan penerapan kebijakan TI secara efektif; dan menyediakan sistem pengukuran kinerja penyelenggaraan TI.

Selain itu, Bank juga membentuk Komite Teknologi Informasi untuk membantu Dewan Komisaris dan Direksi dalam memberikan rekomendasi terkait aspek tata kelola TI dan manajemen risiko penggunaan TI.

Kecukupan Kebijakan, Standar, dan Prosedur Penyelenggaraan Teknologi Informasi

Kebijakan, standar, dan prosedur penyelenggaraan TI di Bank Victoria disusun berdasarkan ketentuan Peraturan Otoritas Jasa Keuangan No. 11 Tahun 2022 tentang Penyelenggaraan Teknologi Informasi oleh Bank Umum dan Peraturan Otoritas Jasa Keuangan No. 21 Tahun 2023 mengenai Layanan Digital oleh Bank Umum. Kebijakan ini diterapkan secara konsisten dan terus ditinjau ulang untuk memastikan kesesuaiannya dengan perkembangan bisnis dan regulasi yang berlaku. Ruang lingkup kebijakan ini mencakup tata kelola TI, arsitektur TI, manajemen risiko penyelenggaraan TI, ketahanan dan keamanan siber, penggunaan pihak penyedia jasa TI, pengelolaan data dan perlindungan data pribadi, pengendalian dan audit intern TI Bank, pelaporan, dan penilaian tingkat maturitas digital Bank.

Kecukupan Proses Identifikasi, Pengukuran, Pemantauan, dan Pengendalian Risiko Penggunaan Teknologi Informasi

Proses identifikasi, pengukuran, pemantauan, dan pengendalian risiko dalam penggunaan TI di Bank Victoria dijalankan berdasarkan kebijakan manajemen risiko yang tertuang dalam Surat

Implementation of Risk Management in the Use of Information Technology

In using IT, the Bank implements risk management through the following 4 (four) aspects:

Active Monitoring of Board of Commissioners and Board of Directors

In supervising the use of IT, the Bank's Board of Commissioners and Board of Directors have the following authorities and responsibilities:

1. The Board of Commissioners has the duty and authority to evaluate, direct, and monitor the Bank's strategic plan and policies related to IT use, including to evaluate the Board of Directors' accountability for the implementation of risk management in IT use; and
2. The Board of Directors has the duty and authority to establish strategic plan, policies, standards, and procedures for the Bank's IT use; confirm that the IT supports the Company's business growth and objectives, as well as service continuity to customers; carry out activities to increase human capital competencies related to IT; guarantee information security with effective management system; implement adequate IT risk management; ensure effective implementation of IT policies; and provide performance measurement system of IT implementation.

In addition, the Bank also establishes an Information Technology Committee to assist the Board of Commissioners and Board of Directors in providing recommendations related to IT governance aspects and risk management in the use of IT.

Adequacy of Policies, Standards, and Procedures of Information Technology Implementation

Policies, standards, and procedures of the implementation of IT at Bank Victoria are prepared based on the provisions of Financial Services Authority Regulation No. 11 of 2022 on Information Technology Operations by Commercial Banks and Financial Services Authority Regulation No. 21 of 2023 on Digital Services by Commercial Banks. These policies are applied consistently and are constantly reviewed to ensure compliance with business developments and applicable regulations. The scope of these policies includes IT governance, IT architecture, risk management of IT implementation, cyber resilience and security, use of IT service providers, data management and personal data protection, internal control and audit of Bank's IT, reporting, and assessing the Bank's digital maturity level.

Adequacy of Risk Identification, Measurement, Monitoring, and Management Process of the Use of Information Technology

The process of identifying, measuring, monitoring, and controlling risks in the use of IT at Bank Victoria is carried out based on the risk management policy stated in the Board of Directors'

Keputusan Direksi No. 026/SK-DIR/01/24 tanggal 31 Januari 2024. Kebijakan ini dirancang untuk menjamin stabilitas dan kontinuitas operasional TI Bank, serta memitigasi risiko yang berpotensi mengganggu aktivitas operasional. Selain itu, langkah-langkah pengendalian diterapkan guna memastikan bahwa jaringan komunikasi yang digunakan oleh Bank selalu menjaga kerahasiaan, integritas, dan ketersediaan data di samping keamanan data tetap terjaga.

Sistem Pengendalian Internal Atas Penggunaan Teknologi Informasi

Bank Victoria menerapkan pengendalian internal yang ketat terhadap seluruh aspek penggunaan TI melalui audit rutin yang dilakukan oleh Divisi SKAI. Sepanjang tahun 2024, terdapat 8 (delapan) temuan terkait TI dengan tingkat risiko "*Low to Moderate*". Temuan-temuan ini mencakup berbagai aspek operasional TI, yang meliputi:

1. *Labelling Information*;
2. *Access Right*;
3. *Information Security Events*;
4. *Equipment Protection*;
5. *Clock Synchronization*;
6. *Operational Planning and Control*;
7. *Physical Entry*; dan
8. *Policies Security Monitoring.*

Tim TI Bank telah menindaklanjuti seluruh temuan tersebut guna memastikan kepatuhan terhadap kebijakan dan standar keamanan yang berlaku, serta mengurangi potensi gangguan yang dapat berdampak pada stabilitas operasional Bank. Langkah-langkah perbaikan yang dilakukan juga bertujuan untuk menjaga kelangsungan operasional secara efektif dan mencegah risiko serupa di masa mendatang.

Proses Tata Kelola Terkait Isu Teknologi Informasi

Bank Victoria menerapkan tata kelola yang komprehensif terkait penggunaan TI untuk memastikan bahwa semua risiko utama yang terkait dengan sistem TI, keamanan dunia maya, dan pemulihan bencana telah diidentifikasi, dikelola, dan dilaporkan secara transparan. Proses tata kelola TI dimulai dengan pengawasan aktif oleh Dewan Komisaris dan Direksi yang bertanggung jawab mengevaluasi kebijakan, prosedur, dan rencana strategis terkait pengelolaan TI. Dewan Komisaris dan Direksi memastikan bahwa kebijakan manajemen risiko TI selaras dengan tujuan bisnis Bank dan mendukung kelangsungan operasional.

Pengelolaan risiko TI mencakup identifikasi risiko utama, termasuk potensi gangguan sistem, ancaman keamanan siber, serta kesiapan dalam menghadapi bencana. Dalam hal keamanan siber, Bank Victoria menerapkan langkah-langkah proaktif untuk melindungi data sensitif dan memastikan sistem Bank tahan terhadap serangan dunia maya melalui audit internal dan eksternal secara berkala. Upaya mitigasi risiko dilakukan melalui penerapan sistem keamanan siber yang terintegrasi dengan menerapkan standar internasional seperti ISO 27001, yang memastikan bahwa Bank mampu melindungi integritas, kerahasiaan, dan ketersediaan data.

Decision Letter No. 026/SK-DIR/01/24 dated 31 January 2024. This policy is designed to ensure the stability and continuity of the Bank's IT operations, as well as mitigate risks that have the potential to disrupt operational activities. Furthermore, control measures are implemented to ensure that the communication network used by the Bank always maintains the confidentiality, integrity, and availability of data in addition to maintaining data security.

Internal Control System for the Use of Information Technology

Bank Victoria implements strict internal controls over all aspects of IT use through regular audits conducted by SKAI Division. Throughout 2024, there were 8 (eight) findings related to IT with a risk level of "Low to Moderate". These findings cover various aspects of IT operations, including:

1. Labelling Information;
2. Access Right;
3. Information Security Events;
4. Equipment Protection;
5. Clock Synchronization;
6. Operational Planning and Control;
7. Physical Entry; and
8. Policies Security Monitoring.

The Bank's IT team has followed up on all these findings to ensure the compliance with applicable security policies and standards, and to reduce potential disruptions that could impact the stability of the Bank's operations. The corrective measures taken also aim to maintain effective operational continuity and prevent similar risks in the future.

Governance Process Related to Information Technology Issues

Bank Victoria implements comprehensive governance related to IT use to ensure that all major risks related to IT systems, cybersecurity, and disaster recovery have been identified, managed, and reported transparently. The IT governance process begins with active supervision by the Board of Commissioners and Board of Directors who are responsible for evaluating policies, procedures, and strategic plans related to IT management. The Board of Commissioners and Board of Directors ensure that the policies of IT risk management are aligned with the Bank's business objectives and support operational continuity.

IT risk management includes identifying major risks, including potential system disruptions, cybersecurity threats, and disaster preparedness. In terms of cybersecurity, Bank Victoria applies proactive measures to protect sensitive data and ensure the Bank's systems are resilient to cyber attacks through regular internal and external audits. Risk mitigation efforts are carried out through the integrated cyber security system by implementing international standards such as ISO 27001, which ensures that the Bank is able to protect the integrity, confidentiality, and availability of data.

Bank juga memiliki rencana pemulihan bencana yang teruji, dengan tujuan memastikan kelangsungan operasional dalam kondisi darurat. Rencana ini mencakup pemulihan data, *backup* berkala, dan simulasi pemulihan bencana secara periodik untuk memastikan kesiapan Bank dalam menghadapi gangguan besar.

Proses pelaporan risiko TI dilakukan secara berkala kepada manajemen puncak dan regulator, memastikan bahwa setiap potensi gangguan atau ancaman dapat ditangani dengan segera. Dengan kerangka tata kelola yang kuat, Bank Victoria terus memantau dan menyesuaikan kebijakan TI agar tetap responsif terhadap dinamika ancaman teknologi yang terus berkembang.

The Bank also has a proven disaster recovery plan, with the aim of ensuring operational continuity in emergency conditions. This plan includes data recovery, periodic backups, and periodic disaster recovery simulations to ensure the Bank's readiness to face major disruptions.

The IT risk reporting process is carried out periodically to top management and regulators, ensuring that any potential disruptions or threats can be handled immediately. With a strong governance framework, Bank Victoria continuously monitors and adjusts IT policies to remain responsive to the evolving technological threats.

Pengembangan Teknologi Informasi Tahun 2024

Bank Victoria telah mengembangkan TI guna mendukung *customer experience*, meningkatkan kualitas layanan, serta mempererat hubungan dengan nasabah. Sepanjang tahun 2024, berbagai inisiatif pengembangan TI telah diimplementasikan, yaitu:

Information Technology Development in 2024

Bank Victoria has developed IT to support customer experience, improve service quality, and strengthen relationships with customers. Throughout 2024, various IT development initiatives were implemented, namely:

Tujuan Objectives	Bagian Penambahan Additional Part	Pelaksanaan Implementation
Revamp Internet Banking and Mobile Banking	*Revamp internet banking individual* dan *mobile banking* termasuk *digital onboarding* Revamp individual internet banking and mobile banking including digital onboarding	**Triwulan 1 2024** **Quarter 1 2024**
Liquidity Coverage Ratio & Net Stable Funding Ratio (LCR & NSFR)	Implementasi aplikasi pelaporan *liquidity coverage ratio & net stable funding ratio* Implementation of liquidity coverage ratio & net stable funding ratio reporting application	**Triwulan 1 2024** **Quarter 1 2024**
ATMR Risiko Pasar Market Risk RWA	Implementasi aplikasi pelaporan ATMR risiko pasar Implementation of market risk RWA reporting application	**Triwulan 1 2024** **Quarter 1 2024**
Single Sign On	Implementasi aplikasi *single sign on* Implementation of single sign on application	**Triwulan 1 2024** **Quarter 1 2024**
Mail Exchange	Penggantian sistem *mail exchange* Replacement of mail exchange system	**Triwulan 1 2024** **Quarter 1 2024**
Priviledge Access Management	Implementasi aplikasi *priviledge access management* Implementation of privilege access management application	**Triwulan 2 2024** **Quarter 2 2024**
Data Loss Prevention	Implementasi aplikasi *data loss prevention* Implementation of data loss prevention application	**Triwulan 3 2024** **Quarter 3 2024**
Call Center	Penggantian *call center system* Replacement of call center system	**Triwulan 3 2024** **Quarter 3 2024**
Migrasi *Disaster Recovery Center* Migration of Disaster Recovery Center	Migrasi *disaster recovery center* untuk *surrounding system* dari Gedung Fatmawati ke Gedung Bitera Migration of disaster recovery center for surrounding system from Fatmawati Building to Bitera Building	**Triwulan 4 2024** **Quarter 4 2024**

Bank Victoria juga secara konsisten telah menerapkan pengendalian dalam sistem manajemen keamanan informasi, yang dibuktikan dengan pencapaian Sertifikasi ISO 27001 terkait *Information Security*. Selain itu, pada tahun 2024, Bank juga berfokus pada pengembangan teknologi sistem informasi dan peningkatan infrastruktur yang mendukung kegiatan operasional, yaitu:

1. *Revamp internet banking* bisnis untuk meningkatkan fitur dan pengalaman pengguna;
2. *Digital operation*, yaitu layanan transaksi non-tunai nasabah melalui *video call* guna meningkatkan kenyamanan dan efisiensi layanan;

Bank Victoria has also consistently implemented controls in information security management system, as evidenced by the achievement of ISO 27001 Certification related to Information Security. Furthermore, in 2024, the Bank also focused on developing information system technology and improving infrastructure that supported operational activities, namely:

1. Revamp of business internet banking to improve features and user experience;
2. Digital operation, namely non-cash customer transaction services through video call to improve convenience and service efficiency;

3. *Peer to peer lending*, yaitu kerja sama dengan *digital lending ecosystems* untuk memperluas akses pembiayaan;
4. *Loan channelling* melalui *financial technology*, bank perkreditan rakyat, *multifinance*, dan koperasi sebagai bagian dari strategi ekspansi kredit;
5. Pengembangan *digital onboarding* via *microsite* agar dapat terkoneksi dengan berbagai *channel digital onboarding* yang bekerja sama dengan Bank;
6. Penggantian *treasury system* guna meningkatkan efisiensi dan akurasi dalam pengelolaan transaksi *treasury*; dan
7. Peningkatan dan pengkinian terhadap infrastruktur teknologi untuk memastikan keandalan sistem serta mendukung transformasi digital Bank.

Strategi Pengembangan Teknologi Informasi Tahun 2025

Untuk periode 2025-2027, Bank Victoria telah merancang strategi pengembangan TI guna meningkatkan layanan perbankan digital, memperluas ekosistem keuangan, dan meningkatkan keamanan serta efisiensi operasional. Strategi ini mencakup pengembangan layanan digital, infrastruktur TI, fitur perbankan elektronik, serta kerja sama dengan berbagai pihak, yang diuraikan sebagai berikut:

1. Pengembangan Layanan Digital dan Perbankan Elektronik:
    a. *Revamp Internet Banking Business & Cash Management (Phase I & II);*
    b. *Virtual Account (Phase I & II)*;
    c. QRIS *Customer Presented Mode* (CPM);
    d. QRIS *Merchant* (MPM *Acquirer*);
    e. QRIS *Cross Border* dan QRIS Tuntas;
    f. *BI-Fast* via *Internet Banking* dan *Mobile Banking*;
    g. Bank Persepsi via *Internet Banking* dan *Mobile Banking*;
    h. Kerja sama dengan *peer-to-peer lending/open* API untuk *digital lending ecosystem (Phase I & II);*
    i. Loan *Channeling* untuk perorangan dan perusahaan;
    j. Pembukaan Rekening *Qualitate Qua* (QQ); dan
    k. *Digital Onboarding* via *Microsite* untuk perorangan dan perusahaan.

2. Pengembangan Produk dan Layanan Keuangan Digital:
    a. Reksa Dana via Digital (fitur dari *revamp internet banking & mobile banking*);
    b. *Bancassurance Digital* dan kerja sama dengan rekanan asuransi untuk produk tradisional & non-tradisional via *digital channel* maupun *over the counter;*
    c. Kerja sama dengan aset manajemen untuk produk reksa dana yang dipasarkan via *internet banking, mobile banking*, dan *over the counter;*
    d. My Victoria (*platform digital* perbankan);
    e. *Digital Voucher* (Victoria Mart);
    f. *Website Marketing*;
    g. *Debit Acquirer* dan kerja sama mesin EDC; dan
    h. *Cashback & Engine Discount*.

3. Peer to peer lending, namely cooperation with digital lending ecosystems to expand access to financing;
4. Loan channeling through financial technology, rural banks, multifinance, and cooperatives as part of credit expansion strategies;
5. Development of digital onboarding via microsite in order to be connected to various digital onboarding channels that cooperate with the Bank;
6. Replacement of treasury system to improve efficiency and accuracy in managing treasury transactions; and
7. Improvement and updating of technology infrastructure to ensure system reliability and support the Bank's digital transformation.

Information Technology Development Strategy in 2025

For the 2025-2027 period, Bank Victoria has designed IT development strategies to improve digital banking services, expand financial ecosystem, and improve operational security and efficiency. These strategies include the development of digital services, IT infrastructure, electronic banking features, and cooperation with various parties, as described below:

1. Development of Digital Services and Electronic Banking:
    a. Revamp Internet Banking Business & Cash Management (Phase I & II);
    b. Virtual Account (Phase I & II);
    c. QRIS Customer Presented Mode (CPM);
    d. QRIS Merchant (MPM Acquirer);
    e. QRIS Cross Border and QRIS Tuntas;
    f. BI-Fast via Internet Banking and Mobile Banking;
    g. Collecting Bank via Internet Banking and Mobile Banking;
    h. Cooperation with peer-to-peer lending/open API for digital lending ecosystem (Phase I & II);
    i. Loan Channeling for individuals and companies;
    j. Opening of Qualitate Qua (QQ) Account; and
    k. Digital Onboarding via Microsite for individuals and companies.

2. Development of Digital Financial Products and Services:
    a. Mutual Funds via Digital (feature of revamp internet banking & mobile banking);
    b. Digital Bancassurance and cooperation with insurance partners for traditional & non-traditional products via digital channels and over the counter;
    c. Cooperation with asset management for mutual fund products marketed via internet banking, mobile banking, and over the counter;
    d. My Victoria (digital banking platform);
    e. Digital Voucher (Victoria Mart);
    f. Website Marketing;
    g. Debit Acquirer and EDC machine cooperation; and
    h. Cashback & Engine Discount.

3. Pengembangan Infrastruktur dan Keamanan Sistem TI:
   a. Penggantian *Treasury System*;
   b. Peningkatan dan pengkinian infrastruktur teknologi;
   c. Peningkatan *tools security* (*Security Information and Event Management*/SIEM);
   d. Pengembangan dan kerja sama BI *Standard National Open API Payment* (SNAP); dan
   e. Penambahan dan penggantian perangkat infrastruktur yang memasuki masa *obsolete*.
4. Pengembangan Layanan Digital dan Fitur Perbankan Elektronik:
   a. *Digital Operations* (layanan transaksi non-tunai via *video call – Phase* I, II & III);
   b. *Digital Form Transactions* (fitur dari *revamp internet banking & mobile banking via video banking*);
   c. *Microsite* Kredit Pemilikan Rumah (KPR);
   d. Kerja sama dengan prinsipal internasional (VISA/ MasterCard);
   e. Kerja sama dengan *startup* melalui *digital channel;*
   f. Fitur *Internet Banking & Mobile Banking*:
      - Victoria Mart;
      - *Cardless Withdrawal* (ATM, kantor cabang, minimarket, kantor pos);
      - *Bancassurance*;
      - Reksa Dana;
      - Sosial dan Keagamaan;
      - *Lifestyle* (Victoria Mart);
      - *Remittance*;
      - *Top Up eMoney* (Bank Mandiri);
      - *E-Wallet;*
      - *Point Reward*;
      - *Video Banking & Digital Operation*;
      - *Victoria Advertisement*;
      - *BI-Fast;* dan
      - Bank Persepsi.
5. Penambahan Fitur dan Kerja Sama Digital:
   a. Transfer ke Luar Negeri (*Remittance* melalui *startup*);
   b. *Subscribe* layanan berita *online* via *internet banking and mobile banking*;
   c. Akses karyawan untuk menarik upah per hari (kas bon);
   d. Pembelian produk olahraga dan obat-obatan secara *online* melalui Victoria Mobile;
   e. Penambahan kerja sama dengan yayasan sosial keagamaan via *internet banking and mobile banking*;
   f. *Join 'AND', Join 'OR'*, dan *QQ Account* via *internet banking and mobile banking;*
   g. *Cross Border Payment*;
   h. *Member Get Member Program*;
   i. Tabungan Berhadiah dan Tabungan Berjangka;
   j. QRIS Patungan;
   k. Setor Tunai Tanpa Kartu (*Cardless Cash Deposit*); dan
   l. *Cardless Withdrawal* via *Digital Channel.*

3. Development of IT System Infrastructure and Security:
   a. Replacement of Treasury System;
   b. Improvement and update of technology infrastructure;
   c. Improvement of security tools (Security Information and Event Management/SIEM);
   d. Development and cooperation of BI Standard National Open API Payment (SNAP); and
   e. Additional and replacement of infrastructure devices entering obsolete period.
4. Development of Digital Services and Electronic Banking Features:
   a. Digital Operations (non-cash transaction services via video call – Phase I, II & III);
   b. Digital Form Transactions (features of revamp internet banking & mobile banking via video banking);
   c. Home Ownership Loan (KPR) Microsite;
   d. Cooperation with international principals (VISA/ MasterCard);
   e. Cooperation with startup through digital channels;
   f. Internet Banking & Mobile Banking Features:
      - Victoria Mart;
      - Cardless Withdrawal (ATM, branch offices, minimarkets, post offices);
      - Bancassurance;
      - Mutual Funds;
      - Social and Religious;
      - Lifestyle (Victoria Mart);
      - Remittance;
      - Top Up eMoney (Bank Mandiri);
      - E-Wallet;
      - Point Reward;
      - Video Banking & Digital Operation;
      - Victoria Advertisement;
      - BI-Fast; and
      - Collecting Bank.
5. Additional Features and Digital Collaboration:
   a. Overseas Transfers (Remittance via startup);
   b. Subscribe to online news services via internet banking and mobile banking;
   c. Employee access to withdraw daily wages (cash advance);
   d. Online purchase of sport products and medicine via Victoria Mobile;
   e. Additional cooperation with social and religious foundations via internet banking and mobile banking;
   f. Join 'AND', Join 'OR', and QQ Account via internet banking and mobile banking;
   g. Cross Border Payment;
   h. Member Get Member Program;
   i. Savings with Prize and Term Savings;
   j. QRIS Split Bill;
   k. Cardless Cash Deposit; and
   l. Cardless Withdrawal via Digital Channel.





Tata Kelola Perusahaan
Good Corporate Governance



Dasar dan Prinsip Implementasi GCG

Basis and Principles of GCG Implementation

Tata kelola perusahaan yang baik (*good corporate governance*/GCG) merupakan prinsip-prinsip dasar yang mengarahkan pengelolaan perusahaan sesuai dengan peraturan perundang-undangan dan etika bisnis. Bank memahami pentingnya penerapan GCG tidak hanya untuk memenuhi regulasi, tetapi juga sebagai langkah strategis untuk meningkatkan kinerja dan daya saing berkelanjutan. Implementasi GCG dilakukan secara konsisten dengan penyesuaian kebijakan dan prosedur operasional yang mengikuti peraturan terbaru dan praktik terbaik industri. Pengelolaan Bank yang sesuai prinsip GCG ini mendukung kesehatan Bank, memperkuat kepercayaan publik, serta memberikan nilai tambah bagi investor dan pemangku kepentingan.

Dalam implementasi GCG, selain mengacu pada regulasi Otoritas Jasa Keuangan yang berlaku, Bank juga mengacu pada prinsip-prinsip dalam Pedoman Governansi Korporat Indonesia (PUGKI) 2021 beserta rekomendasi dan panduan di dalamnya yang dijiwai oleh 4 (empat) pilar governansi korporat, yaitu perilaku beretika, akuntabilitas, transparansi, dan keberlanjutan. Pilar governansi tersebut merupakan perkembangan terkini dari nilai dasar transparansi, akuntabilitas, responsibilitas, independensi, kewajaran, dan kesetaraan.

Good corporate governance (GCG) is the basic principles that guide the company management in line with laws and regulations and business ethics. The Bank understands the importance of implementing GCG not only to comply with regulations, but also as a strategic step to improve performance and sustainable competitiveness. GCG is implemented consistently with adjustments to operational policies and procedures that follow the latest regulations and industry best practices. The Bank management that is in line with GCG principles supports the Bank soundness, strengthens public trust, and provides added value for investors and stakeholders.

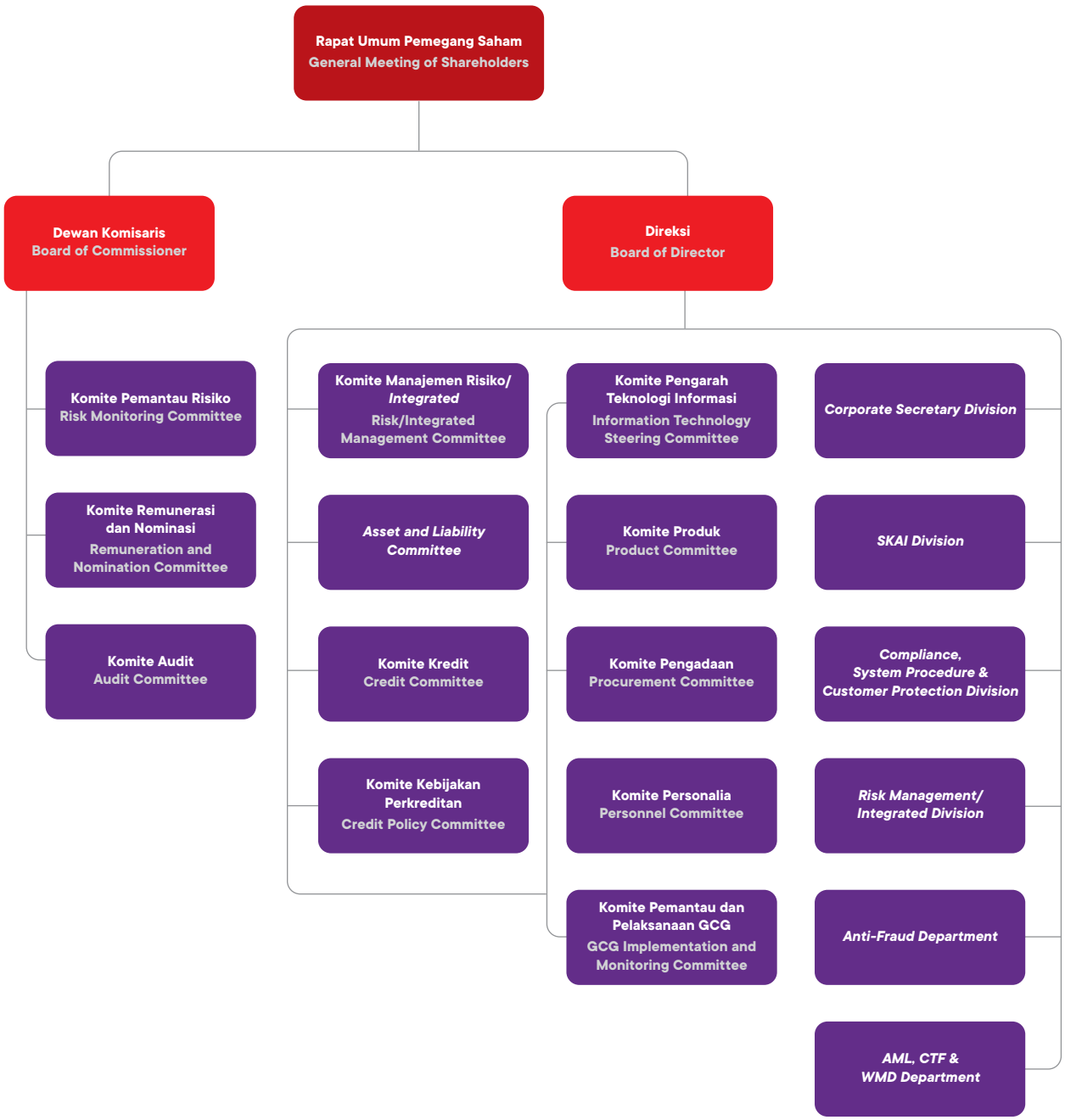
In implementing GCG, other than referring to the applicable Financial Services Authority regulations, the Bank also refers to the principles in the 2021 General Guidelines for Indonesian Corporate Governance (PUGKI) along with the recommendations and guidelines therein, which are inspired by the 4 (four) corporate governance pillars, namely ethical behavior, accountability, transparency, and sustainability. These governance pillars are the latest developments of basic values of transparency, accountability, responsibility, independence, and fairness and equality.

Pilar Governansi Governance Pillars	Implementasi Implementation
Perilaku Beretika **Ethical Conduct**	Bank senantiasa mengedepankan kejujuran, memperlakukan semua pihak dengan hormat, memenuhi komitmen, membangun serta menjaga nilai-nilai moral dan kepercayaan secara konsisten. Bank memperhatikan kepentingan Pemegang Saham dan pemangku kepentingan lainnya berdasarkan asas kewajaran dan kesetaraan dan dikelola secara independen sehingga masing-masing organ Bank tidak saling mendominasi dan tidak dapat diintervensi oleh pihak lain. The Bank always prioritizes honesty, treats all parties with respect, fulfills its commitments, as well as consistently builds and maintains moral values and beliefs. The Bank pays attention to the interests of Shareholders and other stakeholders based on the principle of fairness and equality, and each organ of the Bank is managed independently so that it does not dominate the other and cannot be intervened by other parties.
Akuntabilitas **Accountability**	Bank dapat mempertanggungjawabkan kinerja secara transparan dan wajar. Untuk itu Bank dikelola secara benar, terukur dan sesuai dengan kepentingan Bank dengan tetap memperhitungkan kepentingan Pemegang Saham dan pemangku kepentingan. Akuntabilitas merupakan prasyarat yang diperlukan untuk mencapai kinerja yang berkelanjutan. The Bank is accountable for its performance in a transparent and fair manner. For this reason, the Bank is managed properly, measurably, and in accordance with the Bank's interests, while still considering the interests of Shareholders and stakeholders. Accountability is the prerequisite needed to achieve the sustainable performance.
Transparansi **Transparency**	Bank menyediakan informasi yang material dan relevan dengan cara yang mudah diakses dan dipahami oleh pemangku kepentingan. Bank mengambil inisiatif untuk mengungkapkan tidak hanya masalah yang disyaratkan oleh peraturan perundang-undangan, tetapi juga hal yang penting untuk pengambilan keputusan oleh Pemegang Saham dan pemangku kepentingan lainnya. The Bank provides relevant material information that is easily accessible and understood by the stakeholders. The Bank takes the initiative to disclose not only issues required by laws and regulations, but also important matters for decision making by Shareholders and other stakeholders.
Keberlanjutan **Sustainability**	Bank mematuhi peraturan perundang-undangan serta berkomitmen melaksanakan tanggung jawab terhadap masyarakat dan lingkungan agar berkontribusi pada pembangunan berkelanjutan melalui kerja sama dengan semua pemangku kepentingan terkait untuk meningkatkan kehidupan mereka dengan cara yang selaras dengan kepentingan bisnis dan agenda pembangunan berkelanjutan. The Bank complies with the laws and regulations and is committed to carrying out its responsibilities towards community and environment in order to contribute to sustainable development by working with all relevant stakeholders to improve their lives aligned with the business interests and the sustainable development agenda.

Struktur GCG
GCG Structures

Bank telah menetapkan struktur GCG yang mencerminkan prinsip *check and balances* dalam penerapan GCG. Adapun struktur organisasi Bank Victoria yang menunjukkan Bank secara konsisten telah menerapkan GCG ditunjukkan sebagai berikut:

The Bank has established GCG structures that reflect the principle of check and balances in GCG implementation. The organizational structure of Bank Victoria which shows that the Bank has consistently implemented GCG is shown as follows:



Framework GCG

GCG Framework

Dalam rangka mendukung implementasi GCG yang efektif, Bank Victoria merancang *Corporate Governance Framework* yang komprehensif. Kerangka ini disusun dengan mengacu pada peraturan perundang-undangan yang berlaku, serta mempertimbangkan kondisi operasional, budaya organisasi, dan nilai-nilai inti Bank. Melalui *Corporate Governance Framework*, Bank Victoria memastikan penerapan GCG yang konsisten, mengintegrasikan GCG di seluruh aspek bisnis, serta menguatkan akuntabilitas, transparansi, dan etika dalam pengambilan keputusan. Skema dari *Corporate Governance Framework* Bank Victoria ditunjukkan sebagai berikut:

To support the effective GCG implementation, Bank Victoria has designed a comprehensive Corporate Governance Framework. This framework is prepared by referring to applicable laws and regulations, and considering operational conditions, organizational culture, and the Bank's core values. Through Corporate Governance Framework, Bank Victoria ensures consistent GCG implementation, integrates GCG across all business aspects, and strengthens accountability, transparency, and ethics in decision-making. The scheme of Bank Victoria's Corporate Governance Framework is presented as follows:



Peningkatan Kualitas Implementasi GCG

Improvement of GCG Implementation Quality

Mekanisme implementasi GCG di Bank dirancang berdasarkan praktik terbaik dalam industri perbankan, dengan fokus untuk mencapai *Good Corporate Sustainability*. Untuk memastikan implementasi GCG yang efektif dan terarah, Bank Victoria menerapkan beberapa langkah kunci sebagai berikut:

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

GCG implementation mechanism at the Bank is designed based on best practices in banking industry, with a focus on achieving Good Corporate Sustainability. To ensure the effective and targeted GCG implementation, Bank Victoria implements several key steps as follows:

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

Penilaian Penerapan GCG

Bank Victoria secara rutin melakukan penilaian penerapan GCG melalui penilaian mandiri (*self-assessment*) tahunan guna menilai tingkat kecukupan tata kelola di lingkungan internal. Penilaian ini dilaksanakan berdasarkan Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 dan Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tentang Penerapan Tata Kelola bagi Bank Umum, serta berbagai standar praktik terbaik yang berlaku di industri perbankan.

Tujuan dari *self-assessment* GCG adalah untuk mengidentifikasi kekuatan dan kelemahan dalam implementasi tata kelola perusahaan, yang dievaluasi berdasarkan 3 (tiga) aspek utama, yaitu *governance structure, governance process*, dan *governance outcome*. Adapun proses penilaian secara menyeluruh mencakup 11 (sebelas) faktor penilaian pelaksanaan tata kelola berikut:

1. Pelaksanaan tugas dan tanggung jawab Direksi;
2. Pelaksanaan tugas dan tanggung jawab Dewan Komisaris;
3. Kelengkapan dan pelaksanaan tugas Komite;
4. Penanganan benturan kepentingan;
5. Penerapan fungsi kepatuhan;
6. Penerapan fungsi Audit Internal;
7. Penerapan fungsi audit eksternal;
8. Penerapan manajemen risiko, termasuk sistem pengendalian internal;
9. Penyediaan dana kepada pihak terkait (*related party*) dan penyediaan dana besar (*large exposure*);
10. Transparansi kondisi keuangan dan non-keuangan Bank, laporan pelaksanaan GCG, dan pelaporan internal; dan
11. Rencana strategis Bank.

Sesuai dengan perkembangan regulasi yang berlaku, Bank Victoria telah menambahkan 5 (lima) aspek tambahan dalam pelaksanaan *self-assessment* GCG, sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023. Aspek-aspek tambahan tersebut meliputi aspek pemberian remunerasi, aspek Pemegang Saham,

Assessment of GCG Implementation

Bank Victoria regularly evaluates GCG implementation through annual self-assessment to evaluate the adequacy of internal governance. This assessment is carried out based on Financial Services Authority Regulation No. 17 of 2023 and Financial Services Authority Circular No. 13/SEOJK.03/2017 on Governance Implementation for Commercial Banks, as well as various standards for best practices applicable in banking industry.

The purpose of the GCG self-assessment is to identify strengths and weaknesses in corporate governance implementation, evaluated based on 3 (three) main aspects, namely governance structure, governance process, and governance outcome. The overall assessment process includes 11 (eleven) governance implementation assessment factors as follows:

1. Implementation of Board of Directors' duties and responsibilities;
2. Implementation of Board of Commissioners' duties and responsibilities;
3. Completeness and implementation of Committee's duties;
4. Management of conflict of interest;
5. Implementation of compliance function;
6. Implementation of Internal Audit function;
7. Implementation of external audit function;
8. Implementation of risk management including internal control system;
9. Provision of funds to related party and large exposure;
10. Transparency of the Bank's financial and non-financial condition, GCG implementation report, and internal reporting; and
11. The Bank's strategic plan.

In accordance with the development of the applicable regulations, Bank Victoria has incorporated 5 (five) additional aspects in implementing GCG self-assessment, as stipulated in Financial Services Authority Regulation No. 17 of 2023. These additional aspects include the remuneration aspect, Shareholders aspect, anti-fraud

penerapan strategi *anti-fraud*, penerapan keuangan berkelanjutan, serta penerapan tata kelola dalam kelompok usaha, baik dari sisi *governance structure*, *governance process*, dan *governance outcome*. Untuk tahun buku 2024, hasil *self-assessment* yang dilakukan Bank atas penerapan GCG diuraikan sebagai berikut:

strategy implementation, sustainable finance implementation, and governance implementation in business groups, including in terms of governance structure, governance process, and governance outcome. For the 2024 fiscal year, the results of the Bank's self-assessment on GCG implementation were described as follows:

Indikator Indicator	Peringkat Rating	Definisi Peringkat Rating Definition
Individu Individual	2	Baik Good

Skor penilaian *self-assessment* GCG tersebut, diperoleh berdasarkan analisis kesesuaian pelaksanaan penilaian sendiri GCG Bank Victoria secara individu dengan 3 (tiga) aspek, yaitu *governance structure*, *governance process*, dan *governance outcome* untuk setiap kriteria, serta tindak lanjutnya diuraikan sebagai berikut:

The GCG self-assessment score was obtained from the analysis of the suitability of Bank Victoria's individual GCG self-assessment with 3 (three) aspects, which are governance structure, governance process, and governance outcome for each of the criteria, and the follow-up is described as follows:

Kekuatan *(Strength)* Penerapan Tata Kelola Bank The Strength of the Bank's Governance Implementation	
Governance Structure	• Bank telah menjalankan struktur GCG sesuai dengan ketentuan Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Tata Kelola yang Baik. Kepatuhan ini tercermin dari kesesuaian komposisi anggota Direksi dan Dewan Komisaris, serta pembentukan komite-komite Bank (Komite di bawah Komisaris dan Direksi, termasuk Komite Non-Mandatori), guna memastikan penerapan GCG dalam seluruh kegiatan kegiatan Bank. • Dewan Komisaris telah melaksanakan tugas pengawasan dengan baik serta memberikan saran dan/atau arahan atas kebijakan Direksi dalam operasional Bank secara umum yang mengacu kepada rencana bisnis yang telah ditetapkan, serta memastikan kepatuhan terhadap seluruh peraturan perundang-undangan yang berlaku. Pelaksanaan tugas dan tanggung jawab Direksi serta Dewan Komisaris telah dipertanggungjawabkan dalam RUPS Tahunan yang diselenggarakan pada Juni 2024. • Direksi Bank telah menyusun, menetapkan mengevaluasi, dan memperbarui struktur organisasi dengan kejelasan tugas dan tanggung jawab terkait penerapan manajemen risiko, yang disesuaikan dengan perkembangan regulasi yang berlaku, antara lain pemisahan Unit *Anti-Fraud* dari Unit Internal Audit, serta pembentukan Tim Fungsi Perlindungan Konsumen guna memastikan kepatuhan terhadap regulasi serta penerapan GCG dan manajemen risiko. • Bank telah menerapkan prinsip 3 (tiga) lini pertahanan (*three lines of defense*) dalam sistem pengendalian internal. Setiap lini pertahanan memiliki tanggung jawab spesifik dalam manajemen dan pengendalian risiko guna memastikan efektivitas sistem pengelolaan risiko di seluruh aspek operasional Bank. • The Bank has implemented GCG structure in accordance with the provisions of Financial Services Authority Regulation No. 17 of 2023 on Good Governance. This compliance is reflected in the appropriate composition of the Board of Directors and Board of Commissioners, as well as the establishment of Bank committees (Committees under Board of Commissioners and Board of Directors, including Non-Mandatory Committees), to ensure the implementation of GCG in all Bank activities. • The Board of Commissioners has conducted its supervisory duties properly and provided advice and/or direction to the Board of Directors' policies in Bank operations in general, referring to the established business plans, and ensured compliance with all applicable laws and regulations. The implementation of duties and responsibilities of the Board of Directors and Board of Commissioners has been accounted for at the Annual GMS held in June 2024. • The Board of Directors of the Bank has prepared, established, evaluated, and updated the organizational structure with clear duties and responsibilities related to risk management implementation, adjusted to the development of applicable regulations, including the separation of Anti-Fraud Unit from the Internal Audit Unit, and the establishment of Consumer Protection Function Team to ensure the compliance with regulations, as well as GCG and risk management implementation. • The Bank has implemented the principle of 3 (three) lines of defense in its internal control system. Each line of defense has specific responsibilities in risk management and control to ensure the effectiveness of risk management system in all operational aspects of the Bank.
Governance Process	• Direksi telah melaksanakan tugas dan tanggung jawabnya sesuai dengan pedoman serta kewenangan yang tercantum dalam Anggaran Dasar. Dalam menjalankan perannya, termasuk upaya pencapaian target Rencana Bisnis Bank (RBB), Direksi berpedoman pada peraturan perundang-undangan, Anggaran Dasar, *Board of Directors Charter*, dan prinsip-prinsip GCG yang berlaku. Dengan demikian, Direksi memastikan kepatuhan terhadap prinsip kehati-hatian, ketentuan Batas Maksimum Pemberian Kredit (BMPK), ketentuan pihak terkait, serta aturan lain yang relevan. • Dewan Komisaris telah menjalankan fungsi pengawasan terhadap kinerja Direksi, baik melalui mekanisme rapat maupun berdasarkan masukan dari komite, memberikan saran dan/atau arahan secara tertulis. • Direktur yang membawahi kepatuhan telah memastikan kepatuhan Bank terhadap ketentuan yang berlaku. Pelaksanaan fungsi kepatuhan, manajemen risiko, internal audit, serta *anti-fraud* telah berjalan sesuai dengan pedoman internal serta peraturan perundang-undangan. Hal ini memastikan bahwa Satuan Kerja Manajemen Risiko, Satuan Kerja Kepatuhan, Unit AML CFT WMD, serta Unit *Anti-Fraud* menjalankan fungsinya secara independen dan objektif.

	• Bank telah melakukan sosialisasi sejumlah peraturan baru, resosialisasi peraturan yang diperlukan, serta pelaksanaan *Focus Group Discussion* (FGD) dengan unit kerja terkait. Selain itu, telah dilakukan *refreshment* bagi *Compliance Champion* sebagai *liaison officer* divisi dan/atau cabang yang bertugas membantu fungsi kepatuhan dalam sosialisasi peraturan dan kebijakan di masing-masing unit. Sosialisasi ini telah dilakukan setiap semester selama tahun 2024 dan dinilai cukup efektif dalam meningkatkan pemahaman karyawan terhadap regulasi dan/atau standar operasional prosedur yang berlaku. Keberhasilan ini tercermin dari hasil pemeriksaan Otoritas Jasa Keuangan Pengawas, di mana terjadi penurunan jumlah temuan dan/atau aspek yang perlu ditindaklanjuti oleh Bank. • The Board of Directors has conducted its duties and responsibilities in accordance with the guidelines and authorities stated in the Articles of Association. In performing its role, including the efforts to achieve the Bank's Business Plan (RBB) targets, the Board of Directors is guided by the laws and regulations, Articles of Association, Board of Directors Charter, and applicable GCG principles. Thus, the Board of Directors ensures its compliance with the principle of prudence, provision of Legal Lending Limit (LLL), provision of related parties, and other relevant regulations. • The Board of Commissioners has carried out its supervisory function on the Board of Directors' performance, either through meeting mechanism or based on input from the committee, in providing advice and/or direction in writing. • The Director in charge of compliance has ensured the Bank's compliance with the applicable regulations. The implementation of compliance function, risk management, internal audit, and anti-fraud has been carried out in accordance with internal guidelines and laws and regulations. This ensures that the Risk Management Unit, Compliance Unit, AML CTF WMD Unit, and Anti-Fraud Unit carry out their functions independently and objectively. • The Bank has disseminated a number of new regulations, re-disseminated the necessary regulations, and conducted Focus Group Discussions (FGD) with related units. In addition, refreshment has been provided for Compliance Champions as liaison officers of division and/or branch in charge of assisting compliance function in disseminating regulations and policies in each unit. This disseminations were carried out every semester throughout 2024 and were considered quite effective in increasing employee understanding of applicable regulations and/or standard operating procedures. This success is reflected in the results of Financial Services Authority Supervisory Audit, in which there was a decrease in the number of findings and/or aspects needed to be followed up by the Bank.
Governance Outcome	• Bank telah melakukan langkah-langkah perbaikan dan evaluasi secara berkesinambungan, yang tercermin dari hasil pemeriksaan Otoritas Jasa Keuangan periode tahun 2024. Hasil pemeriksaan tersebut menunjukkan perbaikan, antara lain dengan menurunnya temuan dari Otoritas Jasa Keuangan dibandingkan tahun sebelumnya serta terpenuhinya Komitmen Hasil Validasi *Self-Assessment* Perlindungan Konsumen dari Otoritas Jasa Keuangan *Market Conduct* pada Desember 2024. • Dewan Komisaris telah menjalankan tugas pengawasan dengan mengarahkan, memantau, dan mengevaluasi pelaksanaan kebijakan strategis Bank, termasuk melalui evaluasi RBB serta perencanaan revisi RBB. • Direksi telah melaksanakan tugas dan tanggung jawabnya dalam mengelola Bank sesuai dengan kewenangan yang diberikan melalui RUPS dan Anggaran Dasar Perusahaan secara bertanggung jawab. Hal ini dapat dilihat dari hasil Penilaian Sendiri Tingkat Kesehatan Bank pada Juni 2024, yang memperoleh peringkat 2 (dua) berdasarkan Surat Otoritas Jasa Keuangan No. SR-207/PB.32/2024 tanggal 26 Oktober 2024. • Dalam penerapan GCG, Bank telah menindaklanjuti regulasi terbaru dengan langkah-langkah berikut: › Menyusun *recovery plan* dan *resolution plan* sesuai dengan Peraturan Otoritas Jasa Keuangan No. 5 tahun 2024 tentang Penetapan Status Pengawasan dan Penanganan Permasalahan Bank Umum, serta Surat Lembaga Penjamin Simpanan No. S-231/DKRB/2024 tentang Kewajiban Penyusunan dan Penyampaian Rencana Resolusi Tahun 2024; › Membentuk Unit *Anti-Fraud* yang terpisah dari Satuan Kerja Audit Internal serta memperbarui Kebijakan dan Prosedur *Anti-Fraud* yang sesuai dengan Peraturan Otoritas Jasa Keuangan No. 12 Tahun 2024; › Melaporkan Publikasi Suku Bunga Dasar Kredit (SBDK) sesuai dengan Peraturan Otoritas Jasa Keuangan No. 13 tahun 2024; dan › Menunjuk Fungsi Integritas Pelaporan Keuangan Bank (ICOFR) serta membuat kebijakan dan prosedur sesuai dengan Peraturan Otoritas Jasa Keuangan No. 15 tahun 2024. • Bank memastikan bahwa prinsip *four eyes principles* dan/atau GCG diterapkan dalam seluruh tahapan proses kerja guna memitigasi potensi pelanggaran, serta terus membangun budaya kepatuhan di seluruh unit kerja. • The Bank has taken continuous improvement steps and evaluation, as reflected in the results of Financial Services Authority audit for the 2024 period. The audit results showed improvements, including a decrease in findings from the Financial Services Authority compared to the previous year, and the fulfillment of Consumer Protection Self-Assessment Validation Results Commitment from the Financial Services Authority Market Conduct in December 2024. • The Board of Commissioners has carried out its supervisory duties by directing, monitoring, and evaluating the implementation of the Bank's strategic policies, including through evaluating RBB and planning RBB revisions. • The Board of Directors has conducted its duties and responsibilities in managing the Bank responsibly in accordance with the authority granted through the GMS and the Company's Articles of Association. This can be seen from the results of the Bank's Sound Level Self-Assessment in June 2024, which received a rating of 2 (two) based on the Financial Services Authority Letter No. SR-207/PB.32/2024 dated 26 October 2024. • In implementing GCG, the Bank has followed up on the latest regulations with the following steps: › Preparing recovery plan and resolution plan according to the Financial Services Authority Regulation No. 5 of 2024 on Determination of Supervision Status and Handling of Commercial Bank Problems, as well as Deposit Insurance Agency Letter No. S-231/DKRB/2024 on Obligation to Prepare and Submit Resolution Plan for 2024; › Establishing Anti-Fraud Unit separated from the Internal Audit Unit and updating the Anti-Fraud Policy and Procedures in accordance with Financial Services Authority Regulation No. 12 of 2024; › Reporting the Publication of Prime Lending Rate (SBDK) in accordance with Financial Services Authority Regulation No. 13 of 2024; and › Appointing the Bank Financial Reporting Integrity Function (ICOFR) and establishing policies and procedures in accordance with Financial Services Authority Regulation No. 15 of 2024. • The Bank ensures that the four eyes principles and/or GCG are implemented in all stages of work process to mitigate potential violations, and to continue to build a culture of compliance across all work units.

Kelemahan (*Weakness*) Penerapan Tata Kelola Bank The Weakness of the Bank's Governance Implementation	
Governance Structure	Memperhatikan Risalah Rapat *Exit Meeting* PT Bank Victoria International Tbk posisi 30 Juni 2024 yang dilaksanakan pada 28 November 2024 oleh Pengawas Otoritas Jasa Keuangan, serta Risalah Rapat Validasi atas Laporan Hasil Penilaian Sendiri Tahun 2023 PT Bank Victoria International Tbk pada 12 September 2024 oleh Otoritas Jasa Keuangan *Market Conduct*, yang antara lain menyatakan bahwa Bank perlu memastikan seluruh proses operasional perbankan dijalankan secara konsisten sesuai dengan standar operasional prosedur yang berlaku. Oleh karena itu, Bank harus terus memberikan pelatihan secara berkesinambungan kepada seluruh sumber daya manusianya. With due regard to the Minutes of Exit Meeting of PT Bank Victoria International Tbk as of 30 June 2024, held on 28 November 2024 by the Financial Services Authority Supervisor, as well as the Minutes of Validation Meeting on the 2023 Self-Assessment Report of PT Bank Victoria International Tbk on 12 September 2024 by the Financial Services Authority Market Conduct, which among other things stating that the Bank needs to ensure that all of its banking operational processes are carried out consistently according to the applicable standard operating procedures. Therefore, the Bank must continue to provide continuous training to all of its human resources.
Governance Process	Pembentukan fungsi baru, yaitu Fungsi Integritas Pelaporan Keuangan Bank (ICOFR), yang dilekatkan pada fungsi yang sudah ada (Fungsi *Anti-Fraud*), masih dalam proses. Saat ini, Bank sedang melakukan rekrutmen personel dengan kompetensi yang sesuai, dengan target penyelesaian pada Mei 2025, merujuk pada Peraturan Otoritas Jasa Keuangan No. 15 Tahun 2024 tentang Integritas Pelaporan Keuangan Bank Pasal 20 Ayat 2. The establishment of new function, namely the Bank Financial Reporting Integrity Function (ICOFR), attached to the existing function (Anti-Fraud Function), is still in process. Currently, the Bank is recruiting personnel with appropriate competencies, with the target completion by May 2025, referring to Financial Services Authority Regulation No. 15 of 2024 on Integrity of Bank Financial Reporting Article 20 Paragraph 2.
Governance Outcome	• Bank menerima sanksi denda dari regulator atas pelanggaran ketentuan, terutama akibat ketidaktelitian dalam pelaporan. Hal ini disebabkan oleh *human error* dan/atau *inkonsistensi* dalam pelaksanaan transaksi sesuai dengan kebijakan dan/atau prosedur yang berlaku. • Beberapa kebijakan dan/atau prosedur perlu diperbarui, sehubungan dengan perubahan regulasi yang mendasarinya dan/atau telah mencapai tenggat waktu untuk ditinjau kembali. Pengkinian terhadap kebijakan dan/atau prosedur yang ada dilakukan secara bertahap sesuai dengan rencana kerja yang telah disusun, dengan mempertimbangkan keterbatasan sumber daya manusia yang tersedia. • The Bank receives fines from regulators for violation of provisions, particularly due to inaccuracy in reporting. This is due to human error and/or inconsistency in implementing transactions according to the applicable policies and/or procedures. • Several policies and/or procedures need to be updated, due to changes in the underlying regulations and/or due for review. Updating of existing policies and/or procedures is carried out in stages in accordance with the work plan prepared, with due observance of the limited human resources available.

Rekomendasi dan Tindak Lanjut Penilaian GCG

Berdasarkan hasil penilaian penerapan GCG Bank di tahun 2024 menghasilkan beberapa rekomendasi regulator yang perlu ditindaklanjuti, sebagaimana data sebagai berikut:

Recommendation and Follow-Up on GCG Assessment

The assessment results of the Bank's GCG implementation in 2024 resulted in several regulatory recommendations to be followed up, as shown in the following data:

Rekomendasi Recommendation	Tindak Lanjut Follow-up
Hasil pemeriksaan Otoritas Jasa Keuangan 2024 wajib ditindaklanjuti, terutama untuk temuan dengan target date yang telah ditetapkan, sesuai dengan komitmen Bank kepada Otoritas Jasa Keuangan. **Results of the 2024 Financial Services Authority audit must be followed up, particularly for findings with predetermined target date, in line with the Bank's commitment to the Financial Services Authority.**	Hasil pemeriksaan Otoritas Jasa Keuangan tahun 2023 telah seluruhnya telah ditindaklanjuti sesuai target date 2024. Results of the 2023 Financial Services Authority audit have been followed up completely following the 2024 target date.
Penyampaian laporan wajib menerapkan prinsip yang lengkap, akurat, dan tepat waktu. **Submission of report must apply the complete, accurate, and on time principles.**	Bank telah menerapkan prinsip lengkap, akurat, dan tepat waktu dalam pengiriman laporan dengan menerapkan *four eyes principles.* The Bank has applied the complete, accurate, and on time principles in the submission of report by applying the four eyes principles.

Rapat Umum Pemegang Saham
General Meeting of Shareholders

Rapat Umum Pemegang Saham (RUPS) merupakan organ tertinggi dalam struktur tata kelola Bank. RUPS memiliki wewenang yang tidak diberikan kepada Dewan Komisaris atau Direksi sebagaimana diatur dalam peraturan perundang-undangan yang berlaku dan/atau Anggaran Dasar Bank. Bank melaksanakan RUPS Tahunan 1 (satu) kali setiap tahun, dan RUPS Luar Biasa yang dapat diselenggarakan sewaktu-waktu berdasarkan kebutuhan.

The General Meeting of Shareholders (GMS) is the highest organ in the Bank's governance structure. The GMS has authority not given to the Board of Commissioners or Board of Directors as stipulated in the applicable laws and/or the Bank's Articles of Association. The Bank holds Annual GMS once a year and Extraordinary GMS at any time as necessary.

Informasi Mengenai Keputusan RUPS Tahun 2024

Pada tahun 2024, Bank telah menyelenggarakan 1 (satu) kali RUPS Tahunan dan tidak menyelenggarakan RUPS Luar Biasa. Informasi terkait penyelenggaraan RUPS Tahunan diungkapkan sebagai berikut:

Information on the 2024 GMS Resolutions

In 2024, the Bank held 1 (one) Annual GMS and did not hold any Extraordinary GMS. Information related to Annual GMS implementation is disclosed as follows:

RUPS Tahunan 14 Juni 2024
Annual GMS 14 June 2024

Hari/Tanggal **Day/Date**	Jumat, 14 Juni 2024 Friday, 14 June 2024
Waktu **Time**	09.30-10.55 WIB
Tempat **Place**	Graha BIP, Function Hall Lantai 11 Jl. Gatot Subroto Kav. 23 Jakarta Selatan / South Jakarta 12930
Kehadiran Dewan Komisaris **Attendance of Board of Commissioners**	Komisaris Utama Independen : Zaenal Abidin Ph.D Komisaris Independen : Gunawan Tenggarahardja Komisaris : Sia Leng Ho Independent President Commissioner : Zaenal Abidin Ph.D Independent Commissioner : Gunawan Tenggarahardja Commissioner : Sia Leng Ho
Kehadiran Direksi **Attendance of Board of Directors**	Direktur Utama : Achmad Friscantono Wakil Direktur Utama : Rusli Direktur : Lembing Direktur : Debora Wahjutirto Tanoyo Direktur Kepatuhan dan Manajemen Risiko : Tamunan President Director : Achmad Friscantono Deputy President Director : Rusli Director : Lembing Director : Debora Wahjutirto Tanoyo Director of Compliance and Risk Management : Tamunan
Pemegang Saham **Shareholders**	RUPS dihadiri oleh Pemegang Saham yang mewakili 13.456.162.514 saham atau 84,90% dari seluruh saham dengan hak suara yang sah yang telah dikeluarkan oleh Bank. The GMS was attended by Shareholders representing 13,456,162,514 shares or 84.90% of all shares with valid voting rights issued by the Bank.
Penunjukan Pihak Independen dalam RUPS Tahunan **Appointment of Independent Party at the Annual GMS**	Bank telah menunjuk pihak independen yaitu Notaris Fathiah Helmi, SH, Biro Administrasi Efek yaitu PT Adimitra Jasa Korpora, dan Kantor Akuntan Publik Purwantono, Sungkoro & Surja untuk melakukan proses penghitungan suara dan/atau melakukan validasi. The Bank has appointed independent parties, namely Notary Fathiah Helmi, SH, Share Registrar Bureau PT Adimitra Jasa Korpora, and Public Accounting Firm Purwantono, Sungkoro & Surja to count and/or validate votes.

Hasil Keputusan RUPS Tahunan 14 Juni 2024
Resolutions of Annual GMS 14 June 2024

Keputusan Resolutions	Realisasi Realization	Pengambilan Suara Voting
Menyetujui Laporan Tahunan Perseroan termasuk Laporan Direksi, pengesahan Laporan Keuangan Tahunan, serta Laporan Tugas Pengawasan Dewan Komisaris pada tanggal 31 Desember 2023. Approved the Company's Annual Report including the Board of Directors' Report, validation of the Annual Financial Statements, as well as the Board of Commissioners' Supervisory Report on 31 December 2023.	Telah direalisasikan sepenuhnya. Fully realized.	Setuju : 13.453.220.214 saham Tidak Setuju : - Abstain : 2.942. 300 saham Agree : 13,453,220,214 shares Disagree : - Abstain : 2,942,300 shares
Menyetujui penetapan penggunaan laba bersih Bank untuk tahun buku yang berakhir pada tanggal 31 Desember 2023. Approved the determination of the use of the Bank's net income for the fiscal year ending 31 December 2023.	Telah direalisasikan sepenuhnya. Fully realized.	Setuju : 13.453.220.214 saham Tidak Setuju : - Abstain : 2.942. 300 saham Agree : 13,453,220,214 shares Disagree : - Abstain : 2,942,300 shares
Menyetujui pemberian kuasa dan wewenang kepada wakil Pemegang Saham untuk menetapkan besarnya honorarium anggota Dewan Komisaris serta memberi kuasa dan wewenang kepada Dewan Komisaris untuk menetapkan pembagian tugas dan wewenang anggota Direksi serta besarnya gaji dan tunjangan para anggota Direksi. Approved to grant power and authority to representatives of Shareholders to determine the honorarium amount for members of the Board of Commissioners and to grant power and authority to the Board of Commissioners to determine the division of duties and authorities of members of the Board of Directors and the amount of salary and allowances for members of the Board of Directors.	Telah direalisasikan sepenuhnya. Fully realized.	Setuju : 13.452.916.214 saham Tidak Setuju : 304.000 saham Abstain : 2.942. 300 saham Agree : 13,452,916,214 shares Disagree : 304,000 shares Abstain : 2,942,300 shares
Menyetujui menunjuk akuntan publik untuk mengaudit Laporan Keuangan Bank untuk tahun buku 2024 dan memberikan kuasa kepada Dewan Komisaris untuk menetapkan honorarium akuntan publik tersebut serta persyaratan lain penunjukannya. Approved to appoint a public accountant to audit the Bank's Financial Statements for the 2024 fiscal year and granted authorities to the Board of Commissioners to determine the honorarium for public accountant and other requirements for the appointment.	Telah direalisasikan sepenuhnya. Fully realized.	Setuju : 13.453.220.214 saham Tidak Setuju : - Abstain : 2.942. 300 saham Agree : 13,453,220,214 shares Disagree : - Abstain : 2,942,300 shares
Menyetujui pembatalan perubahan pengurus yang telah diputuskan pada RUPS Tahunan Perseroan tanggal 26 Mei 2023. Approved to cancel the changes to the management resolved at the Company's Annual GMS on 26 May 2023.	Telah direalisasikan sepenuhnya. Fully realized.	Setuju : 13.453.216.214 saham Tidak Setuju : - Abstain : 2.946. 300 saham Agree : 13,453,216,214 shares Disagree : - Abstain : 2,946,300 shares
Menyetujui Laporan Realisasi Penggunaan Dana Hasil *Exercise* Waran Seri VII. Approved the Report on the Realization of the Use of Proceeds from Exercise of Series VII Warrants.	Telah direalisasikan sepenuhnya. Fully realized.	Tidak dilakukan pengambilan keputusan karena agenda bersifat laporan. No resolution was adopted due to this agenda item only referred to a report.
Menyetujui perubahan Anggaran Dasar Perseroan di antaranya dalam rangka penyesuaian atas diterbitkannya Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023. Approved the amendment to the Company's Articles of Association, including in order to comply with the issuance of Financial Services Authority Regulation No. 17 of 2023.	Telah direalisasikan sepenuhnya. Fully realized.	Setuju : 13.453.216.214 saham Tidak Setuju : 4.000 saham Abstain : 2.942. 300 saham Agree : 13,453,216,214 shares Disagree : 4,000 shares Abstain : 2,942,300 shares

Informasi dan Realisasi Mengenai Keputusan RUPS Tahunan 2023

Pada tahun 2023, Bank telah menyelenggarakan 1 (satu) kali RUPS Tahunan pada 26 Mei 2023 dan tidak menyelenggarakan RUPS Luar Biasa. RUPS dilaksanakan di Graha BIP, Function Hall Lantai 11, Jl. Gatot Subroto Kav. 23, Jakarta Selatan 12930. Pengambilan keputusan dalam RUPS dilakukan dengan cara musyawarah untuk mufakat, apabila musyawarah untuk mufakat tidak tercapai, maka dilakukan pemungutan suara. Adapun pihak independen yang ditunjuk untuk melakukan perhitungan suara adalah Biro Administrasi Efek dan Notaris.

Keputusan RUPS Tahunan 2023 beserta realisasinya diuraikan sebagai berikut:

Information and Realization of the 2023 Annual GMS Resolutions

In 2023, the Bank held 1 (one) Annual GMS on 26 May 2023 and did not hold any Extraordinary GMS. The GMS was held at Graha BIP, Function Hall, 11th Floor, Jl. Gatot Subroto Kav. 23, South Jakarta 12930. Resolution adoption in the GMS is conducted by way of deliberation to reach consensus, in the event deliberation to reach the consensus is not reached, then voting is conducted. The independent parties appointed to count the votes are the Share Registrar Bureau and Notary.

The 2023 Annual GMS resolutions and their realization are outlined as follows:

Keputusan Resolutions	Realisasi Realization
Menyetujui Laporan Tahunan Perseroan termasuk Laporan Direksi, pengesahan Laporan Keuangan Tahunan, serta Laporan Tugas Pengawasan Dewan Komisaris pada tanggal 31 Desember 2022. Approved the Company's Annual Report including the Board of Directors' Report, validation of the Annual Financial Statements, as well as the Board of Commissioners' Supervisory Report on 31 December 2022.	Telah direalisasikan sepenuhnya. Fully realized.
Menyetujui penetapan penggunaan laba bersih Bank untuk tahun buku yang berakhir pada tanggal 31 Desember 2022. Approved the determination of the use of the Bank's net income for the fiscal year ending 31 December 2022.	Telah direalisasikan sepenuhnya. Fully realized.
Menyetujui pemberian kuasa dan wewenang kepada wakil Pemegang Saham untuk menetapkan besarnya honorarium anggota Dewan Komisaris serta memberi kuasa dan wewenang kepada Dewan Komisaris untuk menetapkan pembagian tugas dan wewenang anggota Direksi serta besarnya gaji dan tunjangan para anggota Direksi. Approved to grant power and authority to representatives of Shareholders to determine the honorarium amount for members of the Board of Commissioners and to grant power and authority to the Board of Commissioners to determine the division of duties and authorities of members of the Board of Directors and the amount of salary and allowances for members of the Board of Directors.	Telah direalisasikan sepenuhnya. Fully realized.
Menyetujui menunjuk akuntan publik untuk mengaudit Laporan Keuangan Bank untuk tahun buku 2023 dan memberikan kuasa kepada Dewan Komisaris untuk menetapkan honorarium akuntan publik tersebut serta persyaratan lain penunjukannya. Approved to appoint a public accountant to audit the Bank's Financial Statements for the 2023 fiscal year and granted authorities to the Board of Commissioners to determine the honorarium for a public accountant and other requirements for the appointment.	Telah direalisasikan sepenuhnya. Fully realized.
Menyetujui perubahan Pasal 17 ayat (9) huruf b dan Pasal 23 ayat (5) Anggaran Dasar Perseroan. Approved the amendments to Article 17 paragraph (9) letter b and Article 23 paragraph (5) of the Company's Articles of Association.	Telah direalisasikan sepenuhnya. Fully realized.
Menyetujui Laporan Realisasi Penggunaan Dana Penambahan Modal dengan Memberikan Hak Memesan Efek Terlebih Dahulu VI, Penambahan Modal dengan Memberikan Hak Memesan Efek Terlebih Dahulu VII, dan Penawaran Umum Berkelanjutan Obligasi III tahap I Tahun 2023. Approved the Report on the Realization of the Use of Proceeds from Capital Increase with Pre-emptive Rights VI, Capital Increase with Pre-emptive Rights VII, and Continuous Public Offering of Bonds III phase I Year 2023.	Telah direalisasikan sepenuhnya. Fully realized.
Menyetujui perubahan susunan pengurus Perseroan. Approved changes to the composition of the Company's management.	Telah direalisasikan sepenuhnya. Fully realized.

Dewan Komisaris
Board of Commissioners

Dewan Komisaris merupakan organ Bank yang menjalankan tugas dan tanggung jawab untuk mengawasi dan memberikan nasihat kepada Direksi, serta memastikan Bank telah menerapkan GCG secara menyeluruh.

The Board of Commissioners is the Bank's organ that carries out duties and responsibilities to supervise and provide advices to the Board of Directors and ensures that the Bank has implemented GCG comprehensively.

Pedoman Dewan Komisaris

Pedoman kerja Dewan Komisaris tertuang dalam *Board of Commissioners Charter* (*BOC Charter*) yang telah dimutakhirkan berdasarkan Keputusan Dewan Komisaris No. 001/SK-KOM/12/23 tanggal 6 Desember 2023.

Board of Commissioners Charter

The Board of Commissioners' work guideline is set out in the Board of Commissioners Charter (BOC Charter) which has been updated based on Board of Commissioners' Decision No. 001/SK-KOM/12/23 dated 6 December 2023.

Ruang Lingkup Pekerjaan dan Tanggung Jawab Masing-Masing Anggota Dewan Komisaris

Ruang lingkup tugas dan tanggung jawab masing-masing anggota Dewan Komisaris berdasarkan Keputusan Dewan Komisaris No. 002/SK-KOM/10/24 tanggal 2 Oktober 2024 tentang Pembagian Tugas dan Wewenang Anggota *Board of Commissioners*, diuraikan sebagai berikut:

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

The scope of duties and responsibilities of each member of the Board of Commissioners, based on the Board of Commissioners' Decision No. 002/SK-KOM/10/24 dated 2 October 2024 on Distribution of Duties and Authorities of the Board of Commissioners' Members, is described as follows:

Nama dan Jabatan Name and Position	Tugas dan Tanggung Jawab Duties and Responsibilities	
Zaenal Abidin Ph.D Komisaris Utama Independen Independent President Commissioner	• Melakukan koordinasi dan memberikan pengarahan kepada anggota Dewan Komisaris; • Mengoordinasikan pengawasan yang dilakukan oleh anggota Dewan Komisaris sesuai dengan bidangnya masing-masing; • Menyelenggarakan dan memimpin: › Rapat internal Dewan Komisaris; dan › Rapat gabungan Dewan Komisaris dan Direksi guna membahas dan mengevaluasi perkembangan laporan kinerja Direksi; • Melakukan pengawasan kegiatan pada bidang-bidang: › *Good Corporate Governance*; › *Compliance, System Procedure & Customer Protection;* › *Risk Management/Integrated;* › *SKAI;* › *Anti-Fraud;* dan › *AML, CTF & WMD*; • Melakukan pengawasan kegiatan bidang Internal Audit; • Memberikan tugas lain kepada anggota Dewan Komisaris; • Membuat konsep memorandum kepada Direksi berkaitan dengan pengawasan dan pembinaan bidangnya; • Mengambil alih tugas Komisaris lainnya apabila yang bersangkutan berhalangan; serta • Memimpin rapat gabungan antara Direksi dan Dewan Komisaris.	• Coordinating and providing direction to the Board of Commissioners' members; • Coordinating the supervision carried out by the Board of Commissioners' members according to their respective fields; • Organizing and leading: › Board of Commissioners internal meeting; and › Joint meetings of the Board of Commissioners and Board of Directors to discuss and evaluate the progress of the Board of Directors' performance reports; • Supervising activities in the following areas: › Good Corporate Governance; › Compliance, System Procedure & Customer Protection; › Risk Management/Integrated; › SKAI; › Anti-Fraud; and › AML, CTF & WMD; • Supervising activities in Internal Audit areas; • Giving other duties to the Board of Commissioners' members; • Creating a draft of memorandum to the Board of Directors relating to the field supervision and development; • Taking over the duties of other Commissioners in the event the person concerned is absent; and • Leading joint meetings between the Board of Directors and Board of Commissioners.

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

Wewenang Dewan Komisaris

Wewenang Dewan Komisaris Bank dalam menjalankan tugas dan tanggung jawabnya diuraikan sebagai berikut:

1. Dewan Komisaris dengan suara terbanyak setiap waktu berhak memberhentikan untuk sementara waktu seorang atau lebih anggota Direksi, jika bertindak bertentangan dengan Anggaran Dasar serta peraturan lainnya atau melalaikan kewajibannya atau terdapat alasan yang mendesak bagi Bank, termasuk dalam hal Direksi sakit dan tidak dapat menjalankan tugas. Dalam jangka waktu paling lambat 30 hari setelah tanggal pemberhentian sementara harus diselenggarakan RUPS;
2. Dalam hal jabatan salah seorang anggota Direksi kosong, baik mengundurkan diri maupun diberhentikan dan penggantinya belum ada atau belum memangku jabatannya, maka Dewan Komisaris berwenang menunjuk salah seorang anggota Direksi untuk menjalankan pekerjaan anggota Direksi lainnya yang kosong tersebut dengan kekuasaan dan wewenang yang sama dan Direktur tersebut dapat bertindak untuk dan atas nama Direksi serta menunjuk pihak lain untuk mewakili Bank dalam hal terjadi benturan kepentingan Bank dengan kepentingan semua anggota Direksi;

Authority of the Board of Commissioners

The authority of the Bank's Board of Commissioners in performing its duties and responsibilities is described as follows:

1. The Board of Commissioners with the most vote, at all times, has the rights to suspend one or more members of the Board of Directors, if acting on the contrary to the Articles of Association and other regulations or neglecting the obligations or there is an urgent reason for the Bank, including in the case of the Board of Directors being sick and unable to perform the duties. Within the period of no more than 30 days after the suspension date, a GMS must be held;
2. In the event that one position of Board of Directors is vacant, either due to resignation or dismissal, and no successor available or has assumed the position, the Board of Commissioners is authorized to appoint a member of the Board of Directors to carry out the work of the other vacant position of the Board of Directors with equal power and authority, and this Director may act for and on behalf of the Board of Directors and appoint other party to represent the Bank in the event of a conflict of interest of the Bank with the interest of all members of the Board of Directors;

3. Menetapkan komposisi Direksi berdasarkan kewenangan yang dilimpahkan oleh RUPS;
4. Mendapatkan informasi dari Direksi Entitas Anak terkait dengan kondisi Entitas Anak; dan
5. Menyetujui atau menolak secara tertulis tindakan-tindakan yang dilakukan Direksi seperti yang tercantum dalam *BOC Charter.*

3. Determining the composition of the Board of Directors based on the authority delegated by the GMS;
4. Obtaining information from the Board of Directors of a Subsidiary related to the Subsidiary condition; and
5. Approving or rejecting in writing the actions of the Board of Directors as stated in the BOC Charter.

Jumlah, Komposisi, dan Independensi Dewan Komisaris

Jumlah dan Komposisi

Bank wajib memiliki anggota Dewan Komisaris paling sedikit 3 (tiga) orang anggota yang diangkat oleh RUPS untuk jangka waktu 3 (tiga) tahun serta dapat diangkat kembali untuk periode berikutnya. Berikut komposisi Dewan Komisaris Bank pada tahun 2024:

Number, Composition, and Independence of the Board of Commissioners

Number and Composition

The Bank shall have at least 3 (three) members of Board of Commissioners, appointed by the GMS for a period of 3 (three) years and can be reappointed for the following period. The following is the composition of the Bank's Board of Commissioners in 2024:

Nama Name	Jabatan Position	Dasar Hukum Pengangkatan dan Masa Jabatan Legal Basis of Appointment and Term of Office
Zaenal Abidin Ph.D	Komisaris Utama Independen Independent President Commissioner	Keputusan RUPS Tahunan tanggal 3 Juni 2022 (2022-2025). Annual GMS Resolution dated 3 June 2022 (2022-2025).
Gunawan Tenggarahardja	Komisaris Independen Independent Commissioner	Keputusan RUPS Tahunan tanggal 3 Juni 2022 (2022-2025). Annual GMS Resolution dated 3 June 2022 (2022-2025).
Sia Leng Ho	Komisaris Commissioner	Keputusan RUPS Luar Biasa tanggal 10 Agustus 2022 (2022-2025). Extraordinary GMS Resolutions dated 10 August 2022 (2022-2025).

Independensi

Seluruh anggota Dewan Komisaris senantiasa mengedepankan prinsip independensi dalam setiap pelaksanaan tugas dan tanggung jawabnya demi menjamin tidak terjadinya hal-hal yang berpotensi menimbulkan benturan kepentingan dan kerugian bagi Bank.

Independence

All members of the Board of Commissioners always prioritize independence principle in every implementation of their duties and responsibilities to ensure that there are no potential conflicts of interest nor losses for the Bank.

Penilaian Kemampuan dan Kepatutan Dewan Komisaris

Pada tahun 2024, seluruh anggota Dewan Komisaris Bank telah memenuhi syarat dan lulus uji kemampuan serta kepatutan sebagaimana yang disyaratkan dalam Peraturan Otoritas Jasa Keuangan No. 27/POJK.03/2016 tentang Penilaian Kemampuan dan Kepatutan Pihak Utama Lembaga Jasa Keuangan. Informasi tersebut telah disampaikan dalam profil masing-masing anggota Dewan Komisaris pada bab Profil Perusahaan.

Fit and Proper Test for the Board of Commissioners

In 2024, all members of the Bank's Board of Commissioners fulfilled the requirements and passed the fit and proper test as required in the Financial Services Authority Regulation No. 27/POJK.03/2016 on the Fit and Proper Test for Key Parties of Financial Services Institutions. This information is presented in the profile of each Board of Commissioners' member in the Company Profile chapter.

Komisaris Independen

Sesuai ketentuan Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum, minimal 50% dari anggota Dewan Komisaris adalah Komisaris Independen. Pada tahun 2024, Bank memiliki 2 (dua) Komisaris Independen atau 66,67% dari

Independent Commissioner

Pursuant to the Financial Services Authority Regulation No. 17 of 2023 on Governance Implementation for Commercial Banks, the Board of Commissioners shall have at least 50% members of Independent Commissioners. In 2024, the Bank had

total 3 (tiga) anggota Dewan Komisaris. Seluruh anggota Komisaris Independen telah memenuhi persyaratan sebagai berikut:

1. Bukan merupakan orang yang bekerja atau mempunyai wewenang dan tanggung jawab untuk merencanakan, memimpin, mengendalikan, atau mengawasi kegiatan Bank dalam waktu 6 (enam) bulan terakhir, kecuali untuk pengangkatan kembali sebagai Komisaris Independen Bank pada periode berikutnya;
2. Tidak mempunyai saham baik langsung maupun tidak langsung pada Bank;
3. Tidak mempunyai hubungan afiliasi dengan Bank, anggota Dewan Komisaris, anggota Direksi atau Pemegang Saham Utama Bank; dan
4. Tidak mempunyai hubungan usaha baik langsung maupun tidak langsung yang berkaitan dengan kegiatan usaha Bank tersebut.

Pernyataan Independensi

Komisaris Independen Bank telah menandatangani Surat Pernyataan Independensi dan lulus uji kemampuan dan kepatutan sebagai Komisaris Independen, sesuai dengan ketentuan yang ditetapkan oleh Otoritas Jasa Keuangan.

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

1. Not being employed nor having the authority and responsibility to plan, lead, control, or supervise the Bank's activities within the last 6 (six) months, except for reappointment as the Bank's Independent Commissioner in the next period;
2. Not possessing any shares in the Bank, either directly or indirectly;
3. Not having affiliation relationship with the Bank, members of Board of Commissioners, members of Board of Directors, or the Bank's Main Shareholders; and
4. Not having business relationship, either directly or indirectly, that are related to the Bank's business activities.

Statement of Independency

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

Rapat Dewan Komisaris

Kebijakan Rapat Dewan Komisaris

Selain keharusan untuk menghadiri RUPS, Dewan Komisaris juga wajib mengadakan rapat internal paling sedikit 1 (satu) kali dalam 2 (dua) bulan dan rapat dengan Direksi paling sedikit 1 (satu) kali dalam 4 (empat) bulan. Teknis pelaksanaan rapat dapat dilakukan secara langsung maupun secara *teleconference* dengan tetap memperhatikan keabsahan pengambilan keputusan.

Frekuensi Kehadiran Rapat Dewan Komisaris [G-02]

Selama tahun 2024, Dewan Komisaris telah melaksanakan rapat dengan rincian kehadiran masing-masing anggota sebagai berikut:

Board of Commissioners' Meetings

Board of Commissioners' Meeting Policy

In addition to the requirement to attend the GMS, the Board of Commissioners is also required to hold internal meetings at least once every 2 (two) months and meetings with the Board of Directors at least once every 4 (four) months. Technically, the meeting can be conducted in person or via teleconference while still considering the validity of decision making.

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

Throughout 2024, the Board of Commissioners held meetings with details of each member's attendance as follows:

Nama Name	Jabatan Position	Rapat Internal Dewan Komisaris Board of Commissioners Internal Meeting			Rapat Gabungan dengan Direksi Joint Meeting with Board of Directors		
		Total Rapat Total Meetings	Total Kehadiran Total Attendance	Tingkat Kehadiran Attendance Rate (%)	Total Rapat Total Meetings	Total Kehadiran Total Attendance	Tingkat Kehadiran Attendance Rate (%)
Zaenal Abidin Ph.D	Komisaris Utama Independen Independent President Commissioner	7	7	100.00	8	8	100.00
Gunawan Tenggarahardja	Komisaris Independen Independent Commissioner	7	7	100.00	8	8	100.00
Sia Leng Ho	Komisaris Commissioner	7	7	100.00	8	8	100.00
Rata-Rata Kehadiran (%) Average Attendance (%)				**100.00**			**100.00**

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

Agenda Rapat Internal Dewan Komisaris

Agenda yang dibahas dalam rapat internal Dewan Komisaris meliputi:

1. Penyesuaian tugas dan wewenang Direksi sesuai dengan Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Penetapan Tata Kelola Bagi Bank Umum;
2. Perubahan struktur keanggotaan Komite Pemantau Risiko;
3. Rencana Revisi RBB Tahun 2024-2026;
4. Laporan Direktur Kepatuhan untuk Semester I Tahun 2024;
5. Laporan Tingkat Kesehatan Bank untuk Semester I Tahun 2024;
6. Pembahasan Otoritas Jasa Keuangan No. 3 Tahun 2023 dan Peraturan Otoritas Jasa Keuangan No. 22 Tahun 2023;
7. Implementasi Undang-Undang No. 27 Tahun 2022 tentang Perlindungan Data Pribadi (PDP); dan
8. Rencana Kerja Dewan Komisaris Tahun 2025.

Agenda Rapat Gabungan dengan Direksi

Agenda yang dibahas dalam rapat gabungan Dewan Komisaris dengan Direksi meliputi:

1. Rencana strategis Bank;
2. Rencana kerja tahun 2024;
3. Evaluasi kinerja Bank Victoria per 31 Desember 2023 dibandingkan dengan target RBB 2023-2025;
4. Evaluasi kinerja Bank Victoria per 31 Januari 2024 dibandingkan dengan target RBB 2024-2026;
5. Evaluasi kinerja Bank Victoria per 31 Maret 2024 dibandingkan dengan target RBB 2024-2026;
6. Evaluasi kinerja Bank Victoria per 31 Mei 2024 dan proyeksi per 30 Juni 2024;
7. Evaluasi kinerja Bank Victoria per 31 Juli 2024 dan proyeksi per 31 Agustus 2024;
8. Evaluasi kinerja Bank Victoria per 30 September 2024 dan target per 30 September 2024;
9. Evaluasi kinerja keuangan RBB 2025-2027; dan
10. Hal-hal penting lainnya yang perlu dibahas dalam rapat gabungan.

Persetujuan dan Rekomendasi Dewan Komisaris

Berdasarkan Peraturan Otoritas Jasa Keuangan No. 55/POJK.03/2016 dan Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023, ketentuan keputusan yang perlu mendapat persetujuan Dewan Komisaris sebagai berikut:

1. Dewan Komisaris dilarang untuk ikut serta dalam pengambilan keputusan untuk kegiatan operasional Bank, kecuali:
   a. Penyediaan dana kepada pihak terkait sebagaimana diatur dalam ketentuan mengenai batas maksimum pemberian kredit bank umum; dan

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

Agenda of Board of Commissioners' Internal Meeting

The agenda discussed in the internal meeting of Board of Commissioners covers:

1. Adjustment of duties and authorities of Board of Directors in accordance with Financial Services Authority Regulation No. 17 of 2023 on Determination of Governance for Commercial Banks;
2. Changes in the structure of Risk Monitoring Committee;
3. Revision Plan for the 2024-2026 RBB;
4. Compliance Director's Report for Semester I of 2024;
5. Bank Sound Level Report for Semester I of 2024;
6. Discussion of Financial Services Authority No. 3 of 2023 and Financial Services Authority Regulation No. 22 of 2023;
7. Implementation of Law No. 27 of 2022 on Personal Data Protection (PDP); and
8. Board of Commissioners' Work Plan for 2025.

Agenda of Joint Meeting with Board of Directors

The agenda discussed in the joint meeting of Board of Commissioners with the Board of Directors covers:

1. Bank's strategic plan;
2. 2024 work plan;
3. Evaluation of Bank Victoria's performance as of 31 December 2023 compared to the 2023-2025 RBB target;
4. Evaluation of Bank Victoria's performance as of 31 January 2024 compared to the 2024-2026 RBB target;
5. Evaluation of Bank Victoria's performance as of 31 March 2024 compared to the 2024-2026 RBB target;
6. Evaluation of Bank Victoria's performance as of 31 May 2024 and projections as of 30 June 2024;
7. Evaluation of Bank Victoria's performance as of 31 July 2024 and projections as of 31 August 2024;
8. Evaluation of Bank Victoria's performance as of 30 September 2024 and targets as of 30 September 2024;
9. Evaluation of the 2025-2027 RBB financial performance; and
10. Other important matters that need to be discussed in the joint meeting.

Board of Commissioners' Approvals and Recommendations

Pursuant to the Financial Services Authority Regulation No. 55/POJK.03/2016 and Financial Services Authority Regulation No. 17 of 2023, the provisions on decisions that require the Board of Commissioners' approval are as follows:

1. The Board of Commissioners is prohibited from taking part in decision making for the Bank's operational activities, unless:
   a. Provision of fund to related party as stipulated in the provisions regarding legal lending limit for commercial bank; and

b. Hal-hal lain yang ditetapkan dalam Anggaran Dasar Bank atau peraturan perundang-undangan yang berlaku;

2. Pengambilan keputusan kegiatan operasional Bank oleh Dewan Komisaris sebagaimana dimaksud di atas merupakan bagian dari tugas pengawasan oleh Dewan Komisaris sehingga tidak meniadakan tanggung jawab Direksi atas pelaksanaan kepengurusan Bank.

Sepanjang tahun 2024, Dewan Komisaris telah mengeluarkan 17 (tujuh belas) persetujuan dan rekomendasi mencakup berbagai aspek penting dalam pengelolaan Bank. Beberapa di antaranya meliputi arahan hasil penelaahan terhadap Laporan Keuangan Tahunan dan pengendalian internal, pembagian tugas serta wewenang anggota Direksi, serta hasil evaluasi terhadap laporan tingkat kesehatan Bank. Selain itu, Dewan Komisaris juga memberikan arahan terkait hasil penelaahan Laporan Direktur Kepatuhan dan Manajemen Risiko, Laporan Hasil Pemeriksaan SKAI, serta Laporan Profil Risiko.

Dalam aspek tata kelola, Dewan Komisaris turut memberikan rekomendasi mengenai kebijakan kompensasi, serta persetujuan atas penunjukan kantor akuntan publik dan/atau akuntan publik. Selain itu, Dewan Komisaris juga menelaah temuan hasil pemeriksaan Otoritas Jasa Keuangan tahun 2024 dan memberikan arahan terkait langkah-langkah perbaikannya. Sebagai bagian dari perencanaan tahun berikutnya, Dewan Komisaris juga menyusun jadwal rapat Dewan Komisaris dan Direksi untuk tahun 2025 guna memastikan kelancaran koordinasi dan pengawasan terhadap kebijakan strategis Bank.

Selain memberikan rekomendasi atas penunjukan akuntan publik/kantor akuntan publik untuk melakukan audit atas laporan keuangan historis tahunan Bank Victoria untuk tahun buku yang berakhir pada 31 Desember 2024, Dewan Komisaris juga memberikan arahan kepada Direksi dengan mengeluarkan 5 (lima) memorandum. Arahan tersebut mencakup hasil penelaahan terhadap laporan keuangan serta pengendalian internal sepanjang tahun 2024, dengan rincian sebagai berikut:

1. Direksi diinstruksikan untuk mengevaluasi capaian kinerja serta mengoptimalkan strategi dan upaya dalam pencapaian RBB secara lebih efektif dan efisien;
2. Kantor cabang diinstruksikan untuk meningkatkan kinerja keuangan dengan mengurangi ketergantungan pada deposito inti melalui perluasan basis nasabah serta peningkatan proporsi *Current Account Savings Account* (CASA) guna menekan biaya dana yang tinggi;
3. Pemeliharaan terhadap rekening *dormant* perlu ditingkatkan guna mencegah potensi penyalahgunaan. Selain itu, tindak lanjut harus dilakukan dengan menghubungi nasabah untuk mengaktifkan kembali rekening yang tidak aktif;
4. Pengelolaan dan monitoring aktivitas perkreditan perlu ditingkatkan, mulai dari analisa hingga pemantauan, termasuk dokumentasi perkreditan yang lebih akurat dan komprehensif;

b. Other matters specified in the Bank's Articles of Association or in the applicable laws and regulations;

2. Decision making on Bank operational activities by the Board of Commissioners as referred to in the above is part of the supervisory function of the Board of Commissioners and does not negate the Board of Directors' responsibility for the implementation of Bank management.

Throughout 2024, the Board of Commissioners issued 17 (seventeen) approvals and recommendations covering various important aspects in the management of the Bank. Some of these included directives on the review results of Annual Financial Statements and internal control, division of duties and authorities of Board of Directors' members, and evaluation results of the Bank's sound level report. In addition, the Board of Commissioners also provided directives related to the review results of Compliance and Risk Management Director's Report, SKAI Audit Result Report, and Risk Profile Report.

In terms of governance, the Board of Commissioners also provided recommendations on compensation policy, as well as approval for the appointment of public accounting firm and/or public accountant. Furthermore, the Board of Commissioners also reviewed the findings of Financial Services Authority's audit results in 2024 and provided directives regarding their corrective measures. As part of planning for the following year, the Board of Commissioners also prepared the schedule for the Board of Commissioners and Board of Directors meetings for 2025 to ensure smooth coordination and supervision of the Bank's strategic policies.

In addition to providing recommendations on the appointment of public accountant/public accounting firm to audit Bank Victoria's annual historical financial statements for the fiscal year ended on 31 December 2024, the Board of Commissioners also provided direction to the Board of Directors by issuing 5 (five) memoranda. The direction included the review results of financial statements and internal controls throughout 2024, with the following details:

1. The Board of Directors is instructed to evaluate performance achievements and optimize strategies and efforts in achieving RBB more effectively and efficiently;
2. Branch offices are instructed to improve financial performance by reducing dependence on core deposits through expanding customer base and increasing proportion of Current Account Savings Accounts (CASA) to reduce high funding costs;
3. Maintenance of dormant accounts needs to be improved to prevent potential misuse. In addition, follow-up must be done by contacting customers to reactivate inactive accounts;
4. Management and monitoring of credit activities need to be improved, starting from analysis to monitoring, including more accurate and comprehensive credit documentation;

5. Monitoring pembayaran serta kunjungan ke lokasi usaha nasabah harus dilakukan secara berkala, termasuk penilaian kembali (re-taksasi) jaminan sesuai dengan ketentuan yang berlaku;
6. Kantor cabang diinstruksikan untuk mengoptimalkan upaya penagihan terhadap tunggakan biaya asuransi, administrasi, dan provisi debitur guna meningkatkan pendapatan Bank;
7. Upaya penurunan *outstanding* Aset Yang Diambil Alih (AYDA) perlu dioptimalkan guna meningkatkan pendapatan Bank serta mengurangi beban penyediaan Cadangan Kerugian Penurunan Nilai (CKPN) atas AYDA, termasuk dalam penyelesaian kredit bermasalah (*Non-Performing Loan*/NPL);
8. Penginputan data nasabah harus dilakukan dengan lebih cermat dan sesuai dengan profil yang sebenernya, Selain itu, nasabah diimbau untuk lebih aktif menggunakan rekening Bank Victoria dalam aktivitas keuangan usahanya;
9. Kantor cabang diinstruksikan untuk meningkatkan pengawasan terhadap pemenuhan atau kelengkapan dokumen kredit, termasuk laporan keuangan *in-house* dan performa terkini, melakukan penilaian kembali terhadap jaminan, serta menyusun laporan hasil kunjungan ke lokasi usaha nasabah (*call report*). Selain itu, proses pemberian kredit harus dilakukan dengan lebih *prudent* dan sesuai dengan ketentuan yang berlaku; dan
10 Pengendalian internal perlu ditingkatkan di seluruh aspek dengan memperhatikan hasil penilaian SKAI serta temuan yang menjadi perhatian Otoritas Jasa Keuangan dan kantor akuntan publik. Dengan demikian, ke depan diharapkan Bank dapat menjalankan operasional secara lebih optimal serta meningkatkan kesadaran terhadap aspek kepatuhan dan manajemen risiko.

Sertifikasi Manajemen Risiko Dewan Komisaris

Pada tahun 2024, seluruh anggota Dewan Komisaris Bank telah memiliki sertifikasi manajemen risiko sebagaimana yang disyaratkan dalam Peraturan Otoritas Jasa Keuangan No. 24 Tahun 2022 tentang Pengembangan Kualitas Sumber Daya Manusia Bank Umum. Informasi tersebut telah disampaikan dalam profil masing-masing anggota Dewan Komisaris pada bab Profil Perusahaan.

5. Payment monitoring and visits to customer business locations must be carried out periodically, including re-assessment of collateral in accordance with the applicable regulations;
6. Branch offices are instructed to optimize collection efforts for arrears in insurance fees, administration, and debtor provisions to increase the Bank's income;
7. Efforts to reduce outstanding Foreclosed Assets (AYDA) need to be optimized to increase the Bank's income and reduce the burden of providing Allowance for Impairment Losses (CKPN) on AYDA, including in the settlement Non-Performing Loans (NPL);
8. Inputting customer data must be done more carefully and in accordance with the actual profile. In addition, customers are encouraged to be more active in using Bank Victoria accounts in their business financial activities;
9. Branch offices are instructed to increase supervision on the fulfillment or completeness of credit documents, including in-house financial statements and current performance, re-evaluate collateral, and prepare reports on the results of visits to customer business locations (call report). Furthermore, lending process must be carried out more prudently and in accordance with the applicable regulations; and
10. Internal control needs to be enhanced in all aspects by considering the results of SKAI assessment and findings that are of concern to the Financial Services Authority and public accounting firm. Therefore, in the future, the Bank is expected to carry out operations more optimally and increase awareness of compliance and risk management aspects.

Board of Commissioners' Risk Management Certification

In 2024, all members of the Bank's Board of Commissioners obtained the risk management certification as required by the Financial Services Authority Regulation No. 24 of 2022 on Human Resources Quality Development for Commercial Banks. This information is presented in the profile of each Board of Commissioners' member in the Company Profile chapter.

Direksi
Board of Directors

Direksi merupakan organ Bank yang mempunyai wewenang dan tanggung jawab penuh untuk memastikan seluruh aktivitas operasional Bank berlangsung sesuai dengan rencana dan mampu mencapai target yang telah ditetapkan.

The Board of Directors is the Bank's organ that has full authority and responsibility to ensure that all of the Bank's operational activities are carried out in accordance with the plan and are able to achieve the predetermined targets.

Pedoman Direksi

Pedoman kerja Direksi tertuang dalam *Board of Directors Charter (BOD Charter)* yang telah dimutakhirkan berdasarkan Keputusan Direksi No. 006A/SK-DIR/12/23 tanggal 6 Desember 2023.

Board of Directors Charter

The Board of Directors' work guideline is set out in the Board of Directors Charter (BOD Charter) which has been updated based on Board of Directors' Decision No. 006A/SK-DIR/12/23 dated 6 December 2023.

Ruang Lingkup Pekerjaan dan Tanggung Jawab Masing-Masing Anggota Direksi

Ruang lingkup tugas dan tanggung jawab masing-masing anggota Direksi berdasarkan Keputusan No. 001/SK-KOM/10/24 tanggal 2 Oktober 2024 tentang Pembagian Tugas dan Wewenang Anggota *Board of Directors*, diuraikan sebagai berikut:

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

The scope of duties and responsibilities of each member of the Board of Directors, based on Decision No. 001/SK-KOM/10/24 dated 2 October 2024 on Distribution of Duties and Authorities of the Board of Directors' Members, is described as follows:

Nama dan Jabatan Name and Position	Tugas dan Tanggung Jawab Duties and Responsibilities	
Achmad Friscantono Direktur Utama President Director	Koordinasi pengelolaan Bank Victoria yang membawahi Divisi: • *SEVP of Change Management Office;* • *Change Management Office Division;* • *SKAI Division;* • *Treasury Division;* • *Information Technology Division;* • *Marketing Communication, Product & Digital Marketing Division;* dan • *Corporate Legal Division.*	Coordination of Bank Victoria management which oversees the Divisions of: • SEVP of Change Management Office; • Change Management Office Division; • SKAI Division; • Treasury Division; • Information Technology Division; • Marketing Communication, Product & Digital Marketing Division; and • Corporate Legal Division.
Rusli Wakil Direktur Utama Deputy President Director	Wakil Direktur Utama yang membawahi Divisi/Departemen: • *SEVP of Operations & International Banking;* • *Operations & Internal Control Division;* • *International Banking Division;* • *Special Asset Management Division;* • *Credit Risk Review Division;* • HCM *& General Affair Division;* dan • *Credit Monitoring & Collection.*	Deputy President Director in charge of Divisions/Department of: • SEVP of Operations & International Banking; • Operations & Internal Control Division; • International Banking Division; • Special Asset Management Division; • Credit Risk Review Division; • HCM & General Affair Division; and • Credit Monitoring & Collection.
Lembing Direktur Bisnis Director of Business	Direktur Bisnis yang membawahi Divisi: • *SEVP of Business;* • *Commercial Banking Division;* • *SME I & Consumer Banking Division;* dan • *SME II Banking Division.*	Director of Business in charge of Divisions of: • SEVP of Business; • Commercial Banking Division; • SME I & Consumer Banking Division; and • SME II Banking Division.
Debora Wahjutirto Tanoyo Direktur Keuangan Director of Finance	Direktur Keuangan yang membawahi Divisi/Departemen: • *SEVP of Finance, Accounting & Management Information System;* • *Accounting Division;* • *Management Information System (MIS);* • *Loan & Trade Operations Division;* • *Credit Legal Division;* dan • *Branch Banking Network Division.*	Director of Finance in charge of Divisions/Department of: • SEVP of Finance, Accounting & Management Information System; • Accounting Division; • Management Information System (MIS); • Loan & Trade Operations Division; • Credit Legal Division; and • Branch Banking Network Division.

Nama dan Jabatan Name and Position	Tugas dan Tanggung Jawab Duties and Responsibilities	
Tamunan Direktur Kepatuhan dan Manajemen Risiko Director of Compliance and Risk Management	Direktur Kepatuhan dan Manajemen Risiko yang membawahi Divisi/Departemen: • *Compliance, System Procedure & Customer Protection Division;* • *Risk Management/Integrated Division;* • *Corporate Secretary Division;* • *Anti-Fraud;* dan • *Anti-Money Laundering, Counter Terrorist Financing & Weapon Mass Destruction (AML, CTF & WMD).*	Compliance and Risk Management Director in charge of Division/Department: • Compliance, System Procedure & Customer Protection Division; • Risk Management/Integrated Division; • Corporate Secretary Division; • Anti-Fraud; and • Anti-Money Laundering, Counter-Terrorist Financing & Weapon Mass Destruction (AML, CTF & WMD).

Wewenang Direksi

Wewenang Direksi Bank dalam menjalankan tugas dan tanggung jawabnya diuraikan sebagai berikut:

1. Mewakili Bank di dalam dan di luar pengadilan tentang segala hal dan dalam segala kejadian, mengikat Bank dengan pihak lain dan pihak lain dengan Bank, serta menjalankan segala tindakan, baik yang mengenai kepengurusan maupun kepemilikan, dengan pembatasan yang ditetapkan dalam Anggaran Dasar dan dengan memperhatikan peraturan perundang-undangan yang berlaku;
2. Untuk melakukan tindakan tertentu, Direksi terlebih dahulu harus mendapat persetujuan tertulis dari Dewan Komisaris kecuali ditentukan lain oleh peraturan dan ketentuan yang berlaku; dan
3. Memperoleh, mengalihkan, atau melepaskan dengan cara apapun hak-hak atas barang-barang tidak bergerak dan Bank.

Authority of the Board of Directors

The authority of the Bank's Board of Directors in performing its duties and responsibilities is described as follows:

1. Represent the Bank in and out of court on all matters and in any events, to bind the Bank to other parties and other parties to the Bank, and to carry out all actions, both on the management and ownership, with the limitations as stipulated in the Articles of Association with due regard to the applicable laws and regulations;
2. To perform certain actions, the Board of Directors must first obtain written approval from the Board of Commissioners, unless stipulated otherwise by the applicable rules and regulations; and
3. To obtain, transfer, or waive by any means the rights to immovable property and the Bank.

Jumlah, Komposisi, dan Independensi Direksi

Jumlah dan Komposisi

Bank wajib memiliki anggota Direksi paling sedikit 3 (tiga) orang anggota yang diangkat oleh RUPS untuk jangka waktu 3 (tiga) tahun serta dapat diangkat kembali untuk periode berikutnya. Berikut komposisi Direksi Bank pada tahun 2024:

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

Number and Composition

The Bank shall have at least 3 (three) members of Board of Directors, appointed by the GMS for a period of 3 (three) years and can be reappointed for the following period. The following is the composition of the Bank's Board of Directors in 2024:

Nama Name	Jabatan Position	Dasar Hukum Pengangkatan dan Masa Jabatan Legal Basis of Appointment and Term of Office
Achmad Friscantono	Direktur Utama President Director	Keputusan RUPS Tahunan tanggal 3 Juni 2022 (2022-2025). Annual GMS Resolution dated 3 June 2022 (2022-2025).
Rusli	Wakil Direktur Utama Deputy President Director	Keputusan RUPS Tahunan tanggal 3 Juni 2022 (2022-2025). Annual GMS Resolution dated 3 June 2022 (2022-2025).
Lembing	Direktur Director	Keputusan RUPS Tahunan tanggal 3 Juni 2022 (2022-2025). Annual GMS Resolution dated 3 June 2022 (2022-2025).
Debora Wahjutirto Tanoyo	Direktur Director	Keputusan RUPS Tahunan tanggal 3 Juni 2022 (2022-2025). Annual GMS Resolution dated 3 June 2022 (2022-2025).
Tamunan	Direktur Kepatuhan dan Manajemen Risiko Director of Compliance and Risk Management	Keputusan RUPS Tahunan tanggal 3 Juni 2022 (2022-2025). Annual GMS Resolution dated 3 June 2022 (2022-2025).

Independensi

Seluruh anggota Direksi senantiasa mengedepankan prinsip independensi dalam setiap pelaksanaan tugas dan tanggung jawabnya demi menjamin tidak terjadinya hal-hal yang berpotensi menimbulkan benturan kepentingan dan kerugian bagi Bank.

Independence

All members of the Board of Directors always prioritize independence principle in every implementation of their duties and responsibilities to ensure that there are no potential conflicts of interest nor losses for the Bank.

Penilaian Kemampuan dan Kepatutan Direksi

Pada tahun 2024, seluruh anggota Direksi Bank telah memenuhi syarat dan lulus uji kemampuan serta kepatutan sebagaimana yang disyaratkan dalam Peraturan Otoritas Jasa Keuangan No. 27/POJK.03/2016 tentang Penilaian Kemampuan dan Kepatutan Pihak Utama Lembaga Jasa Keuangan. Informasi tersebut telah disampaikan dalam profil masing-masing anggota Direksi pada bab Profil Perusahaan.

Fit and Proper Test for the Board of Directors

In 2024, all members of the Bank's Board of Directors fulfilled the requirements and passed the fit and proper test as required in the Financial Services Authority Regulation No. 27/POJK.03/2016 on Fit and Proper Test for Key Parties of Financial Services Institutions. This information is presented in the profile of each Board of Directors' member in the Company Profile chapter.

Rapat Direksi

Kebijakan Rapat Direksi

Selain keharusan untuk menghadiri RUPS, Direksi juga wajib mengadakan rapat internal paling sedikit 1 (satu) kali dalam 1 (satu) bulan dan rapat dengan Dewan Komisaris paling sedikit 1 (satu) kali dalam 4 (empat) bulan. Teknis pelaksanaan rapat dapat dilakukan secara langsung maupun secara *teleconference* dengan tetap memperhatikan keabsahan pengambilan keputusan.

Frekuensi Kehadiran Rapat Direksi

[G-02]

Selama tahun 2024, Direksi telah melaksanakan rapat dengan rincian kehadiran masing-masing anggota sebagai berikut:

Board of Directors' Meetings

Board of Directors' Meeting Policy

In addition to the requirement to attend the GMS, the Board of Directors is also required to hold internal meetings at least once in 1 (one) month and meetings with the Board of Commissioners at least once every 4 (four) months. Technically, the meeting can be conducted in person or via teleconference while still considering the validity of decision making.

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

Throughout 2024, the Board of Directors held meetings with details of each member's attendance as follows:

Nama Name	Jabatan Position	Rapat Internal Direksi Board of Directors Internal Meeting			Rapat Gabungan dengan Dewan Komisaris Joint Meeting with Board of Commissioners		
		Total Rapat Total Meetings	Total Kehadiran Total Attendance	Tingkat Kehadiran Attendance Rate (%)	Total Rapat Total Meetings	Total Kehadiran Total Attendance	Tingkat Kehadiran Attendance Rate (%)
Achmad Friscantono	Direktur Utama President Director	50	50	100.00	8	8	100.00
Rusli	Wakil Direktur Utama Deputy President Director	50	49	98.00	8	7	87.50
Lembing	Direktur Director	50	44	88.00	8	8	100.00
Debora Wahjutirto Tanoyo	Direktur Director	50	44	88.00	8	8	100.00
Tamunan	Direktur Kepatuhan dan Manajemen Risiko Director of Compliance and Risk Management	50	47	94.00	8	7	87.50
Rata-Rata Kehadiran (%) **Average Attendance (%)**				**93.60**			**95.00**

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

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

Agenda Rapat Internal Direksi

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

Agenda of Board of Directors' Internal Meeting

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

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

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

Persetujuan dan Rekomendasi Direksi

Sepanjang tahun 2024, Direksi telah mengeluarkan 162 persetujuan dan rekomendasi yang mencakup berbagai aspek penting dalam pengelolaan Bank. Beberapa di antaranya terkait dengan kebijakan manajemen risiko, kebijakan perkreditan, kebijakan tata kelola perusahaan, sistem keamanan informasi, kebijakan kepatuhan, strategi *anti-fraud*, serta berbagai standar operasional prosedur yang mendukung operasional perbankan, layanan digital, dan produk perbankan.

Board of Directors' Approvals and Recommendations

Throughout 2024, the Board of Directors issued 162 approvals and recommendations covering various important aspects in the management of the Bank. Some of them were related to risk management policies, credit policies, corporate governance policies, information security system, compliance policies, anti-fraud strategy, and various standard operating procedures that supported banking operations, digital services, and banking products.

Sertifikasi Manajemen Risiko Direksi

Pada tahun 2024, seluruh anggota Direksi Bank telah memiliki sertifikasi manajemen risiko sebagaimana yang disyaratkan dalam Peraturan Otoritas Jasa Keuangan No. 24 Tahun 2022 tentang Pengembangan Kualitas Sumber Daya Manusia Bank Umum. Informasi tersebut telah disampaikan dalam profil masing-masing anggota Direksi pada bab Profil Perusahaan.

Board of Directors' Risk Management Certification

In 2024, all members of the Bank's Board of Directors obtained the risk management certification as required by the Financial Services Authority Regulation No. 24 of 2022 on Human Resources Quality Development for Commercial Banks. This information is presented in the profile of each Board of Directors' member in the Company Profile chapter.

Rangkap Jabatan Dewan Komisaris dan Direksi

Concurrent Positions of the Board of Commissioners and Board of Directors

Ketentuan rangkap jabatan Dewan Komisaris dan Direksi Bank mengacu pada Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Tata Kelola Bank Umum, yang melarang rangkap jabatan sebagai berikut:

1. Dewan Komisaris merangkap jabatan sebagai anggota Dewan Komisaris, anggota Direksi, anggota Dewan Pengawas Syariah, atau Pejabat Eksekutif pada lembaga keuangan atau perusahaan keuangan baik bank maupun bukan bank;

2. Dewan Komisaris dilarang merangkap jabatan sebagai anggota Dewan Komisaris, anggota Direksi, anggota Dewan Pengawas Syariah, atau Pejabat Eksekutif pada lebih dari 1 (satu) lembaga atau perusahaan bukan keuangan, baik yang berkedudukan di dalam maupun di luar negeri;

3. Direksi merangkap jabatan sebagai anggota Dewan Komisaris, anggota Direksi, anggota Dewan Pengawas Syariah, atau Pejabat Eksekutif pada bank, perusahaan, dan/atau lembaga lain;

The provisions for concurrent positions of the Bank's Board of Commissioners and Board of Directors refer to the Financial Services Authority Regulation No. 17 of 2023 on Governance for Commercial Banks, which prohibits concurrent positions as follows:

1. The Board of Commissioners holds concurrent position as members of Board of Commissioners, members of Board of Directors, members of Sharia Supervisory Board, or Executive Officers in financial institutions or financial companies, either banks and non-banks;
2. The Board of Commissioners is prohibited from holding concurrent position as members of Board of Commissioners, members of Board of Directors, members of Sharia Supervisory Board, or Executive Officers in more than 1 (one) non-financial institution or company, either domiciled within or outside the country;
3. The Board of Directors holds concurrent position as members of Board of Commissioners, members of Board of Directors, members of Sharia Supervisory Board, or Executive Officers at other banks, companies, and/or other institutions;

4. Dewan Komisaris dan Direksi merangkap jabatan pada bidang tugas fungsional pada lembaga keuangan bank dan/atau lembaga keuangan bukan bank yang berkedudukan di dalam maupun di luar negeri;
5. Dewan Komisaris dan Direksi merangkap jabatan pada jabatan lain yang dapat menimbulkan benturan kepentingan dalam pelaksanaan tugas sebagai anggota Dewan Komisaris atau Direksi;
6. Dewan Komisaris dan Direksi merangkap jabatan pada jabatan lain sesuai dengan ketentuan peraturan perundang-undangan; dan
7. Komisaris Independen dilarang merangkap jabatan sebagai pejabat publik.

Informasi rangkap jabatan Dewan Komisaris dan Direksi telah disampaikan dalam profil masing-masing anggota Dewan Komisaris dan Direksi pada bab Profil Perusahaan.

4. The Board of Commissioners and Board of Directors hold concurrent position in the field of functional duties at bank financial institutions and/or non-bank financial institutions domiciled within or outside the country;
5. The Board of Commissioners and Board of Directors hold concurrent position in other positions that can cause conflicts of interest in performing their duties as members of Board of Commissioners or Board of Directors;
6. The Board of Commissioners and Board of Directors hold concurrent position in other positions in accordance with the provisions of the laws and regulations; and
7. Independent Commissioners are prohibited from holding concurrent position as public officials.

Information on concurrent positions of the Board of Commissioners and Board of Directors is presented in the profile of each member of the Board of Commissioners and Board of Directors in the Company Profile chapter.

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

Performance Assessment of the Board of Commissioners, Board of Directors, Board of Commissioners' Supporting Committees, and Board of Directors' Committees and Supporting Organs

Penilaian Kinerja Dewan Komisaris

Prosedur Pelaksanaan Penilaian Kinerja Dewan Komisaris

Proses penilaian kinerja Dewan Komisaris di Bank Victoria dilakukan secara rutin setiap tahun dengan melibatkan Komite Remunerasi dan Nominasi. Penilaian dilakukan melalui 2 (dua) metode, yaitu penilaian sendiri dan *peer evaluation*. Penilaian sendiri dilakukan oleh masing-masing anggota Dewan Komisaris sesuai dengan ketentuan yang diatur dalam Peraturan Otoritas Jasa Keuangan tentang Tata Kelola bagi Bank Umum. Sementara itu, *peer evaluation* melibatkan penilaian antar anggota Dewan Komisaris, di mana setiap anggota mengevaluasi kinerja rekan-rekannya berdasarkan bidang pengawasan dan tanggung jawab masing-masing. Hasil penilaian kemudian disampaikan oleh Komite Remunerasi dan Nominasi kepada Pemegang Saham sebelum RUPS Tahunan untuk digunakan sebagai dasar pengambilan keputusan terkait remunerasi dan kinerja Dewan Komisaris.

Board of Commissioners' Performance Asssessment

Procedures for the Board of Commissioners' Performance Assessment

The process of assessing the Board of Commissioners' performance at Bank Victoria is conducted regularly every year by involving the Remuneration and Nomination Committee. The assessment is carried out through 2 (two) methods, namely self-assessment and peer evaluation. Self-assessment is conducted by each member of the Board of Commissioners in line with the provisions stipulated in the Financial Services Authority Regulation on Governance for Commercial Banks. Meanwhile, peer evaluation involves assessments among members of the Board of Commissioners, with each member evaluating colleague performance based on the respective supervision areas and responsibilities. The assessment results are then submitted by the Remuneration and Nomination Committee to Shareholders prior to the Annual GMS to be used as the basis for adopting resolutions regarding the remuneration and performance of the Board of Commissioners.

Pihak yang Melakukan Penilaian Kinerja Dewan Komisaris

Untuk penilaian sendiri, penilaian dikoordinir oleh Divisi *Compliance, System Procedure & Customer Protection* dan dilaporkan kepada Dewan Komisaris melalui Komite Remunerasi dan Nominasi. Sementara untuk penilaian *peer evaluation,* penilaian dilakukan oleh setiap anggota Dewan Komisaris terhadap anggota Dewan Komisaris lainnya.

Kriteria Penilaian Kinerja Dewan Komisaris

Untuk penilaian sendiri, kriteria penilaian meliputi 16 indikator *governance structure*, 17 indikator *governance process*, dan 6 (enam) indikator *governance outcome* sebagaimana diatur dalam Lampiran III Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tentang Penerapan Tata Kelola bagi Bank Umum.

Sementara untuk *peer evaluation,* kriteria penilaian meliputi:

1. Kehadiran dalam rapat internal Dewan Komisaris, rapat gabungan Dewan Komisaris bersama Direksi, rapat Dewan Komisaris dengan Pemegang Saham, dan rapat Dewan Komisaris atau Komite dengan Unit Kerja Bank;
2. Integritas (misalnya benturan kepentingan yang muncul);
3. Pengetahuan dan pemahaman atas nilai-nilai misi, rencana jangka panjang Bank, dan refleksi pemahaman ini kepada isu-isu penting sepanjang tahun;
4. Kemampuan untuk menyampaikan, memberikan argumentasi, dan memberikan solusi mengenai isu-isu strategis Bank;
5. Kemampuan dalam mengikuti isu-isu dan tren yang berpengaruh terhadap Bank dan menggunakan informasi tersebut untuk menilai dan mengarahkan kinerja Bank, bukan hanya dari tahun ke tahun, akan tetapi juga dalam jangka panjang; dan
6. Hubungan anggota Dewan Komisaris dengan sesama anggota Dewan Komisaris lainnya, dengan Direksi, dan pihak-pihak lain yang diatur dalam Anggaran Dasar dan peraturan perundang-undangan.

Hasil Penilaian Kinerja Dewan Komisaris

Hasil evaluasi terhadap kinerja Dewan Komisaris, baik secara keseluruhan maupun secara individu, menjadi elemen penting dalam menentukan skema kompensasi dan pemberian insentif bagi Dewan Komisaris. Evaluasi juga berperan sebagai dasar pertimbangan utama bagi Pemegang Saham dalam mengambil keputusan terkait pemberhentian atau penunjukan kembali anggota Dewan Komisaris. Dengan demikian, penilaian kinerja tidak hanya berdampak pada penghargaan finansial, tetapi juga pada keberlanjutan peran masing-masing anggota dalam struktur kepemimpinan Bank.

Party Assessing the Board of Commissioners' Performance

For self-assessment, it is coordinated by the Compliance, System Procedure & Customer Protection Division and reported to the Board of Commissioners through Remuneration and Nomination Committee. Meanwhile, for peer evaluation, the assessment is carried out by each member of the Board of Commissioners against other members of the Board of Commissioners.

Criteria for Assessing the Board of Commissioners' Performance

For self-assessment, its criteria include 16 governance structure indicators, 17 governance process indicators, and 6 (six) governance outcome indicators as stipulated in Attachment III of the Financial Services Authority Circular No. 13/SEOJK.03/2017 on Governance Implementation for Commercial Banks.

Meanwhile, for peer evaluation, the assessment criteria include:

1. Attendance at internal meetings of the Board of Commissioners, joint meetings of the Board of Commissioners and the Board of Directors, meetings between the Board of Commissioners and Shareholders, and meetings between the Board of Commissioners or Committee with the Bank's Work Units;
2. Integrity (for example conflicts of interest that arise);
3. Knowledge and understanding of the values of the mission, the Bank's long-term plan, and the reflection of this understanding on important issues throughout the year;
4. Ability to convey, provide arguments and solutions regarding the Bank's strategic issues;
5. Ability to follow issues and trends that affect the Bank and use this information to assess and direct the Bank's performance, not only from year to year, but also in the long-term; and
6. The relationship between member of the Board of Commissioners and fellow members of the Board of Commissioners, and the Board of Directors and other parties as regulated in the Articles of Association and laws and regulations.

The Board of Commissioners' Performance Assessment Results

The Board of Commissioners' performance evaluation results, both collegially and individually, are important elements in determining the compensation scheme and providing incentives for the Board of Commissioners. The evaluation also serves as the main consideration for the Shareholders to adopt resolutions regarding dismissal or reappointment of members of the Board of Commissioners. Thus, performance assessment has impacts not only on financial rewards, but also on the sustainability of each member's role in the Bank's leadership structure. As part of transparency and accountability,

Sebagai bagian dari transparansi dan akuntabilitas, hasil penilaian kinerja Dewan Komisaris tahun 2024 sebagai berikut:

the results of the Board of Commissioners' performance assessment in 2024 are as follows:

Penilaian Sendiri Self-Assessment	*Peer Evaluation*
Pada tahun 2024, hasil penilaian sendiri Dewan Komisaris memperoleh nilai komposit "1 (satu)" dengan kategori "Sangat Baik". In 2024, the Board of Commissioners' self-assessment results obtained a composite score of "1 (one)" under the category of "Very Good".	Pada tahun 2024, hasil penilaian *peer evaluation* pelaksanaan tugas Dewan Komisaris memperoleh nilai komposit "1 (satu)" dengan kategori "Sangat Baik". In 2024, the peer evaluation results of the implementation of Board of Commissioners' duties obtained a composite score of "1 (one)" under the category of "Very Good".

Penilaian Kinerja Direksi

Prosedur Pelaksanaan Penilaian Kinerja Direksi

Untuk mengukur pencapaian target kinerja Direksi, evaluasi terhadap kinerja Direksi, baik secara kolektif maupun individu, dilakukan minimal sekali dalam setahun. Proses penilaian ini dilakukan melalui 2 (dua) metode utama, yaitu penilaian sendiri oleh Direksi dan penilaian oleh Dewan Komisaris. Penilaian sendiri dilakukan sesuai dengan ketentuan yang diatur dalam Peraturan Otoritas Jasa Keuangan terkait Penerapan Tata Kelola bagi Bank Umum, yang mencakup penilaian atas pelaksanaan tugas dan tanggung jawab Direksi. Di sisi lain, Dewan Komisaris juga melakukan evaluasi terhadap kinerja Direksi melalui prosedur berikut:

1. Direksi menyusun *Key Performance Indicator* (KPI) yang memuat rencana kerja, sasaran, atau target yang akan dicapai dalam 1 (satu) tahun maupun triwulan;
2. Penilaian kinerja Direksi dilaksanakan oleh Dewan Komisaris, namun Direktur Utama dapat menilai Direksi lainnya;
3. Direksi melaporkan realisasi pencapaian target masing-masing KPI dalam laporan triwulan dan Laporan Tahunan kepada Dewan Komisaris, baik secara individu maupun kolektif untuk dievaluasi; dan
4. Hasil evaluasi KPI Direksi oleh Dewan Komisaris menjadi bahan penilaian pertanggungjawaban Direksi dalam pelaksanaan RUPS.

Pihak yang Melakukan Penilaian Kinerja Direksi

Untuk penilaian sendiri, penilaian dikoordinir oleh Divisi *Compliance, System Procedure & Customer Protection* dan dilaporkan kepada Dewan Komisaris dan Direksi. Sementara untuk penilaian oleh Dewan Komisaris, penilaian dilakukan oleh Dewan Komisaris.

Board of Directors' Performance Asssessment

Procedures for the Board of Directors' Performance Assessment

To measure the achievement of the Board of Directors' performance targets, evaluations of the Board of Directors' performance, both collectively and individually, are carried out at least once every year. This assessment process is carried out through 2 (two) main methods, namely self-assessment by Board of Directors and assessment by Board of Commissioners. Self-assessment is conducted in accordance with the provisions stipulated in the Financial Services Authority Regulation on Governance Implementation for Commercial Banks, which include assessments on implementation of the Board of Directors' duties and responsibilities. On the other hand, the Board of Commissioners also evaluates the Board of Directors' performance through the following procedures:

1. The Board of Directors prepares Key Performance Indicator (KPI) that includes work plan, objectives, or goals to be achieved within 1 (one) year and quarterly;
2. The Board of Directors' performance is assessed by the Board of Commissioners, but the President Director can assess other Directors;
3. The Board of Directors reports the realization of target achievement for each KPI in the quarterly report and Annual Report to the Board of Commissioners, whether individually or collectively, to be evaluated; and
4. The evaluation result of Board of Directors' KPI by the Board of Commissioners becomes means in assessing the Board of Directors' accountability in the GMS.

Party Assessing the Board of Directors' Performance

For self-assessment, it is coordinated by the Compliance, System Procedure & Customer Protection Division and reported to the Board of Commissioners and Board of Directors. Meanwhile, for assessment by Board of Commissioners, it is conducted by the Board of Commissioners.

Kriteria Penilaian Kinerja Direksi

Untuk penilaian sendiri, kriteria penilaian meliputi 16 indikator *governance structure*, 14 indikator *governance process*, dan 10 (sepuluh) indikator *governance outcome* sebagaimana diatur dalam Lampiran III Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tentang Penerapan Tata Kelola bagi Bank Umum. Sementara untuk penilaian oleh Dewan Komisaris, kriteria penilaian meliputi:

1. Terlaksananya kepemimpinan (*leadership*), kerja sama (*team work*), serta komunikasi dan kompetensi yang baik;
2. Terlaksananya GCG dalam setiap kegiatan usaha Bank;
3. Terlaksananya pencapaian RBB; dan
4. Terlaksananya pengawasan atas tindak lanjut dari Direksi berdasarkan audit, rekomendasi SKAI, auditor eksternal, atau pengawasan Otoritas Jasa Keuangan.

Criteria for Assessing the Board of Directors' Performance

For self-assessment, its criteria include 16 governance structure indicators, 14 governance process indicators, and 10 (ten) governance outcome indicators as stipulated in Attachment III of the Financial Services Authority Circular No. 13/SEOJK.03/2017 on Governance Implementation for Commercial Banks.
Meanwhile, for assessment by Board of Commissioners, its criteria include:

1. The implementation of good leadership, teamwork, as well as communication and competency;
2. The implementation of GCG in each of the Bank's business activities;
3. The achievement of the RBB; and
4. The implementation of monitoring and follow-up from the Board of Directors based on audit, recommendation of SKAI, external auditor, or the Financial Services Authority's supervision.

Hasil Penilaian Kinerja Direksi

Hasil penilaian kinerja Direksi berperan penting dalam menentukan skema kompensasi dan pemberian insentif bagi Direksi, serta menjadi faktor utama bagi Pemegang Saham dalam mengambil keputusan terkait pemberhentian atau penunjukan kembali anggota Direksi. Sebagai bagian dari komitmen terhadap transparansi dan akuntabilitas, hasil penilaian kinerja Direksi untuk tahun 2024 diuraikan sebagai berikut:

The Board of Directors' Performance Assessment Results

The Board of Directors' performance assessment results play an important role in determining compensation scheme and providing incentives for the Board of Directors, and serve as the main factor for the Shareholders to adopt resolutions regarding dismissal or reappointment of members of the Board of Directors. As part of the commitment to transparency and accountability, the results of the Board of Directors' performance assessment in 2024 are outlined as follows:

Penilaian Sendiri Self-Assessment	Penilaian oleh Dewan Komisaris Assessment by the Board of Commissioners
Pada tahun 2024, hasil penilaian sendiri Direksi memperoleh nilai komposit "2 (dua)" dengan kategori "Baik". In 2024, the Board of Directors' self-assessment results obtained a composite score of "2 (two)" under the category "Good".	Pada tahun 2024, hasil penilaian kinerja Direksi oleh Dewan Komisaris memperoleh nilai komposit "2 (dua)" dengan kategori "Baik". In 2024, the Board of Directors' performance assessment results obtained a composite score of "2 (two)" under the category "Good".

Penilaian Kinerja Komite Pendukung Dewan Komisaris

Performance Assessment of the Board of Commissioners' Supporting Committees

Prosedur Pelaksanaan Penilaian Kinerja Komite Pendukung Dewan Komisaris

Dewan Komisaris secara rutin melakukan pengawasan dan evaluasi menyeluruh terhadap kinerja Komite Audit, Komite Pemantau Risiko, serta Komite Remunerasi dan Nominasi. Evaluasi dilakukan setidaknya sekali dalam setahun, mencakup penilaian individual maupun kolektif, dengan tujuan memastikan efektivitas pengawasan dan tata kelola yang baik di setiap komite. Proses penilaian melibatkan metode penilaian sendiri oleh masing-masing komite pendukung Dewan Komisaris, serta penilaian kinerja oleh Dewan Komisaris sendiri. Hasil evaluasi menjadi landasan untuk memastikan komite-komite tersebut beroperasi sesuai dengan tujuan strategis Bank, sambil memperkuat kontribusi setiap komite terhadap pencapaian target Bank dan pengelolaan risiko yang lebih baik.

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

The Board of Commissioners regularly conducts comprehensive monitoring and evaluation of the performance of Audit Committee, Risk Monitoring Committee, and Remuneration and Nomination Committee. Evaluation is carried out at least once every year, including individual and collective assessments, with the aim of ensuring effective monitoring and good governance in each committee. The assessment process involves methods of self-assessment by each Board of Commissioner' supporting committee as well as performance assessment by the Board of Commissioners itself. The evaluation results serve as the basis for ensuring that these committees operate in accordance with the Bank's strategic objectives, while strengthening each committee contribution to achieving the Bank's targets and better risk management.

Pihak yang Melakukan Penilaian Kinerja Komite Pendukung Dewan Komisaris

Untuk penilaian sendiri, penilaian dikoordinir oleh Divisi *Compliance, System Procedure & Customer Protection* dan dilaporkan kepada Dewan Komisaris. Sementara untuk penilaian oleh Dewan Komisaris, penilaian dilakukan oleh Dewan Komisaris.

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

For self-assessment, it is coordinated by the Compliance, System Procedure & Customer Protection Division and reported to the Board of Commissioners. Meanwhile, for assessment by Board of Commissioners, it is conducted by the Board of Commissioners.

Kriteria Penilaian Kinerja Komite Pendukung Dewan Komisaris

Untuk penilaian sendiri, kriteria penilaian meliputi 10 (sepuluh) indikator *governance structure*, 7 (tujuh) indikator *governance process*, dan 2 (dua) indikator *governance outcome* sebagaimana diatur dalam Lampiran III Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tentang Penerapan Tata Kelola bagi Bank Umum.

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

1. Kehadiran dalam rapat Komite;
2. Penguasaan materi yang akan dibahas;
3. Kesediaan menyediakan waktu dan upaya dalam memenuhi tugas dan tanggung jawab sebagai anggota Komite;
4. Kesediaan berpartisipasi dalam kegiatan di luar kantor, seperti kunjungan ke unit bisnis;
5. Kualitas dan saran yang diberikan dalam rapat-rapat;
6. Terlaksananya pemantauan dan evaluasi, baik secara berkala maupun tahunan, atas hal-hal yang menjadi bidang tugas dan tanggung jawab masing-masing komite;
7. Pemantauan dan koreksi penyimpangan; dan
8. Terlaksananya pemantauan dan evaluasi terhadap divisi/unit yang terkait dengan bidang tugas dan tanggung jawab masing-masing komite.

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

For self-assessment, its criteria include 10 (ten) governance structure indicators, 7 (seven) governance process indicators, and 2 (two) governance outcome indicators as stipulated in Attachment III of the Financial Services Authority Circular No. 13/SEOJK.03/2017 on Governance Implementation for Commercial Banks.

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

1. Attendance at Committee's meetings;
2. Mastery of the material to be discussed;
3. Willingness to provide time and efforts in fulfilling duties and responsibilities as a Committee member;
4. Willingness to participate in activities outside the office, such as visits to business units;
5. Quality and advice given in meetings;
6. Implementation of monitoring and evaluation, both periodically and annually, on matters that are the respective areas of duties and responsibilities of each committee;
7. Monitoring and correction of deviation; and
8. Implementation of monitoring and evaluation of divisions/units related to the respective areas of duties and responsibilities of each committee.

Hasil Penilaian Kinerja Komite Pendukung Dewan Komisaris

Performance Assessment Results of the Board of Commissioners' Supporting Committees

Penilaian Sendiri **Self-Assessment**	
Pada tahun 2024, hasil penilaian sendiri pelaksanaan tugas dan tanggung jawab Komite pendukung Dewan Komisaris berada pada kategori "Baik".	In 2024, the self-assessment results of the implementation of duties and responsibilities of the Board of Commissioners' supporting committees were under the category of "Good".
Penilaian oleh Dewan Komisaris **Assessment by the Board of Commissioners**	
Komite Audit: Dewan Komisaris menilai bahwa Komite Audit telah menjalankan perannya secara optimal sepanjang tahun 2024, dengan menunjukkan kinerja yang efektif dalam mendukung fungsi pengawasan. Komite Audit tidak hanya berhasil memantau dan mengevaluasi perencanaan serta pelaksanaan audit secara mendalam, tetapi juga memastikan tindak lanjut yang tepat atas hasil temuan audit. Komite Audit secara aktif mengawasi langkah-langkah yang diambil oleh Direksi untuk menindaklanjuti rekomendasi dan komitmen yang dihasilkan dari pemeriksaan internal maupun eksternal. Pengawasan yang cermat ini berkontribusi signifikan dalam memastikan kepatuhan dan peningkatan tata kelola Bank secara menyeluruh.	**Audit Committee:** The Board of Commissioners evaluated that the Audit Committee performed its role optimally throughout 2024, by demonstrating effective performance in supporting monitoring function. The Audit Committee not only managed in monitoring and evaluating the planning and implementation of audit in depth, but also ensured appropriate follow-up to audit findings. The Audit Committee actively monitored the steps taken by the Board of Directors to follow up on recommendations and commitments resulting from internal and external audits. This careful monitoring gave significant contribution to ensuring compliance and improving the Bank's overall governance.

Komite Pemantau Risiko: Dewan Komisaris menyimpulkan bahwa kinerja Komite Pemantau Risiko sepanjang tahun 2024 telah berjalan dengan efektif. Komite Pemantau Risiko memainkan peran penting dalam mendukung Dewan Komisaris, terutama dalam mengidentifikasi, mengevaluasi, dan mengkaji berbagai aspek risiko yang dapat memengaruhi operasional dan stabilitas Bank. Selain itu, Komite Pemantau Risiko secara konsisten memberikan arahan strategis dan rekomendasi yang bermanfaat bagi pengembangan sistem manajemen risiko yang lebih komprehensif dan adaptif terhadap perubahan lingkungan bisnis. Kontribusi Komite Pemantau Risiko telah memperkuat upaya Bank dalam menjaga keseimbangan antara pencapaian target bisnis dan pengelolaan risiko secara bertanggung jawab.	**Risk Monitoring Committee:** The Board of Commissioners concluded that the Risk Monitoring Committee's performance throughout 2024 was effective. The Risk Monitoring Committee played an important role in supporting the Board of Commissioners, particularly in identifying, evaluating, and reviewing various risk aspects that could affect the Bank's operations and stability. In addition, the Risk Monitoring Committee consistently provided strategic direction and recommendations that were useful for developing a more comprehensive and adaptive risk management system to changes in business environment. The contribution of Risk Monitoring Committee strengthened the Bank's efforts to maintain a balance between achieving business targets and managing risks responsibly.
Komite Remunerasi dan Nominasi: Dewan Komisaris menilai bahwa Komite Remunerasi dan Nominasi telah melaksanakan tugas dan tanggung jawabnya secara efektif sepanjang tahun 2023. Komite Remunerasi dan Nominasi memberikan kontribusi yang signifikan dalam mendukung tata kelola perusahaan dengan menyusun dan merekomendasikan sistem remunerasi yang sesuai dan kompetitif untuk Dewan Komisaris dan Direksi. Selain itu, Komite Remunerasi dan Nominasi juga berperan penting dalam proses seleksi calon anggota Dewan Komisaris, Direksi, serta pihak independen yang akan menjadi anggota komite, dengan mempertimbangkan kualifikasi, integritas, dan kontribusi calon terhadap tujuan jangka panjang Bank. Rekomendasi-rekomendasi tersebut membantu memastikan bahwa Bank memiliki kepemimpinan yang berkualitas dan sejalan dengan strategi Bank serta prinsip-prinsip GCG.	**Remuneration and Nomination Committee:** The Board of Commissioners evaluated that the Remuneration and Nomination Committee performed its duties and responsibilities effectively throughout 2023. The Remuneration and Nomination Committee made significant contribution to support corporate governance by preparing and recommending appropriate and competitive remuneration systems for the Board of Commissioners and Board of Directors. In addition, the Remuneration and Nomination Committee also played an important role in selection process for candidates for the Board of Commissioners, Board of Directors, and independent parties who might become committee member, by considering candidates' qualifications, integrity, and contribution to the Bank's long-term objectives. These recommendations helped ensure that the Bank had quality leadership in line with the Bank's strategy and GCG principles.

Penilaian Kinerja Komite dan Organ Pendukung Direksi

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

Penilaian kinerja komite-komite di bawah Direksi dilakukan setiap tahun, baik secara individual maupun kolektif, untuk memastikan efektivitas dan kontribusi masing-masing komite terhadap pencapaian tujuan Bank. Proses evaluasi ini mengikuti metode yang telah ditetapkan dalam sistem yang diatur melalui keputusan Direksi, sehingga memungkinkan penilaian yang objektif dan terukur. Direksi bertanggung jawab penuh dalam melaksanakan evaluasi ini, dengan tujuan untuk memastikan bahwa kinerja komite-komite tersebut mendukung strategi bisnis yang lebih luas, sekaligus meningkatkan efisiensi operasional dan tata kelola yang baik. Hasil evaluasi digunakan sebagai dasar dalam menyusun rencana pengembangan dan peningkatan kinerja di masa mendatang.

Kriteria Penilaian Komite dan Organ Pendukung Direksi

Kriteria yang digunakan untuk menilai kinerja komite dan organ pendukung Direksi meliputi:

1. Kehadiran dalam rapat Komite;
2. Penguasaan materi yang akan dibahas;
3. Kesediaan menyediakan waktu dan upaya dalam memenuhi tugas dan tanggung jawab sebagai anggota Komite;
4. Kesediaan berpartisipasi dalam kegiatan di luar kantor, seperti kunjungan ke unit bisnis;
5. Kualitas dan saran yang diberikan dalam rapat-rapat;

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

Procedures and Party Assessing the Performance of the Board of Directors' Supporting Committees and Organs

Performance assessments of the committees under the Board of Directors are carried out every year, both individually and collectively, to ensure the effectiveness and contribution of each committee to achieving the Bank's objectives. This evaluation process follows the method established in the system set out by the Board of Directors' decision, thus allowing an objective and measurable assessment. The Board of Directors is fully responsible for carrying out this evaluation, with the aim of ensuring that the performance of these committees supports broader business strategy, while increasing operational efficiency and good governance. The evaluation results are used as the basis for preparing development plans and improving performance in the future.

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

The criteria used to assess the performance of committees and supporting organs of the Board of Directors include:

1. Attendance at Committee's meetings;
2. Mastery of the material to be discussed;
3. Willingness to allocate time and efforts in fulfilling duties and responsibilities as Committee member;
4. Willingness to participate in activities outside the office, such as visits to business units;
5. Quality and advice given in the meetings;

6. Terlaksananya pemantauan dan evaluasi, baik secara berkala maupun tahunan, atas hal-hal yang menjadi bidang tugas dan tanggung jawab masing-masing Komite;
7. Pemantauan dan koreksi penyimpangan; dan
8. Terlaksananya pemantauan dan evaluasi terhadap divisi/unit yang terkait dengan bidang tugas dan tanggung jawab masing-masing Komite.

Hasil Penilaian Kinerja Komite dan Organ Pendukung Direksi

Direksi menyimpulkan bahwa sepanjang tahun 2024, komite-komite dan organ pendukung di bawahnya telah menjalankan tugas dan tanggung jawabnya secara optimal dan efektif. Kesimpulan ini didasarkan pada evaluasi menyeluruh yang meliputi laporan berkala, masukan, dan rekomendasi yang diberikan oleh masing-masing komite sesuai dengan lingkup tugasnya. Selain itu, pelaksanaan tanggung jawab tiap organ pendukung dinilai sejalan dengan strategi Bank dan RBB tahun 2024. Komite dan organ pendukung tersebut juga berperan penting dalam membantu Direksi mengatasi tantangan bisnis, memastikan tata kelola yang baik, serta mendukung pencapaian target strategis yang telah ditetapkan.

6. Implementation of monitoring and evaluation, whether periodically or annually, on matters that are the respective areas of duties and responsibilities of each Committee;
7. Monitoring and correction of deviations; and
8. Implementation of monitoring and evaluation of divisions/units related to the respective areas of duties and responsibilities of each Committee.

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

The Board of Directors concluded that throughout 2024, the committees and supporting organs under it performed their duties and responsibilities optimally and effectively. This conclusion is based on comprehensive evaluation that includes periodic reports, input, and recommendations provided by each committee in line with its scope of duties. In addition, the responsibility implementation of each supporting organ is considered in line with the Bank's strategy and the Bank's 2024 RBB. The committee and supporting organs also play important roles in assisting the Board of Directors in overcoming business challenges, ensuring good governance, and supporting the achievement of strategic targets set.

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

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

Kebijakan Pelatihan dan/atau Peningkatan Kompetensi Dewan Komisaris dan Direksi

Bank Victoria memiliki kebijakan yang mendukung program pelatihan profesional bagi Dewan Komisaris dan Direksi sebagai bagian dari upaya meningkatkan kompetensi serta efektivitas kinerja dalam pengelolaan perusahaan. Program pengenalan dan peningkatan kompetensi dirancang untuk memastikan anggota Dewan Komisaris dan Direksi memiliki pemahaman menyeluruh tentang peran, tanggung jawab, dan strategi perusahaan.

Selain itu, terdapat program peningkatan kompetensi seperti pelatihan, seminar, atau lokakarya yang dilakukan secara berkala. Anggota yang mengikuti program pelatihan wajib menyampaikan laporan dan berbagi pengetahuan kepada rekan lainnya untuk memperluas wawasan kolektif. Adapun pelatihan dan/atau

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

Bank Victoria has a policy that supports professional training programs for the Board of Commissioners and Board of Directors as part of efforts to improve competency and performance effectiveness in managing the company. The introduction and competency development program is designed to ensure that members of the Board of Commissioners and Board of Directors have a comprehensive understanding of their roles, responsibilities, and corporate strategies.

In addition, there are competency development programs such as training, seminars, or workshops that are carried out periodically. Members who attend the training program are required to submit reports and share their knowledge with other colleagues to broaden collective insights. The training and/or competency development

peningkatan kompetensi yang diikuti Dewan Komisaris dan Direksi di tahun 2024, sebagai berikut:

attended by the Board of Commissioners and Board of Directors in 2024 are as follows:

Dewan Komisaris
Board of Commissioners

Materi Pelatihan dan Penyelenggara Training Materials and Organizers	Kehadiran Attendance		
	Zaenal Abidin Ph.D	Gunawan Tenggarahardja	Sia Leng Ho
Expert Sharing: Keuangan Berkelanjutan dari Bank Victoria Expert Sharing: Sustainable Finance from Bank Victoria	✓	✓	-
Dealing with Volatility, Uncertainty, Complexity, and Ambiguity (VUCA) Challenges: Contextual Leadership Journey dari Bank Victoria Dealing with Volatility, Uncertainty, Complexity, and Ambiguity (VUCA) Challenges: Contextual Leadership Journey from Bank Victoria	✓	✓	✓
Keanggotaan Wakil Manajer Investasi dari Perkumpulan Wakil Manajer Investasi Indonesia Membership of Deputy Investment Manager from Indonesian Investment Manager Representatives Association	✓	-	-
Peluang dan Tantangan *Open Finance* di Indonesia *Confirmation* dari Otoritas Jasa Keuangan Opportunities and Challenges of Open Finance in Indonesia Confirmation from the Financial Services Authority	-	✓	✓
Sharing Session "Menjalin Silaturahmi dalam Kebersamaan" dari Bank Victoria Sharing Session "Establishing Relationships in Togetherness" from Bank Victoria	✓	✓	✓
Program Pengkinian Sertifikasi Manajemen Risiko Jenjang 7 dari PT Efektifpro Knowledge Source Update Program of Risk Management Certification Level 7 from PT Efektifpro Knowledge Source	-	✓	✓
Resertifikasi Manajemen Risiko Jenjang 7 dari Lembaga Sertifikasi Profesi Perbankan Recertification of Risk Management Level 7 from Banking Profession Certification Institute	-	✓	✓
Resertifikasi Manajemen Risiko Jenjang 4 dan Jenjang 6 dari Lembaga Sertifikasi Profesi Perbankan Recertification of Risk Management Level 4 and Level 6 from Banking Profession Certification Institute	✓	-	-
Refreshment Manajemen Risiko Level 1-4 Badan Sertifikasi Manajemen Risiko dari PT Efektifpro Knowledge Source Refreshment of Risk Management Level 1-4, Risk Management Certification Institution from PT Efektifpro Knowledge Source	✓	✓	✓
Expert Sharing Session "Peluang dan Tantangan Pembiayaan Bank Pada Bisnis Model *Multi Finance*" dari Asosiasi Perusahaan Pembiayaan Indonesia Expert Sharing Session "Opportunities and Challenges of Bank Financing in Multi Finance Business Model" from Indonesian Financing Company Association	✓	✓	✓

Direksi
Board of Directors

Materi Pelatihan dan Penyelenggara Training Materials and Organizers	Kehadiran Attendance				
	Achmad Friscantono	Rusli	Lembing	Debora Wahjutirto Tanoyo	Tamunan
Expert Sharing: Keuangan Berkelanjutan dari Bank Victoria Expert Sharing: Sustainable Finance from Bank Victoria	✓	✓	✓	✓	✓
Dealing with Volatility, Uncertainty, Complexity, and Ambiguity (VUCA) Challenges: Contextual Leadership Journey dari Bank Victoria Dealing with Volatility, Uncertainty, Complexity, and Ambiguity (VUCA) Challenges: Contextual Leadership Journey from Bank Victoria	✓	✓	✓	✓	✓
Penyelarasan Manajemen Risiko Jenjang 7 "Meningkatkan Efektivitas Penerapan Manajemen Risiko untuk Mewujudkan Industri Perbankan yang Berkelanjutan" dari Bankers Association for Risk Management Perhimpunan Bank Nasional Alignment Risk Management Level 7 "Improving the Effectiveness of Risk Management Implementation to Realize a Sustainable Banking Industry" from Bankers Association for Risk Management of National Bank Association	-	✓	✓	✓	✓
Webinar "Penanganan Kejahatan Perbankan dengan Berlakunya Undang-Undang Pengembangan dan Penguatan Sektor Keuangan dan Peraturan Otoritas Jasa Keuangan No. 16 Tahun 2023" dari Forum Komunikasi Dewan Komisaris dan Dewan Pengawas Webinar "Handling Crimes in Banking with the Enactment of Law on the Development and Strengthening of Financial Sector and Financial Services Authority Regulation No. 16 of 2023" from Communication Forum for Board of Commissioners and Supervisory Board	-	-	-	-	✓
Sosialisasi Pelaksanaan *Bye Laws* dari Perhimpunan Bank Nasional – Forum Komunikasi Dewan Komisaris dan Dewan Pengawas Dissemination of Implementation of Bye Laws from National Bank Association - Communication Forum for Board of Commissioners and Supervisory Board	-	-	-	-	✓
Webinar "Peran Undang-Undang Pengembangan dan Penguatan Sektor Keuangan dalam Memberikan Efek Jera bagi Pelaku Jasa Keuangan Ilegal" dari Otoritas Jasa Keuangan Webinar "The Role of Law on the Development and Strengthening of Financial Sector in Providing Deterrent Effect for Illegal Financial Service Offenders" from Financial Services Authority	-	-	-	-	✓
"*Indonesian Banking Road to Net Zero Emission*" dari Otoritas Jasa Keuangan "Indonesian Banking Road to Net Zero Emission" Event from Financial Services Authority	-	-	-	-	✓
Seminar "*Debt Capital Market Seminar 2024: Outlook, Opportunity, and Sustainability*" dari PT Bursa Efek Indonesia Seminar "Debt Capital Market Seminar 2024: Outlook, Opportunity, and Sustainability" from Indonesia Stock Exchange	✓	-	-	-	-
Bloomberg Event - Teknologi *Fixed Income, Currencies, and Commodities Trading* dari Bloomberg Bloomberg Event - Technology of Fixed Income, Currencies, and Commodities Trading from Bloomberg	✓	-	-	-	-
Peluang dan Tantangan *Open Finance* di Indonesia *Confirmation* dari Otoritas Jasa Keuangan Opportunities and Challenges of Open Finance in Indonesia Confirmation from the Financial Services Authority	✓	-	-	-	-
Refreshment Tresuri Dealer Tingkat *Advance* dari Association Cambiste Internationale Financial Markets Association Indonesia Dealer Treasury Refreshment Level Advance from Association Cambiste Internationale Financial Markets Association Indonesia	-	✓	-	-	✓
Sharing Session "Menjalin Silaturahmi dalam Kebersamaan" dari Bank Victoria Sharing Session "Establishing Relationships in Togetherness" from Bank Victoria	✓	✓	✓	✓	✓
Webinar "*How to Prevent Accounting Fraud in Financial Sector*" dari Otoritas Jasa Keuangan Webinar "How to Prevent Accounting Fraud in Financial Sector" from Financial Services Authority	-	-	-	-	✓

Materi Pelatihan dan Penyelenggara Training Materials and Organizers	Kehadiran Attendance				
	Achmad Friscantono	Rusli	Lembing	Debora Wahjutirto Tanoyo	Tamunan
Training dan *Outbond* dari Bank Victoria Training and Outbound from Bank Victoria	-	-	✓	-	-
Forum Penguatan Fungsi *Governance, Risk, and Compliance*: Diseminasi Standar Audit Internal Terkini dari Otoritas Jasa Keuangan Institute Forum for Strengthening Governance, Risk, and Compliance Functions: Dissemination of the Latest Internal Audit Standards from Financial Services Authority Institute	-	-	-	-	✓
Program Pengkinian Sertifikasi Manajemen Risiko Jenjang 7 dari PT Efektifpro Knowledge Source Update Program of Risk Management Certification Level 7 from PT Efektifpro Knowledge Source	✓	✓	✓	-	✓
Resertifikasi Manajemen Risiko Jenjang 5 dari Lembaga Sertifikasi Profesi Perbankan Recertification of Risk Management Level 5 from Banking Profession Certification Institute	-	-	✓	✓	-
Resertifikasi Manajemen Risiko Jenjang 7 dari Lembaga Sertifikasi Profesi Perbankan Recertification of Risk Management Level 7 from Banking Profession Certification Institute	✓	✓	-	-	-
Webinar "Under*standing the Climate Landscape for Financial Institutions*" dari Otoritas Jasa Keuangan Institute Webinar "Understanding the Climate Landscape for Financial Institutions" from Financial Services Authority Institute	-	-	-	-	✓
Seminar Internasional "Optimalisasi Kolaborasi dalam Mencegah dan Menangani *Green Financial Crime* di Indonesia Menuju Indonesia Emas 2045" dari Forum Komunikasi Dewan Komisaris dan Dewan Pengawas International Seminar "Optimizing Collaboration in Preventing and Handling Green Financial Crime in Indonesia Towards Golden Indonesia 2045" from Communication Forum for Board of Commissioners and Supervisory Board	-	-	-	-	✓
Focus Group Discussion – Tindak Lanjut Komitmen Rembuk Nasional Pusat Pelaporan dan Analisis Transaksi Keuangan – Forum Komunikasi Dewan Komisaris dan Dewan Pengawas dari Forum Komunikasi Dewan Komisaris dan Dewan Pengawas Focus Group Discussion – Follow-up on the Commitment of National Consultation of Financial Transaction Reports and Analysis Center – Communication Forum for Board of Commissioners and Supervisory Board from the Communication Forum for Board of Commissioners and Supervisory Board	-	-	-	-	✓
Awareness Penerapan Peraturan Otoritas Jasa Keuangan Perlindungan Konsumen dan Undang-Undang Perlindungan Data Pribadi dari RSM Awareness of Implementation of Financial Services Authority Regulations on Consumer Protection and Personal Data Protection Law from RSM	✓	✓	-	-	✓
Focus Group Discussion "Persamaan Persepsi Perizinan Penilaian Kemampuan dan Kepatutan Kepengurusan dan Kepemilikan Bank Umum" dari Otoritas Jasa Keuangan Focus Group Discussion "Similar Perception of Licensing for Assessment of Capability and Properness of Management and Ownership of Commercial Banks" from Financial Services Authority	-	-	-	-	✓
Perhimpunan Bank Nasional *Chief Financial Officer Forum II - 2024* "*Navigating for Sustainability: Financial Leadership in a Changing World*" dari Perhimpunan Bank Nasional National Bank Association, Chief Financial Officer Forum II - 2024 "Navigating for Sustainability: Financial Leadership in a Changing World" from National Bank Association	✓	-	-	-	-

Materi Pelatihan dan Penyelenggara Training Materials and Organizers	Kehadiran Attendance				
	Achmad Friscantono	Rusli	Lembing	Debora Wahjutirto Tanoyo	Tamunan
Refreshment Manajemen Risiko Level 1-4 Badan Sertifikasi Manajemen Risiko dari PT Efektifpro Knowledge Source Refreshment of Risk Management Level 1-4, Risk Management Certification Institution from PT Efektifpro Knowledge Source	✓	-	✓	✓	✓
Expert Sharing Session "Peluang dan Tantangan Pembiayaan Bank Pada Bisnis Model *Multi Finance*" dari Asosiasi Perusahaan Pembiayaan Indonesia Expert Sharing Session "Opportunities and Challenges of Bank Financing in Multi Finance Business Model" from Indonesian Financing Company Association	✓	✓	✓	✓	✓
Training Outlook Ekonomi 2025 "Menyikapi Kondisi Geopolitik Baru Beserta Dampaknya secara Makro dan Mikro di Tahun 2025" dari One Point Indonesia Economic Outlook Training 2025 "Responding to New Geopolitical Conditions and Their Macro and Micro Impacts in 2025" from One Point Indonesia	✓	✓	✓	✓	✓

Program Orientasi bagi Anggota Dewan Komisaris dan Direksi yang Baru Diangkat

Bank Victoria menyelenggarakan program orientasi bagi anggota Dewan Komisaris dan Direksi yang baru diangkat. Program ini dipimpin oleh *Corporate Secretary*, dengan tujuan memberikan pemahaman mendalam mengenai visi, misi, dan nilai-nilai Bank, serta tanggung jawab dan peran Dewan Komisaris dan Direksi. Orientasi juga mencakup penjelasan mengenai struktur organisasi, strategi bisnis, dan tata kelola perusahaan yang diterapkan. Dengan demikian, anggota baru diharapkan dapat segera beradaptasi dan berkontribusi secara efektif dalam pengambilan keputusan strategis.

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

Bank Victoria holds orientation program for newly appointed members of the Board of Commissioners and Board of Directors. This program is led by the Corporate Secretary, with the aim of providing an in-depth understanding of the Bank's vision, mission, and values, as well as the responsibilities and roles of the Board of Commissioners and Board of Directors. The orientation also includes explanation of the organizational structure, business strategy, and corporate governance implemented. Thus, the new members are expected to adapt immediately and contribute effectively to strategic decision-making.

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

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

Anggota Dewan Komisaris dan Direksi dilarang berada dalam situasi di mana kepentingan pribadi mereka bertentangan dengan kepentingan Bank. Jika terjadi benturan kepentingan, anggota yang bersangkutan wajib mengungkapkannya dan tidak diperbolehkan terlibat dalam proses pengambilan keputusan yang terkait dengan konflik tersebut. Hal ini dilakukan untuk memastikan bahwa keputusan Bank tetap objektif dan berdasarkan kepentingan terbaik Bank.

Members of the Board of Commissioners and Board of Directors are prohibited from being in a situation in which their personal interests conflict with the interests of the Bank. In the event a conflict of interest occurs, the member concerned is required to disclose it and is not allowed to be involved in the decision-making process related to such conflict. This is carried out to ensure that the Bank's decisions remain objective and are based on the best interests of the Bank.

Sebagai langkah pencegahan, Bank Victoria menekankan pentingnya transparansi dengan mewajibkan pengungkapan kepentingan pribadi yang dapat memengaruhi objektivitas pengambilan keputusan. Dalam situasi benturan kepentingan, proses pengambilan keputusan akan dialihkan kepada pihak independen atau anggota lain yang tidak memiliki konflik kepentingan.

As a preventive measure, Bank Victoria emphasizes the importance of transparency by requiring disclosure of personal interests that may affect the objectivity of decision-making. In situation of any conflict of interest, the decision-making process will be transferred to an independent party or other member who has no conflict of interest.

Mekanisme Pengunduran Diri dan Pemberhentian Dewan Komisaris dan Direksi

Resignation and Dismissal Mechanism of the Board of Commissioners and Board of Directors

Mekanisme Pengunduran Diri

Berdasarkan Anggaran Dasar, mekanisme pengunduran diri Dewan Komisaris dan Direksi Bank sebagai berikut:

1. Seorang anggota Dewan Komisaris dan Direksi dapat mengundurkan diri dari jabatannya dengan menyampaikan permohonan secara tertulis kepada Bank;
2. Bank Wajib menyelenggarakan RUPS untuk memutuskan permohonan pengunduran diri anggota Direksi dalam jangka waktu 90 hari setelah diterimanya surat pengunduran diri;
3. Bank wajib melakukan keterbukaan informasi kepada masyarakat dan menyampaikan kepada Otoritas Jasa Keuangan paling lambat 2 (dua) hari kerja setelah diterimanya permohonan pengunduran diri Direksi; dan
4. Jika oleh suatu sebab jabatannya anggota Direksi kosong, dan jumlah anggota Direksi menjadi kurang dari 3 (tiga) orang, maka selambat-lambatnya 90 hari kalender setelah kekosongan itu harus diadakan RUPS untuk mengisi kekosongan tersebut dengan memperhatikan peraturan perundang-undangan yang berlaku di bidang pasar modal.

Resignation Mechanism

Based on the Articles of Association, the resignation mechanism of the Bank's Board of Commissioners and Board of Directors is as follows:

1. A member of the Board of Commissioners and Board of Directors may resign from the position by submitting a written request to the Bank;
2. The Bank is required to hold a GMS to resolve on resignation request of members of the Board of Directors within 90 days after receipt of the resignation letter;
3. The Bank is required to disclose information to the public and submit it to the Financial Services Authority no later than 2 (two) working days after receiving the request for resignation of the Board of Directors; and
4. In the event that one position of Board of Directors is vacant, and the number of the Board of Directors is less than 3 (three) members, then no later than 90 calendar days after the vacancy, a GMS must be held to fill the vacancy by considering the applicable laws and regulations in the capital market.

Mekanisme Pemberhentian

Selain mengundurkan diri dengan sukarela, Dewan Komisaris dan Direksi dapat diberhentikan sewaktu-waktu melalui mekanisme berikut:

1. Anggota Dewan Komisaris dan Direksi dapat diberhentikan untuk sementara oleh RUPS dengan dengan menyebutkan alasannya setelah anggota Dewan Komisaris dan Direksi yang bersangkutan diberi kesempatan untuk membela diri;
2. Anggota Direksi dapat diberhentikan untuk sementara oleh Dewan Komisaris dengan menyebutkan alasannya;
3. Pemberhentian sementara anggota Direksi wajib disampaikan secara tertulis;

Dismissal Mechanism

In addition to voluntarily resigning, the Board of Commissioners and Board of Directors may be dismissed at any time through the following mechanisms:

1. Members of the Board of Commissioners and Board of Directors can be suspended by the GMS by stating the reasons after the members of the Board of Commissioners and Board of Directors concerned are given a chance to defend themselves;
2. Members of the Board of Directors may be suspended by the Board of Commissioners by stating the reasons;
3. The suspension of a member of the Board of Directors must be conveyed in writing;

4. Dewan Komisaris harus menyelenggarakan RUPS untuk mencabut atau menguatkan keputusan pemberhentian sementara;
5. RUPS wajib diselenggarakan dalam jangka waktu paling lambat 90 hari setelah tanggal pemberhentian sementara;
6. Jika dalam waktu yang ditentukan RUPS tidak dapat mengambil keputusan, maka pemberhentian sementara menjadi batal;
7. Anggota Direksi yang diberhentikan sementara tidak berwenang untuk menjalankan kepengurusan Bank dan mewakili Bank di dalam maupun di luar pengadilan;
8. Batas kewenangan anggota Direksi berlaku sejak dikeluarkannya keputusan pemberhentian sementara oleh Dewan Komisaris sampai dengan dikeluarkannya keputusan RUPS yang menguatkan atau membatalkan pemberhentian sementara dan terlampauinya jangka waktu penyelenggaraan RUPS; dan
9. Apabila anggota Direksi yang diberhentikan sementara tersebut tidak hadir dalam RUPS maka anggota Direksi yang diberhentikan sementara tersebut dianggap tidak menggunakan haknya untuk membela dirinya dalam RUPS, dengan demikian anggota Direksi yang diberhentikan sementara tersebut menerima keputusan RUPS.

4. The Board of Commissioners must hold a GMS to revoke or confirm the suspension decision;
5. The GMS must be held no later than 90 days after the suspension date;
6. If within the specified time the GMS cannot adopt a resolution, then the suspension will be cancelled;
7. Members of the Board of Directors who are suspended are not authorized to carry out the management of the Bank and represent the Bank in or out of court;
8. The limits of authority of the Board of Directors' members apply from the issuance of a suspension decision by the Board of Commissioners until the issuance of a GMS resolution confirming or canceling the suspension and until the time period for holding the GMS is exceeded; and
9. If the suspended members of the Board of Directors do not attend the GMS, such members are deemed not to have exercised their right to defend themselves at the GMS, thus the suspended members of the Board of Directors accept the GMS resolutions.

Keberagaman Manajemen dan Independensi [G-01]

Management Diversity and Independence

Bank Victoria memastikan keberagaman dan independensi dalam struktur manajemen sebagai langkah mendukung keberlanjutan perusahaan dan penerapan GCG. Keberagaman ini terlihat dari representasi gender dalam Dewan Komisaris dan Direksi, serta adanya jumlah pihak independen yang tidak memiliki hubungan kepentingan dengan Pemegang Saham, manajemen, atau perusahaan, sehingga dapat menjalankan fungsi pengawasan secara netral, transparan, dan bebas dari konflik kepentingan.

Adapun informasi mengenai jumlah anggota Dewan Komisaris dan Direksi, termasuk komposisi gender dan pihak independen yang menjabat di tahun 2024, dapat dilihat pada tabel berikut:

Bank Victoria ensures diversity and independence in the management structure as a step to support the company's sustainability and the implementation of GCG. This diversity is seen from gender representation in the Board of Commissioners and Board of Directors, as well as the number of independent parties with no interest in the Shareholders, management, or the company, allowing them to perform their supervisory function neutrally, transparently, and free from any conflicts of interest.

Information on the total members of the Board of Commissioners and Board of Directors, including gender composition and independent parties serving in 2024, can be seen in the following table:

Tipe Manajemen Perusahaan Company Management Type	Pria Male	Wanita Female	Jumlah Pihak Independen Total Independent Parties
Dewan Komisaris Board of Commissioners	3	-	2
Direksi Board of Directors	4	1	-

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

Policy on Separation of Functions of President Commissioner and President Director

Untuk memastikan penerapan GCG dan mendukung keberlanjutan bisnis, Bank Victoria menerapkan kebijakan pemisahan peran antara Dewan Komisaris dan Direksi yang masing-masing dipimpin oleh Komisaris Utama dan Direktur Utama. Pemisahan peran antara pengawasan dan pengelolaan operasional tercermin dalam BOC Charter No. 001/SK-KOM/12/23 tanggal 6 Desember 2023 tentang Pedoman dan Tata Tertib Kerja *Board of Commissioners Charter* dan *BOD Charter* No. 006A/SK-DIR/12/23 tanggal 6 Desember 2023 tentang Pedoman dan Tata Tertib Kerja Direksi (*Board of Directors Charter*).

Zaenal Abidin Ph.D sebagai Komisaris Utama bertugas memimpin Dewan Komisaris untuk memastikan efektivitas pengawasan dan pemberian arahan strategis. Sementara itu, Achmad Friscantono sebagai Direktur Utama berfokus pada pengelolaan operasional perusahaan, memastikan pencapaian target kinerja, dan eksekusi strategi bisnis.

To ensure GCG implementation and support business sustainability, Bank Victoria implements the policy of separating roles between the Board of Commissioners and Board of Directors, each led by the President Commissioner and President Director. The separation of roles between supervision and operational management is reflected in BOC Charter No. 001/SK-KOM/12/23 dated 6 December 2023 on Charter and Work Guidelines of the Board of Commissioners Charter and BOD Charter No. 006A/SK-DIR/12/23 dated 6 December 2023 on Guidelines and Procedures of the Board of Directors (Board of Directors Charter).

Zaenal Abidin Ph.D as President Commissioner is in charge of leading the Board of Commissioners to ensure the effectiveness of supervision and provision of strategic direction. Meanwhile, Achmad Friscantono as President Director focuses on managing the company's operations, ensuring the achievement of performance targets, and executing business strategies.

Kebijakan Remunerasi dan Nominasi Dewan Komisaris dan Direksi

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

Kebijakan Nominasi

Bank Victoria menjalankan kebijakan nominasi Dewan Komisaris dan Direksi dengan fokus pada transparansi, integritas, dan kompetensi. Komite Remunerasi dan Nominasi bertanggung jawab menyusun sistem nominasi yang sesuai dengan prinsip GCG, yang menjadi pedoman bagi Dewan Komisaris dan RUPS dalam menetapkan nominasi serta remunerasi anggota Dewan Komisaris dan Direksi.

Proses Seleksi Calon Anggota Dewan Komisaris dan Direksi

Proses seleksi calon anggota Dewan Komisaris dan Direksi di Bank Victoria dilakukan melalui beberapa tahapan. Komite Remunerasi dan Nominasi terlebih dahulu mengidentifikasi kandidat yang memenuhi kriteria yang ditetapkan. Setelah itu, Dewan Komisaris menyampaikan kandidat terpilih kepada Pemegang

Nomination Policy

Bank Victoria implements the nomination policy for the Board of Commissioners and Board of Directors with a focus on transparency, integrity, and competency. The Remuneration and Nomination Committee is responsible for preparing nomination system in accordance with GCG principles, which serves as the guidelines for the Board of Commissioners and the GMS in determining the nomination and remuneration of members of the Board of Commissioners and Board of Directors.

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

The selection process of candidates for the Board of Commissioners and Board of Directors at Bank Victoria is carried out through several phases. The Remuneration and Nomination Committee first identifies candidates who meet the established criteria. After that, the Board of Commissioners submits the selected candidates to the

Saham berdasarkan saran dari Komite Remunerasi dan Nominasi. Proses seleksi ini dilaksanakan sebelum masa jabatan berakhir, saat diperlukan, atau ketika terjadi kekosongan di posisi Direksi.

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

Berdasarkan *BOC Charter* dan *BOD Charter* calon anggota Dewan Komisaris dan Direksi harus memenuhi syarat sebagai berikut:

1. Persyaratan Formal
   a. Cakap melakukan perbuatan hukum;
   b. Dalam 5 (lima) tahun sebelum pengangkatan dan selama menjabat:
      1) Tidak pernah dinyatakan pailit;
      2) Tidak pernah menjadi anggota Dewan Komisaris dan/ atau Direksi yang dinyatakan bersalah menyebabkan suatu bank dinyatakan pailit;
      3) Tidak pernah dihukum karena melakukan tindak pidana yang merugikan keuangan negara dan/atau yang berkaitan dengan sektor keuangan; serta
      4) Tidak pernah menjadi anggota Dewan Komisaris dan/atau Direksi yang selama menjabat:
         - Pernah tidak menyelenggarakan RUPS Tahunan;
         - Pertanggungjawabannya sebagai anggota Dewan Komisaris dan/atau Direksi pernah tidak diterima oleh RUPS atau pernah tidak memberikan pertanggungjawaban sebagai anggota Dewan Komisaris dan/atau Direksi kepada RUPS; dan
         - Pernah menyebabkan Bank yang memperoleh izin, persetujuan, atau pendaftaran dari Otoritas Jasa Keuangan tidak memenuhi kewajiban menyampaikan Laporan Tahunan dan/atau Laporan Keuangan kepada Otoritas Jasa Keuangan.
2. Persyaratan Material
   a. Mempunyai akhlak, moral, dan integritas yang baik;
   b. Memiliki komitmen untuk mematuhi peraturan perundang-undangan; dan
   c. Memiliki pengetahuan dan/atau keahlian di bidang yang dibutuhkan untuk menjalankan tugasnya.
3. Persyaratan Lainnya
   a. Anggota Dewan Komisaris tidak diperkenankan merangkap jabatan sebagai anggota Direksi, anggota Dewan Komisaris, atau Pejabat Eksekutif pada lembaga keuangan (bank atau non-bank) dan pada lebih dari 1 (satu) perusahaan bukan lembaga keuangan baik yang berkedudukan di dalam negeri atau luar negeri;
   b. Anggota Dewan Komisaris tidak termasuk rangkap jabatan apabila menjabat sebagai Direksi, anggota Dewan Komisaris, atau Pejabat Eksekutif yang melaksanakan fungsi pengawasan pada 1 (satu) Entitas Anak Bank yang dikendalikan oleh Bank (konsolidasi);
   c. Komisaris non-independen tidak termasuk rangkap jabatan dalam menjalankan tugas fungsional dari Pemegang Saham yang berbentuk badan hukum pada kelompok usaha Bank; dan

Shareholders based on the recommendations of Remuneration and Nomination Committee. This selection process is carried out prior to the end of term of office, when necessary, or when there is a vacancy in the Board of Directors position.

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

Based on the BOC Charter and BOD Charter, candidates for the Board of Commissioners and Board of Directors shall meet the following requirements:

1. Formal Requirements
   a. Capable in performing legal actions;
   b. Within 5 (five) years before appointment and during the term of office:
      1) Never been declared bankrupt;
      2) Never become a member of Board of Commissioners and/or Board of Directors who is found guilty of causing a bank to be declared bankrupt;
      3) Never been punished for committing a criminal act that is detrimental to state finances and/or related to the financial sector; and
      4) Never been a member of Board of Commissioners and/or Board of Directors who during the term of office:
         - Has ever not convening an Annual GMS;
         - Has ever had his/her accountability as the member of Board of Commissioners and/or Board of Directors rejected by the GMS or has ever been absent in giving his/her accountability as the member of Board of Commissioners and/ or Board of Directors to the GMS; and
         - Has ever caused a Bank that obtains permit, approval, or registration from the Financial Services Authority not to fulfill its obligation to submit its Annual Report and/or Financial Statements to the Financial Services Authority.
2. Material Requirements
   a. Have good character, morals, and integrity;
   b. Has a commitment to comply with the laws and regulations; and
   c. Has knowledge and/or expertise in the field required to perform the duties.
3. Other Requirements
   a. Members of the Board of Commissioners are not allowed to concurrently hold position as a member of Board of Directors, member of Board of Commissioners, or Executive Officer in other financial institutions (bank or non-bank) and in more than 1 (one) non-financial institutions, either in Indonesia or overseas;
   b. Members of the Board of Commissioners do not hold concurrent position if holding a position as the Board of Directors, members of Board of Commissioners, or Executive Officer performing the supervision function in 1 (one) of the Bank's subsidiary controlled by the Bank (consolidated);
   c. Non-independent Commissioner does not hold a concurrent position in performing its functional duty from a legal entity Shareholder in the Banking business group; and

d. Anggota Direksi dilarang memangku jabatan rangkap, apabila jabatan rangkap tersebut bertentangan dengan peraturan perundang-undangan dan/atau apabila jabatan rangkap tersebut mungkin dapat menimbulkan benturan kepentingan.

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

Sebagai lembaga keuangan yang berkomitmen terhadap GCG, Bank Victoria menempatkan pemilihan ulang Dewan Komisaris dan Direksi sebagai prioritas utama dalam menjaga keberlanjutan kinerja perusahaan. Proses ini dilaksanakan dengan mengacu pada kriteria-kriteria yang terukur dan relevan untuk memastikan kepemimpinan yang kompeten, berintegritas, dan selaras dengan kebutuhan perusahaan serta sesuai dengan keputusan RUPS.

Kebijakan Remunerasi Dewan Komisaris dan Direksi

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

Prosedur penetapan remunerasi bagi Dewan Komisaris dan Direksi sebagai berikut:

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

Prosedur Penetapan Remunerasi Dewan Komisaris dan Direksi

Prosedur penetapan remunerasi bagi Dewan Komisaris dan Direksi sebagai berikut:

1. Komite Remunerasi dan Nominasi melakukan kajian terhadap kinerja dan memberikan usulan remunerasi bagi Direksi dan Dewan Komisaris dengan memperhatikan beberapa indikator tertentu;

d. The member of Board of Directors are not allowed to hold concurrent positions if they are contrary to the laws and regulations and/or if they possibly lead to the conflict of interest.

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

As a financial institution committed to GCG, Bank Victoria places the re-election of the Board of Commissioners and Board of Directors as a top priority in maintaining the sustainability of the company's performance. This process is carried out by referring to measurable and relevant criteria to ensure competent, integrated leadership that is in line with the company's needs and in accordance with GMS resolutions.

Remuneration Policy of the Board of Commissioners and Board of Directors

The remuneration policy for the Board of Commissioners and Board of Directors is the Bank's effort to provide compensation to the Board of Commissioners and Board of Directors that is adjusted to the Bank's capabilities, while still considering the Bank's business resilience and continuity. The provision of remuneration to the Bank's Board of Commissioners and Board of Directors refers to Board of Commissioners' Decision No. 001/SK-KOM/01/24 dated 5 January 2024 on the Guidelines and Procedures of Remuneration and Nomination Committee of PT Bank Victoria International Tbk, prepared based on the Financial Services Authority Regulation No. 45/POJK.03/2015 and Financial Services Authority Circular No. 40/SEOJK.03/2016 on Implementation of Governance in Providing Remuneration for Commercial Banks.

The procedure for determining remuneration for the Board of Commissioners and Board of Directors is as follows:

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

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

The procedure for determining remuneration for the Board of Commissioners and Board of Directors is as follows:

1. The Remuneration and Nomination Committee reviews the performance and provides a remuneration proposal for the Board of Directors and Board of Commissioners by considering several specific indicators;

2. Komite Remunerasi dan Nominasi menyampaikan rekomendasi usulan jenis dan jumlah remunerasi kepada Dewan Komisaris;
3. Dewan Komisaris mengusulkan penetapan remunerasi kepada RUPS; dan
4. RUPS menetapkan besaran remunerasi bagi Dewan Komisaris dan Direksi.

Jenis dan Indikator Penetapan Remunerasi Dewan Komisaris dan Direksi

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

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

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

Pelaksanaan Kaji Ulang dan Independensi Penerapan Kebijakan Remunerasi

Untuk menjamin independensi dalam pemberian remunerasi bagi seluruh karyawan, termasuk karyawan di unit kontrol, Bank Victoria melakukan evaluasi kinerja dan penetapan remunerasi di bawah pengawasan dan kajian Komite Remunerasi dan Nominasi. Bank juga secara rutin melakukan tinjauan kebijakan remunerasi, dengan mempertimbangkan faktor-faktor seperti kinerja, risiko, kesesuaian dengan *peer group*, sasaran dan strategi jangka panjang, pemenuhan cadangan sesuai dengan regulasi yang berlaku, serta potensi pendapatan di masa depan.

Penetapan *Material Risk Takers*

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

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

2. The Remuneration and Nomination Committee submits a recommendation on the type and amount of remuneration to the Board of Commissioners;
3. The Board of Commissioners proposes the determination of remuneration to the GMS; and
4. GMS determines the remuneration amount for the Board of Commissioners and Board of Directors.

Types and Indicators to Determine Remuneration for the Board of Commissioners and Board of Directors

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

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

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

Review and Independence of Remuneration Policy Implementation

To ensure independence in providing remuneration for all employees, including employees in the control unit, Bank Victoria conducts performance evaluations and remuneration determinations under the supervision and review of the Remuneration and Nomination Committee. The Bank also regularly reviews its remuneration policy, by considering factors such as performance, risk, suitability with peer groups, long-term goals and strategies, fulfillment of reserves in accordance with the applicable regulations, and potential income in the future.

Establishing Material Risk Takers

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

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

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

Penangguhan atau Penarikan Kembali Remunerasi

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

Kaitan Remunerasi dengan Risiko dan Kinerja

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

Konsultan Terkait Kebijakan Remunerasi

Bank tidak menggunakan jasa konsultan dalam merumuskan kebijakan remunerasi.

Struktur dan Besaran Remunerasi Dewan Komisaris dan Direksi

Remunerasi bagi Dewan Komisaris dan Direksi terdiri dari 2 (dua) komponen, yaitu remunerasi tetap dan remunerasi variabel. Remunerasi tetap mencakup honorarium, manfaat seperti asuransi kesehatan, kendaraan dinas, BPJS Ketenagakerjaan, dan THR. Sementara itu, remunerasi variabel meliputi tantiem atau gratifikasi, serta saham. Pembayaran dapat dilakukan baik dalam bentuk tunai maupun non-tunai, seperti natura (rumah, kendaraan dinas, atau aset lainnya yang bisa dimiliki atau tidak). Besaran remunerasi variabel disesuaikan dengan kinerja, peran, dan tanggung jawab masing-masing anggota Dewan Komisaris dan Direksi.

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

Remuneration Suspension or Clawback

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

Connection of Remuneration with Risk and Performance

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

Consultant Regarding Remuneration Policy

The Bank has not used consultant services in formulating remuneration policies.

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

Remuneration for the Board of Commissioners and Board of Directors consists of 2 (two) components, namely fixed remuneration and variable remuneration. Fixed remuneration covers honorarium, benefits such as health insurance, official vehicles, BPJS Employment, and THR. Meanwhile, variable remuneration covers tantiem or gratification, and shares. Payments can be made either in cash or non-cash, such as natura facilities (house, official vehicle, or other assets that may or may not be owned). The amount of variable remuneration is adjusted to the performance, role, and responsibilities of each member of the Board of Commissioners and Board of Directors.

Pada tahun 2024, paket remunerasi dan fasilitas yang diterima oleh Dewan Komisaris dan Direksi mencakup struktur remunerasi dan rincian jumlah nominal, ditunjukkan sebagai berikut:

In 2024, the remuneration package and facilities received by the Board of Commissioners and Board of Directors included the remuneration structure and details of nominal amount, presented as follows:

Remunerasi Dewan Komisaris dan Direksi Berdasarkan Jenis
Remuneration for the Board of Commissioners and Board of Directors by Type

Jenis Remunerasi Type of Remuneration	Dewan Komisaris Board of Commissioners		Direksi Board of Directors	
	Orang People	Jumlah Total (Rp)	Orang People	Jumlah Total (Rp)
Remunerasi Bersifat Tetap (Gaji dan THR) Fixed Remuneration (Salary and THR Allowance)	3	3,031,705,908	5	15,376,659,071
Remunerasi Bersifat Variabel (Bonus) Variable Remuneration (Bonus)	3	230,615,892	5	1,330,039,929
Total	**3**	**3,262,321,800**	**5**	**16,706,699,000**

Remunerasi Dewan Komisaris dan Direksi Berdasarkan Bentuk
Remuneration for the Board of Commissioners and Board of Directors by Form

Bentuk Remunerasi Form of Remuneration	Dewan Komisaris Board of Commissioners		Direksi Board of Directors	
	Orang People	Jumlah Total (Rp)	Orang People	Jumlah Total (Rp)
Remunerasi dalam Bentuk Tunai Remuneration in the form of Cash	3	3,262,321,800	5	16,706,699,000
Remunerasi dalam Bentuk Natura Remuneration in the form of Natura	-	-	5	4,120,850,000
Remunerasi dalam Bentuk Saham Remuneration in the form of Shares	-	-	-	-
Total	**3**	**3,262,321,800**	**5**	**20,827,549,000**

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

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

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

Uraian Description	Total Individu Total Individual	Rata-Rata Remunerasi per Orang Average Remuneration per Person
Dewan Komisaris Board of Commissioners	3	60 juta 60 million
Direksi Board of Directors	5	170 juta 170 million

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

Uraian Description	Gaji Pokok Basic Salary (Rp)	Bonus (Rp)	Tunjangan Allowances (Rp)	Total Remunerasi Total Remuneration (Rp)
Dewan Komisaris Board of Commissioners	2,551,089,716	230,615,892	480,616,192	3,262,321,800
Direksi Board of Directors	13,228,392,793	1,330,039,929	2,148,266,278	16,706,699,000

Remunerasi yang Ditangguhkan atau Ditarik Kembali
Tidak terdapat remunerasi Dewan Komisaris dan Direksi yang ditangguhkan atau ditarik kembali di tahun 2024.

Pengungkapan Bonus Kinerja,
Bonus Non-Kinerja, dan Opsi Saham
Dewan Komisaris dan Direksi Bank tidak mendapat bonus kinerja, bonus non-kinerja, dan opsi saham di tahun 2024.

Suspended or Clawback Remuneration
There was no suspended or clawback remuneration of the Board of Commissioners and Board of Directors in 2024.

Disclosure of Performance Bonus,
Non-Perfomance Bonus, and Stock Option
The Bank's Board of Commissioners and Board of Directors did not receive performance bonus, non-performance bonus, or stock option in 2024.

Rasio Gaji Tertinggi dan Terendah
Bank Victoria menjaga transparansi dalam rasio gaji tertinggi dan terendah di seluruh tingkatan organisasi. Rasio ini ditetapkan dengan mempertimbangkan prinsip kesetaraan, kinerja, serta tanggung jawab setiap posisi. Pada tahun 2024, rasio gaji di Bank ditunjukkan sebagai berikut:

Ratio of Highest and Lowest Salary
Bank Victoria maintains transparency in the ratio of highest and lowest salaries at all levels of the organization. This ratio is determined by considering the principles of equality, performance, and responsibility of each position. In 2024, the salary ratio at the Bank was presented as follows:

Uraian	Rasio Ratio	Description
Gaji Tertinggi dan Terendah Dewan Komisaris	1:1.2	Board of Commissioners' Highest and Lowest Salary
Gaji Tertinggi dan Terendah Direksi	1:1.55	Board of Directors' Highest and Lowest Salary
Gaji Tertinggi dan Terendah Karyawan	1:17	Employees' Highest and Lowest Salary

Komite di Bawah Dewan Komisaris
Board of Commissioners' Subordinate Committees

Komite Pemantau Risiko

Komite Pemantau Risiko merupakan komite di bawah Dewan Komisaris yang memastikan manajemen risiko Bank dijalankan secara efektif dan sesuai dengan prinsip GCG. Komite Pemantau Risiko berperan dalam mengidentifikasi, mengevaluasi, dan memitigasi berbagai risiko yang dihadapi oleh Bank.

Pedoman Komite Pemantau Risiko
Komite Pemantau Risiko telah memiliki Pedoman Kerja Komite Pemantau Risiko yang terakhir kali diperbarui berdasarkan Keputusan Dewan Komisaris No. 002/SK-KOM/12/23 tanggal 6 Desember 2023 tentang Pedoman dan Tata Tertib Kerja Komite Pemantau Risiko PT Bank Victoria International Tbk.

Risk Monitoring Committee

Risk Monitoring Committee is the committee under the Board of Commissioners that ensures that the Bank's risk management is carried out effectively and in accordance with GCG principles. The Risk Monitoring Committee has roles in identifying, evaluating, and mitigating various risks faced by the Bank.

Risk Monitoring Committee Charter
Risk Monitoring Committee has the Risk Monitoring Committee Charter which was last updated based on the Board of Commissioners' Decision No. 002/SK-KOM/12/23 dated 6 December 2023 on Charter and Work Guidelines of the Risk Monitoring Committee of PT Bank Victoria International Tbk.

Tugas dan Tanggung Jawab Komite Pemantau Risiko

Komite Pemantau Risiko memiliki tugas dan tanggung jawab sebagai berikut:

1. Melakukan pengkajian ulang dan memberikan rekomendasi atas efektivitas pelaksanaan manajemen risiko Bank melalui pertemuan secara berkala maupun cara lainnya untuk membahas progres dari tahapan-tahapan tugas dan tanggung jawab yang dilakukan oleh Satuan Kerja Manajemen Risiko;
2. Melakukan pengawasan atas kegiatan Satuan Kerja Manajemen Risiko dalam memantau pelaksanaan mitigasi risiko oleh Unit-Unit Kerja terkait;
3. Melakukan pengawasan atas pelaksanaan rekomendasi Komite oleh Satuan Kerja Manajemen Risiko;
4. Melakukan analisis dan evaluasi atas usulan Rencana Kegiatan dan Anggaran Bank serta pengkajian ulang tahunan atas rencana jangka panjang Bank yang diajukan oleh Direksi; dan
5. Melakukan penelaahan atas informasi risiko dan manajemen risiko Bank dalam laporan-laporan yang akan dipublikasikan.

Komposisi dan Masa Jabatan Komite Pemantau Risiko

Komite Pemantau Risiko minimal terdiri dari 3 (tiga) orang, yaitu 1 (satu) orang di antaranya sebagai ketua yang merangkap sebagai Komisaris Independen dan 2 (dua) orang dari pihak independen sebagai anggota. Masa jabatan Komite Pemantau Risiko tidak boleh lebih lama dari masa jabatan Dewan Komisaris dan dapat dipilih kembali untuk 1 (satu) periode berikutnya.

Berikut komposisi Komite Pemantau Risiko Bank per 31 Desember 2024 yang diangkat berdasarkan Surat Keputusan Direksi No. 008/SK-DIR/03/24 tanggal 14 Maret 2024:

Duties and Responsibilities of the Risk Monitoring Committee

The Risk Monitoring Committee has duties and responsibilities as follows:

1. Reviewing and providing recommendations on the effectiveness of the Bank's risk management implementation through regular meetings or other methods to discuss the progress of duties and responsibilities carried out by the Risk Management Work Unit;
2. Overseeing activities of the Risk Management Work Unit in monitoring the implementation of risk mitigation by related Work Units;
3. Overseeing the implementation of the Committee's recommendations by the Risk Management Work Unit;
4. Performing analysis and evaluation of Bank Activity and Budget Plan proposal, as well as annual review of the Bank's long-term plan submitted by the Board of Directors; and
5. Reviewing the Bank's risk information and Bank risk management in reports to be published.

Composition and Term of Office of the Risk Monitoring Committee

The Risk Monitoring Committee consists of at least 3 (three) members, in which 1 (one) of whom is the chairman who also serves as Independent Commissioner and 2 (two) members are from independent parties. The term of office of Risk Monitoring Committee can not be longer than the term of office of the Board of Commissioners and can be re-elected for 1 (one) subsequent period.

The following is the composition of the Bank's Risk Monitoring Committee as of 31 December 2024, appointed based on Board of Directors' Decision Letter No. 008/SK-DIR/03/24 dated 14 March 2024:

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

Profil Komite Pemantau Risiko
Risk Monitoring Committee's Profile

ZAENAL ABIDIN Ph.D

Ketua
Chairman

Dasar Hukum Penunjukkan dan Periode Menjabat Dasar Pengangkatan

Basis of Appointment and Term of Office

Keputusan Direksi No. 008/SK-DIR/03/24 tanggal 14 Maret 2024 (2024-Sekarang).
Board of Directors' Decision No. 008/SK-DIR/03/24 dated 14 March 2024 (2024-Now).

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

GUNAWAN TENGGARAHARDJA

Anggota
Member

Dasar Hukum Penunjukkan dan Periode Menjabat Dasar Pengangkatan

Basis of Appointment and Term of Office

Keputusan Direksi No. 008/SK-DIR/03/24 tanggal 14 Maret 2024 (2024-Sekarang).
Board of Directors' Decision No. 008/SK-DIR/03/24 dated 14 March 2024 (2024-Now).

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

MEDI SEJATI

Anggota
Member

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Jakarta

Usia / Age
59 tahun / years old

Domisili / Domicile
Jakarta

Dasar Pengangkatan dan Periode Menjabat

Keputusan Direksi No. 008/SK-DIR/03/24 tanggal 14 Maret 2024 (2024-Sekarang).

Riwayat Pendidikan

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

Rangkap Jabatan

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

Di luar Bank Victoria:
- Anggota Komite Audit Bank Victoria Syariah (sejak 2021); dan
- Anggota Komite Pemantau Risiko Bank Victoria Syariah (sejak 2021).

Riwayat Jabatan

- Kolektor PT Jasa Marga (Persero) Tbk (1984–1986);
- *Teller* PT Bank Swadesi (1990-1991);
- Menjabat di PT Bank Intan (1991-1999) sebagai:
  - Sekretaris Kepala Biro Kredit;
  - *Internal Control Officer*;
  - Kepala Bagian Audit Kredit dan *Marketing*;
  - Kepala Bagian Kredit Support;
- Auditor Kantor Akuntan Publik Edi Kaslim & Kantor Akuntan Publik Gatot Permadi Djuwono (1999–2002);
- Kepala Bagian Akunting PT Bank Harmoni Internasional (2002–2007);
- Kepala Bagian Akunting PT Bank Index Selindo (2007–2008);
- Kepala Divisi Akunting PT Bank Swaguna (2008–2010);
- Kepala Divisi Akunting PT Bank Victoria Syariah (2010-2014);
- Akunting *Officer* Bank Victoria (2014);
- Kepala Bagian Sentral Operasional PT Bank Victoria Syariah (2014);
- Kepala Bagian *Support* Pembiayaan PT Bank Victoria Syariah (2015);
- Kepala Divisi Manajemen Risiko dan Kepatuhan PT Bank Victoria Syariah (2015-2016);
- Kepala Divisi Kepatuhan dan Sekretaris Perusahaan PT Bank Victoria Syariah (2017-2019);
- Kepala Divisi Kepatuhan PT Bank Victoria Syariah (2019-2020);
- Anggota Komite Audit PT Victoria Alife Indonesia (2021); dan
- Anggota Komite Pemantau Risiko PT Victoria Alife Indonesia (2021).

Basis of Appointment and Term of Office

Board of Directors' Decision No. 008/SK-DIR/03/24 dated 14 March 2024 (2024-Now).

Education

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

Concurrent Positions

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

Outside of Bank Victoria:
- Member of Audit Committee of Bank Victoria Syariah (since 2021); and
- Member of Risk Monitoring Committee of Bank Victoria Syariah (since 2021).

History of Positions

- Collector of PT Jasa Marga (Persero) Tbk (1984–1986);
- Teller of PT Bank Swadesi (1990-1991);
- Held positions at PT Bank Intan (1991-1999) as:
  - Secretary of Credit Bureau Head;
  - Internal Control Officer;
  - Credit and Marketing Audit Department Head;
  - Credit Support Department Head;
- Auditor of Edi Kaslim Public Accounting Firm & Gatot Permadi Djuwono Public Accounting Firm (1999–2002);
- Head of Accounting Department of PT Bank Harmoni Internasional (2002–2007);
- Head of Accounting Department of PT Bank Index Selindo (2007–2008);
- Accounting Division Head of PT Bank Swaguna (2008-2010);
- Accounting Division Head of PT Bank Victoria Syariah (2010-2014);
- Accounting Officer of Bank Victoria (2014);
- Central Operational Department Head of PT Bank Victoria Syariah (2014);
- Financing Support Department Head of PT Bank Victoria Syariah (2015);
- Risk Management and Compliance Division Head of PT Bank Victoria Syariah (2015-2016);
- Compliance Division Head and Corporate Secretary of PT Bank Victoria Syariah (2017-2019);
- Compliance Division Head of PT Bank Victoria Syariah (2019-2020);
- Member of Audit Committee of PT Victoria Alife Indonesia (2021); and
- Member of Risk Monitoring Committee of PT Victoria Alife Indonesia (2021).

Sertifikasi

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

Hubungan Afiliasi

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

Certification

- Risk Management Certification Level 1 from the Risk Management Certification Institution (2007);
- Risk Management Certification Level 2 from the Risk Management Certification Institution (2011);
- Risk Management Certification Level 3 from the Risk Management Certification (2018);
- Compliance Certification Level 1 from the Banking Professional Certification Institute (2018);
- Compliance Certification Level 2 from the Banking Professional Certification Institute (2018);
- Certification in Audit Committee Practices (CACP) (2023); and
- Certification of Risk Management - Level 5 from Sharia Financial Banking Certification Institution (2024).

Affiliation Relationship

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

YOZEF ABDULRACHMAN

Anggota
Member

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Tasikmalaya

Usia / Age
67 tahun / years old

Domisili / Domicile
Tangerang

Dasar Pengangkatan dan Periode Menjabat

Keputusan Direksi No. 008/SK-DIR/03/24 tanggal 14 Maret 2024 (2024-Sekarang).

Riwayat Pendidikan

Sarjana Matematika dari Universitas Padjadjaran (1983).

Rangkap Jabatan

Di dalam Bank Victoria:
Anggota Komite Audit (sejak 2019).

Di luar Bank Victoria:

- Konsultan dan *Trainer*/Fasilitator bidang Manajemen Risiko (sejak 2010); dan
- *Trainer* dan Fasilitator Pembekalan Sertifikasi Manajemen Risiko dan *Surveillance/Refreshment* Manajemen Risiko (sejak 2010).

Riwayat Jabatan

- Menjabat di PT Bank Dagang Negara (Persero) sebagai:
  - *Programmer III – Electronic Data Processing Desk* (1989-1990);
  - Kepala Seksi Pengembangan Sistem Aplikasi – Divisi Informasi Teknologi (1991-1994);
  - Kepala Bagian Operasi Komputer - Divisi Informasi Teknologi (1995-1996); dan
  - Kepala Bagian Dukungan Pengguna – Divisi Informasi Teknologi (1997-1998).

- Menjabat di PT Bank Mandiri (Persero) Tbk sebagai:
  - *Project Manager* Y2K (Legacy PT Bank Dagang Negara) (1999);
  - *Group Head, Branch IT Deployment – IT Retail Banking Services Delivery Division* (1999-2000);
  - Integrasi Sistem Aplikasi Core Banking (implementasi 600 cabang) (1999-2000);
  - *Senior Manager of Operational Risk Management Review – Operational Risk Department – Portfolio and Operational Risk Management Group* (2001-2004);
  - *Team Leader of Business Line II – Operational Risk Department – Portfolio and Operational Risk Management Group* (2005-2006);
  - *Team Leader of Policy – Operational Risk Department – Market and Operational Risk Group* (2007-2008); dan
  - *Team Leader of MIS – Operational Risk Department – Market and Operational Risk Group* (2009-2010).

Basis of Appointment and Term of Office

Board of Directors' Decision No. 008/SK-DIR/03/24 dated 14 March 2024 (2024-Now).

Education

Bachelor of Mathematics from Padjajaran University (1983).

Concurrent Positions

In Bank Victoria:
Member of Audit Committee (since 2019).

Outside of Bank Victoria:

- Consultant and Trainer/Facilitator of Risk Management sector (since 2010); and
- Trainer and Facilitator for Briefing of Risk Management Certification and Risk Management Surveillance/Refreshment (since 2010).

History of Positions

- Held positions at PT Bank Dagang Negara (Persero) as:
  - Programmer III - Electronic Data Processing Desk (1989-1990);
  - Head of Application System Development Section - Information Technology Division (1991-1994);
  - Head of Computer Operations Section - Information Technology Division (1995-1996); and
  - Head of User Support Section - Information Technology Division (1997-1998).

- Held positions at PT Bank Mandiri (Persero) Tbk as:
  - Y2K Project Manager (Legacy of PT Bank Dagang Negara) (1999);
  - Group Head, IT Deployment Branch – IT Retail Banking Services Delivery Division (1999-2000);
  - Core Banking Application System Integration (implementation in 600 branches) (1999-2000);
  - Senior Manager of Operational Risk Management Review – Operational Risk Department – Portfolio and Operational Risk Management Group (2001-2004);
  - Team Leader of Business Line II – Operational Risk Department – Portfolio and Operational Risk Management Group (2005-2006);
  - Team Leader of Policy – Operational Risk Department – Market and Operational Risk Group (2007-2008); and
  - Team Leader of MIS – Operational Risk Department – Market and Operational Risk Group (2009-2010).

- Konsultan Manajemen Risiko Operasional PT Bank Agro Tbk (2011);
- Konsultan Manajemen Risiko Operasional PT Bank Mutiara Tbk (2013);
- Konsultan *Mapping* dan Pengukuran Eksposur *Corporate Loans Portfolio* PT Perusahaan Gas Negara Tbk (2014);
- Konsultan PT Bank Perkreditan Rakyat Sumber Artha Waru Agung, Sidoarjo (2018); dan
- Anggota Komite Tata Kelola Terintegrasi Bank Victoria (2019).

Sertifikasi

- Sertifikat Kompetensi Metodologi Pelatihan dengan Kualifikasi/Kompetensi Instruktur, KKNI Level 4 dari Badan Nasional Sertifikasi Profesi Lembaga Sertifikasi Profesi Instruktur Kompeten Indonesia (2023); dan
- Sertifikat Kompetensi Kualifikasi 6 Bidang Manajemen Risiko Perbankan dari Badan Nasional Sertifikasi Profesi Lembaga Sertifikasi Profesi Perbankan (2024).

Hubungan Afiliasi

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

- Operational Risk Management Consultant of PT Bank Agro Tbk (2011);
- Operational Risk Management Consultant of PT Bank Mutiara Tbk (2013);
- Consultant for Mapping and Corporate Loans Portfolio Exposure Measurement of PT Perusahaan Gas Negara Tbk (2014);
- Consultant of PT Bank Perkreditan Rakyat Sumber Artha Waru Agung, Sidoarjo (2018); and
- Member of the Integrated Governance Committee of Bank Victoria (2019).

Certification

- Competence Certificate in Training Methodology with Instructor Qualification/Competence, KKNI Level 4 from National Professional Certification Agency of the Indonesian Competent Instructor Professional Certification Institute (2023); and
- Competence Certificate in Banking Risk Management Qualification 6 from National Professional Certification Agency, Banking Profession Certification Institute (2024).

Affiliation Relationship

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

Independensi Komite Pemantau Risiko

Seluruh anggota Komite Pemantau Risiko telah memenuhi aspek independensi berikut:

1. Tidak memiliki hubungan keuangan dengan Dewan Komisaris, Direksi, serta Pemegang Saham Utama dan Pengendali;
2. Tidak memiliki hubungan kepemilikan saham di Bank, baik secara langsung maupun tidak langsung;
3. Tidak memiliki hubungan kepengurusan di Bank, Entitas Anak, maupun perusahaan afiliasi;
4. Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, Pemegang Saham Utama dan Pengendali, dan/atau sesama anggota Komite Pemantau Risiko; dan
5. Tidak menjabat sebagai pengurus partai politik, pejabat, dan pemerintah.

Rapat Komite Pemantau Risiko

Komite Pemantau Risiko wajib mengadakan rapat paling sedikit 12 (dua belas) kali dalam 1 (satu) tahun. Teknis pelaksanaan rapat dapat dilakukan secara langsung maupun secara *teleconference* yang dihadiri minimal 51% dari jumlah anggota termasuk seorang Komisaris Independen dan pihak independen.

Selama tahun 2024, Komite Pemantau Risiko telah melaksanakan rapat dengan rincian kehadiran masing-masing anggota sebagai berikut:

Independency of Risk Monitoring Committee

All members of the Risk Monitoring Committee have fulfilled the following independency aspects:

1. Does not have financial relationship with the Board of Commissioners, Board of Directors, and Main and Controlling Shareholders;
2. Does not have share ownership relationship in the Bank, either directly or indirectly;
3. Does not have management relationship in the Bank, Subsidiary, and affiliated company;
4. Does not have family relationship with the Board of Commissioners, Board of Directors, Main and Controlling Shareholders, and/or among members of Risk Monitoring Committee; and
5. Does not hold position as administrator of political party, state, and government.

Risk Monitoring Committee's Meeting

The Risk Monitoring Committee shall hold at least 12 (twelve) meetings in 1 (one) year. Technically, meeting can be conducted in person or via teleconference, attended by at least 51% of the total members, including one Independent Commissioner and independent party.

Throughout 2024, the Risk Monitoring Committee held meetings with details of each member's attendance as follows:

Nama Name	Jabatan Position	Total Rapat Total Meetings	Total Kehadiran Total Attendance	Tingkat Kehadiran Attendance Rate (%)
Zaenal Abidin Ph.D	Ketua Chairman	12	12	100.00
Gunawan Tenggarahardja	Anggota Member	12	11	91.67
Medi Sejati	Anggota Member	12	12	100.00
Yozef Abdulrachman	Anggota Member	12	12	100.00

Agenda Rapat Komite Pemantau Risiko

Agenda yang dibahas dalam rapat Komite Pemantau Risiko meliputi:

1. Evaluasi Laporan Profil Risiko (triwulanan);
2. Pembahasan Tingkat Kesehatan Bank (semesteran);
3. Evaluasi Laporan Direktur Kepatuhan (semesteran);
4. Pembahasan Temuan Hasil Pemeriksaan Otoritas Jasa Keuangan 2024;
5. Kajian *Risk and Control Self-Assessment* (RCSA) bisnis dan operasional (Oktober 2024); dan
6. Pembahasan *Risk register* dan Profil Risiko Operasional untuk Divisi IT dan Divisi HCM (November 2024).

Laporan Singkat Pelaksanaan Kegiatan Komite Pemantau Risiko Tahun 2024

Sepanjang tahun 2024, Komite Pemantau Risiko telah melaksanakan kegiatan sebagai bentuk pelaksanaan tugas dan tanggung jawabnya yang diuraikan sebagai berikut:

1. Mengadakan rapat dan reviu terhadap efektivitas pelaksanaan manajemen risiko dan kepatuhan Bank;
2. Melakukan reviu atas penilaian risiko oleh Satuan Kerja Manajemen Risiko serta Laporan Kepatuhan oleh Divisi Kepatuhan, termasuk pemantauan mitigasi oleh *Risk Taking Unit*;
3. Mengawasi pelaksanaan rekomendasi komite oleh Satuan Kerja Manajemen Risiko dan/atau Divisi Kepatuhan;
4. Menelaah informasi risiko dan manajemen risiko Bank dalam laporan-laporan yang dipublikasikan;
5. Memastikan kepatuhan terhadap peraturan perundang-undangan dan ketentuan yang berlaku; dan
6. Pelaksanakan tugas khusus dan tugas lainnya sesuai dengan kebutuhan.

Selain itu, Komite Pemantau Risiko juga telah melakukan penelaahan dan peninjauan melalui analisa laporan maupun rapat, yang hasilnya disampaikan kepada Dewan Komisaris melalui Memo Intern. Beberapa hal yang dikaji meliputi Laporan Tahunan Komite Pemantau Risiko tahun 2024, Laporan Tingkat Kesehatan Bank Periode Semester II Tahun 2023, serta Laporan Direktur Kepatuhan Periode Semester II Tahun 2023. Komite juga memberikan berbagai arahan hasil penelaahan terkait profil risiko, manajemen risiko, kepatuhan, serta temuan hasil pemeriksaan Otoritas Jasa Keuangan sepanjang tahun 2024.

Pelatihan dan/atau Peningkatan Komite Pemantau Risiko

Pada tahun 2024, pengembangan kompetensi yang diikuti oleh Bapak Zaenal Abidin Ph.D dan Bapak Gunawan Tenggarahardja dapat dilihat pada pelatihan dan/atau peningkatan kompetensi

Risk Monitoring Committee's Meeting Agenda

The agenda discussed in the Risk Monitoring Committee's meeting covers:

1. Evaluation of Risk Profile Report (quarterly);
2. Discussion of Bank Sound Level (semi-annually);
3. Evaluation of Compliance Director's Report (semi-annually);
4. Discussion of Findings of Financial Services Authority's Audit Results in 2024;
5. Review of Risk and Control Self-Assessment (RCSA) business and operations (October 2024); and
6. Discussion of Risk register and Operational Risk Profile for IT Division and HCM Division (November 2024).

Brief Report on Implementation of Risk Monitoring Committee's Activities in 2024

Throughout 2024, the Risk Monitoring Committee carried out activities as the implementation of its duties and responsibilities as described below:

1. Holding meetings and reviews on the effectiveness of the Bank's risk management and compliance implementation;
2. Reviewing risk assessment by the Risk Management Work Unit and Compliance Report by the Compliance Division, including monitoring mitigation by the Risk Taking Unit;
3. Supervising the implementation of committee recommendations by the Risk Management Work Unit and/or Compliance Division;
4. Reviewing the Bank's risk and risk management information in published reports;
5. Ensuring compliance with applicable laws and regulations; and
6. Implementing specific duty and other duties as needed.

Furthermore, the Risk Monitoring Committee also conducted assessment and review through report analysis and meetings, the results of which were submitted to the Board of Commissioners through Internal Memo. Several matters reviewed included the Risk Monitoring Committee's Annual Report for 2024, the Bank's Sound Level Report for Semester II of 2023, and the Compliance Director's Report for Semester II of 2023. The Committee also provided various directions on the results of review related to risk profile, risk management, compliance, and findings from the Financial Services Authority's audit results throughout 2024.

Risk Monitoring Committee's Training and/or Development Programs

In 2024, the competency development attended by Mr. Zaenal Abidin Ph.D and Mr. Gunawan Tenggarahardja was presented in the training and/or competency development of the Board

Dewan Komisaris. Sementara pengembangan kompetensi yang diikuti anggota lainnya ditunjukkan sebagai berikut:

of Commissioners. Meanwhile, the competency development attended by other members is presented as follows:

Materi Pelatihan dan Penyelenggara Training Materials and Organizers	Kehadiran Attendance	
	Medi Sejati	Yozef Abdulrachman
Pelatihan Manajemen Audit Internal Sesuai dengan The Institute of Internal Auditors Global Internal Audit 2024 dari Sekolah Vokasi Universitas Gadjah Mada Internal Audit Management Training in accordance with The Institute of Internal Auditors Global Internal Audit 2024 from the Vocational School of Gadjah Mada University	✓	✓
Refreshment Sistem Manajemen Risiko Jenjang 5 dari PT Efektifpro Knowledge Source Refreshment of Risk Management System Level 5 from PT Efektifpro Knowledge Source	✓	✓

Komite Remunerasi dan Nominasi

Komite Remunerasi dan Nominasi dibentuk untuk mengkaji dan memberikan rekomendasi kepada Dewan Komisaris dalam hal mengawasi proses implementasi kebijakan nominasi dan remunerasi bagi Dewan Komisaris dan Direksi, sebagai upaya mencapai penerapan GCG.

Pedoman Komite Remunerasi dan Nominasi

Komite Remunerasi dan Nominasi telah memiliki Pedoman Kerja Komite Remunerasi dan Nominasi yang terakhir kali diperbarui berdasarkan Keputusan Dewan Komisaris No. 001/SK-KOM/01/24 tanggal 5 Januari 2024 tentang Pedoman dan Tata Tertib Komite Remunerasi dan Nominasi PT Bank Victoria International Tbk.

Tugas dan Tanggung Jawab Komite Remunerasi dan Nominasi

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

1. Kebijakan Nominasi:
   a. Menyusun dan merekomendasikan sistem dan prosedur pemilihan atau penggantian anggota Dewan Komisaris dan Direksi kepada Dewan Komisaris untuk disampaikan kepada RUPS;
   b. Memberikan rekomendasi tentang calon anggota Dewan Komisaris dan/atau Direksi kepada Dewan Komisaris untuk disampaikan kepada RUPS;
   c. Memberikan rekomendasi kepada Dewan Komisaris mengenai pihak independen yang akan menjadi anggota Komite Audit serta anggota Komite Pemantau Risiko; dan
   d. Menyusun mekanisme dan melakukan penilaian kinerja Direksi dan Dewan Komisaris.

2. Kebijakan Remunerasi:
   a. Menyusun dan mengevaluasi remunerasi untuk anggota Dewan Komisaris, Direksi, dan Pejabat Eksekutif hingga 1 (satu) tingkat di bawah Direksi;
   b. Memberikan rekomendasi kepada Dewan Komisaris mengenai kebijakan remunerasi untuk Dewan Komisaris dan Direksi yang akan disampaikan kepada RUPS, serta

Remuneration and Nomination Committee

The Remuneration and Nomination Committee is established to review and provide recommendations to the Board of Commissioners in overseeing the process of implementing nomination and remuneration policies for the Board of Commissioners and Board of Directors, as an effort to achieve GCG implementation.

Remuneration and Nomination Committee Charter

The Remuneration and Nomination Committee has the Remuneration and Nomination Committee Charter which was last updated based on the Board of Commissioners' Decision Letter No. 001/SK-KOM/01/24 dated 5 January 2024 on the Guidelines and Procedures of Remuneration and Nomination Committee of PT Bank Victoria International Tbk.

Duties and Responsibilities of Remuneration and Nomination Committee

The Remuneration and Nomination Committee has duties and responsibilities as follows:

1. Nomination Policy:
   a. To prepare and recommend system and procedure of selection or replacement of members of Board of Commissioners and Board of Directors to the Board of Commissioners to be proposed to the GMS;
   b. To give recommendations about the candidates for the Board of Commissioners and/or Board of Directors to the Board of Commissioners to be proposed to the GMS;
   c. To give recommendations to the Board of Commissioners on independent party who will become member of Audit Committee and member of Risk Monitoring Committee; and
   d. To develop mechanisms and assess the performance of the Board of Directors and Board of Commissioners.

2. Remuneration Policy:
   a. To prepare and evaluate remuneration for members of the Board of Commissioners, Board of Directors, and Executive Officers up to 1 (one) level below the Board of Directors;
   b. To give recommendations to the Board of Commissioners on remuneration policy for the Board of Commissioners and Board of Directors to be proposed to the GMS, and

kebijakan remunerasi untuk Pejabat Eksekutif hingga 1 (satu) tingkat di bawah Direksi yang akan disampaikan kepada Direksi; dan

c. Dalam pelaksanaan tugas remunerasi, memperhatikan kinerja keuangan, pemenuhan cadangan sesuai peraturan perundang-undangan, prestasi kerja individu, kewajaran dengan *peer group*, dan pertimbangan terhadap sasaran dan strategi jangka panjang Bank.

3. Tugas Lainnya:
   a. Membantu Dewan Komisaris dalam memberikan rekomendasi tentang jumlah anggota Dewan Komisaris dan Direksi; dan
   b. Membantu Direksi dalam mengevaluasi sistem *Human Capital Management & General Affair*, serta kebijakan pengembangan sumber daya manusia, termasuk rekrutmen, asesmen, peningkatan kompetensi, evaluasi, promosi, demosi, terminasi, suksesi, seleksi, dan tugas lainnya.

remuneration policy for Executive Officers up to 1 (one) level below the Board of Directors to be proposed to the Board of Directors; and

c. In performing remuneration duty, consider financial performance, fulfillment of reserve in accordance with laws and regulations, individual work achievement, fairness with peer group, and consideration of the Bank's long-term goals and strategies.

3. Other Duties:
   a. To assist the Board of Commissioners in giving recommendations about the number of members of the Board of Commissioners and Board of Directors; and
   b. To assist the Board of Directors in evaluating the Human Capital Management & General Affair system, and human capital development policy, including recruitment, assessment, competency development, evaluation, promotion, demotion, termination, succession, selection, and other duties.

Komposisi dan Masa Jabatan Komite Remunerasi dan Nominasi

Komite Remunerasi dan Nominasi minimal terdiri dari 1 (satu) orang Komisaris Independen, 1 (satu) orang Komisaris, dan 1 (satu) orang Pejabat Eksekutif yang membawahi Divisi *Human Capital Management*. Masa jabatan Komite Remunerasi dan Nominasi tidak boleh lebih lama dari masa jabatan Dewan Komisaris dan dapat dipilih kembali untuk periode berikutnya.

Berikut komposisi Komite Remunerasi dan Nominasi Bank per 31 Desember 2024 yang diangkat berdasarkan Keputusan Direksi No. 002C/DIR-EKS/11/22 tanggal 9 November 2022:

Composition and Term of Office of the Remuneration and Nomination Committee

The Remuneration and Nomination Committee consists of at least 1 (one) Independent Commissioner, 1 (one) Commissioner, and 1 (one) Executive Officer in charge of the Human Capital Management Division. The term of office of Remuneration and Nomination Committee can not be longer than the term of office of the Board of Commissioners and can be re-elected for the next period.

The following is the composition of the Bank's Remuneration and Nomination Committee as of 31 December 2024, appointed based on Board of Directors' Decision No. 002C/DIR-EKS/11/22 dated 9 November 2022:

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

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

GUNAWAN TENGGARAHARDJA

Ketua
Chairman

Dasar Hukum Penunjukkan dan Periode Menjabat Dasar Pengangkatan

Basis of Appointment and Term of Office

Keputusan Direksi No. 002C/DIR-EKS/11/22 tanggal 9 November 2022 (2022-Sekarang).
Board of Directors' Decision No. 002C/DIR-EKS/11/22 dated 9 November 2022 (2022-Now).

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

SIA LENG HO

Anggota
Member

Dasar Hukum Penunjukkan dan Periode Menjabat Dasar Pengangkatan
Basis of Appointment and Term of Office

Keputusan Direksi No. 002C/DIR-EKS/11/22 tanggal 9 November 2022 (2022-Sekarang).
Board of Directors' Decision No. 002C/DIR-EKS/11/22 dated 9 November 2022 (2022-Now).

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

SYAHDA CANDRA

Anggota
Member

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Jakarta

Usia / Age
51 tahun / years old

Domisili / Domicile
Jakarta

Dasar Pengangkatan dan Periode Menjabat

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

Riwayat Pendidikan

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

Rangkap Jabatan

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

Di luar Bank Victoria:
Tidak ada.

Riwayat Jabatan

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

Sertifikasi

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

Hubungan Afiliasi

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

Basis of Appointment and Term of Office

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

Education

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

Concurrent Positions

In Bank Victoria:
Head of Human Capital Management & General Affair Division of Bank Victoria (since 2019).

Outside of Bank Victoria:
None.

History of Positions

- Senior Staff of Human Resource Department (Recruitment and Manpower) of PT Bank Ekonomi Raharja Tbk (1997-2000);
- Assistant Manager of Human Resource Department of PT Hawaii Confectionery Factory (2001-2002);
- Supervisor of Human Resource Department of PT JS Multi Collection (2002-2003); and
- Held positions at Bank Victoria as:
  - Head of Human Resources and General Affair Division (2003-2012);
  - Head of Human Capital Management Division (2012-2017); and
  - Head of Human Resources and General Affair Division (2019).

Certification

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

Affiliation Relationship

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

Independensi Komite Remunerasi dan Nominasi

Seluruh anggota Komite Remunerasi dan Nominasi telah memenuhi aspek independensi berikut:

1. Tidak memiliki hubungan keuangan dengan Dewan Komisaris, Direksi, serta Pemegang Saham Utama dan Pengendali;
2. Tidak memiliki hubungan kepemilikan saham di Bank, baik secara langsung maupun tidak langsung;
3. Tidak memiliki hubungan kepengurusan di Bank, Entitas Anak, maupun perusahaan afiliasi;
4. Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, Pemegang Saham Utama dan Pengendali, dan/atau sesama anggota Komite Remunerasi dan Nominasi; dan
5. Tidak menjabat sebagai pengurus partai politik, pejabat, dan pemerintah.

Rapat Komite Remunerasi dan Nominasi

Komite Remunerasi dan Nominasi wajib mengadakan rapat paling sedikit 4 (empat) kali dalam 1 (satu) tahun. Teknis pelaksanaan rapat dapat dilakukan secara langsung maupun secara *teleconference* yang dihadiri minimal 51% dari jumlah anggota termasuk seorang Komisaris Independen dan Pejabat Eksekutif.

Selama tahun 2024, Komite Remunerasi dan Nominasi telah melaksanakan rapat dengan rincian kehadiran masing-masing anggota sebagai berikut:

Independency of Remuneration and Nomination Committee

All members of the Remuneration and Nomination Committee have fulfilled the following independency aspects:

1. Does not have financial relationship with the Board of Commissioners, Board of Directors, and Main and Controlling Shareholders;
2. Does not have share ownership relationship in the Bank, either directly or indirectly;
3. Does not have management relationship in the Bank, Subsidiary, and affiliated company;
4. Does not have family relationship with the Board of Commissioners, Board of Directors, Main and Controlling Shareholders, and/or among members of Remuneration and Nomination Committee; and
5. Does not hold position as administrator of political party, state, and government.

Remuneration and Nomination Committee's Meeting

The Remuneration and Nomination Committee shall hold at least 4 (four) meetings 1 (one) year. Technically, meeting can be conducted in person or via teleconference, attended by at least 51% of the total members, including one Independent Commissioner and Executive Officer.

Throughout 2024, the Remuneration and Nomination Committee held meetings with details of each member's attendance as follows:

Nama Name	Jabatan Position	Total Rapat Total Meetings	Total Kehadiran Total Attendance	Tingkat Kehadiran Attendance Rate (%)
Gunawan Tenggarahardja	Ketua Chairman	5	5	100.00
Sia Leng Ho	Anggota Member	5	5	100.00
Syahda Candra	Anggota Member	5	5	100.00

Agenda Rapat Komite Remunerasi dan Nominasi

Agenda yang dibahas dalam rapat Komite Remunerasi dan Nominasi mencakup evaluasi kebutuhan advisor bidang *international banking* serta pembahasan terkait kenaikan gaji bagi pengurus dan karyawan. Selain itu, rapat juga membahas kebijakan pedoman gratifikasi atau bonus tahun 2023-2024 bagi pengurus dan pegawai Bank yang akan direkomendasikan kepada Dewan Komisaris. Komite turut memberikan rekomendasi mengenai penambahan Divisi *Marketing Communication, Product & Digital Marketing*, termasuk pencalonan Kepala Divisi atas nama Wirindra Ananda Gupta. Selain itu, dilakukan evaluasi terhadap komposisi Direksi dan Pejabat Eksekutif.

Remuneration and Nomination Committee's Meeting Agenda

Agenda discussed in the Remuneration and Nomination Committee's meeting includes evaluation of the need for advisor in international banking sector and discussion related to salary increase for management and employees. In addition, the meeting also discussed the policy on 2023-2024 gratification or bonus guidelines for the Bank's management and employees to be recommended to the Board of Commissioners. The Committee also provided recommendations on the addition of Marketing Communication, Product & Digital Marketing Division, including the nomination of Division Head on behalf of Wirindra Ananda Gupta. Furthermore, evaluation was carried out on the composition of the Board of Directors and Executive Officers.

Laporan Singkat Pelaksanaan Kegiatan Komite Remunerasi dan Nominasi Tahun 2024

Sepanjang tahun 2024, Komite Remunerasi dan Nominasi telah melaksanakan kegiatan sebagai bentuk pelaksanaan tugas dan tanggung jawabnya yang diuraikan sebagai berikut:

1. Evaluasi kebutuhan advisor bidang *international banking*;
2. Rekomendasi penambahan Divisi *Marketing Communication, Product & Digital Marketing* serta pencalonan Kepala Divisi atas nama Wirindra Ananda Gupta; dan
3. Evaluasi komposisi Direksi dan Pejabat Eksekutif.

Brief Report on Implementation of Remuneration and Nomination Committee's Activities in 2024

Throughout 2024, the Remuneration and Nomination Committee carried out activities as the implementation of its duties and responsibilities as described below:

1. Evaluation of the need for advisor in international banking sector;
2. Recommendation for the addition of Marketing Communication, Product & Digital Marketing Division and the nomination of Division Head on behalf of Wirindra Ananda Gupta; and
3. Evaluation of the composition of Board of Directors and Executive Officers.

Pelatihan dan/atau Peningkatan Komite Remunerasi dan Nominasi

Pada tahun 2024, pengembangan kompetensi yang diikuti oleh Bapak Gunawan Tenggarahardja dan Bapak Sia Leng Ho dapat dilihat pada pelatihan dan/atau peningkatan kompetensi Dewan Komisaris. Sementara Pengembangan kompetensi yang diikuti anggota lainnya ditunjukkan sebagai berikut:

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

In 2024, the competency development attended by Mr. Gunawan Tenggarahardja and Mr. Sia Leng Ho was presented in the training and/or competency development of the Board of Commissioners. Meanwhile, the competency development attended by other members is presented as follows:

Materi Pelatihan dan Penyelenggara **Training Materials and Organizers**	**Kehadiran** **Attendance**
	Syahda Candra
Expert Sharing: Keuangan Berkelanjutan dari Agus Sugiarto Expert Sharing: Sustainable Finance from Agus Sugiarto	✓
Dealing with Volatility, Uncertainty, Complexity, and Ambiguity (VUCA) Challenges: Contextual Leadership Journey dari Bank Victoria Dealing with Volatility, Uncertainty, Complexity, and Ambiguity (VUCA) Challenges: Contextual Leadership Journey from Bank Victoria	✓
Refreshment Unit Kompetensi Manajemen Risiko Jenjang 5 dari PT Efektifpro Knowledge Source Refreshment of Level 5 Risk Management Competency Unit from PT Efektifpro Knowledge Source	✓
Pembekalan: Pendampingan dan Mekanisme Pelaksanaan Resertifikasi Manajemen Risiko Jenjang 5 dari Bank Victoria Briefing: Mentoring and Mechanism for Implementing Recertification of Risk Management Level 5 from Bank Victoria	✓
Training Sosialisasi Office 365 dari Bank Victoria Office 365 Dissemination Training from Bank Victoria	✓
Sharing Session Market Update and Economic Outlook dari Bank Victoria Sharing Session Market Update and Economic Outlook from Bank Victoria	✓
Training Perlindungan Konsumen dan Perlindungan Data Pribadi dari Bank Victoria Training on Consumer Protection and Personal Data Protection from Bank Victoria	✓
Fraud Risk Management sebagai Upaya Mitigasi *Fraud* yang Efektif dan Penerapan Strategi *Anti-Fraud* di Lembaga Jasa Keuangan sesuai Peraturan Otoritas Jasa Keuangan No. 12 Tahun 2024 dari Lembaga Pengembangan Perbankan Indonesia Fraud Risk Management as Effective Fraud Mitigation Effort and Implementation of Anti-Fraud Strategies in Financial Services Institutions according to Financial Services Authority Regulation No. 12 of 2024 from Indonesian Banking Development Institute	✓
Webinar Mengelola Data Karyawan Pasca Berlakunya Undang-Undang Perlindungan Data Pribadi dari Dunia HR Webinar on Managing Employee Data After the Enactment of Personal Data Protection Law from HR World	✓
Refreshment Tipologi Tindak Pidana Pencucian Uang/Tindak Pidana Pendanaan Terorisme/Pencegahan dan Pemberantasan Pendanaan Senjata Pemusnah Massal melalui Kredit dan *Treasury* dari Andara Sarana Refreshment on Typology of Money Laundering Crimes/Terrorist Financing Crimes/Prevention and Eradication of Weapons of Mass Destruction Financing through Credit and Treasury from Andara Sarana	✓
Training Indonesia Human Capital Beyond and Summit dari Qubisa Anugrah Indonesia Training Indonesia Human Capital Beyond and Summit from Qubisa Anugrah Indonesia	✓

Komite Audit

Komite Audit merupakan komite di bawah Dewan Komisaris yang berfungsi untuk mengawasi efektivitas sistem pengendalian internal dan sistem manajemen risiko, pelaksanaan audit, serta implementasi GCG.

Pedoman Komite Audit

Komite Audit telah memiliki Piagam Komite Audit yang terakhir kali diperbarui berdasarkan Keputusan Dewan Komisaris No. 001/SK-KOM/12/23 tanggal 6 Desember 2023 tentang Piagam dan Pedoman Kerja Komite Audit PT Bank Victoria International Tbk.

Tugas dan Tanggung Jawab Komite Audit

Komite Audit telah melakukan tindakan sebagaimana dimaksud dalam Pasal 10 Peraturan Otoritas Jasa Keuangan No. 55/POJK.04/2015 tentang Pembentukan dan Pedoman Pelaksanaan Kerja Komite Audit terkait dengan penyusunan dan penerbitan Laporan Keuangan Tahunan per 31 Desember 2024 dan Laporan Tahunan 2024. Dalam pelaksanaan tugas tersebut, Komite Audit telah melaksanakan pengkajian terhadap Laporan Keuangan, melakukan pembahasan dengan manajemen, memberikan rekomendasi kepada Dewan Komisaris mengenai penunjukan akuntan publik yang didasarkan pada independensi, ruang lingkup penugasan, dan imbalan jasa serta berkomunikasi dengan akuntan publik yang ditunjuk untuk audit Laporan Keuangan Tahunan 2024. Sebagai bagian dari proses tersebut, Komite Audit telah menyelenggarakan rapat internal serta rapat dengan akuntan publik dan pihak terkait lainnya.

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

1. Melakukan penelaahan dan klarifikasi atas informasi keuangan yang akan dikeluarkan Bank atau perusahaan publik kepada publik dan/atau pihak otoritas;
2. Melakukan seleksi, penunjukan, dan pengawasan pekerjaan auditor independen;
3. Mengevaluasi efektivitas pelaksanaan pekerjaan auditor independen;
4. Melakukan seleksi, penunjukan, dan pengawasan pekerjaan Auditor Independen terkait kinerja SKAI 3 (tiga) tahunan;
5. Melakukan penelaahan atas pelaksanaan pemeriksaan oleh auditor internal dan mengawasi pelaksanaan tindak lanjut oleh Direksi atas temuan auditor internal;
6. Mengevaluasi efektivitas pengendalian internal;
7. Memastikan kegiatan operasi bank dijalankan dengan mematuhi peraturan perundang-undangan yang berlaku;
8. Melakukan koordinasi dengan Komite Manajemen Risiko dalam hal pemantauan risiko dan mitigasinya; dan
9. Melakukan penilaian sendiri terhadap efektivitas pelaksanaan tugas Komite Audit.

Audit Committee

Audit Committee is the committee under the Board of Commissioners that functions to oversee the effectiveness of internal control system and risk management system, audit implementation, and GCG implementation.

Audit Committee Charter

The Audit Committee has Audit Committee Charter which was last updated based on the Board of Commissioners' Decision No. 001/SK-KOM/12/23 dated 6 December 2023 on Charter and Work Guidelines of the Audit Committee of PT Bank Victoria International Tbk.

Duties and Responsibilities of Audit Committee

The Audit Committee has taken actions as referred to in Article 10 of Financial Services Authority Regulation No. 55/POJK.04/2015 on Establishment and Guideline for Duty Implementation of Audit Committee related to the preparation and issuance of Annual Financial Statements as of 31 December 2024 and the 2024 Annual Report. In performing these duties, the Audit Committee reviewed the Financial Statements, held discussions with management, provided recommendations to the Board of Commissioners regarding the appointment of public accountant based on independence, scope of assignment, and service fees, and communicated with the public accountant appointed to audit the 2024 Annual Financial Statements. As part of such process, the Audit Committee held internal meetings and meetings with public accountants and other related parties.

Duties and responsibilities of the Audit Committee include the following:

1. Reviewing and clarifying the financial information to be issued by the Bank or public company to the public and/or authorities;
2. Selecting, appointing, and monitoring independent auditor's work;
3. Evaluating the effectiveness of implementation of independent auditor function;
4. Selecting, appointing, and monitoring Independent Auditor's work related to triennial SKAI performances 3 (three) years);
5. Reviewing the audit conducted by internal auditor and supervising the follow up conducted by the Board of Directors on internal auditor findings;
6. Evaluating the effectiveness of internal control;
7. Ensuring the bank's operational activities are carried out in compliance with the applicable laws and regulations;
8. Coordinating with the Risk Management Committee in risk monitoring and mitigation; and
9. Conducting self-assessment on the effectiveness of implementation of Audit Committee's duties.

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

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

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

Komposisi dan Masa Jabatan Komite Audit

Komite Audit minimal terdiri dari 1 (satu) orang Komisaris Independen sebagai ketua dan 2 (dua) orang pihak independen yang memiliki keahlian di bidang keuangan, hukum, dan perbankan sebagai anggota. Masa jabatan anggota Dewan Komisaris yang merangkap sebagai anggota Komite Audit sama dengan masa kerja penunjukannya sebagai anggota Dewan Komisaris yang ditentukan oleh RUPS. Sedangkan, masa jabatan Komite Audit yang bukan merupakan anggota Dewan Komisaris tidak boleh lebih lama dari masa jabatan Dewan Komisaris.

Berikut komposisi Komite Audit Bank per 31 Desember 2024 yang diangkat berdasarkan Keputusan Direksi No. 002A/SK-DIR/11/22 tanggal 9 November 2022:

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

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

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

Composition and Term of Office of the Audit Committee

The Audit Committee consists of at least 1 (one) Independent Commissioner as chairman and 2 (two) members of independent parties with expertise in finance, legal, and banking. The term of office of Board of Commissioners' members who concurrently serve as member of Audit Committee are the same as the term of office of the appointment as the Board of Commissioners' members as determined by the GMS. Meanwhile, the term of office of Audit Committee who are not members of Board of Commissioners can not be longer than the Board of Commissioners' term of office.

The following is the composition of the Bank's Audit Committee as of 31 December 2024, appointed based on Board of Directors' Decision No. 002A/SK-DIR/11/22 dated 9 November 2022:

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

Saat ini, Bank memiliki 2 (dua) orang Komisaris Independen sesuai dengan Peraturan Otoritas Jasa Keuangan No. 17 Pasal 64 ayat 4, salah satu Komisaris Independen tersebut menjabat sebagai Ketua Komite Audit. Meski Ketua Komite Audit juga menjabat sebagai Komisaris Utama Independen, Bank tetap menjamin bahwa tugas dan tanggung jawab yang diemban dijalankan secara independen, sesuai

At this time, the Bank has 2 (two) Independent Commissioners in line with Financial Services Authority Regulation No. 17 Article 64 paragraph 4, one of the Independent Commissioners serves as the Chairman of Audit Committee. Though the Audit Committee's Chairman also serves as Independent President Commissioner, the Bank still guarantees that the duties and responsibilities held

dengan prinsip GCG. Dengan demikian, integritas dan objektivitas dalam pengawasan serta pelaksanaan fungsi audit internal tetap terjaga demi menjaga kepentingan seluruh pemangku kepentingan.

Profil Komite Audit

Profil Komite Audit telah disampaikan pada Profil Dewan Komisaris dan profil Komite Pemantau Risiko.

Independensi Komite Audit

Seluruh anggota Komite Audit telah bertindak secara independen tanpa adanya intervensi dari pihak manapun yang tercermin dalam pemenuhan aspek independensi oleh seluruh anggota Komite Audit yang diungkapkan sebagai berikut:

1. Tidak memiliki hubungan keuangan dengan Dewan Komisaris, Direksi, serta Pemegang Saham Utama dan Pengendali;
2. Tidak memiliki hubungan kepemilikan saham di Bank, baik secara langsung maupun tidak langsung;
3. Tidak memiliki hubungan kepengurusan di Bank, Entitas Anak, maupun perusahaan afiliasi;
4. Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, Pemegang Saham Utama dan Pengendali, dan/atau sesama anggota Komite Audit; dan
5. Tidak menjabat sebagai pengurus partai politik, pejabat, dan pemerintah.

Rapat Komite Audit

Berdasarkan Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023, Komite Audit diwajibkan untuk melaksanakan rapat minimal sebulan sekali dengan rapat dipimpin langsung oleh Ketua Komite Audit. Rapat dapat dilaksanakan apabila dihadiri oleh minimal 51% dari total anggota komite, termasuk di antaranya seorang Komisaris Independen dan anggota independen lainnya.

Selama tahun 2024, Komite Audit telah melaksanakan rapat dengan rincian kehadiran masing-masing anggota sebagai berikut:

are carried out independently, in accordance with GCG principles. Thus, integrity and objectivity in monitoring and implementation of internal audit function are maintained in order to protect the interests of all stakeholders.

Audit Committee's Profile

Profile of the Audit Committee is presented in the Board of Commissioners' Profile and Risk Monitoring Committee's profile.

Independency of the Audit Committee

All members of the Audit Committee have acted independently without any intervention from any party as reflected in the fulfillment of independency aspect by all Audit Committee members, which is disclosed as follows:

1. Does not have financial relationship with the Board of Commissioners, Board of Directors, and Main and Controlling Shareholders;
2. Does not have share ownership relationship in the Bank, either directly or indirectly;
3. Does not have management relationship in the Bank, Subsidiary, and affiliated company;
4. Does not have family relationship with the Board of Commissioners, Board of Directors, Main and Controlling Shareholders, and/or among members of Audit Committee; and
5. Does not hold position as administrator of political party, state, and government.

Audit Committee's Meeting

Pursuant to the Financial Services Authority Regulation No. 17 of 2023, the Audit Committee is required to hold meeting at least once a month, with the meeting chaired directly by the Audit Committee's Chairman. A meeting can be held if attended by at least 51% of the total committee members, including one Independent Commissioner and other independent members.

Throughout 2024, the Audit Committee held meetings with details of each member's attendance as follows:

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

Agenda Rapat Komite Audit

Sepanjang tahun 2024, rapat Komite Audit membahas berbagai agenda penting, termasuk realisasi rencana kerja Audit/SKAI, penerapan Peraturan Otoritas Jasa Keuangan No. 17, serta struktur organisasi SKAI. Selain itu, Komite Audit juga mengadakan *closing meeting* dengan Kantor Akuntan Publik Ernst & Young untuk membahas hasil audit eksternal. Pembahasan lainnya mencakup

Audit Committee's Meeting Agenda

Throughout 2024, the Audit Committee's meetings discussed various important agenda, including realization of Audit/SKAI work plan, implementation of Financial Services Authority Regulation No. 17, and organizational structure of SKAI. Furthermore, the Audit Committee also held closing meeting with Public Accounting Firm Ernst & Young to discuss external audit results. Other discussions

sosialisasi *recovery plan* sebagai langkah antisipasi terhadap potensi risiko serta pemeriksaan khusus terhadap Kantor Cabang BSD untuk memastikan kepatuhan operasional sesuai dengan regulasi yang berlaku.

Laporan Singkat Pelaksanaan Kegiatan Komite Audit Tahun 2024

Sepanjang tahun 2024, Komite Audit telah melaksanakan kegiatan sebagai bentuk pelaksanaan tugas dan tanggung jawabnya yang diuraikan sebagai berikut:

1. Melakukan pengkajian terhadap Laporan Keuangan Tahunan 2024;
2. Membahas laporan keuangan dengan manajemen;
3. Melakukan komunikasi dengan akuntan publik terkait audit Laporan Keuangan Tahunan 2024;
4. Menyelenggarakan rapat internal serta rapat dengan akuntan publik sebanyak 13 (tiga belas) kali;
5. Mengevaluasi realisasi penggunaan jasa audit oleh kantor akuntan publik/akuntan publik;
6. Menyeleksi, menunjuk, dan mengawasi pekerjaan Auditor Independen untuk jasa audit informasi keuangan tahunan;
7. Mengevaluasi efektivitas pelaksanaan fungsi internal audit (SKAI);
8. Menelaah efektivitas dan efisiensi pengendalian internal triwulanan;
9. Menelaah kepatuhan terhadap peraturan perundang-undangan;
10. Menelaah Laporan Pokok-Pokok Audit Internal (LPPAI) SKAI Semesteran; dan
11. Meninjau ulang penyusunan rencana kerja tahunan SKAI.

Selain itu, Komite Audit telah melakukan penelaahan dan peninjauan melalui analisis laporan dan rapat, yang hasilnya disampaikan kepada Dewan Komisaris melalui Memo Intern di antaranya terkait:

1. Laporan Tahunan Komite Audit Tahun 2023;
2. Laporan Hasil Pemeriksaan SKAI, Divisi Kepatuhan, dan sistem prosedur posisi Agustus 2023;
3. Laporan Hasil Pemeriksaan SKAI, Departemen AML, CTF & WMD posisi November 2023; dan
4. Berbagai laporan terkait evaluasi kinerja divisi, kepatuhan internal, pengendalian keuangan, dan audit atas informasi keuangan historis sepanjang tahun 2023-2024.

Pelatihan dan/atau Peningkatan Komite Audit

Pengembangan kompetensi yang diikuti oleh anggota Komite Audit di tahun 2024 telah disampaikan pada pelatihan dan/atau peningkatan kompetensi Dewan Komisaris dan Komite Pemantau Risiko.

include the dissemination of recovery plan as an anticipatory measure against potential risks and special audit of BSD Branch Office to ensure operational compliance in accordance with the applicable regulations.

Brief Report on Implementation of Audit Committee's Activities in 2024

Throughout 2024, the Audit Committee carried out activities as the implementation of its duties and responsibilities as described below:

1. Reviewing the 2024 Annual Financial Statements;
2. Discussing financial statements with the management;
3. Communicating with public accountant regarding audit of the 2024 Annual Financial Statements;
4. Holding 13 (thirteen) internal meetings and meetings with public accountant;
5. Evaluating the realization of audit services by public accounting firm/public accountant;
6. Selecting, appointing, and supervising the Independent Auditor's work for the service of annual financial information audit;
7. Evaluating the effectiveness of implementation of the internal audit function (SKAI);
8. Reviewing the effectiveness and efficiency of quarterly internal control;
9. Reviewing the compliance with laws and regulations;
10. Reviewing the SKAI & Internal Audit Principles Report (LPPAI) semi-annually; and
11. Reviewing the preparation of annual work plan of SKAI.

Furthermore, the Audit Committee also conducted assessment and review through report analysis and meetings, the results of which were submitted to the Board of Commissioners through Internal Memo including:

1. The Audit Committee's Annual Report in 2023;
2. Report on Audit Results of SKAI, Compliance Division, and system procedures for August 2023;
3. Report on Audit Results of SKAI, AML, CTF & WMD Departments for November 2023; and
4. Various reports related to division performance evaluation, internal compliance, financial control, and audit of historical financial information throughout 2023-2024.

Audit Committee's Training and/or Development Programs

The competency development attended by Audit Committee members in 2024 was presented in the training and/or competency development of the Board of Commissioners and Risk Monitoring Committee.

Organ Pendukung Dewan Komisaris
Board of Commissioners' Supporting Organ

Sekretaris Dewan Komisaris

Sekretaris Dewan Komisaris diangkat oleh Bank dengan tanggung jawab utama untuk mendukung administrasi Dewan Komisaris serta mengoordinasikan kegiatan identifikasi, perencanaan, dan pelaksanaan strategi pengelolaan kesekretariatan dan protokoler Dewan Komisaris. Dalam menjalankan tugasnya, Sekretaris Dewan Komisaris bertanggung jawab langsung kepada Dewan Komisaris, dengan tujuan menciptakan fungsi kesekretariatan yang efektif dan efisien. Hal ini diharapkan dapat mendukung kelancaran operasional Dewan Komisaris dalam menjalankan perannya secara optimal.

Tugas dan Tanggung Jawab Sekretaris Dewan Komisaris

Sekretaris Dewan Komisaris memiliki tugas dan tanggung jawab sebagai berikut:

1. Membantu Dewan Komisaris dalam menjaga agar pelaksanaan BOC *Charter* secara teknis dapat dilakukan dengan tertib;
2. Mengatur terselenggaranya rapat Dewan Komisaris;
3. Menyiapkan risalah rapat untuk disahkan dalam rapat berikutnya;
4. Menyiapkan laporan tentang pelaksanaan keputusan rapat guna dikaji dalam rapat berikutnya; dan
5. Menjaga kerahasiaan seluruh dokumen yang menurut sifatnya harus dirahasiakan.

Secretary of the Board of Commissioners

Secretary of the Board of Commissioners is appointed by the Bank with its main responsibility to support the Board of Commissioners' administration and coordinate the identification, planning, and implementation activities of secretariat management strategy and Board of Commissioners' protocols. In performing its duties, the Secretary of the Board of Commissioners is directly responsible to the Board of Commissioners, with the aim of creating an effective and efficient secretariat function. This is expected to support the smooth operation of Board of Commissioners in optimally performing its role.

Duties and Responsibilities of Board of Commissioners' Secretary

The Secretary of the Board of Commissioners has duties and responsibilities as follows:

1. To help the Board of Commissioners in maintaining the implementation of BOC Charter technically, so that it can be conducted in an orderly manner;
2. To manage the implementation of Board of Commissioners' meetings;
3. To prepare minutes of meeting to be validated in the next meeting;
4. To prepare report on the implementation of meeting decisions in order to be reviewed in the next meeting; and
5. To maintain the confidentiality of all confidential documents.

Komite di Bawah Direksi
Board of Directors' Subordinate Committees

Komite Manajemen Risiko

Komite Manajemen Risiko adalah komite eksekutif yang dibentuk oleh Direksi sebagai wadah pengambilan keputusan dan memastikan efektivitas pelaksanaan dan pengelolaan risiko. Komite ini bertanggung jawab dalam perumusan kebijakan, strategi, dan sasaran di bidang manajemen risiko, sebagaimana diatur dalam Surat Keputusan Direksi No. 019A/SK-DIR/10/23 tanggal 19 Oktober 2023 tentang Pedoman dan Tata Tertib *Risk Management Committee*.

Risk Management Committee

The Risk Management Committee is an executive committee established by the Board of Directors as a forum for decision-making and ensuring the effectiveness of risk implementation and management. This committee is responsible for formulating policies, strategies, and targets in risk management, as stipulated in the Board of Directors' Decision Letter No. 019A/SK-DIR/10/23 dated 19 October 2023 on Guidelines and Procedures of the Risk Management Committee.

Pedoman Komite Manajemen Risiko

Dalam melaksanakan tugas dan tanggung jawabnya, Komite Manajemen Risiko mengacu pada Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2016 tanggal 22 Maret 2016 tentang Penerapan Manajemen Risiko bagi Bank Umum, Surat Edaran Otoritas Jasa Keuangan No. 34/SEOJK.03/2016 tanggal 1 September 2016 tentang Penerapan Manajemen Risiko bagi Bank Umum, Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Tata Kelola bagi Bank Umum, dan Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tentang Penerapan Tata Kelola bagi Bank Umum.

Pernyataan Independensi Komite Manajemen Risiko

Seluruh anggota Komite Manajemen Risiko senantiasa mengedepankan prinsip independensi dalam setiap pelaksanaan tugas dan tanggung jawabnya demi menjamin tidak terjadinya hal-hal yang berpotensi menimbulkan benturan kepentingan dan kerugian bagi Bank.

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

Wewenang, tanggung jawab, dan tugas serta realisasi pelaksanaan tugas dari Komite Manajemen Risiko di tahun 2024 diuraikan sebagai berikut:

1. Wewenang dan tanggung jawab:
   a. Menyusun dan menyetujui kebijakan, strategi, dan pedoman penerapan manajemen risiko Bank, termasuk strategi kerangka kerja, metodologi, sistem, dan tools pengelolaan risiko termasuk rencana-rencana kontingensi dan memastikan penerapannya yang meliputi semua jenis risiko;
   b. Melakukan penyempurnaan proses manajemen risiko secara berkala maupun bersifat insidental sebagai akibat dari suatu perubahan kondisi eksternal dan internal yang memengaruhi kecukupan permodalan, profil risiko, dan tidak efektifnya penerapan manajemen risiko berdasarkan hasil evaluasi;
   c. Menetapkan hal-hal terkait dengan keputusan bisnis yang menyimpang dari prosedur normal seperti pelampauan ekspansi usaha yang signifikan dibandingkan dengan rencana bisnis yang telah ditetapkan sebelumnya atau pengambilan posisi/eksposur risiko yang melampaui limit yang telah ditetapkan; dan
   d. Menyusun dan menyetujui *recovery plan* yang merupakan pedoman bagi Bank dalam mengelola risiko dan modal dalam kondisi krisis agar dapat ditanggulangi secara cepat dan tepat.
2. Tugas dan realisasi:
   a. Melakukan pengembangan atas penerapan budaya risiko untuk setiap jenjang organisasi;
   b. Mengevaluasi dan menyesuaikan Kebijakan dan Pedoman Umum Penerapan Manajemen Risiko dengan kebijakan otoritas yang disesuaikan dengan ukuran dan kompleksitas usaha Bank serta risiko yang melekat pada Bank;
   c. Mengevaluasi arah, strategi, dan program manajemen risiko;

Risk Management Committee Charter

In performing its duties and responsibilities, the Risk Management Committee refers to Financial Services Authority Regulation No. 18/POJK.03/2016 dated 22 March 2016 on Risk Management Implementation for Commercial Banks, Financial Services Authority Circular No. 34/SEOJK.03/2016 dated 1 September 2016 on Risk Management Implementation for Commercial Banks, Financial Services Authority Regulation No. 17 of 2023 on Governance for Commercial Banks, and Financial Services Authority Circular No. 13/SEOJK.03/2017 on Governance Implementation for Commercial Banks.

Statement of Independence of Risk Management Committee

All members of Risk Management Committee always prioritize independence principle in every implementation of their duties and responsibilities to ensure that there are no potential conflicts of interest nor losses for the Bank.

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

The authorities, responsibilities, duties, and the realization of Risk Management Committee's duties in 2024 are described as follows:

1. Authorities and responsibilities:
   a. Preparing and approving policies, strategies, and guidelines for implementing the Bank's risk management, including strategy framework, methodology, system, and risk management tools including contingency plans and ensuring their implementation covering all types of risks;
   b. Improving the risk management process, both periodically or incidental as result of changes in the external and internal conditions affecting the capital adequacy, risk profile, and ineffective implementation of risk management based on evaluation results;
   c. Determining matters related to business decisions that deviate from normal procedures, such as significant excess of business expansion compared to the established business plan or taking a position/risk exposure that exceeds the established limits; and
   d. Preparing and approving recovery plan that is the guideline for the Bank in managing risk and capital in crisis condition so that it can be handled quickly and appropriately.
2. Duties and realizations:
   a. Developing the implementation of risk culture for each organizational level;
   b. Evaluating and adjusting the Risk Management Policy and General Guidelines with authority policies to regulatory policies, which are adjusted to the Bank's business size and complexity and the risks inherent in the Bank;
   c. Evaluating risk management direction, strategy, and program;

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

Struktur dan Keanggotaan Komite Manajemen Risiko

Komite Manajemen Risiko terdiri dari mayoritas anggota Direksi yang berperan sebagai anggota tetap, serta anggota tidak tetap yang berasal dari Pejabat Eksekutif Bank. Penunjukan anggota Direksi dan Pejabat Eksekutif dalam komite dilakukan oleh Direktur Utama, dengan mempertimbangkan eksposur risiko Bank. Susunan keanggotaan Komite Manajemen Risiko telah ditetapkan melalui Keputusan Direksi No. 020/SK-DIR/01/24 tanggal 24 Januari 2024 tentang Perubahan Penunjukan Susunan Anggota Komite Manajemen Risiko PT Bank Victoria Internasional Tbk, sebagai berikut:

1. Ketua diisi oleh Direktur Utama;
2. Wakil Ketua diisi oleh Direktur Kepatuhan dan Manajemen Risiko;
3. Sekretaris diisi oleh Kepala Divisi Manajemen Risiko;
4. Anggota diisi oleh Direksi dan *Senior Executive Vice President;*
5. Undangan Tetap Anggota diisi oleh Kepala Divisi SKAI, Kepala Divisi IT, Kepala Divisi *Treasury*, Kepala Divisi *Operation & Internal Control*, Kepala Divisi *Finance and Accounting*, Kepala Divisi CMO, dan Kepala Divisi *Compliance, System Procedure & Customer Protection*; dan
6. Undangan Tidak Tetap diisi oleh pihak internal dan eksternal yang diundang.

Rapat Komite Manajemen Risiko

Sesuai dengan Surat Keputusan Direksi No. 019A/SK-DIR/10/23 tanggal 19 Oktober 2023 tentang Pedoman dan Tata Tertib *Risk Management Committee*, Komite Manajemen Risiko diwajibkan untuk melaksanakan rapat minimal 3 (tiga) bulan sekali. Rapat dapat dilaksanakan apabila dihadiri oleh minimal 51% dari anggota tetap. Komite Manajemen Risiko telah melaksanakan rapat sebanyak 4 (empat) kali di tahun 2024 dengan tingkat kehadiran 64,00%.

Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan

Komite Manajemen Risiko Terintegrasi adalah komite eksekutif yang bertanggung jawab untuk memastikan penerapan manajemen risiko sesuai dengan karakteristik dan kompleksitas operasional Grup Keuangan Victoria. Komite Manajemen Risiko Terintegrasi berperan

d. Monitoring the implementation of Risk Management Policy and General Guidelines;
e. Monitoring the risk position comprehensively, conducting stress testing and back testing;
f. Reviewing the risk management process periodically;
g. Reviewing any proposed new activities/products;
h. Conducting risk management disclosure that includes performance and policy direction of risk management;
i. Evaluating recovery plans periodically; and
j. Approving corrective measures to address risk issues that are of concern to regulators.

Structure and Composition of Risk Management Committee

The Risk Management Committee consists of a majority of Board of Directors' members who act as permanent members, as well as non-permanent members who come from the Bank's Executive Officers. The appointment of members of Board of Directors and Executive Officers in the committee is carried out by the President Director, with due observance of the Bank's risk exposure. The composition of Risk Management Committee has been determined through the Board of Directors' Decision Letter No. 020/SK-DIR/01/24 dated 24 January 2024 on Changes in the Appointment of Members of Risk Management Committee of PT Bank Victoria Internasional Tbk, as follows:

1. Chairman held by the President Director;
2. Vice Chairman held by the Director of Compliance and Risk Management;
3. Secretary held by the Head of Risk Management Division;
4. Members held by the Board of Directors and Senior Executive Vice President;
5. Permanent Invitation for Members filled in by Head of SKAI Division, Head of IT Division, Head of Treasury Division, Head of Operation & Internal Control Division, Head of Finance and Accounting Division, Head of CMO Division, and Head of Compliance, System Procedure & Customer Protection Division; and
6. Non-Permanent Invitation filled in by invited internal and external parties.

Risk Management Committee's Meeting

Pursuant to the Board of Directors' Decision Letter No. 019A/SK-DIR/10/23 dated 19 October 2023 on Guidelines and Procedures of Risk Management Committee, the Risk Management Committee is required to hold meeting at least once every 3 (three) months. A meeting can be held if attended by at least 51% of the permanent members. The Risk Management Committee held 4 (four) meetings in 2024 with an attendance rate of 64.00%.

Integrated Risk Management Committee in the Financial Group

The Integrated Risk Management Committee is the executive committee responsible for ensuring the risk management implementation is in accordance with the characteristics and complexity of Victoria Financial Group. The Integrated Risk

dalam mengoordinasikan pengelolaan risiko secara menyeluruh, sehingga dapat mendukung stabilitas dan keberlanjutan operasional Grup.

Pedoman Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan

Berdasarkan Surat Otoritas Jasa Keuangan No. S-66/PB.33/2021 tanggal 23 Juni 2021 tentang Perubahan Status Konglomerasi Keuangan Grup Victoria menjadi Grup Keuangan Victoria, di mana Bank ditunjuk sebagai Entitas Koordinator. Pelaksanaan tugas dan tanggung jawab Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan tidak bertentangan dengan ketentuan Peraturan Otoritas Jasa Keuangan sepanjang dinyatakan tetap berlakunya Peraturan Otoritas Jasa Keuangan No. 17/POJK.03/2014 tanggal 18 November 2014 tentang Penerapan Manajemen Risiko Terintegrasi bagi Konglomerasi Keuangan, Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2014 tanggal 18 November 2014 tentang Penerapan Tata Kelola Terintegrasi bagi Konglomerasi Keuangan, dan Peraturan Otoritas Jasa Keuangan No. 26/POJK.03/2015 tanggal 11 Desember 2015 tentang Kewajiban Penyediaan Modal Minimum Terintegrasi bagi Konglomerasi Keuangan.

Pernyataan Independensi Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan

Seluruh anggota Komite Manajemen Risiko Terintegrasi senantiasa mengedepankan prinsip independensi dalam setiap pelaksanaan tugas dan tanggung jawabnya demi menjamin tidak terjadinya hal-hal yang berpotensi menimbulkan benturan kepentingan dan kerugian bagi Bank.

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan

Tugas dan tanggung jawab serta realisasi pelaksanaan tugas dari Komite Manajemen Risiko Terintegrasi di tahun 2024 diuraikan sebagai berikut:

1. Mengembangkan penerapan budaya risiko secara terintegrasi sebagai bagian dari penerapan manajemen risiko terintegrasi Grup Keuangan Victoria;
2. Melaksanakan kebijakan manajemen risiko secara terintegrasi dalam Grup Keuangan Victoria yang telah ditetapkan;
3. Memberikan rekomendasi serta perbaikan atau penyempurnaan dalam hal penyusunan kebijakan manajemen risiko secara terintegrasi dalam Grup Keuangan Victoria;
4. Mengarahkan, menyetujui, memantau, mengevaluasi, dan menyesuaikan kebijakan dan/atau pedoman umum penerapan manajemen risiko terintegrasi dalam Grup Keuangan Victoria sesuai dengan ukuran dan kompleksitas usaha anggota Grup Keuangan Victoria; dan
5. Mengevaluasi arah, strategi, dan program manajemen risiko terintegrasi dalam Grup Keuangan Victoria.

Management Committee plays a role in coordinating the overall risk management, thus it can support the stability and sustainability of the Group's operations.

Guidelines of Integrated Risk Management Committee in the Financial Group

Based on the Financial Services Authority Circular No. S-66/PB.33/2021 dated 23 June 2021 on Changes in Status of Victoria Group Financial Conglomeration to Victoria Financial Group, the Bank is appointed as the Coordinating Entity. The implementation of duties and responsibilities of the Integrated Risk Management Committee in Financial Group does not conflict with the provisions of Financial Services Authority Regulation as long as it states the enforcement of Financial Services Authority Regulation No. 17/POJK.03/2014 dated 18 November 2014 on Implementation of Integrated Risk Management for Financial Conglomeration, Financial Services Authority Regulation No. 18/POJK.03/2014 dated 18 November 2014 on Implementation of Integrated Governance for Financial Conglomeration, and Financial Services Authority Regulation No. 26/POJK.03/2015 dated 11 December 2015 on the Integrated Capital Adequacy Ratio for Financial Conglomeration.

Statement of Independence of Integrated Risk Management Committee in the Financial Group

All members of the Integrated Risk Management Committee always prioritize independence principle in every implementation of their duties and responsibilities to ensure that there are no potential conflicts of interest nor losses for the Bank.

Duties, Responsibilities, and Realization of Duties of Integrated Risk Management Committee in the Financial Group

Duties and responsibilities as well as realization of Integrated Risk Management Committee's duties in 2024 were described as follows:

1. Developing risk culture in an integrated manner as part of integrated risk management implementation in Victoria Financial Group;
2. Implementing risk management policies in an integrated manner within the established Victoria Financial Group;
3. Providing recommendations for improvements or refinements in formulating integrated risk management policies within Victoria Financial Group;
4. Directing, approving, monitoring, evaluating, and adjusting the policies and/or general guidelines on integrated risk management implementation in Victoria Financial Group in accordance with the business size and complexity of Victoria Financial Group members; and
5. Evaluating the directions, strategies, and integrated risk management program of Victoria Financial Group.

Struktur dan Keanggotaan Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan

Susunan keanggotaan Komite Manajemen Risiko Terintegrasi sesuai Surat Keputusan Direksi No. 001/SK-DIR/08/21 tanggal 20 Agustus 2021, sebagai berikut:

1. Ketua (Anggota) diisi oleh Direktur Kepatuhan dan Manajemen Risiko Entitas Koordinator;
2. Sekretaris (Anggota) diisi oleh Kepala Divisi *Risk Management/ Integrated* Entitas Koordinator; dan
3. Anggota diisi oleh Bank Victoria Syariah (Direktur yang membawahi fungsi manajemen risiko, dan Unit Manajemen Risiko), Victoria Sekuritas Indonesia (Direktur yang membawahi fungsi manajemen risiko, dan Kepala Unit Manajemen Risiko), Victoria Insurance (Direktur yang membawahi fungsi manajemen risiko, dan Pejabat Eksekutif yang memimpin Satuan Kerja Manajemen Risiko), Victoria Manajemen Investasi (Direktur yang membawahi fungsi manajemen risiko, dan Kepala Unit Manajemen Risiko), dan Victoria Alife Indonesia (Direktur yang membawahi fungsi manajemen risiko, dan Pejabat Eksekutif yang memimpin Satuan Kerja Manajemen Risiko).

Rapat Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan

Sesuai dengan Surat Keputusan Direksi No. 002/SK-DIR/08/21 tentang Pedoman dan Tata Tertib Kerja Komite Manajemen Risiko Grup Keuangan Victoria, Komite Manajemen Risiko Terintegrasi diwajibkan untuk melaksanakan rapat minimal 1 (satu) kali setiap semester dalam setahun maupun insidental. Rapat dapat dilaksanakan apabila dihadiri oleh minimal 51% dari anggota tetap. Komite Manajemen Risiko Terintegrasi telah melaksanakan rapat sebanyak 2 (dua) kali di tahun 2024 dengan tingkat kehadiran 100,00%.

Structure and Composition of Integrated Risk Management Committee in the Financial Group

The composition of the Integrated Risk Management Committee according to the Board of Directors' Decision Letter No. 001/SK-DIR/08/21 dated 20 August 2021, is as follows:

1. Chairman (Member) held by Director of Compliance and Risk Management of Coordinator Entity;
2. Secretary (Member) held by Head of Risk Management/ Integrated Division of Coordinator Entity; and
3. Members held by Bank Victoria Syariah (Director in charge of risk management function, and Risk Management Unit), Victoria Sekuritas Indonesia (Director in charge of risk management function, and Head of Risk Management Unit), Victoria Insurance (Director in charge of risk management function, and Executive Officer in charge of Head of Risk Management Work Unit), Victoria Manajemen Investasi (Director in charge of risk management function, and Head of Risk Management Unit), Victoria Alife Indonesia (Director in charge of risk management function, and Executive Officer in charge of Risk Management Work Unit).

Integrated Risk Management Committee's Meeting in Financial Group

Pursuant to the Board of Directors' Decision Letter No. 002/SK-DIR/08/21 on Charter and Work Guidelines of Risk Management Committee of Victoria Financial Group, the Integrated Risk Management Committee is required to hold at least 1 (one) meeting every semester in a year or incidentally. A meeting can be held if attended by at least 51% of the permanent members. The Integrated Risk Management Committee held 2 (two) meetings in 2024 with an attendance rate of 100.00%.

Assets and Liability Committee

Assets and Liabilities Committee (ALCO) adalah komite eksekutif yang mendukung Direksi dalam mengoptimalkan pengelolaan aset dan liabilitas dengan tujuan memaksimalkan profit sambil meminimalkan risiko dan memastikan likuiditas Bank terjaga.

Pedoman ALCO

Dalam melaksanakan tugas dan tanggung jawabnya, ALCO mengacu pada Surat Keputusan Direksi No. 004/SK-DIR/09/19 tentang Pedoman dan Tata Tertib Kerja *Assets & Liabilities Committee* (ALCO).

Pernyataan Independensi ALCO

Seluruh anggota ALCO senantiasa mengedepankan prinsip independensi dalam setiap pelaksanaan tugas dan tanggung jawabnya demi menjamin tidak terjadinya hal-hal yang berpotensi menimbulkan benturan kepentingan dan kerugian bagi Bank.

Assets and Liability Committee

Assets and Liabilities Committee (ALCO) is an executive committee that supports the Board of Directors in optimizing asset and liability management, with the aim of maximizing profit while minimizing risk and maintaining the Bank's liquidity.

ALCO Charter

In performing its duties and responsibilities, ALCO refers to the Board of Directors' Decision Letter No. 004/SK-DIR/09/19 on Charter and Work Guidelines of Assets & Liabilities Committee (ALCO).

Statement of Independency of ALCO

All members of ALCO always prioritize independence principle in every implementation of their duties and responsibilities to ensure that there are no potential conflicts of interest nor losses for the Bank.

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas ALCO

Tugas dan tanggung jawab serta realisasi pelaksanaan tugas dari ALCO di tahun 2024 diuraikan sebagai berikut:

1. Memantau dan memperhatikan struktur neraca dan memaksimumkan profitabilitas;
2. Merencanakan, menetapkan, dan mengendalikan sumber dan penggunaan dana Bank;
3. Menetapkan tingkat suku bunga kredit maupun pendanaan;
4. Melakukan evaluasi anggaran dan realisasi Laporan Keuangan Bank dengan memperhatikan indikator-indikator/risiko Bank;
5. Merumuskan, menetapkan, dan mengevaluasi kebijakan, strategi, dan sasaran dalam beberapa bidang, yaitu Manajemen Strategi, Manajemen Likuiditas, Manajemen *Gap*, serta Manajemen Investasi dan Pendapatan (*Pricing*) dalam lingkup ALMA; dan
6. Memantau dan memperhatikan perkembangan kondisi ekonomi mikro maupun makro, seperti inflasi, nilai tukar, dan perkembangan suku bunga yang dapat memengaruhi kinerja Bank.

Struktur dan Keanggotaan ALCO

Susunan keanggotaan ALCO sesuai Surat Keputusan Direksi No. 009/SK-DIR/03/2019 tentang Susunan Keanggotaan *Assets and Liabilities Committee* (ALCO) PT Bank Victoria International Tbk, sebagai berikut:

1. Ketua diisi oleh Direktur Utama;
2. Sekretaris diisi oleh Kepala Divisi *Treasury;*
3. Anggota Tetap diisi oleh seluruh Direksi, seluruh *Senior Executive Vice President*, seluruh Kepala Divisi pada Direktorat Bisnis, Kepala Divisi *Risk Management/Integrated,* dan Kepala Divisi *Finance and Accounting;* dan
4. Anggota Tidak Tetap diisi oleh Divisi atau Unit Kerja Lain dan seluruh Kepala Area.

Rapat ALCO

Sesuai dengan Pedoman ALCO, ALCO diwajibkan untuk melaksanakan rapat minimal sebulan sekali ataupun insidental. Rapat dapat dilaksanakan apabila dihadiri oleh minimal 50% dari Direksi, kecuali Direktur Kepatuhan dan Manajemen Risiko. ALCO telah melaksanakan rapat sebanyak 15 (lima belas) kali di tahun 2024 dengan tingkat kehadiran 90,00%.

Duties, Responsibilities, and the Realization of ALCO Duties

Duties and responsibilities as well as realization of ALCO's duties in 2024 were described as follows:

1. Monitoring and overseeing the balance sheet structure and maximizing profitability;
2. Planning, establishing, and controlling the source and use of Bank funds;
3. Establishing interest rates on credit and funding;
4. Evaluating the budget and realization of the Bank's financial statements with due regard to the Bank's indicators/risks;
5. Formulating, establishing, and evaluating policies, strategies, and objectives in several areas, which are Strategic Management, Liquidity Management, Gap Management, and Investment and Pricing Management within the scope of ALMA; and
6. Monitoring and observing the development of micro and macroeconomic conditions, such as inflation, exchange rates, and interest rate development that may affect the Bank's performance.

Structure and Composition of ALCO

The composition of ALCO according to the Board of Directors' Decision Letter No. 009/SK-DIR/03/2019 on the Composition of Assets and Liabilities Committee (ALCO) of PT Bank Victoria International Tbk, is as follows:

1. Chairman held by President Director;
2. Secretary held by Head of Treasury Division;
3. Permanent Members held by all Members of Board of Directors, all Senior Executive Vice President, all Division Head in the Business Directorate, Head of Risk Management/Integrated Division, and Head of Finance and Accounting Division; and
4. Non-Permanent Members held by Other Divisions or Work Units and all Area Heads.

ALCO's Meeting

In accordance with ALCO Charter, ALCO is required to hold meeting at least once a month or incidentally. Meetings can be held if attended by at least 50% of the Board of Directors, except for the Director of Compliance and Risk Management. ALCO held 15 (fifteen) meetings in 2024 with an attendance rate of 90.00%.

Komite Kredit

Komite Kredit dibentuk untuk mendukung proses pemberian kredit serta memastikan penetapan jumlah *credit exposure* Bank sesuai dengan batas limit yang telah ditetapkan. Komite Kredit bertanggung jawab dalam meninjau, mengevaluasi, dan mengesahkan keputusan kredit guna menjaga kualitas portofolio kredit Bank.

Pedoman Komite Kredit

Dalam melaksanakan tugas dan tanggung jawabnya, Komite Kredit mengacu pada Surat Keputusan Direksi No. 014/SK-DIR/01/24 tanggal 18 Januari 2024 tentang Pedoman dan Tata Tertib Kerja Komite Kredit.

Credit Committee

Credit Committee is established to support the credit provision process and to ensure that the Bank's credit exposure amount is determined in accordance with the specified limit. The Credit Committee is responsible for reviewing, evaluating, and approving credit decision in order to maintain the quality of the Bank's credit portfolio.

Credit Committee Charter

In performing its duties and responsibilities, the Credit Committee refers to the Board of Directors' Decision Letter No. 014/SK-DIR/01/24 dated 18 January 2024 on the Guidelines and Procedures of Credit Committee.

Pernyataan Independensi Komite Kredit

Seluruh anggota Komite Kredit senantiasa mengedepankan prinsip independensi dalam setiap pelaksanaan tugas dan tanggung jawabnya demi menjamin tidak terjadinya hal-hal yang berpotensi menimbulkan benturan kepentingan dan kerugian bagi Bank.

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas Komite Kredit

Tugas dan tanggung jawab serta realisasi pelaksanaan tugas dari Komite Kredit di tahun 2024 adalah memberikan persetujuan/ penolakan terhadap usulan fasilitas penyediaan dana dari masing-masing divisi/unit pengusul.

Struktur dan Keanggotaan Komite Kredit

Susunan keanggotaan Komite Kredit sesuai Surat Keputusan Direksi No. 014/SK-DIR/01/24 tanggal 18 Januari 2024, sebagai berikut:

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

Rapat Komite Kredit

Sesuai dengan Pedoman Komite Kredit, Komite Kredit diwajibkan untuk melaksanakan rapat minimal seminggu sekali ataupun insidental. Keputusan anggota Komite Kredit harus kuorum dan bulat/*unanimous*. Jika terjadi perbedaan keputusan antar anggota Komite Kredit pemutus, maka kredit dianggap tidak disetujui. Komite Kredit telah melaksanakan rapat sebanyak 89 kali di tahun 2024 dengan tingkat kehadiran 100,00%.

Komite Kebijakan Perkreditan

Komite Kebijakan Perkreditan dibentuk oleh Direksi untuk membantu merumuskan kebijakan kredit yang hati-hati, memantau pelaksanaannya, serta mengevaluasi konsistensi dan tanggung jawab dalam penerapannya. Komite Kebijakan Perkreditan juga memonitor kondisi portofolio kredit dan memberikan saran perbaikan untuk ke depannya.

Statement of Independence of Credit Committee

All members of Credit Committee always prioritize independence principle in every implementation of their duties and responsibilities to ensure that there are no potential conflicts of interest nor losses for the Bank.

Duties, Responsibilities, and the Realization of Credit Committee Duties

Duties and responsibilities as well as realization of Credit Committee's duties in 2024 were to approve/reject proposed funding facilities from each proposing division/unit.

Structure and Composition of Credit Committee

The composition of the Credit Committee according to the Board of Directors' Decision Letter No. 014/SK-DIR/01/24 dated 18 January 2024, is as follows:

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

Credit Committee Meeting

In accordance with Credit Committee Charter, the Credit Committee is required to hold meeting at least once a week or incidentally. Decision made by the Credit Committee member must be quorum and unanimous. In the event of any dispute between the members of the deciding Credit Committee, then the credit will be deemed unapproved. The Credit Committee held 89 meetings in 2024 with an attendance rate of 100.00%.

Credit Policy Committee

The Credit Policy Committee is established by the Board of Directors to help formulate prudent credit policies, monitor their implementation, and evaluate consistency and responsibility in their implementation. The Credit Policy Committee also monitors credit portfolio condition and provides suggestions for future improvements.

Pedoman Komite Kebijakan Perkreditan

Dalam melaksanakan tugas dan tanggung jawabnya, Komite Kebijakan Perkreditan mengacu pada Peraturan Otoritas Jasa Keuangan No. 42/POJK.03/2017 tentang Kewajiban Penyusunan dan Pelaksanaan Kebijakan Perkreditan atau Pembiayaan bagi Bank Umum, Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Tata Kelola bagi Bank Umum, dan Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tentang Penerapan Tata Kelola bagi Bank Umum.

Pernyataan Independensi Komite Kebijakan Perkreditan

Seluruh anggota Komite Kebijakan Perkreditan senantiasa mengedepankan prinsip independensi dalam setiap pelaksanaan tugas dan tanggung jawabnya demi menjamin tidak terjadinya hal-hal yang berpotensi menimbulkan benturan kepentingan dan kerugian bagi Bank.

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

Wewenang, tanggung jawab, dan tugas serta realisasi pelaksanaan tugas dari Komite Kebijakan Perkreditan di tahun 2024 diuraikan sebagai berikut:

1. Wewenang dan tanggung jawab:
   a. Memastikan kebijakan perkreditan Bank dan seluruh peraturan pelaksanaannya sesuai dengan peraturan perundang-undangan dan regulasi yang berlaku;
   b. Memberikan usulan dan rekomendasi terkait aspek perkreditan, termasuk target *market, negative list*, sektor usaha yang harus dihindari, serta maksimum portofolio kredit per sektor usaha;
   c. Memberikan masukan kepada Direksi dalam penyusunan kebijakan perkreditan Bank; dan
   d. Melakukan evaluasi berkala terhadap kualitas kredit Bank serta memberikan saran perbaikan dan penyempurnaan proses kredit, baik secara rutin maupun insidental akibat perubahan kondisi eksternal dan internal.
2. Tugas dan realisasi:
   a. Mengawasi penerapan memastikan kebijakan perkreditan Bank dan standar operasional prosedur perkreditan agar dijalankan secara konsisten oleh organisasi perkreditan Bank;
   b. Melakukan kajian terhadap kebijakan perkreditan Bank dan standar operasional prosedur perkreditan jika ditemukan hambatan dalam implementasi berdasarkan hasil pemantauan dan pengawasan Komite Kebijakan Perkreditan;
   c. Memberikan usulan dan/atau saran perbaikan terhadap kebijakan perkreditan Bank dan standar operasional prosedur perkreditan jika diperlukan perubahan atau penyempurnaan;
   d. Memantau dan mengevaluasi berbagai aspek perkreditan, termasuk perkembangan dan kualitas portofolio kredit Bank, kebenaran kewenangan dalam memutus kredit bank, strategi pengelolaan kredit, kepatuhan terhadap

Credit Policy Committee Charter

In performing its duties and responsibilities, the Credit Policy Committee refers to Financial Services Authority Regulation No. 42/POJK.03/2017 on Obligation for Compilation and Implementation of Bank Credit or Financing Policies for Commercial Banks, Financial Services Authority Regulation No. 17 of 2023 on Governance for Commercial Banks, and Financial Services Authority Circular No. 13/SEOJK.03/2017 on Governance Implementation for Commercial Banks.

Statement of Independence of Credit Policy Committee

All members of Credit Policy Committee always prioritize independence principle in every implementation of their duties and responsibilities to ensure that there are no potential conflicts of interest nor losses for the Bank.

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

The authorities, responsibilities, duties, and the realization of Credit Policy Committee's duties in 2024 are described as follows:

1. Authorities and responsibilities:
   a. Ensuring that the Bank's credit policy and all implementing regulations are in accordance with applicable laws and regulations;
   b. Providing proposals and recommendations related to credit aspects, including target market, negative list, business sector to avoid, and maximum credit portfolio per business sector;
   c. Providing input to the Board of Directors in preparing the Bank's credit policy; and
   d. Periodically evaluating the Bank's credit quality and providing suggestions for improvements and refinements to the credit process, both routinely and incidentally due to changes in external and internal conditions.
2. Duties and realizations:
   a. Overseeing the implementation by ensuring that the Bank's credit policies and credit standard operating procedures are carried out consistently by the Bank's credit organization;
   b. Reviewing the Bank's credit policies and credit standard operating procedures if obstacles are found in implementation based on the monitoring and supervision results by the Credit Policy Committee;
   c. Providing proposals and/or suggestions for improvements to the Bank's credit policies and credit standard operating procedures if changes or refinements are needed;
   d. Monitoring and evaluating various aspects of credit, including the development and quality of the Bank's credit portfolio, the correctness of authority in deciding on bank credit, credit management strategies, compliance

ketentuan BMPK dan regulasi lainnya, pencapaian target market kredit serta pembiayaan sektor industri dengan mempertimbangkan tren pasar dan ekonomi, penyelesaian kredit bermasalah dan pembentukan Cadangan Kerugian Penurunan Nilai (CKPN); dan

e. Menyampaikan laporan tertulis kepada Direksi terkait perkembangan dan perbaikan kebijakan perkreditan Bank dan standar operasional prosedur perkreditan yang diusulkan oleh Komite Kebijakan Perkreditan.

Struktur dan Keanggotaan Komite Kebijakan Perkreditan

Susunan keanggotaan Komite Kebijakan Perkreditan sesuai Surat Keputusan Direksi No. 021/SK-DIR/01/24 tanggal 24 Januari 2024, sebagai berikut:

1. Ketua diisi oleh Direktur Utama;
2. Wakil Ketua I merangkap Anggota diisi oleh Wakil Direktur Utama;
3. Wakil Ketua II merangkap Anggota diisi oleh Direktur Bisnis;
4. Sekretaris merangkap Anggota diisi oleh Kepala Divisi *Risk Management/Integrated;*
5. Anggota diisi oleh Direktur Keuangan, Direktur Kepatuhan dan Manajemen Risiko, *Senior EVP* Bisnis, *Senior EVP* Operasional & *International Banking*, Kepala Divisi SME, Kepala Divisi *Commercial Banking*, Kepala Divisi *Credit Risk Review*, Kepala Divisi *Loan & Trade Operations*, Kepala Divisi *Special Asset Management*, Kepala Divisi *Credit Legal*, Kepala Divisi *International Banking*, Kepala Divisi *International Banking*, Wakil Kepala Divisi *Credit Monitoring & Collection*, dan Kepala Divisi *Compliance, System Procedure & Customer Protection*;
6. Undangan Tetap diisi oleh Kepala Divisi SKAI, Kepala Divisi *Corporate Legal*, Kepala Divisi *Treasury*, dan Kepala Divisi *Accounting*; dan
7. Undangan tidak tetap diisi oleh pihak internal dan eksternal yang diundang.

Rapat Komite Kebijakan Perkreditan

Sesuai dengan Surat Keputusan Direksi No. 016B/SK-DIR/08/23 tanggal 16 Agustus 2023, Komite Kebijakan Perkreditan diwajibkan untuk melaksanakan rapat secara berkala ataupun insidental. Rapat dapat dilaksanakan apabila dihadiri oleh minimal 50% dari Direksi dan 50% dari anggota non-Direksi. Komite Kebijakan Perkreditan telah melaksanakan rapat sebanyak 6 (enam) kali di tahun 2024 dengan tingkat kehadiran 77,00%.

Komite Pengarah Teknologi Informasi

Komite Pengarah Teknologi Informasi dibentuk untuk memastikan sistem teknologi informasi selaras dengan strategi Bank. Komite Pengarah Teknologi Informasi memberikan rekomendasi terkait pengelolaan teknologi dan manajemen sistem informasi, serta memantau kesiapan dan operasional infrastruktur teknologi untuk mendukung kinerja Bank secara optimal.

with LLL provisions and other regulations, achievement of credit market targets and financing of industrial sector by considering market and economic trends, settlement of problematic credit and the formation of Allowance for Impairment Losses (CKPN); and

e. Submitting written report to the Board of Directors regarding the development and improvement of the Bank's credit policy and credit standard operating procedures proposed by Credit Policy Committee.

Structure and Composition of Credit Policy Committee

The composition of the Credit Policy Committee according to the Board of Directors' Decision Letter No. 021/SK-DIR/01/24 dated 24 January 2024, is as follows:

1. Chairman held by President Director;
2. Vice Chairman I concurrently as Member held by Deputy President Director;
3. Vice Chairman II concurrently as Member held by Business Director;
4. Secretary concurrently as Member held by Head of Risk Management/Integrated Division;
5. Members held by the Director of Finance, Director of Compliance and Risk Management, Senior EVP Business, Senior EVP Operations & International Banking, Head of SME Division, Head of Commercial Banking Division, Head of Credit Risk Review Division, Head of Loan & Trade Operations Division, Head of Special Asset Management Division, Head of Credit Legal Division, Head of International Banking Division, Credit Monitoring & Collection Vice Division Head, and Head of Compliance, System Procedure & Customer Protection Division;
6. Permanent Invitation filled in by Head of SKAI Division, Head of Corporate Legal Division, Head of Treasury Division, and Head of Accounting Division; and
7. Non-Permanent Invitation filled in by invited internal and external parties.

Credit Policy Committee's Meeting

Pursuant to the Board of Directors' Decision Letter No. 016B/SK-DIR/08/23 dated 16 August 2023, the Credit Policy Committee is required to hold meetings on a regular basis or incidentally. Meetings can be held if attended by at least 50% of the Board of Directors and 50% of non-Board of Directors members. The Credit Policy Committee held 6 (six) meetings in 2024 with an attendance rate of 77.00%.

Information Technology Steering Committee

The Information Technology Steering Committee is established to ensure that the information technology system is aligned with the Bank's strategy. The Information Technology Steering Committee provides recomendation into technology management and information system management, and monitors the readiness and operation of technology infrastructure to optimally support the Bank's performance.

Pedoman Komite Pengarah Teknologi Informasi

Dalam melaksanakan tugas dan tanggung jawabnya, Komite Pengarah Teknologi Informasi mengacu pada Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2022 tanggal 6 Juli 2022 tentang Penyelenggaraan Teknologi Informasi oleh Bank Umum.

Pernyataan Independensi Komite Pengarah Teknologi Informasi

Seluruh anggota Komite Pengarah Teknologi Informasi senantiasa mengedepankan prinsip independensi dalam setiap pelaksanaan tugas dan tanggung jawabnya demi menjamin tidak terjadinya hal-hal yang berpotensi menimbulkan benturan kepentingan dan kerugian bagi Bank.

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

Tugas dan tanggung jawab serta realisasi pelaksanaan tugas dari Komite Pengarah Teknologi Informasi di tahun 2024 diuraikan sebagai berikut:

1. Menyusun rencana strategis teknologi informasi yang selaras dengan rencana korporasi Bank;
2. Merumuskan kebijakan, standar, dan prosedur teknologi informasi sesuai dengan Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2022 tanggal 6 Juli 2022 tentang Penyelenggaraan Teknologi Informasi oleh Bank Umum;
3. Memantau kesesuaian antara rencana pengembangan teknologi informasi dengan rencana strategis teknologi informasi;
4. Melakukan kesesuaian antara pelaksanaan pengembangan teknologi informasi dengan rencana yang telah ditetapkan;
5. Mengevaluasi efektivitas biaya teknologi informasi dalam kaitannya dengan pencapaian manfaat yang telah direncanakan;
6. Memantau kinerja teknologi informasi serta upaya peningkatan performanya;
7. Menyelesaikan permasalahan teknologi informasi yang tidak dapat diselesaikan oleh satuan kerja pengguna dan penyelenggara, dengan cara yang efektif, efisien, dan tepat waktu;
8. Menilai kecukupan dan alokasi sumber daya teknologi informasi yang dimiliki Bank;
9. Memastikan langkah-langkah mitigasi risiko atas investasi teknologi informasi, agar investasi tersebut memberikan kontribusi terhadap pencapaian tujuan bisnis Bank;
10. Memastikan kesesuaian pelaksanaan proyek teknologi informasi dengan rencana proyek yang disepakati (*project charter*) dalam *Service Level Agreement* (SLA);
11. Memastikan kesesuaian pelaksanaan proyek teknologi informasi sesuai dengan kebutuhan sistem informasi manajemen serta kebutuhan kegiatan usaha Bank;
12. Memastikan strategi dan rencana teknologi informasi telah memiliki serta didukung standar operasional prosedur yang memadai; dan
13. Memastikan penerapan standar operasional prosedur teknologi informasi secara konsisten dan benar.

Information Technology Steering Committee Charter

In performing its duties and responsibilities, the Information Technology Steering Committee refers to Financial Services Authority Regulation No. 11/POJK.03/2022 dated 6 July 2022 on Information Technology Operations by Commercial Banks.

Statement of Independence of Information Technology Steering Committee

All members of Information Technology Steering Committee always prioritize independence principle in every implementation of their duties and responsibilities to ensure that there are no potential conflicts of interest nor losses for the Bank.

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

Duties and responsibilities as well as realization of Information Technology Steering Committee's duties in 2024 were described as follows:

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

Struktur dan Keanggotaan Komite Pengarah Teknologi Informasi

Susunan keanggotaan Komite Pengarah Teknologi Informasi sesuai Surat Keputusan Direksi No. 022/SK-DIR/01/24 tanggal 24 Januari 2024, sebagai berikut:

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

Rapat Komite Pengarah Teknologi Informasi

Sesuai dengan dengan Surat Keputusan Direksi No. 022A/SK-DIR/01/24 tanggal 24 Januari 2024 tentang Pedoman dan Tata Tertib Kerja Komite Pengarah Teknologi Informasi, Komite ini menyelenggarakan rapat secara berkala minimal setiap 3 (tiga) bulan sekali atau sesuai dengan kebutuhan Bank. Rapat dapat dilaksanakan jika dihadiri oleh minimal 2 (dua) anggota Direksi dan 50% + 1 dari anggota. Sepanjang tahun 2024, Komite Pengarah Teknologi Informasi telah melaksanakan 4 (empat) kali rapat dengan tingkat kehadiran 95,00%.

Komite Pemantau dan Pelaksanaan GCG

Komite Pemantau dan Pelaksanaan GCG bertugas mendukung Direksi dalam menyusun, mengomunikasikan, dan mengawasi penerapan GCG, etika, pengendalian internal, serta strategi *Anti-Fraud*. Komite Pemantau dan Pelaksanaan GCG juga bertanggung jawab mengambil tindakan perbaikan untuk memastikan kepatuhan terhadap prinsip-prinsip tersebut.

Pedoman Komite Pemantau dan Pelaksanaan GCG

Dalam melaksanakan tugas dan tanggung jawabnya, Komite Pemantau dan Pelaksanaan GCG mengacu pada Surat Keputusan Direksi No. 017/SK-DIR/07/24 tanggal 31 Juli 2024 tentang Susunan Anggota Komite Pemantau dan Pelaksanaan *Good Corporate Governance* (GCG).

Structure and Composition of Information Technology Steering Committee

The composition of the Information Technology Steering Committee according to the Board of Directors' Decision Letter No. 022/SK-DIR/01/24 dated 24 January 2024, is as follows:

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

Information Technology Steering Committee's Meeting

Pursuant to the Board of Directors' Decision Letter No. 022A/SK-DIR/01/24 dated 24 January 2024 on Guidelines and Procedures of Information Technology Steering Committee, this Committee holds regular meetings at least once every 3 (three) months or according to the needs of the Bank. Meetings can be held if attended by at least 2 (two) members of Board of Directors and 50% + 1 of the members. Throughout 2024, the Information Technology Steering Committee held 4 (four) meetings with an attendance rate of 95.00%.

GCG Implementation and Monitoring Committee

The GCG Implementation and Monitoring Committee is in charge of supporting the Board of Directors in preparing, communicating, and supervising the implementation of GCG, ethics, internal control, and Anti-Fraud strategies. The GCG Implementation and Monitoring Committee is also responsible for taking corrective actions to ensure its compliance with these principles.

GCG Implementation and Monitoring Committee Charter

In performing its duties and responsibilities, the GCG Implementation and Monitoring Committee refers to the Board of Directors' Decision Letter No. 017/SK-DIR/07/24 dated 31 July 2024 on the Composition of Good Corporate Governance (GCG) Implementation and Monitoring Committee.

Pernyataan Independensi Komite Pemantau dan Pelaksanaan GCG

Seluruh anggota Komite Pemantau dan Pelaksanaan GCG senantiasa mengedepankan prinsip independensi dalam setiap pelaksanaan tugas dan tanggung jawabnya demi menjamin tidak terjadinya hal-hal yang berpotensi menimbulkan benturan kepentingan dan kerugian bagi Bank.

Statement of Independence of GCG Implementation and Monitoring Committee

All members of GCG Implementation and Monitoring Committee always prioritize independence principle in every implementation of their duties and responsibilities to ensure that there are no potential conflicts of interest nor losses for the Bank.

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

Tugas dan tanggung jawab serta realisasi pelaksanaan tugas dari Komite Pemantau dan Pelaksanaan GCG di tahun 2024 diuraikan sebagai berikut:

1. Memantau dan menganalisis setiap kebijakan terbaru maupun praktik terbaik terkait penerapan GCG;
2. Melakukan pemutakhiran kebijakan internal (*existing*) terhadap setiap perubahan kebijakan GCG;
3. Memantau secara berkala terhadap rencana dan realisasi/pencapaian bisnis Bank melalui rapat-rapat Komite;
4. Memantau *action plan* dan pelaksanaannya melalui rapat-rapat Komite;
5. Menentukan aspek dan PIC/petugas dalam penyusunan GCG sesuai dengan bidang yang tercermin dari aspek-aspek GCG;
6. Mengoordinasikan pembuatan laporan pelaksanaan GCG yang dilengkapi dan didukung dengan *underlying*-nya; dan
7. Menyusun pelaporan pelaksanaan GCG Bank dan melakukan penilaian sendiri sesuai ketentuan berlaku, serta melaporkannya kepada Direktur Utama dan Otoritas Jasa Keuangan.

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

Duties and responsibilities as well as realization of GCG Implementation and Monitoring Committee's duties in 2024 were described as follows:

1. Monitoring and analyzing any current policy and best practices related to GCG implementation;
2. Updating the existing internal policies against any GCG policy changes;
3. Monitoring periodically on the Bank's plans and business realizations/achievements through Committee meetings;
4. Monitoring the action plan and its implementation through Committee meetings;
5. Determining aspects and person in charge/PIC in drafting GCG in accordance with the areas reflected in GCG aspects;
6. Coordinating the preparation of GCG implementation reports supplemented and supported by its underlying matters; and
7. Preparing the reporting of the Bank's GCG implementation and conducting self-assessment in accordance with the prevailing provisions, and report it to the President Director and Financial Services Authority.

Struktur dan Keanggotaan Komite Pemantau dan Pelaksanaan GCG

Susunan keanggotaan Komite Pemantau dan Pelaksanaan GCG sesuai Surat Keputusan Direksi No. 017/SK-DIR/07/24 tanggal 31 Juli 2024, sebagai berikut:

1. Ketua diisi oleh Direktur Kepatuhan dan Manajemen Risiko;
2. Sekretaris diisi oleh Kepala Divisi *Compliance, System Procedure & Customer Protection*;
3. Anggota Tetap diisi oleh Direksi, *Senior Executive Vice President*, Kepala Divisi SKAI, Kepala Divisi *Risk Management/Integrated*, dan Kepala Divisi *Corporate Secretary*; dan
4. Undangan Tetap seluruh Kepala Divisi (berdasarkan undangan).

Structure and Composition of GCG Implementation and Monitoring Committee

The composition of the GCG Implementation and Monitoring Committee according to the Board of Directors' Decision Letter No. 017/SK-DIR/07/24 dated 31 July 2024, is as follows:

1. Chairman held by Director of Compliance and Risk Management;
2. Secretary held by Head of Compliance, System Procedure & Customer Protection Division;
3. Permanent Members held by Board of Directors, Senior Executive Vice President, Head of SKAI Division, Head of Risk Management/Integrated Division, and Head of Corporate Secretary Division; and
4. Permanent Invitation for all Division Heads (based on invitation).

Rapat Komite Pemantau dan Pelaksanaan GCG

Sesuai dengan Surat Keputusan Direksi No. 017/SK-DIR/07/24 tanggal 31 Juli 2024, Komite Pemantau dan Pelaksanaan GCG diwajibkan untuk melaksanakan rapat minimal 3 (tiga) kali dalam 1 (satu) tahun. Komite Pemantau dan Pelaksanaan GCG telah melaksanakan rapat sebanyak 3 (tiga) kali di tahun 2024 dengan tingkat kehadiran 100,00%.

GCG Implementation and Monitoring Committee's Meeting

Pursuant to the Board of Directors' Decision Letter No. 017/SK-DIR/07/24 dated 31 July 2024, the GCG Implementation and Monitoring Committee is required to hold meetings at least 3 (three) times in 1 (one) year. GCG Implementation and Monitoring Committee held 3 (three) meetings in 2024 with an attendance rate of 100.00%.

Komite Personalia

Komite Personalia merupakan komite yang bertugas mendukung Direksi dalam merumuskan dan mengawasi kebijakan terkait ketenagakerjaan. Komite Personalia memantau perkembangan sumber daya manusia, memastikan kepatuhan terhadap peraturan ketenagakerjaan perbankan, serta memberikan rekomendasi dan saran perbaikan sesuai dengan Undang-Undang Ketenagakerjaan yang berlaku di Indonesia.

Pedoman Komite Personalia

Dalam melaksanakan tugas dan tanggung jawabnya, Komite Personalia mengacu pada Undang-Undang No. 11 Tahun 2020 tentang Ketenagakerjaan.

Pernyataan Independensi Komite Personalia

Seluruh anggota Komite Personalia senantiasa mengedepankan prinsip independensi dalam setiap pelaksanaan tugas dan tanggung jawabnya demi menjamin tidak terjadinya hal-hal yang berpotensi menimbulkan benturan kepentingan dan kerugian bagi Bank.

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas Komite Personalia

Tugas dan tanggung jawab serta realisasi pelaksanaan tugas dari Komite Personalia di tahun 2024 diuraikan sebagai berikut:

1. Memberikan masukkan kepada Direksi dalam merumuskan kebijakan ketenagakerjaan;
2. Mengawasi kebijakan yang berhubungan dengan karyawan agar dilaksanakan secara konsekuen dan konsisten;
3. Melakukan kajian terhadap kebijakan ketenagakerjaan Bank dan memberikan saran kepada Direksi apabila diperlukan perubahan kebijakan ketenagakerjaan Bank;
4. Memantau dan mengevaluasi efektivitas setiap karyawan; dan
5. Memberikan masukan dan solusi untuk hambatan dan masalah yang terjadi terkait dengan ketenagakerjaan Bank.

Struktur dan Keanggotaan Komite Personalia

Susunan keanggotaan Komite Personalia sesuai Surat Keputusan Direktur No. 013/SK-DIR/12/24 tanggal 23 Desember 2024, sebagai berikut:

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

Rapat Komite Personalia

Sesuai dengan Surat Keputusan Direktur No. 013/SK-DIR/12/24 tanggal 23 Desember 2024, Komite Personalia diwajibkan untuk melaksanakan rapat minimal 3 (tiga) kali dalam setahun. Rapat dapat dilaksanakan apabila dihadiri oleh minimal 51% dari anggota tetap. Komite Personalia telah melaksanakan rapat sebanyak 9 (sembilan) kali di tahun 2024 dengan tingkat kehadiran 100,00%.

Personnel Committee

Personnel Committee is the committee that is in charge of supporting the Board of Directors in formulating and overseeing policies related to employment. The Personnel Committee monitors human capital development, ensures its compliance with banking employment regulations, and provides recommendations and suggestions for improvement in line with the applicable Manpower Law in Indonesia.

Personnel Committee Charter

In performing its duties and responsibilities, the Personnel Committee refers to Law No. 11 of 2020 on Manpower.

Statement of Independence of Personnel Committee

All members of Personnel Committee always prioritize independence principle in every implementation of their duties and responsibilities to ensure that there are no potential conflicts of interest nor losses for the Bank.

Duties, Responsibilities, and the Realization of Personnel Committee Duties

Duties and responsibilities as well as realization of Personnel Committee's duties in 2024 were described as follows:

1. Providing inputs to Board of Directors in formulating employment policies;
2. Overseeing employee-related policies to be consistently and consequently implemented;
3. Reviewing Bank's manpower policies and advising the Board of Directors if changes to the Bank's manpower policy are necessary;
4. Monitoring and evaluating the effectiveness of each employee; and
5. Providing inputs and solutions for the obstacles and problems that occur related to the Bank's employment.

Structure and Composition of Personnel Committee

The composition of the Personnel Committee according to the Board of Directors' Decision Letter No. 013/SK-DIR/12/24 dated 23 December 2024, is as follows:

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

Personnel Committe's Meeting

In accordance with the Board of Directors' Decision Letter No. 013/SK-DIR/12/24 dated 23 December 2024, the Personnel Committee is required to hold at least 3 (three) meetings a year. A meeting can be held if attended by at least 51% of the permanent members. The Personnel Committee held 9 (nine) meetings in 2024 with an attendance rate of 100.00%.

Komite Pengadaan

Komite Pengadaan adalah komite yang bertugas mendukung Direksi dalam mengawasi dan memastikan bahwa proses pengadaan barang dan jasa dilakukan secara transparan, efisien, dan sesuai dengan peraturan yang berlaku. Komite Pengadaan bertanggung jawab untuk meninjau kebijakan pengadaan, memantau pelaksanaannya, serta memastikan bahwa setiap keputusan pengadaan mendukung kepentingan strategis dan operasional Bank secara optimal.

Pedoman Komite Pengadaan

Dalam melaksanakan tugas dan tanggung jawabnya, Komite Pengadaan mengacu pada Surat Keputusan Direksi No. 010A/SK-DIR/01/23 tanggal 10 Januari 2023 tentang Komite Pengadaan PT Bank Victoria International Tbk.

Pernyataan Independensi Komite Pengadaan

Seluruh anggota Komite Pengadaan senantiasa mengedepankan prinsip independensi dalam setiap pelaksanaan tugas dan tanggung jawabnya demi menjamin tidak terjadinya hal-hal yang berpotensi menimbulkan benturan kepentingan dan kerugian bagi Bank.

Tugas dan Tanggung Jawab Komite Pengadaan

Tugas dan tanggung jawab serta realisasi pelaksanaan tugas dari Komite Pengadaan di tahun 2024 diuraikan sebagai berikut:

1. Meminta informasi untuk hal-hal yang diperlukan terkait pengadaan barang dan jasa dari berbagai pihak, baik internal maupun eksternal;
2. Memberikan persetujuan terhadap pengajuan pengadaan barang dan jasa;
3. Mengajukan persetujuan kepada Dewan Komisaris terhadap pengadaan barang dan jasa dengan nilai/harga minimum sesuai yang diatur pada Anggaran Dasar Bank; dan
4. Memberikan masukan kepada Direksi terkait hal-hal penting dan relevan dalam perumusan kebijakan pengadaan barang dan jasa.

Struktur dan Keanggotaan Komite Pengadaan

Susunan keanggotaan Komite Pengadaan sesuai Surat Keputusan No. 010A/SK-DIR/01/23 tanggal 10 Januari 2023, sebagai berikut:

1. Ketua diisi oleh Direktur Utama;
2. Wakil Ketua diisi oleh Wakil Direktur Utama;
3. Sekretaris diisi oleh *HCM & General Affairs Division Head*, dan *General Affairs Vice Division Head*;
4. Anggota Tetap diisi oleh Direktur; dan
5. Anggota Tidak Tetap diisi oleh Senior EVP, *Division Head*, dan *Vice Division Head*.

Procurement Committee

Procurement Committee is the committee that is in charge of supporting the Board of Directors in overseeing and ensuring that goods and services procurement process is carried out transparently, efficiently, and in accordance with the applicable regulations. The Procurement Committee is responsible for reviewing procurement policy, monitoring its implementation, and ensuring that every procurement decision optimally supports the Bank's strategic and operational interests.

Procurement Committee Charter

In performing its duties and responsibilities, the Procurement Committee refers to the Board of Directors' Decision Letter No. 010A/SK-DIR/01/23 dated 10 January 2023 on Procurement Committee of PT Bank Victoria International Tbk.

Statement of Independence of Procurement Committee

All members of Procurement Committee always prioritize independence principle in every implementation of their duties and responsibilities to ensure that there are no potential conflicts of interest nor losses for the Bank.

Duties and Responsibilities of Procurement Committee

Duties and responsibilities as well as realization of Procurement Committee's duties in 2024 were described as follows:

1. Asking for information on necessary matters related to the procurement of goods and services from various parties, both internal and external;
2. Providing approval on the procurement of goods and services;
3. Applying for approval to the Board of Commissioners on procurement of goods and services with minimum value/price as regulated in the Company's Articles of Association; and
4. Providing inputs to the Board of Directors regarding important and relevant matters in the formulation of procurement policies of goods and services.

Structure and Composition of Procurement Committee

The composition of the Procurement Committee according to the Decision Letter No. 010A/SK-DIR/01/23 dated 10 January 2023, is as follows:

1. Chairman held by President Director;
2. Vice Chairman held by Deputy President Director;
3. Secretary held by Head of HCM & General Affairs Division and General Affairs Vice Division Head;
4. Permanent Member held by Director; and
5. Non-Permanent Members held by EVP Senior, Division Head, and Vice Division Head.

Rapat Komite Pengadaan

Sesuai dengan Surat Keputusan Direksi No. 010A/SK-DIR/01/23 tanggal 10 Januari 2023, Komite Pengadaan diwajibkan untuk melaksanakan rapat minimal 3 (tiga) kali dalam setahun. Rapat dapat dilaksanakan apabila dihadiri oleh minimal 51% dari anggota tetap.

Komite Pengadaan telah melaksanakan rapat sebanyak 12 (dua belas) kali di tahun 2024 dengan tingkat kehadiran 100,00%.

Procurement Committee's Meeting

Pursuant to the Board of Directors' Decision Letter No. 010A/SK-DIR/01/23 dated 10 January 2023, the Procurement Committee is required to hold at least 3 (three) meetings a year. A meeting can be held if attended by at least 51% of the permanent members.

The Procurement Committee held 12 (twelve) meetings in 2024 with an attendance rate of 100.00%.

Komite Produk

Komite Produk mendukung Direksi dalam merumuskan kebijakan pengelolaan produk *liabilities* dan *wealth management* agar kompetitif dan menguntungkan. Komite Produk memperhatikan kepentingan nasabah dan Bank, serta menerapkan prinsip kehati-hatian dan manajemen risiko.

Pedoman Komite Produk

Dalam melaksanakan tugas dan tanggung jawabnya, Komite Produk mengacu pada Surat Keputusan Direksi No. 008/SK-DIR/08/24 tanggal 15 Agustus 2024 tentang Komite Produk PT Bank Victoria International Tbk.

Pernyataan Independensi Komite Produk

Seluruh anggota Komite Produk senantiasa mengedepankan prinsip independensi dalam setiap pelaksanaan tugas dan tanggung jawabnya demi menjamin tidak terjadinya hal-hal yang berpotensi menimbulkan benturan kepentingan dan kerugian bagi Bank.

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas Komite Produk

Tugas dan tanggung jawab serta realisasi pelaksanaan tugas dari Komite Produk di tahun 2024 diuraikan sebagai berikut:

1. Memberikan masukan, pertimbangan, dan rekomendasi kepada Direksi terkait pengelolaan produk *asset and liabilities*, termasuk rencana penerbitan, pengembangan, modifikasi, dan analisis produk yang sudah ada;
2. Mengawasi penerapan kebijakan produk secara konsisten dan bertanggung jawab serta menemukan solusi untuk mengatasi hambatan atau kendala yang muncul; dan
3. Memantau dan mengevaluasi risiko potensial terhadap perkembangan penjualan produk, poin-poin pengawasan kebijakan produk, strategi kebijakan produk, dan portofolio produk. Selain itu, memberikan masukan dan saran kepada Direksi untuk menentukan langkah-langkah perbaikan yang diperlukan.

Struktur dan Keanggotaan Komite Produk

Susunan keanggotaan Komite Produk sesuai Surat Keputusan Direksi No. 009/SK-DIR/08/24 tanggal 15 Agustus 2024 tentang Komite Produk PT Bank Victoria International Tbk, sebagai berikut:

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

Product Committee

The Product Committee supports the Board of Directors in formulating policies for managing liabilities and wealth management products to be competitive and profitable. The Product Committee pays attention to the interests of the Bank and its customers, and applies prudential principles and risk management.

Product Committee Charter

In performing its duties and responsibilities, the Product Committee refers to the Board of Directors' Decision Letter No. 008/SK-DIR/08/24 dated 15 August 2024 on Product Committee of PT Bank Victoria International Tbk.

Statement of Independence of Product Committee

All members of Product Committee always prioritize independence principle in every implementation of their duties and responsibilities to ensure that there are no potential conflicts of interest nor losses for the Bank.

Duties, Responsibilities, and the Realization of Product Committee Duties

Duties and responsibilities as well as realization of Product Committee's duties in 2024 were described as follows:

1. Providing input, considerations, and recommendations to the Board of Directors regarding management of asset and liabilities products, including the plan of launching, developing, modifying, and analyzing the existing products;
2. Monitoring the implementation of product policy consistently and responsibly and seeking solutions to overcome obstacles or constraints that arise; and
3. Monitoring and evaluating potential risks to product sales developments, product policy monitoring points, product policy strategies, and product portfolio. In addition, providing input and advice to the Board of Directors to determine the necessary improvements.

Structure and Composition of Product Committee

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

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

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

Rapat Komite Produk

Sesuai dengan Surat Keputusan Direksi No. 008/SK-DIR/08/24, Komite Produk diwajibkan untuk melaksanakan rapat minimal 3 (tiga) kali dalam setahun ataupun insidental. Rapat dapat dilaksanakan apabila dihadiri oleh minimal 50% + 1 dari anggota tetap. Komite Produk telah melaksanakan rapat sebanyak 4 (empat) kali di tahun 2024 dengan tingkat kehadiran 100,00%.

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

Product Committee's Meeting

Pursuant to the Board of Directors' Decision Letter No. 008/SK-DIR/08/24, the Product Committee is required to hold at least 3 (three) meetings in a year or incidentally. A meeting can be held if attended by at least 50% + 1 of the permanent members. The Product Committee held 4 (four) meetings in 2024 with an attendance rate of 100.00%.

Organ Pendukung Direksi
Board of Directors' Supporting Organ

Corporate Secretary

Corporate Secretary memiliki peranan penting dalam memastikan kelancaran komunikasi yang baik, antara Bank dengan para pemangku kepentingan, serta memastikan terselenggaranya penyampaian informasi secara tepat waktu dan akurat kepada seluruh pemangku kepentingan.

Pedoman *Corporate Secretary*

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

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

Corporate Secretary

Corporate Secretary has an important role in ensuring smooth and good communication between the Bank and its stakeholders, as well as ensuring the submission of information in a timely and accurate manner to all stakeholders.

Corporate Secretary Charter

The Corporate Secretary's work guideline refers to the Corporate Secretary charter adjusted to:

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

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

Tugas dan tanggung jawab serta realisasi pelaksanaan tugas dari *Corporate Secretary* di tahun 2024 diuraikan sebagai berikut:

1. Mengikuti perkembangan pasar modal, khususnya peraturan-peraturan yang berlaku di bidang pasar modal;
2. Memberikan pelayanan kepada masyarakat atas setiap informasi yang dibutuhkan pemodal berkaitan dengan kondisi Bank;
3. Memberikan masukan kepada Direksi Bank untuk mematuhi ketentuan Undang-Undang No. 8 Tahun 1995 tentang Pasar Modal dan peraturan pelaksanaannya; dan
4. Sebagai penghubung atau *contact person* antara Bank dengan Otoritas Jasa Keuangan serta masyarakat.

Duties, Responsibilities, and the Realization of Corporate Secretary Duties

Duties and responsibilities as well as realization of Corporate Secretary's duties in 2024 were described as follows:

1. To follow the capital market development, especially regulations applicable in capital market sector;
2. To provide services to the public for any information required by the investors in relation to the Bank's condition;
3. To provide input to the Bank's Board of Directors to comply with the provisions of Law No. 8 of 1995 on Capital Market and its implementing regulations; and
4. To be the liaison or contact person between the Bank and Financial Services Authority and public.

Profil Kepala Divisi *Corporate Secretary*
Profile of Head of Corporate Secretary Division

CAPRIE ARDIRA AZHAR

Kepala Divisi *Corporate Secretary*
Head of Corporate Secretary Division

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Jakarta

Usia / Age
37 tahun / years old

Domisili / Domicile
Jakarta

Dasar Pengangkatan dan Periode Menjabat

Keputusan Direksi No. 012/SK-DIR/HCM/01/21 tanggal 11 Januari 2021.

Riwayat Pendidikan

Sarjana Hukum dari Universitas Padjadjaran (2012).

Rangkap Jabatan

Di dalam Bank Victoria:
Tidak ada.

Di luar Bank Victoria:
Tidak ada.

Riwayat Jabatan

- *Associate Lawyer Makes & Partners Lawfirm* (2012-2014);
- *Legal & Corporate Secretary* PT Victoria Investama Tbk (2014-2018);
- *Head Legal and Compliance* PT Sucor Sekuritas (2018-2019); dan
- *Unit Head Corporate Secretary* Bank Victoria (2019-2021).

Sertifikasi

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

Hubungan Afiliasi

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

Basis of Appointment and Term of Office

Board of Directors' Decision No. 012/SK-DIR/HCM/01/21 dated 11 January 2021.

Education

Bachelor of Law from Padjadjaran University (2012).

Concurrent Positions

In Bank Victoria:
None.

Outside of Bank Victoria:
None.

History of Positions

- Associate Lawyer of Makes & Partners Lawfirm (2012-2014);
- Legal & Corporate Secretary of PT Victoria Investama Tbk (2014-2018);
- Head of Legal and Compliance of PT Sucor Sekuritas (2018-2019); and
- Corporate Secretary Unit Head of Bank Victoria (2019-2021).

Certification

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

Affiliation Relationship

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

Pelatihan dan/atau Peningkatan *Corporate Secretary*

Sepanjang tahun 2024, *Corporate Secretary* telah mengikuti pelatihan dan/atau program peningkatan kompetensi, baik yang diselenggarakan secara internal maupun eksternal dengan materi sebagai berikut:

Corporate Secretary's Training and/or Development Programs

Throughout 2024, the Corporate Secretary attended trainings and/or competency development programs, both organized internally and externally, with the following materials:

Tanggal Date	Materi Pengembangan Kompetensi Competency Development Material	Penyelenggara Organizer
31 Januari 2024 31 January 2024	*Innovate, Invest, Inspire: Strategic Planning for Listed Companies in 2024's Stock Market*	Indonesian Corporate Secretary Association
20 Januari 2024 20 January 2024	*Dealing with Volatility, Uncertainty, Complexity, and Ambiguity (VUCA) Challenges: Contextual Leadership Journey*	Bank Victoria
3 Februari 2024 3 February 2024	*Refreshment* Unit Kompetensi Manajemen Risiko Jenjang 5 Refreshment of Risk Management Competency Unit Level 5	PT Efektifpro Knowledge Source
3 Maret 2024 3 March 2024	*Corporate Culture* dan *Service* Corporate Culture and Service	Bank Victoria
6 Maret 2024 6 March 2024	Pembekalan: Pendampingan dan Mekanisme Pelaksanaan Resertifikasi Manajemen Risiko Jenjang 5 Briefing: Mentoring and Mechanism for Implementing Recertification of Risk Management Level 5	Bank Victoria
22 Maret 2024 22 March 2024	*Sharing Session* "Menjalin Silaturahmi dalam Kebersamaan" Sharing Session "Establishing Relationships in Togetherness"	Bank Victoria
26 Maret 2024 26 March 2024	Resertifikasi Manajemen Risiko Jenjang 5 Recertification of Risk Management Level 5	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institute
27 Mei 2024 27 May 2024	*Refreshment* Manajemen Risiko Jenjang 1-4 Badan Sertifikasi Manajemen Risiko Refreshment of Risk Management Level 1-4 Risk Management Certification Institution	PT Efektifpro Knowledge Source
5-12 Juli 2024 5-12 July 2024	*Training* Sosialisasi Office 365 Office 365 Dissemination Training	Bank Victoria
9 Agustus 2024 9 August 2024	*Sharing Session Market Update and Economic Outlook* Sharing Session on Market Update and Economic Outlook	Bank Victoria
24 September 2024	*Strategic Finance for Sustainability: The Role of Corporate Secretary as Board of Directors Business Partner to Boost Sustainability Awareness* Strategic Finance for Sustainability: The Role of Corporate Secretary as Board of Directors' Business Partner to Boost Sustainability Awareness	Indonesian Corporate Secretary Association
12 Oktober 2024 12 October 2024	Training Perlindungan Konsumen dan Perlindungan Data Pribadi Training on Consumer Protection and Personal Data Protection	Bank Victoria
4 November 2024	Pengenalan *International Financial Reporting Standards*: *Sustainability Disclosure Standards* S1 dan S2 Introduction to International Financial Reporting Standards: Sustainability Disclosure Standards S1 and S2	Indonesian Corporate Secretary Association
12 November 2024	*Training* Penerapan Strategi *Anti-Fraud* Training on Implementing Anti-Fraud Strategies	Victoria institute
23 November 2024	*Refreshment* Tipologi Tindak Pidana Pencucian Uang/Tindak Pidana Pendanaan Terorisme/Pencegahan dan Pemberantasan Pendanaan Senjata Pemusnah Massal melalui Kredit dan *Treasury* Refreshment on Typology of Money Laundering Crimes/Terrorist Financing Crimes/Prevention and Eradication of Weapons of Mass Destruction Financing through Credit and Treasury	Andara Sarana
29 November 2024	Pendalaman Peraturan Otoritas Jasa Keuangan No. 15/POJK.04/2022 tentang Pemecahan Saham dan Penggabungan Saham oleh Perusahaan Terbuka Intensification of Financial Services Regulation No. 15/POJK.04/2022 on Stock Split and Merger by Public Companies	Indonesian Corporate Secretary Association

Tanggal Date	Materi Pengembangan Kompetensi Competency Development Material	Penyelenggara Organizer
11 Desember 2024 11 December 2024	Prospek Ekonomi Tahun 2025: Mencapai Indonesia Emas 2045 Economic Prospects for 2025: Achieving Golden Indonesia 2045	Forum Komunikasi Direktur Kepatuhan Perbankan Communication Forum for Director of Banking Compliance
13 Desember 2024 13 December 2024	Seminar Sinergi Emiten dalam Membangun Pertumbuhan Ekonomi Berkelanjutan Seminar on Issuer Synergy in Establishing Sustainable Economic Growth	Asosiasi Emiten Indonesia Indonesian Public Listed Companies Association

Satuan Kerja Audit Internal

Satuan Kerja Audit Internal (SKAI) merupakan fungsi independen yang bertanggung jawab langsung kepada Direktur Utama. Fungsi ini mendukung manajemen dengan memberikan *assurance* dan konsultasi untuk meningkatkan nilai, efektivitas manajemen risiko, pengendalian, dan tata kelola Bank.

Pedoman SKAI

Pelaksanaan tugas dan tanggung jawab SKAI mengacu pada Piagam Audit Internal, Sistem, Prosedur, dan Teknik Pemeriksaan Internal.

Tugas dan Tanggung Jawab SKAI

SKAI memiliki tugas dan tanggung jawab sebagai berikut:

1. Membantu tugas Direktur Utama dan Dewan Komisaris dalam melakukan pengawasan dengan cara menjabarkan secara operasional baik perencanaan, pelaksanaan, maupun pemantauan hasil audit;
2. Menyusun dan melaksanakan perencanaan audit tahunan, antara lain analisis dan penilaian di bidang keuangan, akuntansi, operasional, perkreditan, dan kegiatan lain;
3. Mengidentifikasi segala kemungkinan untuk memperbaiki dan meningkatkan efisiensi penggunaan sumber daya dan dana;
4. Memberikan saran perbaikan dan informasi yang objektif tentang kegiatan yang diperiksa pada semua tingkatan manajemen;
5. Memantau, menganalisis, dan melaporkan pelaksanaan tindak lanjut perbaikan yang telah disarankan;
6. Memberikan penilaian tingkat keyakinan kualitas pelaksanaan tugas atas proses manajemen risiko, sistem pengendalian internal dan tata kelola usaha telah dilaksanakan secara cukup dan efektif di seluruh Unit Kerja Bank Victoria;
7. Membuat laporan hasil audit dan menyampaikan laporan tersebut kepada Direktur Utama dan Dewan Komisaris;
8. Bekerja sama dengan Komite Audit dalam melakukan pengawasan dan memonitor pelaksanaan tindak lanjut perbaikan atas temuan SKAI; dan
9. Memberikan saran perbaikan dan informasi yang objektif tentang kegiatan yang diperiksa pada semua tingkatan manajemen.

Internal Audit Work Unit

Internal Audit Work Unit (SKAI) is an independent function directly responsible to the President Director. This function supports the management by providing assurance and consultation to increase value, effectiveness of risk management, control, and governance of the Bank.

SKAI Charter

The implementation of duties and responsibilities of SKAI refers to the Internal Audit Charter, Internal Audit Audit System, Procedure, and Technique.

Duties and Responsibilities of the SKAI

The SKAI has duties and responsibilities as follows:

1. Assisting the President Director and Board of Commissioners in monitoring by detailing the operations of planning, implementation, or monitoring of the audit result;
2. Preparing and conducting the annual audit planning, among others, the analysis and assessment in the fields of finance, accounting, operations, credit, and other activities;
3. Identifying all possibilities to improve and enhance the efficient use of resources and funds;
4. Providing advice for improvement and objective information on activities audited at all management levels;
5. Monitoring, analyzing, and reporting the follow-up actions of the suggested corrective actions;
6. Assessing the confidence level of quality of duty implementation of the risk management process, internal control system, and business governance that has been implemented sufficiently and effectively in all Work Units of Bank Victoria;
7. Preparing the audit result report and submitting the report to the President Director and the Board of Commissioners;
8. Cooperating with the Audit Committee in supervising and monitoring the implementation of follow-up for improvements to SKAI findings; and
9. Providing recommendations for improvement and objective information on activities audited at all management levels.

Kedudukan dan Struktur SKAI

SKAI berada langsung di bawah Direktur Utama dan beroperasi secara independen. Divisi ini memiliki jalur komunikasi langsung dengan Komite Audit dan Dewan Komisaris serta akses penuh terhadap seluruh aktivitas Bank. Sebagai mitra manajemen dalam penerapan GCG, Kepala SKAI diangkat dan diberhentikan oleh Direktur Utama dengan persetujuan Dewan Komisaris, dan setiap perubahan tersebut dilaporkan kepada regulator.

Position and Structure of SKAI

The SKAI is directly under the President Director and operates independently. This division has a direct communication line with the Audit Committee and the Board of Commissioners, and has full access to all activities at the Bank. As a management partner in implementing GCG, the Head of SKAI is appointed and dismissed by the President Director, with approval from the Board of Commissioners, and with any changes reported to the regulator.

Profil Kepala Divisi SKAI
Profile of Head of SKAI Division

DJOKO SOENDJOJO

Kepala Divisi SKAI
Head of SKAI Division

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Surabaya

Usia / Age
56 tahun / years old

Domisili / Domicile
Jakarta

Dasar Pengangkatan dan Periode Menjabat

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

Riwayat Pendidikan

Sarjana Ekonomi dari STIE Malangkucecwara Malang (1993).

Rangkap Jabatan

Di dalam Bank Victoria:
Tidak ada.

Di luar Bank Victoria:
Tidak ada.

Riwayat Jabatan

- *Staff* Senior Akuntansi dan Keuangan PT Bank Andromeda Kantor Pusat Jakarta (1995–1997);
- *Staff* Senior Akuntansi dan Keuangan PT Bank Alfa BBKU Kantor Pusat Jakarta (1997–1999);
- Staff Administrasi BBO-BBKU BBPN/IBRA Kantor Pusat Jakarta (2000–2004);
- *Staff* Senior Keuangan & *Custody* Tim Likuidasi PT Bank Prasidha Utama Kantor Pusat Jakarta (2004);
- Kepala Seksi Manajemen Risiko Bank Victoria (2005);
- Kepala Seksi *Financial Control* Bank Victoria (2005–2006);
- Kepala Satuan Kerja Audit Interen (SKAI) Bank Victoria (2006); dan
- Kepala Divisi Administrasi Pengkreditan Bank Victoria (2015-2018).

Sertifikasi

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

Hubungan Afiliasi

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

Basis of Appointment and Term of Office

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

Education

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

Concurrent Positions

In Bank Victoria:
None.

Outside of Bank Victoria:
None.

History of Positions

- Senior Accounting and Finance Staff of PT Bank Andromeda, Jakarta Head Office (1995–1997);
- Senior Accounting and Finance Staff of PT Bank Alfa BBKU, Jakarta Head Office (1997-1999);
- Administration Staff of BBO-BBKU BBPN/IBRA, Jakarta Head Office (2000–2004);
- Senior Staff of Finance & Custody of Liquidation Team of PT Bank Prasidha Utama, Jakarta Head Office (2004);
- Head of Risk Management Section of Bank Victoria (2005);
- Head of Financial Control Section of Bank Victoria (2005-2006);
- Head of Internal Audit Unit (IAU) of Bank Victoria (2006); and
- Head of Credit Administration Division of Bank Victoria (2015-2018).

Certification

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

Affiliation Relationship

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

Komposisi dan Sertifikasi Profesi SKAI

Pada tahun 2024, Bank memiliki 8 (delapan) personel di SKAI yang telah memiliki sertifikasi manajemen risiko perbankan dan sertifikasi profesi audit internal, dengan rincian sebagai berikut:

Composition and Professional Certification of SKAI

In 2024, the Bank has 8 (eight) personnel of SKAI who have banking risk management certification and internal audit professional certification, with the following details:

Nama Name	Jabatan Position	Sertifikasi Certifications	Masa Berlaku Validity Period	Penyelenggara Organizer
Sertifikasi Audit Internal **Internal Audit Certification**				
Djoko Soendjojo	Kepala Divisi Head of Division	Level Auditor Supervisor Supervisor Auditor Level	5 Desember 2026 5 December 2026	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Ferry A Deuning	Kepala Unit Head of Unit	Level Supervisor Supervisor Level	25 November 2027	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Fadillah Syarif	*Senior Officer*	Level Supervisor Supervisor Level	5 Desember 2026 5 December 2026	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Diah Rucihto Januar	*Senior Officer*	Level Auditor Auditor Level	25 November 2027	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Wilma Pramana	*Officer*	Level Auditor Auditor Level	7 September 2023	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Marcell Reinhart	*Officer*	-	-	-
Jefferson Lianto Mualim	*Officer*	-	-	-
Hana Kamilah Gatra Wijaya	*Officer*	-	-	-
Sertifikasi Manajemen Risiko **Risk Management Certification**				
Djoko Soendjojo	Kepala Divisi Head of Division	Manajemen Risiko Jenjang 6 Risk Management Level 6	1 Maret 2027 1 March 2027	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Ferry A Deuning	Kepala Unit Head of Unit	Manajemen Risiko Jenjang 5 Risk Management Level 5	26 Maret 2027 26 March 2027	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Fadillah Syarif	*Senior Officer*	Manajemen Risiko Jenjang 5 Risk Management Level 5	26 Maret 2027 26 March 2027	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Diah Rucihto Januar	*Senior Officer*	Manajemen Risiko Jenjang 4 Risk Management Level 4	6 September 2027	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Wilma Pramana	*Officer*	Manajemen Risiko Jenjang 5 Risk Management Level 5	29 November 2026	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Marcell Reinhart	*Officer*	-	-	-
Jefferson Lianto Mualim	*Officer*	-	-	-
Hana Kamilah Gatra Wijaya	*Officer*	-	-	-
Certificate Anti-Fraud Manager				
Ferry A Deuning	Kepala Unit Head of Unit	*Certificate Anti-Fraud Manager*	8 November 2026	Asia Anti Fraud

Rapat SKAI

SKAI secara berkala melaksanakan rapat bersama Komite Audit, Direksi, dan Dewan Komisaris minimal 4 (empat) kali dalam setahun. Rapat dilaksanakan untuk membahas laporan hasil pemeriksaan audit triwulan yang dilakukan oleh SKAI.

SKAI telah melaksanakan rapat dengan Dewan Komisaris, Direksi, dan/atau Komite Audit sebanyak 12 (dua belas) kali di tahun 2024. Agenda yang dibahas dalam rapat tersebut meliputi progres pemeriksaan dan realisasi hasil pemeriksaan.

SKAI Meeting

SKAI regularly holds meetings with Audit Committee, Board of Directors, and Board of Commissioners at least 4 (four) times in a year. Meetings are held to discuss the quarter report of audit results conducted by SKAI.

SKAI held 12 (twelve) meetings with the Board of Commissioners, Board of Directors, and/or Audit Committee in 2024. The agenda discussed in the meeting covers audit progress and realization of audit results.

Rencana dan Realisasi Pelaksanaan Kerja SKAI

Sepanjang tahun 2024, pelaksanaan pemeriksaan telah berjalan sesuai dengan rencana yang telah ditetapkan. Setiap pemeriksaan dilakukan tepat waktu, dan seluruh tahapan audit berhasil diselesaikan sesuai jadwal yang direncanakan. Dengan demikian, proses pengawasan dan evaluasi terhadap berbagai unit kerja dapat berjalan optimal dan selaras dengan tujuan yang telah ditetapkan.

Work Plan and Realization of SKAI

Throughout 2024, audit was implemented according to the established plan. Every audit was carried out on time, and all stages of audit were successfully completed according to the planned schedule. Thus, the supervision and evaluation process of various work units are carried out optimally and in line with the established objectives.

Pemeriksaan Audit	**Objek Pemeriksaan** Audit Object
Operasional dan Kredit Cabang Branch Operations and Credit	KCU BIP
	KCU Senayan
	KCU Cideng
	KCU Fatmawati
	KCU Kelapa Gading
	KCU Semarang
	KCU Surabaya
	KCU Bogor
	KCU Makassar
Unit Kerja Bisnis Business Unit	*Treasury Division, Settlement & FI*
	Commercial Banking Division
	SME I & Consumer Banking Division
	Special Asset Management Division
Unit Kerja Non-Bisnis Non-Business Unit	*Credit Risk Review Division*
	Loan & Trade Operation Division
	Credit Monitoring & Collection Department
	Credit Legal Division
	Laporan Hasil Pemeriksaan Kepatuhan Bank Indonesia - *Real Time Gross Settlement* (LHPK BI-RTGS), Bank Indonesia - *Scripless Securities Settlement System* (BI-SSSS), Sistem Jaringan Nasional Bank Indonesia (SJNBI), dan Kegiatan Penyelesaian Dana Hasil Negosiasi (KPDHN) Compliance Audit Report of Bank Indonesia - Real Time Gross Settlement (LHPK BI-RTGS), Bank Indonesia - Scripless Securities Settlement System (BI-SSSS), Bank Indonesia National Network System (SJNBI), and Negotiated Fund Settlement Activities (KPDHN)
	Lembaga Penjamin Simpanan - *Single Customer View* (LPS-SCV) Indonesia Deposit Insurance Corporation - Single Customer View (LPS-SCV)
	Sistem Manajemen Keamanan Informasi – ISO 27001 Information Security Management System - ISO 27001
	Information Technology Division
	Satuan Kerja Manajemen Risiko Terintegrasi Integrated Risk Management Work Unit
	Fungsi Kepatuhan – Perlindungan Konsumen Compliance Function - Consumer Protection

Temuan dan Tindak Lanjut Hasil Audit

Di tahun 2024, hasil audit menghasilkan sejumlah temuan yang telah dilaporkan kepada Dewan Komisaris dan Direksi. Temuan-temuan tersebut disertai dengan rekomendasi yang harus segera ditindaklanjuti oleh *auditee*. Rekomendasi yang telah diselesaikan akan diinformasikan kembali kepada *auditee* dan Direksi, sementara rekomendasi yang

Findings and Follow-Up on Audit Results

In 2024, the audit resulted a number of findings reported to the Board of Commissioners and Board of Directors. These findings are accompanied by recommendations that must be followed up immediately by the auditee. Completed recommendations will be re-informed to the auditee and Board of Directors, while

masih tertunda akan terus dipantau hingga penyelesaiannya oleh SKAI. Sepanjang tahun 2024, terdapat 524 temuan hasil audit, di mana 502 temuan atau 95,80% telah berhasil ditindaklanjuti, sementara 22 temuan atau 4,20% masih dalam proses perbaikan.

Pelatihan dan/atau Peningkatan SKAI

Sepanjang tahun 2024, SKAI telah mengikuti pelatihan dan/atau program peningkatan kompetensi, baik yang diselenggarakan secara internal maupun eksternal, sebanyak 45 kali, dengan materi antara lain:

1. *Training* Pembekalan: Pendampingan dan Mekanisme Pelaksanaan Resertifikasi Manajemen Risiko Jenjang 5;
2. *Training* Pembekalan: Pendampingan dan Mekanisme Pelaksanaan Resertifikasi Manajemen Risiko Jenjang 6;
3. Program Pembekalan Audit Level Auditor;
4. *Training* Audit Teknologi Informasi Berbasis Risiko Sesuai Peraturan Otoritas Jasa Keuangan;
5. *Training* Pengujian Keamanan *Cyber* (*Table Top Exercise*);
6. *Training* Penundaan Kewajiban Pembayaran Utang (PKPU);
7. *Training Customer Due Diligence* Khusus Warga Negara Asing;
8. *Training* dan Uji Sertifikasi *Certified Anti-Fraud Professional* (CAFP);
9. *Training* Perlindungan Konsumen dan Perlindungan Data Pribadi;
10. Uji Sertifikasi Manajemen Risiko Jenjang 4;
11. Uji Kompetensi Bidang Audit Level Auditor;
12. Uji Kompetensi Bidang Audit Level Supervisor;
13. Analisa Laporan Keuangan; dan
14. *Training* Praktik Manajemen Audit Internal Sesuai dengan The Institute of Internal Auditors Global Internal Audit Standar 2024.

pending recommendations will continuously be monitored until the completion by SKAI. Throughout 2024, there were 524 audit findings, in which 502 findings or 95.80% were successfully followed up, while 22 findings or 4.20% were still undergoing improvement process.

SKAI Training and/or Development Programs

Throughout 2024, the SKAI attended 45 trainings and/or competency development programs, both organized internally and externally, with materials including:

1. Briefing Training: Mentoring and Mechanism for Implementing Recertification of Risk Management Level 5;
2. Briefing Training: Mentoring and Mechanism for Implementing Recertification of Risk Management Level 6;
3. Preparatory Program for Auditor Level Audit;
4. Training on Risk-Based Information Technology Audit according to Financial Services Authority Regulations;
5. Cyber Security Testing Training (Table Top Exercise);
6. Training on Debt Payment Obligation Suspension (PKPU);
7. Customer Due Diligence Training for Foreign Citizen;
8. Certified Anti-Fraud Professional (CAFP) Training and Certification Test;
9. Training on Customer Protection and Personal Data Protection;
10. Test of Risk Management Certification Level 4;
11. Audit Competency Test for Auditor Level;
12. Audit Competency Test for Supervisor Level;
13. Financial Statements Analysis; and
14. Training on Internal Audit Management Practice in Accordance with the Institute of Internal Auditors Global Internal Audit Standard 2024.

Akuntan Publik
Public Accountant

Kebijakan Penunjukan Akuntan Publik

Berdasarkan Peraturan Otoritas Jasa Keuangan No. 37/POJK.03/2019 tentang Transparansi dan Publikasi Laporan Bank dan Peraturan Otoritas Jasa Keuangan No. 9 Tahun 2023 tentang Penggunaan Jasa Akuntan Publik dan Kantor Akuntan Publik dalam Kegiatan Jasa Keuangan, serta hasil keputusan RUPS Tahunan tanggal 14 Juni 2024 yang berdasarkan rekomendasi Dewan Komisaris dan Komite Audit, diputuskan bahwa Bank menunjuk Yovita dan Kantor Akuntan Publik Purwantono, Sungkoro & Surja (*member of Ernst & Young*) yang masing-masing terdaftar

Policy in Appointing Public Accountant

Pursuant to the Financial Services Authority Regulation No. 37/POJK.03/2019 on Transparency and Publication of Bank Reports and Financial Services Authority Regulation No. 9 of 2023 on the Use of Services of Public Accountant and Public Accounting Firm in Financial Services Activities, as well as the Annual GMS resolutions dated 14 June 2024 based on the recommendations of Board of Commissioners and Audit Committee, it was decided that the Bank appointed Yovita and Public Accounting Firm Purwantono, Sungkoro & Surja (member of Ernst & Young), respectively registered

di Otoritas Jasa Keuangan sebagai Akuntan Publik dan Kantor Akuntan Publik untuk melakukan audit atas Laporan Keuangan Konsolidasian Bank tahun buku 2024.

Dalam melaksanakan audit tersebut, Kantor Akuntan Publik Yovita telah menunjukkan sikap independen, kompeten, profesional, dan objektif sesuai dengan Standar Profesional Akuntan Publik sehingga Laporan Keuangan Konsolidasian Bank disajikan secara wajar dan transparan.

with the Financial Services Authority as Public Accountant and Public Accounting Firm to audit the Bank's Consolidated Financial Statements for the 2024 fiscal year.

In carrying out audit, Public Accounting Firm Yovita demonstrates an independent, competent, professional, and objective attitude in accordance with the Public Accountant Professional Standards, and therefore, the Bank's Consolidated Financial Statements are presented in a fair and transparent manner.

Periode Akuntan Publik dan Kantor Akuntan Publik

Bank telah mematuhi Peraturan Otoritas Jasa Keuangan No. 9 Tahun 2023 dalam penunjukan akuntan publik dan kantor akuntan publik. Akuntan publik yang sama dapat digunakan maksimal 7 (tujuh) tahun, sementara evaluasi penggunaan kantor akuntan publik bergantung pada hasil penilaian Komite Audit terkait potensi risikonya.

Pada tahun 2024, penunjukan Akuntan Publik Yovita merupakan penunjukan yang keempat kalinya, dengan Kantor Akuntan Publik Purwantono, Sungkoro & Surja (*member of Ernst & Young*) yang telah mendapatkan persetujuan dari Otoritas Jasa Keuangan melalui Surat No. 06400/PSS-AS/2024 tanggal 24 Oktober 2024.

Sementara itu, informasi akuntan publik dan kantor akuntan publik yang digunakan Bank dalam 5 (lima) tahun terakhir sebagai berikut:

Period of Public Accountant and Public Accounting Firm

The Bank has complied with Financial Services Authority Regulation No. 9 of 2023 in appointing public accountant and public accounting firm. The same public accountant can be used for a maximum of 7 (seven) years, while the evaluation of the use of public accounting firm depends on the results of Audit Committee's assessment of its potential risks.

In 2024, the appointment of Public Accountant Yovita was the fourth appointment, with Public Accounting Firm Purwantono, Sungkoro & Surja (member of Ernst & Young) obtained approval from the Financial Services Authority through Letter No. 06400/PSS-AS/2024 dated 24 October 2024.

Meanwhile, information on public accountants and public accounting firms used by the Bank in the past 5 (five) years is as follows:

Uraian Description	**Tahun Buku** Fiscal Year				
	2024	**2023**	**2022**	**2021**	**2020**
Kantor Akuntan Publik Public Accounting Firm	Purwantono, Sungkoro & Surja (member of Ernst & Young)				Tanudiredja, Wibisana, Rintis dan Rekan *(member of Pricewaterhouse Cooper)* Tanudiredja, Wibisana, Rintis and Partners (member of Pricewaterhouse Cooper)
Akuntan Publik Public Accountant	Yovita				Jimmy Pangestu, SE
Nomor Izin Akuntan Publik Public Accountant License Number	AP. 0242				1124
Masa Kontrak Contract Period	Januari-Desember January-December				Januari-Desember January-December
Biaya (Rp) Fee (Rp)	**1,720,000,000**	1,650,000,000	2,320,000,000	1,550,000,000	1,700,000,000

Jasa Non-Audit yang Diberikan Akuntan Publik

Pada tahun 2024, tidak terdapat jasa lain yang diberikan oleh Kantor Akuntan Publik Purwantono, Sungkoro & Surja selain jasa audit Laporan Keuangan Tahun Buku 2024. Dengan demikian, tidak terdapat biaya yang dikeluarkan untuk jasa non-audit.

Non-Auditing Services Provided by Public Accountant

In 2024, there were no other services provided by Public Accounting Firm Purwantono, Sungkoro & Surja other than auditing services for Financial Statements for 2024 fiscal year. As such, there was no expense incurred for non-audit services.

Efektivitas Pelaksanaan Audit oleh Akuntan Publik

Secara aktif, Komite Audit berkomunikasi akuntan publik dan kantor akuntan publik yang ditunjuk sebelum proses audit dimulai mengenai hal-hal yang menjadi perhatian bagi Komite Audit, serta melakukan evaluasi atas proses pelaksanaan audit oleh akuntan publik dan kantor akuntan publik tersebut setelah proses audit selesai dilakukan untuk kemudian hasilnya disampaikan ke Otoritas Jasa Keuangan.

Effectiveness of Audit Implementation by Public Accountant

The Audit Committee actively communicates with the appointed public accountant and public accounting firm prior to audit process regarding matters of concern to the Audit Committee, and evaluates the audit process by public accountant and public accounting firm upon the completion of audit process, then its results are submitted to the Financial Services Authority.

Pengawasan dan Komunikasi Akuntan Publik dan Bank

Bank juga mewajibkan akuntan publik untuk melakukan komunikasi rencana metodologi dan sampel audit atas Laporan Keuangan Bank kepada Komite Audit dan Auditor Internal. Komite Audit dan Auditor Internal juga terus mengawasi dan memastikan kelancaran dan kesesuaian pelaksanaan proses audit eksternal dengan ketentuan yang berlaku sekaligus melakukan evaluasi atas kualitas proses audit. Pengawasan dan pemantauan terhadap kinerja akuntan publik dan kantor akuntan publik dibahas pada rapat Komite Audit yang diikuti oleh Auditor Internal dan Direksi terkait. Dalam rapat tersebut juga dibahas mengenai tindak lanjut temuan-temuan audit oleh akuntan publik dan kantor akuntan publik, sehingga dapat memberikan hasil audit yang komprehensif dan optimal.

Supervision and Communication of Public Accountant and the Bank

The Bank also requires public accountant to communicate the methodological plan and audit sample for the Bank's Financial Statements to the Audit Committee and Internal Auditor. The Audit Committee and Internal Auditor also continue to supervise and ensure the smoothness and conformity of the external audit process with the applicable provisions, while evaluating the quality of audit process. Supervision and monitoring of the performance of public accountant and public accounting firm are discussed at Audit Committee meeting, attended by Internal Auditor and relevant Board of Directors. The meeting also discusses follow-up to audit findings by public accountant and public accounting firm, so as they can provide comprehensive and optimal audit results.

Sistem Pengendalian Internal
Internal Control System

Bank menerapkan Sistem Pengendalian Intern (SPI) untuk mendukung pencapaian tujuan Bank dan mengidentifikasi potensi risiko. SPI berperan penting dalam menjaga operasional yang sehat, aman, dan terkendali, serta dirancang untuk melindungi aset Bank, memastikan laporan yang akurat, meningkatkan kepatuhan, mengurangi risiko kerugian dan penyimpangan, serta meningkatkan efektivitas dan efisiensi biaya.

The Bank implements Internal Control System (SPI) to support the achievement of the Bank's objectives and identify potential risks. SPI plays an important role in maintaining sound, safe, and controlled operations, and is designed to protect Bank's assets, ensure accurate reporting, improve compliance, reduce risk of losses and irregularities, and improve cost effectiveness and efficiency.

Ruang Lingkup Pengendalian Internal

SPI Bank dijalankan dengan mengacu pada Surat Edaran Otoritas Jasa Keuangan No. 35/SEOJK.03/2017 tentang Pedoman Standar Pengendalian Internal bagi Bank Umum. Sementara tanggung jawab implementasi SPI melibatkan seluruh pihak dalam organisasi, meliputi:

1. Direksi
   Bertanggung jawab menciptakan dan memelihara pengendalian internal yang efektif, serta memastikan bahwa sistem tersebut berjalan secara aman dan andal sesuai dengan tujuan pengendalian internal yang telah ditetapkan oleh Bank.

Internal Control Scope

The Bank's SPI is carried out by referring to the Financial Services Authority Circular Letter No. 35/SEOJK.03/2017 on Guidelines for Internal Control Standards for Commercial Banks. Meanwhile, the responsibility for implementing SPI involves all parties in the organization, including:

1. Board of Directors
   Responsible for creating and maintaining effective internal control, and ensuring that the system runs safely and reliably in accordance with the internal control objectives specified by the Bank.

2. Dewan Komisaris
   Bertanggung jawab mengawasi pelaksanaan pengendalian internal secara umum, termasuk kebijakan Direksi yang menetapkan pengendalian internal.
3. SKAI
   Bertanggung jawab mengevaluasi dan berperan aktif dalam meningkatkan efektivitas pengendalian internal secara berkesinambungan, berkaitan dengan pelaksanaan operasional Bank yang berpotensi menimbulkan kerugian dalam pencapaian sasaran yang telah ditetapkan oleh manajemen. Terkait hal ini, Bank senantiasa memastikan agar jalur pelaporan telah memadai dan auditor internal telah memiliki keahlian, khususnya terkait praktik dan penerapan penilaian risiko.
4. Pejabat Eksekutif dan Karyawan
   Bertanggung jawab melaksanakan pengendalian internal yang telah ditetapkan oleh manajemen Bank. Melalui pengendalian internal yang efektif, tanggung jawab Pejabat Eksekutif dan karyawan Bank akan meningkat, mendorong budaya risiko yang memadai, serta mempercepat proses identifikasi terhadap praktik perbankan yang tidak sehat dan terhadap organisasi melalui sistem deteksi dini yang efisien.
5. Pihak Eksternal
   Antara lain meliputi Otoritas Jasa Keuangan, auditor eksternal, dan nasabah Bank yang berkepentingan terhadap terlaksananya pengendalian internal yang andal dan efektif.

Dewan Komisaris dan Direksi juga memiliki peran penting dalam memastikan komitmen, perilaku, kepedulian, dan penerapan pengendalian internal yang efektif di seluruh kegiatan operasional Bank. Sebagai bagian dari tanggung jawab ini, Dewan Komisaris dan Direksi menetapkan elemen-elemen penting dalam lingkungan pengendalian, yaitu:

1. Struktur organisasi yang memadai;
2. Gaya kepemimpinan dan filosofi manajemen Bank;
3. Integritas dan nilai-nilai etika, serta kompetensi seluruh karyawan;
4. Kebijakan dan prosedur *human capital* Bank;
5. Atensi dan arahan manajemen Bank dan Komite lainnya, seperti Komite Pemantau Risiko; dan
6. Faktor-faktor eksternal yang memengaruhi operasional Bank dan penerapan manajemen risiko.

Berbagai faktor penting yang menjadi pertimbangan dalam menetapkan unsur-unsur lingkungan pengendalian dan mengimplementasikan pengendalian internal meliputi:

1. Total aset;
2. Jenis produk dan aktivitas yang ditawarkan, termasuk produk dan aktivitas baru;
3. Kompleksitas operasional, termasuk jaringan kantor;
4. Profil risiko dari setiap kegiatan usaha;
5. Metode yang digunakan untuk pengolahan data dan teknologi informasi, serta metodologi yang diterapkan untuk pengukuran, pemantauan, dan pembatasan (limit) risiko; dan
6. Ketentuan dan peraturan perundang-undangan.

2. Board of Commissioners
   Responsible for supervising the implementation of internal control in general, including the Board of Directors' policies that establish internal control.
3. SKAI
   Responsible for evaluating and taking an active role in improving the effectiveness of internal control on an ongoing basis, in relation to the implementation of the Bank's operations that may potentially incur losses in achieving the targets specified by the management. In this regard, the Bank consistently ensures that reporting channels are adequate and that internal auditors have the expertise, particularly regarding the practice and application of risk assessments.
4. Executive Officers and Employees
   Responsible for implementing the internal control established by the Bank's management. Through effective internal control, the responsibilities of Executive Officers and Bank employees will improve and promote an adequate risk culture, as well as accelerate the process of identifying unhealthy banking practices and organization through an efficient early-detection system.
5. External Parties
   Among others including the Financial Services Authority, external auditors, and Bank's customers who have an interest in the implementation of reliable and effective internal controls.

The Board of Commissioners and Board of Directors also have an important role in ensuring effective commitments, behaviors, concerns, and implementation of internal controls throughout the Bank's operational activities. As part of this responsibility, the Board of Commissioners and Board of Directors established important elements in controlled environment, namely:

1. Sufficient organizational structure;
2. Bank's leadership style and management philosophy;
3. Integrity and ethical values, as well as the competence of all employees;
4. Bank's human capital policies and procedures;
5. Attention and direction of the Bank's management and other Committees, such as Risk Monitoring; and
6. External factors affecting the Bank's operations and the risk management implementation.

Various important factors that are considered in establishing the elements of controlled environment and implementing internal control include:

1. Total assets;
2. The types of products and activities offered, including new products and activities;
3. Operational complexity, including office network;
4. Risk profile of each business activity;
5. Methods used for data and information technology processing, as well as methodology applied for risk measurement, monitoring, and limit; and
6. Provisions and laws and regulations.

Kesesuaian Pengendalian Internal dengan Kerangka COSO

Tujuan penerapan SPI di Bank adalah untuk memastikan efektivitas operasional, keandalan pelaporan, serta kepatuhan terhadap ketentuan yang berlaku, sesuai dengan kerangka pengendalian internal yang dikembangkan oleh *Committee of Sponsoring Organizations of the Treadway Commission* (COSO). COSO membagi pengendalian internal ke dalam 5 (lima) komponen yang saling terkait, yaitu:

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

Komponen Pengendalian Internal

Bank memiliki 5 (lima) komponen pengendalian internal yang saling berkaitan, dengan uraian sebagai berikut:

1. **Pengawasan oleh Manajemen dan Budaya Pengendalian**
   a. Dewan Komisaris bertanggung jawab untuk mengesahkan dan mengkaji kebijakan dan strategi usaha Bank, memahami dan mengendalikan risiko utama Bank, menetapkan struktur organisasi, dan memastikan pemantauan efektivitas implementasi SPI; dan
   b. Direksi bertanggung jawab untuk melaksanakan kebijakan dan strategi Dewan Komisaris, mengembangkan prosedur pengendalian risiko, mempertahankan struktur organisasi yang jelas, menetapkan kebijakan dan prosedur pengendalian internal, dan memantau efektivitas SPI.

   Dalam melaksanakan tanggung jawab tersebut, Dewan Komisaris dan Direksi bertanggung jawab untuk meningkatkan etika kerja dan integritas dalam menciptakan budaya organisasi yang menekankan pentingnya pengendalian internal di Bank. Hal ini dilakukan dengan:
   a. Menjadi panutan bagi seluruh karyawan, dengan komitmen pribadi tinggi terhadap pengembangan Bank yang sehat;
   b. Mengelola *human capital* dengan menempatkan karyawan sesuai keterampilan, pengetahuan, dan perilaku; dan
   c. Meningkatkan kesadaran karyawan tentang efektivitas tugas dan tanggung jawab mereka, serta mendorong karyawan untuk mengomunikasikan setiap permasalahan dalam kegiatan operasional Bank kepada manajemen terkait.

   Seluruh kebijakan, standar, dan prosedur operasional didokumentasikan untuk mendukung efisiensi penerapan budaya pengendalian. Bank juga mengelola kebijakan untuk menghindari peluang penyimpangan atau pelanggaran guna memperkuat nilai-nilai etika.

Conformity of Internal Control with COSO Framework

The objective of implementing SPI at the Bank is to ensure operational effectiveness, reporting reliability, and compliance with applicable regulations, in line with the internal control framework developed by the Committee of Sponsoring Organizations of the Treadway Commission (COSO). COSO divides internal control into 5 (five) interrelated components, which are:

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

Internal Control Components

The Bank has 5 (five) interrelated internal control components, described as follows:

1. **Control by the Management and Control Culture**
   a. The Board of Commissioners is responsible for validating and reviewing the Bank's business policies and strategies, understanding and controlling the Bank's main risks, determining the organizational structure, and ensuring the monitoring of the effectiveness of SPI implementation; and
   b. The Board of Directors is responsible for implementing policies and strategies of the Board of Commissioners, developing risk control procedure, maintaining a clear organizational structure, establishing internal control policies and procedures, and monitoring the effectiveness of SPI.

   In carrying out these responsibilities, the Board of Commissioners and Board of Directors are responsible for improving work ethics and integrity in creating an organizational culture that emphasizes the importance of internal control in the Bank. This is done by:
   a. Being role models to all employees, with a high personal commitment to the development of a sound Bank;
   b. Managing human capital by placing employees in accordance with their skills, knowledge, and behavior; and
   c. Raising employee awareness on the effectiveness of their duties and responsibilities, and encouraging employees to communicate to relevant management regarding every problem in the Bank's operational activities.

   All of the operational policies, standards, and procedures are documented to support the efficient implementation of the control culture. The Bank also manages policy to avoid opportunities of deviation or violation in order to strengthen ethical value.

2. Identifikasi dan Penilaian Risiko

Untuk mengidentifikasi, menganalisis, dan menilai risiko yang dihadapi, Direksi Bank melakukan penilaian risiko. Bank secara berkelanjutan memantau dan mengidentifikasi semua jenis risiko, menetapkan limit dan teknik pengendalian risiko dengan bantuan auditor internal sehingga cakupan audit lebih luas. Jika risiko belum terkendali, Bank akan melakukan peninjauan ulang pengendalian internal.

3. Kegiatan Pengendalian Internal dan Pemisahan Fungsi

Kegiatan pengendalian internal di Bank direncanakan dan dipantau secara efektif. Kegiatan pengendalian internal Bank mencakup kebijakan, prosedur, dan praktik yang diuraikan sebagai berikut:

a. Kaji Ulang Manajemen
   Direksi sebagai *top level management* melakukan kaji ulang melalui rapat berkala bersama Dewan Komisaris dan SKAI. Rapat tersebut membahas Laporan Hasil Pemeriksaan Audit untuk kaji ulang hasil pemeriksaan rutin dan khusus.
b. Kaji Ulang Kinerja Operasional
   SKAI secara rutin berkomunikasi dengan komite-komite di bawah Direksi, seperti ALCO, Komite Manajemen Risiko, dan Komite GCG untuk memastikan pengendalian internal pada level operasional.
c. Pengendalian Sistem Informasi
   Bank menerapkan pengendalian internal pada sistem informasi dan teknologi melalui audit rutin di Divisi *Information Technology* dan Divisi *Business Analytic and MIS*.
d. Pengendalian Aset Fisik
   Pengendalian atas aset fisik dilakukan melalui audit tahunan di Divisi *Human Capital Management & General Affair* untuk memastikan keamanan fisik aset Bank.
e. Dokumentasi
   Formalisasi dan pendokumentasian kebijakan, prosedur, sistem, standar akuntansi, dan proses audit dengan memadai. Selain itu, melakukan pembaruan berkala terhadap kebijakan dan SOP yang selanjutnya disampaikan kepada pejabat dan karyawan untuk mengakomodir kebutuhan Bank secara aktual.

Bank juga menerapkan prinsip pemisahan fungsi dalam kegiatan pengendalian internal untuk mencapai efektivitas dan mencegah kesalahan atau penyimpangan di setiap level organisasi. Prinsip pemisahan fungsi ini diwujudkan melalui Keputusan Direksi No. 031F/SK-DIR/05/23 tanggal 31 Mei 2023 tentang Pendelegasian Wewenang Biaya Unit Kerja *General Affair*.

4. Sistem Akuntansi, Informasi, dan Komunikasi

Sistem akuntansi mencakup metode dan catatan untuk mengidentifikasi, mengelompokkan, menganalisis, mengklasifikasi, mencatat, dan melaporkan transaksi sesuai standar akuntansi di Indonesia. Sementara itu, sistem informasi dikelola dengan baik dan

2. Risk Identification and Assessment

To identify, analyze, and assess risks that will be faced, the Bank's Board of Directors conducts risk assessment. The Bank continuously monitors and identifies all types of risks, establishes such risk limit and control technique with the assistance of the internal auditor for wider audit coverage. In the event that the risk has not been controlled, the Bank will re-assess the internal control.

3. Activities of Internal Control and Separation of Functions

Internal control activities at the Bank are planned and monitored effectively. The Bank's internal control activities include policies, procedures, and practices described as follows:

a. Management Review
   The Board of Directors as top-level management reviews through regular meetings with the Board of Commissioners and SKAI. Such meetings discuss the Audit Result Report to review the results of routine and special audits.
b. Operational Performance Review
   SKAI regularly communicates with committees under the Board of Directors, such as ALCO, Risk Management Committee, and GCG Committee to ensure that internal control is at the operational level.
c. Information System Control
   The Bank implements internal control over information and technology system through routine audit in Information Technology Division and Business Analytic and MIS Division.
d. Control of Physical Assets
   Physical asset control is performed through annual audit to Human Capital Management & General Affair Division to ensure the physical security of the Bank's assets.
e. Documentation
   Formalizing and documenting policies, procedures, systems, accounting standards, and audit process adequately. In addition, periodically renewing the policies and SOP which are then conveyed to officials and employees to accommodate the Bank's actual requirements.

The Bank also applies the principle of separation of functions in internal control activities to achieve effectiveness and prevent mistakes or deviations at every organizational level. This principle of function separation is manifested through the Board of Directors' Decision Letter No. 031F/SK-DIR/05/23 dated 31 May 2023 on Authorization Delegation of the General Affair Work Unit's Cost.

4. Accounting, Information, and Communication Systems

The accounting system includes methods and records to identify, group, analyze, classify, record, and report transactions in accordance with accounting standards in Indonesia. Meanwhile, the information system is properly

diperbarui secara berkala untuk menghasilkan laporan yang akurat dan tepat waktu mengenai kegiatan usaha, kondisi keuangan, manajemen risiko, dan pemenuhan ketentuan. Pengelolaan sistem informasi mencakup rencana pemulihan darurat dan *backup* untuk mencegah kegagalan usaha yang berisiko tinggi. Adapun sistem komunikasi dikelola agar dapat memberikan informasi secara tepat waktu kepada semua pihak, baik internal maupun eksternal.

5. **Kegiatan Pemantauan dan Tindakan Koreksi Penyimpangan**
   Bank secara berkala melakukan pemantauan dan evaluasi terhadap risiko utama, baik oleh Unit Kerja Operasional (*risk taking unit*) maupun oleh SKAI. Auditor internal melakukan pemeriksaan operasional dan keuangan di berbagai kantor Bank, mencakup perkreditan, Dana Pihak Ketiga (DPK), penerapan APU dan PPT, *Know Your Customer* (KYC), teller dan uang tunai, *security*, *service excellence*, Laporan Keuangan, gedung dan inventaris, dan lainnya. Setiap kelemahan dalam pengendalian internal yang diidentifikasi oleh unit risiko, auditor internal, ataupun pihak lain akan segera dilaporkan kepada pejabat atau Direksi yang berwenang untuk ditindaklanjuti.

Tinjauan atas Efektivitas Sistem Pengendalian Internal 2024

SPI dirancang untuk mengelola dan mengendalikan risiko dengan baik dan bukan untuk menghilangkan risiko tersebut. Pengawasan efektivitas jalannya SPI di Bank dilakukan oleh SKAI dan hasilnya disampaikan kepada Direksi serta dilaporkan ke Dewan Komisaris melalui Komite Audit. Pada tahun 2024, evaluasi tersebut telah menghasilkan keputusan bahwa SPI Bank masih selaras dengan prinsip-prinsip pengendalian serta secara keseluruhan memperlihatkan kualitas SPI Bank tetap berjalan dengan baik. Adapun terkait dengan permasalahan kecukupan pengendalian internal telah dilaporkan kepada Direksi dan langkah-langkah tindak lanjut telah dilakukan untuk meminimalisasi risiko. Laporan juga disampaikan kepada Dewan Komisaris melalui Komite Audit.

Pernyataan Dewan Komisaris dan Direksi atas Kecukupan Sistem Pengendalian Internal

Dewan Komisaris dan Direksi menyatakan bahwa Bank telah memiliki SPI yang efektif dan memadai dalam mengelola risiko-risiko yang dihadapi Bank selama tahun 2024. Risiko yang dihadapi tetap berada dalam batas toleransi dalam mendukung pencapaian tujuan Bank, di antaranya tercermin melalui operasional dijalankan secara efektif dan efisien, penyampaian Laporan Keuangan yang akurat dan dapat diandalkan, pengamanan aset Bank, dan kepatuhan terhadap hukum dan peraturan yang berlaku.

managed and updated periodically in order to produce accurate and timely reports on business activities, financial conditions, risk management, and compliance with provisions. The management of information system includes contingency recovery plans and back up to prevent high risk business failures. The communication system is managed to provide timely information to all parties, both internal and external.

5. **Monitoring Activities and Corrective Actions**
   The Bank periodically monitors and evaluates primary risks, both by the Operating Unit (risk taking unit) and by SKAI. Internal auditor conducts operational and financial auditing checks in various Bank's offices, including credit, Third Party Funds (DPK), AML and CTF implementation, Know Your Customer (KYC), tellers and cash, security, service excellence, Financial Statements, building and inventory, and others. Any weaknesses in internal control identified by risk taking units, internal auditors, or other parties must be immediately reported to the authorized officers or Directors for follow-up.

Overview of the Effectiveness of Internal Control System in 2024

SPI is designed to properly manage and control risks and not to eliminate these risks. Supervision of the effectiveness of SPI implementation at the Bank is carried out by SKAI and the results are submitted to the Board of Directors and reported to the Board of Commissioners through Audit Committee. In 2024, the evaluation resulted in a decision that the Bank's SPI was still in accordance with the principles of control and comprehensively showed that the quality of the Bank's SPI was still implemented properly. Regarding the issue of internal control adequacy, it has been reported to the Board of Directors and follow-up measures have been taken to minimize the risk. The report is also submitted to the Board of Commissioners through Audit Committee.

Statement of Board of Commissioners and Board of Directors on the Internal Control System Adequacy

The Board of Commissioners and Board of Directors stated that the Bank had an effective and adequate SPI in managing the risks faced by the Bank in 2024. The risks faced remained within the tolerance limit in supporting the achievement of the Bank's objectives, which were reflected in effective and efficient operations, submission of accurate and reliable Financial Statements, safeguarding of Bank's assets, and compliance with applicable laws and regulations.

Fungsi Kepatuhan
Compliance Function

Fungsi Kepatuhan Bank berperan dalam meningkatkan budaya kepatuhan untuk mendukung praktik GCG. Fungsi Kepatuhan berfokus pada upaya preventif untuk mengurangi risiko kepatuhan dan memastikan bahwa kebijakan, ketentuan, sistem, prosedur, serta kegiatan usaha Bank sesuai dengan ketentuan Otoritas Jasa Keuangan dan peraturan perundang-undangan, termasuk pemenuhan komitmen kepada regulator tepat waktu.

The Bank's Compliance Function plays a role in improving the culture of compliance to support GCG practices. The Compliance Function focuses on preventive efforts to reduce compliance risks and ensure that the Bank's policies, provisions, systems, procedures, and business activities are in accordance with the provisions of Financial Services Authority and laws and regulations, including in fulfilling commitments to regulators in a timely manner.

Pedoman Fungsi Kepatuhan

Pelaksanaan tugas dan tanggung jawab Fungsi Kepatuhan berpedoman pada Peraturan Otoritas Jasa Keuangan No. 46/POJK.03/2017 tentang Pelaksanaan Fungsi Kepatuhan bagi Bank Umum.

Compliance Function Charter

The implementation of duties and responsibilities of Compliance Function is guided by Financial Services Authority Regulation No. 46/POJK.03/2017 on Implementation of Compliance Function of Commercial Banks.

Penanggung Jawab Fungsi Kepatuhan

Bank telah menetapkan Direktur Kepatuhan dan Manajemen Risiko serta Divisi *Compliance, System Procedure & Customer Protection* yang bertanggung jawab atas pelaksanaan fungsi kepatuhan di Bank Victoria. Pelaksanaan fungsi kepatuhan ini diawasi secara aktif oleh Dewan Komisaris. Adapun tugas dan tanggung jawab masing-masing pihak dalam menjalankan fungsi kepatuhan diuraikan sebagai berikut:

1. **Dewan Komisaris**
   a. Mengevaluasi pelaksanaan fungsi kepatuhan Bank paling sedikit 2 (dua) kali dalam setahun; dan
   b. Berdasarkan hasil evaluasi pelaksanaan fungsi kepatuhan, Dewan Komisaris menyampaikan saran-saran dalam rangka peningkatan kualitas pelaksanaan fungsi kepatuhan kepada Direktur Utama dengan tembusan kepada Direktur Kepatuhan dan Manajemen Risiko.

2. **Direktur Kepatuhan dan Manajemen Risiko**
   a. Merumuskan strategi guna mendorong terciptanya budaya kepatuhan Bank;
   b. Mengusulkan kebijakan kepatuhan atau prinsip-prinsip kepatuhan yang akan ditetapkan oleh Direksi;
   c. Menetapkan sistem dan prosedur kepatuhan yang digunakan untuk menyusun ketentuan dan pedoman internal Bank;
   d. Memastikan bahwa seluruh kebijakan, ketentuan, sistem, dan prosedur, serta kegiatan usaha yang dilakukan Bank telah sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan;
   e. Meminimalkan risiko kepatuhan Bank;

Person in Charge of the Compliance Function

The Bank has appointed the Director of Compliance, System Procedure & Customer Protection Division responsible for implementing the compliance function at Bank Victoria. The implementation of this compliance function is actively supervised by the Board of Commissioners. Duties and responsibilities of each party in performing compliance function are described as follows:

1. **Board of Commissioners**
   a. Evaluating the implementation of the Bank's compliance function at least 2 (two) times a year; and
   b. Based on the evaluation results of implementation of compliance function, the Board of Commissioners provides suggestions to improve the quality of compliance function to the President Director with a copy to the Director of Compliance and Risk Management.

2. **Director of Compliance and Risk Management**
   a. Formulating strategies to encourage the creation of the Bank's compliance culture;
   b. Proposing compliance policies or compliance principles to be specified by the Board of Directors;
   c. Establishing compliance systems and procedures to develop the Bank's internal provisions and guidelines;
   d. Ensuring that all policies, provisions, systems, and procedures and business activities conducted by the Bank are in accordance with the provisions of Financial Services Authority, and the laws and regulations;
   e. Minimizing the Bank's compliance risk;

f. Melakukan tindakan pencegahan agar kebijakan dan/atau keputusan yang diambil Direksi Bank tidak menyimpang dari ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan; dan
g. Melakukan tugas lain yang terkait dengan fungsi kepatuhan.

Terkait dengan pelaksanaan tata kelola, maka Direktur Kepatuhan dan Manajemen Risiko yang telah ditunjuk sebagai Direktur *in Charge* dapat merumuskan langkah-langkah strategis dalam mendukung dan meningkatkan efektivitas penerapan fungsi kepatuhan, penerapan manajemen risiko, serta penerapan tata kelola. Pelaporan pelaksanaan tugas dan tanggung jawab dari fungsi kepatuhan kepada regulator dilakukan oleh Direktur Kepatuhan dan Manajemen Risiko dengan tembusan kepada Dewan Komisaris paling kurang secara triwulan.

3. Divisi *Compliance, System Procedure & Customer Protection*

a. Membuat langkah untuk mendukung terciptanya budaya kepatuhan pada seluruh kegiatan usaha Bank pada setiap jenjang organisasi;
b. Melakukan identifikasi, pengukuran, pemantauan, dan pengendalian terhadap risiko kepatuhan dengan mengacu pada ketentuan Otoritas Jasa Keuangan;
c. Menilai dan mengevaluasi efektivitas, kecukupan, dan kesesuaian kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank dengan ketentuan peraturan perundang-undangan;
d. Melakukan kaji ulang dan/atau merekomendasikan untuk menginikan dan menyempurnakan kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank agar sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan;
e. Melakukan upaya untuk memastikan bahwa kebijakan, ketentuan, sistem dan prosedur, serta kegiatan usaha Bank telah sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan; dan
f. Melakukan tugas lain yang terkait dengan fungsi kepatuhan.

Divisi *Compliance, System Procedure & Customer Protection* melaporkan seluruh aktivitasnya dalam melaksanakan tugas dan tanggung jawabnya langsung kepada Direktur Kepatuhan dan Manajemen Risiko.

f. Taking precautions so that the policies and/or decisions taken by the Bank's Board of Directors do not deviate from the provisions of the Financial Services Authority and the provisions of laws and regulations; and
g. Performing other tasks associated with the compliance function.

Related to the implementation of governance, the Director of Compliance and Risk Management who are appointed as the Director in Charge can formulate strategic steps to support and improve the effectiveness of compliance function implementation, risk management implementation, and governance implementation. Reporting of the implementation of duties and responsibilities of the compliance function to the regulator is conducted by the Director of Compliance and Risk Management, with copies to the Board of Commissioners at least on a quarterly basis.

3. Compliance, System Procedure & Customer Protection Division

a. Preparing steps in order to support the creation of a compliance culture on all of the Bank's business activities at every organizational level;
b. Identifying, measuring, monitoring, and controlling the compliance risks by referring to the provisions of the Financial Services Authority;
c. Assessing and evaluating the effectiveness, adequacy, and conformity of the Bank's policies, regulations, systems, and procedures against the provisions of laws and regulations;
d. Reviewing and/or recommending updates and refinements of policies, provisions, systems, and procedures owned by the Bank to be in accordance with the provisions of the Financial Services Authority and provisions of laws and regulations;
e. Taking measures to ensure that the policies, regulations, systems, and procedures, as well as the Bank's business activities to be in accordance with the provisions of the Financial Services Authority and provisions of laws and regulations; and
f. Performing other tasks associated with the compliance function.

The Compliance, System Procedure & Customer Protection Division reports all of its activities in performing its duties and responsibilities directly the Director of Compliance and Risk Management.

Profil Kepala Divisi *Compliance, System Procedure & Customer Protection*
Profile of the Head of Compliance, System Procedure & Customer Protection Division

R.R. UTAMI TJIPTO

Kepala Divisi *Compliance, System Procedure & Customer Protection*
Head of Compliance, System Procedure & Customer Protection Division

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Jakarta

Usia / Age
62 tahun / years old

Domisili / Domicile
Jakarta

Dasar Pengangkatan dan Periode Menjabat

Keputusan Direksi No. 001/SK-DIR/HCM/06/23 tanggal 5 Juni 2023.

Riwayat Pendidikan

Sarjana Hukum dari Universitas Airlangga (1986).

Rangkap Jabatan

Di dalam Bank Victoria:
Tidak ada.

Di luar Bank Victoria:
Tidak ada.

Riwayat Jabatan

- *Recovery Litigation Group Head* dan berbagai posisi di PT Bank CIMB Niaga Tbk (2009-2010);
- *Compliance & Legal Group Head* PT Bank ICB Bumiputera Tbk (2010-2012);
- *Head of Compliance & Procedure* PT Bank QNB Indonesia Tbk (2012-2017);
- *Core Team* PT Asuransi Candi Utama establishment (2018-2019);
- *Head of Legal Compliance AML & Corporate Secretary* PT Asuransi Candi Utama (2020-2023); dan
- Kepala Divisi *Compliance & System and Procedure* Bank Victoria (2023).

Sertifikasi

- Sertifikasi *Compliance Manager* (CPM) dari Ikatan Bankir Indonesia (2016);
- Sertifikasi Asesor dari Sertifikasi Profesi Perbankan (2017);
- Sertifikasi Manajemen Risiko Jenjang 4 dari Sertifikasi Profesi Perbankan (2019);
- Sertifikasi Manajemen Risiko - *Qualified Chief Risk Officer* dari Lembaga Sertifikasi Profesi – Mitra Kalyana Sejahtera (2022); dan
- Sertifikasi Manajemen Risiko Jenjang 6 dari Lembaga Sertifikasi Profesi Perbankan (2024).

Hubungan Afiliasi

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

Basis of Appointment and Term of Office

Board of Directors' Decision No. 001/SK-DIR/HCM/06/23 dated 5 June 2023.

Education

Bachelor of Laws from Airlangga University (1986).

Concurrent Positions

In Bank Victoria:
None.

Outside of Bank Victoria:
None.

History of Positions

- Recovery Litigation Group Head and various positions at PT Bank CIMB Niaga Tbk (2009-2010);
- Compliance & Legal Group Head of PT Bank ICB Bumiputera Tbk (2010-2012);
- Head of Compliance & Procedure PT Bank QNB Indonesia Tbk (2012-2017);
- Core Team of PT Asuransi Candi Utama establishment (2018-2019);
- Head of Legal Compliance AML & Corporate Secretary PT Asuransi Candi Utama (2020-2023); and
- Head of Compliance & System and Procedure Division of Bank Victoria (2023).

Certification

- Compliance Manager Certification (CPM) from the Indonesian Bankers Association (2016);
- Assessor Certification from Certification of Banking Profession (2017);
- Level 4 Risk Management Certification from Certification of Banking Profession (2019);
- Risk Management Certification - Qualified Chief Risk Officer from Professional Certification Institute – Mitra Kalyana Sejahtera (2022); and
- Certification of Risk Management Level 6 from Banking Profession Certification Institution (2024).

Affiliation Relationship

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

Laporan Singkat Pelaksanaan Kegiatan Fungsi Kepatuhan Tahun 2024

Sepanjang tahun 2024, Fungsi Kepatuhan telah melaksanakan kegiatan sebagai bentuk pelaksanaan tugas dan tanggung jawabnya yang diuraikan sebagai berikut:

1. Menyusun dan memperbarui kebijakan serta prosedur sesuai dengan regulasi yang berlaku;
2. Memantau dan menindaklanjuti hasil pemeriksaan Otoritas Jasa Keuangan sesuai batas waktu yang ditetapkan;
3. Bertindak sebagai *liaison* Bank dengan Otoritas Jasa Keuangan;

Brief Report on Implementation of Compliance Function's Activities in 2024

Throughout 2024, the Compliance Function carried out activities as the implementation of its duties and responsibilities as described below:

1. Preparing and updating policies and procedures in accordance with applicable regulations;
2. Monitoring and following up on the results of the Financial Services Authority's audit according to the target date set;
3. Acting as the Bank liaison with the Financial Services Authority;

4. Melakukan kajian regulasi terhadap proposal kredit di atas nilai tertentu;
5. Menelaah aspek kepatuhan terhadap regulasi atas produk dan/atau aktivitas baru;
6. Menyosialisasikan peraturan terbaru dari Otoritas Jasa Keuangan, Bank Indonesia, dan regulator lainnya, serta kebijakan dan standar operasional prosedur Bank, baik secara *online* maupun *offline*;
7. Menyelenggarakan *Focus Group Discussion* (FGD) atas Peraturan Otoritas Jasa Keuangan dan/atau Bank Indonesia;
8. Menunjuk *Compliance Champion* di setiap divisi dan cabang untuk meningkatkan budaya kepatuhan di seluruh lini Bank;
9. Mengadakan pelatihan tentang Peraturan Otoritas Jasa Keuangan terkait Perlindungan Konsumen bagi fungsi kerja perlindungan konsumen, Kepala Cabang, dan Kepala Operasi Cabang;
10. Mengirimkan pengingat kepada unit kerja terkait kewajiban pelaporan bulanan, triwulan, semester, dan tahunan;
11. Mengisi topik terkait GCG dan regulasi dalam Rapat Budaya yang diselenggarakan secara berkala;
12. Melakukan kajian produk dan/atau aktivitas baru serta membuat *compliance checklist* produk dan/atau aktivitas baru; dan
13. Mengikuti pelatihan baik secara *online* maupun *offline* guna meningkatkan kompetensi di bidang kepatuhan.

4. Conducting regulatory reviews of credit proposals above a certain threshold;
5. Reviewing aspects of regulatory compliance for new products and/or activities;
6. Disseminating the latest regulations from Financial Services Authority, Bank Indonesia, and other regulators, as well as the Bank's policies and standard operating procedures, both online and offline;
7. Organizing Focus Group Discussions (FGD) on Financial Services Authority and/or Bank Indonesia Regulations;
8. Appointing Compliance Champions in each division and branch to enhance compliance culture across all lines of the Bank;
9. Conducting training on Financial Services Authority Regulations related to Consumer Protection for consumer protection work functions, Branch Managers, and Branch Operations Managers;
10. Sending reminders to work units regarding monthly, quarterly, semi-annual, and annual reporting obligations;
11. Addressing topics related to GCG in Cultural Meetings held periodically;
12. Reviewing new products and/or activities and creating compliance checklists for new products and/or activities; and
13. Participating in training sessions, both online and offline, to improve competency in compliance.

Pelatihan dan/atau Peningkatan Fungsi Kepatuhan

Sepanjang tahun 2024, Fungsi Kepatuhan telah mengikuti pelatihan dan/atau program peningkatan kompetensi, baik yang diselenggarakan secara internal maupun eksternal, sebanyak 58 kali, dengan materi yang mencakup peluang dan tantangan perlindungan data pribadi dalam transaksi di era digital, integritas pelaporan keuangan, rahasia Bank, perlindungan konsumen dan perlindungan data pribadi, *anti-fraud*, penerapan anti-pencucian uang, dan penerapan pengendalian internal dalam proses pelaporan keuangan Bank.

Compliance Function's Training and/or Development Programs

Throughout 2024, the Compliance Function attended 58 trainings and/or competency development programs, both organized internally and externally, with materials covering opportunities and challenges for personal data protection in transactions in the digital era, integrity of financial reporting, Bank secrecy, consumer protection and personal data protection, anti-fraud, implementation of anti-money laundering, and implementation of internal control in the Bank's financial reporting process.

Pengadaan Barang dan Jasa [POJK F.1]

Procurement of Goods and Services

Bank Victoria telah menyusun kebijakan pengadaan barang dan jasa sebagai panduan bagi unit kerja untuk mendukung operasional dan layanan nasabah. Bank juga dapat mengalihdayakan pekerjaan penunjang kepada penyedia jasa pihak ketiga. Proses pengadaan barang dan jasa di Bank juga dilakukan secara transparan, objektif, memperlakukan semua rekanan secara adil, serta mencegah praktik tidak etis.

Bank Victoria prepared a policy on procurement of goods and services as a guide for work units to support operations and customer services. The Bank may also outsource its supporting works to third-party service providers. The procurement process for goods and services at the Bank is also carried out transparently, objectively, and by treating all partners fairly, as well as by preventing unethical practices.

Etika Pengadaan Barang dan Jasa

Etika pelaksanaan pengadaan barang dan jasa di Bank berpedoman pada Keputusan Direksi No. 024A/SK-DIR/02/23 tanggal 24 Februari 2023 tentang Pedoman Kode Etik Perilaku Karyawan PT Bank Victoria International Tbk. Pedoman ini memastikan bahwa hubungan antara karyawan dan rekanan atau calon rekanan selama proses pengadaan barang dan/atau jasa mematuhi prinsip-prinsip berikut:

1. Tidak menerima tips atau mencari pengadaan berdasarkan keuntungan pribadi semata;
2. Transparansi;
3. Mencari penawaran terbaik;
4. Tidak terdapat *conflict of interest;* dan
5. Vendor harus mengikuti peraturan terkait pengadaan barang dan jasa yang berlaku di Bank Victoria.

Ethics of Procurement of Goods and Services

The ethics in implementing procurement of goods and services at the Bank are guided by the Board of Directors' Decision No. 024A/SK-DIR/02/23 dated 24 February 2023 on Employee's Code of Conduct of PT Bank Victoria International Tbk. This conduct ensures that the employee's relationship with partner or prospective partner during the procurement of goods and/or services complies with the following principles:

1. Do not accept tips or seek procurement based on personal interest;
2. Transparency;
3. Look for the best deals;
4. No conflict of interest; and
5. Vendors must follow the regulations regarding the procurement of goods and services applicable at Bank Victoria.

Pengadaan Barang dan Jasa Tahun 2024

Realisasi pengadaan barang dan jasa Bank selama tahun 2024 sebesar Rp79.646.957.980,- dengan kegiatan pengadaan barang dan jasa sebanyak 12 (dua belas) kegiatan.

Procurement of Goods and Services in 2024

The realization of the Bank's procurement of goods and services throughout 2024 was Rp79,646,957,980, with a total 12 (twelve) activities of procurement of goods and services.

Perkara Hukum
Legal Cases

Perkara hukum yang dihadapi selama tahun 2024 sebagai berikut:

The legal cases faced in 2024 were as follows:

Perkara Hukum Legal Cases	Perdata Civil	Pidana Criminal	Tata Usaha Negara State Administration
Bank Victoria			
Telah Selesai (Mempunyai Kekuatan Hukum yang Tetap) Settled (Final and Binding)	6	-	-
Dalam Proses Penyelesaian In Settlement Process	13	-	-
Dewan Komisaris dan Direksi Bank Victoria **Board of Commissioners and Board of Directors of Bank Victoria**			
Telah Selesai (Mempunyai Kekuatan Hukum yang Tetap) Settled (Final and Binding)	-	-	-
Dalam Proses Penyelesaian In Settlement Process	-	-	-
Total	**19**	**-**	**-**

Perkara Hukum yang Dihadapi Bank Victoria Tahun 2024
Legal Cases Faced by Bank Victoria in 2024

Pokok Perkara Case Profile	Status Penyelesaian Settlement Status	Pengaruh terhadap Perusahaan Impact on the Company	Sanksi Administrasi Administrative Sanctions
Perkara PT Iswara Dewata (Penggugat) di Pengadilan Negeri Jakarta Selatan No. 1057/Pdt.G/2024/PN Jkt.Sel Case of PT Iswara Dewata (Plaintiff) at South Jakarta District Court No. 1057/Pdt.G/2024/PN Jkt.Sel	Dalam proses di Pengadilan Negeri Jakarta Selatan In process at South Jakarta District Court	Belum ada None yet	Belum ada None yet
Perkara PT Surya Eden Utama (Pembanding) di Pengadilan Negeri Jakarta Selatan No. 1150/Pdt.G/2022/PN Jkt.Sel Case of PT Surya Eden Utama (Appellant) at South Jakarta District Court No. 1150/Pdt.G/2022/PN Jkt.Sel	Dalam proses di Pengadilan Tinggi DKI Jakarta In process at DKI Jakarta High Court	Belum ada None yet	Belum ada None yet
Perkara PT Mas Murni Indonesia Tbk (Dalam Pailit) (Penggugat) di Pengadilan Negeri Surabaya No. 222/Pdt.G/2024/PN Sby Case of PT Mas Murni Indonesia Tbk (In Bankruptcy) (Plaintiff) at Surabaya District Court No. 222/Pdt.G/2024/PN Sby	Berkekuatan Hukum Tetap Permanent Legal Force	Tidak ada None	Tidak ada None
Perkara Sucik Mardi (Penggugat) di Pengadilan Negeri Jakarta Pusat No. 525/Pdt.G/2024/PN Jkt.Pst Case of Sucik Mardi (Plaintiff) at Central Jakarta District Court No. 525/Pdt.G/2024/PN Jkt.Pst	Dalam proses di Pengadilan Negeri Jakarta Pusat In process at Central Jakarta District Court	Belum ada None yet	Belum ada None yet
Perkara Andy Hartono (Turut Termohon Kasasi) di Pengadilan Negeri Jakarta Pusat No. 566/Pdt.G/2023/PN Jkt.Pst Case of Andy Hartono (Co-Defendant for Cassation) at Central Jakarta District Court No. 566/Pdt.G/2023/PN Jkt.Pst	Dalam proses di Mahkamah Agung Republik Indonesia In process at the Supreme Court of the Republic of Indonesia	Belum ada None yet	Belum ada None yet
Perkara Firzia Resita (Pemohon Kasasi) di Pengadilan Negeri Jakarta Selatan No. 826/Pdt.G/2023/PN Jkt.Sel Case of Firzia Resita (Cassation Petitioner) at South Jakarta District Court No. 826/Pdt.G/2023/PN Jkt.Sel	Dalam proses di Mahkamah Agung Republik Indonesia In process at the Supreme Court of the Republic of Indonesia	Belum ada None yet	Belum ada None yet
Perkara Sufendi (Pemohon Kasasi) di Pengadilan Negeri Jakarta Selatan No. 1139/Pdt.G/2023/PN Jkt.Sel Case of Sufendi (Cassation Petitioner) at South Jakarta District Court No. 1139/Pdt.G/2023/PN Jkt.Sel	Dalam proses di Mahkamah Agung Republik Indonesia In process at the Supreme Court of the Republic of Indonesia	Belum ada None yet	Belum ada None yet
Perkara Siti Maryani (Tergugat) di Pengadilan Negeri Jakarta Pusat No. 46/Pdt.G/2024/PN Jkt.Pst Case of Siti Maryani (Defendant) at Central Jakarta District Court No. 46/Pdt.G/2024/PN Jkt.Pst	Berkekuatan Hukum Tetap Permanent Legal Force	Tidak ada None	Tidak ada None
Perkara PT Papan Utama Indonesia (Terbanding) di Pengadilan Tata Usaha Negara Jakarta No. 143/G/2024/PTUN Jkt Case of PT Papan Utama Indonesia (Appellee) at the Jakarta State Administrative Court No. 143/G/2024/PTUN Jkt	Dalam proses di Pengadilan Tinggi Tata Usaha Negara Jakarta In process at Jakarta High Administrative Court	Belum ada None yet	Belum ada None yet
Perkara Christofer Talaska (Tergugat) di Pengadilan Negeri Jakarta Barat No. 840/Pdt.G/2024/PN Jkt.Brt Case of Christofer Talaska (Defendant) at West Jakarta District Court No. 840/Pdt.G/2024/PN Jkt.Brt	Dalam proses di Pengadilan Negeri Jakarta Barat In process at West Jakarta District Court	Belum ada None yet	Belum ada None yet
Perkara PT Inter Medika Utama (Tergugat) di Pengadilan Negeri Jakarta Pusat No. 824/Pdt.G/2023/PN Jkt.Pst Case of PT Inter Medika Utama (Defendant) at Central Jakarta District Court No. 824/Pdt.G/2023/PN Jkt.Pst	Berkekuatan Hukum Tetap Permanent Legal Force	Tidak ada None	Tidak ada None
Perkara Yayasan Pendidikan Kader Keuangan dan Perbankan Bandung (YPKKPB) (Penggugat) di Pengadilan Negeri Jakarta Pusat No. 434/Pdt.G/2022/PN Jkt.Pst Case of Bandung Financial and Banking Cadre Education Foundation (YPKKPB) (Plaintiff) at Central Jakarta District Court No. 434/Pdt.G/2022/PN Jkt.Pst	Dalam proses di Mahkamah Agung Republik Indonesia In process at the Supreme Court of the Republic of Indonesia	Belum ada None yet	Belum ada None yet

Pokok Perkara Case Profile	Status Penyelesaian Settlement Status	Pengaruh terhadap Perusahaan Impact on the Company	Sanksi Administrasi Administrative Sanctions
Perkara PT Karya Technik Multifinance (Tergugat) di Pengadilan Negeri Jakarta Barat No. 202/Pdt.Bth/2024/PN Jkt.Brt Case of PT Karya Technik Multifinance (Defendant) at West Jakarta District Court No. 202/Pdt.Bth/2024/PN Jkt.Brt	Dalam proses di Pengadilan Negeri Jakarta Barat In process at West Jakarta District Court	Belum ada None yet	Belum ada None yet
Perkara Susanto (Penggugat) di Pengadilan Negeri Surabaya No. 1164/Pdt.G/2023/PN Sby Case of Susanto (Plaintiff) at Surabaya District Court No. 1164/Pdt.G/2023/PN Sby	Dalam proses di Mahkamah Agung Republik Indonesia In process at the Supreme Court of the Republic of Indonesia	Belum ada None yet	Belum ada None yet
Perkara PT Kebun Indah Selaras (Penggugat) di Pengadilan Negeri Jakarta Selatan No. 839/Pdt.G/2024/PN Jkt.Sel Case of PT Kebun Indah Selaras (Plaintiff) at South Jakarta District Court No. 839/Pdt.G/2024/PN Jkt.Sel	Dalam proses di Pengadilan Negeri Jakarta Selatan In process at South Jakarta District Court	Belum ada None yet	Belum ada None yet
Perkara PT Mas Murni Indonesia Tbk (Dalam Pailit) di Pengadilan Negeri Surabaya No. 495/Pdt.Bth/2024/PN Sby Case of PT Mas Murni Indonesia Tbk (In Bankruptcy) at Surabaya District Court No. 495/Pdt.Bth/2024/PN Sby	Berkekuatan Hukum Tetap Permanent Legal Force	Tidak ada None	Tidak ada None
Perkara PT Mas Murni Indonesia Tbk (Dalam Pailit) di Pengadilan Negeri Surabaya No. 493/Pdt.Bth/2024/PN Sby Case of PT Mas Murni Indonesia Tbk (In Bankruptcy) at Surabaya District Court No. 493/Pdt.Bth/2024/PN Sby	Berkekuatan Hukum Tetap Permanent Legal Force	Tidak ada None	Tidak ada None
Perkara PT Tata Pesona Indonesia dan Firman Handoko (Tergugat) di Pengadilan Negeri Denpasar No. 1074/Pdt.Bth/2024/PN Dps Case of PT Tata Pesona Indonesia and Firman Handoko (Defendants) at Denpasar District Court No. 1074/Pdt.Bth/2024/PN Dps	Dalam proses di Pengadilan Negeri Denpasar In process at Denpasar District Court	Belum ada None yet	Belum ada None yet
Perkara PT Tata Pesona Indonesia dan Firman Handoko (Tergugat) di Pengadilan Negeri Denpasar No. 954/Pdt.G/2023/PN Dps Case of PT Tata Pesona Indonesia and Firman Handoko (Defendants) at Denpasar District Court No. 954/Pdt.G/2023/PN Dps	Berkekuatan Hukum Tetap Permanent Legal Force	Tidak ada None	Tidak ada None

Sanksi Administratif Tahun 2024
Administrative Sanctions in 2024

Sepanjang tahun 2024, Dewan Komisaris dan Direksi yang sedang menjabat tidak menerima sanksi administratif dalam bentuk apa pun. Namun, Bank Victoria menerima sanksi finansial dari Bank Indonesia, Otoritas Jasa Keuangan, dan Bursa Efek Indonesia dengan total sebesar Rp29.969.000,-.

Throughout 2024, the current Board of Commissioners and Board of Directors did not receive any administrative sanctions. However, Bank Victoria received financial sanctions from Bank Indonesia, the Financial Services Authority, and Indonesia Stock Exchange totaling Rp29,969,000.

Program Anti-Pencucian Uang, Pencegahan Pendanaan Terorisme, dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal [POJK F.1]

Anti-Money Laundering, Counter-Terrorist Financing, and Counter-Proliferation Financing of Weapons of Mass Destruction Program

Penerapan program Anti-Pencucian Uang, Pencegahan Pendanaan Terorisme, dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal (APU, PPT, dan PPPSPM) merupakan kewajiban bagi seluruh pihak untuk menjalankannya, terutama bagi Bank sebagai penyedia jasa keuangan. Hal ini menjadi wajib dilakukan oleh Bank mengingat modus yang dilakukan pelaku semakin variatif dalam memanfaatkan Bank sebagai sarana Tindak Pidana Pencucian Uang (TPPU), Tindak Pidana Pendanaan Terorisme (TPPT) dan Pendanaan Proliferasi Senjata Pemusnah Massal (PPSPM). Bank telah menjalankan program APU, PPT, dan PPPSPM melalui pendekatan berbasis risiko serta melakukan pelaporan kepada Pusat Pelaporan dan Analisis Transaksi Keuangan (PPATK) sebagai *Financial Intelligence Unit* (FIU).

Langkah yang diambil Bank dalam menjalankan program APU, PPT, dan PPPSPM diuraikan sebagai berikut:

1. Pengawasan Aktif Direksi dan Dewan Komisaris terhadap Program APU, PPT, dan PPPSPM Direksi Bank memastikan efektivitas penerapan Prinsip APU, PPT, dan PPPSPM melalui:

    a. Mengusulkan kebijakan dan prosedur tertulis mengenai penerapan program APU, PPT, dan PPPSPM kepada Dewan Komisaris;
    b. Memastikan penerapan program APU, PPT, dan PPPSPM dilaksanakan sesuai dengan kebijakan dan prosedur tertulis yang telah ditetapkan;
    c. Membentuk unit kerja khusus dan/atau menunjuk pejabat yang bertanggung jawab terhadap penerapan program APU, PPT, dan PPPSPM;
    d. Melakukan pengawasan atas kepatuhan unit kerja dalam menerapkan program APU, PPT, dan PPPSPM;
    e. Memastikan bahwa kebijakan dan prosedur tertulis mengenai penerapan program APU, PPT, dan PPPSPM sejalan dengan perubahan dan pengembangan produk, jasa, dan teknologi di sektor jasa keuangan serta sesuai dengan perkembangan modus TPPU, TPPT, dan/atau PPSPM;

The implementation of Anti-Money Laundering, Counter-Terrorist Financing, and Counter-Proliferation Financing of Weapons of Mass Destruction (AML, CTF, and CPF) programs is an obligation for all parties to carry out, particularly for the Bank as a financial service provider. This is mandatory for the Bank due to the increasingly varied modes used by perpetrators in utilizing the Bank as a means of Money Laundering (TPPU), Terrorist Financing (TPPT), and Proliferation of Weapons of Mass Destruction Financing (PPSPM). The Bank has implemented AML, CTF, and CPF programs through risk-based approach and has reported to the Financial Transaction Reports and Analysis Center (PPATK) as the Financial Intelligence Unit (FIU).

Measures taken by the Bank in implementing AML, CTF, and CPF programs are described as follows:

1. Active Supervision by the Board of Directors and the Board of Commissioners of the AML, CTF, and CPF programs. The Bank's Board of Directors ensures the effective implementation of the AML, CTF, and CPF principles through the following measures:
    a. Proposing written policies and procedures for the implementation of the AML, CTF, and CPF programs to the Board of Commissioners;
    b. Ensuring that the implementation of the AML, CTF, and CPF programs is carried out in accordance with the established written policies and procedures;
    c. Establishing a specialized work unit and/or appointing officials in charge of the implementation of the AML, CTF, and CPF programs;
    d. Supervising the compliance of work units in implementing the AML, CTF, and CPF programs;
    e. Ensuring that the written policies and procedures for the implementation of the AML, CTF, and CPF programs align with changes and developments in products, services, and technology in the financial services sector, as well as with the evolving modes of TPPU, TPPT, and/or PPSPM;

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

Dewan Komisaris bertanggung jawab untuk:
a. Memastikan Bank memiliki kebijakan dan prosedur penerapan program APU, PPT, dan PPPSPM;
b. Memberikan persetujuan atas kebijakan dan prosedur penerapan program APU, PPT, dan PPPSPM yang diusulkan oleh Direksi;
c. Melakukan evaluasi atas kebijakan dan prosedur Penerapan Program APU, PPT, dan PPPSPM;
d. Melakukan pengawasan atas pelaksanaan tanggung jawab Direksi terhadap penerapan program APU, PPT, dan PPPSPM; dan
e. Memastikan adanya pembahasan terkait penerapan program APU, PPT, dan PPPSPM dalam rapat Direksi dan Dewan Komisaris.

2. Kebijakan dan prosedur penerapan program APU, PPT, dan PPPSPM
Bank telah memiliki kebijakan dan prosedur yang sejalan dan sesuai dengan peraturan perundang-undangan dan *best practices*, antara lain mencakup:
a. Uji tuntas nasabah/*Customer Due Diligence* (CDD) dan/atau uji lanjut nasabah/*Enhance Due Diligence* (EDD) terhadap calon nasabah, nasabah, *conductor* dan *Walk in Customer* (WIC), *Beneficial Owner* (BO), dan *Politically Exposed Person* (PEP);
b. Penghentian sementara transaksi dan penundaan transaksi;
c. Penolakan transaksi dan penutupan hubungan usaha;
d. Pengelolaan risiko pencucian uang dan/atau pendanaan terorisme berdasarkan pendekatan berbasis risiko (*risk-based approach*) terkait nasabah, negara/area geografis, produk, jasa dan transaksi, serta jaringan distribusi (*delivery channels*);
e. Pemantauan dan penginian;
f. *Cross border correspondent banking*;
g. Transfer dana;
h. Penatausahaan dokumen; dan
i. Pelaporan dan sanksi.

3. Pengendalian internal yang efektif dalam penerapan APU, PPT, dan PPPSPM, antara lain dilakukan dengan:
a. Memiliki kebijakan dan prosedur APU, PPT, dan PPPSPM serta pemantauan internal yang tepat;

f. Ensuring that officials and/or employees, especially those from relevant work units and new employees, have attended training related to the implementation of the AML, CTF, and CPF programs at least once a year; and
g. Ensuring that discussions related to the implementation of the AML, CTF, and CPF programs are included in the Board of Directors' meetings.

The Board of Commissioners is responsible for:
a. Ensuring that the Bank has policies and procedures for implementing AML, CTF, and CPF programs;
b. Approving the policies and procedures for implementing the AML, CTF, and CPF programs proposed by the Board of Directors;
c. Evaluating the policies and procedures for implementing the AML, CTF, and CPF programs;
d. Supervising the execution of the Board of Directors' responsibilities regarding the implementation of the AML, CTF, and CPF programs; and
e. Ensuring that discussions related to the implementation of the AML, CTF, and CPF programs are included in the Board of Directors and Board of Commissioners meetings.

2. Policies and procedures for the implementation of AML, CTF, and CPF programs
The Bank has established policies and procedures that align with laws and regulations and best practices, which include:
a. Customer Due Diligence (CDD) and/or Enhanced Due Diligence (EDD) for prospective customers, customers, conductors and Walk-in Customers (WIC), Beneficial Owner (BO), and Politically Exposed Persons (PEP);
b. Temporary Suspension and delay of transactions;
c. Rejection of transactions and termination of business relationships;
d. Management of money laundering and/or terrorist financing risks based on a risk-based approach concerning customers, geographical areas/countries, products, services and transactions, as well as delivery channels;
e. Monitoring and updating;
f. Cross-border correspondent banking;
g. Fund transfers;
h. Document administration; and
i. Reporting and sanctions.

3. Effective internal control in the implementation of AML, CTF, and CPF programs is achieved through the following measures:
a. Establishing appropriate AML, CTF, and CPF policies and procedures, as well as proper internal monitoring;

b. Adanya batasan wewenang dan tanggung jawab yang jelas terhadap satuan kerja terkait dengan penerapan program APU, PPT, dan PPPSPM, baik melalui *first line of defense*, *second line of defense*, maupun *third line of defense*; dan
c. Melakukan pemeriksaan untuk memastikan efektivitas pelaksanaan program APU, PPT, dan PPPSPM oleh SKAI.

4. Sistem informasi manajemen
   Untuk mengoptimalkan pemantauan transaksi dalam pelaksanaan program APU, PPT, dan PPPSPM, Bank secara berkelanjutan mengembangkan teknologi sistem informasi, antara lain:
   a. Melakukan penyempurnaan sistem dan aplikasi pendukung untuk Laporan Transaksi Keuangan Tunai, Laporan Transfer Dana dari dan ke Luar Negeri, Laporan Transaksi Keuangan Mencurigakan, *Filtering and Screening Terrorist (DTTOT List), PEP Screening Detection dan Customer Due Diligence (CDD) Risk Scoring* dalam suatu sistem yaitu SmartAML. SmartAML digunakan untuk mendukung pelaksanaan *know your customer* yang lebih optimal, khususnya dalam pendeteksian/pemantauan transaksi nasabah yang memiliki pola perilaku dan pola transaksi pencucian uang dan pendanaan terorisme, serta pendanaan proliferasi senjata pemusnah massal;
   b. Mengembangkan aplikasi Sistem Terduga Pendanaan Terorisme (SIPENDAR) PPATK; dan
   c. Mengembangkan aplikasi Sistem Informasi Pengguna Jasa Terpadu (SIPESAT) PPATK.

5. Sumber daya manusia dan pelatihan
   Bank menyelenggarakan program pelatihan yang berkesinambungan dan berkala paling sedikit 1 (satu) kali dalam 1 (satu) tahun untuk memastikan sumber daya manusia memiliki pengetahuan yang memadai, terutama terkait APU, PPT, dan PPPSPM. Pelatihan mencakup penerapan peraturan perundang-undangan terkait, tipologi pencucian uang dan pendanaan terorisme, serta kebijakan dan prosedur internal program APU, PPT, dan PPPSPM beserta peran serta tanggung jawab karyawan dalam pencegahan pencucian uang, pendanaan terorisme, dan pendanaan proliferasi senjata pemusnah massal.

Pada tahun 2024, Bank melakukan penguatan program APU, PPT, dan PPPSPM untuk memitigasi risiko terjadinya TPPU, TPPT, dan TPPPSPM melalui peningkatan kompetensi sumber daya manusia dan pelatihan serta *forum group discussion*. Selain itu, keandalan sistem pendukung penerapan program APU, PPT, dan PPPSPM dilakukan melalui sistem SmartAML. Bank juga terus melakukan *enhancement* sistem melalui adopsi teknologi baru yang fleksibel dan sejalan dengan aktivitas transaksi keuangan digital dan perkembangan Bank terkini.

b. Establishing clear limitations of authority and responsibility for the work units involved in the implementation of the AML, CTF, and CPF programs, whether through the first line of defense, second line of defense, or third line of defense; and
c. Conducting audits to ensure the effective implementation of the AML, CTF, and CPF programs. The audits are conducted by SKAI.

4. Management information system
   To optimize transaction monitoring in the implementation of AML, CTF, and CPF programs, the Bank is continuously developing its information system technology by, among others:

   a. Refining the system and supporting applications for Cash Financial Transaction Reports, International Fund Transfer Reports, Suspicious Financial Transaction Reports, Filtering and Screening Terrorist (DTTOT List), PEP Screening Detection, and Customer Due Diligence (CDD) Risk Scoring within a system called SmartAML. SmartAML is used to support the optimal implementation of the "know your customer" process, particularly in detecting/monitoring customer transactions that exhibit patterns of money laundering, terrorist financing, and proliferation of weapons of mass destruction financing behavior;

   b. Developing PPATK's Suspected Terrorism Financing Information System (SIPENDAR) application; and
   c. Developing PPATK's Integrated Service User Information System (SIPESAT) application.

5. Human resources and training
   The Bank organizes regular and continuous training programs at least once a year to ensure that its human resources are adequately knowledgeable, especially in relation to AML, CTF, and CPF. The training covers the application of relevant laws and regulations, typologies of money laundering and terrorist financing, as well as internal policies and procedures of the AML, CTF, and CPF programs, along with the roles and responsibilities of employees in preventing money laundering, terrorist financing, and financing the proliferation of weapons of mass destruction.

In 2024, the Bank strengthened the AML, CTF, and CPF programs to mitigate the risk of TPPU, TPPT, and TPPPSPM by enhancing the competence of human resources, conducting training, and organizing group discussion forums. Furthermore, the reliability of the system supporting the implementation of the AML, CTF, and CPF programs was ensured through the SmartAML system. The Bank also continuously enhances the system by adopting new, flexible technology that aligns with digital financial transaction activities and the latest developments in the Bank.

Financial Integrity Rating on Money Laundering/Terrorism Financing

Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF) merupakan penilaian terhadap integritas dan efektivitas pihak pelapor dalam menjalankan program APU dan PPT, khususnya dari aspek kinerja pelaporan APU, PPT, dan PPPSPM. Pengukuran nilai FIR on ML/TF dilakukan terhadap 3 (tiga) dimensi, yaitu:

1. Dimensi 1 (satu) untuk mengukur tingkat komitmen pihak pelapor dalam mendukung PPATK dan aparat penegak hukum dalam penelusuran transaksi keuangan terkait indikasi TPPU dan TPPT;
2. Dimensi 2 (dua) untuk mengukur tingkat implementasi tata kelola pelaporan APU dan PPT yang dilakukan oleh pihak pelapor sesuai dengan ketentuan Lembaga Pengawas dan Pengatur (LPP) dan pedoman pelaporan dari PPATK; dan
3. Dimensi 3 (tiga) untuk mengukur tingkat kepatuhan pihak pelapor terhadap kewajiban pelaporan APU dan PPT kepada PPATK serta kualitas formal dan material atas keseluruhan laporan yang telah disampaikan sesuai dengan peraturan PPATK.

Hasil FIR on ML/TF menjadi tolok ukur bagi PPATK dan LPP dalam merumuskan langkah-langkah pembinaan, pengawasan, dan pengaturan berbasis risiko, khususnya untuk penguatan sistem APU dan PPT di setiap pihak pelapor dan penguatan integritas sistem keuangan secara nasional.

Nilai FIR on ML/TF yang diperoleh Bank Victoria pada tahun 2024 sebesar 8,89 yang dikontribusikan oleh dimensi 1 (satu) sebesar 9,73, dimensi 2 (dua) sebesar 8,89, dan dimensi 3 (tiga) sebesar 8,54. Hal ini menunjukkan bahwa tingkat komitmen Bank Victoria dalam mendukung PPATK dan aparat penegak hukum untuk melakukan penelusuran transaksi keuangan terkait indikasi TPPU dan TPPT, tingkat implementasi tata kelola pelaporan APU dan PPT sesuai ketentuan LPP dan pedoman pelaporan PPATK, tingkat kepatuhan terhadap kewajiban pelaporan APU dan PPT kepada PPATK, serta kualitas laporan yang disampaikan masuk pada kategori Sangat Baik.

Financial Integrity Rating on Money Laundering/Terrorist Financing

The Financial Integrity Rating on Money Laundering and Terrorist Financing (FIR on ML/TF) is an assessment of the integrity and effectiveness of the reporting party in implementing AML and CTF programs, particularly from the aspect of AML, CTF, and CPF reporting performance. The FIR on ML/TF value is measured across 3 (three) dimensions:

1. Dimension 1 (one) measures the commitment level of the reporting party in supporting PPATK and law enforcement agencies in tracing financial transactions related to indications of TPPU and TPPT;
2. Dimension 2 (two) measures the level of implementation of AML and CTF reporting governance carried out by the reporting party in accordance with the provisions of the Supervisory and Regulatory Bodies (LPP) and PPATK reporting guidelines; and
3. Dimension 3 (three) measures the compliance level of the reporting party with the obligation to report AML and CTF to PPATK and the formal and material quality of the overall reports submitted in accordance with PPATK regulations.

The FIR on ML/TF results serves as a benchmark for PPATK and LPP in formulating risk-based development, supervision, and regulation measures, especially for strengthening the AML and CTF systems in each reporting party and strengthening the integrity of the national financial system.

In 2024, Bank Victoria obtained FIR on ML/TF value of 8.89, contributed by dimension 1 (one) at 9.73, dimension 2 (two) at 8.89, and dimension 3 (three) at 8.54. This achievement indicates that Bank Victoria's commitment level in supporting PPATK and law enforcement agencies to trace financial transactions related to TPPU and TPPT indications, the level of implementation of AML and CTF reporting governance in accordance with LPP provisions and PPATK reporting guidelines, the compliance level with the obligation to report AML and CTF to PPATK, and the quality of the reports submitted are in the Very Good category.

Pemberian Dana Kegiatan Politik [POJK F.1]

Provision of Funds for Political Activities

Bank berkomitmen untuk tidak memberikan dana kepada kegiatan politik, sebagaimana diatur dalam Kode Etik. Meskipun demikian, karyawan tetap diberikan kebebasan untuk menyalurkan aspirasi politiknya dengan batasan-batasan tertentu guna mencegah benturan kepentingan. Kebijakan ini bertujuan menjaga independensi dan profesionalisme Bank serta seluruh karyawan.

The Bank is committed not to providing funds for political activities, as stipulated in the Code of Conduct. Nevertheless, employees are still given the freedom to channel their political aspirations with certain limitations to prevent conflicts of interest. This policy aims to maintain the independence and professionalism of the Bank and all of its employees.

Persaingan Usaha yang Sehat [POJK F.1]

Fair Business Competition

Dalam kegiatan operasional, Bank Victoria menjunjung tinggi nilai-nilai etika dan moral, terutama dalam menjaga persaingan usaha yang sehat. Bank memastikan kepatuhan terhadap Undang-Undang Anti-Monopoli, melakukan riset pasar untuk memahami posisi kompetitor, dan berfokus pada peningkatan kualitas produk dan layanan. Selain itu, Bank melindungi kepentingan nasabah dari praktik bisnis yang tidak adil. Dalam hal Hak Kekayaan Intelektual (HAKI), Bank mendorong seluruh jajaran manajemen dan karyawan untuk menghargai karya pihak lain, berkontribusi aktif dalam pengembangan produk dan proses Bank, serta melindungi HAKI milik Bank.

In its operational activities, Bank Victoria upholds ethical and moral values, particularly in maintaining healthy business competition. The Bank ensures its compliance with Anti-Monopoly Law, conducts market research to understand competitors' position, and focuses on improving quality products and services. In addition, the Bank protects customer interests from unfair business practices. In terms of Intellectual Property Rights (IPR), the Bank encourages all levels of management and employees to respect the work of other parties, actively gives contribution to the development of the Bank's products and processes, and protects the Bank's IPR.

Kode Etik [POJK F.1] [G-07]

Code of Conduct

Bank senantiasa menjunjung tinggi integritas dengan memiliki dan menjalankan pedoman tata cara perilaku yaitu Kode Etik yang ditetapkan melalui Keputusan Direksi No. 024A/SK-DIR/02/23 tanggal 24 Februari 2023. Kode Etik menjadi dasar sikap dan tindakan karyawan agar bekerja secara profesional dan beretika dengan menggunakan prinsip- prinsip dasar yang mengacu kepada Visi, Misi, dan Nilai-Nilai Bank serta regulasi internal dan eksternal yang berlaku.

The Bank consistently upholds its integrity by having and implementing behavioral guidelines, namely the Code of Conduct, stipulated through the Board of Directors' Decision No. 024A/SK-DIR/02/23 dated 24 February 2023. The Code of Conduct serves as the basis for employees' attitudes and actions to work professionally and ethically by using basic principles that refer to the Bank's Vision, Mission, and Values, as well as applicable internal and external regulations.

Pokok Isi Kode Etik

Kode Etik Bank Victoria memuat pokok-pokok etika sebagai berikut:

1. Standar Etika Bisnis
   a. Etika Bank dengan karyawan;
   b. Etika Bank dengan nasabah;
   c. Etika Bank dengan penyedia barang dan jasa (evaluasi yang objektif dalam pengadaan perlengkapan dan peralatan Bank);
   d. Etika Bank dengan pesaing;
   e. Etika Bank dengan pemerintah;
   f. Etika Bank dengan masyarakat;
   g. Etika Bank dengan media massa; dan
   h. Etika Bank dengan organisasi profesi.
2. Standar Perilaku Karyawan
   a. Tuntunan perilaku karyawan;
   b. Penanganan benturan kepentingan;
   c. Pedoman pemberian dan penerimaan hadiah dan donasi;
   d. Pedoman kepatuhan terhadap peraturan;

Principles of Code of Conduct

The Code of Conduct of Bank Victoria sets out ethical principles as follows:

1. Standard Business Ethics
   a. Bank's Ethics with employees;
   b. Bank's Ethics with customers;
   c. Bank's Ethics with provider of goods and services (objective evaluation in the procurement of the Bank's equipment and tools);
   d. Bank's Ethics with competitors;
   e. Bank's Ethics with the government;
   f. Bank's Ethics with the communities;
   g. Bank's Ethics with mass media; and
   h. Bank's Ethics with professional organizations.
2. Standard Code of Conduct
   a. Employee behavior guidelines;
   b. Management of conflict of interest;
   c. Guidelines for giving and receiving gifts and donations;
   d. Regulatory compliance guidelines;

e. Pedoman menjaga kerahasiaan data dan informasi perusahaan;
f. Pedoman aktivitas politik; dan
g. Pedoman pelaporan atas pelanggaran dan perlindungan pelapor.

Komitmen Kepatuhan Terhadap Kode Etik

Kode Etik Bank berlaku bagi seluruh karyawan Bank termasuk Dewan Komisaris, Direksi, dan Pejabat Eksekutif. Seluruh karyawan diwajibkan untuk mempelajari dan memahami dengan sungguh-sungguh isi Kode Etik serta menandatangani Surat Pernyataan yang dimuat pada halaman akhir Kode Etik.

Penyebarluasan dan Sosialisasi Kode Etik

Bank terus berupaya untuk menyebarluaskan dan menyosialisasikan Kode Etik kepada seluruh karyawan melalui berbagai metode. Pertama, Kode Etik disampaikan kepada karyawan melalui media internal yang dapat diakses kapan saja, sehingga karyawan dapat merujuknya setiap saat. Kedua, Bank secara berkala menyampaikan etika bisnis melalui memo atau surat yang diterbitkan oleh Direksi atau Divisi terkait. Ketiga, setiap karyawan menerima buku saku Kode Etik yang harus dipelajari dan diterapkan dalam keseharian. Terakhir, penerapan Kode Etik terus diingatkan melalui pelatihan, induksi bagi karyawan baru, serta forum pelatihan yang melibatkan pihak eksternal.

Upaya Penerapan dan Penegakan Kode Etik

Penerapan dan Penegakan secara Organisasi

1. Dewan Komisaris dibantu oleh Komite Remunerasi dan Nominasi bertanggung jawab atas dipatuhinya Kode Etik di lingkungan Bank;
2. Direksi dibantu oleh Divisi *Human Capital Management & General Affair* bertanggung jawab atas penerapan Kode Etik di lingkungan Bank;
3. Kepala Divisi, Manajer, dan setingkat Manajer bertanggung jawab atas penerapan Kode Etik di lingkungan Divisi/Unit Kerja masing-masing;
4. Direksi menunjuk Kepala Divisi *Human Capital Management & General Affair* beserta jajarannya yang bertanggung jawab untuk melaporkan pelanggaran terhadap pelaksanaan Kode Etik; dan
5. Setiap karyawan wajib membaca Kode Etik melalui intranet dan menandatangani formulir pernyataan bahwa yang bersangkutan telah membaca, memahami, dan setuju untuk mematuhi Kode Etik yang didokumentasikan oleh Divisi *Human Capital Management & General Affair.*

e. Guidelines for maintaining confidentiality of company data and information;
f. Political activity guidelines; and
g. Guidelines for reporting violations and protection of whistleblower.

Commitment to Complying with Code of Conduct

The Bank's Code of Conduct is applied to all Bank employees, including the Board of Commissioners, Board of Directors, and Executive Officers. All employees are required to study and seriously understand the contents of the Code of Conduct and sign a Statement Letter set out in the final page of the Code of Conduct.

Circulation and Dissemination of Code of Conduct

The Bank strives to circulate and disseminate the Code of Conduct to all employees through various methods. First, the Code of Conduct is delivered to employees through internal media accessible at any time, so that employees can refer to it at any time. Second, the Bank periodically delivers business ethics through memos or letters issued by the Board of Directors or related Divisions. Third, each employee receives the Code of Conduct pocket book that must be studied and applied in daily life. Finally, the implementation of the Code of Conduct is continuously reminded through training, induction for new employees, and training forums involving external parties.

Efforts to Implement and Enforce Code of Conduct

Organizational Implementation and Enforcement

1. The Board of Commissioners, supported by the Remuneration and Nomination Committee, is responsible for the compliance of the Code of Conduct within the Bank;
2. The Board of Directors, assisted by the Human Capital Management & General Affair Division, is responsible for the implementation of Code of Conduct within the Bank;
3. The Head of Division, Manager, and managerial levels are responsible for the implementation of Code of Conduct in their respective Division/Unit;
4. The Board of Directors appoints Head of Human Capital Management & General Affair Division including its personnel to be the whistleblower in any violation against the Code of Conduct; and
5. It is mandatory for each and every employee to read the Code of Conduct through intranet and sign the statement letter to declare that the respective person has read, understood, and agreed to comply with the Code of Conduct, which thereafter documented by the Human Capital Management & General Affair Division.

Penegakan Pedoman Kode Etik

1. Setiap karyawan Bank harus melaporkan setiap fakta penyimpangan Pedoman Kode Etik Perilaku Karyawan kepada Divisi *Human Capital Management & General Affair* dan identitas pelapor akan dilindungi;
2. Divisi *Human Capital Management & General Affair* menindaklanjuti setiap laporan dan menyampaikan hasil kajiannya kepada Direksi dan/atau Dewan Komisaris sesuai dengan lingkup tanggung jawabnya. Penanganan tindakan penyimpangan terhadap Pedoman Kode Etik Perilaku Karyawan dilakukan melalui penyelidikan yang mendalam dan didasari fakta-fakta yang dapat dipertanggungjawabkan;
3. Direksi dan Dewan Komisaris memutuskan tindakan pembinaan, sanksi disiplin dan/atau tindakan perbaikan serta pencegahan yang harus dilaksanakan oleh atasan langsung di lingkungan masing-masing;
4. Pemberian sanksi bagi pelaku penyimpangan Pedoman Kode Etik Perilaku Karyawan; dan
5. Bank memiliki pertimbangan dan hak apabila karyawan melanggar Kode Etik/Peraturan Perusahaan/sistem prosedur dengan memberikan langsung surat peringatan ketiga kepada karyawan yang dinilai melakukan penyimpangan berat tanpa perlu surat peringatan pertama dan surat peringatan kedua.

Enforcement of Code of Conduct

1. Each of the Bank's employee must report each fact of violation against Employee's Code of Conduct to the Human Capital Management & General Affair Division and the identity of the whistleblower will be protected;
2. Human Capital Management & General Affair Division will follow up each report to and submit the assessment result to the Board of Directors and/or Board of Commissioners according to the scope of responsibility. Such violation against Employee's Code of Conduct will be handled by indepth investigation based on accountable facts;
3. The Board of Directors and Board of Commissioners will decide on a directional action, disciplinary sanction and/or correctional action and to come up with prevention to be implemented by the direct supervisor in the respective scope;
4. The imposition of sanction for the party violating the Employee's Code of Conduct; and
5. The Bank maintains its discretion and right, in the event an employee violates the Code of Conduct/Company Regulations/procedures, by directly giving third warning letter to the relevant employee who is deemed of conducting serious violation without first giving first and second warning letter.

Bentuk Pelanggaran dan Jenis Sanksi

Pelanggaran atau ketidakpatuhan terhadap Kode Etik akan dikenakan sanksi yang disesuaikan dengan tingkat pelanggarannya. Setiap sanksi akan dipertimbangkan berdasarkan jenis dan keseriusan pelanggaran, serta evaluasi terhadap individu yang melanggar. Untuk pelanggaran ringan, sanksi dapat dimulai dari teguran lisan hingga surat peringatan pertama pada pelanggaran pertama. Jika pelanggaran berlanjut, sanksi dapat ditingkatkan hingga surat peringatan ketiga, dan dalam kasus pelanggaran berulang yang serius, bahkan dapat berujung pada pengunduran diri.

Pada pelanggaran sedang, sanksi dimulai dari surat peringatan pertama, dengan kemungkinan peningkatan hingga surat peringatan kedua. Jika pelanggaran kembali terjadi, sanksi maksimal yang dapat diberikan adalah pengunduran diri. Sementara itu, pelanggaran berat memiliki konsekuensi yang lebih serius. Pada pelanggaran pertama, sanksi yang diberikan bisa berupa penghentian kenaikan gaji, hingga tindakan tegas berupa pengunduran diri.

Setiap sanksi yang diberikan kepada karyawan disesuaikan dengan aturan kepegawaian yang berlaku. Untuk Dewan Komisaris dan Direksi, pemberian sanksi mengacu pada ketentuan dalam Anggaran Dasar Bank serta keputusan RUPS.

Forms and Types of Sanction

Violation or non-compliance with the Code of Conduct will be subject to sanctions adjusted to the violation level. Each sanction will be considered based on the type and seriousness of violation, as well as evaluation of the individual committed the violation. For minor violation, sanction can start from a verbal warning to first warning letter for the first violation. If the violation continues, sanction can be increased to third warning letter, and in case of serious repeated violation, it can even lead to resignation.

For moderate violation, sanction starts from first warning letter, with the possibility of increasing to second warning letter. If the violation occurs again, the maximum sanction to be given is resignation. Meanwhile, severe violation has more serious consequences. For first violation, the sanction imposed can be in form of suspending salary increase, to strict action in form of resignation.

Every sanction imposed to employee is adjusted to the applicable personnel regulations. For the Board of Commissioners and Board of Directors, the imposition of sanctions refers to the provisions in the Bank's Articles of Association and the resolutions of GMS.

Laporan Penyimpangan Internal Tahun 2024
Internal Deviation Report in 2024

Bentuk Pelanggaran Forms Violation	Surat Peringatan Warning Letter	Surat Teguran Reprimand Letter
Ringan Minor	16	23
Sedang Moderate	2	-
Berat Severe	-	-
Total	**18**	**23**

Trend Kualitas Penerapan Kode Etik

Pada tahun 2024, kualitas penerapan Kode Etik berjalan dengan baik serta karyawan Bank mematuhi seluruh peraturan yang tercantum dalam Kode Etik.

Trend on Quality of Code of Conduct Implementation

In 2024, the quality of Code of Conduct implementation ran properly and the Bank's employees complied with all regulations stated in the Code of Conduct.

Program Kepemilikan Saham oleh Manajemen dan Karyawan
Management/Employee Stock Ownership Program

Hingga tahun 2024, Bank belum melaksanakan program kepemilikan saham oleh manajemen (MSOP) dan/atau program kepemilikan saham oleh karyawan (ESOP).

Until 2024, the Bank did not conduct management stock ownership program (MSOP) and/or employee stock ownership program (ESOP).

Kebijakan Pengungkapan Informasi
Information Disclosure Policy

Sesuai dengan Peraturan Otoritas Jasa Keuangan No. 4 Tahun 2024 tentang Laporan Kepemilikan atau Setiap Perubahan Kepemilikan Saham Perusahaan Terbuka, anggota Dewan Komisaris dan Direksi wajib melaporkan kepada Otoritas Jasa Keuangan setiap kepemilikan atau perubahan kepemilikan saham pada perusahaan terbuka, baik secara langsung maupun tidak langsung. Laporan tersebut harus disampaikan paling lambat 5 (lima) hari kalender setelah kepemilikan atau perubahan terjadi, sebagaimana diatur dalam ketentuan terbaru.

Pursuant to the Financial Services Authority Regulation No. 4 of 2024 on Shareholding Report or Each Change on Public Companies Shareholding, members of the Board of Commissioners and Board of Directors are required to submit report to the Financial Services Authority regarding their shareholding and changes on shareholding in the public company, either directly or indirectly. Such report must be submitted no later than 5 (five) calendar days after shareholding or changes occur, as stipulated in the latest provisions.

Selain itu, anggota Dewan Komisaris dan Direksi juga diwajibkan menyampaikan informasi terkait kepemilikan atau perubahan kepemilikan saham kepada perusahaan terbuka. Informasi ini harus diterima oleh Bank paling lambat 3 (tiga) hari kerja setelah terjadinya kepemilikan atau perubahan tersebut.

Dalam praktik di Bank, anggota Dewan Komisaris dan Direksi melaporkan kepemilikan saham mereka kepada Sekretaris Perusahaan sesuai batas waktu yang telah ditentukan. Kebijakan mengenai kewajiban pelaporan kepemilikan dan perubahan kepemilikan saham oleh anggota Dewan Komisaris dan Direksi diatur dalam kebijakan internal Bank untuk memastikan kepatuhan terhadap peraturan.

Pada tahun 2024, Bank telah menyampaikan laporan kepemilikan saham anggota Dewan Komisaris dan Direksi kepada Otoritas Jasa Keuangan dan Bursa Efek Indonesia melalui *e-reporting*.

Adapun informasi kepemilikan saham Dewan Komisaris dan Direksi telah diungkapkan pada bab Profil Perusahaan.

In addition, members of the Board of Commissioners and Board of Directors are also required to submit information regarding shareholding or changes on shareholding to the public company. This information must be received by the Bank no later than 3 (three) working days after the shareholding or changes occur.

In practice at the Bank, members of the Board of Commissioners and Board of Directors report their shareholding to Corporate Secretary according to the specified deadline. The policy on obligation to report shareholding and changes on shareholding by members of the Board of Commissioners and Board of Directors is regulated in the Bank's internal policy to ensure compliance with regulations.

In 2024, the Bank submitted a report on shareholding of members of Board of Commissioners and Board of Directors to the Financial Services Authority and the Indonesia Stock Exchange through e-reporting.

Information on the Board of Commissioners and Board of Directors' shareholding is disclosed in the Company Profile chapter.

Kebijakan Penerapan Strategi Anti-Korupsi dan *Anti-Fraud* [POJK F.1] [G-07] [G-08]

Anti-Corruption and Anti-Fraud Strategy Implementation Policy

Di era globalisasi dan digitalisasi yang berkembang pesat, Bank menghadapi tantangan yang semakin komplek terkait risiko *fraud* atau kecurangan. *Fraud* dapat terjadi dalam berbagai bentuk, mulai dari penyalahgunaan wewenang, manipulasi data, hingga pencurian aset. Dampak dari tindakan *fraud* tidak hanya terbatas pada kerugian finansial, tetapi juga mencakup kerusakan reputasi, hilangnya kepercayaan dari nasabah dan investor, serta potensi sanksi dari regulator. Kebijakan terkait hal tersebut tertuang dalam Keputusan Direksi No. 007/SK-DIR/10/24 tanggal 16 Oktober 2024 tentang Kebijakan Penerapan Strategi *Anti-Fraud*.

Penerapan strategi *anti-fraud* memiliki tujuan utama untuk melindungi integritas, kepercayaan, dan keberlanjutan operasional Bank. Adapun tujuan dari penerapan strategi *anti-fraud* antara lain:

1. Mengurangi kemungkinan terjadinya tindakan *fraud* melalui penerapan kebijakan dan kontrol yang dirancang untuk menutup celah yang bisa dimanfaatkan untuk kecurangan;
2. Meminimalkan kerugian finansial dan operasional yang dapat timbul akibat *fraud*, serta mengurangi biaya terkait pemulihan dan litigasi sebagai upaya perbaikan proses untuk mencegah kejadian serupa di masa depan;
3. Mempertahankan dan meningkatkan kepercayaan nasabah, investor, dan regulator melalui komitmen yang kuat terhadap pencegahan dan penanganan *fraud;*
4. Memastikan kepatuhan terhadap peraturan dan standar yang ditetapkan oleh regulator seperti Otoritas Jasa Keuangan untuk menghindari sanksi hukum; dan

In the era of rapid globalization and digitalization, the Bank faces increasingly complex challenges related to the risk of fraud. Fraud can occur in various forms, ranging from abuse of authority, data manipulation, to theft of assets. The impact of fraud is not only limited to financial losses, but also includes reputational damage, loss of trust from customers and investors, and potential sanctions from regulators. The policy is stated in the Board of Directors' Decision Letter No. 007/SK-DIR/10/24 dated 16 October 2024 on Policy for Implementing Anti-Fraud Strategies.

The implementation of anti-fraud strategies has the main objective of protecting the integrity, trust, and sustainability of the Bank's operations. The objectives of implementing anti-fraud strategies are among others:

1. Reducing the possibility of fraud by implementing policies and controls designed to close loopholes that may be exploited for fraud;
2. Minimizing financial and operational losses that may arise due to fraud, and reducing costs related to recovery and litigation as process improvement efforts to prevent similar incident in the future;
3. Maintaining and increasing the trust of customers, investors, and regulators through a strong commitment to preventing and handling fraud;
4. Ensuring compliance with regulations and standards set by regulators such as the Financial Services Authority to avoid legal sanctions; and

5. Meningkatkan kesadaran (*awareness*) *anti-fraud* kepada *risk taking unit* sebagai upaya pencegahan, mitigasi, dan meminimalkan *fraud* yang dapat merugikan Bank secara finansial maupun yang dapat memengaruhi kinerja operasional Bank secara keseluruhan.

5. Raising anti-fraud awareness to risk taking unit as an effort to prevent, mitigate, and minimize fraud that may harm the Bank financially or that may affect the Bank's overall operational performance.

Sosialisasi Kebijakan Penerapan Strategi *Anti-Fraud*

Dalam upaya mendorong pencegahan tindakan *fraud*, Bank melibatkan seluruh karyawan untuk berperan aktif. Langkah ini diwujudkan melalui sosialisasi *anti-fraud* yang dilaksanakan secara berkelanjutan menggunakan berbagai kegiatan dan media internal. Pada tahun 2024, Bank telah menyelenggarakan sosialisasi penerapan strategi *anti-fraud* sebanyak 2 (dua) kali dalam bentuk *refreshment* mengenai *fraud*, dengan melibatkan karyawan dalam berbagai program pendidikan dan pelatihan terkait *anti-fraud.*

Dissemination of Anti-Fraud Strategy Implementation Policy

In an effort to encourage the prevention of fraud, the Bank engages all employees to play active roles. This step is realized through anti-fraud dissemination carried out continuously by using various internal activities and media. In 2024, the Bank held 2 (two) dissemination of anti-fraud strategy implementation in form of refreshment on fraud, by engaging employees in various education and training programs related to anti-fraud.

Kebijakan Perlakuan Adil Terhadap Pemegang Saham [G-08]

Policy on Fair Treatment of Shareholders

Seluruh Pemegang Saham Bank, baik minoritas maupun mayoritas, baik domestik dan non-domestik, diperlakukan secara setara. Perlakuan adil terhadap Pemegang Saham telah diatur dalam Surat Keputusan Direksi No. 013/SK-DIR/07/24 tanggal 29 Juli 2024 perihal Kebijakan *Good Corporate Governance* (GCG) sesuai dengan ketentuan Otoritas Jasa Keuangan yang berlaku. Informasi yang relevan bagi Pemegang Saham dipublikasikan kepada masyarakat melalui media yang mudah diakses Pemegang Saham (situs web Bank, Bursa Efek Indonesia, dan KSEI) dalam bahasa Indonesia dan bahasa Inggris.

All Shareholders of the Bank, both minority and majority, either domestic or non-domestic, are treated equally. Fair treatment of Shareholders is regulated in the Board of Directors' Decision Letter No. 013/SK-DIR/07/24 dated 29 July 2024 on Policy of Good Corporate Governance (GCG) according to the applicable provisions of the Financial Services Authority. Information relevant to Shareholders is published to the public through media that is easily accessible to Shareholders (the website of the Bank, Indonesia Stock Exchange, and KSEI) in Indonesian and English.

Kebijakan Pencegahan *Insider Trading* [POJK F.1] [G-08]

Policy to Prevent Insider Trading

Kebijakan pencegahan *insider trading* di Bank telah diatur dalam Kode Etik. Kebijakan ini menekankan bahwa Dewan Komisaris, Direksi, dan seluruh karyawan Bank dilarang mengambil manfaat dari pengetahuan yang umumnya tidak tersedia di pasar maupun membocorkan rencana-rencana Bank yang belum dipublikasikan kepada pihak yang tidak berkepentingan.

The policy to prevent insider trading at the Bank is regulated in the Code of Conduct. This policy emphasizes that the Board of Commissioners, Board of Directors, and all employees of the Bank are prohibited from taking advantage of knowledge generally not available in the market or leaking information to unauthorized parties regarding the Bank's plans that are not published yet.

Whistleblowing System [POJK F.1]

Whistleblowing System

Bank telah membentuk sistem pelaporan pelanggaran (*whistleblowing system*/WBS) sebagai upaya meningkatkan efektivitas penerapan sistem pengendalian *fraud*. Sistem ini berfokus pada pengungkapan melalui pengaduan atau pelaporan pelanggaran guna mengantisipasi setiap potensi kecurangan serta mendukung penegakan prinsip GCG. Dengan adanya WBS, diharapkan tercipta lingkungan kerja yang lebih transparan, bersih, dan bertanggung jawab.

The Bank has established the whistleblowing system (WBS) as an effort to increase the effectiveness of fraud control system implementation. This system focuses on disclosure through complaints or violation reporting to anticipate any potential fraud and to support the enforcement of GCG principles. The existence of WBS is expected to create a more transparent, clean, and responsible work environment.

Kebijakan *Whistleblowing System*

Kebijakan WBS Bank ditetapkan melalui Keputusan Direksi No. 008/SK-DIR/11/24 tanggal 20 November 2024 tentang Standar Operasional Prosedur *Whistleblowing System*. Standar operasional prosedur ini mencakup pengaturan terkait struktur pengelolaan WBS, mekanisme kerja, hingga prosedur pelaporan pelanggaran. Selain itu, kebijakan WBS Bank menetapkan landasan hukum untuk perlindungan pelapor, jenis perlindungan yang diberikan, serta proses monitoring dan *review* terhadap pelaksanaan sistem guna memastikan efektivitasnya.

Standar operasional prosedur WBS juga menetapkan pengelola untuk melaksanakan hal-hal sebagai berikut:

1. Melaksanakan program promosi dan sosialisasi secara ekstensif dan intensif supaya pelaksanaan prosedur WBS dapat dipahami dengan benar;
2. Menyelenggarakan tata laksana organisasi sedemikian rupa sehingga laporan pelanggaran yang disampaikan dapat ditangani dengan baik serta terdokumentasi dengan baik, namun kerahasiaan pelapor juga tetap terjamin;
3. Melakukan laporan setiap semester kepada Direksi tentang pelaksanaan program WBS terkait laporan dugaan pelanggaran, meliputi sekurang-kurangnya:
    a. Apakah prosedur WBS dapat diterapkan dengan baik dan mendapatkan sambutan yang positif dari karyawan ataupun para pemangku kepentingan lainnya?
    b. Apakah prosedur WBS cukup efektif dalam melakukan deteksi dini dan pencegahan penyimpangan ataupun pelanggaran?
    c. Apakah terdapat suatu pola pelanggaran tertentu yang sering berulang? Apakah kira-kira penyebabnya?
    d. Saran perbaikan untuk meningkatkan efektivitas penerapan WBS dalam mencapai sasaran penciptaan iklim kerja yang terbuka, tulus, dan bertanggung jawab.

Whistleblowing System Policy

The Bank's WBS policy is stipulated through the Board of Directors' Decision No. 008/SK-DIR/11/24 dated 20 November 2024 on Standard Operating Procedures for Whistleblowing System. This standard operating procedures include regulations related to WBS management structure, work mechanism, and procedures for reporting violation. In addition, the Bank's WBS policy establishes legal basis for whistleblower protection, types of protection provided, and monitoring and review process for system implementation to ensure its effectiveness.

The standard operating procedures for WBS also require the managers to carry out the following matters:

1. Carry out an extensive and intensive promotion and dissemination program so that the implementation of WBS procedures can be understood correctly;
2. Conduct organizational governance in such a way that the violation report submitted can be handled properly and well documented, but the confidentiality of the reporter is also guaranteed;
3. Conduct a semester report to the Board of Directors on the implementation of WBS program on allegedly infringement reports, which include at least:
    a. Is the WBS procedure properly implemented and gained positive response from employees or other stakeholders?
    b. Is the WBS procedure effective enough in early detection and prevention of irregularities or offenses?
    c. Is there any particular pattern of repeated violations? What are the causes?
    d. Suggestions for improvement to increase the effectiveness of WBS implementation in achieving the objectives of creating an open, sincere, and responsible work climate.

Sosialisasi Kebijakan *Whistleblowing System*

Sosialisasi Internal

1. Tim Pengelola WBS secara rutin mengadakan pelatihan untuk meningkatkan kesadaran karyawan terkait WBS; dan
2. Pengiriman e-*mail* bulanan kepada karyawan untuk memberikan edukasi dan pengingat tentang kebijakan WBS.

Dissemination of Whistleblowing System Policy

Internal Dissemination

1. The WBS Management Team regularly holds training to increase employee awareness regarding WBS; and
2. Sending monthly e-mails to employees to provide education and reminders about WBS policy.

Sosialisasi Eksternal

1. Informasi mengenai kebijakan WBS disampaikan melalui situs web Bank;
2. Penyebaran materi WBS melalui buletin internal dan poster yang dipasang di area kerja; dan
3. Kegiatan sosialisasi etika yang dilakukan kepada pihak eksternal terkait.

External Dissemination

1. Information on WBS policy is presented through the Bank's website;
2. Dissemination of WBS materials through internal bulletins and posters installed in working areas; and
3. Activities of ethics dissemination carried out to related external parties.

Jenis Pelanggaran yang Dapat Dilaporkan

Pelanggaran yang dapat dilaporkan kepada Tim WBS mencakup berbagai hal dan permasalahan, namun dibatasi pada tindakan yang terjadi, dilakukan, atau berkaitan dengan Bank. Berikut beberapa jenis pelanggaran dan penyimpangan yang dapat dilaporkan berdasarkan kebijakan ini, antara lain:

1. Seluruh tindakan melanggar hukum pidana (misalnya: pencurian, penipuan, penggunaan narkoba, dan lain sebagainya);
2. Penyalahgunaan wewenang dalam melayani nasabah, debitur, vendor atau pemasok lainnya (misalnya: penundaan pembayaran tidak beralasan, pemerasan, dan lain sebagainya);
3. Pelanggaran peraturan perbankan yang diatur dalam Undang-Undang tentang Perbankan (misalnya: tidak melaksanakan prinsip kehati-hatian, membuka rahasia nasabah kepada yang tidak berhak, melakukan pencatatan yang tidak benar, meminta uang atas jasa pelayanan perbankan yang dilakukan);
4. Pelanggaran peraturan perpajakan atau aturan pelaporan keuangan perusahaan yang tidak sesuai dengan Pernyataan Standar Akuntansi Keuangan;
5. Perbuatan yang dapat merugikan Bank, baik finansial maupun non-finansial, termasuk mencederai citra Bank;
6. Pelanggaran aturan internal yang dapat menciderai integritas pelaporan perusahaan, baik di bidang keuangan ataupun bidang lainnya; dan
7. Perbuatan yang membahayakan keselamatan dan kesehatan kerja.

Types of Violation that Can Be Reported

Violations that can be reported to the WBS Team include various matters and problems, but are limited to actions that occur, are carried out, or are related to the Bank. The following are some types of violation and irregularity that can be reported based on this policy, including:

1. All actions that violate criminal law (e.g. theft, fraud, drug use, etc.);
2. Misuse of authority in serving the customers, debtors, vendors, or other suppliers (e.g. unwarranted payment delays, extortion, etc.);
3. Violation of banking regulations stipulated in Banking Law (for example: not practicing prudent principles, disclosing customers' confidential information to unauthorized parties, making incorrect records, asking for money for the banking services performed);
4. Violations of tax regulations or corporate financial reporting regulations that are not in accordance with the Statement of Financial Accounting Standards;
5. Acts that may harm the Bank, both financially and non-financially, including harm the Bank's image;
6. Violations of internal rules that may jeopardize the integrity of the corporate reporting, whether in finance or other fields; and
7. Acts that endanger occupational safety and health.

Cara Penyampaian Laporan Pelanggaran dan Pihak yang Mengelola Pelanggaran

Bank Victoria telah menerapkan mekanisme WBS yang memungkinkan pelapor untuk melaporkan dugaan pelanggaran melalui berbagai saluran komunikasi. Pelapor dapat menyampaikan laporan secara lisan, melalui surat, *e-mail*, telepon, atau SMS kepada Departemen *Anti-Fraud* dengan rincian sebagai berikut:

1. Melalui Surat
   Laporan dapat ditujukan kepada Direktur Kepatuhan dan Manajemen Risiko dan ditembuskan kepada Departemen *Anti-Fraud* di alamat Graha BIP Lantai 10, Jl. Gatot Subroto Kav. 23, Karet Semanggi, Setiabudi, Jakarta Selatan, DKI Jakarta 12930.
2. Melalui *E-mail*
   a. Departemen *Anti-Fraud*, jika terlapor adalah karyawan, dapat dihubungi melalui e-mail: unitantifraud@victoriabank.co.id.
   b. Direktur Kepatuhan dan Manajemen Risiko, jika terlapor adalah anggota Dewan Komisaris, dapat dihubungi melalui *e-mail*: unitantifrauddireksi@victoriabank.co.id.

Mechanism to Submit Whistleblowing Report and Party Managing the Violations

Bank Victoria has implemented WBS mechanism that allows whistleblower to report suspected violation through various communication channels. Whistleblower can submit reports in verbal, by letter, e-mail, telephone, or SMS to the Anti-Fraud Department with the following details:

1. By Mail
   Reports can be addressed to the Director of Compliance and Risk Management with a copy to the Anti-Fraud Department at Graha BIP 10th Floor Jl. Gatot Subroto Kav. 23, Karet Semanggi, Setiabudi, South Jakarta, DKI Jakarta 12930.
2. By E-mail
   a. Anti-Fraud Department, if the reported party is an employee, can be contacted via e-mail: unitantifraud@victoriabank.co.id.
   b. Director of Compliance and Risk Management, if the reported party is member of the Board of Commissioners, can be contacted via e-mail: unitantifrauddireksi@victoriabank.co.id.

c. Dewan Komisaris, jika terlapor adalah anggota Direksi, dapat dihubungi melalui *e-mail*: unitantifraudkomisaris@victoriabank.co.id.

3. Melalui Telepon atau SMS
   Laporan dapat disampaikan melalui nomor telepon atau SMS ke: 0811 9615 009.

Dengan mekanisme ini, Bank Victoria memastikan kemudahan akses bagi pelapor dalam melaporkan pelanggaran.

Perlindungan bagi Pelapor

Bank mendorong setiap pelapor untuk mencantumkan identitas guna mempermudah Tim *Anti-Fraud* dalam melakukan klarifikasi serta investigasi terhadap laporan yang diterima. Bank memberikan jaminan penuh atas kerahasiaan identitas pelapor, yang akan dijaga oleh Tim *Anti-Fraud* serta dijamin oleh Dewan Komisaris dan Direksi. Informasi minimal yang diperlukan dari pelapor mencakup alamat surat atau *e-mail*, nomor telepon, atau nomor telepon genggam.

Jika pelapor merasa terancam setelah melaporkan dugaan pelanggaran, Bank berkewajiban memberikan perlindungan sebagai berikut:

1. Perlindungan fisik bagi pelapor dan keluarganya;
2. Perlindungan atas harta benda pelapor dan keluarganya terhadap ancaman, teror, atau tindakan balas dendam;
3. Perlindungan administratif, termasuk pencegahan terhadap penundaan kenaikan pangkat, pemecatan, pengucilan di tempat kerja, mutasi yang tidak adil, serta jaminan keamanan kerja; dan
4. Perlindungan hukum dalam proses litigasi di Pengadilan Negeri, termasuk biaya hukum yang ditanggung, dan jika diperlukan, perlindungan tambahan melalui Lembaga Perlindungan Saksi dan Korban.

Dengan perlindungan ini, Bank Victoria berkomitmen untuk memastikan keamanan dan keselamatan pelapor dalam menjalankan perannya sebagai pihak yang berani mengungkapkan tindakan pelanggaran.

Penanganan Pengaduan

Prosedur penanganan pengaduan, baik berupa keluhan, laporan, maupun informasi terkait tindakan tindakan yang diduga dapat berdampak pada *fraud*, dilakukan melalui prosedur sebagai berikut:

1. Jika laporan yang diterima terindikasi pelanggaran *fraud*, maka Departemen *Anti-Fraud* akan melakukan investigasi untuk memastikan kebenaran laporan tersebut; dan
2. Jika laporan yang diterima termasuk dalam kategori pelanggaran *non-fraud*, maka Departemen *Anti-Fraud* akan menginisiasi tindak lanjut dengan mengoordinasikan laporan tersebut kepada unit kerja terkait untuk penanganan lebih lanjut.

c. The Board of Commissioners, if the reported party is member of the Board of Directors, can be contacted via email: unitantifraudkomisaris@victoriabank.co.id.

3. By Telephone or SMS
   Reports can be submitted via telephone number or SMS to: 0811 9615 009.

With these mechanisms, Bank Victoria ensures easy access for the whistleblowers to report violations.

Protection for Whistleblower

The Bank encourages all whistleblowers to include their identity to make it easier for the Anti-Fraud Team to clarify and investigate the reports received. The Bank provides full guarantees for the confidentiality of the whistleblower's identity, which will remain confidential by the Anti-Fraud Team, which is guaranteed by the Board of Commissioners and Board of Directors. The minimum information required from the whistleblower is email address, phone number, or mobile phone number.

If the whistleblower feels threatened after reporting the alleged violation, the Bank is obligated to provide comprehensive protection, as follows:

1. Physical protection for the whistleblower and the family members;
2. Protection for the whistleblower's and family member's properties against threat, terror, or acts of revenge;
3. Administrative protection, including prevention of suspension in promotion, dismissal, expulsion at work, unfair transfer, and position security assurance; and
4. Legal protection in the litigation process in the District Court, including legal costs borne, and if necessary, additional protection through Witness and Victim Protection Agency.

With this protection, Bank Victoria is committed to ensuring whistleblowers' security and safety in carrying out their role as parties who dare to reveal acts of violation.

Complaint Handling

The complaint handling procedure, either in the form of complaints, reports, or information related to actions alleged of having an impact on fraud, is carried out through the following procedures:

1. If the report received indicates fraud violation, the Anti-Fraud Department will conduct an investigation to ensure the truth of the report; and
2. If the report received is included in category of non-fraud violation, the Anti-Fraud Department will initiate follow-up by coordinating the report to relevant work unit for further handling.

Laporan Pelanggaran Tahun 2024 dan Tindak Lanjutnya

Sepanjang tahun 2024, Bank tidak menerima laporan pelanggaran melalui WBS.

Whistleblowing Report in 2024 and Its Follow Up

Throughout 2024, the Bank did not receive any reports of violations through the WBS.

Akses Informasi dan Data Perusahaan

Access to Company's Information and Data

Pemangku kepentingan dapat mengakses informasi dan data Bank melalui:

Stakeholders can access the Bank's information and data through:

Corporate Secretary
Gedung Graha BIP Lantai 10
Graha BIP Building 10th Fl.
Jl. Gatot Subroto Kav. 23
Jakarta Selatan / South Jakarta 12930
(021) 522 8888
(021) 522 8777
corsec@victoriabank.co.id
www.victoriabank.co.id

Situs Web
Website

Memuat informasi keuangan dan non-keuangan, produk/fasilitas, laporan wajib, peluang karier, dan saluran informasi lainnya, yaitu:

Contains financial and non-financial information, products/facilities, mandatory reports, career opportunities, and other information channels, namely:

Call center	: 1500977
E-mail	: costumercare@victoriabank.co.id
Facebook	: @BankVictoriaID
Youtube	: Bank Victoria
Instagram	: @bankvictoria



Siaran Pers
Press Release

Menggunakan *article placement* dalam menyampaikan informasi kegiatan terkait kinerja dan lainnya. Pada tahun 2024, Bank menerbitkan 15 (lima belas) artikel.

Uses article placement in conveying information on activities related to performance and others. In 2024, the Bank published 15 (fifteen) articles.

Buletin
Bulletin

Bank menerbitkan buletin yang dikenal dengan nama Victoria News. Pada tahun 2024, Victoria News menerbitkan 11 (sebelas) konten.

The Bank issue a bulletin known as Victoria News. In 2024, Victoria News issued 11 (eleven) content.

Media Elektronik
Electronic Media

E-mail	: corsec@victoriabank.co.id
Situs web / Website	: www.victoria.co.id

Pemangku kepentingan dapat mendaftarkan identitas dan alamat *e-mail* pada *mailing list* melalui situs web Bank untuk mendapatkan informasi secara berkala.

Stakeholders can register their identity and email address on the mailing list via the Bank's website to regularly receive information.

Implementasi Tata Kelola Perusahaan Terbuka

Implementation of Corporate Governance of Public Company

Penerapan GCG di Bank dilaksanakan berdasarkan Pedoman Tata Kelola Perusahaan Terbuka yang diatur dalam Peraturan Otoritas Jasa Keuangan No. 21/POJK.04/2015 dan Surat Edaran Otoritas Jasa Keuangan No. 32/SEOJK.04/2015. Penerapan pedoman tersebut di sepanjang tahun 2024 diuraikan sebagai berikut:

GCG at the Bank is implemented based on Guidelines for Public Company's Governance stipulated in Financial Services Authority Regulation No. 21/POJK.04/2015 and Financial Services Authority Circular No. 32/SEOJK.04/2015. The implementation of these guidelines throughout 2024 was described as follows:

Aspek 1: Hubungan Perusahaan Terbuka dengan Pemegang Saham dalam Menjamin Hak-Hak Pemegang Saham
Aspect 1: Relationship between the Public Company and Shareholders in Guaranteeing the Shareholders' Rights

Prinsip 1: Meningkatkan Nilai Penyelenggaraan RUPS.
Principle 1: Increasing the Value of Convening GMS.

Rekomendasi 1: Recommendation 1:	Penerapan: Implementation:	Status:
Perusahaan terbuka memiliki cara atau prosedur teknis pengumpulan suara (voting), baik secara terbuka maupun tertutup yang mengedepankan independensi, dan kepentingan Pemegang Saham. The public company has technical voting methods or procedures, either open or close, prioritizing independence, and interest of Shareholders.	Teknis pengumpulan suara dalam RUPS diatur dalam tata tertib RUPS (dibagikan kepada Pemegang Saham atau kuasanya yang hadir dan dibacakan sebelum penyelenggaraan RUPS) serta dalam Anggaran Dasar untuk mengedepankan independensi dan kepentingan Pemegang Saham. Sebagai bentuk transparansi, Pemegang Saham dan masyarakat luas juga dapat mengunduh tata tertib RUPS pada situs web Bank. The technique of collecting votes at GMS is regulated in the GMS rules of procedure (distributed to Shareholders or their proxies who are present and read out before the GMS is held) and in the Articles of Association to prioritize the independence and interests of Shareholders. As a form of transparency, Shareholders and the wider community can also download GMS rules of procedure on the Bank's website.	Terpenuhi Complied
Rekomendasi 2: **Recommendation 2:**	**Penerapan:** **Implementation:**	**Status:**
Seluruh anggota Direksi dan anggota Dewan Komisaris perusahaan terbuka hadir dalam RUPS Tahunan. All members of Board of Directors and members of Board of Commissioners of the public company attend the Annual GMS.	Seluruh anggota Dewan Komisaris dan Direksi Bank hadir dalam RUPS Tahunan tanggal 14 Juni 2024. Anggota Dewan Komisaris dan Direksi yang hadir dapat mewakili Bank untuk memberikan penjelasan kepada Pemegang Saham atas setiap agenda RUPS Tahunan, sehingga dapat dilaksanakan dengan baik. All members of the Bank's Board of Commissioners and Board of Directors were present at the Annual GMS on 14 June 2024. Members of the Board of Commissioners and Board of Directors who were present can represent the Bank to provide explanations to Shareholders on each agenda of the Annual GMS, so that it can be implemented properly.	Terpenuhi Complied
Rekomendasi 3: **Recommendation 3:**	**Penerapan:** **Implementation:**	**Status:**
Ringkasan risalah RUPS tersedia dalam situs web perusahaan terbuka paling sedikit selama 1 (satu) tahun. Summary of GMS minutes is available on the public company's website for at least 1 (one) year.	Bank mengunggah ringkasan risalah RUPS di situs web, dan risalah lengkap RUPS tersebut tersedia di situs web selama lebih dari 1 (satu) tahun. The Bank uploads the summary of GMS minutes on the website, and the complete GMS minutes are available on the website for more than 1 (one) year.	Terpenuhi Complied

Prinsip 2: Meningkatkan Kualitas Komunikasi Perusahaan Terbuka dengan Pemegang Saham atau Investor.
Principle 2: Increasing the Communication Quality between the Public Company and Shareholders or Investors.

Rekomendasi 4: Recommendation 4:	Penerapan: Implementation:	Status:
Perusahaan terbuka memiliki suatu kebijakan komunikasi dengan Pemegang Saham atau investor. The public company has communication policy with the Shareholders or investors.	Bank memiliki kebijakan komunikasi dengan Pemegang Saham sebagaimana diatur dalam Anggaran Dasar. Bank juga menyampaikan informasi yang dapat diakses masyarakat luas melalui situs web Bank. The Bank has policy on communication with Shareholders as stipulated in the Articles of Association. The Bank also provides information that is accessible by the wider community through the Bank's website.	Terpenuhi Complied
Rekomendasi 5: **Recommendation 5:**	**Penerapan:** **Implementation:**	**Status:**
Perusahaan terbuka mengungkapkan kebijakan komunikasi perusahaan terbuka dengan Pemegang Saham atau investor dalam situs web. The public company discloses its policy on communication with Shareholders or investors on the website.	Kebijakan komunikasi Bank dengan Pemegang Saham dan investor telah diungkapkan dalam situs web Bank. The Bank's policy on communication with Shareholders and investors has been disclosed on the Bank's website.	Terpenuhi Complied

Aspek 2: Fungsi dan Peran Dewan Komisaris
Aspect 2: Functions and Roles of the Board of Commissioners

Prinsip 3: Memperkuat Keanggotaan dan Komposisi Dewan Komisaris.
Principle 3: Strengthening the Board of Commissioners' Membership and Composition.

Rekomendasi 6: **Recommendation 6:**	**Penerapan:** **Implementation:**	**Status:**
Penentuan jumlah anggota Dewan Komisaris mempertimbangkan kondisi perusahaan terbuka. The determination of number of Board of Commissioners' members considers the public company's condition.	Jumlah dan komposisi anggota Dewan Komisaris, termasuk pemenuhan jumlah Komisaris Independen telah sesuai dengan kondisi Bank sebagaimana diatur dalam Anggaran Dasar, *BOC Charter*, dan Peraturan Otoritas Jasa Keuangan. The number and composition of the Board of Commissioners, including the fulfillment of the number of Independent Commissioners, are in accordance with the Bank's conditions as stipulated in the Articles of Association, BOC Charter, and Financial Services Authority Regulations.	Terpenuhi Complied
Rekomendasi 7: **Recommendation 7:**	**Penerapan:** **Implementation:**	**Status:**
Penentuan komposisi anggota Dewan Komisaris memperhatikan keberagaman keahlian, pengetahuan, dan pengalaman yang dibutuhkan. The determination of Board of Commissioners' composition considers the range of expertise, knowledge, and experience required.	Dewan Komisaris Bank memiliki latar belakang yang beragam dalam hal keahlian, pengetahuan, dan pengalaman yang bertujuan untuk mendukung perkembangan bisnis Bank. Hal tersebut dapat dilihat dari profil masing-masing Dewan Komisaris. The Bank's Board of Commissioners has a diverse background in terms of expertise, knowledge, and experience that aims to support the Bank's business development. This can be seen from the profile of each Board of Commissioners.	Terpenuhi Complied

Prinsip 4: Meningkatkan Kualitas Pelaksanaan Tugas dan Tanggung Jawab Dewan Komisaris.
Principle 4: Increasing the Quality of Implementation of Board of Commissioners' Duties and Responsibilities.

Rekomendasi 8: **Recommendation 8:**	**Penerapan:** **Implementation:**	**Status:**
Dewan Komisaris mempunyai kebijakan penilaian sendiri *(self-assessment)* untuk menilai kinerja Dewan Komisaris. The Board of Commissioners has self-assessment policy to assess the Board of Commissioners' performance.	Kebijakan penilaian kinerja Dewan Komisaris telah diatur dalam *BOC Charter* serta diungkapkan dalam Laporan Tahunan ini beserta dengan hasil penilaiannya. The Board of Commissioners' performance assessment policy has been stipulated in BOC Charter and is disclosed in this Annual Report along with its assessment results.	Terpenuhi Complied
Rekomendasi 9: **Recommendation 9:**	**Penerapan:** **Implementation:**	**Status:**
Kebijakan penilaian sendiri *(self-assessment)* untuk menilai kinerja Dewan Komisaris, diungkapkan melalui Laporan Tahunan perusahaan terbuka. The self-assessment policy to assess the Board of Commissioners' performance is disclosed in the public company's Annual Report.	Kebijakan penilaian kinerja Dewan Komisaris telah diatur dalam *BOC Charter* serta diungkapkan dalam Laporan Tahunan ini beserta dengan hasil penilaiannya. The Board of Commissioners' performance assessment policy has been stipulated in BOC Charter and is disclosed in this Annual Report along with its assessment results.	Terpenuhi Complied
Rekomendasi 10: **Recommendation 10:**	**Penerapan:** **Implementation:**	**Status:**
Dewan Komisaris mempunyai kebijakan terkait pengunduran diri anggota Dewan Komisaris apabila terlibat dalam kejahatan keuangan. The Board of Commissioners has policy related to resignation of the Board of Commissioners' members if involved in financial crime.	Dewan Komisaris telah memiliki *BOC Charter* yang mengatur mengenai pemberhentian Dewan Komisaris apabila terlibat dalam kejahatan keuangan dan terbukti melakukan kesalahan. The Board of Commissioners has the BOC Charter that regulates the dismissal of the Board of Commissioners in the event they are involved in a financial crime and are proven to have made a mistake.	Terpenuhi Complied
Rekomendasi 11: **Recommendation 11:**	**Penerapan:** **Implementation:**	**Status:**
Dewan Komisaris atau Komite yang menjalankan fungsi nominasi dan remunerasi menyusun kebijakan suksesi dalam proses nominasi anggota Direksi. The Board of Commissioners or Committee performing nomination and remuneration functions prepares the succession policy for the nomination process of the Board of Directors' members.	Komite Remunerasi dan Nominasi telah memiliki kebijakan terkait nominasi anggota Direksi yang diatur dalam Kebijakan Sistem Nominasi dan Remunerasi. The Remuneration and Nomination Committee has a policy related to nomination of members of the Board of Directors which is stipulated in the Nomination and Remuneration System Policy.	Terpenuhi Complied

Aspek 3: Fungsi dan Peran Direksi
Aspect 3: Functions and Roles of the Board of Directors

Prinsip 5: Memperkuat Keanggotaan dan Komposisi Direksi.
Principle 5: Strengthening the Board of Directors' Membership and Composition.

Rekomendasi 12: Recommendation 12:	Penerapan: Implementation:	Status:
Penentuan jumlah anggota Direksi mempertimbangkan kondisi perusahaan terbuka, serta efektivitas dalam pengambilan keputusan. The determination of number of Board of Directors' members considers the public company's condition and effectiveness in decision-making.	Jumlah dan komposisi anggota Direksi telah sesuai dengan kondisi Bank sebagaimana diatur dalam Anggaran Dasar, *BOD Charter*, dan Peraturan Otoritas Jasa Keuangan. The number and composition of members of the Board of Directors are in accordance with the Bank's conditions as stipulated in the Articles of Association, BOD Charter, and Financial Services Authority Regulations.	Terpenuhi Complied
Rekomendasi 13: **Recommendation 13:**	**Penerapan:** **Implementation:**	**Status:**
Penentuan komposisi anggota Direksi memperhatikan, keberagaman keahlian, pengetahuan, dan pengalaman yang dibutuhkan. The determination of Board of Directors' composition considers the range of expertise, knowledge, and experience required.	Direksi Bank memiliki latar belakang yang beragam dalam hal keahlian, pengetahuan, dan pengalaman yang bertujuan untuk mendukung perkembangan bisnis Bank. Hal tersebut dapat dilihat dari profil masing-masing Direksi. The Bank's Board of Directors has a diverse background in terms of expertise, knowledge, and experience that aims to support the Bank's business development. This can be seen from the profile of each Board of Directors.	Terpenuhi Complied
Rekomendasi 14: **Recommendation 14:**	**Penerapan:** **Implementation:**	**Status:**
Anggota Direksi yang membawahi bidang akuntansi atau keuangan memiliki keahlian dan/atau pengetahuan di bidang akuntansi. The Board of Directors' member in charge of accounting or finance has the expertise and/or knowledge in accounting.	Anggota Direksi yang membawahi bidang akuntansi dan keuangan memiliki pengalaman di bidang keuangan dan akuntansi. Members of the Board of Directors in charge of accounting and finance have experience in finance and accounting.	Terpenuhi Complied

Prinsip 6: Meningkatkan Kualitas Pelaksanaan Tugas dan Tanggung Jawab Direksi.
Principle 6: Increasing the Quality of Implementation of Board of Directors' Duties and Responsibilities.

Rekomendasi 15: Recommendation 15:	Penerapan: Implementation:	Status:
Direksi mempunyai kebijakan penilaian sendiri *(self-assessment)* untuk menilai kinerja Direksi. The Board of Directors has self-assessment policy to assess the Board of Directors' performance.	Kebijakan penilaian kinerja Direksi telah diatur dalam *BOD Charter* serta diungkapkan dalam Laporan Tahunan ini beserta dengan hasil penilaiannya. The Board of Directors' performance assessment policy has been stipulated in BOD Charter and is disclosed in this Annual Report along with its assessment results.	Terpenuhi Complied
Rekomendasi 16: **Recommendation 16:**	**Penerapan:** **Implementation:**	**Status:**
Kebijakan penilaian sendiri *(self-assessment)* untuk menilai kinerja Direksi diungkapkan melalui Laporan Tahunan perusahaan terbuka. The self-assessment policy to assess the Board of Directors' performance is disclosed in the public company's Annual Report.	Kebijakan penilaian kinerja Direksi telah diatur dalam *BOD Charter* serta diungkapkan dalam Laporan Tahunan ini beserta dengan hasil penilaiannya. The Board of Directors' performance assessment policy has been stipulated in BOD Charter and is disclosed in this Annual Report along with its assessment results.	Terpenuhi Complied
Rekomendasi 17: **Recommendation 17:**	**Penerapan:** **Implementation:**	**Status:**
Direksi mempunyai kebijakan terkait pengunduran diri anggota Direksi apabila terlibat dalam kejahatan keuangan. The Board of Directors has policy related to resignation of the Board of Directors' members if involved in financial crime.	Dewan Komisaris telah memiliki *BOD Charter* yang mengatur mengenai pemberhentian Dewan Komisaris apabila terlibat dalam kejahatan keuangan dan terbukti melakukan kesalahan. The Board of Directors has the BOD Charter that regulates the dismissal of the Board of Directors in the event they are involved in a financial crime and are proven to have made a mistake.	Terpenuhi Complied

Aspek 4: Partisipasi Pemangku Kepentingan
Aspect 4: Stakeholders Participation

Prinsip 7: Meningkatkan Aspek Tata Kelola Perusahaan Melalui Partisipasi Pemangku Kepentingan.
Principle 7: Increasing the Corporate Governance Aspect Through Stakeholders Participation.

Rekomendasi 18: Recommendation 18:	Penerapan: Implementation:	Status:
Perusahaan terbuka memiliki kebijakan untuk mencegah terjadinya *insider trading*. The public company has a policy to prevent the occurrence of insider trading.	Bank memiliki kebijakan untuk mencegah terjadinya *insider trading* yang diatur dalam Kode Etik. The Bank has a policy to prevent insider trading as stipulated in the Code of Conduct.	Terpenuhi Complied
Rekomendasi 19: **Recommendation 19:**	**Penerapan:** **Implementation:**	**Status:**
Perusahaan terbuka memiliki kebijakan anti-korupsi dan *anti-fraud*. The public company has anti-corruption and anti-fraud policy.	Bank menjalankan program dan prosedur anti-korupsi dan *anti-fraud* sesuai dengan Keputusan Direksi No. 007/SK-DIR/10/24 tanggal 16 Oktober 2024 tentang Kebijakan Penerapan Strategi *Anti-Fraud* dan No. 008/SK-DIR/10/24 tanggal 16 Oktober 2024 tentang Standar Operasional Prosedur Penerapan Strategi *Anti-Fraud*, yang juga diatur dalam Kode Etik. The Bank implements anti-corruption and anti-fraud programs and procedures in accordance with the Board of Directors' Decision No. 007/SK-DIR/10/24 dated 16 October 2024 on Policy for Implementing Anti-Fraud Strategies and No. 008/SK-DIR/10/24 dated 16 October 2024 on Standard Operating Procedures for Implementing Anti-Fraud Strategies, which are also stipulated in the Code of Conduct.	Terpenuhi Complied
Rekomendasi 20: **Recommendation 20:**	**Penerapan:** **Implementation:**	**Status:**
Perusahaan terbuka memiliki kebijakan tentang seleksi dan peningkatan kemampuan pemasok atau vendor. The public company has a policy on selection and improvement of supplier's or vendor's capabilities.	Bank memiliki kebijakan tentang seleksi dan peningkatan kemampuan pemasok atau vendor yang diatur dalam Surat Keputusan Direktur No. 027/SK-DIR/06/23 tanggal 27 Juni 2023 tentang Kebijakan Pengadaan Inventaris/Barang Lainnya dan Jasa. The Bank has a policy on selection and improvement of supplier or vendor capabilities as stipulated in the Board of Directors' Decision Letter No. 027/SK-DIR/06/23 dated 27 June 2023 on Procurement Policy for Inventory/Other Goods and Services.	Terpenuhi Complied
Rekomendasi 21: **Recommendation 21:**	**Penerapan:** **Implementation:**	**Status:**
Perusahaan terbuka memiliki kebijakan tentang pemenuhan hak-hak kreditur. The public company has a policy on the fulfillment of creditor's rights.	Bank memiliki kebijakan tentang pemenuhan hak-hak kreditur yang diatur dalam Kode Etik. The Bank has a policy on the fulfillment of creditor's rights as stipulated in the Code of Conduct.	Terpenuhi Complied
Rekomendasi 22: **Recommendation 22:**	**Penerapan:** **Implementation:**	**Status:**
Perusahaan terbuka memiliki kebijakan sistem WBS. The public company has a policy on WBS system.	Bank telah memiliki kebijakan sistem WBS dan telah dimutakhirkan melalui Keputusan Direksi No. 007/SK-DIR/10/24 tanggal 16 Oktober 2024 tentang Kebijakan Penerapan Strategi *Anti-Fraud* dan No. 008/SK-DIR/10/24 tanggal 16 Oktober 2024 tentang Standar Operasional Prosedur Penerapan Strategi *Anti-Fraud*. The Bank has a policy on WBS system which has been updated through the Board of Directors' Decision No. 007/SK-DIR/10/24 dated 16 October 2024 on Policy for Implementing Anti-Fraud Strategies and No. 008/SK-DIR/10/24 dated 16 October 2024 on Standard Operating Procedures for Implementing Anti-Fraud Strategies.	Terpenuhi Complied
Rekomendasi 23: **Recommendation 23:**	**Penerapan:** **Implementation:**	**Status:**
Perusahaan terbuka memiliki kebijakan pemberian insentif jangka panjang kepada Direksi dan karyawan. The public company has a policy on provision of long-term incentive for the Board of Directors and employees.	Bank menerapkan program insentif jangka panjang bagi Direksi dan karyawan berdasarkan Keputusan Direksi No. 001A/SK-DIR/12/22 tanggal 1 Desember 2022 tentang Kebijakan dan Prosedur *Human Capital Management*. Informasi terkait pemberian insentif ini tercatat dalam Laporan Keuangan, khususnya pada bagian Liabilitas Imbalan Kerja, yang disertakan dalam Laporan Tahunan ini. The Bank implements long-term incentives program for the Board of Directors and employees based on the Board of Directors' Decision No. 001A/SK-DIR/12/22 dated 1 December 2022 on Human Capital Management Policies and Procedures. Information related to the provision of the incentives is documented in the Financial Statements, specifically in the Employee Benefits Obligation section as included in this Annual Report.	Terpenuhi Complied

Aspek 5: Keterbukaan Informasi Aspect 5: Information Disclosure		
Prinsip 8: Meningkatkan Pelaksanaan Keterbukaan Informasi. **Principle 8: Increasing the Implementation of Information Disclosure.**		
Rekomendasi 24: **Recommendation 24:**	**Penerapan:** **Implementation:**	**Status:**
Perusahaan terbuka memanfaatkan penggunaan teknologi informasi secara lebih luas selain situs web sebagai media keterbukaan informasi. The public company utilizes information technology more broadly, in addition to the website, as a media for information disclosure.	Selain situs web, Bank juga memanfaatkan teknologi informasi lainnya seperti media sosial, IDX Net, dan Sistem Pelaporan Otoritas Jasa Keuangan sebagai saluran media untuk keterbukaan informasi. In addition to website, the Bank also utilizes other information technologies such as social media, IDX Net, and Financial Services Authority Reporting System as media channels for information disclosure.	Terpenuhi Complied
Rekomendasi 25: **Recommendation 25:**	**Penerapan:** **Implementation:**	**Status:**
Laporan Tahunan perusahaan terbuka mengungkapkan pemilik manfaat akhir dalam kepemilikan saham perusahaan terbuka paling sedikit 5%, selain pengungkapan pemilik manfaat akhir dalam kepemilikan saham perusahaan terbuka melalui Pemegang Saham Utama dan Pengendali. The public company's Annual Report discloses the ultimate beneficial owner of the public company's share ownership of at least 5%, in addition to the disclosure of the ultimate beneficial owner in the share ownership of public company through the Main and Controlling Shareholders.	Laporan Tahunan Bank telah mengungkapkan informasi pemilik manfaat akhir dalam kepemilikan saham serta informasi Pemegang Saham Utama dan Pengendali pada bab Profil Perusahaan. The Bank's Annual Report has disclosed information on the ultimate beneficial owner in share ownership as well as information on Main and Controlling Shareholders in the Company Profile chapter.	Terpenuhi Complied

Pedoman Umum Governansi Korporat Indonesia

General Guidelines for Indonesian Corporate Governance

Komite Nasional Kebijakan Governansi (KNKG) telah menerbitkan Pedoman Umum Governansi Korporat Indonesia (PUGKI) 2021 sebagai pedoman untuk praktik governansi korporat berstandar global, yang direkomendasikan terutama untuk korporasi yang terdaftar di pasar modal dan mengelola dana masyarakat. Bank menerapkan prinsip dan rekomendasi PUGKI 2021 berdasarkan pendekatan "terpenuhi atau penjelasan" dengan rincian implementasi di Bank, sebagai berikut:

The National Committee for Governance Policy (KNKG) has issued the 2021 General Guidelines for Indonesian Corporate Governance (PUGKI) as a guideline for global standard corporate governance practices, recommended particularly for corporations listed on the capital market that manage public funds. The Bank applies the principles and recommendations of the 2021 PUGKI based on the "complied or explanation" approach with details of its implementation at the Bank as follows:

Prinsip 1: Peran dan Tanggung Jawab Direksi dan Dewan Komisaris Principle 1: Roles and Responsibilities of the Board of Directors and Board of Commissioners		
Rekomendasi 1.1: Peran dan Tanggung Jawab Direksi. **Recommendation 1.1: Roles and Responsibilities of the Board of Directors.**		
Rekomendasi 1.1.1: **Recommendation 1.1.1:**	**Keterangan:** **Description:**	**Status:**
Untuk mencapai penciptaan nilai yang berkelanjutan, Direksi menjalankan peran kepemimpinannya dan berupaya mencapai hasil governansi sebagai berikut: 1. Berdaya saing dan berfokus ke kinerja jangka panjang; 2. Beretika dan bertanggung jawab dalam menjalankan bisnis; 3. Berkontribusi positif terhadap masyarakat dan lingkungan; dan 4. Berkemampuan dalam bertahan dan bertumbuh (*corporate resilience*). To achieve sustainable value creation, the Board of Directors carries out its leadership role and seeks to achieve the following governance results: 1. Be competitive and focused on long-term performance; 2. Be ethical and responsible in conducting business; 3. Have positive contributions to the community and the environment; and 4. Be able to survive and grow (corporate resilience).	Dalam melaksanakan tugas dan fungsinya, Direksi fokus pada kinerja jangka panjang, menjunjung tinggi etika bisnis, bertanggung jawab terhadap lingkungan dan masyarakat, serta konsisten melakukan penyempurnaan untuk pertumbuhan yang berkelanjutan. In performing its duties and functions, the Board of Directors focuses on long-term performance, upholding business ethics, being responsible for the environment and community, and consistently making improvements for sustainable growth.	Terpenuhi Complied

Rekomendasi 1.1.2: Recommendation 1.1.2:	Keterangan: Description:	Status:
Direksi harus memastikan bahwa misi, visi, tujuan, sasaran, strategi, dan rencana tahunan dan jangka menengah korporasi konsisten dengan tujuan jangka panjang, dengan memanfaatkan inovasi dan teknologi secara efektif. The Board of Directors must ensure that the corporate mission, vision, goals, objectives, strategies, and annual as well as mid-term plans are consistent with the long-term goals, by effectively utilizing innovation and technology.	Direksi fokus pada pengembangan infrastruktur teknologi dan inovasi digital. Hal ini dilakukan guna mendukung pencapaian visi, misi, tujuan, sasaran, strategi, dan rencana jangka pendek dan jangka panjang Bank. The Board of Directors focuses on developing technology infrastructure and digital innovation. This is carried out to support the achievement of the Bank's vision, mission, goals, targets, strategies, and short-term as well as long-term plans.	Terpenuhi Complied
Rekomendasi 1.1.3: **Recommendation 1.1.3:**	**Keterangan:** **Description:**	**Status:**
Direksi memastikan bahwa korporasi menerapkan manajemen risiko dan sistem pengendalian internal yang tepat dan efektif yang selaras dengan visi, misi, tujuan, sasaran, dan strategi korporasi serta mematuhi peraturan perundang-undangan dan standar yang berlaku. The Board of Directors ensures that the corporation implements an appropriate and effective risk management and internal control system, that is aligned with the corporate vision, mission, goals, objectives, and strategies, as well as complies with applicable laws and regulations and standards.	Direksi menerapkan manajemen risiko dan SPI dengan efektif, proaktif, serta sejalan dengan ketentuan peraturan perundang-undangan dan standar yang berlaku. Hal ini bertujuan untuk mendukung pencapaian dan pertumbuhan kinerja secara berkelanjutan serta meningkatkan daya saing Bank. The Board of Directors implements risk management and SPI effectively, proactively, and in line with the applicable laws and regulations and standards. This aims to support sustainable performance achievement and growth and increase the Bank's competitiveness.	Terpenuhi Complied
Rekomendasi 1.1.4: **Recommendation 1.1.4:**	**Keterangan:** **Description:**	**Status:**
Direksi memastikan integritas akuntansi dan sistem pelaporan keuangan korporasi dan pengungkapan yang tepat waktu dan akurat atas semua informasi material mengenai korporasi. The Board of Directors ensures the integrity of corporate accounting and financial reporting system and the timely and accurate disclosure of all material information on the corporation.	Direksi memastikan integritas akuntansi dan sistem pelaporan keuangan Bank, serta pengungkapan informasi material yang tepat waktu dan akurat. Langkah ini merupakan bagian penting dari implementasi manajemen risiko Bank, yang bertujuan menjaga transparansi dan kepercayaan para pemangku kepentingan. The Board of Directors ensures the integrity of the Bank's accounting and financial reporting systems, as well as timely and accurate disclosure of material information. This step is an important part of the Bank's risk management implementation, which aims to maintain transparency and stakeholder trust.	Terpenuhi Complied
Rekomendasi 1.1.5: **Recommendation 1.1.5:**	**Keterangan:** **Description:**	**Status:**
Direksi memastikan pelaporan keberlanjutan telah disusun sebagaimana mestinya. The Board of Directors ensures that sustainability reporting has been prepared properly.	Direksi melakukan penerapan prinsip keberlanjutan serta memastikan penyusunan Laporan Keberlanjutan sesuai dengan ketentuan peraturan perundang-undangan dan standar yang berlaku. The Board of Directors implements sustainability principles and ensures that the Sustainability Report preparation is in accordance with the applicable laws and regulations and standards.	Terpenuhi Complied
Rekomendasi 1.1.6: **Recommendation 1.1.6:**	**Keterangan:** **Description:**	**Status:**
Direksi membangun kerangka kerja untuk governansi teknologi informasi korporasi yang selaras dengan kebutuhan dan prioritas bisnis korporasi, mendorong peluang dan kinerja bisnis, memperkuat manajemen risiko, serta mendukung tujuan dan strategi korporasi. The Board of Directors builds a framework for corporate information technology governance that is aligned with corporate business needs and priorities, drives business opportunities and performance, strengthens risk management, as well as supports corporate goals and strategies.	Direksi telah membangun dan secara konsisten memutakhirkan kerangka kerja governansi TI Bank agar selaras dengan kebutuhan dan prioritas bisnis Bank. Penerapan governansi TI dilakukan melalui penyelarasan rencana strategis TI Bank dengan strategi bisnis Bank, optimalisasi sumber daya, pemanfaatan TI, pengukuran kinerja, dan penerapan manajemen risiko yang efektif dengan tetap memenuhi peraturan perundang-undangan yang berlaku. The Board of Directors has built and consistently updated the Bank's IT governance framework to align it with the Bank's business needs and priorities. The IT governance is implemented through the alignment of the Bank's IT strategic plan with the Bank's business strategy, optimization of resources, utilization of IT, performance measurement, and implementation of effective risk management while still complying with applicable laws and regulations.	Terpenuhi Complied

Rekomendasi 1.1.7: Recommendation 1.1.7:	Keterangan: Description:	Status:
Bagi korporasi yang menjalankan kegiatan usaha berdasarkan prinsip syariah, Direksi perlu memastikan kewenangan dan ketersediaan perangkat pendukung yang memadai agar Dewan Pengawas Syariah dapat menjalankan perannya dengan efektif. For corporations that conduct business activities based on sharia principles, the Board of Directors needs to ensure the authority and availability of adequate supporting tools, allowing the Sharia Supervisory Board to carry out its role effectively.	Bank tidak memiliki dan menjalankan kegiatan usaha berdasarkan prinsip syariah di tahun 2024. The Bank did not have nor conduct business activities based on sharia principles in 2024.	Penjelasan Explanation
Rekomendasi 1.1.8: **Recommendation 1.1.8:**	**Keterangan:** **Description:**	**Status:**
Piagam Direksi secara periodik ditinjau. Piagam mencakup antara lain pembagian peran Direktur secara individual dapat diatur di Piagam Direksi atau dengan surat keputusan Direksi. The Board of Directors' Charter is periodically reviewed. The Charter includes, among others, the division of roles for the Directors individually, which can be regulated in the Board of Directors' Charter or by a decision letter of the Board of Directors.	*BOD Charter* dikaji secara berkala dan telah diperbarui pada tanggal 6 Desember 2023 serta diunggah ke situs web Bank (www.victoriabank.co.id). The BOD Charter is periodically reviewed, was lastly updated on 6 December 2023, and is already uploaded to the Bank's website (www.victoriabank.co.id).	Terpenuhi Complied
Rekomendasi 1.1.9: **Recommendation 1.1.9:**	**Keterangan:** **Description:**	**Status:**
Direksi mempunyai kebijakan terkait pengunduran diri anggota Direksi apabila terlibat dalam kejahatan keuangan dan terbukti melakukan kesalahan. The Board of Directors has a policy on resignation of members of the Board of Directors if involved in a financial crime and are proven to have made a mistake.	Direksi telah memiliki *BOD Charter* yang mengatur mengenai pemberhentian Direksi apabila terlibat dalam kejahatan keuangan dan terbukti melakukan kesalahan. The Board of Directors has the BOD Charter that regulates the dismissal of the Board of Directors in the event they are involved in a financial crime and are proven to have made a mistake.	Terpenuhi Complied

Rekomendasi 1.2: Penilaian Kinerja - Direksi dan Anggotanya.
Recommendation 1.2: Performance Assessment - Board of Directors and its Members.

Rekomendasi 1.2.1: Recommendation 1.2.1:	Keterangan: Description:	Status:
Dewan Komisaris melakukan evaluasi formal tahunan secara objektif dan independen untuk menentukan efektivitas Direksi dan setiap individu Direktur. The Board of Commissioners conducts an annual formal evaluation objectively and independently to determine the effectiveness of the Board of Directors and each individual Director.	Bank menerapkan kebijakan penilaian kinerja Direksi yang mencakup 2 (dua) metode, yaitu penilaian kinerja secara mandiri dan penilaian oleh Dewan Komisaris. Penilaian ini dilakukan setidaknya sekali dalam setahun untuk memastikan efektivitas kepemimpinan dan pencapaian target Bank. Informasi lebih lengkap mengenai proses dan hasil penilaian kinerja Direksi dijelaskan secara rinci dalam bagian Penilaian Kinerja Direksi pada Laporan Tahunan ini. The Bank implements the policy on Board of Directors performance assessment that includes 2 (two) methods, namely independent performance assessment and assessment by the Board of Commissioners. These assessments are carried out at least once every year to ensure the effectiveness of leadership and achievement of the Bank's targets. A more detailed information regarding the process and results of the Board of Directors' performance assessment is explained in detail in the Board of Directors' Performance Assessment section of this Annual Report.	Terpenuhi Complied
Rekomendasi 1.2.2: **Recommendation 1.2.2:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris dengan pertimbangan Komite Remunerasi dan Nominasi, bertanggung jawab menentukan kriteria evaluasi kinerja dan menilai kinerja Direktur Utama dan anggota Direksi lainnya. The Board of Commissioners, with considerations from the Remuneration and Nomination Committee, is responsible for determining performance evaluation criteria and assessing the performance of the President Director and other members of the Board of Directors.	Kriteria penilaian kinerja Direksi oleh Dewan Komisaris telah mempertimbangkan usulan Komite Remunerasi dan Nominasi. The performance assessment criteria of the Board of Directors by the Board of Commissioners have considered the recommendations of the Remuneration and Nomination Committee.	Terpenuhi Complied

Rekomendasi 1.3: Peran dan Tanggung Jawab Dewan Komisaris.
Recommendation 1.3: Roles and Responsibilities of the Board of Commissioners.

Rekomendasi 1.3.1: **Recommendation 1.3.1:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris mengkaji ulang strategi korporasi paling tidak setiap tahun dan menyetujui misi, visi dan strategi korporasi yang dirumuskan oleh Direksi. Dewan Komisaris juga mengkaji ulang, memberikan saran dan menyetujui rencana bisnis dan rencana keuangan jangka panjang dan rencana keuangan jangka pendek korporasi. Dewan Komisaris memberikan advis dan melakukan pemantauan kepada Direksi atas pengelolaan implementasinya. Direksi dan Dewan Komisaris terlibat dalam keputusan yang sangat penting bagi korporasi, diatur dalam Anggaran Dasar korporasi.	Dewan Komisaris secara rutin mengkaji ulang strategi Bank setidaknya setiap tahun, dengan memberikan persetujuan atas dokumen RBB dan Rencana Kerja dan Anggaran Perusahaan (RKAP), termasuk revisinya. Selain itu, Dewan Komisaris juga memberikan nasihat serta melakukan pemantauan terhadap implementasinya melalui rapat yang mengundang jajaran Direksi untuk membahas kinerja perusahaan. Sebagai bagian dari tanggung jawabnya, Dewan Komisaris menyusun Laporan Pengawasan RBB yang dilaporkan kepada otoritas berwenang setiap semester.	Terpenuhi
The Board of Commissioners reviews the corporate strategy at least annually and approves the corporate mission, vision, and strategy formulated by the Board of Directors. The Board of Commissioners also reviews, provides advice, and approves long-term business and financial plans and the company's short-term financial plans. The Board of Commissioners provides advice and monitors the Board of Directors on the management of its implementation. The Board of Directors and Board of Commissioners are involved in decisions deemed crucial for the corporation, as regulated in the Articles of Association of the Company.	The Board of Commissioners regularly reviews the Bank's strategy at least on an annual basis, by approving RBB and the Company's Work Plan and Budget (RKAP) documents, including their revisions. In addition, the Board of Commissioners also provides advice and monitors its implementation through meetings inviting the Board of Directors to discuss the company's performance. As part of its responsibilities, the Board of Commissioners prepares RBB Supervision Report which is reported to the competent authorities every semester.	Complied
Rekomendasi 1.3.2: **Recommendation 1.3.2:**	**Keterangan:** **Description:**	**Status:**
Jenis keputusan yang memerlukan persetujuan Dewan Komisaris harus diungkapkan dalam Laporan Tahunan.	Keputusan-keputusan yang diambil oleh Dewan Komisaris telah disampaikan pada pembahasan Dewan Komisaris di Laporan Tahunan ini.	Terpenuhi
The types of decisions that require the Board of Commissioners' approval must be disclosed in the Annual Report.	Decisions taken by the Board of Commissioners have been presented in the discussion of the Board of Commissioners in this Annual Report.	Complied
Rekomendasi 1.3.3: **Recommendation 1.3.3:**	**Keterangan:** **Description:**	**Status:**
Dengan memperhatikan rekomendasi Komite Remunerasi dan Nominasi, Dewan Komisaris mengusulkan kepada, dan untuk diputuskan oleh, RUPS pengangkatan dan/atau pemberhentian anggota Direksi dan anggota Dewan Komisaris. Dalam mengusulkan hal di atas, Dewan Komisaris memperhatikan keberagaman, unsur non-diskriminatif, dan memberikan kesempatan yang sama tanpa membedakan suku, agama, ras, antar golongan, dan gender. Dewan Komisaris memastikan proses pencalonan dan pemilihan anggota Direksi dan anggota Dewan Komisaris adalah formal dan transparan.	Sesuai dengan Pedoman Tata Tertib Komite Remunerasi dan Nominasi tanggal 5 Januari 2024 dan Kebijakan Penerapan Tata Kelola dalam Pemberian Remunerasi No. 011/SK-KOM/01/24 tanggal 17 Januari 2024, Dewan Komisaris berperan aktif dalam proses pengangkatan dan pemberhentian anggota Dewan Komisaris dan Direksi. Dalam proses nominasi, Dewan Komisaris mempertimbangkan rekomendasi dari Komite Remunerasi dan Nominasi, memastikan keberagaman dengan memberikan kesempatan yang setara tanpa membedakan suku, agama, ras, golongan, dan gender. Proses ini dijalankan secara formal dan transparan untuk menjamin integritas serta kualitas kepemimpinan di Bank.	Terpenuhi
Taking into account the recommendations from the Remuneration and Nomination Committee, the Board of Commissioners proposes to, and to be resolved by, the GMS the appointment and/or dismissal of members of the Board of Directors and members of the Board of Commissioners. In proposing the above, the Board of Commissioners pays attention to the diversity, non-discriminatory elements, and provides equal opportunities regardless of ethnicity, religion, race, class, and gender. The Board of Commissioners ensures a formal and transparent nomination and selection process for members of the Board of Directors and members of the Board of Commissioners.	Pursuant to Guidelines and Procedures of Remuneration and Nomination Committee dated 5 January 2024 and the Policy for Governance Implementation in the Provision of Remuneration No. 011/SK-KOM/01/24 dated 17 January 2024, the Board of Commissioners plays an active role in the process of appointing and dismissing members of the Board of Commissioners and Board of Directors. In the nomination process, the Board of Commissioners considers recommendations from the Remuneration and Nomination Committee, ensures diversity by providing equal opportunities regardless of ethnicity, religion, race, class, and gender. This process is carried out formally and transparently to ensure the integrity and quality of leadership at the Bank.	Complied
Rekomendasi 1.3.4: **Recommendation 1.3.4:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris atau Komite yang menjalankan fungsi nominasi menyusun kebijakan suksesi dalam proses nominasi anggota Direksi. Setiap tahun Dewan Komisaris meninjau pelaporan pelaksanaan rencana pengembangan dan suksesi yang disampaikan Direktur Utama.	Sebagai langkah untuk mempersiapkan regenerasi kepemimpinan, Bank telah menetapkan dan menjalankan kebijakan suksesi Direksi, yang merupakan bagian dari Pedoman Kerja Komite Remunerasi dan Nominasi. Kebijakan ini dirancang untuk memastikan kelanjutan kepemimpinan yang efektif dan telah disampaikan secara transparan dalam Laporan Tahunan, sebagai wujud komitmen Bank terhadap kesinambungan implementasi GCG.	Terpenuhi
The Board of Commissioners or the Committee conducting the nomination function prepares a succession policy in the process of nominating members of the Board of Directors. Every year, the Board of Commissioners reviews the report on implementation of development and succession plans submitted by the President Director.	As a step to prepare for leadership regeneration, the Bank has established and implemented a succession policy for the Board of Directors, which is part of the Remuneration and Nomination Committee Charter. This policy is designed to ensure effective leadership continuity and is presented transparently in the Annual Report, as a manifestation of the Bank's commitment to the continuity of GCG implementation.	Complied

Rekomendasi 1.3.5: **Recommendation 1.3.5:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris: 1. Mengajukan kepada RUPS, yang dapat didahului oleh usulan dari komite yang menjalankan fungsi remunerasi, besaran remunerasi anggota Direksi dan anggota Dewan Komisaris yang selaras dengan pengembangan korporasi yang berkelanjutan dan kepentingan jangka panjang korporasi dan Pemegang Saham; dan 2. Secara berkala mengkaji ulang sistem remunerasi Direksi dan Dewan Komisaris.	Komite Remunerasi dan Nominasi melakukan pembahasan atas remunerasi Dewan Komisaris dan Direksi dengan mempertimbangkan skala usaha, kompleksitas usaha, *peer group*, tingkat inflasi, kondisi dan kemampuan keuangan Bank, dan tidak bertentangan dengan peraturan perundang-undangan yang berlaku. Dewan Komisaris akan mempelajari rekomendasi dari Komite Remunerasi dan Nominasi dan mengusulkan remunerasi tersebut kepada RUPS. Selain itu, sistem remunerasi Dewan Komisaris dan Direksi ditelaah secara berkala sesuai perkembangan aktivitas Bank dan ketentuan yang berlaku.	Terpenuhi
The Board of Commissioners: 1. Submits to the GMS, which may be preceded by recommendation from the committee conducting remuneration function, the remuneration amount for members of the Board of Directors and members of the Board of Commissioners, in line with the sustainable corporate development and long-term interests of the corporation and Shareholders; and 2. Periodically reviews the remuneration system for the Board of Directors and Board of Commissioners.	The Remuneration and Nomination Committee discusses the remuneration for the Board of Commissioners and Board of Directors by considering the business scale, business complexity, peer group, inflation rate, the Bank's financial condition and capability, and not having any conflict with applicable laws and regulations. The Board of Commissioners will study the recommendations from the Remuneration and Nomination Committee and propose the remuneration to the GMS. In addition, the remuneration system of the Board of Commissioners and Board of Directors is reviewed periodically in accordance with the development of the Bank's activities and applicable regulations.	Complied
Rekomendasi 1.3.6: **Recommendation 1.3.6:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris mengawasi efektivitas kebijakan governansi korporat dan implementasinya serta mengusulkan perubahan jika diperlukan.	Dewan Komisaris baik secara langsung atau melalui komite-komite senantiasa mengawasi dan mengarahkan kebijakan dan efektivitas penerapan tata kelola serta memberikan masukan dan perbaikan jika diperlukan.	Terpenuhi
The Board of Commissioners oversees the effectiveness of corporate governance policies and their implementation and proposes changes if necessary.	The Board of Commissioners, either directly or through committees, always supervises and directs the policies and effectiveness of governance implementation and provides input and improvements if necessary.	Complied
Rekomendasi 1.3.7: **Recommendation 1.3.7:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris memantau dan mengarahkan agar korporasi menerapkan manajemen risiko dan sistem pengendalian internal yang tepat dan efektif yang selaras dengan tujuan, sasaran, dan strategi korporasi serta mematuhi peraturan perundang-undangan, kode perilaku, dan standar yang berlaku.	Dewan Komisaris telah melaksanakan pemantauan dan pengawasan dengan memberikan saran serta nasihat kepada Direksi melalui serangkaian pertemuan. Pertemuan ini membahas penerapan manajemen risiko di Bank serta pelaksanaan SPI, memastikan kedua aspek tersebut dijalankan secara efektif dan sesuai dengan prinsip tata kelola yang baik.	Terpenuhi
The Board of Commissioners monitors and directs the corporation to implement appropriate and effective risk management and internal control systems that are aligned with the corporate goals, objectives, and strategies, as well as complying with applicable laws and regulations, codes of conduct, and standards.	The Board of Commissioners has carried out monitoring and supervision by providing advice and counseling to the Board of Directors through a series of meetings. This meeting discusses risk management implementation at the Bank and SPI implementation, ensuring that both aspects are carried out effectively and in accordance with good governance principles.	Complied
Rekomendasi 1.3.8: **Recommendation 1.3.8:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris mengawasi dan mengarahkan agar tercapai integritas akuntansi dan sistem pelaporan keuangan korporat, serta independensi fungsi audit internal dan eksternal.	Dewan Komisaris telah berdiskusi dengan Direksi mengenai penunjukan kantor akuntan publik untuk mengaudit Laporan Keuangan Tahunan, serta membahas rencana audit Bank guna memastikan integritas akuntansi, keandalan sistem pelaporan keuangan, dan menjaga independensi fungsi audit internal maupun eksternal.	Terpenuhi
The Board of Commissioners supervises and directs the integrity of the corporate accounting and financial reporting system, as well as the independence of internal and external audit functions.	The Board of Commissioners has discussed with the Board of Directors regarding the appointment of public accounting firm to audit the Annual Financial Report, as well as discussed the Bank's audit plan to ensure accounting integrity, reliability of financial reporting system, and maintain the independency of internal and external audit functions.	Complied
Rekomendasi 1.3.9: **Recommendation 1.3.9:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris memantau, mengkaji ulang, dan menyetujui Laporan Tahunan dan Laporan Keberlanjutan korporasi serta memastikan integritasnya, serta mengawasi proses pengungkapan dan pengkomunikasian korporasi.	Dewan Komisaris telah memantau, dan menelaah Laporan Tahunan yang disusun Bank, termasuk memastikan untuk mencantumkan informasi mengenai Dewan Komisaris yang harus dicantumkan dalam Laporan Tahunan.	Terpenuhi
The Board of Commissioners monitors, reviews, and approves the Annual Report and Sustainability Report of the corporation, ensures their integrity, and oversees the corporation's disclosure and communication process.	The Board of Commissioners has monitored and reviewed the Annual Report prepared by the Bank, including in ensuring to include information on the Board of Commissioners that must be included in the Annual Report.	Complied

Rekomendasi 1.3.10: Recommendation 1.3.10:	Keterangan: Description:	Status:
Piagam Dewan Komisaris secara periodik ditinjau.	*BOC Charter* dikaji secara berkala dan telah diperbarui pada tanggal 6 Desember 2023 serta diunggah ke situs web Bank (www.victoriabank.co.id).	Terpenuhi
The Board of Commissioners Charter is periodically reviewed.	The BOC Charter is periodically reviewed, was lastly updated on 6 December 2023, and is already uploaded to the Bank's website (www.victoriabank.co.id).	Complied
Rekomendasi 1.3.11: **Recommendation 1.3.11:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris mempunyai kebijakan terkait pengunduran diri anggota Dewan Komisaris apabila terlibat dalam kejahatan keuangan dan terbukti melakukan kesalahan.	Dewan Komisaris telah memiliki *BOC Charter* yang mengatur mengenai pemberhentian Dewan Komisaris apabila terlibat dalam kejahatan keuangan dan terbukti melakukan kesalahan.	Terpenuhi
The Board of Commissioners has a policy on resignation of members of the Board of Commissioners if involved in a financial crime and are proven to have made a mistake.	The Board of Commissioners has the BOC Charter that regulates the dismissal of the Board of Commissioners in the event they are involved in a financial crime and are proven to have made a mistake.	Complied
Rekomendasi 1.3.12: **Recommendation 1.3.12:**	**Keterangan:** **Description:**	**Status:**
Komisaris independen sangat diharapkan untuk dapat berkontribusi dalam diskusi yang jujur, objektif, aktif, dan konstruktif pada rapat Dewan Komisaris.	Seluruh Komisaris Independen tidak memiliki hubungan keuangan, kepengurusan, kepemilikan saham, dan/atau hubungan keluarga dengan anggota Direksi, anggota Dewan Komisaris lain dan/atau Pemegang Saham Pengendali, atau hubungan dengan Bank yang dapat memengaruhi kemampuan yang bersangkutan untuk bertindak independen. Independensi tersebut menunjukkan objektivitas Komisaris Independen dalam menjalankan tugas, untuk berperan aktif, objektif, dan konstruktif dalam menjalankan fungsinya.	Terpenuhi
Independent commissioners are highly expected to be able to contribute to honest, objective, active, and constructive discussions at the Board of Commissioners' meetings.	All of the Independent Commissioners have no financial, management, share ownership, and/or family relationships with members of Board of Directors, other members of Board of Commissioners, and/or Controlling Shareholders, or relationships with the Bank that could affect their ability to act independently. This independency demonstrates Independent Commissioners' objectivity to carry out their duties and to play an active, objective, and constructive roles in performing their functions.	Complied
Rekomendasi 1.3.13: **Recommendation 1.3.13:**	**Keterangan:** **Description:**	**Status:**
Komisaris Utama berperan sebagai koordinator Dewan Komisaris dan memastikan efektivitasnya. Komisaris Utama mendorong budaya keterbukaan dan dialog konstruktif yang memungkinkan berbagai pandangan diungkapkan, termasuk mengoordinasi penetapan agenda rapat dewan yang tepat dan memastikan waktu yang cukup tersedia untuk mendiskusikan semua agenda. Selain itu, juga harus ada kesempatan bagi Dewan Komisaris untuk bertemu dengan jajaran Direksi dan Manajemen Senior.	Komisaris Utama telah menjalankan fungsinya secara optimal, baik dalam perannya sebagai koordinator Dewan Komisaris dalam memastikan efektivitas tugas dan tanggung jawab Dewan Komisaris. Peran aktif Komisaris Utama ditunjukan dalam memimpin rapat Dewan Komisaris sesuai agenda-agenda yang wajib dibahas, hingga pengambilan keputusan secara kolegial.	Terpenuhi
The President Commissioner acts as the coordinator of the Board of Commissioners and ensures its effectiveness. The President Commissioner promotes a culture of transparency and constructive dialogue that allows a variety of views to be expressed, including coordinating the setting of appropriate board meeting agenda and ensuring sufficient time is available to discuss all agenda items. In addition, there should be opportunities for the Board of Commissioners to meet with the Board of Directors and Senior Management.	The President Commissioner has carried out the functions optimally, both in the role as the coordinator of the Board of Commissioners and in ensuring the effectiveness of Board of Commissioners' duties and responsibilities. The active roles of President Commissioner are shown in leading the Board of Commissioners meeting according to the agenda items that must be discussed, up to making decisions collegially.	Complied
Rekomendasi 1.4: Pembentukan Komite. **Recommendation 1.4: Establishment of a Committee.**		
Rekomendasi 1.4.1: **Recommendation 1.4.1:**	**Keterangan:** **Description:**	**Status:**
Korporasi memiliki komite-komite di bawah Dewan Komisaris sekurang-kurangnya terdiri dari: Komite Audit, Komite Remunerasi dan Nominasi, dan Komite Pemantau Manajemen Risiko.	Dewan Komisaris telah membentuk komite-komite di bawah Dewan Komisaris yang terdiri dari Komite Pemantau Risiko, Komite Remunerasi dan Nominasi, dan Komite Audit.	Terpenuhi
The Corporation has committees under the Board of Commissioners, consisting of at least: Audit Committee, Remuneration and Nomination Committee, and Risk Management Monitoring Committee.	The Board of Commissioners has established committees under the Board of Commissioners consisting of Risk Monitoring Committee, Remuneration and Nomination Committee, and Audit Committee.	Complied

Rekomendasi 1.4.2: Recommendation 1.4.2:	Keterangan: Description:	Status:
Dewan Komisaris memastikan bahwa anggota Komite Audit seluruhnya independen dan komite lain yang dibentuk Dewan Komisaris adalah mayoritas dari pihak independen, serta semua anggota komite memiliki kompetensi, berkomitmen, serta memiliki wewenang yang memadai untuk menjalankan perannya secara efektif dan independen.	Dewan Komisaris telah memastikan bahwa seluruh anggota Komite Audit adalah pihak-pihak yang independen, mencakup Komisaris Independen, dan pihak independen (Non-Komisaris) yang kompetensi dan kapabilitasnya telah sesuai dengan kebutuhan pelaksanaan tugas Komite Audit, dan dipastikan pelaksanaan tugas dilaksanakan secara efektif dan independen.	Terpenuhi
The Board of Commissioners ensures that all Audit Committee's members are independent, and majority of members of other committees established by the Board of Commissioners are independent parties, and that all committee members are competent, committed, and have sufficient authority to perform their roles in an effective and independent manner.	The Board of Commissioners has ensured that all Audit Committees' members are independent parties, including Independent Commissioners and independent parties (Non-Commissioners) whose competence and capabilities are in accordance with the needs of Audit Committee's duties, and ensured that its duties are carried out effectively and independently.	Complied
Rekomendasi 1.4.3: **Recommendation 1.4.3:**	**Keterangan:** **Description:**	**Status:**
Untuk memastikan pemantauan atas pelaksanaan tugas Komite Audit berjalan objektif dan independen, Komisaris Utama tidak boleh menjadi ketua Komite Audit, kecuali dalam keadaan luar biasa yang harus dijelaskan dalam Laporan Tahunan.	Ketua Komite Audit dijabat oleh Bapak Zaenal Abidin Ph.D yang merupakan Komisaris Utama. Meski demikian, Bapak Zaenal Abidin Ph.D merupakan Komisaris Utama Independen dan Bank menjamin independensinya dalam melaksanakan tugas dan tanggung jawabnya sebagai Ketua Komite Audit.	Penjelasan
To ensure objective and independent monitoring on the implementation of Audit Committee's duties, the President Commissioner is not allowed to be the chairman of Audit Committee, except in exceptional circumstances which must be explained in the Annual Report.	The Chairman of Audit Committee is held by Mr. Zaenal Abidin Ph.D the President Commissioner. Nevertheless, Mr. Zaenal Abidin Ph.D is an Independent President Commissioner and the Bank guarantees his independence in performing his duties and responsibilities as the Chairman of Audit Committee.	Explanation
Rekomendasi 1.5: Penilaian Kinerja – Dewan Komisaris dan Anggotanya. **Recommendation 1.5: Performance Assessment – Board of Commissioners and its Members.**		
Rekomendasi 1.5.1: **Recommendation 1.5.1:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris melakukan evaluasi formal tahunan secara objektif untuk menentukan efektivitas Dewan, komitenya, dan setiap individu Komisaris.	Pelaksanaan penilaian kinerja Dewan Komisaris dan komitenya dilakukan setiap tahun (minimum setahun sekali). Penilaian kinerja Dewan Komisaris dan komitenya menggunakan beberapa kriteria sebagaimana yang tertuang dalam Laporan Tahunan ini.	Terpenuhi
The Board of Commissioners conducts an annual formal evaluation objectively to determine the effectiveness of the Board, its committees, and each individual Commissioner.	The performance assessment of the Board of Commissioners and its committees is carried out every year (at least once a year). The performance assessment of the Board of Commissioners and its committees uses several criteria as stated in this Annual Report.	Complied
Rekomendasi 1.6: Benturan Kepentingan. **Recommendation 1.6: Conflict of Interest.**		
Rekomendasi 1.6.1: **Recommendation 1.6.1:**	**Keterangan:** **Description:**	**Status:**
Anggota Direksi yang mempunyai rangkap jabatan di luar korporasi, harus mendapatkan persetujuan dari Dewan Komisaris. Seorang Komisaris memberi tahu Dewan Komisaris dan ketua komite yang menjalankan fungsi nominasi, sebelum menerima penunjukan baru sebagai Direktur atau Komisaris dari korporasi terbuka, jabatan Direktur lainnya atau posisi lain dengan komitmen waktu yang signifikan.	Tidak terdapat Direksi yang memiliki rangkap jabatan.	Terpenuhi
Members of the Board of Directors with concurrent positions outside the corporation must obtain approval from the Board of Commissioners. A Commissioner shall notify the Board of Commissioners and the chairman of committee performing nominating function, prior to accepting a new appointment as Director or Commissioner of a publicly listed corporation, other Director positions, or other positions with a significant time commitment.	There are no Board of Directors with concurrent positions.	Complied

Rekomendasi 1.6.2: Recommendation 1.6.2:	Keterangan: Description:	Status:
Dewan Komisaris memantau dan mengelola potensi benturan kepentingan manajemen, anggota Direksi, Dewan Komisaris dan Pemegang Saham, termasuk penyalahgunaan aset korporasi dan penyalahgunaan dalam transaksi pihak berelasi. Komisaris yang memiliki benturan kepentingan tidak turut serta dalam pemantauan dan pengambilan keputusan atas potensi benturan kepentingan yang melibatkan Komisaris atau afiliasi Komisaris yang bersangkutan.	Dewan Komisaris telah memantau dan mengelola potensi benturan kepentingan Bank. Dalam pelaksanaan tugas dan tanggung jawabnya, seluruh anggota Dewan Komisaris berkomitmen untuk menghindari terjadinya potensi benturan kepentingan atau selalu menempatkan diri untuk tidak berada dalam potensi terjadinya benturan kepentingan dalam situasi apapun sebagaimana tercantum dalam *BOC Charter*. Dalam hal terjadi benturan kepentingan, anggota Dewan Komisaris dilarang mengambil tindakan yang dapat merugikan atau mengurangi keuntungan Bank dan wajib mengungkapkan potensi benturan kepentingan dimaksud dalam setiap keputusan.	Terpenuhi
The Board of Commissioners monitors and manages potential conflicts of interest within the management, members of the Board of Directors, Board of Commissioners, and Shareholders, including misuse of corporate assets and misuse of related party transactions. Commissioners with conflicts of interest shall not participate in monitoring and making decisions on matters containing potential conflicts of interest involving the Commissioners or affiliates of the Commissioner concerned.	The Board of Commissioners has monitored and managed potential conflicts of interest within the Bank. In performing their duties and responsibilities, all members of the Board of Commissioners are committed to avoiding potential conflicts of interest or always position themselves not to be involved in any situation containing potential conflicts of interest as stated in the BOC Charter. In the event of a conflict of interest, members of the Board of Commissioners are prohibited from taking actions that may harm or reduce the Bank's profits and must disclose the potential conflict of interest referred to in every decision.	Complied

Rekomendasi 1.7: Peningkatan Kompetensi Anggota Direksi dan Dewan Komisaris.
Recommendation 1.7: Competency Improvement of Members of the Board of Directors and Board of Commissioners.

Rekomendasi 1.7.1: Recommendation 1.7.1:	Keterangan: Description:	Status:
Dewan Komisaris memastikan bahwa anggota Direksi dan Dewan Komisaris memahami peran dan tanggung jawab mereka, karakteristik dan operasi korporasi, peraturan perundang-undangan dan standar yang relevan serta kewajiban lain yang berlaku. Direksi melalui Sekretaris Korporasi mendukung semua anggota Direksi dan Dewan Komisaris dalam memperbarui dan menyegarkan keterampilan dan pengetahuan mereka yang diperlukan untuk menjalankan peran mereka di Dewan.	Dewan Komisaris dan Direksi sebelum menjalankan tugas dan fungsinya sebagai Dewan Komisaris dan/atau Direksi telah mengikuti rangkaian kegiatan induksi untuk memastikan pemahaman atas tugas dan tanggung jawab masing-masing sesuai regulasi. Secara berkala, Dewan Komisaris dan Direksi juga mengikuti kegiatan pengembangan kompetensi yang menunjang pelaksanaan tugas dan tanggung jawab dalam memperbarui dan menyegarkan keterampilan dan pengetahuan yang diperlukan untuk menjalankan peran masing-masing.	Terpenuhi
The Board of Commissioners ensures that members of the Board of Directors and Board of Commissioners understand their roles and responsibilities, characteristics and operations of the corporation, relevant laws and regulations, and other applicable standards and obligations. The Board of Directors, through the Corporate Secretary, supports all members of the Board of Directors and Board of Commissioners in updating and refreshing the required skills and knowledge to perform their roles on the Board.	The Board of Commissioners and Board of Directors, prior to carrying out their duties and functions as the Board of Commissioners and/or Board of Directors, have attended a series of induction activities to ensure their understanding of respective duties and responsibilities in accordance with regulations. Periodically, the Board of Commissioners and Board of Directors also attend competency development activities that support the implementation of duties and responsibilities in updating and refreshing the required skills and knowledge to perform their respective roles.	Complied

Prinsip 2: Komposisi dan Remunerasi Direksi dan Dewan Komisaris
Principle 2: Composition and Remuneration of the Board of Directors and Board of Commissioners

Rekomendasi 2.1: Komposisi Direksi dan Dewan Komisaris.
Recommendation 2.1: Composition of the Board of Directors and Board of Commissioners.

Rekomendasi 2.1.1: Recommendation 2.1.1:	Keterangan: Description:	Status:
Dalam menentukan kandidat calon Direktur, Dewan Komisaris melalui Komite Remunerasi dan Nominasi tidak hanya mengandalkan rekomendasi dari Dewan Komisaris, manajemen atau Pemegang Saham mayoritas. Dewan Komisaris melalui Komite Remunerasi dan Nominasi dapat menggunakan sumber independen untuk menentukan kandidat yang memenuhi syarat.	Saat ini, Bank belum menggunakan jasa pihak ketiga yang independen dalam proses seleksi kandidat Dewan Komisaris. Meskipun demikian, Bank senantiasa memastikan penentuan kandidat calon Dewan Komisaris dan Direksi sesuai dengan aturan yang berlaku dan kualifikasi yang dibutuhkan oleh Bank.	Penjelasan
In determining Director candidates, the Board of Commissioners, through the Remuneration and Nomination Committee, does not rely solely on recommendations from the Board of Commissioners, management, or majority shareholders. The Board of Commissioners, through the Remuneration and Nomination Committee, may use independent sources to determine qualified candidates.	Currently, the Bank has not used the services of an independent third party in the selection process of Board of Commissioners candidates. Nevertheless, the Bank always ensures that the selection of candidates for the Board of Commissioners and Board of Directors is in accordance with applicable regulations and the qualifications required by the Bank.	Explanation

Rekomendasi 2.1.2: Recommendation 2.1.2:	Keterangan: Description:	Status:
Dewan Komisaris memastikan bahwa kriteria dalam menyeleksi anggota Direksi mencakup paling tidak pengetahuan, kemampuan, dan keahlian yang dibutuhkan untuk memenuhi secara tepat peran Direksi serta memperhatikan terpenuhinya keberagaman Direksi. The Board of Commissioners ensures that the criteria for selecting members of the Board of Directors include at least the required knowledge, abilities, and expertise to properly meet the role of the Board of Directors and pay attention to the fulfillment of the Board of Directors' diversity.	Melalui Komite Remunerasi dan Nominasi, Dewan Komisaris menyeleksi kandidat Direksi yang sesuai dengan kriteria yang telah ditetapkan. Through Remuneration and Nomination Committee, the Board of Commissioners selects candidates for Board of Directors who meet the established criteria.	Terpenuhi Complied
Rekomendasi 2.1.3: **Recommendation 2.1.3:**	**Keterangan:** **Description:**	**Status:**
Kebijakan korporasi tentang keberagaman pada Direksi dan Dewan Komisaris diungkapkan dalam Laporan Tahunan. The corporate policy on diversity in the Board of Directors and Board of Commissioners is disclosed in the Annual Report.	Kebijakan Bank tentang keberagaman Dewan Komisaris dan Direksi telah diungkapkan dalam Laporan Tahunan ini. The Bank's policy on diversity of the Board of Commissioners and Board of Directors has been disclosed in this Annual Report.	Terpenuhi Complied
Rekomendasi 2.1.4: **Recommendation 2.1.4:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris memastikan bahwa kebijakan dan prosedur untuk seleksi dan nominasi Komisaris adalah jelas dan transparan sehingga dapat menghasilkan komposisi Dewan yang diinginkan. Dewan Komisaris menggunakan sumber independen untuk menentukan kandidat yang memenuhi syarat. The Board of Commissioners ensures that the policies and procedures for the selection and nomination of Commissioners are clear and transparent so as to produce the desired Board composition. The Board of Commissioners uses independent sources to determine qualified candidates.	Dewan Komisaris, bersama dengan Komite Remunerasi dan Nominasi, telah menjalankan fungsi dan tanggung jawabnya dalam memastikan bahwa proses nominasi dan remunerasi di Bank berjalan secara transparan dan akurat. Langkah ini diambil untuk memastikan kepentingan Bank tetap terjaga, sekaligus mendukung tata kelola yang adil dan berintegritas dalam pengelolaan sumber daya manusia. The Board of Commissioners, together with the Remuneration and Nomination Committee, has performed its functions and responsibilities in ensuring that the nomination and remuneration process at the Bank runs transparently and accurately. This step was taken to ensure that the Bank's interests are maintained, while supporting fair and integrity-based governance in human capital management.	Terpenuhi Complied
Rekomendasi 2.1.5: **Recommendation 2.1.5:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris/Komite yang menjalankan fungsi nominasi menetapkan prosedur dan kriteria nominasi yang konsisten dengan matriks keahlian Dewan Komisaris yang telah disetujui Dewan Komisaris dan memastikan bahwa profil kandidat memenuhi persyaratan yang ditetapkan dalam matriks keahlian dan kriteria nominasi. The Board of Commissioners/Committee that performs the nomination function establishes nomination procedures and criteria, which are consistent with the Board of Commissioners' expertise matrix, which has been approved by the Board of Commissioners, and ensures that the candidate profile meets the established requirements in the expertise matrix and nomination criteria.	Komite Remunerasi dan Nominasi menjalankan fungsi nominasi berdasarkan prosedur dan kriteria nominasi yang tertuang dalam Pedoman dan Tata Tertib Komite Remunerasi dan Nominasi No. 001/SK-KOM/01/24 tanggal 5 Januari 2024, Kebijakan Penerapan Tata Kelola dalam Pemberian Remunerasi No. 011/SK-KOM/01/24 tanggal 17 Januari 2024 dan disetujui oleh Dewan Komisaris. The Remuneration and Nomination Committee carries out its nomination function based on the nomination procedures and criteria set out in the Guidelines and Procedures of Remuneration and Nomination Committee No. 001/SK-KOM/01/24 dated 5 January 2024, Policy on Governance Implementation in the Provision of Remuneration No. 011/SK-KOM/01/24 dated 17 January 2024 and approved by the Board of Commissioners.	Terpenuhi Complied
Rekomendasi 2.1.6: **Recommendation 2.1.6:**	**Keterangan:** **Description:**	**Status:**
Komposisi Dewan Komisaris harus dibentuk sedemikian rupa sehingga anggota-anggotanya secara kelompok mencerminkan keberagaman dalam hal kemampuan, keahlian, pengetahuan, pengalaman, usia, latar belakang budaya, dan gender yang dibutuhkan untuk memenuhi secara tepat peran Dewan Komisaris. The Board of Commissioners' composition must be formed in such a way that its members as a group reflect the diversity in terms of abilities, skills, knowledge, experience, age, cultural background, and gender required to properly fulfill the roles of the Board of Commissioners.	Keberagaman komposisi Dewan Komisaris Bank yang diterapkan telah selaras dengan amanah Otoritas Jasa Keuangan yang tertuang di dalam rekomendasi Otoritas Jasa Keuangan yang Ketentuan tentang keberagaman komposisi Dewan Komisaris dan Direksi telah dimuat dalam Lampiran Surat Edaran Otoritas Jasa Keuangan No. 32/SEOJK.04/2015 tentang Pedoman Tata Kelola Perusahaan Terbuka. The diversity in the composition of the Bank's Board of Commissioners implemented is in line with the mandate of Financial Services Authority as stated in the Financial Services Authority's recommendations, and Provision on diversity in composition of the Board of Commissioners and Board of Directors is set out in the Attachment to Financial Services Authority Circular No. 32/SEOJK.04/2015 on Governance Guidelines for Public Companies.	Terpenuhi Complied

Rekomendasi 2.1.7: Recommendation 2.1.7:	Keterangan: Description:	Status:
Untuk memampukan Dewan Komisaris dalam memberikan advis dan supervisi secara independen kepada Direksi dan untuk peran-peran yang terdapat potensi benturan kepentingan, Dewan Komisaris terdiri dari Komisaris Independen yang cukup jumlahnya, dengan masa jabatan yang dibatasi dan terdapat pengungkapan jangka waktu keanggotaan Dewan Komisaris serta independensi mereka dari sudut pandang korporasi.	Dewan Komisaris telah memiliki jumlah Komisaris Independen yang telah sesuai dengan peraturan perundang-undangan yang berlaku. Informasi lengkap terkait hal tersebut telah dipublikasikan dalam Laporan Tahunan ini.	Terpenuhi
To enable the Board of Commissioners to provide independent advice and supervision to the Board of Directors and for roles with potential conflicts of interest, the Board of Commissioners shall consist of a sufficient number of Independent Commissioners, with a limited term of office and disclosure of the term of office of the Board of Commissioners and their independence from a corporate perspective.	The Board of Commissioners has a number of Independent Commissioners that is in accordance with applicable laws and regulations. Complete information related to this matter has been published in this Annual Report.	Complied
Rekomendasi 2.1.8: **Recommendation 2.1.8:**	**Keterangan:** **Description:**	**Status:**
Untuk memfasilitasi fungsi Direksi dan Dewan Komisaris yang efektif dan guna meningkatkan kepercayaan investor dan pemangku kepentingan, Komite Remunerasi dan Nominasi memastikan bahwa terdapat proses yang formal, ketat, dan transparan untuk penunjukan dan pengangkatan anggota Direksi dan Dewan Komisaris.	Komite Remunerasi dan Nominasi telah melakukan fungsi dan tanggung jawabnya dalam memastikan proses nominasi dan remunerasi di Bank berjalan dengan benar dan transparan demi kepentingan Bank. Hal ini bisa dilihat pada pembahasan di Laporan Tahunan ini.	Terpenuhi
To facilitate effective function of the Board of Directors and Board of Commissioners and to increase investors and stakeholders trust, the Remuneration and Nomination Committee ensures that there is a formal, rigorous, and transparent process for the selection and appointment of members of the Board of Directors and Board of Commissioners.	The Remuneration and Nomination Committee has performed its functions and responsibilities in ensuring that the nomination and remuneration process at the Bank runs properly and transparently in the interests of the Bank. This matter can be seen in the discussion in this Annual Report.	Complied

Rekomendasi 2.2: Remunerasi Direksi dan Dewan Komisaris.
Recommendation 2.2: Remuneration of the Board of Directors and Board of Commissioners.

Rekomendasi 2.2.1: Recommendation 2.2.1:	Keterangan: Description:	Status:
Kebijakan remunerasi anggota Direksi terdiri atas struktur remunerasi yang berorientasi pada pengembangan korporasi yang berkelanjutan dan mendorong pencapaian tujuan jangka panjang. Remunerasi Direksi harus diusulkan, dapat dengan melalui Komite Remunerasi dan Nominasi, oleh Dewan Komisaris untuk diputuskan oleh RUPS. Jumlah remunerasi yang diusulkan kepada RUPS tersebut ditetapkan dengan mempertimbangkan peran setiap anggota Direksi dan situasi ekonomi serta kinerja korporasi.	Bank memiliki dan menjalankan Kebijakan Penerapan Tata Kelola dalam Pemberian Remunerasi sesuai Keputusan Direksi No. 011/SK-DIR/01/24 tanggal 17 Januari 2024. Kebijakan remunerasi Bank disusun dengan mengedepankan sistem remunerasi yang kompetitif, adil dan seimbang, berdasarkan peraturan perundang-undangan yang berlaku dan dikaji ulang secara berkala.	Terpenuhi
The remuneration policy for the Board of Directors' members consists of a remuneration structure that is oriented towards sustainable corporate development and encourages the achievement of long-term goals. The Board of Directors' remuneration must be proposed, possibly through the Remuneration and Nomination Committee, by the Board of Commissioners to be resolved by the GMS. The remuneration amount proposed to the GMS is determined by considering the role of each member of the Board of Directors, the economic situation, and the corporate performance.	The Bank has and implements the Policy on Governance Implementation in the Provision of Remuneration in accordance with the Board of Directors' Decision Letter No. 011/SK-DIR/01/24 dated 17 January 2024. The Bank's remuneration policy is prepared by prioritizing a competitive, fair and balanced remuneration system, based on applicable laws and regulations and is reviewed periodically.	Complied
Rekomendasi 2.2.2: **Recommendation 2.2.2:**	**Keterangan:** **Description:**	**Status:**
Kebijakan remunerasi anggota Dewan Komisaris terdiri atas struktur remunerasi yang berorientasi pada pengembangan korporasi yang berkelanjutan dan mendorong pencapaian tujuan jangka panjang. Jumlah remunerasi yang diusulkan Dewan Komisaris kepada RUPS tersebut ditetapkan dengan mempertimbangkan peran setiap anggota Dewan Komisaris dan situasi ekonomi serta kinerja korporasi. Di samping itu juga harus dipertimbangkan posisinya sebagai Komisaris Utama dan ketua serta keanggotaannya dalam komite-komite.	Bank menyusun struktur, kebijakan, dan besaran remunerasi masing-masing anggota Dewan Komisaris dengan memperhatikan tugas, wewenang, kinerja, dan tanggung jawab Dewan Komisaris. Bank juga memperhatikan remunerasi yang berlaku di industri sejenis (*peers group*) dan kemampuan Bank.	Terpenuhi
The remuneration policy for the Board of Commissioners' members consists of a remuneration structure that is oriented towards sustainable corporate development and encourages the achievement of long-term goals. The remuneration amount proposed by the Board of Commissioners to the GMS is determined by considering the role of each member of the Board of Commissioners, the economic situation, and the corporate performance. In addition, it must also consider his/her position as President Commissioner and chairman as well as membership in committees.	The Bank prepares the structure, policies, and remuneration amount for each member of the Board of Commissioners by considering duties, authorities, performance, and responsibilities of the Board of Commissioners. The Bank also pays attention to the remuneration that applies in similar industries (peer groups) as well as the Bank's capabilities.	Complied

Rekomendasi 2.2.3: Recommendation 2.2.3:	Keterangan: Description:	Status:
Untuk memastikan bahwa paket remunerasi ditentukan berdasarkan prestasi, kualifikasi, dan kompetensi Direktur dan Komisaris dengan memperhatikan kinerja operasi korporasi, kinerja individu dan kondisi pasar, Komite Remunerasi dan Nominasi memastikan bahwa terdapat prosedur yang adil dan transparan untuk menetapkan kebijakan remunerasi anggota Direksi dan Dewan Komisaris.	Komite Remunerasi dan Nominasi melakukan pembahasan atas remunerasi Dewan Komisaris dengan mempertimbangkan skala usaha, kompleksitas usaha, *peer group*, tingkat inflasi, kondisi dan kemampuan keuangan Bank, dan sesuai dengan peraturan yang berlaku. Selanjutnya, remunerasi Dewan Komisaris dan Direksi ditetapkan oleh RUPS.	Terpenuhi
To ensure that the remuneration package is determined based on the achievements, qualifications, and competencies of the Directors and Commissioners by considering the corporate operational performance, individual performance, and market conditions, the Remuneration and Nomination Committee ensures that there are fair and transparent procedures for establishing remuneration policies for members of the Board of Directors and Board of Commissioners.	The Remuneration and Nomination Committee discusses the remuneration for the Board of Commissioners by considering the business scale, business complexity, peer group, inflation rate, financial condition and capability of the Bank, and in accordance with applicable regulations. Furthermore, the remuneration for the Board of Commissioners and Board of Directors is determined by the GMS.	Complied

Prinsip 3: Hubungan Kerja Antara Direksi dan Dewan Komisaris
Principle 3: Working Relationship Between the Board of Directors and Board of Commissioners

Rekomendasi 3.1: Sifat Hubungan Kerja.
Recommendation 3.1: Nature of Working Relationship.

Rekomendasi 3.1.1: Recommendation 3.1.1:	Keterangan: Description:	Status:
Terdapat diskusi yang terbuka antara Direksi dengan Dewan Komisaris serta di antara para anggota Direksi dan para anggota Dewan Komisaris. Namun, tetap penting menjaga kerahasiaan informasi agar tidak terjadi kebocoran informasi rahasia.	Dewan Komisaris dan Direksi secara sinergis bekerja sama dalam merumuskan visi, misi, dan strategi Bank melalui rapat serta forum dan pertemuan lainnya.	Terpenuhi
There are open discussions between the Board of Directors and the Board of Commissioners as well as among members of the Board of Directors and members of the Board of Commissioners. However, it remains important to maintain the confidentiality of information to avoid leakage of confidential information.	The Board of Commissioners and Board of Directors synergistically work together in formulating the Bank's vision, mission, and strategy through meetings and other forums and meetings.	Complied
Rekomendasi 3.1.2: **Recommendation 3.1.2:**	**Keterangan:** **Description:**	**Status:**
Sesuai dengan tugas dan perannya masing-masing, Direksi bekerja sama dengan Dewan Komisaris dalam merumuskan misi, visi, dan strategi korporasi dan secara reguler membahas pengimplementasiannya.	Setiap tahun, strategi dan kebijakan Bank dalam jangka pendek dan menengah disusun dalam bentuk RBB sesuai dengan Visi dan Misi yang telah ditetapkan. Secara berkala, Direksi bersama Dewan Komisaris beserta jajaran manajemen senior Bank melakukan evaluasi berkala terhadap strategi dan kebijakan Bank serta implementasinya di seluruh level organisasi.	Terpenuhi
In accordance with their respective duties and roles, members of the Board of Directors cooperate with those of the Board of Commissioners in formulating corporate missions, visions, and strategies, and regularly discuss their implementation.	Every year, the Bank's strategy and policies in the short and medium term are prepared in the form of RBB in accordance with the established Vision and Mission. Periodically, the Board of Directors, together with the Board of Commissioners along with the Bank's senior management, evaluates the Bank's strategy and policies and their implementation at all levels of the organization.	Complied
Rekomendasi 3.1.3: **Recommendation 3.1.3:**	**Keterangan:** **Description:**	**Status:**
Sekretaris Korporasi memiliki peran penting dalam mendukung efektivitas hubungan kerja antara Direksi dengan Dewan Komisaris, mendorong implementasi praktik governansi korporat yang baik, termasuk komunikasi yang efektif dengan Pemegang Saham dan pemangku kepentingan lainnya.	Bapak Caprie Ardira Azhar selaku Kepala Divisi *Corporate Secretary* memiliki peranan strategis dalam mendukung efektivitas hubungan kerja antara Direksi dan Dewan Komisaris, serta secara aktif mendorong implementasi praktik tata kelola korporat yang baik, termasuk komunikasi dengan Pemegang Saham serta pemangku kepentingan lainnya.	Terpenuhi
The Corporate Secretary has a crucial role in supporting the effectiveness of working relationship between the Board of Directors and the Board of Commissioners, encouraging the implementation of good corporate governance practices, including effective communication with Shareholders and other stakeholders.	Mr. Caprie Ardira Azhar as Head of Corporate Secretary Division has a strategic role in supporting the effectiveness of the working relationship between the Board of Directors and the Board of Commissioners, as well as actively encouraging the implementation of good corporate governance practices, including communication with Shareholders and other stakeholders.	Complied

Rekomendasi 3.2: Akses informasi Dewan Komisaris.
Recommendation 3.2: Access to Information for the Board of Commissioners.

Rekomendasi 3.2.1: Recommendation 3.2.1:	Keterangan: Description:	Status:
Direksi bertanggung jawab untuk memastikan Dewan Komisaris mendapatkan akses informasi yang akurat, relevan, dan tepat waktu. Dewan Komisaris sendiri memastikan bahwa ia memperoleh informasi yang memadai. Direksi menyediakan informasi kepada Dewan Komisaris secara teratur, tanpa penundaan, dan secara komprehensif tentang semua masalah yang relevan dengan korporasi. Dewan Komisaris sewaktu-waktu dapat meminta Direksi untuk memberikan informasi tambahan.	Untuk memastikan fungsi pengawasan Dewan Komisaris dapat berjalan secara efektif, maka Direksi memastikan Dewan Komisaris mendapatkan akses informasi secara akurat, relevan, dan tepat waktu. Anggaran Dasar dan kebijakan internal Bank memastikan ketersediaan informasi bagi Dewan Komisaris termasuk kewenangan Dewan Komisaris untuk sewaktu-waktu meminta Direksi untuk memberikan informasi tambahan.	Terpenuhi
The Board of Directors is responsible for ensuring that the Board of Commissioners has access to accurate, relevant, and timely information. The Board of Commissioners itself ensures that it obtains adequate information. The Board of Directors provides information to the Board of Commissioners regularly, without delay, and comprehensively on all matters relevant to the corporation. The Board of Commissioners may at any time request additional information to the Board of Directors.	To ensure that the Board of Commissioners' supervisory function can run effectively, the Board of Directors ensures that the Board of Commissioners has access to information that is accurate, relevant, and timely. The Bank's Articles of Association and internal policies ensure the availability of information for the Board of Commissioners, including the authority of the Board of Commissioners to at any time request the Board of Directors to provide additional information.	Complied

Rekomendasi 3.3: Tanggung Jawab Direksi dan Dewan Komisaris Atas Dampak Struktur.
Recommendation 3.3: Responsibilities of the Board of Directors and Board of Commissioners on Impacts of the Structure.

Rekomendasi 3.3.1: Recommendation 3.3.1:	Keterangan: Description:	Status:
Dampak struktur kepemilikan terhadap korporasi. Direksi dan Dewan Komisaris mempertimbangkan tanggung jawabnya dalam konteks struktur kepemilikan saham dan hubungan antar-Pemegang Saham korporasi yang mungkin berdampak terhadap pengelolaan dan operasi korporasi.	Dewan Komisaris dan Direksi Bank melaksanakan tugas dan tanggung jawab secara objektif dan independen.	Terpenuhi
The impact of ownership structure on the corporation. The Board of Directors and Board of Commissioners consider their responsibilities in the context of shareholding structure and relationships between corporate Shareholders, which may have an impact on corporate management and operations.	The Bank's Board of Commissioners and Board of Directors perform their duties and responsibilities objectively and independently.	Complied

Prinsip 4: Perilaku Etis dan Bertanggung Jawab
Principle 4: Ethical and Responsible Conduct

Rekomendasi 4.1: Pedoman Etika dan Perilaku.
Recommendation 4.1: Code of Conduct.

Rekomendasi 4.1.1: Recommendation 4.1.1:	Keterangan: Description:	Status:
Pernyataan ini dituangkan dalam Pedoman Perilaku dan Etika Usaha yang harus secara jelas mengungkapkan harapan korporasi bahwa setiap anggota Direksi dan Dewan Komisaris serta karyawan akan: 1. Bertindak untuk kepentingan terbaik korporasi; 2. Bertindak dengan jujur dan dengan integritas berstandar tinggi; 3. Bersikap independen dan bertindak berdasarkan informasi yang lengkap, dengan iktikad baik, dengan uji tuntas dan kehati-hatian; 4. Mematuhi peraturan perundang-undangan yang berlaku bagi korporasi dan operasinya; 5. Menghindari tindakan yang melanggar peraturan perundang-undangan atau tindakan yang tidak etis berdasarkan pedoman etika korporasi; 6. Tidak terlibat atau berpartisipasi dalam kegiatan apa pun yang akan menimbulkan benturan kepentingan dengan kepentingan terbaik korporasi atau yang akan berdampak negatif terhadap reputasi korporasi; 7. Tidak mengambil manfaat atas properti atau informasi yang dimiliki korporasi, kepemilikan aset lainnya atau pelanggannya untuk kepentingan pribadi atau yang menyebabkan kerugian bagi korporasi dan pelanggannya; 8. Tidak memanfaatkan jabatannya atau peluang yang dihasilkan oleh jabatannya untuk kepentingan pribadi; 9. Menghindari perbuatan meminta atau menerima dari pihak ketiga pembayaran, gratifikasi atau keuntungan lain untuk dirinya sendiri atau untuk orang lain yang menimbulkan benturan kepentingan/memberikan keuntungan kepada pihak ketiga secara melanggar peraturan perundang-undangan; 10. Menghormati perbedaan pendapat dan hak-hak setiap anggota Direksi, Dewan Komisaris, dan karyawan; dan 11. Memastikan pengungkapan yang lengkap, adil, akurat, tepat waktu, dan dapat dipahami dalam laporan dan dokumen yang disampaikan korporasi kepada regulator dan dalam komunikasi publik lainnya.	Bank memiliki Pedoman Kode Etik yang tertuang dalam Surat Keputusan Direksi No. 024/SK-DIR/02/23 tanggal 24 Februari 2023 tentang Pedoman Kode Etik Perilaku Karyawan, dan kebijakan pencegahan *anti-fraud* yang tertuang dalam Surat Keputusan Direksi No. 007/SK-DIR/10/24 tanggal 16 Oktober 2024 tentang Kebijakan Penerapan Strategi *Anti-Fraud*, yang wajib ditaati oleh seluruh insan Bank. Informasi lebih lengkap disampaikan dalam Laporan Tahunan ini.	Terpenuhi

This statement is set out in the Code of Conduct and Business Ethics, which must clearly state the corporate expectation that each member of the Board of Directors and Board of Commissioners and employees will: 1. Act in the best interests of the corporation; 2. Act honestly and with a high standard of integrity; 3. Be independent and act based on complete information, in good faith, with due diligence and prudence; 4. Comply with laws and regulations that apply to the corporation and its operations; 5. Avoid actions that violate laws and regulations or unethical actions based on corporate ethics guidelines; 6. Not be involved or participate in any activity that will create a conflict of interest with the corporation's best interests or have a negative impact on the corporation's reputation; 7. Not take advantage of property or information owned by the corporation, ownership of other assets or its customers, for personal gain or which causes harm to the corporation and its customers; 8. Not take advantage of the position or opportunities generated by the position for personal gain; 9. Avoid the act of requesting or receiving from third parties payments, gratuities, or other benefits for oneself or for other people that will lead to conflicts of interest/provide benefits to third parties by violating the laws and regulations; 10. Respect differences of opinion and the rights of each member of the Board of Directors, Board of Commissioners, and employees; and 11. Ensure complete, fair, accurate, timely, and understandable disclosure in reports and documents submitted by the corporation to regulators and in other public communications.	The Bank has the Code of Conduct as stated in the Board of Directors' Decision Letter No. 024/SK-DIR/02/23 dated 24 February 2023 on Employee's Code of Conduct, and anti-fraud prevention policy as stated in the Board of Directors' Decision Letter No. 007/SK-DIR/10/24 dated 16 October 2024 on Anti-Fraud Strategy Implementation Policy, which must be complied by all Bank personnel. More detailed information is presented in this Annual Report.	Complied
Rekomendasi 4.1.2: **Recommendation 4.1.2:**	**Keterangan:** **Description:**	**Status:**
Direksi menetapkan kebijakan dan praktik anti-pencucian uang dan pendanaan terorisme, anti-suap, anti-korupsi, anti-kecurangan (*anti-fraud*), keterlibatan dalam politik dengan mengacu pada standar nasional atau internasional mengenai anti-pencucian uang, anti-suap, anti-korupsi, anti-kecurangan, atau standar terkait lainnya.	Bank memiliki Pedoman Kode Etik yang tertuang dalam Surat Keputusan Direksi No. 024/SK-DIR/02/23 tanggal 24 Februari 2023 tentang Pedoman Kode Etik Perilaku Karyawan, dan kebijakan pencegahan *anti-fraud* yang tertuang dalam Surat Keputusan Direksi No. 007/SK-DIR/10/24 tanggal 16 Oktober 2024 tentang Kebijakan Penerapan Strategi *Anti-Fraud*, yang wajib ditaati oleh seluruh insan Bank. Informasi lebih lengkap disampaikan dalam Laporan Tahunan ini.	Terpenuhi
The Board of Directors establishes policies and practices for anti-money laundering and terrorist financing, anti-bribery, anti-corruption, anti-fraud, political involvement with reference to the national or international standards regarding anti-money laundering, anti-bribery, anti-corruption, anti-fraud, or other related standards.	The Bank has the Code of Conduct as stated in the Board of Directors' Decision Letter No. 024/SK-DIR/02/23 dated 24 February 2023 on Employee's Code of Conduct, and anti-fraud prevention policy as stated in the Board of Directors' Decision Letter No. 007/SK-DIR/10/24 dated 16 October 2024 on Anti-Fraud Strategy Implementation Policy, which must be complied by all Bank personnel. More detailed information is presented in this Annual Report.	Complied
Rekomendasi 4.2: Nilai–Nilai dan Budaya Organisasi. **Recommendation 4.2: Corporate Values and Culture.**		
Rekomendasi 4.2.1: **Recommendation 4.2.1:**	**Keterangan:** **Description:**	**Status:**
Korporasi mengartikulasikan, menumbuhkan, dan mengungkapkan budaya serta nilai-nilai korporasi.	Bank menetapkan dan memberlakukan SQEW sebagai nilai utama yang harus diimplementasikan oleh segenap insan Bank dalam menjalankan/melaksanakan tugas sehari-hari. Proses internalisasi SQEW dilakukan melalui berbagai aktivitas dan metode yang senantiasa dievaluasi agar implementasi dari nilai tersebut dapat berjalan dengan optimal.	Terpenuhi
The corporation articulates, fosters, and discloses corporate culture and values.	The Bank determines and enforces SQEW as the main value that must be implemented by all Bank personnel in carrying out/implementing daily tasks. The SQEW internalization process is carried out through various activities and methods that are constantly evaluated for the implementation of these values to run optimally.	Complied

Rekomendasi 4.3: Penegakan dan Komunikasi Pedoman Etika, Nilai-Nilai, dan Budaya.
Recommendation 4.3: Enforcement and Communication of the Code of Conduct, Values, and Culture.

Rekomendasi 4.3.1: Recommendation 4.3.1:	Keterangan: Description:	Status:
Pedoman perilaku dan kode etik korporasi dikomunikasikan secara efektif kepada Direksi, Dewan Komisaris, serta seluruh karyawan, diintegrasikan ke dalam strategi dan operasi korporasi termasuk sistem manajemen risiko dan struktur remunerasi, serta ditegakkan.	Direksi secara konsisten melakukan internalisasi Kode Etik untuk membentuk sikap dan karakter setiap insan Bank. Internalisasi diintegrasikan ke dalam strategi dan operasi Bank, termasuk sistem manajemen risiko dan struktur remunerasi yang disusun.	Terpenuhi
The corporate code of conduct and code of ethics are communicated effectively to the Board of Directors, Board of Commissioners, and all employees, integrated into corporate strategy and operations, including risk management system and remuneration structure, and being enforced.	The Board of Directors consistently internalizes the Code of Conduct to shape the attitude and character of all Bank personnel. Internalization is integrated into the Bank's strategy and operations, including risk management system and remuneration structure that are prepared.	Complied

Prinsip 5: Manajemen Risiko, Pengendalian Internal, dan Kepatuhan
Principle 5: Risk Management, Internal Control, and Compliance

Rekomendasi 5.1: Pengendalian Internal dan Kepatuhan.
Recommendation 5.1: Internal Control and Compliance.

Rekomendasi 5.1.1: Recommendation 5.1.1:	Keterangan: Description:	Status:
Direksi melakukan kaji ulang secara berkala atas ketepatan desain dan efektivitas operasional sistem governansi, pengelolaan risiko, pengendalian internal, dan kepatuhan korporasi dan melaporkan pelaksanaan dan hasil kaji ulang kepada para Pemegang Saham melalui Laporan Tahunan Korporasi.	Direksi melakukan implementasi, kaji ulang, dan pemutakhiran tata kelola Bank, pengelolaan risiko, pengendalian internal, dan kepatuhan Bank, serta melaporkannya dalam Laporan Tahunan ini sebagai bentuk pelaporan kepada Pemegang Saham dan pemangku kepentingan, yang selanjutnya dilaporkan dalam RUPS.	Terpenuhi
The Board of Directors periodically reviews the accuracy of designs and operational effectiveness of the governance system, risk management, internal control, and corporate compliance and reports the implementation and review results to Shareholders through the Corporate Annual Report.	The Board of Directors implements, reviews, and updates the Bank's governance, risk management, internal control, and compliance, and reports them in this Annual Report as a form of reporting to Shareholders and stakeholders, which is then reported at the GMS.	Complied

Rekomendasi 5.2: Manajemen Risiko.
Recommendation 5.2: Risk Management.

Rekomendasi 5.2.1: Recommendation 5.2.1:	Keterangan: Description:	Status:
Strategi dan risiko merupakan satu kesatuan, diungkapkan secara transparan, masuk ke dalam pelaksanaan tugas dan tanggung jawab Direksi dan Dewan Komisaris, serta dalam diskusi di rapat Dewan Komisaris dan Direksi.	Dewan Komisaris dan Direksi senantiasa melakukan pengelolaan dan pemantauan risiko-risiko utama Bank dengan baik. Menyeimbangkan antara risiko, budaya kepatuhan, dan kecukupan modal juga menjadi kebijakan pilar strategis Bank. Dewan Komisaris dan Direksi dibantu oleh Komite Pemantau Risiko dan Komite Manajemen Risiko secara berkala memantau dan mengkaji efektivitas pengendalian dan pengelolaan risiko di setiap rapat dibantu juga oleh SKAI.	Terpenuhi
Strategy and risk is a unity, disclosed transparently, included in the implementation of duties and responsibilities of the Board of Directors and Board of Commissioners, as well as in discussions at meetings of the Board of Commissioners and Board of Directors.	The Board of Commissioners and Board of Directors always manage and monitor the Bank's main risks properly. Balancing risk, compliance culture, and capital adequacy is also the Bank's strategic pillar policy. The Board of Commissioners and Board of Directors are assisted by the Risk Monitoring Committee and Risk Management Committee, which regularly monitor and review the effectiveness of risk control and management at each meeting, and are also assisted by the SKAI.	Complied

Rekomendasi 5.2.2: Recommendation 5.2.2:	Keterangan: Description:	Status:
Komite Pemantau Manajemen Risiko membantu pelaksanaan tugas Dewan Komisaris dengan menciptakan mekanisme yang transparan, fokus, dan independen dalam pengawasan manajemen risiko korporasi.	Komite Pemantau Risiko sebagai salah satu Komite di bawah Dewan Komisaris telah membantu pelaksanaan tugas Dewan Komisaris dengan menciptakan mekanisme yang transparan, fokus, dan independen dalam pengawasan manajemen risiko Bank, dengan berpedoman pada Piagam Komite Pemantau Risiko.	Terpenuhi
The Risk Management Monitoring Committee assists the implementation of the Board of Commissioners' duties by creating a transparent, focused, and independent mechanism for overseeing corporate risk management.	The Risk Monitoring Committee as one of the Committees under the Board of Commissioners has assisted in the Board of Commissioners' duty implementation by creating a transparent, focused, and independent mechanism in supervising the Bank's risk management, guided by the Risk Monitoring Committee Charter.	Complied

Rekomendasi 5.3: Integrasi Governansi, Manajemen Risiko, dan Kepatuhan.
Recommendation 5.3: Integration of Governance, Risk Management, and Compliance.

Rekomendasi 5.3.1: Recommendation 5.3.1:	Keterangan: Description:	Status:
Direksi membangun sistem governansi, manajemen risiko, dan kepatuhan (GRC) yang terintegrasi, dengan menangani berbagai ketidakpastian secara terpadu dan dengan integritas yang tinggi, untuk meyakinkan bahwa korporasi dapat mencapai tujuannya.	Direksi membangun sistem tata kelola, manajemen risiko, dan kepatuhan (GRC) yang terintegrasi, dengan menangani berbagai ketidakpastian secara terpadu dan dengan integritas yang tinggi, untuk meyakinkan bahwa Bank dapat mencapai tujuan yang telah ditetapkan.	Terpenuhi
The Board of Directors establishes an integrated governance, risk management, and compliance (GRC) system, by handling various uncertainties in an integrated manner and with high integrity, to ensure that the corporation can achieve its objectives.	The Board of Directors has built an integrated governance, risk management, and compliance (GRC) system, by handling various uncertainties in an integrated manner and with high integrity, to ensure that the Bank can achieve its stated goals.	Complied
Rekomendasi 5.3.2: **Recommendation 5.3.2:**	**Keterangan:** **Description:**	**Status:**
Direksi memastikan bahwa bagian yang membawahi fungsi kepatuhan tidak merangkap melaksanakan fungsi yang berpotensi menimbulkan benturan kepentingan.	Direktur Kepatuhan dan Manajemen Risiko serta organ di bawahnya yang membawahi fungsi kepatuhan tidak merangkap melaksanakan fungsi yang berpotensi menimbulkan benturan kepentingan sebagaimana digambarkan dalam Struktur Organisasi Bank dalam Laporan Tahunan ini.	Terpenuhi
The Board of Directors ensures that the division in charge of the compliance function does not concurrently perform functions that have the potential to cause a conflict of interest.	The Director of Compliance and Risk Management and all its sub-organs who oversee the compliance function do not concurrently perform functions that have the potential to cause a conflict of interest as described in the Bank's Organizational Structure in this Annual Report.	Complied

Rekomendasi 5.4: Audit Internal.
Recommendation 5.4: Internal Audit.

Rekomendasi 5.4.1: Recommendation 5.4.1:	Keterangan: Description:	Status:
Dewan Komisaris melalui Komite Audit memantau dan memastikan bahwa fungsi audit internal membantu korporasi untuk mencapai tujuannya dengan membawa pendekatan yang objektif dan disiplin untuk mengevaluasi dan meningkatkan efektivitas manajemen risiko, pengendalian internal, dan governansi korporat.	Dewan Komisaris melalui Komite Audit telah melakukan pemantauan bahwa fungsi audit internal Bank telah dilaksanakan sesuai kebutuhan, dengan objektif dan tujuan yang strategis dan terukur.	Terpenuhi
The Board of Commissioners, through the Audit Committee, oversees and ensures that the internal audit function assists the corporation to achieve its objectives through an objective and disciplined approach to evaluate and improve the effectiveness of risk management, internal control, and corporate governance.	The Board of Commissioners, through the Audit Committee, has overseen that the Bank's internal audit function is implemented as necessary, with strategic and measurable objectives and goals.	Complied

Prinsip 6: Pengungkapan dan Transparansi
Principle 6: Disclosure and Transparency

Rekomendasi 6.1: Kebijakan Pengungkapan.
Recommendation 6.1: Disclosure Policy.

Rekomendasi 6.1.1: Recommendation 6.1.1:	Keterangan: Description:	Status:
Korporasi memiliki kebijakan dan prosedur pengungkapan dan transparansi yang memastikan pengungkapan informasi material dan menjaga informasi sensitif serta rahasia korporasi.	Anggaran Dasar Bank telah mengatur pengungkapan informasi material dan menjaga informasi sensitif serta rahasia, serta kewajiban pengungkapan/keterbukaan informasi berdasarkan peraturan berlaku.	Terpenuhi
The corporation has disclosure and transparency policies and procedures that ensure disclosure of material information and safeguard sensitive information as well as corporate secrets.	The Bank's Articles of Association have regulated the disclosure of material information and maintaining sensitive and confidential information, as well as the obligation to disclose/open information based on applicable regulations.	Complied
Rekomendasi 6.1.2: **Recommendation 6.1.2:**	**Keterangan:** **Description:**	**Status:**
Hak Pemegang Saham untuk memperoleh secara teratur dan tepat waktu informasi material yang relevan tentang korporasi harus dipenuhi.	Bank memastikan bahwa seluruh Pemegang Saham memiliki hak yang setara dalam menerima informasi material yang akurat, tepat waktu, dan berkala. Penyampaian informasi ini dilakukan sesuai dengan peraturan yang berlaku, sehingga transparansi dan keadilan dalam pengelolaan Bank dapat terjaga dengan baik.	Terpenuhi
Shareholders' rights to obtain regularly and timely relevant material information regarding the corporation must be fulfilled.	The Bank ensures that all Shareholders have equal rights to receive accurate, timely, and periodic material information. This information is delivered in accordance with applicable regulations, so that transparency and fairness in the Bank management can be maintained properly.	Complied

Rekomendasi 6.2: Laporan Keuangan dan Keberlanjutan.
Recommendation 6.2: Financial Statements and Sustainability Report.

Rekomendasi 6.2.1: **Recommendation 6.2.1:**	**Keterangan:** **Description:**	**Status:**
Korporasi mengungkapkan sistem dan prosedur untuk memastikan bahwa Laporan Keuangan Interim yang tidak diaudit atau dikaji ulang oleh auditor eksternal secara material adalah akurat, lengkap, dan memberikan investor informasi yang tepat untuk membuat keputusan investasi yang tepat.	Bank memiliki kebijakan internal, antara lain melalui fungsi Komite Audit, untuk melakukan penelaahan atas informasi keuangan yang akan dikeluarkan Bank kepada publik dan/atau pihak otoritas, antara lain Laporan Keuangan, proyeksi, dan laporan lainnya terkait dengan informasi keuangan.	Terpenuhi
The Corporation discloses systems and procedures to ensure that Interim Financial Statements that are not materially audited or reviewed by external auditors are accurate, complete, and provide investors with the appropriate information to make the right investment decisions.	The Bank has an internal policy, including through the Audit Committee function, to review financial information to be issued by the Bank to the public and/or authorities, including Financial Statements, projections, and other reports related to financial information.	Complied
Rekomendasi 6.2.2: **Recommendation 6.2.2:**	**Keterangan:** **Description:**	**Status:**
Komite Audit memastikan kualitas audit Laporan Keuangan yang dilaksanakan oleh auditor eksternal. Kegiatan ini termasuk merekomendasikan penunjukan, penunjukan kembali, dan jika perlu, pemberhentian, serta remunerasi auditor eksternal.	Tugas dan tanggung jawab Komite Audit antara lain melakukan evaluasi terhadap pelaksanaan pemberian jasa audit atas informasi keuangan historis tahunan oleh akuntan publik dan/atau kantor akuntan publik.	Terpenuhi
The Audit Committee ensures the quality of audit on Financial Statements conducted by the external auditors. This activity includes recommending the appointment, reappointment, and, if necessary, dismissal, and remuneration of the external auditors.	Duties and responsibilities of the Audit Committee include evaluating the implementation of the provision of audit services for annual historical financial information by public accountant and/or public accounting firm.	Complied
Rekomendasi 6.2.3: **Recommendation 6.2.3:**	**Keterangan:** **Description:**	**Status:**
Laporan Keberlanjutan harus disiapkan dan diungkapkan dengan akurat dan disusun sesuai kerangka pelaporan keberlanjutan nasional atau internasional.	Laporan Keberlanjutan Bank disusun sesuai kerangka pelaporan keberlanjutan dari Peraturan Otoritas Jasa Keuangan. Meski demikian, pelaporan keberlanjutan Bank telah memuat beberapa kriteria GRI meskipun belum sepenuhnya.	Penjelasan
The Sustainability Report shall be accurately prepared and disclosed and compiled in accordance with national or international sustainability reporting frameworks.	The Sustainability Report of the Bank is prepared in accordance with the sustainability reporting framework of the Financial Services Authority Regulations. Nevertheless, the Bank's sustainability reporting consists of several GRI criteria, although not fully covered.	Explanation
Rekomendasi 6.2.4: **Recommendation 6.2.4:**	**Keterangan:** **Description:**	**Status:**
Korporasi menerbitkan Laporan Tahunan secara terintegrasi yang menempatkan kinerja historis ke dalam konteks dan menggambarkan risiko, peluang, dan prospek korporasi di masa depan, sehingga membantu Pemegang Saham dan pemangku kepentingan memahami tujuan strategis korporasi dan kemajuannya dalam menciptakan nilai yang berkelanjutan.	Laporan Tahunan Bank secara terintegrasi mengungkapkan kinerja historis ke dalam konteks dan menggambarkan risiko, peluang, dan prospek Bank di masa depan, sehingga diharapkan dapat membantu Pemegang Saham dan pemangku kepentingan memahami tujuan strategis Bank dan kemajuannya dalam menciptakan nilai yang berkelanjutan.	Terpenuhi
The corporation issues an integrated Annual Report that puts historical performance into context and describes the corporation's risks, opportunities, and future prospects, thereby helping Shareholders and stakeholders understand the corporation's strategic objectives and its progress in creating sustainable value.	The Bank's Annual Report in an integrated manner discloses historical performance in context and describes the Bank's risks, opportunities, and prospects in the future, and therefore, it is expected to help Shareholders and stakeholders understand the Bank's strategic objectives and its progress in creating sustainable value.	Complied

Rekomendasi 6.3: Diseminasi Informasi.
Recommendation 6.3: Dissemination of Information.

Rekomendasi 6.3.1: **Recommendation 6.3.1:**	**Keterangan:** **Description:**	**Status:**
Saluran penyebaran informasi harus menyediakan akses yang setara, tepat waktu, dan relatif murah untuk informasi yang relevan bagi pengguna.	Untuk memastikan informasi tersedia kepada Pemegang Saham dan pemangku kepentingan secara setara, tepat waktu, relatif murah, dan relevan, maka Bank menyediakan berbagai akses informasi, yakni media sosial, situs web, *e-mail blast* dan paparan publik bagi nasabah dan publik, siaran pers, serta kanal komunikasi khusus internal untuk karyawan Bank.	Terpenuhi
Channels for disseminating Information should provide users with equal, timely, and relatively inexpensive access to relevant information.	To ensure that information is available to Shareholders and stakeholders equally, timely, relatively cheaply, and relevantly, the Bank provides various information accesses, namely social media, websites, e-mail blasts, and public exposures for customers and the public, press releases, and special internal communication channels for the Bank's employees.	Complied

Rekomendasi 6.3.2: Recommendation 6.3.2:	Keterangan: Description:	Status:
Korporasi memastikan bahwa pernyataan tahunan terhadap penerapan Pedoman Umum Governansi Korporat Indonesia, termasuk penjelasan atas penerapan atas masing-masing Rekomendasi dan Panduan tersedia di situs web selama jangka waktu minimal 5 (lima) tahun. The corporation ensures that an annual statement regarding the implementation of General Guidelines for Indonesian Corporate Governance, including an explanation of the implementation of each Recommendation and Guideline is available on the website for a minimum period of 5 (five) years.	Saat ini, pernyataan terhadap penerapan PUGKI belum tersedia di situs web Bank. Namun demikian, Laporan Tahunan Bank telah memuat pernyataan tahunan terhadap penerapan PUGKI. Currently, a statement on the implementation of PUGKI is not available on the Bank's website. However, the Bank's Annual Report has included an annual statement on the implementation of PUGKI.	Penjelasan Explanation

Rekomendasi 6.3.3: Recommendation 6.3.3:	Keterangan: Description:	Status:
Untuk korporasi yang terdaftar di pasar modal di yurisdiksi selain yurisdiksi asal, peraturan perundang-undangan atas governansi korporat yang berlaku harus di diungkapkan dengan jelas. Dalam hal *cross listing*, kriteria dan prosedur *cross listing*, kriteria dan prosedur untuk mengakui persyaratan *listing* untuk *listing* utama harus transparan dan didokumentasikan. For corporations listed on the capital market in jurisdictions other than the jurisdiction of origin, applicable laws and regulations on corporate governance must be clearly disclosed. In the case of cross listing, the criteria and procedures for cross listing, criteria and procedures for recognizing the listing requirements for the primary listing must be transparent and documented.	Bank merupakan entitas usaha yang didirikan di Indonesia dan tunduk terhadap peraturan yang berlaku di Indonesia. The Bank is a business entity incorporated in Indonesia and is subject to the applicable regulations in Indonesia.	Terpenuhi Complied

Prinsip 7: Perlindungan Terhadap Hak-Hak Pemegang Saham
Principle 7: Protection of Shareholders Rights

Rekomendasi 7.1: Hak Pemegang Saham.
Recommendation 7.1: Shareholders Rights.

Rekomendasi 7.1.1: Recommendation 7.1.1:	Keterangan: Description:	Status:
Korporasi memiliki suatu kebijakan komunikasi yang memfasilitasi dan mendorong partisipasi Pemegang Saham atau investor. The corporation has a communication policy that facilitates and encourages shareholder or investor participation.	Anggaran Dasar Bank telah mengatur kebijakan komunikasi dengan Pemegang Saham dan investor. The Bank's Articles of Association have stipulated policy on communication with Shareholders and investors.	Terpenuhi Complied

Rekomendasi 7.1.2: Recommendation 7.1.2:	Keterangan: Description:	Status:
Korporasi yang merupakan Entitas Induk memastikan bahwa kebijakan governansi korporatnya berlaku bagi Entitas Anak dan Entitas Sepengendali yang di dalamnya investasi korporasi adalah signifikan. Corporations that are Parent Entities ensure that their corporate governance policies apply to Subsidiaries and Entities under Common Control in which their investment is significant.	Bank memiliki kebijakan komunikasi dengan Pemegang Saham dan investor yang diatur dalam Anggaran Dasar Bank. Saat ini, Bank tidak memiliki Entitas Anak dan Entitas Sepengendali. The Bank has a communication policy with Shareholders and investors as stipulated in the Bank's Articles of Association. Currently, the Bank does not have any Subsidiaries and entities under common control.	Penjelasan Explanation

Rekomendasi 7.1.3: Recommendation 7.1.3:	Keterangan: Description:	Status:
Korporasi memiliki aturan dan prosedur yang mengatur akuisisi, pengambilalihan, dan transaksi luar biasa, seperti merger dan penjualan aset korporasi yang substansial untuk memastikan transaksi terjadi secara transparan dan dalam kondisi yang wajar dan melindungi hak-hak semua Pemegang Saham sesuai dengan kelasnya. Corporations have rules and procedures that govern acquisitions, takeovers, and extraordinary transactions, such as mergers and sales of substantial corporate assets to ensure that the transactions occur in a transparent manner and under reasonable conditions as well as protecting the rights of all Shareholders according to class.	Anggaran Dasar Bank telah mengatur prosedur yang mengatur akuisisi, pengambilalihan, dan transaksi luar biasa. Selain itu, hak, wewenang, dan tanggung jawab Pemegang Saham juga diatur secara rinci dalam Anggaran Dasar yang dapat diakses juga di situs web Bank (www.victoriabank.co.id). The Bank's Articles of Association has set out procedures that govern acquisitions, takeovers, and extraordinary transactions. In addition, the rights, authorities, and responsibilities of Shareholders are also stipulated in detail in the Articles of Association, accessible on the Bank's website (www.victoriabank.co.id).	Terpenuhi Complied

Rekomendasi 7.2: Perlakuan Adil Terhadap Pemegang Saham.
Recommendation 7.2: Fair Treatment to Shareholders.

Rekomendasi 7.2.1: **Recommendation 7.2.1:**	**Keterangan:** **Description:**	**Status:**
Korporasi memiliki aturan dan prosedur yang memastikan: 1. Semua Pemegang Saham dari seri yang sama dalam 1 (satu) kelas saham harus diperlakukan setara; dan 2. Pengungkapan aturan dan prosedur tersebut serta pengungkapan struktur modal dan pengaturan yang memungkinkan Pemegang Saham tertentu memeroleh pengaruh atau kendali yang tidak proporsional dengan kepemilikan sahamnya.	Seluruh Pemegang Saham Bank baik minoritas maupun mayoritas, baik domestik dan non-domestik, diperlakukan secara setara. Informasi yang relevan bagi Pemegang Saham dipublikasikan kepada masyarakat melalui media yang mudah diakses Pemegang Saham (situs web Bank, Bursa Efek Indonesia, dan KSEI) dalam bahasa Indonesia dan bahasa Inggris.	Terpenuhi
Corporations have rules and procedures ensuring that: 1. All Shareholders of the same series in 1 (one) class of shares shall be treated equally; and 2. There shall be disclosure of such rules and procedures, as well as disclosure of capital structure and arrangements that allow certain Shareholders to gain influence or control that is disproportionate to their share ownership.	All Shareholders of the Bank, both minority and majority, either domestic or non-domestic, are treated equally. Information relevant to Shareholders is published to the public through media that is easily accessible to Shareholders (the website of the Bank, Indonesia Stock Exchange, and KSEI) in Indonesian and English.	Complied
Rekomendasi 7.2.2: **Recommendation 7.2.2:**	**Keterangan:** **Description:**	**Status:**
Korporasi memiliki aturan dan prosedur yang memastikan transaksi pihak berelasi disetujui dan dilaksanakan sedemikian rupa yang dapat meyakinkan bahwa benturan kepentingan telah dikelola dengan tepat, dan melindungi kepentingan korporasi dan Pemegang Saham.	Bank senantiasa memastikan bahwa setiap transaksi dengan pihak berelasi dilakukan tanpa benturan kepentingan, serta kepentingan Bank dan para Pemegang Saham tetap terlindungi. Melalui pengawasan yang ketat, Bank menjaga integritas dan transparansi dalam semua transaksi untuk meminimalkan risiko serta memastikan kepatuhan terhadap peraturan yang berlaku.	Terpenuhi
The corporation has rules and procedures that ensure related party transactions are approved and implemented in such a way as to ensure that conflicts of interest are properly managed, and protect the interests of the corporation and Shareholders.	The Bank always ensures that every transaction with related parties is carried out with no conflict of interest, and the interests of the Bank and its Shareholders remain protected. Through strict supervision, the Bank maintains integrity and transparency in all transactions to minimize risk and ensure its compliance with applicable regulations.	Complied
Rekomendasi 7.2.3: **Recommendation 7.2.3:**	**Keterangan:** **Description:**	**Status:**
Korporasi memiliki dan mengungkapkan kebijakan untuk mencegah terjadinya *insider trading*. Korporasi memiliki aturan yang jelas mengenai perdagangan apa pun dalam saham korporasi yang dilakukan oleh Direktur, Komisaris dan orang dalam untuk memastikan bahwa siapa pun tidak boleh mendapatkan keuntungan secara langsung atau tidak langsung dari informasi yang tidak/belum tersedia di pasar.	Kode Etik Bank telah memuat mekanisme pencegahan *insider trading*.	Terpenuhi
The corporation has and discloses policies to prevent insider trading. The corporation has clear rules regarding any trading in corporate shares conducted by Directors, Commissioners, and insiders to ensure that no one may benefit directly or indirectly from information that is not/not yet available in the market.	The Bank's Code of Conduct sets out the mechanism for preventing insider trading.	Complied

Rekomendasi 7.3: Rapat Umum Pemegang Saham.
Recommendation 7.3: General Meeting of Shareholders.

Rekomendasi 7.3.1: **Recommendation 7.3.1:**	**Keterangan:** **Description:**	**Status:**
Korporasi melakukan panggilan RUPS dengan agenda dan materi RUPS selengkap dan sedini mungkin (paling lambat 28 hari sebelum RUPS) untuk memberikan waktu dan materi yang cukup bagi Pemegang Saham untuk mempelajari dengan baik agenda rapat. Undangan rapat dan seluruh informasi RUPS diungkapkan melalui sarana elektronik seperti melalui situs web korporasi.	Bank melakukan panggilan RUPS sedini mungkin dengan memperhatikan peraturan perundang-undangan, serta memberikan ruang dan tanggapan kepada Pemegang Saham yang memerlukan tambahan informasi perihal penyelenggaraan dan mata acara RUPS. Undangan RUPS diungkapkan melalui sarana elektronik yaitu situs web Bank, Bursa Efek Indonesia, dan KSEI.	Terpenuhi
The corporation makes a notice for GMS with the agenda and materials for GMS as completely and as early as possible (no later than 28 days prior to the GMS) to provide sufficient time and materials for Shareholders to properly study the meeting agenda. Meeting invitations and all GMS information are disclosed through electronic means, such as through the corporate website.	The Bank makes a notice for GMS as early as possible by considering laws and regulations, and provides space and responses to Shareholders who require additional information regarding GMS implementation and agenda items. The invitation for GMS is disclosed through electronic means, namely the Bank's website, Indonesia Stock Exchange, and KSEI.	Complied

Rekomendasi 7.3.2: Recommendation 7.3.2:	Keterangan: Description:	Status:
Korporasi memiliki dan mengungkapkan aturan dan prosedur yang memfasilitasi Pemegang Saham dalam berpartisipasi dan memberikan suara secara efektif di RUPS. The Corporation has and discloses rules and procedures that facilitate Shareholders to participate and vote effectively at the GMS.	Dalam setiap RUPS, Bank memublikasikan tata tertib rapat yang mengakomodir informasi terkait fasilitas bagi Pemegang Saham untuk berpartisipasi dan memberikan suara secara efektif dalam RUPS. In each GMS, the Bank publishes the meeting rules that accommodate information related to facilities for Shareholders to participate and vote effectively in the GMS.	Terpenuhi Complied
Rekomendasi 7.3.3: **Recommendation 7.3.3:**	**Keterangan:** **Description:**	**Status:**
Pemegang Saham berpartisipasi efektif dalam menetapkan penunjukan anggota Direksi dan Dewan Komisaris. Shareholders participate effectively to determine the appointment of members of the Board of Directors and Board of Commissioners.	Dalam RUPS dengan agenda perubahan susunan pengurus Bank, Pemegang Saham diberikan kesempatan untuk mengajukan pertanyaan dan/atau tanggapan, serta menyampaikan suaranya. In GMS with agenda of changing the composition of the Bank's management, Shareholders are given the opportunity to ask questions and/or provide responses, and to express their opinions.	Terpenuhi Complied
Rekomendasi 7.3.4: **Recommendation 7.3.4:**	**Keterangan:** **Description:**	**Status:**
Korporasi memastikan transparansi dan akuntabilitas auditor eksternal di RUPS. The corporation ensures transparency and accountability of the external auditor at the GMS.	Dalam RUPS dengan agenda penetapan kantor akuntan publik dan/atau akuntan publik, Bank memberikan penjelasan mengenai kantor akuntan publik dan/atau akuntan publik yang diusulkan dalam RUPS. In the GMS with agenda of determining public accounting firm and/or public accountant, the Bank provides an explanation regarding public accounting firm and/or public accountant proposed at the GMS.	Terpenuhi Complied
Rekomendasi 7.3.5: **Recommendation 7.3.5:**	**Keterangan:** **Description:**	**Status:**
Penyampaian hasil pemungutan suara dan ringkasan risalah RUPS secara lengkap diumumkan ke publik pada hari kerja berikutnya. Submission of voting results and a complete summary of the GMS minutes are announced to the public on the following working day.	Penyampaian hasil pemungutan suara dan ringkasan risalah RUPS kepada publik dilakukan di hari yang sama setelah selesainya RUPS melalui situs web Bank. Submission of voting results and summary of GMS minutes to public are announced on the same day after the completion of GMS through the Bank's website.	Terpenuhi Complied

Prinsip 8: Penghargaan Terhadap Pemangku Kepentingan
Principle 8: Award for Stakeholders

Rekomendasi 8.1: Keterlibatan Pemangku Kepentingan Kunci (*Stakeholder Engagement*).
Recommendation 8.1: Key Stakeholder Engagement.

Rekomendasi 8.1.1: Recommendation 8.1.1:	Keterangan: Description:	Status:
Korporasi melalui Sekretaris Korporasi melaksanakan komunikasi yang reguler, transparan, dan efektif dengan pemangku kepentingan kunci serta melibatkan mereka untuk memahami harapan dan keluhan mereka serta dampak korporasi terhadap mereka. The corporation, through the Corporate Secretary, carries out regular, transparent, and effective communication with key stakeholders and engages them to understand their expectations, grievances, and the impact of the corporation on them.	Bank telah mengungkapkan proses identifikasi dan pemilihan pemangku kepentingan kunci yang dilibatkan, yang dijelaskan secara rinci dalam Laporan Tahunan. Selain itu, Bank juga menyediakan mekanisme WBS yang berfungsi sebagai saluran aman dan independen bagi pemangku kepentingan untuk menyampaikan saran, masukan, serta keluhan atau pengaduan. Melalui langkah ini, Bank memastikan transparansi dan keterlibatan aktif dalam menangani isu-isu penting yang relevan bagi keberlanjutan dan integritas operasional. The Bank has disclosed the process of identifying and selecting key stakeholders involved, which is explained in detail in the Annual Report. In addition, the Bank also provides WBS mechanism that functions as a safe and independent channel for stakeholders to submit suggestions, input, and complaints or grievances. Through this step, the Bank ensures transparency and active involvement in addressing important issues relevant to sustainability and operational integrity.	Terpenuhi Complied

Rekomendasi 8.2: Integrasi Keberlanjutan dalam Model Bisnis.
Recommendation 8.2: Integration of Sustainability in Business Models.

Rekomendasi 8.2.1: Recommendation 8.2.1:	Keterangan: Description:	Status:
Dewan Komisaris bersama-sama dengan Direksi bertanggung jawab, akuntabel, dan transparan atas governansi keberlanjutan, termasuk menetapkan strategi, prioritas, dan target keberlanjutan korporasi. Direksi dan Dewan Komisaris memasukkan pertimbangan keberlanjutan ketika menjalankan perannya, termasuk antara lain dalam pengembangan dan implementasi strategi korporasi, rencana bisnis, rencana aksi utama dan manajemen risiko.	Direksi memastikan bahwa strategi, prioritas, dan target keberlanjutan korporasi dikomunikasikan dengan jelas kepada para pemangku kepentingan. Pencapaian dan kinerja terhadap target-target ini disampaikan secara transparan melalui Laporan Tahunan, memberikan gambaran menyeluruh tentang komitmen Bank dalam mendukung keberlanjutan. Melalui komunikasi yang terbuka ini, pemangku kepentingan dapat memahami langkah-langkah yang diambil Bank untuk mencapai tujuan keberlanjutan.	Terpenuhi
The Board of Commissioners and the Board of Directors are responsible, accountable, and transparent for sustainability governance, including in establishing corporate sustainability strategies, priorities, and targets. The Board of Directors and Board of Board of Commissioners incorporate sustainability considerations when performing their roles, including by developing and implementing corporate strategies, business plans, main action plans, and risk management.	The Board of Directors ensures that the corporate sustainability strategy, priorities, and targets are clearly communicated to stakeholders. Achievements and performance on these targets are presented transparently through the Annual Report, providing a comprehensive overview of the Bank's commitment to supporting sustainability. Through this open communication, stakeholders can understand the steps taken by the Bank to achieve sustainability goals.	Complied

Rekomendasi 8.3: Perlindungan Terhadap Pemangku Kepentingan.
Recommendation 8.3: Protection for Stakeholders.

Rekomendasi 8.3.1: Recommendation 8.3.1:	Keterangan: Description:	Status:
Direksi memastikan dan mengungkapkan bahwa operasi korporasi mencerminkan penerapan standar etika, tanggung jawab sosial dan lingkungan yang tinggi di seluruh korporasi dan memastikan bahwa kebijakan dan prosedur yang tepat diterapkan untuk menghormati serta mematuhi hak-hak pemangku kepentingan.	Bank memiliki berbagai kebijakan sebagai pedoman dalam menjalankan operasi bisnis yang sesuai etika, tanggung jawab sosial dan lingkungan, serta menghormati dan mematuhi hak-hak pemangku kepentingan. Hal ini disampaikan secara lengkap pada Laporan Tahunan Bank.	Terpenuhi
The Board of Directors ensures and discloses that corporate operations reflect the application of high standards of ethics, social and environmental responsibility throughout the corporation and ensures that appropriate policies and procedures are in place to respect and comply with stakeholder rights.	The Bank has various policies as guidelines in carrying out business operations that are ethical, socially, and environmentally responsible, and respecting and complying with the stakeholders rights. This is presented completely in the Bank's Annual Report.	Complied
Rekomendasi 8.3.2: **Recommendation 8.3.2:**	**Keterangan:** **Description:**	**Status:**
Direksi mendorong karyawan bekerja untuk kepentingan jangka panjang korporasi dan mengedepankan keberlanjutan.	Bank memiliki standar operasional prosedur kebijakan pemberian insentif jangka panjang kepada karyawan yang mendorong penciptaan nilai yang berkelanjutan sebagaimana diatur dalam Keputusan Direksi No. 005/SK-DIR/01/24 tanggal 8 Januari 2024 tentang Standar Operasional Prosedur *Human Capital Management*.	Terpenuhi
The Board of Directors encourages employees to work for the long-term interests of the corporation and prioritizes sustainability.	The Bank has standard operating procedures for the policy on providing long-term incentives to employees that encourage sustainable value creation as stipulated in the Board of Directors' Decision No. 005/SK-DIR/01/24 dated 8 January 2024 on Standard Operating Procedures for Human Capital Management.	Complied

Rencana Strategis Bank
Bank's Strategic Plans

Dewan Komisaris dan Direksi senantiasa aktif membangun komunikasi dalam menyelaraskan pandangan atas rencana strategis Bank. Rencana strategis Bank Victoria dituangkan dalam RBB yang disusun dengan mengacu pada Peraturan Otoritas Jasa Keuangan No. 5/POJK.03/2016, serta mempertimbangkan faktor eksternal dan internal, prinsip kehati-hatian, manajemen risiko, dan asas perbankan yang sehat. Untuk RBB 2025-2027, Bank mengangkat tema "*Sustainable Growth Through Digitalization and Strong Governance*" dengan uraian sebagai berikut:

The Board of Commissioners and the Board of Directors are always active in building communication in aligning views on the Bank's strategic plans. Bank Victoria's strategic plan is stated in RBB, prepared with reference to the Financial Services Authority Regulation No. 5/POJK.03/2016, and by considering external and internal factors, prudential principles, risk management, and sound banking principles. For the 2025-2027 RBB, the Bank has adopted the theme "Sustainable Growth Through Digitalization and Strong Governance" with the following description:

Rencana Jangka Panjang

Untuk jangka waktu 5 (lima) tahun ke depan, Bank telah merumuskan strategi usaha yang berfokus pada pertumbuhan berkelanjutan dan peningkatan daya saing. Strategi tersebut diuraikan sebagai berikut:

1. Menjaga dan memperkuat penerapan prinsip-prinsip GCG secara konsisten, selaras dengan prinsip manajemen risiko dan kepatuhan terhadap regulasi (*compliance*);
2. Memastikan tingkat permodalan tetap kuat dan memadai sebagai landasan pengembangan serta pertumbuhan skala bisnis Bank yang *prudent* dan berkelanjutan;
3. Mengoptimalkan efisiensi dan produktivitas dengan melakukan evaluasi kinerja jaringan kantor cabang guna mendorong pertumbuhan bisnis yang lebih efektif;
4. Melanjutkan dan meningkatkan inovasi produk dan layanan yang berpotensi pada nasabah (*customer-centric*);
5. Mengembangkan sistem teknologi informasi untuk mendukung efisiensi operasional, inovasi produk, serta peningkatan layanan;
6. Meningkatkan kualitas dan produktivitas sumber daya manusia serta pelayanan nasabah guna menghadapi tantangan bisnis yang semakin kompleks; dan
7. Meningkatkan nilai Bank bagi Pemegang Saham dan pemangku kepentingan melalui strategi bisnis yang solid dan berorientasi pada keberlanjutan.

Long-Term Plan

For the next 5 (five) years, the Bank has formulated business strategies that focus on sustainable growth and increased competitiveness. The strategies are described as follows:

1. Maintaining and strengthening the consistent implementation of GCG principles, that are aligned with the principles of risk management and regulatory compliance;
2. Ensuring the capital level remains strong and adequate as the foundation for prudent and sustainable development and growth of the Bank's business scale;
3. Optimizing efficiency and productivity by evaluating the performance of branch office network to encourage more effective business growth;
4. Continuing and improving product innovation and potential customer-centric services;
5. Developing information technology system to support operational efficiency, product innovation, and service improvement;
6. Improving the quality and productivity of human resources and customer service to face the increasingly complex business challenges; and
7. Increasing the Bank's value for Shareholders and stakeholders through solid and sustainability-oriented business strategies.

Rencana Jangka Menengah dan Pendek

Untuk jangka waktu 1 (satu) tahun ke depan (jangka pendek) dan 3 (tiga) tahun ke depan (jangka menengah), Bank telah menetapkan target yang dirumuskan sebagai berikut:

1. Penguatan GCG dan penerapan manajemen risiko, meliputi:
   a. Melanjutkan peningkatan internalisasi budaya kepatuhan secara berkelanjutan di seluruh aspek operasional dan bisnis Bank;
   b. Memperkuat fungsi pengawasan dan pengendalian risiko pada *second* dan *third line of defense*; dan
   c. Mencapai pertumbuhan bisnis yang berkelanjutan melalui penerapan dan pengelolaan GCG.
2. Permodalan, yaitu dengan memperkuat dan/atau memelihara permodalan yang sehat guna menyerap risiko serta mendukung pertumbuhan bisnis berkelanjutan, melalui peningkatan laba (organik) dan penerbitan obligasi subordinasi.
3. Pengembangan bisnis, meliputi:
   a. Menerbitkan 12 (dua belas) produk dasar dan 21 produk lanjutan, yang terdiri dari 5 (lima) produk lanjutan, 8 (delapan) produk lanjutan layanan elektronik, dan 8 (delapan) produk lanjutan layanan digital). Tujuan penerbitan produk ini adalah untuk mendorong pertumbuhan bisnis berkelanjutan, pengembangan produk berbasis nasabah (*customer-centric*) serta meningkatkan *fee-based income;*
   b. Meningkatkan kampanye pemasaran (*marketing campaign*) guna memperluas basis nasabah simpanan, terutama nasabah kecil untuk meningkatkan porsi dana murah serta menekan *cost of fund;*

Medium and Short-Term Plans

For the next 1 (one) year (short term) and 3 (three) years (medium term), the Bank has set targets formulated as follows:

1. Strengthening GCG and risk management implementation, including:
   a. Continuing to improve the internalization of compliance culture in all aspects of the Bank's operations and business;
   b. Strengthening the supervision and risk control functions at the second and third lines of defense; and
   c. Achieving sustainable business growth through the implementation and management of GCG.
2. Capitalization, namely by strengthening and/or maintaining healthy capital to absorb risks and support sustainable business growth, through increased (organic) profits and issuance of subordinated bonds.
3. Business development, including:
   a. Issuing 12 (twelve) basic products and 21 advanced products, consisting of 5 (five) advanced products, 8 (eight) electronic service advanced products, and 8 (eight) digital service advanced products). The purpose of the issuance of these products is to encourage sustainable business growth, customer-centric product development, and increase fee-based income;
   b. Enhancing marketing campaigns to expand the deposit customer base, particularly small customers, to increase the portion of low-cost funds and reduce the cost of funds;

c. Melanjutkan inisiatif kerja sama dalam pengembangan bisnis penyumbang *fee-based income* lainnya, terutama pada produk dan layanan *wealth management;* dan
d. Meningkatkan efektivitas penanganan kredit bermasalah, kredit hapus buku, penyelesaian agunan yang diambil alih, serta pemanfaatan aktiva tetap yang belum digunakan (properti terbengkalai) guna memelihara dan meningkatkan kualitas aset, mengoptimalkan produktivitas aktiva, serta meningkatkan pendapatan operasional selain bunga.

4. Penguatan sistem TI, yaitu dengan memperkuat kapasitas dan kualitas layanan infrastruktur TI guna menjamin keamanan dan menjaga kepercayaan nasabah dalam mendukung kegiatan operasional Bank.
5. Jaringan kantor, meliputi:
   a. Melanjutkan evaluasi kinerja jaringan kantor cabang guna mencapai tingkat profitabilitas yang optimal; dan
   b. Melakukan penambahan jaringan kantor untuk meningkatkan layanan nasabah serta memperluas pasar secara geografis guna mendukung pertumbuhan bisnis.
6. Sumber daya manusia dan organisasi, meliputi:
   a. Meningkatkan kualitas sumber daya manusia serta memperkuat perangkat organisasi melalui program pelatihan berkelanjutan dan rekrutmen tenaga yang sesuai dengan kebutuhan bisnis Bank dan regulasi; dan
   b. Meningkatkan kompetensi sumber daya manusia dalam menghadapi dinamika persaingan bisnis melalui peningkatan *soft skill* dan *hard skill*, *officer development program* dan program rekrutmen lainnya, dan pelatihan terencana setiap 3 (tiga) bulan sekali, termasuk pemenuhan sertifikasi dan *refreshment training*.
7. Memastikan pertumbuhan dan peningkatan nilai Bank bagi seluruh Pemegang Saham dan pemangku kepentingan melalui strategi bisnis yang terukur dan berkelanjutan.

c. Continuing collaborative initiatives in developing other fee-based income contributing businesses, particularly in wealth management products and services; and
d. Improving the effectiveness of handling non-performing loans, write-off loans, settlement of repossessed collateral, and utilization of unused fixed assets (abandoned properties) to maintain and improve asset quality, optimize asset productivity, and increase operating income other than interest.

4. Strengthening IT system, namely by strengthening the capacity and quality of IT infrastructure services to ensure security and maintain customer confidence to support the Bank's operational activities.
5. Office network, including:
   a. Continuing the performance evaluation of branch office to achieve optimal level of profitability; and
   b. Expanding office network to improve customer service and expand the market geographically to support business growth.
6. Human resources and organization, including:
   a. Improving the quality of human resources and strengthening organizational tools through continuous training programs and recruitment of personnel according to the Bank's business needs and regulations; and
   b. Improving the competence of human resources in facing the dynamics of business competition through the improvement of soft skills and hard skills, officer development program, other recruitment programs, and planned training every 3 (three) months, including the fulfillment of certification and refreshment training.
7. Ensuring the growth and increase in the Bank's value for all Shareholders and stakeholders through measurable and sustainable business strategies.

Pembelian Kembali Saham dan/atau Obligasi

Shares and/or Bonds Buy Back

Selama tahun 2024, Bank tidak melakukan pembelian kembali atas saham dan obligasi yang diterbitkan oleh Bank yang masih beredar di Bursa Efek Indonesia.

Throughout 2024, the Bank did not conduct shares and bonds buy back that is still circulating on Indonesia Stock Exchange.

Penyediaan Dana kepada Pihak Terkait dan/atau Penyediaan Dana Besar

Provision of Funds to Related Parties and/or Provision of Large Exposure

Dalam memberikan penyediaan dana kepada pihak terkait dan debitur dalam jumlah besar, Bank memperhatikan ketentuan di antaranya Peraturan Otoritas Jasa Keuangan No. 32/POJK.03/2018 tentang Batas Maksimum Pemberian Kredit dan Penyediaan Dana Besar bagi Bank Umum dan ketentuan internal Bank. Pada tahun 2024, penyediaan dana kepada pihak terkait Bank dan juga terhadap debitur inti Bank (tidak terkait) diungkapkan sebagai berikut:

In providing funds to related parties and debtors with large exposure, the Bank pays attention to provisions, including Financial Services Authority Regulation No. 32/POJK.03/2018 on Legal Lending Limit and Large Exposure for Commercial Banks, and the Bank's internal provisions. In 2024, the provisions of funds to the Bank's related parties and also to the Bank's core debtors (non-related) are disclosed as follows:

Penyediaan Dana **Provision of Fund**	**Debitur** **Debtor**	**Total** **(juta Rupiah / million Rupiah)**
Individu Individual	830	**23,951,599**
Kepada Pihak Terkait To Related Parties	14	**345,923**
Kepada Pihak Tidak Terkait To Non-Related Parties	816	**23,605,676**
Kelompok Group	52	**8,795,597**
Total	**882**	**32,747,196**

Kepatuhan Perpajakan

Tax Compliance

Bank Victoria sebagai entitas bisnis memiliki tanggung jawab dalam mematuhi regulasi perpajakan. Oleh karenanya, Bank melakukan pemotongan/pemungutan pajak terhadap setiap objek kena pajak, seperti Pajak Penghasilan (PPh) karyawan dan Pajak Pertambahan Nilai dan lain-lain (PPN). Bank juga menyampaikan dokumen kewajiban perpajakan, seperti Surat Pemberitahuan Pajak (SPT) tahunan maupun bulanan, serta dokumen kewajiban ke regulator dengan tepat waktu. Terkait hal ini, Bank menggunakan sistem dari Direktorat Jenderal Pajak untuk pelaporan pajak, sementara pencatatannya dilakukan di system *core banking* Bank.

Bank Victoria as a business entity has the responsibility to comply with tax regulations. Therefore, the Bank withholds/collects tax on every taxable object, such as employee Income Tax (PPh), Value Added Tax (VAT), and others. The Bank also submits tax obligation documents, such as annual and monthly Tax Returns (SPT), and obligation documents to regulators in a timely manner. In this regard, the Bank uses the system from the Directorate General of Taxes for tax reporting, while recording is done in the Bank's core banking system.

Transparansi Kondisi Keuangan dan Non-Keuangan Bank yang Belum Diungkap dalam Laporan Lain

Transparency of the Bank's Financial and Non-Financial Conditions that Have Not Been Disclosed in Other Report

Bank telah menetapkan kebijakan dan prosedur mengenai transparansi kondisi keuangan dan non-keuangan, yang di antaranya mengacu pada:

1. Peraturan Otoritas Jasa Keuangan No. 37/POJK.03/2019 tentang Transparansi dan Publikasi Laporan Bank;
2. Peraturan Otoritas Jasa Keuangan No. 29/POJK.04/2016 tentang Laporan Tahunan Emiten atau Perusahaan Publik;
3. Peraturan Otoritas Jasa Keuangan No. 14/POJK.04/2022 tentang Penyampaian Laporan Keuangan Berkala Emiten atau Perusahaan Publik; dan
4. Surat Edaran Otoritas Jasa Keuangan No. 16/SEOJK.04/2021 tentang Bentuk dan Isi Laporan Tahunan Emiten atau Perusahaan Publik.

Informasi mengenai kondisi keuangan dan non-keuangan Bank disajikan secara jelas dan transparan melalui berbagai laporan yang tersedia melalui media cetak maupun situs web Bank. Laporan-laporan tersebut meliputi Laporan Tahunan (keuangan dan non-keuangan), Laporan Keuangan Publikasi Triwulanan, dan Laporan Keuangan Publikasi Bulanan.

The Bank has established policies and procedures regarding transparency of financial and non-financial conditions, which include:

1. Financial Services Authority Regulation No. 37/POJK.03/2019 on Transparency and Publication of Bank Reports;
2. Financial Services Authority Regulation No. 29/POJK.04/2016 on Annual Report of Issuers or Public Companies;
3. Financial Services Authority Regulation No. 14/POJK.04/2022 on Submission of Periodic Financial Statements of Issuers or Public Companies; and
4. Financial Services Authority Circular No. 16/SEOJK.04/2021 on the Form and Content of Annual Reports of Issuers or Public Companies.

Information regarding the Bank's financial and non-financial conditions is presented clearly and transparently through various reports available through printed media and the Bank's website. These reports include (financial and non-financial) Annual Reports, Quarterly Published Financial Statements, and Monthly Published Financial Statements.

Informasi Lain Terkait Tata Kelola Bank

Other Information Related to Bank Governance

Bank berkomitmen untuk mengelola dan menjalankan kegiatan bisnis secara profesional dan transparan, tanpa adanya intervensi dari pemilik atau pihak eksternal lainnya, serta menghindari perselisihan internal dan masalah lain, terutama yang disebabkan oleh kebijakan remunerasi yang diterapkan. Sepanjang tahun 2024, Bank telah menjalankan proses bisnis sesuai dengan pedoman prinsip-prinsip GCG, Kode Etik, Peraturan Perusahaan, serta peraturan perundang-undangan yang berlaku, guna meminimalkan dampak negatif dari keputusan dan aktivitas operasional Bank.

The Bank is committed to managing and carrying out business activities professionally and transparently, without any intervention from the owner or other external parties, and avoiding internal disputes and other problems, particularly those caused by the remuneration policies applied. Throughout 2024, the Bank carried out business processes in accordance with guidelines on GCG principles, Code of Conduct, Company Regulations, and applicable laws and regulations, to minimize negative impacts of the Bank's decisions and operational activities.

Pernyataan dan Praktik *Bad Corporate Governance*

Statement and Practices of Bad Corporate Governance

Bank terus berupaya untuk menerapkan peraturan atau ketentuan terkait tata kelola perusahaan. Sepanjang tahun 2024, Bank tidak melakukan praktik *bad corporate governance* yang dapat mengganggu penerapan GCG sebagaimana ditunjukkan pada tabel berikut:

The Bank continuously strives to implement regulations or provisions related to corporate governance. Throughout 2024, the Bank did not carry out any bad corporate governance practices that could disrupt GCG implementation as presented in the following table:

Uraian Description	Praktik Practice
Adanya laporan sebagai Bank yang mencemari lingkungan. There is a report that the Bank pollutes the environment.	**Nihil** **None**
Perkara penting yang sedang dihadapi oleh Bank, anggota Direksi dan/atau anggota Dewan Komisaris yang sedang menjabat tidak diungkapkan dalam Laporan Tahunan. Significant cases currently faced by the Bank, members of Board of Directors, and/or members of Board of Commissioners are not disclosed in the Annual Report.	**Nihil** **None**
Ketidakpatuhan dalam pemenuhan kewajiban perpajakan. Non-compliance in fulfilling tax obligations.	**Nihil** **None**
Ketidaksesuaian penyajian Laporan Tahunan dan Laporan Keuangan dengan peraturan yang berlaku dan Standar akuntansi Keuangan. Inconsistency of presentation of Annual Report and Financial Statements with the the applicable regulations and Financial Accounting Standards.	**Nihil** **None**
Kasus terkait buruh dan karyawan. Cases related to workers and employees.	**Nihil** **None**
Tidak terdapat pengungkapan segmen operasi. There are no disclosures on operational segment.	**Nihil** **None**
Terdapat ketidaksesuaian antara Laporan Tahunan *hardcopy* dengan Laporan Tahunan *softcopy*. There is inconsistency between Annual Report's hard copy and Annual Report's softcopy.	**Nihil** **None**



Struktur Permodalan dan Manajemen Risiko

Capital Structure and Risk Management



Pengungkapan Permodalan
Disclosure of Capital

Bank memastikan ketersediaan modal yang memadai untuk mengatasi berbagai risiko dan peluang bisnis. Selain itu, Bank mematuhi ketentuan regulator terkait permodalan untuk menjaga stabilitas operasional dan meningkatkan kepercayaan dari para pemangku kepentingan. Langkah ini juga memungkinkan Bank untuk terus memperkuat daya saing dan berkontribusi terhadap pertumbuhan ekonomi secara berkelanjutan.

The Bank ensures the availability of adequate capital to address various business risks and opportunities. In addition, the Bank complies with regulatory provisions on capital to maintain its operational stability and increase stakeholder trust. This step also allows the Bank to continuously strengthen its competitiveness and give contribution to sustainable economic growth.

Kebijakan Manajemen Permodalan

Bank Victoria menerapkan kebijakan manajemen permodalan yang bertujuan untuk memastikan keberlanjutan modal yang kuat, menciptakan struktur permodalan yang optimal, dan mematuhi ketentuan regulator. Kebijakan ini dirancang agar Bank dapat terus mendukung strategi pengembangan usaha secara berkelanjutan. Kebijakan manajemen permodalan Bank mengacu pada Peraturan Otoritas Jasa Keuangan, antara lain:

1. Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2016 tanggal 2 Februari 2016;
2. Peraturan Otoritas Jasa Keuangan No. 34/POJK.03/2016 tanggal 26 September 2016, Perubahan Atas Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum Bank Umum; dan
3. Peraturan Otoritas Jasa Keuangan No. 27 Tahun 2022 tanggal 26 Desember 2022, Perubahan Kedua Atas Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum Bank Umum.

Kebijakan manajemen permodalan disusun sebagai bagian dari Rencana Bisnis Bank dan telah disetujui oleh Direksi serta Dewan Komisaris. Rencana permodalan Bank memastikan ketersediaan modal yang cukup untuk mendukung pertumbuhan usaha dan mencapai struktur permodalan yang optimal. Dalam perencanaannya, Bank mempertimbangkan ketentuan permodalan minimum yang diwajibkan oleh regulator, kebutuhan modal untuk mendukung ekspansi bisnis, serta berbagai opsi untuk meningkatkan modal.

Pengelolaan modal juga memperhatikan kondisi ekonomi, pasar, dan usaha, serta dilakukan melalui penilaian berkala (*internal capital adequacy assessment process*/ICAAP) guna memastikan kesiapan Bank dalam menghadapi kondisi normal maupun situasi stres.

Capital Management Policy

Bank Victoria implements the capital management policy that aims to ensure strong capital sustainability, create an optimal capital structure, and comply with regulatory requirements. This policy is designed to enable the Bank to continuously support its sustainable business development strategies. The Bank's capital management policy refers to the Financial Services Authority Regulations, including:

1. Financial Services Authority Regulation No. 11/POJK.03/2016 dated 2 February 2016;
2. Financial Services Authority Regulation No. 34/POJK.03/2016 dated 26 September 2016, Amendments to Financial Services Authority Regulation No. 11/POJK.03/2016 on Capital Adequacy Ratio for Commercial Banks; and
3. Financial Services Authority Regulation No. 27 of 2022 dated 26 December 2022, on Second Amendment to Financial Services Authority Regulation No. 11/POJK.03/2016 on Capital Adequacy Ratio for Commercial Banks.

The capital management policy is prepared as part of the Bank's Business Plan and has been approved by the Board of Directors and Board of Commissioners. The Bank's capital plan ensures the availability of sufficient capital to support its business growth and achieve an optimal capital structure. In its planning, the Bank considers the minimum capital requirements required by regulators, capital requirements to support business expansion, and various options to increase the capital.

Capital management also pays attention to economic, market, and business conditions. It is carried out through periodic assessments (internal capital adequacy assessment process/ICAAP) to ensure the Bank's readiness to deal with normal conditions and stressful situations.

Struktur Permodalan

Sesuai dengan ketentuan Otoritas Jasa Keuangan, struktur permodalan Bank Victoria terdiri dari 2 (dua) komponen utama, yaitu:

1. Modal inti (*tier* 1), yang meliputi:
   a. Modal inti utama (*common equity tier* 1)
      Modal inti utama mencakup modal disetor, cadangan tambahan modal (*disclosed reserve*), dan faktor pengurang modal inti utama. Cadangan tambahan modal terdiri atas faktor penambah (pendapatan komprehensif lainnya dan cadangan tambahan modal lainnya) dan faktor pengurang (pendapatan komprehensif lainnya dan cadangan tambahan modal lainnya); dan
   b. Modal inti tambahan (*additional tier* 1).
2. Modal pelengkap (*tier* 2)
   Modal pelengkap (*tier* 2) meliputi cadangan umum Penyisihan Penghapusan Aset (PPA) atas aset produktif yang wajib dibentuk (paling tinggi 1,25% Aset Tertimbang Menurut Risiko (ATMR) Risiko Kredit).

Per 31 Desember 2024, total modal Bank Victoria mencapai Rp4,42 triliun, dengan mayoritas berasal dari modal inti (*tier* 1) sebesar Rp3,58 triliun. Dibandingkan dengan total modal per 31 Desember 2023 sebesar Rp3,82 triliun, terjadi peningkatan sebesar 15,65%. Peningkatan ini terutama terjadi pada komponen modal pelengkap (*tier* 2) yang meningkat sebesar 56,50%. Dengan struktur permodalan ini, rasio Kewajiban Penyediaan Modal Minimum (KPMM) Bank pada 31 Desember 2024 tercatat sebesar 21,53%, lebih tinggi dibandingkan dengan rasio tahun sebelumnya yang sebesar 19,95%.

Kecukupan Permodalan

Bank Victoria memastikan kecukupan permodalan yang sesuai dengan ketentuan regulasi yang ditetapkan oleh Bank Indonesia dan Otoritas Jasa Keuangan, dengan mengacu pada standar Basel II dan Basel III (lebih dikenal sebagai reformasi Basel III). Langkah ini dilakukan untuk memastikan bahwa Bank mampu menjaga kecukupan modal yang lebih responsif terhadap risiko-risiko utama dalam kegiatan perbankan, sambil tetap memberikan imbal hasil yang optimal bagi para pemangku kepentingan. Pendekatan ini mencakup 3 (tiga) pilar utama, yaitu:

1. Pilar 1 (*Minimum Capital Requirements*)
   Sesuai dengan ketentuan regulasi, secara umum, metodologi yang digunakan dalam menilai kecukupan dan kebutuhan modal untuk risiko kredit, risiko pasar, dan risiko operasional.
2. Pilar 2 *(Supervisory Review Process)*
   Bank Victoria telah menerapkan *Internal Capital Adequacy Assessment Process* (ICAAP), yaitu proses untuk menetapkan kecukupan modal yang sesuai dengan profil risiko Bank, dan menetapkan strategi untuk memelihara tingkat permodalan.

Capital Structure

Pursuant to the provisions of Financial Services Authority, Bank Victoria's capital structure consists of 2 (two) main components, namely:

1. Tier 1, which includes:
   a. Common equity tier 1
      Common equity tier 1 includes paid-up capital, disclosed reserve, and impairment factor for common equity tier 1. Additional capital reserves consist of additional factors (other comprehensive income and other additional capital reserves) and deduction factors (other comprehensive income and other additional capital reserves); and
   b. Additional tier 1.
2. Tier 2
   Tier 2 includes general reserves of Allowance for Asset Losses (PPA) for productive assets that must be formed (a maximum of 1.25% Risk Weighted Assets (ATMR) Credit Risk).

As of 31 December 2024, the total capital of Bank Victoria reached Rp4.42 trillion, with its majority coming from core capital (tier 1) of Rp3.58 trillion. Compared to the total capital as of 31 December 2023 of Rp3.82 trillion, there was an increase of 15.65%. This increase mainly occurred in supplementary capital (tier 2) component which increased by 56.50%. With this capital structure, the Minimum Capital Adequacy Ratio (CAR) of the Bank as of 31 December 2024 was 21.53%, higher compared to the previous year's ratio of 19.95%.

Capital Adequacy

Bank Victoria ensures that the adequate capital is in accordance with the regulatory requirements set by Bank Indonesia and the Financial Services Authority, with reference to Basel II and Basel III standards (widely known as Basel III reforms). This step is taken to ensure that the Bank is able to maintain adequate capital that is more responsive to the main risks in banking activities, while still providing optimal returns for stakeholders. This approach includes 3 (three) main pillars, namely:

1. Pillar 1 (Minimum Capital Requirements)
   The method is generally used for assessing capital adequacy and requirements for credit risk, market risk, and operational risk, which follows regulatory provisions.
2. Pillar 2 (Supervisory Review Process)
   Bank Victoria has implemented the Internal Capital Adequacy Assessment Process (ICAAP), which is a process to determine the capital adequacy according to the Bank's risk profile and to determine a strategy to maintain capital rating.

3. Pilar 3 *(Market Discipline)*
   Bank Victoria menerapkan disiplin pasar melalui transparansi dan pengungkapan atas informasi keuangan Bank.

Penyesuaian terhadap implementasi Basel III, regulator telah mengeluarkan ketentuan mengenai kewajiban penyediaan modal minimum bank umum, di mana Bank wajib membentuk tambahan modal sebagai penyangga (*buffer*). Tambahan modal tersebut berupa:

1. *Capital Conservation Buffer*
   Penyangga untuk mengantisipasi terjadinya kerugian pada periode krisis.
2. *Countercyclical Buffer*
   Penyangga untuk mengantisipasi terjadinya kerugian apabila pertumbuhan kredit perbankan berlebihan yang berpotensi mengganggu stabilitas sistem keuangan.
3. *Capital Surcharge* untuk *Domestic Systemically Important Bank* (D-SIB).

Penyangga untuk mengurangi dampak negatif terhadap stabilitas sistem keuangan dan perekonomian apabila terjadi kegagalan Bank yang berdampak sistemik, melalui peningkatan kemampuan Bank dalam menyerap kerugian.

Bank Victoria telah menerapkan perhitungan kewajiban membentuk tambahan modal sebagai penyangga (*buffer*) dalam Kewajiban Penyedian Modal Minimum (KPMM) sesuai dengan ketentuan regulator. Sebagai Bank KBMI I (Kelompok Bank berdasarkan Modal Inti), Bank Victoria tidak diwajibkan untuk menyediakan *capital conservation buffer* karena ketentuan penyediaan modal tersebut berlaku untuk Bank KBMI II, KBMI III, dan KBMI IV.

Pengungkapan permodalan Bank Victoria sebagai berikut:

1. Tabel Utama (*Key Metrics*);
2. Tabel Perbedaan antara Cakupan Konsolidasi dan *Mapping* pada Laporan Keuangan sesuai Standar Akuntansi Keuangan dengan Kategori Risiko sesuai dengan Ketentuan Otoritas Jasa Keuangan Kategori Risiko (LI1);
3. Tabel Perbedaan Utama antara Nilai Tercatat sesuai Standar Akuntansi Keuangan dengan Nilai Eksposur sesuai dengan Ketentuan Otoritas Jasa Keuangan (LI2);
4. Tabel Penjelasan Mengenai Perbedaan antara Nilai Eksposur sesuai Standar Akuntansi Keuangan dengan Ketentuan Otoritas Jasa Keuangan (LIA);
5. Tabel Komposisi Permodalan (CC1);
6. Tabel Rekonsiliasi Permodalan (CC2);
7. Tabel Fitur Utama Instrumen Permodalan dan Instrumen TLAC - *Eligible* (CCA);
8. Tabel Rasio Pengungkit – Laporan Kewajiban Pemenuhan Rasio Pengungkit; dan
9. Tabel Rasio Pengungkit – Laporan Perhitungan Rasio Pengungkit.

3. Pillar 3 (Market Discipline)
   Bank Victoria applies market discipline through transparency and disclosure of the Bank's financial information.

Adjusting to the implementation of Basel III, the regulator has issued a provision on minimum capital adequacy ratio for commercial bank, in which the Bank is required to establish additional capital as a buffer. The additional capital can be in the
form of:

1. Capital Conservation Buffer
   A buffer to anticipate a loss in crisis period.
2. Countercyclical Buffer
   A buffer to anticipate losses in the event of excessive banking credit growth that potentially interferes with the financial system stability.
3. Capital Surcharge for Domestic Systemically Important Bank (D-SIB).

A buffer to reduce negative impacts on the financial system stability and economy in the event of Bank failure that has systemic impact, through the improvement of the Bank's ability to absorb losses.

Bank Victoria has applied the calculation of the requirement to form additional capital as a buffer in the Capital Adequacy Ratio (CAR) in accordance with the regulatory provisions. As a bank of KBMI I (Bank Groups Based on Core Capital I), Bank Victoria is not required to provide capital conservation buffer because the capital requirement provision applies to banks of KBMI II, KBMI III, and KBMI IV.

Bank Victoria's disclosure of capital is as follows:

1. Main Table (Key Metrics);
2. Table of Difference between Consolidated and Mapping Coverage on the Financial Statements in accordance with the Financial Accounting Standards with Risk Categories in accordance with the Financial Services Authority Provisions for Risk Category (LI1);
3. Table of Key Differences between Carrying Value in accordance with the Financial Accounting Standards and Exposure Value in accordance with the Financial Services Authority Regulations (LI2);
4. Table of Explanation on the Differences between the Exposure Values in accordance with the Financial Accounting Standards and Financial Services Authority Provisions (LIA);
5. Table of Capital Composition (CC1);
6. Table of Capital Reconciliation (CC2);
7. Table of Key Features of Capital instrument and TLAC instrument - Eligible (CCA);
8. Table of Leverage Ratio - Leverage Ratio Compliance Report; and
9. Table of Leverage Ratio - Leverage Ratio Calculation Report.

Manajemen Risiko
Risk Management

Seiring dengan pesatnya perkembangan bisnis, Bank Victoria terus menghadapi peningkatan risiko yang sejalan dengan ekspansi dan semakin kompleksnya operasional Bank, termasuk dalam implementasi digital banking yang saat ini tengah dikembangkan. Oleh karena itu, Bank dituntut untuk menerapkan manajemen risiko yang selaras dengan perkembangan bisnis, standar regulator, serta praktik terbaik di industri perbankan, guna memastikan operasional yang aman, efisien, dan berkelanjutan.

Manajemen risiko merupakan elemen penting untuk memastikan bahwa seluruh pemangku kepentingan di Bank memiliki kesadaran yang tinggi terhadap risiko (*risk awareness*) serta pemahaman yang jelas mengenai tantangan risiko yang dihadapi. Dengan manajemen risiko yang tepat, Bank dapat mengidentifikasi, mengukur, memantau, dan mengendalikan risiko secara efektif, guna menjaga keberlanjutan usaha.

Bank Victoria secara aktif terus meningkatkan penerapan manajemen risiko untuk memitigasi potensi gangguan pada kegiatan operasional, menjaga stabilitas keuangan, dan mencapai tujuan bisnis secara berkelanjutan.

Along with the rapid development of business, Bank Victoria continues to face increasing risks in line with the expansion and increasing complexity of the Bank's operations, including in digital banking implementation which is currently being developed. Therefore, the Bank is required to implement risk management in line with business developments, regulatory standards, and best practices in banking industry, in order to ensure safe, efficient, and sustainable operations.

Risk management is an important element to ensure that all stakeholders in the Bank have a high level of risk awareness and a clear understanding of the risk challenges being faced. With proper risk management, the Bank can identify, measure, monitor, and control risks effectively, in order to maintain its business sustainability.

Bank Victoria actively continues to improve risk management implementation to mitigate potential disruptions to operational activities, maintain financial stability, and achieve business goals sustainably.

Dasar Penerapan Manajemen Risiko

Dasar penerapan manajemen risiko di Bank mengacu pada beberapa peraturan berikut:

1. Peraturan Otoritas Jasa Keuangan No. 4/POJK.03/2016 tentang Penilaian Tingkat Kesehatan Bank Umum;
2. Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum;
3. Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum;
4. Peraturan Otoritas Jasa Keuangan No. 22 Tahun 2023 tentang Perlindungan Konsumen dan Masyarakat di Sektor Jasa Keuangan;
5. Peraturan Otoritas Jasa Keuangan No. 15 Tahun 2024 tentang Integritas Pelaporan Keuangan Bank;
6. Peraturan Otoritas Jasa Keuangan No. 19 Tahun 2024 tentang Perubahan atas Peraturan Otoritas Jasa Keuangan No. 42/POJK.03/2015 tentang Kewajiban Pemenuhan Rasio Kecukupan Likuiditas (*Liquidity Coverage Ratio*) Bagi Bank Umum;
7. Peraturan Otoritas Jasa Keuangan No. 20 Tahun 2024 tentang Perubahan atas Peraturan Otoritas Jasa Keuangan No. 50/POJK.03/2017 tentang Kewajiban Pemenuhan Rasio Pendanaan Stabil Bersih (*Net Stable Funding Ratio*) bagi Bank Umum;
8. Surat Edaran Otoritas Jasa Keuangan No. 34/SEOJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum;

Basis of Risk Management Implementation

The basis of risk management implementation in the Bank refers to the following regulations:

1. Financial Services Authority Regulation No. 4/POJK.03/2016 on Sound Level Assessment for Commercial Banks;
2. Financial Services Authority Regulation No. 18/POJK.03/2016 on Implementation of Risk Management for Commercial Banks;
3. Financial Services Authority Regulation No. 17 of 2023 on Implementation of Governance for Commercial Banks;
4. Financial Services Authority Regulation No. 22 of 2023 on Consumer and Community Protection in the Financial Services Sector;
5. Financial Services Authority Regulation No. 15 of 2024 on Integrity of Financial Reporting of the Bank;
6. Financial Services Authority Regulation No. 19 of 2024 on Amendment to Financial Services Authority Regulation No. 42/POJK.03/2015 on Obligation of Fulfillment of Liquidity Coverage Ratio for Commercial Banks;
7. Financial Services Authority Regulation No. 20 of 2024 on Amendment to Financial Services Authority Regulation No. 50/POJK.03/2017 on Obligation of Fulfillment of Net Stable Funding Ratio for Commercial Banks;
8. Financial Services Authority Circular No. 34/SEOJK.03/2016 on Risk Management Implementation for Commercial Banks;

9. Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tentang Penerapan Tata Kelola bagi Bank Umum; dan
10. Surat Edaran Otoritas Jasa Keuangan No. 14/SEOJK.03/2017 tentang Penilaian Tingkat Kesehatan Bank Umum.

Penerapan Manajemen Risiko Bank

Bank senantiasa berupaya untuk meningkatkan kualitas implementasi manajemen risiko guna menjadi mitra bisnis yang terpercaya dengan menyediakan kerangka kerja manajemen risiko, mempromosikan *risk culture*, serta menarik talenta untuk mendukung pertumbuhan bisnis yang berkelanjutan. Dalam penerapan manajemen risiko, Bank berpedoman pada Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum, di mana Bank menerapkan manajemen risiko secara efektif melalui 4 (empat) pilar yang terdiri dari:

1. Pengawasan aktif Dewan Komisaris dan Direksi;
2. Kecukupan kebijakan, prosedur, dan penetapan limit manajemen risiko;
3. Kecukupan proses identifikasi, pengukuran, pemantauan, pengendalian, dan sistem informasi manajemen risiko; dan
4. Sistem pengendalian internal terhadap penerapan manajemen risiko.

Pengawasan Aktif Dewan Komisaris dan Direksi

Tata kelola manajemen risiko senantiasa mengacu pada Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum, Dewan Komisaris dan Direksi secara aktif melakukan pengawasan dan mitigasi serta mengembangkan budaya manajemen risiko di Bank. Adapun tugas dan tanggung jawab Dewan Komisaris sebagai berikut:

1. Melakukan pengawasan untuk kepentingan Bank atas kebijakan dan jalannya pengurusan Direksi, memberikan nasihat kepada Direksi, dan bertanggung jawab atas pengawasan tersebut;
2. Melaksanakan tugas, wewenang, dan tanggung jawab dengan iktikad baik dan dengan prinsip kehati-hatian; dan
3. Memberikan arahan, memantau, dan mengevaluasi pelaksanaan tata kelola, manajemen risiko, dan kepatuhan secara terintegrasi serta kebijakan strategis Bank.

Dewan Komisaris dalam menjalankan fungsinya sebagai pengawasan secara aktif dibantu oleh Komite Audit, Komite Pemantau Risiko, dan Komite Remunerasi dan Nominasi. Sementara itu, tugas dan tanggung jawab Direksi sebagai berikut:

1. Menyusun kebijakan dan strategi manajemen risiko secara tertulis dan komprehensif;
2. Memiliki tanggung jawab atas pelaksanaan kebijakan manajemen risiko dan eksposur risiko yang diambil oleh Bank secara keseluruhan;
3. Mengevaluasi dan memutuskan transaksi yang memerlukan persetujuan Direksi;

9. Financial Services Authority Circular No. 13/SEOJK.03/2017 on Implementation of Governance for Commercial Banks; and
10. Financial Services Authority Circular No. 14/SEOJK.03/2017 on Sound Level Assessment for Commercial Banks.

Implementation of Bank Risk Management

The Bank always strives to improve the quality of risk management implementation to become a trusted business partner by providing risk management framework, promoting risk culture, and attracting talent to support sustainable business growth. In implementing risk management, the Bank refers to the Financial Services Authority Regulation No. 18/POJK.03/2016 on Implementation of Risk Management for Commercial Banks, in which the Bank effectively implements risk management through 4 (four) pillars consisting of:

1. Active monitoring of Board of Commissioners and Board of Directors;
2. Adequacy of risk management policies, procedures, and limit setting;
3. Adequacy of process of risk identification, measurement, monitoring, and managament, as well as risk management information system; and
4. Internal control system on risk management implementation.

Active Monitoring of Board of Commissioners and Board of Directors

Risk management governance refers to the Financial Services Authority Regulation No. 17 of 2023 on Implementation of Governance for Commercial Banks, the Board of Commissioners and Board of Directors actively supervise, mitigate, and develop risk management culture within the Bank. Duties and responsibilities of the Board of Commissioners are as follows:

1. Supervise in the interests of the Bank over the policies and management of the Board of Directors, provide advice to the Board of Directors, and be responsible for such supervision;
2. Perform duties, authorities, and responsibilities in good faith and with prudential principles; and
3. Provide direction, monitor, and evaluate the implementation of integrated governance, risk management, and compliance, as well as the Bank's strategic policies.

In performing its supervisory function, the Board of Commissioners is actively assisted by the Audit Committee, Risk Monitoring Committee, and Remuneration and Nomination Committee. Meanwhile, duties and responsibilities of the Board of Directors are as follows:

1. Develop written and comprehensive risk management policies and strategies;
2. Is responsible for the implementation of risk management policies and risk exposure taken by the Bank as a whole;
3. Evaluate and decide on transactions requiring approval from the Board of Directors;

4. Mengembangkan budaya manajemen risiko pada seluruh jenjang organisasi;
5. Memastikan peningkatan kompetensi sumber daya manusia yang terkait dengan manajemen risiko; dan
6. Memastikan bahwa fungsi manajemen risiko telah beroperasi secara independen.

Direksi dibantu oleh *Executive Committee* terkait Manajemen Risiko, seperti Komite Manajemen Risiko, Komite Kredit, ALCO, Komite Pengarah Teknologi Informasi, Komite Pengadaan, Komite Pemantau dan Pelaksanaan GCG, Komite Personalia, Komite Produk, dan Komite Kebijakan Perkreditan. Penerapan manajemen risiko bukan hanya tanggung jawab Dewan Komisaris dan Direksi, tetapi juga seluruh jenjang organisasi sesuai dengan fungsi dan tanggung jawabnya, serta menganut konsep *Three Lines of Defense.*

Kecukupan Kebijakan, Prosedur, dan Penetapan Limit Manajemen Risiko

Pengelolaan risiko di Bank Victoria didukung dengan kerangka kerja manajemen risiko, yang merupakan kebijakan tertinggi dalam penerapan manajemen risiko di Bank. Kerangka ini disusun sejalan dengan visi, misi, strategi bisnis Bank, *risk appetite*, dan *risk tol*erance, dengan memperhatikan kapasitas modal Bank dalam menyerap eksposur risiko yang mungkin timbul.

Sebagai pelengkap dari kerangka manajemen risiko, Bank juga menyusun kebijakan dan prosedur penerapan manajemen risiko yang menjadi pedoman tertulis dalam setiap aktivitas fungsional Bank. Kebijakan ini mencakup pengaturan mengenai penetapan limit risiko, baik pada level portofolio maupun transaksional guna memastikan pengelolaan risiko yang efektif dan selaras dengan standar perbankan yang berlaku. Seluruh kebijakan dan prosedur di Bank merupakan bentuk pengelolaan risiko yang melekat pada setiap aktivitas operasional di Bank yang dikinikan secara berkala dengan memperhatikan kompleksitas kegiatan usaha, profil risiko, dan keterkaitan antar risiko, serta peraturan yang ditetapkan otoritas dan/atau praktik perbankan yang sehat.

Dalam rangka pengendalian risiko secara efektif, kebijakan dan prosedur didasarkan pada strategi manajemen risiko dan dilengkapi dengan toleransi risiko dan limit risiko. Penetapan toleransi dan limit risiko telah memperhatikan tingkat risiko yang akan diambil dan strategi secara keseluruhan. Perihal penetapan limit didasarkan atas limit secara keseluruhan, limit per jenis risiko, dan limit per aktivitas fungsional tertentu yang memiliki eksposur risiko disesuaikan dengan kompleksitas dan usaha Bank serta kepatuhan terhadap ketentuan yang berlaku. Sedangkan, dalam penyusunan dan pengajuan limit diusulkan oleh unit kerja (*risk taking unit*) dan disampaikan kepada *Risk Management/Integrated* untuk dievaluasi dan diajukan kepada Komite Manajemen Risiko atau ALCO. Selanjutnya, toleransi dan limit risiko direkomendasikan kepada Direktur Utama untuk mendapatkan persetujuan dengan sepengetahuan Dewan Komisaris.

4. Develop a risk management culture at all levels of the organization;
5. Ensure increased competency of human resources related to risk management; and
6. Ensure that the risk management function operates independently.

The Board of Directors is assisted by an Executive Committee related to Risk Management, such as the Risk Management Committee, Credit Committee, ALCO, Information Technology Steering Committee, Procurement Committee, GCG Monitoring and Implementation Committee, Personnel Committee, Product Committee, and Credit Policy Committee. Risk management implementation is not only the responsibility of the Board of Commissioners and Board of Directors, but also all levels of the organization in accordance with their functions and responsibilities, and adhering to the Three Lines of Defense concept.

Adequacy of Policies, Procedures, and Limit Establishment of Risk Management

Risk management at Bank Victoria is supported by risk management framework, which is the highest policy in implement risk management at the Bank. This framework is prepared in line with the Bank's vision, mission, business strategy, risk appetite, and risk tolerance, with due observance of the Bank's capital capacity in absorbing possible risk exposure.

As a complement to the risk management framework, the Bank also prepares policies and procedures for implementing risk management that serve as written guidelines in every functional activity of the Bank. These policies include regulations regarding the determination of risk limits, both at portfolio and transactional levels to ensure an effective risk management and to comply with the applicable banking standards. All policies and procedures at the Bank are a form of risk management inherent in every operational activity at the Bank, updated periodically by considering the complexity of business activities, risk profile, interrelationship between risks, and regulations set by the authorities, and/or sound banking practices.

To control risk effectively, policies and procedures are based on risk management strategies and equipped with risk tolerances and risk limits. Determination of risk tolerance and limits has considered the risk appetite and overall strategy. Limits are determined based on overall limits, limits per type of risk, and limits per certain functional activities that have risk exposure adjusted to the Bank's complexity and business as well as compliance with applicable regulations. Whereas, limits are prepared and proposed by risk taking unit and submitted to the Risk Management/Integrated to be evaluated and proposed to the Risk Management Committee or ALCO. Furthermore, risk tolerance and risk limits are recommended to the President Director for approval under acknowledgment of the Board of Commissioners.

Kecukupan Proses Identifikasi, Pengukuran, Pemantauan, Pengendalian, dan Sistem Informasi Manajemen Risiko

Proses manajemen risiko meliputi tahapan berikut:

1. Identifikasi
   Identifikasi risiko merupakan proses untuk menentukan risiko yang melekat pada aktivitas Bank berpotensi menghambat pencapaian tujuan. Identifikasi risiko Bank dilakukan melalui analisis terhadap seluruh jenis risiko, terutama kompleksitas dan karakteristik risiko yang melekat yang berpotensi merugikan Bank.
2. Pengukuran
   Tujuan pengukuran risiko adalah untuk mengukur tingkat risiko yang melekat pada aktivitas Bank dan dampaknya terhadap permodalan, pendapatan, dan/atau strategi Bank. Pengukuran risiko Bank dilakukan secara berkala, baik untuk produk dan portofolio maupun seluruh aktivitas bisnis Bank yang bertujuan untuk mengukur eksposur risiko Bank sebagai acuan di dalam pengendalian risiko.
3. Pemantauan
   Pemantauan risiko adalah proses untuk mengetahui, mengevaluasi potensi tingkat risiko dan efektivitas respons yang dijalankan di Bank. Pemantauan risiko Bank antara lain mencakup besarnya eksposur risiko, toleransi risiko, kepatuhan limit internal, hasil *stress testing*, dan konsistensi pelaksanaan dengan kebijakan dan prosedur yang ditetapkan dan peraturan terkait eksternal lainnya. Pemantauan didukung oleh sistem informasi manajemen risiko dan disesuaikan dengan kebutuhan dalam rangka penerapan manajemen risiko yang efektif.
4. Pengendalian
   Pengendalian risiko adalah metode yang digunakan Bank untuk mengevaluasi potensi kerugian dan tindakan yang dilakukan untuk menerima, mengurangi, mengalihkan, atau menghilangkan risiko. Pengendalian risiko Bank dilakukan antara lain dengan memberikan tindak lanjut atas risiko yang bersifat material dan signifikan, pengawasan melekat, dan pelaksanaan audit internal secara berkala.

Penerapan proses manajemen risiko didukung oleh sistem informasi yang memadai dan dikembangkan sesuai dengan kebutuhan Bank dalam rangka penerapan manajemen risiko yang efektif. Sistem informasi manajemen risiko dan informasi yang dihasilkan disesuaikan dengan karakteristik dan kompleksitas kegiatan usaha Bank, serta adaptif terhadap perubahan.

Sistem Pengendalian Internal Terhadap Penerapan Manajemen Risiko

Bank menerapkan sistem pengendalian *intern* secara efektif dan mengacu kepada kebijakan dan prosedur yang ditetapkan. Prinsip pemisahan fungsi harus memadai dan dilaksanakan secara konsisten. Sistem pengendalian internal dalam penerapan manajemen risiko sekurang-kurangnya mencakup:

1. Pengelolaan dan pengendalian risiko yang melekat pada kegiatan usaha Bank;
2. Pelaporan keuangan dan kegiatan operasional yang akurat dan tepat waktu;

Adequacy of Identification, Measurement, Monitoring, and Control Processes, as well as Risk Management Information System

The risk management process includes the following stages:

1. Identification
   Risk identification is a process to determine inherent risks within the Bank's activities with potential to hinder the achievement of the Bank's objectives. The Bank's risk identification is carried out through the analysis of all types of risk, particularly the complexity and characteristics of inherent risks that may potentially harm the Bank.
2. Measurement
   The risk measurement is aimed to measure the level of inherent risk within the Bank's activities and its impact on the Bank's capital, income, and/or strategy. The Bank's risk measurement is carried out periodically, either for products or portfolios or all business activities intended to measure the Bank's risk exposure as a reference in risk control.
3. Monitoring
   Risk monitoring is a process for finding out, evaluating the level of potential risk, and effectiveness of responses carried out at the Bank. The Bank's risk monitoring includes the magnitude of risk exposure, risk tolerance, internal limit compliance, stress testing results, and consistent implementation with the established policies, procedures, and other external related regulations. Monitoring is supported by the risk management information system, which is tailored to needs in order to implement effective risk management.
4. Control
   Risk control is the method used by the Bank to evaluate potential loss and actions to be taken to accept, reduce, transfer, or eliminate risks. The risk control of the Bank is carried out by following up on material and significant risks, attached monitoring, and conducting internal audits periodically.

The risk management process is supported by information system that is adequate and developed in accordance with the Bank's needs in order to implement effective risk management. The risk management information system and the information generated are adapted to the characteristics and complexity of the Bank's business activities, as well as adaptive to changes.

Internal Control System on Risk Management Implementation

The Bank implements an effective internal control system, which refers to the established policies and procedures. The principle of separation of functions shall be adequate and implemented consistently. The internal control system in implementing risk management must at least include:

1. Managing and controlling risk inherent in the Bank's business activities;
2. Accurate and timely reporting of financial and operational activities;

3. Peningkatan kepatuhan terhadap ketentuan yang berlaku;
4. Pengurangan dampak kerugian keuangan, penyimpangan termasuk kecurangan (*fraud*), dan pelanggaran;
5. Peningkatan efektivitas organisasi dan meningkatkan efisiensi biaya;
6. Pengelolaan risiko agar tetap dalam batas toleransi (*risk tolerance*) dan *risk appetite* sesuai ukuran dan kompleksitas usaha;
7. Pengkajian ulang terhadap sistem informasi manajemen risiko; dan
8. Verifikasi dan pengkajian ulang secara berkala dan berkesinambungan terhadap permasalahan yang bersifat material dan tindakan untuk memperbaiki permasalahan yang terjadi.

Evaluasi terhadap efektivitas penerapan sistem pengendalian internal dilakukan secara terus menerus dan berkesinambungan agar Bank dapat memantau dan memitigasi risiko-risiko yang dihadapi secara efektif. Hasil evaluasi tersebut dijadikan dasar untuk perbaikan dan penyempurnaan sistem ataupun kebijakan pengendalian internal.

Strategi Penerapan Manajemen Risiko

Strategi manajemen risiko Bank disusun dengan menetapkan *risk appetite* dan *risk tolerance* yang jelas, mencerminkan keseimbangan antara risiko dan pengembalian. Strategi ini diterapkan melalui tahapan identifikasi, pengukuran, pemantauan, dan pengendalian risiko, serta melalui pengaturan tata kelola risiko yang efektif. Bank menerapkan strategi manajemen risiko dengan orientasi jangka panjang guna memastikan kelangsungan bisnis, menghasilkan laba yang berkelanjutan, dan menciptakan nilai bagi seluruh pemangku kepentingan. Penyusunan strategi ini mempertimbangkan berbagai faktor internal dan eksternal yang dapat memengaruhi operasional Bank.

Sebagai bagian dari rencana bisnis Bank, strategi manajemen risiko harus dikomunikasikan secara efektif oleh Direksi kepada seluruh karyawan agar dapat dipahami dan diimplementasikan dengan baik. Direksi juga melakukan pengkajian berkala terhadap strategi manajemen risiko, termasuk dampaknya terhadap kinerja keuangan, serta melakukan penyesuaian strategi bila diperlukan.

Penyusunan strategi manajemen risiko didasarkan pada prinsip-prinsip risiko, yang mencakup pernyataan (*statement*) mengenai pendekatan manajemen risiko dan budaya risiko yang ingin dipertahankan oleh Bank. Selain itu, strategi ini juga memastikan bahwa Bank dapat mencapai tujuan bisnisnya secara konsisten, menghasilkan keuntungan yang berkelanjutan, serta memaksimalkan kepentingan para pemangku kepentingan.

Strategi manajemen risiko senantiasa dilakukan Bank, baik dari segi struktur organisasi dan sumber daya manusia, kebijakan dan prosedur, maupun sistem pendukung agar sesuai dengan perkembangan aktivitas perbankan yang semakin beragam dan kompleks. Usaha tersebut dilakukan Bank agar dapat mengelola risiko yang dihadapi, melakukan upaya pencegahan atau mitigasi,

3. Improving compliance with applicable regulations;
4. Reducing the impact of financial loss, irregularities including fraud, and violation;
5. Improving organization effectiveness and improving cost efficiency;
6. Managing risk in order to remain within the limits of risk tolerance and risk appetite according to the business size and complexity;
7. Reviewing the risk management information system; and
8. Verifying and reviewing material problems and actions to rectify occurring problems, periodically and continuously.

Evaluation of the effectiveness of internal control system is performed continuously and ongoing so that the Bank can monitor and mitigate the risks effectively. Such evaluation result is used as a basis for improving and refining the system and internal control policy.

Risk Management Implementation Strategy

The Bank's risk management strategy is prepared by establishing a clear risk appetite and risk tolerance, reflecting the balance between risk and return. This strategy is implemented through the stages of risk identification, measurement, monitoring, and control, as well as through effective risk governance arrangements. The Bank implements risk management strategy with a long-term orientation to ensure business sustainability, generate sustainable profits, and create value for all stakeholders. This strategy is prepared by considering various internal and external factors that may affect the Bank's operations.

As part of the Bank's business plan, the risk management strategy must be communicated effectively by the Board of Directors to all employees for it to be understood and implemented properly. The Board of Directors also regularly reviews the risk management strategy, including its impact on financial performance, and makes adjustments to the strategy if necessary.

The risk management strategy is prepared based on risk principles, which include statements on the approach to risk management and risk culture that the Bank wishes to maintain. Furthermore, this strategy also ensures that the Bank can achieve its business objectives consistently, generate sustainable profits, and maximize the interests of stakeholders.

The Bank constantly performs risk management strategy, either on the organizational structure and human resources, policy and procedure, or on the supporting system to be in line with the development of banking's activities that are more various and complex. The effort is made by the Bank in order to manage the risks, to prevent and mitigate, and to reserve capital to assist the Bank in

serta mencadangkan modal, sehingga membantu Bank dalam merencanakan arah pertumbuhan bisnis di masa depan. Perbaikan dan peningkatan pengelolaan dilakukan melalui:

1. Menjaga eksposur risiko secara keseluruhan (*aggregate*) maupun per jenis risiko dengan mempertimbangkan keterkaitan antar risiko;
2. Evaluasi dan penyempurnaan pengukuran risiko secara berkala atau sewaktu-waktu apabila diperlukan untuk memastikan kesesuaian akurasi, kewajaran, serta prosedur yang digunakan untuk mengukur risiko; dan
3. Analisa dan evaluasi kecenderungan terhadap perubahan faktor-faktor yang memengaruhi kinerja Bank, baik faktor internal maupun eksternal.

Pada prinsipnya, pengelolaan risiko dilakukan secara proaktif guna mencapai pertumbuhan kinerja keuangan maupun kelangsungan bisnis Bank yang sehat dan berkelanjutan serta memelihara tingkat *risk adjusted return* secara optimal sesuai dengan *risk appetite* yang ditetapkan.

Struktur Tata Kelola Risiko

Dalam rangka penerapan tata kelola manajemen risiko, Bank menetapkan tugas dan tanggung jawab Dewan Komisaris, Direksi, dan berbagai komite yang dibentuk sesuai dengan ketentuan regulator dan tingkat kompleksitas Bank. Adapun tugas dan tanggung jawabnya sebagai berikut:

1. Dewan Komisaris
   a. Mengevaluasi dan menyetujui kebijakan manajemen risiko;
   b. Memastikan penerapan manajemen risiko telah memadai dengan karakteristik, kompleksitas usaha, dan profil risiko Bank;
   c. Mengevaluasi pertanggungjawaban Direksi atas pelaksanaan kebijakan manajemen risiko; dan
   d. Memastikan kebijakan dan proses manajemen risiko dilaksanakan secara efektif dan terintegrasi dalam proses manajemen secara keseluruhan.
2. Direksi
   a. Menyusun kebijakan dan strategi manajemen risiko secara tertulis dan komprehensif;
   b. Bertanggung jawab atas pelaksanaan kebijakan manajemen risiko dan eksposur risiko yang diambil oleh Bank secara keseluruhan;
   c. Menindaklanjuti dan menyampaikan laporan pertanggungjawaban atas pelaksanaan manajemen risiko kepada Dewan Komisaris melalui Komite Pemantau Risiko;
   d. Mengembangkan budaya manajemen risiko, termasuk kesadaran risiko di seluruh jenjang organisasi; dan
   e. Memastikan fungsi manajemen risiko telah diterapkan secara independen, yang tercermin dalam pemisahan fungsi antara Satuan Kerja Manajemen Risiko yang melakukan identifikasi, pengukuran, pemantauan, dan pengendalian risiko, terhadap *risk taking unit* yang menjalankan kegiatan bisnis.

planning the future direction of the business growth. Improvement and refinement of risk management are conducted as follows:

1. Maintaining an aggregate risk exposure or per type of risk by considering the interrelationships among the risks;
2. Evaluating and refining the risk measurement on a regular basis or at any time as necessary to ensure conformity of accuracy, reasonableness, and procedures used to measure risks; and
3. Analyzing and evaluating trends towards changes in factors affecting the Bank's performance, both internal and external factors.

In principle, risk management is carried out proactively in order to achieve sound and sustainable growth in financial performance and business continuity of the Bank and to maintain an optimal level of risk adjusted return in accordance with the established risk appetite.

Risk Governance Structure

To implement risk management governance, the Bank determines the duties and responsibilities of the Board of Commissioners, Board of Directors, and various committees established in accordance with regulatory requirements and the Bank's level of complexity. The duties and responsibilities are as follows:

1. Board of Commissioners
   a. Evaluating and approving risk management policies;
   b. Ensuring that risk management is implemented adequately with the Bank's characteristics, business complexity, and risk profile;
   c. Evaluating the Board of Directors' accountability for the implementation of risk management policies; and
   d. Ensuring that risk management policies and processes are implemented effectively and integrated into the overall management process.
2. Board of Directors
   a. Developing written and comprehensive risk management policies and strategies;
   b. Being responsible for the implementation of risk management policies and risk exposure taken by the Bank as a whole;
   c. Following up and submitting accountability reports on the implementation of risk management to the Board of Commissioners through the Risk Monitoring Committee;
   d. Developing risk management culture, including risk awareness at all organizational levels; and
   e. Ensuring that the risk management function is implemented independently, which is reflected in the separation of functions between the Risk Management Work Unit that identifies, measures, monitors, and controls risks, and the risk taking unit that carries out business activities.

3. Komite Manajemen Risiko merupakan komite eksekutif di bawah Direksi yang bertanggung jawab memastikan efektivitas kerangka kerja manajemen risiko dan implementasinya dalam mendukung strategi bisnis. Komite Manajemen Risiko juga bertanggung jawab untuk mengevaluasi dan merekomendasikan kebijakan manajemen risiko, termasuk strategi, *risk appetite*, toleransi risiko, limit risiko, kerangka kerja manajemen risiko, dan rencana kontingensi untuk mengantisipasi kondisi abnormal, serta memastikan eksposur risiko untuk semua jenis risiko di Bank tetap dalam batas yang sesuai dengan *risk appetite*.
4. Komite Pemantau Risiko bertujuan untuk membantu Dewan Komisaris dalam pemantauan implementasi manajemen risiko dan mengevaluasi pelaksanaan kebijakan manajemen risiko di tingkat eksekutif.
5. Komite Kredit merupakan suatu komite yang beranggotakan pemegang kewenangan kredit/pemegang kewenangan keputusan kredit, termasuk restrukturisasi kredit yang terdiri dari perwakilan *Business Division, Special Asset Management* (SAM) *Division,* dan *Credit Risk Review Division,* di mana kewenangan pemutusan kredit hanya diberikan kepada individu dengan kapabilitas, kompetensi, dan integritas yang memadai.
6. Komite Kebijakan Perkreditan merupakan komite yang membantu Direksi dalam merumuskan kebijakan perkreditan agar pemberian kredit dilakukan dengan prinsip kehati-hatian, memantau dan mengevaluasi pelaksanaan kebijakan perkreditan, perkembangan portofolio kredit, serta memberikan saran atau solusi sebagai langkah perbaikan. Komite Kebijakan Perkreditan bertanggung jawab atas pengawasan dan persetujuan terkait kebijakan, prosedur, serta parameter risiko kredit.
7. *Risk Management/Integrated* merupakan satuan kerja independen dari risk taking unit dan unit pengendalian internal yang bertanggung jawab kepada Direktur yang membawahi manajemen risiko.

Informasi lebih rinci terkait Komite Pemantau Risiko, Komite Manajemen Risiko, Komite Kredit, dan Komite Kebijakan Perkreditan telah disampaikan pada bab Tata Kelola Perusahaan dalam Laporan Tahunan ini.

Seluruh manajemen dan karyawan Bank Victoria memiliki peran dan tanggung jawab dalam penerapan, kepatuhan, serta peningkatan sistem pengendalian internal di Bank. Hal ini tercermin dalam konsep *Three Lines of Defenses*, yang telah diimplementasikan di seluruh lini organisasi guna memastikan pengelolaan risiko yang efektif dan menyeluruh.

Dalam penerapannya, struktur dengan pembagian tugas dan tanggung jawab dalam proses pengelolaan risiko dibagi menjadi 3 (*tiga*) yang meliputi:

1. Lini 1: memiliki anggota dan mengelola risiko sehari-hari yang melekat dalam bisnis dan/atau kegiatannya, termasuk pengambilan risiko. Termasuk mengidentifikasi, menilai, mengendalikan, memitigasi, memantau, dan melaporkan

3. Risk Management Committee is an executive committee under the Board of Directors that is responsible for ensuring the effectiveness of risk management framework and implementation in supporting business strategy. Risk Management Committee is also responsible for evaluating and recommending risk management policies, including strategies, risk appetite, risk tolerance, risk limits, risk management framework, and contingency plans to anticipate abnormal conditions, as well as ensuring risk exposure for all types of risk in the Bank remains within limits in accordance with the risk appetite.
4. Risk Monitoring Committee aims to assist the Board of Commissioners in monitoring the risk management implementation and evaluating the implementation of risk management's policies at executive level.
5. Credit Committee is a committee consisting of authority holders of credit/authority holders of credit decision, including credit restructuring which consists of representatives from Business Division, Special Asset Management (SAM) Division, and Credit Risk Review Division, in which the authority to terminate credit is only given to individual with adequate capability, competence, and integrity.

6. Credit Policy Committee is a committee that assists the Board of Directors in formulating credit policies, so as credit provision is carried out with prudential principle, monitoring and evaluating the implementation of credit policies, credit portfolio development, and providing suggestions or solutions as corrective measures. The Credit Policy Committee is responsible for the supervision and approval of policies, procedures, and credit risk parameters.

7. Risk Management/Integrated is an independent work unit of the risk taking unit and internal control unit that is responsible to the Director in charge of risk management.

More detailed information regarding the Risk Monitoring Committee, Risk Management Committee, Credit Committee, and Credit Policy Committee is presented in the Corporate Governance chapter of this Annual Report.

All management and employees of Bank Victoria have roles and responsibilities in the implementation, compliance, and improvement of the internal control system at the Bank. This is reflected in the Three Lines of Defenses concept, which has been implemented across all lines of the organization to ensure an effective and comprehensive risk management.

In its application, the structure and division of tasks and responsibilities in risk management process are divided into 3 (three) which include:

1. Line 1: has members and manages day-to-day risks inherent in business and/or its activities, including risk taking. This includes identifying, assessing, controlling, mitigating, monitoring, and reporting risk exposures, as well as ensuring that such

eksposur risikonya dan memastikan bahwa hal tersebut dalam batasan yang telah ditetapkan dalam strategi risiko, *risk tolerance*, *risk appetite*, serta kerangka kerja, kebijakan dan prosedur manajemen risiko. Merancang dan melaksanakan aktivitas dan kontrol dalam *end-to-end process;*

2. Lini 2: fungsi untuk menetapkan dan memiliki kerangka kerja, kebijakan dan prosedur manajemen risiko untuk mengidentifikasi, menilai, mengendalikan, memitigasi, memantau, dan melaporkan risiko tertentu yang menjadi tanggung jawab fungsi tersebut. Menyediakan tata kelola risiko dan pengawasan secara keseluruhan atas kerangka kerja manajemen risiko, termasuk pemantauan dan pelaporan eksposur risiko secara keseluruhan dari Bank. Mengkaji, menganalisis, dan mengevaluasi penilaian risiko serta efektivitas pengelolaan risiko yang dilakukan oleh Lini 1; dan
3. Lini 3: menyediakan *reasonable assurance* melalui penilaian independen, tinjauan dan validasi (kerangka kerja, kebijakan, dan perangkat manajemen risiko cukup kuat dan konsisten dengan standar peraturan yang berlaku, kontrol untuk memitigasi risiko sudah cukup dan efektif dijalankan oleh Lini 1, pengawasan yang memadai oleh Lini 2 terhadap Lini 1).

Bank secara berkala melakukan kaji ulang dan evaluasi terhadap unit kerja guna mengidentifikasi setiap risiko potensial yang dapat berdampak signifikan terhadap operasional Bank. Evaluasi ini bertujuan untuk memastikan bahwa manajemen risiko diterapkan secara efektif dan selaras dengan perkembangan bisnis serta regulasi yang berlaku.

Proses evaluasi pelaksanaan manajemen risiko menggunakan pendekatan berbasis risiko (*risk-based approach)* dan dilakukan oleh *Risk Management* dengan bekerja sama dengan seluruh unit kerja terkait. Hasil evaluasi ini kemudian ditinjau dan dikomunikasikan melalui berbagai rapat berkala, termasuk rapat Komite Manajemen Risiko, guna memastikan bahwa strategi pengelolaan risiko tetap optimal dan dapat mendukung keberlanjutan bisnis Bank.

Stress Test

Stress testing adalah teknik yang digunakan oleh Bank Victoria untuk kerentanan Bank terhadap kejadian di luar aktivitas bisnis normal, namun tetap masuk akal. *Stress test* dirancang untuk menilai dampak dari peristiwa luar biasa dengan kemungkinan kejadian rendah tetapi berisiko tinggi. Tujuan dari *stress test* antara lain:

1. Mengelola portofolio agar tidak terjadi konsentrasi risiko yang terlalu tinggi, yang dapat menyebabkan kerugian besar pada kondisi skenario ekstrem tetapi mungkin terjadi;
2. Memastikan sumber daya keuangan Bank cukup untuk bertahan dalam skenario yang parah tetapi masuk akal;
3. Memiliki fleksibilitas finansial untuk menghadapi skenario ekstrem tetapi mungkin terjadi; dan

matters are within the limits set in risk strategy, risk tolerance, risk appetite, and risk management framework, policies, and procedures. Designs and implements activities and controls in end-to-end processes;

2. Line 2: fungtion for establishes and has risk management framework, policies, and procedures to identify, assess, control, mitigate, monitor, and report on specific risks for which the function is responsible. Provides overall risk governance and supervision of risk management framework, including monitoring and reporting the Bank's overall risk exposure. Reviews, analyzes, and evaluates risk assessments and risk management effectiveness carried out by Line 1; and
3. Line 3: provides reasonable assurance through independent assessment, review, and validation (risk management framework, policies, and tools are quite strong and consistent with applicable regulations' standards, controls to mitigate sufficient and effective risks implemented by Line 1, adequate supervision by Line 2 against Line 1).

The Bank periodically reviews and evaluates the work units to identify any potential risks that could have a significant impact on the Bank's operations. This evaluation aims to ensure that risk management is implemented effectively and in line with business developments and applicable regulations.

The risk management evaluation process uses risk-based approach and is performed by Risk Management, in coordination with all relevant work units. The results of this evaluation are then reviewed and communicated through various periodic meetings, including Risk Management Committee's meetings, to ensure that the risk management strategy remains optimal and can support the Bank's business sustainability.

Stress Test

Stress test is a technique used by Bank Victoria to assess the Bank's vulnerability to events outside of normal business activities, while remaining reasonable. Stress test is designed to assess the impact of extraordinary event with a low probability but high risk event. The purposes of stress tests are among others:

1. Managing the portfolio so that there is no excessive concentration of risk, which can cause large loss in extreme but possible scenarios;
2. Ensuring the Bank's financial resources are sufficient to survive severe but reasonable scenario;
3. Having financial flexibility to face extreme but possible scenario; and

4. Memahami risiko model bisnis utama, mengidentifikasi peristiwa ekstrem yang dapat berdampak pada Bank, serta menentukan tindak lanjut untuk mengurangi kemungkinan dan/atau dampaknya.

Stress test digunakan sebagai alat untuk menilai kemampuan Bank dalam menyerap potensi risiko atas memburuknya kondisi ekonomi, seperti resesi, krisis pasar keuangan, atau peristiwa risiko spesifik yang terjadi di Bank. Analisis dilakukan dengan menggunakan skenario hipotetis atau analisis sensitivitas untuk menentukan apakah Bank memiliki kapasitas yang cukup dalam menghadapi kondisi merugikan Bank. Hasil dari *stress test* ini harus terdokumentasikan dengan jelas.

Jenis *stress test* yang dilakukan Bank Victoria sebagai berikut:
1. Analisa sensitivitas, menilai pengaruh perubahan 1 (satu) faktor risiko atau variabel terhadap portofolio pada waktu tertentu, dengan asumsi faktor risiko lainnya tetap;
2. Analisa skenario, mengubah beberapa faktor risiko berdasarkan skenario yang dibangun atau ditentukan. Skenario dapat berbasis:
   a. Skenario hipotesis, merupakan skenario yang dibangun dengan mensimulasikan kejadian yang mungkin terjadi di masa depan tetapi belum pernah terjadi sebelumnya; dan
   b. Skenario historis, merupakan skenario *stress* yang dibangun dengan merekonstruksikan kejadian krisis yang pernah terjadi di masa lalu dengan pendekatan yang lebih objektif.

Stress test dilakukan dengan berbagai asumsi skenario serta *action plan/remedial action* terkait risiko kredit, pasar, dan likuiditas. Bank Victoria merancang skenario *stress test* dalam berbagai tingkatan berdasarkan intensitas stres berikut:
1. Makro ekonomi, merupakan suatu skenario yang mempertimbangkan faktor-faktor utama makro ekonomi, seperti pertumbuhan produk domestik bruto, nilai tukar, *rating sovereign,* biaya dana, suku bunga *overnight*, inflasi, dan imbal hasil obligasi. Jenis skenario ini paling umum digunakan *stress test*;
2. Sistemik (*market-wide*), merupakan suatu skenario yang mempertimbangkan dampak sistemik dari peristiwa ekonomi, masalah keuangan, atau kejadian katastropis lainnya baik di dalam maupun di luar negeri yang mungkin memengaruhi Bank;
3. *Idiosyncratic*, merupakan suatu skenario yang mempertimbangkan peristiwa khusus yang hanya berdampak pada Bank Victoria, seperti *cyber risk*, kerugian besar dalam *trading*, atau kasus *fraud* yang berskala besar;
4. Gabungan, merupakan suatu skenario yang mencakup kombinasi antara skenario makro ekonomi dan skenario *idiosyncratic*; serta
5. *Reverse stress test*, merupakan suatu skenario yang mengasumsikan tingkat modal dan likuiditas Bank berada di bawah ketentuan minimum regulator, sehingga dapat membantu dalam mengantisipasi kemungkinan terburuk.

4. Understanding the risks of main business model, identifying extreme events that can impact the Bank, and determining follow-up actions to reduce the likelihood and/or impact.

Stress test is used as a tool to assess the Bank's ability to absorb potential risks from worsening economic conditions, such as recession, financial market crises, or specific risk events that occur in the Bank. The analysis is carried out by using hypothetical scenario or sensitivity analysis to determine whether the Bank has sufficient capacity to face adverse conditions for the Bank. The results of this stress test must be clearly documented.

The types of stress test conducted by Bank Victoria are as follows:
1. Sensitivity analysis, assessing the impact of changes in 1 (one) risk factor or variable on the portfolio at a certain time, assuming other risk factors remain constant;
2. Scenario analysis, changing several risk factors based on scenarios that are built or determined. Scenario may be based on:
   a. Hypothetical scenario, is scenario built by simulating events that may occur in the future but have never happened before; and
   b. Historical scenario, is stress scenario built by reconstructing crisis events that have occurred in the past with a more objective approach.

Stress test is conducted with various scenario assumptions and action plans/remedial actions related to credit, market, and liquidity risks. Bank Victoria designs stress test scenarios at various levels based on the following stress intensity:
1. Macroeconomic, is a scenario that considers the main macroeconomic factors, such as gross domestic product growth, exchange rates, sovereign ratings, cost of funds, overnight interest rates, inflation, and bond yields. This type of scenario is the most commonly used stress test;
2. Systemic (market-wide), is a scenario that considers the systemic impact of economic events, financial problems, or other catastrophic events both at home and abroad that may affect the Bank;
3. Idiosyncratic, is a scenario that considers specific events that only impact Bank Victoria, such as cyber risk, major trading losses, or large-scale fraud cases;
4. Combined, is a scenario that includes a combination of macroeconomic scenario and idiosyncratic scenario; and
5. Reverse stress test, is a scenario that assumes the Bank's capital and liquidity levels are below the minimum regulatory requirements, so that it can help anticipate the worst possibilities.

Risk Management/Integrated

Risk Management/Integrated merupakan satuan kerja independen terhadap satuan kerja operasional dan satuan kerja yang melaksanakan fungsi pengendalian internal. *Risk Management/Integrated* dipimpin oleh seorang Kepala Divisi dan bertanggung jawab langsung kepada Direktur Kepatuhan dan Manajemen Risiko. *Risk Management/Integrated* bekerja sama dengan seluruh unit bisnis dan unit pendukung untuk membangun secara komprehensif dalam melakukan proses identifikasi, pengukuran, pemantauan, pengendalian risiko dan sistem informasi, *Risk Management/Integrated* menjadi mitra strategis dari unit-unit bisnis guna mengoptimalkan pendapatan dan meminimalisir potensi kerugian dari aktivitas fungsional operasional Bank.

Pedoman *Risk Management/Integrated*

Pelaksanaan tugas *Risk Management/Integrated* berpedoman pada Kebijakan dan Pedoman Umum Manajemen Risiko (Kebijakan Utama Kerangka Kerja Manajemen Risiko) yang disahkan tanggal 31 Januari 2024.

Tugas dan Tanggung Jawab *Risk Management/Integrated*

Risk Management/Integrated memiliki tugas dan tanggung jawab sebagai berikut:

1. Memantau pelaksanaan strategi manajemen risiko yang telah disetujui oleh Direksi;
2. Mengawasi dan menguji aktivitas pengambilan risiko dan rencana remediasi risiko yang dibuat oleh Lini 1, termasuk penyelenggaraan produk baru bank serta membuat rekomendasi atau keputusan untuk menyetujui atau menolak aktivitas/produk sesuai kebutuhan;
3. Mengkaji ulang secara berkala terhadap proses manajemen risiko;
4. Memastikan dan memantau posisi risiko secara keseluruhan (*composite*), per jenis risiko, dan per jenis aktivitas fungsional sejalan dengan *risk appetite* dan *risk tolerance*, serta melakukan *stress testing;*
5. Memberikan rekomendasi kepada satuan kerja operasional (*risk taking unit*) dan/atau kepada Komite Manajemen Risiko sesuai kewenangan yang dimiliki, antara lain memuat rekomendasi yang terkait dengan besaran atau maksimum eksposur risiko yang wajib dipelihara oleh Bank;
6. Menyusun dan menyampaikan laporan profil risiko kepada Direktur Utama atau Direktur yang ditugaskan secara khusus, juga kepada Komite Manajemen Risiko secara berkala; dan
7. Melakukan evaluasi terhadap keakuratan model dan validitas data yang digunakan dalam mengukur risiko untuk keperluan internal.

Risk Management/Integrated

The Risk Management/Integrated is an independent work unit against operational work units and a work unit performing internal control functions. The Risk Management/Integrated is led by a Division Head who is directly responsible to the Director of Compliance and Risk Management. The Risk Management/Integrated partners with all business units and supporting units to build a comprehensive process of identification, measurement, monitoring, control of risk and information systems. The Risk Management/Integrated becomes a strategic partner of the business units to optimize revenue and minimize potential losses from the Bank's operational functional activities.

Risk Management/Integrated Guidelines

The Risk Management/Integrated duty implementation is guided by the General Risk Management Policy and Guidelines (Main Risk Management Framework Policy) ratified on 31 January 2024.

Duties and Responsibilities of Risk Management/Integrated

The Risk Management/Integrated has the following duties and responsibilities:

1. Monitoring the implementation of risk management strategy that has been approved by the Board of Directors;
2. Supervising and examining risk taking activities and risk remediation plans created by Line 1, including new bank products, and making recommendations or decisions to approve or reject activities/products as needed;
3. Periodically reviewing the risk management process;
4. Ensuring and monitoring the overall risk position (composite), per type of risk, and per type of functional activity in line with risk appetite and risk tolerance, and performing stress testing;
5. Providing recommendation to the operational work unit (risk taking unit) and/or to the Risk Management Committee, in accordance with its authority, among others, recommendations related to the amount or maximum risk exposure that must be maintained by the Bank;
6. Preparing and delivering the risk profile report to the President Director or Director specifically in charge of, and also the Risk Management Committee periodically; and
7. Evaluating the model accuracy and data validity used in measuring risk for internal purposes.

Profil Kepala Divisi *Risk Management/Integrated*
Profile of Head of Risk Management/Integrated Division

SAM R. SOELAEMAN

Kepala Divisi *Risk Management/Integrated*
Head of Risk Management/Integrated Division

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Cianjur

Usia / Age
59 tahun / years old

Domisili / Domicile
Bogor

Dasar Pengangkatan dan Periode Menjabat
Keputusan Direksi No. 001/SK-DIR/HCM/08/23 tanggal 1 Agustus 2023.

Riwayat Pendidikan
Magister Manajemen dari Universitas Pancasila Jakarta (2003).

Rangkap Jabatan
Di dalam Bank Victoria:
Tidak ada.

Di luar Bank Victoria:
Tidak ada.

Riwayat Jabatan
Memiliki pengalaman kerja dalam industri perbankan sejak tahun 1990 dan memegang beberapa posisi penting di antaranya:
- *Forex Trader* PT ASEAM Indonesia (1990-1992);
- *Treasury* PT Bank Rama (1992-2001);
- Pemeriksa *Specialist Treasury* dan Manajemen Risiko Bank Indonesia (2001-2004); dan
- *Head of Market, Liquidity, & Treasury Credit Risk Management* PT Bank Maybank Indonesia Tbk (2005-2022).

Sertifikasi
- *International Certificate in Banking Risk and Regulation* (ICBRR) dari Global Association of Risk Professional - Badan Sertifikasi Manajemen Risiko (GARP-BSMR) (2009); dan
- Sertifikasi Manajemen Risiko Jenjang 6 dari Lembaga Sertifikasi Profesi Perbankan (2023-2026).

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

Basis of Appointment and Term of Office
Board of Directors' Decision No. 001/SK-DIR/HCM/08/23 dated 1 August 2023.

Education
Master of Management from Universitas Pancasila Jakarta (2003).

Concurrent Positions
In Bank Victoria:
None.

Outside of Bank Victoria:
None.

History of Positions
Has work experience in banking industry since 1990 and has held several important positions including:
- Forex Trader at PT ASEAM Indonesia (1990-1992);
- Treasury at PT Bank Rama (1992-2001);
- Treasury and Risk Management Specialist Examiner at Bank Indonesia (2001-2004); and
- Head of Market, Liquidity, & Treasury Credit Risk Management at PT Bank Maybank Indonesia Tbk (2005-2022).

Certification
- International Certificate in Banking Risk and Regulation (ICBRR) from the Global Association of Risk Professional – Risk Management Certification Agency (GARPBSMR) (2009); and
- Risk Management Certification Level 6 from Banking Professional Certification Institute (2023-2026).

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

Laporan Singkat Pelaksanaan Kegiatan Tugas *Risk Management/Integrated* Tahun 2024
Sepanjang tahun 2024, *Risk Management/Integrated* telah melaksanakan kegiatan sebagai bentuk pelaksanaan tugas dan tanggung jawabnya yang diuraikan sebagai berikut:
1. Melakukan evaluasi terhadap parameter profil risiko, *Risk and Control Self-Assessment* (RCSA), serta *key risk indicator* bersama dengan *risk taking unit*;
2. Memantau eskposur risiko serta kepatuhan terhadap toleransi risiko dan limit yang telah ditetapkan, baik melalui laporan maupun Komite Manajemen Risiko, serta melakukan *stress testing*;

Brief Report on the Implementation of Risk Management/Integrated Duties in 2024
Throughout 2024, the Risk Management/Integrated carried out activities as the implementation of its duties and responsibilities as described below:
1. Conducting evaluations on risk profile parameters, Risk and Control Self-Assessment (RCSA), and key risk indicators together with the risk taking unit;
2. Monitoring risk exposure and compliance with the established risk tolerances and limits, either through reports and Risk Management Committee, or conducting stress testing;

3. Melakukan kajian terhadap usulan penyelenggaraan produk baru Bank;
4. Membuat beberapa kebijakan baru terkait risiko kredit, risiko pasar, risiko operasional, dan risiko likuiditas;
5. Mengembangkan sistem pengelolaan risiko pasar dan risiko likuiditas guna meningkatkan efektivitas manajemen risiko;
6. Menyusun rencana aksi pemulihan (*recovery plan*) Bank untuk mengantisipasi potensi gangguan terhadap stabilitas keuangan Bank;
7. Melakukan kajian terhadap kebijakan dan prosedur Bank guna memastikan efektivitas dan kepatuhan terhadap regulasi yang berlaku; dan
8. Menyusun dan menyampaikan laporan terkait manajemen risiko sesuai dengan ketentuan yang berlaku, baik kepada pihak internal maupun regulator secara berkala.

Pelatihan dan/atau Peningkatan *Risk Management/Integrated*

Sepanjang tahun 2024, *Risk Management/Integrated* telah mengikuti pelatihan dan/atau program peningkatan kompetensi, baik yang diselenggarakan secara internal maupun eksternal, sebanyak 34 (tiga puluh empat) kali, dengan materi di antaranya sebagai berikut:

1. *Corporate Culture and Service* (Bank Victoria);
2. *Anti-Fraud* (Bank Victoria);
3. Perlindungan Konsumen dan Perlindungan Data Pribadi (Bank Victoria);
4. Pembekalan Sertifikasi Manajemen Risiko (Bank Victoria);
5. *Climate Risk Management and Scenario Analysis* (Eksternal); dan
6. Pelatihan terkait manajemen risiko seperti risiko likuiditas, risiko pasar, risiko operasional, risiko kredit, dan risiko siber.

Sertifikasi Manajemen Risiko

Bank Victoria telah melibatkan jajaran manajemen dalam program sertifikasi manajemen risiko guna meningkatkan kompetensi dalam mengelola risiko perbankan yang semakin kompleks. Selain itu, Bank secara rutin menyelenggarakan pelatihan penyegaran bagi manajemen yang telah lulus program sertifikasi, memastikan pemahaman yang selalu diperbarui terhadap praktik manajemen risiko. Informasi terkait sertifikasi manajemen risiko yang dimiliki jajaran manajemen di tahun 2024 sebagai berikut:

3. Reviewing the proposed new products of the Bank;
4. Creating several new policies related to credit risk, market risk, operational risk, and liquidity risk;
5. Developing market risk and liquidity risk management system to improve the effectiveness of risk management;
6. Preparing the Bank's recovery plan to anticipate potential disruptions to the Bank's financial stability;
7. Reviewing the Bank's policies and procedures to ensure effectiveness and compliance with the applicable regulations; and
8. Preparing and submitting reports related to risk management in accordance with the applicable provisions, both to internal parties and regulators, on a regular basis.

Risk Management/Integrated Training and/or Development Programs

Throughout 2024, the Risk Management/Integrated attended 34 (thirty-four) trainings and/or competency improvement programs, both organized internally and externally, with materials covering including the following matters:

1. Corporate Culture and Service (Bank Victoria);
2. Anti-Fraud (Bank Victoria);
3. Consumer Protection and Personal Data Protection (Bank Victoria);
4. Briefing of Risk Management Certification (Bank Victoria);
5. Climate Risk Management and Scenario Analysis (External); and
6. Training related to risk management such as liquidity risk, market risk, operational risk, credit risk, and cyber risk.

Risk Management Certification

Bank Victoria involved the management in a risk management certification program to improve their competence in managing the increasingly complex banking risks. In addition, the Bank regularly holds refreshment training for the management who have passed the certification program, ensuring their updated understanding of risk management practices. The information related to risk management certification held by the management in 2024 is as follows:

Level	Dewan Komisaris Board of Commissioners	Direksi Board of Directors	Pejabat Eksekutif Executive Officers	Lain-Lain Others	Total
IV	-	-	-	145	**145**
V	-	-	24	101	**125**
VI	-	-	7	4	**11**
VII	3	5	2	-	**10**
Total	**3**	**5**	**33**	**250**	**291**

Pengungkapan Eksposur Risiko
Disclosure of Risk Exposure

Pengungkapan eksposur risiko Bank Victoria mencakup informasi terkait berbagai jenis risiko yang dihadapi dalam kegiatan operasional. Bank secara transparan melaporkan eksposur ini untuk memastikan pemahaman yang jelas bagi pemangku kepentingan. Langkah ini dilakukan untuk memitigasi dampak risiko dan menjaga stabilitas usaha.

The risk exposure disclosure of Bank Victoria includes information related to various types of risks faced in operational activities. The Bank transparently reports this exposure to ensure a clear understanding for stakeholders. This step is taken to mitigate the impact of risk and maintain business stability.

Risiko Kredit

Risiko kredit merupakan risiko kegagalan pihak lain dalam memenuhi kewajiban kepada Bank, termasuk risiko kredit akibat kegagalan debitur, risiko konsentrasi kredit, *counterparty credit risk, settlement risk,* dan *country risk.*

Tujuan dari manajemen risiko kredit adalah untuk memastikan aktivitas penyediaan dana Bank tidak terekspos pada risiko kredit yang dapat menimbulkan kerugian pada Bank.

Pengungkapan Eksposur Manajemen Risiko Kredit

1. Risiko Kredit secara Umum (CRA)

a. Model Bisnis Tercermin dalam Komponen Profil Risiko Kredit Bank

Penerapan manajemen risiko Bank untuk risiko kredit secara prinsip mengacu pada peraturan regulator dan ketentuan yang berlaku serta *market practices* yang disesuaikan dengan tujuan, kebijakan, ukuran, dan kompleksitas bisnis Bank untuk mencapai pertumbuhan bisnis yang sehat dan berkelanjutan serta menjaga agar dapat menghasilkan *return* yang optimal sesuai dengan *risk appetite* dan *risk tolerance* yang telah ditetapkan.

Dalam menjalankan strategi Bank sejalan dengan visi dan misi sebagai acuan dalam mengambil keputusan serta menjalankan kegiatan operasional Bank, strategi manajemen risiko kredit yang dilakukan oleh Bank untuk menjaga risiko kredit, di antaranya sebagai berikut:

1) Bank menjaga tingkat risiko kredit dengan mitigasi yang memadai untuk mencapai tujuan strategis; dan
2) Pertumbuhan/peningkatan portofolio kredit dengan memperhatikan kecukupan modal dalam kondisi normal dan skenario *stress.*

Strategi manajemen risiko disusun untuk memastikan bahwa eksposur risiko dikelola secara terkendali sesuai dengan kebijakan kredit, prosedur internal, peraturan dan perundang-undangan, serta ketentuan lain yang berlaku.

Credit Risk

Credit risk is the risk of failure of other parties in fulfilling obligations to the Bank, including credit risk due to debtor failure, credit concentration risk, counterparty credit risk, settlement risk, and country risk.

The credit risk management is aimed to ensure that the Bank's fund provision activities are not exposed to credit risk which could cause losses to the Bank.

Disclosure of Credit Risk Management Exposure

1. General Credit Risk (CRA)

a. Business Model is Reflected in the Bank's Credit Risk Profile Component

The Bank's risk management implementation for credit risk in principle refers to the applicable regulatory regulations and provisions, as well as market practices adapted to the objectives, policies, size, and complexity of the Bank's business, in order to achieve healthy and sustainable business growth and ensure that it can produce optimal returns in accordance with the established risk appetite and risk tolerance.

In carrying out the Bank's strategy in line with vision and mission as a reference in making decisions and carrying out the Bank's operational activities, the credit risk management strategy carried out by the Bank to maintain credit risk, includes the following:

1) The Bank maintains credit risk levels with adequate mitigation to achieve strategic objectives; and
2) Growth/increase in credit portfolio with due observance of the capital adequacy in normal conditions and stress scenarios.

Risk management strategy is prepared to ensure that risk exposure is managed in a controlled manner in accordance with credit policies, internal procedures, rules and regulations, and other applicable provisions.

b. Kebijakan Manajemen Risiko untuk Risiko Kredit dan Limit Risiko Kredit

Kebijakan manajemen risiko untuk risiko kredit merupakan arahan tertulis dalam menerapkan manajemen risiko untuk risiko kredit dengan memperhatikan karakteristik dan kompleksitas kegiatan usaha, tingkat risiko yang akan diambil dan toleransi risiko, profil risiko serta peraturan yang ditetapkan otoritas dan/atau praktik perbankan yang sehat, seperti di antaranya pengendalian risiko konsentrasi kredit dan/atau dengan melakukan diversifikasi portofolio kredit dan penyebaran risiko yang timbul dari berbagai sektor industri atau sektor ekonomi. Terkait hal ini, Bank di antaranya melakukan:

1) Penetapan limit berdasarkan sektor ekonomi atas analisa makro ekonomi dan karakteristik Bank;
2) Analisa risiko konsentrasi kredit dilakukan sesuai portofolio yang dikelola Bank dengan mempertimbangkan berbagai dampak perubahan dari indikator ekonomi yang dapat memengaruhi pemberian kredit pada sektor ekonomi tertentu; dan
3) Analisa pergerakan kualitas kredit seperti *non-performing loan.*

Penetapan limit dilakukan secara komprehensif atas seluruh aspek yang terkait dengan risiko, yang mencakup limit per aktivitas bisnis Bank. Limit digunakan sebagai ambang batas untuk menentukan tingkat intensitas mitigasi risiko yang akan dilaksanakan manajemen.

c. Struktur Organisasi Manajemen Risiko Kredit

Penerapan manajemen risiko kredit di Bank Victoria dilakukan melalui desain struktur organisasi yang menggambarkan keterlibatan seluruh pihak yang terkait manajemen risiko kredit sebagai berikut:

1) Dewan Komisaris berperan dalam menyetujui rencana kredit tahunan Bank dan mengawasi pelaksanaannya, menyetujui kebijakan perkreditan Bank, meminta penjelasan dan tanggung jawab kepada Direksi jika dalam pelaksanaan pemberian kredit terdapat penyimpangan dari kebijakan yang telah ditetapkan;
2) Direksi berperan dalam menyusun rencana dan kebijakan perkreditan, memastikan kepatuhan Bank terhadap ketentuan perundang-undangan dan peraturan yang berlaku di bidang perkreditan dan kebijakan perkreditan, serta melaporkan kepada Dewan Komisaris mengenai pelaksanaan rencana perkreditan, penyimpangan dalam pelaksanaan pemberian kredit, perkembangan kualitas portofolio kredit dan kredit dalam pengawasan khusus atau bermasalah;
3) Lini Pertahanan Pertama, terdiri dari Divisi Bisnis, Divisi *Credit Risk Review,* Divisi *Loan & Trade Operations,* dan Divisi *Special Asset Management.* Lini Pertahanan Kedua terdiri dari *Credit Monitoring* dan *Collection* dan Divisi *Corporate Legal;*

b. Risk Management Policy for Credit Risk and Credit Risk Limit

Risk management policy for credit risk is written direction in implementing risk management for credit risk by considering business activities' characteristics and complexity, level of risk to be taken and risk tolerance, risk profile and regulations set by authorities and/or sound banking practices, as in including controlling credit concentration risk and/or by diversifying credit portfolio and spreading risks arising from various industrial sectors or economic sector. Regarding this matter, the Bank conducts:

1) Establishment of limit based on the economic sector of the macroeconomic analysis and the Bank's characteristics;
2) Credit concentration risk analysis is conducted according to the portfolio managed by the Bank by considering various impacts of changes in economic indicators that can affect lending on certain economic sector; and
3) Analysis of credit quality movements, such as non-performing loans.

Limit is established comprehensively for all aspects related to risk, which includes limits per Bank business activity. Limits are used as thresholds to determine the level of risk mitigation intensity to be implemented by the management.

c. Organizational Structure of Credit Risk Management

The implementation of credit risk management at Bank Victoria is carried out through the design of an organizational structure that describes the involvement of all parties related to credit risk management as follows:

1) The Board of Commissioners plays a role in approving the Bank's annual credit plan and supervising its implementation, approving the Bank's credit policy, asking for explanation and accountability from the Board of Directors if there is a deviation from the stipulated policy in the provision of credit;
2) The Board of Directors plays a role in preparing credit plans and policies, ensuring the Bank's compliance with the laws and regulations applicable in credit sector and credit policies, and reporting to the Board of Commissioners on credit plan implementation, irregularities in the implementation of credit extension, development of credit and credit portfolio quality under special mention or non-performing;
3) The First Line of Defense, consists of the Business Division, Credit Risk Review Division, Loan & Trade Operations Division, and Special Asset Management Division. The Second Line of Defense consists of the Credit Monitoring and Collection and Corporate Legal Division;

4) Lini Pertahanan Kedua, terdiri dari *Credit Legal Unit;* Divisi *Compliance, System Procedure & Customer Protection*; dan Divisi *Risk Management/Integrated*; dan
5) Lini Pertahanan Ketiga adalah Divisi SKAI.

Selain itu, Bank juga dibantu oleh komite-komite eksekutif seperti:
1) Komite Kredit;
2) Komite Kebijakan Perkreditan; dan
3) Komite Manajemen Risiko.

d. Hubungan antara Fungsi Manajemen Risiko untuk Risiko Kredit, Pengendalian Risiko, Kepatuhan, dan Audit Internal
Penerapan manajemen risiko bermanfaat untuk melakukan analisis kemungkinan adanya risiko yang akan dihadapi saat ini maupun yang akan datang dengan tujuan agar Bank mampu mengidentifikasi setiap risiko yang berpotensi muncul dan berdampak signifikan.

Secara internal, efektivitas penerapan manajemen risiko kredit juga didukung oleh unit independen lainnya seperti *Compliance* dan SKAI. Dalam hal ini, *Compliance* melakukan fungsinya untuk memastikan kebijakan dan penerapan manajemen risiko telah sesuai ketentuan yang berlaku. Sementara itu, SKAI secara rutin melakukan peninjauan ulang dan audit terhadap penerapan manajemen risiko Bank berdasarkan *risk-based audit* dengan tujuan sebagai pengendalian internal serta perbaikan penerapan manajemen risiko secara terus menerus. Adapun evaluasi efektivitas sistem manajemen risiko secara eksternal dilakukan oleh auditor eksternal maupun regulator. Evaluasi penerapan manajemen risiko ditinjau dan dikomunikasikan melalui rapat-rapat secara berkala, seperti melalui rapat Komite Manajemen Risiko.

e. Cakupan dan Informasi Utama dari Pelaporan Eksposur Risiko Kredit dan Fungsi Manajemen Risiko untuk Risiko Kredit kepada Direksi dan Dewan Komisaris
Pengungkapan eksposur risiko kredit dengan pendekatan standar risiko kredit berpedoman pada Peraturan Otoritas Jasa Keuangan No. 27 Tahun 2022 tentang Perubahan Kedua atas Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum bagi Bank Umum dan Surat Edaran Otoritas Jasa Keuangan No. 48/SEOJK.03/2017 tentang Pedoman Perhitungan Tagihan Bersih Transaksi Derivatif dalam Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Kredit dengan Menggunakan Pendekatan Standar, dan Surat Edaran Otoritas Jasa Keuangan No. 24/SEOJK.03/2021 Pedoman Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Kredit dengan Menggunakan Pendekatan Standar bagi Bank Umum.

4) The Second Line of Defense, consisting of Credit Legal Unit; Compliance, System Procedure & Customer Protection Division; and Risk Management/Integrated Division; and
5) The Third Line of Defense is the SKAI Division.

Furthermore, the Bank is also assisted by executive committees such as:
1) Credit Committee;
2) Credit Policy Committee; and
3) Risk Management Committee.

d. Relationship between Risk Management Function for Credit Risk, Risk Control, Compliance, and Internal Audit
Risk management is useful to analyze the possible risks that may be faced in the present or future, with the aim of enabling the Bank to identify any potential risks that may arise and have a significant impact.

Internally, the effectiveness of credit risk management implementation is also supported by other independent units, such as the Compliance and SKAI. In this matter, the Compliance performs its function to ensure that risk management policies and implementation are in accordance with the applicable regulations. Whereas, the SKAI regularly reviews and audits the Bank's risk management implementation on a risk-based audit principle with the objective as internal control and continuous improvement of risk management implementation. The risk management system effectiveness is externally evaluated by external auditors and regulators. Evaluation of risk management implementation is reviewed and communicated through regular meetings, such as through the Risk Management Committee's meetings.

e. Scope and Key Information from the Reporting of Credit Risk Exposure and Risk Management Function for Credit Risk to the Board of Directors and Board of Commissioners
Disclosure of credit risk exposure with a standardized approach of credit risk refers to the Financial Services Authority Regulation No. 27 of 2022 on Second Amendment to Financial Services Authority Regulation No. 11/POJK.03/2016 on Capital Adequacy Ratio for Commercial Banks and Financial Services Authority Circular No. 48/SEOJK.03/2017 on Guidelines for Calculating Net Receivables for Derivative Transactions in Calculating Risk-Weighted Assets for Credit Risk by Using a Standardized Approach, and Financial Services Authority Circular No. 24/SEOJK.03/2021 on Guidelines for Calculating Risk-Weighted Assets for Credit Risk by Using Standardized Approach for Commercial Banks.

Terkait pengungkapan, Bank senantiasa menerapkan kebijakan dan mengedepankan prinsip kehati-hatian dalam mitigasi risiko kredit. Dalam hal ini, Bank telah memuat informasi berikut dalam Lampiran Pengungkapan Kuantitatif Eksposur Risiko untuk CRA:

1) Tabel Pengungkapan Kualitas Kredit Atas Aset (CR1);
2) Tabel Pengungkapan Mutasi Kredit dan Surat Berharga yang telah Jatuh Tempo (CR2);
3) Tabel Pengungkapan Kuantitatif Terkait Teknik MRK (CR3);
4) Tabel Pengungkapan Eksposur Risiko Kredit dan Dampak Teknik MRK (CR4); dan
5) Tabel Pengungkapan Eksposur Berdasarkan Kelas Aset dan Bobot Risiko (CR5).

2. Pengungkapan Tambahan Terkait Kualitas Kredit atas Aset (CRB)

a. Tagihan yang Jatuh Tempo dan Tagihan yang Mengalami Penurunan Nilai/*Impairment*

Bank menerapkan kebijakan tentang tagihan yang jatuh tempo dan tagihan yang mengalami penurunan nilai atau *impairment*, yang meliputi:

1) Tagihan yang telah jatuh tempo, merupakan tagihan yang telah jatuh tempo lebih dari 90 hari, baik atas pembayaran pokok dan/atau pembayaran bunga; dan
2) Tagihan yang mengalami penurunan nilai, yaitu suatu kondisi, di mana terdapat bukti objektif terjadinya peristiwa yang merugikan sebagai akibat dari satu atau lebih peristiwa yang terjadi setelah pengakuan awal kredit tersebut, dan peristiwa yang merugikan tersebut berdampak pada estimasi arus kas masa datang atas aset keuangan atau kelompok aset keuangan yang dapat diestimasi secara andal.

b. Pendekatan yang Digunakan dalam Pembentukan Cadangan Kerugian Penurunan Nilai

Dalam mengestimasi Cadangan Kerugian Penurunan Nilai (CKPN) atas aset keuangan, Bank telah menerapkan Pernyataan Standar Akuntansi Keuangan (PSAK) 71 tentang "Instrumen Keuangan" sejak tanggal 1 Januari 2020. Dalam PSAK 71 ini memperkenalkan metode kerugian kredit ekspektasian dalam mengukur kerugian instrumen keuangan akibat penurunan nilai instrumen keuangan yang merupakan konvergensi *International Financial Accounting Standard* 9 – *Financial Instrument* di Indonesia, di mana dalam PSAK 71 menggunakan prinsip *Forward-Looking Expected Credit Loss* (ECL).

Permodelan parameter yang digunakan Bank seperti *probability of default, loss given default*, dan *exposure at default* komponen perhitungan kerugian kredit ekspektasian.

Dalam menghitung kerugian kredit ekspektasian, Bank memperhitungkan pengaruh dari beberapa *macroeconomic forecast* dalam permodelan *impairment* di PSAK 71.

Regarding disclosure, the Bank always implements policies and prioritizes the prudential principles in mitigating credit risk. Regarding this matter, the Bank has included the following information in the Appendix on Quantitative Disclosure of Risk Exposure for CRA:

1) Table of Disclosure of Credit Quality over Asset (CR1);
2) Table of Disclosure of Changes in Matured Loans and Securities (CR2);
3) Table of Disclosure of Quantitative Related to MRK Techniques (CR3);
4) Table of Disclosure of Credit Risk Exposure and Impact of MRK Techniques (CR4); and
5) Table of Disclosure of Exposure by Asset Class and Risk Weight (CR5).

2. Additional Disclosures Regarding Credit Quality Over Asset (CRB)

a. Matured Receivables and Impaired Receivables

The Bank implements policies regarding due receivables and impaired receivables, which include:

1) Matured receivable is a bill that has been overdue more than 90 days, either on the payments of principal and/or interest; and
2) Impaired receivable is a condition in which there is objective evidence of an adverse event occurring as a result of one or more events occurring after the initial recognition of such credit, and such adverse event has an impact on the estimated future cash flow of a financial asset or group of financial assets that can be estimated reliably.

b. Approach Used in the Formation of Allowance for Impairment Losses

In estimating Allowance for Impairment Losses (CPKN) on financial assets, the Bank has implemented Statement of Financial Accounting Standard (PSAK) 71 on "Financial Instrument" since 1 January 2020. PSAK 71 introduces a method for the expected credit losses in measuring financial instrument losses due to impairment of financial instruments, which is the convergence of International Financial Accounting Standard 9 – Financial Instruments in Indonesia, and in PSAK 71, the principle of Forward-Looking Expected Credit Loss (ECL) is used.

The modeling parameters used by the Bank, such as probability of default, loss given default, and exposure at default, are components for calculating expected credit losses.

In calculating the expected credit losses, the Bank calculates the effects of several macroeconomic forecasts in the impairment modeling in PSAK 71.

CKPN dalam PSAK 71 memiliki 3 (tiga) *stages* berdasarkan tingkat risiko dari rendah hingga tinggi yang diklasifikasi sebagai berikut:

1) *Stage 1* (*Performing*)
   Tidak ada peningkatan risiko kredit dan aset keuangan. Contohnya, pinjaman yang tidak pernah terlambat dalam pembayaran. *Expected Credit Loss* (ECL) diperkirakan dalam waktu 12 (dua belas) bulan.
2) *Stage* 2 (*Under-Performing*)
   Risiko kredit dan aset keuangan meningkat signifikan. Contohnya, pinjaman yang telah terlambat dalam pembayaran lebih dari 30 (tiga puluh) hari, tapi belum masuk dalam kriteria *Stage* 3. *Expected Credit Loss* (ECL) diperkirakan hingga waktu jatuh tempo akhir (*lifetime*).
3) *Stage* 3 (*Non-Performing*)
   Kredit dan aset keuangan yang mengalami penurunan nilai dengan tajam disertai riwayat keterlambatan pembayaran. *Expected Credit Loss* (ECL) diakui hingga waktu jatuh tempo akhir (*lifetime).*

Dalam hal ini, Bank telah memuat informasi berikut dalam Lampiran Pengungkapan Kuantitatif Eksposur Risiko untuk CRB:

1) Tabel Pengungkapan Tagihan Bersih Berdasarkan Wilayah Bank secara Individual;
2) Tabel Pengungkapan Tagihan Bersih Berdasarkan Sektor Ekonomi Bank secara Individual;
3) Tabel Pengungkapan Tagihan Bersih Berdasarkan Sisa Jangka Waktu Kontrak secara Individual;
4) Tabel Pengungkapan Tagihan dan Pencadangan Berdasarkan Wilayah Bank secara Individual;
5) Tabel Pengungkapan Tagihan dan Pencadangan Berdasarkan Sektor Ekonomi Bank secara Individual; dan
6) Tabel Pengungkapan Tagihan Berdasarkan Hari Tunggakan.

3. Pengungkapan Tambahan Terkait Perlakuan Terhadap Aset Bermasalah (CRB-A)

a. Aset *Non-Performing*

Aset *non-performing* merupakan aset dengan kualitas kurang lancar, diragukan, dan macet yang umumnya terjadi pada kegiatan perkreditan. Penyelesaian aset bermasalah bagi debitur dilakukan sesuai dengan pola pengelolaan dan penyelesaian sesuai ketentuan yang berlaku. Aset yang telah dikategorikan bermasalah ditangani melalui pembinaan, penyelamatan, serta penyelesaian secara sukarela. Pelaporan aset bermasalah dilakukan oleh divisi *Special Asset Management.*

Dalam usahanya, Bank melakukan penanganan aset bermasalah secara persuasif serta menghindari risiko reputasi Bank, maka sebelum melakukan tindakan-tindakan lebih lanjut dilakukan pemanggilan atas debitur terlebih dahulu dengan menggunakan surat peringatan maksimal 3 (tiga) kali.

CKPN in PSAK 71 has 3 (three) stages based on level of risk from low to high which are classified as follows:

1) Stage 1 (Performing)
   There is no increase in credit risk and financial assets. For example, a loan that is never late in payment. Expected Credit Loss (ECL) is estimated within 12 (twelve) months.
2) Stage 2 (Under-Performing)
   Credit risk and financial assets have increased significantly. For example, a loan that is overdue by more than 30 (thirty) days, but has not met the Stage 3 criteria. Expected Credit Loss (ECL) is estimated up to the final maturity time (lifetime).
3) Stage 3 (Non-Performing)
   Loans and financial assets that have experienced a sharp impairment accompanied by a history of late payments. Expected Credit Loss (ECL) is recognized up to the final maturity time (lifetime).

Regarding this matter, the Bank has included the following information in the Appendix on Quantitative Disclosure of Risk Exposure for CRB:

1) Table of Disclosure of Net Receivables by Area of the Bank, Individually;
2) Table of Disclosure of Net Receivables by Economic Sector of the Bank, Individually;
3) Table of Disclosure of Net Receivables by Remaining Contract Period of the Bank, Individually;
4) Table of Disclosure of Receivables and Allowances by Area of the Bank, Individually;
5) Table of Disclosure of Receivables and Allowances by Economic Sector of the Bank, Individually; and
6) Table of Disclosure of Receivables by Days Past Due.

3. Additional Disclosures Regarding Treatment of Non-Performing Assets (CRB-A)

a. Non-Performing Assets

Non-performing assets are assets of substandard, doubtful, and loss, which generally occur in credit activities. Settlement of non-performing assets for debtors is carried out in accordance with management and settlement patterns with due observance of the applicable regulations. Assets categorized as non-performing are handled through couching, rescue, and voluntary settlement. Reporting of non-performing assets is carried out by the Special Asset Management division.

In its business, the Bank handles non-performing assets persuasively and avoids risks to the Bank's reputation, thus, the debtor is first summoned by using a maximum of 3 (three) warning letters prior to taking further actions.

Kategori kredit korporasi pada Bank terbagi atas beberapa segmen, di antaranya sebagai berikut:

1) *Large commercial*, kredit dengan tujuan usaha (produktif) dengan total plafon di atas Rp150.000 juta;
2) *Commercial,* kredit dengan tujuan usaha (produktif) dengan total plafon di atas Rp50.000 juta-Rp150.000 juta;
3) *Small, Medium, Enterprise* (SME), kredit dengan tujuan usaha (produktif) dengan total plafon sampai dengan Rp50.000 juta;
4) *Business Linkage*, kredit yang ditujukan pada perusahaan *multifinance* otomotif, baik *executing, channeling*, dan *joint financing,* serta perusahaan *multifinance non-otomotif,* seperti BPR dan koperasi.

Kategori kredit ritel pada Bank, di antaranya adalah segmen *consumer* yang diberikan kepada perorangan dan diajukan secara kelompok.

b. Aset yang Direstrukturisasi

Aset yang direstrukturisasi umumnya dilakukan pada kegiatan perkreditan merupakan upaya yang dilakukan Bank dalam kegiatan perkreditan terhadap debitur yang mengalami kesulitan untuk memenuhi kewajibannya. Restrukturisasi kredit dapat dilakukan Bank terhadap debitur yang masih mempunyai prospek usaha yang baik tetapi mengalami kesulitan pembayaran pokok dan/atau bunga. Kegiatan restrukturisasi dapat berupa:

1) Penjadwalan kembali (*rescheduling*), terkait perubahan jadwal pembayaran dan/atau jangka waktu;
2) Persyaratan kembali (*reconditioning*), terkait perubahan sebagian atau seluruh syarat kredit yang tidak terbatas pada jadwal pembayaran, jangka waktu, dan/atau persyaratan lainnya sepanjang tidak menyangkut perubahan maksimum saldo kredit; dan
3) Penataan kembali (*restructuring*), terkait perubahan syarat kredit yang menyangkut penambahan dana, konversi tunggak bunga menjadi pokok kredit baru, dan konversi kredit menjadi penyertaan dalam perusahaan dengan bentuk reorganisasi, *venture capital, management participation,* dan *management consultation.*

Dalam hal ini, Bank telah memuat informasi berikut dalam Lampiran Pengungkapan Kuantitatif Eksposur Risiko untuk CRB-A:

Tabel Pengungkapan Tambahan Terkait Perlakuan Terhadap Aset Bermasalah (CRB-A).

The corporate credit category at the Bank is divided into several segments, including the following:

1) Large commercial, credit for business (productive) purposes with a total credit above Rp150,000 million;
2) Commercial, credit for business (productive) purposes with a total credit above Rp50,000-Rp150,000 million;
3) Small, Medium, Enterprise (SME), credit for business purposes (productive) with a total credit of up to Rp50,000 million;
4) Business Linkage, credit aimed at automotive multifinance companies, including executing, channeling, and joint financing, as well as non-automotive multi-finance companies, such as BPRs and cooperatives.

Retail credit categories at the Bank include consumer segment given to individuals and submitted as a group.

b. Restructured Assets

Restructuring assets are generally carried out in credit activities, which is the Bank's effort in credit activities for debtors with difficulty on fulfilling their obligations. The Bank can carry out credit restructuring for debtors with good business prospects but are experiencing difficulties in paying principal and/or interest. Restructuring activities can be in the form of:

1) Rescheduling, related to changes in payment schedule and/or time period;
2) Reconditioning, related to changes in part or all of the credit terms not limited to payment schedules, time periods, and/or other terms as long as they do not involve changes to the maximum credit balance; and
3) Restructuring, related to changes in credit terms involving additional funds, conversion of interest arrears into new credit principal, and conversion of credit into investment in the Company in form of reorganization, venture capital, management participation, and management consultation.

Regarding this matter, the Bank has included the following information in the Appendix on Quantitative Disclosure of Risk Exposure for CRB-A:

Table of Additional Disclosures Regarding Treatment of Non-Performing Assets (CRB-A).

4. Pengungkapan Terkait Teknik MRK (CRC)

a. Kebijakan dan Proses Terkait Evaluasi dan Manajemen Agunan

Bank didukung oleh analisa kelayakan debitur dalam pemberian fasilitas kredit. Hal tersebut bertujuan untuk menilai kemampuan debitur dalam mengembalikan seluruh kewajibannya. Sebagai jaminan kredit, Bank menerima agunan yang memenuhi kriteria, seperti mempunyai nilai ekonomis, *marketable*, *transferable*, serta mempunyai nilai yuridis. Dalam praktiknya, diperlukan agunan sebagai *second way out*, dalam hal debitur tidak mampu mengembalikan kewajibannya.

Pengelolaan agunan merupakan perangkat pengendalian risiko yang diterapkan oleh Bank guna melakukan mitigasi risiko kredit untuk meminimalisir dampak dari risiko yang terjadi.

b. Konsentrasi Risiko Kredit atas Instrumen yang digunakan sebagai Teknik MRK

Pihak-pihak utama pemberi jaminan/garansi dan kelayakan kredit (*credit worthiness*) merupakan kemampuan perusahaan untuk memenuhi kewajibannya terhadap Bank. Fokus utamanya terletak pada risiko, meliputi analisis likuiditas maupun solvabilitas. Alat analisis kredit dan kriterianya untuk penilaian seperti di antaranya jenis kredit dan tujuan kontrak utangnya.

Tingkat konsentrasi yang ditimbulkan dari penggunaan teknik mitigasi risiko kredit konsentrasi pada sektor atau portofolio kredit Bank dilakukan dengan pengelolaan risiko konsentrasi kredit melalui penentuan limit untuk sektor industri atau portofolio kredit pada suatu tingkat risiko/*risk appetite* dan *risk tolerance* yang dapat diterima. Hal tersebut bertujuan untuk mendukung pertumbuhan kredit yang sehat dengan mengedepankan pada prinsip-prinsip kehati-hatian.

5. Pengungkapan Penggunaan Peringkat Kredit Eksternal (CRD)

a. Lembaga Pemeringkat yang Digunakan Bank

Bank menggunakan peringkat yang diterbitkan oleh lembaga pemeringkat yang diakui sesuai dengan Peraturan Otoritas Jasa Keuangan seperti diatur dalam Surat Edaran Otoritas Jasa Keuangan No. 37/SEOJK.03/2016 tentang Lembaga Pemeringkat dan Peringkat yang diakui Otoritas Jasa Keuangan, antara lain Moody's, Standard & Poor's, Fitch, Pefindo, Moody's Indonesia, dan Fitch Indonesia.

4. Disclosures Related to MRK Techniques (CRC)

a. Policies and Processes Related to Collateral Evaluation and Management

The Bank is supported by debtor feasibility analysis in granting credit facilities. This matter is aimed at assessing the debtor's ability in returning all of its obligations. As credit collateral, the Bank accepts collateral that meets the criteria, such as having economic value, marketable, transferable, and having juridical value. In practice, collateral is needed as a second way out, in the event that the debtor is unable to repay his obligations.

Collateral management is a risk control tool implemented by the Bank to mitigate credit risk in order to minimize the impact of the arising risks.

b. Concentration of Credit Risk on Instruments used as MRK Techniques

The main parties are the provider of collateral/guarantee and credit worthiness, which is the ability of the Company to fulfill its credit obligations to the Bank. The main focus lies in risk, including liquidity and solvency analysis. The credit analysis tool and its criteria for assessment of among others type and purpose of the debt contract.

The concentration level arising from the use of credit risk mitigation techniques concentration on sector or loan portfolio of the Bank is carried out by managing credit concentration risk through setting limit for industrial sector or loan portfolio of an acceptable level of risk/risk appetite and risk tolerance. This matter aims to support sound credit growth by prioritizing prudential principles.

5. Disclosure of Use of External Credit Ratings (CRD)

a. Rating Agency used by the Bank

The Bank uses ratings issued by rating agencies that are recognized in accordance with Financial Services Authority Regulations as stipulated in the Financial Services Authority Circular No. 37/SEOJK.03/2016 on Rating Agencies and Ratings recognized by the Financial Services Authority, including Moody's, Standard & Poor's, Fitch, Pefindo, Moody's Indonesia, and Fitch Indonesia.

b. Kategori Portofolio yang Menggunakan Peringkat
Bank mengklasifikasikan tagihan berdasarkan kategori portofolio seperti tagihan kepada entitas sektor publik, tagihan kepada Bank, tagihan pada perusahaan efek dan lembaga jasa keuangan lainnya, serta tagihan kepada korporasi. Tagihan pada masing-masing portofolio dikelompokkan berdasarkan peringkat dari lembaga pemeringkat yang diakui regulator. Kelompok peringkat memiliki tingkat risiko yang berbeda.

Pengungkapan *Counterparty Credit Risk*

Bank menerapkan risiko kredit pihak lawan (*Counterparty Credit Risk*). *Counterparty Credit Risk* dapat ditimbulkan dari jenis transaksi derivatif *over the counter* (OTC) dan *repo/reverse repo*, baik pada posisi *banking book* maupun *trading book*. Dalam hal memitigasi *repo/reverse repo* dilakukan dengan penetapan limit *counterparty*, apabila terdapat pelampauan limit, maka perlu mendapatkan persetujuan Direksi melalui Divisi *International Banking*.

Pada posisi 31 Desember 2024, Bank tidak memiliki eksposur transaksi derivatif *Counterparty Credit Risk* (CCR1) dan tagihan bersih derivatif kredit (CCR6). Namun terkait pengungkapan, Bank Victoria memiliki eksposur risiko transaksi *reverse repo* yang diungkapkan pada tabel pengungkapan eksposur CCR berdasarkan Kategori Portofolio dan Bobot Risiko (CCR3).

Pengungkapan Eksposur Sekuritisasi (SECA)

Sebagai upaya diversifikasi risiko dan memaksimalkan hasil, Bank Victoria menempatkan sejumlah portofolio dalam bentuk sekuritisasi atau Kontrak Investasi Kolektif Efek Beragun Aset (KIKEBA). Bank Victoria bertindak sebagai investor dan melakukan investasi pada EBA karena sekuritisasi ini mempunyai likuiditas baik.

Terkait pengungkapan, Bank Victoria memuat informasi Eksposur Sekuritisasi (SECA) pada *Banking Book* (SEC1) dan terkait Persyaratan Modalnya – Bank yang Bertindak sebagai Investor (SEC4), dan tidak memiliki eksposur pada *Trading Book* (SEC2), dan terkait Persyaratan Modalnya – Bank yang Bertindak sebagai Originator atau Sponsor (SEC3).

Risiko Pasar

Kebijakan Manajemen Risiko untuk Risiko Pasar

1. **Strategi dan Proses Manajemen Risiko Pasar**
Risiko pasar adalah risiko pada posisi neraca dan rekening administratif, termasuk transaksi derivatif, akibat perubahan secara keseluruhan dari kondisi pasar, termasuk risiko perubahan harga *option*.

Proses manajemen risiko pasar mencakup semua risiko yang dihadapi Bank akibat pergerakan faktor pasar seperti suku bunga dan nilai tukar, baik dari *banking book* maupun *trading book*. Tujuan utama dari penerapan manajemen risiko pasar adalah meminimalkan dampak negatif akibat perubahan

b. Portfolio Categories by Using Ratings
The Bank classifies receivables by portfolio categories such as receivables from public sector entities, receivables from Banks, receivables from securities companies and other financial services institutions, as well as receivables from corporations. Receivables in each portfolio are grouped by ratings from rating agencies recognized by the regulator. Rating groups have different levels of risk.

Disclosure of Counterparty Credit Risk

The Bank implements Counterparty Credit Risk. Counterparty Credit Risk is a risk arising from over the counter (OTC) derivative transaction and repo/reverse repo transactions, both in the banking book and trading book positions. In terms of repo/reverse repo mitigation with limit establishment for counterparty, approval from the Board of Directors through International Banking Division is required in the event that there is limit exceedance.

At 31 December 2024 position, the Bank has no exposure to Counterparty Credit Risk (CCR1) and net receivables of credit derivative (CCR6). However, regarding disclosure, Bank Victoria has a reverse repo transaction risk exposure which is disclosed in the CCR exposure disclosure table based on Portfolio Category and Risk Weight (CCR3).

Disclosure of Securitization Exposure (SECA)

In an effort to diversify risks and maximize returns, Bank Victoria places a number of portfolios in the form of securitization or Collective Investment Contract of Asset-Backed Securities (KIK EBA). Bank Victoria acts as an investor and invests in EBA due its good liquidity.

Regarding disclosure, Bank Victoria contains information on Securitization Exposure (SECA) in the Banking Book (SEC1) and related to its Capital Requirements – Bank Acting as Investor (SEC4), and has no exposure in the Trading Book (SEC2), and related to its Capital Requirements – Bank Acting as Originator or Sponsor (SEC3).

Market Risk

Risk Management Policy for Market Risk

1. **Market Risk Management Strategy and Process**
Market risk is a risk in balance sheet and administrative account positions including derivative transactions, due to overall changes in market conditions, including the risk of changes in option prices.

The management process of market risk covers all risks faced by the Bank as a result of movements in market factors such as interest rates and exchange rates, both from the banking book and trading book. The main objective of implementing market risk management is to minimize the negative impacts due to

kondisi pasar terhadap aset dan permodalan Bank. Bank menjaga eksposur risiko pasar dalam batas limit internal dan regulasi, dengan tetap memperhatikan kecukupan modal dan pendapatan.

Penerapan manajemen risiko pasar bertujuan untuk meminimalkan dampak negatif dari perubahan kondisi pasar terhadap aset dan permodalan. Ruang lingkup penerapan ini meliputi:

a. Pengawasan aktif oleh Dewan Komisaris dan Direksi;

b. Kecukupan kebijakan, prosedur, dan penetepan limit risiko pasar;
c. Proses identifikasi, pengukuran, pemantauan, dan pengendalian Risiko, serta penerapan sistem informasi manajemen risiko pasar; dan
d. Sistem pengendalian internal yang memadai untuk mengelola risiko pasar secara efektif.

Adapun proses manajemen risiko untuk risiko pasar, sebagai berikut:

a. Identifikasi
   Bank melakukan identifikasi risiko pasar secara berkala, termasuk risiko suku bunga dan nilai tukar.
b. Pengukuran
   Bank menggunakan sistem atau model pengukuran risiko pasar untuk mengukur posisi dan sensitivitas risiko pasar, baik dalam kondisi normal maupun *stress testing*.
c. Pemantauan
   Bank melakukan pemantauan kepatuhan limit risiko secara harian dan mengambil tindak lanjut jika terjadi pelampauan limit. Untuk pemantauan risiko suku bunga pada *banking book*, laporan yang digunakan mencakup perilaku *non-maturity deposit*, informasi *prepayment* serta data ekonomi terkini.
d. Pengendalian
   Manajemen mengambil langkah-langkah pengendalian risiko, termasuk tindakan pencegahan terhadap potensi kerugian yang lebih besar.

Dalam manajemen risiko pasar, Bank mempertimbangkan strategi *trading* Bank, posisi pasar, komposisi instrumen/produk, dan kategori nasabah Bank. *Trading book* mencakup seluruh posisi instrumen keuangan dalam neraca dan rekening administratif, termasuk transaksi derivatif yang dimiliki Bank dengan tujuan untuk diperdagangkan dan dilindungi nilai secara keseluruhan dan untuk transaksi kepentingan sendiri (*proprietary positions*), atas permintaan nasabah, atau untuk kepentingan perantaraan (*brokering*) dan pembentukan pasar (*market making*) dan lindung nilai (*hedging*) atas posisi lainnya dalam *trading book*.

a. Pengelolaan Risiko *Trading Book*

1) Pemisahan *trading book* dan *banking book*, setiap transaksi harus diakui secara jelas sebagai bagian dari *trading book* atau *banking book* sejak transaksi tersebut dibukukan.

changes in market conditions on the Bank's assets and capital. The Bank maintains market risk exposure within internal and regulatory limits, with due observance of capital adequacy and income.

The implementation of market risk management aims to minimize the negative impact of changes in market conditions on assets and capital. The scope of this application includes:

a. Active supervision by the Board of Commissioners and Board of Directors;
b. Adequacy of policies, procedures, and determination of market risk limits;
c. The process of risk identification, measurement, monitoring, and control, as well as implementation of market risk management information system; and
d. Adequate internal control system to manage market risk effectively.

The risk management process for market risk is as follows:

a. Identification
   The Bank periodically identifies market risks, including interest rate and exchange rate risks.
b. Measurement
   The Bank uses market risk measurement system or model to measure the position and sensitivity of market risk, both under normal conditions and stress testing.
c. Monitoring
   The Bank monitors risk limit compliance on a daily basis and takes follow-up action if the limit is exceeded. To monitor interest rate risk in the banking book, the reports used include non-maturity deposit behavior, prepayment information, and current economic data.

d. Control
   The Management takes risk control measures, including preventive measures against potential greater losses.

In market risk management, the Bank considers the Bank's trading strategy, market position, instrument/product composition, and customer categories. The trading book includes all positions of financial instruments in the balance sheet and administrative accounts, including derivative transactions owned by the Bank for the purpose of trade and hedged as a whole and for proprietary positions, at the request of customer, or for brokering activities, and to conduct market making and hedging of other positions in the trading book.

a. Trading Book Risk Management

1) Separation of trading book and banking book, every transaction must be clearly recognized as part of trading book or banking book since the transaction was recorded.

2) Kontrol risiko, semua produk baru dan variasi produk yang telah disetujui harus dikaji dan disetujui sesuai dengan kebijakan dan prosedur peluncuran produk baru.
3) Tata kelola surat berharga, di mana transaksi surat berharga harus sesuai dengan limit *trading book* terkini, serta memperhatikan kontrol risiko kredit terkait kepemilikan surat berharga.
4) Transaksi ke pasar (*market facing*) dan aktivitas internal suatu desk tertentu bertindak sebagai titik kontak dengan pasar keuangan eksternal, guna melakukan transaksi instrumen yang sama antara 2 (dua) buku untuk menghindari kerugian *bid-offer spread* terhadap pihak eksternal.

b. Pengelolaan Risiko *Banking Book*

1) Klasifikasi *banking book* yaitu semua posisi yang bukan untuk tujuan trading dikategorikan sebagai *banking book*.
2) Tata kelola *banking book* yaitu ALCO, Komite Kredit, dan tim pengelolaan portofolio bertanggung jawab atas aktivitas *banking book*, termasuk pengelolaan surat berharga aset dan kewajiban lainnya di bawah *Treasury*.
3) Transfer atau pengklasifikasian ulang banking book, misalnya antara *Fair Value Through Other Comprehensive Income* (FVTOCI) dan *amortised cost*, yang harus mengikuti ketentuan yang berlaku.
4) Pengelolaan risiko suku bunga dalam *banking book* (IRRBB) yaitu Bank melakukan pemantauan dan pengendalian risiko IRRBB guna mengelola dampak perubahan suku bunga terhadap profitabilitas dan permodalan.
5) Pengelolaan risiko nilai tukar (*foreign exchange risk*) dilakukan dengan meminimalkan eksposur *foreign exchange* diminimalkan, terutama dalam banking book, di mana ada posisi yang tidak dilindungi nilai ditransfer ke *trading book*.

Untuk transaksi yang dilakukan dalam rangka *hedging*, Bank perlu memastikan:

1) Pencatatan yang dilakukan sesuai standar akuntansi, tanpa menyebabkan penyimpangan dalam pengakuan pendapatan;
2) Transaksi sesuai dengan instruksi atau rekomendasi manajemen atau ALCO;
3) Memitigasi risiko pasar, dengan melakukan penilaian menilai berkala terhadap efektivitas lindung nilai, khususnya dalam perhitungan rasio *hedging*;
4) Pemantauan dan evaluasi rasio lindung nilai dari waktu ke waktu; dan
5) Penilaian kredibilitas pihak lawan transaksi dan pencegahan terhadap konsentrasi penempatan risiko.

2) Risk control, all new products and variations of approved product must be reviewed and approved in accordance with policies and procedures of new product launch.
3) Governance for securities, in which securities transaction must be in accordance with the current trading book limits, and pay attention to credit risk controls related to securities ownership.
4) Market facing transactions and internal activities of a particular desk act as a point of contact with external financial markets, in order to make transaction in the same instrument between 2 (two) books to avoid losses in bid offer spread to external parties.

b. Banking Book Risk Management

1) Banking book classification, namely all positions that are not for trading purposes are categorized as banking book.
2) Banking book governance, namely ALCO, Credit Committee, and portfolio management team are responsible for banking book activities, including the management of securities assets and other liabilities under Treasury.
3) Banking book transfer or reclassification, for example between Fair Value Through Other Comprehensive Income (FVTOCI) and amortised cost, which must comply with the applicable regulations.
4) Management of interest rate risk in the banking book (IRRBB), in which the Bank monitors and controls IRRBB risk to manage the impact of changes in interest rates on profitability and capital.
5) Management of foreign exchange is carried out by minimizing foreign exchange exposure, particularly in the banking book, in which unhedged positions are transferred to the trading book.

For transactions carried out for hedging purposes, the Bank needs to ensure:

1) Recording is made in accordance with accounting standards, without causing irregularities in revenue recognition;
2) Transactions are in accordance with instructions or recommendations from the management or ALCO;
3) Mitigating market risk, by conducting periodic assessments of the effectiveness of hedging, particularly in calculating the hedging ratio;
4) Monitoring and evaluating the hedging ratio from time to time; and
5) Assessing the credibility of counterparty and preventing concentration of risk placement.

2. Struktur Organisasi Manajemen Risiko Pasar

Struktur organisasi manajemen risiko pasar disesuaikan dengan karakteristik dan kompleksitas kegiatan usaha Bank. Adapun struktur organisasi manajemen risiko pasar diuraikan sebagai berikut:

a. Lini Pertahanan Pertama, merupakan unit bisnis khususnya Divisi *Treasury*;
b. Lini Pertahanan Kedua, unit yang bertanggung jawab adalah Divisi *Risk Management/Integrated*; dan
c. Lini Pertahanan Ketiga, merupakan Divisi SKAI.

Dalam pengelolaan risiko pasar, Bank memiliki *Asset and Liabilities Committee* (ALCO) yang membahas hal-hal terkait pengelolaan risiko pasar yang dilakukan secara berkala termasuk pemantauan limit dan Komite Manajemen Risiko yang berfungsi untuk memantau tingkat risiko Bank.

3. Ruang Lingkup dan Sifat Pelaporan Risiko Pasar

Penerapan manajemen risiko pasar tidak hanya berfokus pada pengelolaan risiko, tetapi juga pada pemantauan risiko yang dihadapi Bank akibat pergerakan faktor pasar seperti suku bunga dan nilai tukar. Penerapan manajemen risiko pasar dilakukan melalui langkah-langkah berikut:

a. Pengelolaan risiko suku bunga dan nilai tukar terhadap instrumen keuangan dalam *trading book* dan *banking book;*
b. Menerapkan berbagai metode mitigasi, termasuk penetapan limit berdasarkan jenjang organisasi, kebijakan mengenai *limit cut loss* untuk memantau risiko lebih efektif;
c. Menetapkan peringatan dini dengan mengukur sensitivitas pendapatan bunga bersih terhadap pergerakan suku bunga; dan
d. Melakukan *stress testing* guna menilai ketahanan Bank dalam menghadapi perubahan suku bunga dan harga pasar valuta asing dalam keadaan ekstrem.

Dalam pengukuran risiko pasar, Bank juga mempertimbangkan Aset Tertimbang Menurut Risiko (ATMR) untuk risiko pasar dengan menggunakan pendekatan standar dalam perhitungan rasio Kewajiban Penyediaan Modal Minimum (KPMM), sesuai dengan Surat Edaran Otoritas Jasa Keuangan No. 23/SEOJK.03/2022 tentang Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Pasar bagi Bank Umum.

Profil dan kinerja risiko pasar dievaluasi secara berkala dan dilaporkan kepada manajemen Bank, meliputi:

a. Pemantauan eksposur risiko pasar guna memastikan kepatuhan terhadap limit yang ditetapkan;
b. *Stress test* risiko pasar untuk mengukur ketahanan Bank dalam menghadapi skenario ekstrem; dan
c. Laporan Profil Risiko untuk Risiko Pasar sebagai bagian dari evaluasi dan mitigasi risiko.

2. Organizational Structure of Market Risk Management

The market risk management organizational structure is adapted to the characteristics and complexity of the Bank's business activities. The organizational structure of market risk management is described as follows:

a. The First Line of Defense, is a business unit, particularly the Treasury Division;
b. The Second Line of Defense, the unit being responsible is the Risk Management Division/Integrated; and
c. Third Line of Defense, is the SKAI Division.

In managing market risk, the Bank has an Asset and Liabilities Committee (ALCO) that periodically discusses matters related to market risk management, including limit monitoring and Risk Management Committee that functions to monitor the Bank's risk level.

3. Scope and Nature of Market Risk Reporting

The implementation of market risk management does not only focus on risk management, but also on monitoring the risks faced by the Bank due to movements in market factors such as interest rates and exchange rates. The implementation of market risk management is done through the following steps:

a. Management of interest rate risk exchange rate on financial instruments in trading book and banking book;
b. Applying various mitigation methods, including setting limits based on organizational levels, policy on limit for cut loss to monitor risks more effectively;
c. Establishing early warnings by measuring the sensitivity of net interest income to interest rate movements; and
d. Conducting stress testing to assess the Bank's resilience in facing changes in interest rates and foreign exchange market price in extreme conditions.

In measuring market risk, the Bank also considers Risk-Weighted Assets (RWA) for market risk by using the standard approach in calculating the Capital Adequacy Ratio (CAR), in accordance with the Financial Services Authority Circular No. 23/SEOJK.03/2022 on Calculation of Risk-Weighted Assets for Market Risk of Commercial Banks.

The market risk profile and performance are evaluated periodically and reported to the Bank's management, including:

a. Monitoring market risk exposure to ensure compliance with the established limits;
b. Market risk stress test to measure the Bank's resilience in facing extreme scenarios; and
c. Risk Profile Report for Market Risk as part of risk evaluation and mitigation.

Pengungkapan kuantitatif eksposur risiko pasar sebagai berikut. Tabel Pengungkapan Kuantitatif Eksposur Risiko Pasar dengan Menggunakan Metode Standar secara Individual.

Pengungkapan Terkait *Credit Valuation Adjustment* (CVA)

1. **Proses Manajemen Risiko untuk CVA**
   CVA diidentifikasi adalah risiko yang muncul akibat perubahan nilai eksposur derivatif, yang disebabkan oleh perubahan *spread* kredit pihak lawan. Risiko ini terutama dari transaksi derivatif dengan perusahaan keuangan, pemerintah, dan entitas non-keuangan yang memiliki eksposur terhadap pergerakan pasar dan tingkat kredit. Pengukuran CVA dilakukan dengan pendekatan kuantitatif yang mempertimbangkan *Exposure at Default* (EAD), *Probability of Default* (PD), *Loss Given Default* (LGD), dan *Discount Factor* (DF).
2. **Metode yang Digunakan untuk Menentukan Besaran CVA**
   Bank menentukan besaran CVA dengan merujuk pada Surat Edaran Otoritas Jasa Keuangan No. 23/SEOJK.03/2022 tentang Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Pasar. Bank menggunakan *Standardized Approach Counterparty Credit Risk* (SA-CCR) dengan beban modal 100% dalam menentukan besaran CVA.

Metode Valuasi/*Mark-to-Market*

Salah satu aspek yang paling mendasar dalam pelaksanaan *mark-to-market* adalah prinsip kehati-hatian Bank dalam menentukan metode penilaian (valuasi) yang digunakan untuk setiap instrumen seperti penggunaan metode *mark-to-market*, sumber informasi tentang nilai pasar yang digunakan, perlakuan terhadap instrumen yang kurang/tidak likuid, serta kebijakan pencadangan terhadap nilai keuntungan akibat proses *mark-to-market*.

Terhadap instrumen keuangan yang diperdagangkan secara aktif, proses valuasi dilakukan dengan menggunakan harga transaksi yang terjadi (*close-out prices*) atau kuotasi pasar dari sumber yang independen. Valuasi terhadap instrumen keuangan menggunakan:

1. *Bid price* untuk aset yang dimiliki atau kewajiban yang akan diterbitkan; dan/atau
2. *Ask price* untuk aset yang akan diperoleh atau kewajiban yang dimiliki.

Bank dapat menetapkan nilai wajar dengan menggunakan suatu model atau teknik penilaian apabila harga pasar tidak tersedia. Valuasi dilakukan secara harian terhadap seluruh posisi *treasury*.

Pengukuran Risiko Pasar pada *Trading Book* maupun *Banking Book*

Bank menerapkan beberapa metode dalam mitigasi kerugian yang mungkin timbul dari risiko pasar. Metode pengukuran risiko pasar tersebut di antaranya:

1. Bank menggunakan pendekatan standar mengacu pada ketentuan Otoritas Jasa Keuangan untuk mengukur risiko pasar Kewajiban Penyediaan Modal Minimum dan metric Risiko Suku Bunga dalam *Banking Book* (IRRBB) yaitu nilai ekonomis ekuitas (EVE) dan pendapatan bunga bersih (NII);

Quantitative disclosure of market risk exposure is as follows. Table of Quantitative Disclosure of Market Risk Exposure by Using Standardized Method Individually.

Disclosure Related to Credit Valuation Adjustment (CVA)

1. **Risk Management Process for CVA**
   CVA is identified as the risk that arises due to changes in the value of derivative exposure, which is caused by changes in counterparty's credit spread. This risk is mainly from derivative transactions with financial companies, governments, and non-financial entities that have exposure to market movements and credit levels. CVA measurement is carried out by using quantitative approach that considers Exposure at Default (EAD), Probability of Default (PD), Loss Given Default (LGD), and Discount Factor (DF).
2. **Method Used to Determine the Amount of CVA**
   The Bank determines the amount of CVA by referring to the Financial Services Authority Circular No. 23/SEOJK.03/2022 on Calculation of Risk-Weighted Assets for Market Risk. Bank Victoria applies Standardized Approach for Counterparty Credit Risk (SA-CCR) with a capital burden of 100% in determining the amount of CVA.

Valuation Method/Mark-to-Market

One of the most fundamental aspects in implementing mark-to-market is the Bank's prudential principles in determining valuation method used for each instrument, such as the use of the mark-to-market method, the source of information about market value used, the treatment of deficient/illiquid instruments, as well as reserve policies for profit values due to the mark-to-market process.

For financial instruments that are actively traded, the valuation process is carried out using close-out prices or market quotations from independent sources. Valuation of financial instruments uses:

1. Bid price for assets owned or liabilities to be issued; and/or
2. Ask price for assets to be acquired or liabilities owned.

The Bank can determine fair value by using a valuation model or technique if market prices are not available. Valuation is carried out daily on all treasury positions.

Market Risk Measurement in Trading Book and Banking Book

The Bank applies several methods in mitigating loss that may incur from market risk. These market risk measurement methods include:

1. The Bank uses a standard approach referring to the provisions of the Financial Services Authority to measure market risk. Capital Adequacy Ratio and Interest Rate Risk metrics in the Banking Book (IRRBB), namely economic value of equity (EVE) and net interest income (NII);

2. *Stress testing* digunakan untuk menilai kemampuan finansial di bawah kejadian-kejadian yang ekstrem tapi mungkin terjadi. Dalam analisis skenario dan *stress testing*, dapat digunakan dengan menggunakan analisis data historis, menggunakan asumsi hipotetis atau menggunakan scenario yang ditetapkan regulator;
3. Pengukuran risiko suku bunga pada posisi *banking book* paling kurang menggunakan model pengukuran *gap report*. *Gap report* menyajikan pos-pos aset, kewajiban, dan rekening administratif yang bersifat *interest rate sensitive* untuk dipetakan ke dalam skala waktu tertentu; dan
4. Proses kaji ulang atau validasi atas model pengukuran risiko pasar dilakukan secara berkala oleh pihak independen antara lain melalui *back testing*, termasuk melakukan penyempurnaan jika diperlukan.

Pengungkapan Mengenai *Interest Rate Risk in Banking Book*

Bank berada dalam kelompok Bank Modal Inti/KBMI 1, berdasarkan Peraturan Otoritas Jasa Keuangan No. 12/POJK.03/2021 dan tidak memenuhi kriteria untuk mengungkapkan laporan perhitungan *Interest Rate Risk in Banking Book* (IRRBB) sesuai Surat Edaran Otoritas Jasa Keuangan No. 12/SEOJK.03/2018 tanggal 21 Agustus 2018 tentang Penerapan Manajemen Risiko dan Pengukuran Risiko Pendekatan Standar untuk Risiko Suku Bunga dalam *Banking Book* (IRRBB) bagi Bank Umum. Dalam hal mengendalikan risiko suku bunga pada *banking book*, Bank menggunakan analisa sensitivitas berdasarkan *repricing gap* yang disusun dalam rangka pemenuhan ketentuan mengenai penilaian tingkat kesehatan Bank Umum dan penerapan manajemen risiko bagi Bank Umum. Parameter tersebut dapat memberikan indikasi atas risiko terhadap perspektif nilai ekonomis Bank yang timbul dari pergerakan suku bunga yang memengaruhi permodalan dan perspektif pendapatan bunga bersih yang memengaruhi rentabilitas Bank.

Risiko Likuiditas

Risiko likuiditas adalah risiko akibat ketidakmampuan Bank untuk memenuhi kewajiban yang jatuh tempo dari sumber pendanaan arus kas dan/atau dari aset likuiditas berkualitas tinggi yang dapat diagunkan tanpa mengganggu aktivitas keuangan Bank. Risiko likuiditas dikategorikan menjadi:

1. Risiko likuiditas pasar
   Risiko yang timbul karena Bank tidak mampu melakukan *off setting* posisi tertentu dengan harga pasar.
2. Risiko likuiditas pendanaan
   Risiko yang timbul karena Bank tidak mampu mencairkan asetnya atau memperoleh pendanaan dari sumber dana lainnya.

Ketidakmampuan memperoleh sumber pendanaan arus kas dapat menimbulkan risiko likuiditas yang disebabkan oleh:

1. Ketidakmampuan menghasilkan arus kas yang berasal dari aset produktif maupun yang berasal dari penjualan aset termasuk aset likuid; dan

2. Stress testing is used to assess financial capabilities under extreme but possible events. Historical data analysis, hypothetical assumptions, or scenarios set by the regulator can be used to analyze scenario and stress testing;
3. Interest rate risk in banking book positions is measured at least by using the gap report measurement model. The gap report presents asset, liability, and administrative account items that are interest rate sensitive to be mapped to a certain time scale; and
4. The process of reviewing or validating the market risk measurement model is carried out periodically by an independent party, among others through back testing, including making improvements if necessary.

Disclosure of Information on the Interest Rate Risk in Banking Book

The Bank is within the Bank Group/KBMI 1, based on Financial Services Authority Regulation No. 12/POJK.03/2021 and does not meet the criteria to disclose calculation report of Interest Rate Risk in Banking Book (IRRBB) in accordance with Financial Services Authority Circular No. 12/SEOJK.03/2018 dated 21 August 2018 on the Implementation of Risk Management and Risk Measurement Using Standardized Approach for Interest Rate Risk in the Banking Book (IRRBB) for Commercial Banks. In terms of controlling the interest rate risk in banking book, the Bank uses sensitivity analysis based on the repricing gap prepared in order to fulfill the provisions on the sound rating of Commercial Banks and the implementation of risk management at Commercial Banks. This parameter may provide an indication of the risks to the Bank's economic value perspective arising from interest rate scenario movement affecting capital and net interest income perspective which affect the Bank's profitability.

Liquidity Risk

Liquidity risk is a risk due to the Bank's inability to meet its due liabilities from the funding cash flows and/or from high quality liquid assets that can be pledged, without disrupting the Bank's financial activity. The liquidity risk is categorized into:

1. Market liquidity risk
   The risk arising due to the Bank is unable to offset certain positions at market prices.
2. Funding liquidity risk
   The risk arising due to the Bank is unable to withdraw the assets or obtain funding from other sources of funds.

Inability to acquire cash flows of source of fund can cause liquidity risk resulting from:

1. Inability to generate cash flows from earning assets or from the sale of assets including liquid assets; and

2. Ketidakmampuan menghasilkan arus kas yang berasal dari penghimpunan dana, transaksi antar Bank, dan pinjaman yang diterima.

Tujuan utama manajemen risiko untuk risiko likuiditas adalah untuk meminimalkan kemungkinan ketidakmampuan Bank dalam memperoleh sumber pendanaan arus kas.

Tata Kelola Pengelolaan Risiko Likuiditas

1. *Risk appetite* dan toleransi risiko dikaji oleh *Risk Taking Unit* minimal setahun sekali, serta harus mendapat persetujuan Komite Manajemen Risiko atau Direksi dan Dewan Komisaris. Setiap pelanggaran *risk appetite* dan toleransi risiko harus dieskalasi hingga ke Dewan Komisaris dan/atau tingkat Komite Dewan Komisaris terkait seperti Komite Pemantau Risiko;
2. Kebijakan manajemen risiko likuiditas harus disetujui oleh Komite Manajemen Risiko atau ALCO yang dikaji secara berkala dan memenuhi persyaratan regulasi;
3. Limit risiko likuiditas harus disetujui oleh ALCO. Limit tersebut harus dikaji paling sedikit setiap tahun dengan mempertimbangkan strategi bisnis dan *risk appetite* Bank;
4. Likuiditas Bank dikelola secara tersentralisasi oleh *Treasury*; dan
5. Validasi model pengukuran risiko harus dilakukan secara berkala oleh pihak yang independen dari pengembang dan pengguna model tersebut.

Struktur Organisasi Manajemen Risiko Likuiditas

Struktur organisasi manajemen risiko likuiditas telah dirancang agar dapat bekerja secara optimal dengan mengutamakan prinsip kehati-hatian melalui implementasi *dual control process* serta pemantauan secara harian atas indikator peringatan dini likuiditas Bank. Struktur organisasi manajemen risiko likuiditas diuraikan sebagai berikut:

1. Lini Pertahanan Pertama adalah semua unit bisnis;
2. Lini Pertahanan Kedua adalah Divisi *Risk Management/Integrated* dan Divisi *Compliance, System Procedure & Customer Protection;*
3. Lini Pertahanan Ketiga adalah Divisi SKAI.

Strategi Pendanaan

Strategi bidang pendanaan diprioritaskan pada upaya menjaga dan meningkatkan loyalitas nasabah dan menambah nasabah baru dengan target pertumbuhan yang berbasis struktur pendanaan yang sehat dan optimal. Strategi pendanaan di antaranya mencakup strategi diversifikasi sumber dan jangka waktu pendanaan yang dikaitkan dengan karakteristik dan Rencana Bisnis Bank. Dalam hal ini Bank mengidentifikasi dan memantau faktor utama yang memengaruhi kemampuan Bank untuk memperoleh dana, termasuk mengidentifikasi dan memantau alternatif pendanaan yang dapat memperkuat kapasitasnya untuk bertahan pada kondisi krisis.

2. Inability to generate cash flows from fund raising, interbank transactions, and loans.

The main objective of risk management for liquidity risk is to minimize the possibility of the Bank's inability to obtain source of fund for cash flow.

Liquidity Risk Management Governance

1. Risk appetite and risk tolerance are reviewed by the Risk Taking Unit at least once a year, and such review must obtain approval from the Risk Management Committee or the Board of Directors and Board of Commissioners. Any violation of risk appetite and risk tolerance must be escalated to the Board of Commissioners and/or the relevant Board of Commissioners Committee level, such as the Risk Monitoring Committee;
2. The liquidity risk management policy must be approved by the Risk Management Committee or ALCO, reviewed periodically and fulfilling the regulatory requirements;
3. Liquidity risk limits must be approved by ALCO. This limit must be reviewed at least annually by considering the Bank's business strategy and risk appetite;
4. The Bank's liquidity is managed centrally by the Treasury; and
5. Validation of risk measurement models must be carried out periodically by parties independent of the developers and users of the model.

Liquidity Risk Management Organizational Structure

The liquidity risk management organizational structure has been designed to work optimally by prioritizing prudential principles through the implementation of dual control processes and daily monitoring of the Bank's liquidity early warning indicators. The liquidity risk management organizational structure is described below:

1. The First Line of Defense is all business units;
2. The Second Line of Defense is the Risk Management/ Integrated Division and the Compliance, System Procedure & Customer Protection Division;
3. The Third Line of Defense is SKAI Division.

Funding Strategy

The funding strategies are prioritized on efforts to maintain and increase customer loyalty and add new customers with a growth target based on a sound and optimal funding structure. The funding strategy includes a diversification strategy of funding sources and time period that link to the Bank's characteristics and business plans. In this matter, the Bank identifies and monitors the main factors affecting the Bank's ability to obtain funds, including identifying and monitoring alternative funding that can strengthen its capacity to withstand crisis conditions.

Mitigasi Risiko Likuiditas

Dalam memitigasi risiko likuiditas, Bank menetapkan indikator peringatan dini, di antaranya dengan menentukan *risk appetite* dan *risk tolerance/limit* melalui beberapa indikator keuangan seperti rasio alat likuid terhadap dana pihak ketiga dan rasio alat likuid terhadap *non-core* deposit yang adaptif terhadap perubahan.

Stress Testing Risiko Likuiditas

Bank mengembangkan *stress testing* likuiditas untuk memastikan Bank memiliki akses sumber likuiditas yang cukup untuk bertahan pada kondisi *stress event* untuk periode tertentu yang telah ditentukan. *Stress testing* merupakan metode yang penting dalam pengelolaan likuiditas untuk memastikan Bank selalu berada pada posisi dapat memenuhi seluruh kewajibannya, membayar kembali deposan, memenuhi komitmen pemberian pinjaman, dan memenuhi komitmen lainnya yang dibuat baik dalam kondisi normal maupun stres.

Hasil *stress test* risiko likuiditas dapat menjadi masukan dalam melakukan kaji ulang terhadap kebijakan dan strategi manajemen risiko likuiditas, komposisi aset, kewajiban dan/atau rekening administratif, rencana pendanaan darurat (*contingency funding plan)* dan penetapan limit.

Pengelolaan Risiko Likuiditas pada Saat Krisis

Dalam menghadapi krisis likuiditas, Bank telah memiliki *Liquidity Contingency Plan* (LCP) yang secara formal menetapkan strategi untuk menghadapi krisis likuiditas dan prosedur untuk menutup defisit arus kas dalam situasi darurat. LCP mencakup kebijakan, strategi, prosedur dan rencana tindak untuk memastikan kemampuan Bank memperoleh sumber pendanaan yang diperlukan secara tepat waktu dan dengan biaya yang wajar. Dokumen tersebut disosialisasikan kepada unit-unit terkait agar dapat memahami tugas dan tanggung jawabnya masing-masing.

Pengungkapan Risiko Likuiditas

1. Pengungkapan mengenai *Liquidity Coverage Ratio* dan Aset Terikat (*Encumbrance*/ENC) mengacu pada Peraturan Otoritas Jasa Keuangan No. 19 Tahun 2024 tentang Perubahan atas Peraturan Otoritas Jasa Keuangan No. 42/POJK.03/2015 tentang Kewajiban Pemenuhan Rasio Kecukupan Likuiditas (*Liquidity Coverage Ratio*) bagi Bank Umum.
   a. Tabel Perhitungan Rasio Kecukupan Likuiditas (LCR).
   b. Tabel Pengungkapan Aset Terikat (*Encumbrance*/ENC).
2. Pengungkapan *Nett Stable Funding Ratio* Bank mengacu pada Peraturan Otoritas Jasa Keuangan No. 20 Tahun 2024 tentang Perubahan atas Peraturan Otoritas Jasa Keuangan No. 50/POJK.03/2017 tentang Kewajiban Pemenuhan Rasio Pendanaan Stabil Bersih (*Net Stable Funding Ratio*) Bagi Bank Umum.
   Tabel Laporan Kewajiban Pemenuhan Rasio Pendanaan Stabil Bersih (NSFR).

Mitigation of Liquidity Risk

In mitigating liquidity risk, the Bank establishes early warning indicators, among others by determining risk appetite and risk tolerance/limit through several financial indicators such as the ratio of liquid assets to third party deposits and the ratio of liquid assets to non-core deposits that are adaptive to change.

Stress Testing of Liquidity Risk

The Bank develops liquidity stress testing to ensure the Bank has access to sufficient liquidity sources to survive stress event conditions for a certain predetermined period. Stress testing is an important method in managing liquidity to ensure that the Bank is always in a position to fulfill all its obligations, repay depositors, fulfill loan commitments, and fulfill other commitments made both under normal and stressed conditions.

The results of the liquidity risk stress test can be used as input for reviewing liquidity risk management policies and strategies, composition of assets, liabilities, and/or administrative accounts, contingency funding plan, and limit setting.

Liquidity Risk Management in Times of Crisis

To deal with liquidity crisis, the Bank already has a Liquidity Contingency Plan (LCP) that formally sets out strategies to deal with liquidity crisis and procedures to cover cash flow deficits in emergency situations. LCP includes policies, strategies, procedures, and action plans to ensure the Bank's ability to obtain the necessary source of fund in a timely manner and at a reasonable cost. The document is disseminated to the relevant units so that such units can understand their respective duties and responsibilities.

Disclosure of Liquidity Risk

1. Disclosure on Liquidity Coverage and Encumbrance (ENC) refers to the Financial Services Authority Regulation No. 19 of 2024 on Amendment to Financial Services Authority Regulation No. 42/POJK.03/2015 on the Obligation of Fulfillment of Liquidity Coverage Ratio for Commercial Banks.

   a. Liquidity Coverage Ratio (LCR) Calculation Table.
   b. Table of Disclosure of Encumbrance (ENC).
2. Disclosure of the Bank's Nett Stable Funding Ratio refers to Financial Services Authority Regulation No. 20 of 2024 on Amendment to Financial Services Authority Regulation No. 50/POJK.03/2017 on Obligation of Fulfillment of Net Stable Funding Ratio for Commercial Banks.

   Table of Report on Obligation of Fulfillment of Net Stable Funding Ratio (NSFR).

Risiko Operasional

Risiko operasional adalah risiko akibat ketidakcukupan dan/atau tidak berfungsinya proses internal, kesalahan manusia, kegagalan sistem, dan/atau adanya kejadian-kejadian eksternal yang memengaruhi operasional Bank.

Tujuan utama manajemen risiko untuk risiko operasional adalah untuk meminimalkan kemungkinan dampak negatif dari tidak berfungsinya proses internal, kesalahan manusia, kegagalan sistem, dan/atau kejadian-kejadian eksternal.

Manajemen risiko operasional dilakukan secara konsisten terhadap kerangka kerja serta dengan menentukan strategi dan mitigasi guna memperoleh keseimbangan yang optimal antara paparan risiko operasional, efektivitas mekanisme kontrol, dan pembuatan *risk appetite*.

Struktur Organisasi Manajemen Risiko Operasional

Penerapan manajemen risiko operasional banyak melibatkan berbagai pihak dalam Bank melalui penerapan 3 (tiga) lini pertahanan (*three lines of defense*) yang berfungsi sebagai berikut:

1. Lini Pertahanan Pertama merupakan unit bisnis dan unit pendukung yang berperan sebagai *risk taker*;
2. Lini Pertahanan Kedua adalah Unit AML, CTF & WMD dan Divisi *Risk Management/Integrated*; dan
3. Lini Pertahanan Ketiga merupakan unit yang dijalankan Divisi SKAI.

Dalam pengelolaan risiko operasional, di samping Komite Manajemen Risiko, Bank memiliki komite lain di antaranya Komite Teknologi Informasi, Komite Pengadaan, Komite Produk, dan Komite Personalia untuk menunjang operasional Bank yang secara efektif dapat menekan kerugian akibat risiko operasional.

Mekanisme yang Digunakan Bank untuk Mengidentifikasi dan Mengukur Risiko Operasional

Proses identifikasi dan pengukuran risiko dilakukan melalui penerapan perangkat manajemen risiko operasional, yakni *risk register* dengan tujuan untuk mengidentifikasi risiko-risiko pada aktivitas fungsional risiko operasional, sehingga kerugian maksimum yang mungkin timbul di masa mendatang dapat diminimalisir. *Risk Register* yang dipergunakan untuk pelaksanaan manajemen risiko operasional sebagai berikut:

1. *Risk and Control Self-Assessment*
   Risk and Control Self-Assessment (RCSA) merupakan alat untuk mengidentifikasi dan mengukur risiko operasional yang bersifat kualitatif dan prediktif dengan menggunakan dimensi dampak dan kemungkinan kejadian. RCSA umumnya difokuskan pada risiko-risiko yang memiliki dampak terhadap kemampuan Bank dalam menjaga kelangsungan bisnis dan operasional. Proses penilaian risiko dilakukan dengan melakukan *self-assessment* tentang evaluasi tingkat risiko, yang mencakup kemungkinan kejadian, besarnya dampak, dan tingkat efektivitas kontrol.

Operational Risk

Operational Risk is risk due to inadequacy and/or malfunction of internal process, human error, system failure, and/or external incidents affecting the Bank's operations.

The main objective of risk management for operational risk is to minimize the possible negative impacts of non-functioning internal processes, human errors, system failures, and/or external events.

Operational risk management is carried out consistently on framework and by determining strategies and mitigation in order to obtain maximum balance between operational risk exposure, effectiveness of control mechanism, and risk appetite establishment.

Operational Risk Management Organizational Structure

The operational risk management implementation highly involves many parties in the Bank through the implementation of three lines of defense which function as follows:

1. First line of defense is a business unit and supporting unit that functions as risk taker;
2. Second Line of Defense is the AML, CTF & WMD Unit and Risk Management/Integrated Division; and
3. Third Line Defense is a unit run by the SKAI Division.

In managing operational risk, in addition to the Risk Management Committee, the Bank has other committees including the Information Technology Committee, Procurement Committee, Product Committee, and Personnel Committee to support the Bank's operations which can effectively reduce losses due to operational risk.

Mechanism Used by the Bank to Identify and Measure Operational Risk

Risk identification and measurement process is performed by applying operational risk management tools, namely risk register aimed to identify risks in operational risk functional activities so that maximum losses that may arise in the future can be minimized. The Risk Registers used for the implementation of operational risk management are as follows:

1. Risk and Control Self-Assessment
   Risk and Control Self-Assessment (RCSA) is a tool for identifying and measuring operational risks that are qualitative and predictive using the dimensions of impact and possible events. RCSA is generally focused on risks that have an impact on the Bank's ability to maintain its business and operational sustainability. The risk assessment process is carried out by conducting self-assessment of risk level evaluation, including possible events, magnitude of impacts, and control effectiveness level. Furthermore, RCSA detects the adequacy

Selanjutnya, RCSA mendeteksi kecukupan internal control Bank untuk mencegah penyimpangan/kegagalan yang terjadi, serta menerapkan pengendalian risiko operasional yang tepat untuk mengelola risiko operasional agar tetap berada dalam tingkatan toleransi risiko operasional.

2. *Key Risk Indicator*
   Key Risk Indicator (KRI) adalah perangkat yang lazim digunakan untuk mengidentifikasi dan menganalisis risiko sejak dini (*early warning*) atas naik-turunnya indikator-indikator tingkat risiko operasional yang melekat pada setiap aktivitas bisnis dan operasional Bank. Manfaat KRI antara lain dapat memantau dan memprediksi eksposur risiko operasional, serta mengidentifikasi perubahan profil risiko operasional. Indikator risiko utama memberikan informasi tentang risiko potensial kerugian di masa depan. Ambang batas (pemicu) dapat didefinisikan untuk KRI dan dapat berfungsi sebagai indikator dalam sistem peringatan dini.
3. *Loss Event Database*
   Loss Event Database (LED) merupakan alat/perangkat manajemen risiko operasional yang digunakan untuk mencatat/mengelola data kejadian yang telah terjadi dalam operasional Bank. *Database* kerugian, baik yang bersifat potensial maupun aktual merupakan prasyarat penting dalam proses penyusunan model pengukuran kerugian risiko operasional dan sebagai alat untuk melakukan validasi setiap proses penilaian risiko atau prediksi risiko.

Risiko operasional *inheren* (risiko yang melekat/*gross*) dan risiko residual diukur dengan menggunakan matriks Penilaian Risiko Operasional dengan mempertimbangkan dampak dan kemungkinan risiko itu sendiri. *Risk Taking Unit* harus mengukur bahwa kontrol memadai dan memastikan kelengkapan, keberadaan, keakuratan, otorisasi, penilaian, kepemilikan, penyajian, dan pelaporan transaksi dan/atau proses.

Mekanisme untuk Memitigasi Risiko Operasional

Guna memitigasi risiko operasional, Bank telah melakukan peningkatan sumber daya manusia melalui pendidikan dan pelatihan secara berkelanjutan. Hal tersebut bertujuan agar kemampuan karyawan dalam melaksanakan tugas dapat berjalan dengan lebih baik. Selain itu, Bank telah melakukan evaluasi dan revisi atas kebijakan dan sistem prosedur yang sudah ada, memeriksa akses level, dan limit-limit transaksi sesuai dengan tugas dan tanggung jawab masing-masing karyawan, mengembangkan teknologi informasi serta menerapkan sistem pengendalian internal.

Untuk menjaga kelangsungan bisnis terhadap peristiwa yang tidak diinginkan, Bank mempunyai *Business Continuity Management* (BCM) dan juga telah memiliki *lokasi off site back up* yang digunakan pada saat pengujian BCM. Dalam penanggulangan bencana, Bank memiliki pusat data *(data center)* dan pusat penanggulangan bencana (*disaster recovery center*) yang terdapat di 2 (dua) lokasi berbeda di dalam negeri. Hal ini akan memungkinkan sistem-sistem penting, termasuk sistem inti, serta sistem pembayaran, dan sistem pelaporan regulator yang tetap berjalan jika terjadi bencana.

of the Bank's internal control to prevent any deviations/failures, and to apply appropriate operational risk controls to manage operational risk in order to stay within the operational risk tolerance level.

2. Key Risk Indicator
   Key Risk Indicator (KRI) is a common tool used to identify and analyze early warning on the upward and downward movement of indicators of operational risk level that is inherent in every business activity and operation of the Bank. KRI benefits include monitoring and predicting operational risk exposures and identifying changes of operational risk profile. The main risk indicators provide information on the risk of potential losses in the future. Thresholds (triggers) can be defined for KRI and can serve as indicators in an early warning system.

3. Loss Event Database
   Loss Event Database (LED) is an operational risk management tool/instrument used to record/manage incident data occurred during the Bank's operations. The database of losses, both potential and actual, is an important prerequisite in the process of formulating measurement model of operational risk loss and as a tool for validating every risk assessment or risk prediction process.

Inherent operational risk (gross risk) and residual risk are measured by using the Operational Risk Assessment matrix by considering the impact and possibility of the risk itself. The Risk Taking Unit must measure that controls are adequate and ensure completeness, existence, accuracy, authorization, assessment, ownership, presentation, and reporting of transactions and/or processes.

Operational Risk Mitigation Mechanism

In order to mitigate operational risk, the Bank has increased its human resources by carrying out continuous education and training. This is intended for enhancing employees' ability so that they can perform their duties properly. Furthermore, the Bank has also evaluated and revised the existing policies and system procedures, examined access level and transaction limits according to each employee's duties and responsibilities, developed information technology, and applied internal control system.

In order to maintain its business continuity against undesired events, the Bank has Business Continuity Management (BCM) and also already has an offsite back up location used during the BCM testing. In disaster management, the Bank has data center and disaster recovery center located in 2 (two) different locations within the country. This will enable the critical systems, including core systems, as well as payment systems, and regulatory reporting systems, to keep operating at times of disaster.

Pengungkapan Risiko Operasional

Dalam perhitungan Aset Tertimbang Menurut Risiko untuk risiko operasional, Bank mengacu kepada Peraturan Otoritas Jasa Keuangan No. 27 Tahun 2022 tentang Perubahan Kedua atas Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum Bagi Bank Umum dan Surat Edaran Otoritas Jasa Keuangan No. 06/SEOJK.03/2020 tentang Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Operasional dengan Menggunakan Pendekatan Standar bagi Bank Umum.

Pengungkapan Kuantitatif Eksposur Risiko sebagai berikut:

Tabel Pengungkapan Kuantitatif Risiko Operasional Bank secara Individual.

Disclosure of Operational Risk

In calculating Risk Weighted Assets for operational risk, the Bank refers to Financial Services Authority Regulation No. 27 of 2022 on the Second Amendment to the Financial Services Authority Regulation No. 11/POJK.03/2016 on Minimum Capital Adequacy Ratio for Commercial Banks and Financial Services Authority Circular No. 06/SEOJK.03/2020 on Calculation of Risk-Weighted Assets for Operational Risk by Using Standardized Approach for Commercial Banks.

Quantitative Disclosure of Risk Exposure is as follows:

Table of Quantitative Disclosure of Operational Risk of the Bank Individually.

Risiko Hukum

Risiko hukum merupakan risiko akibat tuntutan hukum dan/atau kelemahan aspek yuridis. Risiko hukum dapat bersumber antara lain dari kelemahan aspek yuridis yang disebabkan oleh lemahnya perikatan yang dilakukan oleh Bank, ketiadaan dan/atau perubahan peraturan perundang-undangan yang menyebabkan suatu transaksi yang telah dilakukan Bank menjadi tidak sesuai dengan ketentuan, dan proses litigasi, baik yang timbul dari gugatan pihak ketiga terhadap Bank maupun Bank terhadap pihak ketiga.

Tujuan utama manajemen risiko untuk risiko hukum adalah untuk memastikan bahwa proses manajemen risiko dapat meminimalkan kemungkinan dampak negatif dari kelemahan aspek yuridis, ketiadaan dan/atau perubahan peraturan perundang-undangan, dan proses litigasi.

Struktur Organisasi Manajemen Risiko Hukum

Penerapan manajemen risiko hukum banyak melibatkan berbagai pihak dalam Bank melalui penerapan 3 (tiga) lini pertahanan (*three lines of defense*) yang berfungsi sebagai berikut:

1. Lini Pertahanan Pertama, merupakan semua divisi;
2. Lini Pertahanan Kedua, terdiri dari Divisi *Corporate Legal*, dan Divisi *Compliance, System Procedure & Customer Protection*; dan
3. Lini Pertahanan Ketiga adalah Divisi SKAI.

Mekanisme Pengendalian Risiko Hukum

Langkah yang dilakukan dalam upaya mitigasi risiko hukum meliputi:

1. Standardisasi dokumen hukum terkait produk atau fasilitas perbankan yang ditawarkan oleh Bank kepada masyarakat. Dokumen tersebut dibuat dengan mengacu kepada ketentuan peraturan perundangan yang berlaku, serta memperhatikan kepentingan aspek yuridis dari Bank;
2. Memberikan opini hukum atas penyelenggaraan produk baru Bank sebelum diperkenalkan atau dipasarkan ke masyarakat;
3. Memantau perkembangan kasus-kasus hukum yang terjadi dan memberikan perhatian khusus atas kasus hukum yang berpotensi menimbulkan kerugian;

Legal Risk

Legal risk is a risk as a result of lawsuits and/or weakness of juridical aspect. Legal risk can be sourced from, among others, weaknesses in the juridical aspects caused by weak commitments made by the Bank, absence and/or changes in laws and regulations that cause a transaction made by the Bank becomes not in accordance with the provisions, and litigation processes either arising from third party claims against the Bank or the Bank against third parties.

The main objective of risk management for legal risk is to ensure that the risk management process minimizes the possibility of negative impact from weakness of juridical aspects, the absence of and/or amendment to laws and regulations and litigation process.

Organizational Structure of Legal Risk Management

The legal risk management implementation highly involves many parties in the Bank through the implementation of three lines of defense which function as follows:

1. The First Line of Defense, constitutes all divisions;
2. The Second Line of Defense, consists of the Corporate Legal Division, and Compliance, System Procedure & Customer Protection Division; and
3. The Third Line of Defense is SKAI Division.

Legal Risk Control Mechanism

Measures taken in the effort to mitigate legal risk includes:

1. Standardizing the legal documents related to banking products or facilities offered by the Bank to the public which will be made in accordance with the prevailing laws and regulations and taking into account the Bank's juridical aspect;
2. Providing legal opinion on the Bank's new products before launching or promoting to the public;
3. Monitoring the progress of legal cases and paying special attention to legal cases having the potential to cause loss;

4. Memberikan informasi dan pengetahuan hukum kepada unit-unit terkait;
5. Memastikan perjanjian-perjanjian dan dokumen dengan nasabah dan/atau pihak ketiga lainnya dilakukan sesuai dengan ketentuan yang berlaku;
6. Melakukan evaluasi atas dokumen-dokumen atau perjanjian-perjanjian guna mengamankan kepentingan hukum Bank; dan
7. Meningkatkan kemampuan dan pengetahuan sumber daya manusia, serta pengkajian atas perkara litigasi yang telah terjadi.

4. Providing legal information and knowledge to relevant units;
5. Ensuring that agreements and documents with customers and/or other third parties are carried out in accordance with the applicable regulations;
6. Evaluating documents or agreements to safeguard the Bank's legal interests; and
7. Increasing the capabilities and knowledge of human resources, as well as reviewing litigation cases that have occurred.

Risiko Reputasi

Risiko reputasi adalah risiko yang terkait atas persepsi negatif terhadap Bank yang dapat bersumber dari berbagai kejadian yang tidak diinginkan, antara lain publikasi negatif atas operasional Bank, pelanggaran etika bisnis, keluhan nasabah, kelemahan tata kelola, dan kejadian-kejadian lainnya yang dapat mengakibatkan penurunan citra Bank.

Tujuan utama manajemen risiko untuk risiko reputasi adalah untuk mengantisipasi dan meminimalkan dampak kerugian dari risiko reputasi Bank.

Reputation Risk

Reputation risk is a risk associated with negative perceptions on the Bank that can be sourced from various undesirable events, such as negative publicity of the Bank's operations, violations of business ethics, customer complaints, governance weaknesses, and other incidents that can result in a decrease image of the Bank.

The main objective of risk management for reputation risk is to anticipate and minimize the impact of losses from the Bank's reputation risk.

Struktur Organisasi Manajemen Risiko Reputasi

Pengelolaan risiko reputasi melibatkan berbagai pihak dalam Bank melalui penerapan 3 (tiga) lini pertahanan *(three lines of defense)* yang berfungsi sebagai berikut:

1. Lini Pertahanan Pertama merupakan Direksi dan seluruh karyawan;
2. Lini Pertahanan Kedua, terdiri dari Divisi *Corporate Secretary* dan Divisi *Risk Management/Integrated*; dan
3. Lini Pertahanan Ketiga adalah Divisi SKAI.

Organizational Structure of Reputation Risk Management

Reputation risk management involves various parties within the Bank through the implementation of three lines of defense which function as follows:

1. The First Line of Defense is the Board of Directors and all employees;
2. The Second Line of Defense, consists of the Corporate Secretary Division and Risk Management/Integrated Division; and
3. The Third Line of Defense is SKAI Division.

Kebijakan dan Mekanisme dalam Rangka Meningkatkan Kualitas Pelayanan kepada Nasabah dan Pemangku Kepentingan Lainnya untuk Mengendalikan Risiko Reputasi

Bank telah membentuk layanan *contact center* yang secara khusus menangani keluhan nasabah melalui layanan telepon 24 (dua puluh empat) jam dan melakukan monitoring atas keluhan nasabah serta tindak lanjutnya. Dalam rangka pengendalian risiko reputasi, Bank melakukan beberapa hal di antaranya:

1. Tersedianya ketentuan penanganan pengaduan nasabah yang secara jelas mengatur kebijakan, prosedur, unit kerja yang melakukan pemantauan dan pelaporan seputar penanganan pengaduan nasabah; dan
2. Pemantauan terhadap jumlah dan penyelesaian pengaduan nasabah serta pemberitaan negatif tentang Bank Victoria.

Policies and Mechanism in the Framework of Increasing Service Quality to Customers and Other Stakeholders to Control Reputation Risk

The Bank has established a contact center service that specifically handles customer complaints through 24 (twenty four) hour telephone service and monitors customer complaints and their follow-up. In order to control reputation risk, the Bank, among others, conducts the following matters:

1. The availability of provisions for handling customer complaints that clearly regulate policies, procedures, work units that monitor and report on the handling of customer complaints; and
2. Monitoring the number and settlement of customer complaints as well as negative news about Bank Victoria.

Pengelolaan Risiko Reputasi pada Saat Krisis

1. Pengelolaan krisis komunikasi dikoordinasikan oleh pihak internal dan eksternal Bank termasuk media massa dengan alur protokol komunikasi dan penanggung jawab komunikasi; dan

2. Bank memiliki *business continuity plan* untuk meminimalisasi gangguan usaha Bank dan mempercepat proses pemulihan krisis pada risiko reputasi.

Reputation Risk Management in Times of Crisis

1. The management of communication crisis coordinated by the Bank's internal and external parties, including mass media under the flow of communication protocol and the person in charge of communication; and
2. The Bank has a business continuity plan to minimize the Bank's business disruption and accelerate crisis recovery process of reputation risk.

Risiko Stratejik

Risiko stratejik adalah risiko akibat ketidaktepatan dalam pengambilan dan/atau pelaksanaan suatu keputusan strategis, serta kegagalan dalam mengantisipasi perubahan lingkungan bisnis. Ketidakmampuan Bank dalam melakukan penyusunan strategi yang tepat dapat menimbulkan kegagalan bisnis Bank di masa yang akan datang. Risiko ini juga mencakup kemampuan Bank dalam mengembangkan daya saing dan menciptakan keunggulan kompetitif Bank di tengah kompetisi perbankan yang semakin ketat.

Tujuan utama manajemen risiko untuk risiko stratejik adalah memastikan bahwa proses manajemen risiko dapat meminimalkan kemungkinan dampak negatif dari ketidaktepatan pengambilan keputusan stratejik dan kegagalan dalam mengantisipasi perubahan lingkungan bisnis. Bank menetapkan dan mencapai tujuan strategis untuk memberikan hasil yang optimal bagi pemangku kepentingan dengan tetap menjaga keseimbangan antara risiko dan keuntungan, sejalan dengan perubahan kondisi makroekonomi dan kebutuhan nasabah.

Bank selalu mengevaluasi kinerja bisnis dari waktu ke waktu yang disesuaikan dengan perubahan internal maupun eksternal Bank guna memperkecil risiko stratejik Bank.

Struktur Organisasi Manajemen Risiko Stratejik

Pengelolaan risiko stratejik melibatkan berbagai pihak dalam Bank melalui penerapan 3 (tiga) lini pertahanan (*three lines of defense*) yang berfungsi sebagai berikut:

1. Lini Pertahanan Pertama merupakan Direksi, *Senior Executive Vice President*, dan Unit Bisnis;
2. Lini Pertahanan Kedua, terdiri dari Divisi *Corporate Secretary*, Divisi *Accounting*, dan Divisi *Risk Management/Integrated*; dan

3. Lini Pertahanan Ketiga adalah Divisi SKAI. Bank memiliki sistem pengendalian internal untuk manajemen risiko stratejik, mencakup pengawasan secara berkala atas kinerja Bank yang berdampak pada pendapatan usaha dan budaya pengendalian risiko stratejik yang melibatkan seluruh lini bisnis Bank.

Strategic Risk

Strategic Risk is a risk as a result of incorrectness in making and/or implementing a strategic decision, as well as failure in anticipating changes in the business environment. The Bank's inability to formulate appropriate strategies may result in the failure of the Bank's business in the future. This risk also includes the Bank's ability to develop competitiveness and create a competitive advantage in the midst of the increasingly tight banking competition.

The main objective of risk management for strategic risk is to ensure that the risk management process can minimize the potential negative impact of inaccuracy of strategic decision making and failure in anticipating changes in the business environment. The Bank sets and achieves strategic objectives to provide optimal results for stakeholders while maintaining a balance between risk and profit, in line with changes in macroeconomic conditions and customer needs.

The Bank always evaluates the business performance from time to time in accordance with the Bank's internal and external changes to minimize the Bank's strategic risks.

Organizational Structure of Strategic Risk Management

Strategic management involves various parties within the Bank through the implementation of three lines of defense which function as follows:

1. The First Line of Defense is the Board of Directors, Senior Executive Vice President, and Business Units;
2. The Second Line of Defense, consists of the Corporate Secretary Division, Accounting Division, and Risk Management/Integrated Division; and
3. The Third Line of Defense is SKAI Division. The Bank has an internal control system for strategic risk management, which includes regular monitoring of the Bank's performance that have an impact on business revenues, and a strategic risk control culture that involves all of the Bank's business lines.

Kebijakan Bank dalam Mengidentifikasi dan Merespons Perubahan Lingkungan Bisnis, baik Eksternal maupun Internal

Penyusunan strategi Bank dituangkan dalam rencana bisnis Bank melalui serangkaian diskusi yang melibatkan jajaran manajemen. Kebijakan umum atau arahan strategis yang dirumuskan Bank adaptif terhadap perubahan lingkungan, baik internal maupun eksternal dan dilakukan dalam perspektif jangka pendek maupun jangka menengah, yang dikaji ulang secara berkala minimal setahun sekali.

Bank selalu mengevaluasi kinerja bisnis dari waktu ke waktu yang disesuaikan dengan perubahan internal maupun eksternal Bank guna memperkecil risiko stratejik Bank, seperti melakukan langkah strategis di tengah ketidakpastian ekonomi dengan mempertimbangkan dan menyesuaikan beberapa aktivitas yang dilakukan secara manual atau konvensional ke dalam proses digitalisasi.

Mekanisme untuk Mengukur Kemajuan yang Dicapai dari Rencana Bisnis yang Ditetapkan

Pemantauan dan evaluasi atas pencapaian kinerja keuangan Bank terhadap target yang telah disusun mendapatkan perhatian penuh dari manajemen Bank, yang secara khusus menjadi pembahasan dalam rapat Direksi secara rutin setiap bulan atau antara Dewan Komisaris dengan Direksi.

Risiko Kepatuhan

Risiko kepatuhan adalah risiko akibat Bank tidak mematuhi dan/atau tidak melaksanakan peraturan perundang-undangan dan ketentuan yang berlaku. Kegagalan dalam mengelola risiko kepatuhan tersebut dapat menyebabkan Bank terkena sanksi dan denda dari regulator serta berdampak terhadap kelangsungan usaha Bank, sehingga dapat memengaruhi tata kelola Bank.

Risiko kepatuhan dapat bersumber dari perilaku hukum, yaitu perilaku atau aktivitas Bank yang menyimpang atau melanggar dari ketentuan dan/atau peraturan perundang-undangan. Sedangkan perilaku organisasi, yaitu perilaku atau aktivitas Bank yang menyimpang atau bertentangan dari standar yang berlaku secara umum.

Tujuan utama manajemen risiko untuk risiko kepatuhan adalah untuk memastikan bahwa proses manajemen risiko dapat meminimalkan kemungkinan dampak negatif yang menyimpang atau melanggar standar dan/atau peraturan dan perundang-undangan yang berlaku.

Struktur Organisasi Manajemen Risiko Kepatuhan

Pengelolaan risiko kepatuhan melibatkan berbagai pihak dalam Bank melalui penerapan 3 (tiga) lini pertahanan (*three lines of defense*) yang berfungsi sebagai berikut:

1. Lini Pertahanan Pertama merupakan *Risk Taking Unit* atau unit bisnis dan/atau fungsi pendukung yang bergerak atau mendukung aktivitas penghasil pendapatan yang memiliki dan mengelola risiko;

Bank Policies to Identify and Respond to Changes in Business Environment, External and Internal

The formulation of the Bank's strategy is set forth in the Bank's business plan through a series of discussions involving management ranks. The general policies or strategic directions formulated by the Bank are made adaptive to internal and external environment changes and carried out in a short-term and medium-term perspective, reviewed periodically at least once a year.

The Bank always evaluates the business performance from time to time in accordance with the Bank's internal and external changes to minimize the Bank's strategic risks, such as taking strategic steps in the midst of economic uncertainty by considering and adjusting several activities carried out manually or conventionally to the digitalization process.

Mechanism to Measure Progress Achieved from the Defined Business Plan

Monitoring and evaluation of the Bank's financial performance achievement against the targets set have received the Bank's management full attention, which is specifically discussed in the Board of Directors' meetings regularly on a monthly basis or between the Board of Commissioners and the Board o Directors.

Compliance Risk

Compliance risk is a risk due to the Bank's failure to comply with and/or enforce the applicable laws and regulations. Failure to manage compliance risk may cause the Bank to be subject to sanctions and penalties from the regulator, and therefore, affecting the Bank's business continuity and governance.

Compliance risk may arise from legal behavior, which is the Bank's behavior or activity that deviates from or violates the provisions and/or laws and regulations. Whereas, organizational behavior is the Bank's behavior or activity that deviates from or in contrary to the generally accepted standards.

The main objective of risk management for compliance risk is to ensure that the risk management process can minimize the possibility of negative impacts that deviates or violates the generally accepted standards and/or laws and regulations.

Organizational Structure of Compliance Risk Management

Compliance management involves various parties within the Bank through the implementation of three lines of defense which function as follows:

1. The First Line of Defense is Risk Taking Unit or business unit and/or supporting function that operates or supports income-generating activities that own and manage risk;

2. Lini Pertahanan Kedua terdiri dari Divisi *Compliance, System Procedure & Customer Protection*; Unit AML, CTF & WMD; dan Divisi *Risk Management/Integrated*; dan
3. Lini Pertahanan Ketiga adalah Divisi SKAI.

Penerapan manajemen risiko kepatuhan melibatkan berbagai pihak dalam Bank. Organisasi manajemen risiko kepatuhan melibatkan pengawasan aktif Dewan Komisaris dan Direksi yang berperan mengawasi kebijakan dan pelaksanaan fungsi kepatuhan dalam pengelolaan risiko kepatuhan serta mewujudkan terlaksananya budaya kepatuhan pada semua tingkatan organisasi dan kegiatan usaha Bank. Untuk mendukung pelaksanaan fungsi risiko kepatuhan tersebut, Bank membentuk Komite Implementasi dan Pemantauan GCG.

Strategi Manajemen Risiko dan Efektivitas Penerapan Manajemen Risiko Kepatuhan

Penerapan manajemen risiko kepatuhan disesuaikan dengan ukuran dan kompleksitas usaha Bank tidak terlepas dari pengawasan aktif Dewan Komisaris dan Direksi dalam merumuskan strategi dengan memperhatikan tingkat risiko yang akan diambil dan risiko toleransi guna mendorong terciptanya budaya kepatuhan, menetapkan sistem dan prosedur yang akan digunakan untuk penyusunan ketentuan dan pedoman internal Bank, serta melakukan tindakan pencegahan agar kebijakan dan/atau keputusan tidak menyimpang dari ketentuan dan perundang-undangan yang berlaku.

Adapun strategi yang diterapkan Bank dalam penerapan manajemen risiko kepatuhan, di antaranya sebagai berikut:

1. Arahan dari Top Manajemen, Direksi yang dikoordinasikan oleh kepatuhan mengembangkan dan mengimplementasikan budaya kepatuhan di dalam organisasi. Kepatuhan merupakan bagian dari *Key Performance Indicator* Bank dan disosialisasikan melalui pesan Direktur, pelatihan Bank, dan berbagai pendekatan lainnya;
2. Menetapkan program Kode Etik dan kepatuhan, di mana Dewan dan Manajemen Senior, dan semua staf berbagi rasa tanggung jawab untuk melindungi aset reputasi dan keuangan Bank melalui budaya perilaku etis dan kepatuhan terhadap peraturan internal dan eksternal;
3. Membangun Budaya Perusahaan yang berintegritas, yang diturunkan dari atas ke bawah. Budaya integritas adalah inti dari program etika dan kepatuhan yang efektif;
4. Penilaian risiko terhadap risiko yang signifikan dan risiko konsentrasi tertinggi dalam organisasi, dan memberikan tindakan dasar yang diperlukan untuk menghindari, memitigasi, atau memulihkan risiko tersebut;
5. Program pengujian dan pemantauan yang kuat untuk membantu memastikan lingkungan pengendalian efektif; dan
6. Tindakan penegakan hukum seperti pemantauan berkelanjutan terhadap kewajiban peraturan.

2. The Second Line of Defense consists of the Compliance, System Procedure & Customer Protection Division; Unit AML, CTF & WMD; and Risk Management/Integrated Division; and
3. The Third Line of Defense is SKAI Division.

The implementation of compliance risk management involves various parties within the Bank. The compliance risk management organization involves active supervision of the Board of Commissioners and the Board of Directors whose role is to oversee the policy and implementation of compliance function in managing compliance risk and realizing the implementation of a compliance culture at all levels of the organization and the Bank's business activities. To support the implementation of compliance risk function, the Bank established GCG Implementation and Monitoring Committee.

Risk Management Strategy and Effectiveness of Compliance Risk Management Implementation

The implementation of compliance risk management is adjusted to the Bank's business size and complexity, which is inseparable from the active supervision of the Board of Commissioners and Board of Directors in formulating strategies by considering the risk appetite and risk tolerance in order to promote the creation of a compliance culture, to establish system and procedure that will be used for the preparation of the Bank's internal provisions and guidelines, and to take preventive actions so that the policies and/or decisions do not deviate from the applicable provisions, laws and regulations.

Strategies implemented by the Bank in implementing compliance risk management include the following:

1. Direction from the Top Management, Board of Directors coordinated by compliance to develop and implement a culture of compliance within the organization. Compliance is part of the Bank's Key Performance Indicators and is disseminated through Board of Directors' messages, the Bank's training, and other approaches;
2. Establishing Code of Conduct and compliance program, in which the Board and Senior Management, and all staff share a sense of responsibility to protect the Bank's reputation and financial assets through a culture of ethical behavior and compliance with internal and external regulations;
3. Establishing a Company Culture with integrity, which is passed down from the top to the bottom. A culture of integrity is at the heart of an effective ethics and compliance program;
4. Risk assessment of significant risks and highest concentration risks within the organization, and providing basic actions required to avoid, mitigate, or remediate such risks;
5. A robust testing and monitoring program to help ensure an effective control environment; and
6. Enforcement actions such as ongoing monitoring of regulatory obligations.

Pemantauan dan Pengendalian Risiko Kepatuhan

Pemantauan dan pengendalian yang dilakukan dalam manajemen risiko kepatuhan antara lain dengan:

1. Melakukan uji kepatuhan untuk memastikan Bank mematuhi ketentuan yang berlaku;
2. Memantau dampak finansial dan non-finansial dari ketidakpatuhan Bank terhadap regulasi secara berkala;
3. Melakukan pemantauan Kepatuhan Bulanan *Key Risk Indicator* (KRI);
4. Mewujudkan terlaksananya budaya kepatuhan pada seluruh kegiatan usaha Bank di setiap jenjang organisasi, antara lain melalui pelaksanaan sosialisasi dan pelatihan atas ketentuan dan aturan yang berlaku, serta memberikan masukan dan saran kepada unit-unit lain untuk memastikan kepatuhan Bank;
5. Memberikan nasihat kepatuhan untuk direkomendasikan/ dilaksanakan kepada unit kerja terkait, sehubungan dengan masalah kepatuhan dan AML, penilaian kepatuhan atas tinjauan fasilitas kredit, serta penilaian atas permasalahan kepatuhan dalam kebijakan internal/prosedur/produk/aksi korporasi;
6. Menilai dan mengevaluasi kecukupan, dan kesesuaian kebijakan, ketentuan, sistem, maupun prosedur yang dimiliki oleh Bank dengan ketentuan dan peraturan yang berlaku;
7. Memantau atas pelaksanaan prinsip kehati-hatian Bank;
8. Mengelola risiko kepatuhan, selain dilakukan melalui uji kepatuhan, juga dilakukan melalui pemantauan terhadap pemenuhan komitmen Bank kepada regulator, baik berdasarkan hasil pemeriksaan regulator maupun melalui korespondensi antara Bank dengan regulator; dan
9. Penerapan Anti-Pencucian Uang dan Pencegahan Pendanaan Terorisme di perbankan yang terdiri dari 5 (lima) prinsip utama, yaitu:
   a. Pengawasan aktif Dewan Komisaris dan Direksi;
   b. Kebijakan dan prosedur;
   c. Pengendalian internal;
   d. Sistem informasi manajemen; dan
   e. Sumber daya manusia dan pelatihan.

Monitoring and Controlling Compliance Risk

Monitoring and control carried out in compliance risk management include:

1. Carrying out compliance test to ensure that the Bank complies with the applicable regulations;
2. Monitoring financial and non-financial impacts of the Bank's non-compliance with regulations on a regular basis;
3. Monitoring Monthly Key Risk Indicator (KRI) Compliance;
4. Achieving the implementation of compliance culture at all of the Bank's business activities at every organizational level, through dissemination and training on the prevailing rules and regulations, and providing input and advice to other units to ensure the Bank's compliance;
5. Providing compliance advice to be recommended/implemented to related units, in connection with compliance and AML issues, compliance assessment of credit facility reviews, as well as assessment of compliance issues in internal policies/ procedures/products/corporate actions;
6. Assessing and evaluating the adequacy and conformity of the Bank's policies, regulations, systems, and procedures against the applicable provisions and regulations;
7. Monitoring the implementation of the Bank's prudential principles;
8. Managing compliance risk, in addition to conducting compliance tests, is also conducted through monitoring on the Bank's commitment to the regulator, either based on regulatory examination results or through correspondence between the Bank and the regulator; and
9. Implementing Anti-Money Laundering and Counter-Terrorism Funding in banking consisting of 5 (five) main principles, which are:
   a. Active monitoring of the Board of Commissioners and Board of Directors;
   b. Policies and procedures;
   c. Internal control;
   d. Management information system; and
   e. Human resources and training.

Risiko Terkait Iklim

Perkembangan ekonomi global yang pesat serta meningkatnya kesadaran terhadap isu perubahan iklim telah membawa dampak signifikan pada industri perbankan. Bank Victoria menghadapi sejumlah risiko terkait iklim yang dapat memengaruhi stabilitas keuangan, reputasi, dan kontribusi terhadap perekonomian. Pemerintah berkomitmen untuk menurunkan emisi gas rumah kaca (GRK) melalui berbagai kebijakan yang diharapkan berdampak material terhadap penurunan emisi karbon. Kebijakan ini akan berpengaruh terhadap pinjaman dan investasi yang belum memenuhi kualifikasi *nett zero emission* (NZE), khususnya dalam portofolio keuangan Bank yang terkait dengan industri penghasil emisi tinggi.

Sebagai langkah awal dalam mendukung dekarbonisasi, Bank perlu mengukur emisi karbon yang terkait dengan portofolio aset keuangannya. Integrasi risiko iklim ke dalam tata kelola, strategi bisnis, dan kerangka kerja manajemen risiko menjadi krusial dalam penerapan prinsip kehati-hatian dan transisi yang adil (*just and fair transition for all)* menuju NZE tahun 2050 atau lebih awal.

Climate-Related Risks

The rapid development of global economy and the increasing awareness of climate change issues have had a significant impact on banking industry. Bank Victoria faces a number of climate-related risks that can affect its financial stability, reputation, and contribution to the economy. The government is committed to reducing greenhouse gas (GHG) emissions through various policies expected to have material impacts on reducing carbon emissions. This policy will affect loans and investments that do not yet meet the net zero emission (NZE) qualifications, particularly in the Bank's financial portfolio related to high-emission industries.

As the first step in supporting decarbonization, the Bank needs to measure carbon emissions associated with its financial asset portfolio. Integrating climate risk into governance, business strategy, and risk management frameworks is crucial to implementing prudential principle and a just and fair transition for all towards NZE by 2050 or earlier.

Untuk menghadapi risiko iklim, Bank mengadopsi berbagai strategi, antara lain mengimplementasikan keuangan berkelanjutan dalam portofolio bisnisnya, melakukan evaluasi risiko iklim secara terpadu untuk memahami dampak potensialnya, dan menerapkan skenario *stress test* risiko iklim guna mengukur ketahanan terhadap perubahan lingkungan. Selain itu, Bank mendukung proyek-proyek hijau dan investasi teknologi yang berkontribusi pada mitigasi perubahan iklim.

Bank perlu melakukan mitigasi terhadap risiko iklim yang dapat berdampak pada sektor perbankan. Risiko tersebut terbagi menjadi 2 (dua) kategori utama, yaitu:

1. Risiko transisi, merupakan risiko yang timbul akibat perubahan kebijakan pemerintah, kemajuan teknologi, serta dinamika sosial menuju ekonomi rendah karbon, Bank harus menyesuaikan arah kebijakan bisnisnya, yang dapat berdampak pada profitabilitas, reputasi, dan nilai aset.
2. Risiko fisik, dapat digolongkan menjadi 2 (dua), yaitu risiko akibat perubahan pola iklim dalam jangka panjang, seperti kenaikan suhu global, perubahan pola curah hujan, dan kenaikan permukaan laut.

Secara umum, dampak perubahan iklim terhadap risiko perbankan sebagai berikut:

1. Risiko kredit, dapat berdampak pada kesehatan keuangan debitur, yang berpotensi menurunkan kemampuan mereka dalam memenuhi kewajiban kredit.
   Dalam menghitung *Expected Credit Loss* (ECL), Bank perlu menyesuaikan indikator risiko kredit seperti *Probability of Default* (PD), *Loss Given Default* (LGD), dan *Exposure at Default* (EAD). Penyesuaian ini dilakukan dengan mempertimbangkan jangka waktu yang sesuai dengan dampak risiko iklim baik jangka pendek maupun jangka panjang. Risiko iklim juga dapat meningkatkan CKPN atas portofolio Bank, sehingga perlu dilakukan penyesuaian dalam perhitungan CKPN.
2. Risiko pasar, ketidakpastian terhadap kondisi masa depan, termasuk perubahan cuaca ekstrem, bencana alam, fluktuasi ekonomi yang dapat menyebabkan perubahan kebijakan regulasi, sentimen investor, serta perkembangan teknologi baru. Hal ini dapat meningkatkan volatilitas pasar keuangan, sehingga berdampak pada penurunan peringkat kredit, devaluasi aset, serta efektivitas transaksi lindung nilai (*hedging*) terhadap aset yang dimiliki Bank.
3. Risiko likuiditas, dalam menghadapi risiko terkait iklim, Bank dapat berdampak pada stabilitas pendanaan Bank, termasuk arus dana keluar yang lebih besar serta potensi meningkatnya biaya pendanaan. Bank perlu memastikan kecukupan penyangga likuiditas (*buffer liquidity*) untuk mengantisipasi perubahan lingkungan bisnis akibat dampak iklim.
4. Risiko operasional, sehubungan dengan risiko terkait iklim, Bank harus memastikan bahwa kegiatan operasionalnya mampu beradaptasi terhadap risiko iklim, terutama dalam menghadapi potensi gangguan akibat perubahan lingkungan. Kemampuan Bank untuk pulih dengan cepat (*resilience*) setelah terjadi gangguan iklim sangat penting guna menjaga kelangsungan operasional.

To address climate risk, the Bank adopts various strategies, including implementing sustainable finance in its business portfolio, conducting integrated climate risk assessment to understand its potential impacts, and implementing climate risk stress test scenarios to measure the resilience to environmental changes. In addition, the Bank supports the green projects and technology investments that contribute to mitigate climate change.

The Bank needs to mitigate climate risks that can impact banking sector. These risks are divided into 2 (two) main categories, namely:

1. Transition risk, is the risk that arises due to changes in government policy, technological advances, and social dynamics towards a low-carbon economy. The Bank has to adjust the direction of its business policies, which can impact its profitability, reputation, and asset value.
2. Physical risk, can be classified into 2 (two), namely risk due to changes in long-term climate patterns, such as rising global temperatures, changes in rainfall patterns, and rising sea levels.

In general, the impact of climate change on banking risk is as follows:

1. Credit risk, can impact the financial health of debtors, which has the potential to reduce their ability to meet credit obligations.

   In calculating Expected Credit Loss (ECL), the Bank needs to adjust credit risk indicators such as Probability of Default (PD), Loss Given Default (LGD), and Exposure at Default (EAD). This adjustment is made by considering the time period according to the impact of both short-term and long-term climate risks. Climate risk can also increase Allowance for Impairment Loss (CKPN) on the Bank's portfolio, and thus, adjustments need to be made in calculating CKPN.
2. Market risk, uncertainty about future conditions, including extreme weather changes, natural disasters, economic fluctuations that may cause changes in regulatory policies, investor sentiment, and new technology development. These matters can increase financial market volatility, resulting in a decrease in credit rating, asset devaluation, and the effectiveness of hedging transactions on assets owned by the Bank.
3. Liquidity risk, in dealing with climate-related risks, can have an impact on the stability of the Bank's funding, including greater outflow of funds and the potential for increased funding costs. The Bank needs to ensure adequate liquidity buffers to anticipate changes in the business environment due to climate impacts.
4. Operational risk, in relation to climate-related risks, the Bank must ensure that its operational activities are able to adapt to climate risk, particularly in dealing with potential disruptions due to environmental changes. The Bank's resilience after a climate disruption is very important to maintain its operational sustainability.

Stress Test Risiko Iklim

Stress test atau *scenario analysis* yang dilakukan Bank Victoria terhadap risiko iklim merupakan tinjauan komprehensif mengenai bagaimana Bank mengintegrasikan risiko perubahan iklim ke dalam strategi, tata kelola, dan kerangka kerja manajemen risiko. Secara umum, hasil *stress testing* memberikan gambaran sejauh mana Bank telah memiliki kebijakan, strategi, dan mitigasi risiko yang diperlukan untuk menghadapi dampak perubahan iklim.

Salah satu faktor utama dalam *stress test* atau *scenario analysis* adalah ketersediaan dan akurasi data emisi GRK. Data ini sangat penting sebagai input utama dalam analisis skenario, khususnya dalam pengelolaan risiko transisi. Melalui pemantauan emisi usaha yang dibiayai, baik dari kredit, pinjaman, maupun investasi, Bank dapat:

1. Mengidentifikasi dan mengelola risiko iklim yang mungkin timbul akibat perubahan regulasi, teknologi, dan sentimen pasar.
2. Menentukan arah pengurangan emisi karbon dalam portofolio keuangan Bank guna mendukung target *Net Zero Emission* (NZE).
3. Mengintegrasikan dampak perubahan iklim ke dalam pengelolaan risiko, guna memastikan ketahanan bisnis Bank dalam menghadapi tantangan lingkungan dan regulasi di masa depan.

Climate Risk Stress Test

The stress test or scenario analysis conducted by Bank Victoria on climate risk is a comprehensive review of how the Bank integrates climate change risk into its strategy, governance, and risk management framework. In general, the results of stress testing provide an overview of the extent to which the Bank has the policies, strategies, and risk mitigation required to deal with the impacts of climate change.

One main factor in stress test or scenario analysis is the availability and accuracy of GHG emission data. This data is very important as the main input in scenario analysis, particularly in managing transition risks. By monitoring the emissions of financed businesses, including from credit, loans, and investments, the Bank can do the following matters:

1. Identify and manage climate risks that may arise due to changes in regulation, technology, and market sentiment.
2. Determine the direction of carbon emission reduction in the Bank's financial portfolio to support the Net Zero Emission (NZE) target.
3. Integrate the impact of climate change into risk management, to ensure the Bank's business resilience in facing future environmental and regulatory challenges.

Evaluasi Terhadap Efektivitas Manajemen Risiko

Divisi *Risk Management/Integrated* bersama Divisi/Unit terkait secara berkala mengevaluasi implementasi sistem manajemen risiko. Evaluasi ini bertujuan untuk mengidentifikasi setiap potensi kelemahan dalam pelaksanaan pengendalian internal. Dengan demikian, Bank dapat secara proaktif mengambil langkah-langkah yang tepat untuk memperkuat strategi pengelolaan risiko, selaras dengan perkembangan dan dinamika terbaru Bank. Proses evaluasi sistem manajemen risiko memastikan bahwa Bank selalu berada di jalur yang tepat dalam menghadapi berbagai tantangan dan risiko yang ada, sekaligus meningkatkan ketahanan operasional di lingkungan bisnis yang terus berubah.

Evaluation of Risk Management Effectiveness

The Risk Management/Integrated Division, together with related Divisions/Units, periodically evaluates the implementation of risk management system. This evaluation aims to identify any potential weaknesses in the implementation of internal control. Therefore, the Bank can proactively take appropriate steps to strengthen the risk management strategy, in line with the latest developments and dynamics of the Bank. The risk management system evaluation process ensures that the Bank is always on the right track in facing various challenges and risks that exist, while increasing its operational resilience in the ever-changing business environment.

Pernyataan Dewan Komisaris dan Direksi Atas Kecukupan Manajemen Risiko

Berdasarkan hasil evaluasi yang dilakukan tahun 2024, Dewan Komisaris dan Direksi menilai bahwa penerapan sistem manajemen risiko telah berjalan baik dan efektif. Kinerja positif tersebut ditunjukkan dengan kemampuan penyelesaian berbagai risiko yang dihadapi Bank melalui ketepatan prosedur dan langkah mitigasinya, tanpa menimbulkan dampak negatif lainnya.

Statement of the Board of Commissioners and Board of Directors on the Adequacy of Risk Management

Based on the evaluation results conducted in 2024, the Board of Commissioners and Board of Directors considered that the risk management system implementation ran properly and effectively. Such positive performance is demonstrated by the Bank's ability to resolve various risks faced by the Bank through the accuracy of its procedures and mitigation steps, without causing other negative impacts.

Manajemen Risiko Grup Keuangan Victoria

Victoria Financial Group Risk Management

Industri lembaga jasa keuangan memiliki sistem yang kompleks, dinamis, dan saling terkait antar sektor, yang meningkatkan eksposur terhadap berbagai risiko. Untuk menghadapi tantangan ini, Grup Keuangan Victoria menerapkan manajemen risiko yang komprehensif dan terintegrasi, memastikan seluruh sektor jasa keuangan dikelola dengan cermat. Sebagai Entitas Koordinator, Bank Victoria berperan penting dalam menilai dan mengawasi proses manajemen risiko di seluruh anggota Grup Keuangan Victoria, dengan mempertimbangkan karakteristik bisnis unik dari masing-masing lembaga jasa keuangan, sehingga mampu merespons risiko secara efektif sesuai kebutuhan.

Financial services institution industry has a complex, dynamic, and interconnected system between sectors, which increases exposure to various risks. To face this challenge, Victoria Financial Group implements a comprehensive and integrated risk management, ensuring that all financial services sectors are managed carefully. As a Coordinating Entity, Bank Victoria plays an important role in assessing and supervising the risk management process across all members of Victoria Financial Group, by considering the unique business characteristics of each financial services institution, enabling it to respond effectively to risks as required.

Dasar Penerapan Manajemen Risiko pada Grup Keuangan Victoria

Dasar penerapan Manajemen Risiko pada Grup Keuangan Victoria mengacu pada Surat Otoritas Jasa Keuangan No.S-66/ PB.33/2021 tanggal 23 Juni 2021 tentang Perubahan Status Konglomerasi Keuangan Grup Victoria menjadi Grup Keuangan Victoria beserta lampirannya, dan tidak bertentangan dengan ketentuan Peraturan Otoritas Jasa Keuangan terkait Konglomerasi Keuangan dan Kewajiban Penyediaan Modal Minimum Terintegrasi bagi Konglomerasi Keuangan sepanjang dinyatakan tetap berlaku, seperti:

1. Peraturan Otoritas Jasa Keuangan No. 17/POJK.03/2014 tanggal 18 November 2014 tentang Penerapan Manajemen Risiko Terintegrasi bagi Konglomerasi Keuangan;
2. Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2014 tanggal 18 November 2014 tentang Penerapan Tata Kelola Terintegrasi bagi Konglomerasi Keuangan; dan
3. Peraturan Otoritas Jasa Keuangan No. 26/POJK.03/2015 tanggal 11 Desember 2015 tentang Kewajiban Penyediaan Modal Minimum Terintegrasi bagi Konglomerasi Keuangan.

Basis of Risk Management Implementation in Victoria Financial Group

The basis for implementing Risk Management in Victoria Financial Group refers to the Financial Services Authority Letter No. S-66/PB.33/2021 dated 23 June 2021 on Changes in Status of Victoria Group Financial Conglomeration to Victoria Financial Group and its attachments, this does not conflict with the provisions of Financial Services Authority Regulations regarding Financial Conglomeration and Integrated Minimum Capital Adequacy Requirement for Financial Conglomeration, as long as it remains valid, among others:

1. Financial Services Authority Regulation No. 17/POJK.03/2014 dated 18 November 2014, on Implementation of Integrated Risk Management for Financial Conglomeration;
2. Financial Services Authority Regulation No. 18/POJK.03/2014 dated 18 November 2014 on Implementation of Integrated Governance for Financial Conglomeration; and
3. Financial Services Authority Regulation No. 26/POJK.03/2015 dated 11 December 2015 on Integrated Minimum Capital Adequacy Requirement for Financial Conglomeration.

Anggota Grup Keuangan Victoria

Lembaga jasa keuangan yang tergabung dalam Grup Keuangan Victoria pada tahun 2024 terdiri dari:

1. PT Bank Victoria International Tbk (Entitas Koordinator);
2. PT Bank Victoria Syariah;
3. PT Victoria Manajemen Investasi;
4. PT Victoria Sekuritas Indonesia;
5. PT Victoria Insurance Tbk; dan
6. PT Victoria Alife Indonesia.

Members of Victoria Financial Group

The financial services institutions that are members of the Victoria Financial Group in 2024 consist of:

1. PT Bank Victoria International Tbk (Coordinating Entity);
2. PT Bank Victoria Syariah;
3. PT Victoria Manajemen Investasi;
4. PT Victoria Sekuritas Indonesia;
5. PT Victoria Insurance Tbk; and
6. PT Victoria Alife Indonesia.

Berdasarkan Surat Otoritas Jasa Keuangan No. S-66/PB.33/2021 tanggal 23 Juni 2021 perihal Perubahan Status Konglomerasi Keuangan Grup Victoria menjadi Grup Keuangan Victoria, Bank ditunjuk sebagai Entitas Koordinator dalam Grup Keuangan Victoria. Oleh karenanya, Bank selaku Entitas Koordinator membentuk organisasi manajemen risiko secara terintegrasi dalam Grup Keuangan Victoria yang terdiri dari Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan Victoria dan Satuan Kerja Manajemen Risiko Terintegrasi.

Satuan Kerja Manajemen Risiko Terintegrasi melakukan pemantauan eksposur risiko pada anggota Grup Keuangan Victoria serta memberikan informasi kepada Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan Victoria akan hal-hal yang perlu ditindaklanjuti terkait hasil evaluasi dari pemantauan terhadap penerapan manajemen risiko secara terintegrasi.

Penerapan manajemen risiko pada Grup Keuangan Victoria secara terintegrasi dilakukan melalui pendekatan berdasarkan risiko dengan prinsip-prinsip:

1. Agregasi Risiko
   Penilaian risiko didasarkan pada risiko yang terdapat dalam Grup Keuangan Victoria secara menyeluruh dengan memperhatikan dampak yang ditimbulkan terhadap kondisi Grup Keuangan Victoria.
2. Holistik
   Penilaian risiko dilakukan dengan melihat keterkaitan antara satu faktor dengan faktor lainnya, sehingga diperoleh kesimpulan yang memberikan gambaran mengenai risiko Grup Keuangan Victoria secara keseluruhan.
3. Signifikansi/Materialitas dan Proporsionalitas
   Penilaian risiko dilakukan dengan memperhatikan signifikansi/materialitas risiko secara proporsional pada Grup Keuangan Victoria secara keseluruhan dengan memperhatikan struktur, karakteristik, dan kompleksitas dari Grup Keuangan Victoria.
4. Komprehensif dan Terstruktur
   Penilaian risiko dilakukan dengan analisis mendalam dengan memperhatikan faktor-faktor penilaian secara luas, lengkap, dan utuh.

Pilar Penerapan Manajemen Risiko Grup Keuangan Victoria secara Terintegrasi

Pengawasan Dewan Komisaris dan Direksi Entitas Koordinator

Dewan Komisaris dan Direksi Entitas Koordinator memastikan atas efektivitas penerapan Manajemen Risiko dalam Grup Keuangan Victoria.

Selain melaksanakan wewenang dan tanggung jawab dalam rangka penerapan manajemen risiko Grup Keuangan Victoria, Dewan Komisaris dan Direksi Entitas Koordinator juga tetap melaksanakan wewenang dan tanggung jawabnya dalam rangka penerapan manajemen risiko pada Entitas Koordinator, sesuai dengan ketentuan yang berlaku bagi Entitas Koordinator.

Pursuant to the Financial Services Authority Letter No. S-66/PB.33/2021 dated 23 June 2021 on Changes in Status of Victoria Group Financial Conglomeration to Victoria Financial Group, the Bank was appointed as the Coordinating Entity in Victoria Financial Group. Therefore, the Bank as the Coordinating Entity established an integrated risk management organization in Victoria Financial Group, consisting of Integrated Risk Management Committee in Victoria Financial Group and Integrated Risk Management Unit.

The Integrated Risk Management Unit is tasked with monitoring risk exposure of Victoria Financial Group members and providing information to the Integrated Risk Management Committee within Victoria Financial Group on matters requiring follow up on the evaluation results from monitoring integrated risk management implementation.

The integrated risk management in Victoria Financial Group is implemented through a risk-based approach with the following principles:

1. Risk Aggregation
   Comprehensive risk assessment based on risks found in Victoria Financial Group by considering the arising impact on Victoria Financial Group's condition.
2. Holistic
   Risk assessment performed by looking at the link between one factor and another in order to reach a conclusion that gives an overall picture of risks in Victoria Financial Group.
3. Significance/Materiality and Proportionality
   Risk assessment carried out with due regard to the risk significance/materiality in a proportional manner in Victoria Financial Group as a whole, by considering the structure, characteristics, and complexity of Victoria Financial Group.
4. Comprehensive and Structured
   Risk assessment carried out in an in-depth analysis by considering comprehensive, complete, and intact assessment factors.

Pillars of Integrated Risk Management Implementation of Victoria Financial Group

Supervision of the Board of Commissioners and Board of Directors of the Coordinating Entity

The Board of Commissioners and Board of Directors of the Coordinating Entity ensure the effectiveness of Risk Management implementation in Victoria Financial Group.

Apart from exercising authority and responsibilities in order to implement risk management in Victoria Financial Group, the Board of Commissioners and Board of Directors of the Coordinating Entity also exercise their authority and responsibilities in order to implement risk management in the Coordinating Entity, in accordance with the provisions applicable to the Coordinating Entity.

Kecukupan Kebijakan, Prosedur, dan Penetapan Limit

Kebijakan manajemen risiko Grup Keuangan Victoria merupakan arahan tertulis dalam menerapkan manajemen risiko sesuai dengan karakteristik dan kompleksitas kegiatan dan praktik usaha yang sehat. Dalam mendukung efektivitas penerapan manajemen risiko Grup Keuangan Victoria secara terintegrasi, di mana dalam pelaksanaannya telah dilengkapi dengan Kebijakan Manajemen Risiko Grup Keuangan Victoria yang disesuaikan dengan strategi manajemen risiko dengan memperhatikan tingkat risiko yang akan diambil (*risk appetite*) dan toleransi risiko (*risk tolerance*) atau limit sesuai karakteristik dan kompleksitas usaha Grup Keuangan Victoria.

Kecukupan Proses Identifikasi, Pengukuran, Pemantauan dan Pengendalian, serta Sistem Informasi Manajemen Risiko

Secara berkesinambungan, Grup Keuangan Victoria terus menyempurnakan proses manajemen risiko secara komprehensif. Hal tersebut bertujuan agar informasi yang berpotensi merugikan secara terintegrasi dalam Grup Keuangan Victoria dapat diketahui sedini mungkin, sehingga dapat mengambil tindakan yang memadai untuk memitigasi dampak risiko seminimal mungkin.

Proses identifikasi risiko dilakukan secara proaktif, termasuk dampak yang ditimbulkan. Selanjutnya, dilakukan pengukuran, pemantauan, dan pengendalian terhadap seluruh aktivitas usaha masing-masing Grup Keuangan Victoria yang didukung oleh sistem informasi manajemen risiko secara memadai.

Pada proses manajemen risiko Grup Keuangan Victoria secara terintegrasi, seluruh lembaga jasa keuangan di dalam Grup Keuangan Victoria saling bersinergi dalam melaksanakan aktivitas bisnis/transaksi dengan tetap mengacu kepada prinsip *arm length* dan pengelolaan yang berbasis risiko.

Sistem Pengendalian Internal Terhadap Penerapan Manajemen Risiko Terintegrasi

Melalui fungsi pengendalian internal, Grup Keuangan Victoria senantiasa melakukan upaya-upaya untuk mengelola dan mengendalikan risiko. Dalam rangka melaksanakan pengendalian risiko, Entitas Koordinator memastikan grup keuangan memiliki metode *risk base approach* untuk mengendalikan risiko atas risiko yang dapat membahayakan kelangsungan usaha grup keuangan.

Secara umum, pengendalian internal terdiri dari serangkaian prosedur atau proses yang memastikan organisasi tetap pada jalurnya untuk mencapai tujuan yang ditetapkan. Adapun proses pengendalian aktivitas operasional masing-masing Grup Keuangan Victoria dilakukan melalui tindakan-tindakan pengendalian pada setiap tindakan dalam struktur organisasi. Hal tersebut bertujuan untuk memastikan:

1. Kepatuhan terhadap kebijakan atau ketentuan internal serta peraturan perundang-undangan yang berlaku;
2. Tersedianya informasi keuangan dan manajemen yang lengkap, akurat, tepat guna, dan tepat waktu; dan
3. Efektivitas budaya risiko *(risk culture)* pada organisasi grup keuangan secara menyeluruh.

Adequacy of Policies, Procedures, and Limit

Establishment The risk management policies of Victoria Financial Group are written direction in implementing risk management in accordance with the characteristics and complexity of activities and sound business practices. In supporting the effectiveness of integrated risk management implementation in Victoria Financial Group, its implementation has been equipped with Victoria Financial Group Risk Management Policies that are adjusted to the risk management strategies by considering the risk appetite and risk tolerance or limits. According to Victoria Financial Group's business characteristics and complexity.

Adequacy of Process of Risk Identification, Measurement, Monitoring and Control, as well as Risk Management Information System

On an ongoing basis, Victoria Financial Group keeps improving its risk management process comprehensively. This is intended so that information on potential harm in an integrated manner within Victoria Financial Group can be detected as early as possible, so that sufficient actions can be taken to mitigate the risk impact to be as minimum as possible.

Risk identification process is performed pro-actively, including all impacts that may be incurred. Thereafter, all business activities of each Victoria Financial Group are measured, monitored, and controlled, with adequate support of risk management information system.

In the integrated risk management process of Victoria Financial Group, all financial services institutions within Victoria Financial Group are in synergy in carrying out business activities/transactions by still referring to the principle of arm length and risk-based management.

Internal Control System on Integrated Risk Management Implementation

Through internal control function, Victoria Financial Group always makes efforts to manage and control the risks. In order to implement risk control, the Coordinating Entity ensures that the financial group has a risk-based approach method to control risks for risks that may endanger the financial group's business continuity.

In general, internal control consists of a set of procedures or processes that ensure the organization stays on track to achieve its stated objectives. The operational activity control process of each member of Victoria Financial Group is carried out through control activities in every action within the organization structure. This is carried out with intention to ensure:

1. Compliance with internal policies and provisions, and the applicable laws and regulations;
2. The availability of financial and management information that is complete, accurate, appropriate, and timely; and
3. The effectiveness of risk culture in the financial group organization in overall.

Penjelasan di atas tertuang dalam Surat Keputusan Direksi No. 003/SK-DIR/08/21 tanggal 20 Agustus 2021 tentang Kebijakan dan Pedoman Umum Manajemen Risiko Grup Keuangan Victoria.

Struktur Organisasi dan Keanggotaan Manajemen Risiko Grup Keuangan Victoria

Terkait dengan penerapan manajemen risiko terintegrasi dalam Grup Keuangan Victoria, maka Entitas Koordinator telah membentuk:

1. Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan Victoria; dan
2. Satuan Kerja Manajemen Risiko Terintegrasi.

Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan Victoria

Informasi lengkap terkait Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan Victoria telah disampaikan bab Tata Kelola Perusahaan pada Laporan Tahunan ini.

Satuan Kerja Manajemen Risiko Terintegrasi

Satuan Kerja Manajemen Risiko Terintegrasi merupakan pejabat eksekutif yang berada satu tingkat di bawah Direksi yang memimpin satuan kerja operasional dan/atau fungsi/satuan kerja manajemen risiko. Pada Entitas Koordinator, *Risk Management/Integrated Division* dipimpin oleh seorang Kepala Divisi yang bertanggung jawab langsung kepada Direktur Kepatuhan dan Manajemen Risiko.

Satuan Kerja Manajemen Risiko Terintegrasi merupakan satuan kerja independen yang terpisah dengan satuan kerja yang melaksanakan fungsi pengendalian internal dan Satuan Kerja Operasional pada setiap anggota Grup Keuangan Victoria. Selain itu, dalam penerapan manajemen risiko secara terintegrasi dalam Grup Keuangan Victoria harus bebas dari benturan kepentingan antara anggota Grup Keuangan Victoria dengan Entitas Koordinator.

Untuk memastikan efektivitas dan kecukupan sistem manajemen risiko terintegrasi, Satuan Kerja Manajemen Risiko Terintegrasi secara berkesinambungan terus melakukan pengelolaan risiko dan peninjauan ulang secara berkala.

The aforementioned explanation is contained in the Board of Directors' Decision Letter No. 003/SK-DIR/08/21 dated 20 August 2021 on Risk Management Policies and General Guidelines of Victoria Financial Group.

Organizational Structure and Composition of Victoria Financial Group Risk Management

In relation to the integrated risk management implementation within Victoria Financial Group, the Coordinating Entity has established:

1. Integrated Risk Management Committee within Victoria Financial Group; and
2. Integrated Risk Management Work Unit.

Integrated Risk Management Committee in Victoria Financial Group

Complete information regarding the Integrated Risk Management Committee in Victoria Financial Group is presented in the Corporate Governance chapter of this Annual Report.

Integrated Risk Management Work Unit

The Integrated Risk Management Work Unit is the executive officer of one level below the Board of Director, who is in charge of an operational work unit and/or risk management function/work unit. In the Coordinator Entity, the Risk Management/Integrated Division is led by a Division Head who is directly responsible to the Director of Compliance and Risk Management.

The Integrated Risk Management Work Unit Is an independent work unit separated from the work unit performing the internal control function and Operational Work Unit (risk taking unit) in each member of Victoria Group financial conglomeration. Furthermore, implementation of integrated risk management shall be free from conflict of interest among members of Victoria Group financial conglomeration and the Main Entity.

To ensure the effectiveness and adequacy of the integrated risk management system, the Integrated Risk Management Unit continuously manages the risk by conducting periodic reassessment.

Pengungkapan Kualitas Kredit Atas Aset (CR1)
Disclosure of Credit Quality over Asset (CR1)

1) Bank secara Individual / Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Deskripsi	Nilai Tercatat Bruto Gross Carrying Amount		CKPN	CKPN		CKPN (Pendekatan IRB) CKPN (IRB Approach)	Nilai Bersih (a+b-c) Net Value (a+b-c)	Description
		Tagihan yang Telah Jatuh Tempo Due Receivables	Tagihan yang Belum Jatuh Tempo Not Due Receivables		*Stage* 2 dan *Stage* 3 Stage 2 and Stage 3	*Stage* 1			
		a	b	c	d	e	f	g	
1.	Kredit	616,032	20,178,731	446,966	368,906	78,060		20,347,798	Credit
2.	Surat Berharga	-	7,463,989	1,266	-	1,266		7,462,723	Marketable Securities
3.	Transaksi Rekening Administratif	-	691,418	-	-	-		691,418	Administrative Account Transaction
4.	**Total**	616,032	28,334,139	448,232	368,906	79,326		28,501,939	**Total**

2) Pengungkapan Tambahan / Additional Disclosure

1. Tagihan yang Telah Jatuh Tempo merupakan seluruh tagihan yang telah jatuh tempo lebih dari 90 hari, baik atas pembayaran pokok dan/atau pembayaran bunga, atau tagihan kepada debitur wanprestasi.
2. Bank tidak memiliki eksposur kualitas kredit atas aset secara konsolidasi karena berdasarkan Surat Otoritas Jasa Keuangan No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi Entitas Anak PT Bank Victoria International Tbk.

1. Matured Receivable is all bill that has been overdue more than 90 days, either on the payments of principal and/or interest; or bills to defaulting debtors.
2. The Bank does not have credit quality exposure on assets on a consolidated basis due to based on Financial Services Authority Letter No. S-301/PB.101/2022 on Submission of the Decision on Permit to the Acquisition of PT Bank Victoria Syariah's Shares by PT Victoria Investama Tbk and Board of Directors' Decision Letter No. 113/DIR-EKS/12/22 on the Divestment Implementation Report on PT Bank Victoria International Tbk's (Bank) Self Initiative, therefore, PT Bank Victoria Syariah is no longer a subsidiary of PT Bank Victoria International Tbk.

Pengungkapan Mutasi Kredit dan Surat Berharga yang Telah Jatuh Tempo (CR2)
Disclosure of Changes in Due Loans and Securities (CR2)

1) Bank secara Individual / Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Deskripsi	2024	Description
1.	Kredit dan Surat Berharga yang Telah Jatuh Tempo pada Periode Pelaporan Terakhir	**678,097**	Due loans and securities on Last Reporting Period
2.	Kredit dan Surat Berharga yang Telah Jatuh Tempo sejak Periode Pelaporan Terakhir	**203,817**	Due Loans and Securities Since Last Reporting Period
3.	Kredit dan Surat Berharga yang Kembali Menjadi Tagihan yang Belum Jatuh Tempo	**63,374**	Not Due Loans and Securities that Return to Receivables
4.	Nilai Hapus Buku	**121,033**	Write-off Value
5.	Perubahan Lain	**(81,474)**	Other Changes
6.	**Kredit dan Surat Berharga yang Telah Jatuh Tempo pada Akhir Periode Pelaporan (1+2-3-4+5)**	**616,032**	**Due Loans and Securities on Last Reporting Period (1+2-3-4+5)**

2) Pengungkapan Tambahan / Additional Disclosure

Bank tidak memiliki eksposur mutasi kredit dan surat berharga yang telah jatuh tempo secara konsolidasi karena berdasarkan Surat Otoritas Jasa Keuangan No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi Atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi entitas anak PT Bank Victoria International Tbk.

The Bank does not have exposure to changes in due loans and securities on a consolidated basis due to based on Financial Services Authority Letter No. S-301/PB.101/2022 on Submission of the Decision on Permit to the Acquisition of PT Bank Victoria Syariah's Shares by PT Victoria Investama Tbk and Board of Directors' Decision Letter No. 113/DIR-EKS/12/22 on the Divestment Implementation Report on PT Bank Victoria International Tbk's (Bank) Self Initiative, therefore, PT Bank Victoria Syariah is no longer a subsidiary of PT Bank Victoria International Tbk.

Tabel Pengungkapan Tagihan Bersih Berdasarkan Wilayah
Table of Disclosure of Net Receivables by Area

1) Bank secara Individual / Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2024 / 31 December 2024					Portfolio Category
		Tagihan Bersih Berdasarkan Wilayah / Net Receivables by Region					
		Zona Indonesia Barat (Wilayah 1) / Indonesia Zone West (Zone 1)	Zona Indonesia Tengah (Wilayah 2) / Indonesia Zone Center (Zone 2)	Zona Indonesia Timur (Wilayah 3) / Indonesia Zone East (Zone 3)	Di Luar Indonesia (Wilayah 4) / Outside Indonesia (Zone 4)	Total	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	
1.	Tagihan kepada Pemerintah	7,295,086	-	-	-	7,295,086	Receivables from Government
2.	Tagihan kepada Entitas Sektor Publik	1,150,922	-	-	-	1,150,922	Receivables from Public Sector Entities
3.	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	2,523	-	-	-	2,523	Receivables from Multilateral Development Banks and International Institutions
4.	Tagihan kepada Bank	256,994	4,374	-	37,884	299,252	Receivables from Banks
5.	Tagihan berupa *Covered Bond*	-	-	-	-	-	Receivables in the form of Covered Bond
6.	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya	3,719,629	-	-	-	3,719,629	Receivables from Securities Companies and Other Financial Services Institutions
7.	Tagihan berupa Surat Berharga/Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya	219,934	-	-	-	219,934	Receivables in the form of Subordinated Securities/Receivables, Equity, and Other Capital Instruments
8.	Kredit Beragunan Rumah Tinggal	148,951	1,607	-	-	150,558	Residential Property Collateralized Loans
9.	Kredit Beragunan Properti Komersial	3,459,718	44,986	-	-	3,504,704	Commercial Property Collateralized Loans
10.	Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi	-	-	-	-	-	Loan by Land Acquisition, Land Processing, and Construction
11.	Kredit Pegawai/Pensiunan	-	-	-	-	-	Employee/Retirement Loans
12.	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel	2,570,289	171,326	10,983	-	2,752,599	Receivables from Microbusiness, Small Business, and Retail Portfolio
13.	Tagihan kepada Korporasi	10,863,608	1,054,741	76,589	-	11,994,937	Receivables from Corporations
14.	Tagihan yang Telah Jatuh Tempo	321,962	123,189	-	-	445,151	Due Receivables
15.	Aset Lainnya	1,043,860	-	-	-	1,043,860	Other Assets
	Total	31,053,477	1,400,222	87,572	37,884	32,579,154	**Total**

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2023 31 December 2023					Portfolio Category
		Tagihan Bersih Berdasarkan Wilayah Net Receivables by Region					
		Zona Indonesia Barat (Wilayah 1) Indonesia Zone West (Zone 1)	Zona Indonesia Tengah (Wilayah 2) Indonesia Zone Center (Zone 2)	Zona Indonesia Timur (Wilayah 3) Indonesia Zone East (Zone 3)	Di Luar Indonesia (Wilayah 4) Outside Indonesia (Zone 4)	Total	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	
1.	Tagihan kepada Pemerintah	6,111,398	-	-	-	**6,111,398**	Receivables from Government
2.	Tagihan kepada Entitas Sektor Publik	958,467	-	-	-	**958,467**	Receivables from Public Sector Entities
3.	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	53,157	-	-	-	**53,157**	Receivables from Multilateral Development Banks and International Institutions
4.	Tagihan kepada Bank	2,182,723	-	106,469	66	**2,289,258**	Receivables from Banks
5.	Tagihan berupa *Covered Bond*	-	-	-	-	**-**	Receivables in the form of Covered Bond
6.	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya	3,564,372	-	-	-	**3,564,372**	Receivables from Securities Companies and Other Financial Services Institutions
7.	Tagihan berupa Surat Berharga/Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya	215,931	-	-	-	**215,931**	Receivables in the form of Subordinated Securities/Receivables, Equity, and Other Capital Instruments
8.	Kredit Beragunan Rumah Tinggal	146,380	4,488	-	-	**150,868**	Residential Property Collateralized Loans
9.	Kredit Beragunan Properti Komersial	3,119,832	30,157	-	-	**3,149,989**	Commercial Property Collateralized Loans
10.	Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi	-	-	-	-	**-**	Loan by Land Acquisition, Land Processing, and Construction
11.	Kredit Pegawai/Pensiunan	-	-	-	-	**-**	Employee/Retirement Loans
12.	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel	2,450,260	257,540	9,601	-	**2,717,400**	Receivables from Microbusiness, Small Business, and Retail Portfolio
13.	Tagihan kepada Korporasi	9,270,754	772,052	61,554	-	**10,104,360**	Receivables from Corporations
14.	Tagihan yang Telah Jatuh Tempo	546,949	38,771	-	-	**585,719**	Due Receivables
15.	Aset Lainnya	1,183,389	-	-	-	**1,183,389**	Other Assets
	Total	29,803,611	1,103,007	177,624	66	**31,084,309**	**Total**

*) Berdasarkan Surat Otoritas Jasa Keuangan No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi Entitas Anak PT Bank Victoria International Tbk.
Based on Financial Services Authority Letter No. S-301/PB.101/2022 on Submission of the Decision on Permit to the Acquisition of PT Bank Victoria Syariah's Shares by PT Victoria Investama Tbk and Board of Directors' Decision Letter No. 113/DIR-EKS/12/22 on the Divestment Implementation Report on PT Bank Victoria International Tbk's (Bank) Self Initiative, therefore, PT Bank Victoria Syariah is no longer a subsidiary of PT Bank Victoria International Tbk.

Tabel Pengungkapan Tagihan Bersih Berdasarkan Sektor Ekonomi - Bank secara Individual

Table of Disclosure of Net Receivables by Economic Sector – Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi Economic Sector	Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Tagihan berupa *Covered Bond* Receivables in the form of Covered Bond	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	Kredit Beragunan Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragunan Properti Komersial Commercial Property Collateralized Loans	Kredit untuk Pengadaan Tanah, Pengelolaan Tanah, dan Konstruksi Loan by Land Acquisition, Land Processing, and Construction	Kredit Pegawai/ Pensiun Employee/ Retirement Loans	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
								31 DESEMBER 2024 31 DECEMBER 2024								
1.	Pertanian, Kehutanan, dan Perikanan Agriculture, Forestry, and Fisheries	-	-	-	-			-	-	-		-	147,427	396,235	2,517	-
2.	Pertambangan dan Penggalian Mining and Extractive Industries	-	-	-	-			-	-	-		-	136,843	863,176	-	-
3.	Industri pengolahan Processing Industry	-	-	-	-			-	-	-		-	414,323	2,761,689	21,033	-
4.	Pengadaan Listrik, Gas, Uap/ Air Panas dan Udara Dingin Procurement of Electricity, Gas, Steam/ Hot Water, and Cold Air	-	-	-	-			-	-	-		-	62,809	33,830	-	-

No.	Sektor Ekonomi Economic Sector	Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Tagihan berupa *Covered Bond* Receivables in the form of Covered Bond	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	Kredit Beragunan Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragunan Properti Komersial Commercial Property Collateralized Loans	Kredit untuk Pengadaan Tanah, Pengelolaan Tanah, dan Konstruksi Loan by Land Acquisition, Land Processing, and Construction	Kredit Pegawai/ Pensiun Employee/ Retirement Loans	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
5.	Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah Water Management, Waste Water Management, Waste Management and Recycle	-	-	-	-			-	-	-		-	29,955	875	-	-
6.	Konstruksi Construction	-	-	-	-			-	-	1,138,433		-	-	56,353	4,545	-
7.	Perdagangan Besar dan Eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor Wholesale and Retail Trade; Car and Motorcycle Repair and Maintenance	-	-	-	-			-	-	-		-	1,148,414	2,605,047	24,738	-
8.	Pengangkutan dan Pergudangan Transportation and Warehousing	-	-	-	-			-	-	-		-	238,787	380,998	-	-

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi Economic Sector	Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Tagihan berupa *Covered Bond* Receivables in the form of Covered Bond	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	Kredit Beragunan Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragunan Properti Komersial Commercial Property Collateralized Loans	Kredit untuk Pengadaan Tanah, Pengelolaan Tanah, dan Konstruksi Loan by Land Acquisition, Land Processing, and Construction	Kredit Pegawai/ Pensiun Employee/ Retirement Loans	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
9.	Penyediaan Akomodasi dan Penyediaan Makan Minum Provision of Accomodation and Foods & Beverages	-	-	-	-			-	-	43,703		-	89,668	566,245	96,989	-
10.	Informasi dan Komunikasi Information and Communication	-	-	-	-			-	-	-		-	72,665	208,776	34,415	-
11.	Aktivitas Keuangan dan Asuransi Financial and Insurance Activities	7,295,086	1,137,374	2,523	299,252		3,719,629	219,934	-	-		-	230,934	2,828,407	-	-
12.	*Real Estate* Real Estate	-	8,542	-	-			-	-	2,313,776		-	-	-	250,675	-
13.	Aktivitas Profesi, Ilmiah, dan Teknis Professional, Scientific, and Technical Activities	-	-	-	-			-	-	8,792		-	34,550	496,295	556	-

No.	Sektor Ekonomi Economic Sector	Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Tagihan berupa *Covered Bond* Receivables in the form of Covered Bond	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	Kredit Beragunan Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragunan Properti Komersial Commercial Property Collateralized Loans	Kredit untuk Pengadaan Tanah, Pengelolaan Tanah, dan Konstruksi Loan by Land Acquisition, Land Processing, and Construction	Kredit Pegawai/ Pensiun Employee/ Retirement Loans	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
14.	Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Ketenagakerjaan, Agen Perjalanan, dan Penunjang Usaha Lainnya Leasing and Leasing Activities without Option Rights, Employment, Travel Agencies, and Other Business Supports	-	5,006	-	-			-	-	-		-	75,890	505,031	935	-
15.	Administrasi Pemerintahan, Pertahanan, dan Jaminan Sosial Wajib Government Administration, Land Business and Mandatory Social Service	-	-	-	-			-	-	-		-	-	-	-	-
16.	Pendidikan Education	-	-	-	-			-	-	-		-	32,630	80,513	1,488	-
17.	Aktivitas Kesehatan Manusia dan Aktivitas Sosial Human Health Activities and Social Activities	-	-	-	-			-	-	-		-	5,551	114,715	-	-

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi Economic Sector	Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Tagihan berupa *Covered Bond* Receivables in the form of Covered Bond	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	Kredit Beragunan Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragunan Properti Komersial Commercial Property Collateralized Loans	Kredit untuk Pengadaan Tanah, Pengelolaan Tanah, dan Konstruksi Loan by Land Acquisition, Land Processing, and Construction	Kredit Pegawai/ Pensiun Employee/ Retirement Loans	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
18.	Kesenian, Hiburan, dan Rekreasi Arts, Entertainment, and Recreation	-	-	-	-			-	-	-		-	32,053	24,987	-	-
19.	Aktivitas Jasa Lainnya Other Services Activities	-	-	-	-			-	-	-		-	-	-	-	-
20.	Aktivitas Rumah Tangga sebagai Pemberi Kerja; Aktivitas yang Menghasilkan Barang dan Jasa oleh Rumah Tangga yang Digunakan untuk Memenuhi Kebutuhan Sendiri Household Activities as an Employer; Activities that Produce Goods and Services by Households that are Used to Meet Their Own Needs	-	-	-	-			-	-	-		-	100	-	-	-

No.	Sektor Ekonomi Economic Sector	Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Tagihan berupa *Covered Bond* Receivables in the form of Covered Bond	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	Kredit Beragunan Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragunan Properti Komersial Commercial Property Collateralized Loans	Kredit untuk Pengadaan Tanah, Pengelolaan Tanah, dan Konstruksi Loan by Land Acquisition, Land Processing, and Construction	Kredit Pegawai/ Pensiun Employee/ Retirement Loans	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
21.	Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya International Organizations and Other Extra International Organizations Activities	-	-	-	-			-	-	-		-	-	-	-	-
22.	Rumah Tangga Household	-			-			-		-			-	-		
23.	Bukan Lapangan Usaha Non-Business	-	-	-	-			-	150,558	-		-	-	71,765	7,258	-
24.	Lainnya Others	-	-	-	-			-	-	-		-	-	-	-	1,043,860
	Total	**7,295,086**	**1,150,922**	**2,523**	**299,252**	**-**	**3,719,629**	**219,934**	**150,558**	**3,504,704**		**-**	**2,752,599**	**11,994,937**	**445,151**	**1,043,860**

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi Economic Sector	Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Tagihan berupa *Covered Bond* Receivables in the form of Covered Bond	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	Kredit Beragunan Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragunan Properti Komersial Commercial Property Collateralized Loans	Kredit untuk Pengadaan Tanah, Pengelolaan Tanah, dan Konstruksi Loan by Land Acquisition, Land Processing, and Construction	Kredit Pegawai/ Pensiun Employee/ Retirement Loans	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
								31 DESEMBER 2023 31 DECEMBER 2023								
1.	Pertanian, Kehutanan, dan Perikanan Agriculture, Forestry, and Fisheries	-	-	-	-	-	-	-	-	-	-	-	128,136	489,871	4,875	-
2.	Pertambangan dan Penggalian Mining and Extractive Industries	-	-	-	10,251	-	-	-	-	-	-	-	74,627	678,707	5	-
3.	Industri pengolahan Processing Industry	9,920	-	-	-	-	-	-	-	-	-	-	363,757	1,965,225	9,685	-
4.	Pengadaan Listrik, Gas, Uap/ Air Panas dan Udara Dingin Procurement of Electricity, Gas, Steam/ Hot Water, and Cold Air	-	-	-	260,418	-	-	-	-	-	-	-	64,399	23,972	-	-

No.	Sektor Ekonomi Economic Sector	Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Tagihan berupa *Covered Bond* Receivables in the form of Covered Bond	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	Kredit Beragunan Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragunan Properti Komersial Commercial Property Collateralized Loans	Kredit untuk Pengadaan Tanah, Pengelolaan Tanah, dan Konstruksi Loan by Land Acquisition, Land Processing, and Construction	Kredit Pegawai/ Pensiun Employee/ Retirement Loans	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
5.	Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah Water Management, Waste Water Management, Waste Management and Recycle	-	-	-	251,821	-	-	-	-	-	-	-	30,049	-	-	-
6.	Konstruksi Construction	-	-	-	100,727	-	-	-	-	772,460	-	-	-	102,513	18,182	-
7.	Perdagangan Besar dan Eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor Wholesale and Retail Trade; Car and Motorcycle Repair and Maintenance	-	-	-	47,255	-	-	-	-	-	-	-	1,047,019	2,281,448	54,196	-
8.	Pengangkutan dan Pergudangan Transportation and Warehousing	-	-	-	-	-	-	-	-	-	-	-	200,802	268,466	126,408	-

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi Economic Sector	Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Tagihan berupa *Covered Bond* Receivables in the form of Covered Bond	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	Kredit Beragunan Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragunan Properti Komersial Commercial Property Collateralized Loans	Kredit untuk Pengadaan Tanah, Pengelolaan Tanah, dan Konstruksi Loan by Land Acquisition, Land Processing, and Construction	Kredit Pegawai/ Pensiun Employee/ Retirement Loans	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
9.	Penyediaan Akomodasi dan Penyediaan Makan Minum Provision of Accomodation and Foods & Beverages	-	-	-	-	-	-	-	-	44,628	-	-	112,013	702,802	36,836	-
10.	Informasi dan Komunikasi Information and Communication	40,790	-	-	-	-	-	-	-	2,000	-	-	85,887	234,220	-	-
11.	Aktivitas Keuangan dan Asuransi Financial and Insurance Activities	6,060,689	931,856	53,157	1,415,151	-	3,564,372	215,931	-	-	-	-	381,219	2,083,396	-	-
12.	*Real Estate* Real Estate	-	14,961	-	36,041	-	-	-	-	2,322,497	-	-	-	1,499	319,028	-
13.	Aktivitas Profesi, Ilmiah, dan Teknis Professional, Scientific, and Technical Activities	-	-	-	4,651	-	-	-	-	8,404	-	-	39,683	424,866	5,573	-

No.	Sektor Ekonomi Economic Sector	Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Tagihan berupa *Covered Bond* Receivables in the form of Covered Bond	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	Kredit Beragunan Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragunan Properti Komersial Commercial Property Collateralized Loans	Kredit untuk Pengadaan Tanah, Pengelolaan Tanah, dan Konstruksi Loan by Land Acquisition, Land Processing, and Construction	Kredit Pegawai/ Pensiun Employee/ Retirement Loans	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
14.	Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Ketenagakerjaan, Agen Perjalanan, dan Penunjang Usaha Lainnya Leasing and Leasing Activities without Option Rights, Employment, Travel Agencies, and Other Business Supports	-	11,650	-	162,942	-	-	-	-	-	-	-	112,971	663,753	904	-
15.	Administrasi Pemerintahan, Pertahanan, dan Jaminan Sosial Wajib Government Administration, Land Business, and Mandatory Social Service	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16.	Pendidikan Education	-	-	-	-	-	-	-	-	-	-	-	29,178	97,842	1,727	-
17.	Aktivitas Kesehatan Manusia dan Aktivitas Sosial Human Health Activities and Social Activities	-	-	-	-	-	-	-	-	-	-	-	11,862	20,653	-	-

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi Economic Sector	Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Tagihan berupa *Covered Bond* Receivables in the form of Covered Bond	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	Kredit Beragunan Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragunan Properti Komersial Commercial Property Collateralized Loans	Kredit untuk Pengadaan Tanah, Pengelolaan Tanah, dan Konstruksi Loan by Land Acquisition, Land Processing, and Construction	Kredit Pegawai/ Pensiun Employee/ Retirement Loans	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
18.	Kesenian, Hiburan, dan Rekreasi Arts, Entertainment, and Recreation	-	-	-	-	-	-	-	-	-	-	-	35,799	36,052	-	-
19.	Aktivitas Jasa Lainnya Other Services Activities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20.	Aktivitas Rumah Tangga sebagai Pemberi Kerja; Aktivitas yang Menghasilkan Barang dan Jasa oleh Rumah Tangga yang Digunakan untuk Memenuhi Kebutuhan Sendiri Household Activities as an Employer; Activities that Produce Goods and Services by Households that are Used to Meet Their Own Needs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

No.	Sektor Ekonomi Economic Sector	Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Tagihan berupa *Covered Bond* Receivables in the form of Covered Bond	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	Kredit Beragunan Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragunan Properti Komersial Commercial Property Collateralized Loans	Kredit untuk Pengadaan Tanah, Pengelolaan Tanah, dan Konstruksi Loan by Land Acquisition, Land Processing, and Construction	Kredit Pegawai/ Pensiun Employee/ Retirement Loans	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
21.	Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya International Organizations and Other Extra International Organizations Activities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
22.	Rumah Tangga Household	-			-	-	-	-		-	-		-	-		
23.	Bukan Lapangan Usaha Non-Business	-	-	-	-	-	-	-	150,868	-	-	-	-	29,074	8,301	-
24.	Lainnya Others	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,183,389
	Total	**6,111,398**	**958,467**	**53,157**	**2,289,258**	**-**	**3,564,372**	**215,931**	**150,868**	**3,149,989**	**-**	**-**	**2,717,400**	**10,104,360**	**585,719**	**1,183,389**

*) Berdasarkan Surat Otoritas Jasa Keuangan No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi Entitas Anak PT Bank Victoria International Tbk.
Based on Financial Services Authority Letter No. S-301/PB.101/2022 on Submission of the Decision on Permit to the Acquisition of PT Bank Victoria Syariah's Shares by PT Victoria Investama Tbk and Board of Directors' Decision Letter No. 113/DIR-EKS/12/22 on the Divestment Implementation Report on PT Bank Victoria International Tbk's (Bank) Self Initiative, therefore, PT Bank Victoria Syariah is no longer a subsidiary of PT Bank Victoria International Tbk.

Tabel Pengungkapan Tagihan Bersih Berdasarkan Sisa Jangka Waktu Kontrak - Bank secara Individual
Table of Disclosure of Net Receivables by Remaining Contract Period – Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2024 / 31 December 2024						Portfolio Category
		Tagihan Bersih Berdasarkan Sisa Jangka Waktu Kontrak / Net Receivables by Remaining Contract Period						
		≤1 Tahun / ≤1 Year	>1 Tahun s.d. 3 Tahun / >1 to 3 Years	>3 Tahun s.d. 5 Tahun / >3 to 5 Years	>5 Tahun / >5 Years	Non-Kontraktual / Non-Contractual	Total	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(2)
1.	Tagihan kepada Pemerintah	3,154,726	1,542,009	315,059	2,283,291	-	7,295,086	Receivables from Government
2.	Tagihan kepada Entitas Sektor Publik	1,142,380	8,542	-	-	-	1,150,922	Receivables from Public Sector Entities
3.	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	-	2,523	-	-	-	2,523	Receivables from Multilateral Development Banks and International Institutions
4.	Tagihan kepada Bank	299,219	33	-	-	-	299,252	Receivables from Banks
5.	Tagihan berupa *Covered Bond*	-	-	-	-	-	-	Receivables in the form of Covered Bond
6.	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya	2,248,119	899,917	571,593	-	-	3,719,629	Receivables from Securities Companies and Other Financial Services Institutions
7.	Tagihan berupa Surat Berharga/Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya	219,934	-	-	-	-	219,934	Receivables in the form of Subordinated Securities/ Receivables, Equity, and Other Capital Instruments
8.	Kredit Beragunan Rumah Tinggal	2,355	10,652	27,397	110,154	-	150,558	Residential Property Collateralized Loans
9.	Kredit Beragunan Properti Komersial	1,624,722	214,350	599,858	1,065,774	-	3,504,704	Commercial Property Collateralized Loans
10.	Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi	-	-	-	-	-	-	Loan by Land Acquisition, Land Processing, and Construction
11.	Kredit Pegawai/Pensiunan	-	-	-	-	-	-	Employee/ Retirement Loans
12.	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel	2,154,910	171,159	324,368	102,161	-	2,752,599	Receivables from Microbusiness, Small Business, and Retail Portfolio
13.	Tagihan kepada Korporasi	5,855,800	2,027,808	2,392,184	1,715,191	3,954	11,994,937	Receivables from Corporations
14.	Tagihan yang Telah Jatuh Tempo	73,690	231,614	10,086	129,761	-	445,151	Due Receivables
15.	Aset Lainnya	-	-	-	-	1,043,860	1,043,860	Other Assets
	Total	16,775,856	5,108,607	4,240,546	5,406,332	1,047,814	32,579,154	**Total**

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2023 31 December 2023						Portfolio Category
		Tagihan Bersih Berdasarkan Sisa Jangka Waktu Kontrak Net Receivables by Remaining Contract Period						
		≤1 Tahun ≤1 Year	>1 Tahun s.d. 3 Tahun >1 to 3 Years	>3 Tahun s.d. 5 Tahun >3 to 5 Years	>5 Tahun >5 Years	Non-Kontraktual Non-Contractual	Total	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(2)
1.	Tagihan kepada Pemerintah	1,725,237	1,225,499	1,172,121	1,988,542	-	**6,111,398**	Receivables from Government
2.	Tagihan kepada Entitas Sektor Publik	920,975	37,492	-	-	-	**958,467**	Receivables from Public Sector Entities
3.	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	50,633	2,523	-	-	-	**53,157**	Receivables from Multilateral Development Banks and International Institutions
4.	Tagihan kepada Bank	1,651,555	637,703	-	-	-	**2,289,258**	Receivables from Banks
5.	Tagihan berupa *Covered Bond*	-	-	-	-	-	**-**	Receivables in the form of Covered Bond
6.	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya	2,076,027	654,333	794,012	40,000	-	**3,564,372**	Receivables from Securities Companies and Other Financial Services Institutions
7.	Tagihan berupa Surat Berharga/Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya	215,931	-	-	-	-	**215,931**	Receivables in the form of Subordinated Securities/ Receivables, Equity, and Other Capital Instruments
8.	Kredit Beragunan Rumah Tinggal	6,337	8,538	39,496	96,497	-	**150,868**	Residential Property Collateralized Loans
9.	Kredit Beragunan Properti Komersial	1,212,648	301,700	570,717	1,064,924	-	**3,149,989**	Commercial Property Collateralized Loans
10.	Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi	-	-	-	-	-	**-**	Loan by Land Acquisition, Land Processing, and Construction
11.	Kredit Pegawai/Pensiunan	-	-	-	-	-	**-**	Employee/ Retirement Loans
12.	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel	1,999,904	268,659	282,698	166,140	-	**2,717,400**	Receivables from Microbusiness, Small Business, and Retail Portfolio
13.	Tagihan kepada Korporasi	6,035,422	1,287,764	1,327,104	1,454,071	-	**10,104,360**	Receivables from Corporations
14.	Tagihan yang Telah Jatuh Tempo	246,649	279,841	13,362	45,868	-	**585,719**	Due Receivables
15.	Aset Lainnya	-	-	-	-	1,183,389	**1,183,389**	Other Assets
	Total	**16,141,318**	**4,704,050**	**4,199,510**	**4,856,041**	**1,183,389**	**31,084,309**	**Total**

*) Berdasarkan Surat Otoritas Jasa Keuangan No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi Entitas Anak PT Bank Victoria International Tbk.
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Tabel Pengungkapan Tagihan dan Pencadangan Berdasarkan Wilayah - Bank secara Individual
Table of Disclosure of Receivables and Allowances by Area – Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Keterangan	31 Desember 2024 / 31 December 2024					31 Desember 2023 / 31 December 2023					Description
		Wilayah / Region					Wilayah / Region					
		Zona Indonesia Barat (Wilayah 1) Indonesia Zone West (Zone 1)	Zona Indonesia Tengah (Wilayah 2) Indonesia Zone Center (Zone 2)	Zona Indonesia Timur (Wilayah 3) Indonesia Zone East (Zone 3)	Di Luar Indonesia (Wilayah 4) Outside Indonesia (Zone 4)	Total	Zona Indonesia Barat (Wilayah 1) Indonesia Zone West (Zone 1)	Zona Indonesia Tengah (Wilayah 2) Indonesia Zone Center (Zone 2)	Zona Indonesia Timur (Wilayah 3) Indonesia Zone East (Zone 3)	Di Luar Indonesia (Wilayah 4) Outside Indonesia (Zone 4)	Total	
(1)	(2)	(4)	(5)	(6)	(7)	(8)	(3)	(4)	(5)	(6)	(7)	(2)
1.	Tagihan	**29,434,987**	**1,418,073**	**86,791**	**37,884**	**30,977,735**	27,023,562	1,176,263	176,272	66	**28,376,162**	Receivables
2.	Tagihan yang Mengalami Peningkatan dan Pemburukan Risiko Kredit (*Stage* 2 dan *Stage* 3)											Claims with Increased and Worsening Credit Risk (Stage 2 and Stage 3)
	a. Belum Jatuh Tempo	**733,392**	**142,939**	**-**	**-**	**876,331**	892,709	271,513	-	-	**1,164,222**	a. Not Due
	b. Telah Jatuh Tempo	**463,443**	**152,590**	**-**	**-**	**616,032**	669,350	44,737	-	-	**714,087**	b. Due
3.	CKPN - *Stage* 1	**73,401**	**4,436**	**223**	**-**	**78,060**	108,625	3,905	276	-	**112,806**	CKPN - Stage 1
4.	CKPN - *Stage* 2	**133,231**	**55,214**	**-**	**-**	**188,446**	213,614	120,084	-	-	**333,699**	CKPN - Stage 2
5.	CKPN - *Stage* 3	**143,701**	**36,758**	**-**	**-**	**180,460**	122,401	5,966	-	-	**128,368**	CKPN - Stage 3
6.	Tagihan yang Dihapus Buku	**(255,035)**	**(38,830)**	**-**	**-**	**(293,865)**	(139,196)	(54,726)	-	-	**(193,922)**	Receivables Written Off

*) Berdasarkan Surat Otoritas Jasa Keuangan No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi Atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi entitas anak PT Bank Victoria International Tbk.
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Tabel Pengungkapan Tagihan dan Pencadangan Berdasarkan Sektor Ekonomi - Bank secara Individual

Table of Disclosure of Receivables and Allowances by Economic Sector – Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi	Tagihan Receivables	Tagihan yang Mengalami Penurunan Nilai Impaired Receivables		Cadangan Kerugian Penurunan Nilai (CKPN) - *Stage* 1 Losses Allowance (ILA) - Stage 1	Cadangan Kerugian Penurunan Nilai (CKPN) - *Stage* 2 Losses Allowance (ILA) - Stage 1	Cadangan Kerugian Penurunan Nilai (CKPN) - *Stage* 3 Allowance (ILA) - Stage 3	Tagihan yang Dihapus Buku Receivables Written Off	Economic Sector
			Belum Jatuh Tempo Not Due	Telah Jatuh Tempo Due					
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(2)
					31 DESEMBER 2024 31 DECEMBER 2024				
1.	Pertanian, Kehutanan, dan Perikanan	526,922	-	10,541	1,407	-	8,024	-	Agriculture, Forestry, and Fisheries
2.	Pertambangan dan Penggalian	944,621	-	-	2,691	-	-	-	Mining and Extractive Industries
3.	Industri Pengolahan	3,056,929	146,959	30,934	7,972	53,492	19,480	-	Processing Industry
4.	Pengadaan Listrik, Gas, Uap/Air Panas, dan Udara Dingin	98,181	31,437	-	231	3,919	-	-	Procurement of Electricity, Gas, Steam/Hot Water, and Cold Air
5.	Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah	26,224	-	-	37	-	-	-	Water Management, Waste Water Management, Waste Management and Recycle
6.	Konstruksi	1,113,764	137,550	6,126	1,748	15,469	1,581	-	Construction
7.	Perdagangan Besar dan Eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor	3,506,771	125,687	44,084	11,033	32,887	19,345	(96,333)	Wholesale and Retail Trade; Car and Motorcycle Repair and Maintenance
8.	Pengangkutan dan Pergudangan	597,663	39,952	-	1,787	3,789	-	(134,001)	Transportation and Warehousing
9.	Penyediaan Akomodasi dan Penyediaan Makan Minum	770,731	28,626	109,873	3,895	8,950	12,884	(38,830)	Provision of Accomodation and Foods & Beverages
10.	Informasi dan Komunikasi	381,556	12,294	114,852	672	744	80,437	-	Information and Communication
11.	Aktivitas Keuangan dan Asuransi	13,329,775	-	-	18,925	-	-	-	Financial and Insurance Activities
12.	*Real Estate*	3,962,750	286,421	276,309	21,709	60,554	25,634	(24,700)	Real Estate
13.	Aktivitas Profesi, Ilmiah, dan Teknis	538,439	10,115	5,750	1,415	1,105	5,194	-	Professional, Scientific, and Technical Activities

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi	Tagihan Receivables	Tagihan yang Mengalami Penurunan Nilai Impaired Receivables		Cadangan Kerugian Penurunan Nilai (CKPN) - *Stage* 1 Losses Allowance (ILA) - Stage 1	Cadangan Kerugian Penurunan Nilai (CKPN) - *Stage* 2 Losses Allowance (ILA) - Stage 1	Cadangan Kerugian Penurunan Nilai (CKPN) - *Stage* 3 Allowance (ILA) - Stage 3	Tagihan yang Dihapus Buku Receivables Written Off	Economic Sector
			Belum Jatuh Tempo Not Due	Telah Jatuh Tempo Due					
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(2)
14.	Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Ketenagakerjaan, Agen Perjalanan, dan Penunjang Usaha Lainnya	**549,822**	**19,454**	**1,262**	**1,429**	**1,613**	**327**	**-**	Leasing and Leasing Activities Without Option Rights, Employment, Travel Agencies, and Other Business Supports
15.	Administrasi Pemerintahan, Pertahanan, dan Jaminan Sosial Wajib	**-**	**-**	**-**	**-**	**-**	**-**	**-**	Government Administration, Land Business, and Mandatory Social Service
16.	Pendidikan	**115,126**	**24,384**	**2,005**	**258**	**2,856**	**518**	**-**	Education
17.	Aktivitas Kesehatan Manusia dan Aktivitas Sosial	**118,087**	**-**	**-**	**386**	**-**	**-**	**-**	Human Health Activities and Social Activities
18.	Kesenian, Hiburan, dan Rekreasi	**56,826**	**-**	**-**	**220**	**-**	**-**	**-**	Arts, Entertainment, and Recreation
19.	Aktivitas Jasa Lainnya	**-**	**-**	**-**	**-**	**-**	**-**	**-**	Other Services Activities
20.	Aktivitas Rumah Tangga sebagai Pemberi Kerja; Aktivitas yang Menghasilkan Barang dan Jasa oleh Rumah Tangga yang Digunakan untuk Memenuhi Kebutuhan Sendiri	**-**	**-**	**-**	**0**	**-**	**-**	**-**	Household Activities as an Employer; Activities that Produce Goods and Services by Households that are Used to Meet Their Own Needs
21.	Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya	**-**	**-**	**-**	**-**	**-**	**-**	**-**	International Organizations and Other Extra International Organizations Activities
22.	Rumah Tangga	**-**	**-**	**-**				**-**	Household
23.	Bukan Lapangan Usaha	**239,687**	**13,454**	**14,295**	**2,245**	**3,068**	**7,037**	**-**	Non-Business
24.	Lainnya	**1,043,860**	**-**	**-**	**-**	**-**	**-**	**-**	Others
	Total	**30,977,735**	**876,331**	**616,032**	**78,060**	**188,446**	**180,460**	**(293,865)**	**Total**

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi	Tagihan Receivables	Tagihan yang Mengalami Penurunan Nilai Impaired Receivables		Cadangan Kerugian Penurunan Nilai (CKPN) - *Stage* 1 Losses Allowance (ILA) - Stage 1	Cadangan Kerugian Penurunan Nilai (CKPN) - *Stage* 2 Losses Allowance (ILA) - Stage 1	Cadangan Kerugian Penurunan Nilai (CKPN) - *Stage* 3 Allowance (ILA) - Stage 3	Tagihan yang Dihapus Buku Receivables Written Off	Economic Sector
			Belum Jatuh Tempo Not Due	Telah Jatuh Tempo Due					
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(2)
					31 DESEMBER 2023 31 DECEMBER 2023				
1.	Pertanian, Kehutanan, dan Perikanan	582,543	29,377	6,159	1,917	11,494	1,283	-	Agriculture, Forestry, and Fisheries
2.	Pertambangan dan Penggalian	731,967	-	6	2,195	-	2	-	Mining and Extractive Industries
3.	Industri Pengolahan	2,250,155	138,937	17,849	7,078	44,373	8,164	(18,296)	Processing Industry
4.	Pengadaan Listrik, Gas, Uap/Air Panas, dan Udara Dingin	351,576	36,395	-	219	4,588	-	-	Procurement of Electricity, Gas, Steam/Hot Water, and Cold Air
5.	Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah	277,711	-	-	40	-	-	-	Water Management, Waste Water Management, Waste Management and Recycle
6.	Konstruksi	870,949	97,667	31,373	1,600	14,922	13,191	(39,975)	Construction
7.	Perdagangan Besar dan Eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor	2,910,906	110,218	105,801	24,631	28,986	51,605	(35,070)	Wholesale and Retail Trade; Car and Motorcycle Repair and Maintenance
8.	Pengangkutan dan Pergudangan	572,323	-	137,501	1,819	-	11,093	(11,083)	Transportation and Warehousing
9.	Penyediaan Akomodasi dan Penyediaan Makan Minum	964,570	174,480	40,879	3,160	86,850	4,042	(54,199)	Provision of Accomodation and Foods & Beverages
10.	Informasi dan Komunikasi	377,600	114,700	-	569	25,449	-	-	Information and Communication
11.	Aktivitas Keuangan dan Asuransi	10,948,529	3,121	-	23,268	377	-	-	Financial and Insurance Activities
12.	*Real Estate*	4,522,162	334,016	351,888	40,538	99,818	32,860	(24,687)	Real Estate
13.	Aktivitas Profesi, Ilmiah, dan Teknis	457,265	2,648	8,750	1,454	302	3,177	-	Professional, Scientific, and Technical Activities

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi	Tagihan Receivables	Tagihan yang Mengalami Penurunan Nilai Impaired Receivables		Cadangan Kerugian Penurunan Nilai (CKPN) - *Stage* 1 Losses Allowance (ILA) - Stage 1	Cadangan Kerugian Penurunan Nilai (CKPN) - *Stage* 2 Losses Allowance (ILA) - Stage 1	Cadangan Kerugian Penurunan Nilai (CKPN) - *Stage* 3 Allowance (ILA) - Stage 3	Tagihan yang Dihapus Buku Receivables Written Off	Economic Sector
			Belum Jatuh Tempo Not Due	Telah Jatuh Tempo Due					
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(2)
14.	Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Ketenagakerjaan, Agen Perjalanan, dan Penunjang Usaha Lainnya	947,538	72,688	1,262	2,000	9,243	359	-	Leasing and Leasing Activities Without Option Rights, Employment, Travel Agencies, and Other Business Supports
15.	Administrasi Pemerintahan, Pertahanan, dan Jaminan Sosial Wajib	-	-	-	-	-	-	-	Government Administration, Land Business, and Mandatory Social Service
16.	Pendidikan	130,546	31,314	2,406	422	3,837	680	-	Education
17.	Aktivitas Kesehatan Manusia dan Aktivitas Sosial	31,209	-	-	243	-	-	-	Human Health Activities and Social Activities
18.	Kesenian, Hiburan, dan Rekreasi	71,610	-	-	364	-	-	-	Arts, Entertainment, and Recreation
19.	Aktivitas Jasa Lainnya	-	-	-	-	-	-	-	Other Services Activities
20.	Aktivitas Rumah Tangga sebagai Pemberi Kerja; Aktivitas yang Menghasilkan Barang dan Jasa oleh Rumah Tangga yang Digunakan untuk Memenuhi Kebutuhan Sendiri	-	-	-	-	-	-	-	Household Activities as an Employer; Activities that Produce Goods and Services by Households that are Used to Meet Their Own Needs
21.	Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya	-	-	-	-	-	-	-	International Organizations and Other Extra International Organizations Activities
22.	Rumah Tangga	-	-	-				-	Household
23.	Bukan Lapangan Usaha	193,613	18,659	10,212	1,290	3,460	1,911	(10,611)	Non-Business
24.	Lainnya	1,183,389	-	-	-	-	-		Others
	Total	**28,376,162**	**1,164,222**	**714,087**	**112,806**	**333,699**	**128,368**	**(193,922)**	**Total**

*) Berdasarkan Surat Otoritas Jasa Keuangan No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi Atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi entitas anak PT Bank Victoria International Tbk.
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Pengungkapan Tagihan Berdasarkan Hari Tunggakan
Disclosure of Receivables by Due Date

1) Bank secara Individual / Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Jenis Eksposur	31 Desember 2024 31 December 2024				31 Desember 2023 31 December 2023				Exposure Type
		Tagihan Berdasarkan Hari Tunggakan Receivables by Due Date				Tagihan Berdasarkan Hari Tunggakan Receivables by Due Date				
		>90 Hari s.d. 120 Hari >90 Days to 120 Days	>120 Hari s.d. 180 Hari >120 Days to 180 Days	>180 Hari >180 Days	Total	>90 Hari s.d. 120 Hari >90 Days to 120 Days	>120 Hari s.d. 180 Hari >120 Days to 180 Days	>180 Hari >180 Days	Total	
a	b	c	d	e	f	c	d	e	f	b
1.	Kredit yang Termasuk dalam Tagihan yang Telah Jatuh Tempo	**5,000**	**5,103**	**605,929**	**616,032**	63,397	17,420	633,270	714,087	Loan Included in Due Receivables
2.	Surat Berharga yang Termasuk dalam Tagihan yang Telah Jatuh Tempo	**-**	**-**	**-**	**-**	-	-	-	-	Securities Included in Due Receivables
	Total	**5,000**	**5,103**	**605,929**	**616,032**	**63,397**	**17,420**	**633,270**	**714,087**	**Total**

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Pengungkapan Tambahan Terkait Perlakuan Terhadap Aset Bermasalah (CRB-A)
Additional Disclosures Regarding Treatment of Non-Performing Assets (CRB-A)

Pengungkapan Aset Performing dan *Non-Performing*
Disclosure of Performing and Non-Performing Assets

1) Bank secara Individual / Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Deskripsi	*Performing* (Kualitas L dan DPK) Performing (Quality of L and DPK)		Non-Performing (Kualitas KL, D, M) Non-Performing (Quality of KL,D, M)						Description
				Tagihan yang Mengalami Penurunan Nilai Impaired Receivables		Tagihan yang Tidak Mengalami Penurunan Nilai Non Impaired Receivables				
						Memiliki Tunggakan >90 Hari Have Arrears >90 Days		Memiliki Tunggakan ≤90 Hari Have Arrears ≤90 Days		
		Nilai Tercatat Bruto Gross Carrying Amount	CKPN	Nilai Tercatat Bruto Gross Carrying Amount	CKPN	Nilai Tercatat Bruto Gross Carrying Amount	CKPN	Nilai Tercatat Bruto Gross Carrying Amount	CKPN	
		a	b	c	d	e	f	g	h	
1.	Surat Berharga	7,463,989	1,266	-	-	-	-	-	-	Marketable Securities
2.	Kredit	19,886,642	258,746	673,218	188,220	-	-	-	-	Credit
	a. Korporasi	19,662,455	253,432	658,922	181,183	-	-	-	-	Corporate
	b. Ritel	224,188	5,313	14,295	7,037	-	-	-	-	Retail
3.	Transaksi Rekening Administratif	4,661,564	-	0	-	-	-	-	-	Administrative Account Transaction

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Pengungkapan Aset Restrukturisasi *Performing* dan Non-*Performing*
Disclosure of Performing and Non-Performing Restructuring Assets

1) Bank secara Individual / Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Deskripsi	*Performing* (Kualitas L dan DPK) Performing (Quality of L and DPK)		Non-*Performing* (Kualitas KL, D, M) Non-Performing (Quality of KL,D, M)		*Stage* 1		*Stage* 2		*Stage* 3		Description
		Nilai Tercatat Bruto Gross Carrying Amount	CKPN	Nilai Tercatat Bruto Gross Carrying Amount	CKPN	Nilai Tercatat Bruto Gross Carrying Amount	CKPN	Nilai Tercatat Bruto Gross Carrying Amount	CKPN	Nilai Tercatat Bruto Gross Carrying Amount	CKPN	
a	b	a	b	c	d	e	f	g	h	i	j	
1.	Surat Berharga	-	-	-	-	-	-	-	-	-	-	Marketable Securities
2.	Kredit	1,620,534	194,755	585,916	149,365	2,046,174	329,490	122,528	7,626	33,162	5,061	Credit
	a. Korporasi	1,591,057	189,442	581,031	147,480	2,016,005	324,657	120,914	7,446	30,584	4,316	Corporate
	b. Ritel	29,477	5,313	4,885	1,885	30,169	4,834	1,615	180	2,578	745	Retail
3.	Transaksi Rekening Administratif	69,191	-	-	-	18,292	-	50,871	-	28	-	Administrative Account Transaction

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Pengungkapan Kuantitatif Terkait Teknik MRK (CR3)
Disclosure of Quantitative Related to MRK Techniques (CR3)

1) Bank secara Individual / Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Deskripsi	Tagihan yang Tidak Dijamin dengan Teknik MRK Not Guaranteed Receivables Using MRK Techniques	Tagihan yang Dijamin dengan Teknik MRK Guaranteed Receivables Using MRK Techniques	Tagihan yang Dijamin dengan Agunan Guaranteed Receivables by Collateral	Tagihan yang Dijamin dengan Garansi, Penjaminan, dan/atau Asuransi Kredit Guaranteed Receivables by Guarantee, Security, and/or Credit Insurance	Tagihan yang Dijamin dengan Derivatif Kredit Receivables Secured by Credit Derivatives	Description
		a	b	c	d	e	
1.	Kredit	**18,796,481**	**1,551,316**	**1,551,316**	**-**		Credit
2.	Surat Berharga	**7,462,723**	**-**	**-**	**-**		Marketable Securities
3.	Total	**26,259,204**	**1,551,316**	**1,551,316**	**-**		Total
4.	Kredit dan Surat Berharga yang Telah Jatuh Tempo	**560,331**	**55,701**	**55,701**	**-**		Due Loans and Securities

2) Pengungkapan Tambahan / Additional Disclosure

1. Bank tidak memiliki eksposur kuantitatif terkait teknik MRK secara konsolidasi karena berdasarkan Surat Otoritas Jasa Keuangan No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi Entitas Anak PT Bank Victoria International Tbk.

1. The Bank does not have quantitative exposure related to MRK techniques on a consolidated basis due to based on Financial Services Authority Letter No. S-301/PB.101/2022 on Submission of the Decision on Permit to the Acquisition of PT Bank Victoria Syariah's Shares by PT Victoria Investama Tbk and Board of Directors' Decision Letter No. 113/DIR-EKS/12/22 on the Divestment Implementation Report on PT Bank Victoria International Tbk's (Bank) Self Initiative, therefore, PT Bank Victoria Syariah is no longer a subsidiary of PT Bank Victoria International Tbk.

Pengungkapan Eksposur Risiko Kredit dan Dampak Teknik MRK (CR4)
Disclosure of Credit Risk Exposure and Impact of MRK Techniques (CR4)

1) Bank secara Individual / Bank Individually

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

No.	Kategori Portofolio	Tagihan Bersih Sebelum Penerapan FKK dan Teknik MRK Net Receivables Before Implementation of FKK and MRK Techniques		Tagihan Bersih Setelah Penerapan FKK dan Teknik MRK Net Receivables After Implementation of FKK and MRK Techniques		ATMR dan Rata-Rata Bobot Risiko RWA and Risk Weight Average		Portfolio Category
		Laporan Posisi Keuangan Statements of Financial Position	TRA	Laporan Posisi Keuangan Statements of Financial Position	TRA	ATMR	Rata-Rata Bobot Risiko (e/(c+d)) Risk Weight Average (e/(c+d))	
		a	b	c	d	e	f	
1.	Tagihan kepada Pemerintah	6,111,398	-	6,111,398	-	-	0%	Receivables from Government
2.	Tagihan kepada Entitas Sektor Publik	789,967	635,000	789,967	168,500	307,592	32%	Receivables from Public Sector Entities
3.	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	-	53,157	-	53,157	26,578	50%	Receivables from Multilateral Development Banks and International Institutions
4.	Tagihan kepada Bank	1,647,371	10,461	1,647,371	4,184	460,099	28%	Receivables from Banks
	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lain[1)]	3,342,875	1,899,969	3,327,875	221,497	1,082,392	30%	Receivables from Securities Companies and Other Financial Services Institutions[1)]
5.	Tagihan berupa *Covered Bond*	-	-	-	-	-	0%	Receivables in the form of Covered Bond
6.	Tagihan kepada Korporasi - Eksposur Korporasi Umum[2)]	8,553,381	2,406,948	7,314,073	1,550,980	7,645,305	86%	Receivables from Corporations - General Corporate Exposure[2)]
	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lain[3)]	-	-	-	-	-	0%	Receivables from Securities Companies and Other Financial Services Institutions[3)]
	Eksposur Pembiayaan Khusus[4)]	-	-	-	-	-	0%	Special financing exposure[4)]
7.	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya	215,931	-	215,931		539,826	250%	Receivables in the from Subordinated Securities/ Receivables, Equity, and Other Capital Instruments
8.	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel	2,413,356	760,111	1,923,052	304,044	1,893,032	85%	Receivables from Microbusiness, Small Business, and Retail Portfolio

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

No.	Kategori Portofolio	Tagihan Bersih Sebelum Penerapan FKK dan Teknik MRK Net Receivables Before Implementation of FKK and MRK Techniques		Tagihan Bersih Setelah Penerapan FKK dan Teknik MRK Net Receivables After Implementation of FKK and MRK Techniques		ATMR dan Rata-Rata Bobot Risiko RWA and Risk Weight Average		Portfolio Category
		Laporan Posisi Keuangan Statements of Financial Position	TRA	Laporan Posisi Keuangan Statements of Financial Position	TRA	ATMR	Rata-Rata Bobot Risiko (e/(c+d)) Risk Weight Average (e/(c+d))	
		a	b	c	d	e	f	
9.	Kredit Beragun Properti						0%	Property Collateralized Loans
	Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Tidak Bergantung secara Material pada Arus Kas Properti	150,868	-	150,868	-	74,430	49%	Residential Property Collateralized Loans which the Payments are Not Materially Dependent on Property Cash Flow
	Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Bergantung secara Material pada Arus Kas Properti	-	-	-	-	-	0%	Residential Property Collateralized Loans which the Payments are Materially Dependent on Property Cash Flow
	Kredit Beragun Properti Komersial yang Pembayarannya Tidak Bergantung secara Material pada Arus Kas Properti	-	-	-	-	-	0%	Commercial Property Collateralized Loans which the Payments are Not Materially Dependent on Property Cash Flow
	Kredit Beragun Properti Komersial yang Pembayarannya Bergantung secara Material pada Arus Kas Properti	2,919,842	575,368	2,919,842	230,147	2,802,719	89%	Commercial Property Collateralized Loans which the Payments are Materially Dependent on Property Cash Flow
10.	Kredit Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi	-	-	-	-	-	0%	Land Acquisition, Land Processing, and Construction Loans
11.	Tagihan yang Telah Jatuh Tempo	585,719	-	585,719	-	792,605	135%	Due Receivables
12.	Aset Lainnya	1,183,389	-	1,183,389	-	1,365,877	115%	Other Assets
	Total	27,914,096	6,341,014	26,169,485	2,532,510	16,990,456	59%	**Total**

2) Pengungkapan Tambahan / Additional Disclosure

1. Bank tidak memiliki eksposur risiko kredit dan dampak teknik MRK secara konsolidasi karena berdasarkan Surat Peraturan Otoritas Jasa Keuangan No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi Atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi entitas anak PT Bank Victoria International Tbk.

1. The Bank has no exposure to credit risk and the impact of MRK techniques on a consolidated basis due to based on Financial Services Authority Letter No. S-301/PB.101/2022 on Submission of the Decision on Permit to the Acquisition of PT Bank Victoria Syariah's Shares by PT Victoria Investama Tbk and Board of Directors' Decision Letter No. 113/DIR-EKS/12/22 on the Divestment Implementation Report on PT Bank Victoria International Tbk's (Bank) Self Initiative, therefore, PT Bank Victoria Syariah is no longer a subsidiary of PT Bank Victoria International Tbk.

Pengungkapan Eksposur Berdasarkan Kelas Aset dan Bobot Risiko (CR5)
Disclosure of Exposure by Asset Class and Risk Weight (CR5)

1) Bank secara Individual / Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio Portfolio Category	0%	20%	50%	100%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
1.	Tagihan kepada Pemerintah Receivables from Government	6,111,398	-	-	-	-		6,111,398

No.	Kategori Portofolio Portfolio Category	20%	50%	100%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
2.	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	897,174	153,748	-	-	-	1,050,922

No.	Kategori Portofolio Portfolio Category	0%	20%	30%	50%	100%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
3.	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	-	-	-	53,157	-	-		53,157

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio Portfolio Category	20%	30%	40%	50%	75%	100%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
	Tagihan kepada Bank Receivables from Banks	285,247	-	14,005	-	-	-	-	-	299,252
4.	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya[1] Receivables from Securities Companies and Other Financial Services Institutions[1]	2,126,119	752,167	823,638	17,706	-	-	-	-	3,719,629

No.	Kategori Portofolio Portfolio Category	10%	15%	20%	25%	35%	50%	100%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
5.	Tagihan berupa *Covered Bond* Receivables in the form of Covered Bond	-	-	-	-	-	-	-		-

No.	Kategori Portofolio Portfolio Category	20%	50%	65%	75%	80%	85%	100%	130%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
6.	Tagihan kepada Korporasi Umum[2] Receivables from General Corporations[2]	753,715	1,660,658	-	174,151	-	1,218,601	7,341,672	-	-	-	11,148,796
	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lain[3] Receivables from Securities Companies and Other Financial Services Institutions[3]	-	-	-	-		-	-		-	-	0
	Eksposur Pembiayaan Khusus[4] Special Financing Exposure[4]	-	-		-	-		-	-	-	-	0

No.	Kategori Portofolio Portfolio Category	100%	150%	250%	400%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
7.	Tagihan kepada Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity, and Other Capital Instruments	-	-	219,934	-	-	219,934

No.	Kategori Portofolio Portfolio Category	45%	75%	85%	100%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
8.	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	-	-	2,147,423	-	-	2,147,423

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio Portfolio Category	0%[5]	20%	25%	30%	35%	40%	45%	50%	60%	65%[5]	70%	75%	85%	90%	100%	105%	110%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
9.	Kredit Beragun Properti Property Collateralized Loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Tidak Bergantung Secara Material pada Arus Kas Properti Residential Property Collateralized Loans which the Payments are Not Materially Dependent on Property Cash Flow	-	18,745	9,365	38,697		5,169		2,721		-	75,861	-	-		-			-	-	150,558
	Tanpa Pendekatan Pembagian Kredit[5] Without Loan Sharing Approach[5]	-	-	-	-		-		-		-	-	-	-		-			-	-	-
	Dengan Menggunakan Pendekatan Pembagian Kredit (Dijamin)[5] Using a Loan Sharing Approach (Guaranteed)[5]		-																	-	-

No.	Kategori Portofolio Portfolio Category	0%[5]	20%	25%	30%	35%	40%	45%	50%	60%	65%[5]	70%	75%	85%	90%	100%	105%	110%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
	Dengan Menggunakan Pendekatan Pembagian Kredit (Dijamin)[6] Using a Loan Sharing Approach (Guaranteed)[6]	-	-		-		-		-		-		-	-		-			-	-	-
	Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Bergantung Secara Material pada Arus Kas Properti Residential Property Collateralized Loans which the Payments are Materially Dependent on Property Cash Flow					-		-									-			-	-
	Kredit Beragun Properti Komersial yang Pembayarannya Tidak Bergantung Secara Material pada Arus Kas Properti Commercial Property Collateralized Loans which the Payments are Not Materially Dependent on Property Cash Flow	-	-		-		-		-		-		-	-		-			-	-	-

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio Portfolio Category	0%[5]	20%	25%	30%	35%	40%	45%	50%	60%	65%[5]	70%	75%	85%	90%	100%	105%	110%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
	Tanpa Pendekatan Pembagian Kredit[5] Without Loan Sharing Approach[5]	-	-		-		-		-	-										-	-
	Dengan Menggunakan Pendekatan Pembagian Kredit (Dijamin)[5] Using A Loan Sharing Approach (Guaranteed)[5]									-										-	-
	Dengan Menggunakan Pendekatan Pembagian Kredit (Dijamin)[5] Using A Loan Sharing Approach (Guaranteed)[5]	-	-		-		-		-		-		-	-		-			-	-	-
	Kredit Beragun Properti Komersial yang Pembayarannya Bergantung Secara Material pada Arus Kas Properti Commercial Property Collateralized Loans which the Payments are Materially Dependent on Property Cash Flow											**1,079,726**			**739,603**			**1,685,375**	-	-	**3,504,704**

No.	Kategori Portofolio Portfolio Category	0%[5]	20%	25%	30%	35%	40%	45%	50%	60%	65%[5]	70%	75%	85%	90%	100%	105%	110%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
	Kredit Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi[5] Land Acquisition, Land Processing, and Construction Loans[5]															-			-	-	-

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio Portfolio Category	50%	100%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
10.	Tagihan yang Telah Jatuh Tempo Due Receivables	6,763	329,956	108,431	-	445,151

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio Portfolio Category	0%	20%	100%	150%	1,250%[5]	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
11.	Aset Lainnya Other Assets	71,600	-	593,276	378,984	-	-	1,043,860

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

No.	Bobot Risiko Risk Weight	Tagihan Bersih Laporan Posisi Keuangan Net Receivables Statement of Financial Position	Tagihan Bersih TRA (Sebelum Pengenaan FKK) Net Receivables TRA (before FKK imposition)	Rata - Rata FKK FKK Average	Tagihan Bersih (Setelah Pengenaan FKK dan Teknik MRK) Net Receivables (After FKK and MRK Techniques)
1.	<40%	**11,885,390**	**1,647,500**	**22%**	**12,050,140**
2.	40% - 70%	**3,616,587**	**1,145,683**	**45%**	**3,842,517**
3.	75%	**174,151**	**-**	**0%**	**174,151**
4.	85%	**2,718,787**	**2,486,157**	**53%**	**3,366,024**
5.	90% - 100%	**9,848,310**	**5,842**	**40%**	**9,004,506**
6.	105% - 130%	**1,658,255**	**67,800**	**40%**	**1,685,375**
7.	150%	**487,416**	**-**	**0%**	**487,416**
8.	250%	**219,934**	**-**	**0%**	**219,934**
9.	400%	**-**	**-**	**0%**	**-**
10.	1,250%	**-**	**-**	**0%**	**-**
11.	**Total Tagihan Bersih** **Total Net Receivables**	**30,608,829**	**5,352,982**	**20%**	**30,830,062**

2) Pengungkapan Tambahan / Additional Disclosure

1. Bank tidak memiliki eksposur risiko kredit dan dampak teknik MRK secara konsolidasi karena berdasarkan Surat Otoritas Jasa Keuangan No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi Entitas Anak PT Bank Victoria International Tbk.

1. The Bank has no exposure to credit risk and the impact of MRK techniques on a consolidated basis due to based on Financial Services Authority Letter No. S-301/PB.101/2022 on Submission of the Decision on Permit to the Acquisition of PT Bank Victoria Syariah's Shares by PT Victoria Investama Tbk and Board of Directors' Decision Letter No. 113/DIR-EKS/12/22 on the Divestment Implementation Report on PT Bank Victoria International Tbk's (Bank) Self Initiative, therefore, PT Bank Victoria Syariah is no longer a subsidiary of PT Bank Victoria International Tbk.

Tabel Pengungkapan Analisis Eksposur Counterparty Credit Risk (CCR1)
Table of Disclosure of Exposure Analysis of Counterparty Credit Risk (CCR1)

Bank tidak memiliki eksposur *Counterparty Credit Risk* (CCR1).
The Bank has no exposure of Counterparty Credit Risk (CCR1).

Tabel Pengungkapan Eksposur CCR Berdasarkan Kategori Portofolio dan Bobot Risiko (CCR3)

Table CCR Exposure by Portfolio Category and Risk Weight (CCR3)

(dalam juta Rupiah / in million Rupiah)

Bobot Risiko / Kategori Portofolio	31 Desember 2024 / 31 December 2024									Risk Weight / Portfolio Category
	a	b	c	d	e	f	g	h	i	
	0%	10%	20%	50%	75%	100%	150%	Lainnya Other	Total Tagihan Bersih Total Net Receivables	
Indonesia	-	-	-	-	-	-	-	-	-	Indonesia
Tagihan kepada Pemerintah dan Bank Sentral	-	-	-	-	-	-	-	-	-	Claims against Government and Central Bank
Tagihan kepada Entitas Sektor Publik	-	-	-	-	-	-	-	-	-	Claims against Public Sector Entities
Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	-	-	-	-	-	-	-	-	-	Claims against Multilateral Development Banks and International Institutions
Tagihan kepada Bank Lain	-	-	**197,776**	-	-	-	-	-	**197,776**	Receivables from Other Banks
Tagihan berupa *Covered Bond*	-	-	-	-	-	-	-	-	-	Receivables in the form of Covered Bond
Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya	-	-	-	-	-	-	-	-	-	Receivables from Securities Companies and Other Financial Services Institutions
Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya	-	-	-	-	-	-	-	-	-	Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments
Kredit Beragunan Properti Rumah Tinggal	-	-	-	-	-	-	-	-	-	Residential Property Collateralized Loans
Kredit Beragunan Properti Komersial	-	-	-	-	-	-	-	-	-	Commercial Property Collateralized Loans
Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi	-	-	-	-	-	-	-	-	-	Loan by Land Acquisition, Land Processing, and Construction
Kredit Pegawai/Pensiunan	-	-	-	-	-	-	-	-	-	Employee/Retirement Loans
Tagihan kepada Korporasi	-	-	-	-	-	-	-	-	-	Receivables from Corporations

(dalam juta Rupiah / in million Rupiah)

Bobot Risiko / Kategori Portofolio	31 Desember 2024 / 31 December 2024									Risk Weight / Portfolio Category
	a	b	c	d	e	f	g	h	i	
	0%	10%	20%	50%	75%	100%	150%	Lainnya Other	Total Tagihan Bersih Total Net Receivables	
Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel	-	-	-	-	-	-	-	-	-	Receivables from Microbusiness, Small Business, and Retail Portfolio
Tagihan yang Telah Jatuh Tempo	-	-	-	-	-	-	-	-	-	Due Receivables
Aset lainnya	-	-	-	-	-	-	-	-	-	Other Assets
Total	-	-	**197,776**	-	-	-	-	-	**197,776**	**Total**

(dalam juta Rupiah / in million Rupiah)

Bobot Risiko / Kategori Portofolio	31 Desember 2023 / 31 December 2023									Risk Weight / Portfolio Category
	a	b	c	d	e	f	g	h	i	
	0%	10%	20%	50%	75%	100%	150%	Lainnya Other	Total Tagihan Bersih Total Net Receivables	
Indonesia	-	-	-	-	-	-	-	-	-	Indonesia
Tagihan kepada Pemerintah dan Bank Sentral	-	-	-	-	-	-	-	-	-	Claims against Government and Central Bank
Tagihan kepada Entitas Sektor Publik	-	-	-	-	-	-	-	-	-	Claims against Public Sector Entities
Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	-	-	-	-	-	-	-	-	-	Claims against Multilateral Development Banks and International Institutions
Tagihan kepada Bank Lain	-	-	637,703	-	-	-	-	-	637,703	Receivables from Other Banks
Tagihan berupa *Covered Bond*	-	-	-	-	-	-	-	-	-	Receivables in the form of Covered Bond
Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya	-	-	-	-	-	-	-	-	-	Receivables from Securities Companies and Other Financial Services Institutions

Bobot Risiko / Kategori Portofolio	31 Desember 2023 / 31 December 2023									Risk Weight / Portfolio Category
	a	b	c	d	e	f	g	h	i	
	0%	10%	20%	50%	75%	100%	150%	Lainnya Other	Total Tagihan Bersih Total Net Receivables	
Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya	-	-	-	-	-	-	-	-	-	Receivables in the form of Subordinated Securities/ Receivables, Equity, and Other Capital Instruments
Kredit Beragunan Properti Rumah Tinggal	-	-	-	-	-	-	-	-	-	Residential Property Collateralized Loans
Kredit Beragunan Properti Komersial	-	-	-	-	-	-	-	-	-	Commercial Property Collateralized Loans
Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi	-	-	-	-	-	-	-	-	-	Loan by Land Acquisition, Land Processing, and Construction
Kredit Pegawai/Pensiunan	-	-	-	-	-	-	-	-	-	Employee/Retirement Loans
Tagihan kepada Korporasi	-	-	-	-	-	-	-	-	-	Receivables from Corporations
Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel	-	-	-	-	-	-	-	-	-	Receivables from Microbusiness, Small Business, and Retail Portfolio
Tagihan yang Telah Jatuh Tempo	-	-	-	-	-	-	-	-	-	Due Receivables
Aset lainnya	-	-	-	-	-	-	-	-	-	Other Assets
Total	**-**	**-**	**637,703**	**-**	**-**	**-**	**-**	**-**	**637,703**	**Total**

Tabel Pengungkapan Tagihan Bersih Derivatif Kredit (CCR6)
Table of Disclosure of Net Receivables of Credit Derivative (CCR6)

Bank tidak memiliki eksposur Derivatif Kredit (CCR6)
The Bank has no Credit Derivative Exposure (CCR6)

Tabel Eksposur Sekuritisasi pada *Banking Book* (Tabel SEC1)
Disclosure of Securitization Exposures in the Banking Book (Tabel SEC1)

1) Bank secara Individual / Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2024 31 December 2024									Portofolio Category
		a	b	c	e	f	g	i	j	k	
		Bank sebagai Originator Bank as Originator			Bank sebagai Sponsor Bank as Sponsor			Bank sebagai Investor Bank as Investor			
		Tradisional Traditional	Sintetis Synthetic	Subtotal	Tradisional Traditional	Sintetis Synthetic	Subtotal	Tradisional Traditional	Sintetis Synthetic	Subtotal	
1.	Ritel (Total) – Antara Lain	-	-	-	-	-	-	**1,011**	-	**1,011**	Retail (Total) - Among Others
2.	Kredit Perumahan	-	-	-	-	-	-	**1,011**	-	**1,011**	Housing Loans
3.	Kartu Kredit	-	-	-	-	-	-	-	-	-	Credit Cards
4.	Eksposur Ritel Lainnya	-	-	-	-	-	-	-	-	-	Other Retail Exposures
5.	Re-Sekuritisasi	-	-	-	-	-	-	-	-	-	Re-Securitization
6.	Non-Ritel (Total) – Antara Lain	-	-	-	-	-	-	-	-	-	Non-Retail (Total) - Among Others
7.	Kredit Korporasi	-	-	-	-	-	-	-	-	-	Corporate Loans
8.	Kredit Komersil	-	-	-	-	-	-	-	-	-	Commercial Credit
9.	Sewa dan Piutang	-	-	-	-	-	-	-	-	-	Rent and Accounts Receivable
10.	Non-Ritel Lainnya	-	-	-	-	-	-	-	-	-	Other Non-Retail
11.	Re-Sekuritisasi	-	-	-	-	-	-	-	-	-	Re-Securitization

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2023 31 December 2023									Portofolio Category
		a	b	c	e	f	g	i	j	k	
		Bank sebagai Originator Bank as Originator			Bank sebagai Sponsor Bank as Sponsor			Bank sebagai Investor Bank as Investor			
		Tradisional Traditional	Sintetis Synthetic	Subtotal	Tradisional Traditional	Sintetis Synthetic	Subtotal	Tradisional Traditional	Sintetis Synthetic	Subtotal	
1.	Retail (Total) – Antara Lain	-	-	-	-	-	-	8,593	-	8,593	Retail (Total) - Among Others
2.	Kredit Perumahan	-	-	-	-	-	-	8,593	-	8,593	Housing Loans
3.	Kartu Kredit	-	-	-	-	-	-	-	-	-	Credit Cards
4.	Eksposur Ritel Lainnya	-	-	-	-	-	-	-	-	-	Other Retail Exposures
5.	Re-Sekuritisasi	-	-	-	-	-	-	-	-	-	Re-Securitization
6.	Non-Retail (Total) – Antara Lain	-	-	-	-	-	-	-	-	-	Non-Retail (Total) - Among Others
7.	Kredit Korporasi	-	-	-	-	-	-	-	-	-	Corporate Loans
8.	Kredit Komersil	-	-	-	-	-	-	-	-	-	Commercial Credit
9.	Sewa dan Piutang	-	-	-	-	-	-	-	-	-	Rent and Accounts Receivable
10.	Non-Retail Lainnya	-	-	-	-	-	-	-	-	-	Other Non-Retail
11.	Re-Sekuritisasi	-	-	-	-	-	-	-	-	-	Re-Securitization

Analisis Kualitatif
Qualitative Analysis

Bank melakukan investasi pada pihak ketiga (produk EBA) yang mempunyai peringkat *investment grade* AAA s.d AA- sebagai upaya untuk mendiversifikasi risiko likuiditas (*liquidity facility*) dan *return*.
Bank invests in third parties (ABS products) with investment grade ratings of AAA to AA- as an effort to diversify liquidity risk (liquidity facility) and returns.

Tabel Eksposur Sekuritisasi pada *Trading Book* (Tabel SEC2)
Table of Securitization Exposure in the Trading Book (Table SEC2)

Bank tidak memiliki eksposur sekuritisasi pada *trading book*.
The Bank has no securitization exposure in the trading book.

Tabel Eksposur Sekuritisasi pada Banking Book dan Terkait Persyaratan Modalnya – Bank yang Bertindak sebagai Originator atau Sponsor (SEC3)
Table of Securitization Exposure in the Banking Book and Related to its Capital Requirements – Bank Acting as Originator or Sponsor (SEC3)

Bank tidak memiliki eksposur sekuritisasi pada *Banking Book* sebagai Originator atau Sponsor.
The Bank has no securitization exposure in the Banking Book as Originator or Sponsor.

Tabel Eksposur Sekuritisasi pada *Banking Book* dan Persyaratan Modalnya – Bank yang Bertindak sebagai Investor (SEC4)

Table of Securitization Exposure in Banking Book and Related to Its Capital Requirements – Bank Acting as Investor (SEC4)

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2024 31 December 2024																	Portofolio Category
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	
		Nilai Eksposur (Berdasarkan Bobot Risiko) Exposure Value (Based on Risk Weight)					Nilai Eksposur (Berdasarkan *Regulatory Approach*) Exposure Value (Based on Regulatory Approach)				ATMR (Berdasarkan *Regulatory Approach*) ATMR (Based on Regulatory Approach)				*Capital Charge After Cap*				
		≤20% Bobot Risiko ≤20% Risk Weighted	>20% to 50% Bobot Risiko >20% to 50% Risk Weighted	>50% to 100% Bobot Risiko >50% to 100% Risk Weighted	>100% to <1.250 % Bobot Risiko >100% to <1,250% Risk Weighted	1.250% Bobot Risiko 1,250% Risk Weighted	IRB RBA	IRB SFA	SA/ SSFA	1,250%	IRB RBA	IRB SFA	SA/ SSFA	1,250%	IRB RBA	IRB SFA	SA/ SSFA	1,250%	
1.	Total Eksposur	**1,011**	-	-	-	-		-	**1,011**	-		-	**202**	-		-	**202**	-	Total Exposure
2.	Sekuritisasi Tradisional	**1,011**	-	-	-	-		-	**1,011**	-		-	**202**	-		-	**202**	-	Traditional Securitization
3.	Dimana *Underlying* Sekuritisasi	**1,011**	-	-	-	-		-	**1,011**	-		-	**202**	-		-	**202**	-	In which the Underlying Securitization
4.	Ritel	**1,011**	-	-	-	-		-	**1,011**	-		-	**202**	-		-	**202**	-	Retail
5.	Non-ritel	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Non-Retail
6.	Dimana Re-Sekuritisasi	-	-	-	-	-		-	-	-		-	-	-		-	-	-	In which Re-Securitization
7.	Senior	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Senior
8.	Non-Senior	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Non-Senior
9.	Sekuritisasi Sintetis	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Synthetic Securitization
10.	Dimana *Underlying* Sekuritisasi	-	-	-	-	-		-	-	-		-	-	-		-	-	-	In which the Underlying Securitization
11.	Ritel	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Retail
12.	Non-Ritel	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Non-Retail
13.	Dimana Re-Sekuritisasi	-	-	-	-	-		-	-	-		-	-	-		-	-	-	In which Re-Securitization
14.	Senior	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Senior
15.	Non-Senior	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Non-Senior

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2023 31 December 2023																	Portofolio Category
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	
		Nilai Eksposur (Berdasarkan Bobot Risiko) Exposure Value (Based on Risk Weight)					Nilai Eksposur (Berdasarkan *Regulatory Approach*) Exposure Value (Based on Regulatory Approach)				ATMR (Berdasarkan *Regulatory Approach*) ATMR (Based on Regulatory Approach)				*Capital Charge After Cap*				
		≤20% Bobot Risiko ≤20% Risk Weighted	>20% to 50% Bobot Risiko >20% to 50% Risk Weighted	>50% to 100% Bobot Risiko >50% to 100% Risk Weighted	>100% to <1.250 % Bobot Risiko >100% to <1,250% Risk Weighted	1.250% Bobot Risiko 1,250% Risk Weighted	IRB RBA	IRB SFA	SA/ SSFA	1,250%	IRB RBA	IRB SFA	SA/ SSFA	1,250%	IRB RBA	IRB SFA	SA/ SSFA	1,250%	
1.	Total Eksposur	8,593	-	-	-	-		-	8,593	-		-	1,719	-		-	1,719	-	Total Exposure
2.	Sekuritisasi Tradisional	8,593	-	-	-	-		-	8,593	-		-	1,719	-		-	1,719	-	Traditional Securitization
3.	Dimana *Underlying* Sekuritisasi	8,593	-	-	-	-		-	8,593	-		-	1,719	-		-	1,719	-	In which the Underlying Securitization
4.	Ritel	8,593	-	-	-	-		-	8,593	-		-	1,719	-		-	1,719	-	Retail
5.	Non-Ritel	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Non-Retail
6.	Dimana Re-Sekuritisasi	-	-	-	-	-		-	-	-		-	-	-		-	-	-	In which Re-Securitization
7.	Senior	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Senior
8.	Non-Senior	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Non-Senior
9.	Sekuritisasi Sintetis	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Synthetic Securitization
10.	Dimana *Underlying* Sekuritisasi	-	-	-	-	-		-	-	-		-	-	-		-	-	-	In which the Underlying Securitization
11.	Ritel	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Retail
12.	Non-Ritel	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Non-retail
13.	Dimana Re-Sekuritisasi	-	-	-	-	-		-	-	-		-	-	-		-	-	-	In which Re-Securitization
14.	Senior	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Senior
15.	Non-Senior	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Non-Senior

Analisis Kualitatif Qualitative Analysis
Untuk eksposur sekuritisasi pada *banking book*, perhitungan ATMR risiko kredit dilakukan dengan menggunakan pendekatan standar (*standardized approach*), dimana sekuritisasi tersebut memiliki *investment grade* AAA s.d AA- yang memiliki bobot 20% pada perhitungan ATMR. For securitization exposure in the banking book, credit risk RWA is calculated by using a standardized approach, in which the securitization has investment grade of AAA to AA- with a 20% weight in RWA calculation.

Tabel Pengungkapan Risiko Pasar dengan Menggunakan Metode Standar
Table of Disclosure of Market Risk Using Standardized Method

1) Bank secara Individual / Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Risiko	Beban Modal Pendekatan Standar Desember 2024 Standard Approach Capital Expenses December 2024	Risk
1.	Risiko GIRR	**20**	GIRR Risk
2.	Risiko CSR Non-Sekuritisasi	**0**	CSR Risk Non-Securitization
3.	Risiko CSR Sekuritisasi Non-CTP	**-**	CSR Risk Securitization Non-CTP
4.	Risiko CSR Sekuritisasi CTP	**-**	CSR Risk Securitization CTP
5.	Risiko Ekuitas	**-**	Equity Risk
6.	Risiko Komoditas	**-**	Commodity Risk
7.	Risiko Nilai Tukar	**62,393**	Exchange Rate Risk
8.	DRC - Non-sekuritisasi	**-**	DRC - Non-Securitization
9.	DRC - Sekuritisasi Non-CTP	**-**	DRC - Securitization Non-CTP
10.	DRC - Sekuritisasi CTP	**-**	DRC - Securitization CTP
11.	RRAO	**-**	RRAO
12.	**Total**	**62,414**	**Total**

Tabel *Interest Rate Risk in Banking Book* - Laporan Penerapan Manajemen Risiko untuk IRRBB
Table of Interest Rate Risk in the Banking Book - Report on Risk Management Implementation for IRRBB

Bank berada dalam Buku 2 (Kelompok Bank Modal Inti/KBMI 1, berdasarkan Peraturan Otoritas Jasa Keuangan No. 12/POJK.03/2021) dan tidak memenuhi kriteria untuk mengungkapkan laporan perhitungan *Interest Rate Risk in Banking Book* (IRRBB) sesuai Surat Edaran Otoritas Jasa Keuangan No. 12/SEOJK.03/2018 tanggal 21 Agustus 2018 tentang Penerapan Manajemen Risiko dan Pengukuran Risiko Pendekatan Standar untuk Risiko Suku Bunga dalam *Banking Book* (IRRBB) bagi Bank Umum. Dalam hal mengendalikan risiko suku bunga pada *banking book*, Bank menggunakan analisa sensitivitas berdasarkan *maturity gap* yang disusun dalam rangka pemenuhan ketentuan mengenai penilaian tingkat kesehatan Bank Umum dan penerapan manajemen risiko bagi Bank Umum. Parameter tersebut dapat memberikan indikasi atas risiko terhadap perspektif nilai ekonomis dan perspektif pendapatan Bank yang timbul dari pergerakan skenario suku bunga dalam kondisi *shock* yang mempengaruhi posisi *banking book* pada Bank.

The Bank is in BUKU 2 group (Core Capital Bank Group/KBMI 1, based on Financial Services Authority Regulation No. 12/POJK.03/2021) and does not meet the criteria for disclosing a report on the calculation of Interest Rate Risk in Banking Book (IRRBB) according to Financial Services Authority Circular No. 12/SEOJK.03/2018 dated 21 August 2018 on Implementation of Risk Management and Standard Approach for Risk Measurement for Interest Rate Risk in the Banking Book (IRRBB) for Commercial Banks. In terms of controlling interest rate risk in the banking book, the Bank uses a sensitivity analysis based on a maturity gap which is prepared in order to comply with the provisions on assessment of soundness level of Commercial Banks and the implementation of risk management for Commercial Banks. These parameters can provide an indication of risks to the economic value perspective and the Bank's income perspective arising from fluctuations in interest rate scenarios under shock conditions that affect the banking book position at the Bank.

Tabel *Interest Rate Risk in Banking Book* - Laporan Perhitungan IRRBB
Table of Interest Rate Risk in Banking Book - IRRBB Calculation Report

Bank kelompok BUKU 2 (Kelompok Bank Modal Inti/KBMI 1, berdasarkan Peraturan Otoritas Jasa Keuangan No. 12/POJK.03/2021) dan tidak mengungkapkan laporan perhitungan *Interest Rate Risk in Banking Book* (IRRBB) sebagaimana diatur didalam Surat Edaran Otoritas Jasa Keuangan No. 12/SEOJK.03/2018.

The Bank is in BUKU 2 group (Core Capital Bank Group/KBMI 1, based on Financial Services Authority Regulation No. 12/POJK.03/2021) and does not report the calculation of Interest Rate Risk in Banking Book (IRRBB) as stipulated in the Financial Services Authority Circular No. 12/SEOJK.03/2018.

Tabel Pengungkapan Risiko Likuiditas
Table of Disclosure of Liquidity Risk

Pengungkapan Laporan Perhitungan Rasio Kecukupan Likuiditas (LCR)
Disclosure of Liquidity Coverage Ratio (LCR) Calculation Report

Nama Bank : PT Bank Victoria International Tbk
Bank Name
Posisi Laporan : Desember 2024
Reporting Position : December 2024

(dalam juta Rupiah / in million Rupiah)

No.	Komponen	Individual Individually Posisi Tanggal Laporan Reporting Date Position Nilai *Outstanding* Kewajiban dan Komitmen/Nilai Tagihan Kontraktual Outstanding Value of Liabilities and Commitments/Contractual Receivables Value	Individual Individually Posisi Tanggal Laporan Reporting Date Position Nilai HQLA setelah Pengurangan Nilai (*Haircut*), *Outstanding* Kwajiban dan Komitmen Dikalikan Tingkat Penarikan (*Run-Off Rate*) atau Nilai Tagihan Kontraktual Dikalikan Tingkat Penerimaan (*Inflow Rate*) HQLA Value Less Haircut, Outstanding Liabilities and Commitments Multiplied by Run-Off Rate or Contractual Receivables Value Multiplied by Inflow Rate	Component
1.	Jumlah Data Poin yang Digunakan dalam Perhitungan LCR		**20 hari** 20 day	Number of Data Points Used in the LCR Calculation
***High Quality Liquid Asset* (HQLA)**				
2.	Total *High Quality Liquid Asset* (HQLA)		**7,130,371.22**	Total High Quality Liquid Asset (HQLA)
Arus Kas Keluar (*Cash Outflow*) **Cash Outflows**				
3.	Simpanan Nasabah Perorangan dan Pendanaan yang Berasal dari Nasabah Usaha Mikro dan Usaha Kecil, Terdiri dari:	**7,969,573.91**	**787,788.74**	Savings from Individual Customers and Funding Derived from Micro and Small Business Customers, Consisting of:
	a. Simpanan/Pendanaan Stabil	**183,372.92**	**9,168.65**	Savings/Funding is Stable
	b. Simpanan/Pendanaan Kurang Stabil	**7,786,200.99**	**778,620.10**	Savings/Funding is Less Stable

(dalam juta Rupiah / in million Rupiah)

No.	Komponen	Individual Individually Posisi Tanggal Laporan Reporting Date Position Nilai *Outstanding* Kewajiban dan Komitmen/Nilai Tagihan Kontraktual Outstanding Value of Liabilities and Commitments/Contractual Receivables Value	Individual Individually Posisi Tanggal Laporan Reporting Date Position Nilai HQLA setelah Pengurangan Nilai (*Haircut*), *Outstanding* Kwajiban dan Komitmen Dikalikan Tingkat Penarikan (*Run-Off Rate*) atau Nilai Tagihan Kontraktual Dikalikan Tingkat Penerimaan (*Inflow Rate*) HQLA Value Less Haircut, Outstanding Liabilities and Commitments Multiplied by Run-Off Rate or Contractual Receivables Value Multiplied by Inflow Rate	Component
4.	Pendanaan yang Berasal dari Nasabah Korporasi, Terdiri dari:	**6,806,202.88**	**3,456,436.31**	Funding Derived from Corporate Customers, Consisting of:
	a. Simpanan Operasional	**864,738.75**	**206,700.03**	Operational Savings
	b. Simpanan Non-Operasional dan/atau Kewajiban Lainnya yang Bersifat Non-Operasional	**5,941,464.13**	**3,249,736.28**	Non-Operational Deposits and/or Other Non-Operational Liabilities
	c. Surat Berharga berupa Surat Utang yang Diterbitkan oleh Bank (*Unsecured Debt*)	**0.00**	**0.00**	Securities in the Form of Debt Securities Issued by Banks
5.	Pendanaan dengan Agunan (*Secured Funding*)		**0.00**	Funding with Collateral (Secured Funding)
6.	Arus Kas Keluar Lainnya (*Additional Requirement*), Terdiri dari:	**693,708.16**	**58,607.46**	Other Cash Outflows (Additional Requirements), Consisting of:
	a. Arus Kas Keluar atas Transaksi Derivatif	**2,715.56**	**2,715.56**	Cash Outflows From Derivative Transactions
	b. Arus Kas Keluar atas Peningkatan Kebutuhan Likuiditas	**0.00**	**0.00**	Cash Outflows From Increased Liquidity Needs
	c. Arus Kas Keluar atas Kehilangan Pendanaan	**0.00**	**0.00**	Cash Outflows for Loss of Funding
	d. Arus Kas Keluar atas Penarikan Komitmen Fasilitas Kredit dan Fasilitas Likuiditas	**422,037.89**	**53,818.84**	Cash Outflows for Withdrawal of Committed Credit Facilities and Liquidity Facilities
	e. Arus Kas Keluar atas Kewajiban Kontraktual Lainnya terkait Penyaluran Dana	**0.00**	**0.00**	Cash Outflows on Other Contractual Liabilities Related to Distribution of Funds
	f. Arus Kas Keluar atas Kewajiban Kontingensi Pendanaan Lainnya	**268,954.72**	**2,073.07**	Cash Outflows from Other Funding Contingent Liabilities
	g. Arus Kas Keluar Kontraktual Lainnya	**0.00**	**0.00**	Other Contractual Cash Outflows
7.	**Total Arus Kas Keluar (*Cash Outflow*)**		**4,302,832.51**	**Total Cash Outflows**
Arus Kas Masuk (*Cash Inflow*) Cash Inflow				
8.	Pinjaman dengan Agunan *Secured Lending*	**10,409.26**	**0.00**	Loans with Collateral Secured Lending
9.	Tagihan Berasal dari Pihak Lawan (*Counterparty*) yang Bersifat Lancar (*Inflows from Fully Performing Exposures*)	**601,234.94**	**217,084.86**	Inflows from Fully performing Exposures Coming from Counterparty
10.	Arus Kas Masuk Lainnya	**749.73**	**749.73**	Other Cash Inflows
11.	**Total Arus Kas Masuk (*Cash Inflow*)**	**612,393.93**	**217,834.58**	**Total Cash Inflows**
Total *Adjusted Value*				
12.	**Total HQLA**		**7,130,371.22**	**Total HQLA**
13.	**Total Arus Kas Keluar Bersih (*Net Cash Outflows*)**		**4,084,997.93**	**Total Net Cash Outflows**
14.	**LCR (%)**		**174.55**	**LCR (%)**

Tabel Pengungkapan Risiko Likuiditas
Table of Disclosure of Liquidity Risk

Pengungkapan Laporan NSFR
Disclosure of NSFR Report

Nama Bank : PT Bank Victoria International Tbk
Bank Name
Posisi Laporan : Desember 2024
Reporting Position December 2024

(dalam juta Rupiah / in million Rupiah)

No.	Keterangan ASF Description of ASF	September 2024					Desember 2024 December 2024				
		Nilai Tercatat Berdasarkan Sisa Jangka Waktu Carrying Value Based on Remaining Period				Total Nilai Tertimbang	Nilai Tercatat Berdasarkan Sisa Jangka Waktu Carrying Value Based on Remaining Period				Total Nilai Tertimbang Total Weighted Value
		Tanpa Jangka Waktu Without a Period Time	< 6 Bulan < 6 Months	≥ 6 Bulan - <1 Tahun ≥ 6 Months - < 1 Year	≥ 1 Tahun ≥ 1 Year		Tanpa Jangka Waktu Without a Period Time	< 6 Bulan < 6 Months	≥ 6 Bulan - <1 Tahun ≥ 6 Months - < 1 Year	≥ 1 Tahun ≥ 1 Year	
1.	Modal: Capital:	3,920,364.56	0.00	0.00	949,074.42	4,869,438.98	3,936,302.08	0.00	0.00	949,762.65	4,886,064.73
2.	Modal sesuai Peraturan Otoritas Jasa Keuangan KPMM Capital According to CAR Financial Services Authority Regulations	3,920,364.56	0.00	0.00	949,074.42	4,869,438.98	3,936,302.08	0.00	0.00	949,762.65	4,886,064.73
3.	Instrumen Modal Lainnya Other Capital Instruments	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4.	Simpanan yang Berasal dari Nasabah Perorangan dan Pendanaan yang Berasal dari Nasabah Usaha Mikro dan Usaha Kecil: Deposits Originating from Individual Customers and Funding from Micro and Small Business Customers:	3,419,362.50	8,859,837.23	1,138,643.04	1,267.00	12,089,988.38	3,904,546.23	8,961,707.81	979,924.09	0.00	12,474,304.05
5.	Simpanan dan Pendanaan Stabil Stable Savings and Funding	235,378.41	10,830.44	7,048.65	0.00	240,594.63	238,580.45	12,953.03	3,341.26	0.00	242,131.00
6.	Simpanan dan Pendanaan Kurang Stabil Less Stable Savings and Funding	3,183,984.09	8,849,006.79	1,131,594.39	1,267.00	11,849,393.75	3,665,965.78	8,948,754.78	976,582.83	0.00	12,232,173.05
7.	Pendanaan yang Berasal dari Nasabah Korporasi: Funding Derived from Corporate Customers:	1,750,853.50	5,572,250.48	153,628.56	2,516,089.46	5,339,098.31	2,297,230.80	7,153,566.75	35,135.82	1,532,056.00	4,496,827.85
8.	Simpanan Operasional Operational Savings	780,939.97	0.00	0.00	0.00	390,469.99	546,505.89	0.00	0.00	0.00	273,252.95
9.	Pendanaan Lainnya yang Berasal dari Nasabah Korporasi Other Funding Derived from Corporate Customers	969,913.53	5,572,250.48	153,628.56	2,516,089.46	4,948,628.32	1,750,724.91	7,153,566.75	35,135.82	1,532,056.00	4,223,574.90
10.	Liabilitas yang Memiliki Pasangan Aset yang Saling Bergantung Liabilities that Have Interdependent Asset Pairs	0.00	397,133.01	0.00	0.00	0.00	0.00	587,475.01	0.00	0.00	0.00
11.	Liabilitas dan Ekuitas Lainnya: Liabilities and Other Equity:	278,924.53	146.30	0.00	358,487.73	358,487.73	267,591.48	4,845.01	0.00	366,618.45	366,618.45
12.	NSFR Liabilitas derivative NSFR Derivative Liability		146.30	146.30	146.30			4,845.01	4,845.01	4,845.01	

(dalam juta Rupiah / in million Rupiah)

No.	Keterangan ASF Description of ASF	September 2024					Desember 2024 December 2024				
		Nilai Tercatat Berdasarkan Sisa Jangka Waktu Carrying Value Based on Remaining Period				Total Nilai Tertimbang	Nilai Tercatat Berdasarkan Sisa Jangka Waktu Carrying Value Based on Remaining Period				Total Nilai Tertimbang Total Weighted Value
		Tanpa Jangka Waktu Without a Period Time	< 6 Bulan < 6 Months	≥ 6 Bulan - <1 Tahun ≥ 6 Months - < 1 Year	≥ 1 Tahun ≥ 1 Year		Tanpa Jangka Waktu Without a Period Time	< 6 Bulan < 6 Months	≥ 6 Bulan - <1 Tahun ≥ 6 Months - < 1 Year	≥ 1 Tahun ≥ 1 Year	
13.	Ekuitas dan Liabilitas Lainnya yang Tidak Masuk dalam Kategori di Atas Equity and Other Liabilities Not Included in the Above Categories	278,924.53	0.00	0.00	358,487.73	358,487.73	267,591.48	0.00	0.00	366,618,45	366,618.45
14.	Total ASF					22,657,013.40					22,223,815.08
15.	Total HQLA dalam Rangka Perhitungan NSFR Total HQLA for the NSFR Calculation					380,459.38					443,478.24
16.	Simpanan pada Lembaga Keuangan Lain untuk Tujuan Operasional Deposits on Other Financial Institutions for Operational Purposes	436,776.57	0.00	0.00	0.00	218,388.29	111,104.40	0.00	0.00	0.00	55,552.20
17.	Pinjaman dengan Kategori Lancar dan Dalam Perhatian Khusus (*Performing*) Loans in Current and Special Mention Category (Performing)	0.00	6,903,190.77	4,188,301.58	8,630,579.59	12,646,398.81	0.00	7,393,947.00	3,596,050.34	10,187,375,78	13,708,942.70
18.	Kepada Lembaga Keuangan yang Dijamin dengan HQLA Level 1 To Financial Institutions Guaranteed with HQLA Level 1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
19.	Kepada Lembaga Keuangan yang Dijamin Bukan dengan HQLA Level 1 dan Pinjaman kepada Lembaga Keuangan Tanpa Jaminan To a Guaranteed Financial Institution Not with HQLA Level 1 and a Loan to an Insecured Financial Institution	0.00	1,288,820.29	1,704,273.41	1,452,084.84	2,497,544.59	0.00	2,175,315.71	577,665.03	2,113,930,35	2,729,060.22
20.	Kepada Korporasi Non-Keuangan, Nasabah Retail dan Nasabah Usaha Mikro dan Kecil, Pemerintah Pusat, Pemerintah Negara Lain, Bank Indonesia, Bank Sentral Negara Lain dan Entitas Sektor Publik, yang Di antaranya: To Non-Financial Corporations, Retail Customers and Micro and Small Business Customers, Central Government, Governments of Other Countries, Bank Indonesia, Central Banks of Other Countries and Public Sector Entities, Including:	0.00	4,483,260.89	2,148,772.54	6,641,313.60	8,961,133.28	0.00	4,614,531.40	2,373,550.33	7,169,481,52	9,588,100.16
21.	Memenuhi Kualifikasi untuk Mendapat Bobot Risiko 35% atau Kurang, sesuai Surat Edaran Otoritas Jasa Keuangan ATMR untuk Risiko Kredit Qualify for A Weighted Risk of 35% or Less, In Accordance with Financial Services Authority Circular RWA for Credit Risk	0.00	676,097.62	99,092.84	0.00	387,595.23	0.00	198,920.13	497,619.79	0.00	348,269.96
22.	Kredit Beragun Rumah Tinggal yang Tidak Sedang Dijaminkan, yang Di antaranya: Unsecured Residential Property Collateralized Loans, which Include:	0.00	394.46	909.59	150,536.86	128,608.36	0.00	250.55	555.33	141,968,56	121,076.22
23.	Memenuhi Kualifikasi untuk Mendapat Bobot Risiko 35% atau Kurang, Sesuai Surat Edaran Otoritas Jasa Keuangan ATMR untuk Risiko Kredit Qualify for a Weighted Risk of 35% or Less, In Accordance with Financial Services Authority Circular RWA for Credit Risk	0.00	1,134.51	791.51	10,328.29	7,676.40	0.00	923.20	638.67	5,272,21	4,207.87

(dalam juta Rupiah / in million Rupiah)

No.	Keterangan ASF Description of ASF	September 2024					Desember 2024 December 2024				
		Nilai Tercatat Berdasarkan Sisa Jangka Waktu Carrying Value Based on Remaining Period				Total Nilai Tertimbang	Nilai Tercatat Berdasarkan Sisa Jangka Waktu Carrying Value Based on Remaining Period				Total Nilai Tertimbang Total Weighted Value
		Tanpa Jangka Waktu Without a Period Time	< 6 Bulan < 6 Months	≥ 6 Bulan - <1 Tahun ≥ 6 Months - < 1 Year	≥ 1 Tahun ≥ 1 Year		Tanpa Jangka Waktu Without a Period Time	< 6 Bulan < 6 Months	≥ 6 Bulan - <1 Tahun ≥ 6 Months - < 1 Year	≥ 1 Tahun ≥ 1 Year	
24.	Surat Berharga dengan kategori Lancar dan Kurang Lancar (*Performing*) yang Tidak Sedang Dijaminkan, Tidak Gagal Bayar, dan Tidak Masuk sebagai HQLA, Termasuk Saham yang Diperdagangkan di Bursa Securities with Current and Undercurrent (Performing) Categories that are not being Pledged Collateral, Do Not Default, and are Not Included as HQLA, Including Exchange-Traded Shares	0.00	453,483.00	234,461.69	376,316.00	663,840.95	0.00	404,006.01	146,021.19	756,723,14	918,228.27
25.	Aset yang Memiliki Pasangan Liabilitas yang Saling Bergantung Assets that Have Interdependent Liability Pairs	0.00	0.00	300,899.73	100,785.45	0.00	0.00	300,592.26	0.00	305,306,23	0.00
26.	Aset Lainnya: Other Assets:	601,813.93	484,217.26	30,928.02	1,193,255.84	2,310,215.05	614,382.86	453,699.21	19,357.39	1,020,679,77	2,108,119.23
27.	Komoditas Fisik yang Diperdagangkan, Termasuk Emas Physical Commodities Traded, Including Gold	0.00				0.00	0.00				0.00
28.	Kas, Surat Berharga dan Aset Lainnya yang Dicatat sebagai Initial Margin untuk Kontrak Derivatif dan Kas atau Aset Lain yang Diserahkan sebagai *Default Fund pada Central Counterparty* (CCP) Cash, Securities and Other Assets Recorded as Initial Margin for Derivative Contracts and Cash or Other Assets Deposited as Default Funds to the Central Counterparty (CCP)		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00
29.	NSFR Aset Derivatif NSFR Derivative Assets		3,703.28	3,703.28	3,703.28	3,703.28		1,044.65	1,044.65	1,044,65	1,044.65
30.	NSFR Liabilitas Derivatif sebelum Dikurangi dengan Variation Margin NSFR Derivative Liability before Deduction of Variation Margin		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00
31.	Seluruh Aset Lainnya yang Tidak Masuk dalam Kategori di Atas All Other Assets Not Included in the Categories Above	601,813.93	480,513.98	30,928.02	1,193,255.84	2,306,511.77	614,382.86	452,654.56	19,357.39	1,020,679,77	2,107,074.58
32.	Rekening Administratif Administrative Account		7,549,766.97	7,549,766.97	7,549,766.97	301,901.42		7,788,610.31	7,788,610.31	7,788,610,31	281,081.72
33.	Total RSF					15,857,362.95					16,597,174.09
34.	Rasio Pendanaan Stabil Bersih (*Net Stable Funding Ratio* (%)) Net Stable Funding Ratio (%)					142.88					133.90

Tabel Pengungkapan Risiko Likuiditas
Table of Disclosure of Liquidity Risk

Pengungkapan Laporan Aset Terikat (*Encumbrance*) (ENC)
Disclosure of Encumbrance (ENC) Report

Nama Bank : PT Bank Victoria International Tbk
Bank Name
Posisi Laporan : Desember 2024
Reporting Position December 2024

(dalam juta Rupiah / in million Rupiah)

Uraian	a	b	c	d	Description
	Aset Terikat (*Encumbered*) Encumbered Asset	Aset yang Disimpan atau Diperjanjikan dengan Bank Sentral Namun Belum Digunakan untuk Menghasilkan Likuiditas Assets Placed or Pledged to Central Bank but Yet	Aset Tidak Terikat (*Unencumbered*) Unencumbered Asset	Total	
Aset-aset dalam Laporan Posisi Keuangan dapat Disajikan Terperinci Sepanjang Dibutuhkan	0	5,129,160	1,504,379	6,633,539	Assets in the Statement of Financial Position can be Presented in Detail As Needed

Analisis Kualitatif
Qualitative Analysis

(a) Aset terikat (*encumbered assets*) adalah aset bank yang terbatas untuk kebutuhan likuiditas, secara legal dan kontraktual oleh Bank pada saat terjadi kondisi stres. *Encumbered assets* tidak termasuk aset yang disimpan atau diperjanjikan dengan Bank Indonesia namun belum digunakan untuk menghasilkan likuiditas. Saat ini, Bank memiliki surat berharga yang dijadikan *underlying* transaksi Repo sebesar Rp496.865 juta.
(b) Saat ini, Bank memiliki aset bank yang disimpan atau diperjanjikan dengan Bank Indonesia namun belum digunakan untuk menghasilkan likuiditas yaitu penempatan pada Bank Indonesia sebesar Rp1.504.378 juta sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan No. 42/POJK.03/2015 perihal Kewajiban Pemenuhan Rasio Kecukupan Likuiditas (*Liquidity Coverage Ratio*) bagi Bank Umum.
(c) Aset Tidak Terikat merupakan aset bank yang memenuhi syarat sebagai HQLA sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan No. 42/POJK.03/2015 perihal Kewajiban Pemenuhan Rasio Kecukupan Likuiditas (*Liquidity Coverage Ratio*) bagi Bank Umum yaitu sebesar Rp5.129.160 juta.

a) Encumbered assets are bank assets restricted, both legally and contractually by the Bank, for supporting liquidity under stress conditions. Encumbered assets do not include assets being placed with or pledged to Bank Indonesia but yet to be used to create liquidity. Currently, the Bank has securities that are used as underlying Repo transactions amounting to Rp496,865 million.
(b) Currently, the Bank has bank assets that are stored or agreed with Bank Indonesia but have not been used to generate liquidity, namely placement with Bank Indonesia amounting to Rp1,504,378 million as regulated in Financial Services Authority Regulation No. 42/POJK.03/2015 on the Obligation to Fulfill the Liquidity Coverage Ratio for Commercial Banks.
(c) Unencumbered Assets are bank assets that qualify as HQLA as stipulated in Financial Services Authority Regulation No. 42/POJK.03/2015 on the Obligation to Fulfill the Liquidity Coverage Ratio for Commercial Banks, amounting to Rp5,129,160 million

Tabel Pengungkapan Risiko Operasional
Table of Disclosure of Operational Risk

Tabel Pengungkapan Kuantitatif Risiko Operasional - Bank secara Individual
Table of Disclosure of Operational Risk Quantitative - Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Pendekatan yang Digunakan	31 Desember 2024 31 December 2024 Jumlah Total	31 Desember 2023 31 December 2023 Jumlah Total	Approach Used
1.	Pendekatan Standar			Standardized Approach
	Komponen Indikator Bisnis (KIB)	**117,338,587,298**	124,452,634,563	Business Indicator Components (KIB)
	Faktor Pengali Kerugian Internal (FPKI)	**1**	1	Internal Loss Multiplier Factor (FPKI)
	Modal Minimum Risiko Operasional (MMRO)	**117,338,587,298**	124,452,634,563	Operational Risk Minimum Capital (MMRO)
	ATMR untuk Risiko Operasional	**1,466,732,341,225**	1,555,657,932,038	RWA for Operational Risk

Tabel Pengungkapan Kuantitatif Risiko Operasional - Bank secara Konsolidasi dengan Entitas Anak
Table of Disclosure of Operational Risk Quantitative - Bank Consolidated with Subsidiaries

Bank tidak memiliki eksposur risiko operasional secara konsolidasi karena berdasarkan Surat Otoritas Jasa Keuangan No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi Entitas Anak PT Bank Victoria International Tbk.

The Bank has no operational risk exposure on a consolidated basis due to based on Financial Services Authority Letter No. S-301/PB.101/2022 on Submission of the Decision on Permit to the Acquisition of PT Bank Victoria Syariah's Shares by PT Victoria Investama Tbk and Board of Directors' Letter No. 133/DIR-EKS/12/22 on the Divestment Implementation Report on PT Bank Victoria International Tbk's (Bank) Self Initiative, therefore, PT Bank Victoria Syariah is no longer a subsidiary of PT Bank Victoria International Tbk.



Tanggung Jawab Sosial dan Lingkungan Hidup

Social and Environmental Responsibility



Lembaga perbankan memainkan peran penting dalam mendorong pertumbuhan ekonomi nasional dengan menjalankan fungsi sebagai perantara yang mendukung stabilitas pasar keuangan. Menyadari peran strategis ini, Bank berkomitmen mengintegrasikan prinsip keberlanjutan dalam operasionalnya dengan memperhatikan aspek ekonomi, sosial, dan lingkungan. Inisiatif tersebut juga direalisasikan dengan melaksanakan program Tanggung Jawab Sosial dan Lingkungan Hidup (TJSL).

Banking institutions play an important role in driving national economic growth by serving as intermediaries that support financial market stability. Realizing this strategic role, the Bank is committed to integrating sustainability principles into its operations by considering economic, social, and environmental aspects. This initiative is also realized by implementing Social and Environmental Responsibility (TJSL) program.

Tata Kelola Keberlanjutan
Sustainability Governance

Dalam menjalankan kegiatan usaha, Bank senantiasa menerapkan prinsip-prinsip GCG dengan mengintegrasikan pengelolaan risiko terkait aspek ekonomi, sosial, dan lingkungan. Adapun penerapannya dilakukan melalui berbagai program yang telah sesuai dengan peraturan dan perundang-undangan yang berlaku serta *standard best practices* Laporan Keberlanjutan.

In performing its business activities, the Bank always applies GCG principles by integrating risk management in relation to economic, social, and environmental aspects. The implementation is carried out through various programs that comply with applicable laws and regulations as well as standard best practices in Sustainability Report.

Penerapan GCG yang dilakukan senantiasa berpedoman kepada ISO 26000 tentang *Guidance Standard on Social Responsibility*, yaitu:
1. Tata kelola organisasi;
2. Isu produk dan pelanggan;
3. Pemenuhan hak asasi manusia;
4. Praktik ketenagakerjaan, kesehatan, dan keselamatan kerja;
5. Lingkungan hidup;
6. Prosedur operasi yang adil; dan
7. Pelibatan dan pengembangan masyarakat.

The GCG implementation always refers to ISO 26000 on Guidance Standard and Social Responsibility, namely:
1. Organizational governance;
2. Products and customers issues;
3. Fulfillment human rights;
4. Practices of employment, occupational health and safety;
5. Environment;
6. Fair operating procedures; and
7. Community engagement and development.

Selain itu, sebagai bagian dari upaya penegakan GCG, Bank secara aktif mengintegrasikan prinsip-prinsip keuangan berkelanjutan ke dalam seluruh aspek kegiatan bisnis. Langkah ini bertujuan untuk memastikan bahwa setiap inisiatif yang diambil tidak hanya memberikan manfaat komersial, tetapi juga berkontribusi pada kesejahteraan sosial dan pelestarian lingkungan. Pendekatan internalisasi prinsip keuangan berkelanjutan di Bank dijelaskan lebih lanjut sebagai berikut:

Furthermore, as part of GCG enforcement efforts, the Bank actively integrates sustainable finance principles into all aspects of its business activities. This step aims to ensure that every initiative taken not only provides commercial benefits, but also gives contribution to social welfare and environmental preservation. The internalization approach of sustainable finance principles at the Bank is further explained as follows:

Prinsip Keuangan Berkelanjutan Sustainable Finance Principles	Implementasi di Bank Implementation at the Bank
Investasi Bertanggung Jawab **Responsible Investment**	Keputusan investasi Bank mempertimbangkan faktor ekonomi, sosial, lingkungan hidup, dan tata kelola agar dapat mengelola risiko secara lebih baik dan menghasilkan keuntungan jangka panjang yang berkelanjutan. The Bank's investment decisions consider the economic, social, environmental, and governance factors in order to manage the risks better and generate long-term, sustainable returns.
Strategi dan Praktik Bisnis Berkelanjutan **Sustainable Business Strategies and Practices**	Bank berfokus pada pencapaian tujuan jangka panjang dan menetapkan strategi jangka pendek untuk mencapainya. The Bank focuses on achieving long-term goals and setting short-term strategies to achieve them.

Prinsip Keuangan Berkelanjutan Sustainable Finance Principles	Implementasi di Bank Implementation at the Bank
Pengelolaan Risiko Sosial dan Lingkungan Hidup **Social and Environmental Risk Management**	Bank menerapkan prinsip kehati-hatian dalam mengukur risiko sosial dan lingkungan hidup dari aktivitas penghimpunan dan penyaluran dana. The Bank applies the prudence principle in measuring social and environmental risks from the funding and lending activities.
Tata Kelola **Governance**	Manajemen dan seluruh aktivitas operasi Bank menerapkan pilar governansi korporat, yaitu perilaku beretika, akuntabilitas, transparansi, dan keberlanjutan secara konsisten. The Management and all of the Bank's operational activities consistently apply the corporate governance pillars, namely ethical behavior, accountability, transparency, and sustainability.
Komunikasi yang Informatif **Informative Communication**	Bank menyediakan laporan yang informatif, mencakup strategi, tata kelola, kinerja, dan prospek ke depan. The Bank provides informative reports, covering strategy, governance, performance, and prospects.
Inklusif **Inclusive**	Bank berupaya menjamin ketersediaan dan keterjangkauan produk dan jasa sehingga dapat diakses oleh seluruh lapisan masyarakat, bahkan termasuk yang belum memiliki akses terhadap produk dan jasa perbankan. The Bank strives to ensure the availability and affordability of products and services so that they can be accessed by all levels of community, including those who do not have access to banking products and services.
Pengembangan Sektor Unggulan Prioritas **Priority Leading Sector Development**	Bank mempertimbangkan sektor-sektor unggulan prioritas yang telah ditetapkan oleh pemerintah melalui Rencana Pembangunan Jangka Menengah (RPJM) dan Rencana Pembangunan Jangka Panjang (RPJP). The Bank considers the priority leading sectors that have been determined by the government through the Medium-Term Development Plan (RPJM) and the Long-Term Development Plan (RPJP).
Koordinasi dan Kolaborasi **Coordination and Collaboration**	Dalam rangka menyelaraskan kebijakan, strategi, peluang bisnis, dan inovasi produk dan jasa dengan kepentingan nasional, Bank berpartisipasi dalam forum/kegiatan/kerja sama terkait keuangan berkelanjutan, baik pada tingkat lokal, nasional, maupun regional. To align policies, strategies, business opportunities, and innovation of products and services with national interests, the Bank participates in forums/activities/cooperations related to sustainable finance, at local, national, or regional levels.

Struktur Tata Kelola Keberlanjutan [POJK E.1]

Penerapan prinsip keuangan berkelanjutan dan pengelolaan aspek Lingkungan, Sosial, dan Tata Kelola (LST) merupakan tanggung jawab bersama seluruh jajaran Bank di setiap unit kerja dan direktorat. Bank melibatkan peran aktif Direksi dan Dewan Komisaris dalam pengawasan tata kelola keberlanjutan serta pemantauan kinerja yang terkait dengan LST. Struktur tata kelola keberlanjutan Bank disusun sejalan dengan struktur GCG yang diterapkan di seluruh organisasi.

Adapun tugas dan tanggung jawab dalam implementasi prinsip keuangan berkelanjutan sesuai dengan Surat Keputusan Direksi No. 004A/SK-DIR/07/23 tentang Tim Penyusun dan Pelaksana Aksi Keuangan Berkelanjutan PT Bank Victoria International Tbk tanggal 4 Juli 2023, yang diuraikan sebagai berikut:

Sustainable Governance Structure [POJK E.1]

The implementation of sustainable finance principles and the management of Environmental, Social, and Governance (ESG) aspects are shared responsibilities of all levels of the Bank in each work unit and directorate. The Bank involves the active roles of Board of Directors and Board of Commissioners in supervising sustainability governance and monitoring performance related to ESG. The Bank's sustainability governance structure is prepared in line with GCG structure applied throughout the organization.

The duties and responsibilities in implementing sustainable finance principles are in accordance with the Board of Directors' Decision Letter No. 004A/SK-DIR/07/23 on the Team for Preparing and Implementing Sustainable Financial Actions of PT Bank Victoria International Tbk dated 4 July 2023, described as follows:

Jabatan Position	Posisi di Bank Position at the Bank
Penanggung Jawab **Person in Charge**	Direksi Board of Directors
Ketua **Chairman**	*Senior EVP of Change Management Office*
Wakil Ketua Merangkap Anggota **Vice Chairman concurrently as Member**	*Head of Change Management Office Division*

Jabatan Position	Posisi di Bank Position at the Bank
Anggota Member	• *SEVP of Operation & International Banking;* • *SEVP of Business;* • *Head of Credit Risk Review Division;* • *Head of HCM & GA Division;* • *Head of Operations Division;* • *Head of Technology Information Division;* • *Head of Compliance, System Procedure & Customer Protection Division;* • *Head of Risk Management/Integrated Division;* • *Head of Corporate Secretary Division;* • *Head of SKAI Division;* • *Head of SME Banking Division;* • *Head of Commercial Banking Division;* dan / and • *Head of Branch Banking Network Division.*

Pelaksanaan aksi keuangan berkelanjutan dan/atau portofolio hijau dikoordinasikan oleh Divisi *Change Management Office* yang didukung oleh seluruh divisi terkait. Sementara itu, tugas dan tanggung jawab Tim Penyusun dan Pelaksana Aksi Keuangan Berkelanjutan sebagai berikut:

1. Menetapkan strategi dan kriteria portofolio hijau;
2. Melakukan pemetaan portofolio kredit yang memenuhi kriteria portofolio hijau;
3. Mempersiapkan sistem, kebijakan, dan prosedur;
4. Menyusun dan melaksanakan rencana aksi keuangan berkelanjutan dan/atau portofolio hijau;
5. Mempersiapkan, memonitor, dan menyampaikan laporan dan/atau data terkait aksi keuangan keberlanjutan dan/atau portofolio hijau kepada manajemen dan regulator;
6. Menyusun dan menyampaikan laporan rencana dan laporan realisasi aksi keuangan berkelanjutan, termasuk melakukan publikasi; dan
7. Mempersiapkan dan melaksanakan rencana *training sustainable finance*.

The implementation of sustainable financial actions and/or green portfolios is coordinated by the Change Management Office Division, supported by all related divisions. Meanwhile, the duties and responsibilities of Sustainable Finance Action Preparation and Implementation Team are as follows:

1. Determining strategy and criteria for the green portfolio;
2. Mapping loans portfolio that meets the criteria for green portfolio;
3. Preparing system, policies, and procedures;
4. Preparing and implementing sustainable finance action plan and/or green portfolio;
5. Preparing, monitoring, and submitting reports and/or data related to sustainable finance actions and/or green portfolios to the management and regulators;
6. Preparing and submitting reports on sustainable finance action plans and realization reports, including publication; and
7. Preparing and implementing sustainable finance training plan.

Pengembangan Kompetensi Terkait Keuangan Berkelanjutan [POJK E.2]

Bank secara konsisten melaksanakan pengembangan kompetensi terkait LST dan keuangan berkelanjutan untuk karyawan setiap tahunnya. Pada tahun 2024, 5% karyawan telah mendapatkan pelatihan-pelatihan maupun sosialisasi terkait LST dan keuangan berkelanjutan. Sementara itu, materi pengembangan kompetensi tersebut diuraikan sebagai berikut:

Competency Development Related to Sustainable Finance [POJK E.2]

The Bank consistently carries out competency development related to ESG and sustainable finance for employees on an annual basis. In 2024, 5% of employees received training and dissemination related to ESG and sustainable finance. Meanwhile, the competency development materials are outlined as follows:

Jenjang Jabatan Level of Position	Materi Pelatihan dan Penyelenggara Training Materials and Organizers
Dewan Komisaris Board of Commissioners	*Expert Sharing Session*: Keuangan Berkelanjutan dari Agus Sugiarto Expert Sharing Session: Sustainable Finance from Agus Sugiarto
Direksi Board of Directors	*Expert Sharing Session*: Keuangan Berkelanjutan dari Agus Sugiarto Expert Sharing Session: Sustainable Finance from Agus Sugiarto

Jenjang Jabatan Level of Position	Materi Pelatihan dan Penyelenggara Training Materials and Organizers
Senior Executive Vice President	*Expert Sharing Session*: Keuangan Berkelanjutan dari Agus Sugiarto Expert Sharing Session: Sustainable Finance from Agus Sugiarto
Kepala Divisi/Wakil Kepala Divisi Head of Division/Vice Division Head	*Expert Sharing Session*: Keuangan Berkelanjutan dari Agus Sugiarto Expert Sharing Session: Sustainable Finance from Agus Sugiarto
Officer	*Training* Pembiayaan Berkelanjutan dari Otoritas Jasa Keuangan Training on Sustainable Financing from Financial Services Authority

Pencapaian dan Biaya Pengembangan Kompetensi Terkait Keuangan Berkelanjutan

Pencapaian dan biaya pengembangan kompetensi terkait keuangan berkelanjutan dalam kurun waktu 3 (tiga) tahun terakhir sebagai berikut:

Achievements and Costs of Competency Development Related to Sustainable Finance

The achievements and costs of competency development related to sustainable finance in the past 3 (three) years are as follows:

Uraian	2024	2023	2022	Description
Total Peserta (Orang)	**39**	43	86	Total Participants (People)
Biaya (Rp)	**46,446,548**	34,742,047	18,071,058	Cost (Rp)

Penilaian Risiko atas Penerapan Keuangan Berkelanjutan [POJK E.3]

Bank secara berkelanjutan mengevaluasi strategi manajemen risiko untuk memastikan keselarasan dengan visi, misi, dan strategi keberlanjutan yang telah ditetapkan. Evaluasi dilakukan dengan mempertimbangkan pencapaian target dalam RAKB tahun sebelumnya, sebagai dasar perumusan strategi manajemen risiko yang lebih baik. Dengan pendekatan tersebut, Bank bertujuan untuk memastikan penerapan prinsip keuangan berkelanjutan yang efektif dan efisien, yang juga memperkuat proses transformasi digital dengan tetap memegang teguh prinsip kehati-hatian.

Bank telah menyiapkan langkah-langkah mitigasi untuk menghadapi potensi ketidaksesuaian antara realisasi program dengan target atau jadwal yang ditetapkan dalam RAKB. Langkah tersebut meliputi:

1. Evaluasi terhadap program-program keuangan berkelanjutan yang telah berjalan;
2. Konsultasi dengan pihak eksternal untuk mengidentifikasi dan menyelesaikan kendala yang ada; dan
3. Pengkajian ulang indikator kinerja yang digunakan untuk tahun-tahun berikutnya, berdasarkan realisasi program keuangan berkelanjutan yang telah dilaksanakan.

Melalui pendekatan ini, Bank berupaya untuk terus meningkatkan efektivitas program keberlanjutan di tahun-tahun mendatang, memastikan pencapaian yang optimal sesuai dengan tujuan strategis yang lebih luas.

Risk Assessment of Sustainable Finance Implementation [POJK E.3]

The Bank continuously evaluates its risk management strategy to ensure the alignment with its established vision, mission, and sustainability strategy. The evaluation is carried out by considering target achievement in the previous year's RAKB, that serves as a basis for formulating better risk management strategies. With this approach, the Bank aims to ensure the implementation of effective and efficient sustainable finance principles, which also strengthens the digital transformation process while adhering to the prudential principles.

The Bank has prepared mitigation steps to deal with potential discrepancies between program realization and targets or schedules determined in the RAKB. These steps include:

1. Evaluation of sustainable finance programs that have been running;
2. Consultation with external parties to identify and resolve existing constraints; and
3. Review of the performance indicators used in the following years, based on the realization of sustainable finance programs carried out.

Through this approach, the Bank seeks to improve the effectiveness of sustainability programs in the future years, ensuring optimal achievements in line with broader strategic objectives.

Keberlanjutan Kinerja Ekonomi
Economic Performance Sustainability



Kinerja Operasional dan Keuangan
[POJK F.2] [POJK F.3]

Kinerja operasional dan keuangan merupakan salah satu faktor penting untuk menunjang keberhasilan Bank dalam menjalankan dan mengimplementasikan komitmen keberlanjutan dalam kegiatan bisnis. Oleh karena itu, Bank senantiasa mengedepankan penerapan strategi-strategi yang jelas dan terukur demi mengupayakan capaian kinerja keuangan dan operasional sesuai dengan target yang telah ditetapkan.

Informasi pencapaian kinerja keuangan dan operasional Bank dalam kurun waktu 3 (tiga) tahun ditunjukkan sebagai berikut:

Operational and Financial Performance
[POJK F.2] [POJK F.3]

Operational and financial performance is one important factor to support the Bank's success in carrying out and implementing sustainability commitments in business activities. Therefore, the Bank always prioritizes the implementation of clear and measurable strategies in order to strive for financial and operational performance achievements in line with the targets set.

Information on the Bank's financial and operational performance achievements over the past 3 (three) years is shown as follows:

(dalam miliar Rupiah / in billion Rupiah)

Uraian	2024		2023	2022*	Description
	Target	Realisasi Realization			
Kinerja Keuangan **Financial Performance**					
Total Aset	**30,000**	**31,046**	29,624	25,932	Total Assets
Total Liabilitas	**26,081**	**27,113**	25,799	22,232	Total Liabilities
Total Ekuitas	**3,919**	**3,933**	3,825	3,700	Total Equity
Pendapatan Bunga – Bersih	**533**	**549**	579	733	Interest Income – Net
Pendapatan (Beban) Operasional selain Bunga – Bersih	**(349)**	**(256)**	(405)	(319)	Operating Income (Expenses) other than Interest – Net
Laba Operasional	**184**	**293**	174	414	Profit from Operations
Laba Bersih Tahun Berjalan	**106**	**118**	102	226	Net Profit for the Year

Uraian	2024		2023	2022*	Description
	Target	Realisasi Realization			
Kinerja Operasional **Operational Performance**					
Total Produk Simpanan	**23,034**	**23,332**	22,429	19,372	Total Deposits Products
Total Produk Pinjaman	**20,037**	**20,560**	18,629	15,825	Total Loan Products
Total Pembiayaan Terhadap Kegiatan Usaha Berkelanjutan (dalam miliar)	**554**	**601**	504	444	Total Financing for Sustainable Business Activities (in billion)

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

Nilai Ekonomi Langsung yang Dihasilkan dan Didistribusikan

Kinerja baik yang mampu dicapai Bank pada tahun 2024 memampukan Bank untuk terus mempertahankan pemberian manfaat ekonomi secara langsung bagi pemangku kepentingan. Nilai ekonomi langsung yang dihasilkan dan didistribusikan Bank selama 3 (tiga) tahun terakhir ditunjukkan sebagai berikut:

Direct Economic Value Generated and Distributed

The good performance achieved by the Bank in 2024 enables the Bank to continuously maintain the provision of direct economic benefits to stakeholders. The direct economic value generated and distributed by the Bank over the past 3 (three) years are shown as follows:

(dalam juta Rupiah / in million Rupiah)

Uraian	2024	2023	2022*	Description
Nilai Ekonomi Langsung yang Dihasilkan **Direct Economic Values Generated**				
Penerimaan dari Pendapatan Bunga dan Syariah dan Komisi	**2,141,595**	1,866,455	1,585,072	Receipt from Interest and Sharia Income and Commissions
Penerimaan dari Operasional Lainnya	**361,686**	253,716	363,011	Receipt from Other Operating Income
Penerimaan dari Penjualan Agunan yang Diambil Alih	**206,826**	385,438	14,101	Receipt from Sale of Foreclosed Assets
Pendapatan Non-Operasional Lainnya	**-**	3,871	-	Other Non-Operating Income
Kenaikan dalam Kewajiban Operasi	**335,541**	3,256,073	1,870,146	Increase in Operating Liabilities
Hasil Penjualan Aset Tetap	**28,782**	45,396	17,287	Proceeds from Sale of Fixed Assets
Total	**3,074,430**	**5,464,055**	**3,849,618**	**Total**
Nilai Ekonomi yang Didistribusikan **Distributed Economic Value**				
Pembayaran Bunga dan Syariah	**1,498,664**	1,241,690	936,210	Payment of Interest and Sharia Expense
Pembayaran Beban Umum dan Administrasi	**175,915**	135,298	118,617	Payment of General and Administrative Expenses
Pembayaran Beban Tenaga Kerja	**168,825**	161,897	132,900	Payment of Personnel Expenses
Pembayaran Beban Operasional Lainnya	**166,668**	125,072	62,434	Payments of Other Operating Expenses
Pembayaran Non-Operasional Lainnya	**-**	-	28,898	Payment of Other Non-Operating Income
Pembayaran Pajak Penghasilan	**-**	16,049	-	Payment of Income Tax
Kenaikan dalam Aset Operasi	**1,977,893**	2,802,368	1,496,221	Increase in Operating Assets
Penurunan dalam Kewajiban Operasi	**-**	-	-	Decrease in Operating Liabilities
Pembelian Aset Tetap	**19,802**	16,196	7,527	Purchase of Fixed Assets
Pembelian Aset Tak Berwujud	**5,893**	7,289	1,880	Purchase of Intangible Assets
Pembayaran Sewa	**12,635**	10,757	10,959	Payment of Lease
Biaya Investasi Sosial	**1,209**	180	238	Social Investment Cost
Total	**4,027,504**	**4,516,796**	**2,795,883**	**Total**
Nilai Ekonomi yang Ditahan	**953,074**	**947,259**	**1,053,735**	**Economic Value Retained**

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

Mendukung Pertumbuhan Perekonomian Indonesia

Bank berkomitmen untuk terus mendukung pertumbuhan perekonomian Indonesia melalui penyaluran kredit kepada pelaku bisnis. Informasi mengenai capaian kinerja pembiayaan Bank selama 3 (tiga) tahun terakhir ditunjukkan sebagai berikut:

Supporting Indonesia's Economic Growth

The Bank is committed to constantly supporting the growth of Indonesian economy by lending to business players. Information regarding the Bank's financing performance achievements over the past 3 (three) years is shown as follows:

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

Uraian Description	2024		2023		2022*	
	Jumlah Total	Komposisi Composition (%)	Jumlah Total	Komposisi Composition (%)	Jumlah Total	Komposisi Composition (%)
Lembaga Pembiayaan Financing Institution	**5,577,685**	**27.13**	5,563,012	29.86	3,810,285	24.08
Perdagangan, Restoran, dan Hotel Trading, Restaurant, and Hotel	**4,092,649**	**19.91**	3,574,240	19.19	3,471,734	21.94
Industri Industry	**3,015,057**	**14.66**	2,186,357	11.74	1,546,407	9.77
Real Estat Real Estate	**2,476,933**	**12.05**	2,533,799	13.60	2,434,559	15.38
Konstruksi Construction	**1,100,320**	**5.35**	737,807	3.96	782,272	4.94
Jasa-Jasa Sosial/Masyarakat Social/Community Services	**417,107**	**2.03**	349,351	1.88	423,151	2.67
Lain-Lain Others	**3,880,110**	**18.87**	3,684,177	19.78	3,356,203	21.21
Total	**20,559,860**	**100.00**	**18,628,743**	**100.00**	**15,824,611**	**100.00**

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

Selain mendukung pertumbuhan ekonomi nasional melalui penyaluran kredit ke berbagai sektor, Bank juga turut mendukung pertumbuhan pelaku usaha di sektor Usaha Mikro, Kecil, dan Menengah (UMKM). Informasi mengenai capaian pembiayaan ke sektor UMKM yang dilakukan Bank selama 3 (tiga) tahun terakhir ditunjukkan sebagai berikut:

In addition to supporting national economic growth through lending to various sectors, the Bank also supports the growth of business players in Micro, Small, and Medium Enterprises (MSMEs) sector. Information regarding financing achievements to MSME sector conducted by the Bank over the past 3 (three) years is shown as follows:

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

Uraian Description	2024		2023		2022	
	Jumlah Total	Komposisi Composition (%)	Jumlah Total	Komposisi Composition (%)	Jumlah Total	Komposisi Composition (%)
Usaha Mikro Micro Business	**-**	**-**	-	-	-	-
Usaha Kecil Small Business	**13,778**	**0.43**	16,499	0.54	20,696	0.85
Usaha Menengah Medium Business	**3,157,840**	**99.57**	3,037,478	99.46	2,424,657	99.15
Total	**3,171,618**	**100.00**	**3,053,977**	**100.00**	**2,445,354**	**100.00**

Pembiayaan Terhadap Kegiatan Usaha Berkelanjutan [POJK F.3]

Dalam menerapkan prinsip keuangan berkelanjutan, Bank menyalurkan pembiayaan pada 4 (empat) dari 12 (dua belas) kategori kegiatan usaha berkelanjutan. Informasi mengenai kinerja pembiayaan berkelanjutan Bank selama 3 (tiga) tahun terakhir ditunjukkan sebagai berikut:

Financing for Sustainable Business Activities [POJK F.3]

In implementing sustainable finance principles, the Bank provides financing to 4 (four) of the 12 (twelve) categories of sustainable business activities. Information regarding the Bank's sustainable financing performance over the past 3 (three) years is shown as follows:

(dalam juta Rupiah / in million Rupiah)

Uraian	Penyaluran Kredit Loans			Description
	2024	2023	2022	
Pencegahan dan Pengendalian Polusi	**73,773**	219,043	108,375	Pollution Prevention and Control
Pengelolaan Sumber Daya Alam Hayati dan Penggunaan Lahan yang Berkelanjutan	**308,076**	173,182	393,548	Management of Biodiversity Resources and Sustainable Land Use
Kegiatan Usaha dan/atau Kegiatan Lain yang Berwawasan Lingkungan Lainnya	**205,667**	88,158	115,136	Eco-Friendly Business Activities and/or Other Activities
Energi Terbarukan	**15,482**	-	-	Renewable Energy
Kegiatan UMKM	**3,167,772**	3,053,977	2,445,354	MSME Activities
Total	**3,770,770**	**3,534,360**	**3,062,413**	**Total**

Literasi dan Inklusi Keuangan

Bank melaksanakan program literasi dan inklusi keuangan guna meningkatkan kemampuan masyarakat di Indonesia dalam pengelolaan keuangan. Program literasi dan inklusi keuangan dilaksanakan berdasarkan kebijakan yang ditetapkan melalui Surat Keputusan Direksi No. 004/SK-DIR/10/24 dan dikoordinasikan oleh Divisi *Branch Banking Network* dan divisi terkait lainnya.

Adapun tahapan implementasi program literasi dan inklusi keuangan diuraikan sebagai berikut:

Financial Literacy and Inclusion

The Bank carries out financial literacy and inclusion programs to improve the financial management skills of people in Indonesia. The financial literacy and inclusion programs are implemented based on policies stipulated through the Board of Directors' Decision Letter No. 004/SK-DIR/10/24 and coordinated by Branch Banking Network Division and other relevant divisions.

The implementation stages for the financial literacy and inclusion program are described as follows:

Perencanaan dan Persiapan **Planning and Preparation**	Materi edukasi disampaikan oleh para profesional yang telah mendapatkan pelatihan khusus dan memiliki pemahaman mendalam tentang program yang diajarkan. Untuk meningkatkan pemahaman peserta, Bank menyediakan materi dengan dukungan media audio-visual berkualitas tinggi. Sebagai tambahan, beberapa lagu anak bertema "Ayo Menabung" juga dipersiapkan untuk menarik minat siswa dalam mengikuti kegiatan edukasi. Apabila program dilaksanakan secara virtual, Bank juga menyediakan tautan Zoom sebagai sarana pelaksanaan edukasi dan literasi keuangan.	Educational materials are delivered by professionals who have received special training and have a deep understanding of the programs taught. To enhance participants' understanding, the Bank provides materials supported by high-quality audio-visual media. In addition, several children songs with the theme "*Ayo Menabung*" (Let's Save Money) are also prepared to attract students' interest in participating in educational activities. When the program is held virtually, the Bank also provides links for Zoom meeting as a platform for implementing financial education and literacy.
Pencapaian Tujuan yang Telah Ditetapkan **Achievement of the Predetermined Goals**	Pelaksanaan program dirancang sesuai dengan lokasi kantor cabang utama dan cabang pembantu, dengan mempertimbangkan kemudahan akses dan koordinasi antar pihak terkait. Program ini bertujuan menjadi sarana edukasi bagi masyarakat, terutama ibu-ibu, dalam meningkatkan kemampuan merencanakan keuangan rumah tangga secara lebih efektif. Sementara itu, untuk siswa SD, SMP, dan SMA, program ini diharapkan dapat menambah wawasan tentang pentingnya menabung sejak usia dini dan manfaatnya di masa depan.	The program implementation is designed according to the location of main branch and sub-branch offices, by considering accessibility and coordination between related parties. This program aims to be a means of education for the community, particularly housewives, in improving their ability to plan household finances more effectively. Meanwhile, for elementary, junior high, and high school students, this program is expected to increase their insight into the importance of saving money early and its benefits in the future.

Pelaksanaan Strategi dan Kebijakan **Implementation of Strategies and Policies**	Program literasi keuangan dilaksanakan secara berkala mengikuti tahapan implementasi berikut: • Sebelum program dimulai, peserta akan mengikuti *pre-test* untuk mengukur tingkat pemahaman awal peserta. Tes ini terdiri dari 17 pertanyaan yang berhubungan dengan topik yang akan dibahas selama program; • Setelah hasil *pre-test* dianalisis, edukasi akan diberikan oleh tim dari Bank Victoria melalui metode interaktif yang mendorong partisipasi aktif peserta, memungkinkan peserta bertanya dan menyampaikan pendapat secara langsung; dan • Setelah program selesai, peserta akan menjalani *post-test* dengan pertanyaan serupa dari *pre-test* untuk mengukur sejauh mana pemahaman peserta telah berkembang serta mengevaluasi keberhasilan program. *Pre-test* dan *post-test* juga dapat dilaksanakan secara virtual melalui aplikasi khusus yang terpisah dari Zoom yang digunakan selama sesi edukasi.	The financial literacy program is implemented periodically in accordance with the following implementation stages: • Before the program begins, participants will take a pre-test to measure their initial level of understanding. This test consists of 17 questions related to the topics to be discussed during the program; • After the pre-test results are analyzed, education will be provided by Bank Victoria team through an interactive method that encourages active participation of participants, allowing them to directly raise questions and express opinions; and • After the program is completed, participants will undergo a post-test with similar questions from the pre-test to measure the extent to which participants' understanding has developed and to evaluate the success of the program. Pre-test and post-test can also be conducted virtually through separate dedicated application from Zoom that is used during the education sessions.
Evaluasi Kendala yang Dihadapi dan Upaya-Upaya Pemecahan Masalah **Evaluation of Obstacles Encountered and Problem-Solving Measures**	Bank menghadapi sejumlah tantangan dalam mengajak peserta untuk mengikuti program, antara lain: • Waktu yang terbatas menyebabkan pemahaman mengenai pentingnya perencanaan keuangan rumah tangga kurang maksimal; • Beberapa sekolah swasta, yang menjadi target program, memiliki kebijakan internal yang membatasi pelaksanaan program di lingkungan sekolah tersebut; • Terbatasnya akses internet yang memengaruhi partisipasi siswa; dan • Tidak semua ibu rumah tangga memiliki perangkat atau pemahaman yang memadai terkait penggunaan aplikasi Zoom saat program dilakukan secara virtual. Untuk mengatasi hambatan-hambatan tersebut, Bank mengambil langkah-langkah proaktif, seperti berkoordinasi dengan para pemimpin kelompok peserta edukasi dan bekerja sama dengan pihak-pihak terkait, sehingga program dapat terlaksana dengan lancar dan mencapai target yang ditetapkan.	The Bank encountered several challenges in inviting participants to participate in the program, including: • Limited time that results in less than optimal understanding of the importance of household financial planning; • Several private schools, which are the program targets, have internal policies that limit the program implementation within the school; • Limited internet access which affects student participation; and • Not all housewives have devices or adequate understanding on how to use Zoom application when the program is held virtually. To overcome these obstacles, the Bank took proactive steps, such as coordinating with the leaders of education participant groups and working together with related parties, so that the program could be held smoothly and achieve the targets set.

Pelaksanaan Program Literasi dan Inklusi Keuangan

Pelaksanaan program literasi dan inklusi keuangan Bank di tahun 2024 diuraikan sebagai berikut:

1. Kegiatan edukasi *digital banking* dengan tema "*Technology Make a Difference*" di SMAN 8 Cireundeu, Tangerang Selatan dengan peserta siswa-siswi SMA kelas 11 sebanyak 60 orang;
2. Kegiatan edukasi perbankan dengan tema "Ayo ke Bank" di SMPN 13 Jakarta Selatan dengan peserta siswa-siswi kelas 7,8, dan 9 sebanyak 100 orang; serta
3. Kegiatan edukasi *digital banking* dengan tema "*Technology Make a Difference*" di Universitas Bina Nusantara Jakarta Barat dengan peserta mahasiswa dan mahasiswi sebanyak 75 orang.

Implementation of Financial Literacy and Inclusion Program

The implementation of the Bank's financial literacy and inclusion program in 2024 is described as follows:

1. Education activities of digital banking with the theme "Technology Makes a Difference" at SMAN 8 Cireundeu, South Tangerang, with 60 high school grade 11 students participating;
2. Banking education activity with the theme "Ayo ke Bank" (Let's Go to the Bank) at SMPN 13 South Jakarta with 100 grade 7, 8, and 9 students participating; and
3. Education activities of digital banking with the theme "Technology Makes a Difference" at Bina Nusantara University, West Jakarta, with 75 male and female students.

Keberlanjutan Kinerja Sosial
Social Performance Sustainability

Komitmen Pelayanan Terbaik bagi Nasabah [POJK F.17]

Bank berkomitmen untuk menyediakan produk dan layanan perbankan yang andal serta memastikan setiap nasabah memiliki akses yang setara terhadap semua produk dan layanan yang ditawarkan. Komitmen ini diatur dalam Surat Keputusan Direksi No. 041/SK-DIR/07/14 tentang Kebijakan dan Prosedur Kualitas Pelayanan Nasabah (*Customer Experience*), yang juga menjadi panduan utama bagi Standar Pelayanan Nasabah di Bank Victoria.

Manfaat dari Produk dan Layanan yang Diberikan [POJK F.28]

Bank berkomitmen untuk menyediakan solusi keuangan yang komprehensif bagi nasabah individu dan korporasi, mencakup berbagai kebutuhan ekonomi. Melalui produk simpanan, pinjaman, layanan investasi, dan bank devisa, Bank membantu mengelola transaksi keuangan sehari-hari hingga perencanaan jangka panjang. Selain itu, Bank menyediakan berbagai layanan tambahan yang mendukung kebutuhan keuangan nasabah secara menyeluruh.

Namun, Bank juga menyadari adanya potensi dampak negatif dari produk dan layanan, terutama terkait dengan penyaluran kredit di sektor-sektor tertentu. Dampak negatif yang diidentifikasi meliputi risiko sosial dan lingkungan. Secara sosial, terdapat potensi pelanggaran hak asasi manusia, seperti pekerja di bawah umur, upah di bawah standar minimum, dan kondisi kerja yang tidak layak di industri padat karya. Untuk memitigasi risiko ini, Bank menerapkan persyaratan kredit yang ketat, memastikan bahwa calon debitur mematuhi peraturan ketenagakerjaan, serta meningkatkan pengawasan melalui survei lapangan secara berkala.

Di sisi lingkungan, Bank mengakui adanya potensi ancaman seperti deforestasi, kebakaran hutan dan lahan, serta dampak perubahan iklim, yang berkontribusi pada degradasi lingkungan dalam sektor berbasis lahan. Untuk mencegah hal ini, Bank memberlakukan kebijakan yang mewajibkan dokumen Analisis Mengenai Dampak Lingkungan (AMDAL) bagi debitur yang mengelola lahan seluas 25 hektare atau lebih sebagai salah satu syarat pengajuan kredit. Dengan langkah ini, Bank berusaha memastikan bahwa setiap proyek yang dibiayai telah memperhatikan dampak lingkungan dan mengambil langkah-langkah mitigasi yang tepat.

Bank akan terus mengidentifikasi potensi risiko dan mengembangkan kebijakan serta praktik terbaik yang mendukung keberlanjutan sosial dan lingkungan, sambil tetap melayani kebutuhan keuangan nasabah dengan produk yang inovatif dan bertanggung jawab.

Commitment to the Best Service for Customers [POJK F.17]

The Bank is committed to providing reliable banking products and services and ensuring that every customer has equal access to all products and services offered. This commitment is stipulated in the Board of Directors' Decision Letter No. 041/SK-DIR/07/14 on Policies and Procedures for Customer Service Quality (Customer Experience), which also serves as the main guideline for Customer Service Standards at Bank Victoria.

Benefits of Products and Services Provided [POJK F.28]

The Bank is committed to providing comprehensive financial solutions for individual and corporate customers, covering various economic needs. Through savings products, loans, investment services, and foreign exchange banking services, the Bank helps manage day-to-day financial transactions to long-term planning. Furthermore, the Bank provides various additional services that support customers' overall financial needs.

However, the Bank is also aware of the potential negative impacts of products and services, particularly related to lending in certain sectors. The negative impacts identified include social and environmental risks. In social terms, there is a potential for human rights violations, such as underage workers, wage below the minimum standard, and unsuitable working conditions in labor-intensive industries. To mitigate these risks, the Bank applies strict loan requirements, ensures that the potential debtors comply with labor regulations, and increases supervision through regular field surveys.

On environmental side, the Bank recognizes potential threats such as deforestation, forest and land fires, and the impacts of climate change, which contribute to environmental degradation in land-based sector. To prevent this matter, the Bank implements the policy that requires an Environmental Impact Analysis (AMDAL) document for debtor who manages land of 25 hectares or more as one of the requirements for applying loan. With this step, the Bank seeks to ensure that every project financed has considered environmental impacts and taken appropriate mitigation measures.

The Bank will continue to identify potential risks and develop policies and best practices that support social and environmental sustainability, while continuing to serve customers' financial needs with innovative and responsible products.

Inovasi dan Pengembangan Produk dan Jasa

[POJK F.26]

Bank berupaya mengembangkan produk dan layanan untuk terus meningkatkan daya saing dan sesuai dengan kebutuhan nasabah. Pada tahun 2024, Bank telah merealisasikan beberapa program dalam rangka pengembangan produk dan jasa sebagaimana diuraikan berikut:

1. Penandatanganan kerja sama strategis dengan PT Jalin Pembayaran Nusantara terkait:
   a. Tarik tunai tanpa kartu (*Cardless Cash Withdrawal*/CCW) menggunakan mesin ATM bank-bank HIMBARA; dan
   b. Interkoneksi kode *QR Indonesia Standard* sebagai QRIS *Merchant Acquirer* dan QRIS *Cross-Border* dalam jaringan *Link*.
2. Kerja sama dengan pihak ketiga untuk *acquire* nasabah serta menyediakan layanan *financial planning fitur* dan edukasi financial (Finetiks);
3. Kerja sama layanan pembelian *voucher* digital (*Ultra Voucher*) pada aplikasi *New Victoria Mobile* antara Bank Victoria dengan PT Trimegah Karya Pratama;
4. Peluncuran *New Victoria Mobile* pada Maret 2024 dengan fitur terbaru, termasuk proses pembukaan rekening digital/*onboarding* bagi nasabah baru dan proses registrasi secara mandiri melalui aplikasi;
5. Penambahan fitur pada aplikasi *New Victoria Mobile*, termasuk tarik tunai tanpa kartu (*Cardless Cash Withdrawal*/CCW) menggunakan mesin ATM bank-bank swasta, QRIS pembayaran *Merchant Presented Mode* dan *top up e-wallet* dalam jaringan Prima, bekerja sama dengan PT Rintis Sejahtera;
6. Penambahan fitur *bancassurance* digital di *New Victoria Mobile*, bekerja sama dengan PT BNI Life Insurance;
7. Kerja sama produk reksa dana dengan Syailendra Capital guna memperluas pilihan investasi bagi nasabah;
8. Penambahan produk reksa dana dengan Setiabudi Investment Management sebagai bagian dari diversifikasi produk investasi; dan
9. Penambahan produk *bancassurance* dengan Generali, guna meningkatkan pilihan perlindungan keuangan bagi nasabah.

Program Peningkatan Kualitas Layanan

Guna meningkatkan kualitas layanan, Bank melaksanakan berbagai program berikut:

1. Menyusun standar *service excellence* bagi seluruh kantor cabang sesuai dengan tuntutan dan harapan nasabah;
2. Melaksanakan dan memantau kegiatan *service excellence* secara konsisten di kantor cabang;
3. Menetapkan standar *zero defect* dalam operasional transaksi perbankan;
4. Melakukan pelatihan dan pengembangan *service excellence* bagi pegawai *frontliner* di seluruh kantor cabang Bank;
5. Menggunakan kartu ATM berbasis *chip card* untuk mendukung peningkatan keamanan nasabah; dan
6. Mengembangkan sistem kliring nasional (SKN) dan *real time gross settlement* (RTGS) Generasi II untuk fitur *bulk payment* (*kliring one to many transfer*), menyediakan *internet banking* dan *mobile banking* untuk kenyamanan bertransaksi bagi nasabah, serta memperbaiki tampilan situs web Bank menjadi lebih interaktif agar lebih mudah dipahami oleh pengguna.

Product and Service Innovation and Development

[POJK F.26]

The Bank strives to develop products and services to continuously improve its competitiveness and meet customer needs. In 2024, the Bank realized several programs in developing products and services as described below:

1. Signing of strategic cooperation with PT Jalin Pembayaran Nusantara on:
   a. Cardless Cash Withdrawal (CCW) by using HIMBARA banks' ATM; and
   b. Interconnection of QR Indonesia Standard code as QRIS Merchant Acquirer and QRIS Cross-Border in Link network.
2. Cooperation with third parties to acquire customers and provide financial planning features as well as financial education services (Finetiks);
3. Cooperation in digital voucher purchase services (Ultra Voucher) on New Victoria Mobile application between Bank Victoria and PT Trimegah Karya Pratama;
4. Launching of New Victoria Mobile in March 2024 with the latest features, including digital account opening/onboarding process for new customers and independent registration process through the application;
5. Additional features to the New Victoria Mobile application, including Cardless Cash Withdrawal (CCW) by using private banks' ATM, QRIS Merchant Presented Mode payment and e-wallet top up within Prima network, cooperating with PT Rintis Sejahtera;
6. Additional feature of digital bancassurance in New Victoria Mobile, cooperating with PT BNI Life Insurance;
7. Mutual fund product cooperation with Syailendra Capital to expand investment options for customers;
8. Additional mutual fund products with Setiabudi Investment Management as part of investment product diversification; and
9. Additional bancassurance products with Generali, to increase financial protection options for customers.

Services Quality Improvement Program

To improve service quality, the Bank implements the following programs:

1. Developing service excellence standards that meet customer demands and expectations for all the Bank's branch offices;
2. Consistently running and monitoring service excellence activities at branch offices;
3. Establishing zero-defect standard in banking transaction operations;
4. Conducting employee training and development of service excellence for all frontline staffs of the Bank's branch offices;
5. Utilizing chip-based ATM cards to enhance customer security; and
6. Developing the national clearing system (SKN) and real time gross settlement (RTGS) Generation II to support bulk payment feature (one-to-many transfer clearing), providing internet banking and mobile banking for customers' transaction convenience, and improving the Bank's website display to be more interactive and user friendly.

Keamanan Simpanan dan Kerahasiaan Data Nasabah

Untuk meningkatkan kepercayaan nasabah, Bank memastikan keamanan bertransaksi nasabah dengan menjadi peserta Lembaga Penjamin Simpanan (LPS). Dalam hal ini, LPS telah menerapkan persyaratan ketat bagi Bank yang ikut serta sebagai anggotanya sehingga nasabah mendapatkan kepastian dana yang disimpan jika terjadi sesuatu yang tidak diinginkan pada Bank.

Selain itu, Bank senantiasa mengelola seluruh data nasabah dengan tingkat kehati-hatian yang tinggi. Secara lebih spesifik, Bank menjamin keamanan simpanan dan kerahasiaan data nasabah dengan mematuhi dan terikat pada regulasi sebagai berikut:

1. Undang-Undang No. 7 Tahun 1992 tentang Perbankan, dan perubahannya dalam Undang-Undang No. 10 Tahun 1998;
2. Undang-Undang Republik Indonesia No. 27 Tahun 2022 tentang Perlindungan Data Pribadi;
3. Undang-Undang No. 4 Tahun 2023 tentang Pengembangan dan Penguatan Sektor Keuangan;
4. Peraturan Bank Indonesia No. 2/19/PBI/2000 tentang Persyaratan dan Tata Cara Pemberian Perintah atau Izin Tertulis Membuka Rahasia Bank;
5. Peraturan Bank Indonesia No. 3 Tahun 2023 tentang Perlindungan Konsumen Bank Indonesia; dan
6. Peraturan Otoritas Jasa Keuangan No. 22 tahun 2023 tentang Perlindungan Konsumen dan Masyarakat di Sektor Jasa Keuangan.

Bank juga secara aktif mengingatkan nasabah untuk selalu mengambil langkah-langkah pencegahan dalam menjaga keamanan data pribadi dan simpanannya. Berikut beberapa imbauan yang dianjurkan oleh Bank:

Customer Deposit Security and Data Confidentiality

To increase customer trust, the Bank ensures the security of customer transactions by becoming a participant in the Deposit Insurance Corporation (LPS). In this case, LPS has implemented strict requirements for the Banks that participate as its members, enabling customers to get certainty about the funds they save in the event something undesirable occurs to the Bank.

Furthermore, the Bank continuously manages all customer data with a high level of prudence. More specifically, the Bank guarantees the security of deposits and the confidentiality of customer data by complying with and being bound by the following regulations:

1. Law No. 7 of 1992 on Banking, and its amendments in Law No. 10 of 1998;
2. Law of the Republic of Indonesia No. 27 of 2022 on Personal Data Protection;
3. Law No. 4 of 2023 on Financial Sector Development and Strengthening;
4. Bank Indonesia Regulation No. 2/19/PBI/2000 on Requirements and Procedures for Giving Order or Written Permission to Disclose Banking Information;
5. Bank Indonesia Regulation No. 3 of 2023 on Consumer Protection of Bank Indonesia; and
6. Financial Services Authority Regulation No. 22 of 2023 on Consumer and Community Protection in the Financial Services Sector.

The Bank also actively reminds customers to always take preventive measures in maintaining the security of their personal data and deposits. Below are some suggestions recommended by the Bank:

Keamanan Bertransaksi Transaction Security	
Simpan Kartu ATM **Keep the ATM Card**	Kartu ATM adalah akses termudah menuju dana yang ada di rekening anda, untuk itu pastikan kartu ATM anda tersimpan dengan baik dan tidak dipinjamkan kepada orang lain. ATM card is the easiest access to your account, so make sure your ATM card is kept properly and do not lend it to other people.
PIN dan *Password* Milik Pribadi **PIN and Password are Personal**	Pelaksanaan penilaian *peer evaluation* dilakukan oleh setiap anggota Dewan Komisaris terhadap anggota Dewan Komisaris lainnya. The peer evaluation assessment is conducted by each member of the Board of Commissioners against other members of the Board of Commissioners.
Tidak Menandatangani Dokumen Kosong **Not Signing Blank Documents**	Dalam kondisi apapun, jangan pernah menandatangani formulir/slip kosong. Pastikan seluruh informasi di formulir/slip kosong sudah benar dan sesuai dengan kebutuhan anda. Under no circumstances should you sign a blank form/slip. Make sure that all information on the blank form/slip is correct and fit to your needs.
Gunakan *Internet Banking* dan *Mobile Banking* **Use Internet Banking and Mobile Banking**	Aktifkan fasilitas *Internet Banking* dan *Mobile Banking* (IBMB) anda, selain memudahkan transaksi perbankan, dengan IBMB anda dapat selalu memonitor rekening secara tepat waktu. Activate your Internet Banking and Mobile Banking (IBMB) facilities. In addition to facilitating banking transactions, IBMB can always help monitor your accounts in a timely manner.
Rutin Cek Saldo **Regularly Check Your Balance**	Lakukan pengecekan saldo anda secara berkala. Jika anda menemukan transaksi mencurigakan segera hubungi *Call Center* untuk meminta penjelasan. Cek saldo dapat dilakukan melalui layanan *Call Center,* IBMB, ATM, dan cetak buku tabungan di kantor cabang terdekat. Check your balance regularly. If you find a suspicious transaction, immediately contact the Call Center to ask for explanation. Balance checking can be done through Call Center, IBMB, ATM services, and print the bank passbook at the nearest branch office.

Atas upaya yang dilakukan, Bank tidak mendapatkan keluhan terkait privasi nasabah di sepanjang tahun 2024.

Due to the efforts made, the Bank did not receive any complaints regarding customer privacy throughout 2024.

Program Keterikatan Nasabah

Bank Victoria secara konsisten mengadakan berbagai kegiatan untuk memperkuat keterikatan dengan para nasabah, menciptakan hubungan yang lebih erat dan personal. Salah satu upaya yang dilakukan adalah melalui program-program menarik yang dirancang untuk meningkatkan kepuasan dan loyalitas nasabah. Beberapa inisiatif yang telah dilaksanakan antara lain program tabungan dengan hadiah langsung, di mana nasabah mendapatkan berbagai keuntungan menarik sebagai apresiasi. Selain itu, Bank juga menyelenggarakan program loyalitas berupa pemberian hadiah kue di hari ulang tahun nasabah, sebagai bentuk perhatian dan penghargaan terhadap kesetiaan nasabah. Tidak hanya itu, Bank juga mengadakan pertemuan rutin melalui acara *customer gathering* yang menghadirkan jajaran Direksi, memungkinkan nasabah untuk berinteraksi langsung dan memberikan masukan, sekaligus memperkuat kepercayaan dan hubungan jangka panjang.

Customer Engagement Program

Bank Victoria consistently holds various activities to strengthen engagement with customers, creating closer and more personal relationships. One of the efforts made is through attractive programs designed to increase customer satisfaction and loyalty. Some of the initiatives implemented include a savings program with direct prizes, in which customers get various attractive benefits as appreciation. Moreover, the Bank holds a loyalty program in form of giving cake gifts on customers' birthdays, as a form of attention and appreciation for customer loyalty. Not only that, the Bank also holds regular meetings through customer gathering events that present the Board of Directors, allowing customers to interact directly and provide input, while strengthening trust and long-term relationships.

Evaluasi Produk dan Jasa

[POJK F.27] [POJK F.29]

Wealth and Liabilities Product Conventional and Digital Development memiliki tugas dan tanggung jawab untuk terus mengelola dan mengembangkan produk dan jasa keuangan Bank. Bank memastikan bahwa seluruh produk dan jasa keuangan yang diluncurkan telah memperoleh persetujuan Bank Indonesia maupun Otoritas Jasa Keuangan. Setiap terdapat produk dan jasa keuangan baru yang akan diluncurkan akan dievaluasi oleh pemilik produk *(owner)*, dipresentasikan pada Komite Produk melalui proses penilaian risiko (*risk assessment*) oleh Satuan Kerja Manajemen Risiko, uji kepatuhan oleh Divisi Kepatuhan, yang ditinjau dan diawasi oleh Direksi.

Pada tahun 2024, seluruh (100%) produk dan layanan Bank telah dievaluasi. Selain itu, tidak terdapat produk dan jasa keuangan Bank yang ditangguhkan atau ditarik kembali setelah diluncurkan.

Evaluation of Products and Services

[POJK F.27] [POJK F.29]

Wealth and Liabilities Product Conventional and Digital Development has the duty and responsibility to continuously manage and develop the Bank's financial products and services. The Bank ensures that all financial products and services launched have obtained approval from Bank Indonesia and the Financial Services Authority. Every new financial product and service to be launched will be evaluated by the product owner, presented to the Product Committee through risk assessment process by Risk Management Work Unit, compliance test by Compliance Division, which are reviewed and supervised by the Board of Directors.

In 2024, all (100%) of the Bank's products and services were evaluated. Additionally, none of the Bank's financial products and services were suspended or withdrawn after launch.

Survei Kepuasan Nasabah [POJK F.30]

Pengukuran indeks kepuasan nasabah dilakukan Bank dalam rangka mengevaluasi kualitas produk dan layanan. Pengukuran kepuasan nasabah tersebut dilakukan setiap semester/awal periode triwulan 1 (satu) dan triwulan 3 (tiga) di masing-masing kantor cabang. Selanjutnya, hasilnya akan dikumpulkan di kantor pusat untuk proses evaluasi akhir. Berdasarkan hasil pengukuran dalam kurun waktu 3 (tiga) tahun, kepuasan nasabah Bank ditunjukkan sebagai berikut:

Customer Satisfaction Survey [POJK F.30]

The Bank measures the customer satisfaction index to evaluate the quality of its products and services. The customer satisfaction measurement is conducted every semester/beginning of the 1st (first) and 3rd (third) quarter periods at each branch office. Then, the results will be collected at the head office for the final evaluation process. Based on the measurement results over a period of 3 (three) years, the Bank's customer satisfaction is shown as follows:

Indikator	2024	2023	2022	Indicator
Teller (Grooming, Behavior, Skill, and Product Knowledge)	**92**	90	85	Teller (Grooming, Behavior, Skill, and Product Knowledge)
Customer Service (Behavior, Skill, Product Knowledge, and Cross Selling)	**92**	90	85	Customer Service (Behavior, Skill, Product Knowledge, and Cross Selling)
Security (Grooming, Behavior, Skill, and Product Knowledge)	**92**	90	85	Security (Grooming, Behavior, Skill, and Product Knowledge)
Eksterior dan Interior Kantor Cabang	**80**	75	75	Exterior and Interior of Branch Offices
Rata-Rata Hasil	**89.00**	**86.25**	**82.50**	**Average Results**
Kategori	**Baik** Good	**Baik** Good	**Baik** Good	**Category**

Sarana Pengaduan Nasabah

Bank Victoria menyediakan berbagai sarana untuk memudahkan nasabah menyampaikan pengaduan terkait produk dan layanan yang digunakan. Dengan dukungan sistem *online* yang dikelola oleh Direktorat Operasional, nasabah dapat melaporkan keluhan melalui beberapa saluran, termasuk *Call Center* 24 jam di nomor 1500977, *e-mail* di customercare@victoriabank.co.id, serta *Customer Service* di seluruh kantor cabang. Selain itu, nasabah juga dapat menggunakan aplikasi Bank Victoria yang tersedia di Playstore dan Appstore, sehingga akses pengaduan menjadi lebih praktis dan fleksibel.

Sistem pengaduan nasabah Bank dirancang untuk mempermudah nasabah dalam melacak status penyelesaian keluhan di setiap kantor cabang Bank Victoria. Dalam menangani setiap pengaduan, Bank memastikan validitas laporan dan berkomitmen menyelesaikannya dengan ketegasan dan ketepatan waktu, sesuai dengan *Standar Service Level Agreement* (SLA) yang telah ditetapkan. Untuk memberikan transparansi, Bank Victoria juga secara berkala menyajikan data mengenai jumlah pengaduan yang diterima dan ditindaklanjuti sebagai bagian dari komitmen terhadap pelayanan yang optimal. Berikut jumlah pengaduan yang diterima Bank dalam kurun waktu 3 (tiga) tahun:

Customer Complaint Channel

Bank Victoria provides various facilities to facilitate customers to submit complaints related to the products and services that are used. With the support of an online system managed by the Operational Directorate, customers can report complaints through several channels, including the 24-hour Call Center at 1500977, email at customercare@victoriabank.co.id, and Customer Service at all branch offices. Furthermore, customers can use Bank Victoria application available on Playstore and Appstore, thereby making access to complaints more practical and flexible.

The Bank's customer complaint system is designed to enable customers to track the status of complaint resolution at each Bank Victoria branch office. In handling each complaint, the Bank ensures the report's validity and is committed to strictly settling it in a timely manner according to the Standard Service Level Agreement (SLA) established. To provide transparency, Bank Victoria also periodically presents data on the number of complaints received and followed up as part of its commitment to optimal services. The following is the number of complaints received by the Bank within a period of 3 (three) years:

Jenis Pengaduan Type of Complaint	2024					2023			2022		
	Jumlah Keluhan Total Complaint	Selesai Settled		Sedang Ditindaklanjuti On Follow Up		Jumlah Keluhan Total Complaint	Selesai Settled		Jumlah Keluhan Total Complaint	Selesai Settled	
		Jumlah Total	%	Jumlah Total	%		Jumlah Total	%		Jumlah Total	%
Transaksi Gagal di ATM Failed Transaction at ATM	**80**	**79**	**98.75**	**1**	**1.25**	113	113	100.00	108	108	100.00
Internet/Mobile Banking	**597**	**594**	**99.50**	**3**	**0.50**	405	405	100.00	762	762	100.00
Internet Banking Business	**5**	**5**	**100.00**	**-**	**-**	11	11	100.00	4	4	100.00
Tabungan Savings Account	**7**	**7**	**100.00**	**-**	**-**	1	1	100.00	1	1	100.00
EDC	**1**	**1**	**100.00**	**-**	**-**	5	5	100.00	2	2	100.00
Deposito Time Deposits	**3**	**3**	**100.00**	**-**	**-**	-	-	-	-	-	-
Kredit Pembiayaan Modal Kerja Working Capital Financing Loans	**6**	**6**	**100.00**	**-**	**-**	2	2	100.00	1	1	100.00
Total	**699**	**695**	**99.43**	**4**	**0.57**	**537**	**537**	**100.00**	**878**	**878**	**100.00**

Pengelolaan *Human Capital* yang Berkualitas

Pertumbuhan bisnis membutuhkan dukungan *Human Capital* (HC) yang kompeten. Bank mengelola HC dari rekrutmen hingga akhir karier dengan tujuan menciptakan HC berkualitas yang memberikan keunggulan kompetitif. Strategi HC disesuaikan dengan visi, misi, dan dinamika industri. Pengelolaan dimulai dari memastikan struktur organisasi mendukung pencapaian target secara efektif dan efisien, serta ketersediaan jumlah HC yang memadai. Selain jumlah, kualitas dan kompetensi HC juga diprioritaskan. Perencanaan pengembangan HC dilakukan secara transparan dan terukur, serta dimonitor oleh manajemen untuk memastikan kesesuaiannya dengan rencana strategis.

Quality Human Capital Management

Business growth requires the support of competent Human Capital (HC). The Bank manages HC from recruitment to career end with the aim of generating quality HC that provides competitive advantages. HC strategy is adjusted to the vision, mission, and dynamics of the industry. The management begins by ensuring that the organizational structure supports the effective and efficient achievement of targets, as well as the availability of an adequate number of HC. Apart from the number, the quality and competence of HC are also prioritized. HC development planning is carried out transparently and measurably, and is monitored by the management to ensure its compliance with the strategic plans.

Kebijakan Pengelolaan *Human Capital*

Bank Victoria telah menyusun panduan pengelolaan HC yang tertuang dalam Kebijakan *Human Capital Management*. Kebijakan ini disahkan dan diperbarui melalui Surat Keputusan Direksi No. 004/SK-DIR/01/24 tanggal 8 Januari 2024 tentang Kebijakan *Human Capital Management* dan Surat Keputusan Direksi No. 005/SK-DIR/01/24 tanggal 8 Januari 2024 tentang Standar Operasional Prosedur *Human Capital Management*.

Selain itu, Bank juga berkomitmen membangun hubungan industrial yang harmonis dan berkualitas antara karyawan dan Bank. Implementasi dari hubungan industrial tersebut berlandaskan Surat Keputusan Direktur Jenderal Pembinaan Hubungan Industrial dan Jaminan Sosial Tenaga Kerja No. Kep.4/HI.00.00/00.0000.230404006/B/VII/2023 tanggal 18 Juli 2023 tentang Pengesahan Peraturan Perusahaan PT Bank Victoria International Tbk. Peraturan ini akan diperbarui secara berkala sesuai perkembangan regulasi ketenagakerjaan.

Keberagaman di Bank Victoria

Bank Victoria menjunjung tinggi keberagaman dengan menciptakan lingkungan kerja yang inklusif bagi semua karyawan, tanpa memandang latar belakang suku, ras, agama, atau gender. Bank percaya bahwa keberagaman perspektif memperkaya inovasi dan pengambilan keputusan dalam setiap aspek operasional. Melalui kebijakan yang adil dan setara, Bank Victoria terus mendukung pengembangan karyawan dari berbagai budaya dan keahlian.

Hak Asasi Manusia [S-09]

Bank Victoria selalu menghormati hak asasi setiap karyawan dengan menerapkan kebijakan yang adil terkait waktu kerja dan pemberian izin, seperti yang diuraikan sebagai berikut:

1. Bank menerapkan jam kerja yang proporsional sesuai dengan standar, serta menetapkan waktu kerja lembur dilengkapi fasilitas yang disesuaikan dengan kebutuhan operasional;
2. Setiap karyawan Bank Victoria diberikan izin untuk menjalankan ibadah sesuai dengan kepercayaan yang diyakini;
3. Karyawan Bank diizinkan untuk meninggalkan pekerjaan dengan tetap menerima gaji penuh karena:
   a. Peristiwa khusus, yaitu pernikahan karyawan, karyawan menikahkan anak, suami/istri/anak/menantu/orang tua/mertua/anggota dalam 1 (satu) rumah meninggal dunia, kelahiran anak, istri karyawan mengalami keguguran kandungan, khitanan anak, pembaptisan anak;
   b. Sakit, yaitu sakit dengan surat dokter, sakit tanpa surat dokter selama 1 (satu) hari dan sakit dengan rawat inap;
   c. Keperluan pribadi yang penting, mendadak, dan tidak dapat diwakilkan; dan
   d. Mengalami halangan di luar kemampuan karyawan.
4. Karyawan yang telah bekerja di Bank selama 1 (satu) tahun secara terus menerus dapat mengambil cuti tahunan dengan tetap menerima gaji penuh. Lamanya cuti tahunan diatur berdasarkan jabatan karyawan, berdasarkan ketentuan yang berlaku di Bank.

Human Capital Management Policy

Bank Victoria has prepared HC management guidelines as outlined in the Human Capital Management Policy. This policy has been ratified and updated through the Board of Directors' Decision Letter No. 004/SK-DIR/01/24 dated 8 January 2024 on the Human Capital Management Policies and Board of Directors' Decision Letter No. 005/SK-DIR/01/24 dated 8 January 2024 on Standard Operating Procedures for Human Capital Management.

Furthermore, the Bank is committed to building harmonious and quality industrial relations between employees and the Bank. The implementation of such industrial relations is based on the Decree of the Director General of Development of Industrial Relations and Social Security for Workers No. Kep.4/HI.00.00/00.0000.230404006/B/VII/2023 dated 18 July 2023 on Approval of Company Regulations of PT Bank Victoria International Tbk. This regulation will be updated periodically in accordance with developments in employment regulations.

Diversity in Bank Victoria

Bank Victoria upholds diversity by creating an inclusive work environment for all employees, regardless of their ethnicity, race, religion, or gender. The Bank believes that diversity of perspectives enriches innovation and decision-making in every aspect of operations. Through a fair and equal policy, Bank Victoria continues to support the development of employees from various cultures and expertise.

Human Rights [S-09]

Bank Victoria always honors the human rights of every employee by implementing fair policies regarding working hours and granting of leave, as described below:

1. The Bank implements proportional work hours, follows standards, and determines overtime hours and overtime facilities adjusted to the operational requirements;
2. Each employee of Bank Victoria is allowed to practice worship according to the respective belief;
3. The Bank gives its employees permission to leave work while still receiving full salary for:
   a. Special events, i.e. employee's marriage, marriage of employee's child, death of employee's husband/wife/child/child-in-law/parent/parent-in-law/other family member living in employee's household, child birth, employee's wife experiencing miscarriage, circumcision of child, baptism of child;
   b. Sick, i.e. illness with doctor's note, illness without doctor's reference letter for 1 (one) day, and illness requiring hospitalization;
   c. Urgent personal matter, sudden necessity that cannot be represented by others; and
   d. Experiencing obstacles beyond employee's control.
4. Employees who have worked in the Bank for 1 (one) consecutive year can take annual leave with full salary payment. The length of annual leave is determined based on employee's position, according to regulations applied at the Bank.

Kepatuhan Terhadap Praktik Kerja tanpa Tenaga Kerja Anak dan Tenaga Kerja Paksa [POJK F.19] [S-10]

Bank tidak mempekerjakan karyawan di bawah umur, tidak memberlakukan kerja paksa pada karyawan, dan senantiasa mematuhi ketentuan dan peraturan perundang-undangan terkait ketenagakerjaan. Bank juga berkomitmen dalam memberikan hak-hak karyawan, seperti pemberian gaji, cuti, dan remunerasi sesuai dengan standar industri dan kinerja karyawan tersebut. Selain itu, Bank memberlakukan waktu kerja yang wajar sesuai dengan peraturan ketenagakerjaan. Bank juga memberikan keleluasaan dan memfasilitasi kegiatan-kegiatan (seni, budaya, dan olahraga) yang mengedepankan kebersamaan untuk membangun solidaritas antar karyawan.

Pada tahun 2024, tidak terdapat laporan atau pengaduan terkait pelanggaran pekerja anak atau praktik kerja paksa. Hal ini juga tercermin dari data rentang usia karyawan yang menunjukkan tidak adanya karyawan di bawah usia 18 tahun.

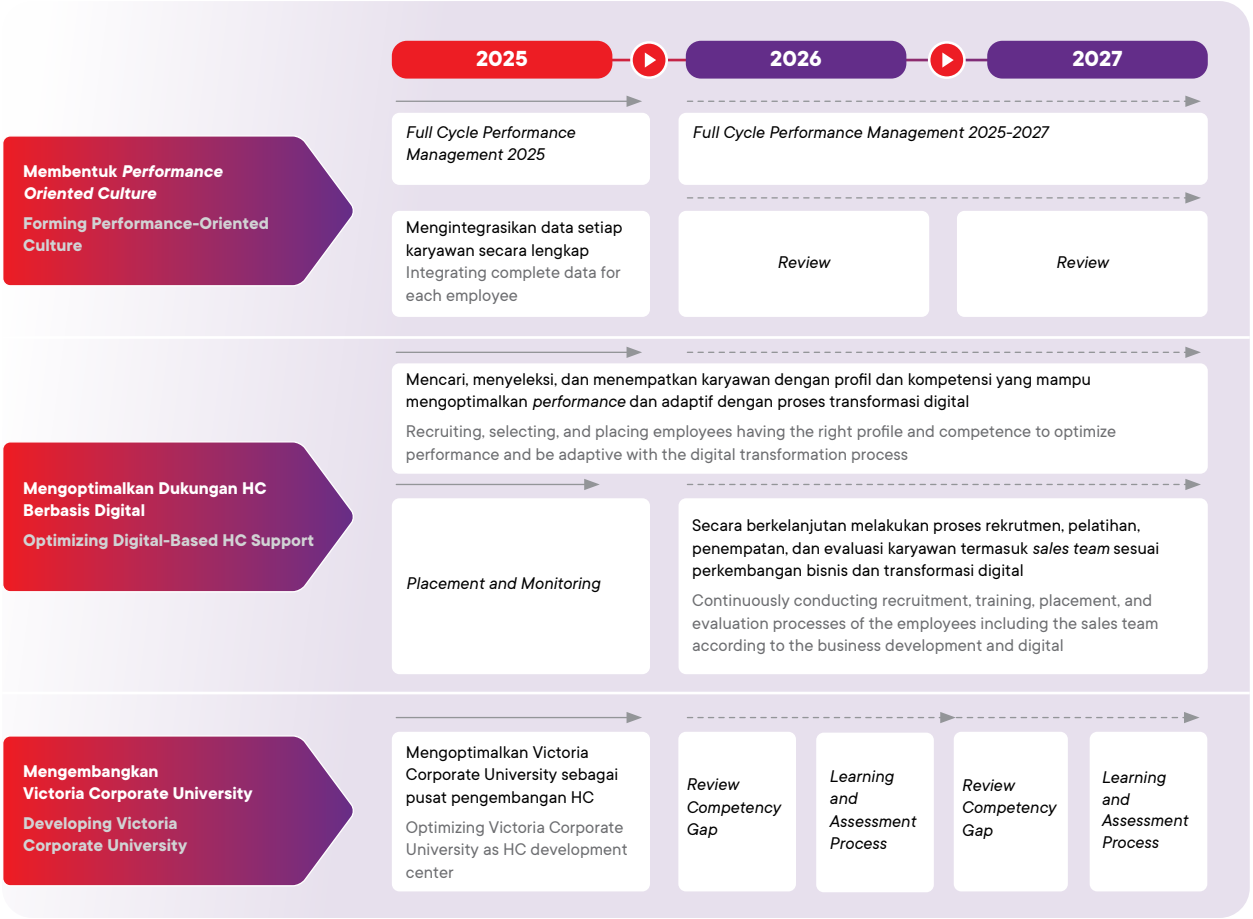
Compliance with Zero Child Labor and Forced Labor Employment Practice [POJK F.19] [S-10]

The Bank does not employ underage employees, does not impose forced labor on employees, and always complies with the provisions and laws and regulations related to employment. The Bank is also committed to providing employee rights, such as providing salary, leave, and remuneration in accordance with industry standards and employee performance. Furthermore, the Bank enforces reasonable working hours in accordance with employment regulations. The Bank also provides flexibility and facilitates activities (art, culture, and sports) that promote solidarity among employees.

In 2024, there were no reports or complaints related to child labor violations or forced labor practices. This is also reflected in the employee age range data which shows no employees under the age of 18.

Roadmap Pengelolaan *Human Capital*

Human Capital Management Roadmap



Perencanaan Kebutuhan *Human Capital*

Bank Victoria setiap tahunnya melakukan perencanaan kebutuhan HC berdasarkan analisis persyaratan, standar formasi, serta evaluasi kinerja dan potensi karyawan. Dalam rencana HC untuk tahun 2025, Bank fokus pada optimalisasi dan sinergi seluruh tenaga kerja yang ada. Proses rekrutmen dilakukan untuk mengisi posisi yang kosong akibat pengunduran diri, promosi, atau rotasi karyawan.

Kesetaraan Kesempatan Bekerja [POJK F.18]

Dalam proses rekrutmen HC, Bank menjamin kesetaraan kesempatan kerja berdasarkan prinsip hak asasi manusia, tanpa diskriminasi berdasarkan suku, gender, agama, atau status sosial. Bank juga memberikan prioritas kepada tenaga kerja lokal sebagai calon karyawan. Berdasarkan Kebijakan *Human Capital Management* dan Standar Operasional Prosedur *Human Capital Management*, Bank merekrut karyawan tetap, kontrak, dan *outsourcing*. Proses seleksi meliputi beberapa tahapan, yaitu:

1. Seleksi administrasi;
2. Tes kemampuan dan kepribadian;
3. Wawancara oleh *Human Capital Management* dan *end user;*
4. Tes psikologi dan tes simulasi pekerjaan; dan
5. Penilaian oleh pihak independen.

Kesetaraan Gender [S-01]

Sebagai bagian dari komitmen perusahaan terhadap keberlanjutan dan tanggung jawab sosial, Bank Victoria mengelompokkan karyawan berdasarkan gender di berbagai level jabatan. Hal ini dilakukan untuk memastikan representasi yang setara bagi karyawan pria dan wanita di setiap jenjang karier, mulai dari *entry-level* hingga *executive-level*. Langkah ini juga merupakan bagian dari upaya menciptakan keseimbangan gender dan mendukung peluang yang adil serta inklusif bagi seluruh karyawan. Berikut distribusi karyawan berdasarkan gender selama 3 (tiga) tahun terakhir:

Planning for Human Capital Needs

Bank Victoria annually plans HC needs based on analysis of requirements, formation standards, and evaluation of employee performance and potential. In HC plan for 2025, the Bank focuses on optimizing and synergizing the entire manpower. Recruitment process is conducted to fill the vacant positions due to employee resignation, promotion, or rotation.

Equal Employment Opportunity [POJK F.18]

In HC recruitment process, the Bank guarantees equal employment opportunities based on human rights principles, with no discrimination on ethnicity, gender, religion, or social status. The Bank also gives priority to local manpower as prospective employees. Based on the Human Capital Management Policy and Standard Operating Procedures for Human Capital Management, the Bank recruits permanent, contract, and outsourcing employees. The selection process includes several phases, namely:

1. Administration selection;
2. Capability and personality test;
3. Interview by Human Capital Management and end user;
4. Psychological test and job simulation test; and
5. Assessment by independent party.

Gender Equality [S-01]

As part of the company's commitment to sustainability and social responsibility, Bank Victoria groups employees by gender at various job levels. This is conducted to ensure equal representation of male and female employees at every career level, from entry-level to executive-level. This step is also part of the effort to create gender balance and support fair and inclusive opportunities for all employees. The following is the distribution of employees by gender for the past 3 (three) years:

Level Jabatan Level of Position	2024				2023				2022			
	Pria Male	%	Wanita Female	%	Pria Male	%	Wanita Female	%	Pria Male	%	Wanita Female	%
Entry-Level	**294**	**39.41**	**266**	**35.66**	281	39.41	251	35.20	279	40.55	238	34.59
Middle-Level	**50**	**6.70**	**49**	**6.57**	50	7.01	44	6.17	44	6.40	44	6.40
Senior-Level	**33**	**4.42**	**42**	**5.63**	33	4.63	42	5.89	32	4.65	39	5.67
Executive-Level	**10**	**1.34**	**2**	**0.27**	10	1.40	2	0.28	9	1.31	3	0.44
Total	**387**	**51.88**	**359**	**48.12**	**374**	**52.45**	**399**	**47.55**	**364**	**52.91**	**324**	**47.09**

Karyawan Berdasarkan Gender dan Kelompok Usia [S-02]

Selain kesetaraan gender, distribusi karyawan berdasarkan kelompok usia di setiap level jabatan juga menjadi indikator penting untuk menggambarkan keberagaman dan inklusivitas dalam organisasi. Berikut jumlah karyawan pria dan wanita di setiap jenjang karier, mulai dari *entry-level* hingga *executive-level,* yang dikelompokkan berdasarkan rentang usia:

Employees by Gender and Age Group [S-02]

Apart from gender equality, employee distribution by age group at each job level is also an important indicator to describe diversity and inclusivity in the organization. The following is the number of male and female employees at each career level, from entry-level to executive-level, grouped by age range:

Rentang Usia (Tahun) Age Range (Years Old)	2024								Total Karyawan Total Employees
	Entry-Level		*Middle-Level*		*Senior-Level*		*Executive-Level*		
	Pria Male	Wanita Female	Pria Male	Wanita Female	Pria Male	Wanita Female	Pria Male	Wanita Female	
18-25	**21**	**55**	**-**	**-**	**-**	**-**	**-**	**-**	**76**
26-35	**100**	**132**	**5**	**9**	**3**	**-**	**-**	**-**	**249**
36-45	**116**	**64**	**18**	**24**	**9**	**11**	**-**	**1**	**243**
46-55	**50**	**11**	**18**	**13**	**11**	**23**	**4**	**1**	**131**
>55	**7**	**4**	**9**	**3**	**10**	**8**	**6**	**-**	**47**

Rentang Usia (Tahun) Age Range (Years Old)	2023								Total Karyawan Total Employees
	Entry-Level		*Middle-Level*		*Senior-Level*		*Executive-Level*		
	Pria Male	Wanita Female	Pria Male	Wanita Female	Pria Male	Wanita Female	Pria Male	Wanita Female	
18-25	26	50	-	-	-	-	-	-	**76**
26-35	90	125	5	8	3	1	-	-	**232**
36-45	117	61	21	23	6	11	-	1	**240**
46-55	44	13	18	11	14	20	4	1	**125**
>55	4	2	6	2	10	10	6	-	**40**

Rentang Usia (Tahun) Age Range (Years Old)	2022								Total Karyawan Total Employees
	Entry-Level		*Middle-Level*		*Senior-Level*		*Executive-Level*		
	Pria Male	Wanita Female	Pria Male	Wanita Female	Pria Male	Wanita Female	Pria Male	Wanita Female	
18-25	22	34	-	-	-	-	-	-	**56**
26-35	95	138	6	6	3	-	-	-	**248**
36-45	115	49	14	24	5	11	-	3	**221**
46-55	45	16	21	11	12	19	3	-	**127**
>55	2	1	3	3	12	9	6	-	**36**

Kebijakan Pelecehan Seksual dan/atau Non-Diskriminasi [S-08]

Bank Victoria memastikan tempat kerja yang aman, bermartabat, dan bebas dari pelecehan seksual maupun diskriminasi dalam bentuk apa pun. Kebijakan ini bertujuan melindungi setiap karyawan dari tindakan yang merugikan secara fisik, emosional, atau profesional, termasuk pelecehan seksual, baik verbal maupun non-verbal, serta diskriminasi berbasis gender, ras, agama, atau kondisi lainnya.

Kebijakan ini berpedoman pada Surat Keputusan Direktur Jenderal Pembinaan Hubungan Industrial dan Jaminan Sosial Tenaga Kerja No. Kep.4/HI.00.00/00.0000.230404006/B/VII/2023 tanggal 18 Juli 2023 tentang Pengesahan Peraturan Perusahaan PT Bank Victoria International Tbk serta Surat Keputusan Direksi No. 024A/SK-DIR/02/23 tentang Pedoman Kode Etik Perilaku Karyawan PT Bank Victoria International Tbk. Kebijakan tersebut diperkuat melalui sosialisasi internal, penyediaan mekanisme pelaporan yang mudah diakses, dan proses penanganan yang adil serta transparan.

Sexual Harassment and/or Non-Discrimination Policies [S-08]

Bank Victoria ensures a safe, dignified workplace free from sexual harassment or discrimination in any form. This policy aims to protect every employee from actions that are physically, emotionally, or professionally detrimental, including verbal and non-verbal sexual harassment, as well as discrimination on gender, race, religion, or other conditions.

This policy is guided by the Directorate General of Industrial Relations Development and Labor Social Security Decree No. Kep.4/HI.00.00/00.0000.230404006/B/VII/2023 dated 18 July 2023 on Approval of Company Regulations of PT Bank Victoria International Tbk and Board of Directors' Decision Letter No. 024A/SK-DIR/02/23 on Employee's Code of Conduct of PT Bank Victoria International Tbk. The policy is strengthened through internal dissemination, provision of easily accessible reporting mechanisms, and fair and transparent handling processes.

Pengembangan Kompetensi *Human Capital*

[POJK F.22] [S-05]

Sebagai sarana pembelajaran dan pengembangan kompetensi HC, Bank mengembangkan *Victoria Corporate University* (VCU). VCU memiliki misi sebagai berikut:

1. Mengembangkan program pendidikan dan pelatihan berbasis kompetensi;
2. Mengembangkan organisasi dan karyawan pembelajar yang efisien; dan
3. Membentuk *assessment center* serta *talent pool* yang mampu mengidentifikasi dan mengelola pengembangan karier karyawan guna menciptakan *leader* yang kuat.

Selain melalui VCU, Bank Victoria juga melaksanakan pengembangan kompetensi HC melalui serangkaian program pendidikan dan pelatihan yang dirancang untuk memenuhi kebutuhan pengembangan individu. Program pendidikan dan pelatihan tersebut bertujuan mendukung peningkatan kinerja serta kemajuan karier karyawan. Penyusunan program pendidikan dan pelatihan didasarkan pada analisis kebutuhan pelatihan (*training need analysis*) yang dilakukan setiap tahun untuk memastikan relevansi dan efektivitas program.

Berikut informasi mengenai pelaksanaan pengembangan kompetensi yang telah dilakukan pada tahun 2024:

Human Capital Competency Development

[POJK F.22] [S-05]

As a means of learning and developing HC competencies, the Bank has developed Victoria Corporate University (VCU). VCU has missions as follows:

1. Developing competency-based education and training programs;
2. Developing efficient learning organization and employee; and
3. Establishing assessment center and talent pool having the ability to identify and manage employee's career development in order to generate strong leaders.

In addition to VCU, Bank Victoria also carries out HC competency development through a series of education and training programs designed to meet individual development needs. The education and training programs aim to support employee performance improvement and career advancement. The education and training programs are prepared based on a training need analysis conducted annually to ensure program relevance and effectiveness.

The following is information regarding the competency development implemented in 2024:

Jenis Pelatihan Type of Training	Jumlah Pelatihan Total Trainings					Total Pelatihan Total Trainings	Komposisi Composition (%)
	Dewan Komisaris Board of Commissioners	Direksi Board of Directors	Manajer Manager	*Officer*	*Non-Staff*		
Training/Inhouse	11	22	2,710	3,310	250	6,303	68.27
Refreshment Training	5	10	155	269	5	444	4.81
Training/Public	2	8	747	979	19	1,757	19.01
Seminar/Public	2	12	15	16	-	45	0.49
Certification	3	4	162	101	-	270	2.92
Certification Training	-	4	193	218	-	415	4.49
Educational Scholarship	-	-	1	-	-	1	0.01
Total	**23**	**60**	**3,983**	**4,893**	**274**	**9,233**	**100.00**
Komposisi (%) Composition (%)	**0.25**	**0.65**	**43.14**	**52.99**	**2.97**		**100.00**
Biaya Pengembangan Kompetensi (Rp) Competency Development Cost (Rp)							**5,875,651,659**
Rata-Rata Jam Pelatihan per Karyawan (Jam/Karyawan) Average Training Hours per Employee (Hours/Employee)							**5**
Total Karyawan yang Ikut Serta dalam Program Pelatihan Total Employees Participating in Training Programs							**607**
Total Karyawan Total Employees							**746**
Persentase Total Karyawan yang Ikut Serta dalam Program Pelatihan (%) Percentage of Total Employees Participating in Training Programs (%)							**81.37**

Untuk mendukung penyebaran pengetahuan secara menyeluruh dan sistematis, Bank Victoria menerapkan *Knowledge Management* yang dikelola melalui VCU. Inisiatif ini bertujuan mengumpulkan pengetahuan, keterampilan, serta pengalaman kerja karyawan, yang kemudian diakses secara terbuka oleh seluruh tim. *Knowledge Management* dilaksanakan tidak hanya melalui pertemuan tatap muka seperti kelas pelatihan, sesi berbagi, dan sosialisasi, tetapi juga melalui sarana digital seperti *e-learning*, intranet V-Smart, dan Vic-News. Selain itu, VCU juga melakukan evaluasi terhadap efektivitas program pelatihan dan pengembangan HC menggunakan *Form* Evaluasi Pasca Pelatihan. Hasil evaluasi akan menjadi dasar untuk menentukan kebutuhan pelatihan lanjutan serta mengarahkan peningkatan program pengembangan karyawan.

Penilaian Kinerja *Human Capital*

Bank Victoria mengatur penilaian kinerja HC melalui Kebijakan *Human Capital Management* yang ditetapkan dalam Surat Keputusan Direksi No. 004/SK-DIR/01/24 dan Standar Operasional Prosedur *Human Capital Management*, yang dikeluarkan pada 8 Januari 2024 melalui Surat Keputusan No. 005/SK-DIR/01/24. Penilaian kinerja HC dilakukan berdasarkan pencapaian target kerja, pengembangan atau peningkatan kompetensi, serta penerapan nilai-nilai inti Bank Victoria. Proses penilaian ini mengikuti indikator *Key Performance Indicators* (KPI), yang diintegrasikan dengan sistem *Balanced Scorecard* untuk menilai kinerja karyawan serta efektivitas proses bisnis internal.

Penilaian dilakukan 2 (dua) kali setahun untuk mengidentifikasi kekuatan dan area yang perlu diperbaiki dalam kinerja HC, serta untuk mengevaluasi efektivitas sistem yang diterapkan di Bank Victoria. Hasil penilaian menjadi acuan dalam menentukan peningkatan remunerasi, pemberian bonus tahunan, serta penghargaan finansial dan non-finansial, yang disesuaikan dengan kondisi keuangan Bank setiap tahunnya.

Pengembangan Karier *Human Capital*

Pengembangan karier HC di Bank Victoria didasarkan pada prinsip kesetaraan kesempatan (*fair opportunity*) dan panduan manajemen karier yang bijaksana melalui *Prudential Career Management Guideline*. Bank memastikan setiap karyawan memiliki akses yang adil terhadap peluang pengembangan karier, baik melalui promosi jabatan, rotasi, maupun penugasan lintas fungsi.

Sistem pengembangan karier juga dirancang untuk mendorong peningkatan kompetensi dan kinerja HC secara berkelanjutan. Melalui evaluasi berkala dan program pengembangan, HC yang menunjukkan potensi tinggi dan hasil kerja yang unggul akan diprioritaskan untuk menempati posisi-posisi strategis. Bank juga memberikan dukungan berupa pelatihan dan bimbingan untuk membantu HC mencapai tujuan kariernya, sambil memastikan bahwa pengembangan tersebut selaras dengan kebutuhan organisasi dan tujuan bisnis.

To support the comprehensive and systematic knowledge dissemination, Bank Victoria implements Knowledge Management, administered by VCU. This initiative aims to collect employee knowledge, skills, and work experience, which are openly accessible by the entire team. Knowledge Management is implemented not only through face-to-face meetings such as classroom training, sharing sessions, and dissemination, but also through digital media such as e-learning, V-Smart intranet, and Vic-News. Furthermore, VCU also evaluates the effectiveness of HC training and development programs by using Post-Training Evaluation Form. The evaluation result will serve as the basis for determining the requirement for further training and directing enhancement to employee development programs.

Human Capital Performance Assessment

Bank Victoria regulates HC performance assessment through the Human Capital Management Policy stipulated in the Board of Directors' Decision Letter No. 004/SK-DIR/01/24 and the Standard Operating Procedures for Human Capital Management, issued on 8 January 2024 through Decision Letter No. 005/SK-DIR/01/24. HC performance assessment is carried out based on the achievement of work targets, development or improvement of competencies, and implementation of Bank Victoria's core values. This assessment process follows the Key Performance Indicators (KPI), integrated with the Balanced Scorecard system to assess employee performance and the effectiveness of internal business processes.

Assessment is carried out twice in a year to identify strengths and areas that need enhancement in HC performance, as well as to evaluate the effectiveness of system implemented at Bank Victoria. The assessment results are used as a reference in determining remuneration increase, annual bonus, and financial and non-financial rewards, which are adjusted to the Bank's financial condition every year.

Human Capital Career Development

HC career development at Bank Victoria is based on the principle of fair opportunity and prudent career management guidelines through the Prudential Career Management Guideline. The Bank ensures that every employee has fair access to career development opportunities, either through job promotion, rotation, or cross-functional assignments.

The career development system is also designed to encourage continuous enhancement of HC competencies and performance. Through periodic evaluation and development programs, HCs who demonstrate high potential and excellent work results will be prioritized to occupy strategic positions. The Bank also provides supports in form of training and guidance to help HCs achieve their career goals, while ensuring that their development is aligned with the needs of the organization and business objectives.

Informasi jumlah HC yang menerima pengembangan dalam 3 (tiga) tahun terakhir ditunjukkan sebagai berikut:

Information regarding the number of HCs who received development in the past 3 (three) years is shown as follows:

Pengembangan Karier Career Development	Jumlah Karyawan Total Employees								
	2024			2023			2022		
	Pria Male	Wanita Female	Total	Pria Male	Wanita Female	Total	Pria Male	Wanita Female	Total
Promosi ke Jabatan yang Lebih Tinggi Promotion to a Higher Position	**6**	**9**	**15**	8	9	17	13	8	21
Mutasi pada Jenjang yang Selevel Transfer at the Same Level	**19**	**28**	**47**	14	34	48	19	21	40

Human Capital Engagement

Bank Victoria menerapkan *Human Capital Engagement* sebagai indikator untuk mengukur sejauh mana keterlibatan emosional HC terhadap Bank. Untuk meningkatkan keterikatan HC, Bank menyediakan berbagai peluang bagi HC, seperti program pendidikan, pelatihan, serta pengembangan karier melalui promosi, rotasi pekerjaan, dan perluasan tugas. Selain itu, penilaian kinerja dilakukan menggunakan sistem *Balanced Scorecard* yang diterapkan di seluruh tingkatan, mulai dari perusahaan hingga individu. Proses ini dipantau secara berkelanjutan melalui mekanisme *coaching*, *counseling*, dan *controlling*.

Keterlibatan HC juga diperkuat melalui kebijakan remunerasi yang adil dan transparan, di mana penggajian disesuaikan dengan hasil penilaian kinerja, pemeringkatan, dan jenjang jabatan HC. Langkah-langkah tersebut dirancang untuk mendorong kinerja optimal dan meningkatkan rasa memiliki terhadap Bank.

Industrial Relations

Bank Victoria berkomitmen untuk menciptakan lingkungan kerja yang terbuka, positif, dan progresif guna membangun hubungan industrial yang harmonis dan dinamis. Komitmen ini tercermin dalam Peraturan Perusahaan yang telah disahkan oleh Kementerian Tenaga Kerja dan Transmigrasi melalui Surat Keputusan Direktur Jenderal Pembinaan Hubungan Industrial dan Jaminan Sosial Tenaga Kerja No. Kep.4/HI.00.00/00.0000.230404006/B/VII/2023 tertanggal 18 Juli 2023. Peraturan tersebut terus diperbarui secara berkala agar sesuai dengan perubahan regulasi ketenagakerjaan dan perkembangan industri perbankan di Indonesia. Dengan pembaruan ini, Bank memastikan kepatuhan terhadap ketentuan yang berlaku serta menciptakan suasana kerja yang kondusif bagi seluruh karyawan.

Internalisasi Budaya Perusahaan *Human Capital*

Budaya Perusahaan Bank Victoria dirancang untuk mendorong transformasi menuju lingkungan kerja yang lebih profesional, dengan menekankan tahap-tahap seperti *awareness*, *engagement*,

Human Capital Engagement

Bank Victoria applies Human Capital Engagement as an indicator to measure the extent of HC's emotional involvement in the Bank. To increase HC engagement, the Bank provides various opportunities for HC, such as education programs, training, and career development through promotion, job rotation, and job enlargement. Furthermore, performance assessments are carried out by using the Balanced Scorecard system, which is applied at all levels, from the company to individuals. This process is monitored continuously through coaching, counseling, and controlling mechanisms.

HC involvement is also strengthened through a fair and transparent remuneration policy, in which salaries are adjusted to the results of HC performance assessment, ranking, and position level. Such steps are designed to encourage optimal performance and increase a sense of belonging to the Bank.

Industrial Relations

Bank Victoria is committed to creating an open, positive, and progressive work environment to establish harmonious and dynamic industrial relations. This commitment is reflected in the Company Regulation, which has been ratified by the Ministry of Manpower and Transmigration through the Directorate General of Industrial Relations Development and Labor Social Security Decree No. Kep.4/HI.00.00/00.0000.230404006/B/VII/2023 dated 18 July 2023. The regulation is updated periodically to comply with the amendments in employment regulations and the development of banking industry in Indonesia. With this update, the Bank ensures its compliance with the applicable provisions and creates a conducive working atmosphere for all employees.

Internalization of Human Capital Corporate Culture

Corporate Culture at Bank Victoria is designed to encourage transformation towards a more professional work environment, emphasizing phases such as awareness, engagement, acceptance,

acceptance, hingga *ownership*. Untuk mendukung hal ini, Bank melaksanakan berbagai program kerja yang berfokus pada penguatan budaya *intrapreneurship*, peningkatan kinerja, inovasi, dan efisiensi.

and ownership. To support this matter, the Bank implements various work programs that focus on strengthening the culture of intrapreneurship, improving performance, innovation, and efficiency.

Proses transformasi Budaya Perusahaan diwujudkan melalui sosialisasi nilai budaya perusahaan, internalisasi budaya perusahaan, penyesuaian sistem organisasi dengan HC, serta program recognition bagi HC. Program-program ini diterapkan secara konsisten dan berkesinambungan sebagai bagian integral dari kegiatan operasional Bank untuk menciptakan lingkungan kerja yang produktif dan dinamis.

The Corporate Culture transformation process is realized through the dissemination of corporate culture values, internalization of corporate culture, adjustment of organizational systems with HC, and recognition programs for HC. These programs are implemented consistently and continuously as an integral part of the Bank's operational activities to create a productive and dynamic work environment.

Jumlah *Human Capital* [POJK C.3]
Total Human Capital

Uraian Description	2024				2023				2022			
	Pria Male	Wanita Female	Total	%	Pria Male	Wanita Female	Total	%	Pria Male	Wanita Female	Total	%
Level Organisasi **Organizational Level**												
Direksi Boards of Directors	**4**	**1**	**5**	**0.67**	4	1	5	0.70	4	1	5	0.73
Manajemen Management	**89**	**92**	**181**	**24.26**	87	84	171	23.98	78	83	161	23.40
Staf Staff	**294**	**266**	**560**	**75.07**	283	254	537	75.32	282	240	522	75.87
Total	**387**	**359**	**746**	**100.00**	**374**	**339**	**713**	**100.00**	**364**	**324**	**688**	**100.00**
Tingkat Pendidikan **Educational Level**												
Doktor Doctorate	**2**	**-**	**2**	**0.27**	2	-	2	0.28	-	-	-	-
Pascasarjana Post-Graduates	**26**	**10**	**36**	**4.83**	24	12	36	5.05	23	13	36	5.23
Sarjana Graduates	**195**	**241**	**436**	**58.45**	185	223	408	57.22	176	202	378	54.94
Diploma	**29**	**76**	**105**	**14.08**	28	72	100	14.03	29	78	107	15.55
<SMA <High School	**135**	**32**	**167**	**22.39**	135	32	167	23.42	136	31	167	24.27
Total	**387**	**359**	**746**	**100.00**	**374**	**339**	**713**	**100.00**	**364**	**324**	**688**	**100.00**
Status Karyawan **Employment Status**												
Karyawan Tetap Permanent Employee	**212**	**226**	**438**	**58.71**	199	211	410	57.50	193	206	399	57.99
Karyawan Tidak Tetap Non-Permanent Employee	**41**	**131**	**172**	**23.06**	42	127	169	23.70	36	117	153	22.24
Outsourcing	**134**	**2**	**136**	**18.23**	133	1	134	18.80	135	1	136	19.77
Total	**387**	**359**	**746**	**100.00**	**374**	**339**	**713**	**100.00**	**364**	**324**	**688**	**100.00**

Uraian Description	2024				2023				2022			
	Pria Male	Wanita Female	Total	%	Pria Male	Wanita Female	Total	%	Pria Male	Wanita Female	Total	%
Usia **Age**												
>60 Tahun >60 Years Old	**11**	**7**	**18**	**2.41**	7	6	13	1.82	10	5	15	2.18
51–60 Tahun 51–60 Years Old	**43**	**37**	**80**	**10.72**	43	34	77	10.80	38	32	70	10.17
41–50 Tahun 41–50 Years Old	**112**	**49**	**161**	**21.58**	108	47	155	21.74	105	43	148	21.51
31–40 Tahun 31–40 Years Old	**125**	**124**	**249**	**33.38**	129	117	246	34.50	136	127	263	38.23
21–30 Tahun 21–30 Years Old	**95**	**139**	**234**	**31.37**	86	132	218	30.58	74	112	186	27.03
18-20 Tahun 18-20 Years Old	**1**	**3**	**4**	**0.54**	1	3	4	0.56	1	5	6	0.87
Total	**387**	**359**	**746**	**100.00**	**374**	**339**	**713**	**100.00**	**364**	**324**	**688**	**100.00**
Masa Kerja **Years of Services**												
>20 Tahun >20 Years	**15**	**14**	**29**	**3.89**	11	11	22	3.09	9	13	22	3.20
16-20 Tahun 16-20 Years	**30**	**32**	**62**	**8.31**	23	14	37	5.19	32	15	47	6.83
11-15 Tahun 11-15 Years	**58**	**55**	**113**	**15.15**	54	47	101	14.17	40	57	97	14.10
6-10 Tahun 6-10 Years	**84**	**37**	**121**	**16.22**	86	67	153	21.46	99	93	192	27.91
0-5 Tahun 0-5 Years	**200**	**221**	**421**	**56.43**	200	200	400	56.10	184	146	330	47.97
Total	**387**	**359**	**746**	**100.00**	**374**	**339**	**713**	**100.00**	**364**	**324**	**688**	**100.00**

Remunerasi Karyawan [POJK F.20]

Bank memastikan bahwa setiap karyawan dapat menerima haknya sebagaimana yang ditetapkan dalam peraturan perundang-undangan yang berlaku, termasuk terkait pemberian upah minimum. Dalam hal ini, Bank mengacu pada nominal Upah Minimum Regional (UMR) yang diperbaharui setiap tahunnya. Berikut merupakan detail perbandingan nominal UMR yang berlaku di tahun 2024 dengan nominal upah karyawan tetap Bank terendah:

Employee Remuneration [POJK F.20]

The Bank ensures that all employees can receive their rights as stipulated in the applicable laws and regulations, including those related to the provision of minimum wage. In this case, the Bank refers to the Regional Minimum Wage (UMR) nominal that is updated every year. The following is a detailed comparison of the nominal of UMR applicable in 2024 with the nominal of wage of the lowest permanent Bank employees:

Wilayah Region	Upah Karyawan Tetap Terendah Lowest Permanent Employee's Wage (Rp)	Upah Minimum Regional Regional Minimum Wage (Rp)	Rasio Upah Karyawan Tetap Terendah Dibandingkan UMR Ratio of the Lowest Permanent Employee's Wage to UMR (%)
Bandung	4,209,500	4,209,309	100.00
Bogor	4,814,000	4,813,988	100.00
Denpasar	3,097,000	3,096,823	100.01
DKI Jakarta	5,067,500	5,067,381	100.00
Manado	3,591,000	3,590,858	100.00
Makassar	3,643,500	3,643,321	100.00

Wilayah Region	Upah Karyawan Tetap Terendah Lowest Permanent Employee's Wage (Rp)	Upah Minimum Regional Regional Minimum Wage (Rp)	Rasio Upah Karyawan Tetap Terendah Dibandingkan UMR Ratio of the Lowest Permanent Employee's Wage to UMR (%)
Medan	3,769,500	3,769,082	100.01
Semarang	3,244,000	3,243,969	100.00
Surabaya	4,725,500	4,725,479	100.00
Surakarta	2,269,500	2,269,070	100.02

Hak Cuti

Bank Victoria memberikan hak cuti tahunan kepada karyawan sesuai dengan peraturan ketenagakerjaan yang berlaku, sebagai bagian dari upaya menjaga keseimbangan antara kehidupan kerja dan pribadi. Selain cuti tahunan, karyawan juga berhak atas cuti khusus, seperti cuti melahirkan dan cuti sakit. Dengan kebijakan ini, Bank memastikan kesejahteraan dan kebutuhan karyawan tetap menjadi prioritas.

Informasi jumlah karyawan yang menerima hak cuti di tahun 2024 ditunjukkan sebagai berikut:

Leave Rights

Bank Victoria provides annual leave rights to employees in line with the applicable employment regulations, as part of an effort to maintain a balance between work and personal life. In addition to annual leave, employees are also entitled to special leave, such as maternity leave and sick leave. With this policy, the Bank ensures that the employees' welfare and needs remain a priority.

Information on the number of employees who received leave rights in 2024 is shown as follows:

Uraian Description	Pria Male	Wanita Female	Jumlah Total
Karyawan yang berhak mendapat cuti Employees eligible to take leave	336	309	**645**
Karyawan yang mengambil hak cuti Employees taking leave	323	315	**638**
Karyawan yang kembali bekerja pada periode pelaporan setelah cuti berakhir Employees returning to work in the reporting period after leave ends	336	309	**645**
Karyawan yang kembali bekerja setelah cuti berakhir, yang masih dipekerjakan 12 (dua belas) bulan setelah kembali bekerja Employees returning to work after leave ends, still employed 12 (twelve) months after returning to work	336	309	**645**

Program Pensiun

Sebagai wujud komitmen dalam memenuhi hak-hak tenaga kerja, Bank menjalankan program pensiun bagi karyawan yang telah mencapai usia 55 (lima puluh lima) tahun. Program pensiun Bank diatur sesuai dengan Kebijakan *Human Capital Management* serta Standar Operasional Prosedur Prosedur *Human Capital Management*, memastikan proses yang transparan dan terstruktur. Selain itu, Bank memberikan kesempatan bagi para pensiunan untuk kembali bekerja sebagai karyawan kontrak, jika diperlukan, sehingga pensiunan tetap dapat berkontribusi pada Bank.

Tingkat Pergantian Karyawan [S-03]

Tingkat pergantian karyawan menjadi perhatian penting untuk menjaga keberlanjutan tenaga kerja yang berkualitas. Tingkat pergantian ini mencakup jumlah karyawan yang *resign* atau diberhentikan, serta jumlah karyawan baru yang direkrut

Pension Program

As the manifestation of commitment to fulfilling labor rights, the Bank implements pension program for employees who have entered the age of 55 (fifthy). The Bank's pension program is stipulated in accordance with the Human Capital Management Policy and Standard Operating Procedures for Human Capital Management, ensuring a transparent and structured process. Furthermore, the Bank provides opportunities for retirees to return to work as contract employees, if necessary, so that the retirees can continue to give contribution to the Bank.

Employee Turnover Rate [S-03]

Employee turnover rate is an important concern to maintain the sustainability of a quality manpower. This turnover rate covers the number of employees who resign or are dismissed, as well as the number of new employees recruited to replace vacant positions.

untuk menggantikan posisi yang kosong. Berikut informasi mengenai tingkat pergantian karyawan Bank Victoria dalam waktu 3 (tiga) tahun terakhir:

The following is information regarding Bank Victoria's employee turnover rate in the past 3 (three) years:

Uraian Description	2024		2023		2022	
	Total	%	Total	%	Total	%
Karyawan *Resign*/Pemutusan Hubungan Kerja Employee Resigning/Termination of Employment	**119**	**15.95**	157	22.02	165	23.98
Karyawan Baru/Pengganti New/Substitute Employee	**152**	**20.38**	182	25.53	159	23.11

Tenaga Kerja Sementara [S-04]

Tenaga kerja sementara merupakan tenaga kerja yang tidak memiliki hubungan kerja langsung dengan Bank Victoria tetapi tetap berkontribusi melalui kontrak dengan pihak ketiga, seperti kontraktor atau konsultan. Tenaga kerja dalam kategori ini memainkan peran penting dalam mendukung operasional perusahaan, baik melalui tugas teknis maupun administrasi. Informasi jumlah tenaga kerja sementara dan persentase terhadap total tenaga kerja dalam 3 (tiga) tahun terakhir disajikan dalam tabel berikut:

Temporary Workers [S-04]

Temporary workers are workers who do not have a direct working relationship with Bank Victoria but still give contribution through contracts with third parties, such as contractors or consultants. Workers in this category play an important role in supporting the company's operations, both through technical and administrative duties. Information on the number of temporary workers and the percentage of total workforce in the past 3 (three) years is presented in the following table:

Uraian	2024	2023	2022	Description
Total Pegawai Perusahaan yang Dipegang oleh Kontraktor dan/atau Konsultan	-	-	-	Total Company Employees Held by Contractors and/or Consultants
Total Karyawan	-	-	-	Total Employees
Persentase Total Pegawai Sementara (%)	**-**	**-**	**-**	**Percentage of Total Temporary Employees (%)**

Strategi Pengelolaan *Human Capital* Tahun 2025

Setiap tahun, Bank merancang rencana kerja pengelolaan HC untuk memastikan implementasi yang berkelanjutan dan sesuai dengan tujuan strategis Bank. Pada tahun 2025, Bank telah menetapkan berbagai inisiatif dan program pengembangan HC yang akan dijalankan, yaitu:

1. Penyempurnaan dan pengembangan penyusunan *Key Performance Indicator* (KPI) *Balance Score Card* melalui *Human Resource Information System* (HRIS) guna meningkatkan transparansi dan efektivitas penilaian kinerja;
2. Pengkinian Peraturan Perusahaan *Online* melalui Pppkb.Kemnaker.Go.Id untuk memastikan kepatuhan terhadap regulasi ketenagakerjaan yang berlaku;
3. Pemenuhan kewajiban sertifikasi kompetensi sesuai ketentuan yang berlaku, mencakup:
   a. Sertifikasi Manajemen Risiko;
   b. Sertifikasi Sistem Pembayaran dan Pengelolaan Uang Rupiah (SPPUR);
   c. Sertifikasi *Treasury Dealer*;
   d. Sertifikasi Audit; dan
   e. Sertifikasi Kepatuhan.
4. Penyelenggaraan program pelatihan penyegaran terkait sertifikasi kompetensi guna menjaga standar keahlian karyawan;

Human Capital Management Strategy in 2025

Every year, the Bank designs HC management work plans to ensure a sustainable implementation that is in accordance with the Bank's strategic objectives. For 2025, the Bank has established various HC development initiatives and programs to be implemented, namely:

1. Refining and developing Key Performance Indicator (KPI) Balance Score Card preparation through Human Resource Information System (HRIS) to increase transparency and effectiveness of performance assessment;
2. Updating Company Regulations Online through Pppkb.Kemnaker.Go.Id to ensure compliance with the applicable employment regulations;
3. Fulfilling competency certification obligations in accordance with the applicable provisions, including:
   a. Risk Management Certification;
   b. Payment System Certification and Rupiah Money Management (SPPUR);
   c. Dealer Treasury Certification;
   d. Audit Certification; and
   e. Compliance Certification.
4. Organizing refreshment training programs related to competency certification to maintain employees' skill standards;

5. Pelaksanaan program pelatihan, baik secara *inhouse training* yang diselenggarakan secara internal bekerja sama dengan vendor *training*, maupun *training* publik yang sesuai dengan rencana kerja pelatihan dan kebutuhan divisi kerja;
6. Program pelatihan induksi bagi karyawan yang baru (*onboarding*) guna mempercepat adaptasi dan pemahaman terhadap budaya kerja serta sistem operasional Bank;
7. Pelatihan sosialisasi terkait pengkinian kebijakan, sistem prosedur, dan produk Bank, untuk memastikan pemahaman yang selaras di seluruh unit kerja;
8. Pelaksanaan program pelatihan wajib (*mandatory*) bagi seluruh karyawan, termasuk pelatihan *anti-fraud*, pelatihan anti-pencucian uang dan pendanaan terorisme, pelatihan perlindungan data pribadi, dan pelatihan perlindungan konsumen;
9. Pemenuhan kebutuhan karyawan serta pelaksanaan program rotasi dan mutasi guna mendukung penyegaran dan pengembangan karier karyawan; dan
10. Penyampaian pelaporan ketenagakerjaan kepada berbagai pihak terkait, termasuk seperti Otoritas Jasa Keuangan, Bank Indonesia, Kementerian Ketenagakerjaan, Dinas Tenaga Kerja dan Transmigrasi Wilayah, Kantor Pajak, dan Lembaga terkait lainnya.

Kesehatan dan Keselamatan Kerja serta Lingkungan Kerja yang Aman dan Layak

[POJK F.21] [S-11]

Bank berkomitmen menciptakan lingkungan kerja yang aman, nyaman, dan kondusif bagi seluruh karyawan, guna memenuhi hak karyawan sekaligus menjaga tingkat produktivitas. Komitmen tersebut diwujudkan dengan desain tata ruang kerja yang dirancang cermat, dilengkapi dengan pencahayaan yang optimal, ventilasi yang baik, dan pengaturan suhu ruangan yang nyaman melalui penggunaan pendingin udara. Selain itu, Bank juga memastikan tersedianya sarana keselamatan kerja yang memadai untuk mengurangi risiko kecelakaan di tempat kerja.

Untuk menjaga keamanan dan keselamatan, Bank rutin melakukan pemeliharaan fasilitas penting seperti *lift*, mengingat intensitas penggunaannya yang tinggi. Monitor komputer dengan fitur anti-radiasi juga digunakan untuk melindungi kesehatan mata karyawan. Di setiap lantai gedung, Bank telah memasang rencana evakuasi darurat yang mudah diakses oleh karyawan, sebagai bagian dari kesiapsiagaan menghadapi situasi tak terduga seperti kebakaran.

Selain aspek keselamatan fisik, Bank juga menunjukkan perhatian terhadap kesejahteraan karyawan melalui program Jaminan Sosial Tenaga Kerja (Jamsostek), yang meliputi Jaminan Hari Tua (JHT), Jaminan Kecelakaan Kerja (JKK), Jaminan Kematian (JKM), dan Jaminan Pensiun (JP). Untuk memberikan perlindungan kesehatan yang lebih luas, Bank menyediakan asuransi kesehatan yang mencakup keluarga karyawan, termasuk suami/istri dan

5. Holding training programs, both in-house training, organized internally in cooperation with training vendors, and public-related training in accordance with training work plans and work division needs;
6. Induction training programs for new (onboarding) employees to accelerate adaptation and understanding of the Bank's work culture and operational systems;
7. Dissemination training related to update of the Bank's policies, system procedures, and products, to ensure a harmonious understanding across all work units;
8. Holding mandatory training programs for all employees, including anti-fraud training, anti-money laundering and counter-terrorist financing training, personal data protection training, and consumer protection training;
9. Fulfilling employee needs and implementing rotation and transfer programs to support employee career refreshment and development; and
10. Submitting employment reports to related parties, including Financial Services Authority, Bank Indonesia, Ministry of Manpower, Regional Manpower and Transmigration Service, Tax Office, and other relevant Institutions.

Occupational Health and Safety and Safe and Decent Work Environment [POJK F.21] [S-11]

The Bank is committed to creating a safe, comfortable, and conducive work environment for all employees, in order to fulfill employee rights while maintaining their productivity levels. Such commitment is realized through a carefully thought-out workspace design, equipped with optimal lighting, good ventilation, and comfortable room temperature setting through the use of air conditioning. Furthermore, the Bank also ensures the availability of adequate work safety facilities to reduce the risk of occupational accidents.

To maintain security and safety, the Bank regularly maintains important facilities such as lift, considering its high intensity of use. Computer monitors with anti-radiation features are also used to protect employee's healthy vision. On each floor in the building, the Bank has installed emergency evacuation plans that are easily accessible to employees, as part of preparedness for unexpected situations such as fire.

Apart from the physical safety aspect, the Bank also shows concern for employee welfare through Workers' Social Security (Jamsostek) program, which includes Old Age Savings Program (JHT), Occupational Accident Program (JKK), Death Benefit Program (JKM), and Pension Program (JP). To provide broader health protection, the Bank provides health insurance that covers employee families, including husband/wife and children. This

anak-anak. Cakupan asuransi ini meliputi layanan rawat inap, rawat jalan, perawatan gigi, serta fasilitas melahirkan bagi pasangan karyawan. Melalui langkah-langkah tersebut, Bank berupaya untuk memastikan kesejahteraan dan keselamatan karyawan di setiap aspek kehidupan kerja.

insurance coverage includes inpatient, outpatient, dental care, and maternity facilities for employee's spouse. Through such steps, the Bank strives to ensure employees' welfare and safety in every aspect of their work life.

Penanganan Keadaan Darurat Keselamatan Kerja

Bank Victoria memulai penanganan keadaan darurat dengan terlebih dahulu mengidentifikasi berbagai potensi risiko kecelakaan di area operasional. Risiko tersebut meliputi insiden kebakaran atau ledakan, bencana alam seperti banjir, gempa bumi, tsunami, dan letusan gunung berapi, serta ancaman keamanan lainnya seperti sabotase, terorisme, ancaman bom, dan kerusuhan. Berdasarkan hasil identifikasi, Bank merumuskan prosedur darurat yang komprehensif untuk memastikan kesiapsiagaan dan respons cepat dalam menghadapi situasi tak terduga di seluruh wilayah operasional.

Occupational Safety Emergency Handling

Bank Victoria begins emergency handling by first identifying various potential accident risks in operational areas. These risks include fire or explosion incidents, natural disasters such as flood, earthquake, tsunami, and volcanic eruption, as well as other security threats such as sabotage, terrorism, bomb threat, and riots. Based on the identification results, the Bank formulates comprehensive emergency procedures to ensure preparedness and rapid response in dealing with unexpected situations in all operational areas.

Tingkat Kecelakaan Kerja [S-06]

Dalam 3 (tiga) tahun terakhir, Bank berhasil mempertahankan catatan tanpa adanya insiden kecelakaan kerja. Pencapaian ini mencerminkan komitmen Bank untuk menciptakan lingkungan kerja yang aman dan nyaman bagi seluruh karyawan, dengan menerapkan standar keselamatan dan terus meningkatkan prosedur keamanan di setiap aspek operasional.

Occupational Accident Rate [S-06]

In the past 3 (three) years, the Bank has successfully maintained a record of zero occupational accident incidents. This achievement reflects the Bank's commitment to creating a safe and comfortable work environment for all employees, by implementing safety standards and continuously improving security procedures in every operational aspect.

Sarana Pengaduan Terkait Pengelolaan HC [S-07]

Bank Victoria berkomitmen untuk menciptakan lingkungan kerja yang aman, inklusif, dan menghormati HAM. Sebagai bagian dari sistem tata kelola yang baik, Bank Victoria menyediakan mekanisme pengaduan yang transparan dan akuntabel untuk menangani masalah terkait ketenagakerjaan, K3, serta pelanggaran HAM.

Melalui saluran pengaduan ini, Bank Victoria memastikan bahwa setiap laporan atau keluhan yang berhubungan dengan diskriminasi, pelanggaran hak pekerja, atau potensi pelanggaran lainnya dapat ditangani secara profesional dan sesuai dengan ketentuan yang berlaku. Selama 3 (tiga) tahun terakhir Bank tidak menerima adanya pengaduan terkait pengelolaan HC.

Complaint Channel Related to HC Management [S-07]

Bank Victoria is committed to creating a work environment that is safe, inclusive, and respectful of human rights. As part of its good governance system, Bank Victoria provides a transparent and accountable complaint mechanism to handle issues related to employment, OHS, and human rights violations.

Through this complaint channel, Bank Victoria ensures that any reports or complaints related to discrimination, violation of workers' rights, or other potential violations can be handled professionally and in accordance with the applicable provisions. In the past 3 (three) years, the Bank did not receive any complaints related to HC management.

Berkembang Bersama Masyarakat

Bank menerapkan program tanggung jawab sosial perusahaan (*corporate social responsibility*/CSR) sebagai bagian dari komitmen Bank terhadap pembangunan berkelanjutan. Melalui program ini, Bank berkomitmen untuk memberikan kontribusi positif secara maksimal kepada masyarakat, terutama masyarakat sekitar di wilayah operasional melalui berbagai inisiatif mengenai pengembangan sosial dan kemasyarakatan. Pelaksanaan program CSR Bank mengacu pada Surat Keputusan Direksi No. 027/SK-DIR/04/21 tanggal 29 April 2021 tentang *Corporate Social Responsibility* (CSR).

Developing Together with the Community

The Bank implements corporate social responsibility (CSR) programs as part of the Bank's commitment to sustainable development. Through these programs, the Bank is committed to providing utmost positive contributions to the community, particularly the surrounding community in operational areas through various initiatives on social and community development. CSR program implementation at the Bank refers to the Board of Directors' Decision Letter No. 027/SK-DIR/04/21 dated 29 April 2021 on Corporate Social Responsibility (CSR).

Visi dan Misi CSR
CSR Vision and Mission

VISI Vision

Menjadi mitra dalam meningkatkan kualitas pendidikan, kesehatan, dan kesejahteraan masyarakat untuk menjadi lebih baik serta ikut berperan dalam membangun hubungan antara perusahaan dengan masyarakat yang berkelanjutan.

To become a partner in improving the quality of education, health, and welfare of the community to be better and play a role in building sustainable relationships between the company and communities.

MISI Mission

- Berpartisipasi dalam mengurangi keterbelakangan sosial kemasyarakatan sesuai dengan kapasitas dan kemampuan perusahaan.
- Berpartisipasi dalam meningkatkan kualitas pendidikan dasar bagi anak-anak sekolah.
- Berupaya untuk mengimplementasikan cara-cara konservasi energi dalam rutinitas pekerjaan sehari-hari.
- Berupaya untuk mendukung kegiatan serta aktivitas positif melalui kerja sama yang lebih dekat dengan berbagai komunitas di bidang perbankan.
- Ikut serta berperan dalam program pemberdayaan masyarakat secara berkelanjutan.

- To participate in reducing social backwardness in accordance with the Company's capacity and capabilities.
- To participate in improving the quality of basic education for school children.
- To make efforts to implement energy conservation methods in daily work routines.
- To make efforts to support positive activities through closer cooperation with various communities in the banking sector.
- To continuously participate in community empowerment program.

Penggunaan Tenaga Kerja Lokal [POJK F.25]

Penggunaan tenaga kerja lokal menjadi salah satu upaya Bank untuk mendorong terciptanya kesejahteraan masyarakat sekitar. Saat ini, Bank mempunyai 68,36% karyawan yang berasal dari masyarakat sekitar.

Use of Local Manpower [POJK F.25]

The use of local manpower is one effort of the Bank to promote the establishment of welfare for the surrounding community. Currently, the Bank has 68.36% of its employees coming from the surrounding community.

Investasi Terhadap Komunitas [POJK F.25] [S-12]

Melalui investasi terhadap komunitas, Bank Victoria mendukung pengembangan masyarakat dengan melaksanakan program-program jangka panjang, seperti pembangunan fasilitas umum untuk MCK untuk masyarakat Kampung Depok Barakan, Desa Bojong Timur, Kecamatan Bojong, Purwakarta, Jawa Barat serta pelaksanaan program pemberdayaan masyarakat untuk pemberdayaan lingkungan sekitar melalui kegiatan peningkatan sarana fasilitas sanitasi kesehatan. Rincian kegiatan yang mendapatkan investasi terhadap komunitas sebagai berikut:

Investment in the Community [POJK F.25] [S-12]

By investing in the community, Bank Victoria supports community development by conducting long-term programs, such as the construction of public facilities for MCK for the community of Kampung Depok Barakan, Bojong Timur Village, Bojong Subdistrict, Purwakarta, West Java and the community empowerment programs held to empower the surrounding environment by improving health sanitation facilities. Details of activities that receive investment in the community are as follows:

Kegiatan Activity	Lokasi Location	Penerima Manfaat Beneficiaries (Orang / People)
Pembangunan fasilitas umum MCK bekerja sama dengan SMA Lab School **Construction of public restroom facilities in collaboration with Lab School Senior High School**	Kampung Depok Barakan, Desa Bojong Timur, Kecamatan Bojong, Purwakarta, Jawa Barat Depok Barakan Village, East Bojong Village, Bojong District, Purwakarta, West Java	Masyarakat Kampung Depok Barakan, Desa Bojong Timur, Kecamatan Bojong, Purwakarta, Jawa Barat Community of Depok Barakan Village, East Bojong Village, Bojong District, Purwakarta, West Java

Biaya Kegiatan Investasi Terhadap Komunitas

Dalam kurun waktu 3 (tiga) tahun terakhir, biaya yang dikeluarkan Bank untuk kegiatan investasi terhadap komunitas sebagai berikut:

Cost of Investment Activities to the Community

In the past 3 (three) years, the costs incurred by the Bank for investment activities in the community are as follows:

2024	2023	2022
19,477,900	**5,500,000**	**88,967,970**
dalam Rupiah / in Rupiah	dalam Rupiah / in Rupiah	dalam Rupiah / in Rupiah

Sumbangan kepada Organisasi Nirlaba

[POJK F.25] [S-12]

Selain itu, Bank Victoria juga memberikan sumbangan kepada organisasi nirlaba yang memiliki misi sosial tertentu. Dukungan ini diwujudkan dalam bentuk donasi untuk program pelestarian lingkungan, bantuan untuk program pendidikan seperti beasiswa dan pengadaan alat belajar. Rincian kegiatan yang mendapatkan sumbangan kepada organisasi nirlaba sebagai berikut:

Donation to Non-Profit Organizations

[POJK F.25] [S-12]

In addition to investment in the community, Bank Victoria also provides donation to non-profit organizations that have specific social missions. This support is realized in form of donation for environmental conservation programs, assistance for educational programs such as scholarships, and procurement of learning tools. Details of activities for which donations were made to non-profit organizations are as follows:

Kegiatan Activity	Lokasi Location	Penerima Manfaat Beneficiaries (Orang / People)
Kegiatan sosial, kemasyarakatan, kesehatan, dan lingkungan hidup **Social, community, health, and environmental activities**	Jl. Pasir Putih Raya No. 28, Kelurahan Ancol, Kecamatan Pademangan, Jakarta Utara Jl. Pasir Putih Raya No. 28, Ancol Village, Pademangan District, North Jakarta	Yayasan Artha Graha Peduli Artha Graha Peduli Foundation
Penyaluran paket sembako **Distribution of staple food packages**	Yayasan Tjo Soe Kong Tanjung Kait Tj. Anom, Kecamatan Mauk, Kabupaten Tangerang, Banten Tjo Soe Kong Tanjung Kait Foundation Tj. Anom, Mauk District, Tangerang Regency, Banten	300 orang 300 people
Pemberian santunan **Provision of compensation**	Yayasan Khairul Amal Jl. Jenderal Gatot Subroto Kav. 32-34, Gatot Subroto, Jakarta Selatan Khairul Amal Foundation Jl. Jenderal Gatot Subroto Kav. 32-34, Gatot Subroto, South Jakarta	Yayasan Khairul Amal, Almarhum Robby Wahyudi, Almarhum Muhamad Yusup, Almarhum Dhany Prambudi, dan Almarhum Meksi Tri Khairul Amal Foundation, the late Robby Wahyudi, the late Muhamad Yusup, the late Dhany Prambudi, and the late Meksi Tri
Pemberian bingkisan untuk apresiasi dan penghargaan terhadap karyawan **Provision of gift packages for appreciation and recognition of employees**	Gedung Graha BIP Lantai 10 Jl. Gatot Subroto Kav. 23, Jakarta Selatan Graha BIP Building 10th Floor Jl. Gatot Subroto Kav. 23, South Jakarta	746 orang 746 people
Donor darah **Blood donation**	Gedung Graha BIP Lantai 10 Jl. Gatot Subroto Kav. 23, Jakarta Selatan Graha BIP Building 10th Floor Jl. Gatot Subroto Kav. 23, South Jakarta	100 orang 100 people
Bantuan dana **Financial assistance**	Yayasan Delapan Sabda Bahagia Jl. Kamboja No. 27, Depok, Kecamatan Pancoran Mas, Kota Depok, Jawa Barat Delapan Sabda Bahagia Foundation Jl. Kamboja No. 27, Depok, Pancoran Mas District, Depok City, West Java	60 orang 60 people
Pemberian dana pendidikan dan operasional **Provision of educational and operational funds**	Yayasan STT Iman Jakarta Jl. Wijaya I No. 29-31 6, RT 2 RW 4, Petogogan, Kecamatan Kebayoran Baru, Jakarta Selatan STT Iman Jakarta Foundation Jl. Wijaya I No. 29-31 6, RT 2 RW 4, Petogogan, Kebayoran Baru District, South Jakarta	Yayasan STT Iman STT Iman Foundation
Pemberian dana sosial **Provision of social funds**	Kepak Sayap Rajawali Muda Xaverian	Siswa Frater Students of Frater

Biaya Kegiatan Sumbangan kepada Organisasi Nirlaba

Dalam kurun waktu 3 (tiga) tahun terakhir, biaya yang dikeluarkan Bank untuk kegiatan sumbangan kepada organisasi nirlaba sebagai berikut:

Cost of Donation to Non-Profit Organizations

In the past 3 (three) years, the costs incurred by the Bank for donation activities to non-profit organizations are as follows:

2024	2023	2022
1,189,173,620	174,110,888	149,247,694
dalam Rupiah / in Rupiah	dalam Rupiah / in Rupiah	dalam Rupiah / in Rupiah

Program Magang Internasional untuk Mahasiswa Asing

Sebagai bentuk komitmen dalam mendukung pengembangan pendidikan global dan pertukaran pengetahuan lintas negara, Bank Victoria menjalankan program magang internasional bagi mahasiswa asing. Pada tahun 2024, Bank menerima 2 (dua) orang mahasiswa magang dari luar negeri yang ditempatkan di bidang *sales & trading, investment banking,* dan *marketing,* serta *project management* dengan tujuan memberikan pemahaman praktis mengenai industri perbankan di Indonesia serta membekali peserta dengan pengalaman profesional yang relevan secara global.

Melalui inisiatif ini, Bank Victoria tidak hanya turut serta dalam mendorong peningkatan kualitas sumber daya manusia internasional, tetapi juga memperkuat hubungan antarbangsa dalam konteks pembelajaran dan pengembangan kapasitas generasi muda. Program ini menjadi bagian dari kontribusi Bank dalam mendukung pencapaian tujuan pembangunan berkelanjutan, khususnya di bidang pendidikan.

International Internship Program for Foreign Students

As a form of commitment to supporting the development of global education and cross-country knowledge exchange, Bank Victoria carries out international internship program for foreign students. In 2024, the Bank accepted 2 (two) overseas interns who were placed in sales & trading, investment banking, and marketing, and project management with the aim of providing practical understanding of banking industry in Indonesia and equipping participants with globally relevant professional experience.

Through this initiative, Bank Victoria not only participates in encouraging the improvement of quality of international human resources, but also strengthening international relations in the context of learning and developing the capacity of younger generation. This program is part of the Bank's contribution to supporting the achievement of sustainable development goals, particularly in education.

Dampak Operasi Terhadap Masyarakat Sekitar [POJK F.23]

Secara keseluruhan, kegiatan operasional Bank tidak menimbulkan efek negatif bagi masyarakat sekitar. Sebaliknya, melalui produk keuangan dan berbagai inisiatif CSR, Bank memberikan dampak positif yang bermanfaat bagi komunitas setempat. Kehadiran Bank Victoria membuka peluang kerja bagi masyarakat melalui proses rekrutmen yang transparan, serta menciptakan kesempatan bagi pengusaha lokal untuk menjadi pemasok atau vendor barang dan jasa yang dibutuhkan Bank.

Dengan demikian, keberadaan Bank turut berkontribusi pada peningkatan taraf hidup dan pertumbuhan ekonomi di sekitar wilayah operasional. Selain menciptakan lapangan kerja dan mendukung pelaku usaha lokal, masyarakat juga mendapatkan manfaat dari berbagai program sosial yang dijalankan oleh Bank sebagai bagian dari komitmen Bank terhadap tanggung jawab sosial perusahaan.

Impact of Operations on Surrounding Community [POJK F.23]

In all, the Bank's operational activities have no negative impact on the surrounding community. On the contrary, through financial products and various CSR initiatives, the Bank has a positive impact that is beneficial to the local community. The presence of Bank Victoria opens up employment opportunities for the community through a transparent recruitment process, and creates opportunities for local entrepreneurs to become suppliers or vendors of goods and services needed by the Bank.

Thus, the Bank's presence also contributes to improving the standard of living and economic growth in the operational areas. In addition to creating employment opportunity and supporting local business players, the community also gains benefits from various social programs carried out by the Bank as part of the Bank's commitment to corporate social responsibility.

Sarana Pengaduan Masyarakat [POJK F.24]

Sarana pengaduan masalah terkait kegiatan CSR dapat disampaikan melalui:

1. *Call Center* yang beroperasi 24 jam melalui panggilan 1500977;
2. *E-mail* customercare@victoriabank.co.id; dan
3. *Customer service* yang berada di cabang-cabang terdekat yang secara berkala akan dilaporkan kepada kantor pusat terkait data pengaduan dan tingkat penyelesaiannya.

Community Complaint Channel [POJK F.24]

Complaints on issues related CSR activities can be submitted through the following means:

1. 24 Hour Call Center 1500977;
2. E-mail customercare@victoriabank.co.id; and
3. Customer services at the nearest branch offices that regularly submit the report to the head office regarding the complaint data and settlement status.

Seluruh pengaduan yang disampaikan akan ditindaklanjuti dengan baik dan objektif, tanpa adanya tindakan intimidasi. Dalam 3 (tiga) tahun terakhir, Bank tidak menerima pengaduan terkait kegiatan CSR yang telah dilaksanakan.

All complaints submitted will be followed up properly and objectively, without any intimidation. In the past 3 (three) years, the Bank did not receive any complaints related to CSR activities that were carried out.

Rantai Pasok yang Bertanggung Jawab

Bank memahami peran penting mitra usaha dalam mendukung kelancaran operasional. Oleh karena itu, Bank menerapkan proses seleksi ketat untuk memastikan hanya bermitra dengan pihak yang mematuhi undang-undang dan peraturan yang berlaku. Proses ini membantu Bank menjaga standar kualitas tinggi di seluruh kegiatan operasional. Dengan menjalin kerja sama dengan mitra yang memiliki nilai dan komitmen yang sejalan, Bank dapat membangun jaringan yang solid, mendukung pencapaian tujuan keberlanjutan, serta terus memberikan layanan berkualitas terbaik kepada nasabah.

Responsible Supply Chain

The Bank understands the important role of business partners in supporting smooth operations. Therefore, the Bank implements a strict selection process to ensure that the Bank only partners with parties that comply with the applicable laws and regulations. This process helps the Bank maintain high quality standards throughout its operational activities. By cooperating with partners who share the same values and commitments, the Bank can build a solid network, support the achievement of sustainability goals, and continue to provide best quality services to customers.

Keberlanjutan Kinerja Lingkungan Hidup
Environmental Performance Sustainability

Kegiatan Usaha Berwawasan Lingkungan

Bank Victoria berkomitmen mendukung kegiatan usaha berwawasan lingkungan dengan menyalurkan kredit kepada sektor-sektor yang menerapkan prinsip keberlanjutan. Melalui pembiayaan ini, Bank mendorong pengembangan bisnis yang ramah lingkungan, bertanggung jawab sosial, dan memiliki tata kelola yang baik. Bank Victoria meyakini bahwa investasi pada usaha berkonsep berkelanjutan merupakan langkah strategis untuk mendorong pertumbuhan ekonomi jangka panjang.

Environmentally-Friendly Business Activities

Bank Victoria is committed to supporting environmentally friendly business activities by lending to sectors that apply sustainability principles. Through this financing, the Bank encourages the development of businesses that are environmentally friendly, socially responsible, and have good governance. Bank Victoria believes that investing in sustainable businesses is a strategic step to encourage long-term economic growth.

Pembiayaan dengan Pertimbangan Aspek Lingkungan Hidup

Bank mensyaratkan kepemilikan dokumen AMDAL bagi (calon) debitur yang mengelola lahan seluas 25 hektare atau lebih sebagai bagian dari persyaratan pengajuan kredit. Kebijakan ini diatur dalam Keputusan Direksi No. 004/SK-DIR/12/24 tanggal 16 Desember 2024 tentang Standar Operasional Prosedur Perkreditan *Commercial* dan SME PT Bank Victoria International Tbk. Melalui dokumen AMDAL, Bank dapat mengevaluasi dampak lingkungan dari aktivitas usaha debitur, memastikan praktik yang berkelanjutan, dan memutuskan penyaluran kredit hanya kepada (calon) debitur yang memenuhi kriteria lingkungan yang ditetapkan. Berikut informasi mengenai penyaluran kredit dengan pertimbangan aspek lingkungan selama 3 (tiga) tahun terakhir:

Financing by Considering the Environmental Aspect

The Bank requires ownership of an AMDAL document for (potential) debtor who manages land of 25 hectares or more as part of the requirements for applying loan. This policy is stipulated in the Board of Directors' Decision Letter No. 004/SK-DIR/12/24 dated December 16, 2024 concerning Standard Operating Procedures for Commercial and Consumer Loans of PT Bank Victoria International Tbk. Through AMDAL document, the Bank can evaluate the environmental impact of the debtor's business activities, ensure sustainable practices, and decide lending only to (potential) debtors fulfilling the established environmental criteria. The following is information on lending with due observance of the environmental aspect for the past 3 (three) years:

(dalam juta Rupiah / in million Rupiah)

Debitur Debtor	2024	2023	2022
PT Perkebunan Nusantara III (Persero)	-	-	210,787
PT Ungaran Sari Garment	**72,427**	59,269	82,435
PT Lamipak Primula Ind	-	-	19,367
PT IGP International	**73,711**	81,667	89,257
PT Nada Surya Tunggal	-	-	24,702
PT Paberik Tekstil Kasrie	-	-	8,000
PT Pratama Unggul S	**42,480**	23,233	9,920
PT Kwala Gunung	**123,747**	118,921	146,433
PT Sweet Greens Indonesia	**81,345**	47,783	11,482
PT Mitra Niaga Cornindo	-	21,753	23,952
PT Mitra Sewatama Raya	-	11,871	59,534
PT Gaharu	**59,900**	68,541	77,106
PT Bina Mitra Makmur	**107,375**	137,376	-
PT Samudera Parama Avirodha	**25,497**	28,889	31,972
Henry Maknawi	**15,482**	23,928	-
Total	**601,964**	**623,231**	**794,947**

Penggunaan Material yang Ramah Lingkungan

[POJK F.5]

Operasional Bank Victoria tidak banyak memerlukan bahan baku selain untuk kebutuhan administrasi dan kantor. Meski demikian, Bank tetap memperhatikan penggunaan material yang ramah lingkungan untuk peralatan dan perlengkapan kantor. Bank juga mendorong seluruh karyawan untuk mengurangi pemakaian produk sekali pakai yang tidak bisa didaur ulang sebagai upaya untuk menekan volume sampah di tempat pembuangan akhir. Untuk mendukung inisiatif ini, Bank menjalankan berbagai program, antara lain:

1. Mengganti air minum kemasan dengan penyediaan gelas atau tumbler untuk mengurangi penggunaan plastik sekali pakai;
2. Memanfaatkan kertas bekas sesuai kebutuhan dan memaksimalkan penyimpanan dokumen secara digital untuk mengurangi penggunaan kertas; dan
3. Menggunakan kantong atau *goodie bag* ramah lingkungan dalam berbagai acara dan sebagai *merchandise* atau barang promosi kepada nasabah.

Use of Environmentally Friendly Material

[POJK F.5]

The operations at Bank Victoria do not require many raw materials other than for administrative and office purposes. Nevertheless, the Bank continues to pay attention to the use of environmentally friendly materials for office equipment and supplies. The Bank also encourages all employees to reduce the use of single-use products unable to be recycled as an effort to reduce the volume of waste in landfills. To support this initiative, the Bank carries out various programs, including:

1. Replacing bottled drinking water with the provision of glasses or tumblers to reduce the use of single-use plastics;
2. Utilizing used paper as needed and maximizing digital document storage to reduce paper use; and
3. Using environmentally friendly bag or goodie bag in various events and as merchandise or promotional items for customers.

Efisiensi Penggunaan Energi

[POJK F.6] [POJK F.7] [E-03]

Kebutuhan energi untuk menunjang kegiatan operasional perbankan dipenuhi Bank Victoria melalui 2 (dua) sumber utama, yaitu bahan bakar minyak (BBM) dan listrik. BBM diperoleh Bank dari gerai Stasiun Pengisian Bahan Bakar Umum (SPBU) terdekat dan digunakan untuk kendaraan operasional serta genset sebagai cadangan energi saat listrik padam.

Using Energy Efficiently

[POJK F.6] [POJK F.7] [E-03]

Energy needs to support banking operational activities are met by Bank Victoria through 2 (two) main sources, fuel (BBM) and electricity. BBM is obtained by the Bank from the nearest Gas Station (SPBU) and is used for operational vehicles and generators as energy reserves when the power is out.

Untuk kebutuhan listrik, Bank Victoria memperoleh pasokan dari Perusahaan Listrik Negara (PT PLN), yang digunakan untuk mengoperasikan berbagai peralatan elektronik seperti komputer, sistem pencahayaan, pendingin ruangan, dan perangkat lainnya di kantor. Listrik yang digunakan Bank Victoria termasuk dalam kategori listrik yang dikonsumsi secara tidak langsung karena pasokan tersebut dibeli dari pihak ketiga (PT PLN) dan tidak dihasilkan langsung oleh Bank.

For electricity needs, Bank Victoria obtains supplies from the State Electricity Company (PT PLN), which is used to operate various electronic equipment such as computers, lighting systems, air conditioners, and other devices in the office. The electricity used by Bank Victoria is categorized as indirectly consumed electricity due to the supply that is purchased from a third party (PT PLN) and is not generated directly by the Bank.

Saat ini, Bank Victoria belum menggunakan listrik yang dikonsumsi secara langsung, seperti dari pembangkit listrik tenaga surya atau sumber energi terbarukan lainnya. Hal ini dikarenakan penggunaan listrik dari PLN dinilai lebih praktis, efisien, dan sesuai dengan kebutuhan operasional perbankan yang bersifat konsisten dan terjamin. Selain itu, investasi untuk membangun pembangkit listrik mandiri membutuhkan sumber daya yang besar dan pengelolaan yang kompleks, yang saat ini belum menjadi prioritas utama Bank.

To date, Bank Victoria has not used directly consumed electricity, such as from solar power plants or other renewable energy sources. This is because the use of electricity from PLN is considered more practical, efficient, and in accordance with the operational needs of banking which are consistent and guaranteed. Furthermore, investment to build an independent power plant requires large resources and complex management, which is currently not a top priority for the Bank.

Ke depannya, Bank Victoria terus mengevaluasi dan mempertimbangkan implementasi sumber energi terbarukan sebagai bagian dari komitmen untuk mendukung keberlanjutan lingkungan dan efisiensi energi dalam operasional perbankan. Informasi penggunaan energi Bank Victoria selama 3 (tiga) tahun terakhir diuraikan sebagai berikut:

Going forward, Bank Victoria will continue to evaluate and consider the implementation of renewable energy sources as part of its commitment to supporting environmental sustainability and energy efficiency in banking operations. Information on energy use at Bank Victoria for the past 3 (three) years is outlined as follows:

Uraian	Satuan Unit	2024	2023	2022	Description
Listrik	GJ	**4,914.20**	4,774.83	4,442.55	Electricity
	J	**4,914,200,000,000**	4,774,830,000,000	4,442,550,000,000	
BBM*	GJ	**2,353.97**	2,262.32	2,879.76	Fuel*
Total	**GJ**	**7,268.17**	**7,037.15**	**7,322.31**	**Total**
Intensitas Penggunaan Energi	**GJ/Juta Rp** **GJ/Million Rp**	**0.00350**	**0.00383**	**0.00448**	**Intensity of Energy Use**
Capaian Efisiensi Energi	**GJ/Juta Rp** **GJ/Million Rp**	**0.00233**	**0.00064**	**0.00031**	**Achievement of Energy Efficiency**

* Bahan bakar yang digunakan untuk kendaraan merupakan jenis *Pertalite.* / The fuel used for vehicles is the Pertalite type.

Adapun uraian mengenai konsumsi energi listrik dari operasional Bank berdasarkan jenisnya dipisahkan sebagai berikut:

The description of electrical energy consumption from the Bank's operations based on its type is separated as follows:

Uraian	Satuan Unit	2024	Description
Energi yang Dikonsumsi secara Langsung	kWh	**1,365,056.83**	Directly Consumed Energy
Energi yang Dikonsumsi secara Tidak Langsung	kWh	**-**	Indirectly Consumed Energy
Total Konsumsi Energi Listrik	**kWh**	**1,365,056.83**	**Total Electrical Energy Consumption**

Konsumsi energi merupakan salah satu kontributor terbesar bagi emisi GRK yang akan berdampak terhadap perubahan iklim. Oleh karena itu, Bank berupaya untuk melakukan penghematan energi di berbagai sektor. Langkah ini tidak hanya turut

Energy consumption is one of the largest contributors to GHG emissions that will impact climate change. Therefore, the Bank strives to save energy in various sectors. This step not only contributes to handling climate change, but can also be

berkontribusi bagi penanganan perubahan iklim, namun juga dapat mengefisienkan biaya. Upaya-upaya efisiensi energi yang telah direalisasikan Bank diuraikan sebagai berikut:

1. Mematikan perangkat elektronik, lampu, dan AC ketika tidak digunakan untuk menghemat energi;
2. Mengganti lampu biasa dengan lampu LED yang lebih efisien dan hemat energi; dan
3. Mengurangi pertemuan tatap muka dan beralih ke rapat daring untuk mengurangi penggunaan bahan bakar kendaraan.

Efisiensi Penggunaan Air [POJK F.8] [E-04]

Air merupakan salah satu sumber daya yang diperlukan untuk keperluan operasional sehari-hari. Adapun sumber konsumsi air Bank berasal dari Perusahaan Daerah Air Minum (PDAM), baik untuk kebutuhan sanitasi maupun kebutuhan rumah tangga kantor. Dalam pemanfaatannya, Bank senantiasa mendorong setiap insan Bank untuk berkomitmen menggunakan air secara efisien dengan melakukan beberapa inisiatif berikut:

1. Memasang sensor otomatis pada keran untuk memastikan penggunaan air yang lebih efisien;
2. Meningkatkan kesadaran karyawan tentang pentingnya penghematan air melalui brosur dan pesan imbauan yang ditempatkan di area-area sumber air, seperti keran; dan
3. Melakukan pemeriksaan rutin terhadap keran, *shower*, toilet, dan meteran air untuk mendeteksi kerusakan sedini mungkin dan mencegah kebocoran yang dapat menyebabkan pemborosan air.

Informasi mengenai penggunaan dan efisiensi air Bank selama 3 (tiga) tahun terakhir ditunjukkan sebagai berikut:

cost-efficient. The energy efficiency efforts realized by the Bank are described as follows:

1. Turn off electronic devices, lights, and air conditioning when not in use to save energy;
2. Replace ordinary lamps with more efficient and energy-saving LED lamps; and
3. Reduce face-to-face meetings and switch to online meetings to reduce the use of fuel for vehicle.

Using Water Efficiently [POJK F.8] [E-04]

Water is one of the resources required for daily operations. The Bank's water consumption comes from the Regional Drinking Water Company (PDAM), both for sanitation needs and office household needs. In its utilization, the Bank always encourages every Bank employee to commit to using water efficiently by carrying out the following initiatives:

1. Installing automatic sensor on faucet to ensure more efficient use of water;
2. Increasing employee awareness of the importance of saving water through brochures and appeals placed in water source areas, such as taps; and
3. Periodically checking on taps, showers, toilets, and water meters to detect damage as early as possible and prevent leaks that can cause water waste.

Information regarding water use and efficiency at the Bank over the past 3 (three) years is shown as follows:

Uraian	Satuan Unit	2024	2023	2022	Description
Air	m^3	**20,080.38**	18,746.74	5,494.06	Water
Intensitas Penggunaan Air Terhadap Pendapatan Operasional	**m^3/Juta Rp** m^3/Million Rp	**0.00967**	**0.01021**	**0.00336**	**Intensity of Water Use to Operating Income**
Capaian Penghematan Air	**m^3/Juta Rp** m^3/Million Rp	**0.00054**	**(0.00685)**	**0.00048**	**Achievement of Water Saving**

Pengelolaan Limbah [POJK F.13] [POJK F.14] [POJK F.15] [E-05]

Kegiatan operasional perbankan menghasilkan berbagai jenis limbah, baik organik maupun anorganik, dengan mayoritas limbah berupa kertas. Namun, hingga saat ini, Bank Victoria masih berfokus pada penghitungan limbah kertas sebagai bagian dari upaya pengelolaan limbah yang lebih terukur. Bank mencatat bahwa limbah kertas yang dihasilkan mencapai 3,34 ton per tahun pada tahun 2024.

Waste Management [POJK F.13] [POJK F.14] [POJK F.15] [E-05]

Banking operational activities generate various types of waste, both organic and inorganic, with the majority of paper waste. However, to date, Bank Victoria still focuses on counting paper waste as part of a more measurable waste management effort. The Bank recorded that the paper waste generated 3.34 tons per year in 2024.

Untuk mengelola limbah ini, Bank Victoria menerapkan metode pengelolaan limbah yang berprinsip pada *reduce, reuse,* dan *recycle* (3R). Strategi ini mencakup upaya mengurangi penggunaan kertas melalui digitalisasi proses kerja, memanfaatkan kembali kertas bekas untuk keperluan internal, serta mendaur ulang limbah kertas melalui kerja sama dengan pihak ketiga, yaitu pengelola gedung.

Meskipun pengelolaan limbah saat ini lebih terfokus pada limbah kertas, Bank Victoria berkomitmen untuk terus mengembangkan sistem pengelolaan limbah yang lebih menyeluruh, termasuk memperluas cakupan penghitungan limbah ke jenis limbah lainnya. Langkah ini dilakukan untuk memastikan seluruh proses operasional dijalankan secara efisien, bertanggung jawab, dan sesuai dengan prinsip keberlanjutan lingkungan.

Tumpahan yang Terjadi

Pada tahun 2024, tidak terdapat kejadian tumpahan limbah yang disebabkan oleh kegiatan operasional Bank.

Keanekaragaman Hayati [POJK F.9] [POJK F.10]

Wilayah operasional Bank tidak berada pada lokasi yang berdekatan atau bersinggungan dengan area yang dilindungi maupun kawasan yang memiliki keanekaragaman hayati tinggi. Dengan demikian, operasional Bank tidak berdampak negatif terhadap keanekaragaman hayati. Meski demikian, sebagai langkah kecil dalam mendukung tersedianya ruang terbuka hijau, Bank bekerja sama dengan pengelola gedung melakukan penempatan pot tanaman di sekitar kantor Bank.

Pengendalian Emisi [POJK F.11] [POJK F.12] [E-01] [E-02]

Penggunaan sumber energi untuk kegiatan operasional menghasilkan emisi sebagai salah satu penyumbang Gas Rumah Kaca (GRK) yang berpotensi memicu pemanasan global dan perubahan iklim. Terkait hal tersebut, Bank melakukan upaya untuk mengurangi emisi yang dihasilkan dengan:

1. Menempatkan tanaman hias di berbagai area kantor untuk meningkatkan kadar oksigen dan mengurangi partikel debu di udara;
2. Mengurangi konsumsi listrik melalui penerapan kebijakan hemat energi; dan
3. Meminimalkan perjalanan dinas dengan mengoptimalkan penggunaan platform pertemuan daring serta meningkatkan efisiensi penggunaan kendaraan, terutama untuk perjalanan luar kota.

Melalui langkah-langkah tersebut, Bank berkomitmen untuk mengurangi dampak lingkungan dan mendukung keberlanjutan.

To manage this waste, Bank Victoria applies a waste management method based on the principles of reduce, reuse, and recycle (3R). This strategy covers efforts to reduce paper use through digitizing work processes, reusing used paper for internal purposes, and recycling paper waste through cooperation with third parties, namely the building managers.

Although the waste management is currently more focused on paper waste, Bank Victoria is committed to continuously developing a more comprehensive waste management system, including expanding the scope of waste accounting to other types of waste. This step is taken to ensure that all operational processes are carried out efficiently, responsibly, and in accordance with the principles of environmental sustainability.

Spills

In 2024, there were no waste spills caused by the Bank's operational activities.

Biodiversity [POJK F.9] [POJK F.10]

The Bank's operational areas are not located near or in contact with protected areas or regions with high biodiversity. Thus, the Bank's operations do not have any negative impact on biodiversity. Nevertheless, as a small step in supporting the availability of green open space, the Bank cooperates with building managers to place plant pots around the Bank's offices.

Emission Control [POJK F.11] [POJK F.12] [E-01] [E-02]

The use of energy sources for operational activities generates emissions, as one contributor to Greenhouse Gas (GHG), which have the potential to trigger global warming and climate change. As such, the Bank makes efforts to reduce the emissions generated by:

1. Placing ornamental plants in various office areas to increase oxygen levels and reduce dust particles in the air;
2. Reducing electricity consumption through the implementation of energy-saving policies; and
3. Minimizing business trip by optimizing the use of online meeting platforms and increasing the efficiency of vehicle use, especially for trip out of town.

Through these steps, the Bank is committed to reducing environmental impacts and supporting sustainability.

Informasi mengenai jumlah emisi yang dihasilkan Bank selama 3 (tiga) tahun terakhir ditunjukkan sebagai berikut:

Information on the amount of emissions generated by the Bank over the past 3 (three) years is shown as follows:

Uraian		2024	2023	2022	Description	
		$TonCO_2eq$				
Lingkup 1	Operasional Utama (Bahan Bakar)	**157.84**	151.70	193.10	Main Operation (Fuel)	Scope 1
Lingkup 2	Listrik yang Dibeli	**1,283.15**	1,246.76	1,160.00	Electricity Purchased	Scope 2
Total Emisi		**1,440.99**	**1,398.46**	**1,353.10**	**Total Emissions**	
Intensitas Emisi ($TonCO_2eq$/Juta Rp)		**0.00069**	**0.00076**	**0.00083**	**Emission Intensity ($TonCO_2eq$/Million Rp)**	
Capaian Efisiensi Emisi ($TonCO_2eq$/Juta Rp)		**0.00007**	**0.00007**	**0.00007**	**Achievement of Emission Efficiency ($TonCO_2eq$/Million Rp)**	

Berikut ini, disajikan tabel mengenai penggunaan energi pada masing-masing lingkup emisi di Bank yang disesuaikan dengan standar ESG IDX.

The following is the table of energy use in each emission scope at the Bank, adjusted to IDX ESG standard.

Uraian	Satuan Unit	2024	Description
Kategori 1: Emisi GRK Langsung dan Pembuangan **Category 1: Direct GHG Emissions and Removals**			
Emisi Langsung dari Pembakaran Stasioner	Ton CO_2eq	-	Direct Emissions from Stationary Combustion
Emisi Langsung dari Pembakaran Bergerak	Ton CO_2eq	**157.84**	Direct Emissions from Mobile Combustion
Emisi Langsung dari Proses Pengolahan	Ton CO_2eq	-	Direct Emissions from Processes
Emisi *Fugitive* Langsung	Ton CO_2eq	-	Direct Fugitive Emissions
Emisi Langsung dari *Land Use, Land Use Change and Forestry* (LULUCF)	Ton CO_2eq	-	Direct Emissions from Land Use, Land Use Change, and Forestry (LULUCF)
Total Emisi Langsung (*Scope* 1)	**Ton CO_2eq**	**157.84**	**Total Direct Emissions (Scope 1)**
Kategori 2: Emisi GRK Tidak Langsung dari Energi yang Diimpor/Dibeli **Category 2: Indirect GHG Emissions from Imported/Purchased Energy**			
Emisi Tidak Langsung dari Konsumsi Listrik yang Diimpor/Dibeli	Ton CO_2eq	**1,283.15**	Indirect Emissions from Imported/Purchased Electricity Consumption
Emisi Tidak Langsung dari Konsumsi Jaringan Energi yang Diimpor/Dibeli (Diluar Listrik)	Ton CO_2eq	-	Indirect Emissions from Imported/Purchased Network Energy Consumption (Excluding Electricity)
Total Emisi Tidak Langsung (*Scope* 2)	**Ton CO_2eq**	**1,283.15**	**Total Indirect Emissions (Scope 2)**
Kategori 3: Emisi GRK Tidak Langsung dari Transportasi **Category 3: Indirect GHG Emissions from Transportation**			
Transportasi dan Distribusi Hulu	Ton CO_2eq	-	Upstream Transportation and Distribution
Perjalanan Dinas	Ton CO_2eq	-	Business Trip
Transportasi dari Klien dan Pengunjung	Ton CO_2eq	-	Transportation of Clients and Visitors
Transportasi dan Distribusi Hilir	Ton CO_2eq	-	Downstream Transportation and Distribution
Perjalanan Karyawan	Ton CO_2eq	-	Employee Commuting
Kategori 4: Emisi GRK Tidak Langsung dari Produk yang Digunakan Perusahaan **Category 4: Indirect GHG Emissions from Products Used by Company**			
Kegiatan yang Berhubungan dengan Energi yang Tidak Termasuk dalam Emisi Langsung dan Emisi Energi Tidak Langsung	Ton CO_2eq	-	Energy-Related Activities Not Included in Direct Emissions and Indirect Energy Emissions
Pembelian Barang dan Jasa	Ton CO_2eq	-	Purchased Goods and Services
Capital Equipment/Goods	Ton CO_2eq	-	Capital Equipment/Goods
Limbah yang Dihasilkan dalam Kegiatan Operasional	Ton CO_2eq	-	Waste Generated in Operations
Aset Sewaan Hulu	Ton CO_2eq	-	Upstream Leased Assets

Uraian	Satuan Unit	2024	Description
Kategori 5: Emisi GRK Tidak Langsung yang Terkait Dengan Penggunaan Produk dari Perusahaan **Category 5: Indirect GHG Emissions Associated with the Use of the Company's Products**			
Investasi	Ton CO_2eq	-	Investments
Penggunaan Produk yang Dijual	Ton CO_2eq	-	Use of Products Sold
Pembuangan Akhir Masa Pakai Produk yang Dijual	Ton CO_2eq	-	End-of-Life Removals of Products Sold
Waralaba Hilir	Ton CO_2eq	-	Downstream Franchises
Aset Sewaan Hilir	Ton CO_2eq	-	Downstream Leased Assets
Pengolahan Produk yang Dijual	Ton CO_2eq	-	Processing of Products Sold
Kategori 6: Emisi GRK Tidak Langsung dari Sumber Lainnya **Category 6: Indirect GHG Emissions from Other Sources**			
Emisi atau Pembuangan Tidak Langsung Lainnya	Ton CO_2eq	-	Other Indirect Emissions or Removals
Total Emisi Tidak Langsung (*Scope* 3)	**Ton CO_2eq**	-	**Total Indirect Emissions (Scope 3)**
Total Emisi GRK (*Scope* 1 dan 2)	**Ton CO_2eq**	**1,440.99**	**Total GHG Emissions (Scope 1 and 2)**
Total Emisi GRK (*Scope* 1, 2, dan 3)	**Ton CO_2eq**	-	**Total GHG Emissions (Scope 1, 2, and 3)**
Offsets/Credits	**Ton CO_2eq**	-	**Offsets/Credits**
Pembelian *Renewable Energy Certificate* (REC)	**kWh**	-	**Purchase of Renewable Energy Certificate (REC)**
Intensitas Emisi GRK (*Scope* 1 dan 2)	**Ton CO_2eq/Juta Rp** Ton CO_2eq/Million Rp	**0.00069**	**GHG Emissions Intensity (Scope 1 and 2)**

Komitmen untuk Mengurangi Emisi Gas Rumah Kaca [E-06] [E-07]

Bank Victoria berkomitmen untuk mendukung upaya global dalam pengendalian perubahan iklim melalui pengurangan emisi GRK. Pengurangan emisi GRK diharapkan dapat dicapai Bank di tahun 2025.

Sebagai bentuk keseriusan dalam mencapai target tersebut, Bank Victoria telah membentuk sistem manajemen yang khusus mengawasi pengendalian iklim yang dikoordinir oleh *Change Management Office Division* dan dibantu oleh divisi dan/atau unit kerja lainnya. Unit ini bertanggung jawab untuk merancang, melaksanakan, dan memantau inisiatif strategis terkait pengurangan emisi GRK. Langkah-langkah konkret yang telah dilakukan Bank Victoria meliputi:

1. Mengimplementasi teknologi hemat energi di kantor-kantor operasional;
2. Mengoptimalisasi pengelolaan limbah operasional untuk mengurangi dampak lingkungan; dan
3. Mengurangi emisi dari aktivitas operasional melalui digitalisasi proses dan pengurangan perjalanan dinas.

Bank Victoria percaya bahwa kontribusi aktif dalam pengurangan emisi GRK tidak hanya mendukung keberlanjutan lingkungan, tetapi juga menciptakan nilai tambah bagi pemangku kepentingan dan masyarakat secara keseluruhan. Komitmen ini akan terus dijalankan untuk mencapai masa depan yang lebih hijau dan berkelanjutan.

Commitment to Reduce Greenhouse Gas Emissions [E-06] [E-07]

Bank Victoria is committed to supporting global efforts to control climate change by reducing GHG emissions. The Bank is expected to achieve reductions in GHG emission in 2025.

As a form of determination in achieving this target, Bank Victoria establishes the management system that specifically oversees climate control, coordinated by the Change Management Office Division and assisted by other divisions and/or work units. This team is responsible for designing, implementing, and monitoring strategic initiatives related to reducing GHG emissions. Concrete measures taken by Bank Victoria include:

1. Implementing energy-efficient technology in operational offices;
2. Optimizing operational waste management to reduce environmental impact; and
3. Reducing emissions from operational activities through process digitizing and reducing business trip.

Bank Victoria believes that active contributions to reducing GHG emissions not only support environmental sustainability, but also create added value for stakeholders and community as a whole. This commitment will continue to be carried out to achieve a greener and more sustainable future.

Sarana Pengaduan Terkait Masalah Lingkungan [POJK F.16]

Hingga saat ini, Bank belum memiliki mekanisme pengaduan masalah lingkungan hidup, mengingat kegiatan usaha yang dijalankan Bank saat ini tidak memiliki dampak langsung pada keberlangsungan lingkungan hidup. Meski demikian, pemangku kepentingan dapat menyampaikan pengaduan apabila kegiatan Bank mengganggu lingkungan hidup melalui *email, call center*, situs web Bank, ataupun media sosial Bank. Sepanjang 3 (tiga) tahun terakhir, Bank tidak menerima laporan terkait masalah lingkungan hidup.

Biaya Lingkungan Hidup [POJK F.4]

Bank belum memiliki alokasi biaya khusus untuk pengelolaan lingkungan. Biaya tersebut telah termasuk ke dalam biaya operasional kantor.

Complaint Channel Related to Environmental Issue [POJK F.16]

Until now, the Bank does not have a complaint channel for environmental issues, considering that the business activities carried out by the Bank do not have a direct impact on environmental sustainability. Nevertheless, stakeholders can submit complaints through email, call center, Bank website, or Bank social media, in the event that the Bank's activities disrupt the environment. Over the past 3 (three) years, the Bank did not receive any reports related to environmental issues.

Environmental Costs [POJK F.4]

The Bank has no specific cost allocation for environmental management. These costs are included in the office operational costs.

Indeks Pengungkapan Kriteria POJK No. 51/POJK.03/2017 [POJK G.4]

POJK Criteria Disclosure Index No. 51/POJK.03/2017

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Tanggapan Terhadap Umpan Balik Laporan Tahun Sebelumnya [POJK G.3]

Responses to Previous Year's Report Feedback

Bank tidak mendapat tanggapan dari para pemangku kepentingan setelah diterbitkannya Laporan Tahunan dan Keberlanjutan 2023. Dengan demikian, dalam Laporan ini tidak terdapat informasi secara spesifik tentang tindak lanjut yang diambil Bank atas tanggapan dari pemangku kepentingan tahun sebelumnya.

The Bank did not receive any responses from stakeholders subsequent to the publication of the 2023 Annual and Sustainability Report. Therefore, this Report contains no specific information on the follow-up actions taken by the Bank on the responses from stakeholders in the previous year.

Verifikasi Tertulis dari Pihak Independen [POJK.G.1]

Written Verification from Independent Party

Bank memastikan bahwa seluruh isi dan data yang disampaikan telah melalui tahap verifikasi internal walaupun Bank tidak menggunakan jasa penjamin (*assurance*).

The Bank ensures that all contents and data submitted have undergone internal verification phase even though the Bank does not use assurance services.

Lembar Umpan Balik [POJK G.2]

Feedback Form

Setelah membaca Laporan Keberlanjutan PT Bank Victoria International Tbk, kami mohon kesediaan para pemangku kepentingan untuk memberikan umpan balik dengan mengirim *e-mail* atau mengirim formulir ini melalui fax/pos.

After reading this Sustainability Report of PT Bank Victoria International Tbk, we would like to ask all stakeholders to kindly provide feedback by sending e-mail or sending this form by fax/mail.

Pertanyaan Questions	Setuju Agree	Tidak Setuju Disagree
Laporan ini telah memberikan informasi yang bermanfaat mengenai kinerja ekonomi, sosial, dan lingkungan perusahaan. This report has provided useful information on economic, social, and environmental performance of the company.		
Data dan informasi yang diungkapkan mudah dipahami, lengkap, transparan, dan berimbang. Data and information disclosed are easy to understand, complete, transparent, and balanced.		
Data dan informasi yang disajikan berguna dalam pengambilan keputusan. Data and information presented are useful for making decision.		
Laporan ini menarik dan mudah dibaca. This report is interesting and easy to read.		

Mohon berikan nilai mengenai aspek yang terdapat dalam laporan ini (nilai 1 = paling penting, 2 = penting, 3 = tidak penting, 4 = sangat tidak penting).

Please score on aspects presented in this report (1 = most important, 2 = important, 3 = less important, 4 = least important).

- Kinerja Ekonomi
  Economic Performance
- Pinjaman UMKM
  MSME Loans
- Pemberian Kredit dengan Pertimbangan Aspek Lingkungan
  Providing Loans with the Consideration of Environmental Aspects
- Kesetaraan Gender dan Kesempatan Kerja yang Adil
  Gender Equality and Fair Job Opportunity
- Pelatihan dan Pendidikan
  Training and Education
- Kesehatan dan Keselamatan Kerja
  Occupational Health and Safety
- *Anti-Fraud*
  Anti-Fraud
- Privasi Nasabah
  Customer Privacy
- Penggunaan Energi
  Energy Consumption
- Penggunaan Air
  Water Consumption
- Pengelolaan Limbah
  Waste Treatment
- Pengembangan Masyarakat
  Community Development

Mohon berikan komentar/saran/usulan bagi laporan ini.

Please provide your comments/suggestions/ideas for this report.

.....

.....

.....

.....

Profil Anda / Your Profile

Nama / Name : .....

Pekerjaan / Occupation : .....

Institusi/Perusahaan / Institution/Company : .....

Kontak (telepon, *e-mail*) Contact (telephone, e-mail) : .....

Kategori Pemangku Kepentingan / Category of Stakeholder

- Pemerintah / Government
- Mitra Usaha / Business Partners
- LSM / NGO
- Nasabah / Customer
- *Media*
- Lain-Lain, ... / Others, ...
- Karyawan / Employees
- Masyarakat / Community

Saran dan tanggapan yang Anda berikan atas informasi yang disajikan dalam laporan ini mohon dikirimkan kepada:

Please send your suggestion and response to the information presented in this report to:

Kantor Pusat Bank Victoria
Head Office of Bank Victoria

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Kriteria Penyampaian Laporan Tahunan Berdasarkan SEOJK No. 16/SEOJK.04/2021

Criteria for Annual Report Submission based on SEOJK No. 16/SEOJK.04/2021

Kriteria Criteria	Penjelasan Explanation	Halaman Page
Ketentuan Umum **General Provisions**		
Laporan Tahunan disajikan dalam bentuk dokumen cetak dan dokumen elektronik. The Annual Report is presented in the form of printed documents and electronic documents.		√
Laporan Tahunan yang disajikan dalam bentuk dokumen cetak, dicetak pada kertas yang berwarna terang, berkualitas baik, berukuran A4, dijilid, dan dapat diperbanyak dengan kualitas yang baik. The Annual Report is presented in hardcopy format, printed on bright colored paper, of good quality, A4 size, bound, and can be reproduced in good quality.		√
Laporan Tahunan dapat menyajikan informasi berupa gambar, grafik, tabel, dan/atau diagram dengan mencantumkan judul dan/atau keterangan yang jelas, sehingga mudah dibaca dan dipahami. The Annual Report can present information in the form of pictures, graphs, tables and/or diagrams by including clear titles and/or descriptions, so that they are easy to read and understand.		√
Laporan Tahunan yang disajikan dalam bentuk dokumen elektronik merupakan Laporan Tahunan yang dikonversi dalam *portable document format* (PDF). The Annual Report presented in the form of an electronic document is an Annual Report that is converted in portable document format (PDF).		√
Isi Laporan Tahunan **Annual Report Contents**		
Kilas Kinerja **Performance Highlights**		
Ikhtisar data keuangan penting memuat informasi keuangan yang disajikan dalam bentuk perbandingan selama 3 (tiga) tahun buku atau sejak memulai usahanya jika Emiten atau Perusahaan Publik tersebut menjalankan kegiatan usahanya kurang dari 3 (tiga) tahun. Summary of important financial data contains financial information presented in comparative form for 3 (three) financial years or since the business starts if the Issuer or Public Company started its business in less than 3 (three) years ago.	Informasi memuat antara lain: 1. Pendapatan/penjualan; 2. Laba bruto; 3. Laba (rugi); 4. Jumlah laba (rugi) yang dapat diatribusikan kepada pemilik entitas induk dan kepentingan non pengendali; 5. Total laba (rugi) komprehensif; 6. Jumlah laba (rugi) komprehensif yang dapat diatribusikan kepada pemilik entitas induk dan kepentingan non-pengendali; 7. Laba (rugi) per saham; 8. Jumlah aset; 9. Jumlah liabilitas; 10. Jumlah ekuitas; 11. Rasio laba (rugi) terhadap jumlah aset; 12. Rasio laba (rugi) terhadap ekuitas; 13. Rasio laba (rugi) terhadap pendapatan; 14. Rasio lancar; 15. Rasio liabilitas terhadap ekuitas; 16. Rasio liabilitas terhadap jumlah aset; dan 17. Informasi dan rasio keuangan lainnya yang relevan dengan perusahaan dan jenis industrinya. Information includes, among others: 1. Revenue/sales; 2. Gross profit; 3. Profit (loss); 4. Total profit (loss) attributable to owners of the parent entity and non-controlling interests; 5. Total comprehensive profit (loss); 6. Total comprehensive profit (loss) attributable to owners of the parent entity and non-controlling interests; 7. Earnings (loss) per share; 8. Total assets; 9. Total liabilities; 10. Total equity; 11. Profit (loss) to total assets ratio; 12. Profit (loss) to equity ratio; 13. Profit (loss) to revenue ratio; 14. Current ratio; 15. Liabilities to equity ratio; 16. Liabilities to total assets ratio; and 17. Information and other financial ratios that are relevant to the company and the type of industry.	**16**

Kriteria Criteria	Penjelasan Explanation	Halaman Page
Informasi Saham	Informasi saham bagi Perusahaan Terbuka paling sedikit memuat: 1. Saham yang telah diterbitkan untuk setiap masa triwulan yang disajikan dalam bentuk perbandingan selama 2 (dua) tahun buku terakhir, paling sedikit memuat: a. Jumlah saham yang beredar; b. Kapitalisasi pasar berdasarkan harga pada bursa efek tempat saham dicatatkan; c. Harga saham tertinggi, terendah, dan penutupan berdasarkan harga pada bursa efek tempat saham dicatatkan; dan d. Volume perdagangan pada bursa efek tempat saham dicatatkan. Informasi dalam huruf b), huruf c) dan huruf d) hanya diungkapkan jika sahamnya tercatat di bursa efek; 2. Dalam hal terjadi aksi korporasi yang menyebabkan terjadinya perubahan pada saham, seperti pemecahan saham (*stock split*), penggabungan saham (*reverse stock*), dividen saham, saham bonus, perubahan nilai nominal saham, penerbitan efek konversi, serta penambahan dan pengurangan modal, informasi saham sebagaimana dimaksud pada angka 1) ditambahkan penjelasan paling sedikit mengenai: a. Tanggal pelaksanaan aksi korporasi; b. Rasio pemecahan saham (*stock split*), penggabungan saham (*reverse stock*), dividen saham, saham bonus, jumlah efek konversi yang diterbitkan, dan perubahan nilai nominal saham; c. Jumlah saham beredar sebelum dan sesudah aksi korporasi; d. Jumlah efek konversi yang dilaksanakan (jika ada); dan e. Harga saham sebelum dan sesudah aksi korporasi; 3. Dalam hal terjadi penghentian sementara perdagangan saham (*suspension*) dan/atau pembatalan pencatatan saham (*delisting*) dalam tahun buku, dijelaskan alas an penghentian sementara perdagangan saham (*suspension*) dan/atau pembatalan pencatatan saham (*delisting*) tersebut; dan 4. Dalam hal penghentian sementara perdagangan saham (*suspension*) sebagaimana dimaksud pada angka 3) dan/atau proses pembatalan pencatatan saham (*delisting*) masih berlangsung hingga akhir periode laporan tahunan, dijelaskan tindakan yang dilakukan untuk menyelesaikan penghentian sementara perdagangan saham (*suspension*) dan/atau pembatalan pencatatan saham (*delisting*) tersebut.	**20**
Share Information	Information on shares for Public Companies at least contains: 1. Shares that have been issued for each quarter, presented in comparative form for the last 2 (two) financial years, at least contain: a. Number of outstanding shares; b. Market capitalization based on the price on the stock exchange where the shares are listed; c. The highest, lowest, and closing share prices based on the price on the stock exchange where the shares are listed; and d. Trading volume on the stock exchange where the shares are listed. Information in letter b), letter c) and letter d) is only disclosed if the shares are listed on the stock exchange; 2. In the event of a corporate action causing a change in shares, such as stock split, reverse stock, share dividends, bonus shares, changes in the nominal value of shares, issuance of convertible securities, as well as capital increase and decrease, share information as referred to in number 1) shall be added with an explanation of at least: a. The corporate action execution date; b. Ratio of stock split, reverse stock, stock dividends, bonus shares, number of convertible securities issued, and changes in share par value; c. The number of outstanding shares before and after the corporate action; d. The number of convertible securities executed (if any); and e. Share prices before and after corporate actions; 3. In the event of temporary suspension of share trading and/or delisting of share in the financial year, the reasons for the temporary suspension of share trading and/or delisting of share must be explained; and 4. In the event of temporary suspension of share trading as referred to in number 3) and/or the process of delisting of shares is still ongoing at the end of the annual report period, the actions taken to resolve the temporary suspension of share trading and/or delisting of share must be explained.	

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Laporan Direksi dan Dewan Komisaris **Report of the Board of Directors and Board of Commissioners**		
Laporan Direksi Board of Directors' Report	Laporan Direksi paling sedikit memuat uraian singkat mengenai: 1. Kinerja Emiten atau Perusahaan Publik, paling sedikit memuat: a. Strategi dan kebijakan strategis Emiten atau Perusahaan Publik; b. Peranan Direksi dalam perumusan strategi dan kebijakan strategis Emiten atau Perusahaan Publik; c. Proses yang dilakukan Direksi untuk memastikan implementasi strategi Emiten atau Perusahaan Publik; d. Perbandingan antara hasil yang dicapai dengan yang ditargetkan Emiten atau Perusahaan Publik; dan e. Kendala yang dihadapi Emiten atau Perusahaan Publik; 2. Gambaran tentang prospek usaha Emiten atau Perusahaan Publik; dan 3. Penerapan tata kelola Emiten atau Perusahaan Publik. The Board of Directors' report contains at least a brief description of: 1. Performance of Issuers or Public Companies, at least includes: a. Issuer's or Public Company's strategy and strategic policies; b. The role of the Board of Directors in formulating the strategy and strategic policies of the Issuer or Public Company; c. The process carried out by the Board of Directors to ensure the implementation of the Issuer's or Public Company's strategy; d. Comparison between the results achieved and those targeted by the Issuer or Public Company; and e. Obstacles faced by Issuers or Public Companies; 2. An overview of the business prospects of the Issuer or Public Company; and 3. Implementation of Issuer or Public Company governance.	**33**
Laporan Dewan Komisaris Board of Commissioners' Report	Laporan Dewan Komisaris paling sedikit memuat uraian singkat mengenai: 1. Penilaian terhadap kinerja Direksi mengenai pengelolaan Emiten atau Perusahaan Publik, termasuk pengawasan Dewan Komisaris dalam perumusan dan implementasi strategi Emiten atau Perusahaan Publik yang dilakukan oleh Direksi; 2. Pandangan atas prospek usaha Emiten atau Perusahaan Publik yang disusun oleh Direksi; dan 3. Pandangan atas penerapan tata kelola Emiten atau Perusahaan Publik. The Board of Commissioners' report contains at least a brief description of: 1. Assessment of the Board of Directors' performance regarding the management of the Issuer or Public Company, including the Board of Commissioners' oversight in the formulation and implementation of the Issuer's or Public Company's strategy carried out by the Board of Directors; 2. Views on the business prospects of the Issuer or Public Company prepared by the Board of Directors; and 3. Views on the implementation of governance of the Issuer or Public Company.	**41**
Profil Perusahaan **Company Profile**		
1. Nama Emiten atau Perusahaan Publik termasuk apabila terdapat perubahan nama, alasan perubahan, dan tanggal efektif perubahan nama pada tahun buku. Name of Issuer or Public Company including if there is a name change, reasons for the change, and the effective date of the name change in the financial year.		**54**
2. Akses terhadap Emiten atau Perusahaan Publik termasuk kantor cabang atau kantor perwakilan yang memungkinkan masyarakat dapat memperoleh informasi mengenai Emiten atau Perusahaan Publik. Access to Issuers or Public Companies including branch offices or representative offices that enable the public to obtain information about Issuers or Public Companies.	a. Alamat; b. Nomor telepon; c. Alamat surat elektronik; dan d. Alamat situs web. a. Address; b. Phone number; c. Electronic mail address; and d. Website address.	**54**
3. Riwayat singkat Emiten atau Perusahaan Publik. Brief history of Issuer or Public Company.		**56**
4. Visi dan misi Emiten atau Perusahaan Publik serta budaya perusahaan (*corporate culture*) atau nilai-nilai perusahaan. Issuer's or Public Company's vision and mission and corporate culture or corporate values.		**58**

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5. Kegiatan usaha menurut anggaran dasar terakhir, kegiatan usaha yang dijalankan pada tahun buku, serta jenis barang dan/atau jasa yang dihasilkan. Business activities according to the latest articles of association, business activities carried out in the financial year, and types of goods and/or services produced.		60
6. Wilayah operasional Emiten atau Perusahaan Publik; wilayah operasional merupakan wilayah atau daerah pelaksanaan kegiatan operasional atau jangkauan dari kegiatan operasional perusahaan. The operational area of the Issuer or Public Company; operational area is the area or region where the operational activities take place or the coverage area of the company's operational activities.		62
7. Struktur organisasi Emiten atau Perusahaan Publik dalam bentuk bagan, paling sedikit sampai dengan struktur 1 (satu) tingkat di bawah Direksi termasuk komite di bawah Direksi (jika ada) dan komite di bawah Dewan Komisaris, disertai dengan nama dan jabatan. The organizational structure of the Issuer or Public Company in the form of a chart, at least up to 1 (one) level below the Board of Directors including committees under the Board of Directors (if any) and committees under the Board of Commissioners, accompanied by names and positions.		66
8. Daftar keanggotaan asosiasi industri baik dalam skala nasional maupun internasional yang berkaitan dengan penerapan keuangan berkelanjutan. List of industry association memberships both on a national and international scale related to the implementation of sustainable finance.		68
9. Profil Direksi.	a. Nama dan jabatan yang sesuai dengan tugas dan tanggung jawab; b. Foto terbaru; c. Usia; d. Kewarganegaraan; e. Riwayat pendidikan dan/atau sertifikasi; f. Riwayat jabatan, meliputi informasi: 1) Dasar hukum pengangkatan sebagai anggota Direksi pada Emiten atau Perusahaan Publik yang bersangkutan; 2) Rangkap jabatan, baik sebagai anggota Direksi, anggota Dewan Komisaris, dan/atau anggota komite serta jabatan lainnya baik di dalam maupun di luar Emiten atau Perusahaan Publik. Dalam hal anggota Direksi tidak memiliki rangkap jabatan, maka diungkapkan mengenai hal tersebut; dan 3) Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar Emiten atau Perusahaan Publik; g. Hubungan afiliasi dengan anggota Direksi lainnya, anggota Dewan Komisaris, pemegang saham utama, dan pengendali baik langsung maupun tidak langsung sampai kepada pemilik individu, meliputi nama pihak yang terafiliasi. Dalam hal anggota Direksi tidak memiliki hubungan afiliasi, maka Emiten atau Perusahaan Publik mengungkapkan hal tersebut; dan h. Perubahan komposisi anggota Direksi dan alasan perubahannya. Dalam hal tidak terdapat perubahan komposisi anggota Direksi, maka diungkapkan mengenai hal tersebut.	72

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Board of Directors' Profile.	a. Name and position according to duties and responsibilities; b. Latest photos; c. Age; d. Citizenship; e. Educational history and/or certification; f. Position history, including information on: 1) The legal basis of appointment as a member of the Board of Directors of the Issuer or Public Company concerned; 2) Concurrent positions, as members of the Board of Directors, members of the Board of Commissioners, and/or committee members as well as other positions inside and outside the Issuer or Public Company. In the event that members of the Board of Directors do not have concurrent positions, then this shall be disclosed; and 3) Work experience and time period inside and outside the Issuer or Public Company; g. Affiliation with other members of the Board of Directors, members of the Board of Commissioners, major and controlling shareholders, either directly or indirectly up to individual owners, including names of affiliated parties. In the event that members of the Board of Directors have no affiliation, then the Issuer or Public Company shall disclose this matter; and h. Changes in the composition of members of the Board of Directors and reasons for the changes. In the event that there is no change in the composition of the members of the Board of Directors, this shall be disclosed.	
10. Profil Dewan Komisaris.	a. Nama dan jabatan; b. Foto terbaru; c. Usia; d. Kewarganegaraan; e. Riwayat pendidikan dan/atau sertifikasi; f. Riwayat jabatan, meliputi informasi: 1) Dasar hukum pengangkatan sebagai anggota dewan komisaris; 2) Dasar hukum pengangkatan pertama kali sebagai anggota dewan komisaris yang merupakan komisaris independen pada emiten atau perusahaan publik yang bersangkutan; 3) Rangkap jabatan, baik sebagai anggota dewan komisaris, anggota direksi, dan/atau anggota komite serta jabatan lainnya baik di dalam maupun di luar emiten atau perusahaan Publik. Dalam hal anggota Dewan Komisaris tidak memiliki rangkap jabatan, maka diungkapkan mengenai hal tersebut; dan 4) Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar Emiten atau Perusahaan Publik; g. Hubungan afiliasi dengan anggota Dewan Komisaris lainnya, pemegang saham utama, dan pengendali baik langsung maupun tidak langsung sampai kepada pemilik individu, meliputi nama pihak yang terafiliasi; Dalam hal anggota Dewan Komisaris tidak memiliki hubungan afiliasi, maka Emiten atau Perusahaan Publik mengungkapkan hal tersebut; h. Pernyataan independensi komisaris independent dalam hal komisaris independen telah menjabat lebih dari 2 (dua) periode; dan i. Perubahan komposisi anggota Dewan Komisaris dan alasan perubahannya. Dalam hal tidak terdapat perubahan komposisi anggota Dewan Komisaris, maka diungkapkan mengenai hal tersebut.	**69**
Board of Commissioners' Profile.	a. Name and position; b. Latest photos; c. Age; d. Citizenship; e. Educational history and/or certification; f. Position history, including information on: 1) Legal basis of appointment as a member of the board of commissioners; 2) The legal basis for the first appointment as a member of the board of commissioners who is an independent commissioner at the issuer or public company concerned; 3) Concurrent positions, as members of the board of commissioners, members of the board of directors, and/or committee members as well as other positions inside and outside the issuer or public company. In the event that members of the Board of Commissioners do not have concurrent positions, then this shall be disclosed; and 4) Work experience and time period inside and outside the Issuer or Public Company;	

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	g. Affiliation with other members of the Board of Commissioners, major and controlling shareholders, either directly or indirectly up to individual owners, including names of affiliated parties; In the event that members of the Board of Commissioners have no affiliation, the Issuer or Public Company shall disclose this matter; h. Statement of independency of the independent commissioner in the event that the independent commissioner has served more than 2 (two) periods; and i. Changes in the composition of members of the Board of Commissioners and reasons for changes. In the event that there is no change in the composition of the members of the Board of Commissioners, this shall be disclosed.	
11. Dalam hal terdapat perubahan susunan anggota Direksi dan/atau anggota Dewan Komisaris yang terjadi setelah tahun buku berakhir sampai dengan batas waktu penyampaian Laporan Tahunan, susunan yang dicantumkan dalam Laporan Tahunan adalah susunan anggota Direksi dan/atau anggota Dewan Komisaris yang terakhir dan sebelumnya. In the event that there is a change in the composition of members of the Board of Directors and/or members of the Board of Commissioners that occurs after the end of the financial year until the deadline for submitting the Annual Report, the composition included in the Annual Report is the last and previous composition of members of the Board of Directors and/or members of the Board of Commissioners.		**76**
12. Jumlah karyawan menurut jenis kelamin, jabatan, usia, tingkat pendidikan, dan status ketenagakerjaan (tetap/kontrak) dalam tahun buku. Number of employees by gender, position, age, educational level, and employment status (permanent/contract) in the financial year.	Pengungkapan informasi dapat disajikan dalam bentuk tabel. Disclosure of information can be presented in tabular form.	**417**
13. Nama pemegang saham dan persentase kepemilikan pada awal dan akhir tahun buku. Name of shareholder and ownership percentage at the beginning and end of the financial year.	a. Pemegang saham yang memiliki 5% (lima persen) atau lebih saham Emiten atau Perusahaan Publik; b. Anggota Direksi dan anggota Dewan Komisaris yang memiliki saham Emiten atau Perusahaan Publik. Dalam hal seluruh anggota Direksi dan/atau seluruh anggota Dewan Komisaris tidak memiliki saham, maka diungkapkan mengenai hal tersebut; dan c. Kelompok pemegang saham masyarakat, yaitu kelompok pemegang saham yang masing-masing memiliki kurang dari 5% (lima persen) saham Emiten atau Perusahaan Publik. Informasi di atas dapat disajikan dalam bentuk tabel. a. Shareholders who own 5% (five percent) or more shares of the Issuer or Public Company; b. Members of the Board of Directors and members of the Board of Commissioners who own shares of Issuers or Public Companies. In the event that all members of the Board of Directors and/or all members of the Board of Commissioners do not own shares, this shall be disclosed; and c. Group of public shareholders, namely groups of shareholders who each own less than 5% (five percent) of the shares of the Issuer or Public Company. The above information can be presented in tabular form.	**92**
14. Persentase kepemilikan tidak langsung atas saham Emiten atau Perusahaan Publik oleh anggota Direksi dan anggota Dewan Komisaris pada awal dan akhir tahun buku, termasuk informasi mengenai pemegang saham yang terdaftar dalam daftar pemegang saham untuk kepentingan kepemilikan tidak langsung anggota Direksi dan anggota Dewan Komisaris. Percentage of indirect ownership of Issuer or Public Company shares by members of the Board of Directors and members of the Board of Commissioners at the beginning and end of the financial year, including information regarding shareholders who are registered in the shareholders register for the benefit of indirect ownership by members of the Board of Directors and members of the Board of Commissioners.	Dalam hal seluruh anggota Direksi dan/atau seluruh anggota Dewan Komisaris tidak memiliki kepemilikan tidak langsung atas saham Emiten atau Perusahaan Publik, maka diungkapkan mengenai hal tersebut. In the event that all members of the Board of Directors and/or all members of the Board of Commissioners do not have indirect ownership of shares of Issuer or Public Company, then this matter shall be disclosed.	**93**
15. Jumlah pemegang saham dan persentase kepemilikan per akhir tahun buku berdasarkan klasifikasi: Number of shareholders and ownership percentage at the end of the financial year based on classification:	a. Kepemilikan institusi lokal; b. Kepemilikan institusi asing; c. Kepemilikan individu lokal; dan d. Kepemilikan individu asing; a. Ownership of local institutions; b. Ownership of foreign institutions; c. Ownership of local individuals; and d. Ownership of foreign individuals;	**94**

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16. Informasi mengenai pemegang saham utama dan pengendali Emiten atau Perusahaan Publik, baik langsung maupun tidak langsung, sampai kepada pemilik individu, yang disajikan dalam bentuk skema atau bagan. Information regarding major and controlling shareholders of Issuers or Public Companies, either directly or indirectly, up to individual owners, presented in the form of a schematic or chart.		**95**
17. Nama entitas anak, perusahaan asosiasi, perusahaan ventura bersama dimana Emiten atau Perusahaan Publik memiliki pengendalian bersama entitas (jika ada), beserta persentase kepemilikan saham, bidang usaha, total aset, dan status operasi entitas anak, perusahaan asosiasi, perusahaan ventura bersama. Names of subsidiaries, associated companies, joint venture companies where the Issuer or Public Company has joint control of an entity (if any), along with share ownership percentage, line of business, total assets, and operating status of subsidiaries, associated companies, joint venture companies.	Untuk entitas anak, ditambahkan informasi mengenai alamat entitas anak tersebut. For subsidiaries, information regarding the address of subsidiary is added.	**96**
18. Kronologis pencatatan saham, jumlah saham, nilai nominal, dan harga penawaran dari awal pencatatan hingga akhir tahun buku serta nama bursa efek di mana saham Emiten atau Perusahaan Publik dicatatkan, termasuk pemecahan saham (*stock split*), penggabungan saham (*reverse stock*), dividen saham, saham bonus, dan perubahan nilai nominal saham, pelaksanaan efek konversi, pelaksanaan penambahan dan pengurangan modal (jika ada); Chronology of share listing, number of shares, nominal value, and offering price from the beginning of listing to the end of the financial year as well as the name of the stock exchange where the Issuer's or Public Company's shares are listed, including stock split, reverse stock, share dividends, bonus shares, and changes in the nominal value of shares, exercise of convertible securities, capital increase and decrease (if any);		**97**
19. Informasi pencatatan efek lainnya selain efek sebagaimana dimaksud pada angka 18), yang belum jatuh tempo pada tahun buku paling sedikit memuat nama efek, tahun penerbitan, tingkat suku bunga/imbal hasil, tanggal jatuh tempo, nilai penawaran, dan peringkat efek (jika ada). Information on the listing of other securities besides the securities referred to in number 18), which have not yet matured in the financial year, at least contains the name of the securities, year of issuance, interest/yield rate, maturity date, offering price, and securities rating (if any).		**99**
20. Informasi penggunaan jasa akuntan publik (AP) dan kantor akuntan publik (KAP) beserta jaringan/asosiasi/aliansinya. Information on the use of services from public accounting (AP) and public accounting firm (KAP) and their networks/ associations/alliances.	a. Nama dan alamat; b. Periode penugasan; c. Informasi jasa audit dan/atau non audit yang diberikan; d. Biaya jasa (*fee*) audit dan/atau non audit untuk masing-masing penugasan yang diberikan selama tahun buku; dan e. Dalam hal AP dan KAP beserta jaringan/asosiasi/aliansinya, yang ditunjuk tidak memberikan jasa non audit, maka diungkapkan mengenai informasi tersebut. Pengungkapan informasi penggunaan jasa AP dan KAP beserta jaringan/asosiasi/ aliansinya dapat disajikan dalam bentuk tabel. a. Name and address; b. Assignment period; c. Information on audit and/or non-audit services provided; d. Audit and/or non-audit service fees for each assignment given during the financial year; and e. In the event that the designated AP and KAP and their network/association/ alliance do not provide non-audit services, the information shall be disclosed. Disclosure of information on the use of AP and KAP services and their networks/ associations/alliances can be presented in tabular form.	**102**
21. Nama dan alamat lembaga dan/atau profesi penunjang pasar modal selain AP dan KAP. Profile. Names and addresses of capital market supporting institutions and/or professions other than AP and KAP.		**103**

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Analisis dan Pembahasan Manajemen **Management Discussion and Analysis**		
Analisis dan pembahasan manajemen memuat analisis dan pembahasan mengenai laporan keuangan dan informasi penting lainnya dengan penekanan pada perubahan material yang terjadi dalam tahun buku. Management discussion and analysis contains discussion and analysis of financial statements and other important information with an emphasis on material changes that occurred during the financial year.		
1. Tinjauan operasi per segmen usaha sesuai dengan jenis industri Emiten atau Perusahaan Publik. Overview of operations per business segment according to the type of industry of the Issuer or Public Company.	a. Produksi, yang meliputi proses, kapasitas, dan perkembangannya; b. Pendapatan/penjualan; dan c. Profitabilitas. a. Production, which includes process, capacity, and development; b. Revenue/sales; and c. Profitability.	**108**
2. Kinerja keuangan komprehensif yang mencakup perbandingan kinerja keuangan dalam 2 (dua) tahun buku terakhir, penjelasan tentang penyebab adanya perubahan dan dampak perubahan tersebut. Comprehensive financial performance which includes a comparison of financial performance in the last 2 (two) financial years, with explanation of causes of changes and impact of changes.	a. Aset lancar, aset tidak lancar, dan total aset; b. Liabilitas jangka pendek, liabilitas jangka panjang, dan total liabilitas; c. Ekuitas; d. Pendapatan/penjualan, beban, laba (rugi), penghasilan komprehensif lain, dan total laba (rugi) komprehensif; dan e. Arus kas. a. Current assets, non-current assets, and total assets; b. Current liabilities, non-current liabilities, and total liabilities; c. Equity; d. Revenue/sales, expenses, profit (loss), other comprehensive income, and total comprehensive profit (loss); and e. Cash flows.	**125**
3. Kemampuan membayar utang atau kewajiban dengan menyajikan perhitungan rasio yang relevan. Profile. Debt or liabilities service ability by presenting the calculation of relevant ratio.		**131**
4. Tingkat kolektibilitas piutang Emiten atau Perusahaan Publik dengan menyajikan perhitungan rasio yang relevan. Receivables turnover ratio of the Issuer or Public Company by presenting calculation of relevant ratio.		**131**
5. Struktur modal (*capital structure*) dan kebijakan manajemen atas struktur modal (*capital structure*) tersebut disertai dasar penentuan kebijakan dimaksud. Capital structure and management policy on capital structure accompanied by the basis for determining the said policy.		**133**
6. Bahasan mengenai ikatan yang material untuk investasi barang modal. Discussion on material commitments for capital goods investment.	a. Tujuan dari ikatan tersebut; b. Sumber dana yang diharapkan untuk memenuhi ikatan tersebut; c. Mata uang yang menjadi denominasi; dan d. Langkah yang direncanakan Emiten atau Perusahaan Publik untuk melindungi risiko dari posisi mata uang asing yang terkait. a. The purpose of the commitment; b. The source of funds expected to fulfill the said commitment; c. The currency; and d. Steps planned by the Issuer or Public Company to protect against risks from related foreign currency positions.	**134**
7. Bahasan mengenai investasi barang modal yang direalisasikan dalam tahun buku terakhir. Discussion on capital goods investment realized in the last financial year.	a. Jenis investasi barang modal; b. Tujuan investasi barang modal; dan c. Nilai investasi barang modal yang dikeluarkan. a. Type of capital goods investment; b. The purpose of capital goods investment; and c. The value of capital goods investment.	**134**
8. Informasi dan fakta material yang terjadi setelah tanggal laporan akuntan (jika ada). Information and material facts that occurred after the date of the accountant's report (if any).		**139**

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9. Prospek usaha dari Emiten atau Perusahaan Publik dikaitkan dengan kondisi industri, ekonomi secara umum dan pasar internasional disertai data pendukung kuantitatif dari sumber data yang layak dipercaya. The business prospects of Issuers or Public Companies connected to industry conditions, the general economy and international markets accompanied by quantitative supporting data from reliable data sources.		**123**
10. Perbandingan antara target/proyeksi pada awal tahun buku dengan hasil yang dicapai (realisasi). Comparison between targets/projections at the beginning of financial year and the results achieved (realization).	a. Pendapatan/penjualan; b. Laba (rugi); c. Struktur modal (*capital structure*); atau d. Hal lainnya yang dianggap penting bagi Emiten atau Perusahaan Publik. a. Revenue/sales; b. Profit (loss); c. Capital structure; or d. Other matters deemed important by the Issuer or Public Company.	**135**
11. Target/proyeksi yang ingin dicapai Emiten atau Perusahaan Publik untuk 1 (satu) tahun mendatang. Targets/projections to be achieved by the Issuer or Public Company for the next 1 (one) year.	a. Pendapatan/penjualan; b. Laba (rugi); c. Struktur modal (*capital structure*); d. Kebijakan dividen; atau e. Hal lainnya yang dianggap penting bagi Emiten atau Perusahaan Publik. a. Revenue/sales; b. Profit (loss); c. Capital structure; d. Dividend policy; or e. Other matters deemed important by the Issuer or Public Company.	**136**
12. Aspek pemasaran atas barang dan/atau jasa Emiten atau Perusahaan Publik, paling sedikit mengenai strategi pemasaran dan pangsa pasar. Marketing aspects of the Issuer's or Public Company's goods and/or services, at least regarding marketing strategy and market share.		**111, 112**
13. Uraian mengenai dividen selama 2 (dua) tahun buku terakhir. Description of dividends for the last 2 (two) financial years.	a. Kebijakan dividen, antara lain memuat informasi persentase jumlah dividen yang dibagikan terhadap laba bersih; b. Tanggal pembayaran dividen kas dan/atau tanggal distribusi dividen non kas; c. Jumlah dividen per saham (kas dan/atau non kas); dan d. Jumlah dividen per tahun yang dibayar. Pengungkapan informasi dapat disajikan dalam bentuk tabel. Dalam hal Emiten atau Perusahaan Publik tidak membagikan dividen dalam 2 (dua) tahun terakhir, maka diungkapkan mengenai hal tersebut. a. Dividend policy, including information on the percentage of the amount of dividends distributed to net profit; b. Cash dividend payment date and/or non-cash dividend distribution date; c. Total dividend per share (cash and/or non-cash); and d. The amount of dividends per year paid. Disclosure of information can be presented in tabular form. In the event that the Issuer or Public Company has not distributed dividends in the last 2 (two) years, this shall be disclosed.	**139**
14. Realisasi penggunaan dana hasil penawaran umum. Realization of the use of proceeds from the public offering.	a. Dalam hal selama tahun buku, Emiten memiliki kewajiban menyampaikan laporan realisasi penggunaan dana, maka diungkapkan realisasi penggunaan dana hasil penawaran umum secara kumulatif sampai dengan akhir tahun buku; dan b. Dalam hal terdapat perubahan penggunaan dana sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan mengenai laporan realisasi penggunaan dana hasil penawaran umum, maka Emiten menjelaskan perubahan tersebut. a. In the event that during the financial year, the Issuer has an obligation to submit a report on the realization of use of proceeds, then the cumulative realization of the use of proceeds from the public offering until the end of the financial year shall be disclosed; and b. In the event that there is a change in the use of proceeds as stipulated in the Financial Services Authority Regulation regarding the report on realization of use of proceeds from a public offering, the Issuer shall explain such change.	**139**

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15. Informasi material (jika ada), antara lain mengenai investasi, ekspansi, divestasi, penggabungan/peleburan usaha, akuisisi, restrukturisasi utang/modal, transaksi material, transaksi afiliasi, dan transaksi benturan kepentingan, yang terjadi pada tahun buku.	a. Tanggal, nilai, dan objek transaksi; b. Nama pihak yang melakukan transaksi; c. Sifat hubungan afiliasi (jika ada); d. Penjelasan mengenai kewajaran transaksi; e. Pemenuhan ketentuan terkait; dan f. Dalam hal terdapat hubungan afiliasi, selain mengungkapkan informasi sebagaimana dimaksud dalam huruf a) sampai dengan huruf e), emiten atau perusahaan publik juga mengungkapkan informasi: 1) Pernyataan direksi bahwa transaksi afiliasi telah melalui prosedur yang memadai untuk memastikan bahwa transaksi afiliasi dilaksanakan sesuai dengan praktik bisnis yang berlaku umum antara lain dilakukan dengan memenuhi prinsip transaksi yang wajar (*armslength principle*); dan 2) Peran dewan komisaris dan komite audit dalam melakukan prosedur yang memadai untuk memastikan bahwa transaksi afiliasi dilaksanakan sesuai dengan praktik bisnis yang berlaku umum antara lain dilakukan dengan memenuhi prinsip transaksi yang wajar (*armslength principle*); g. Untuk transaksi afiliasi atau transaksi material yang merupakan kegiatan usaha yang dijalankan dalam rangka menghasilkan pendapatan usaha dan dijalankan secara rutin, berulang, dan/atau berkelanjutan, ditambahkan penjelasan bahwa transaksi afiliasi atau transaksi material tersebut merupakan kegiatan usaha yang dijalankan dalam rangka menghasilkan pendapatan usaha dan dijalankan secara rutin, berulang, dan/atau berkelanjutan; Dalam hal transaksi afiliasi atau transaksi material dimaksud telah diungkapkan dalam laporan keuangan tahunan, ditambahkan informasi mengenai rujukan pengungkapan dalam laporan keuangan tahunan tersebut. h. Untuk pengungkapan transaksi afiliasi dan/atau transaksi benturan kepentingan yang merupakan hasil pelaksanaan transaksi afiliasi dan/atau transaksi benturan kepentingan yang telah disetujui pemegang saham independen, ditambahkan informasi mengenai tanggal pelaksanaan rups yang menyetujui transaksi afiliasi dan/atau transaksi benturan kepentingan tersebut; dan i. Dalam hal tidak terdapat transaksi afiliasi dan/atau transaksi benturan kepentingan, maka diungkapkan mengenai hal tersebut.	**140**
Material information (if any), including investment, expansion, divestment, business merger/consolidation, acquisition, debt/capital restructuring, material transactions, affiliate transactions, and conflict of interest transactions, which occurred in the financial year.	a. Transaction date, value, and object; b. The name of the party making the transaction; c. Nature of affiliate relationship (if any); d. Explanation of the fairness of transaction; e. Fulfillment of related provisions; and f. In the event that there is an affiliation relationship, apart from disclosing the information referred to in letter a) through letter e), the issuer or public company shall also disclose information on: 1) The statement of the board of directors that the affiliated transactions have gone through adequate procedures to ensure that the affiliated transactions are carried out in accordance with the generally accepted business practices, among others, conducted according to fair transaction principles (arm's length principle); and 2) The role of the board of commissioners and audit committee in carrying out adequate procedures to ensure that the affiliated transactions are carried out in accordance with the generally accepted business practices, among others, conducted according to fair transaction principles (arm's length principle); g. For affiliate transactions or material transactions which are business activities carried out in order to generate business income and are carried out routinely, repeatedly, and/or continuously, an explanation is added that the affiliated transactions or material transactions are business activities carried out in order to generate business income and are carried out routinely, repeatedly, and/or continuously; In the event that the affiliated transactions or material transactions referred to have been disclosed in the annual financial statements, information is added regarding references to disclosure in the said annual financial statements. h. For disclosure of affiliated transactions and/or conflict of interest transactions which are the result of executing affiliated transactions and/or conflict of interest transactions that have been approved by independent shareholders, information is added regarding the date of the GMS that approves the said affiliated transactions and/or conflict of interest transactions; and i. In the event that there are no affiliated transactions and/or conflict of interest transactions, this shall be disclosed.	

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16. Perubahan ketentuan peraturan perundang-undangan yang berpengaruh signifikan terhadap Emiten atau Perusahaan Publik dan dampaknya terhadap laporan keuangan (jika ada). Amendments to provisions of laws and regulations that have a significant impact on the Issuer or Public Company and the impact on the financial statements (if any).		**147**
17. Perubahan kebijakan akuntansi, alasan dan dampaknya terhadap laporan keuangan (jika ada). Changes to accounting policies, reasons, and their impact on financial statements (if any).		**149**
Tata Kelola Emiten atau Perusahaan Publik **Governance of Issuers or Public Companies**		
1. Rapat Umum Pemegang Saham (RUPS). General Meeting of Shareholders (GMS).	a. Informasi mengenai keputusan RUPS pada tahun buku dan 1 (satu) tahun sebelum tahun buku meliputi: 1) keputusan RUPS pada tahun buku dan 1 (satu) tahun sebelum tahun buku yang direalisasikan pada tahun buku; dan 2) keputusan RUPS pada tahun buku dan 1 (satu) tahun sebelum tahun buku yang belum direalisasikan beserta alasan belum direalisasikan; b. Dalam hal Emiten atau Perusahaan Publik menggunakan pihak independen dalam pelaksanaan RUPS untuk melakukan perhitungan suara, maka diungkapkan mengenai hal tersebut. a. Information regarding GMS resolutions in the financial year and 1 (one) year before the financial year that includes: 1) GMS resolutions in the financial year and 1 (one) year prior to the financial year realized in the financial year; and 2) GMS resolutions in the financial year and 1 (one) year prior to the financial year which have not been realized and the reasons for not being realized; b. In the event that an Issuer or Public Company uses an independent party in the implementation of the GMS to count the votes, this matter shall be disclosed.	**169**
2. Direksi.	a. Tugas dan tanggung jawab masing-masing anggota Direksi; Informasi mengenai tugas dan tanggung jawab masing-masing anggota Direksi diuraikan dan dapat disajikan dalam bentuk tabel; b. Pernyataan bahwa Direksi memiliki pedoman atau piagam (*charter*) Direksi; c. Kebijakan dan pelaksanaan frekuensi rapat Direksi, rapat Direksi bersama Dewan Komisaris, dan tingkat kehadiran anggota Direksi dalam rapat tersebut termasuk kehadiran dalam RUPS; Informasi tingkat kehadiran anggota Direksi dalam rapat Direksi, rapat Direksi bersama Dewan Komisaris, atau RUPS dapat disajikan dalam bentuk tabel. d. Pelatihan dan/atau peningkatan kompetensi anggota Direksi: 1) Kebijakan pelatihan dan/atau peningkatan kompetensi anggota Direksi, termasuk program orientasi bagi anggota Direksi yang baru diangkat (jika ada); dan 2) Pelatihan dan/atau peningkatan kompetensi yang diikuti anggota Direksi dalam tahun buku (jika ada); e. Penilaian Direksi terhadap kinerja komite yang mendukung pelaksanaan tugas Direksi pada tahun buku paling sedikit memuat: 1) Prosedur penilaian kinerja; dan 2) Kriteria yang digunakan seperti capaian kinerja selama tahun buku, kompetensi dan kehadiran dalam rapat; dan f. Dalam hal Emiten atau Perusahaan Publik tidak memiliki komite yang mendukung pelaksanaan tugas Direksi, maka diungkapkan mengenai hal tersebut.	**179**

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Board of Directors.	a. Duties and responsibilities of each member of the Board of Directors; Information regarding the duties and responsibilities of each member of the Board of Directors is described and can be presented in tabular form; b. Statement that the Board of Directors has Board of Directors guidelines or charter; c. Policy and frequency of Board of Directors' meetings, Board of Directors' joint meetings with the Board of Commissioners, and the attendance level of Board of Directors' members at these meetings including attendance at the GMS; Information on the attendance level of Board of Directors' members at Board of Directors' meetings, Board of Directors' joint meetings with the Board of Commissioners, or the GMS can be presented in tabular form. d. Training and/or competency development for Board of Directors' members: 1) Policy on training and/or competency development for Board of Directors' members, including an orientation program for newly appointed members of the Board of Directors (if any); and 2) Training and/or competency development programs attended by the Board of Directors' members in the financial year (if any); e. The Board of Directors' assessment of the performance of committees that support the implementation of Board of Directors' duties in the financial year that contains at least: 1) Performance assessment procedures; and 2) The criteria used such as performance achievements during the financial year, competence, and attendance at meetings; and f. In the event that the Issuer or Public Company does not have a committee that supports the implementation of Board of Directors' duties, this shall be disclosed.	
3. Dewan Komisaris.	a. Tugas dan tanggung jawab Dewan Komisaris; b. Pernyataan bahwa Dewan Komisaris memiliki pedoman atau piagam (*charter*) Dewan Komisaris; c. Kebijakan dan pelaksanaan frekuensi rapat Dewan Komisaris, rapat Dewan Komisaris bersama Direksi dan tingkat kehadiran anggota Dewan Komisaris dalam rapat tersebut termasuk kehadiran dalam RUPS; Informasi tingkat kehadiran anggota Dewan Komisaris dalam rapat Dewan Komisaris, rapat Dewan Komisaris bersama Direksi, atau RUPS dapat disajikan dalam bentuk tabel. d. Pelatihan dan/atau peningkatan kompetensi anggota Dewan Komisaris: 1) Kebijakan pelatihan dan/atau peningkatan kompetensi anggota Dewan Komisaris, termasuk program orientasi bagi anggota Dewan Komisaris yang baru diangkat (jika ada); dan 2) Pelatihan dan/atau peningkatan kompetensi yang diikuti anggota Dewan Komisaris dalam tahun buku (jika ada); e. Penilaian kinerja Direksi dan Dewan Komisaris serta masing-masing anggota Direksi dan anggota Dewan Komisaris, paling sedikit memuat: 1) Prosedur pelaksanaan penilaian kinerja; 2) Kriteria yang digunakan seperti capaian kinerja selama tahun buku, kompetensi dan kehadiran dalam rapat; dan 3) Pihak yang melakukan penilaian; dan f. Penilaian Dewan Komisaris terhadap kinerja Komite yang mendukung pelaksanaan tugas Dewan Komisaris pada tahun buku meliputi: 1) Prosedur penilaian kinerja; dan 2) Kriteria yang digunakan seperti capaian kinerja selama tahun buku, kompetensi dan kehadiran dalam rapat.	**172**

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Board of Commissioners.	a. Duties and responsibilities of the Board of Commissioners; b. Statement that the Board of Commissioners has Board of Commissioners guidelines or charter; c. Policy and frequency of Board of Commissioners' meetings, Board of Commissioners' joint meetings with the Board of Directors, and the attendance level of Board of Commissioners' members at these meetings including attendance at the GMS; Information on the attendance level of Board of Commissioners' members at Board of Commissioners' meetings, meetings between the Board of Commissioners and the Board of Directors, or the GMS can be presented in tabular form. d. Training and/or competency development for Board of Commissioners' members: 1) Policy on training and/or competency development for Board of Commissioners' members, including an orientation program for newly appointed members of the Board of Commissioners (if any); and 2) Training and/or competency development programs attended by the Board of Commissioners' members in the financial year (if any); e. Assessment of the Board of Directors' performance and the Board of Commissioners as well as of each member of the Board of Directors and the Board of Commissioners, that contains at least: 1) Performance assessment procedures 2) The criteria used such as performance achievements during the financial year, competence, and attendance at meetings; and 3) The assessor; and f. The Board of Commissioners' assessment of the performance of Committees that support the implementation of Board of Commissioners' duties in the financial year that contains at least: 1) Performance assessment procedures; and 2) The criteria used such as performance achievements during the financial year, competence, and attendance at meetings.	
4. Nominasi dan remunerasi Direksi dan Dewan Komisaris.	a. Prosedur nominasi, meliputi uraian singkat mengenai kebijakan dan proses nominasi anggota Direksi dan/atau anggota Dewan Komisaris; dan b. Prosedur dan pelaksanaan remunerasi Direksi dan Dewan Komisaris, antara lain: 1) Prosedur penetapan remunerasi Direksi dan Dewan Komisaris; 2) Struktur remunerasi Direksi dan Dewan Komisaris seperti, gaji, tunjangan, tantiem/bonus dan lainnya; dan 3) Besarnya remunerasi masing-masing anggota Direksi dan anggota Dewan Komisaris; Pengungkapan informasi dapat disajikan dalam bentuk tabel.	**196**
Nomination and remuneration of the Board of Directors and Board of Commissioners.	a. Nomination procedures, including a brief description of the policies and nomination process for members of the Board of Directors and/or members of the Board of Commissioners; and b. Procedures and implementation of remuneration for the Board of Directors and Board of Commissioners, including: 1) Procedures for determining remuneration for the Board of Directors and Board of Commissioners; 2) Remuneration structure for the Board of Directors and Board of Commissioners such as salaries, allowances, tantiem/bonuses, and others; and 3) Remuneration amount for each member of the Board of Directors and members of the Board of Commissioners; Disclosure of information can be presented in tabular form.	
5. Dewan pengawas syariah, bagi Emiten atau Perusahaan Publik yang menjalankan kegiatan usaha berdasarkan prinsip syariah sebagaimana tertuang dalam anggaran Dasar.	a. Nama; b. Dasar hukum pengangkatan dewan pengawas syariah; c. Periode penugasan dewan pengawas syariah; d. Tugas dan tanggung jawab dewan pengawas syariah; dan e. Frekuensi dan cara pemberian nasihat dan saran serta pengawasan pemenuhan prinsip syariah di pasar modal terhadap emiten atau perusahaan publik.	**N/A**
Sharia supervisory board, for Issuers or Public Companies that carry out business activities based on sharia principles as stated in the articles of association.	a. Name; b. The legal basis of appointment of the sharia supervisory board; c. The assignment period of the sharia supervisory board; d. The duties and responsibilities of the sharia supervisory board; and e. Frequency and method of providing advice and suggestions as well as supervising compliance with sharia principles in the capital market applicable to issuers or public companies.	

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6. Komite Audit. Audit Committee.	a. Nama dan jabatannya dalam keanggotaan komite; b. Usia; c. Kewarganegaraan; d. Riwayat pendidikan; e. Riwayat jabatan, meliputi informasi: 1) Dasar hukum penunjukan sebagai anggota komite; 2) Rangkap jabatan, baik sebagai anggota dewan komisaris, anggota direksi, dan/atau anggota komite serta jabatan lainnya (jika ada); dan 3) Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar emiten atau perusahaan publik; f. Periode dan masa jabatan anggota komite audit; g. Pernyataan independensi komite audit; h. Pelatihan dan/atau peningkatan kompetensi yang telah diikuti dalam tahun buku (jika ada); i. Kebijakan dan pelaksanaan frekuensi rapat komite audit dan tingkat kehadiran anggota komite audit dalam rapat tersebut; dan j. Pelaksanaan kegiatan komite audit pada tahun buku sesuai dengan yang dicantumkan dalam pedoman atau piagam (*charter*) komite audit. a. Name and position in committee; b. Age; c. Citizenship; d. Educational history; e. Position history, including information on: 1) Legal basis of appointment as committee member; 2) Concurrent positions, as members of the board of commissioners, members of the board of directors, and/or committee members and other positions (if any); and 3) Work experience and time period inside and outside the issuer or public company; f. Period and term of audit committee members; g. Audit committee independency statement; h. Training and/or competency development programs attended in the financial year (if any); i. Policy and frequency of audit committee's meetings and the attendance level of audit committee's members in these meetings; and j. Implementation of audit committee activities in the financial year according to what is stated in the audit committee guidelines or charter.	**213**
7. Komite atau fungsi nominasi dan remunerasi Emiten atau Perusahaan Publik.	a. Nama dan jabatannya dalam keanggotaan komite; b. Usia; c. Kewarganegaraan; d. Riwayat pendidikan; e. Riwayat jabatan, meliputi informasi: 1) Dasar hukum penunjukan sebagai anggota komite; 2) Rangkap jabatan, baik sebagai anggota dewan komisaris, anggota direksi, dan/atau anggota komite serta jabatan lainnya (jika ada); dan 3) Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar emiten atau perusahaan publik; f. Periode dan masa jabatan anggota komite; g. Pernyataan independensi komite; h. Pelatihan dan/atau peningkatan kompetensi yang telah diikuti dalam tahun buku (jika ada); i. Uraian tugas dan tanggung jawab; j. Pernyataan bahwa telah memiliki pedoman atau piagam (*charter*); k. Kebijakan dan pelaksanaan frekuensi rapat dan tingkat kehadiran anggota dalam rapat tersebut; l. Uraian singkat pelaksanaan kegiatan pada tahun buku; dan m. Dalam hal tidak dibentuk komite nominasi dan remunerasi, emiten atau perusahaan publik cukup mengungkapkan informasi sebagaimana dimaksud dalam huruf i) sampai dengan huruf l) dan mengungkapkan: 1) Alasan tidak dibentuknya komite; dan 2) Pihak yang melaksanakan fungsi nominasi dan remunerasi.	**208**

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Nomination and remuneration committee or function of Issuer or Public Company.	a. Name and position in committee; b. Age; c. Citizenship; d. Educational history; e. Position history, including information on: 1) Legal basis of appointment as committee member; 2) Concurrent positions, as members of the board of commissioners, members of the board of directors, and/or committee members and other positions (if any); and 3) Work experience and time period inside and outside the issuer or public company; f. Period and term of committee members; g. Committee independency statement; h. Training and/or competency development programs attended in the financial year (if any); i. Description of duties and responsibilities; j. Statement that the committee already has a guideline or charter; k. Policy and frequency of meetings and the attendance level of members at the meetings; l. A brief description of the implementation of activities in the financial year; and m. In the event that a nomination and remuneration committee is not formed, it is sufficient for the issuer or public company to disclose the information referred to in letter i) to letter l) and disclose: 1) The reasons for not forming the committee; and 2) Party carrying out nomination and remuneration functions.	
8. Komite lain yang dimiliki Emiten atau Perusahaan Publik dalam rangka mendukung fungsi dan tugas Direksi (jika ada) dan/atau komite yang mendukung fungsi dan tugas Dewan Komisaris.	a. Nama dan jabatannya dalam keanggotaan komite; b. Usia; c. Kewarganegaraan; d. Riwayat pendidikan; e. Riwayat jabatan, meliputi informasi: 1) Dasar hukum penunjukan sebagai anggota komite; 2) Rangkap jabatan, baik sebagai anggota dewan komisaris, anggota direksi, dan/atau anggota komite serta jabatan lainnya (jika ada); dan 3) Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar emiten atau perusahaan publik; f. Periode dan masa jabatan anggota komite; g. Pernyataan independensi komite; h. Pelatihan dan/atau peningkatan kompetensi yang telah diikuti dalam tahun buku (jika ada); dan i. Uraian tugas dan tanggung jawab; j. Pernyataan bahwa telah memiliki pedoman atau piagam (*charter*) komite; k. Kebijakan dan pelaksanaan frekuensi rapat komite dan tingkat kehadiran anggota komite dalam rapat tersebut; dan l. Uraian singkat pelaksanaan kegiatan komite pada tahun buku.	**202, 217**
Other committees established by Issuers or Public Companies in order to support the Board of Directors' functions and duties (if any) and/or committees that support the Board of Commissioners' functions and duties.	a. Name and position in committee; b. Age; c. Citizenship; d. Educational history; e. Position history, including information on: 1) Legal basis of appointment as committee member; 2) Concurrent positions, as members of the board of commissioners, members of the board of directors, and/or committee members and other positions (if any); and 3) Work experience and time period inside and outside the issuer or public company; f. Period and term of committee members; g. Committee independency statement; h. Training and/or competency development programs attended in the financial year (if any); and i. Description of duties and responsibilities; j. Statement that the committee already has a guideline or charter; k. Policy and frequency of committee's meetings and the attendance level of committee members at meetings; and l. A brief description of the implementation of committee's activities in the financial year.	

Kriteria Criteria	Penjelasan Explanation	Halaman Page
9. Sekretaris Perusahaan. Corporate Secretary.	a. Nama; b. Domisili; c. Riwayat jabatan, meliputi: 1) Dasar hukum penunjukan sebagai sekretaris perusahaan; dan 2) Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar emiten atau perusahaan publik; d. Riwayat pendidikan; e. Pelatihan dan/atau peningkatan kompetensi yang diikuti dalam tahun buku; dan f. Uraian singkat pelaksanaan tugas sekretaris perusahaan pada tahun buku. a. Name; b. Domicile; c. Position history, including: 1) Legal basis of appointment as corporate secretary; and 2) Work experience and time period inside and outside the issuer or public company; d. Educational history; e. Training and/or competency development programs attended in the financial year; and f. Brief description of the implementation of corporate secretary's duties in the financial year.	**232**
10. Unit Audit Internal. Internal Audit Unit.	a. Nama kepala unit audit internal; b. Riwayat jabatan, meliputi: 1) Dasar hukum penunjukan sebagai kepala unit audit internal; dan 2) Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar emiten atau perusahaan publik; c. Kualifikasi atau sertifikasi sebagai profesi audit internal (jika ada); d. Pelatihan dan/atau peningkatan kompetensi yang diikuti dalam tahun buku; e. Struktur dan kedudukan unit audit internal; f. Uraian tugas dan tanggung jawab; g. Pernyataan bahwa telah memiliki pedoman atau piagam (*charter*) unit audit internal; dan h. Uraian singkat pelaksanaan tugas unit audit internal pada tahun buku termasuk kebijakan dan pelaksanaan frekuensi rapat dengan direksi, dewan komisaris, dan/atau komite audit. a. Name of the head of internal audit unit; b. Position history, including: 1) Legal basis of appointment as head of internal audit unit; and 2) Work experience and time period inside and outside the issuer or public company; c. Qualification or certification for internal audit profession (if any); d. Training and/or competency development programs attended in the financial year; e. The structure and position of the internal audit unit; f. Description of duties and responsibilities; g. Statement that the internal audit unit already has a guideline or charter; and h. A brief description of the implementation of internal audit unit's duties in the financial year including the policies and frequency of meetings with the board of directors, board of commissioners, and/or audit committee.	**235**
11. Uraian mengenai sistem pengendalian internal (*internal control*) yang diterapkan oleh Emiten atau Perusahaan Publik. Description of internal control system implemented by Issuers or Public Companies.	a. Pengendalian keuangan dan operasional, serta kepatuhan terhadap peraturan perundang-undangan lainnya; b. Tinjauan atas efektivitas sistem pengendalian internal; dan c. Pernyataan direksi dan/atau dewan komisaris atas kecukupan sistem pengendalian internal. a. Financial and operational control, as well as compliance with other laws and regulations; b. Review of the effectiveness of internal control system; and c. Statement of the board of directors and/or board of commissioners on the adequacy of the internal control system.	**241**

Kriteria Criteria	Penjelasan Explanation	Halaman Page
12. Sistem manajemen risiko yang diterapkan oleh Emiten atau Perusahaan Publik. Risk management system implemented by Issuers or Public Companies.	a. Gambaran umum mengenai sistem manajemen risiko Emiten atau Perusahaan Publik; b. Jenis risiko dan cara pengelolaannya; c. Tinjauan atas efektivitas sistem manajemen risiko Emiten atau Perusahaan Publik; dan d. Pernyataan Direksi dan/atau Dewan Komisaris atau komite audit atas kecukupan sistem manajemen risiko. a. General description of the Issuer's or Public Company's risk management system; b. Types of risks and how to manage them; c. Review of the effectiveness of the Issuer's or Public Company's risk management system; and d. Statement of the Board of Directors and/or Board of Commissioners or the audit committee on the adequacy of the risk management system.	**301**
13. Perkara hukum yang berdampak material yang dihadapi oleh Emiten atau Perusahaan Publik, entitas anak, anggota Direksi dan anggota Dewan Komisaris (jika ada). Legal cases with material impacts faced by Issuers or Public Companies, subsidiaries, members of the Board of Directors, and members of the Board of Commissioners (if any).	a. Pokok perkara/gugatan; b. Status penyelesaian perkara/gugatan; dan c. Pengaruhnya terhadap kondisi emiten atau perusahaan Publik. a. Case profile/lawsuit; b. The settlement status of the case/lawsuit; and c. The impact on the issuers or public companies' condition.	**250**
14. Informasi tentang sanksi administratif/sanksi yang dikenakan kepada Emiten atau Perusahaan Publik, anggota Dewan Komisaris dan anggota Direksi, oleh Otoritas Jasa Keuangan dan otoritas lainnya pada tahun buku (jika ada). Information on administrative sanctions/sanctions imposed on Issuers or Public Companies, members of the Board of Commissioners. and members of the Board of Directors, by the Financial Services Authority and other authorities in the financial year (if any).		**252**
15. Informasi mengenai kode etik Emiten atau Perusahaan Publik. Information regarding the code of conduct of Issuers or Public Companies.	a. Pokok-pokok kode etik; b. Bentuk sosialisasi kode etik dan upaya penegakannya; dan c. Pernyataan bahwa kode etik berlaku bagi anggota direksi, anggota Dewan Komisaris, dan karyawan Emiten atau Perusahaan Publik. a. The principles of the code of conduct; b. The form of dissemination of the code of conduct and efforts to enforce it; and c. A statement that the code of conduct applies to members of the board of directors, members of the board of commissioners, and employees of Issuers or Public Companies.	**257**
16. Uraian singkat mengenai kebijakan pemberian kompensasi jangka panjang berbasis kinerja kepada manajemen dan/atau karyawan yang dimiliki oleh Emiten atau Perusahaan Publik (jika ada), antara lain berupa program kepemilikan saham oleh manajemen (*management stock ownership program*/MSOP) dan/atau program kepemilikan saham oleh karyawan (*employee stock ownership program*/ESOP). A brief description of the policy of providing performance-based long-term compensation to management and/or employees owned by Issuers or Public Companies (if any), including but not limited to management stock ownership program (MSOP) and/or employee stock ownership program (ESOP).	Dalam hal pemberian kompensasi berupa program kepemilikan saham oleh manajemen (*management stock ownership program*/MSOP) dan/atau program kepemilikan saham oleh karyawan (*employee stock ownership program*/ESOP), informasi yang diungkapkan paling sedikit memuat: a. Jumlah saham dan/atau opsi; b. Jangka waktu pelaksanaan; c. Persyaratan karyawan dan/atau manajemen yang berhak; dan d. Harga pelaksanaan atau penentuan harga pelaksanaan. In terms of providing compensation in the form of management stock ownership program (MSOP) and/or employee stock ownership program (ESOP), the information disclosed shall contain at least: a. Number of shares and/or options; b. Implementation period; c. Requirements for eligible employee and/or management; and d. Execution price or determination of execution price.	**260**
17. Uraian singkat mengenai kebijakan pengungkapan informasi. A brief description of the information disclosure policy.	a. Kepemilikan saham anggota Direksi dan anggota Dewan Komisaris paling lambat 3 (tiga) hari kerja setelah terjadinya kepemilikan atau setiap perubahan kepemilikan atas saham Perusahaan Terbuka; dan b. Pelaksanaan atas kebijakan dimaksud. a. Share ownership of members of the Board of Directors and members of the Board of Commissioners no later than 3 (three) working days after the ownership or any change in ownership of the Public Company's shares; and b. Implementation of the said policy.	**260**

Kriteria Criteria	Penjelasan Explanation	Halaman Page
18. Uraian mengenai sistem pelaporan pelanggaran (*whistleblowing system*) di Emiten atau Perusahaan Publik. Description of the violation reporting system (whistleblowing system) in Issuers or Public Companies.	a. Cara penyampaian laporan pelanggaran; b. Perlindungan bagi pelapor; c. Penanganan pengaduan; d. Pihak yang mengelola pengaduan; dan e. Hasil dari penanganan pengaduan, paling sedikit: 1) Jumlah pengaduan yang masuk dan diproses dalam tahun buku; dan 2) Tindak lanjut pengaduan. Dalam hal Emiten atau Perusahaan Publik tidak memiliki sistem pelaporan pelanggaran (*whistleblowing system*), maka diungkapkan mengenai hal tersebut. a. Method of submission of violation reports; b. Protection for reporters; c. How to handle the complaints; d. Parties who manage complaints; and e. The results of handling complaints, at least: 1) Number of complaints received and processed in the financial year; and 2) The complaint follow-up. In the event that the Issuer or Public Company does not have a violation reporting system (whistleblowing system), then this matter shall be disclosed.	**263**
19. Uraian mengenai kebijakan anti korupsi Emiten atau Perusahaan Publik. Description of the Issuer's or Public Company's anti-corruption policy.	a. Program dan prosedur yang dilakukan dalam mengatasi praktik korupsi, balas jasa (*kickbacks*), fraud, suap dan/atau gratifikasi dalam Emiten atau Perusahaan Publik; dan b. Pelatihan/sosialisasi anti korupsi kepada karyawan Emiten atau Perusahaan Publik. Dalam hal Emiten atau Perusahaan Publik tidak memiliki kebijakan anti korupsi, maka dijelaskan alasan tidak dimilikinya kebijakan dimaksud. a. Programs and procedures carried out in overcoming corrupt practices, remuneration (kickbacks), fraud, bribes, and/or gratuities in Issuers or Public Companies; and b. Anti-corruption training/dissemination for employees of Issuers or Public Companies. If the Issuer or Public Company does not have an anti-corruption policy, the reasons for not having such a policy shall be explained.	**261**
20. Penerapan atas pedoman tata kelola Perusahaan Terbuka bagi Emiten yang menerbitkan efek bersifat ekuitas atau Perusahaan Publik. Implementation of Public Company governance guidelines for Issuers that issue equity securities or Public Companies.	a. Pernyataan mengenai rekomendasi yang telah dilaksanakan; dan/atau b. Penjelasan atas rekomendasi yang belum dilaksanakan, disertai alasan dan alternatif pelaksanaannya (jika ada). Pengungkapan informasi dapat disajikan dalam bentuk tabel. a. Statement regarding recommendations that have been implemented; and/or b. Explanation of recommendations that have not been implemented, accompanied by reasons and alternatives for implementation (if any). Disclosure of information can be presented in tabular form.	**267**
Tanggung Jawab Sosial dan Lingkungan Emiten atau Perusahaan Publik **Social and Environmental Responsibility of Issuers or Public Companies**		
1. Informasi yang diungkapkan dalam bagian tanggung jawab sosial dan lingkungan merupakan Laporan Keberlanjutan (*Sustainability Report*) sebagaimana dimaksud dalam Peraturan Otoritas Jasa Keuangan No. 51/POJK.03/2017 tentang Penerapan Keuangan Berkelanjutan bagi Lembaga Jasa Keuangan, Emiten, dan Perusahaan Publik. The information disclosed in the social and environmental responsibility section is a Sustainability Report as referred to in the Financial Services Authority Regulation No. 51/POJK.03/2017 on Implementation of Sustainable Finance for Financial Services Institutions, Issuers, and Public Companies.	a. Penjelasan strategi keberlanjutan; b. Ikhtisar aspek keberlanjutan (ekonomi, sosial, dan lingkungan hidup); c. Profil singkat emiten atau perusahaan publik; d. Penjelasan direksi; e. Tata kelola keberlanjutan; f. Kinerja keberlanjutan; g. Verifikasi tertulis dari pihak independen, jika ada; h. Lembar umpan balik (*feedback*) untuk pembaca, jika ada; dan i. Tanggapan emiten atau perusahaan publik terhadap umpan balik laporan tahun sebelumnya. a. Explanation of sustainability strategy; b. An overview of sustainability aspects (economic, social, and environmental); c. Brief profile of the issuer or public company; d. Explanation from the board of directors; e. Sustainability governance; f. Sustainability performance; g. Written verification from an independent party, if any; h. Feedback form for readers, if any; and i. The issuer or public company's response to the previous year's report feedback.	**394**

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2. Laporan Keberlanjutan sebagaimana dimaksud pada angka 1), harus disusun sesuai Pedoman Teknis Penyusunan Laporan Keberlanjutan (*Sustainability Report*) Bagi Emiten dan Perusahaan Publik sebagaimana tercantum dalam Lampiran II yang merupakan bagian tidak terpisahkan dari Surat Edaran Otoritas Jasa Keuangan ini. The Sustainability Report as referred to in number 1), must be prepared in accordance with the Technical Guidelines for Preparing Sustainability Reports For Issuers and Public Companies as listed in Appendix II which is an integral part of this Financial Services Authority Circular.		√
3. Informasi Laporan Keberlanjutan (*Sustainability Report*) pada angka 1) dapat: Sustainability Report information in number 1) can:	a. Diungkapkan pada bagian lain yang relevan di luar bagian tanggung jawab sosial dan lingkungan, seperti penjelasan Direksi terkait Laporan Keberlanjutan diungkapkan dalam bagian terkait Laporan Direksi; dan/atau b. Merujuk pada bagian lain di luar bagian tanggung jawab sosial dan lingkungan dengan tetap mengacu pada Pedoman Teknis Penyusunan Laporan Keberlanjutan (*Sustainability Report*) Bagi Emiten dan Perusahaan Publik sebagaimana tercantum dalam Lampiran II yang merupakan bagian tidak terpisahkan dari Surat Edaran Otoritas Jasa Keuangan ini, seperti profil Emiten atau Perusahaan Publik. a. Be disclosed in other relevant sections outside the social and environmental responsibility section, such as the Board of Directors' explanation regarding the Sustainability Report is disclosed in the related section of the Board of Directors' Report; and/or b. Refer to other sections outside the social and environmental responsibility section while still referring to the Technical Guidelines for Preparing Sustainability Report For Issuers and Public Companies as listed in Appendix II which is an integral part of this Financial Services Authority Circular, such as the profile of the Issuer or Public Company.	√
4. Laporan Keberlanjutan (*Sustainability Report*) sebagaimana dimaksud pada angka 1) merupakan bagian yang tidak terpisahkan dari Laporan Tahunan namun dapat disajikan secara terpisah dengan Laporan Tahunan. Sustainability Report as referred to in number 1) is an integral part of the Annual Report but can be presented separately from the Annual Report.		√
5. Dalam hal Laporan Keberlanjutan disajikan secara terpisah dengan Laporan Tahunan, informasi yang diungkapkan dalam Laporan Keberlanjutan dimaksud harus: In the event that the Sustainability Report is presented separately from the Annual Report, the information disclosed in the Sustainability Report must:	a. Memuat seluruh informasi sebagaimana dimaksud pada angka 1); dan b. Disusun sesuai Pedoman Teknis Penyusunan Laporan Keberlanjutan (*Sustainability Report*) Bagi Emiten dan Perusahaan Publik sebagaimana tercantum dalam Lampiran II yang merupakan bagian tidak terpisahkan dari Surat Edaran Otoritas Jasa Keuangan ini. a. Contain all the information referred to in number 1); and b. Be prepared according to Technical Guidelines for Preparing Sustainability Report for Issuers and Public Companies as listed in Appendix II which is an integral part of this Financial Services Authority Circular.	√
6. Dalam hal Laporan Keberlanjutan disajikan secara terpisah dengan Laporan Tahunan, maka dalam bagian tanggung jawab sosial dan lingkungan memuat informasi bahwa informasi mengenai tanggung jawab sosial dan lingkungan telah diungkapkan dalam Laporan Keberlanjutan yang disajikan secara terpisah dari Laporan Tahunan. In the event that the Sustainability Report is presented separately from the Annual Report, then the social and environmental responsibility section contains information that information regarding social and environmental responsibility has been disclosed in the Sustainability Report which is presented separately from the Annual Report.		-
7. Penyampaian Laporan Keberlanjutan (*Sustainability Report*) yang disajikan secara terpisah dengan Laporan Tahunan harus disampaikan bersamaan dengan penyampaian Laporan Tahunan. Submission of Sustainability Report presented separately from the Annual Report must be submitted together with the submission of the Annual Report.		-

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Laporan Keuangan Tahunan yang Telah Diaudit **Audited Annual Financial Statements**		
Laporan keuangan tahunan yang dimuat dalam Laporan Tahunan disusun sesuai dengan standar akuntansi keuangan di Indonesia dan telah diaudit oleh akuntan publik yang terdaftar di Otoritas Jasa Keuangan. Laporan keuangan tahunan dimaksud memuat pernyataan mengenai pertanggungjawaban atas laporan keuangan sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan mengenai tanggung jawab Direksi atas laporan keuangan atau peraturan perundang-undangan di sektor pasar modal yang mengatur mengenai laporan berkala perusahaan efek dalam hal Emiten merupakan perusahaan efek. The annual financial statements included in the Annual Report are prepared in accordance with Indonesian financial accounting standards and have been audited by a public accountant registered with the Financial Services Authority. The annual financial statements contain a statement regarding accountability for financial statements as stipulated in the Financial Services Authority Regulation regarding the responsibility of the Board of Directors for financial statements or laws and regulations in the capital market sector which regulate periodic reports of securities companies in the event that the Issuer is a securities company.		**461**
Surat Pernyataan Anggota Direksi dan Anggota Dewan Komisaris tentang Tanggung Jawab atas Laporan Tahunan **Statement of Members of the Board of Directors and Members of the Board of Commissioners regarding Responsibility for the Annual Report**		
Surat pernyataan anggota Direksi dan anggota Dewan Komisaris tentang tanggung jawab atas Laporan Tahunan disusun sesuai dengan format Surat Pernyataan Anggota Direksi dan Anggota Dewan Komisaris tentang Tanggung Jawab atas Laporan Tahunan sebagaimana tercantum dalam Lampiran I yang merupakan bagian tidak terpisahkan dari Surat Edaran Otoritas Jasa Keuangan ini. Statements of members of the Board of Directors and members of the Board of Commissioners regarding responsibility for the Annual Report are prepared in accordance with the format of Statement Letters of Members of the Board of Directors and Board of Commissioners regarding Responsibility for Annual Reports as listed in Appendix I which is an integral part of this Financial Services Authority Circular.		**50**



Laporan Keuangan Tanggal 31 Desember 2024

Financial Statements as of 31 December 2024

PT Bank Victoria International 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
for the year ended with independent auditor's report

The original financial statements included herein are in Indonesian language.

PT BANK VICTORIA INTERNATIONAL TBK
LAPORAN KEUANGAN
TANGGAL 31 DESEMBER 2024
DAN UNTUK TAHUN YANG BERAKHIR
PADA TANGGAL TERSEBUT
BESERTA LAPORAN AUDITOR INDEPENDEN

PT BANK VICTORIA INTERNATIONAL TBK
FINANCIAL STATEMENTS
AS OF DECEMBER 31, 2024
AND FOR THE YEAR ENDED
WITH INDEPENDENT AUDITOR'S REPORT

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bank victoria

SURAT PERNYATAAN DEWAN DIREKSI TENTANG TANGGUNG JAWAB ATAS LAPORAN KEUANGAN TANGGAL 31 DESEMBER 2024 DAN UNTUK TAHUN YANG BERAKHIR PADA TANGGAL TERSEBUT PT BANK VICTORIA INTERNATIONAL Tbk

BOARD OF DIRECTORS' STATEMENT REGARDING THE RESPONSIBILITY FOR THE FINANCIAL STATEMENTS AS OF DECEMBER 31, 2024 AND FOR THE YEAR THEN ENDED PT BANK VICTORIA INTERNATIONAL Tbk

Kami, yang bertanda tangan di bawah ini :

We, the undersigned below:

1.	Nama	:	Achmad Friscantono MBA	:	*Name*
	Alamat kantor	:	Graha BIP Lantai 10, Jalan Gatot Subroto Kav. 23, Jakarta Selatan 12930	:	*Office address*
	Alamat domisili atau sesuai KTP	:	Jl. Benda II No.7, RT 002/RW 004, Kel Pulo, Kec.Kebayoran Baru, Jakarta	:	*Domicile address or address according to ID*
	Nomor telepon	:	021-522 8888	:	*Telephone number*
	Jabatan	:	Direktur Utama	:	*Title*
2.	Nama	:	Debora Wahjutirto Tanoyo	:	*Name*
	Alamat kantor	:	Graha BIP Lantai 10, Jalan Gatot Subroto Kav. 23, Jakarta Selatan 12930	:	*Office address*
	Alamat domisili atau sesuai KTP	:	Permata Hijau Blok E/41 RT 011/004, Grogol Utara, Kebayoran Lama	:	*Domicile address or address according to ID*
	Nomor telepon	:	021-522-8888	:	*Telephone number*
	Jabatan	:	Direktur	:	*Title*

menyatakan bahwa:

declare that:

1. Kami bertanggung jawab atas penyusunan dan penyajian laporan keuangan PT Bank Victoria International Tbk;

2. Laporan keuangan PT Bank Victoria International Tbk telah disusun dan disajikan sesuai dengan Standar Akuntansi Keuangan di Indonesia;

3. a. Semua informasi dalam laporan keuangan PT Bank Victoria International Tbk telah dimuat secara lengkap dan benar; dan

   b. Laporan keuangan PT Bank Victoria International Tbk tidak mengandung informasi atau fakta material yang tidak benar, dan tidak menghilangkan informasi atau fakta material;

4. Kami bertanggung jawab atas sistem pengendalian internal dalam PT Bank Victoria International Tbk.

1. *We are responsible for the preparation and presentation of the financial statements of PT Bank Victoria International Tbk;*

2. *The financial statements of PT Bank Victoria International Tbk have been prepared and presented in accordance with Indonesian Financial Accounting Standards;*

3. a. *All information in the financial statements of PT Bank Victoria International Tbk have been fully disclosed in a complete and truthful manner; and*

   b. *The financial statements of PT Bank Victoria International Tbk do not contain any incorrect information or material fact, nor do they omit any information or material fact;*

4. *We are responsible for the internal control system of PT Bank Victoria International Tbk.*

Demikian pernyataan ini dibuat dengan sebenarnya.

This statement is made truthfully.

Jakarta, 6 Maret 2025/*Jakarta, March 6, 2025*

Atas nama dan mewakili Direksi/*For and on behalf of the Board of Directors of*
PT Bank Victoria International Tbk



ACHMAD FRISCANTONO MBA
Direktur Utama/*Vice President Director*

DEBORA WAHJUTIRTO TANOYO
Direktur/ *Director*

Purwantono, Sungkoro & Surja

Indonesia Stock Exchange Building
Tower 2, 7th Floor
Jl. Jend. Sudirman Kav. 52-53
Jakarta 12190, Indonesia

Tel : +62 21 5289 5000
Fax: +62 21 5289 4100
ey.com/id

The original report included herein is in the Indonesian language.

Laporan Auditor Independen

Laporan No. 00147/2.1032/AU.1/07/0242-4/1/III/2025

Pemegang Saham, Dewan Komisaris, dan Direksi
PT Bank Victoria International Tbk

Opini

Kami telah mengaudit laporan keuangan PT Bank Victoria International 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. 00147/2.1032/AU.1/07/0242-4/1/III/2025

The Shareholders and the Boards of Commissioners and Directors
PT Bank Victoria International Tbk

Opinion

We have audited the accompanying financial statements of PT Bank Victoria International Tbk (the "Bank"), which comprise the statement of financial position as of December 31, 2024, and the statement of profit or loss and other comprehensive income, statement of changes in equity, and statement of cash flows for the year then ended, and notes to the financial statements, including material accounting policy information.

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of the Bank as of December 31, 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 audits 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 audits 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.

Building a better working world

The original report included herein is in the Indonesian language.

Laporan Auditor Independen (lanjutan)

Laporan No. 00147/2.1032/AU.1/07/0242-4/1/III/2025 (lanjutan)

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 Bank periode kini. Hal audit utama tersebut disampaikan dalam konteks audit kami atas laporan keuangan secara keseluruhan, dan dalam merumuskan opini kami atas laporan keuangan terkait, dan kami tidak menyatakan suatu opini terpisah atas hal audit utama tersebut. Untuk setiap hal audit utama di bawah ini, penjelasan kami tentang bagaimana audit kami merespons hal tersebut disampaikan dalam konteks tersebut.

Kami telah memenuhi tanggung jawab yang diuraikan dalam paragraf Tanggung Jawab Auditor terhadap Audit atas Laporan Keuangan pada laporan kami, termasuk sehubungan dengan hal-hal audit utama yang dikomunikasikan di bawah ini. Oleh karena itu, audit kami mencakup pelaksanaan prosedur yang didesain untuk merespons penilaian kami atas risiko kesalahan penyajian material dalam laporan keuangan terlampir. Hasil prosedur audit kami, termasuk prosedur yang dilakukan untuk merespons hal-hal audit utama di bawah ini, menyediakan basis bagi opini kami atas laporan keuangan terlampir.

Cadangan kerugian penurunan nilai atas pinjaman yang diberikan

Penjelasan atas hal audit utama:

Pada tanggal 31 Desember 2024, nilai tercatat pinjaman yang diberikan adalah sebesar Rp20,5 triliun, sebelum cadangan penurunan nilai sebesar Rp446,9 miliar. Pengungkapan atas hal ini diuraikan pada Catatan 11 atas laporan keuangan terlampir.

Cadangan kerugian penurunan nilai atas pinjaman yang diberikan adalah hal audit utama bagi kami karena nilai tercatat pinjaman yang diberikan dan cadangan kerugian penurunan nilainya adalah signifikan terhadap laporan keuangan, dan perhitungan cadangan kerugian penurunan nilai tersebut memerlukan penerapan pertimbangan dan estimasi signifikan dari manajemen, yaitu penentuan model untuk menghitung cadangan tersebut, identifikasi eksposur kredit yang mengalami penurunan kualitas kredit yang signifikan, dan penentuan asumsi utama yang digunakan dalam model perhitungan cadangan kerugian penurunan nilai (untuk eksposur yang dinilai secara individu atau kolektif), termasuk faktor-faktor makroekonomi yang bersifat perkiraan masa depan (forward-looking).

Independent Auditor's Report (continued)

Report No. 00147/2.1032/AU.1/07/0242-4/1/III/2025 (continued)

Key audit matters

Key audit matters are those matters that, in our professional judgement, were of most significance in our audit of the financial statements of the current period. Such key audit matters were addressed in the context of our audit of the financial statements taken as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on such key audit matters. For each of the key audit matters below, our description of how our audit addressed such key audit matters is provided in such context.

We have fulfilled the responsibilities described in the Auditor's Responsibilities for the Audit of the Financial Statements paragraph of our report, including in relation to the key audit matters communicated below. Accordingly, our audit included the performance of procedures designed to respond to our assessment of the risks of material misstatements of the accompanying financial statements. The results of our audit procedures, including the procedures performed to address the key audit matters below, provide the basis for our opinion on the accompanying financial statements.

Allowance for impairment losses of loans

Description of the key audit matter:

As of December 31, 2024, the balance of loans was amounted to Rp20.5 trillion, before allowance for impairment amounted to Rp446.9 billion. Disclosures of these matters are described in Notes 11 to the accompanying financial statements.

Allowance for impairment losses of loans is a key audit matter to us because the carrying amounts of loans and the allowance for impairment losses were significant to the financial statements, and the calculation of allowance for impairment losses of loans required application of significant judgment and estimation from the management, such as establishing model to calculate the allowance for impairment, identification of credit exposures with significant deterioration in credit quality, and establishing key assumptions used in the model to calculate allowance for impairment losses (for exposures assessed on an individual or collective basis), which incorporated forward-looking macroeconomic factors.

Laporan Auditor Independen (lanjutan)

Laporan No. 00147/2.1032/AU.1/07/0242-4/1/III/2025 (lanjutan)

Hal audit utama (lanjutan)

Cadangan kerugian penurunan nilai atas pinjaman yang diberikan (lanjutan)

Respons audit:

Kami mengevaluasi dan menguji rancangan dan efektivitas pengendalian utama atas proses pemberian pinjaman, penilaian kualitas pinjaman internal secara teratur, serta pencatatan dan pengawasan pinjaman yang diberikan. Kami memperoleh pemahaman tentang metodologi dan model keuangan untuk perhitungan cadangan kerugian penurunan nilai, serta melakukan validasi atas data masukan (input), dasar dan asumsi utama yang digunakan dalam menghitung cadangan kerugian penurunan nilai dengan membandingkan ke data historis Bank dan informasi pasar yang dapat diobservasi. Kami juga menguji tiga tahapan kualitas kredit portofolio sesuai dengan kriteria tingkatan (staging) yang ditetapkan oleh manajemen untuk pinjaman yang diberikan.

Kami juga menguji konsistensi antara pengalaman historis dan kondisi sekarang dengan kerugian terkini pada portofolio serta menilai kewajaran penyesuaian asumsi masa depan, analisis faktor ekonomi makro, dan beberapa skenario probabilitas tertimbang.

Untuk cadangan kerugian penurunan nilai yang ditentukan secara individual, atas dasar sampel kami mengevaluasi bila identifikasi dilakukan secara tepat waktu terhadap eksposur dengan penurunan kualitas kredit yang signifikan atau yang telah mengalami penurunan nilai. Untuk pinjaman yang diidentifikasi mengalami penurunan nilai, kami menilai asumsi utama atas arus kas masa depan yang akan diterima, termasuk nilai jaminan yang dapat direalisasikan berdasarkan informasi pasar yang tersedia atau penilaian yang dilakukan oleh pakar manajemen atau manajemen sendiri.

Kami memeriksa akurasi matematis perhitungan cadangan kerugian penurunan nilai atas dasar sampel dan menilai kecukupan pengungkapan atas hal-hal ini pada laporan keuangan terlampir. Kami melibatkan pakar auditor kami dalam melakukan prosedur-prosedur di atas sesuai dengan keahliannya.

Independent Auditor's Report (continued)

Report No. 00147/2.1032/AU.1/07/0242-4/1/III/2025 (continued)

Key audit matters (continued)

Allowance for impairment losses of loans (continued)

Audit response:

We evaluated and assessed the design and operating effectiveness of key controls over the process of loan origination, regular internal credit quality assessments, and recording and monitoring of the loans. We gained understanding over methodologies and financial model of the calculation of the impairment losses, and validated inputs, bases, and key assumptions used in calculating the allowance for impairment losses by comparing to the Bank's historical data and observable market data. We also tested the classification into the three-stage credit quality of loan portfolios in accordance with staging criteria established by the management regarding loans.

We also evaluated consistency of historic experience and the current circumstances with recent losses in the portfolios and assessed the reasonableness of forward-looking adjustments, macroeconomic factor analysis and probability-weighted multiple scenarios.

With respect to individually assessed impairment losses, on sample basis we evaluated if timely identification was made for exposures with significant deterioration in credit quality or exposures which have been impaired. For loans identified to be impaired, we assessed key assumptions on the expected futures cash flows, including the value of realizable collateral based on available market information or valuation prepared by the management's expert or the management.

We tested mathematical accuracy of the calculation of allowance for impairment losses on sample basis and we assessed the adequacy of disclosures for these matters in the notes to the accompanying financial statements. We involved our auditor's experts in the performance of these procedures in accordance with their specific expertise.

Laporan Auditor Independen (lanjutan)

Laporan No. 00147/2.1032/AU.1/07/0242-4/1/III/2025 (lanjutan)

Informasi lain

Manajemen bertanggung jawab atas informasi lain. Informasi lain terdiri dari informasi yang tercantum dalam Laporan Tahunan 2024 ("Laporan Tahunan") selain laporan keuangan terlampir dan laporan auditor independen kami. Laporan Tahunan diharapkan akan tersedia bagi kami setelah tanggal laporan auditor independen ini.

Opini kami atas laporan keuangan terlampir tidak mencakup Laporan Tahunan, dan oleh karena itu, kami tidak menyatakan bentuk keyakinan apapun atas Laporan Tahunan tersebut.

Sehubungan dengan audit kami atas laporan keuangan terlampir, tanggung jawab kami adalah untuk membaca Laporan Tahunan ketika tersedia dan, dalam melaksanakannya, mempertimbangkan apakah Laporan Tahunan mengandung ketidakkonsistensian material dengan laporan keuangan terlampir atau pemahaman yang kami peroleh selama audit, atau mengandung kesalahan penyajian material.

Ketika kami membaca Laporan Tahunan, jika kami menyimpulkan bahwa terdapat suatu kesalahan penyajian material di dalamnya, kami diharuskan untuk mengomunikasikan hal tersebut kepada pihak yang bertanggung jawab atas tata kelola dan melakukan tindakan yang tepat berdasarkan peraturan perundang-undangan yang berlaku.

Independent Auditor's Report (continued)

Report No. 00147/2.1032/AU.1/07/0242-4/1/III/2025 (continued)

Other information

Management is responsible for the other information. Other information comprises the information included in the 2024 Annual Report ("The Annual Report") other than the accompanying financial statements and our independent auditor's report thereon. The Annual Report is expected to be made available to us after the date of this independent auditor's report.

Our opinion on the accompanying financial statements does not cover the Annual Report, and accordingly, we do not express any form of assurance on the Annual Report.

In connection with our audit of the accompanying financial statements, our responsibility is to read the Annual Report when it becomes available and, in doing so, consider whether the Annual Report is materially inconsistent with the accompanying financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated.

When we read the Annual Report, if we conclude that there is a material misstatement therein, we are required to communicate the matter to those charged with governance and take appropriate actions based on the applicable laws and regulations.

Laporan Auditor Independen (lanjutan)

Laporan No. 00147/2.1032/AU.1/07/0242-4/1/III/2025 (lanjutan)

Tanggung jawab manajemen dan pihak yang bertanggung jawab atas tata kelola terhadap laporan keuangan

Manajemen bertanggung jawab atas penyusunan dan penyajian wajar laporan keuangan tersebut sesuai dengan Standar Akuntansi Keuangan di Indonesia, dan atas pengendalian internal yang dianggap perlu oleh manajemen untuk memungkinkan penyusunan laporan keuangan yang bebas dari kesalahan penyajian material, baik yang disebabkan oleh kecurangan maupun kesalahan.

Dalam penyusunan laporan keuangan, manajemen bertanggung jawab untuk menilai kemampuan Bank dalam mempertahankan kelangsungan usahanya, mengungkapkan, sesuai dengan kondisinya, hal-hal yang berkaitan dengan kelangsungan usaha, dan menggunakan basis akuntansi kelangsungan usaha, kecuali manajemen memiliki intensi untuk melikuidasi Bank atau menghentikan operasi, atau tidak memiliki alternatif yang realistis selain melaksanakannya.

Pihak yang bertanggung jawab atas tata kelola bertanggung jawab untuk mengawasi proses pelaporan keuangan Bank.

Independent Auditor's Report (continued)

Report No. 00147/2.1032/AU.1/07/0242-4/1/III/2025 (continued)

Responsibilities of management and those charged with governance for the financial statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with Indonesian Financial Accounting Standards, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Bank's ability to continue as a going concern, disclosing, as applicable, matters related to going concern, and using the going concern basis of accounting, unless management either intends to liquidate the Bank or to cease its operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Bank's financial reporting process.

Laporan Auditor Independen (lanjutan)

Laporan No. 00147/2.1032/AU.1/07/0242-4/1/III/2025 (lanjutan)

Tanggung jawab auditor terhadap audit atas laporan keuangan

Tujuan kami adalah untuk memeroleh keyakinan memadai tentang apakah laporan keuangan secara keseluruhan bebas dari kesalahan penyajian material, baik yang disebabkan oleh kecurangan maupun kesalahan, dan untuk menerbitkan laporan auditor independen yang mencakup opini kami. Keyakinan memadai merupakan suatu tingkat keyakinan tinggi, namun bukan merupakan suatu jaminan bahwa audit yang dilaksanakan berdasarkan Standar Audit yang ditetapkan oleh IAPI akan selalu mendeteksi kesalahan penyajian material ketika hal tersebut ada. Kesalahan penyajian dapat disebabkan oleh kecurangan maupun kesalahan dan dianggap material jika, baik secara individual maupun agregat, dapat diekspektasikan secara wajar akan memengaruhi keputusan ekonomi yang diambil oleh pengguna berdasarkan laporan keuangan tersebut.

Sebagai bagian dari suatu audit berdasarkan Standar Audit yang ditetapkan oleh IAPI, kami menerapkan pertimbangan profesional dan mempertahankan skeptisisme profesional selama audit. Kami juga:

- Mengidentifikasi dan menilai risiko kesalahan penyajian material dalam laporan keuangan, baik yang disebabkan oleh kecurangan maupun kesalahan, mendesain dan melaksanakan prosedur audit yang responsif terhadap risiko tersebut, serta memeroleh bukti audit yang cukup dan tepat untuk menyediakan basis bagi opini kami. Risiko tidak terdeteksinya suatu kesalahan penyajian material yang disebabkan oleh kecurangan lebih tinggi dari yang disebabkan oleh kesalahan, karena kecurangan dapat melibatkan kolusi, pemalsuan, penghilangan secara sengaja, pernyataan salah, atau pengabaian atas pengendalian internal.

Independent Auditor's Report (continued)

Report No. 00147/2.1032/AU.1/07/0242-4/1/III/2025 (continued)

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements taken as a whole are free from material misstatement, whether due to fraud or error, and to issue an independent auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with Standards on Auditing established by the IICPA will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with Standards on Auditing established by the IICPA, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to such risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or override of internal control.

Laporan Auditor Independen (lanjutan)

Laporan No. 00147/2.1032/AU.1/07/0242-4/1/III/2025 (lanjutan)

Tanggung jawab auditor terhadap audit atas laporan keuangan (lanjutan)

Sebagai bagian dari suatu audit berdasarkan Standar Audit yang ditetapkan oleh IAPI, kami menerapkan pertimbangan profesional dan mempertahankan skeptisisme profesional selama audit. Kami juga: (lanjutan)

- Memeroleh suatu pemahaman tentang pengendalian internal yang relevan dengan audit untuk mendesain prosedur audit yang tepat sesuai dengan kondisinya, tetapi bukan untuk tujuan menyatakan opini atas keefektivitasan pengendalian internal Bank.

- Mengevaluasi ketepatan kebijakan akuntansi yang digunakan serta kewajaran estimasi akuntansi dan pengungkapan terkait yang dibuat oleh manajemen.

- Menyimpulkan ketepatan penggunaan basis akuntansi kelangsungan usaha oleh manajemen dan, berdasarkan bukti audit yang diperoleh, apakah terdapat suatu ketidakpastian material yang terkait dengan peristiwa atau kondisi yang dapat menyebabkan keraguan signifikan atas kemampuan Bank untuk mempertahankan kelangsungan usahanya. Ketika kami menyimpulkan bahwa terdapat suatu ketidakpastian material, kami diharuskan untuk menarik perhatian dalam laporan auditor independen kami ke pengungkapan terkait dalam laporan keuangan atau, jika pengungkapan tersebut tidak memadai, memodifikasi opini kami. Kesimpulan kami didasarkan pada bukti audit yang diperoleh hingga tanggal laporan auditor independen kami. Namun, peristiwa atau kondisi masa depan dapat menyebabkan Bank 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.

Independent Auditor's Report (continued)

Report No. 00147/2.1032/AU.1/07/0242-4/1/III/2025 (continued)

Auditor's responsibilities for the audit of the financial statements (continued)

As part of an audit in accordance with Standards on Auditing established by the IICPA, we exercise professional judgment and maintain professional skepticism throughout the audit. We also: (continued)

- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Bank's internal control.

- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.

- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Bank's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our independent auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusion is based on the audit evidence obtained up to the date of our independent auditor's report. However, future events or conditions may cause the Bank to cease to continue as a going concern.

- Evaluate the overall presentation, structure, and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

Building a better working world

The original report included herein is in the Indonesian language.

Laporan Auditor Independen (lanjutan)

Laporan No. 00147/2.1032/AU.1/07/0242-4/1/III/2025 (lanjutan)

Tanggung jawab auditor terhadap audit atas laporan keuangan (lanjutan)

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.

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. 00147/2.1032/AU.1/07/0242-4/1/III/2025 (continued)

Auditor's responsibilities for the audit of the financial statements (continued)

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.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the financial statements of the current period and are therefore the key audit matters. We describe such key audit matters in our independent auditor's report unless laws or regulations preclude public disclosure about such key audit matters or when, in extremely rare circumstances, we determine that a key audit matter should not be communicated in our independent auditor's report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

KAP Purwantono, Sungkoro & Surja

Yovita

Registrasi Akuntan Publik No.: AP.0242/*Public Accountant Registration No.: AP.0242*

6 Maret 2025/*March 6, 2025*

00147

PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN POSISI KEUANGAN
Tanggal 31 Desember 2024
(Dinyatakan dalam ribuan Rupiah, kecuali dinyatakan lain)

PT BANK VICTORIA INTERNATIONAL Tbk
STATEMENT OF FINANCIAL POSITION
As of December 31, 2024
(Expressed in thousands of Rupiah, unless otherwise stated)

	31 Desember 2024/ ***December 31, 2024***	**Catatan/** ***Notes***	**31 Desember 2023/** ***December 31, 2023***	
ASET				***ASSETS***
Kas	71.600.262	2d,2i,4	92.820.864	*Cash*
Giro pada Bank Indonesia	1.401.052.981	2d,2j,5	1.493.076.850	*Current accounts with Bank Indonesia*
Giro pada bank lain	114.518.280	2d,2j,	296.298.919	*Current accounts with other banks*
Dikurangi: Cadangan kerugian penurunan nilai	(44.983)	2g,6	(1.726)	*Less: Allowance for impairment losses*
	114.473.297		296.297.193	
Penempatan pada Bank Indonesia dan bank lain	12.200.000	2d,2g,	916.367.530	*Placements with Bank Indonesia and other banks*
Dikurangi: Cadangan kerugian penurunan nilai	(2.745)	2k,7	(998.782)	*Less: Allowance for impairment losses*
	12.197.255		915.368.748	
Efek-efek	7.463.989.140	2d,2g,	6.285.563.736	*Marketable securities*
Dikurangi: Cadangan kerugian penurunan nilai	(1.266.198)	2l,8	(8.271.969)	*Less: Allowance for impairment losses*
	7.462.722.942		6.277.291.767	
Efek-efek yang dibeli dengan janji dijual kembali	197.775.620	2d,2n,9	636.732.554	*Securities purchased under resale agreement*
Pendapatan bunga yang masih akan diterima	320.839.465	2d,2g,10	386.167.151	*Interest income receivables*
Dikurangi: Cadangan kerugian penurunan nilai	(6.087.977)		(17.759.228)	*Less: Allowance for impairment losses*
	314.751.488		368.407.923	
Pinjaman yang diberikan		2d,2g,		*Loans*
- Pihak berelasi	123.467.111	2m,11,39	143.896.441	*Related parties* -
- Pihak ketiga	20.436.393.210		18.484.846.736	*Third parties* -
	20.559.860.321		18.628.743.177	
Dikurangi: Cadangan kerugian penurunan nilai	(446.965.878)		(574.872.202)	*Less: Allowance for impairment losses*
	20.112.894.443		18.053.870.975	
Tagihan akseptasi	17.791.739	2o	12.474.839	*Acceptence receivables*
Penyertaan saham	219.933.809	2p,12	215.930.505	*Investments in shares*
Biaya dibayar dimuka	31.143.626	2t,13	25.465.024	*Prepaid expenses*
Aset tetap dan aset hak-guna	471.188.772	2q,14	505.086.595	*Fixed assets and right-of-use assets*
Dikurangi: Akumulasi penyusutan	(79.755.235)		(81.859.391)	*Less: Accumulated depreciation*
	391.433.537		423.227.204	
Agunan yang diambil alih	544.115.286	2g,2s,15	802.486.682	*Foreclosed assets*
Dikurangi: Cadangan kerugian penurunan nilai	(165.131.092)		(251.870.489)	*Less: Allowance for impairment losses*
	378.984.194		550.616.193	

PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN POSISI KEUANGAN (lanjutan)
Tanggal 31 Desember 2024
(Dinyatakan dalam ribuan Rupiah, kecuali dinyatakan lain)

PT BANK VICTORIA INTERNATIONAL Tbk
STATEMENT OF FINANCIAL POSITION (continued)
As of December 31, 2024
(Expressed in thousands of Rupiah, unless otherwise stated)

	31 Desember 2024/ *December 31, 2024*	**Catatan/ *Notes***	**31 Desember 2023/ *December 31, 2023***	
ASET (lanjutan)				***ASSETS (continued)***
Aset tak berwujud - bersih	11.099.418	2r,16	8.192.813	*Intangible assets - net*
Aset pajak tangguhan - bersih	137.020.678	2ab,22c	163.003.926	*Deferred tax assets - net*
Aset lain-lain	182.450.157	2g,2t,17	103.819.813	*Other assets*
Dikurangi: Cadangan kerugian penurunan nilai	(11.336.194)		(12.356.770)	*Less: Allowance for impairment losses*
	171.113.963		91.463.043	
JUMLAH ASET	**31.045.989.252**		**29.624.240.421**	***TOTAL ASSETS***
LIABILITAS DAN EKUITAS				***LIABILITIES AND EQUITY***
LIABILITAS				***LIABILITIES***
Simpanan nasabah		2d,2u,18,		*Deposit from customers*
- Pihak berelasi	671.950.439	39	1.397.970.027	*Related parties* -
- Pihak ketiga	22.660.161.061		21.031.210.465	*Third parties* -
	23.332.111.500		22.429.180.492	
Simpanan dari bank lain		2d,2u,19,		*Deposits from other banks*
- Pihak berelasi	532.305	39	478.732	*Related parties* -
- Pihak ketiga	590.485.667		1.104.324.627	*Third parties* -
	591.017.972		1.104.803.359	
Efek-efek yang dijual dengan janji dibeli kembali	587.475.014	2d,2n,20	643.266.730	*Securities sold under repurchase agreement*
Efek-efek yang diterbitkan		2v,21,		*Securities issued*
- Pihak berelasi	147.885.000	39	92.730.000	*Related parties* -
- Pihak ketiga	2.162.115.000		1.267.270.000	*Third parties* -
	2.310.000.000		1.360.000.000	
Dikurangi: Biaya emisi yang belum diamortisasi	(20.587.351)		(12.360.472)	*Less: Unamortised issuance cost*
	2.289.412.649		1.347.639.528	
Utang akseptasi	17.005.026	2o	11.959.811	*Acceptance payables*
Utang pajak		2ab,22a		*Taxes payable*
- Pajak penghasilan badan	-		-	*Corporate income tax* -
- Pajak lainnya	26.451.979		29.310.442	*Other taxes* -
	26.451.979		29.310.442	
Liabilitas imbalan kerja karyawan	54.003.307	2ac,24b	39.837.511	*Employee benefits obligation*
Akrual dan liabilitas lain-lain	215.052.147	2d,23	193.457.538	*Accruals and other liabilities*
JUMLAH LIABILITAS	**27.112.529.594**		**25.799.455.411**	***TOTAL LIABILITIES***

PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN POSISI KEUANGAN (lanjutan)
Tanggal 31 Desember 2024
(Dinyatakan dalam ribuan Rupiah, kecuali dinyatakan lain)

PT BANK VICTORIA INTERNATIONAL Tbk
STATEMENT OF FINANCIAL POSITION (continued)
As of December 31, 2024
(Expressed in thousands of Rupiah, unless otherwise stated)

	31 Desember 2024/ ***December 31, 2024***	**Catatan/** ***Notes***	**31 Desember 2023/** ***December 31, 2023***	
LIABILITAS DAN EKUITAS (lanjutan)				***LIABILITIES AND EQUITY (continued)***
EKUITAS				***EQUITY***
Modal saham - nilai nominal Rp100 (nilai penuh) per saham Modal dasar - 41.000.000.000 lembar saham pada 31 Desember 2024 dan 2023 Modal ditempatkan dan disetor penuh - 15.848.532.906 dan 15.848.235.778 masing-masing saham pada tanggal 31 Desember 2024 dan 2023	1.584.853.291	25	1.584.823.578	*Share capital - par value Rp100 (full amount) per share Authorised capital - 41,000,000,000 shares as of December 31, 2024, and 2023 Issued and fully paid capital -15,848,532,906 and 15,848,235,778 shares as of December 31, 2024 and 2023, respectively*
Tambahan modal disetor	668.370.810	26	668.684.728	*Additional paid-in capital*
Kerugian yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain, setelah pajak	(25.504.113)	2d,2l	(16.832.287)	*Unrealised loss on changes in fair value of marketable securities measured at fair value through other comprehensive income, net of tax*
Surplus revaluasi aset tetap, setelah pajak	316.445.478	14	382.456.152	*Gain on revaluation of fixed assets, net of tax*
Pengukuran kembali atas liabilitas imbalan kerja, setelah pajak	11.058.011		19.466.902	*Remeasurements on employee benefit liabilities, net of tax*
Saldo laba:				*Retained earnings:*
- Telah ditentukan penggunaannya	227.200.000	28	202.200.000	*Appropriated*
- Belum ditentukan penggunaannya	1.151.036.181		983.985.937	*Unappropriated*
JUMLAH EKUITAS	**3.933.459.658**		**3.824.785.010**	***TOTAL EQUITY***
JUMLAH LIABILITAS DAN EKUITAS	**31.045.989.252**		**29.624.240.421**	***TOTAL LIABILITIES AND EQUITY***

PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN LABA RUGI DAN PENGHASILAN KOMPREHENSIF LAIN
Untuk Tahun yang Berakhir padaTanggal 31 Desember 2024
(Dinyatakan dalam ribuan Rupiah, kecuali dinyatakan lain)

PT BANK VICTORIA INTERNATIONAL Tbk
STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME
For the Year Ended December 31, 2024
(Expressed in thousands of Rupiah, unless otherwise stated)

	Tahun yang Berakhir pada Tanggal 31 Desember/ *Year Ended December 31,*			
	2024	**Catatan/ *Notes***	**2023**	
PENDAPATAN DAN BEBAN OPERASIONAL				***OPERATING INCOME AND EXPENSES***
Pendapatan bunga	2.076.267.755	2y,29	1.836.391.130	*Interest income*
Beban bunga	(1.527.667.207)	2y, 30	(1.257.661.775)	*Interest expense*
Pendapatan bunga - bersih	**548.600.548**		**578.729.355**	***Interest income - net***
Pendapatan operasional lainnya				***Other operating income***
Pendapatan dari investasi reksadana	21.747.990		13.292.046	*Income from investment in mutual funds*
Keuntungan atas penjualan efek-efek yang diukur pada nilai wajar melalui laba rugi dan penghasilan komprehensif lain - bersih	32.464.070	2d	35.431.712	*Gains on sale of securities measured at fair value through profit or loss and other comprehensive income - net*
Provisi dan komisi selain dari pinjaman	7.888.853	2z	15.679.319	*Fees and commissions from transactions other than loans*
Lain-lain - bersih	303.634.738	31	188.962.184	*Others - net*
Jumlah pendapatan operasional lainnya	**365.735.651**		**253.365.261**	***Total other operating income***
Beban operasional lainnya				***Other operating expenses***
Beban penyisihan kerugian penurunan nilai aset keuangan	(202.042.492)	2g,32	(242.509.120)	*Provision for impairment losses on financial assets*
Pembalikan penyisihan kerugian penurunan nilai aset non-keuangan	86.739.397	2h,32	54.964.162	*Reversal for impairment losses on non-financial assets*
Kerugian atas perubahan nilai wajar penyertaan saham yang diukur pada nilai wajar melalui laba rugi	-	2d,12	(31.877.279)	*Loss on changes in fair value of investment in shares measured at fair value through profit or loss*
Keuntungan/(kerugian) yang belum terealisasi atas perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui laba rugi - bersih	(7.500.945)	2d	3.930.662	*Unrealised profit/(loss) on changes in fair value of securities measured at fair value through profit or loss - net*
Beban umum dan administrasi	(203.382.859)	2aa,33	(158.899.846)	*General and administrative expenses*
Beban tenaga kerja	(175.619.075)	2aa,34	(157.155.510)	*Personnel expenses*
Lain-lain	(119.560.177)	35	(126.476.550)	*Others*
Jumlah beban operasional lainnya	**(621.366.151)**		**(658.023.481)**	***Total other operating expenses***
LABA OPERASIONAL	**292.970.048**		**174.071.135**	***PROFIT FROM OPERATIONS***
Beban Non-Operasional - Bersih	(144.309.924)	36	(44.534.907)	*Non-Operating Expenses - Net*
LABA SEBELUM BEBAN PAJAK PENGHASILAN	**148.660.124**		**129.536.228**	***PROFIT BEFORE INCOME TAX EXPENSE***
BEBAN PAJAK PENGHASILAN - BERSIH	**(30.800.886)**	2ab,22b	**(27.719.887)**	***INCOME TAX EXPENSES - NET***
LABA BERSIH TAHUN BERJALAN	**117.859.238**		**101.816.341**	***NET PROFIT FOR THE YEAR***

Catatan atas laporan keuangan terlampir merupakan bagian integral dari laporan keuangan ini.

The accompanying notes form an integral part of these financial statements.

PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN LABA RUGI DAN PENGHASILAN KOMPREHENSIF LAIN (lanjutan)
Untuk Tahun yang Berakhir pada Tanggal 31 Desember 2024
(Dinyatakan dalam Ribuan Rupiah, kecuali dinyatakan lain)

PT BANK VICTORIA INTERNATIONAL Tbk
STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME (continued)
For the Year Ended December 31, 2024
(Expressed in thousands of Rupiah, unless otherwise stated)

	Tahun yang Berakhir pada Tanggal 31 Desember/ *Year Ended December 31,*			
	2024	**Catatan/ *Notes***	**2023**	
PENGHASILAN KOMPREHENSIF LAIN				***OTHER COMPREHENSIVE INCOME***
Pos-pos yang akan direklasifikasi ke laba rugi				***Items that would be reclassified to profit or loss***
Perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain	(11.117.726)	2d,2l	27.894.092	*Changes in fair value of marketable securities measured at fair value through other comprehensive income*
Pajak tangguhan terkait	2.445.900	22c	(6.136.700)	*Related deferred income tax*
	(8.671.826)		21.757.392	
Pos yang tidak akan direklasifikasi ke laba rugi				***Items that would never be reclassified to profit or loss***
Surplus revaluasi aset - bersih	(66.010.674)	2q	-	*Gain from revaluation asset - net*
Pengukuran kembali atas liabilitas imbalan kerja	(10.780.629)	24b	3.394.639	*Remeasurements on employee benefit liabilities*
Pajak tangguhan terkait	2.371.738	22c	(746.821)	*Related deferred income tax*
	(74.419.565)		2.647.818	
PENGHASILAN (RUGI) KOMPREHENSIF LAIN, SETELAH PAJAK PENGHASILAN	**(83.091.391)**		**24.405.210**	***OTHER COMPREHENSIVE INCOME (LOSS), NET OF INCOME TAX***
JUMLAH PENGHASILAN KOMPREHENSIF	**34.767.847**		**126.221.551**	***TOTAL COMPREHENSIVE INCOME***
LABA BERSIH PER SAHAM				***INCOME PER SHARE***
Dasar (Rupiah penuh)	7,44	2ad,37	6,42	*Basic (full Rupiah)*
Dilusian (Rupiah penuh)	7,44	2ad,37	6,42	*Diluted (full Rupiah)*

PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN PERUBAHAN EKUITAS
Untuk Tahun yang Berakhir pada Tanggal 31 Desember 2024
(Disajikan dalam ribuan Rupiah, kecuali dinyatakan lain)

PT BANK VICTORIA INTERNATIONAL Tbk
STATEMENT OF CHANGES IN EQUITY
For the Year Ended December 31, 2024
(Expressed in thousands of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	Modal ditempatkan dan disetor penuh/ *Issued and fully paid capital*	Tambahan modal disetor/ *Additional paid-in capital*	Kerugian yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain - setelah pajak/ *Unrealised loss on changes in fair value of marketable securities measured at fair value through other comprehensive income - net of tax*	Surplus revaluasi aset tetap - setelah pajak/ *Gain on revaluation of fixed assets - net of tax*	Pengukuran kembali atas liabilitas imbalan kerja - setelah pajak/ *Remeasurements on employee benefit liabilities - net of tax*	Saldo laba/ *Retained earnings*		Jumlah/ *Total*	
							Telah ditentukan penggunaannya/ *Appropriated*	Belum ditentukan penggunaannya/ *Unappropriated*		
Saldo per 1 Januari 2024		**1.584.823.578**	**668.684.728**	**(16.832.287)**	**382.456.152**	**19.466.902**	**202.200.000**	**983.985.937**	**3.824.785.010**	***Balance as of January 1, 2024***
Dana setoran modal	25	29.713	-	-	-	-	-	-	29.713	*Capital deposit fund*
Biaya emisi efek	26	-	(313.918)	-	-	-	-	-	(313.918)	*Issuance cost*
Penghasilan komprehensif lain:										*Other comprehensive income:*
Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain, setelah pajak		-	-	(8.671.826)	-	-	-	-	(8.671.826)	*Financial assets measured at fair value through other comprehensive income, net of tax*
Surplus atas revaluasi aset tetap dan properti terbengkalai - bersih	14,17	-	-	-	8.180.332	-	-	-	8.180.332	*Gain on revaluation of fixed assets and abandoned properties - net*
Reklasifikasi surplus atas revaluasi aset tetap	14	-	-	-	(74.191.006)	-	-	74.191.006	-	*Reclassification of Surplus on revaluation of fixed assets*
Pengukuran Kembali atas liabilitas imbalan kerja		-	-	-	-	(8.408.891)	-	-	(8.408.891)	*Remeasurement on employee benefit liabilities, net of tax*
Pembentukan cadangan umum		-	-	-	-	-	25.000.000	(25.000.000)	-	*Establishment of general reserves*
Laba bersih tahun berjalan		-	-	-	-	-	-	117.859.238	117.859.238	*Net income for the year*
Saldo per 31 Desember 2024		**1.584.853.291**	**668.370.810**	**(25.504.113)**	**316.445.478**	**11.058.011**	**227.200.000**	**1.151.036.181**	**3.933.459.658**	***Balance as of December 31, 2024***

Catatan atas laporan keuangan terlampir merupakan bagian integral dari laporan keuangan ini.

The accompanying notes form an integral part of these financial statements.

PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN PERUBAHAN EKUITAS (lanjutan)
Untuk Tahun yang Berakhir padaTanggal 31 Desember 2024
(Disajikan dalam ribuan Rupiah, kecuali dinyatakan lain)

PT BANK VICTORIA INTERNATIONAL Tbk
STATEMENT OF CHANGES IN EQUITY (continued)
For the Year Ended December 31, 2024
(Expressed in Thousands of Rupiah, Unless otherwise stated)

	Catatan/ *Notes*	Modal ditempatkan dan disetor penuh/ *Issued and fully paid capital*	Tambahan modal disetor/ *Additional paid-in capital*	Keuntungan (kerugian) yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain - setelah pajak/ *Unrealised gains (loss) on changes in fair value of marketable securities measured at fair value through other comprehensive income – net of tax*	Surplus revaluasi aset tetap - setelah pajak/ *Gain on revaluation of fixed assets - net of tax*	Pengukuran kembali atas liabilitas imbalan kerja - setelah pajak/ *Remeasurements on employee benefit liabilities - net of tax*	Saldo laba/ *Retained earnings*		Jumlah/ *Total*	
							Telah ditentukan penggunaannya/ *Appropriated*	Belum ditentukan penggunaannya/ *Unappropriated*		
Saldo per 1 Januari 2023		**1.584.823.471**	**670.584.856**	**(38.589.677)**	**382.456.152**	**16.819.083**	**177.200.000**	**907.169.596**	**3.700.463.481**	***Balance as of January 1, 2023***
Dana setoran modal		107	-	-	-	-	-	-	107	*Capital deposit fund*
Biaya emisi efek	26	-	(1.900.128)	-	-	-	-	-	(1.900.128)	*Appropriation for general reserve*
Penghasilan komprehensif lain:										*Other comprehensive income:*
Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain, setelah pajak		-	-	21.757.390	-	-	-	-	21.757.390	*Financial assets measured at fair value through other comprehensive income, net of tax*
Pengukuran kembali atas liabilitas imbalan kerja, setelah pajak		-	-	-	-	2.647.819	-	-	2.647.819	*Remeasurements on employee benefit liabilities, net of tax*
Pembentukan cadangan umum	25,26	-	-	-	-	-	25.000.000	(25.000.000)	-	*Other equity transactions*
Laba bersih tahun berjalan		-	-	-	-	-	-	101.816.341	101.816.341	*Net income for the year*
Saldo per 31 Desember 2023		**1.584.823.578**	**668.684.728**	**(16.832.287)**	**382.456.152**	**19.466.902**	**202.200.000**	**983.985.937**	**3.824.785.010**	***Balance as of December 31, 2023***

Catatan atas laporan keuangan terlampir merupakan bagian integral dari laporan keuangan ini.

The accompanying notes form an integral part of these financial statements.

PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN ARUS KAS
Untuk Tahun yang Berakhir pada Tanggal 31 Desember 2024
(Dinyatakan dalam ribuan Rupiah, kecuali dinyatakan lain)

PT BANK VICTORIA INTERNATIONAL Tbk
STATEMENT OF CASH FLOWS
For the Year Ended December 31, 2024
(Expressed in thousands of Rupiah, unless otherwise stated)

	Tahun yang berakhir pada tanggal 31 Desember/ *Year Ended December 31,*			
	2024	**Catatan/ *Notes***	**2023**	
ARUS KAS DARI AKTIVITAS OPERASI				***CASH FLOWS FROM OPERATING ACTIVITIES***
Penerimaan dari pendapatan bunga dan komisi	2.141.595.439		1.866.455.131	*Receipt from interest income and commissions*
Pembayaran bunga	(1.498.663.826)		(1.241.689.538)	*Payment of interest expense*
Penerimaan dari pendapatan operasional lainnya	361.686.471		253.716.401	*Receipt from other operating income*
Penerimaan dari penjualan agunan yang diambil alih	206.825.700		385.438.160	*Receipt from sale of foreclosed assets*
Pembayaran beban umum dan administrasi	(175.914.872)		(135.297.898)	*Payment of general and administrative expenses*
Pembayaran beban tenaga kerja	(168.824.753)		(161.897.333)	*Payment of personnel expenses*
Pembayaran beban operasional lainnya	(166.668.398)		(125.072.074)	*Payments of other operating expenses*
Pembayaran pajak penghasilan	-		(16.049.378)	*Payment of income tax*
	700.035.761		825.603.471	
Kenaikan dalam aset operasi:				*Increase in operating assets:*
Pinjaman yang diberikan	(2.321.959.007)		(3.012.792.297)	*Loans*
Beban dibayar dimuka	(5.678.602)		(5.750.347)	*Prepaid expenses*
Aset hak-guna	(2.619.166)		(21.754.778)	*Right-of-use assets*
Tagihan akseptasi	(5.316.900)		-	*Acceptance receivables*
Aset lain-lain	(81.275.966)		9.055.375	*Other assets*
Penurunan dalam aset operasi:				*Decrease in operating assets:*
Efek-efek yang dibeli dengan janji dijual kembali	438.956.934	9	202.699.821	*Securities purchased under resale agreements*
Penyertaan saham	-		26.173.818	*Investments in shares*
Kenaikan dalam kewajiban operasi:				*Increase on operating liabilities:*
Simpanan nasabah	902.931.008		3.057.342.854	*Deposits from customers*
Utang akseptasi	5.045.215		11.959.811	*Acceptance payables*
Penurunan dalam kewajiban operasi:				*Decrease on operating liabilities:*
Simpanan dari bank lain	(513.785.388)		(230.149.261)	*Deposits from other banks*
Efek-efek yang dijual dengan janji dibeli kembali	(55.791.716)	20	402.401.570	*Securities sold under repurchase agreements*
Utang pajak lainnya	(2.858.462)	22a	14.518.346	*Other tax payables*
Arus kas bersih (digunakan untuk)/diperoleh dari aktivitas operasi	**(942.316.289)**		**1.279.308.383**	***Cash flow (used in)/provided from operating activities***

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian integral dari laporan keuangan konsolidasian ini.

The accompanying notes form an integral part of these consolidated financial statements.

PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN ARUS KAS (lanjutan)
Untuk Tahun yang Berakhir pada Tanggal 31 Desember 2024
(Dinyatakan dalam ribuan Rupiah, kecuali dinyatakan lain)

PT BANK VICTORIA INTERNATIONAL Tbk
STATEMENT OF CASH FLOWS (continued)
For the Year Ended December 31, 2024
(Expressed in thousands of Rupiah, unless otherwise stated)

	Tahun yang berakhir pada tanggal 31 Desember/ *Year Ended December 31,*			
	2024	**Catatan *Notes***	**2023**	
ARUS KAS DARI AKTIVITAS INVESTASI				***NET CASH FLOWS FROM INVESTING ACTIVITIES***
Hasil penjualan aset tetap	28.782.400	14	45.395.525	*Proceeds from sale of fixed assets*
Pembelian aset tetap	(19.802.096)	14	(16.195.800)	*Purchase of fixed assets*
Pembelian aset tak berwujud	(5.893.171)	16	(7.289.250)	*Purchase of intangible assets*
Pembelian efek-efek	(1.197.044.074)		(1.435.185.586)	*Purchase of marketable securities*
Arus kas bersih digunakan untuk aktivitas investasi	**(1.193.956.941)**		**(1.413.275.111)**	***Net cash flow used in from investing activities***
ARUS KAS DARI AKTIVITAS PENDANAAN				***CASH FLOWS FROM FINANCING ACTIVITIES***
Penambahan modal disetor	(284.205)		(1.900.021)	*Additional paid-in capital*
Penerbitan obligasi	1.000.000.000	21	500.000.000	*Bonds Issuance*
Pelunasan jatuh tempo obligasi	(50.000.000)	21	(200.000.000)	*Bonds repayment*
Pembayaran sewa	(12.635.205)		(10.757.017)	*Payment for lease*
Arus kas bersih diperoleh dari aktivitas pendanaan	**937.080.590**		**287.342.962**	***Net cash flow provided from financing activities***
KENAIKAN BERSIH KAS DAN SETARA KAS	**(1.199.192.640)**		**153.376.234**	***NET INCREASE OF CASH AND CASH EQUIVALENTS***
KAS DAN SETARA KAS PADA AWAL TAHUN	**2.798.564.163**		**2.645.187.929**	***CASH AND CASH EQUIVALENTS AT BEGINNING OF THE YEAR***
KAS DAN SETARA KAS PADA AKHIR TAHUN	**1.599.371.523**		**2.798.564.163**	***CASH AND CASH EQUIVALENTS AT END OF THE YEAR***
Kas dan setara kas terdiri dari:				*Cash and cash equivalent consist of:*
Kas	71.600.262	4	92.820.864	*Cash*
Giro pada Bank Indonesia	1.401.052.981	5	1.493.076.850	*Current accounts with Bank Indonesia*
Giro pada bank lain	114.518.280	6	296.298.919	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan Bank lain dibawah 3 bulan	12.200.000	7b	916.367.530	*Placements with Bank Indonesia and other Banks less than 3 months*
Jumlah kas dan setara kas	**1.599.371.523**		**2.798.564.163**	***Total cash and cash equivalents***

PT BANK VICTORIA INTERNATIONAL Tbk
CATATAN ATAS LAPORAN KEUANGAN
Tanggal 31 Desember 2024 dan untuk
Tahun yang Berakhir pada Tanggal tersebut
(Disajikan dalam ribuan Rupiah,
kecuali dinyatakan lain)

PT BANK VICTORIA INTERNATIONAL Tbk
NOTES TO THE FINANCIAL STATEMENTS
As of December 31, 2024 and
for the Year Ended
(Expressed in thousands of Rupiah,
unless otherwise stated)

1. INFORMASI UMUM

a. Pendirian dan informasi umum

PT Bank Victoria International Tbk ("Bank") didirikan pada tanggal 28 Oktober 1992 berdasarkan Akta Notaris A. Partomuan Pohan, S.H., LL.M., No. 71 yang selanjutnya diadakan pembetulan dengan Akta No. 30 tanggal 8 Juni 1993 dari Notaris yang sama. Akta pendirian tersebut disahkan oleh Menteri Kehakiman Republik Indonesia melalui Surat Keputusan No. C2-4903.HT.01.01.TH 93 tanggal 19 Juni 1993 dan telah didaftarkan pada Kepaniteraan Pengadilan Negeri Jakarta Utara No. 342/Leg/1993 tanggal 29 Juni 1993 serta telah diumumkan dalam Berita Negara Republik Indonesia No. 39, Tambahan No. 2602 tanggal 15 Mei 1998. Anggaran Dasar Bank telah beberapa kali mengalami perubahan, perubahan terakhir Anggaran Dasar dengan Akta No. 26 tanggal 2 Juli 2024 yang dibuat dihadapan Fathiah Helmi, S.H., Notaris di Jakarta yang telah mendapatkan Penerimaan Pemberitahuan Perubahan Anggaran Dasar dari Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia No. AHU-AH.01.03.0167336 tanggal 2 Juli 2024 dan telah diterima dan dicatat dalam database Sistem Administrasi Badan Hukum Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia No. AHU-0131745.AH.01.11 Tahun 2024 tanggal 2 Juli 2024.

Sesuai dengan Pasal 3 anggaran dasar Bank, ruang lingkup kegiatan Bank adalah menjalankan usaha sebagai bank umum sesuai dengan ketentuan dan perundang-undangan yang berlaku. Bank mulai beroperasi secara komersial pada tanggal 5 Oktober 1994 sesuai dengan izin usaha yang diberikan oleh Menteri Keuangan Republik Indonesia dalam Surat Keputusan No. 402/KMK.017/1994 tanggal 10 Agustus 1994.

Bank telah mendapatkan izin menjadi bank devisa pada tanggal 13 Desember 2016 sesuai dengan Surat Kepala Departemen Perizinan dan Informasi Perbankan - Otoritas Jasa Keuangan No. S-423/PB.12/2016 dan efektif beroperasi menjadi bank devisa pada tanggal 20 Februari 2017. Bank memperoleh izin usaha sebagai pedagang valuta asing dari Bank Indonesia berdasarkan Surat No. 029/126/UOPM tanggal 25 Maret 1997.

1. GENERAL INFORMATION

a. Establishment and general information

PT Bank Victoria International Tbk ("the Bank") was established on October 28, 1992 based on Notarial Deed No. 71 of A. Partomuan Pohan, S.H., LL.M., subsequently amended by Deed No. 30 dated June 8, 1993 from the same notary. The deed of establishment was approved by the Ministry of Justice of the Republic of Indonesia in its Decision Letter No. C2-4903.HT.01.01.TH 93 dated June 19, 1993 and was registered at the State Court Secretary in North Jakarta No. 342/Leg/1993 dated June 29, 1993 also was published in Supplement No. 2602 to the State Gazette of the Republic of Indonesia No. 39 dated May 15, 1998. The Bank's articles of association has been amended several times, and the latest was based on Notarial Deed No. 26 dated July 2, 2024 of Fathiah Helmi, S.H., a notary in Jakarta which has been approved by Ministry of Law and Human Rights of the Republic of Indonesia No. AHU-AH.01.03.0167336 dated July 2, 2024 and has been accepted and recorded in database of Legal Entities Administration System of the Ministry of Law and Human Rights of the Republic of Indonesia in its Letter No. AHU-0131745.AH.01.11 dated July 2, 2024.

According to Article 3 of the Bank's articles of association, the scope of Bank's activities is to engage in commercial banking activities in accordance with the existing regulations. The Bank commenced its commercial operations on October 5, 1994 based on the operating license from the Ministry of Finance of the Republic of Indonesia in its Decision Letter No. 402/KMK.017/1994 dated August 10, 1994.

Bank was approved as a foreign exchange bank on December 13, 2016 in accordance with Head of Licensing and Banking Information Department Letter - Financial Services Authority ("OJK") No. S-423/PB.12/2016 and effectively commenced as a foreign exchange bank on February 20, 2017. The Bank obtained a license as money changer from Bank Indonesia based on Letter No. 029/126/UOPM dated March 25, 1997.

1. INFORMASI UMUM (lanjutan)

a. Pendirian dan informasi umum (lanjutan)

Kantor Pusat Bank berlokasi di Graha BIP Lantai 10, Jalan Gatot Subroto Kav. 23 Jakarta. Bank memiliki kantor pusat, dengan kantor cabang utama, kantor cabang pembantu, dan kantor kas sebagai berikut (tidak diaudit):

1. GENERAL INFORMATION (continued)

a. Establishment and general information (continued)

The Bank's Head Office is located at Graha BIP 10th Floor, Jalan Gatot Subroto Kav. 23 Jakarta. The Bank has operational head office and a number of branches, sub-branches, and cash offices as follows (unaudited):

	31 Desember/*December 31*,		
	2024	**2023**	
Kantor Pusat	1	1	*Head Office*
Kantor Cabang	14	14	*Branches*
Kantor Cabang Pembantu	24	24	*Sub-Branches*

b. Penawaran umum saham dan penerbitan obligasi Bank

Penawaran umum saham

Pada tanggal 4 September 1999, Bank memperoleh pernyataan efektif dari Ketua Badan Pengawas Pasar Modal (Bapepam) melalui Surat No. S-835/PM/1999 untuk melakukan penawaran umum perdana kepada masyarakat sejumlah 250.000.000 saham dengan nilai nominal dan harga penawaran sebesar Rp100 (nilai penuh) per saham dan sejumlah 80.000.000 Waran Seri I. Pada tanggal 30 September 1999, saham tersebut telah dicatatkan pada Bursa Efek Jakarta.

Pada tanggal 14 Agustus 2000, Bank memperoleh pernyataan efektif dari Ketua Bapepam melalui Surat No.S-2044/PM/2000 untuk melakukan Penawaran Umum Terbatas (PUT) I kepada para pemegang saham dalam rangka penerbitan Hak Memesan Efek Terlebih Dahulu sejumlah 614.000.000 saham dengan nilai nominal sebesar Rp100 (nilai penuh) dan harga penawaran sebesar Rp115 (nilai penuh) per saham dan sejumlah 85.960.000 Waran Seri II. Pada tanggal 28 September 2000, saham tersebut telah dicatatkan pada Bursa Efek Jakarta. Dari PUT I ini, jumlah yang diambil oleh pemegang saham yang berhak sejumlah 100.000.000 saham.

Pada tanggal 21 Februari 2003, Bank memperoleh pernyataan efektif dari Ketua Bapepam melalui Surat No. S-36/PM/2003 untuk melakukan PUT II dengan Hak Memesan Efek Terlebih Dahulu sejumlah 705.243.360 saham dengan nilai nominal dan harga penawaran sebesar Rp100 (nilai penuh) per saham dan sejumlah 423.146.016 Waran Seri III.

b. Public offering of the Bank's shares and issuance of bonds

Public offering of shares

On September 4, 1999, the Bank obtained an effective notification from the Chairman of the Capital Market Supervisory Agency (Bapepam) through Letter No. S-835/PM/1999 to conduct an initial public offering of 250,000,000 shares with a par value and an offering price of Rp100 (full amount) per share and 80,000,000 Series I Warrants. On September 30, 1999, the Bank's shares have been listed in Jakarta Stock Exchange.

On August 14, 2000, the Bank obtained an effective notification from the Chairman of Bapepam through Letter No. S-2044/PM/2000 to conduct Limited Public Offering (LPO) I to issue Preemptive Rights of 614,000,000 shares with a par value of Rp100 (full amount) and an offering price of Rp115 (full amount) per share and 85,960,000 Series II Warrants. On September 28, 2000, these shares had been listed in Jakarta Stock Exchange. From LPO I, the shares that were undertaken by the entitled shareholders was 100,000,000 shares.

On February 21, 2003, the Bank obtained an effective notification from the Chairman of Bapepam through Letter No. S-36/PM/2003 to conduct LPO II to issue Pre-emptive Rights of 705,243,360 shares with a par value and an offering price of Rp100 (full amount) per share and 423,146,016 Series III Warrants.

1. INFORMASI UMUM (lanjutan)

b. Penawaran umum saham dan penerbitan obligasi Bank (lanjutan)

Penawaran umum saham (lanjutan)

Pada tanggal 20 Maret 2003, saham tersebut telah dicatatkan pada Bursa Efek Jakarta. Dari PUT II ini, jumlah yang diambil oleh pemegang saham yang berhak sejumlah 400.000.000 saham.

Pada tanggal 12 September 2006, Bank memperoleh pernyataan efektif dari Ketua Badan Pengawas Pasar Modal dan Lembaga Keuangan (Bapepam dan LK) melalui Surat No. S-452/BL/2006 untuk melakukan PUT III sejumlah 670.363.760 saham dengan nilai nominal sebesar Rp100 (nilai penuh) dan harga penawaran sebesar Rp115 (nilai penuh) per saham dan sebanyak-banyaknya 469.277.676 Waran Seri IV. Pada tanggal 13 Juli 2006, saham tersebut telah dicatatkan pada Bursa Efek Indonesia. Dari PUT III ini, jumlah yang diambil oleh pemegang saham yang berhak sejumlah 670.363.760 saham.

Pada tanggal 26 Juni 2008, Bank memperoleh pernyataan efektif dari Ketua Bapepam dan LK melalui Surat No. S-4114/BL/2008 untuk melakukan PUT IV sejumlah 1.167.498.560 saham dengan nilai nominal dan harga penawaran sebesar Rp100 (nilai penuh) per saham dan sejumlah 630.449.220 Waran Seri V.

Pada tanggal 17 September 2011, Bank memperoleh pernyataan efektif dari Ketua Bapepam dan LK melalui Surat No. S-6737/BL/2011 untuk melakukan PUT V sejumlah 1.954.919.259 saham dengan nilai nominal dan harga penawaran sebesar Rp100 (nilai penuh) per saham dan sejumlah 1.448.939.990 Waran Seri VI.

Berikut adalah kronologis jumlah modal saham yang ditempatkan dan disetor penuh serta saham yang dicatatkan pada bursa efek di Indonesia sejak Penawaran Umum Perdana sampai dengan tanggal 31 Desember 2024:

1. GENERAL INFORMATION (continued)

b. Public offering of the Bank's shares and issuance of bonds (continued)

Public offering of shares (continued)

On March 20, 2003, these shares had been listed in Jakarta Stock Exchange. From LPO II, the shares that were undertaken by the entitled shareholders was 400,000,000 shares.

On September 12, 2006, the Bank obtained an effective notification from the Chairman of Capital Market and Financial Institutions Supervisory Agency (Bapepam and LK) through Letter No. S-452/BL/2006 to conduct LPO III of 670,363,760 shares with a par value of Rp100 (full amount) and an offering price of Rp115 (full amount) per share and 469,277,676 Series IV Warrants. On July 13, 2006, these shares had been listed in Indonesia Stock Exchange. From LPO III, the shares that were undertaken by the entitled shareholders was 670,363,760 shares.

On June 26, 2008, the Bank obtained an effective notification from the Chairman of Bapepam and LK through Letter No. S-4114/BL/2008 to conduct LPO IV of 1,167,498,560 shares with a par value and an offering price of Rp100 (full amount) per share and 630,449,220 Series V Warrants.

On September 17, 2011, the Bank obtained an effective notification from the Chairman of Bapepam and LK through Letter No. S-6737/BL/2011 to conduct LPO V of 1,954,919,259 shares with a par value and an offering price of Rp100 (full amount) per share and 1,448,939,990 Series VI Warrants.

The chronological overview of total issued and fully paid capital and shares listed at stock exchange in Indonesia from Initial Public Offering up to December 31, 2024 is as follows:

	Jumlah saham/ *Number of shares*	
Saham yang berasal dari Penawaran Umum Perdana pada tahun 1999	250.000.000	*Shares from Initial Public Offering in 1999*
Saham yang berasal dari pendiri	250.000.000	*Founder's shares*
Saham yang berasal dari kapitalisasi saldo laba	34.000.000	*Shares from capitalisation of retained earnings*

1. INFORMASI UMUM (lanjutan)

b. Penawaran umum saham dan penerbitan obligasi Bank (lanjutan)

Penawaran umum saham (lanjutan)

Berikut adalah kronologis jumlah modal saham yang ditempatkan dan disetor penuh serta saham yang dicatatkan pada bursa efek di Indonesia sejak Penawaran Umum Perdana sampai dengan tanggal 31 Desember 2024: (lanjutan)

1. GENERAL INFORMATION (continued)

b. Public offering of the Bank's shares and issuance of bonds (continued)

Public offering of shares (continued)

The chronological overview of total issued and fully paid capital and shares listed at stock exchange in Indonesia from Initial Public Offering up to December 31, 2024 is as follows: (continued)

	Jumlah saham/ *Number of shares*	
Saham yang berasal dari Penawaran Umum Terbatas I dengan Hak Memesan Efek Terlebih Dahulu pada tahun 2000	100.000.000	*Shares from Limited Public Offering with Preemptive Rights (Rights Issue) I in 2000*
Saham yang berasal dari Pelaksanaan Waran Seri I dan II pada tahun 2002	66.793.400	*Shares from Exercise of Series I and II Warrants in 2002*
Saham yang berasal dari Penawaran Umum Terbatas II dengan Hak Memesan Efek Terlebih Dahulu pada tahun 2003	400.000.000	*Shares from Limited Public Offering with Preemptive Rights (Rights Issue) II in 2003*
Saham yang berasal dari Pelaksanaan Waran Seri III pada tahun 2004	193.799.960	*Shares from Exercise of Series III Warrants in 2004*
Saham yang berasal dari Pelaksanaan Waran Seri III pada tahun 2006	46.200.000	*Shares from Exercise of Series III Warrants in 2006*
Saham yang berasal dari Penawaran Umum Terbatas III dengan Hak Memesan Efek Terlebih Dahulu pada tahun 2006	670.363.760	*Shares from Limited Public Offering with Preemptive Rights (Rights Issue) III in 2006*
Saham yang berasal dari Pelaksanaan Waran Seri IV pada tahun 2007	323.840.000	*Shares from Exercise of Series IV Warrants in 2007*
Saham yang berasal dari Penawaran Umum Terbatas IV dengan Hak Memesan Efek Terlebih Dahulu pada tahun 2008	1.167.498.560	*Shares from Limited Public Offering with Preemptive Rights (Rights Issue) IV in 2008*
Saham yang berasal dari Pelaksanaan Waran Seri IV dan V pada tahun 2009	344.244.500	*Shares from Exercise of Series IV and V Warrants in 2009*
Saham yang berasal dari Pelaksanaan Waran Seri IV dan V pada tahun 2010	249.707.135	*Shares from Exercise of Series IV and V Warrants in 2010*
Saham yang berasal dari Penawaran Umum Terbatas V dengan Hak Memesan Efek Terlebih Dahulu pada tahun 2011	1.954.919.259	*Shares from Limited Public Offering with Preemptive Rights (Rights Issue) V in 2011*
Saham yang berasal dari Penerbitan Saham Tanpa Hak Memesan Efek Terlebih Dahulu pada tahun 2011	414.580.000	*Shares from Issuance of Shares without Preemptive Rights in 2011*
Saham yang berasal dari Pelaksanaan Waran Seri IV dan V pada tahun 2011	81.724.314	*Shares from Exercise of Series IV and V Warrants in 2011*
Saham yang berasal dari Pelaksanaan Waran Seri V dan VI pada tahun 2012	56.673.554	*Shares from Exercise of Series V and VI Warrants in 2012*
Saham yang berasal dari Pelaksanaan Waran Seri V dan VI pada tahun 2013	25.923.831	*Shares from Exercise of Series V and VI Warrants in 2013*
Saham yang berasal dari Pelaksanaan Waran Seri VI pada tahun 2014	508.898.707	*Shares from Exercise of Series VI Warrants in 2014*
Saham yang berasal dari Pelaksanaan Waran Seri VI pada tahun 2015	300	*Shares from Exercise of Series VI Warrants in 2015*
Saham yang berasal dari Pelaksanaan Waran Seri VI pada tahun 2016	751.486.547	*Shares from Exercise of Series VI Warrants in 2016*
Saham yang berasal dari Penerbitan Saham Tanpa Hak Memesan Efek Terlebih Dahulu pada tahun 2016	780.394.335	*Shares from Exercise of Additional Shares Without Preemptive Rights in 2016*
Saham yang berasal dari Penerbitan Saham Tanpa Hak Memesan Efek Terlebih Dahulu pada tahun 2019	280.898.877	*Shares from Exercise of Additional Shares Without Preemptive Rights in 2019*
Saham yang berasal dari Penerbitan Saham Tanpa Hak Memesan Efek Terlebih Dahulu pada tahun 2021	1.535.185.529	*Shares from Exercise of Additional Shares Without Preemptive Rights in 2021*

1. INFORMASI UMUM (lanjutan)

b. Penawaran umum saham dan penerbitan obligasi Bank (lanjutan)

Penawaran umum saham (lanjutan)

Berikut adalah kronologis jumlah modal saham yang ditempatkan dan disetor penuh serta saham yang dicatatkan pada Bursa Efek Indonesia sejak Penawaran Umum Perdana sampai dengan tanggal 31 Desember 2024: (lanjutan)

1. GENERAL INFORMATION (continued)

b. Public offering of the Bank's shares and issuance of bonds (continued)

Public offering of shares (continued)

The chronological overview of total issued and fully paid capital and shares listed at Indonesia Stock Exchange from Initial Public Offering up to December 31, 2024 is as follows: (continued)

	Jumlah saham/ *Number of shares*	
Saham yang berasal dari Penawaran Umum Terbatas VI dengan Hak Memesan Efek Terlebih Dahulu pada tahun 2022	2.553.461.919	*Shares from Limited Public Offering with Preemptive Rights (Rights Issue) VI in 2022*
Saham yang berasal dari Penawaran Umum Terbatas VII dengan Hak Memesan Efek Terlebih Dahulu pada tahun 2022	2.807.640.227	*Shares from Limited Public Offering with Preemptive Rights (Rights Issue) VII in 2022*
Saham yang berasal dari Pelaksanaan Waran Seri VII pada tahun 2023	1.064	*Shares from Exercise of Series VII Warrants in 2023*
Saham yang berasal dari Pelaksanaan Waran Seri VII pada tahun 2024	297.128	*Shares from Exercise of Series VII Warrants in 2024*
Jumlah modal saham yang ditempatkan dan disetor penuh	15.848.532.906 *)	*Total issued and fully paid capital*

*) Jumlah modal saham yang ditempatkan dan disetor penuh termasuk 1% saham yang tidak diperdagangkan pada PT Bursa Efek Indonesia (*delisted*) sesuai ketentuan Peraturan Pemerintah RI No. 29 tahun 1999.

*Number of shares issued and fully paid *) includes 1% of delisted shares in the Indonesia Stock Exchange accordance with Government Regulation No. 29 Year 1999.*

Penawaran umum obligasi

Pada tanggal 28 Desember 1999, Bank memperoleh pernyataan efektif dari Ketua Bapepam melalui Surat No. S-2683/PM/1999 untuk melakukan penawaran umum Obligasi Bank Victoria I Tahun 2000 sejumlah Rp100.000.000. Pada tanggal 14 Maret 2000, Obligasi tersebut telah dicatatkan pada Bursa Efek Surabaya.

Pada tanggal 9 Maret 2007, Bank memperoleh pernyataan efektif dari Ketua Bapepam dan LK melalui Surat No. S-1080/BL/2007 untuk melakukan penawaran umum Obligasi Bank Victoria II Tahun 2007 dan Obligasi Subordinasi Bank Victoria I Tahun 2007 masing-masing sejumlah Rp200.000.000. Pada tanggal 22 Maret 2007, Obligasi-obligasi tersebut telah dicatatkan pada Bursa Efek Indonesia.

Public offering of bonds

On December 28, 1999, the Bank obtained an effective notification from the Chairman of Bapepam through Letter No. S-2683/PM/1999 for the public offering of Bank Victoria Bonds I Year 2000 amounting to Rp100,000,000. On March 14, 2000, the Bonds had been listed in Surabaya Stock Exchange.

On March 9, 2007, the Bank obtained an effective notification from the Chairman of Bapepam and LK through Letter No. S-1080/BL/2007 for the public offering of Bank Victoria Bonds II Year 2007 and Bank Victoria Subordinated Bonds I Year 2007, each amounting to Rp200,000,000. On March 22, 2007, the Bonds had been listed in Indonesia Stock Exchange.

1. INFORMASI UMUM (lanjutan)

b. Penawaran umum saham dan penerbitan obligasi Bank (lanjutan)

Penawaran umum obligasi (lanjutan)

Pada tanggal 19 September 2012, Bank memperoleh pernyataan efektif dari Ketua Bapepam dan LK melalui Surat No. S-7574/BL/2012 untuk melakukan penawaran umum Obligasi Bank Victoria III Tahun 2012 dan Obligasi Subordinasi Bank Victoria II Tahun 2012 masing-masing sejumlah Rp200.000.000 dan Rp300.000.000. Pada tanggal 28 September 2012, Obligasi-obligasi tersebut telah dicatatkan pada Bursa Efek Indonesia.

Pada tanggal 21 September 2017, Bank memperoleh pernyataan efektif dari Dewan Komisioner Otoritas Jasa Keuangan ("OJK") melalui Surat No. S-340/D.04/2017 untuk melakukan penawaran umum Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 dan Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 masing-masing sejumlah Rp300.000.000 dan Rp50.000.000. Pada tanggal 12 Juli 2017, Obligasi-obligasi tersebut telah dicatatkan pada Bursa Efek Indonesia.

Pada tanggal 5 September 2018, Bank melakukan Penawaran Umum Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dan Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018. Obligasi Berkelanjutan yang ditawarkan terdiri dari 2 (dua) seri Obligasi, yaitu Seri A sejumlah Rp100.000.000 dan Seri B sejumlah Rp200.000.000, sedangkan Obligasi Subordinasi sebesar Rp350.000.000.

Pada tanggal 24 September 2019, Bank memperoleh pernyataan efektif dari Dewan Komisioner Otoritas Jasa Keuangan ("OJK") melalui Surat No. S-85/D.04/2019 untuk melakukan Penawaran Umum Berkelanjutan Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 dan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 serta telah dicatatkan pada Bursa Efek Indonesia 1 Juli 2019 masing-masing sejumlah Rp100.000.000 dan Rp250.000.000.

Pada tanggal 8 November 2019, Bank menerbitkan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019 sebesar Rp150.000.000.

1. GENERAL INFORMATION (continued)

b. Public offering of the Bank's shares and issuance of bonds (continued)

Public offering of bonds (continued)

On September 19, 2012, the Bank obtained an effective notification from the Chairman of Bapepam and LK through Letter No. S-7574/BL/2012 for the public offering of Bank Victoria Bonds III Year 2012 and Bank Victoria Subordinated Bonds II Year 2012, amounting to Rp200,000,000 and Rp300,000,000, respectively. On September 28, 2012, the Bonds had been listed in Indonesia Stock Exchange.

On September 21, 2017, the Bank obtained the notice of effectivity from Financial Services Authority Board of Commissioner through Letter No. S-340/D.04/2017 for the public offering of Continuing Bonds I Bank Victoria Phase I year 2017 and Subordinated Bonds I Bank Victoria Phase I Year 2017 in amount of Rp300,000,000 and Rp50,000,000, respectively. On July 12, 2017, these bonds were listed on the Indonesia Stock Exchange.

On September 5, 2018, Bank continues the Public Offering of Bank Victoria Continuing Bonds I Phase II Year 2018 and Bank Victoria Subordinated Bonds I Phase II Year 2018. The Continuing Bonds offered comprise of 2 (two) series, Series A amounted to Rp100,000,000 and Series B amounted to Rp200,000,000, while the Subordinated Bonds offered amounted to Rp350,000,000.

On September 24, 2019, Bank obtained an effective notification from the Chairman of FSA through Letter No. S-85/D.04/2019 for continuous offering of Continuing Bonds II Phase I Year 2019 and Bank Victoria Subordinated Bonds II Phase I Year 2019, which has been listed on the Indonesia Stock Exchange on July 1, 2019, amounting to Rp100,000,000 and Rp250,000,000, respectively.

On November 8, 2019, the Bank issued Bank Victoria Continuing Subordinated Bonds II Phase II Year 2019 amounting to Rp150,000,000.

1. INFORMASI UMUM (lanjutan)

b. Penawaran umum saham dan penerbitan obligasi Bank (lanjutan)

Penawaran umum obligasi (lanjutan)

Pada tanggal 1 April 2020, Bank menerbitkan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020 sebesar Rp60.000.000.

Pada tanggal 28 Februari 2023, Bank memperoleh pernyataan efektif dari Dewan Komisioner Otoritas Jasa Keuangan ("OJK") melalui Surat No. S-64/D.04/2023 untuk melakukan Penawaran Umum Berkelanjutan Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 Seri A dan Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 Seri B serta telah dicatatkan pada Bursa Efek Indonesia pada tanggal 10 Maret 2023 masing-masing sejumlah Rp300.000.000 dan Rp200.000.000.

Pada tanggal 28 Juni 2024, Bank memperoleh pemberitahuan efektifnya pernyataan pendaftaran dari Dewan Komisioner Otoritas Jasa Keuangan ("OJK") melalui Surat No. S-87/D.04/2024 dalam rangka melakukan Penawaran Umum Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap I Tahun 2024 serta telah dicatatkan pada Bursa Efek Indonesia pada tanggal 12 Juli 2024 sejumlah Rp500.000.000.

Pada tanggal 12 Juli 2024, Bank menerbitkan Obligasi Berkelanjutan III Bank Victoria Tahap II Tahun 2024 sebesar Rp500.000.000 (lihat Catatan 21).

c. Entitas anak dan asosiasi

Entitas anak

Bank merupakan pemegang saham pengendali dan memiliki pengaruh signifikan atas Entitas anak sebagai berikut:

1. GENERAL INFORMATION (continued)

b. Public offering of the Bank's shares and issuance of bonds (continued)

Public offering of bonds (continued)

On April 1, 2020, the Bank issued Bank Victoria Continuing Subordinated Bonds II Phase III Year 2020 amounting to Rp60,000,000.

On February 28, 2023, the Bank received an effective statement from the Financial Services Authority's ("OJK") Board of Commissioners through Letter No. S-64/D.04/2023 to conduct a Continuing Public Offering of Bank Victoria Continuing Bonds III Phase I Year 2023 Series A and Bank Victoria Continuing Bonds III Phase I Year 2023 Series B, which were listed on the Indonesian Stock Exchange on March 10, 2023, each amounting to Rp300,000,000 and Rp200,000,000 respectively.

On June 28, 2024, the Bank received an effective statement from the Financial Services Authority's ("OJK") Board of Commissioners through Letter No. S-87/D.04/2024 for the public offering of Bank Victoria Continuing Subordinated Bonds III Phase I Year 2024, which were listed on the Indonesian Stock Exchange on July 12, 2024, amounting to Rp500,000,000.

On July 12, 2024, the Bank issued Bank Victoria Continuing Bonds III Phase II Year 2024 amounting to Rp500,000,000 (refer to Note 21).

c. Subsidiaries and associate entity

Subsidiaries

The Bank is the controlling stockholder and has a significant control over the Subsidiaries as follows:

Entitas Anak/ *Subsidiary*	Jenis usaha/ *Nature of business*	Persentase kepemilikan/ *Percentage of ownership*	Jumlah aset/ *Total Assets* 31 Desember/ *December 31,* 2024	Jumlah aset/ *Total Assets* 31 Desember/ *December 31,* 2023
Reksadana / *Mutual Funds*:				
Batavia Proteksi Andalan 7	Reksadana Terproteksi	100%	162.787.521	154.465.120
Mega Dana Terproteksi VIII	Reksadana Terproteksi	100%	42.499.762	42.485.675
Maybank Dana Terproteksi 1	Reksadana Terproteksi	-	-	44.746.823

1. INFORMASI UMUM (lanjutan)

c. Entitas anak dan asosiasi (lanjutan)

Entitas asosiasi

Entitas Asosiasi/ *Associate Entity*	Jenis usaha/ *Nature of business*	Persentase kepemilikan/ *Percentage of ownership*	Tahun operasi komersial/ *Start of commercial operations*	Jumlah aset/ *Total Assets* 31 Desember/ *December 31,* 2024	Jumlah aset/ *Total Assets* 31 Desember/ *December 31,* 2023
PT Bank Victoria Syariah	Sharia banking	19,81%	1966	3.314.468.601	3.082.278.949

Berdasarkan Akta Notaris Veronika Lily Dharma, S.H. No. 15 tanggal 7 September 2007, Notaris di Jakarta, Bank mengakuisisi 99,80% saham PT Bank Swaguna ("Entitas Anak"). Pada tanggal 13 Desember 2007, Bank melakukan penambahan modal di Entitas Anak sehingga kepemilikan Bank menjadi 99,98% sesuai dengan Akta Notaris Veronika Lily Dharma, S.H. No. 26 tanggal 13 Desember 2007.

Pada tanggal 30 Maret 2017 dan 18 Desember 2017, setelah mendapatkan persetujuan OJK berdasarkan Surat No. S-33/PB.33/2017 tanggal 30 Maret 2017 dan No. S-170/PB.33/2017 tanggal 18 Desember 2017, Bank melakukan penambahan modal pada Entitas Anak sebesar Rp60.000.000.000 dan Rp40.000.000.000 (nilai penuh) sehingga kepemilikan Bank menjadi 99,99%.

Pada tanggal 24 Oktober 2019, Bank melakukan penambahan modal pada Entitas Anak sebesar Rp50.000.000.000 (nilai penuh) sehingga kepemilikan Bank menjadi 99,99% dan telah mendapatkan persetujuan OJK berdasarkan Surat No. S-53/PB.33/2019 tanggal 22 Oktober 2019.

Entitas Anak telah mengalami perubahan nama menjadi PT Bank Victoria Syariah sesuai dengan Akta No. 5 tanggal 6 Agustus 2009 dan Akta No. 24 tanggal 27 November 2009 dari Notaris Erni Rohaini, S.H., M.B.A., Notaris di Jakarta. Akta tersebut telah disetujui oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dalam Surat Keputusan No. AHU-02731.AH.01.02 tahun 2010 tanggal 19 Januari 2010. Perubahan kegiatan usaha bank umum konvensional menjadi bank umum syariah telah mendapatkan izin dari Bank Indonesia berdasarkan Keputusan Gubernur Bank Indonesia No. 12/8/KEP.GBI/DPG/2010 tertanggal 10 Februari 2010. Selanjutnya, Entitas Anak beroperasi dengan prinsip Syariah mulai tanggal 1 April 2010.

1. GENERAL INFORMATION (continued)

c. Subsidiaries and associate entity

Associate entity

Based on Notarial Deed No. 15 dated September 7, 2007 of Veronika Lily Dharma, S.H., a Notary in Jakarta, the Bank acquired 99.80% shareholding of PT Bank Swaguna ("Subsidiary"). On December 13, 2007, the Bank had an additional capital in the Subsidiary which increased the Bank's ownership to 99.98% based on Notarial Deed No. 26 of Veronika Lily Dharma, S.H. dated December 13, 2007.

On March 30, 2017 and December 18, 2017, after obtaining approval from OJK based on Letter No. S-33/PB.33/2017 dated March 30, 2017 and No. S-170/PB.33/2017 dated December 18, 2017, the Bank put additional capital of Rp60,000,000,000 and Rp40,000,000,000 (full amount) into Subsidiary, which increase the Bank's ownership to 99.99%.

On October 24, 2019, the Bank put additional capital of Rp50,000,000,000 (full amount) into Subsidiary, which increase the Bank's ownership to 99.99% and obtained the approval from OJK based on Letter No. S-53/PB.33/2019 dated October 22, 2019.

The Subsidiary changed its name to PT Bank Victoria Syariah based on Deed No. 5 dated August 6, 2009 and No. 24 dated November 27, 2009 of Erni Rohaini, S.H., M.B.A., a Notary in Jakarta. The notarial deed was approved by the Ministry of Law and Human Rights of the Republic of Indonesia in its Decision Letter No. AHU-02731.AH.01.02 Year 2010 dated January 19, 2010. The changes of subsidiary's business from conventional banking to sharia banking was approved by Bank Indonesia based on the Decision of the Governor of Bank Indonesia No. 12/8/KEP.GBI/DPG/2010 dated February 10, 2010. The Subsidiary started its operations as a Sharia Bank on April 1, 2010.

1. INFORMASI UMUM (lanjutan)

c. Entitas Anak dan asosiasi (lanjutan)

Entitas asosiasi (lanjutan)

Pada tanggal 22 Desember 2022, Bank melakukan divestasi 80% kepemilikan di entitas anak, PT Bank Victoria Syariah, oleh karena itu sejak 23 Desember 2022, Bank tidak lagi mengendalikan PT Bank Victoria Syariah.

Reksadana Maybank Dana Terproteksi 1 telah dilikuidasi pada bulan Januari 2024.

d. Dewan Komisaris dan Direksi, Komite dan Karyawan

Susunan Dewan Komisaris dan Direksi Bank pada tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut:

1. GENERAL INFORMATION (continued)

c. Subsidiaries and associate entity

Associate entity (continued)

On December 22, 2022, Bank divested 80% ownership in subsidiary, PT Bank Victoria Syariah, therefore since December 23, 2022, Bank is no longer controlled PT Bank Victoria Syariah.

Maybank Dana Terproteksi 1 mutual funds have been liquidated in January 2024.

d. Boards of Commissioners and Directors, Committee and Employees

The composition of the Bank's Boards of Commissioners and Directors as of December 31, 2024 and 2023 are as follows:

	31 Desember/*December 31*,		
	2024	**2023**	
Dewan Komisaris			***Board of Commissioners***
Komisaris Utama	Zaenal Abidin	Zaenal Abidin	*President Commissioner*
Komisaris Independen	Gunawan Tenggarahardja	Gunawan Tenggarahardja	*Independent Commisioner*
Komisaris	Sia Leng Ho	Sia Leng Ho	*Commissioner*
Direksi			***Board of Directors***
Direktur Utama	Achmad Friscantono	Achmad Friscantono	*President Director*
Wakil Direktur Utama	Rusli	Rusli	*Vice President Director*
Direktur Keuangan	Debora Wahjutirto Tanoyo	Debora Wahjutirto Tanoyo	*Finance Director*
Direktur	Lembing	Lembing	*Director*
Direktur Kepatuhan dan Manajemen Risiko	Tamunan	Tamunan	*Risk Management and Compliance Director*

Susunan Dewan Komisaris dan Direksi pada tanggal 31 Desember 2024 dan 2023 tersebut di atas telah diterima dan dicatat di dalam database Sistem Administrasi Badan Hukum Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia berdasarkan Surat No. AHU-AH.01.09-0067031 tanggal 19 Oktober 2022.

The composition of the Boards of Commissioners and Directors as of December 31, 2024 and 2023 had been accepted and recorded in the database of Legal Entities Administration System of the Ministry of Laws and Human Rights of the Republic of Indonesia in its Letter No. AHU-AH.01.09-0067031 dated October 19, 2022.

Susunan Komite Audit pada tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut:

The composition of the Audit Committee as of December 31, 2024 and 2023 are as follows:

	31 Desember/*December 31*,		
	2024	**2023**	
Ketua	Zaenal Abidin	Zaenal Abidin	*Chairman*
Anggota	Yozef Abdulrachman	Yozef Abdulrachman	*Member*
Anggota	Medi Sejati	Medi Sejati	*Member*

1. INFORMASI UMUM (lanjutan)

d. Dewan Komisaris dan Direksi, Komite dan Karyawan (lanjutan)

Pembentukan Komite Audit Bank telah sesuai dengan Peraturan Otoritas Jasa Keuangan No. 55/POJK.04/2015 tanggal 23 Desember 2015 tentang Pembentukan dan Pedoman Pelaksanaan Kerja Komite Audit dan Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tanggal 14 September 2023 tentang Penerapan Tata Kelola Bagi Bank Umum.

Susunan Komite Pemantau Risiko pada tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut:

	31 Desember/*December 31*, 2024	2023	
Ketua	Zaenal Abidin	Gunawan Tenggarahardja	*Chairman*
Anggota	Gunawan Tenggarahardja	Zaenal Abidin	*Member*
Anggota	Yozef Abdulrachman	Yozef Abdulrachman	*Member*
Anggota	Medi Sejati	Medi Sejati	*Member*

Susunan Komite Nominasi dan Remunerasi pada tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut:

	31 Desember/*December 31*, 2024	2023	
Ketua	Gunawan Tenggarahardja	Gunawan Tenggarahardja	*Chairman*
Anggota	Sia Leng Ho	Sia Leng Ho	*Member*
Anggota	Syahda Candra	Syahda Candra	*Member*

Sekretaris Perusahaan dan Kepala Internal Audit pada tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut:

	31 Desember/*December 31*, 2024	2023	
Sekretaris Perusahaan	Caprie Ardira Azhar	Caprie Ardira Azhar	*Corporate Secretary*
Kepala Internal Audit	Djoko Soenjojo	Djoko Soenjojo	*Internal Audit Head*

Pada tanggal 31 Desember 2024 dan 2023, Bank memiliki karyawan masing-masing sejumlah 746 dan 713 karyawan (tidak diaudit).

e. Pemegang saham akhir

Pemegang saham pengendali langsung dan pemegang saham akhir Bank pada tanggal 31 Desember 2024 dan 2023 adalah masing-masing PT Victoria Investama Tbk dan Suzanna Tanojo.

1. GENERAL INFORMATION (continued)

d. Boards of Commissioners and Directors, Committee and Employees (continued)

Establishment of the Bank's Audit Committee is in compliance with Financial Service Authority regulation No. 55/POJK.04/2015 dated December 23, 2015 regarding Establishment and Guideline for Implementation Duty of Audit Committee and Financial Service Authority regulation No. 17 Year 2023 dated September 14, 2023 regarding the Implementation of Governance for Commercial Banks.

The composition of the Risk Monitoring Committee as of December 31, 2024 and 2023 are as follows:

	31 Desember/*December 31*, 2024	2023	
Ketua	Zaenal Abidin	Gunawan Tenggarahardja	*Chairman*
Anggota	Gunawan Tenggarahardja	Zaenal Abidin	*Member*
Anggota	Yozef Abdulrachman	Yozef Abdulrachman	*Member*
Anggota	Medi Sejati	Medi Sejati	*Member*

The composition of the Nomination and Remuneration Committee as of December 31, 2024 and 2023 are as follows:

	31 Desember/*December 31*, 2024	2023	
Ketua	Gunawan Tenggarahardja	Gunawan Tenggarahardja	*Chairman*
Anggota	Sia Leng Ho	Sia Leng Ho	*Member*
Anggota	Syahda Candra	Syahda Candra	*Member*

The Corporate Secretary and Internal Audit Head as of December 31, 2024 and 2023 are as follows:

	31 Desember/*December 31*, 2024	2023	
Sekretaris Perusahaan	Caprie Ardira Azhar	Caprie Ardira Azhar	*Corporate Secretary*
Kepala Internal Audit	Djoko Soenjojo	Djoko Soenjojo	*Internal Audit Head*

As of December 31, 2024 and 2023, the Bank had 746 and 713 employees, respectively (unaudited).

e. Ultimate shareholders

The direct controlling shareholder and ultimate shareholder of the Bank as of December 31, 2024 and 2023 are PT Victoria Investama Tbk and Suzanna Tanojo, respectively.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL

Manajemen Bank bertanggungjawab atas penyusunan dan penyajian wajar laporan keuangan ini sesuai dengan Standar Akuntansi Keuangan di Indonesia, yang diselesaikan dan diotorisasi untuk diterbitkan oleh Direksi Bank pada tanggal 6 Maret 2025.

Kebijakan akuntansi utama yang diterapkan dalam penyusunan laporan keuangan adalah seperti dijabarkan di bawah ini:

a. Dasar penyajian laporan keuangan

Laporan keuangan telah disusun dan disajikan sesuai dengan dengan Standar Akuntansi Keuangan di Indonesia yang mencakup Pernyataan dan Interpretasi yang diterbitkan oleh Dewan Standar Akuntansi Keuangan Ikatan Akuntan Indonesia dan Dewan Standar Akuntansi Ikatan Akuntan Indonesia serta Peraturan Badan Pengawas Pasar Modal dan Lembaga Keuangan (sekarang Otoritas Jasa Keuangan ("OJK")) No. VIII.G.7 tentang "Penyajian dan Pengungkapan Laporan Keuangan Emiten atau Perusahaan Publik".

Laporan keuangan disusun berdasarkan harga perolehan kecuali untuk aset keuangan yang diukur pada nilai wajar melalui pendapatan komprehensif lain ("FVOCI") dan aset keuangan yang diukur pada nilai wajar melalui laporan laba rugi ("FVTPL"). Laporan keuangan disusun berdasarkan akuntansi berbasis akrual, kecuali untuk laporan arus kas.

Seluruh angka dalam laporan keuangan ini, kecuali dinyatakan secara khusus, dibulatkan menjadi dan disajikan dalam ribuan Rupiah yang terdekat.

Laporan arus kas disusun dengan menggunakan metode langsung dengan mengelompokkan arus kas dalam aktivitas operasi, investasi, dan pendanaan. Untuk tujuan laporan arus kas, kas dan setara kas mencakup kas, giro pada Bank Indonesia, giro pada bank lain, penempatan pada Bank Indonesia dan bank lain, dan Sertifikat Bank Indonesia yang jatuh tempo dalam 3 (tiga) bulan atau kurang sejak tanggal perolehan yang tidak dijaminkan atau dibatasi penggunaannya.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION

The Bank's management is responsible for the preparation and fair presentation of these financial statements, which were completed and authorised for issuance by the Board of Directors of the Bank on March 6, 2025.

The principal accounting policies adopted in preparing the financial statements of the Bank are set out below:

a. Basis of preparation of the financial statements

The financial statements were prepared and presented in accordance with Indonesian Financial Accounting Standards issued by the Board of Financial Accounting Standards of Indonesian Institute of Accountants and the Board of Accounting Standards of the Indonesian Institute of Accountants and the Regulation of Badan Pengawas Pasar Modal dan Lembaga Keuangan (currently the Indonesian Financial Service Authority ("OJK")) No. VIII.G.7 regarding "Financial Statements Presentation Guidelines".

The financial statements have been prepared under the historical cost convention, except for financial assets measure as fair value through other comprehensive income ("FVOCI") and financial assets held at fair value through profit or loss ("FVTPL"). The financial statements are prepared under the accrual basis of accounting, except for the statement of cash flows.

All figures in the financial statements are rounded to and stated in thousands of Rupiah, unless otherwise stated.

The statement of cash flows were prepared based on the direct method with cash flows classified into cash flows from operating, investing, and financing activities. For the purpose of the statement of cash flows, cash and cash equivalents include cash, current accounts with Bank Indonesia, current accounts with other banks, placements with Bank Indonesia and other banks, and Certificates of Bank Indonesia maturing within 3 (three) months or less from the date of acquisition and are not pledged or restricted.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

a. Dasar penyajian laporan keuangan (lanjutan)

Penyusunan laporan keuangan sesuai dengan Standar Akuntansi Keuangan di Indonesia mengharuskan penggunaan estimasi dan asumsi. Hal tersebut juga mengharuskan manajemen untuk membuat pertimbangan dalam proses penerapan kebijakan akuntansi Bank. Area yang kompleks atau memerlukan tingkat pertimbangan yang lebih tinggi atau area di mana asumsi dan estimasi dapat berdampak signifikan terhadap laporan keuangan diungkapkan di Catatan 3.

b. Perubahan kebijakan akuntansi yang signifikan

Bank menerapkan pertama kali seluruh standar baru dan/atau yang direvisi yang berlaku efektif untuk periode yang dimulai pada atau setelah 1 Januari 2024, termasuk standar yang direvisi berikut ini yang mempengaruhi laporan keuangan:

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.

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.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

a. Basis of preparation of the financial statements (continued)

The preparation of financial statements in accordance with Indonesian Financial Accounting Standards requires the use of estimates and assumptions. It also requires management to make judgments in the process of implementing the Bank's accounting policies. The area that is complex or requires a higher level of consideration or areas where assumptions and estimates could have a significant impact on the financial statements are disclosed in Note 3.

b. Change in significant accounting policies

The Bank made first time adoption of all the new and/or revised standards effective for the periods beginning on or after January 1, 2024, including the following revised standards that have affected the financial statement:

Financial Accounting Standards Pillars

These standards provides requirements and guidelines for entities to apply the correct financial accounting standards in preparing general purpose financial statements. There will be 4 (four) financial accounting standards that are currently applied in Indonesia, namely:

1. *Pillar 1 International Financial Accounting Standards,*
2. *Pillar 2 Indonesian Financial Accounting Standards (SFAS),*
3. *Pillar 3 Indonesian Financial Accounting Standards for Private Entities/Indonesian Financial Accounting Standards for Entities without Public Accountability, and*
4. *Pillar 4 Indonesian Financial Accounting Standards for Micro Small and Medium Entities.*

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.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

b. Perubahan kebijakan akuntansi yang signifikan (lanjutan)

Nomenklatur Standar Akuntansi Keuangan

Standar ini ini mengatur penomoran baru untuk standar akuntansi keuangan yang berlaku di Indonesia yang diterbitkan oleh DSAK IAI.

Amandemen PSAK 201 (dahulu PSAK 1): Liabilitas Jangka Panjang dengan Kovenan

Amandemen ini menentukan persyaratan untuk mengklasifikasikan suatu liabilitas sebagai jangka pendek atau jangka panjang dan menjelaskan:

- hal yang dimaksud sebagai hak untuk menangguhkan pelunasan,
- hak untuk menangguhkan pelunasan harus ada pada akhir periode pelaporan,
- klasifikasi tersebut tidak dipengaruhi oleh kemungkinan entitas akan menggunakan hak nya untuk menangguhkan liabilitas, dan
- hanya jika derivatif melekat pada liabilitas konversi tersebut adalah suatu instrumen ekuitas, maka syarat dan ketentuan dari suatu liabilitas konversi tidak akan berdampak pada klasifikasinya.

Selain itu, persyaratan telah diperkenalkan untuk mewajibkan pengungkapan ketika suatu kewajiban timbul dari pinjaman perjanjian diklasifikasikan sebagai tidak lancar dan hak entitas untuk menunda penyelesaian bergantung pada kepatuhan terhadap persyaratan di masa depan dalam waktu dua belas bulan.

Amandemen PSAK 116 (dahulu PSAK 73): Liabilitas Sewa dalam Jual Beli dan Sewa-balik

Amandemen PSAK 116 (dahulu PSAK 73) Sewa menetapkan persyaratan yang digunakan penjual-penyewa dalam mengukur kewajiban sewa yang timbul dalam transaksi jual beli dan sewa-balik, untuk memastikan penjual-penyewa tidak mengakui jumlah setiap keuntungan atau kerugian yang terkait dengan hak guna yang dipertahankan.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

b. Change in significant accounting policies (continued)

Financial Accounting Standards Nomenclature

This standard regulates the new numbering for financial accounting standards applicable in Indonesia issued by DSAK IAI.

Amendment of SFAS 201 (previously SFAS 1): Non-current Liabilities with Covenants

The amendments specify the requirements for classifying liabilities as current or non-current and clarify:

- *what is meant by a right to defer settlement,*
- *the right to defer must exist at the end of the reporting period,*
- *classification is not affected by the likelihood that an entity will exercise its deferral right, and*
- *only if an embedded derivative in a convertible liability is an equity instrument would the terms and conditions of a liability will not impact its classification.*

In addition, a requirement has been introduced to require disclosure when a liability arising from a loan
agreement is classified as non-current and the entity's right to defer settlement is contingent on compliance with future covenants within twelve months.

Amendment of SFAS 116 (previously SFAS 73): Lease liability in a Sale and Leaseback

The amendment to SFAS 116 (previously SFAS 73) Leases specifies the requirements that a seller-lessee uses in measuring the lease liability arising in a sale and leaseback transaction, to ensure the seller-lessee does not recognise any amount of the gain or loss that relates to the right of use it retains.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

b. Perubahan kebijakan akuntansi yang signifikan (lanjutan)

Amandemen PSAK 207 dan PSAK 107 (dahulu PSAK 2 dan PSAK 60): Pengaturan Pembiayaan Pemasok

Amandemen PSAK 207 dan PSAK 107 (dahulu PSAK 2 dan PSAK 60) mengklarifikasi karakteristik pengaturan pembiayaan pemasok dan mensyaratkan pengungkapan tambahan atas pengaturan pembiayaan pemasok tersebut. Persyaratan pengungkapan dalam amandemen ini dimaksudkan untuk membantu pengguna laporan keuangan dalam memahami dampak pengaturan pembiayaan pemasok terhadap liabilitas, arus kas, dan eksposur terhadap risiko likuiditas suatu entitas.

c. Prinsip konsolidasi

Laporan keuangan konsolidasian meliputi laporan keuangan Bank beserta seluruh Entitas Anak yang berada di bawah pengendalian Bank. Entitas Anak adalah entitas (termasuk entitas terstruktur) dimana Bank memiliki pengendalian. Bank mengendalikan entitas lain ketika Bank terekspos atas, atau memiliki hak atas imbal hasil variabel dari keterlibatannya dengan Entitas Anak dan memiliki kemampuan untuk mempengaruhi imbal hasil tersebut melalui kekuasaannya atas Entitas Anak.

Laporan keuangan dari Entitas Anak dimasukkan ke dalam laporan keuangan konsolidasian sejak tanggal pengendalian dimulai sampai dengan tanggal pengendalian berakhir.

Dampak signifikan dari seluruh transaksi dan saldo antara perusahaan-perusahaan yang dikonsolidasikan telah dieliminasi dalam penyajian laporan keuangan konsolidasian, sehingga laporan keuangan konsolidasian hanya mencakup transaksi dan saldo dengan pihak lain.

Kebijakan akuntansi penting yang dipakai dalam penyajian laporan keuangan konsolidasian telah diterapkan secara konsisten oleh Bank, kecuali dinyatakan secara khusus.

Kepentingan nonpengendali disajikan di ekuitas dalam laporan posisi keuangan konsolidasian dan dinyatakan sebesar proporsi pemegang saham nonpengendali atas laba tahun berjalan dan ekuitas Entitas Anak tersebut berdasarkan persentase kepemilikan pemegang saham nonpengendali pada Entitas Anak tersebut.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

b. Change in significant accounting policies (continued)

Amendment of SFAS 207 and SFAS 107 (previously SFAS 2 and SFAS 60): Supplier Finance Arrangements

The amendments to SFAS 207 and SFAS 107 (previously SFAS 2 and SFAS 60) clarify the characteristics of supplier finance arrangements and require additional disclosure of such arrangements. The disclosure requirements in the amendments are intended to assist users of financial statements in understanding the effects of supplier finance arrangements on an entity's liabilities, cash flows and exposure to liquidity risk.

c. Basis of consolidation

The consolidated financial statements include the financial statements of the Bank and its Subsidiaries that are controlled by the Bank. Subsidiaries are all entities (including structured entities) over which the Bank has control. The Bank controls an entity when the Bank is exposed to, or has rights to, variable returns from its involvement with the Subsidiary and has the ability to affect those returns through its power over the Subsidiary.

The financial statements of Subsidiary are included in the consolidated financial statements from the date on which control commences until the date when control ceases.

The significant effects of all transactions and balances between the consolidated companies have been eliminated in preparing the consolidated financial statements, accordingly, the consolidated financial statements include only transactions and balances with other parties.

The significant accounting policies adopted in preparing the consolidated financial statements have been consistently applied by the Bank, unless otherwise stated.

Non-controlling interest is presented as part of equity in the consolidated statements of financial position and represents the non-controlling shareholder's proportionate share in the net income for the year and equity of the Subsidiary based on the percentage of ownership of the non-controlling shareholders in the Subsidiary.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Prinsip konsolidasi (lanjutan)

Dalam hal pengendalian terhadap Entitas Anak dimulai atau diakhiri dalam suatu tahun berjalan, maka hasil usaha Entitas Anak yang diperhitungkan ke dalam laporan keuangan konsolidasian hanya sebatas hasil pada saat pengendalian tersebut mulai diperoleh atau hingga saat pengendalian itu berakhir.

d. Aset dan liabilitas keuangan

(i) Aset keuangan

Sesuai dengan PSAK 109 (dahulu PSAK 71), terdapat tiga klasifikasi pengukuran aset keuangan:

(A) Biaya perolehan diamortisasi;
(B) Diukur pada nilai wajar melalui laba rugi ("FVTPL"); dan
(C) Diukur pada nilai wajar melalui penghasilan komprehensif lain ("FVOCI").

Aset keuangan diklasifikasikan menjadi kategori tersebut di atas berdasarkan model bisnis dimana aset keuangan tersebut dimiliki dan karakteristik arus kas kontraktualnya. Model bisnis merefleksikan bagaimana kelompok aset keuangan dikelola untuk mencapai tujuan bisnis tertentu.

Aset keuangan dapat diukur dengan biaya perolehan diamortisasi hanya jika memenuhi kedua kondisi berikut dan tidak ditetapkan sebagai FVTPL:

- Aset keuangan dikelola dalam model bisnis yang bertujuan untuk memiliki aset keuangan untuk tujuan mendapatkan arus kas kontraktual (*held to collect*); dan
- Kriteria kontraktual dari aset keuangan yang pada tanggal tertentu menghasilkan arus kas yang merupakan pembayaran pokok dan bunga semata ("SPPI") dari jumlah pokok terutang.

Suatu aset keuangan diukur pada FVOCI, hanya jika memenuhi kedua kondisi berikut dan tidak ditetapkan sebagai FVTPL:

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

c. Basis of consolidation (continued)

Where Subsidiary either began or ceased to be controlled during the year, the results of operations of those Subsidiaries are included in the consolidated financial statements only from the date that the control has commenced or up to the date that the control has ceased.

d. Financial assets and liabilities

(i) Financial assets

In accordance with SFAS 109 (previously SFAS 71), there are three measurement classifications for financial assets:

(A) Amortised cost;
(B) Fair value through profit or loss ("FVTPL"); and
(C) Fair value through other comprehensive income ("FVOCI").

Financial assets are classified into these categories based on the business model within which they are held and their contractual cash flow characteristics. The business model reflects how groups of financial assets are managed to achieve a particular business objective.

A financial asset is measured at amortised cost only if it meets both of the following conditions and it is not designated as at FVTPL:

- *The financial assets is held within a business model whose objective is to hold the asset to collect contractual cash flows (held to collect); and*
- *Its contractual terms give rise on specified dates to cash flows that are solely payments of principal and interest ("SPPI") on the principal amount outstanding.*

A financial asset measured at FVOCI only if it meets both of the following conditions and is not designated as at FVTPL:

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(i) Aset keuangan (lanjutan)

- Aset keuangan dikelola dalam model bisnis yang tujuan tercapai dengan mendapatkan arus kas kontraktual dan menjual aset keuangan (*held to collect and sell*); dan
- Kriteria kontraktual dari aset keuangan yang pada tanggal tertentu menghasilkan arus kas yang merupakan pembayaran pokok dan bunga semata dari jumlah pokok terutang.

Seluruh aset keuangan yang tidak diklasifikasikan sebagai diukur dengan biaya perolehan diamortisasi atau FVOCI sebagaimana ketentuan di atas diukur dengan FVTPL.

Aset dapat dijual dari portofolio *held to collect* ketika terdapat peningkatan risiko kredit. Penghentian untuk alasan lain diperbolehkan namun jumlah penjualan tersebut harus tidak signifikan jumlahnya atau tidak sering.

Laba rugi yang belum direalisasi atas aset keuangan yang diklasifikasikan sebagai FVOCI ditangguhkan di pendapatan komprehensif lain sampai aset tersebut dihentikan.

Aset keuangan dapat ditetapkan sebagai FVTPL hanya jika ini dapat mengeliminasi atau mengurangi *accounting mismatch.*

Penilaian apakah arus kas kontraktual hanya merupakan pembayaran pokok dan bunga semata

Untuk tujuan penilaian ini, 'pokok' didefinisikan sebagai nilai wajar dari aset keuangan pada pengakuan awal. 'Bunga' didefinisikan sebagai imbalan untuk nilai waktu atas uang dan untuk risiko kredit yang terkait dengan jumlah pokok yang terutang selama periode waktu tertentu dan untuk risiko dan biaya pinjaman dasar lainnya (misalnya risiko likuiditas dan biaya administrasi), serta marjin keuntungan.

Dalam menilai apakah arus kas kontraktual adalah SPPI, Bank mempertimbangkan ketentuan kontraktual instrumen tersebut.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(i) Financial assets (continued)

- *The financial asset is held within a business model whose objective is achieved by both collecting contractual cash flows and selling the financial asset (held to collect and sell); and*
- *Its contractual terms give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.*

All financial assets not classified as measured at amortised cost or FVOCI as described above are measured at FVTPL.

Assets may be sold out of held to collect portfolios where there is an increase in credit risk. Disposals for other reasons are permitted but such sales should be insignificant in value or infrequent in nature.

Unrealised gains or losses of financial assets held at FVOCI deferred in other comprehensive income until the asset is derecognised.

Financial assets may be designated at FVTPL only if doing so eliminates or reduces accounting mismatch.

Assessment of whether contractual cash flows are solely payments of principal and interest

For the purposes of this assessment, 'principal' is defined as the fair value of the financial asset on initial recognition. 'Interest' is defined as consideration for the time value of money and for the credit risk associated with the principal amount outstanding during a particular period of time and for other basic lending risks and costs (e.g. liquidity risk and administrative costs), as well as profit margin.

In assessing whether the contractual cash flows are SPPI, the Bank considers the contractual terms of the instrument.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(i) Aset keuangan (lanjutan)

Penilaian apakah arus kas kontraktual hanya merupakan pembayaran pokok dan bunga semata (lanjutan)

Hal ini termasuk menilai apakah aset keuangan mengandung ketentuan kontraktual yang dapat mengubah waktu atau jumlah arus kas kontraktual sehingga tidak memenuhi kondisi ini. Dalam melakukan penilaian, Bank mempertimbangkan:

- Kejadian kontinjensi yang akan mengubah jumlah dan waktu arus kas;
- Fitur *leverage;*
- Persyaratan pelunasan dipercepat dan perpanjangan fasilitas;
- Ketentuan yang membatasi klaim Bank atas arus kas dari aset tertentu (seperti pinjaman *non-recourse*); dan
- Fitur yang memodifikasi imbalan dari nilai waktu atas uang (seperti penetapan ulang suku bunga berkala).

Penilaian model bisnis

Model bisnis mengacu pada bagaimana aset keuangan dikelola bersama untuk menghasilkan arus kas untuk Bank. Arus kas mungkin dihasilkan dengan menerima arus kas kontraktual, menjual aset keuangan atau keduanya. Model bisnis ditentukan pada tingkat agregasi di mana kelompok aset dikelola bersama untuk mencapai tujuan tertentu dan tidak bergantung pada niat manajemen pada instrumen individual.

Bank menilai model bisnis pada aset keuangan setidaknya pada tingkat lini bisnis atau pada di mana terdapat variasi mandat/tujuan dalam lini bisnis, pada lini bisnis produk atau pada tingkat *desk* yang lebih *granular* (misalnya sub-portofolio atau sub-lini bisnis).

Penentuan model bisnis dilakukan dengan mempertimbangkan semua bukti relevan yang tersedia pada tanggal penilaian. Ini termasuk, tetapi tidak terbatas pada:

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(i) Financial assets (continued)

Assessment of whether contractual cash flows are solely payments of principal and interest (continued)

This includes assessing whether the financial asset contains a contractual term that could change the timing or amount of contractual cash flows such that it would not meet this condition. In making the assessment, the Bank considers:

- *Contingent events that would change the amount and timing of cash flows;*
- *Leverage features;*
- *Prepayment and extension terms;*
- *Terms that limit the Bank's claim to cash flows from specified assets (e.g. non-recourse loans); and*
- *Features that modify consideration of the time value of money (e.g. periodical reset of interest rates).*

Business model assessment

Business model refers to how financial assets are managed together to generate cash flows for the Bank. This may be collecting contractual cash flows, selling financial assets or both. Business models are determined at a level of aggregation where groups of assets are managed together to achieve a particular objective and do not depend on management's intentions for individual instruments.

The Bank assesses the business model of financial assets at least at business line level or where there are varying mandates or objectives within a business line, at a more granular product business line or desk level (i.e. sub-portfolios or sub-business lines).

Business model determinations are made considering all relevant evidence that is available at the date of the assessment. This includes, but is not limited to:

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(i) Aset keuangan (lanjutan)

Penilaian model bisnis (lanjutan)

- bagaimana kinerja bisnis dan aset keuangan yang ada di dalam unit bisnis itu dievaluasi dan dilaporkan kepada manajemen. Tingkat pemisahan yang diidentifikasi untuk klasifikasi PSAK 109 (dahulu PSAK 71) harus konsisten dengan bagaimana portofolio aset dipisahkan dan dilaporkan kepada manajemen;
- risiko yang mempengaruhi kinerja unit bisnis dan aset keuangan yang dimiliki dalam unit bisnis itu dan khususnya bagaimana risiko itu dikelola; dan
- bagaimana manajer unit bisnis dikompensasi (misalnya, apakah kompensasi didasarkan pada nilai wajar dari aset yang dikelola atau pada arus kas kontraktual yang dikumpulkan).

Penentuan model bisnis dilakukan berdasarkan skenario yang diperkirakan akan terjadi oleh Bank dan tidak dalam kondisi sangat tertekan atau 'kondisi terburuk'. Jika aset dijual dalam kondisi yang tidak diharapkan oleh Bank untuk berlaku ketika aset diakui, klasifikasi aset keuangan yang ada dalam portofolio tidak disajikan secara tidak akurat, tetapi kondisi tersebut harus dipertimbangkan untuk aset yang diperoleh di masa mendatang.

Pemilihan model operasi dalam PSAK 109 (dahulu PSAK 71) dirancang sedemikian rupa sehingga akuntansi untuk instrumen di FVTPL adalah pilihan yang tepat/*conscious*.

Perubahan pada model bisnis atau pengenalan model bisnis baru ditentukan melalui proses persetujuan unit bisnis baru.

Bank dapat mereklasifikasi seluruh aset keuangan yang terpengaruh jika dan hanya jika, model bisnis untuk pengelolaan aset keuangan berubah.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(i) Financial assets (continued)

Business model assessment (continued)

- *how the performance of the business and the financial assets held within that business unit are evaluated and reported to management. The level of segregation identified for SFAS 109 (previously SFAS 71) classification should be consistent with how asset portfolios are segregated and reported to senior management;*
- *the risks that affect the performance of the business unit and the financial assets held within that business unit and in particular the way those risks are managed; and*
- *how managers of the business unit are compensated (for example, whether the compensation is based on the fair value of the assets managed or on the contractual cash flows collected).*

Business model determinations are made on the basis of scenarios that the Bank reasonably expects to occur and not under highly stressed or 'worst case' conditions. Where assets are disposed of under conditions that the Bank did not reasonably expect to prevail when the assets were recognised, the classification of existing financial assets in the portfolio are not rendered inaccurate but the conditions in question should be considered for any assets acquired going forward.

The targeting operating model for SFAS 109 (previously SFAS 71) is designed such that accounting for instruments at FVTPL is a conscious choice.

Changes to business models or the introduction of new business models are determined through the new business unit approval process.

The Bank can reclassified all of its financial assets when and only, its business model for managing those financial assets changes.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(i) Aset keuangan (lanjutan)

Penilaian model bisnis (lanjutan)

Pengakuan

Pembelian dan penjualan aset keuangan diakui pada tanggal perdagangan dimana Bank memiliki komitmen untuk membeli atau menjual aset tersebut.

Pada saat pengakuan awal, aset keuangan diukur pada nilai wajar ditambah/dikurangi (untuk *item* yang tidak diukur pada nilai wajar melalui laba rugi setelah pengakuan awal) biaya transaksi yang dapat diatribusikan secara langsung atas perolehan aset keuangan. Pengukuran aset keuangan setelah pengakuan awal tergantung pada klasifikasi aset keuangan tersebut.

Biaya transaksi hanya meliputi biaya-biaya yang dapat diatribusikan secara langsung untuk perolehan suatu aset keuangan dan merupakan biaya tambahan yang tidak akan terjadi apabila instrumen keuangan tersebut tidak diperoleh.

Aset keuangan yang diukur pada nilai wajar melalui laporan laba rugi pada awalnya dicatat sebesar nilai wajar dan biaya transaksinya dibebankan pada laporan laba rugi.

(ii) Liabilitas keuangan

Liabilitas keuangan diklasifikasikan ke dalam kategori sebagai berikut pada saat pengakuan awal:

- Liabilitas keuangan yang diukur pada nilai wajar melalui laporan laba rugi, yang memiliki 2 (dua) sub-klasifikasi, yaitu liabilitas keuangan yang ditetapkan demikian pada saat pengakuan awal dan liabilitas keuangan yang telah diklasifikasikan dalam kelompok diperdagangkan;
- Liabilitas keuangan lain yang tidak diklasifikasikan sebagai liabilitas keuangan yang diukur pada nilai wajar melalui laba rugi dikategorikan dan diukur dengan biaya perolehan diamortisasi.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(i) Financial assets (continued)

Business model assessment (continued)

Recognition

Purchases and sales of financial assets are recognised on the trade date at which the Bank commits to purchase or sell those assets.

A financial asset is initially measured at fair value plus/less (for an item not subsequently measured at fair value through profit or loss) transaction costs that are directly attributable to the acquisition of a financial asset. The subsequent measurement of financial assets depends on their classification.

Transaction costs include only those costs that are directly attributable to the acquisition of a financial asset are incremental costs that would not have been incurred if the instrument had not been acquired.

Financial assets carried at fair value through profit or loss are initially recognised at fair value and transaction costs are expensed in the profit or loss.

(ii) Financial liabilities

Financial liabilities are classified into the following categories at initial recognition:

- *Financial liabilities at fair value through profit or loss, which has 2 (two) sub-classifications, i.e., those designed as such upon initial recognition and those classified as held for trading;*
- *Other financial liabilities that are not classified as financial liabilities at fair value through profit or loss are categorised and measured at amortised cost.*

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(ii) Liabilitas keuangan (lanjutan)

Pada saat pengakuan awal, liabilitas keuangan diukur pada nilai wajar ditambah (untuk *item* yang tidak diukur pada nilai wajar melalui laba rugi setelah pengakuan awal) biaya transaksi yang dapat diatribusikan secara langsung atas perolehan penerbitan liabilitas keuangan. Pengukuran liabilitas keuangan setelah pengakuan awal tergantung pada klasifikasi liabilitas keuangan tersebut.

Biaya transaksi hanya meliputi biaya-biaya yang dapat diatribusikan secara langsung untuk penerbitan suatu liabilitas keuangan dan merupakan biaya tambahan yang tidak akan terjadi apabila instrumen keuangan tersebut tidak diperoleh atau diterbitkan.

Liabilitas keuangan, biaya transaksi dikurangkan dari jumlah utang yang diakui pada pengakuan awal liabilitas. Biaya transaksi tersebut diamortisasi selama umur instrumen berdasarkan metode suku bunga efektif dan dicatat sebagai bagian dari beban bunga.

Liabilitas keuangan dihentikan pengakuannya jika liabilitas yang ditetapkan dalam kontrak dilepaskan, dibatalkan, atau kadaluarsa.

Jika suatu liabilitas keuangan yang ada digantikan dengan yang lain oleh pemberi pinjaman yang sama pada keadaan yang secara substansial berbeda, atau berdasarkan suatu liabilitas yang ada yang secara substansial telah diubah, maka pertukaran atau modifikasi tersebut diperlakukan sebagai penghentian pengakuan liabilitas awal dan pengakuan liabilitas baru, dan perbedaan nilai tercatat masing-masing diakui dalam laporan laba rugi dan penghasilan komprehensif lain.

(iii) Kontrak modifikasi

Penilaian apakah suatu aset keuangan telah dimodifikasi baik secara substansial maupun tidak substansial dilakukan oleh unit bisnis yang berwenang melakukan modifikasi atau restrukturisasi aset keuangan pada saat unit bisnis tersebut melakukan tindakan modifikasi atau restrukturisasi atas suatu aset keuangan.

Modifikasi aset keuangan dianggap substansial dan Bank akan berhenti mengakui aset keuangan awal ketika:

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(ii) Financial liabilities (continued)

A financial liability is initially measured at fair value plus (for an item not subsequently measured at fair value through profit or loss) transaction costs that are directly attributable to financial liabilities issuance. The subsequent measurement of financial liabilities depends on their classification.

Transaction costs include only those costs that are directly attributable to the issuance of a financial liability and are incremental costs that would not have been incurred if the financial instruments had not been acquired or issued.

Financial liabilities, transaction costs are deducted from the amount of debt initially recognised. Such transactions costs are amortised over the terms of the instruments based on the effective interest rate method and are recorded as part of interest expense.

Financial liabilities are derecognised when the obligation under the liability is discharged, cancelled, or has expired.

Where an existing financial liability is replaced by another from the same lender on substantially different terms, or the terms of an existing liability are substantially modified, such an exchange or modification is treated as derecognition of the original liability and the recognition of a new liability, and the difference in the respective carrying amounts is recognised in the profit or loss and other comprehensive income.

(iii) Contract modification

An assessment of whether a financial asset has been modified substantially or not substantially is carried out by a business unit whose authorised to modify or restructure financial assets, when the business unit performs modification or restructure of a financial asset.

Modifications to financial assets are considered substantial and the Bank will cease to recognise the original financial assets when:

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(iii) Kontrak modifikasi (lanjutan)

(a) aset keuangan (atau bagiannya) berakhir, yaitu jika debitur secara hukum dibebaskan dari tanggung jawab utama atas aset tersebut (atau bagiannya), baik melalui proses hukum maupun oleh kreditur pembuatan kontrak kredit baru (sebagai contoh, opsi *equity conversion*); atau
(b) terdapat konversi mata uang.

Bank kemudian akan mengukur aset keuangan yang telah dimodifikasi baik secara substansial maupun tidak substansial dengan cara berikut:

(a) Modifikasi Aset Keuangan yang Substansial

1) Saat arus kas kontraktual atas aset keuangan direnegosiasi atau dimodifikasi (antara lain ketika kredit direstrukturisasi) dimana renegosiasi atau modifikasi tersebut menghasilkan penghentian pengakuan aset keuangan, Bank akan mencatat aset keuangan tersebut sebagai aset keuangan baru/ modifikasian pada tanggal modifikasi/ negosiasi.
2) 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 MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(iii) Contract modification (continued)

(a) the financial asset (or portion thereof) expires, that is, if the debtor is legally released from primary responsibility for the asset (or any portion thereof), either by legal process or by the creditor entering into a new credit contract (for example, the equity conversion option); or
(b) there is a currency conversion.

The Bank will measure the substantially and not substantially modified financial assets as follows:

(a) Substantial Modification of Financial Assets

1) When the contractual cashflow on a financial asset is renegotiated or modified (including when a credit is restructured) and the renegotiation or modification results in derecognition of the financial asset, therefore the Bank will record the financial asset as a new/ modified financial asset on the modification/ negotiation date.
2) The difference between the gross amount of the initial financial assets and the fair value of the modified assets recorded as profit or loss.
3) Transaction income or costs incurred in connection with a modification event recognised as part of gain or loss on the modification.
4) Next, Bank assess whether new/modified financial assets are assets originating from impaired financial assets.
5) Recognition of interest income on assets originating from financial assets is calculated based on an effective interest rate adjusted for credit risk (risk-adjusted effective interest rate) to discount the cash flows of modified financial assets.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(iii) Kontrak Modifikasi (lanjutan)

(b) Modifikasi Aset Keuangan yang Tidak Substantial

1. Saat Bank melakukan renegosiasi atau modifikasi arus kas kontraktual atas aset keuangan (antara lain ketika kredit direstrukturisasi) yang tidak memenuhi kriteria modifikasi aset keuangan yang substansial di atas, maka renegosiasi atau modifikasi tersebut tidak menghasilkan penghentian pengakuan aset keuangan.
2. Jumlah tercatat bruto aset keuangan dihitung sebesar nilai kini (*net present value*) dari arus kas kontraktual yang telah dimodifikasi atau direnegosiasi yang didiskontokan menggunakan suku bunga efektif awal.
3. 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.

(iv) Penentuan nilai wajar

Nilai wajar adalah harga yang akan diterima untuk menjual suatu aset atau harga yang akan dibayar untuk mengalihkan suatu liabilitas dalam transaksi teratur (*orderly transaction*) antara pelaku pasar (*market participants*) pada tanggal pengukuran di pasar utama atau, jika tidak terdapat pasar utama, di pasar yang paling menguntungkan dimana Bank memiliki akses pada tanggal tersebut. Nilai wajar liabilitas mencerminkan risiko wanprestasinya.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(iii) Contract Modification (continued)

(b) Non-Substantial Modification of Financial Assets

1. When the Bank renegotiates or modifies contractual cash flows of financial assets (including when loans are restructured) that do not meet the criteria for substantial modification of financial assets above, the renegotiation or modification does not result in derecognition of the financial assets.
2. The gross carrying amount of financial assets is computed at the net present value of modified or renegotiated contractual cash flows, discounted at the original effective interest rate.
3. Bank then recognises 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 recognised as an adjustment to the carrying amount of the modified financial asset and amortised over the remaining term of the modified financial asset.

(iv) Determination of fair value

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date in the principal market or, in its absence, the most advantageous market to which the Bank has access at that date. The fair value of a liability reflects its non-performance risk.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(iv) Penentuan nilai wajar (lanjutan)

Jika tersedia, Bank mengukur nilai wajar instrumen keuangan dengan menggunakan harga kuotasian di pasar aktif untuk instrumen tersebut.

Instrumen keuangan dianggap memiliki kuotasi di pasar aktif jika harga kuotasi tersedia sewaktu-waktu dan dapat diperoleh secara rutin dari bursa, pedagang efek (*dealer*), perantara efek (*broker*), kelompok industri, badan pengawas (*pricing service* atau *regulatory agency*), dan harga tersebut mencerminkan transaksi pasar yang aktual dan rutin dalam suatu transaksi yang wajar. Jika kriteria di atas tidak terpenuhi, maka pasar aktif dinyatakan tidak tersedia. Indikasi-indikasi dari pasar tidak aktif adalah terdapat selisih yang besar antara harga penawaran dan permintaan atau kenaikan signifikan dalam selisih harga penawaran dan permintaan dan hanya terdapat beberapa transaksi terkini.

Bukti terbaik atas nilai wajar instrumen keuangan pada saat pengakuan awal adalah harga transaksi, yaitu nilai wajar dari pembayaran yang diberikan atau diterima. Jika Bank menetapkan bahwa nilai wajar pada pengakuan awal berbeda dengan harga transaksi dan nilai wajar tidak dapat dibuktikan dengan harga kuotasian di pasar aktif untuk aset atau liabilitas yang sejenis atau berdasarkan teknik penilaian yang hanya menggunakan data dari pasar yang dapat diobservasi, maka nilai wajar instrumen keuangan pada saat pengakuan awal disesuaikan untuk menangguhkan perbedaan antara nilai wajar pada saat pengakuan awal dan harga transaksi. Setelah pengakuan awal, perbedaan tersebut diamortisasi dan diakui dalam laba rugi sepanjang umur dari instrumen tersebut.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(iv) Determination of fair value (continued)

When available, the Bank measures the fair value of a financial instrument using the quoted price in an active market for that instrument.

A financial instrument is regarded as quoted in an active market if quoted prices are readily and regularly available from an exchange, dealer, broker, industry group, pricing service or regulatory agency, and those prices represent actual and regularly occurring market transactions on an arm's length basis. If the above criteria are not met, the market is regarded as being inactive. Indications that a market is inactive are when there is a wide bid-offer spread or significant increase in the bid-offer spread or there are few recent transactions.

The best evidence of the fair value of a financial instrument at initial recognition is normally the transaction price, i.e., the fair value of the consideration given or received. If the Bank determines that the fair value at initial recognition differs from the transaction price and the fair value is evidenced neither by a quoted price in an active market for an identical asset or liability nor based on a valuation technique that uses only data from observable markets, then the financial instrument is initially measured at fair value, adjusted to defer the difference between the fair value at initial recognition and the transaction price. Subsequently, that difference is amortised and recognised in profit or loss on over the life of the instrument.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(iv) Penentuan nilai wajar (lanjutan)

Untuk instrumen keuangan yang tidak mempunyai harga pasar, estimasi atas nilai wajar ditetapkan dengan mengacu pada nilai wajar instrumen lain yang substansinya sama atau dihitung berdasarkan arus kas yang diharapkan terhadap aset bersih efek-efek tersebut. Untuk penyertaan saham yang nilai wajarnya tidak tersedia, estimasi atas nilai wajar dinyatakan sebesar biaya perolehan.

Nilai wajar untuk semua instrumen keuangan lainnya ditentukan dengan menggunakan teknik penilaian. Dengan teknik ini, nilai wajar merupakan suatu estimasi yang dihasilkan dari data yang dapat diobservasi dari instrumen keuangan yang sama, menggunakan model-model untuk mendapatkan estimasi nilai kini dari arus kas masa depan yang diharapkan atau teknik penilaian lainnya menggunakan input (sebagai contoh nilai tukar mata uang asing, volatilitas, dan *counterparty spreads*) yang tersedia pada tanggal laporan posisi keuangan.

(v) Penentuan biaya perolehan diamortisasi

Biaya perolehan diamortisasi dari aset keuangan atau liabilitas keuangan adalah jumlah aset atau liabilitas keuangan yang diukur pada saat pengakuan awal, dikurangi pembayaran pokok, ditambah atau dikurangi dengan amortisasi kumulatif dengan menggunakan metode suku bunga efektif yang dihitung dari selisih antara nilai awal dan nilai jatuh temponya dan dikurangi cadangan kerugian penurunan nilai.

Kerugian penurunan nilai dilaporkan sebagai pengurang dari nilai tercatat dari aset keuangan dalam kelompok biaya perolehan diamortisasi, dan diakui di dalam laporan laba rugi sebagai "Kerugian penurunan nilai aset keuangan".

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(iv) Determination of fair value (continued)

For financial instruments with no quoted market price, a reasonable estimate of the fair value is determined by reference to the current market value of another instrument which substantially have the same characteristic or calculated based on the expected cash flows of the underlying net asset base of the marketable securities. For the investment in shares do not have readily determinable fair values, the estimated fair value recognised as at acquisition cost.

For all other financial instruments, fair value is determined using valuation techniques. In these techniques, fair values are estimated from observable data in respect of similar financial instruments, using models to estimate the present value of expected future cash flows or other valuation techniques, using inputs (for example, foreign exchange rates, volatilities and counterparty spreads) existing at the dates of the statement of financial position.

(v) Determination of amortised cost

The amortised cost of a financial asset or financial liability is the amount at which the financial asset or liability is measured at initial recognition, less principal repayments, plus or less the cumulative amortisation using the effective interest method of any difference between the initial amount recognised and the maturity amount and minus any allowance for impairment losses.

The impairment loss is reported as a deduction from the carrying value of the financial assets classified as amortised cost and recognised in the statement of profit or loss as "Impairment losses on financial assets".

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(v) Penentuan biaya perolehan diamortisasi (lanjutan)

Tingkat suku bunga efektif adalah suku bunga yang secara tepat mendiskontokan estimasi arus kas di masa datang selama perkiraan umur dari aset keuangan atau liabilitas keuangan (atau jika lebih tepat, digunakan periode yang lebih singkat) untuk memperoleh nilai tercatat bersih pada saat pengakuan awal. Pada saat menghitung tingkat suku bunga efektif, Bank mengestimasi arus kas di masa datang dengan mempertimbangkan seluruh persyaratan kontraktual dalam instrumen keuangan tersebut, namun tidak mempertimbangkan kerugian kredit di masa mendatang.

Perhitungan suku bunga efektif mencakup biaya transaksi dan seluruh imbalan/provisi dan bentuk lain yang dibayarkan atau diterima yang merupakan bagian tak terpisahkan dari suku bunga efektif.

(vi) Penghentian pengakuan

Dalam transaksi dimana Bank secara substansial tidak memiliki atau tidak mentransfer seluruh risiko dan manfaat atas kepemilikan aset keuangan, Bank menghentikan pengakuan aset tersebut jika Bank tidak lagi memiliki pengendalian atas aset tersebut. Hak dan kewajiban yang masih dimiliki dalam transfer tersebut diakui secara terpisah sebagai aset atau liabilitas. Dalam transfer dimana pengendalian atas aset masih dimiliki, Bank tetap mengakui aset yang ditransfer tersebut sebesar keterlibatan berkelanjutan, dimana tingkat keberlanjutan Bank dalam aset yang ditransfer adalah sebesar perubahan nilai aset yang ditransfer.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(v) Determination of amortised cost (continued)

The effective interest rate is the rate that exactly discounts the estimated future cash flows through the expected life of the financial asset or financial liability (or, where appropriate, a shorter period) to the net carrying amount at initial recognition. When calculating the effective interest rate, the Bank estimates future cash flows considering all contractual terms of the financial instrument, but does not consider any future credit losses.

The calculation of the effective interest rate includes transaction costs and all fees and provisions paid or received that are an integral part of the effective interest rate.

(vi) Derecognition

In transactions in which the Bank neither retains nor transfers substantially all the risks and rewards of ownership of a financial asset, the Bank derecognises the asset if it does not retain control over the asset. The rights and obligations retained in the transfer are recognised separately as assets and liabilities as appropriate. In transfers in which control over the asset is retained, the Bank continues to recognise the asset to the extent of its continuing involvement, determined by the extent to which it is exposed to changes in the value of the transferred asset.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(vi) Penghentian pengakuan (lanjutan)

Bank menghapusbukukan aset keuangan dan cadangan kerugian penurunan nilai terkait, pada saat Bank menentukan bahwa aset keuangan tersebut tidak dapat ditagih seluruhnya. Keputusan ini diambil setelah mempertimbangkan informasi seperti telah terjadinya perubahan signifikan pada posisi keuangan debitur/penerbit aset keuangan sehingga debitur/penerbit aset keuangan tidak lagi dapat melunasi kewajibannya, atau hasil penjualan agunan tidak akan cukup untuk melunasi seluruh eksposur pinjaman yang diberikan.

e. Saling hapus

Aset keuangan dan liabilitas keuangan disalinghapuskan dan nilai bersihnya dilaporkan pada laporan posisi keuangan jika, dan hanya jika Bank memiliki hak yang berkekuatan hukum untuk melakukan saling hapus atas jumlah yang telah diakui tersebut dan adanya maksud untuk menyelesaikan liabilitas secara bersamaan.

Hak saling hapus tidak kontinjen atas peristiwa di masa depan dan dapat dipaksakan secara hukum di dalam situasi bisnis yang normal, dan dalam peristiwa gagal bayar atau kebangkrutan dari Bank atau pihak lawan.

Pendapatan dan beban disajikan dalam jumlah bersih hanya jika diperkenankan oleh standar akuntansi.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(vi) Derecognition (continued)

The Bank write off a financial asset and any related allowance for impairment losses, when the Bank determines that the financial asset is completely uncollectible. This determination is reached after considering information such as the occurrence of significant changes in the financial position of debtor/financial asset's issuer such that the debtor/financial asset's issuer can no longer pay the obligation, or that proceeds from collateral will not be sufficient to pay back the entire exposure.

e. Offsetting

Financial assets and liabilities are offset and the net amount is reported in the statements of financial position if only the Bank has a legal right to offset the recognised amounts and there is an intention to settle on net basis, or realise the asset and settle the liability simultaneously.

The legally enforceable right must not be contingent on future events and must be enforceable in the normal course of business and in the event of default, insolvency or bankruptcy of the Bank or the counterparty.

Income and expenses are presented on a net basis only when permitted by the accounting standards.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

f. Klasifikasi dan Reklasifikasi instrumen keuangan

Klasifikasi aset dan liabilitas keuangan

Bank mengklasifikasikan instrumen keuangan ke dalam klasifikasi tertentu yang mencerminkan sifat dari informasi dan mempertimbangkan karakteristik dari instrumen keuangan tersebut. Klasifikasi ini dapat dilihat pada tabel berikut:

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

f. Classification and reclassification of financial instruments

Classification of financial assets and liabilities

The Bank classifies the financial instruments into classes that reflects the nature of information and take into account the characteristic of those financial instruments. The classification can be seen in the table below:

Kategori yang didefinisikan oleh PSAK 109 (dahulu PSAK 71) / *Category as defined by SFAS 109 (previously SFAS 71)*		**Golongan (ditentukan oleh Bank)/ *Classes (as determined by the Bank)***
Aset keuangan/ *Financial assets*	Biaya perolehan diamortisasi/*Amortised cost*	Kas/*Cash*
		Giro pada Bank Indonesia/*Current accounts with Bank Indonesia*
		Giro pada bank lain/*Current accounts with other banks*
		Penempatan pada Bank Indonesia dan bank lain/ *Placements with Bank Indonesia and other banks*
		Efek-efek/*Marketable securities*
		Tagihan akseptasi/*Acceptance receivables*
		Pinjaman yang diberikan/ *Loans*
		Efek-efek yang dibeli dengan janji dijual kembali/*Securities purchased under resale agreements*
		Pendapatan bunga yang masih akan diterima/*Interest income receivables*
		Aset lain-lain/*Other assets*
	Aset keuangan yang diukur pada nilai wajar melalui laba rugi/*Financial assets measured at fair value through profit or loss*	Efek-efek/*Marketable securities*
		Penyertaan saham/*Investments in shares*
	Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain/*Financial assets measured at fair value through other comprehensive income*	Efek-efek/*Marketable securities*
		Penyertaan saham/*Investments in shares*
Liabilitas keuangan/ *Financial liabilities*	Liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi/*Financial liabilities at amortised cost*	Simpanan nasabah/*Deposits from customers*
		Simpanan dari bank lain/*Deposits from other banks*
		Efek-efek yang dijual dengan janji dibeli kembali/*Securities sold under repurchase agreement*
		Efek-efek yang diterbitkan/*Securities issued*
		Utang akseptasi/*Acceptance payables*
		Akrual dan liabilitas lain-lain/*Accruals and other liabilities*
Komitmen dan kontinjensi/ *Commitment and contingency*	Fasilitas pinjaman yang belum digunakan/*Unused loan facilities*	
	Garansi yang diterbitkan/*Guarantees issued*	

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

f. Klasifikasi dan Reklasifikasi instrumen keuangan (lanjutan)

Reklasifikasi aset keuangan

Bank diperkenankan untuk melakukan reklasifikasi atas aset keuangan yang dimiliki jika Bank mengubah model bisnis untuk pengelolaan aset keuangan.

Perubahan model bisnis sifatnya harus berdampak secara signifikan terhadap kegiatan operasional Bank seperti memperoleh, melepaskan, atau mengakhiri suatu lini bisnis. Selain itu, Bank perlu membuktikan adanya perubahan tersebut kepada pihak eksternal.

Bank akan mereklasifikasi seluruh aset keuangan yang terkena dampak dari perubahan model bisnis. Perubahan tujuan model bisnis Bank harus berdampak sebelum tanggal reklasifikasi.

Yang bukan merupakan perubahan model bisnis adalah:

a. perubahan intensi berkaitan dengan aset keuangan tertentu (bahkan dalam situasi perubahan signifikan dalam kondisi pasar);
b. hilangnya sementara pasar tertentu untuk aset keuangan; dan
c. pengalihan aset keuangan antara bagian dari Bank dengan model bisnis berbeda.

Dampak Reklasifikasi Aset Keuangan

Dampak reklasifikasi aset keuangan pada laba rugi atau ekuitas dan pengukuran awalnya adalah sebagai berikut:

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

f. Classification and reclassification of financial instruments (continued)

Reclassification of financial assets

The Bank can reclassify its all of its financial assets when and only, its business model for managing those financial assets changes.

The characteristic of business model changes must significantly impact to the Bank operational activities such as collecting, disposing or terminating a business line. In addition, the Bank has to prove the changes to external parties.

The Bank will reclassify all financial assets impacted by business model changes. Changes of the objective of the Bank's business model must be impacted before reclassification date.

The following lists are not changes in business model:

a. changes in intention in relation with certain financial asset (even in situations of significant changes in market conditions);
b. temporary loss of certain markets for financial assets; and
c. transfer of financial asset between Bank with different business model.

Impact of Reclassificaton of Financial Assets

The impact of reclassification of financial asset on profit or loss or equity and its initial measurement is as follows:

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

f. Klasifikasi dan Reklasifikasi Instrumen keuangan (lanjutan)

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

f. Classification and Reclassification of Financial Instruments (continued)

Reklasifikasi/ *Reclassification*		**Dampak Terhadap Laba Rugi/ *Impact on profit or loss***	**Dampak Terhadap Ekuitas/ *Impact on equity***	**Nilai Tercatat Awal Setelah Reklasifikasi/ *Initial Carrying Value After Reclassification***
Dari/ *From*	**Ke/ *To***			
FVTPL	*Amortised Cost*	-	-	1. Nilai wajar pada tanggal reklasifikasi menjadi jumlah tercatat bruto yang baru/ *Fair value at the reclassification date becomes its new gross carrying amount.* 2. Suku bunga efektif ditentukan pada dasar nilai wajar aset pada tanggal reklasifikasi/ *Effective interest rate is determined at the fair value of the asset at reclassification date.*
	FVOCI	-	-	1. Aset keuangan tetap diukur pada nilai wajarnya/ *Financial assets is measured at fair value.* 2. Suku bunga efektif ditentukan pada dasar nilai wajar aset pada tanggal reklasifikasi/ *Effective interest rate is determined at the fair value of the asset at reclassification date.*
Amortised Cost	FVTPL	Selisih antara nilai tercatat sebelum reklasifikasi dan nilai wajar setelah reklasifikasi/ *Difference in carrying amount before reclassification and fair value after reclassification*	-	Nilai wajarnya diukur pada tanggal reklasifikasi/ *Fair value is measured at reclassification date.*
	FVOCI	-	Selisih antara nilai tercatat sebelum reklasifikasi dan nilai wajar setelah reklasifikasi/ *Difference in carrying amount before reclassification and fair value after reclassification*	1. Nilai wajarnya diukur pada tanggal reklasifikasi/ *Fair value is measured at reclassification date.* 2. Suku bunga efektif dan pengukuran kerugian kredit ekspektasian tidak perlu disesuaikan/ *Effective interest rate and expected credit loss is not adjusted.*
FVOCI	*Amortised Cost*	-	Keuntungan atau kerugian kumulatif dihapus dari ekuitas dan disesuaikan terhadap nilai wajar/ *Cumulative gain or loss on OCI is adjusted against the fair value of the financial asset*	1. Nilai wajar pada tanggal reklasifikasi menjadi jumlah tercatat bruto yang baru ditambah atau dikurangi keuntungan atau kerugian kumulatif sebelumnya/ *Fair value at the reclassification date becomes its new gross carrying amount by added or deducted the previous cumulative gain or loss.* 2. Suku bunga efektif dan pengukuran kerugian kredit ekspektasian tidak perlu disesuaikan/ *Effective interest rate and expected credit loss is not adjusted.*
	FVOCI	Keuntungan atau kerugian kumulatif direklasifikasi dari ekuitas menjadi laba rugi/ *Cumulative gain or loss on OCI is reclassified to profit or loss*		Aset keuangan tetap diukur pada nilai wajarnya/ *Financial assets is measured at fair value*

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

g. Penurunan nilai dari aset keuangan

Bank menilai dengan dasar perkiraan masa yang akan datang kerugian kredit ekspektasian (*Expected Credit Loss*/"ECL") terkait dengan instrumen aset keuangan yang dicatat pada biaya perolehan diamortisasi dan nilai wajar melalui penghasilan komprehensif lain. Metodologi penurunan nilai yang ditampilkan tergantung kepada apakah tidak terjadi peningkatan risiko kredit yang signifikan untuk aset keuangan yang diukur pada biaya perolehan diamortisasi dan diukur pada nilai wajar melalui penghasilan komprehensif lain (FVOCI). Jika pada tanggal pelaporan, risiko kredit atas aset keuangan tidak meningkat secara signifikan sejak pengakuan awal, maka Bank akan mengukur penyisihan kerugian untuk aset keuangan tersebut sejumlah ECL 12 bulan. Jika risiko kredit atas aset keuangan telah meningkat secara signifikan dari pengakuan awal, maka Bank akan menyajikan penyisihan kerugian sejumlah ECL *lifetime*.

ECL 12 bulan dan ECL *lifetime*

ECL 12 bulan adalah bagian dari kerugian kredit ekspektasian sepanjang umurnya yang merepresentasikan ECL yang timbul dari peristiwa gagal bayar aset keuangan yang mungkin terjadi dalam 12 bulan setelah tanggal pelaporan (atau periode yang lebih pendek jika umur aset keuangan yang diharapkan kurang dari 12 bulan). ECL 12 bulan dibobot oleh probabilitas terjadinya *default* dimaksud.

ECL *lifetime* adalah kerugian yang diakibatkan dari semua kejadian default yang mungkin terjadi selama perkiraan waktu umur hidup aset keuangan.

Staging Criteria

Aset keuangan harus dialokasikan ke salah satu dari tiga tahap penurunan nilai (*stage* 1, *stage* 2, *stage* 3) dengan menentukan apakah terjadi peningkatan risiko kredit yang signifikan atas aset keuangan sejak pengakuan awal atau apakah fasilitas tersebut gagal bayar pada setiap tanggal pelaporan.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

g. Impairment of financial assets

The Bank assesses on a forward-looking basis the expected credit loss associated with its financial assets instruments carried at amortised cost and fair value at other comprehensive income. The impairment methodology applied depends on whether there has been a significant increase in credit risk to financial asset measured at amortised cost and at fair value through other comprehensive income (FVOCI). If at the reporting date, credit risk on financial asset has not increased significantly since initial recognition, the Bank shall measure the allowance for losses for that financial asset at the amount of 12 (twelve) months expected losses. If the credit risk on that financial asset has increased significantly since initial recognition, the Bank shall measure the allowance for losses at the amount of expected credit losses over its lifetime.

12-month ECL and Lifetime ECL

12-month ECL is the portion of ECL that result from default events that are possible within the 12-months after reporting date (or the shorter period if expected life of financial asset is less than 12 months). 12-month ECL is weighted by probability of default.

Lifetime ECL is the ECL that result from all possible default events over the expected life of financial asset.

Staging Criteria

Financial asset must be allocated to one of three stages of impairment (stage 1, stage 2, stage 3) by determining whether there is a significant increase in credit risk on the financial asset since initial recognition or whether the facility has defaulted on each reporting date.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

g. Penurunan nilai dari aset keuangan (lanjutan)

Stage 1: ECL diakui pada saat pengakuan awal instrumen keuangan dan merepresentasikan kekurangan kas sepanjang umur aset yang timbul dari kemungkinan gagal bayar di masa yang akan datang dalam kurun waktu dua belas bulan sejak tanggal pelaporan. ECL terus ditentukan oleh dasar ini sampai timbul peningkatan risiko kredit yang signifikan pada instrumen tersebut atau instrumen tersebut telah mengalami penurunan nilai kredit. Jika suatu instrumen tidak lagi dianggap menunjukkan peningkatan risiko kredit yang signifikan, maka ECL dihitung kembali berdasarkan basis dua belas bulan.

Stage 2: mencakup aset keuangan yang mengalami peningkatan signifikan atas risiko kredit ("SICR") sejak pengakuan awal (kecuali jika memiliki risiko kredit rendah pada tanggal pelaporan), namun tidak memiliki bukti penurunan nilai yang objektif. Untuk aset ini, ECL *lifetime* dihitung. ECL *lifetime* adalah kerugian pinjaman yang diharapkan yang dihasilkan dari semua kejadian *default* yang mungkin terjadi selama perkiraan umur dari aset keuangan.

Bank menggunakan berbagai pengukuran kualitatif dan kuantitatif dalam menilai SICR seperti berikut:

Pinjaman yang diberikan

a. Kriteria kuantitatif
Akun-akun dengan 30 hari tunggakan ("DPD") dianggap telah mengalami peningkatan risiko kredit yang signifikan.

b. Kriteria kualitatif
Debitur dengan DPD kurang dari 30 hari yang telah direstrukturisasi (kecuali debitur restrukturisasi akibat dampak pandemi COVID-19) dianggap memiliki kenaikan signifikan atas risiko kredit.

Stage 3: Aset hanya akan dianggap mengalami penurunan nilai dan kerugian kredit ekspektasian sepanjang umurnya diakui, jika terdapat bukti objektif penurunan nilai yang dapat diobservasi. Faktor-faktor yang diobservasi ini serupa dengan indikator bukti

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

g. Impairment of financial assets (continued)

Stage 1: ECL are recognised at the time of initial recognition of a financial instrument and represent the lifetime cash shortfalls arising from possible default events up to twelve months into the future from the reporting date. ECL continue to be determined on this basis until there is either a significant increase in the credit risk of an instrument or the instrument becomes credit-impaired. If an instrument is no longer considered to exhibit a significant increase in credit risk, ECL will revert to being determined on a 12-month basis.

Stage 2: includes financial assets that experience a significant increase in credit risk ("SICR") since initial recognition (unless having low credit risk at the reporting date), but do not have objective evidence of impairment. For these assets, Lifetime ECL will be calculated. Lifetime ECL are the ECL that results from all possible default events over the expected life of financial asset.

The Bank uses a number of qualitative and quantitative measures in assessing SICR as follows:

Loans

a. Quantitative criteria
Accounts that are 30 days past due ("DPD") are considered to have experienced a significant increase in credit risk.

b. Qualitative criteria
Debtors with DPD less than 30 days which have been restructured (except for restructured debtors as a result of the COVID-19 pandemic) which is considered to have a significant increase in credit risk.

Stage 3: An asset is only considered credit impaired and lifetime expected credit losses recognised, if there is observed objective evidence of impairment. These factors are similar to the indicators of objective evidence of impairment under SFAS 109 (previously SFAS 71), this includes,

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

g. Penurunan nilai dari aset keuangan (lanjutan)

objektif penurunan nilai pada PSAK 109 (dahulu PSAK 71), termasuk antara lain aset gagal bayar atau mengalami kesulitan keuangan yang signifikan atau mengalami *forbearance* atas kredit yang mengalami penurunan nilai (disebut sebagai 'aset *Stage* 3'). Pengukuran kerugian kredit ekspektasian di seluruh tahapan aset diperlukan untuk mencerminkan jumlah yang tidak bias dan rata-rata probabilitas tertimbang yang ditentukan dengan mengevaluasi serangkaian kemungkinan yang dapat terjadi menggunakan informasi yang wajar dan dapat didukung dengan peristiwa di masa lampau, kondisi saat ini dan proyeksi terkait dengan kondisi ekonomis di masa depan.

Aset keuangan yang mengalami penurunan nilai (atau gagal bayar) merupakan aset yang setidaknya telah memiliki tunggakan lebih dari 90 hari atas pokok dan/atau bunga atau memiliki peringkat kredit tertentu (*default*). Aset keuangan juga dianggap mengalami penurunan nilai kredit dimana debitur kemungkinan besar tidak akan membayar dengan terjadinya satu atau lebih kejadian yang teramati yang memiliki dampak menurunkan jumlah estimasi arus kas masa depan dari aset keuangan tersebut. Cadangan kerugian penurunan nilai terhadap aset keuangan yang mengalami penurunan nilai ditentukan berdasarkan penilaian terhadap arus kas yang dapat dipulihkan berdasarkan sejumlah skenario, termasuk realisasi jaminan yang dimiliki jika memungkinkan. ECL akan mencerminkan rata-rata tertimbang dari skenario berdasarkan probabilitas dari skenario yang relevan untuk terjadi. Cadangan kerugian penurunan nilai merupakan selisih antara nilai sekarang dari arus kas yang diperkirakan akan dipulihkan, didiskontokan pada suku bunga efektif awal, dan nilai tercatat bruto instrumen sebelum penurunan nilai kredit.

Periode yang diperhitungkan ketika mengukur kerugian kredit ekspektasian adalah periode kontrak aset keuangan. Umur ekspektasian dapat dipengaruhi oleh pembayaran dimuka dan periode kontrak maksimum melalui opsi perpanjangan kontrak. Untuk portofolio *revolving* tertentu, umur ekspektasian dinilai sepanjang periode dimana Bank terekspos dengan risiko kredit (berdasarkan durasi waktu yang dibutuhkan untuk fasilitas kredit ditarik).

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

g. Impairment of financial assets (continued)

amongst other factors, assets in default or experiencing significant financial difficulty, or experiencing forbearance on impaired credit (mentioned as 'Stage 3 asset'). The measurement of expected credit losses across all stages is required to reflect an unbiased and probability weighted amount that is determined by evaluating a range of reasonably possible outcomes using reasonable and supportable information about past events, current conditions and forecasts of future economic conditions.

Financial assets that are credit impaired (or in default) represent those that are at least 90 days past due in respect of principal and/or interest or has certain credit grades (default). Financial assets are also considered to be credit impaired where the debtors are unlikely to pay on the occurrence of one or more observable events that have a detrimental impact on the estimated future cash flows of the financial asset. Loss provisions against credit impaired financial assets are determined based on an assessment of the recoverable cash flows under a range of scenarios, including the realisation of any collateral held where appropriate. The ECL will reflect weighted average of the scenarios based on the probability of the relevant scenario to occur. The loss provisions held represent the difference between the present value of the cash flows expected to be recovered, discounted at the instrument's original effective interest rate, and the gross carrying value of the instrument prior to any credit impairment.

The period considered when measuring expected credit loss is the contractual term of the financial asset. The expected life may be impacted by prepayments and the maximum contractual term by extension options. For certain revolving portfolios, the expected life is assessed over the period that the Bank is exposed to credit risk (which is based on the length of time it takes for credit facilities to be withdrawn).

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

g. Penurunan nilai dari aset keuangan (lanjutan)

Untuk aset yang diukur pada biaya perolehan diamortisasi, saldo di neraca mencerminkan aset bruto dikurangi kerugian kredit ekspektasian. Untuk instrumen utang dalam kategori FVOCI, saldo di neraca mencerminkan nilai wajar dari instrumen dikurangi dengan cadangan kerugian kredit ekspektasian.

Untuk menentukan kerugian kredit ekspektasian komponen-komponen ini akan diperhitungkan secara bersama-sama dan didiskontokan ke tanggal laporan keuangan menggunakan diskonto berdasarkan suku bunga efektif.

PSAK 109 (dahulu PSAK 71) mensyaratkan penyertaan informasi tentang kejadian masa lalu, kondisi saat ini dan perkiraan kondisi ekonomi masa depan. Perkiraan perubahan dalam kerugian pinjaman yang diharapkan harus mencerminkan dan secara langsung konsisten dengan perubahan dalam data terkait yang diobservasi dari periode ke periode. Perhitungan ECL ini membutuhkan estimasi *forward-looking* dari *Probability of Default* (PD), *Loss Given Default* (LGD) dan *Exposure At Default* (EAD).

Untuk komitmen pinjaman dan kontrak jaminan keuangan, tanggal pada saat Bank menjadi pihak dalam suatu komitmen yang tidak dapat dibatalkan merupakan tanggal pengakuan awal untuk keperluan penerapan persyaratan penurunan nilai.

a. *Probability of Default* ("PD")

Probabilitas yang timbul di suatu waktu dimana debitur mengalami gagal bayar, dikalibrasikan sampai dengan periode 12 bulan dari tanggal laporan (*Stage* 1) atau sepanjang umur (*Stage* 2 dan 3) dan digabungkan pada dampak asumsi ekonomi masa depan yang memiliki risiko kredit. PD diestimasikan pada *point in time* dimana hal ini berfluktuasi sejalan dengan siklus ekonomi.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

g. Impairment of financial assets (continued)

For assets measured at amortised cost, the balance sheet amount reflects the gross asset less the expected credit losses. For debt instruments held at FVOCI, the balance sheet amount reflects the instrument's fair value less the expected credit losses.

To determine the expected credit loss, these components are multiplied together and discounted to the balance sheet date using the effective interest rate as the discount rate.

SFAS 109 (previously SFAS 71) requires supportable information about past events, current condition and forecasts of future economic conditions. Estimated movement on expected credit losses have to be reflected and directly consistent with changes in observed related data over the period. This ECL calculation needs forward-looking estimation from Probability of Default (PD), Loss Given Default (LGD) and Exposure At Default (EAD).

For loan commitments and financial guarantee contracts, the date when the Bank become a party in a irrevocable commitment is the date of initial recognition for implementation of impairment purposes.

a. Probability of Default ("PD")

The probability at a point in time that a counterparty will default, calibrated over up to 12 months from the reporting date (Stage 1) or over the lifetime of the product (Stage 2 and 3) and incorporating the impact of forward-looking economic assumptions that have an effect on credit risk. PD is estimated at a point in time that means it will fluctuate in line with the economic cycle.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

g. Penurunan nilai dari aset keuangan (lanjutan)

b. *Loss Given Default ("LGD")*

Kerugian yang diperkirakan akan timbul dari debitur yang mengalami gagal bayar dengan menggabungkan dampak dari asumsi ekonomi masa depan yang relevan (jika ada) dimana hal ini mewakili perbedaan antara arus kas kontraktual yang akan jatuh tempo dengan arus kas yang diharapkan untuk diterima. Bank mengestimasikan LGD berdasarkan data historis dari tingkat pemulihan dan memperhitungkan pemulihan yang berasal dari jaminan terhadap aset keuangan dengan mempertimbangkan asumsi ekonomi di masa depan jika relevan.

c. *Exposure at Default ("EAD")*

Perkiraan nilai eksposur neraca pada saat gagal bayar dengan mempertimbangkan bahwa perubahan ekspektasi yang diharapkan selama masa eksposur. Hal ini menggabungkan dampak penarikan fasilitas yang *committed* pembayaran pokok dan bunga, amortisasi dan pembayaran dipercepat, bersama dengan dampak asumsi ekonomi masa depan jika relevan.

h. Penurunan nilai dari aset non-keuangan

Nilai tercatat aset non-keuangan Bank, selain aset pajak tangguhan, dikaji pada setiap tanggal pelaporan untuk menentukan ada tidaknya indikasi penurunan nilai. Untuk tujuan pengujian penurunan nilai, aset yang tidak dapat diuji secara individual dapat digabungkan ke dalam kelompok aset terkecil yang menghasilkan arus kas masuk dari penggunaan berkelanjutan yang sebagian besar independen dari arus kas masuk dari aset lainnya (Unit Penghasil Kas atau "CGU"). Jika terdapat indikasi adanya penurunan nilai tersebut, maka nilai terpulihkan aset diestimasi.

Kerugian penurunan nilai diakui jika nilai tercatat suatu aset atau CGU melebihi estimasi nilai terpulihkannya. Nilai terpulihkan suatu aset adalah nilai yang terbesar antara nilai pakai aset atau CGU dan nilai wajar dikurangi biaya penjualan. Dalam penentuan nilai pakai aset, estimasi arus kas masa depan didiskontokan menggunakan tingkat diskonto sebelum pajak yang menggambarkan penilaian pasar kini atas nilai waktu dari uang dan risiko yang terkait dengan aset yang bersangkutan.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

g. Impairment of financial assets (continued)

b. Loss Given Default ("LGD")

The loss that is expected to arise on default, incorporating the impact of relevant forward looking economic assumptions (if any), which represents the difference between the contractual cash flows due and those that the Bank expects to receive. The Bank estimates LGD based on the historical recovery rates and considers the recovery of any collateral that is integral to the financial assets, taking into account forward looking economic assumptions if relevant.

c. Exposure at Default ("EAD")

The expected balance sheet exposure at the time of default, taking into account that expected change in exposure over the lifetime of the exposure. This incorporates the impact of drawdowns of committed facilities, repayments of principal and interest, amortisation and prepayments, together with the impact of forward looking economic assumptions where relevant.

h. Impairment of non-financial assets

The carrying amount of the Bank's non-financial assets, other than deferred tax assets, are reviewed at each reporting date to determine whether there is any indication of impairment. For the purpose of impairment testing, assets that cannot be tested individually are grouped together into the smallest group of assets that generates cash inflows from continuing use that are largely independent of the cash inflows of other assets (Cash Generating Units or "CGU"). If any such indication exists, then the asset's recoverable amount is estimated.

An impairment loss is recognised if the carrying amount of an asset or CGU exceeds its estimated recoverable amount. The recoverable amount of an asset or CGU is the greater of its value in use and its fair value less cost to sell. In assessing value in use, the estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

h. Penurunan nilai dari aset non-keuangan (lanjutan)

Kerugian penurunan nilai atas aset non-keuangan yang diakui pada tahun sebelumnya dikaji pada setiap tanggal pelaporan keuangan untuk menilai apakah terdapat indikasi bahwa rugi penurunan nilai yang telah diakui sebelumnya telah menurun atau tidak ada lagi. Kerugian penurunan nilai, kecuali untuk *goodwill*, dipulihkan jika terdapat perubahan estimasi yang digunakan untuk menentukan nilai terpulihkan. Jumlah kerugian penurunan nilai yang dibalik tidak boleh menyebabkan nilai aset melebihi nilai tercatat bersih setelah penyusutan atau amortisasi, seandainya tidak ada kerugian penurunan nilai yang diakui.

i. Kas dan setara kas

Kas meliputi kas dan kas dalam *khasanah*. Untuk tujuan laporan arus kas, kas dan setara kas mencakup kas, giro pada Bank Indonesia, giro pada bank lain, penempatan pada Bank Indonesia dan bank lain, dan Sertifikat Bank Indonesia yang jatuh tempo dalam 3 (tiga) bulan atau kurang sejak tanggal perolehan yang tidak dijaminkan atau dibatasi penggunaannya.

j. Giro pada Bank Indonesia dan bank lain

Giro pada Bank Indonesia dan bank lain diklasifikasikan sebagai aset keuangan yang diukur pada biaya perolehan diamortisasi. Lihat Catatan 2d untuk kebijakan akuntansi atas aset keuangan.

Giro pada Bank Indonesia dan bank lain dinyatakan sebesar saldo giro dikurangi dengan cadangan kerugian penurunan nilai.

k. Penempatan pada Bank Indonesia dan bank lain

Penempatan pada Bank Indonesia dan bank lain merupakan penanaman dana dalam bentuk *interbank call money*, Deposito berjangka, Sertifikat deposito, dan Fasilitas Simpanan Bank Indonesia ("FASBI").

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

h. Impairment of non-financial assets (continued)

Impairment losses in respect of non-financial assets recognised in prior year are assessed at each reporting date for any indications that the loss has decreased or no longer exists. An impairment loss, except for goodwill, is reversed if there has been a change in the estimates used to determine the recoverable amount. An impairment loss is reversed only to the extent that the asset's carrying amount does not exceed the carrying amount that would have been determined, net of depreciation or amortisation, if no impairment loss had been recognised.

i. Cash and cash equivalents

Cash includes cash on hand and cash in vault. For the purpose of the statement of cash flows, cash and cash equivalents include cash, current accounts with Bank Indonesia, current accounts with other banks, placements with Bank Indonesia and other banks, and Certificates of Bank Indonesia maturing within 3 (three) months or less from the date of acquisition and are not pledged or restricted.

j. Current accounts with Bank Indonesia and other banks

Current accounts with Bank Indonesia and other banks are classified as financial assets measured at amortised cost. Refer to Note 2d for the accounting policy of financial assets.

Current accounts with Bank Indonesia and other banks are stated at the outstanding balance less allowance for impairment losses.

k. Placements with Bank Indonesia and other banks

Placements with Bank Indonesia and other banks consist of interbank call money, Time deposit, Certificate of deposits, and Bank Indonesia Deposit Facility ("FASBI").

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

l. Efek-efek

Efek-efek yang dimiliki terdiri dari Sertifikat Bank Indonesia ("SBI"), Sekuritas Rupiah Bank Indonesia ("SRBI"), Surat Utang Negara, Surat Berharga Syariah Negara, obligasi korporasi, wesel jangka menengah, unit penyertaan reksadana, dan efek-efek pasar uang dan pasar modal lainnya.

Setelah pengakuan awal, efek-efek diukur sesuai dengan klasifikasinya masing-masing, sebagai diukur pada biaya perolehan diamortisasi atau diukur pada nilai wajar melalui pendapatan komprehensif lain ("FVOCI") atau diukur pada nilai wajar melalui laporan laba rugi ("FVTPL").

1. Diukur pada biaya perolehan diamortisasi

Setelah pengakuan awal, investasi diukur pada biasa perolehan diamortisasi dengan menggunakan metode suku bunga efektif.

2. Diukur pada FVOCI

Setelah pengakuan awal, diukur pada nilai wajar dimana keuntungan dan kerugian yang belum direalisasi atas perubahan nilai wajar akan diakui sebagai penghasilan komprehensif lain. Perubahan pada kerugian kredit ekspektasian diakui laba rugi dan diakumulasi pada ekuitas. Pada saat penghentian pengakuan, akumulasi keuntungan atau kerugian nilai wajar bersih, setelah akumulasi cadangan kerugian penurunan nilai, ditransfer ke laba rugi.

3. Diukur pada FVTPL

Seluruh aset keuangan yang tidak diklasifikasikan sebagai diukur dengan biaya perolehan diamortisasi atau FVOCI sebagaimana ketentuan di atas diukur dengan FVTPL. Instrumen keuangan yang dikelompokkan ke dalam kategori ini diakui pada nilai wajarnya pada saat pengakuan awal; biaya transaksi diakui secara langsung ke dalam laporan laba rugi. Keuntungan dan kerugian yang timbul dari perubahan nilai wajar dan penjualan instrumen keuangan diakui di dalam laporan laba rugi.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

l. Marketable securities

Marketable securities consist of Certificates of Bank Indonesia ("SBI"), Bank Indonesia Rupiah Securities ("SRBI"), Government Promissory Notes, Government Sharia Bonds, corporate bonds, medium term notes, mutual fund investment units and other money market and capital market securities.

Subsequently accounted for, marketable securities depending on their respective classifications, as either measured at amortised cost or measured at fair value through other comprehensive income ("FVOCI") or measured at fair value through profit or loss ("FVTPL").

1. Measured at amortised cost

Accounted for, investment measured at amortised cost using effective interest rate method.

2. Measured at FVOCI

Accounted for, investment carried at fair value with all unrealised gains and losses arising from changes in fair value recognised in other comprehensive income. Changing in expected credit losses recognised in the profit or loss and are accumulated in equity. On derecognition, the cumulative fair value gains or losses, net of cumulative allowance for impairmen losses, are transferred to the profit or loss.

3. Measured at FVTPL

All financial assets not classified as measured at amortised cost or FVOCI as described above are measured at FVTPL. Financial instruments grouped into this category are recognised at their fair value at initial recognition; transaction costs are recognised directly in the statement of profit or loss. Gains and losses arising from changes in fair value and sale of financial instruments are recognised in the statement of profit or loss.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

m. Pinjaman yang diberikan

Pinjaman yang diberikan adalah penyediaan uang atau tagihan yang dapat disetarakan dengan kas, berdasarkan persetujuan atau kesepakatan pinjam-meminjam dengan debitur, mewajibkan pihak debitur untuk melunasi hutang berikut bunganya setelah jangka waktu tertentu.

Restrukturisasi pinjaman bisa meliputi modifikasi persyaratan pinjaman, konversi pinjaman menjadi saham atau instrumen keuangan lainnya dan/atau kombinasi dari keduanya.

Pinjaman yang direstrukturisasi dan tidak dihentikan pengakuannya disajikan sebesar nilai yang lebih rendah antara nilai tercatat pinjaman pada tanggal restrukturisasi atau proyeksi nilai kini dari penerimaan kas masa depan setelah restrukturisasi. Kerugian akibat selisih antara nilai tercatat pinjaman pada tanggal restrukturisasi dengan nilai tunai penerimaan kas masa depan setelah restrukturisasi diakui sebagai laba/rugi. Setelah restrukturisasi, semua penerimaan kas masa depan yang ditetapkan dalam persyaratan baru dicatat sebagai pengembalian pokok pinjaman yang diberikan dan pendapatan bunga sesuai dengan syarat-syarat restrukturisasi.

n. Efek-efek yang dibeli dengan janji dijual kembali dan efek-efek yang dijual dengan janji dibeli kembali

Efek-efek yang dibeli dengan janji dijual kembali merupakan transaksi dimana Bank membeli aset keuangan dan secara simultan masuk ke dalam perjanjian untuk menjual kembali aset (atau aset yang serupa secara substansial) dengan harga tetap di masa depan. Aset yang mendasari tidak diakui dalam laporan keuangan. Setelah pengakuan awal, efek-efek yang dibeli dengan janji dijual kembali diukur pada biaya perolehan diamortisasi. Selisih antara harga beli dan harga jual kembali diakui sebagai pendapatan bunga dengan menggunakan metode suku bunga efektif.

Efek-efek yang dijual dengan janji dibeli kembali merupakan transaksi dimana Bank menjual aset keuangan dan secara simultan masuk ke dalam perjanjian untuk membeli kembali aset (atau aset yang serupa secara substansial) dengan harga tetap di masa depan.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

m. Loans

Loans represent provision of cash or cash equivalents based on agreements with debtor, where debtor required to repay their debts with interest after specified periods.

Loan restructuring may involve a modification of the terms of the loans, conversion of loans into equity or other financial instruments and/or a combination of both.

Restructured loans which are not derecognised, are stated at the lower of carrying value of the loan at the time of restructuring or net present value of the estimate of total future cash receipts after restructuring. Losses arising from any excess of the carrying value of the loan at the time of restructuring over the net present value of the total future cash receipts after restructuring are recognised as profit/loss. Thereafter, all cash receipts under the new terms shall be accounted for as the recovery of principal and interest revenue, in accordance with the restructuring scheme.

n. Securities purchased under resale agreements and securities sold under repurchase agreements

Securities purchased under resale agreements are transactions in which the Bank purchases a financial asset and simultaneously enters into an agreement to resell the asset (or substantially similar asset) at a fixed price on a future date. The underlying asset is not recognised in the financial statements. Subsequent to initial recognition, securities purchased under resale agreements are measured at amortised cost. The difference between purchase and resale price is recognised as interest income using the effective interest method.

Securities sold under repurchase agreements are transactions in which the Bank sold a financial asset and simultaneously enters into an agreement to repurchase the asset (or substantially similar asset) at a fixed price on a future date.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

n. Efek-efek yang dibeli dengan janji dijual kembali dan efek-efek yang dijual dengan janji dibeli kembali (lanjutan)

Efek-efek yang dijual dengan janji untuk dibeli kembali disajikan sebagai liabilitas dalam laporan posisi keuangan sebesar harga beli kembali yang disepakati dikurangi selisih antara harga jual dan harga beli kembali yang disepakati. Selisih antara harga jual dan harga beli kembali yang disepakati tersebut diamortisasi sebagai beban bunga selama jangka waktu sejak efek-efek dijual hingga dibeli kembali.

o. Tagihan dan utang akseptasi

Setelah pengakuan awal, tagihan dan utang akseptasi diukur pada biaya perolehan diamortisasi dengan menggunakan metode suku bunga efektif.

p. Penyertaan saham

(A) Penyertaan saham

Penyertaan saham merupakan investasi jangka panjang pada perusahaan non-publik.

Penyertaan saham merupakan investasi jangka panjang pada perusahaan non-publik.

Penyertaan dalam bentuk saham dengan kepemilikan kurang dari 20% yang nilai wajarnya tidak tersedia dan dimaksudkan untuk penyertaan jangka panjang dinyatakan sebesar estimasi terbaik atas nilai wajarnya. Bila terjadi penurunan nilai yang bersifat permanen, nilai tercatatnya dikurangi untuk mengakui penurunan tersebut yang ditentukan untuk setiap investasi secara individu dan kerugiannya dibebankan pada laporan laba rugi tahun berjalan.

(B) Penyertaan saham sementara

Penyertaan saham sementara merupakan penyertaan modal oleh Bank, dalam bentuk saham pada perusahaan debitur untuk mengatasi akibat kegagalan kredit, sebagaimana dimaksud dalam ketentuan peraturan perundang-undangan yang berlaku.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

n. Securities purchased under resale agreements and securities sold under repurchase agreements (continued)

Securities sold under repurchase agreements are presented as liabilities in the statement of financial position at the agreed repurchase price less the difference between the selling price and agreed repurchase price. The difference between the selling price and agreed repurchase price is amortised as interest expense over the period commencing from the selling date to the repurchase date.

o. Acceptance receivables and payables

Subsequent to initial recognition, acceptance receivables and payables are measured at amortised cost using the effective interest method.

p. Investment in shares

(A) Investment in shares

Investment in shares of stock are long-term investments in non-public companies.

Investment in shares of stock are long-term investments in non-public companies.

Investments in shares of stock where the ownership interest of less than 20% that do not have readily determinable fair values and are intended for long-term investments are stated at their best estimate of fair value. The carrying amount of the investments is written-down to recognise a permanent decline in the value of the individual investments. Any such write-down is charged directly to current year statement of profit or loss.

(B) Temporary investment in shares

Temporary investment in shares is investment in shares by Bank to debtor's company to overcome the credit defaults, in accordance with the prevailing laws.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

p. Penyertaan saham (lanjutan)

(B) Penyertaan saham sementara (lanjutan)

Bank wajib melakukan divestasi penyertaan saham sementara apabila penyertaan saham sementara telah melebihi jangka waktu paling lama 5 (lima) tahun atau perusahaan tersebut telah memperoleh saldo laba positif pada ekuitasnya.

Penyertaan dalam bentuk saham dengan kepemilikan lebih dari 20%, tanpa ada pengaruh signifikan diklasifikasikan sebagai aset keuangan yang diukur pada nilai wajar melalui laporan laba rugi. Lihat Catatan 2d untuk kebijakan akuntansi atas aset keuangan dalam kelompok yang diukur pada nilai wajar melalui laporan laba rugi.

q. Aset tetap dan penyusutan

Pada tanggal 30 November 2015, Bank melakukan perubahan kebijakan akuntansi atas aset tetap dari model biaya menjadi model revaluasi.

Aset tetap Bank disajikan sebesar nilai wajar, dikurangi akumulasi penyusutan dan cadangan kerugian penurunan nilai untuk aset tetap (jika ada). Penilaian terhadap aset tetap dilakukan oleh penilai independen eksternal yang telah memiliki sertifikasi. Penilaian atas aset tersebut dilakukan secara berkala untuk memastikan bahwa nilai wajar aset yang direvaluasi tidak berbeda secara material dengan nilai tercatatnya. Berdasarkan kebijakan internal Bank, penilaian terhadap aset tetap yang dilakukan oleh penilai independen eksternal dilakukan 5 tahun sekali. Akumulasi penyusutan pada tanggal revaluasi dieliminasi terhadap nilai tercatat bruto aset, dan nilai bersihnya disajikan kembali sebesar nilai revaluasian aset tetap.

Kenaikan nilai tercatat yang timbul dari revaluasi aset tetap dicatat sebagai "Surplus revaluasi aset" dan disajikan sebagai "Penghasilan Komprehensif Lain". Penurunan yang menghapus nilai kenaikan yang sebelumnya atas aset yang sama dibebankan terhadap "Surplus revaluasi aset" sebagai bagian dari laba komprehensif; penurunan lainnya dibebankan pada laporan laba rugi.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

p. Investment in shares (continued)

(B) Temporary investment in shares (continued)

Bank is obliged to divest temporary investment in shares if the temporary investment in shares have exceeded if maximum period of 5 (five) years or the company have obtained positive retained earnings in equity.

Investments in shares where the ownership above 20%, without any significant influence is classified as financial assets at fair value through profit or loss. Refer to Note 2d for the accounting policy of financial assets at fair value through profit or loss.

q. Fixed assets and depreciation

On November 30, 2015, the Bank changed their accounting policies of fixed assets from cost model to revaluation model.

The Bank's fixed assets are shown at fair value, less subsequent depreciation for fixed assets less accumulated impairment losses (if any). Valuation of fixed assets are performed by external independent valuers with certain qualification. Valuations are performed with sufficient regularity to ensure that the fair value of a revalued asset does not differ materially from its carrying amount. Based on Bank's internal policy, valuation of fixed assets performed by external independent valuers for every 5 years. Any accumulated depreciation at the date of revaluation is eliminated against the gross carrying amount of the asset, and the net amount is restated to the revalued amount of the asset.

Increases in the carrying amount arising on revaluation of fixed assets recorded in "Assets revaluation reserve" and presented as "Other Comprehensive Income". Decreases that offset previous increases of the same asset are debited against "Asset revaluation reserve" as part of other comprehensive income; all other decreases are charged to the statement of profit or loss.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

q. Aset tetap dan penyusutan (lanjutan)

Surplus revaluasi aset tetap dialihkan langsung ke saldo laba ketika aset tersebut dihentikan pengakuannya.

Tanah tidak disusutkan.

Penyusutan aset tetap selain tanah dihitung dengan menggunakan metode garis lurus untuk mengalokasikan nilai setelah revaluasi terhadap nilai sisa sepanjang estimasi masa manfaatnya sebagai berikut:

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

q. Fixed assets and depreciation (continued)

Gain on revaluation of fixed assets are transferred to retained earnings when fixed assets are derecognised.

Land is not depreciated.

Depreciation of fixed assets other than land are calculated based on the straight-line method to allocate their revalued amount to their residual values over their estimated useful lives as follows:

	Masa manfaat/ *Useful lives* Tahun/*Years*	**Penyusutan (persentase)/ *Depreciation (percentage)***	
Gedung kantor	20	5%	*Office buildings*
Kendaraan bermotor	4	25%	*Vehicles*
Mesin dan peralatan	4	25%	*Machinery and equipment*
Perlengkapan dan perabotan kantor	4	25%	*Office furniture and equipment*

Nilai sisa aset, masa manfaat, dan metode penyusutan akan ditinjau dan jika perlu disesuaikan pada setiap akhir periode pelaporan.

The assets residual values, useful lives, and depreciation method are reviewed and adjusted if appropriate at the end of each reporting period.

Pada tanggal 31 Desember 2024 dan 2023, tidak terdapat penyesuaian atas masa manfaat dan metode penyusutan.

As of December 31, 2024 and 2023, there are no adjustment on useful life and depreciation method.

Apabila nilai tercatat aset lebih besar dari nilai yang dapat diperoleh kembali, nilai tercatat aset diturunkan menjadi sebesar nilai yang dapat diperoleh kembali, dengan menggunakan nilai tertinggi antara harga jual bersih dan nilai pakai.

When the carrying amount of an asset is greater than its estimated recoverable amount, it is written down immediately to its recoverable amount, which is determined as the higher of net selling price or value in use.

Apabila aset tetap tidak digunakan lagi atau dijual, maka nilai wajar dan akumulasi penyusutannya dihapuskan dari laporan keuangan. Keuntungan atau kerugian yang terjadi, diakui sebagai laba/rugi periode terjadinya.

When assets are retired or disposed, their fair value and the related accumulated depreciation are eliminated from the financial statements. The resulting gains or losses are recognised as related period's profit/loss.

Biaya pemeliharaan dan perbaikan dicatat sebagai beban pada saat terjadinya. Pengeluaran yang memperpanjang masa manfaat aset dikapitalisasi dan disusutkan.

Maintenance and repair cost are charged as an expense when incurred. Expenditure that extends the useful life of assets is capitalised and depreciated.

Aset tetap dalam proses pembangunan merupakan aset yang masih dalam proses renovasi atau pemasangan dan belum siap digunakan, serta dimaksudkan untuk dipergunakan dalam kegiatan usaha. Aset ini dicatat sebesar biaya yang telah dikeluarkan.

Assets under construction consist of assets that are still in progress of renovation or installments and not yet ready for use and intended to be used in business activity. This accounts recorded based on amounts paid.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

r. Aset tak berwujud

Aset tak berwujud yang dimiliki oleh Bank berupa perangkat lunak.

Perangkat lunak, yang bukan merupakan bagian integral dari perangkat keras yang terkait, dicatat sebagai aset tak berwujud dan dinyatakan sebesar nilai tercatat, yaitu sebesar harga perolehan dikurangi dengan akumulasi amortisasi.

Biaya perolehan perangkat lunak terdiri dari seluruh pengeluaran yang dapat dikaitkan langsung dalam persiapan perangkat lunak tersebut sehingga siap digunakan sesuai dengan maksud manajemen.

Pengeluaran setelah perolehan perangkat lunak dapat ditambahkan pada biaya perolehan perangkat lunak atau dikapitalisasi sebagai perangkat lunak hanya jika pengeluaran tersebut menambah manfaat ekonomis masa depan dari perangkat lunak yang bersangkutan sehingga menjadi lebih besar dari standar kinerja yang diperkirakan semula. Pengeluaran yang tidak menambah manfaat ekonomis masa depan dari perangkat lunak diakui sebagai beban pada saat terjadinya.

Perangkat lunak dengan umur manfaat terbatas, diamortisasi dengan menggunakan metode garis lurus selama estimasi masa manfaat ekonomis aset yaitu 4 (empat) tahun.

s. Agunan yang diambil alih

Agunan yang diambil alih (AYDA) adalah aset yang diperoleh Bank, baik melalui pelelangan maupun diluar pelelangan berdasarkan penyerahan secara sukarela oleh pemilik agunan atau berdasarkan kuasa untuk menjual diluar lelang dari pemilik agunan dalam hal debitur tidak memenuhi kewajibannya kepada Bank. AYDA merupakan jaminan yang diambil alih sebagai bagian dari penyelesaian pinjaman yang diberikan. Bank memiliki kebijakan untuk selalu berusaha menjual AYDA untuk menyelesaikan sisa kewajiban debitur.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

r. Intangible assets

Intangible assets held by the Bank is software.

The software, that is not an integral part of the related hardware, is recorded as an intangible asset and is stated at carrying value, which is at cost less accumulated amortisation.

Software acquisition costs consist of all expenditures attributed directly in the preparation of the software so ready to use in accordance with the intent of management.

Expenditures after acquisition software can be added to the cost of software or capitalised as software only if the expenses add future economic benefits of the software so as to be larger than originally expected performance standards. Expenditure that does not add to future economic benefits of the software are recognised as an expense when incurred.

Software with certain useful life, are amortised using straight-line method over the estimated useful life of the assets, which is 4 (four) years.

s. Foreclosed assets

Foreclosed assets represent assets acquired by Bank, both from auction and non-auction based on voluntary transfer by the debtors or based on debtor's approval to sell the collateral where the debtors could not fulfill their obligations to Bank. Foreclosed assets represent collateral acquired in settlement of loans. The Bank has policy to sell foreclosed assets to settle debtor's liabilities.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

s. Agunan yang diambil alih (lanjutan)

AYDA diakui sebesar jumlah yang lebih rendah antara nilai tercatat dengan nilai bersih yang dapat direalisasi (net realisable value), yaitu nilai wajar agunan setelah dikurangi estimasi biaya pelepasan. Bila terjadi penurunan nilai yang bersifat permanen, maka nilai tercatatnya dikurangi untuk mengakui penurunan tersebut dan kerugiannya dibebankan dalam laporan laba rugi.

Biaya pemeliharaan atas AYDA yang terjadi setelah pengambilalihan atau akuisisi aset dibebankan sebagai laba/rugi pada saat terjadinya. Keuntungan atau kerugian dari penjualan agunan yang diambil alih diakui sebagai laba/rugi tahun berjalan.

t. Biaya dibayar dimuka dan aset lain-lain

Biaya dibayar dimuka merupakan pembayaran kepada pihak lain yang telah dilakukan namun belum merupakan beban pada saat pembayaran dilakukan. Biaya dibayar dimuka akan digunakan untuk aktivitas Bank di masa mendatang. Biaya dibayar dimuka akan diakui sebagai beban pada saat diamortisasi sesuai dengan masa manfaatnya.

Termasuk dalam biaya dibayar dimuka adalah pembiayaan, pengembangan teknologi, promosi dan beban renovasi gedung.

Termasuk di dalam aset lain-lain antara lain adalah uang muka jaminan, uang muka pembelian aset, dan uang muka pengembangan teknologi.

u. Simpanan nasabah dan simpanan dari bank lain

Simpanan nasabah adalah dana yang dipercayakan oleh masyarakat (selain bank) kepada Bank berdasarkan perjanjian penyimpanan dana. Termasuk dalam pos ini adalah giro, tabungan, deposito berjangka, sertifikat deposito dan bentuk lain yang dapat dipersamakan dengan itu.

Simpanan dari bank lain terdiri dari liabilitas terhadap bank lain dalam bentuk giro, *interbank call money*, deposito berjangka, tabungan, dan *deposito on call*.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

s. Foreclosed assets (continued)

Foreclosed assets are recognised at lower amount between carrying value and their net realisable value, which is the fair value of the foreclosed assets less estimated cost of liquidating the foreclosed assets. If there is a permanent decline in value, the carrying amount of foreclosed collaterals in written down to recognise such permanent decline in value. Any such write-down is recognised statement of profit or loss.

Holding costs of foreclosed assets subsequent to the foreclosure or acquisition of the assets are charged as current year profit/loss as incurred. Gains or losses from sale of foreclosed assets are charged as current year profit/loss as incurred.

t. Prepaid expenses and other assets

Prepaid expenses are payments made to other parties but have not been recognised as expense at the time of payment. Prepaid expenses will be used for Bank's activities in the future. Prepaid expenses are recognised as expenses during the amortisation in accordance with the expected period of benefit.

Included in prepaid expenses are financing, technology development, promotion and office building renovation expense.

Included in other assets are amongst others membership deposits, advance for fixed assets purchase, advance for technology development.

u. Deposits from customers and deposits from other banks

Deposits from customers are the funds placed by customers (excluding banks) with Bank based on fund deposit agreements. Included in this account are demand deposits, saving deposits, time deposits, certificates of deposits, and other forms which are similar.

Deposits from other banks represent liabilities to banks in the form of demand deposits, inter-bank call money, time deposits, saving accounts, and deposits on call.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

u. Simpanan nasabah dan simpanan dari bank lain (lanjutan)

Simpanan dari nasabah dan dari bank lain diklasifikasikan sebagai liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi. Lihat Catatan 2d untuk kebijakan akuntansi atas liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi.

v. Efek-efek yang diterbitkan

Efek-efek yang diterbitkan adalah obligasi yang diterbitkan dan diklasifikasikan sebagai liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi. Lihat Catatan 2d untuk kebijakan akuntansi atau liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi.

Biaya transaksi yang timbul sehubungan dengan penerbitan efek-efek dikurangkan dari hasil penerbitan efek-efek bersangkutan. Selisih antara hasil emisi bersih dengan nilai nominal obligasi diakui sebagai diskonto yang diamortisasi menggunakan metode suku bunga efektif selama umur obligasi.

w. Pinjaman yang diterima

Pada pengukuran awal pinjaman diterima dan pinjaman subordinasi disajikan sebesar nilai wajar dikurangi dengan biaya transaksi yang dapat diatribusikan langsung dengan perolehan/penerbitan pinjaman dan obligasi subordinasi.

Pinjaman yang diterima dan pinjaman subordinasi diklasifikasikan sebagai liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi. Lihat Catatan 2d untuk kebijakan akuntansi atas liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi.

x. Transaksi Sewa

Pada tanggal permulaan kontrak, Bank menilai apakah kontrak merupakan atau mengandung sewa. Suatu kontrak merupakan atau mengandung sewa jika kontrak tersebut memberikan hak untuk mengendalikan penggunaan aset identifikasian selama suatu jangka waktu untuk dipertukarkan dengan imbalan. Bank dapat memilih untuk tidak mengakui aset hak-guna dan liabilitas sewa untuk:

- Sewa jangka pendek; dan
- Sewa yang aset pendasarnya bernilai-rendah.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

u. Deposits from customers and deposits from other banks (continued)

Deposits from customers and other banks are classified as financial liabilities measured at amortised cost. Refer to Note 2d for the accounting policy for financial liabilities measured at amortised cost.

v. Marketable Securities issued

Marketable securities issued is the issuance of bond which is classified as financial liabilities measured at amortised cost. Refer to Note 2d for the accounting policy for financial liabilities at amortised cost.

Transaction cost in relation with the marketable securities issued is deducted from the related marketable securities issued. Any difference between net proceed of bond issuance and nominal of bond is recognised as discount and will be amortised using effective interest rate during bond's period.

w. Borrowings

Borrowings and subordinated loans are initially presented at fair value less directly attributable transaction costs to the acquisition or issuance of subordinated loans and bonds.

Borrowings and subordinated loans are classified as financial liabilities measured at amortised cost. Refer to Note 2d for the accounting policy for financial liabilities measured at amortised cost.

x. Leases Transaction

At the inception of a contract, the Bank assesses whether the contract is or contains a leases. A contract is or contains a leases if the contract conveys the right to control the use of an identified assets for a period of time in exchange for consideration. The Bank can choose not to recognise the right-of-use asset and lease liabilities for:

- *Short-term lease; and*
- *Low value asset.*

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

x. Transaksi Sewa (lanjutan)

Untuk menilai apakah kontrak memberikan hak untuk mengendalikan penggunaan aset identifikasian, Bank harus menilai apakah:

- Bank memiliki hak untuk mendapatkan secara substansial seluruh manfaat ekonomi dari penggunaan aset identifikasian; dan
- Bank memiliki hak untuk mengarahkan penggunaan aset identifikasian. Bank memiliki hak ini ketika Bank memiliki hak untuk pengambilan keputusan yang relevan tentang bagaimana dan untuk tujuan apa aset digunakan telah ditentukan sebelumnya:
  1. Bank memiliki hak untuk mengoperasikan aset; dan
  2. Bank telah mendesain aset dengan cara menetapkan sebelumnya bagaimana dan untuk tujuan apa aset akan digunakan selama periode penggunaan.

Pada tanggal permulaan sewa, Bank mengakui aset hak-guna dan liabilitas sewa. Aset hak-guna diukur pada biaya perolehan, dimana meliputi jumlah pengukuran awal liabilitas sewa yang disesuaikan dengan pembayaran sewa yang dilakukan pada atau sebelum tanggal permulaan, ditambah dengan biaya langsung awal yang dikeluarkan. Aset hak-guna diamortisasi dengan menggunakan metode garis lurus sepanjang jangka waktu sewa.

Liabilitas sewa diukur pada nilai kini pembayaran sewa yang belum dibayar pada tanggal permulaan, didiskontokan dengan menggunakan suku bunga implisit dalam sewa atau jika suku bunga tersebut tidak dapat ditentukan, maka menggunakan suku bunga pinjaman inkremental. Pada umumnya, Bank menggunakan suku bunga pinjaman inkremental sebagai tingkat bunga diskonto.

Pembayaran sewa dialokasikan menjadi bagian pokok dan biaya keuangan. Biaya keuangan dibebankan pada laba rugi selama periode sewa sehingga menghasilkan tingkat suku bunga periodik yang konstan atas saldo liabilitas untuk setiap periode.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

x. Leases Transaction (continued)

To assess whether a contract conveys the right to control the use of an identified asset, the Bank shall assess whether:

- *The Bank has the right to obtain substantially all the economic benefit from use of the asset throughout the period of use; and*
- *The Bank has the right to direct the use of the asset. The Bank has described when it has a decision-making rights that are the most relevant to changing how and for what purpose the asset is used are predetermined:*
  1. *The Bank has the right to operate the asset; and*
  2. *The Bank has designed the asset in a way that predetermine how and for what purpose it will be used.*

The Bank recognises a right-of-use asset and a leases liability at the leases commencement date. The right-of-use asset is initially measured at cost, which comprises the initial amount of the leases liability adjusted for any leases payment made at or before the commencement date, plus any initial direct cost incurred. The right-of-use asset is amortised over the straight-line method throughout the lease term.

The lease liability is initially measured at the present value of the lease payments that are not paid at the commencement date, discounted using the interest rate implicit in the lease or, if that right cannot be readily determined, using incremental borrowing rate. Generally, the Bank uses its incremental borrowing rate as a discount rate.

Each leases payment is allocated between the liability and finance cost. The finance cost is charged to profit or loss over the leases period so as to produce a constant periodic rate of interest on the remaining balance of the liability for each period.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

x. Transaksi Sewa (lanjutan)

Jika sewa mengalihkan kepemilikan aset pendasar kepada Bank pada akhir masa sewa atau jika biaya perolehan aset hak-guna merefleksikan Bank akan mengeksekusi opsi beli, maka Bank menyusutkan aset hak-guna dari tanggal permulaan hingga akhir umur manfaat aset pendasar. Jika tidak, maka Bank menyusutkan aset hak-guna dari tanggal permulaan hingga tanggal yang lebih awal antara akhir umur manfaat aset hak-guna atau akhir masa sewa.

Bank menganalisa fakta dan keadaan untuk masing-masing jenis hak atas tanah dalam menentukan akuntansi untuk masing-masing hak atas tanah tersebut sehingga dapat merepresentasikan dengan tepat suatu kejadian atau transaksi ekonomik yang mendasarinya. Jika hak atas tanah tersebut tidak mengalihkan pengendalian atas aset pendasar kepada Bank, melainkan mengalihkan hak untuk menggunakan aset pendasar, Bank menerapkan perlakuan akuntansi atas transaksi tersebut sebagai sewa berdasarkan PSAK 116 (dahulu PSAK 73), "Sewa", kecuali jika hak atas tanah secara substansi menyerupai pembelian tanah, maka Bank menerapkan PSAK 216 (dahulu PSAK 16), "Aset tetap".

Modifikasi sewa

Bank mencatat modifikasi sewa sebagai sewa terpisah jika:

- modifikasi meningkatkan ruang lingkup sewa dengan menambahkan hak untuk menggunakan satu aset pendasar atau lebih;
- imbalan sewa meningkat sebesar jumlah yang setara dengan harga tersendiri untuk peningkatan dalam ruang lingkup dan penyesuaian yang tepat pada harga tersendiri tersebut untuk merefleksikan kondisi kontrak tertentu.

y. Pendapatan dan beban bunga

Pendapatan dan beban bunga untuk semua instrumen keuangan dengan *interest bearing* dicatat dalam pendapatan bunga dan beban bunga menggunakan metode suku bunga efektif.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

x. Leases Transaction (continued)

If the leases transfers ownership of the underlying asset to the Bank by the end of the leases term or if the cost of the right-of-use asset reflects that the Bank will exercise a purchase option, the Bank depreciates the right-of-use asset from the commencement date to the end of the useful life of the underlying asset. Otherwise, the Bank depreciates the right-of-use asset from the commencement date to the earlier of the end of the useful life of the right-of-use asset or the end of the leases term.

The Bank analyses the facts and circumstances for each type of landrights in determining the accounting for each of these land rights so that it can accurately represent an underlying economic event or transaction. If the landrights do not transfer control of the underlying assets to the Bank, but gives the rights to use the underlying assets, the Bank applies the accounting treatment of these transactions as leases under SFAS 116 (previously SFAS 73), "Lease", except if landrights substantially similar to land purchases, the Bank applies SFAS 216 (previously SFAS 16), "Property, plant and equipment".

Leases modification

The Bank account for a leases modification as a separate leases if both:

- *the modification increases the scope of the leases by adding the right to use one or more underlying assets;*
- *the consideration for the leases increases by an amount commensurate with the stand-alone price for the increase in scope and any appropriate adjustments to that stand-alone price to reflect the circumstances of the particular contract.*

y. Interest income and expense

Interest income and expense for all interest bearing financial instruments are recorded within interest income and interest expense using the effective interest rate method.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

y. Pendapatan dan beban bunga (lanjutan)

Metode suku bunga efektif adalah metode yang digunakan untuk menghitung biaya perolehan diamortisasi dari aset keuangan atau liabilitas keuangan dan metode untuk mengalokasikan pendapatan bunga atau beban bunga selama periode yang relevan.

Suku bunga efektif adalah suku bunga yang secara tepat mendiskontokan estimasi pembayaran atau penerimaan kas di masa datang selama perkiraan umur dari instrumen keuangan, atau bilamana tepat, digunakan periode yang lebih singkat untuk memperoleh nilai tercatat bersih dari aset keuangan atau liabilitas keuangan. Pada saat menghitung suku bunga efektif, Bank mengestimasi arus kas dengan mempertimbangkan seluruh persyaratan kontraktual dalam instrumen keuangan tersebut, namun tidak mempertimbangkan kerugian kredit di masa datang. Perhitungan ini mencakup seluruh komisi, provisi, dan bentuk lain yang dibayarkan atau diterima oleh para pihak dalam kontrak yang merupakan bagian tak terpisahkan dari suku bunga efektif, biaya transaksi, dan seluruh premi atau diskon lainnya.

Jika aset keuangan atau kelompok aset keuangan serupa telah diturunkan nilainya sebagai akibat kerugian penurunan nilai, maka pendapatan bunga yang diperoleh setelahnya diakui atas bagian aset keuangan yang tidak mengalami penurunan nilai, berdasarkan suku bunga yang digunakan untuk mendiskonto arus kas masa datang dalam menghitung kerugian penurunan nilai.

Pendapatan bunga atas pinjaman yang diberikan atau aset produktif lainnya yang diklasifikasikan sebagai bermasalah diakui pada saat pendapatan tersebut diterima. Pada saat aset keuangan diklasifikasikan sebagai bermasalah, bunga yang telah diakui tetapi belum ditagih akan dibatalkan pengakuannya. Selanjutnya bunga yang dibatalkan tersebut diakui sebagai tagihan kontinjensi.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

y. Interest income and expense (continued)

The effective interest rate method is a method of calculating the amortised cost of a financial asset or a financial liability and method of allocating the interest income or interest expense over the relevant period.

The effective interest rate is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial instrument or, when appropriate, a shorter period to the net carrying amount of the financial asset or financial liability. When calculating the effective interest rate, Bank estimates cash flows considering all contractual terms of the financial instrument, but does not consider future credit losses. The calculation includes all fees, commissions, and other fees paid or received between parties to the contract that are an integral part of the effective interest rate, transaction costs, and all other premiums or discounts.

Once a financial asset or a bank of similar financial assets has been written down as a result of an impairment loss, interest income is recognised on the unimpaired portion using the rate of interest used to discount the future cash flows for the purpose of measuring the impairment loss.

Interest income on loans or other earning assets classified as non-performing is recognised at the time the interest is received. When a financial asset is classified as non-performing, any interest income previously recognised but not yet collected is reversed against interest income. The reversed interest income is recognised as a contingent receivable.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

z. Pendapatan provisi dan komisi

Provisi dan komisi yang berkaitan langsung dengan kegiatan pemberian pinjaman diakui sebagai bagian/(pengurang) dari biaya perolehan pinjaman dan akan diakui sebagai pendapatan bunga dengan cara diamortisasi berdasarkan metode suku bunga efektif.

Pendapatan provisi dan komisi yang tidak berkaitan dengan kegiatan pemberian pinjaman atas suatu jangka waktu diakui sebagai pendapatan pada saat terjadinya transaksi sebagai pendapatan operasional lainnya.

aa. Pendapatan dan beban operasional lainnya

Beban tenaga kerja

Beban tenaga kerja meliputi beban berupa gaji karyawan, bonus, lembur dan tunjangan.

Beban umum dan administrasi

Beban umum dan administrasi merupakan beban yang timbul sehubungan dengan aktivitas kantor dan operasional Bank.

Seluruh pendapatan dan beban yang terjadi dibebankan sebagai laba/rugi pada saat terjadinya.

ab. Perpajakan

Beban pajak terdiri dari pajak kini dan pajak tangguhan. Pajak diakui dalam laporan laba rugi, kecuali jika pajak tersebut terkait dengan transaksi atau kejadian yang langsung diakui di pendapatan komprehensif lain atau langsung diakui ke ekuitas. Dalam hal ini, pajak tersebut masing-masing diakui dalam pendapatan komprehensif lain atau ekuitas.

Manajemen secara periodik mengevaluasi posisi yang dilaporkan di Surat Pemberitahuan Tahunan ("SPT") sehubungan dengan situasi dimana aturan pajak yang berbeda membutuhkan interpretasi. Jika perlu, manajemen menentukan provisi berdasarkan jumlah yang diharapkan akan dibayar kepada otoritas pajak.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

z. Fees and commissions income

Fees and commissions income directly related to lending activities, are recognised as a part/(deduction) of lending cost and will be recognised as interest income by amortising the carrying value of loan with effective interest rate method.

Fees and commissions income which are not related to lending activities on a specific period are recognised as income incurred at the transaction date as other operating income.

aa. Other operating income and expenses

Personnel expenses

Personnel expenses include expenses related with salaries for employees, bonuses, overtime and allowances.

General and administrative expenses

General and administrative expenses represent expenses related to office activities and Bank operational activities.

All of these income and expenses are recorded as profit/loss when incurred.

ab. Taxation

The tax expense comprises of current and deferred tax. Tax is recognised in the profit or loss, except to the extent that it relates to items recognised directly in other comprehensive income or in equity. In this case, the tax is also recognised in other comprehensive income or in equity, respectively.

Management periodically evaluates positions takes in tax return with respect to situations in which applicable tax regulation is subject to interpretation. It establishes provision where appropriate, on the basis of amounts expected to be paid to the tax authorities.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

ab. Perpajakan (lanjutan)

Pajak penghasilan tangguhan disajikan dengan menggunakan metode liabilitas. Pajak penghasilan tangguhan timbul akibat perbedaan temporer antara aset dan liabilitas menurut ketentuan-ketentuan pajak dengan nilai tercatat aset dan liabilitas dalam laporan keuangan. Tarif pajak yang berlaku atau yang secara substansial telah berlaku digunakan dalam menentukan besarnya jumlah pajak penghasilan tangguhan.

Aset pajak tangguhan diakui apabila terdapat kemungkinan besar bahwa jumlah laba fiskal di masa mendatang akan memadai untuk mengkompensasi perbedaan temporer yang menimbulkan aset pajak tangguhan tersebut. Aset dan liabilitas pajak penghasilan tangguhan dapat saling hapus apabila terdapat hak yang berkekuatan hukum untuk melakukan saling hapus antara aset pajak kini dengan liabilitas pajak kini dan apabila aset dan pajak penghasilan tangguhan dikenakan oleh otoritas perpajakan yang sama dan adanya niat untuk melakukan penyelesaian saldo secara bersih.

Taksiran pajak penghasilan Bank dihitung untuk masing-masing perusahaan sebagai badan hukum terpisah. Aset pajak kini dan liabilitas pajak kini untuk badan hukum yang berbeda tidak disalinghapuskan dalam laporan keuangan.

ac. Imbalan kerja

Imbalan kerja jangka pendek

Imbalan kerja jangka pendek diakui pada saat terutang kepada karyawan.

Liabilitas imbalan kerja karyawan

Bank memiliki program pensiun sesuai dengan peraturan dan perundang-undangan yang berhubungan dengan ketenagakerjaan atau kebijakan yang ditetapkan oleh Bank. Program ini pada umumnya didanai melalui pembayaran kepada pengelola dana pensiun yang besarnya ditentukan dalam perhitungan aktuarial yang dilakukan secara berkala.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

ab. Taxation (continued)

Deferred income tax is provided using the liability method. Deferred income tax on temporary differences arising between the tax base of assets and liabilities and their carrying amounts in the financial statements. Currently enacted or substantially enacted tax rates are used in the determination of deferred income tax.

Deferred tax assets are recognised to the extent that it is probable that future taxable profit will be available against which the temporary differences can be utilised. Deferred Income tax assets and liabilities are offset when there is a legally enforceable right to offset current tax assets against current tax liabilities and when deferred income taxes assets and liabilities relate to income taxes levied by the same taxation authority where tax is an intention to settle the balance on a net basis.

The estimated corporate income tax of Bank is calculated for each company as a separate legal entity. Current tax assets and current tax liabilities for different legal entities cannot be net-off in the financial statements.

ac. Employee benefits

Short term employee benefits

Short term employee benefits are recognised when they are accrued to the employees.

Employee benefits obligation

The Bank have pension scheme in accordance with prevailing labor-related laws and regulations of Bank's policies. The scheme is generally funded through payments to trustee-administered funds as determined by periodic actuarial calculations.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

ac. Imbalan kerja (lanjutan)

Liabilitas imbalan kerja karyawan (lanjutan)

Bank harus menyediakan program pensiun dengan jumlah minimal tertentu sesuai dengan UU Cipta Kerja No. 11/2020 (2020: Undang-Undang (UU) Ketenagakerjaan No. 13/2003). Karena Undang-Undang Ketenagakerjaan menentukan rumus tertentu untuk menghitung jumlah minimal imbalan pensiun, maka pada dasarnya program pensiun berdasarkan Undang-Undang Ketenagakerjaan adalah program manfaat pasti. Program pensiun manfaat pasti adalah program pensiun yang menentukan jumlah imbalan pensiun yang akan diberikan, biasanya didasarkan pada satu faktor atau lebih seperti usia, masa kerja atau jumlah kompensasi.

Liabilitas diakui pada laporan posisi keuangan sebesar nilai kini kewajiban imbalan pasti pada akhir periode pelaporan dikurangi nilai wajar aset program. Kewajiban imbalan pasti dihitung setiap tahun oleh aktuaris yang independen dengan menggunakan metode *projected unit credit*. Nilai kini kewajiban imbalan pasti ditentukan dengan mendiskontokan arus kas keluar yang diestimasi dengan menggunakan tingkat bunga Obligasi Pemerintah (dikarenakan saat ini tidak ada pasar aktif untuk obligasi perusahaan yang berkualitas tinggi) yang didenominasikan dalam Rupiah dimana imbalan akan dibayarkan dan memiliki jangka waktu jatuh tempo mendekati jangka waktu kewajiban pensiun.

Keuntungan dan kerugian aktuarial yang timbul dari penyesuaian dan perubahan dalam asumsi-asumsi aktuarial langsung diakui seluruhnya melalui pendapatan komprehensif lainnya pada saat terjadinya.

Biaya jasa lalu diakui segera dalam laporan laba rugi. Keuntungan dan kerugian dari kurtailmen atau penyelesaian program manfaat pasti diakui di laba rugi ketika kurtailmen atau penyelesaian tersebut terjadi.

Pesangon pemutusan kontrak terhutang ketika karyawan diberhentikan sebelum usia pensiun normal.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

ac. Employee benefits (continued)

Employee benefits obligation (continued)

The Bank are required to provide a minimum amount of pension benefits in accordance with Job Creation Law Art No.11/2020 (2020: Labor Law No. 13/2003). Since the Labor Law sets the formula for determining the minimum amount of benefits, in substance pension plans under the Labor Law represent defined benefit plans. A defined benefit plan is a pension plan that defines an amount of pension benefit to be provided, usually as a function of one or more factors such as age, years of service or total compensation.

The liability recognised in the statement of financial position is the present value of the defined benefit obligation at the end of the reporting period less the fair value of plan assets. The defined benefit obligation is calculated annually by independent actuaries using the projected unit credit method. The present value of the defined benefit obligation is determined by discounting the estimated future cash outflows using interest rates of Government Bonds (considering currently there is no active market for high-quality corporate bonds) that are denominated in Rupiah in which the benefits will be paid, and that have terms to maturity approximating to the terms of the related pension obligation.

Actuarial gains and losses arising from experience adjustments and changes inactuarial assumptions charged or credited to equity in other comprehensive income in the period in which they arise.

Past-service costs are recognised immediately in the statements of profit or loss. Gains or losses on the curtailment or settlement of a defined benefit plan are recognised in the statement of profit or loss when the curtailment or settlement occurs.

Termination benefits are payable whenever an employee's employment is terminated before the normal retirement age.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

ac. Imbalan kerja (lanjutan)

Liabilitas imbalan kerja karyawan (lanjutan)

Bank mengakui pesangon pemutusan kontrak kerja ketika Bank menunjukkan komitmennya untuk memutuskan hubungan kerja dengan karyawan berdasarkan suatu rencana formal terperinci yang kecil kemungkinannya untuk dibatalkan. Pesangon yang akan dibayarkan dalam waktu lebih dari 12 (dua belas) bulan setelah tanggal laporan posisi keuangan didiskontokan untuk mencerminkan nilai kini.

ad. Laba per saham

Laba per saham dasar dihitung dengan membagi laba bersih dengan rata-rata tertimbang jumlah saham biasa yang beredar pada periode yang bersangkutan.

Laba per saham dilusian dihitung dengan membagi laba bersih dengan rata-rata tertimbang jumlah saham yang beredar ditambah dengan rata-rata tertimbang jumlah saham yang akan diterbitkan atas konversi efek yang berpotensi saham yang bersifat dilutif.

ae. Penjabaran mata uang asing

Laporan keuangan disajikan dalam mata uang Rupiah, yang merupakan mata uang fungsional dan penyajian Bank. Transaksi dalam mata uang asing dijabarkan ke mata uang Rupiah dengan menggunakan kurs yang berlaku pada tanggal transaksi tersebut. Pada setiap tanggal pelaporan, aset dan liabilitas moneter dalam mata uang asing dijabarkan ke mata uang Rupiah dengan kurs penutupan Bank Indonesia pada pukul 16:00 Waktu Indonesia Barat yang berlaku pada tanggal pelaporan.

Keuntungan dan kerugian selisih kurs yang timbul dari transaksi dalam mata uang asing dan penjabaran aset dan kewajiban moneter dalam mata uang asing, diakui dalam laporan laba rugi.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

ac. Employee benefits (continued)

Employee benefits obligation (continued)

The Bank recognise termination benefits when it is demonstrably committed to terminate the employment of current employees according to a detailed formal plan which has small probability to withdraw. Benefits, due more than 12 (twelve) months after statement of financial position's date are discounted to present value.

ad. Earnings per share

Basic earnings per share is computed by dividing net income with the weighted average number of common shares outstanding during the period.

Diluted earnings per share is calculated by dividing net income by the weighted average number of shares outstanding plus the weighted average number of shares outstanding which would be issued on the conversion of the dilutive potential shares.

ae. Foreign currency translation

The financial statements are presented in Rupiah, which is the functional and presentation currency of the Bank. Transactions denominated in a foreign currency are converted into Rupiah at the exchange rate prevailing at the date of the transaction. As at each reporting date, monetary assets and liabilities in foreign currencies are translated into Rupiah using the Bank Indonesia closing exchange rate at 16:00 Western Indonesian Time prevailing at reporting date.

Exchange gains and losses arising on transactions in foreign currencies and on the translation of foreign currency monetary assets and liabilities are recognised in the statement of profit or loss.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

ae. Penjabaran mata uang asing (lanjutan)

Berikut ini adalah kurs mata uang asing utama yang digunakan pada tanggal 31 Desember 2024 dan 2023 yang menggunakan kurs tengah Reuters pukul 16:00 Waktu Indonesia Barat (nilai penuh):

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

ae. Foreign currency translation (continued)

Below are the major exchange rates used as of December 31, 2024 and 2023 using the Reuter's middle rates at 16:00 Western Indonesian Time (full amount):

	31 Desember/*December 31*,		
	2024	**2023**	
Poundsterling Inggris	20.219	19.627	*Great Britain Poundsterling*
Franc Swiss	17.815	18.299	*Swiss Franc*
Euro Eropa	16.758	17.038	*European Euro*
Dolar Amerika Serikat	16.095	15.397	*United States Dollar*
Dolar Singapura	11.845	11.676	*Singapore Dollar*
Dolar Kanada	11.202	11.630	*Canadian Dollar*
Dolar Australia	10.014	10.521	*Australian Dollar*
Dolar New Zealand	9.068	9.766	*New Zealand Dollar*
Riyal Arab	4.284	4.106	*Saudi Riyal*
Ringgit Malaysia	3.598	3.355	*Malaysian Ringgit*
Yuan China	2.205	2.170	*Chinese Yuan*
Dolar Hongkong	2.073	1.971	*Hongkong Dollar*
Dolar Taiwan	491	504	*New Taiwan Dollar*
Baht Thailand	470	450	*Thailand Baht*
Yen Jepang	103	109	*Japanese Yen*
Won Korea	11	12	*Korean Won*

af. Transaksi dengan pihak berelasi

Bank melakukan transaksi dengan pihak berelasi. Sesuai dengan PSAK 224 (dahulu PSAK 7) tentang "Pengungkapan Pihak-pihak yang Berelasi", yang dimaksud dengan pihak yang berelasi adalah orang atau entitas yang berelasi dengan entitas pelapor sebagai berikut:

a. Orang atau anggota keluarga terdekatnya berelasi dengan entitas pelapor jika orang tersebut:
   i. memiliki pengendalian atau pengendalian bersama terhadap entitas pelapor;
   ii. memiliki pengaruh signifikan terhadap entitas pelapor; atau
   iii. personal manajemen kunci entitas pelapor atau entitas induk pelapor.

af. Transactions with related parties

The Bank has transactions with related parties. In accordance with SFAS 224 (previously SFAS 7) regarding "Related Party Disclosure", the meaning of a related party is a person or entity that is related to a reporting entity as follow:

a. A person or a close member of that person's family is related to a reporting entity if:
   i. has control or joint control over the reporting entity;
   ii. has significant influence over the reporting entity; or
   iii. is member of the key management personnel of the reporting entity or a parent of the reporting entity.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

af. Transaksi dengan pihak berelasi (lanjutan)

Bank melakukan transaksi dengan pihak berelasi. Sesuai dengan PSAK 224 (dahulu PSAK 7) tentang "Pengungkapan Pihak-pihak yang Berelasi", yang dimaksud dengan pihak yang berelasi adalah orang atau entitas yang berelasi dengan entitas pelapor sebagai berikut:

b. Suatu entitas berelasi dengan entitas pelapor jika memenuhi hal-hal sebagai berikut:
   i. entitas dan entitas pelapor adalah anggota dari kelompok usaha yang sama (artinya entitas induk, entitas anak, dan entitas anak berikutnya terkait dengan entitas lain);
   ii. suatu entitas adalah entitas asosiasi atau ventura bersama bagi entitas lain (atau entitas asosiasi atau ventura bersama yang merupakan anggota suatu kelompok usaha, di mana entitas lain tersebut adalah anggotanya);
   iii. kedua entitas tersebut adalah ventura bersama dari pihak ketiga yang sama;
   iv. suatu entitas adalah ventura bersama dari entitas ketiga dan entitas yang lain adalah entitas asosiasi dari entitas ketiga;
   v. entitas tersebut adalah suatu program imbalan pasca kerja untuk imbalan kerja dari suatu entitas pelapor atau entitas yang terkait dengan entitas pelapor;
   vi. entitas yang dikendalikan atau dikendalikan bersama oleh orang yang diidentifikasi dalam butir (a); atau
   vii. orang yang diidentifikasi, dalam butir (a) (i) memiliki pengaruh signifikan terhadap entitas atau anggota manajemen kunci entitas (atau entitas induk dari entitas).

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

af. Transactions with related parties (continued)

The Bank has transactions with related parties. In accordance with SFAS 224 (previously SFAS 7) regarding "Related Party Disclosure", the meaning of a related party is a person or entity that is related to a reporting entity as follow:

b. An entity is related to a reporting entity if any of the following conditions applies:
   i. the entity and the reporting entity are member of the same the company (which means that each parent, subsidiary, and fellow subsidiary is related to the others);
   ii. one entity is an associate or joint venture of the other entity (or an associate or joint venture of member of a company of which the other entity is a member);
   iii. both entities are joint ventures of the same third party;
   iv. one entity is a joint venture of a third entity and the other entity is an associate of the third entity;
   v. the entity is a post-employment benefit plan for the benefit of employees of either the reporting entity or an entity related to the reporting entity;
   vi. the entity controlled or jointly controlled by a person identified in (a); or
   vii. a person identified in (a) (i) has significant influence over the entity or is a member of the key management personnel of the entity (or of a parent of the entity).

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

ag. Pelaporan segmen

Sebuah segmen operasi adalah suatu komponen dari entitas:
a. yang terlibat dalam aktivitas bisnis yang memperoleh pendapatan dan menimbulkan beban (termasuk pendapatan dan beban yang terkait dengan transaksi dengan komponen lain dari entitas yang sama);
b. hasil operasinya dikaji ulang secara reguler oleh kepala operasional untuk membuat keputusan tentang sumber daya yang dialokasikan pada segmen tersebut dan menilai kinerjanya; dan
c. tersedia informasi keuangan yang dapat dipisahkan.

Bank menyajikan segmen operasi berdasarkan informasi yang disiapkan secara internal untuk pengambil keputusan operasional. Berdasarkan PSAK 108 (dahulu PSAK 5), sebuah segmen usaha adalah sekelompok aset dan operasi yang menyediakan barang atau jasa yang memiliki risiko serta tingkat pengembalian yang berbeda dengan segmen usaha lainnya.

Segmen geografis adalah komponen Bank yang dapat dibedakan dalam menghasilkan jasa pada lingkungan (wilayah) ekonomi tertentu dan komponen itu memiliki risiko dan imbalan yang berbeda dengan risiko dan imbalan pada komponen yang beroperasi pada lingkungan (wilayah) ekonomi lain. Bank melaporkan segmen geografis berdasarkan daerah Jadetabek, Jawa Barat, Jawa Tengah dan Jawa Timur dan Luar Jawa.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

ag. Segment reporting

An operating segment is a component of entity which:
a. involves with business activities to generate income and expenses (include income and expenses relating to the transactions with other components with the same entity);
b. operations result is observed regularly by chief decision maker to make decisions regarding the allocation of resources and to evaluate the works; and
c. separated financial information is available.

Bank presents operating segments based on the information that internally is provided to the chief operating decision maker. Under SFAS 108 (previously SFAS 5), a business segment is a bank of assets and operations engaged in providing products or services that are subject to risks and returns that are difference from those of other business segments.

A geographical segment is a distinguishable component of the Bank that is engaged in providing services within a particular economic environment and that is subject to risks and returns that are different from those operating in other economic environments. The Bank report geographical segment information based on Jadetabek, West Java, Central and East Java and Non Java.

3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN AKUNTANSI YANG PENTING

Beberapa estimasi dan asumsi dibuat dalam rangka penyusunan laporan keuangan dimana dibutuhkan pertimbangan manajemen dalam menentukan metodologi yang tepat untuk penilaian aset dan liabilitas.

Manajemen membuat estimasi dan asumsi yang berimplikasi pada pelaporan nilai aset dan liabilitas atas tahun keuangan satu tahun kedepan. Semua estimasi dan asumsi yang diharuskan oleh PSAK adalah estimasi terbaik yang didasarkan standar yang berlaku. Estimasi dan pertimbangan dievaluasi secara terus menerus dan berdasarkan pengalaman masa lalu dan faktor-faktor lain termasuk harapan atas kejadian yang akan datang.

3. USE OF SIGNIFICANT ACCOUNTING ESTIMATES AND JUDGEMENTS

Certain estimates and assumption are made in the presentation of the financial statements. These often require management judgement in determining the appropriate methodology for valuation of assets and liabilities.

Management makes estimates and assumptions that affect the reported amounts of assets and liabilities within the next financial year. All estimates and assumptions required in conformity with SFAS are best estimates undertaken in accordance with the applicable standard. Estimates and judgements are evaluated on a continuous basis, and are based on past experience and other factors, including expectations with regard to future events.

3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN AKUNTANSI YANG PENTING (lanjutan)

Walaupun estimasi dan asumsi ini dibuat berdasarkan pengetahuan terbaik manajemen atas kejadian dan tindakan saat ini, hasil yang timbul mungkin berbeda dengan estimasi dan asumsi semula.

Cadangan kerugian penurunan nilai aset keuangan

Sesuai dengan PSAK 109 (dahulu PSAK 71), pengukuran cadangan kerugian penurunan nilai aset keuangan yang diukur pada biaya perolehan diamortisasi dan diukur pada nilai wajar melalui penghasilan komprehensif lain membutuhkan penggunaan model yang kompleks dan asumsi signifikan terkait *future economic conditions* dan *credit behavior.*

Estimasi signifikan dibutuhkan dalam menerapkan perhitungan cadangan kerugian penurunan nilai berdasarkan PSAK 109 (dahulu PSAK 71), antara lain:

- Penentuan kriteria *significant increase in Credit Risk*:
- Menentukan model yang tepat dan asumsi untuk perhitungan cadangan kerugian penurunan nilai;
- Menentukan jumlah dan pembebanan relatif atas skenario *forward-looking* untuk masing-masing segmen/produk;
- Menentukan segmentasi aset keuangan yang sejenis untuk perhitungan cadangan kerugian penurunan nilai;
- Estimasi arus kas debitur dalam perhitungan individual *impairment*.

Lihat Catatan 2g untuk kebijakan akuntansi atas penurunan nilai aset keuangan.

Agunan yang diambil alih

Agunan yang diambil alih diukur sebesar nilai yang lebih rendah antara nilai tercatat dan nilai bersih yang dapat direalisasi. Nilai bersih yang dapat direalisasi adalah nilai wajar agunan yang diambil alih dikurangi dengan estimasi biaya untuk menjual agunan tersebut. Selisih lebih saldo kredit di atas nilai bersih yang dapat direalisasi dari agunan yang diambil alih dibebankan ke dalam akun cadangan kerugian penurunan nilai aset non keuangan.

3. USE OF SIGNIFICANT ACCOUNTING ESTIMATES AND JUDGEMENTS (continued)

Although these estimates and assumption are based on management's best knowledge of current events and activities, actual result may differ from those estimates and assumption.

Allowance for impairment losses of financial assets

According to SFAS 109 (previously SFAS 71), the measurement of the expected credit loss allowance for financial assets measured at amortised cost and at fair value through other comprehensive income is an area that requires the use of complex models and significant assumptions about future economic conditions and credit behavior.

Significant estimates are required in applying the SFAS 109 (previously SFAS 71) requirements for measuring allowance for impairment losses, such as:

- *Determining criteria for significant increase in Credit Risk;*
- *Choosing appropriate models and assumptions for the measurement of allowance for impairment losses;*
- *Establishing the number and relative weightings of forward-looking scenarios for each type of segment/product;*
- *Establishing groups of similar financial assets for the purposes of measuring allowance for impairment losses;*
- *Estimate debtor's cash flow in the calculation of individual impairment.*

Refer to Note 2g for accounting policy on impairment of financial assets.

Foreclosed assets

Foreclosed assets are stated at lower amount of carrying amount and net realisable value.Net realisable value is the fair value of the foreclosed assets less the estimated costs to sell the assets. The excess of loan receivable over the net realisable value of the foreclosed assets is charged to allowance for impairment losses on non financial assets.

3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN AKUNTANSI YANG PENTING (lanjutan)

Agunan yang diambil alih (lanjutan)

Kondisi agunan yang diambil alih dievaluasi secara individu berdasarkan estimasi terbaik manajemen atas nilai kini arus kas yang diharapkan akan diterima. Dalam mengestimasi nilai bersih yang dapat direalisasi tersebut, manajemen membuat pertimbangan berdasarkan nilai realisasi bersih dari setiap agunan berdasarkan hasil penilaian dari penilai independen dan estimasi waktu dan arus kas yang diterima dari penjualan aset tersebut. Setiap aset yang mengalami penurunan nilai dinilai sesuai dengan kondisi, dan strategi penyelesaian serta estimasi arus kas yang diperkirakan dapat diterima.

Imbalan kerja karyawan

Nilai kini atas imbalan kerja karyawan tergantung dari banyaknya faktor yang dipertimbangkan oleh aktuaris berdasarkan beberapa asumsi. Perubahan atas asumsi-asumsi tersebut akan mempengaruhi nilai tercatat atas imbalan kerja karyawan.

Asumsi yang digunakan dalam menentukan biaya atau pendapatan untuk imbalan kerja termasuk tingkat diskonto. Bank menentukan tingkat diskonto yang tepat pada setiap akhir tahun. Ini merupakan tingkat suku bunga yang digunakan untuk menentukan nilai kini atas arus kas masa depan yang diestimasi akan digunakan untuk membayar imbalan kerja. Dalam menentukan tingkat diskonto yang tepat, Bank mempertimbangkan tingkat suku bunga atas Obligasi Pemerintah yang mempunyai jatuh tempo yang menyerupai jangka waktu imbalan kerja karyawan.

Asumsi kunci liabilitas pensiun lainnya sebagian ditentukan berdasarkan kondisi pasar saat ini (lihat Catatan 24).

Penentuan nilai wajar

Dalam menentukan nilai wajar atas aset keuangan dan liabilitas keuangan dimana tidak terdapat harga pasar yang dapat diobservasi, Bank harus menggunakan teknik penilaian seperti dijelaskan pada Catatan 2d.

Informasi mengenai penentuan nilai wajar dari instrumen keuangan diungkapkan pada Catatan 45.

Dalam mengukur nilai wajar atas aset dan liabilitas non-keuangan, Bank menggunakan data pasar yang dapat diobservasi jika memungkinkan.

3. USE OF SIGNIFICANT ACCOUNTING ESTIMATES AND JUDGEMENTS (continued)

Foreclosed assets (continued)

The specific condition of foreclosed assets is individually evaluated based on management's best estimate of the present value of the expected cash flows to be received. In estimating these cash flows, management makes judgements about the net realisable value of each foreclosed asset based the result of independent appraisal and estimated time and cash received from selling the foreclosed assets. Each impaired assets will be measured based on its merits, and the workout strategy and estimated cash flows considered recoverable.

Employee benefit

The present value of the employee benefit obligations depends on a number of factors that are determined on an actuarial basis using a number of assumptions. Any changes in these assumptions will impact the carrying amount of employee benefit obligations.

The assumptions used in determining the net cost (income) for employee benefits include the discount rate. The Bank determines the appropriate discount rate at the end of each year. This is the interest rate that should be used to determine the present value of estimated future cash outflows expected to be required to settle the pension obligations. In determining the appropriate discount rate, the Bank considers the interest rates of Government Bonds that have terms to maturity approximating the terms of the related employee benefit liability.

Other key assumptions for pension obligations are partly based on current market conditions (refer to Note 24).

Determining fair values

The determining of fair value for financial assets and financial liabilities for which there is no observable market price requires the Bank must use of valuation techniques as described in Note 2d.

Information about the determination of fair value of financial instruments is disclosed in Note 45.

When measuring the fair value for non-financial assets and liabilities, the Bank uses observable market data to extent possible.

3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN AKUNTANSI YANG PENTING (lanjutan)

Perpajakan

Pertimbangan signifikan dilakukan dalam menentukan provisi atas pajak penghasilan badan dan pajak lainnya. Terdapat transaksi dan perhitungan tertentu yang penentuan pajak akhirnya adalah tidak pasti dalam kegiatan usaha normal. Bank mengakui liabilitas pajak penghasilan badan dan pajak lainnya berdasarkan estimasi apakah akan terdapat tambahan pajak penghasilan badan dan pajak lainnya.

Aset Pajak Tangguhan

Aset pajak tangguhan diakui atas seluruh perbedaan temporer yang dapat dikurangkan, sepanjang besar kemungkinannya bahwa penghasilan kena pajak akan tersedia sehingga perbedaan temporer tersebut dapat digunakan. Estimasi signifikan oleh manajemen disyaratkan dalam menentukan jumlah aset pajak tangguhan yang dapat diakui, berdasarkan saat penggunaan dan tingkat penghasilan kena pajak serta strategi perencanaan pajak masa depan.

Menentukan jangka waktu kontrak dengan opsi perpanjangan dan penghentian kontrak - Bank sebagai *lessee*

Bank menentukan jangka waktu sewa sebagai jangka waktu sewa yang tidak dapat dibatalkan, bersama dengan periode yang dicakup oleh opsi untuk memperpanjang masa sewa jika dipastikan akan dilaksanakan, atau periode apa pun yang dicakup oleh opsi untuk menghentikan sewa, jika cukup wajar untuk tidak dilakukan.

Bank memiliki beberapa kontrak sewa yang mencakup opsi perpanjangan dan penghentian jangka waktu sewa. Bank menerapkan penilaian dalam mengevaluasi apakah dapat dipastikan jika akan menggunakan opsi untuk memperpanjang atau menghentikan sewa. Hal tersebut dilakukan dengan mempertimbangkan seluruh fakta dan keadaan yang relevan yang memberikan insentif ekonomi untuk melakukan perpanjangan atau penghentian sewa. Setelah tanggal dimulainya, Bank menilai kembali masa sewa, jika terdapat peristiwa atau perubahan signifikan dalam keadaan yang berada dalam kendali dan mempengaruhi apakah *lessee* cukup pasti untuk mengeksekusi opsi memperpanjang atau menghentikan sewa.

3. USE OF SIGNIFICANT ACCOUNTING ESTIMATES AND JUDGEMENTS (continued)

Taxation

Significant consideration is made in determining the provision of corporate income tax and other taxes. There are certain transactions and calculations that the final tax determination is uncertain in the normal course of business. The Bank recognised liability for corporate income tax and other taxes based on an estimate whether there would be an additional corporate income tax and other taxes.

Deferred tax assets

Deferred tax assets are recognised for all deductible temporary differences, as long as it is likely that taxable income will be available so that the temporary differences can be utilised. Significant estimates by management are required in determining the amount of deferred tax assets that can be recognised, based on utilisation and the level of taxable income and future tax planning strategies.

Determine the contract term with options for extension and termination of the contract - the Bank as lessee

The Bank determines the lease term as the term of the lease that cannot be cancelled, together with the period covered by the option to extend the lease if it is determined to be exercised, or any period covered by the option to terminate the lease, if it is reasonably reasonable not to do so.

The Bank has several lease contracts that include options for extension and termination of the lease terms. The Bank applies its judgment in evaluating whether it is certain to exercise the option to extend or terminate the lease. This is done by considering all relevant facts and circumstances that provide economic incentives to extend or terminate the lease. After the commencement date, the Bank reassesses the lease term, if there is a significant event or change in circumstances which is under its control and affects whether the lessee is certain enough to exercise the option to extend or terminate the lease.

4. KAS / *4. CASH*

	31 Desember/*December 31*, 2024	2023	
Kas dalam khasanah			*Cash in vault*
Rupiah	41.558.149	87.502.996	*Rupiah*
Mata uang asing			*Foreign currency*
Dolar Amerika Serikat	28.827.126	4.394.381	*United States Dollar*
Euro Eropa	580.753	25.302	*European Euro*
Dolar Singapura	215.678	554.825	*Singapore Dollar*
Franc Swiss	89.610	7.869	*Swiss Franc*
Dolar Kanada	59.929	581	*Canadian Dollar*
Dolar Selandia Baru	57.944	22.851	*New Zealand Dollar*
Dolar Australia	54.073	171.699	*Australian Dollar*
Poundsterling Inggris	37.303	26.300	*Great Britain Poundsterling*
Yen Jepang	17.515	4.682	*Japanese Yen*
Baht Thailand	3.758	571	*Thailand Baht*
Yuan Cina	3.418	2.341	*Chinese Yuan*
Dolar Taiwan	2.602	7.704	*New Taiwan Dollar*
Won Korea	1.638	1.497	*Korean Won*
Ringgit Malaysia	1.079	436	*Malaysian Ringgit*
Dolar Hongkong	187	5.892	*Hongkong Dollar*
Real Saudi	-	1.437	*Saudi Riyal*
Kas	89.500	89.500	*Cash on hand*
Jumlah	**71.600.262**	**92.820.864**	***Total***

Kas dalam khasanah diasuransikan terhadap seluruh risiko kepada PT Victoria Insurance (pihak berelasi) dengan nilai pertanggungan seluruhnya pada tanggal 31 Desember 2024 dan 2023 masing-masing sebesar Rp129.906.941 dan Rp125.921.618. Manajemen Bank berpendapat bahwa nilai pertanggungan tersebut telah memadai untuk menutup kemungkinan kerugian atas kas dalam khasanah yang dipertanggungkan.

Cash in vault, are insured against losses by all risks to PT Victoria Insurance (related party) with total insurance coverage as of December 31, 2024 and 2023 amounting to Rp129,906,941 and Rp125,921,618, respectively. The Bank's management believe that the insurance coverage is adequate to cover possible losses on insured cash in vault.

5. GIRO PADA BANK INDONESIA / *5. CURRENT ACCOUNTS WITH BANK INDONESIA*

	31 Desember/*December 31*, 2024	2023	
Rupiah	1.367.881.186	1.469.773.490	*Rupiah*
Dolar Amerika Serikat	33.171.795	23.303.360	*United States Dollar*
Jumlah	**1.401.052.981**	**1.493.076.850**	***Total***

6. GIRO PADA BANK LAIN / *6. CURRENT ACCOUNTS WITH OTHER BANKS*

a. Berdasarkan bank / *a. By bank*

	31 Desember/*December 31*, 2024	2023	
Rupiah			***Rupiah***
PT Bank Negara Indonesia (Persero) Tbk	20.505.873	20.963.477	*PT Bank Negara Indonesia (Persero) Tbk*
PT Bank Mandiri (Persero) Tbk	10.100.000	10.101.400	*PT Bank Mandiri (Persero) Tbk*
PT Bank Central Asia Tbk	1.003.165	57.345.205	*PT Bank Central Asia Tbk*
PT Bank CIMB Niaga Tbk	682.048	3.769	*PT Bank CIMB Niaga Tbk*
PT Bank Permata Tbk	128.829	174.099	*PT Bank Permata Tbk*
PT Bank Pan Indonesia Tbk	6.820	8.318	*PT Bank Pan Indonesia Tbk*
PT Bank HSBC Indonesia	-	57.491	*PT Bank HSBC Indonesia*
PT Bank Maybank Indonesia Tbk	-	31.338	*PT Bank Maybank Indonesia Tbk*
Sub jumlah	**32.426.735**	**88.685.097**	***Sub total***
Mata Uang Asing			***Foreign Currency***
PT Bank Negara Indonesia (Persero) Tbk	40.011.855	164.890.420	*PT Bank Negara Indonesia (Persero) Tbk*
PT Bank Central Asia Tbk	22.452.434	4.651.092	*PT Bank Central Asia Tbk*
PT Bank Mandiri (Persero) Tbk	18.187.642	36.106.642	*PT Bank Mandiri (Persero) Tbk*
PT Bank ICBC Indonesia	784.237	577.714	*PT Bank ICBC Indonesia*
PT Bank CIMB Niaga Tbk	410.691	1.059.270	*PT Bank CIMB Niaga Tbk*
OCBC Bank, Singapura	244.686	328.684	*OCBC Bank, Singapore*
Sub jumlah	**82.091.545**	**207.613.822**	***Sub total***
Jumlah	**114.518.280**	**296.298.919**	***Total***
Dikurangi: Cadangan Kerugian Penurunan Nilai	(44.983)	(1.726)	*Less: Allowance for impairment losses*
Jumlah - bersih	**114.473.297**	**296.297.193**	***Total - net***

Seluruh giro pada bank lain pada tanggal 31 Desember 2024 dan 2023 ditempatkan pada pihak ketiga dan tidak terdapat giro pada bank lain yang dijaminkan.

All current accounts with other banks as of December 31, 2024 and 2023 were placed with third parties and are not pledged as collateral.

b. Berdasarkan mata uang / *b. By currency*

	31 Desember/*December 31*, 2024	2023	
Rupiah	32.426.735	88.685.097	*Rupiah*
Dolar Amerika Serikat	76.934.918	202.908.447	*United States Dollar*
Yen Jepang	3.649.952	2.673.710	*Japanese Yen*
China Yuan	851.297	643.711	*Chinese Yuan*
Euro Eropa	410.691	1.059.270	*European Euro*
Dolar Singapura	244.687	328.684	*Singapore Dollar*
Jumlah	**114.518.280**	**296.298.919**	***Total***
Dikurangi: Cadangan Kerugian Penurunan Nilai	(44.983)	(1.726)	*Less: Allowance for impairment losses*
Jumlah - bersih	**114.473.297**	**296.297.193**	***Total - net***

6. GIRO PADA BANK LAIN (lanjutan)

c. Cadangan kerugian penurunan nilai

Pada tanggal 31 Desember 2024 dan 2023, seluruh giro pada bank lain berada di *stage* 1. Bank telah membentuk cadangan kerugian penurunan nilai masing-masing sebesar Rp44.983 dan Rp1.726.

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai di atas telah memadai.

6. CURRENT ACCOUNTS WITH OTHER BANKS (continued)

c. Allowance for impairment losses

As of December 31, 2024 and 2023, all current accounts with other banks are classified in stage 1. Bank has set aside allowance for impairment losses amounted to Rp44,983 and Rp1,726, respectively.

Management believes that the above allowance for impairment losses is adequate.

7. PENEMPATAN PADA BANK INDONESIA DAN BANK LAIN

a. Berdasarkan jenis, pihak dan bank

7. PLACEMENTS WITH BANK INDONESIA AND OTHER BANKS

a. By type, counterparties and bank

	31 Desember/*December 31*,		
	2024	**2023**	
Pihak ketiga			***Third party***
Fasilitas Simpanan			*Fasilitas Simpanan*
Bank Indonesia (FASBI)	-	359.947.530	*Bank Indonesia (FASBI)*
Deposito Berjangka			*Time Deposit*
PT Bank DKI	11.000.000	-	*PT Bank DKI*
PT Bank KB Bukopin Syariah	1.200.000	-	*PT Bank KB Bukopin Syariah*
PT Bank Mega Tbk	-	2.600.000	*PT Bank Mega Tbk*
PT Bank Victoria Syariah	-	1.800.000	*PT Bank Victoria Syariah*
PT Bank Nationalnobu Tbk	-	1.320.000	*PT Bank Nationalnobu Tbk*
PT Bank BJB Tbk	-	700.000	*PT Bank BJB Tbk*
	12.200.000	**366.367.530**	
Interbank Call Money			*Interbank Call Money*
PT Bank Capital Indonesia Tbk	-	250.000.000	*PT Bank Capital Indonesia Tbk*
PT Bank Victoria Syariah	-	150.000.000	*PT Bank Victoria Syariah*
PT Bank Pembangunan Daerah Papua	-	100.000.000	*PT Bank Pembangunan Daerah Papua*
PT Bank Nationalnobu Tbk	-	50.000.000	*PT Bank Nationalnobu Tbk*
	-	**550.000.000**	
Jumlah	**12.200.000**	**916.367.530**	***Total***
Dikurangi: Cadangan Kerugian Penurunan Nilai	(2.745)	(998.782)	*Less: Allowance for impairment losses*
Jumlah - bersih	**12.197.255**	**915.368.748**	***Total - net***

7. PENEMPATAN PADA BANK INDONESIA DAN BANK LAIN (lanjutan)

a. Berdasarkan jenis, pihak dan bank (lanjutan)

Pada tanggal 31 Desember 2024 dan 2023, tidak terdapat penempatan pada Bank Indonesia dan bank lain yang dijaminkan.

7. PLACEMENTS WITH BANK INDONESIA AND OTHER BANKS (continued)

a. By type, counterparties and bank (continued)

As of December 31, 2024 and 2023, there are no placements with Bank Indonesia and other banks pledged as collateral.

b. Berdasarkan tenor jatuh tempo / *b. By period maturity*

	31 Desember/*December 31*,		
	2024	**2023**	
Kurang dari 1 bulan	-	916.367.530	*Less than 1 month*
1 sampai 3 bulan	12.200.000	-	*1 up to 3 months*
3 sampai 6 bulan	-	-	*3 up to 6 months*
Lebih dari 6 bulan	-	-	*More than 6 months*
Jumlah	**12.200.000**	**916.367.530**	***Total***
Dikurangi: Cadangan Kerugian Penurunan Nilai	(2.745)	(998.782)	*Less: Allowance for impairment losses*
Jumlah - bersih	**12.197.255**	**915.368.748**	***Total - net***

c. Berdasarkan mata uang / *c. By currency*

	31 Desember/*December 31*,		
	2024	**2023**	
Rupiah	12.200.000	916.367.530	*Rupiah*
Jumlah	**12.200.000**	**916.367.530**	***Total***
Dikurangi: Cadangan Kerugian Penurunan Nilai	(2.745)	(998.782)	*Less: Allowance for impairment losses*
Jumlah - bersih	**12.197.255**	**915.368.748**	***Total - net***

d. Cadangan kerugian penurunan nilai

Pada tanggal 31 Desember 2024 dan 2023 seluruh penempatan pada Bank Indonesia dan bank lain berada di *stage* 1. Bank telah membentuk cadangan kerugian penurunan nilai masing-masing sebesar Rp2.745 dan Rp998.782.

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai di atas telah memadai.

d. Allowance for impairment losses

As of December 31, 2024 and 2023, all placements in Bank Indonesia and other banks are classified in stage 1. Bank has set aside allowance for impairment losses amounted to Rp2,745 and Rp998,782, respectively.

Management believes that the above allowance for impairment losses is adequate.

8. EFEK-EFEK / *8. MARKETABLE SECURITIES*

a. Berdasarkan jenis / *a. By type*

	31 Desember/*December 31*, 2024	2023	
Rupiah			***Rupiah***
Nilai wajar melalui laba rugi			***Fair value through profit or loss***
Obligasi pemerintah	146.629.037	-	*Government bonds*
Reksadana	-	790.570.315	*Mutual funds*
Wesel jangka menengah	-	221.960.000	*Medium-term notes*
Sub jumlah	**146.629.037**	**1.012.530.315**	***Sub total***
Nilai wajar melalui penghasilan komprehensif lain			***Fair value through other comprehensive income***
Surat Utang Negara	1.117.503.740	757.213.466	*Government Promissory Notes*
Reksadana	836.818.168	306.932.232	*Mutual funds*
Surat Berharga Negara	287.857.133	308.245.034	*Government Sharia Bonds*
Obligasi korporasi	204.964.356	12.081.667	*Corporate bonds*
Wesel jangka menengah	203.189.640	-	*Medium-term notes*
Efek Beragun Aset	1.002.379	8.508.012	*Asset-backed security*
Surat Berharga Syariah Korporasi	-	20.283.400	*Corporate Sharia Bonds*
Sub jumlah	**2.651.335.416**	**1.413.263.811**	***Sub total***
Biaya perolehan diamortisasi			***Amortised cost***
Surat Utang Negara	3.239.743.291	3.547.973.017	*Government Promissory Notes*
Sekuritas Rupiah Bank Indonesia (SRBI)	760.504.579	9.389.041	*Bank Indonesia Rupiah Securities (SRBI)*
Obligasi korporasi	571.464.777	196.439.029	*Corporate bonds*
Reksadana	75.952.436	73.000.000	*Mutual funds*
Surat Berharga Syariah Korporasi	16.971.931	16.955.601	*Corporate Sharia Bonds*
Surat Berharga Syariah Negara	1.387.673	1.012.922	*Government Sharia Bonds*
Wesel Jangka Menengah	-	15.000.000	*Medium-term notes*
Sub jumlah	**4.666.024.687**	**3.859.769.610**	***Sub total***
Jumlah	**7.463.989.140**	**6.285.563.736**	***Total***
Dikurangi: Cadangan Kerugian Penurunan Nilai	(1.266.198)	(8.271.969)	*Less: Allowance for impairment losses*
Jumlah - bersih	**7.462.722.942**	**6.277.291.767**	***Total - net***

8. EFEK-EFEK (lanjutan)

a. Berdasarkan jenis (lanjutan)

Pada tanggal 31 Desember 2024 dan 2023, tidak terdapat efek-efek yang dijaminkan.

Pada tanggal 31 Desember 2024 dan 2023, terdapat surat utang negara dalam transaksi efek-efek yang dijual dengan janji untuk dibeli kembali dengan nilai nominal sebesar Rp587.475.014 dan Rp643.266.730 (Catatan 20).

b. Obligasi korporasi

i. Nilai wajar melalui penghasilan komprehensif lain

8. MARKETABLE SECURITIES (continued)

a. By type (continued)

As of December 31, 2024 and 2023, there are no marketable securities pledged as collateral.

As of December 31, 2024 and 2023, there are bonds under transaction securities sold under repurchase agreement with nominal amount of Rp587,475,014 and Rp643,266,730 (Note 20).

b. Corporate bonds

i. Fair value through other comprehensive income

31 Desember/*December 31*, 2024

Pihak penerbit/ *Issuers*	Obligasi/ *Bonds*	Jumlah/ *Amount*	Tingkat suku bunga/ *Interest rate* (%)	Tanggal jatuh tempo/ *Maturity date*	Peringkat/ *Rating*
PT Global Mediacom Tbk	Obligasi Berkelanjutan IV Tahap II Tahun 2024 Seri A	100.319.794	8,75	1-Jul-25	idA+
PT Global Mediacom Tbk	Obligasi Berkelanjutan IV Tahap II Tahun 2024 Seri B	102.623.595	10,25	21-Jul-27	idA+
PT Merdeka Copper Gold Tbk	Obligasi Berkelanjutan IV Tahap IV Tahun 2023 Seri B	2.020.967	9,5	15-Dec-26	idA+
Jumlah/*Total*		**204.964.356**			

31 Desember/*December 31*, 2023

Pihak penerbit/ *Issuers*	Obligasi/ *Bonds*	Jumlah/ *Amount*	Tingkat suku bunga/ *Interest rate* (%)	Tanggal jatuh tempo/ *Maturity date*	Peringkat/ *Rating*
PT Astra Sedaya Finance	Obligasi Berkelanjutan IV/III 2019 C	10.080.856	7,95	23-Oct-24	idAAA
PT Aneka Gas Industri Tbk	Obligasi Berkelanjutan II Tahap IV 2021 A	2.000.811	8,10	22-Dec-24	A(idn)
Jumlah/*Total*		**12.081.667**			

8. EFEK-EFEK (lanjutan) / *8. MARKETABLE SECURITIES (continued)*

b. Obligasi korporasi (lanjutan) / *b. Corporate bonds (continued)*

ii. Biaya perolehan diamortisasi / *ii. Amortised cost*

31 Desember/*December 31,* 2024

Pihak penerbit/ *Issuers*	Obligasi/ *Bonds*	Jumlah/ *Amount*	Tingkat suku bunga/ *Interest rate* (%)	Tanggal jatuh tempo/ *Maturity date*	Peringkat/ *Rating*
PT Barito Pacific Tbk	Obligasi Berkelanjutan III Tahap I Tahun 2023 Seri B	15.000.000	9,25	08-Feb-28	idA+
PT Sarana Multigriya Finansial Tbk (Persero)	Obligasi Berkelanjutan I Tahap IV Tahun 2024	50.000.000	7,00	26-Nov-29	idAAA
PT Sarana Multigriya Finansial Tbk (Persero)	Obligasi Berkelanjutan V Tahap IV Tahun 2020 Seri B	10.074.777	8,10	14-Jul-25	idAAA
PT Sarana Multigriya Finansial Tbk (Persero)	Obligasi Berkelanjutan VII Tahap VII Tahun 2024 Seri C	120.000.000	6,70	26-Nov-27	idAAA
PT Sarana Multi Infrastruktur (Persero)	Obligasi Berkelanjutan IV Tahap II Tahun 2024 Seri B	126.000.000	6,70	06-Des-27	idAAA
PT Sarana Multi Infrastruktur (Persero)	Obligasi Berkelanjutan IV Tahap II Tahun 2024 Seri C	129.890.000	6,95	06-Des-29	idAAA
PT Sinar Mas Multifinance	Obligasi Berkelanjutan III Tahap I Tahun 2023 Seri B	50.000.000	10,25	07-Feb-26	irA+
PT Sinar Mas Multifinance	Obligasi Berkelanjutan III Tahap I Tahun 2023 Seri C	50.000.000	10,75	07-Feb-28	irA+
PT Sejahteraraya Anugrahjaya Tbk	Obligasi I Tahun 2022 Seri A	12.500.000	9,75	07-Okt-25	idA
PT Tbs Energi Utama Tbk	Obligasi I Tahun 2023 Seri B	8.000.000	10,00	03-Mar-28	idA
Jumlah/*Total*		**571.464.777**			

31 Desember/*December 31,* 2023

Pihak penerbit/ *Issuers*	Obligasi/ *Bonds*	Jumlah/ *Amount*	Tingkat suku bunga/ *Interest rate* (%)	Tanggal jatuh tempo/ *Maturity date*	Peringkat/ *Rating*
PT Sinar Mas Multifinance	Obligasi Berkelanjutan III Tahap I Tahun 2023 Seri B	50.000.000	10,25	07-Feb-26	irA+
PT Sinar Mas Multifinance	Obligasi Berkelanjutan III Tahap I Tahun 2023 Seri C	50.000.000	10,75	07-Feb-28	irA+
Lembaga Pembiayaan Ekspor Indonesia	Obligasi Berkelanjutan III Tahap V Tahun 2017 Seri C	20.251.743	8,25	15-Agu-24	idAAA
PT Permodalan Nasional Madani (Persero)	Obligasi Berkelanjutan III Tahap II Tahun 2019 Seri B	20.395.649	8,75	28-Nov-24	idAA+
PT Sarana Multigriya Financial Tbk (Persero)	Obligasi Berkelanjutan V Tahap IV Tahun 2020 Seri B	10.208.721	8,10	14-Jul-25	idAAA
Lembaga Pembiayaan Ekspor Indonesia	Obligasi Berkelanjutan IV Tahap IV Tahun 2019 Seri C	10.082.916	8,90	23-Apr-24	idAAA
PT Barito Pacific Tbk	Obligasi Berkelanjutan III Tahap I Tahun 2023 Seri B	15.000.000	9,25	08-Feb-28	idA+
PT Sejahteraraya Anugrahjaya Tbk	Obligasi I Tahun 2022 Seri A	12.500.000	9,75	07-Okt-25	idA
PT TBS Energi Utama Tbk	Obligasi I Tahun 2023 Seri B	8.000.000	10,00	03-Mar-28	idA
Jumlah/*Total*		**196.439.029**			

c. Berdasarkan sisa umur jatuh tempo / *c. By remaining period to maturity*

	31 Desember/*December 31*, 2024	31 Desember/*December 31*, 2023	
Diukur pada biaya perolehan diamortisasi			***Measured at amortised cost***
Kurang dari 1 tahun	1.235.345.249	731.735.232	*Less than 1 year*
1 sampai dengan 2 tahun	554.020.947	472.679.239	*1 up to 2 years*
2 sampai dengan 5 tahun	1.042.436.401	305.304.379	*2 up to 5 years*
Lebih dari 5 tahun	1.834.222.090	2.350.050.760	*More than 5 years*
Jumlah	**4.666.024.687**	**3.859.769.610**	***Total***

8. EFEK-EFEK (lanjutan)

d. Perubahan cadangan kerugian penurunan nilai

Perubahan cadangan kerugian penurunan nilai efek-efek untuk tahun yang berakhir 31 Desember 2024 dan 2023 adalah sebagai berikut:

8. MARKETABLE SECURITIES (continued)

d. The changes in allowance for impairment losses

The changes in allowance for impairment losses on marketable securities for the year ended December 31, 2024 and 2023 are as follows:

	31 Desember/*December 31,* 2024				
	***Stage* 1**	***Stage* 2**	***Stage* 3**	**Jumlah/ *Total***	
Saldo awal tahun	**8.271.969**	**-**	**-**	**8.271.969**	***Balance beginning of year***
Transfer ke kerugian kredit ekspektasian 12 bulan (*Stage* 1)	-	-	-	-	*Transfer to 12 month expected credit losses (Stage 1)*
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (*Stage 2*)	-	-	-	-	*Transfer to lifetime expected credit losses (Stage 2)*
Transfer ke kredit yang mengalami penurunan nilai (*Stage* 3)	-	-	-	-	*Transfer to credit impaired (Stage 3)*
Perubahan bersih pada eksposur	(7.005.771)	-	-	(7.005.771)	*Net change in exposure*
Penghapusbukuan	-	-	-	-	*Write-off*
Saldo akhir tahun	**1.266.198**	**-**	**-**	**1.266.198**	***Balance end of year***

	31 Desember/*December 31,* 2023				
	***Stage* 1**	***Stage* 2**	***Stage* 3**	**Jumlah/ *Total***	
Saldo awal tahun	**8.862.949**			**8.862.949**	***Balance beginning of year***
Transfer ke kerugian kredit ekspektasian 12 bulan (*Stage 1*)	-	-	-	-	*Transfer to 12 month expected credit losses (Stage 1)*
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (*Stage 2*)	-	-	-	-	*Transfer to lifetime expected credit losses (Stage 2)*
Transfer ke kredit yang mengalami penurunan nilai (*Stage* 3)	-	-	-	-	*Transfer to credit impaired (Stage 3)*
Perubahan bersih pada eksposur	(590.980)	-	-	(590.980)	*Net change in exposure*
Penghapusbukuan	-	-	-	-	*Write-off*
Saldo akhir tahun	**8.271.969**	**-**	**-**	**8.271.969**	***Balance end of year***

8. EFEK-EFEK (lanjutan)

d. Perubahan cadangan kerugian penurunan nilai (lanjutan)

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai di atas telah memadai.

8. MARKETABLE SECURITIES (continued)

d. The changes in allowance for impairment losses (continued)

Management believes that the above allowance for impairment losses is adequate.

9. EFEK-EFEK YANG DIBELI DENGAN JANJI DIJUAL KEMBALI

Efek-efek yang dibeli dengan janji dijual kembali pada tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut:

9. SECURITIES PURCHASED UNDER RESALE AGREEMENTS

The securities purchased under resale agreements as of December 31, 2024 and 2023 are as follows:

31 Desember/*December 31,* 2024

Pihak lawan/ *Counterparty*	Jenis efek/ *Type of Securities*	Nilai wajar/ *Fair value amount*	Tingkat suku bunga/ *Interest rate*	Tanggal dimulai/ *Commencement date*	Tanggal jatuh tempo/ *Maturity date*	Nilai tercatat/ *Carrying amount*
Bank Indonesia	VR0034	96.698.110	6,00%	31 Desember/ *December* 2024	7 Januari/ *January 2025*	98.887.810
Bank Indonesia	VR0034	96.698.110	6,00%	31 Desember/ *December* 2024	7 Januari/ *January 2025*	98.887.810
Jumlah/ *Total*		**193.396.220**				**197.775.620**

31 Desember/*December 31,* 2023

Pihak lawan/ *Counterparty*	Jenis efek/ *Type of Securities*	Nilai wajar/ *Fair value amount*	Tingkat suku bunga/ *Interest rate*	Tanggal dimulai/ *Commencement date*	Tanggal jatuh tempo/ *Maturity date*	Nilai tercatat/ *Carrying amount*
Bank Mega	FR0080	123.206.041	6,35%	22 Desember/ *December* 2023	5 Januari/ *January 2024*	123.385.291
Bank Mega	FR0080	123.206.041	6,35%	22 Desember / *December* 2023	5 Januari / *January 2024*	123.385.291
Bank Mega	FR0080	123.206.041	6,35%	22 Desember / *December* 2023	5 Januari/ *January 2024*	123.385.291
Bank Mega	FR0080	123.206.041	6,35%	22 Desember / *December* 2023	5 Januari/ *January 2024*	123.385.291
Ina Perdana	FR0101	47.035.463	6,25%	28 Desember / *December* 2023	4 Januari / *January 2024*	47.730.463
Ina Perdana	FR0101	94.070.927	6,25%	28 Desember/ *December* 2023	4 Januari/ *January 2024*	95.460.927
Jumlah/ *Total*		**633.930.554**				**636.732.554**

Pada tanggal 31 Desember 2024 dan 2023, seluruh efek yang dibeli dengan janji dijual kembali digolongkan sebagai lancar dan berada di *stage* 1.

Manajemen berpendapat tidak diperlukan cadangan kerugian penurunan nilai pada tanggal 31 Desember 2024 dan 2023.

As of December 31, 2024 and 2023, all securities purchased under resale agreements were classified as current and are in stage 1.

Management believes that no allowance for impairment losses is required as of December 31, 2024 and 2023.

10. PENDAPATAN BUNGA YANG MASIH AKAN DITERIMA / *10. INTEREST INCOME RECEIVABLES*

	31 Desember/*December 31*,		
	2024	**2023**	
Pinjaman yang diberikan	240.991.343	314.274.550	*Loans*
Efek-efek	79.815.159	70.597.055	*Marketable securities*
Efek-efek yang dibeli dengan janji dijual kembali	32.963	969.990	*Securities purchased under resale agreements*
Penempatan pada Bank Indonesia dan bank lain	-	325.556	*Placements with Bank Indonesia and other banks*
Jumlah	**320.839.465**	**386.167.151**	***Total***
Dikurangi: Cadangan kerugian penurunan nilai	(6.087.977)	(17.759.228)	*Less: Allowance for impairment losses*
Jumlah - bersih	**314.751.488**	**368.407.923**	***Total - net***

Mutasi cadangan kerugian penurunan nilai untuk pendapatan bunga yang masih akan diterima adalah sebagai berikut:

The changes in allowance for impairment losses of interest income receivables are as follows:

	31 Desember/*December 31*,		
	2024	**2023**	
Saldo awal	**17.759.228**	**24.551.373**	***Beginning balance***
Penambahan/(pembalikan) selama tahun berjalan (Catatan 32)	17.523.019	(3.814.474)	*Addition/(reversal) during the year (Note 32)*
Penghapusbukuan	(29.194.270)	(2.977.671)	*Write-off*
Saldo akhir	**6.087.977**	**17.759.228**	***Ending balance***

Manajemen berpendapat bahwa cadangan kerugian penurunan nilai yang telah dibentuk cukup untuk menutup kemungkinan kerugian atas pendapatan bunga yang masih akan diterima.

Management believes that the allowance for impairment losses is adequate to cover possible losses from interest income receivables.

Semua pinjaman yang diberikan kepada debitur menggunakan mata uang Rupiah dan Dolar Amerika Serikat.

All loans granted by the Bank to the debtors denominated in Rupiah and United States Dollar.

11. PINJAMAN YANG DIBERIKAN / *11. LOANS*

a. Berdasarkan pihak dan jenis kredit / *a. By counterparties and loan type*

	31 Desember/*December 31*,		
	2024	**2023**	
Pinjaman yang diberikan	20.559.860.321	18.628.743.177	*Loans*
Dikurangi: Cadangan kerugian penurunan nilai	(446.965.878)	(574.872.202)	*Less: Allowance for impairment of loan losses*
Jumlah - bersih	**20.112.894.443**	**18.053.870.975**	***Total - net***

11. PINJAMAN YANG DIBERIKAN (lanjutan) / *11. LOANS (continued)*

a. Berdasarkan pihak dan jenis kredit (lanjutan) / *a. By counterparties and loan type (continued)*

	31 Desember/*December 31*,		
	2024	**2023**	
Pihak Berelasi			***Related Parties***
Pinjaman tetap dengan angsuran	96.061.857	93.067.628	*Fixed loans with installments*
Pinjaman rekening koran	13.299.956	33.612.870	*Overdraft loans*
Pinjaman tetap	11.888.850	14.093.005	*Fixed loans*
Pinjaman serba guna	1.519.591	1.904.420	*Other loans*
Pinjaman konsumen	696.857	1.218.518	*Consumer loans*
Sub jumlah	123.467.111	143.896.441	***Sub total***
Pihak Ketiga			***Third Parties***
Pinjaman tetap	10.073.879.731	9.683.420.015	*Fixed loans*
Pinjaman tetap dengan angsuran	8.014.387.755	6.771.225.706	*Fixed loans with installments*
Pinjaman rekening koran	2.108.950.374	1.838.154.121	*Overdraft loans*
Pinjaman konsumen	166.649.807	163.408.554	*Consumer loans*
Pinjaman serba guna	72.525.543	28.638.340	*Other loans*
Sub jumlah	20.436.393.210	18.484.846.736	***Sub total***
Jumlah	**20.559.860.321**	**18.628.743.177**	***Total***
Dikurangi: Cadangan kerugian penurunan nilai	(446.965.878)	(574.872.202)	*Less: Allowance for impairment losses*
Jumlah - bersih	**20.112.894.443**	**18.053.870.975**	***Total - net***

b. Berdasarkan jangka waktu periode perjanjian pinjaman / *b. By period of the loan agreement*

	31 Desember/*December 31*,		
	2024	**2023**	
Kurang dari 1 tahun	8.174.754.905	1.102.254.095	*Less than 1 year*
1 sampai dengan 2 tahun	2.816.529.455	8.989.930.116	*1 up to 2 years*
2 sampai dengan 5 tahun	2.475.468.035	2.288.156.059	*2 up to 5 years*
Lebih dari 5 tahun	7.093.107.926	6.248.402.907	*More than 5 years*
Jumlah	20.559.860.321	18.628.743.177	*Total*
Dikurangi: Cadangan kerugian penurunan nilai	(446.965.878)	(574.872.202)	*Less: Allowance for impairment losses*
Jumlah - bersih	**20.112.894.443**	**18.053.870.975**	***Total - net***

c. Berdasarkan sisa umur jatuh tempo / *c. By remaining period to maturity*

	31 Desember/*December 31*,		
	2024	**2023**	
Kurang dari 1 tahun	11.156.818.125	10.230.458.965	*Less than 1 year*
1 sampai dengan 2 tahun	1.427.978.860	850.744.939	*1 up to 2 years*
2 sampai dengan 5 tahun	4.844.615.857	4.715.574.187	*2 up to 5 years*
Lebih dari 5 tahun	3.130.447.479	2.831.965.086	*More than 5 years*
Jumlah	20.559.860.321	18.628.743.177	*Total*
Dikurangi: Cadangan kerugian penurunan nilai	(446.965.878)	(574.872.202)	*Less: Allowance for impairment losses*
Jumlah - bersih	**20.112.894.443**	**18.053.870.975**	***Total - net***

11. PINJAMAN YANG DIBERIKAN (lanjutan) / *11. LOANS (continued)*

d. Menurut *Stage* / *d. By Stage*

Berikut adalah perubahan jumlah pinjaman yang diberikan berdasarkan *stage* selama tahun berakhir 31 Desember 2024 dan 2023:

Below is movement of loans based on stages during the year ended December 31, 2024 and 2023:

	31 Desember/ *December 31,* 2024				
	***Stage* 1**	***Stage* 2**	***Stage* 3**	**Jumlah/ *Total***	
Saldo awal tahun	**16.834.895.372**	**1.050.384.426**	**743.463.379**	**18.628.743.177**	***Balance beginning of year***
Transfer ke kerugian kredit ekspektasian 12 bulan (*Stage* 1)	34.863.775	(12.553.637)	(22.310.138)	-	*Transfer to expected credit losses (Stage 1)*
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (*Stage* 2)	(173.779.654)	173.779.654	-	-	*Transfer to lifetime expected credit losses (Stage 2)*
Transfer ke kredit yang mengalami penurunan nilai (*Stage* 3)	(83.452.847)	(285.386.494)	368.839.341	-	*Transfer to credit impaired (Stage 3)*
Total saldo awal setelah pengalihan	16.612.526.646	926.223.949	1.089.992.582	18.628.743.177	*Total opening balance after transfer*
Pengukuran kembali bersih nilai tercatat	(1.140.627.945)	(54.586.943)	(99.184.429)	(1.294.399.317)	*Net remeasurement of carrying amount*
Aset keuangan yang baru diterbitkan atau dibeli	7.809.412.723	49.523.265	-	7.858.935.988	*New financial asset originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(4.161.735.403)	(136.321.514)	(16.520.746)	(4.314.577.663)	*Derecognition of financial asset*
Aset keuangan yang dihapusbuku	-	-	(318.841.864)	(318.841.864)	*Written-off financial assets*
Total penambahan/(pengurangan) tahun berjalan	2.507.049.375	(141.385.192)	(434.547.039)	1.931.117.144	*Total additional/(reversal) during the year*
Saldo akhir tahun	**19.119.576.021**	**784.838.757**	**655.445.543**	**20.559.860.321**	***Balance end of year***

	31 Desember/ *December 31,* 2023				
	***Stage* 1**	***Stage* 2**	***Stage* 3**	**Jumlah/ *Total***	
Saldo awal tahun	**13.749.721.837**	**1.406.262.727**	**668.626.527**	**15.824.611.091**	***Balance beginning of year***
Transfer ke kerugian kredit ekspektasian 12 bulan (*Stage* 1)	524.560.294	(521.995.580)	(2.564.714)	-	*Transfer to expected credit losses (Stage 1)*
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (*Stage* 2)	(498.885.200)	498.885.200	-	-	*Transfer to lifetime expected credit losses (Stage 2)*
Transfer ke kredit yang mengalami penurunan nilai (*Stage* 3)	(117.427.616)	(261.018.850)	378.446.466	-	*Transfer to credit impaired (Stage 3)*
Total saldo awal setelah pengalihan	13.657.969.315	1.122.133.497	1.044.508.279	15.824.611.091	*Total opening balance after transfer*
Pengukuran kembali bersih nilai tercatat	(1.338.336.571)	(73.638.752)	(159.342.477)	(1.571.317.800)	*Net remeasurement of carrying amount*
Aset keuangan yang baru diterbitkan atau dibeli	8.698.335.237	201.653.500	134.001.472	9.033.990.209	*New financial asset originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(4.183.072.609)	(199.763.819)	(67.043.684)	(4.449.880.112)	*Derecognition of financial asset*
Aset keuangan yang dihapusbuku	-	-	(208.660.211)	(208.660.211)	*Written-off financial assets*
Total penambahan/(pengurangan) tahun berjalan	3.176.926.057	(71.749.071)	(301.044.900)	2.804.132.086	*Total additional/(reversal) during the year*
Saldo akhir tahun	**16.834.895.372**	**1.050.384.426**	**743.463.379**	**18.628.743.177**	***Balance end of year***

11. PINJAMAN YANG DIBERIKAN (lanjutan) / *11. LOANS (continued)*

e. Perubahan cadangan kerugian penurunan nilai / *e. The changes in allowance for impairment losses*

	31 Desember/ *December 31*, 2024				
	***Stage* 1**	***Stage* 2**	***Stage* 3**	**Jumlah/ *Total***	
Saldo awal tahun	**112.806.057**	**322.204.788**	**139.861.357**	**574.872.202**	***Balance beginning of year***
Transfer ke kerugian kredit ekspektasian 12 bulan (*Stage* 1)	12.949.232	(1.132.134)	(11.817.098)	-	*Transfer to 12 month expected credit losses (Stage 1)*
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (*Stage* 2)	(1.049.161)	1.049.161	-	-	*Transfer to lifetime expected credit losses (Stage 2)*
Transfer ke kredit yang mengalami penurunan nilai (*Stage* 3)	(2.070.794)	(116.170.501)	118.241.295	-	*Transfer to credit impaired (Stage 3)*
Total saldo awal setelah pengalihan	122.635.334	205.951.314	246.285.554	574.872.202	*Beginning balance after stage transfer*
Pengukuran kembali bersih penyisihan kerugian	(56.576.673)	(385.312)	256.680.765	199.718.780	*Net remeasurement of carrying amount*
Aset keuangan yang baru diterbitkan atau dibeli	29.899.871	22.924.119	-	52.823.990	*New financial asset originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(17.898.261)	(40.044.238)	(3.664.730)	(61.607.229)	*Derecognised financial assets*
Aset keuangan yang dihapusbuku	-	-	(318.841.865)	(318.841.865)	*Written-off financial assets*
Total penambahan/(penurunan) tahun berjalan	(44.575.063)	(17.505.431)	(65.825.830)	(127.906.324)	*Total addition/(reversal) during the year*
Saldo akhir tahun	**78.060.271**	**188.445.883**	**180.459.724**	**446.965.878**	***Balance end of year***

	31 Desember/ *December 31, 2023*				
	***Stage* 1**	***Stage* 2**	***Stage* 3**	**Jumlah/ *Total***	
Saldo awal tahun	**113.248.446**	**297.426.209**	**127.443.596**	**538.118.251**	***Balance beginning of year***
Transfer ke kerugian kredit ekspektasian 12 bulan (*Stage* 1)	101.250.110	(100.340.521)	(909.589)	-	*Transfer to 12 month expected credit losses (Stage 1)*
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (*Stage* 2)	(5.550.699)	5.550.699	-	-	*Transfer to lifetime expected credit losses (Stage 2)*
Transfer ke kredit yang mengalami penurunan nilai (*Stage* 3)	(1.669.222)	(34.430.698)	36.099.920	-	*Transfer to credit impaired (Stage 3)*
Total saldo awal setelah pengalihan	207.278.635	168.205.689	162.633.927	538.118.251	*Beginning balance after stage transfer*
Pengukuran kembali bersih penyisihan kerugian	(107.119.134)	139.909.436	185.691.182	218.481.484	*Net remeasurement of carrying amount*
Aset keuangan yang baru diterbitkan atau dibeli	41.176.937	61.568.430	9.266.982	112.012.349	*New financial asset originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(28.530.381)	(47.478.767)	(9.070.523)	(85.079.671)	*Derecognised financial assets*
Aset keuangan yang dihapusbuku	-	-	(208.660.211)	(208.660.211)	*Written-off financial assets*
Total penambahan/(penurunan) tahun berjalan	(94.472.578)	153.999.099	(22.772.570)	36.753.951	*Total addition/(reversal) during the year*
Saldo akhir tahun	**112.806.057**	**322.204.788**	**139.861.357**	**574.872.202**	***Balance end of year***

Manajemen berpendapat bahwa cadangan kerugian penurunan nilai untuk pinjaman yang diberikan adalah cukup untuk menutup kerugian yang mungkin timbul akibat tidak tertagihnya pinjaman.

The management believe that allowance for impairment losses of loans is adequate to cover impairment losses that might arise from uncollectible loans.

11. PINJAMAN YANG DIBERIKAN (lanjutan)

Jaminan atas pinjaman yang diberikan berupa tanah, bangunan, saham, giro, deposito berjangka, mesin, persediaan, dan piutang. Deposito berjangka yang dijadikan jaminan tunai untuk pinjaman yang diberikan pada tanggal 31 Desember 2024 dan 2023 masing-masing sebesar Rp1.116.894.988 dan Rp1.719.715.512 (Catatan 18) dengan *outstanding* pinjaman masing-masing sebesar Rp862.093.354 dan Rp6.228.669.396. Giro yang dijadikan jaminan tunai untuk pinjaman yang diberikan pada tanggal 31 Desember 2024 dan 2023 masing-masing sebesar Rp680.735.509 dan Rp330.646.300 (Catatan 18) dengan *outstanding* pinjaman masing-masing sebesar Rp655.693.377 dan Rp730.857.049. Tabungan yang dijadikan jaminan tunai untuk pinjaman yang diberikan pada tanggal 31 Desember 2024 sebesar Rp133.150.000 dan Rp149.150.000 (Catatan 18) dengan *outstanding* pinjaman sebesar Rp111.577.164 dan Rp409.964.166. *Negotiable Certificate Deposits* (NCD) yang dijadikan jaminan tunai untuk pinjaman yang diberikan pada tanggal 31 Desember 2024 dan 2023 masing-masing sebesar Rp131.000.000 dan Rp116.900.000 (Catatan 18) dengan *outstanding* pinjaman sebesar Rp111.804.157 dan Rp82.181.253.

11. LOANS (continued)

Collaterals for loans are in form of as land, building, shares, demand deposits, time deposits, machinery, inventories, and receivables. Time deposits that are pledged as cash collateral for loans as of December 31, 2024 and 2023 amounted to Rp1,116,894,988 and Rp1,719,715,512 (Note 18) with loan outstanding of Rp862,093,354 and Rp6,228,669,396, respectively. Demand deposits that are pledged as cash collateral for loans as of December 31, 2024 and 2023 amounted to Rp680,735,509 and Rp330,646,300 (Note 18) with loan outstanding of Rp655,693,377 and Rp730,857,049, respectively. Saving deposits that are pledged as cash collateral for loans as of December 31, 2024 amounted to Rp133,150,000 and Rp149,150,000 (Note 18) with loan outstanding of Rp111,577,164 and Rp409,964,166. Negotiable Certificate Deposits (NCD) that are pledged as cash collateral for loans as of December 31, 2024 and 2023 amounted to Rp131,000,000 and Rp116,900,000 (Note 18) with loan outstanding of Rp111,804,157 and Rp82,181,253 respectively.

12. PENYERTAAN SAHAM

12. INVESTMENTS IN SHARES

	Kepemilikan/ *Ownership*	31 Desember/*December 31*, 2024	2023	
Diukur pada FVTPL				***Measured at FVTPL***
PT Bima Multi Finance	0,00%	0*)	0*)	*PT Bima Multi Finance*
Entitas asosiasi				***Associate Entity***
PT Bank Victoria Syariah	19,81%	219.933.809	215.930.505	*PT Bank Victoria Syariah*
Jumlah		**219.933.809**	**215.930.505**	***Total***

*) nilai wajar saham PT Bima Multi Finance adalah sebesar Rp1 (dalam nilai penuh)

**) fair value of shares in PT Bima Multi Finance are Rp1 (in full amount)*

Pada tanggal 15 Desember 2023, Bank melakukan transaksi penjualan atas saham yang dimiliki pada PT Bima Multi Finance kepada PT Sumber Daya Sakti dengan harga jual sebesar Rp80.297. Nilai jual ditentukan diatas hasil penilaian yang dilakukan oleh KJPP Tri, Santi & Rekan tertanggal 8 Desember 2023. Sampai dengan tanggal laporan keuangan ini, transaksi pengalihan saham masih dalam proses pelaporan dan pencatatan di Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia oleh PT Bima Multi Finance. Pada tanggal 31 Desember 2023, Bank telah mencatat kerugian penurunan nilai wajar atas penyertaan saham PT Bima Multi Finance sebesar Rp31.877.279, sehingga nilai tercatat penyertaan saham di PT Bima Multi Finance adalah Rp1 (dalam nilai penuh) per 31 Desember 2023 dan 2024.

On December 15, 2023, the Bank sold its shares ownership in PT Bima Multi Finance to PT Sumber Daya Sakti with selling price of Rp80,297. The selling value is above the result of valuation performed by KJPP Tri, Santi & Partners dated December 8, 2023. As of the date of this financial statements, the share transfer transaction is still in the process of registering and recording in Ministry of Law and Human Rights of the Republic of Indonesia. As of December 31, 2023, the Bank has recorded a loss from decrease in fair value on shares ownership in PT Bima Multi Finance amounting to Rp31,877,279, therefore the balance of investment in shares in PT Bima Multi Finance is Rp1 (in full amount) as of December 31, 2023 and 2024.

12. PENYERTAAN SAHAM (lanjutan)

Dalam rangka memenuhi modal inti sebesar Rp1.000.000.000 (satu triliun rupiah) di PT Bank Victoria Syariah, Bank melakukan penambahan penyertaan modal kepada Bank Victoria Syariah sebesar Rp138.000.000 yang telah mendapat persetujuan dari Otoritas Jasa Keuangan (OJK) melalui surat No. S-137/PB.33/2022 tanggal 27 Desember 2022.

Berdasarkan Berita Acara Rapat Umum Luar Biasa para Pemegang Saham PT Bima Multi Finance tertanggal 12 November 2018 dan Akta Notaris No. 19 tanggal 12 Maret 2019 yang dibuat dihadapan Drs. Wijanto Suwongso, SH., Notaris di Jakarta, Bank dan beberapa kreditur lainnya telah menyetujui konversi pinjaman jangka panjang dan MTN PT Bima Multi Finance menjadi saham dengan nilai konversi Rp500 per lembar saham (nilai Rupiah penuh). Perubahan ini telah diterima dan dicatat di dalam database Sistem Administrasi Badan Hukum Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia berdasarkan Surat No. AHU-AH.01.03-0151322 tanggal 15 Maret 2019. Melalui proses konversi ini, Bank memiliki persentase kepemilikan sebesar 34,91% di PT Bima Multi Finance dan mencatatnya sebagai penyertaan saham sementara sebesar Rp168.907.325 (bruto). Setelah mencatat penyertaan saham sementara, Bank tidak lagi mengakui pinjaman yang diberikan dan MTN pada PT Bima Multi Finance.

Bank wajib untuk melakukan divestasi penyertaan saham sementara apabila penyertaan saham sementara telah melebihi jangka waktu paling lama 5 (lima) tahun atau PT Bima Multi Finance telah mencatatkan saldo laba positif pada ekuitasnya. Hal ini sesuai dengan intensi dari Bank untuk menjual penyertaan saham sementara pada PT Bima Multi Finance apabila telah memenuhi kriteria yang ditentukan.

12. INVESTMENTS IN SHARES (continued)

In order to fulfill the minimum core capital requirement amounting to Rp1,000,000,000 (one trillion Rupiah) for PT Bank Victoria Syariah, Bank has injected an additional investment in PT Bank Victoria Syariah shares amounting to Rp138,000,000 which has been approved by Financial Service Authority through letter No. S-137/PB.33/2022 dated December 27, 2022.

Based on the Minutes of Extraordinary Shareholders Meeting of PT Bima Multi Finance dated November 12, 2018 and Notarial Deed No. 19 dated March 12, 2019 of Drs. Wijanto Suwongso, S.H., a Notary in Jakarta, Bank and the other creditors have agreed on the convertion from long term loan and MTN of PT Bima Multi Finance into shares with convertion rate of Rp500 per shares (Rupiah full amount). This changes has been accepted and recorded in database of Legal Entities Administration System of the Ministry of Law and Human Rights of the Republic of Indonesia in its Letter No. AHU-AH.01.03-0151322 dated March 15, 2019. From this convertion process, Bank has 34.91% percentage of ownership in PT Bima Multi Finance and recorded as temporary investment in shares amounted to Rp168,907,325 (gross). After recording a temporary investment in shares, the Bank no longer recognise the loans and MTN in PT Bima Multi Finance.

Banks are obliged to divest temporary investment in shares if the temporary investment in shares have exceeded a maximum period of 5 (five) years or PT Bima Multi Finance has recorded positive retained earnings in their equity. This is in accordance with the Bank's intention to sell the temporary investment in PT Bima Multi Finance if it has meets the specified criteria.

12. PENYERTAAN SAHAM (lanjutan)

Bank juga tidak memiliki pengaruh signifikan pada PT Bima Multi Finance dibuktikan dengan:

i. Tidak terdapat wakil dari Bank yang menjabat sebagai Dewan Direksi dan Dewan Komisaris atau organ setara di PT Bima Multi Finance;

ii. Bank tidak berpartisipasi dalam proses pembuatan kebijakan, termasuk dalam partisipasi dalam pengambilan keputusan tentang dividen atau distribusi lain pada PT Bima Multi Finance;
iii. Tidak adanya transaksi material antara Bank dengan PT Bima Multi Finance;
iv. Tidak terdapat pertukaran personil manajerial antara Bank dengan PT Bima Multi Finance; dan
v. Bank tidak terlibat dalam penyediaan teknis informasi pokok untuk PT Bima Multi Finance.

Lihat Catatan 45 untuk pengukuran nilai wajar penyertaan saham pada tanggal 31 Desember 2024 dan 2023.

12. INVESTMENTS IN SHARES (continued)

Bank also does not have a significant influence on PT Bima Multi Finance as evidenced by:

i. There is no representative from the Bank who serves as the Board of Directors and the Board of the Commissioners or equivalent organs in PT Bima Multi Finance;
ii. The Bank does not participate in the policy-making process, including participation in decision-making about dividends or other distributions in PT Bima Multi Finance;

iii. There is no material transaction between the Bank and PT Bima Multi Finance;
iv. There is no managerial personnel exchange between the Bank and PT Bima Multi Finance; and
v. The Bank is not involved in providing principal technical information for PT Bima Multi Finance.

Refer to Note 45 for fair value measurement of investment in shares as of December 31, 2024 and 2023.

13. BIAYA DIBAYAR DIMUKA / *13. PREPAID EXPENSES*

	31 Desember/*December 31*,		
	2024	**2023**	
Promosi	23.670.778	17.034.405	*Promotion*
Pengembangan teknologi	3.578.500	3.152.376	*Technology development*
Sewa dibayar dimuka	174.368	877.362	*Prepaid rent*
Lain-lain	3.719.980	4.400.881	*Others*
Jumlah	**31.143.626**	**25.465.024**	***Total***

Lain-lain sebagian besar terdiri dari premi asuransi dibayar dimuka, biaya dibayar dimuka personalia dan biaya jasa hukum.

Others mainly consists of prepaid insurances, prepaid salaries expenses and legal fees.

14. ASET TETAP DAN ASET HAK-GUNA / *14. FIXED ASSETS AND RIGHT-OF-USE ASSETS*

Aset tetap terdiri dari:

Fixed assets consist of the following:

	31 Desember/*December 31*,		
	2024	**2023**	
Kepemilikan langsung	354.630.313	376.477.361	*Direct ownership*
Aset hak-guna	36.803.224	46.749.843	*Right-of-use assets*
Jumlah	**391.433.537**	**423.227.204**	***Total***

14. ASET TETAP DAN ASET HAK-GUNA (lanjutan) / *14. FIXED ASSETS AND RIGHT-OF-USE ASSETS (continued)*

Aset tetap kepemilikan langsung / *Direct ownership fixed assets*

	31 Desember/*December 31*, 2024						
	Saldo awal/ *Beginning balance*	**Penambahan/ *Additions***	**Pengurangan/ *Deductions***	**Kapitalisasi/ *Capitalisation***	**Revaluasi/ *Revaluation***	**Saldo akhir/ *Ending balance***	
Biaya Perolehan							***Acquisition Cost***
Kepemilikan langsung:							*Direct ownership:*
Tanah	316.137.746	-	(30.010.821)	-	7.979.960	294.106.885	*Land*
Bangunan	51.001.653	2.673.440	(1.115.203)	-	(12.805.119)	39.754.771	*Buildings*
Kendaraan bermotor	8.125.155	2.884.800	(3.451.375)	-	-	7.558.580	*Vehicles*
Mesin-mesin dan peralatan	42.409.202	13.870.498	(743.307)	-	-	55.536.393	*Machinery and equipment*
Perlengkapan dan perabotan kantor	6.647.750	373.358	(33.100)	-	-	6.988.008	*Office furniture and equipment*
Aset tetap dalam proses pembangunan	19.290.946	-	-	-	(8.230.946)	11.060.000	*Assets under constructions*
Jumlah biaya perolehan	443.612.452	19.802.096	(35.353.806)	-	(13.056.105)	415.004.637	*Total acquisition cost*
Akumulasi Penyusutan							***Accumulated Depreciation***
Kepemilikan langsung:							*Direct ownership:*
Bangunan	27.680.724	3.945.713	(743.470)	-	(13.705.151)	17.177.816	*Buildings*
Kendaraan bermotor	5.928.291	896.717	(3.451.375)	-	-	3.373.633	*Vehicles*
Mesin-mesin dan peralatan	27.415.712	6.815.676	(743.307)	-	-	33.488.081	*Machinery and equipment*
Perlengkapan dan perabotan kantor	6.110.364	257.530	(33.100)	-	-	6.334.794	*Office furniture and equipment*
Jumlah akumulasi penyusutan	67.135.091	11.915.636	(4.971.252)	-	(13.705.151)	60.374.324	*Total accumulated depreciation*
Nilai buku bersih	**376.477.361**					**354.630.313**	***Net book value***

	31 Desember/*December 31*, 2023						
	Saldo awal/ *Beginning balance*	**Penambahan/ *Additions***	**Pengurangan/ *Deductions***	**Kapitalisasi/ *Capitalisation***	**Reklasifikasi/ *Reclassification***	**Saldo akhir/ *Ending balance***	
Biaya Perolehan							***Acquisition Cost***
Kepemilikan langsung:							*Direct ownership:*
Tanah	371.644.982	-	(44.913.045)	350.580	(10.944.771)	316.137.746	*Land*
Bangunan	59.090.423	1.613.152	(6.366.089)	149.000	(3.484.833)	51.001.653	*Buildings*
Kendaraan bermotor	6.030.655	2.099.300	(4.800)	-	-	8.125.155	*Vehicles*
Mesin-mesin dan peralatan	30.603.912	12.079.980	(274.690)	-	-	42.409.202	*Machinery and equipment*
Perlengkapan dan perabotan kantor	6.317.231	398.594	(68.075)	-	-	6.647.750	*Office furniture and equipment*
Aset tetap dalam proses pembangunan	21.086.752	4.774	(1.450.000)	-	(350.580)	19.290.946	*Assets under constructions*
Jumlah biaya perolehan	494.773.955	16.195.800	(53.076.699)	499.580	(14.780.184)	443.612.452	*Total acquisition cost*
Akumulasi Penyusutan							***Accumulated Depreciation***
Kepemilikan langsung:							*Direct ownership:*
Bangunan	24.792.291	6.296.274	(2.246.808)	-	(1.161.033)	27.680.724	*Buildings*
Kendaraan bermotor	5.642.107	290.984	(4.800)	-	-	5.928.291	*Vehicles*
Mesin-mesin dan peralatan	23.339.109	4.351.117	(274.514)	-	-	27.415.712	*Machinery and equipment*
Perlengkapan dan perabotan kantor	5.962.013	216.426	(68.075)	-	-	6.110.364	*Office furniture and equipment*
Jumlah akumulasi penyusutan	59.735.520	11.154.801	(2.594.197)	-	(1.161.033)	67.135.091	*Total accumulated depreciation*
Nilai buku bersih	**435.038.435**					**376.477.361**	***Net book value***

Rincian laba/(rugi) penjualan aset tetap adalah sebagai berikut: / *The details of gain/(loss) on sale of fixed assets are as follows:*

	31 Desember/*December 31*,		
	2024	**2023**	
Hasil penjualan aset tetap	28.782.400	45.395.525	*Proceeds from sale of fixed assets*
Nilai buku	(30.382.553)	(49.032.326)	*Book value*
Laba/(rugi) penjualan aset tetap (Catatan 36)	**(1.600.153)**	**(3.636.801)**	***Gain/(loss) on sale of fixed assets (Note 36)***

14. ASET TETAP DAN ASET HAK-GUNA

Aset tetap kepemilikan langsung (lanjutan)

Laba/(rugi) penjualan aset tetap disajikan sebagai bagian dari akun "Beban (pendapatan) non-operasional - bersih" pada laporan laba rugi dan penghasilan komprehensif (Catatan 36).

Aset tetap dalam proses pembangunan pada tanggal 31 Desember 2024 dan 2023 masing-masing sebesar Rp11.060.000 dan Rp19.290.946 merupakan tanah dan bangunan yang dibeli dan masih dalam tahap perizinan dan perpanjangan Surat Hak Guna Bangunan (SHGB). Estimasi persentase tingkat penyelesaian aset tetap dalam proses pembangunan pada tanggal 31 Desember 2024 dan 2023 adalah 90%. Konstruksi tersebut diperkirakan akan selesai pada tahun 2026.

Bank memiliki beberapa bidang tanah yang terletak di Jakarta, Bandung, Surabaya, dan Denpasar dengan hak kepemilikan berupa Hak Guna Bangunan yang berjangka waktu antara 20 (dua puluh) sampai dengan 30 (tiga puluh) tahun yang akan jatuh tempo dalam berbagai tahun sampai tahun 2046. Manajemen berpendapat bahwa tidak terdapat masalah dengan perpanjangan hak atas tanah karena seluruh tanah diperoleh secara sah dan didukung dengan bukti kepemilikan yang memadai.

Aset tetap, kecuali tanah, diasuransikan terhadap risiko kebakaran dan pencurian kepada PT Victoria Insurance (pihak berelasi) dengan nilai pertanggungan seluruhnya pada tanggal 31 Desember 2024 dan 2023 masing-masing sebesar Rp153.530.250 dan Rp160.234.700. Manajemen Bank berpendapat bahwa nilai pertanggungan tersebut telah memadai untuk menutup kemungkinan kerugian atas aset tetap yang dipertanggungkan.

Seluruh aset tetap yang ada pada tanggal pelaporan 31 Desember 2024 dan 2023 digunakan untuk menunjang aktivitas operasi Bank. Pada tanggal 31 Desember 2024 dan 2023, jumlah nilai perolehan aset tetap yang telah disusutkan penuh namun masih digunakan masing-masing adalah sebesar Rp60.058.395 dan Rp50.576.817.

Manajemen Bank telah melakukan pengkajian kembali atas estimasi umur ekonomis, metode penyusutan dan nilai residu aset tetap pada tanggal 31 Desember 2024 dan 2023.

14. FIXED ASSETS AND RIGHT-OF-USE ASSETS

Direct ownership fixed assets (continued)

Gain/(loss) on sale of fixed assets is presented as part of "Non-operating expense (income) - net" in the statement profit or loss and other comprehensive income (Note 36).

Assets under construction as of December 31, 2024 and 2023 amounting to Rp11,060,000 and Rp19,290,946, respectively, related to land and buildings that were bought but still under licensing phase and extension of Rights to Build (SHGB). The estimated percentage of completion of Construction in progress as of December 31, 2024 and 2023 is 90%. Those constructions are estimated to be completed in 2026.

The Bank own several fields of land in Jakarta, Bandung, Surabaya, and Denpasar with Building Usage Rights ("HGB") for 20 (twenty) up to 30 (thirty) years which will expire in various years up to 2046. The management believes that there will be no difficulty in the extension of the land rights since all of the land were acquired legally and supported by sufficient evidence of ownership.

Fixed assets, except land, are insured against losses by fire and theft risks to PT Victoria Insurance (related party) with total insurance coverage as of December 31, 2024 and 2023 amounting Rp153,530,250 and Rp160,234,700, respectively. The Bank's management believe that the insurance coverage is adequate to cover possible losses on fixed assets insured.

All of the fixed assets as of the reporting date December 31, 2024 and 2023 are used to support the Bank's operation activities. As of December 31, 2024 and 2023, the total acquisition cost of fixed assets that have been fully depreciated but still in use amounted Rp60,058,395 and Rp50,576,817, respectively.

The Bank's Management has re-assessed the estimation of useful lives,depreciation method and residual value of fixed assets on December 31, 2024 and 2023.

14. ASET TETAP DAN ASET HAK-GUNA (lanjutan)

14. FIXED ASSETS AND RIGHT-OF-USE ASSETS (continued)

Aset tetap kepemilikan langsung (lanjutan)

Direct ownership fixed assets (continued)

Tidak terdapat aset tetap yang dihentikan dari penggunaan aktif atau diklasifikasikan sebagai tersedia untuk dijual.

There are no fixed assets discontinued from active use or classified as assets held for sale.

Berikut adalah perkiraan jumlah nilai tercatat aset tetap jika dicatat dengan metode biaya pada tanggal 31 Desember 2024 dan 2023:

Below is the estimated net book value of fixed asset if recorded using cost method as of December 31, 2024 and 2023:

	31 Desember/*December 31*,		
	2024	**2023**	
Tanah	286.126.927	275.568.597	*Land*
Bangunan	21.676.922	7.761.128	*Building*
Kendaraan Bermotor	4.184.947	2.196.864	*Vehicle*
Mesin dan Peralatan	22.048.312	14.993.490	*Machinery and equipment*
Perlengkapan dan perabotan kantor	653.214	537.386	*Office furniture and equipment*
Aset tetap dalam proses pembangunan	19.290.946	19.636.752	*Assets under constructions*
	353.981.268	**320.694.217**	

Aset hak-guna

Right-of-use assets

Aset hak-guna pada 31 Desember 2024 dan 2023 adalah sebagai berikut:

Rights-of-use assets as of December 31, 2024 and 2023 are as follows:

	31 Desember/ *December 31*, 2024					
	Saldo awal/ *Beginning balance*	**Penambahan/ *Additions***	**Pengurangan/ *Disposals***	**Reklasifikasi/ *Reclassification***	**Saldo akhir/ *Ending balance***	
Aset hak-guna						***Right-of-use assets***
Bangunan	61.474.143	2.619.166	(7.909.174)	-	56.184.135	*Buildings*
Akumulasi Penyusutan						***Accumulated Depreciation***
Bangunan	14.724.300	12.565.785	(7.909.174)	-	19.380.911	*Buildings*
Nilai buku bersih	**46.749.843**				**36.803.224**	***Net book value***

	31 Desember/ *December 31*, 2023					
	Saldo awal/ *Beginning balance*	**Penambahan/ *Additions***	**Pengurangan/ *Disposals*)***	**Reklasifikasi/ *Reclassification***	**Saldo akhir/ *Ending balance***	
Aset hak-guna						***Right-of-use assets***
Bangunan	49.959.422	21.754.777	(10.240.056)	-	61.474.143	*Buildings*
Akumulasi Penyusutan						***Accumulated Depreciation***
Bangunan	14.144.830	10.819.526	(10.240.056)	-	14.724.300	*Buildings*
Nilai buku bersih	**35.814.592**				**46.749.843**	***Net book value***

14. ASET TETAP DAN ASET HAK-GUNA (lanjutan) / *14. FIXED ASSETS AND RIGHT-OF-USE ASSETS (continued)*

Aset hak-guna (lanjutan) / *Right-of-use assets (continued)*

Pada tanggal 31 Desember 2024 dan 2023, penyusutan yang tercatat pada Bank adalah sebagai berikut (Catatan 33):

As of December 31, 2024 and 2023, depreciation expense recorded by the Bank as follows (Note 33):

	31 Desember/*December 31*,		
	2024	**2023**	
Penyusutan aset tetap	11.915.636	11.154.801	*Depreciation of fixed asset*
Penyusutan sewa guna usaha	12.565.785	10.819.526	*Depreciation of right-of-use assets*
Jumlah	**24.481.421**	**21.974.327**	***Total***

Laporan posisi keuangan menunjukkan jumlah terkait sewa adalah sebagai berikut:

The balance sheet shows the following amounts relating to leases:

	31 Desember/*December 31*,		
	2024	**2023**	
Aset hak-guna:			*Right-of-use assets:*
- Bangunan	36.803.224	46.749.843	*Buildings -*
	36.803.224	**46.749.843**	
Liabilitas sewa (Catatan 23)	39.811.304	47.309.526	*Lease liabilities (Note 23)*
	39.811.304	**47.309.526**	

Laporan laba rugi menunjukkan jumlah terkait sewa adalah sebagai berikut:

The statement of profit or loss shows the following amounts relating to leases:

	31 Desember/*December 31*,		
	2024	**2023**	
Beban penyusutan	12.565.785	10.819.526	*Depreciation expense*
Beban bunga atas liabilitas sewa (Catatan 33)	4.117.817	2.854.679	*Interest expense of lease liabilities (Note 33)*
Jumlah	**16.683.602**	**13.674.205**	***Total***

Revaluasi aset tetap / *Fixed asset revaluation*

Penilaian kembali atas nilai wajar aset tetap yang dimiliki Bank pada 31 Desember 2024 telah dilakukan oleh Kantor Jasa Penilai Publik ("KJPP") Jimmy Prasetyo dan Rekan dengan laporan penilaian tertanggal 9 Januari 2025 atas aset tetap berupa tanah dan bangunan, serta laporan penilaian tertanggal 16 Januari 2025 atas aset tetap dalam proses pembangunan berupa tanah dan bangunan di Bali. Laporan penilaian ditandatangani oleh Audrey Angelina, M.Bus., MAPPI (Cert.), penilai independen yang telah terdaftar pada OJK.

Revaluation on fair value of the Bank's fixed assets as of December 31, 2024 was performed by Kantor Jasa Penilai Publik ("KJPP") Jimmy Prasetyo dan Rekan with valuation report dated January 9, 2025 for fixed assets in forms of land and building, also valuation report dated January 16, 2025 for assets under constructions of land and building in Bali. The valuation report was signed by Audrey Angelina, M.Bus., MAPPI (Cert.), independent appraiser registered in OJK.

14. ASET TETAP DAN ASET HAK-GUNA (lanjutan)

Revaluasi aset tetap (lanjutan)

Metode penilaian yang digunakan adalah Metode Pendekatan Data Pasar dan Metode Biaya. Data pembanding untuk menentukan nilai wajar aset diperoleh dari data transaksi jual beli dari aset sebanding dengan menyesuaikan perbedaan-perbedaan antara aset yang dinilai dengan data pembanding. Perbandingan ini juga menyangkut berbagai faktor seperti lokasi, luas, bentuk, karakteristik dan kegunannya berdasarkan unsur waktu dan peruntukannya.

Selisih bersih penilaian kembali tanah dan bangunan tahun 2024 sebesar Rp649.046, disajikan sebagai "surplus revaluasi aset tetap" pada penghasilan komprehensif lain sebesar Rp10.825.959 dan sebagai "penurunan nilai aset tetap" pada laba rugi sebesar Rp10.176.913 (Catatan 36).

Pada tanggal 31 Desember 2024, manajemen juga telah melakukan reklasifikasi atas surplus revaluasi ke saldo laba - belum ditentukan penggunaannya, untuk tanah dan bangunan yang telah dijual sebesar Rp74.191.006.

Pada tanggal 31 Desember 2024 dan 2023 saldo surplus revaluasi aset tetap masing-masing adalah sebesar Rp316.445.478 dan Rp382.456.152.

14. FIXED ASSETS AND RIGHT-OF-USE ASSETS (continued)

Fixed asset revaluation (continued)

Valuation method used is Market Data Approach and Cost Approach Method. Comparative data to determine fair value asset is obtained from data of sale and purchase transactions from comparable assets by adjusting differences between assets valued and comparable data. This comparison is also concerns factors such as location, size, shape, characteristics and function based on its time and intended used.

The net difference in land and building revaluation in 2024 amounted to Rp649,046, recorded as "gain on revaluation of fixed asset" in other comprehensive income amounted to Rp10,825,959 and as "impairment of fixed asset" in profit or loss amounted to Rp10,176,913 (Note 36).

As of December 31, 2024, the Bank's Management has also reclassified the revaluation surplus to retained earnings - unappropriated for disposed land and buildings amounted to Rp74,191,006.

As of December 31, 2024 and 2023, gain on revaluation of fixed assets amounted to Rp316,445,478 and Rp382,456,152, respectively.

15. AGUNAN YANG DIAMBIL ALIH

Agunan yang diambil alih untuk penyelesaian pinjaman yang diberikan dicatat dalam akun Agunan yang Diambil Alih ("AYDA"). Rincian dalam akun ini adalah:

15. FORECLOSED ASSETS

Foreclosed assets in settlement of loans are included in Foreclosed assets ("AYDA") account. The details in the account are as follows:

	31 Desember/*December 31*,		
	2024	**2023**	
Tanah dan bangunan	544.115.286	802.486.682	*Land and building*
Dikurangi:			*Less:*
Cadangan kerugian penurunan nilai	(165.131.092)	(251.870.489)	*Allowance for impairment losses*
	378.984.194	**550.616.193**	

Berdasarkan Peraturan Otoritas Jasa Keuangan (POJK) No. 40/POJK.03/2019 tanggal 19 Desember 2019 tentang "Penilaian Kualitas Aktiva Bank Umum", khususnya agunan yang diambil alih, Bank diwajibkan untuk melakukan upaya penyelesaian terhadap agunan yang diambil alih yang dimiliki.

Based on Financial Service Authority Regulation No. 40/POJK.03/2019 dated December 19, 2019 regarding "Asset Quality Ratings for Commercial Banks" and particularly on the foreclosed assets, the Bank is required to have an action plan for settlement of its foreclosed assets.

15. AGUNAN YANG DIAMBIL ALIH (lanjutan) / *15. FORECLOSED ASSETS (continued)*

Mutasi nilai agunan yang diambil alih adalah sebagai berikut:

The changes in foreclosed assets are as follows:

	31 Desember/*December 31*,		
	2024	**2023**	
Saldo awal	**802.486.682**	**1.237.844.890**	***Beginning balance***
Penambahan selama tahun berjalan	72.000.000	-	*Addition during the year*
Pengurangan selama tahun berjalan	(330.371.396)	(435.358.208)	*Deduction during the year*
Saldo akhir	**544.115.286**	**802.486.682**	***Ending balance***

Mutasi cadangan kerugian penurunan nilai untuk agunan yang diambil alih adalah sebagai berikut:

The changes in allowance for impairment losses of forecosed assets are as follows:

	31 Desember/*December 31*,		
	2024	**2023**	
Saldo awal	**251.870.489**	**306.834.651**	***Beginning balance***
Penambahan selama tahun berjalan	44.528.554	48.469.233	*Addition during the year*
Pengurangan selama tahun berjalan	(131.267.951)	(103.433.395)	*Deduction during the year*
Saldo akhir	**165.131.092**	**251.870.489**	***Ending balance***

Manajemen berpendapat bahwa cadangan kerugian penurunan nilai yang telah dibentuk cukup untuk menutup kemungkinan kerugian atas agunan yang diambil alih.

Management believes that the allowance for impairment losses is adequate to cover possible losses from foreclosed assets.

16. ASET TAK BERWUJUD / *16. INTANGIBLE ASSETS*

	31 Desember/ *December 31*, 2024						
	Saldo awal/ *Beginning balance*	**Penambahan/ *Additions***	**Pengurangan/ *Deductions***	**Kapitalisasi/ *Capitalisation***	**Reklasifikasi/ *Reclassification***	**Saldo akhir/ *Ending balance***	
Biaya Perolehan	23.819.348	5.893.171	-	-	-	29.712.519	*Acquisition Cost*
Dikurangi: Akumulasi amortisasi	15.626.535	2.986.566	-	-	-	18.613.101	*Less: Accumulated amortisation*
Nilai buku	**8.192.813**					**11.099.418**	***Net book value***

	31 Desember/ *December 31*, 2023						
	Saldo awal/ *Beginning balance*	**Penambahan/ *Additions***	**Pengurangan/ *Deductions***	**Kapitalisasi/ *Capitalisation***	**Reklasifikasi/ *Reclassification***	**Saldo akhir/ *Ending balance***	
Biaya Perolehan	16.530.098	7.289.250	-	-	-	23.819.348	*Acquisition Cost*
Dikurangi: Akumulasi amortisasi	13.998.914	1.627.621	-	-	-	15.626.535	*Less: Accumulated amortisation*
Nilai buku	**2.531.184**					**8.192.813**	***Net book value***

Aset tak berwujud yang dimiliki oleh Bank berupa lisensi aplikasi yang dibeli oleh Bank.

Intangible assets held by the Bank is application license purchased by the Bank.

Amortisasi yang dicatat oleh Bank masing-masing sebesar Rp2.986.566 dan Rp1.627.621 untuk tahun yang berakhir pada tanggal 31 Desember 2024 dan 2023 (Catatan 33).

Amortisation recorded by the Bank amounted to Rp2,986,566 and Rp1,627,621 the years ended December 31, 2024 and 2023, respectively (Note 33).

Berdasarkan penelaahan manajemen, tidak terdapat kejadian atau perubahan keadaan yang mengindikasikan adanya penurunan nilai aset tak berwujud pada tanggal 31 Desember 2024 dan 2023.

Based on the management assessment, there are no events or changes in circumstances indicating an impairment of intangible assets as of December 31, 2024 and 2023.

17. ASET LAIN-LAIN / *17. OTHER ASSETS*

	31 Desember/*December 31*,		
	2024	**2023**	
Uang muka pada pihak ketiga	61.950.360	43.213.258	*Advance payment to third parties*
Properti terbengkalai	31.148.944	33.794.570	*Abandoned property*
Uang jaminan	6.661.843	7.949.842	*Security deposits*
Tagihan pihak ketiga	5.089.644	4.853.701	*Receivables from third parties*
Lain-lain	77.599.366	14.008.442	*Others*
	182.450.157	**103.819.813**	
Dikurangi:			*Less:*
Cadangan kerugian penurunan nilai	(11.336.194)	(12.356.770)	*Allowance for impairment losses*
Jumlah	**171.113.963**	**91.463.043**	***Total***

Penilaian kembali atas nilai wajar tanah dan bangunan yang dimiliki Bank pada 31 Desember 2024 telah dilakukan oleh Kantor Jasa Penilai Publik ("KJPP") Jimmy Prasetyo dan Rekan dengan laporan penilaian tertanggal 9 Januari 2025 atas tanah dan bangunan termasuk properti terbengkalai. Laporan penilaian ditandatangani oleh Audrey Angelina, M.Bus., MAPPI (Cert.), penilai independen yang telah terdaftar pada OJK.

Revaluation on fair value of the Bank's land and building as of December 31, 2024 was performed by Kantor Jasa Penilai Publik ("KJPP") Jimmy Prasetyo dan Rekan with valuation report dated January 9, 2025 for land and building included abandoned property. The valuation report was signed by Audrey Angelina, M.Bus., MAPPI (Cert.), independent appraiser registered in OJK.

Selisih penilaian kembali properti terbengkalai tahun 2024 sebesar Rp2.645.626 telah dikreditkan pada pendapatan komprehensif lainnya dan disajikan sebagai "Surplus revaluasi aset tetap" di ekuitas

The difference in abandoned property revaluation in 2024 amounted to Rp2,645,626 was credited to other comprehensive income and presented as "Gain on revaluation of fixed assets" in equity.

Uang jaminan merupakan uang yang disetor sebagai jaminan untuk sewa gedung kantor.

Security deposits represent deposit pledged as guarantee for building rental.

Lain-lain terutama terdiri dari tagihan transaksi valuta asing, tagihan biaya administrasi dan persediaan barang promosi.

Others mainly consists of foreign exchange transaction, administrative expense transaction and promotion inventories.

Seluruh aset lain-lain pada tanggal 31 Desember 2024 dan 2023 adalah transaksi dengan pihak ketiga.

All other assets as of December 31, 2024 and 2023 are transactions with third parties.

Mutasi cadangan kerugian penurunan nilai untuk aset lain-lain adalah sebagai berikut:

The changes in allowance for impairment losses of other assets are as follows:

	31 Desember/*December 31*,		
	2024	**2023**	
Saldo awal	**12.356.770**	**14.323.476**	***Beginning balance***
Pembalikan selama tahun berjalan	(1.020.576)	(1.966.706)	*Reversal during the year*
Saldo akhir	**11.336.194**	**12.356.770**	***Ending balance***

Manajemen berpendapat bahwa cadangan kerugian penurunan nilai yang telah dibentuk cukup untuk menutup kemungkinan kerugian atas aset lain-lain.

Management believes that the allowance for impairment losses is adequate to cover possible losses from other assets.

18. SIMPANAN NASABAH / *18. DEPOSITS FROM CUSTOMERS*

Semua simpanan nasabah dalam mata uang Rupiah dan mata uang asing, terdiri dari:

All deposits from customers in Rupiah and foreign currency, consist of:

	31 Desember/*December 31*,		
	2024	**2023**	
Rupiah			***Rupiah***
Negotiable Certificate Deposit	450.000.000	440.000.000	*Negotiable Certificate Deposits*
Dikurangi:			*Less*:
Diskonto	(19.840.753)	(42.800.790)	*Discount*
Beban emisi yang belum diamortisasi	(1.357.493)	(2.890.637)	*Unamortised issuance cost*
Deposito berjangka	15.908.972.247	16.044.264.144	*Time deposits*
Tabungan	3.286.885.846	2.881.781.337	*Savings deposits*
Giro	2.845.040.277	2.417.884.361	*Demand deposits*
Sub jumlah	**22.469.700.124**	**21.738.238.415**	***Sub total***
Mata uang asing			***Foreign currency***
Deposito berjangka	792.560.467	624.320.546	*Time deposits*
Giro	69.850.909	66.621.531	*Demand deposits*
Sub jumlah	**862.411.376**	**690.942.077**	***Sub total***
Jumlah	**23.332.111.500**	**22.429.180.492**	***Total***

Simpanan nasabah dalam mata uang asing adalah Dolar Amerika Serikat, Dolar Singapura, Euro Eropa, dan Yen Jepang.

All deposits from customers in foreign currency are denominated in United States Dollar, Singapore Dollar, European Euro, and Japanese Yen.

a. Giro / *a. Demand Deposits*

(i) Berdasarkan pihak lawan / *(i) By counterparties*

	31 Desember/*December 31*,		
	2024	**2023**	
Pihak berelasi (Catatan 39)	209.682.617	652.841.415	*Related parties (Note 39)*
Pihak ketiga	2.705.208.569	1.831.664.477	*Third parties*
Jumlah	**2.914.891.186**	**2.484.505.892**	***Total***

(ii) Berdasarkan mata uang / *(ii) By currency*

	31 Desember/*December 31*,		
	2024	**2023**	
Rupiah	2.845.040.277	2.417.884.361	*Rupiah*
Dolar Amerika Serikat	63.854.041	60.590.713	*United States Dollar*
Yen Jepang	3.652.877	2.576.994	*Japanese Yen*
Euro Eropa	1.623.030	1.551.542	*European Euro*
Dolar Singapura	720.961	1.902.282	*Singapore Dollar*
Jumlah	**2.914.891.186**	**2.484.505.892**	***Total***

Giro yang dijadikan sebagai jaminan tunai atas pinjaman yang diberikan pada tanggal 31 Desember 2024 dan 2023 masing-masing sebesar Rp680.735.509 dan Rp330.646.300 (Catatan 11).

Demand deposits amounting to Rp680,735,509 and Rp330,646,300 pledged as collateral or blocked as of December 31, 2024 and 2023, respectively (Note 11).

18. SIMPANAN NASABAH (lanjutan) / *18. DEPOSITS FROM CUSTOMERS (continued)*

b. Tabungan / *b. Savings deposits*

Berdasarkan pihak lawan / ***By counterparties***

	31 Desember/*December 31*,		
	2024	**2023**	
Rupiah			***Rupiah***
Pihak berelasi (Catatan 39)	33.955.891	27.996.913	*Related parties (Note 39)*
Pihak ketiga	3.252.929.955	2.853.784.424	*Third parties*
Jumlah	**3.286.885.846**	**2.881.781.337**	***Total***

Tabungan yang dijadikan sebagai jaminan tunai atas pinjaman yang diberikan pada tanggal 31 Desember 2024 dan 2023 masing-masing sebesar Rp133.150.000 dan Rp149.150.000 (Catatan 11).

Saving deposits amounting to Rp133,150,000 and Rp149,150,000 pledged as collateral or blocked as of December 31, 2024 and 2023, respectively (Note 11).

c. Deposito berjangka / *c. Time deposits*

(i) Berdasarkan pihak lawan / ***(i) By counterparties***

	31 Desember/*December 31*,		
	2024	**2023**	
Pihak berelasi (Catatan 39)	323.392.414	618.884.872	*Related parties (Note 39)*
Pihak ketiga	16.378.140.300	16.049.699.818	*Third parties*
Jumlah	**16.701.532.714**	**16.668.584.690**	***Total***

(ii) Berdasarkan mata uang / ***(ii) By currency***

	31 Desember/*December 31*,		
	2024	**2023**	
Rupiah	15.908.972.247	16.044.264.144	*Rupiah*
Dolar Amerika Serikat	792.560.467	624.320.546	*United States Dollar*
Jumlah	**16.701.532.714**	**16.668.584.690**	***Total***

(iii) Berdasarkan periode / ***(iii) By period***

	31 Desember/*December 31*,		
	2024	**2023**	
1 bulan	6.738.282.288	7.144.058.086	*1 month*
3 bulan	5.460.370.322	4.512.705.040	*3 months*
6 bulan	3.093.120.546	3.608.059.929	*6 months*
12 bulan	1.409.759.558	1.403.761.635	*12 months*
Jumlah	**16.701.532.714**	**16.668.584.690**	***Total***

18. SIMPANAN NASABAH (lanjutan) / *18. DEPOSITS FROM CUSTOMERS (continued)*

c. Deposito berjangka (lanjutan) / *c. Time deposits (continued)*

(iv) Berdasarkan sisa umur sampai dengan jatuh tempo / *(iv) By remaining period until maturity*

	31 Desember/*December 31*,		
	2024	**2023**	
Kurang dari 1 bulan	8.877.238.912	8.757.247.243	*Less than 1 month*
1 sampai dengan 3 bulan	4.957.707.565	4.371.648.337	*1 up to 3 months*
3 sampai dengan 6 bulan	2.105.498.658	2.680.083.163	*3 up to 6 months*
6 sampai dengan 12 bulan	761.087.579	859.605.947	*6 up to 12 months*
Jumlah	**16.701.532.714**	**16.668.584.690**	***Total***

Deposito berjangka yang dijadikan sebagai jaminan tunai atas pinjaman yang diberikan pada tanggal 31 Desember 2024 dan 2023 masing-masing adalah sebesar Rp1.116.894.988 dan Rp1.719.715.512 (Catatan 11).

Time deposits which are pledged as collateral on loans as of December 31, 2024 and 2023 amounted to Rp1,116,894,988 and Rp1,719,715,512 respectively (Note 11).

Informasi mengenai tingkat suku bunga diungkapkan pada Catatan 44.

Informations respect to interest rate are disclosed in Note 44.

d. *Negotiable Certificate Deposits* / *d. Negotiable Certificate Deposits*

	31 Desember/*December 31*,		
	2024	**2023**	
Pihak berelasi (Catatan 39)			***Related parties (Note 39)***
Negotiable Certificate Deposit	109.900.000	110.400.000	*Negotiable Certificate Deposits*
Dikurangi:			*Less*:
Diskonto	(4.657.140)	(11.427.886)	*Discount*
Beban emisi yang belum diamortisasi	(323.343)	(725.287)	*Unamortised issuance cost*
Sub jumlah	104.919.517	98.246.827	*Sub total*
Pihak ketiga			***Third parties***
Negotiable Certificate Deposit	340.100.000	329.600.000	*Negotiable Certificate Deposits*
Dikurangi:			*Less*:
Diskonto	(15.183.613)	(31.372.904)	*Discount*
Beban emisi yang belum diamortisasi	(1.034.150)	(2.165.350)	*Unamortised issuance cost*
Sub jumlah	323.882.237	296.061.746	*Sub total*
Jumlah	**428.801.754**	**394.308.573**	***Total***

Bank melakukan penerbitan *Negotiable Certificate of Deposit* (NCD) pada tanggal 5 September 2023 sebesar Rp440.000.000 yang terbagi dua seri, yaitu seri A dengan nilai sebesar Rp50.000.000 dengan suku bunga 6,5% dan jatuh tempo pada tanggal 5 September 2024 dan seri B dengan nilai sebesar Rp390.000.000 dengan suku bunga 7% dan jatuh tempo pada tanggal 5 September 2025.

The Bank issues a Negotiable Certificate of Deposit (NCD) on September 5, 2023, amounting to Rp440,000,000 which is divided into two series, namely series A with a value of Rp50,000,000 with an interest rate of 6.5% and due on September 5, 2024 and series B with a value of Rp390,000,000 with an interest rate of 7% and due on September 5, 2025.

18. SIMPANAN NASABAH (lanjutan)

d. *Negotiable Certificate Deposits* (lanjutan)

Bank melakukan penerbitan *Negotiable Certificate of Deposit* (NCD) pada tanggal 3 April 2024 sebesar Rp110.000.000 yang terbagi dua seri, yaitu seri A dengan nilai sebesar Rp70.000.000 dengan suku bunga 6,5% dan jatuh tempo pada tanggal 3 April 2025 dan seri B dengan nilai sebesar Rp40.000.000 dengan suku bunga 7% dan jatuh tempo pada tanggal 3 April 2026.

Negotiable Certificate of Deposit (NCD) yang dijadikan sebagai jaminan tunai atas pinjaman yang diberikan pada tanggal 31 Desember 2024 dan 2023 masing-masing sebesar Rp131.000.000 dan Rp116.900.000 (Catatan 11).

18. DEPOSITS FROM CUSTOMERS (continued)

d. Negotiable Certificate Deposits (continued)

The bank issues a Negotiable Certificate of Deposit (NCD) on April 3, 2024, amounting to Rp110,000,000 which is divided into two series, namely series A with a value of Rp70,000,000 with an interest rate of 6.5% and due on April 3, 2025 and series B with a value of Rp40,000,000 with an interest rate of 7% and due on April 3, 2026.

Negotiable Certificate of Deposit *(NCD) which are pledged as collateral on loans as of December 31, 2024 and 2023 amounted to Rp131,000,000 and Rp116,900,000 respectively (Note 11).*

19. SIMPANAN DARI BANK LAIN

Semua simpanan dari bank lain adalah dalam mata uang Rupiah dan terdiri dari:

19. DEPOSITS FROM OTHER BANKS

All deposits from other banks are denominated in Rupiah and consist of:

	31 Desember/*December 31*,		
	2024	**2023**	
Giro	210.458.618	219.401.707	*Demand deposits*
Call money	205.000.000	792.000.000	*Call money*
Deposito berjangka	72.552.541	49.531.350	*Time deposits*
Negotiable certificate Deposits	50.000.000	-	*Negotiable certificate Deposits*
Dikurangi:			*Less:*
Diskonto	(820.857)	-	*Discount*
Beban emisi yang belum diamortisasi	(180.601)	-	*Unamortised issuance cost*
Tabungan	49.008.271	41.963.642	*Savings deposits*
Deposito *on call*	5.000.000	1.906.660	*Deposits on call*
Jumlah	**591.017.972**	**1.104.803.359**	***Total***

a. *Call money*

(i) Berdasarkan pihak lawan

a. Call money

(i) By counterparties

	31 Desember/*December 31*,		
	2024	**2023**	
Pihak ketiga			***Third parties***
PT Bank Pembangunan Daerah Daerah Istimewa Yogyakarta	75.000.000	150.000.000	*PT Bank Pembangunan Daerah Daerah Istimewa Yogyakarta*
PT Bank Sinarmas Tbk	50.000.000	-	*PT Bank Sinarmas Tbk*
PT Bank Pembangunan Daerah Jawa Tengah Tbk	50.000.000	-	*PT Bank Pembangunan Daerah Jawa Tengah Tbk*
PT Bank Multiarta Sentosa Tbk	30.000.000	-	*PT Bank Multiarta Sentosa Tbk*
PT Bank Pembangunan Daerah Kalimantan Timur dan Kalimantan Utara	-	200.000.000	*PT Bank Pembangunan Daerah Kalimantan Timur dan Kalimantan Utara*
PT Bank Pembangunan Daerah Sulawesi Tengah	-	220.000.000	*PT Bank Pembangunan Daerah Sulawesi Tengah*
PT Bank Ina Perdana Tbk	-	100.000.000	*PT Bank Ina Perdana Tbk*
PT Bank Pembangunan Daerah Jawa Timur Tbk	-	22.000.000	*PT Bank Pembangunan Daerah Jawa Timur Tbk*
PT Bank Pembangunan Daerah Maluku dan Maluku Utara	-	100.000.000	*PT Bank Pembangunan Daerah Maluku dan Maluku Utara*
Jumlah	**205.000.000**	**792.000.000**	***Total***

19. SIMPANAN DARI BANK LAIN (lanjutan) / *19. DEPOSITS FROM OTHER BANKS (continued)*

a. *Call money* (lanjutan) / *a. Call money (continued)*

(ii) Berdasarkan periode / *(ii) By period*

	31 Desember/*December 31*,		
	2024	**2023**	
Kurang dari 1 bulan	205.000.000	792.000.000	*Less than 1 month*
Jumlah	**205.000.000**	**792.000.000**	***Total***

b. Deposito berjangka / *b. Time deposits*

(i) Berdasarkan pihak lawan / *(i) By counterparties*

	31 Desember/*December 31*,		
	2024	**2023**	
Pihak ketiga	72.552.541	49.531.350	*Third parties*

Pada tanggal 31 Desember 2024 dan 2023, tidak terdapat saldo deposito dari pihak berelasi.

As of December 31, 2024 and 2023 there are no deposits account from related parties.

(ii) Berdasarkan periode / *(ii) By period*

	31 Desember/*December 31*,		
	2024	**2023**	
1 bulan	26.552.541	22.031.350	*1 month*
3 bulan	29.500.000	24.500.000	*3 months*
6 bulan	3.000.000	-	*6 months*
12 bulan	13.500.000	3.000.000	*12 months*
Jumlah	**72.552.541**	**49.531.350**	***Total***

(iii) Berdasarkan sisa umur sampai dengan jatuh tempo / *(iii) By remaining period until maturity*

	31 Desember/*December 31*,		
	2024	**2023**	
Kurang dari 1 bulan	27.552.541	22.031.350	*Less than 1 month*
1 sampai dengan 3 bulan	28.500.000	24.500.000	*1 up to 3 months*
3 sampai dengan 6 bulan	8.000.000	2.000.000	*3 up to 6 months*
6 sampai dengan 12 bulan	8.500.000	1.000.000	*6 up to 12 months*
Jumlah	**72.552.541**	**49.531.350**	***Total***

19. SIMPANAN DARI BANK LAIN (lanjutan) / *19. DEPOSITS FROM OTHER BANKS (continued)*

c. Giro / *c. Demand deposits*

Berdasarkan pihak lawan / ***By counterparties***

	31 Desember/*December 31*,		
	2024	**2023**	
Pihak berelasi (Catatan 39)	532.305	478.732	*Related parties (Note 39)*
Pihak ketiga	209.926.313	218.922.975	*Third parties*
Jumlah	**210.458.618**	**219.401.707**	***Total***

Informasi mengenai tingkat suku bunga diungkapkan pada Catatan 44.

Informations in respect to interest rates are disclosed in Note 44.

d. Tabungan / *d. Saving deposits*

Berdasarkan pihak lawan / ***By counterparties***

	31 Desember/*December 31*,		
	2024	**2023**	
Pihak ketiga	49.008.271	41.963.642	*Third parties*

Pada tanggal 31 Desember 2024 dan 2023, tidak terdapat saldo tabungan dari pihak berelasi.

As of December 31, 2024 and 2023 there are no saving deposits from related parties.

Informasi mengenai tingkat suku bunga diungkapkan pada Catatan 44.

Informations in respect to interest rates are disclosed in Note 44.

e. Deposito *on call* / *e. Deposits on call*

Berdasarkan pihak lawan / ***By counterparties***

	31 Desember/*December 31*,		
	2024	**2023**	
Pihak ketiga	5.000.000	1.906.660	*Third parties*

Pada tanggal 31 Desember 2024 dan 2023, tidak terdapat saldo deposito *on call* dari pihak berelasi.

As of December 31, 2024 and 2023 there are no deposits on call from related parties.

Informasi mengenai tingkat suku bunga diungkapkan pada Catatan 44.

Informations in respect to interest rates are disclosed in Note 44.

19. SIMPANAN DARI BANK LAIN (lanjutan) / *19. DEPOSITS FROM OTHER BANKS (continued)*

f. *Negotiable Certificate Deposits*

Berdasarkan pihak lawan / ***By counterparties***

	31 Desember/*December 31*, 2024	31 Desember/*December 31*, 2023	
Pihak ketiga			***Third parties***
Negotiable Certificate Deposit	50.000.000	-	*Negotiable Certificate Deposits*
Dikurangi :			*Less*:
Diskonto	(820.857)	-	*Discount*
Beban emisi yang belum diamortisasi	(180.601)	-	*Unamortised issuance cost*
Jumlah	**48.998.542**	**-**	***Total***

Pada tanggal 31 Desember 2024 dan 2023, tidak terdapat saldo *Negotiable Certificate Deposits* (NCD) dari pihak berelasi.

As of December 31, 2024 and 2023 there are no Negotiable Certificate Deposits (NCD) from related parties.

Informasi mengenai tingkat suku bunga diungkapkan pada Catatan 44.

Informations in respect to interest rates are disclosed in Note 44.

20. EFEK-EFEK YANG DIJUAL DENGAN JANJI DIBELI KEMBALI / *20. SECURITIES SOLD UNDER REPURCHASED AGREEMENTS*

Efek-efek yang dijual dengan janji dibeli kembali pada tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut:

The securities sold under repurchased agreements as of December 31, 2024 and 2023 are as follows:

31 Desember / *December 31*, 2024

Pihak lawan/ *Counterparty*	Jenis efek/ *Type of Securities*	Nilai Nominal/ *Notional amount*	Tingkat suku bunga/ *Interest rate*	Tanggal dimulai/ *Commencement date*	Tanggal jatuh tempo/ *Maturity date*	Nilai tercatat/ *Carrying amount*
Bank BRI	FR0059	100.000.000	6,55%	4 Desember/ *December* 2024	2 Januari/ *January 2025*	95.919.400
Bank BRI	FR0059	100.000.000	6,55%	4 Desember/ *December* 2024	2 Januari/ *January 2025*	95.919.400
Bank BRI	FR0081	100.000.000	6,55%	9 Desember/ *December* 2024	6 Januari/ *January 2025*	101.024.400
Bank BRI	FR0081	100.000.000	6,55%	9 Desember/ *December* 2024	6 Januari/ *January 2025*	101.024.400
Bank BRI	FR0059	100.000.000	6,55%	10 Desember/ *December* 2024	7 Januari/ *January 2025*	95.718.400
Bank BNI	FR0081	100.000.000	6,65%	20 Desember/ *December* 2024	20 Januari/ *January 2025*	97.869.014
Jumlah/*Total*		**600.000.000**				**587.475.014**

31 Desember / *December 31*, 2023

Pihak lawan/ *Counterparty*	Jenis efek/ *Type of Securities*	Nilai Nominal/ *Notional amount*	Tingkat suku bunga/ *Interest rate*	Tanggal dimulai/ *Commencement date*	Tanggal jatuh tempo/ *Maturity date*	Nilai tercatat/ *Carrying amount*
Bank Mega	FR0070	250.000.000	6,35%	20 Desember/ *December* 2023	3 Januari/ *January* 2024	251.618.623
Bank Mega	FR0077	250.000.000	6,35%	20 Desember/ *December* 2023	3 Januari/ *January* 2024	248.598.483
Bank Ina Perdana	FR0081	100.000.000	6,25%	29 Desember/ *December* 2023	3 Januari/ *January* 2024	95.366.417
Bank Ina Perdana	FR0081	50.000.000	6,25%	29 Desember/ *December* 2023	3 Januari/ *January* 2024	47.683.207
Jumlah/*Total*		**650.000.000**				**643.266.730**

21. EFEK-EFEK YANG DITERBITKAN / *21. SECURITIES ISSUED*

	31 Desember/*December 31*,		
	2024	**2023**	
Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017	-	50.000.000	*Bank Victoria Subordinated Bonds I Phase I Year 2017*
Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018	350.000.000	350.000.000	*Bank Victoria Subordinated Bonds I Phase II Year 2018*
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019	250.000.000	250.000.000	*Bank Victoria Subordinated Bonds II Phase I Year 2019*
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019	150.000.000	150.000.000	*Bank Victoria Subordinated Bonds II Phase II Year 2019*
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020	60.000.000	60.000.000	*Bank Victoria Subordinated Bonds II Phase III Year 2020*
Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 Seri A	300.000.000	300.000.000	*Bank Victoria Continuing Bonds III Phase I Year 2023 Series A*
Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 Seri B	200.000.000	200.000.000	*Bank Victoria Continuing Bonds III Phase I Year 2023 Series B*
Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap I Tahun 2024	500.000.000	-	*Bank Victoria Subordinated Bonds III Phase I Year 2024*
Obligasi Berkelanjutan III Bank Victoria Tahap II Tahun 2024	500.000.000	-	*Bank Victoria Continuing Bonds III Phase II Year 2024*
Jumlah	**2.310.000.000**	**1.360.000.000**	***Total***
Dikurangi: Biaya emisi yang belum diamortisasi	(20.587.351)	(12.360.472)	*Less: Unamortised issuance cost*
Jumlah - bersih	**2.289.412.649**	**1.347.639.528**	***Total - net***

Berdasarkan pihak lawan / *By counterparties*

	31 Desember/*December 31*,		
	2024	**2023**	
Pihak berelasi (Catatan 39)	147.885.000	92.730.000	*Related parties (Note 39)*
Pihak ketiga	2.162.115.000	1.267.270.000	*Third parties*
Jumlah	**2.310.000.000**	**1.360.000.000**	***Total***
Dikurangi: Biaya emisi yang belum diamortisasi	(20.587.351)	(12.360.472)	*Less: Unamortised issuance cost*
Jumlah - bersih	**2.289.412.649**	**1.347.639.528**	***Total - net***

21. EFEK-EFEK YANG DITERBITKAN (lanjutan)

Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap I Tahun 2024

Pada tanggal 12 Juli 2024 Bank menerbitkan Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap I Tahun 2024 dengan jumlah pokok sebanyak-banyaknya sebesar Rp500.000.000.

Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap I Tahun 2024 memiliki tingkat suku bunga tetap sebesar 10,75% per tahun yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran bunga Obligasi Subordinasi pertama dilakukan pada tanggal 12 Oktober 2024, sedangkan pembayaran bunga Obligasi Subordinasi terakhir akan dilakukan pada tanggal jatuh tempo Obligasi Subordinasi yaitu pada tanggal 12 Juli 2029.

Berdasarkan hasil pemeringkatan surat utang jangka panjang sesuai dengan surat PT Pemeringkat Efek Indonesia (Pefindo) No.RC-368/PEF-DIR/IV/2024 tanggal 2 April 2024 perihal Sertifikat Obligasi Subordinasi Berkelanjutan III PT Bank Victoria International Tbk periode 2 April 2024 sampai dengan 1 April 2025, hasil pemeringkatan Obligasi Subordinasi adalah idBBB.

Obligasi Berkelanjutan III Bank Victoria Tahap II Tahun 2024

Pada tanggal 12 Juli 2024 Bank menerbitkan Obligasi Berkelanjutan III Bank Victoria Tahap II Tahun 2024 dengan jumlah pokok sebanyak-banyaknya sebesar Rp500.000.000.

Obligasi Berkelanjutan III Bank Victoria Tahap II Tahun 2024 memiliki tingkat suku bunga tetap sebesar 9,50% per tahun yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran bunga Obligasi pertama dilakukan pada tanggal 12 Oktober 2024, sedangkan pembayaran bunga Obligasi terakhir akan dilakukan pada tanggal jatuh tempo Obligasi yaitu pada tanggal 12 Juli 2027.

Berdasarkan hasil pemeringkatan surat utang jangka panjang sesuai dengan surat PT Pemeringkat Efek Indonesia (Pefindo) No.RC-368/PEF-DIR/IV/2024 tanggal 2 April 2024 perihal Sertifikat Obligasi Subordinasi Berkelanjutan III PT Bank Victoria International Tbk periode 2 April 2024 sampai dengan 1 April 2025, hasil pemeringkatan Obligasi adalah idA-.

21. SECURITIES ISSUED (continued)

Bank Victoria Subordinated Bonds III Phase I Year 2024

On July 12, 2024, the Bank issued Bank Victoria Subordinated Bonds III Phase I Year 2024 with a principal amount up to Rp500,000,000.

Bank Victoria Subordinated Bonds III Phase I Year 2024 has fixed rate of 10.75% per annum, and the interest will be paid every 3 (three) months starting from October 12, 2024 for the first payment whereas the last payment will be on July 12, 2029 at the maturity date of the Bond.

Based on the results of the rating for long-term debt securities in accordance with PT Pemeringkat Efek Indonesia (Pefindo) letter No.RC-368/PEF-DIR/IV/2024 dated April 2, 2024 regarding a Rating Certificate for Continuous Subordinated Bond III of PT Bank Victoria International Tbk from April 2, 2024 to April 1, 2025, the rating results of the Subordinated Bonds are idBBB.

Bank Victoria Continuing Bonds III Phase II Year 2024

On July 12, 2024, the Bank issued Bank Victoria Continuing Bonds III Phase II Year 2024 with a principal amount up to Rp500,000,000.

Bank Victoria Continuing Bonds III Phase II Year 2024 has fixed rate of 9.50% per annum, and the interest will be paid every 3 (three) months starting from October 12, 2024 for the first payment whereas the last payment will be on July 12, 2027 at the maturity date of the Bond.

Based on the results of the rating for long-term debt securities in accordance with PT Pemeringkat Efek Indonesia (Pefindo) letter No.RC-368/PEF-DIR/IV/2024 dated April 2, 2024 regarding a Rating Certificate for Continuous Subordinated Bond III of PT Bank Victoria International Tbk from April 2, 2024 to April 1, 2025, the rating results of the Bonds are idA-.

21. EFEK-EFEK YANG DITERBITKAN (lanjutan)

Obligasi Berkelanjutan III Bank Victoria Tahap II Tahun 2024 (lanjutan)

Selaku Wali Amanat dari penerbitan obligasi ini adalah PT Bank Mega Tbk.

Tidak terdapat pelanggaran atas pembatasan perjanjian perwaliamanatan obligasi dan obligasi subordinasi pada tanggal 31 Desember 2024.

Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023

Pada tanggal 10 Maret 2023, Bank menerbitkan Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 sebesar Rp500.000.000.

Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 terdiri dari 2 (dua) seri Obligasi, yaitu sebagai berikut:

- Seri A dengan jumlah Pokok Obligasi sebesar Rp300.000.000 dengan tingkat suku bunga tetap sebesar 9,25% per tahun, berjangka waktu 3 (tiga) tahun sejak Tanggal Emisi.
- Seri B dengan jumlah Pokok Obligasi sebesar Rp200.000.000 dengan tingkat bunga tetap sebesar 10,25% per tahun, berjangka waktu 5 (lima) tahun sejak Tanggal Emisi.

Bunga obligasi dibayarkan setiap 3 (tiga) bulan sekali. Pembayaran bunga obligasi pertama dilakukan pada tanggal 9 Juni 2023 sedangkan pembayaran bunga Obligasi terakhir akan dilakukan pada tanggal jatuh tempo masing-masing seri Obligasi yaitu pada tanggal 9 Maret 2026 untuk Obligasi Seri A dan 9 Maret 2028 untuk Obligasi Seri B.

Berdasarkan pemeringkatan yang dilaksanakan oleh Pefindo sesuai dengan Surat No.RC-1230/PEF-DIR/XII/2022 tanggal 26 Desember 2022 tentang Sertifikat Pemeringkatan atas Obligasi Berkelanjutan III Bank Victoria Tahun 2023 periode 26 Desember 2022 sampai dengan 1 Desember 2023, hasil pemeringkatan atas Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 adalah idA-.

Pada tanggal 31 Desember 2024 dan 2023, peringkat Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 menurut Pefindo adalah idA-.

Obligasi dan obligasi subordinasi tersebut di atas tidak dijamin dengan suatu agunan khusus dan tidak dijamin oleh pihak ketiga manapun dan tidak termasuk dalam Program Jaminan Pemerintah Terhadap Liabilitas Pembayaran Bank Umum.

21. SECURITIES ISSUED (continued)

Bank Victoria Continuing Bonds III Phase II Year 2024 (continued)

The Trustee of the bond issuance is PT Bank Mega Tbk.

There was no violation to the covenant of bonds and subordinated bonds trusteeship agreement as of December 31, 2024.

Bank Victoria Continuing Bonds III Phase I Year 2023

On March 10, 2023, the Bank issued Bank Victoria Continuing Bonds III Phase I Year 2023 amounting to Rp500,000,000.

Bank Victoria Continuing Bonds III Phase I Year 2023 consists of 2 (two) series of Bonds:

- *Series A amounted to Rp300,000,000 with fixed rate of 9.25% per annum, tenor 3 (three) years since Emission Date.*
- *Series B amounted to Rp200,000,000 with fixed rate of 10.25% per annum, tenor 5 (five) years since Emission Date.*

Interest of the bond paid every 3 (three) months starting from June 9, 2023 for the first payment whereas the last payment will be at the maturity date of each Bonds, which on March 9, 2026 for Bonds Series A and on March 9, 2028 for Bonds Series B.

Based on the ranking carried out by Pefindo in accordance with Letter No.RC-1230/PEF-DIR/XII/2022 dated December 26, 2022, regarding the Rating Certificate for the third phase of Bank Victoria Continuing Bonds Year 2023, for the period of December 26, 2022, to December 1, 2023, the result of the ranking for the first phase of Bank Victoria Continuing Bonds III for 2023 is idA-.

As of December 31, 2024 and 2023, the rating of the Bank Victoria Continuing Bonds III Phase I Year 2023 based on Pefindo was idA-.

The above bonds and subordinated bonds are unsecured by a specific collateral and by third parties and are excluded from the Government Guarantee to Certain Liabilities of Commercial Banks Program.

21. EFEK-EFEK YANG DITERBITKAN (lanjutan)

Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 (lanjutan)

Selaku Wali Amanat dari penerbitan obligasi ini adalah PT Bank Mega Tbk.

Tidak terdapat pelanggaran atas pembatasan perjanjian perwaliamanatan obligasi dan obligasi subordinasi pada tanggal 31 Desember 2024 dan 2023.

Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020

Pada tanggal 13 Maret 2020 Bank menerbitkan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020 dengan jumlah pokok sebanyak-banyaknya sebesar Rp60.000.000.

Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020 memiliki tingkat suku bunga tetap sebesar 11,25% per tahun yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran bunga Obligasi Subordinasi pertama dilakukan pada tanggal 1 Juli 2020, sedangkan pembayaran bunga Obligasi Subordinasi terakhir akan dilakukan pada tanggal jatuh tempo Obligasi Subordinasi yaitu pada tanggal 1 April 2027.

Berdasarkan hasil pemeringkatan surat utang jangka panjang sesuai dengan surat PT Pemeringkat Efek Indonesia (Pefindo) No. RC-329/PEF-DIR/IV/2019 tanggal 4 April 2019 tentang Sertifikat Pemeringkatan Obligasi Subordinasi Berkelanjutan II dari PT Bank Victoria International Tbk sejak 4 April 2019 sampai dengan 1 April 2020, serta konfirmasi sesuai dengan surat Pefindo No. RTG-020/PEF-DIR/II/2020 tanggal 4 Februari 2020 perihal Sertifikat Pemeringkatan Obligasi Subordinasi Berkelanjutan II Tahap III yang diterbitkan melalui rencana Penawaran Umum Berkelanjutan PUB, hasil pemeringkatan Obligasi Subordinasi adalah idBBB.

Pada tanggal 31 Desember 2024 dan 2023, peringkat Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020 menurut Pefindo adalah idBBB.

Obligasi subordinasi di atas tidak dijamin dengan suatu agunan khusus dan tidak dijamin oleh pihak ketiga manapun dan tidak termasuk dalam Program Jaminan Pemerintah Terhadap Liabilitas Pembayaran Bank Umum.

Selaku Wali Amanat dari penerbitan obligasi subordinasi ini adalah PT Bank Mega Tbk. Tidak terdapat pelanggaran atas pembatasan perjanjian perwaliamanatan obligasi dan obligasi subordinasi pada tanggal 31 Desember 2024 dan 2023.

21. SECURITIES ISSUED (continued)

Bank Victoria Continuing Bonds III Phase I Year 2023 (continued)

The Trustee of the bond issuance is PT Bank Mega Tbk.

There was no violation to the covenant of bonds and subordinated bonds trusteeship agreement as of December 31, 2024 and 2023.

Bank Victoria Subordinated Bonds II Phase III Year 2020

On March 13, 2020, the Bank issued Bank Victoria Subordinated Bonds II Phase III Year 2020 with a principal amount up to Rp60,000,000.

Bank Victoria Subordinated Bonds II Phase III Year 2020 has fixed rate of 11.25% per annum, and the interest will be paid every 3 (three) months starting from July 1, 2020 for the first payment whereas the last payment will be on April 1, 2027, at the maturity date of the Bond.

Based on the results of the rating for long-term debt securities in accordance with PT Pemeringkat Efek Indonesia (Pefindo) letter No. RC-329/PEF-DIR/IV/2019 dated April 4, 2019 regarding a Rating Certificate for Continuous Subordinated Bond II of PT Bank Victoria International Tbk from April 4, 2019 to April 1, 2020, as well as the confirmation according to Pefindo letter No. RTG-020/PEF-DIR/II/2020 dated February 4, 2020 regarding the Rating Certificate for Continuous Subordinated Bonds II Phase III issued through the PUB Continuous Public Offering plan, the rating results of the Subordinated Bonds are idBBB.

As of December 31, 2024 and 2023, the rating of the Bank Victoria Subordinated Bonds II Phase III Year 2020 based on Pefindo was idBBB.

The subordinated bonds is unsecured by a specific collateral and by third parties and are excluded from the Government Guarantee to Certain Liabilities of Commercial Banks Program.

The Trustee of the bond issuance is PT Bank Mega Tbk. There was no violation to the covenant of bonds and subordinated bonds trusteeship agreement as of December 31, 2024 and 2023.

21. EFEK-EFEK YANG DITERBITKAN (lanjutan)

Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019

Pada tanggal 8 November 2019, Bank menerbitkan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019 sebesar Rp150.000.000.

Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019 memiliki tingkat suku bunga tetap sebesar 11,25% per tahun yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran bunga Obligasi Subordinasi pertama dilakukan pada tanggal 8 Februari 2020, sedangkan pembayaran bunga Obligasi Subordinasi terakhir akan dilakukan pada tanggal jatuh tempo Obligasi Subordinasi yaitu pada tanggal 8 November 2026.

Berdasarkan Surat Keterangan PT Pemeringkat Efek Indonesia ("Pefindo") No. RTG-129/PEF-DIR/IX/2019 tanggal 26 September 2019 berlaku peringkat sebagaimana tercantum pada Sertifikat Pemeringkatan PT Pemeringkat Efek Indonesia No. RC-329/PEF-DIR/IV/2019 tanggal 4 April 2019 yaitu peringkat idBBB pada Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019.

Pada tanggal 31 Desember 2024 dan 2023, peringkat Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019 menurut Pefindo adalah idBBB.

Obligasi subordinasi tersebut di atas tidak dijamin dengan suatu agunan khusus dan tidak dijamin oleh pihak ketiga manapun dan tidak termasuk dalam Program Jaminan Pemerintah Terhadap Liabilitas Pembayaran Bank Umum.

Selaku Wali Amanat dari penerbitan obligasi subordinasi ini adalah PT Bank Mega Tbk. Tidak terdapat pelanggaran atas pembatasan perjanjian perwaliamanatan obligasi subordinasi pada tanggal 31 Desember 2024 dan 2023.

21. SECURITIES ISSUED (continued)

Bank Victoria Subordinated Bonds II Phase II Year 2019

On November 8, 2019, the Bank issued Bank Victoria Subordinated Bonds II Phase II Year 2019 amounting Rp150,000,000.

Bank Victoria Subordinated Bonds II Phase II Year 2019 has fixed rate of 11.25% per annum, and the interest will be paid every 3 (three) months starting from February 8, 2020 for the first payment whereas the last payment will be on November 8, 2026, at the maturity date of the Bond.

Based on the letter issued by PT Pemeringkat Efek Indonesia ("Pefindo") No. RTG-129/PEF-DIR/IX/2019 dated September 26, 2019 apply rating as stated on Rating Certificate PT Pemeringkat Efek Indonesia No. RC-329/PEF-DIR/IV/2019 dated April 4, 2019 which was idBBB on Bank Victoria Subordinated Bonds II Phase II Year 2019.

As of December 31, 2024 and 2023, the rating of the Bank Victoria Subordinated Bonds II Phase II Year 2019 based on Pefindo was idBBB.

The above bond is unsecured by a specific collateral and by third parties and are excluded from the Government Guarantee to Certain Liabilities of Commercial Banks Program.

The Trustee of the bond issuance is PT Bank Mega Tbk. There was no violation to the covenant of the subordinated bonds trusteeship agreement as of December 31, 2024 and 2023.

21. EFEK-EFEK YANG DITERBITKAN (lanjutan)

Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 dan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019

Pada tanggal 28 September 2019, Bank menerbitkan Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 dan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 masing-masing sebesar Rp100.000.000 dan Rp250.000.000.

Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 diterbitkan dengan tingkat suku bunga tetap sebesar 9,75% per tahun, berjangka waktu 2 (dua) tahun sejak Tanggal Emisi.

Bunga obligasi dibayarkan setiap 3 (tiga) bulan sekali terhitung sejak Tanggal Emisi. Pembayaran Bunga Obligasi pertama dilakukan pada tanggal 28 September 2019, sedangkan pembayaran Bunga obligasi terakhir akan dilakukan pada tanggal jatuh tempo obligasi yaitu pada tanggal 28 September 2021.

Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 memiliki tingkat suku bunga tetap sebesar 11,75% per tahun yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran Bunga Obligasi Subordinasi pertama dilakukan pada tanggal 28 September 2019, sedangkan pembayaran Bunga Obligasi Subordinasi terakhir akan dilakukan pada tanggal jatuh tempo Obligasi Subordinasi yaitu pada tanggal 28 Juni 2026.

Berdasarkan Sertifikat Pemeringkatan Pefindo No. RC-328/PEF-DIR/IV/2019 dan No. RC-329/PEF-DIR/IV/2019 tanggal 4 April 2019, memutuskan memberikan peringkat idA- terhadap Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 serta memberikan peringkat idBBB pada Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019.

Pada tanggal 31 Desember 2021, peringkat Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 menurut Pefindo adalah idA-.

Pada tanggal 31 Desember 2024 dan 2023, peringkat Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 menurut Pefindo adalah idBBB.

Obligasi dan obligasi subordinasi tersebut di atas tidak dijamin dengan suatu agunan khusus dan tidak dijamin oleh pihak ketiga manapun dan tidak termasuk dalam Program Jaminan Pemerintah Terhadap Liabilitas Pembayaran Bank Umum.

21. SECURITIES ISSUED (continued)

Bank Victoria Continuing Bonds II Phase I Year 2019 and Subordinated Bonds II Phase I Year 2019

On September 28, 2019, the Bank issued Bank Victoria Continuing Bonds II Phase I Year 2019 and Subordinated Bonds II Phase I Year 2019 amounting to Rp100,000,000 and Rp250,000,000, respectively.

Bank Victoria Continuing Bonds II Phase I Year 2019 issued with fixed rate of 9.75% per annum, with tenor 2 (two) years since Emission Date.

Interest on the bonds will be paid every 3 (three) months starting from Emission Date. The first payment was on September 28, 2019 whereas the last payment will be on September 28, 2021, at the maturity date of the Bond.

Bank Victoria Subordinated Bonds II Phase I Year 2019 has fixed rate of 11.75% per annum, and the interest will be paid every 3 (three) months. The first payment was on September 28, 2019, whereas the last payment will be on June 28, 2026, at the maturity date of the Bond.

Based on the report issued by Pefindo No. RC-328/PEF-DIR/IV/2019 and No. RC-329/PEF-DIR/IV/2019 dated April 4, 2019, the rating of Bank Victoria Continuing Bonds II Phase I Year 2019 is idA-, and the rating of Subordinated Bonds II Phase I Year 2019 is idBBB.

As of December 31, 2021, the rating of the Bank Victoria Continuing Bonds II Phase I Year 2019 based on Pefindo was idA-.

As of December 31, 2024 and 2023, the rating of the Bank Victoria Subordinated Bonds II Phase I Year 2019 based on Pefindo was idBBB.

The above bonds and subordinated bonds are unsecured by a specific collateral and by third parties and are excluded from the Government Guarantee to Certain Liabilities of Commercial Banks Program.

21. EFEK-EFEK YANG DITERBITKAN (lanjutan)

Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 dan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 (lanjutan)

Selaku Wali Amanat dari penerbitan obligasi dan obligasi subordinasi ini adalah PT Bank Mega Tbk.

Tidak terdapat pelanggaran atas pembatasan perjanjian perwaliamanatan obligasi dan obligasi subordinasi pada tanggal 31 Desember 2024 dan 2023.

Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dan Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II 2018

Pada tanggal 5 September 2018, Bank menerbitkan Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dan Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 masing-masing sebesar Rp300.000.000 dan Rp350.000.000.

Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 terdiri dari 2 (dua) seri Obligasi, yaitu sebagai berikut:

- Seri A dengan jumlah Pokok Obligasi sebesar Rp100.000.000 dengan tingkat suku bunga tetap sebesar 9,70% per tahun, berjangka waktu 3 (tiga) tahun sejak Tanggal Emisi.
- Seri B dengan jumlah Pokok Obligasi sebesar Rp200.000.000 dengan tingkat bunga tetap sebesar 10,30% per tahun, berjangka waktu 5 (lima) tahun sejak Tanggal Emisi.

Bunga obligasi dibayarkan setiap 3 (tiga) bulan sekali. Pembayaran bunga obligasi pertama dilakukan pada tanggal 5 September 2018 sedangkan pembayaran bunga Obligasi terakhir sekaligus telah jatuh tempo masing-masing seri Obligasi yaitu pada tanggal 5 September 2021 untuk Obligasi Seri A dan 5 September 2023 untuk Obligasi Seri B.

Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 memiliki tingkat suku bunga tetap sebesar 11,00% per tahun yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran Bunga Obligasi Subordinasi pertama dilakukan pada tanggal 5 September 2018, sedangkan pembayaran Bunga Obligasi Subordinasi terakhir akan dilakukan pada tanggal jatuh tempo Obligasi Subordinasi yaitu pada tanggal 5 Juni 2025.

21. SECURITIES ISSUED (continued)

Bank Victoria Continuing Bonds II Phase I Year 2019 and Subordinated Bonds II Phase I Year 2019 (continued)

The Trustee of the bonds and subordinated bonds issuance is PT Bank Mega Tbk.

There was no violation to the covenant of the bonds and subordinated bonds trusteeship agreement as of December 31, 2024 and 2023.

Bank Victoria Continuing Bonds I Phase II Year 2018 and Subordinated Bonds I Phase II Year 2018

On September 5, 2018, the Bank issued Bank Victoria Continuing Bonds I Phase II Year 2018 and Bank Victoria Subordinated Bonds I Phase II Year 2018 amounting to Rp300,000,000 and Rp350,000,000, respectively.

Bank Victoria Continuing Bonds I Phase II Year 2018 consists of 2 (two) series of Bonds:

- *Series A amounted to Rp100,000,000 with fixed rate of 9.70% per annum, tenor 3 (three) years since Emission Date.*
- *Series B amounted to Rp200,000,000 with fixed rate of 10.30% per annum, tenor 5 (five) years since Emission Date.*

Interest of the bond paid every 3 (three) months starting from September 5, 2018 for the first payment whereas the last payment matured of each Bonds, which on September 5, 2021 for Bonds Series A and on September 5, 2023 for Bonds Series B, at the maturity date of the Bond.

Bank Victoria Subordinated Bonds I Phase II Year 2018 has fixed rate of 11.00% per annum, and the interest will be paid every 3 (three) months. The first payment was on September 5, 2018 whereas the last payment will be on June 5, 2025, at the maturity date of the Bonds and Subordinated Bonds.

21. EFEK-EFEK YANG DITERBITKAN (lanjutan)

Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dan Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II 2018 (lanjutan)

Berdasarkan surat keterangan yang diberikan oleh Pefindo No. 031/PEWF-DIR/IV/2018 pada 2 April 2018, keterangan terkait pemeringkatan atas Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dan Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 yang diterbitkan melalui rencana Penawaran Umum Berkelanjutan (PUB) terdapat pada surat Sertifikat Pemeringkatan No. 369/PEF-DIR/IV/2018 tanggal 2 April 2018 atas penetapan kembali peringkat Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 yang juga merupakan pemeringkatan atas Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 (berdasarkan pemantauan atas Obligasi Berkelanjutan I Tahun 2017) yakni idA- dan pada surat Sertifikat Pemeringkatan No. 370/PEF-DIR/IV/2018 tanggal 2 April 2018 atas Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I 2017 yang juga merupakan pemeringkatan atas Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II 2018 yakni idBBB.

Pada tanggal 31 Desember 2024 dan 2023, peringkat Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 menurut Pefindo adalah idA-.

Pada tanggal 31 Desember 2024 dan 2023, peringkat Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II 2018 menurut Pefindo adalah idBBB.

Obligasi dan obligasi subordinasi tersebut di atas tidak dijamin dengan suatu agunan khusus dan tidak dijamin oleh pihak ketiga manapun dan tidak termasuk dalam Program Jaminan Pemerintah Terhadap Liabilitas Pembayaran Bank Umum.

Selaku Wali Amanat dari penerbitan ini adalah PT Bank Mega Tbk.

Tidak terdapat pelanggaran atas pembatasan perjanjian perwaliamanatan obligasi dan obligasi subordinasi pada tanggal 31 Desember 2024 dan 2023.

Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 dan Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017

Pada tanggal 11 Juli 2017, Bank menerbitkan Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 dan Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 masing-masing sebesar Rp300.000.000 dan Rp50.000.000.

21. SECURITIES ISSUED (continued)

Bank Victoria Continuing Bonds I Phase II Year 2018 and Subordinated Bonds I Phase II Year 2018 (continued)

Based on the letter issued by Pefindo No. 031/PEWF-DIR/IV/2018 dated April 2, 2018, the details related to the rating of Bank Victoria Continuing Bonds I Phase II Year 2018 and Bank Victoria Subordinated Bonds I Phase II Year 2018 which was issued through Share Registration Public Offering (PUB) were available in the Rating Certificate No. 369/PEF-DIR/IV/2018 dated April 2, 2018 regarding the reassessment of Bank Victoria Continuing Bonds I Phase I Year 2017 rating, including the assessment of Bank Victoria Continuing Bonds I Phase II Year 2018 rating which was idA- and in the Rating Certificate No. 370/PEF-DIR/IV/2018 dated April 2, 2018 regarding the reassessment of Bank Victoria Subordinated Bonds I Phase I Year 2017, including the assessment of Bank Victoria Subordinated Bonds I Phase II Year 2018 which was idBBB.

As of December 31, 2024 and 2023, the rating of the Bank Victoria Continuing Bonds I Phase II Year 2018 based on Pefindo was idA-.

As of December 31, 2024 and 2023, the rating of the Bank Victoria Subordinated Bonds I Phase II Year 2018 based Pefindo was idBBB.

The above bonds and subordinated bonds are unsecured by a specific collateral and by third parties and are excluded from the Government Guarantee to Certain Liabilities of Commercial Banks Program.

The Trustee of the bond issuance is PT Bank Mega Tbk.

There was no violation to the covenant of bonds and subordinated bonds trusteeship agreement as of December 31, 2024 and 2023.

Bank Victoria Continuing Bonds I Phase I Year 2017 and Subordinated Bonds I Phase I Year 2017

On July 11, 2017, the Bank issued Bank Victoria Continuing Bonds I Phase I Year 2017 and Bank Victoria Subordinated Bonds I Phase I Year 2017 amounting to Rp300,000,000 and Rp50,000,000, respectively.

21. EFEK-EFEK YANG DITERBITKAN (lanjutan)

Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 dan Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 (lanjutan)

Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 memiliki tingkat suku bunga tetap sebesar 10,30% sebesar Rp300.000.000 per tahun, yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran bunga pertama dilakukan pada tanggal 11 Oktober 2017 sedangkan pembayaran bunga obligasi terakhir yang sekaligus telah jatuh tempo obligasi akan dilakukan pada tanggal 11 Juli 2022.

Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 memiliki tingkat suku bunga tetap sebesar 11,00% per tahun, yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran bunga pertama dilakukan pada tanggal 11 Oktober 2017 sedangkan pembayaran bunga obligasi terakhir yang sekaligus menjadi tanggal jatuh tempo obligasi akan dilakukan pada tanggal 11 Juli 2024.

Berdasarkan pemeringkatan yang dilaksanakan oleh Pefindo sesuai dengan Surat No. 369/PEF-Dir/IV/2018 tanggal 2 April 2018, hasil pemeringkatan atas Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 adalah idA- dan Surat No. 370/PEF-Dir/IV/2018 tanggal 2 April 2018, hasil pemeringkatan atas Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 adalah idBBB.

Pada tanggal 31 Desember 2021, peringkat Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 menurut Pefindo adalah idA-.

Pada tanggal 31 Desember 2024 dan 2023, peringkat Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I 2017 menurut Pefindo adalah idBBB.

Obligasi dan obligasi subordinasi tersebut di atas tidak dijamin dengan suatu agunan khusus dan tidak dijamin oleh pihak ketiga manapun dan tidak termasuk dalam Program Jaminan Pemerintah Terhadap Liabilitas Pembayaran Bank Umum.

Selaku Wali Amanat dari penerbitan obligasi ini adalah PT Bank Mega Tbk.

Tidak terdapat pelanggaran atas pembatasan perjanjian perwaliamanatan obligasi dan obligasi subordinasi pada tanggal 31 Desember 2024 dan 2023.

21. SECURITIES ISSUED (continued)

Bank Victoria Continuing Bonds I Phase I Year 2017 and Subordinated Bonds I Phase I Year 2017 (continued)

Bank Victoria Continuing Bonds I Phase I Year 2017 has fixed rate of 10.30% amounted Rp300.000.000 per annum, and the interest will be paid every 3 (three) months. The first payment was on from October 11, 2017 whereas the last payment matured on July 11, 2022, at the maturity date of the Bond.

Bank Victoria Subordinated Bonds I Phase I Year 2017 has fixed rate of 11.00% per annum, and the interest will be paid every 3 (three) months. The first payment was on October 11, 2017 whereas the last payment will be on July 11, 2024, at the maturity date of the Bond.

Based on the report issued by Pefindo as stated in its Letter No. 369/PEF-Dir/IV/2018 dated April 2, 2018, the rating of Bank Victoria Continuing Bonds I Phase I Year 2017 is idA- and Letter No. 370/PEF-Dir/IV/2018 dated April 2, 2018, the rating of Bank Victoria Subordinated Bonds I Phase I Year 2017 is idBBB.

As of December 31, 2021, the rating of the Bank Victoria Continuing Bonds I Phase I Year 2017 based on Pefindo was idA-.

As of December 31, 2024 and 2023, the rating of the Bank Victoria Subordinated Bonds I Phase I Year 2017 based on Pefindo was idBBB.

The above bonds and subordinated bonds are unsecured by a specific collateral and by third parties and are excluded from the Government Guarantee to Certain Liabilities of Commercial Banks Program.

The Trustee of the bond issuance is PT Bank Mega Tbk.

There was no violation to the covenant of bonds and subordinated bonds trusteeship agreement as of December 31, 2024 and 2023.

22. PERPAJAKAN / *22. TAXATION*

a. Utang pajak / *a. Taxes payable*

	31 Desember/*December 31*,		
	2024	**2023**	
Pasal 4 ayat 2	24.531.464	20.806.149	*Article 4 (2)*
Pasal 21	1.750.164	2.591.590	*Article 21*
Pasal 26	51.727	51.349	*Article 26*
Pasal 23	41.752	18.381	*Article 23*
Pajak Pertambahan Nilai	76.872	5.842.973	*Value Added Tax*
Jumlah utang pajak	**26.451.979**	**29.310.442**	***Total taxes payable***

b. Beban Pajak Penghasilan / *b. Deferred Tax Expense*

Beban pajak penghasilan terdiri dari: / *Deferred tax expense consist of:*

	31 Desember/*December 31*,		
	2024	**2023**	
Pajak kini	-	-	*Current tax*
Pajak tangguhan	30.800.886	27.719.887	*Deferred tax*
Jumlah beban pajak penghasilan	**30.800.886**	**27.719.887**	***Total deferred tax expense***

Rekonsiliasi antara laba sebelum pajak penghasilan menurut laporan laba rugi dan penghasilan komprehensif lain dengan taksiran rugi kena pajak adalah sebagai berikut:

The reconciliation between profit before income tax as shown in the statement of profit or loss and other comprehensive income with estimated taxable loss are as follows:

	31 Desember/*December 31*,		
	2024	**2023**	
Laba sebelum pajak penghasilan	148.660.124	129.536.228	*Profit before income tax*
Beda waktu:			***Timing differences:***
Imbalan pasca kerja	3.385.166	3.035.528	*Post-employment benefits*
Cadangan bonus, jasa profesional dan promosi	(2.674.515)	(28.443.185)	*Accrue bonuses, professional fees and promotion expenses*
Beban penyisihan kerugian penurunan nilai aset keuangan dan non-keuangan	(434.280.087)	(64.356.877)	*Provision for impairment losses on financial and non-financial assets*
Kerugian yang belum direalisasi Dari penyertaan saham yang diukur Pada nilai wajar melalui laba rugi	-	(137.029.607)	*Unrealised loss - on investment shares measured at fair value through profit or loss*
Jumlah beda waktu	**(433.569.436)**	**(226.794.141)**	***Total timing differences***

22. PERPAJAKAN (lanjutan) / *22. TAXATION (continued)*

b. Beban Pajak Penghasilan (lanjutan) / *b. Deferred Tax Expense (continued)*

	31 Desember/*December 31*,		
	2024	**2023**	
Beda tetap:			***Permanent differences:***
Biaya Pajak	1.009.981	5.208.828	*Tax expenses*
Biaya pemasaran	8.209.700	5.875.975	*Marketing expenses*
Tunjangan karyawan	2.487.845	2.332.300	*Employee's allowances*
Sumbangan	33.600	77.050	*Donation*
Pendapatan dari reksadana yang dikenakan pajak final	(22.373.592)	(10.976.160)	*Income from mutual funds subject to final tax*
(Pendapatan) beban operasional lainnya	1.976.372	(6.950.040)	*Other operating (income) expenses*
Jumlah beda tetap	**(8.656.094)**	**(4.432.047)**	***Total permanent differences***
Taksiran rugi kena pajak	(293.565.406)	(101.689.960)	*Estimated taxable loss*
Kompensasi rugi fiskal tahun-tahun sebelumnya :			*Tax losses carried forward from prior year :*
Rugi fiskal tahun sebelumnya yang masih dapat dikompensasi	(101.689.960)	-	*Tax losses from prior years that can be compensated*
Akumulasi rugi fiskal yang dapat dikompensasi	**(395.255.366)**	**(101.689.960)**	***Accumulated tax losses carried forward***

Rincian rugi fiskal adalah sebagai berikut: / *The details of fiscal losses are as follows:*

	31 Desember/*December 31*,		
	2024	**2023**	
Tahun 2024	(293.565.406)	-	*Year 2024*
Tahun 2023	(101.689.960)	(101.689.960)	*Year 2023*
Total akumulasi rugi fiskal yang dapat dikompensasi	(395.255.366)	(101.689.960)	*Total accumulated tax losses carried forward*
Rugi fiskal yang dikompensasi	-	-	*Compensated tax losses*
Sisa akumulasi rugi fiskal	**(395.255.366)**	**(101.689.960)**	***Remaining accumulated tax losses***

Rugi kena pajak hasil rekonsiliasi merupakan dasar dalam pengisian Surat Pemberitahuan Tahunan (SPT) PPh Badan Bank.

Taxable loss results from reconciliation are the basis in preparing the Bank's Annual Tax Return (SPT) of Corporate Income Tax.

22. PERPAJAKAN (lanjutan) / *22. TAXATION (continued)*

b. Beban Pajak Penghasilan (lanjutan) / *b. Deferred Tax Expense (continued)*

Rekonsiliasi antara beban pajak penghasilan dengan menggunakan tarif pajak yang berlaku dari laba sebelum pajak penghasilan dan beban pajak penghasilan seperti yang disajikan dalam laporan laba rugi dan penghasilan komprehensif lain untuk periode yang berakhir pada tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut:

The reconciliation between the tax expenses computed by applying the applicable tax rate on the profit before income tax and the income tax expenses shown in the statement of profit or loss and other comprehensive income for the period ended December 31, 2024 and 2023, are as follows:

	31 Desember/*December 31*,		
	2024	**2023**	
Laba sebelum pajak penghasilan	148.660.124	129.536.228	*Profit before income tax*
Pajak dihitung dengan tarif pajak yang berlaku	32.705.227	28.497.970	*Tax calculated at applicable tax rates*
Dampak pajak penghasilan pada:			*Tax effects of:*
- Beban yang tidak dapat dikurangkan untuk tujuan pajak	(1.904.341)	(975.050)	*Expenses not deductible - for tax purposes*
Dampak rugi fiskal			*Tax losses*
Penyesuaian atas aset pajak tangguhan	-	196.967	*Adjustment for deffered tax*
Beban pajak penghasilan - bersih	**30.800.886**	**27.719.887**	***Income tax expenses - net***

Rugi kena pajak hasil rekonsiliasi tahun 2024 dan 2023 menjadi dasar dalam pengisian SPT Tahunan PPh Badan Bank yang disampaikan kepada Otoritas Perpajakan.

Taxable loss results from reconciliation in 2024 and 2023 used as basis for preparation of the Bank's Annual Tax Return (SPT) submitted to Tax Authority.

Pada tanggal 29 Oktober 2021, berdasarkan Undang-Undang No. 7 tahun 2021 tentang harmonisasi peraturan perpajakan, antara lain mengatur bahwa tarif pajak yang dikenakan atas penghasilan kena pajak bagi wajib pajak Badan dalam negeri dan bentuk usaha tetap adalah sebesar 22% yang berlaku pada tahun pajak 2022 dan seterusnya.

On October 29, 2021, based on law No. 7 year 2021 harmonization of taxation regulation, among others regulates that income tax rate on corporate taxpayer and permanent establishment's corporate taxable income 22% which will be effective for fiscal year 2022 onwards.

Tarif pajak baru tersebut digunakan sebagai acuan untuk pengukuran aset dan liabilitas pajak kini dan tangguhan sejak berlakunya peraturan tersebut yaitu 29 Oktober 2021.

The new tax rates are used as references to measure the current and deferred tax assets and liabilities starting from the enactment date of the new regulation on October 29, 2021.

c. Pajak tangguhan / *c. Deferred tax*

	31 Desember/ *December 31,* 2024				
	1 Januari/ *January*	**(Dibebankan)/ dikreditkan ke laporan laba rugi/ *(Charged)/ Credited to profit or loss***	**(Dibebankan)/ dikreditkan ke pendapatan komprehensif lain / *(Charged)/ Credited to other comprehensive income***	**31 Desember/ *December***	
Cadangan bonus, jasa profesional dan promosi	2.242.530	3.085.711	2.371.738	7.699.979	*Accrued bonuses, professional fee and promotion*
Cadangan kerugian penurunan nilai	124.010.818	(99.215.723)	-	24.795.095	*Allowance for impairment lossess*
Imbalan pasca kerja	9.631.219	744.737	-	10.375.956	*Post-employment benefits*
Keuntungan/(kerugian) yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada FVOCI	4.747.568	-	2.445.900	7.193.468	*Unrealised gains/ (losses) on changes in fair value of securities measured at FVOCI*
Rugi pajak yang bisa dikompensasi	22.371.791	64.584.389	-	86.956.180	*Tax loss carry forward*
Jumlah aset pajak tangguhan - bersih	**163.003.926**	**(30.800.886)**	**4.817.638**	**137.020.678**	***Total deferred tax assets - net***

22. PERPAJAKAN (lanjutan) / *22. TAXATION (continued)*

c. Pajak tangguhan (lanjutan) / *c. Deferred tax (continued)*

	31 Desember/ *December 31,* 2023				
	1 Januari/ *January*	(Dibebankan)/ dikreditkan ke laporan laba rugi/ *(Charged)/ Credited to profit or loss*	(Dibebankan)/ dikreditkan ke pendapatan komprehensif lain / *(Charged)/ Credited to other comprehensive income*	31 Desember/ *December*	
Cadangan bonus, jasa profesional dan promosi	2.669.950	319.400	(746.820)	2.242.530	*Accrued bonuses, professional fee and promotion*
Cadangan kerugian penurunan nilai	144.943.198	(20.932.380)	-	124.010.818	*Allowance for impairment lossess*
Imbalan pasca kerja	8.963.403	667.816	-	9.631.219	*Post-employment benefits*
Kerugian yang belum direalisasi atas perubahan nilai wajar penyertaan saham	30.146.514	(30.146.514)	-	-	*Unrealised losses on changes in fair value on investment in shares measures at FVTPL*
Keuntungan/(kerugian) yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada FVOCI	10.884.268	-	(6.136.700)	4.747.568	*Unrealised gains/ (losses) on changes in fair value of securities measured at FVOCI*
Rugi pajak yang bisa dikompensasi	-	22.371.791	-	22.371.791	*Tax loss carry forward*
Jumlah aset pajak tangguhan - bersih	**197.607.333**	**(27.719.887)**	**(6.883.520)**	**163.003.926**	***Total deferred tax assets - net***

Manajemen berpendapat bahwa aset pajak tangguhan yang timbul dari perbedaan temporer kemungkinan besar dapat direalisasi pada tahun-tahun mendatang.

Management believes that total deferred tax assets arising from temporary differences are probable to be realised in the future years.

d. Peraturan Menteri Keuangan / *d. Minister of Finance Regulation*

Menteri Keuangan Republik Indonesia menerbitkan Peraturan Menteri Keuangan (PMK) No. 74 pada tanggal 10 Oktober 2024. Berdasarkan peraturan tersebut, Bank harus menghitung cadangan piutang tak tertagih sesuai dengan batasan tertentu yang diatur di dalam PMK 74 mulai tanggal 1 Januari 2024. Pada tanggal 1 Januari 2024, terdapat selisih lebih nilai cadangan per fiskal sebesar Rp254.929.944. Sesuai dengan ketentuan di dalam PMK 74, Bank memutuskan untuk membebankan selisih lebih tersebut di dalam perhitungan pajak penghasilan tahun 2024.

The Minister of Finance of the Republic of Indonesia issued Minister of Finance Regulation (PMK) No. 74 on October 10, 2024. Based on this regulation, the Bank must calculate reserves for bad debts in accordance with certain limits regulated in PMK 74 starting January 1, 2024. On January 1, 2024, there is an excess value of reserves per fiscal amounting to Rp Rp254,929,944. In accordance with the provisions in PMK 74, the Bank decided to charge the excess difference in the 2024 income tax calculation.

22. PERPAJAKAN (lanjutan)

e. Pemeriksaan Pajak

Pemeriksaan tahun pajak 2019

Pada 27 Juni 2022 Kantor Pelayanan Pajak ("KPP") menerbitkan surat pemberitahuan pemeriksaan pajak untuk tahun fiskal 2019. Pada tanggal 4 Maret 2024, KPP menerbitkan Surat Ketetapan Pajak sebagai berikut:

1) Surat Ketetapan Pajak Kurang Bayar No. 00001/206/19/054/24 untuk pajak penghasilan badan tahun fiskal 2019 sebesar Rp3.450.623
2) Surat Ketetapan Pajak Kurang Bayar No. 00002/201/19/054/24 untuk pajak penghasilan pasal 21 sebesar Rp353.807
3) Surat Ketetapan Pajak Kurang Bayar No. 00002/203/19/054/24 untuk pajak penghasilan pasal 23 sebesar Rp892.274
4) Surat Ketetapan Pajak Kurang Bayar No. 00001/240/19/054/24 untuk pajak penghasilan final pasal 4(2) sebesar Rp352.832
5) Surat Ketetapan Pajak Kurang Bayar No. 00001/207/19/054/24 untuk pajak pertambahan nilai sebesar Rp148.925
6) Surat Tagihan Pajak No. 00003/107/19/054/24 untuk PPN tahun fiskal 2019 sebesar Rp10.365

Pihak Bank menerima atas hasil pemeriksaan tersebut yang tertuang pada Surat Ketetapan Pajak tersebut di atas dan telah membayar kekurangan pajak tersebut pada bulan Maret 2024.

f. Administrasi

Berdasarkan Undang-undang Perpajakan yang berlaku di Indonesia, Bank melaporkan dan menyetorkan pajak berdasarkan prinsip self-assessment. Direktorat Jenderal Pajak dapat menetapkan dan mengubah liabilitas pajak dalam batas waktu lima tahun sejak tanggal terutangnya pajak.

22. TAXATION (continued)

e. Tax Assessments

Assessment for fiscal year 2019

On June 27, 2022 Tax Office ("KPP") issued tax assessment notification letter for the fiscal year 2019.On March 4, 2024, KPP issued the following Tax Assessment Letter:

1) Tax Underpayment Assessment Letter No. 00001/206/19/054/24 for corporate income tax for fiscal year 2019 amounting to Rp3,450,623
2) Tax Underpayment Assessment Letter No. 00002/201/19/054/24 for the income tax article 21 amounting to Rp353,807
3) Tax Underpayment Assessment Letter No. 00002/203/19/054/24 for the income tax article 23 amounting to Rp892,274
4) Tax Underpayment Assessment Letter No. 00001/240/19/054/24 for the final income tax article 4(2) amounting to Rp352,832
5) Tax Underpayment Assessment Letter No. 00001/207/19/054/24 for the value added tax amounting to Rp148,925
6) Tax Collection Notice No. 00003/107/19/054/24 for VAT for fiscal year 2019 amounting to Rp10,365

The Bank accepts the assessments results as stated in the above-mentioned Tax Assessment Letter and paid the assessed taxes in March 2024.

f. Administration

Under the prevailing Taxation Laws of Indonesia, the Bank submits and pays taxes on the basis of self-assessment. The Directorate General of Tax may assess or amend taxes liabilities within five years from the date the tax becomes due.

23. AKRUAL DAN LIABILITAS LAIN-LAIN / *23. ACCRUALS AND OTHER LIABILITIES*

	31 Desember/*December 31*,		
	2024	**2023**	
Bunga yang masih harus dibayar	103.156.225	74.152.843	*Interest payable*
Liabilitas sewa (Catatan 14)	39.811.304	47.309.526	*Lease liabilities (Note 14)*
Kewajiban Transaksi ATM, *Internet Banking* dan *Mobile Banking*	16.430.693	14.463.254	*ATM Transaction, Internet Banking and Mobile Banking liabilities*
Cadangan THR dan bonus	15.984.285	13.104.974	*THR and bonus reserves*
Hutang kepada supplier	11.522.906	10.521.933	*Payable to third parties*
Beban akrual	10.596.342	19.003.791	*Accrued expenses*
Kewajiban derivatif	4.007.100	74.058	*Derivatives liabilities*
Cadangan kerugian Bank Garansi	1.270.842	547.808	*Allowance for impairment losses Bank Guarantee*
Cadangan personalia dan biaya pendidikan karyawan	1.190.001	571.267	*Personnel reserve and employee education expenses*
Pendapatan diterima di muka	316.845	362.721	*Unearned revenues*
Lainnya	10.765.604	13.345.363	*Others*
Jumlah	**215.052.147**	**193.457.538**	***Total***

Beban akrual lainnya meliputi biaya administrasi dan operasional.

Accrued expenses consist of administration and operational expenses.

Saldo lain-lain pada tanggal 31 Desember 2024 dan 2023 terutama terdiri dari hutang kepada pihak ketiga.

The balance of others as of December 31, 2024 and 2023 mainly consist of liabilities to third parties.

Seluruh akrual dan liabilitas lain-lain pada tanggal 31 Desember 2024 dan 2023 adalah transaksi dengan pihak ketiga.

All accruals and other liabilities as of December 31, 2024 and 2023 are transactions with third parties.

24. LIABILITAS IMBALAN KERJA KARYAWAN / *24. EMPLOYEE BENEFITS OBLIGATION*

Liabilitas imbalan kerja yang diakui di laporan posisi keuangan adalah sebagai berikut:

Employee benefit liabilities recognised in the statement of financial position are as follows:

	31 Desember/*December 31*,		
	2024	**2023**	
Liabilitas imbalan pasca kerja	54.003.307	39.837.511	*Post-employment benefits liability*

Imbalan kerja jangka panjang / *Long term employee benefit*

Informasi di bawah ini mengikhtisarkan komponen beban imbalan pasca kerja karyawan yang diakui di laporan laba rugi dan penghasilan komprehensif lain dan liabilitas imbalan pasca kerja karyawan yang diakui di laporan posisi keuangan pada tanggal 31 Desember 2024 dan 2023 berdasarkan perhitungan yang dilakukan oleh aktuaris independen Kantor Konsultan Aktuaria Indra Catarya Situmeang & Rekan dan Tubagus Syafrial & Amran Nangasan, menggunakan metode "*Projected Unit Credit*".

The following informations summarise the components of post-employment benefits expense recognised in the profit or loss and other comprehensive income and post-employment benefits liability recognised in the statement of financial position on December 31, 2024 and 2023 based on the independent actuary Kantor Konsultan Aktuaria Indra Catarya Situmeang & Rekan and Tubagus Syafrial & Amran Nangasan, applied the "Projected Unit Credit" method.

24. LIABILITAS IMBALAN KERJA KARYAWAN (lanjutan) / *EMPLOYEE BENEFITS OBLIGATION (continued)*

Imbalan kerja jangka panjang (lanjutan) / ***Long term employee benefit (continued)***

a. Beban imbalan pasca kerja / ***a. Post-employment benefits expenses***

	31 Desember/*December 31*,		
	2024	**2023**	
Biaya jasa kini	7.099.064	5.293.469	*Current service cost*
Biaya bunga	3.084.883	2.894.157	*Interest cost*
Jumlah	**10.183.947**	**8.187.626**	***Total***

b. Liabilitas imbalan pasca kerja / ***b. Post-employment benefits liability***

	31 Desember/*December 31*,		
	2024	**2023**	
Nilai kini kewajiban imbalan pasti	54.003.307	39.837.511	*Present value of defined benefit obligations*

Mutasi nilai kini kewajiban adalah sebagai berikut: / *The movement in the present value of obligation are as follow:*

	31 Desember/*December 31*,		
	2024	**2023**	
Pada awal tahun	**39.837.511**	**40.196.622**	***At the beginning of the year***
Biaya jasa kini	7.099.064	5.293.469	*Current service cost*
Imbalan yang dibayar	(6.798.780)	(5.152.098)	*Benefits paid*
Beban bunga	3.084.883	2.894.157	*Interest cost*
Kerugian/(keuntungan) aktuarial	10.780.629	(3.394.639)	*Actuarial loss/(gain)*
Pada akhir tahun	**54.003.307**	**39.837.511**	***At the end of the year***

Asumsi-asumsi utama yang digunakan dalam menghitung liabilitas imbalan pasca kerja pada tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut: / *The principal assumptions used to determine the post-employment benefits liability as of December 31, 2024 and 2023 are as follows:*

	31 Desember/*December 31*,		
	2024	**2023**	
Usia pensiun normal	55 tahun/*years*	55 tahun/*years*	*Normal retirement age*
Tingkat mortalita	TM IV	TM IV	*Mortality rate*
Tingkat cacat	5,00% dari tingkat mortalita/ *of mortality rate*	5,00% dari tingkat mortalita/ *of mortality rate*	*Disability rate*
Tingkat pengunduran diri	5,00% per tahun/ *per annum*	5,00% per tahun/ *per annum*	*Resignation rate*
Tingkat kenaikan gaji	8,14% per tahun/ *per annum*	7,32% per tahun/ *per annum*	*Salary increase rate*
Tingkat suku bunga	7,04% per tahun/ *per annum*	6,76% per tahun/ *per annum*	*Interest rate*

Bank terekspos dengan beberapa risiko melalui program imbalan pasti, dengan risiko paling signifikan pada tingkat diskonto obligasi dan kenaikan gaji. / *The Bank is exposed to a number of risks through its defined benefit pension plan, with the most significant risk on bond's discount rates and salary increase.*

24. LIABILITAS IMBALAN KERJA KARYAWAN (lanjutan)

Imbalan kerja jangka panjang (lanjutan)

b. Liabilitas imbalan pasca kerja (lanjutan)

Tabel di bawah menunjukkan sensitivitas atas kemungkinan perubahan tingkat kenaikan gaji dan tingkat diskonto terhadap kewajiban imbalan pasca kerja Bank (tidak diaudit):

24. EMPLOYEE BENEFITS OBLIGATION (continued)

Long term employee benefit (continued)

b. Post-employment benefits liability (continued)

The following table represent the sensitivity analysis of a reasonably possible change *in salary increase and discount rate of obligation to Bank's post-employment benefit liability (unaudited):*

	31 Desember/*December 31*, 2024		
	Peningkatan/ *Increase by* 100 bps	**Penurunan/ *Decrease by* 100 bps**	
Tingkat diskonto	(3.096.525)	3.456.741	*Discount rates*
Kenaikan gaji	3.387.460	(3.093.862)	*Salary increases*

	31 Desember/*December 31*, 2023		
	Peningkatan/ *Increase by* 100 bps	**Penurunan/ *Decrease by* 100 bps**	
Tingkat diskonto	(2.379.169)	2.666.818	*Discount rates*
Kenaikan gaji	2.627.178	(2.389.227)	*Salary increases*

Analisis sensitivitas di atas didasarkan pada perubahan atas asumsi tunggal dengan asumsi lainnya konstan. Pada praktiknya, kecil kemungkinan hal tersebut terjadi, dan perubahan-perubahan dalam beberapa asumsi mungkin saling berhubungan. Ketika melakukan perhitungan sensitivitas dari kewajiban imbalan pasti ke asumsi aktuarial yang signifikan, metode yang sama (nilai kini dari kewajiban imbalan pasti yang dihitung menggunakan *projected unit credit* pada akhir periode pelaporan) telah diterapkan seperti saat menghitung kewajiban pensiun yang diakui pada laporan posisi keuangan.

The above sensitivity analysis are based on a change in an assumption while holding all other assumption constant. In practice, this is unlikely to occur, and the changes in some of the assumption may be correlated. When calculation the sensitivity of the defined benefit obligation to significant actuarial assumptions, the same method (present value if the defined benefit obligation calculation with the projected unit credit method at the end of the reporting period) has been applied as when calculating the pension liability recognised within the statement of financial position.

24. LIABILITAS IMBALAN KERJA KARYAWAN (lanjutan) / *EMPLOYEE BENEFITS OBLIGATION (continued)*

Imbalan kerja jangka panjang (lanjutan) / ***Long term employee benefit (continued)***

b. Liabilitas imbalan pasca kerja (lanjutan) / ***b. Post-employment benefits liability (continued)***

Harapan umur hidup / *Life expectancy*

Sebagian besar dari kewajiban program menyediakan manfaat seumur hidup, sehingga kenaikan umur hidup akan mengakibatkan kenaikan liabilitas program.

The majority of the plan's obligations are to provide benefits for the life of the member, so increases in life expectancy will result in an increase in plan's liabilities.

Sebagian besar dari kewajiban program menyediakan manfaat seumur hidup, sehingga kenaikan umur hidup akan mengakibatkan kenaikan liabilitas program.

The majority of the plan's obligations are to provide benefits for the life of the member, so increases in life expectancy will result in an increase in plan's liabilities.

Pada 31 Desember 2024 dan 2023, durasi rata-rata tertimbang dari liabilitas imbalan pasti adalah 14,5 dan 16 tahun (tidak diaudit).

In December 31, 2024 and 2023, the weighted average duration of the defined benefit obligation are 14.5 and 16 years (unaudited).

Analisis jatuh tempo yang diharapkan dari manfaat pensiun adalah sebagai berikut (tidak diaudit):

Expected maturity analysis of employee benefits are as follows (unaudited):

	31 Desember/*December 31*,		
	2024	**2023**	
Kurang dari 1 tahun	8.377.630	2.989.627	*Less than 1 year*
2 - 5 tahun	14.730.958	15.166.437	*2 - 5 years*
5 - 10 tahun	18.149.593	9.475.613	*5 - 10 years*
Lebih dari 10 tahun	12.745.126	12.205.834	*Over 10 years*
Jumlah	**54.003.307**	**39.837.511**	***Total***

25. MODAL SAHAM / *SHARE CAPITAL*

Susunan pemegang saham Bank masing-masing pada tanggal 31 Desember 2024 dan 2023 berdasarkan laporan dari Biro Administrasi Efek PT Adimitra Jasa Korpora adalah sebagai berikut:

The Bank's shareholders as of December 31, 2024 and 2023 based on the report of PT Adimitra Jasa Korpora, the Shares Registration Bureau, are as follows:

	31 Desember/*December 31,* 2024			
Pemegang Saham	**Jumlah saham ditempatkan dan disetor penuh/ *Number of shares issued and fully paid***	**Persentase kepemilikan/ *Percentage of ownership***	**Jumlah modal yang disetor/ *Total capital* (Rp)**	***Shareholders***
PT Victoria Investama Tbk	7.010.537.747	44,23	701.053.775	*PT Victoria Investama Tbk*
Suzanna Tanojo	3.066.411.303	19,35	306.641.130	*Suzanna Tanojo*
Masyarakat (masing-masing di bawah 5%)	5.771.583.856	36,42	577.158.386	*Public (individually less than 5%)*
Jumlah	**15.848.532.906**	**100,00**	**1.584.853.291**	***Total***

25. MODAL SAHAM (lanjutan)

Susunan pemegang saham Bank masing-masing pada tanggal 31 Desember 2024 dan 2023 berdasarkan laporan dari Biro Administrasi Efek PT Adimitra Jasa Korpora adalah sebagai berikut: (lanjutan)

25. SHARE CAPITAL (continued)

The Bank's shareholders as of December 31, 2024 and 2023 based on the report of PT Adimitra Jasa Korpora, the Shares Registration Bureau, are as follows: (continued)

	31 Desember/*December 31,* 2023			
Pemegang Saham	**Jumlah saham ditempatkan dan disetor penuh/ *Number of shares issued and fully paid***	**Persentase kepemilikan/ *Percentage of ownership***	**Jumlah modal yang disetor/ *Total capital* (Rp)**	***Shareholders***
PT Victoria Investama Tbk	7.010.537.747	44,24	701.053.775	*PT Victoria Investama Tbk*
Suzanna Tanojo	3.066.411.303	19,35	306.641.130	*Suzanna Tanojo*
PT Nata Patindo	48.823.665	0,31	4.882.367	*PT Nata Patindo*
Masyarakat (masing-masing di bawah 5%)	5.722.463.063	36,10	572.246.306	*Public (individually less than 5%)*
Jumlah	**15.848.235.778**	**100,00**	**1.584.823.578**	***Total***

Mutasi jumlah saham yang ditempatkan dan disetor penuh adalah sebagai berikut:

The movement in the number of shares issued and fully paid are as follows:

	Jumlah Saham/ *Number of Shares*	
Saldo 1 Januari 2024	**15.848.235.778**	***Balance as of January 1, 2024***
Penambahan modal saham dari penerbitan saham tanpa hak memesan	297.128	*Additional of new shares from exercise of private placement*
Saldo 31 Desember 2024	**15.848.532.906**	***Balance as of December 31, 2024***

Berdasarkan hasil Rapat Umum Pemegang Saham Tahunan tanggal 3 Juni 2022 yang telah dituangkan dalam Akta Notaris No. 05 tanggal 3 Juni 2022, pemegang saham menyetujui rencana Penambahan Modal dengan Memberikan Hak Memesan Efek Terlebih Dahulu.

According to the results of the Annual General Meeting of Shareholders on June 3, 2022 which has been stated in Notary Deed No. 05 dated June 3, 2022, the shareholders approved the plan to execute increase Share Issuance with Pre-emptive Rights.

Pada tanggal 31 Agustus 2022, Bank melakukan penerbitan saham atas Penambahan Modal dengan Hak Memesan Efek Terlebih Dahulu sebanyak 2.553.461.919 lembar saham dengan harga pelaksanaan sebesar Rp150 (sembilan lima puluh rupiah) per saham atau seluruhnya sejumlah Rp383.019.288 (tiga ratus delapan puluh tiga miliar sembilan belas juta dua ratus delapan puluh delapan ribu rupiah) yang telah masuk dalam rekening bank pada tanggal 31 Agustus 2022.

On August 31, 2022, the Bank issued shares for Share Issuance with Pre-emptive Rights of 2,553,461,919 shares with an exercise price of Rp150 (one hundred fifty Rupiah) per share or a total of Rp383,019,288 (three hundred eighty three billion nineteen million two hundred and eighty-eight thousand Rupiah) which has been entered into a Bank's account on August 31, 2022.

Peningkatan modal disetor ini telah dituangkan dalam Akta Notaris No. 1 tanggal 2 September 2022 dan telah diterima dan dicatat di dalam Sistem Administrasi Badan Hukum Kementerian Hukum dan HAM berdasarkan surat No. AHU-AH.01.03-0287195 tanggal 3 September 2022.

This increase in paid-in capital has been stated in Notarial Deed No. 1 dated September 2, 2022 and has been reported and accepted by Ministry of Law and Human Rights of the Republic of Indonesia through its letter No. AHU-AH.01.03-0287195 dated September 3, 2022.

25. MODAL SAHAM (lanjutan)

Berdasarkan hasil Rapat Umum Pemegang Saham Luar Biasa tanggal 19 Oktober 2022 yang telah dituangkan dalam Akta Notaris No. 31 tanggal 19 Oktober 2022, pemegang saham menyetujui rencana Penambahan Modal dengan Memberikan Hak Memesan Efek Terlebih Dahulu disertai dengan penerbitan Waran Seri VII (Catatan 26).

Pada tanggal 29 Desember 2022, Bank melakukan penerbitan saham atas Penambahan Modal dengan Hak Memesan Efek Terlebih Dahulu sebanyak 2.807.640.227 lembar saham dengan harga pelaksanaan sebesar Rp150 (seratus lima puluh rupiah) per saham atau seluruhnya sejumlah Rp421.146.034 (empat ratus dua puluh satu miliar seratus empat puluh enam juta tiga puluh empat ribu rupiah) yang telah masuk dalam rekening bank pada tanggal 28 Desember 2022 disertai dengan penerbitan Waran Seri VII sebanyak 2.573.670.117 waran dengan harga pelaksanaan sebesar Rp100 (seratus Rupiah) per waran.

Peningkatan modal disetor ini telah dituangkan dalam Akta Notaris No. 7 tanggal 29 Desember 2022 dan telah diterima dan dicatat di dalam Sistem Administrasi Badan Hukum Kementerian Hukum dan HAM berdasarkan surat No. AHU-AH.01.03.0497387 tanggal 29 Desember 2022. Sehingga jumlah saham yang ditempatkan dan disetor penuh pada 31 Desember 2022 adalah 15.848.234.714 saham.

Pada tahun 2023, Bank menerbitkan 1.064 lembar saham yang berasal dari hasil pelaksanaan Waran Seri VII pada tahun 2023 sehingga jumlah saham yang ditempatkan dan disetor penuh pada 31 Desember 2023 adalah 15.848.235.778 saham.

Pada tahun 2024, Bank menerbitkan 297.128 lembar saham yang berasal dari hasil pelaksanaan Waran Seri VII pada tahun 2024 sehingga jumlah saham yang ditempatkan dan disetor penuh pada 31 Desember 2024 adalah 15.848.532.906 saham (Catatan 1b).

25. SHARE CAPITAL (continued)

Based on the results of the Extraordinary General Meeting of Shareholders on October 19, 2022 which has been stated in Notary Deed No. 31 dated October 19, 2022, the shareholders approved the plan to increase capital by granting pre-emptive rights accompanied by the issuance of Series VII Warrants (Note 26).

On December 29, 2022, the Bank issued shares for Share Issuance with Pre-emptive Rights of 2,807,640,227 shares with an exercise price of Rp150 (one hundred fifty Rupiah) per share or a total of Rp421,146,034 (four hundred twenty one billion one hundred forty-six million thirty-four thousand Rupiah) which was entered into a Bank's account on December 28, 2022 in conjunction with the issuance of Series VII Warrants of 2,573,670,117 warrants with an exercise price of Rp100 (one hundred Rupiah) per warrant.

This increase in paid-in capital has been stated in Notarial Deed No. 7 dated December 29, 2022 and has been reported and accepted by Ministry of Law and Human Rights of the Republic of Indonesia through its letter No. AHU-AH.01.03.0497387 dated December 29, 2022. Therefore, the number of issued and fully paid shares on December 31, 2022 is 15,848,234,714 shares.

In 2023, the Bank issued 1,064 shares originating from the execution of Series VII Warrants in 2023, so the total shares placed and fully paid as of December 31, 2023 were 15,848,235,778 shares.

In 2024, the Bank issued 297,128 shares originating from the execution of Series VII Warrants in 2024, so the total shares placed and fully paid as of December 31, 2024 were 15,848,532,906 shares (Notes 1b).

26. TAMBAHAN MODAL DISETOR DAN SETORAN MODAL DITERIMA DIMUKA

Tambahan modal disetor merupakan selisih antara jumlah yang diterima dari penerbitan saham dengan nilai nominal yang dicatat sebagai setoran modal.

Pada 4 Juni 2022, Sistem Administrasi Badan Hukum Kementerian Hukum dan HAM berdasarkan surat No.AHU-0103473.AH.01.11 Tahun 2022, telah mencatatkan peningkatan modal disetor Bank menjadi Rp4.100.000.000.000,- (empat triliun seratus miliar Rupiah) (nilai penuh) saham masing-masing dengan nilai nominal Rp100 (seratus Rupiah) (nilai penuh). Peningkatan modal disetor ini berdasarkan hasil Rapat Umum Pemegang Saham Tahunan yang telah dituangkan dalam Akta Notaris No. 7 tanggal 3 Juni 2022.

Pada 22 Juni 2022, Bank menerima tambahan dana setoran modal diterima dimuka dari PT Victoria Investama Tbk, PT Bhuwanatala Indah Permai Tbk, PT Victoria Sekuritas Indonesia, PT Victoria Alife Indonesia, dan PT Emperor Finance Indonesia dengan total seluruhnya sebesar Rp254.500.000.000 (nilai penuh) dalam rangka pemenuhan modal inti minimum berdasarkan POJK No. 12/POJK.03/2020 tentang Konsolidasi Bank Umum yang pelaksanaannya dilakukan sesuai dengan ketentuan POJK No. 11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum Bank Umum tanggal 29 Januari 2016.

Pada tanggal 31 Agustus 2022 Bank melakukan penerbitan 2.553.461.919 lembar saham dengan harga pelaksanaan Rp150 (nilai penuh) per lembar saham. Total penerimaan dana dari penerbitan saham tersebut adalah sebesar Rp383.019.288 dimana nilai nominal saham adalah sebesar Rp255.346.192 sehingga atas penerbitan saham tersebut Bank mencatat tambahan modal disetor sebesar Rp127.673.096.

Penerbitan saham ini mencakup konversi dana setoran modal diterima dimuka yang telah diterima dari PT Victoria Investama Tbk, PT Bhuwanatala Indah Permai Tbk, PT Victoria Sekuritas Indonesia, PT Victoria Alife Indonesia dan PT Emperor Finance menjadi saham dengan harga pelaksanaan Rp150 (nilai penuh) per saham dengan total seluruhnya Rp312.450.000 sehingga jumlah saham yang diterbitkan atas konversi setoran modal diterima dimuka adalah sebanyak 2.083.333.332 lembar. Konversi setoran modal diterima dimuka telah mendapatkan persetujuan dari Otoritas Jasa Keuangan melalui surat No. S-69/PB.33/2022 tanggal 4 Juli 2022.

26. ADDITIONAL PAID-IN CAPITAL AND CAPITAL RECEIVED IN ADVANCE

The additional paid-in capital represent the excess of proceeds from issuance of shares with the par value recorded as paid-in capital.

On June 4, 2022, Legal Entity Administration System of the Ministry of Law and Human Rights based on letter No.AHU-0103473.AH.01.11 Year 2022, the Bank's paid-up capital increased to Rp4,100,000,000,000.- (four trillion one hundred billion Rupiah) (full amount) shares each with nominal of Rp100 (one hundred Rupiah) (full amount). This increase of paid-in capital is based on the results of the Annual General Meeting of Shareholders as stated in the Notarial Deed No. 7 on June 3, 2022.

On June 22, 2022, the Bank received fund of capital received in advance from PT Victoria Investama Tbk, PT Bhuwanatala Indah Permai Tbk, PT Victoria Sekuritas Indonesia, PT Victoria Alife Indonesia and PT Emperor Finance Indonesia amounted to Rp254,500,000,000 (full amount) to fulfill the minimum core capital requirement in accordance with POJK No 12/POJK.03/2020 regarding Commercial Bank Consolidation in accordance with POJK No.11/POJK.03/2016 regarding Liability for Fulfillment of Minimum Capital of Commercial Bank dated January 29, 2016.

On August 31, 2022 the Bank issued 2,553,461,919 shares with an exercise price of Rp150 (full amount) per share. The total proceeds received from the issuance of these shares amounted to Rp383,019,288 where the nominal value of the shares was Rp255,346,192 therefore for the issuance of these shares the Bank recorded additional paid-in capital of Rp127,673,096.

The issuance of these shares includes the conversion of capital received in advance from PT Victoria Investama Tbk, PT Bhuwanatala Indah Permai Tbk, PT Victoria Sekuritas Indonesia, PT Victoria Alife Indonesia and PT Emperor Finance into shares with an exercise price of Rp150 (full amount) per share for a total of Rp312,450,000 so that the number of shares issued upon the conversion capital received in advance are 2,083,333,332 shares. The conversion of capital received in advance has been approved by Financial Services Authority through letter No. S-69/PB.33/2022 dated July 4, 2022.

26. TAMBAHAN MODAL DISETOR DAN SETORAN MODAL DITERIMA DIMUKA (lanjutan)

Pada tanggal 14 Oktober 2022, Bank menerima tambahan dana setoran modal diterima dimuka dari Suzanna Tanojo sebesar Rp200.000.000 dalam rangka pemenuhan modal inti minimum berdasarkan pemenuhan modal inti minimum berdasarkan POJKNo. 12/POJK.03/2020 tentang Konsolidasi Bank Umum yang pelaksanaannya dilakukan sesuai dengan ketentuan POJK No.11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum Bank Umum tanggal 29 Januari 2016.

Berdasarkan hasil Rapat Umum Pemegang Saham Tahunan tanggal 19 Oktober 2022 yang telah dituang dalam Akta Notaris No. 32 tanggal 19 Oktober 2022 pemegang saham menyetujui keputusan berikut:

1. Menyetujui Penambahan modal dengan Hak Memesan Efek Terlebih Dahulu (PMHMETD) sebanyak-banyaknya 4.955.425.905 saham dengan nilai nominal Rp100 per saham, yang disertai dengan penerbitan sebanyak-banyaknya 4.542.473.746 Waran Seri VII.
2. Menyetujui pemberian kuasa dan wewenang kepada Direksi Bank untuk:
   - Menetapkan jumlah saham yang ditawarkan dalam PMHMETD serta jumlah Waran Seri VII;
   - Menetapkan harga pelaksanaan PMHMETD dan harga pelaksanaan Waran Seri VII;
   - Melakukan segala tindakan yang diperlukan dalam pelaksanaan PMHMETD dan penerbitan Waran Seri VII dengan memperhatikan peraturan perundang-undangan yang berlaku; dan
   - Melakukan peningkatan modal ditempatkan dan modal disetor setelah pelaksanaan PMHMETD dan Waran Seri VII dan mengubah Pasal 4 ayat 2 dan 3 Anggaran Dasar Bank Victoria.

26. ADDITIONAL PAID-IN CAPITAL AND CAPITAL RECEIVED IN ADVANCE (continued)

On October 14, 2022, the Bank received additional capital received in advance from Suzanna Tanojo in the amount of Rp200,000,000 in order to fulfill the minimum core capital based on meeting the minimum core capital based on POJK No. 12/POJK.03/2020 concerning Consolidation of Commercial Banks, the implementation of which is carried out in accordance with POJK provisions No. 11/POJK.03/2016 concerning Minimum Capital Adequacy Requirements for Commercial Banks dated January 29, 2016.

Based on Extraordinary General Meeting of Shareholders on October 19, 2022 which has been legalised through Notarial Deed No. 32 dated October 19, 2022, the shareholders agreed the following decisions:

1. Approved additional capital with Pre-emptive Rights (PMHMETD) of maximum of 4,955,425,905 shares with nominal value of Rp100 per share along with issuance of for a maximum of 4,542,473,746 Warrant Series VII.
2. Approved to grant power and authority to the Board of Directors of Bank Victoria to:
   - *Determine the number of shares offered in the PMHMETD and the number of Warrant Series VII;*
   - *Determine the exercise price of PMHMETD and exercise price for Warrants Series VII;*
   - *Implementation of PMHMETD and issuance of Series VII Warrants with due observance of the applicable laws and regulations; and*
   - *Increase the issued and paid-up capital after the implementation of the PMHMETD and Series VII Warrants and amending Article 4 paragraphs 2 and 3 of Bank Victoria's Articles of Association.*

26. TAMBAHAN MODAL DISETOR DAN SETORAN MODAL DITERIMA DIMUKA (lanjutan)

Pada tanggal 29 Desember 2022, Bank melakukan penerbitan 2.807.640.227 lembar saham dengan harga pelaksanaan Rp150 (nilai penuh). Total penerimaan dana dari penerbitan saham tersebut adalah sebesar Rp421.146.034 dimana nilai nominal saham adalah sebesar Rp280.764.022 sehingga atas penerbitan saham tersebut Bank mencatat tambahan modal disetor sebesar Rp140.382.012.

Penerbitan saham ini mencakup konversi atas dana setoran modal diterima dimuka yang telah diterima dari PT Victoria Investama Tbk dan Suzanna Tanojo menjadi saham dengan harga pelaksanaan Rp150 (nilai penuh) per saham dengan total seluruhnya Rp420.000.000 sehingga jumlah saham yang diterbitkan atas konversi setoran modal diterima dimuka adalah sebanyak 2.799.999.999 lembar saham. Konversi setoran modal diterima dimuka telah mendapatkan persetujuan dari Otoritas Jasa Keuangan berdasarkan surat persetujuan No. S-120/PB.33/2022 tanggal 25 November 2022.

Mutasi tambahan modal disetor adalah sebagai berikut:

26. ADDITIONAL PAID-IN CAPITAL AND CAPITAL RECEIVED IN ADVANCE (continued)

On December 29, 2022 the Bank issued 2,807,640,227 shares with an exercise price of Rp150 (full amount). The total receipt of funds from the issuance of these shares amounted to Rp421,146,034 where the nominal value of the shares was Rp280,764,022 so that for the issuance of these shares the Bank recorded additional paid-in capital of Rp140,382,012.

The issuance of these shares includes the conversion of capital received in advance from PT Victoria Investama Tbk and Suzanna Tanojo into shares with an exercise price of Rp150 (full amount) per share for a total of Rp420,000,000 therefore the number of shares issued on the conversion of capital received in advance is 2,799,999,999 shares. The conversion of capital received in advance has been approved by Financial Services Authority based on approval letter No. S-120/PB.33/2022 dated November 25, 2022.

The changes in additional paid-in capital are as follows:

	31 Desember/*December 31*,		
	2024	**2023**	
Saldo awal	**668.684.728**	**670.584.856**	***Beginning balance***
Biaya emisi efek	(313.918)	(1.900.128)	*Issuance cost*
Saldo akhir	**668.370.810**	**668.684.728**	***Ending balance***

27. PENGGUNAAN LABA BERSIH

Penggunaan Laba Bersih Tahun 2024

Berdasarkan Berita Acara Rapat Umum Pemegang Saham Tahunan (RUPST) tanggal 14 Juni 2024 yang dinyatakan dalam Akta Notaris Fathiah Helmi, S.H. tanggal yang sama, Bank membukukan laba bersih pada tahun 2023, dan dipergunakan untuk dana cadangan umum dan laba ditahan. Dengan demikian Bank tidak melakukan pembagian dividen untuk para pemegang saham.

Penggunaan Laba Bersih Tahun 2023

Berdasarkan Berita Acara Rapat Umum Pemegang Saham Tahunan (RUPST) tanggal 26 Mei 2023 yang dinyatakan dalam Akta Notaris Fathiah Helmi, S.H. tanggal yang sama, Bank membukukan laba bersih pada tahun 2022, dan dipergunakan untuk dana cadangan umum dan laba ditahan. Dengan demikian Bank tidak melakukan pembagian dividen untuk para pemegang saham.

27. APPROPRIATION OF INCOME

Appropriation of 2024 Net Income

Based on the Minutes of the Annual General Meeting of Shareholders dated June 14, 2024, as stated in the Notarial Deed of Fathiah Helmi, S.H. on the same date, the Bank recorded a net profit in 2023, and this was used for general reserve funds and retained earnings. Thus, the Bank did not distribute dividends to shareholders.

Appropriation of 2023 Net Income

Based on the Minutes of the Annual General Meeting of Shareholders dated May 26, 2023, as stated in the Notarial Deed of Fathiah Helmi, S.H. on the same date, the Bank recorded a net profit in 2022, and this was used for general reserve funds and retained earnings. Thus, the Bank did not distribute dividends to shareholders.

28. CADANGAN UMUM / *28. GENERAL RESERVES*

Pada tanggal 31 Desember 2024 dan 2023, Bank telah membentuk cadangan umum dan wajib sebesar Rp227.200.000 dan Rp202.200.000. Kenaikan sebesar Rp25.000.000 merupakan penambahan cadangan umum yang disepakati melalui Rapat Umum Pemegang Saham Tahunan (RUPST) pada tanggal 26 Mei 2023. Penambahan cadangan umum tertuang dalam akta Berita Acara Rapat Umum Pemegang Saham Tahunan (RUPST) yang dinyatakan dalam Akta Notaris Fatiah Helmi S.H. pada tanggal yang sama.

As of December 31, 2024 and 2023, the Bank had set up mandatory and general reserves amounting to Rp227,200,000 and Rp202,200,000. The increase of Rp25,000,000 is an addition to the general reserve agreed upon at the Annual General Meeting of Shareholders on May 26, 2023. The addition to the general reserve is outlined in the minutes of the Annual General Meeting of Shareholders as stated in the Notarial Deed of Fatiah Helmi S.H. on the same date.

Cadangan umum dan wajib ini dibentuk sehubungan dengan Undang-Undang Republik Indonesia No. 1/1995 yang telah digantikan dengan Undang-Undang No. 40/2007 efektif tanggal 16 Agustus 2007 mengenai Perseroan Terbatas, yang mengharuskan perusahaan-perusahaan untuk membuat penyisihan cadangan umum sebesar sekurang-kurangnya 20% dari jumlah modal yang ditempatkan dan disetor penuh. Undang-Undang tersebut tidak mengatur jangka waktu untuk membentuk cadangan tersebut.

These general and legal reserve were provided in relation with the Law of the Republic of Indonesia No. 1/1995 which has been replaced with the Law No. 40/2007 effective on August 16, 2007 regarding the Limited Liability Company which requires the companies to set up a general reserve amounting to at least 20% of the issued and paid-up share capital. There is no timeline over which this amount should be provided.

29. PENDAPATAN BUNGA / *29. INTEREST INCOME*

	Tahun yang berakhir Pada tanggal 31 Desember/ *Years ended December 31*,		
	2024	**2023**	
Pinjaman yang diberikan	1.664.126.311	1.477.526.055	*Loans*
Efek-efek	384.208.568	333.248.344	*Marketable securities*
Penempatan pada Bank Indonesia dan bank lain	27.932.876	25.616.731	*Placements with Bank Indonesia and other banks*
Jumlah	**2.076.267.755**	**1.836.391.130**	***Total***

Berdasarkan pihak lawan / ***By counterparties***

	31 Desember/*December 31*,		
	2024	**2023**	
Pihak berelasi (Catatan 39)	13.330.213	26.236.406	*Related party (Note 39)*
Pihak ketiga	2.062.937.542	1.810.154.724	*Third party*
Jumlah	**2.076.267.755**	**1.836.391.130**	***Total***

30. BEBAN BUNGA / *30. INTEREST EXPENSES*

	Tahun yang berakhir Pada tanggal 31 Desember/ *Years ended December 31*,		
	2024	**2023**	
Simpanan dana pihak ketiga			*Third party deposits*
Deposito	970.785.454	831.833.370	*Time deposits*
Tabungan	156.618.299	135.286.864	*Savings deposits*
Giro	119.203.381	97.105.785	*Demand deposits*
Negotiable Certificate Deposit	33.718.644	18.551.748	*Negotiable Certificate Deposits*
Simpanan dari bank lain			*Deposits from other banks*
Call money	41.748.265	22.623.590	*Call money*
Efek-efek yang diterbitkan	190.184.028	144.948.333	*Securities issued*
Efek-efek yang dijual dengan janji dibeli kembali	7.533.032	1.929.650	*Securities sold under repurchased agreement*
Amortisasi emisi obligasi	7.876.104	5.382.435	*Amortisation of bonds issuance cost*
Jumlah	**1.527.667.207**	**1.257.661.775**	***Total***

Berdasarkan pihak lawan / ***By counterparties***

	31 Desember/*December 31*,		
	2024	**2023**	
Pihak berelasi (Catatan 39)	41.487.515	33.127.025	*Related party (Note 39)*
Pihak ketiga	1.486.179.692	1.224.534.750	*Third party*
Jumlah	**1.527.667.207**	**1.257.661.775**	***Total***

31. PENDAPATAN OPERASIONAL LAINNYA - LAIN-LAIN - BERSIH / *31. OTHER OPERATING INCOME - OTHERS - NET*

	Tahun yang berakhir Pada tanggal 31 Desember/ *Years ended December 31*,		
	2024	**2023**	
Penerimaan kembali aset yang telah dihapusbukukan	146.937.841	47.297.306	*Recovery of assets previously written-off*
Pendapatan biaya administrasi jasa perbankan	63.827.024	63.414.450	*Receipt of administrative charges for banking services*
Keuntungan transaksi *spot*	36.830.945	35.422.092	*Gain from spot transaction*
Keuntungan transaksi *swap*	34.982.500	11.313.000	*Gain from swap transaction*
Komisi atas *Internet* dan *Mobile Banking*	5.338.227	5.719.435	*Commission on Internet and Mobile Banking*
Pendapatan rekening tidak aktif, denda saldo minimum, dan penggantian buku	4.323.128	8.807.499	*Income from inactive accounts, minimum deposit penalty, saving account replacement*
Denda keterlambatan	4.214.074	8.322.473	*Penalty income*
Pendapatan administrasi operasional lainnya	4.133.325	5.907.880	*Other administrative operational income*
Laba transaksi *forward*	1.174.315	1.559.855	*Forward transaction profits*
Keuntungan yang belum terealisasi transaksi derivatif	795.408	202.833	*Unrealised gain from derivatives transactions*
Pendapatan dari transaksi ATM	543.834	709.523	*Income from ATM transaction*
Pendapatan transaksi *letter of credit*	528.999	282.474	*Income from letter of credit transactions*
Pendapatan transaksi BI-FAST	5.118	3.364	*Income from BI-FAST transactions*
Jumlah	**303.634.738**	**188.962.184**	***Total***

32. BEBAN/(PENDAPATAN) PENYISIHAN KERUGIAN PENURUNAN NILAI ASET KEUANGAN DAN NON-KEUANGAN

32. PROVISION FOR IMPAIRMENT LOSSES EXPENSES/(INCOME) ON FINANCIAL AND NON-FINANCIAL ASSETS

Beban/(pendapatan) penyisihan kerugian penurunan nilai aset keuangan:

Provision for impairment losses expenses/(income) on financial assets are as follows:

	Tahun yang berakhir Pada tanggal 31 Desember/ *Years ended December 31*,		
	2024	**2023**	
Pinjaman yang diberikan	190.930.041	245.414.162	*Loans*
Pendapatan bunga masih akan diterima (Catatan 10)	17.523.019	(3.814.474)	*Interest income receivables (Note 10)*
Aset lain-lain	824.948	206.792	*Other assets*
Bank Garansi	723.035	306.126	*Bank Guarantee*
Efek-efek	(7.958.551)	396.514	*Marketable securities*
Jumlah	**202.042.492**	**242.509.120**	***Total***

Beban penyisihan kerugian penurunan nilai aset non-keuangan:

Provision of for impairment losses of non-financial assets:

	Tahun yang berakhir Pada tanggal 31 Desember/ *Years ended December 31*,		
	2024	**2023**	
Agunan yang diambil alih	(86.739.397)	(54.964.162)	*Foreclosed assets*

33. BEBAN UMUM DAN ADMINISTRASI

33. GENERAL AND ADMINISTRATIVE EXPENSES

	Tahun yang berakhir Pada tanggal 31 Desember/ *Years ended December 31*,		
	2024	**2023**	
Premi penjaminan	43.691.208	41.124.423	*Insurance premium*
Jasa profesional	26.861.944	8.834.519	*Professional fees*
Penyusutan dan amortisasi	24.481.421	21.974.327	*Depreciation and amortization*
Pungutan OJK tahunan	14.992.416	12.691.827	*Annual fee OJK*
Pengembangan teknologi	11.940.259	5.968.971	*Technology development*
Pemeliharaan dan perbaikan	11.836.879	7.521.077	*Repairs and maintenance*
Sewa gedung dan kendaraan	11.780.398	12.237.699	*Building and vehicle rental*
Biaya Internet dan *Mobile Banking*	9.636.295	10.819.246	*Internet and Mobile Banking expenses*
Iklan dan promosi	9.339.624	6.633.047	*Advertising and promotion*
Pendidikan dan pengembangan	6.110.172	4.955.120	*Study and development*
Telepon, telex dan faksimili	5.770.361	5.780.067	*Telephone, telex and faximile*
Asuransi	4.897.338	6.485.461	*Insurance*
Beban bunga atas liabilitas sewa	4.117.817	2.854.679	*Interest expense of lease liabilities*
Biaya jasa pihak ketiga	3.294.180	2.181.896	*Third-party fee*
Amortisasi aset tak berwujud	2.986.566	1.627.621	*Amortisation of intangible assets*
Barang cetakan dan alat tulis	2.724.187	1.970.579	*Printing items and stationery*
Pemakaian listrik, gas dan air minum	2.335.306	2.266.453	*Electricity, gases and waters*
Biaya umum lainnya	2.117.294	326.578	*Other general expenses*
Transportasi	1.839.235	1.174.517	*Transportation*
Biaya tanggung jawab sosial perusahaan	1.208.652	179.611	*Corporate social responsibility expense*
Biaya iuran lainnya	1.127.247	1.005.878	*Other contribution fees*
Biaya kurir	160.489	84.565	*Courier expenses*
Pemasaran	71.102	141.150	*Marketing*
Surat kabar dan majalah	43.154	44.294	*Newspaper and magazines*
Benda pos dan materai	19.315	16.241	*Postage and stamp*
Jumlah	**203.382.859**	**158.899.846**	***Total***

33. BEBAN UMUM DAN ADMINISTRASI (lanjutan)

Biaya umum lainnya terutama terdiri dari biaya keamanan dan kebersihan, biaya fotokopi, biaya alat kebersihan, biaya makelar dan administrasi bank yang secara individual nilainya tidak signifikan.

33. GENERAL AND ADMINISTRATIVE EXPENSES (continued)

Other general expenses mainly consist of security and cleaning expenses, cleaning equipment expenses, broker, and bank charges with insignificant individual balances.

34. BEBAN TENAGA KERJA / *34. PERSONNEL EXPENSES*

	Tahun yang berakhir Pada tanggal 31 Desember/ *Years ended December 31*,		
	2024	**2023**	
Gaji dan tunjangan	128.235.988	116.870.901	*Salaries and allowance*
Tunjangan Hari Raya dan bonus	20.282.112	16.022.794	*Holiday entitlements and bonuses*
Biaya jasa tenaga kerja	10.860.684	10.130.122	*Outsourcing service expenses*
Imbalan pasca kerja	10.183.947	8.187.626	*Post-employment benefits*
Biaya jaminan kesehatan dan pensiun	3.931.446	3.174.692	*Health and pension insurance*
Pesangon dan biaya apresiasi lainnya	1.551.547	2.219.540	*Severance pay and other appreciation expense*
Lembur	573.351	549.835	*Overtime*
Jumlah	**175.619.075**	**157.155.510**	***Total***

Termasuk dalam beban tenaga kerja adalah kompensasi yang diberikan kepada manajemen dan karyawan kunci (Catatan 39).

Included in the personnel expenses are compensation to key management and employees (Note 39).

35. BEBAN OPERASIONAL LAINNYA - LAIN-LAIN / *35. OTHER OPERATING EXPENSES - OTHERS*

	Tahun yang berakhir Pada tanggal 31 Desember/ *Years ended December 31*,		
	2024	**2023**	
Rugi transaksi valuta asing	69.013.125	53.724.747	*Loss on foreign exchange transaction*
Rugi atas modifikasi pinjaman yang diberikan	28.507.017	48.938.923	*Loss on loan modification*
Beban administrasi dan kliring	6.005.678	7.182.754	*Administration and clearing expenses*
Kerugian belum direalisasi atas transaksi derivatif	4.007.100	74.058	*Unrealised loss from derivatives transactions*
Beban *membership* ATM dan iuran tahunan ATM	3.777.828	4.147.620	*ATM membership and annual fee ATM expenses*
Biaya penghapus-bukuan tagihan asuransi kredit	2.372.473	2.547.631	*Loan insurance receivables write-off expenses*
Biaya provisi dan komisi dana	1.714.315	1.280.393	*Provision and commission funds*
Beban pajak	1.555.767	6.486.145	*Tax expenses*
Beban parkir dan tol	1.081.773	1.096.489	*Parking and toll expenses*
Beban pemasaran	608.113	324.360	*Marketing expenses*
Beban representasi dan jamuan	403.297	246.227	*Representation and entertainment expenses*
Beban keperluan kantor	152.600	138.104	*Office supplies expenses*
Beban sumbangan	33.600	77.050	*Donation expenses*
Biaya operasional lainnya	327.491	212.049	*Other operational expenses*
Jumlah	**119.560.177**	**126.476.550**	***Total***

36. BEBAN (PENDAPATAN) NON-OPERASIONAL - BERSIH / *NON-OPERATING EXPENSES (INCOME) - NET*

	Tahun yang berakhir Pada tanggal 31 Desember/ *Years ended December 31*,		
	2024	**2023**	
Pendapatan non-operasional:			*Non-operating income:*
Hasil sewa	(179.280)	(156.735)	*Rent income*
Pendapatan lainnya	(4.479.589)	(11.863.284)	*Others*
Beban non-operasional:			*Non-operating expense:*
Rugi penjualan AYDA	132.435.515	49.920.048	*Loss on sale of foreclosed assets*
Penurunan nilai aset tetap (Catatan 14)	10.176.913	1.450.000	*Impairment of fixed assets (Note 14)*
Rugi penjualan aset tetap (Catatan 14)	1.600.153	3.636.801	*Loss on sale of fixed assets (Note 14)*
Rugi/(laba) revaluasi valuta asing	935.554	(8.225.193)	*Loss/(gain) on foreign exhange revaluation*
Rugi penjualan properti terbengkalai	-	2.318.310	*Loss on sale of abandoned property*
Beban non-operasional lainnya	3.820.658	7.454.960	*Other non-operational expenses*
Beban non-operasional - bersih	**144.309.924**	**44.534.907**	***Non-operating expenses - net***

Pendapatan lainnya terutama terdiri dari diskon pembelian kupon belanja, dan selisih lebih *cash count*.

Other income mainly consist of discount on voucher purchase, and difference in cash count.

Beban non operasional lainnya terutama terdiri dari biaya hadiah hari raya, denda-denda, sumbangan dan sanksi yang secara individual nilainya tidak signifikan.

Other non-operational expenses mainly consist of holiday gift, fines, donation, and penalty with insignificant individual balances.

37. LABA PER SAHAM / *INCOME PER SHARE*

Laba per saham dasar dihitung dengan membagi laba tahun berjalan yang dapat diatribusikan kepada pemilik Bank dengan jumlah rata-rata tertimbang saham biasa yang beredar pada tahun bersangkutan.

Basic income per share is calculated by dividing the income for the year attributable to the Bank's shareholders with the weighted-average number of ordinary shares outstanding during the year.

Laba per saham dilusian dihitung dengan membagi laba bersih dengan rata-rata tertimbang jumlah saham yang beredar ditambah dengan rata-rata tertimbang jumlah saham yang akan diterbitkan atas konversi efek yang berpotensi saham yang bersifat dilutif.

Diluted income per share is calculated by dividing net income by the weighted average number of shares outstanding plus the weighted average number of shares outstanding which would be issued on the conversion of the dilutive potential shares.

37. LABA PER SAHAM (lanjutan) / *37. INCOME PER SHARE (continued)*

	Tahun yang berakhir Pada tanggal 31 Desember/ *Years ended December 31*,		
	2024	**2023**	
Laba tahun berjalan yang dapat diatribusikan kepada pemilik Entitas Induk untuk perhitungan laba per saham dasar dan dilusian	117.859.238	101.816.341	*Income for the year attributable to equity holders of the Parent Company to be accounted for basic and diluted earnings per share*
Jumlah rata-rata tertimbang saham biasa untuk perhitungan laba per saham dasar	15.848.529	15.848.235	*Weighted-average common stock for computation of basic earnings per share*
Jumlah waran yang beredar untuk perhitungan laba per saham	2.573.372	2.573.669	*Outstanding warrants for computation of basic earnings per share*
Jumlah rata-rata tertimbang saham biasa untuk perhitungan laba per saham dilusian	15.848.529	15.848.235	*Weighted-average common stock for computation of diluted earnings per share*
Laba per saham dasar (dalam Rupiah penuh)	7,44	6,42	*Basic income per share (in Rupiah full amount)*
Laba per saham dasar dilusian (dalam Rupiah penuh)	7,44	6,42	*Diluted income per share (in Rupiah full amount)*

38. TRANSAKSI NON-KAS / *38. NON-CASH TRANSACTIONS*

Transaksi non-kas dari rekonsiliasi liabilitas yang timbul dari aktivitas pendanaan adalah sebagai berikut:

Non-cash transaction from net debt reconciliation affected from financing activities as it follows:

	31 Desember/*December 31, 2024*				
	Saldo awal/ ***Beginning Balance***	**Arus kas/** ***Cash flow***	**Perubahan non-kas/** ***Non-cash activity***	**Saldo akhir/** ***Ending Balance***	
Efek-efek yang diterbitkan	1.347.639.528	950.000.000	(8.226.879)	2.289.412.649	*Securities Issued*
Liabilitas sewa	47.309.526	(12.635.205)	5.136.983	39.811.304	*Lease liabilities*
Jumlah	**1.394.949.054**	**937.364.795**	**(3.089.896)**	**2.329.223.953**	***Total***

	31 Desember/*December 31, 2023*				
	Saldo awal/ ***Beginning Balance***	**Arus kas/** ***Cash flow***	**Perubahan non-kas/** ***Non-cash activity***	**Saldo akhir/** ***Ending Balance***	
Efek-efek yang diterbitkan	1.051.903.552	300.000.000	(4.264.024)	1.347.639.528	*Securities Issued*
Liabilitas sewa	33.100.288	(10.757.017)	24.966.255	47.309.526	*Lease liabilities*
Jumlah	**1.085.003.840**	**289.242.983**	**20.702.231**	**1.394.949.054**	***Total***

39. INFORMASI MENGENAI PIHAK-PIHAK BERELASI

Sifat Hubungan

Pihak-pihak berelasi adalah perusahaan dan perorangan yang mempunyai keterkaitan kepemilikan atau kepengurusan secara langsung maupun tidak langsung dengan Bank sebagaimana diungkapkan pada Catatan 2af.

39. INFORMATION OF RELATED PARTIES

Nature of Relationship

Related parties are companies and individuals who have ownership or management relationship directly or indirectly with the Bank as stated in Note 2af.

Pihak berelasi/ ***Related parties***	**Sifat dari hubungan/** ***Nature of relationship***	**Sifat dari transaksi/** ***Nature of transaction***
PT Victoria Investama Tbk	Pemegang saham/*Shareholder*	Simpanan nasabah, pinjaman yang diberikan/*Deposits from customers, loans*
PT Bank Victoria Syariah	Entitas asosiasi/*Associate entity*	Simpanan dari bank lain/*Deposits from other banks*
PT Victoria Sekuritas Indonesia	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Victoria Insurance	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah,pinjaman yang Diberikan, asuransi aset tetap dan asuransi kas/ *Deposits from customers, loans, fixed assets insurance and cash insurance*
PT Victoria Alife	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Victoria Manajemen Investasi	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Merak Energi Indonesia	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah, pinjaman yang diberikan/*Deposits from customers, loans*
PT Tridaya Investindo (d/h PT BIP Tridaya Propertindo)	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah, pinjaman yang diberikan/*Deposits from customers, loans*
PT Grha Swahita	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah, pinjaman yang diberikan/*Deposits from customers, loans*
PT Padi Unggul Indonesia	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/ *Deposit from customers*
PT BIP Loka Kencana	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT BIP Sentosa	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Studio One	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Asri Kencana Gemilang	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Artoda Karya Gemilang	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*

39. INFORMASI MENGENAI PIHAK-PIHAK BERELASI (lanjutan)

39. INFORMATION OF RELATED PARTIES (continued)

Pihak berelasi/ *Related parties*	Sifat dari hubungan/ *Nature of relationship*	Sifat dari transaksi/ *Nature of transaction*
PT Bhuwanatala Indah Permai	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Frogurt Sari Indonesia	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Emperor Finance Indonesia	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Grata Mulia Pratama	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Putra Asih Laksana	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Suryayudha Investindo Cipta	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT GMT Investama Mandiri Tbk	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Dwimagna Kapital	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Magna Investa Mandiri	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Bintang Jaya Bara Sentosa	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT BIP Boga Entertainment	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT BIP Boga Permai	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Bumi Semesta Lestari	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Prolestari Mega Persada	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Regis Pratama Indonesia	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Surya Cakra Multi Sarana	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Verena Kapital	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Sulfindo Adiusaha	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah, pinjaman yang diberikan/*Deposits from customers, loans*

39. INFORMASI MENGENAI PIHAK-PIHAK BERELASI (lanjutan)

39. INFORMATION OF RELATED PARTIES (continued)

Pihak berelasi/ *Related parties*	Sifat dari hubungan/ *Nature of relationship*	Sifat dari transaksi/ *Nature of transaction*
PT Nata Patindo	Pemegang saham/*Shareholder*	Simpanan nasabah/*Deposits from customers*
Suzanna Tanojo	Pemegang saham pengendali/ *Controlling Shareholder*	Simpanan nasabah/*Deposits from customers*
Luciana Tanoyo	Hubungan keluarga dengan Suzanna Tanojo/*Relative of Suzanna Tanojo*	Simpanan nasabah/*Deposits from customers*
Dewan Komisaris, Direksi dan pejabat eksekutif Bank/*Board of Commissioners, Directors and executive officers of the Bank*	Manajemen dan karyawan kunci/ *Key management and employees*	Simpanan nasabah, pinjaman yang diberikan/*Deposits from customers, loans*
Dewan Komisaris, Direksi dan pejabat Eksekutif Entitas Asosiasi/*Board of Commissioners, Directors and executive officers of Associated Entity*	Manajemen dan karyawan kunci/ *Key management and employees*	Simpanan nasabah, pinjaman yang diberikan/*Deposits from customers, loans*

Transaksi dengan pihak-pihak berelasi

Transactions with related parties

Transaksi-transaksi dengan pihak-pihak berelasi adalah sebagai berikut:

Transactions with related parties are as follows:

	31 Desember/*December 31*,		
	2024	**2023**	
Aset			***Assets***
Pinjaman yang diberikan - bruto (Catatan 11)			*Loans - gross (Note 11)*
PT Sulfindo Adiusaha	78.087.258	91.067.628	*PT Sulfindo Adiusaha*
PT Grha Swahita	23.722.610	20.031.085	*PT Grha Swahita*
PT Merak Energi Indonesia	17.974.599	-	*PT Merak Energi Indonesia*
PT Victoria Investama Tbk	-	24.301.030	*PT Victoria Investama Tbk*
PT Victoria Insurance Indonesia Tbk	-	286.816	*PT Victoria Insurance Indonesia Tbk*
PT Cahaya Medika Health Care	-	21.130	*PT Cahaya Medika Health Care*
PT Jaya Bhakti Mandiri	-	12.568	*PT Jaya Bhakti Mandiri*
Dewan Komisaris, Direksi dan pejabat eksekutif Entitas Asosiasi	1.617.225	5.358.779	*Boards of Commissioners, Directors and executive officers of Associated Entity*
Dewan Komisaris, Direksi dan pejabat eksekutif Bank	2.065.419	2.817.405	*Boards of Commissioners, Directors and executive officers of the Bank*
Jumlah pinjaman yang diberikan - bruto	123.467.111	143.896.441	*Total loans - gross*
Persentase terhadap jumlah aset	**0,40%**	**0,49%**	***Percentage from total assets***

39. INFORMASI MENGENAI PIHAK-PIHAK BERELASI (lanjutan) / *INFORMATION OF RELATED PARTIES (continued)*

Transaksi dengan pihak-pihak berelasi (lanjutan) / ***Transactions with related parties (continued)***

Transaksi-transaksi dengan pihak-pihak berelasi adalah sebagai berikut: (lanjutan) / *Transactions with related parties are as follows: (continued)*

	31 Desember/*December 31*,		
	2024	**2023**	
Liabilitas			***Liabilities***
Simpanan nasabah (Catatan 18)			*Deposits from customers (Note 18)*
Giro	209.682.617	652.841.415	*Demand deposits*
Tabungan	33.955.891	27.996.913	*Savings deposits*
Deposito berjangka	323.392.414	618.884.872	*Time deposits*
Negotiable Certificate Deposit	104.919.517	98.246.827	*Negotiable Certificate Deposits*
Jumlah simpanan nasabah	671.950.439	1.397.970.027	*Total deposits from customers*
Simpanan dari Bank Lain (Catatan 19)			*Deposits from other banks (Note 19)*
Giro	532.305	478.732	*Demand deposits*
Efek-efek yang diterbitkan (Catatan 21)	147.885.000	92.730.000	*Securities issued (Note 21)*
Jumlah	820.367.744	1.491.178.759	*Total*
Persentase terhadap jumlah liabilitas	**3,03%**	**5,42%**	***Percentage from total liabilities***
Pendapatan bunga (Catatan 29)			*Interest income (Note 29)*
PT Sulfindo Adiusaha	7.948.007	5.781.638	*PT Sulfindo Adiusaha*
PT Grha Swahita	3.652.001	17.470.235	*PT Grha Swahita*
PT Merak Energi Indonesia	1.365.636	-	*PT Merak Energi Indonesia*
PT Cahaya Medika Health Care	2.887	1.802	*PT Cahaya Medika Health Care*
PT Victoria Insurance Indonesia Tbk	2.053	19.520	*PT Victoria Insurance Indonesia Tbk*
PT Jaya Bhakti Mandiri	1.730	1.046	*PT Jaya Bhakti Mandiri*
PT Victoria Investama Tbk	-	2.419.518	*PT Victoria Investama Tbk*
PT Victoria Sekuritas Indonesia	-	43.450	*PT Victoria Sekuritas Indonesia*
Dewan Komisaris, Direksi dan pejabat eksekutif Entitas Asosiasi	310.571	284.719	*Boards of Commissioners, Directors and executive officers of Associated Entity*
Dewan Komisaris, Direksi dan pejabat eksekutif Bank	47.328	214.478	*Boards of Commissioners, Directors and executive officers of the Bank*
Jumlah	13.330.213	26.236.406	*Total*
Persentase terhadap jumlah pendapatan bunga	**0,64%**	**1,42%**	***Percentage from total interest income***

39. INFORMASI MENGENAI PIHAK-PIHAK BERELASI (lanjutan) / *39. INFORMATION OF RELATED PARTIES (continued)*

Transaksi dengan pihak-pihak berelasi (lanjutan) / ***Transactions with related parties (continued)***

Transaksi-transaksi dengan pihak-pihak berelasi adalah sebagai berikut: (lanjutan) / *Transactions with related parties are as follows: (continued)*

	31 Desember/*December 31*, 2024	31 Desember/*December 31*, 2023	
Beban bunga (Catatan 30)			*Interest expenses (Note 30)*
Giro	13.215.461	9.156.511	*Demand deposits*
Tabungan	798.248	1.556.192	*Savings deposits*
Deposito berjangka	27.473.806	22.414.322	*Time deposits*
Jumlah	**41.487.515**	**33.127.025**	***Total***
Persentase terhadap jumlah beban bunga	**2,72%**	**2,63%**	***Percentage from total interest expenses***
Beban tenaga kerja (Catatan 34)			***Personnel expenses (Note 34)***
Gaji dan tunjangan Dewan Komisaris	4.973.541	4.955.125	*Salaries and allowances of the Boards of Commissioners*
Gaji dan tunjangan Dewan Direksi	16.706.700	16.956.764	*Salaries and allowances of the Boards of Directors*
Gaji dan tunjangan Pejabat Eksekutif	28.829.719	23.410.812	*Salaries and allowances of the Executive Officers*
Jumlah	**50.509.960**	**45.322.701**	***Total***
Persentase terhadap jumlah beban tenaga kerja	**28,76%**	**28,84%**	***Percentage from total personnel expenses***
Liabilitas komitmen dan kontinjensi (Catatan 40)			***Liabilities commitments and contingencies (Note 40)***
Fasilitas pinjaman yang belum digunakan			*Unused loans facilities*
PT Grha Swahita	(166.240)	(5.730.535)	*PT Grha Swahita*
PT Cahaya Medika Health Care	-	(978.870)	*PT Cahaya Medika Health Care*
PT Jaya Bhakti Mandiri	-	(737.431)	*PT Jaya Bhakti Mandiri*
PT Victoria Investama Tbk	-	(698.970)	*PT Victoria Investama Tbk*
Dewan Komisaris, Direksi dan Pejabat eksekutif Bank	-	(7.000.000)	*Boards of Commissioners, Directors and executive officers of the Bank*
Dewan Komisaris, Direksi dan pejabat eksekutif Entitas Asosiasi	(3.433.804)	(1.891.324)	*Boards of Commissioners, Directors and executive officers of Associated Entity*
Garansi yang diterbitkan - pihak berelasi			*Guarantees issued - related parties*
PT Victoria Alife Indonesia	(271.300)	(271.300)	*PT Victoria Alife Indonesia*
Jumlah	**(3.871.344)**	**(17.308.430)**	***Total***
Persentase terhadap jumlah liabilitas komitmen dan kontinjensi - bersih	**0,08%**	**0,28%**	***Percentage from total commitments and contingencies liabilities - net***

39. INFORMASI MENGENAI PIHAK-PIHAK BERELASI (lanjutan)

Transaksi dengan pihak-pihak berelasi (lanjutan)

Transaksi-transaksi dengan pihak-pihak berelasi adalah sebagai berikut: (lanjutan)

Tabel berikut merupakan kisaran tingkat suku bunga kontraktual per tahun atas transaksi dengan pihak-pihak berelasi untuk tahun yang berakhir pada tanggal 31 Desember 2024 dan 2023 :

39. INFORMATION OF RELATED PARTIES (continued)

Transactions with related parties (continued)

Transactions with related parties are as follows: (continued)

The following table summarises the range of contractual interest rates per annum for transactions with related parties for the years ended December 31, 2024 and 2023:

	Tingkat suku bunga per 31 Desember/ *Interest rate as of December 31*,		
	2024	**2023**	
Aset			***Assets***
Pinjaman yang diberikan - bersih (Catatan 11)	5,25% - 10,50%	5,00% - 13,00%	*Loans - net (Note 11)*
Liabilitas			***Liabilities***
Simpanan nasabah (Catatan 18)			*Deposits from customers (Note 18)*
Giro	0,00% - 6,50%	0,00% - 5,75%	*Demand deposits*
Tabungan	0,00% - 5,00%	0,00% - 5,00%	*Savings deposits*
Deposito berjangka	0,25% - 8,00%	2,25% - 7,00%	*Time deposits*
Negotiable Certificated Deposit	6,50% - 7,00%	6,50% - 7,00%	*Negotiable Certificate of Deposits*
Simpanan dari bank lain (Catatan 19)			*Deposits from other bank (Note 19)*
Giro	0,50% - 1,50%	0,50% - 1,50%	*Demand deposits*
Efek-efek yang diterbitkan (Catatan 21)	10,75% - 11,75%	11,00% - 11,75%	*Securities issued (Note 21)*

Bank memberikan kompensasi kepada Dewan Komisaris, Direksi dan pejabat eksekutif untuk tahun yang berakhir pada tanggal 31 Desember 2024 dan 2023 sebagai berikut:

The Bank provided compensation to Board of Commissioners, Directors and executive officers for the years ended December 31, 2024 and 2023 as follows:

	31 Desember/*December 31*,		
	2024	**2023**	
Dewan Komisaris:			*Board of Commissioners:*
Gaji	3.908.758	3.772.363	*Salaries*
Tunjangan akhir tahun	374.357	321.336	*Year End Allowances*
Tunjangan Hari Raya	352.193	327.191	*Holiday Entitlements*
Bonus	338.233	534.235	*Bonuses*
Direksi:			*Directors:*
Gaji	13.228.393	12.454.018	*Salaries*
Tunjangan akhir tahun	1.128.572	1.011.571	*Year End Allowances*
Tunjangan Hari Raya	1.019.695	991.175	*Holiday Entitlements*
Bonus	1.330.040	2.500.000	*Bonuses*
Pejabat eksekutif:			*Executive officers:*
Gaji	22.766.951	19.159.386	*Salaries*
Tunjangan akhir tahun	1.994.918	1.754.592	*Year End Allowances*
Tunjangan Hari Raya	1.922.027	1.646.336	*Holiday Entitlements*
Bonus	2.145.823	850.498	*Bonuses*
Jumlah	**50.509.960**	**45.322.701**	***Total***

39. INFORMASI MENGENAI PIHAK-PIHAK BERELASI (lanjutan)

Transaksi dengan pihak-pihak berelasi (lanjutan)

Tidak ada kompensasi dalam bentuk imbalan pasca kerja, imbalan kerja jangka panjang lainnya, pesangon pemutusan kontrak kerja dan pembayaran berbasis saham kepada Dewan Komisaris dan Direksi.

39. INFORMATION OF RELATED PARTIES (continued)

Transactions with related parties (continued)

There are no compensation of post-employment benefits, other long-term benefits, termination benefits and share-based payment to the Boards of Commisioners and Directors.

40. KOMITMEN DAN KONTINJENSI / *40. COMMITMENTS AND CONTINGENCIES*

Ikhtisar komitmen dan kontinjensi Bank yang dinyatakan dalam nilai kontrak adalah sebagai berikut:

The following is the summary of the Bank's commitments and contingencies at contractual amounts:

	31 Desember/*December 31*,		
	2024	**2023**	
Komitmen			***Commitments***
Liabilitas komitmen:			*Commitment liabilities:*
Fasilitas pinjaman yang belum digunakan:			*Unused loan facilities:*
Pihak berelasi (Catatan 39)	(3.600.044)	(17.037.130)	*Related parties (Note 39)*
Pihak ketiga	(4.657.963.621)	(5.280.610.008)	*Third parties*
Liabilitas komitmen - bersih	(4.661.563.665)	(5.297.647.138)	*Commitment liabilities - net*
Kontinjensi			***Contingencies***
Tagihan kontinjensi:			*Contingent receivables:*
Pendapatan bunga atas pinjaman bermasalah - pihak ketiga	263.554.741	311.523.645	*Interest receivables on non-performing loans - third parties*
Liabilitas kontinjensi:			*Contingent liabilities:*
Garansi yang diterbitkan:			*Guarantees issued:*
Pihak berelasi (Catatan 39)	(271.300)	(271.300)	*Related parties (Note 39)*
Pihak ketiga	(521.871.689)	(982.531.650)	*Third parties*
Letter of Credit	(169.275.405)	(60.563.964)	*Letter of Credit*
Kontinjensi - bersih	(427.863.653)	(731.843.269)	*Contingencies - net*
Jumlah liabilitas komitmen dan kontinjensi - bersih	**(5.089.427.318)**	**(6.029.490.407)**	***Total commitment and contingencies liabilities - net***

Pada tanggal 31 Desember 2024 dan 2023, tidak terdapat komitmen dan kontinjensi signifikan lainnya selain komitmen dan kontinjensi yang telah diungkapkan di atas.

As of December 31, 2024 and 2023, there are no significant commitments and contingencies other than the aforementioned commitments and contingencies.

41. PERJANJIAN PENTING / *41. SIGNIFICANT AGREEMENT*

Perjanjian Implementasi Sistem Aplikasi Terintegrasi Transaksi Manajemen - PT Sigma Cipta Caraka

Pada tanggal 26 Agustus 2014, Bank dan PT Sigma Cipta Caraka telah menandatangani Perjanjian Aplikasi Terintegrasi Transaksi Manajemen, dimana PT Sigma Cipta Caraka setuju untuk memberikan layanan jasa untuk membuat sistem untuk operasi bisnis Bank.

Implementation of Application Integrated Transaction Management - PT Sigma Cipta Caraka

On August 26, 2014, Bank and PT Sigma Cipta Caraka have signed Application Integrated Transaction Management, in which PT Sigma Cipta Caraka agrees to distribute Integrated Transaction Management Application for Bank's business operation.

41. PERJANJIAN PENTING (lanjutan)

Perjanjian Implementasi Sistem Aplikasi Terintegrasi Transaksi Manajemen - PT Sigma Cipta Caraka (lanjutan)

Berdasarkan perjanjian ini, PT Sigma Cipta Caraka memiliki hak dan kewajiban sebagai berikut:

1. PT Sigma Cipta Caraka berhak mendapatkan pembayaran dari Bank;
2. PT Sigma Cipta Caraka wajib memberikan lisensi aplikasi kepada Bank;
3. PT Sigma Cipta Caraka wajib membuat aplikasi sesuai dengan keinginan Bank;
4. PT Sigma Cipta Caraka wajib membuat laporan kemajuan proses implementasi; dan
5. PT Sigma Cipta Caraka wajib memastikan program telah benar untuk mencegah kesalahan.

Berdasarkan Addendum VI No.461/SCC/BVIC/B/19 tanggal 24 Juli 2019, jangka waktu perjanjian diubah menjadi tanpa jangka waktu hingga salah satu pihak melakukan pengakhiran perjanjian.

Biaya jasa yang telah dibayarkan sampai dengan 31 Desember 2024 dan 2023 adalah sebesar:

41. SIGNIFICANT AGREEMENT (continued)

Implementation of Application Integrated Transaction Management - PT Sigma Cipta Caraka (continued)

Based on this agreement, PT Sigma Cipta Caraka have right and obligation as follows:

1. *PT Sigma Cipta Caraka is entitled to receive payment from the Bank;*
2. *PT Sigma Cipta Caraka is obligated to give the license of the application to the Bank;*
3. *PT Sigma Cipta Caraka is obligated to customize the application according to Bank's request;*
4. *PT Sigma Cipta Caraka is obligated to make official report for implementation process progress; and*
5. *PT Sigma Cipta Caraka is obligated to ensure the programs to prevent errors.*

According to Addendum VI No.461/SCC/BVIC/B/19 dated July 24, 2019, the term of the agreement was changed to no time period until one of the party terminates the agreement.

Service fees paid as of December 31, 2024 and 2023 are amounted:

	31 Desember/*December 31*,	
	2024	**2023**
Rupiah	6.928.248	1.623.875

Rupiah

Perjanjian Implementasi Sistem Aplikasi Terintegrasi Transaksi Manajemen - PT Panen Berkah Solusi

Pada tanggal 21 Juni 2022, Bank dan PT Panen Berkah Solusi telah menandatangani Perjanjian Pemeliharaan Server AS400, dimana PT Panen Berkah Solusi setuju untuk memberikan layanan jasa pemeliharaan server AS400 untuk operasi Bank.

Implementation of Application Integrated Transaction Management - PT Panen Berkah Solusi

On June 21, 2022, the Bank and PT Panen Berkah Solusi has signed an AS400 Server Maintenance Agreement, whereby PT Panen Berkah Solusi agreed to provide AS400 server maintenance services for the Bank's operations.

41. PERJANJIAN PENTING (lanjutan)

Perjanjian Implementasi Sistem Aplikasi Terintegrasi Transaksi Manajemen - PT Panen Berkah Solusi (lanjutan)

Berdasarkan perjanjian ini, PT Panen Berkah Solusi memiliki hak dan kewajiban sebagai berikut:

1. PT Panen Berkah Solusi berhak mendapatkan pembayaran dari Bank;
2. PT Panen Berkah Solusi, wajib menyediakan jasa tenaga kerja sesuai kemampuan teknis;
3. PT Panen Berkah Solusi, wajib memberikan informasi tertulis kepada Bank yang diperlukan dalam penyelesaian tugas;
4. PT Panen Berkah Solusi, wajib mengirimkan suku cadang kepada Bank;
5. PT Panen Berkah Solusi, wajib melakukan kunjungan setiap dua bulan untuk melakukan pengecekan pada semua perangkat;
6. PT Panen Berkah Solusi, berhak melakukan penagihan atas jasa penyediaan suku cadang;
7. PT Panen Berkah Solusi, wajib menyediakan semua kebutuhan suku cadang yang diperlukan dalam rangka perbaikan mesin;
8. PT Panen Berkah Solusi bersedia di audit oleh auditor internal Bank atau Otoritas Jasa Keuangan atau pihak eksternal yang ditunjuk oleh Bank; dan
9. PT Panen Berkah Solusi, wajib melaporkan kepada Bank setiap kejadian kritis yang dapat mengakibatkan kerugian/menganggu kelancaran operasional Bank.

Surat perjanjian tertanggal 21 Juni 2022 pada terhadap perjanjian kerja sama antara Bank dan PT Panen Berkah Solusi pada No.016/SPK/PBS/VI/2022 bahwa jangka waktu perjanjian adalah sejak tanggal 21 Juni 2022 sampai dengan 20 Juni 2023, sebagaimana telah diubah pada Adendum perjanjian No.028/SPK.Add/PBS/VII/2024 tanggal 12 Juli 2024, jangka waktu perjanjian adalah sejak tanggal 20 Juni 2024 sampai dengan 19 Juni 2025.

Biaya jasa yang telah dibayarkan sampai dengan 31 Desember 2024 dan 2023 yang termasuk dalam perjanjian ini adalah sebesar:

41. SIGNIFICANT AGREEMENT (continued)

Implementation of Application Integrated Transaction Management - PT Panen Berkah Solusi (continued)

Based on this agreement, PT Panen Berkah Solusi has the following rights and obligations:

1. *PT Panen Berkah Solusi is entitled to receive payment from the Bank;*
2. *PT Panen Berkah Solusi, is required to provide labor services according to technical capabilities;*
3. *PT Panen Berkah Solusi, is required to provide written information to the Bank that is needed in completing the task;*
4. *PT Panen Berkah Solusi, must send spare parts to the Bank;*
5. *PT Panen Berkah Solusi, must visit every two months to check all devices;*
6. *PT Panen Berkah Solusi, has the right to bill for spare parts supply services;*
7. *PT Panen Berkah Solusi, must provide all the spare parts needed for machine repair;*
8. *PT Panen Berkah Solusi is willing to be audited by the Bank's internal auditor or the Financial Services Authority or an external party appointed by the Bank; and*
9. *PT Panen Berkah Solusi, is required to report to the Bank every critical incident that may result in losses/disturb the smooth operation of the Bank.*

The agreement dated June 21, 2022 on the agreement between the Bank and PT Panen Berkah Solusi under No.016/SPK/PBS/VI/2022 states that the term of the agreement is from June 21, 2022 until June 20, 2023, as amended in the Agreement Addendum No.028/SPK.Add/PBS/VII/2024 dated July 12, 2024, the term of the agreement is from June 20, 2024 until June 19, 2025.

Service fees paid as of December 31, 2024 and 2023 included in this agreement are amounted:

	31 Desember/*December 31*,	
	2024	**2023**
Rupiah	640.494	226.440

Rupiah

41. PERJANJIAN PENTING (lanjutan)

Perjanjian Kerjasama Revamp Mobile Banking, Internet Banking, dan Internet Banking Bisnis - PT Infosys Solusi Terpadu

Pada tanggal 20 Agustus 2021, Bank dan PT Infosys Solusi Terpadu telah menandatangani Perjanjian Kerjasama *Revamp Mobile Banking, Internet Banking*, dan *Internet Banking* Bisnis, dimana PT Infosys Solusi Terpadu setuju untuk memberikan layanan *Revamp Mobile Banking*, *Internet Banking,* dan *Internet Banking* Bisnis untuk operasi Bank.

Berdasarkan perjanjian ini, PT Infosys Solusi Terpadu memiliki hak dan kewajiban sebagai berikut:

1. PT Infosys Solusi Terpadu berhak mendapatkan pembayaran dari Bank;
2. PT Infosys Solusi Terpadu wajib menjamin ketersediaan sumber daya untuk pengembangan aplikasi *Digital Application platform*;
3. PT Infosys Solusi Terpadu wajib memberikan layanan *support* dan *maintenance* selama masa *post implementation* maksimal 1 (satu) bulan setelah *Go-Live*;
4. PT Infosys Solusi Terpadu wajib memberikan garansi aplikasi selama 6 (enam) bulan, setelah *Live Production*;
5. PT Infosys Solusi Terpadu wajib memberikan *support* 7 x 24 jam apabila terjadi permasalahan;
6. PT Infosys Solusi Terpadu wajib menyelesaikan pekerjaan sesuai dengan jangka waktu yang telah ditentukan;
7. PT Infosys Solusi Terpadu wajib memberikan dokumentasi perangkat lunak, termasuk *source code* serta dokumentasi sistem dan petunjuk teknis penggunaan, termasuk didalamnya untuk memberikan instalasi *guide version* di mesin *development*;
8. PT Infosys Terpadu menjamin bahwa perangkat lunak tidak mengandung *back door* yang memungkinkan akses oleh pihak yang tidak berwenang ke dalam sisten dan data Bank;
9. PT Infosys Terpadu wajib mebdapatkan persetujuan tertulis dari Bank, jika melakukan pengalihan sebagaian pekerjaan kepada subkontraktor;
10. PT Infosys Terpadu bersedia diaudit oleh auditor internal Bank, atau Otoritas Jasa Keuangan atau pihak eksternal yang ditunjuk oleh Bank; dan
11. PT Infosys Terpadu wajib melaporkan setiap kejadian kritis yang dapat mengakibatkan kerugian dan/atau mengganggu kelancaran operasional Bank.

41. SIGNIFICANT AGREEMENT (continued)

Agreement of Revamp of Mobile Banking, Internet Banking, and Business Internet Banking - PT Infosys Solusi Terpadu

On August 20, 2021, the Bank and PT Infosys Solusi Terpadu signed a Cooperation Agreement for the Revamp of Mobile Banking, Internet Banking, and Business Internet Banking, whereby PT Infosys Solusi Terpadu agreed to provide revamp services for Mobile Banking, Internet Banking, and Business Internet Banking for the Bank's operations.

Based on this agreement, PT Infosys Solusi Terpadu has the following rights and obligations:

1. *PT Infosys Solusi Terpadu is entitled to receive payment from the Bank;*
2. *PT Infosys Solusi Terpadu is required to ensure the availability of resources for the development of the Digital Application platform;*
3. *PT Infosys Solusi Terpadu is required to provide support and maintenance services during the post-implementation period for a maximum of 1 (one) month after Go-Live;*
4. *PT Infosys Solusi Terpadu is required to provide an application warranty for 6 (six) months after Live Production;*
5. *PT Infosys Solusi Terpadu is required to provide 24/7 support in the event of any issues;*
6. *PT Infosys Solusi Terpadu is required to complete the work within the specified timeframe;*
7. *PT Infosys Solusi Terpadu is required to provide software documentation, including source code, system documentation, and technical usage guidelines, as well as an installation guide version for the development environment;*
8. *PT Infosys Solusi Terpadu guarantees that the software does not contain any backdoor that would allow unauthorised access to the Bank's systems and data;*
9. *PT Infosys Solusi Terpadu is required to obtain written approval from the Bank if it intends to delegate part of the work to a subcontractor;*
10. *PT Infosys Solusi Terpadu agrees to be audited by the Bank's internal auditor, the Financial Services Authority, or an external party appointed by the Bank; and*
11. *PT Infosys Solusi Terpadu is required to report any critical incidents that may result in losses and/or disrupt the Bank's operations.*

41. PERJANJIAN PENTING (lanjutan)

Perjanjian Kerjasama Revamp Mobile Banking, Internet Banking, dan Internet Banking Bisnis - PT Infosys Solusi Terpadu (lanjutan)

Berdasarkan Addendum Pertama No. 004/DIR-VICT/PKS/11/24 tanggal 28 November 2024, terdapat perubahan tentang Persyaratan Teknis dan penambahan ketentuan mengenai Timeline pengerjaan dalam perjanjian kerjasama ini. Jangka waktu perjanjian adalah tiga tahun sejak penandatangan perjanjian dengan perpanjangan jangka waktu awal akan diperpanjang secara otomatis setiap kali untuk jangka waktu 1 (satu) tahun berikutnya.

Biaya jasa yang telah dibayarkan sampai dengan 31 Desember 2024 dan 2023 adalah sebesar:

41. SIGNIFICANT AGREEMENT (continued)

Agreement of Revamp of Mobile Banking, Internet Banking, and Business Internet Banking - PT Infosys Solusi Terpadu (continued)

Based on the First Addendum No. 004/DIR-VICT/PKS/11/24 dated November 28, 2024, there are changes to the Technical Requirements and the addition of provisions regarding the Project Timeline in this cooperation agreement. The term of the agreement is three years from the signing date, with the initial term being automatically extended each time for an additional 1 (one) year.

Service fees paid as of December 31, 2024 and 2023 are amounted:

	31 Desember/*December 31*,		
	2024	**2023**	
Rupiah	3.881.149	3.043.472	*Rupiah*

Perjanjian Pemeliharaan Sistem dan Pembelian Lisensi *Treasury* Opics – PT Sinergi Inti Solusi

Pada tanggal 22 Februari 2024, Bank dan PT Sinergi Inti Solusi telah menandatangani Perjanjian Kerjasama Pemeliharaan Sistem dan Pembelian Lisensi Treasury Opics, dimana PT Sinergi Inti Solusi setuju untuk memberikan layanan pemeliharaan sistem dan lisensi Treasury Opics.

Berdasarkan perjanjian ini, PT Sinergi Inti Solusi memiliki hak dan kewajiban sebagai berikut :

1. PT Sinergi Inti Solusi berhak mendapatkan pembayaran dari Bank;
2. PT Sinergi Inti Solusi akan menyediakan layanan kepada Bank dengan syarat-syarat dan ketentuan-ketentuan sesuai kesepakatan;
3. PT Sinergi Inti Solusi memberikan lisensi kepada Bank atas sistem dan bahan-bahan pendukung;
4. PT Sinergi Inti Solusi akan melakukan pemeliharaan corrective dalam waktu 2 (dua) minggu dan penempatan 2 (dua) PIC di Bank untuk mencegah terjadinya eror dalam hal pemeliharaan;
5. PT Sinergi Inti Solusi menjamin bahwa sistem akan berfungsi sesuai dengan bahan pendukung;
6. PT Sinergi Inti Solusi akan menyusun *log* pemeliharaan setelah menyelesaikan layanan pemeliharaan dan/atau perbaikan, dan menyerahkan log kepada Bank setiap bulan;

System Maintenance and Purchase License Agreement of Treasury Opics – PT Sinergi Inti Solusi

On February 22, 2024, the Bank and PT Sinergi Inti Solusi signed a Cooperation Agreement for System Maintenance and Purchase License Agreement of Treasury Opics, whereby PT Sinergi Inti Solusi agreed to provide services for system maintenance and license agreement of Treasury Opics.

Based on this agreement, PT Sinergi Inti Solusi has the following rights and obligations:

1. *PT Sinergi Inti Solusi is entitled to receive payment from the Bank;*
2. *PT Sinergi Inti Solusi will provide services to the Bank under the terms and conditions agreed upon;*
3. *PT Sinergi Inti Solusi grants the Bank a license for the system and supporting materials;*
4. *PT Sinergi Inti Solusi will perform corrective maintenance within 2 (two) weeks and place 2 (two) PICs at the Bank to prevent errors during maintenance;*
5. *PT Sinergi Inti Solusi guarantees that the system will function as per the supporting materials;*
6. *PT Sinergi Inti Solusi will prepare a maintenance log after completing the maintenance and/or repair services and submit the log to the Bank every month;*

41. PERJANJIAN PENTING (lanjutan)

Perjanjian Pemeliharaan Sistem dan Pembelian Lisensi *Treasury* Opics – PT Sinergi Inti Solusi (lanjutan)

Berdasarkan perjanjian ini, PT Sinergi Inti Solusi memiliki hak dan kewajiban sebagai berikut: (lanjutan)

7. PT Sinergi Inti Solusi akan menyelesaikan layanan dalam waktu 24 jam setelah menerima pemberitahuan eror. Jika layanan pemeliharaan dan/atau perbaikan tidak dapat diselesaikan dalam waktu 4 (empat) jam, maka PT Sinergi Inti Solusi akan menyediakan perlatan alternatif dan tidak akan mengenakan biaya tambahan kepada klien;
8. PT Sinergi Inti Solusi akan bertanggung jawab atas segala kerusakan yang diakibatkan oleh peristiwa yang terkait dengan Perjanjian ini, dan akan memberikan kompensasi kepada Bank atau pihak ketiga dari setiap biaya yang muncul; dan
9. PT Sinergi Inti Solusi bersedia diaudit oleh auditor internal Bank, atau Otoritas Jasa Keuangan atau pihak eksternal yang ditunjuk oleh Bank.

Berdasarkan Perjanjian Pertama No 001/DIR-VICT/PKS/02/2024 tanggal 22 Februari 2024, jangka waktu perjanjian adalah lima tahun sejak 1 Februari 2024 sampai 31 Januari 2029.

Biaya jasa yang telah dibayarkan sampai dengan 31 Desember 2024 adalah sebesar:

41. SIGNIFICANT AGREEMENT (continued)

System Maintenance and Purchase License Agreement of Treasury Opics – PT Sinergi Inti Solusi (continued)

Based on this agreement, PT Sinergi Inti Solusi has the following rights and obligations: (continued)

7. *PT Sinergi Inti Solusi will complete the service within 24 hours after receiving an error notification. If the maintenance and/or repair service cannot be completed within 4 (four) hours, PT Sinergi Inti Solusi will provide alternative equipment and will not charge any additional fees to the client;*
8. *PT Sinergi Inti Solusi will be responsible for any damages caused by events related to this Agreement and will compensate the Bank or third parties for any costs incurred; and*
9. *PT Sinergi Inti Solusi agrees to be audited by the Bank's internal auditor, the Financial Services Authority, or an external party appointed by the Bank.*

Based on the First Agreement No. 001/DIR-VICT/PKS/02/2024 dated February 22, 2024, the term of the agreement is five years, start from February 1, 2024, to January 31, 2029.

Service fees paid as of December 31, 2024 are amounted:

	31 Desember/*December 31*,		
	2024	**2023**	
Rupiah	4.883.440	-	*Rupiah*

42. SEGMEN OPERASI

Berikut adalah informasi segmen Bank berdasarkan segmen operasi:

42. OPERATING SEGMENT

The following is the segment information of the Bank based on operating segments:

	Untuk tahun yang berakhir pada tanggal 31 Desember/ *For the years ended December 31,*		
	2024	**2023**	
Pendapatan bunga - bersih	548.600.548	578.729.355	*Interest income - net*
Pendapatan operasional lainnya	365.735.651	253.365.261	*Other operating income*
Beban operasional lainnya	(621.366.151)	(658.023.481)	*Other operating expense*
Laba operasional	292.970.048	174.071.135	*Income from operations*
Jumlah aset	31.045.989.252	29.624.240.421	*Total assets*
Jumlah liabilitas	27.112.529.594	25.799.455.411	*Total liabilities*

42. SEGMEN OPERASI (lanjutan)

Berikut ini adalah informasi segmen Bank berdasarkan daerah geografis:

42. OPERATING SEGMENT (continued)

The following is the business segment information of the Bank based on geographical area:

	Untuk tahun yang berakhir pada tanggal 31 Desember 2024/ *For the year ended December 31, 2024*					
	Jadetabek/ *Jadetabek*	**Jawa Barat/ *West Java***	**Jawa Tengah & Jawa Timur /*Central & East Java***	**Luar Jawa/ *Non Java***	**Jumlah/ *Total***	
Pendapatan bunga - bersih	549.422.800	11.105.744	20.834.507	(32.762.503)	548.600.548	*Interest income - net*
Pendapatan operasional lainnya	345.167.012	1.479.627	8.440.580	10.648.432	365.735.651	*Other operating income*
Beban penyisihan kerugian penurunan nilai aset keuangan dan non-keuangan	(88.683.185)	(352.508)	(5.464.059)	(20.803.343)	(115.303.095)	*Provision for impairment losses on financial and non-financial assets*
Beban umum dan administrasi, tenaga kerja, kerugian atas perubahan nilai wajar dan lain-lain	(464.044.674)	(9.807.571)	(20.132.236)	(12.078.575)	(506.063.056)	*General and administrative expenses, personnel expenses, unrealised loss changes of fair value and others*
Laba (rugi) operasional	341.861.953	2.425.292	3.678.792	(54.995.989)	292.970.048	*Profit (loss) from operations*
Beban non operasional - bersih	(144.513.536)	425	161.267	41.920	(144.309.924)	*Non-operating expense - net*
Laba (rugi) sebelum beban pajak penghasilan	197.348.417	2.425.717	3.840.059	(54.954.069)	148.660.124	*Profit (loss) before income tax expense*
Beban pajak penghasilan	(30.800.886)	-	-	-	(30.800.886)	*Income tax expense*
Laba/(rugi) bersih tahun berjalan	166.547.531	2.425.717	3.840.059	(54.954.069)	117.859.238	*Profit/(loss) for the year*
Jumlah aset	29.256.279.747	292.161.024	1.159.177.057	338.371.424	31.045.989.252	*Total assets*
Jumlah liabilitas	24.853.241.727	318.504.148	1.017.510.824	923.272.895	27.112.529.594	*Total liabilities*

	Untuk tahun yang berakhir pada tanggal 31 Desember 2023/ *For the year ended December 31, 2023*					
	Jadetabek/ *Jadetabek*	**Jawa Barat/ *West Java***	**Jawa Tengah & Jawa Timur /*Central & East Java***	**Luar Jawa/ *Non Java***	**Jumlah/ *Total***	
Pendapatan bunga - bersih	605.904.033	7.712.804	(5.953.084)	(28.934.398)	578.729.355	*Interest income - net*
Pendapatan operasional lainnya	244.424.786	2.810.354	3.731.919	2.398.202	253.365.261	*Other operating income*
Beban penyisihan kerugian penurunan nilai aset keuangan dan non-keuangan	(153.988.492)	(1.238.620)	(25.868.360)	(6.449.486)	(187.544.958)	*Provision for impairment losses on financial and non-financial assets*
Beban umum dan administrasi, tenaga kerja, kerugian atas perubahan nilai wajar dan lain-lain	(441.807.754)	(6.792.939)	(11.014.661)	(10.863.169)	(470.478.523)	*General and administrative expenses, personnel expenses, unrealised loss changes of fair value and others*
Laba (rugi) operasional	254.532.573	2.491.599	(39.104.186)	(43.848.851)	174.071.135	*Profit (loss) from operations*
Beban non operasional - bersih	(44.647.412)	(910)	54.764	58.651	(44.534.907)	*Non-operating expense - net*
Laba (rugi) sebelum beban pajak penghasilan	209.885.161	2.490.689	(39.049.422)	(43.790.200)	129.536.228	*Profit (loss) before income tax expense*
Beban pajak penghasilan	(27.719.887)	-	-	-	(27.719.887)	*Income tax expense*
Laba/(rugi) bersih tahun berjalan	182.165.274	2.490.689	(39.049.422)	(43.790.200)	101.816.341	*Profit/(loss) for the year*
Jumlah aset	28.781.506.754	245.131.599	398.882.726	198.719.342	29.624.240.421	*Total assets*
Jumlah liabilitas	23.861.710.649	260.086.342	756.951.352	920.707.068	25.799.455.411	*Total liabilities*

43. JAMINAN PEMERINTAH TERHADAP KEWAJIBAN PEMBAYARAN BANK UMUM

Berdasarkan Undang-Undang Republik Indonesia No. 24 tanggal 22 September 2004, efektif sejak tanggal 22 September 2005, Lembaga Penjamin Simpanan (LPS) dibentuk untuk menjamin kewajiban tertentu bank-bank umum berdasarkan program penjaminan yang berlaku. Undang-Undang tersebut telah diubah dengan Peraturan Pemerintah sebagai Pengganti Undang-Undang No. 3 Tahun 2008, yang mana telah ditetapkan menjadi Undang-Undang sejak tanggal 13 Januari 2009 berdasarkan Undang-Undang Republik Indonesia No. 7 Tahun 2009.

Berdasarkan Peraturan Pemerintah Republik Indonesia No. 66/2008 tanggal 13 Oktober 2008 mengenai besarnya nilai simpanan yang dijamin LPS, pada tanggal 31 Desember 2024 dan 2023, jumlah simpanan yang dijamin LPS adalah simpanan sampai dengan Rp2.000.000 untuk nasabah per bank.

Bank adalah peserta dari program penjaminan tersebut dan beban premi penjaminan Pemerintah yang dibayar selama periode yang berakhir tanggal 31 Desember 2024 dan 2023 masing-masing adalah sebesar Rp43.691.208 dan Rp41.124.423.

43. GOVERNMENT GUARANTEE ON OBLIGATIONS OF PRIVATE BANKS

Based on Law No. 24 dated September 22, 2004, effective September 22, 2005, Indonesia Deposit Insurance Corporation (LPS) was established to provide guarantee on certain deposits from customers based on prevailing guarantee schemes. The law was changed with the Government Regulation as at the Replacement of Law No. 3 Year 2008, which was stipulated as a law since January 13, 2009 based on the Republic of Indonesia Law No. 7 Year 2009.

Based on Government of Republic of Indonesia Regulation No. 66/2008 dated October 13, 2008 regarding the deposit amount guaranteed by LPS, as of December 31, 2024 and 2023, the deposit amount guaranteed by LPS for every customer in a bank was a maximum of Rp2,000,000.

The Bank is a participant of this government guarantee program and the premium paid for the period ended December 31, 2024 and 2023 amounted to Rp43,691,208 and Rp41,124,423, respectively.

44. MANAJEMEN RISIKO

Bank telah menerapkan manajemen risiko yang independen dan sesuai dengan standar yang mengacu pada POJK No. 18/POJK.03/2016 tanggal 16 Maret 2016 tentang Penerapan Manajemen Risiko Bagi Bank Umum.

Kegiatan usaha Bank senantiasa dihadapkan pada risiko-risiko yang berkaitan erat dengan fungsinya sebagai lembaga intermediasi keuangan. Oleh karena itu, kegiatan operasional Bank dikelola dengan baik supaya tidak menimbulkan kerugian. Di dalam melaksanakan strategi bisnis Bank, maka manajemen berupaya untuk dapat menyelaraskan antara:

- Pertumbuhan bisnis dan peningkatan pangsa pasar kredit dan portofolio pendanaan.
- Peningkatkan efisiensi operasional perbankan.
- Menjaga tingkat kebutuhan modal minimum sesuai ketentuan otoritas.
- Implementasi manajemen risiko yang berorientasi bisnis.

44. RISK MANAGEMENT

The Bank has implemented independent risk management and in accordance with standards that refer to POJK No. 18/POJK.03/2016 dated March 16, 2016 regarding the Implementation of Risk Management for Commercial Banks.

Bank's business activities always faced with risks that are closely related to its function as a financial intermediary. Therefore, the Bank's operations are properly managed so it could prevent any harm. In the performance of the Bank's business strategy, management seeks to harmonise between:

- *Business growth and increased market share of credit and financing portfolios.*
- *Increasing the efficiency of banking operations.*
- *Maintain the level of minimum capital requirements pursuant to the authority.*
- *Implementation of business-oriented risk management.*

44. MANAJEMEN RISIKO (lanjutan)

Sebagai lembaga intermediasi keuangan, Bank menyadari bahwa semakin kompleksnya kegiatan usaha yang diikuti dengan perkembangan lingkungan internal maupun eksternal sehingga meningkatkan risiko dalam menjalankan kegiatan usahanya. Menyadari akan risiko yang dihadapi, Bank harus menerapkan kebijakan manajemen risiko yang baik dan dapat beradaptasi dengan perubahan yang terjadi dan meningkatkan praktek tata kelola yang sehat (*Good Corporate Governance*) pada keseluruhan lingkup aktivitas usaha.

Penerapan manajemen risiko yang efektif dengan mempertimbangkan segala aspek dan prinsip kehati-hatian (*prudential principles*) ini bertujuan untuk memastikan bahwa potensi yang timbul dalam kegiatan usahanya dapat diidentifikasi, diukur, dipantau, dan dimonitor akan memberikan manfaat berupa peningkatan kepercayaan *stakeholder*.

Dalam menunjang penerapan manajemen risiko, Bank senantiasa berupaya meningkatkan pengawasan aktif dari Dewan Komisaris dan Direksi, antara lain melalui unit kerja dan komite untuk menunjang proses pengendalian risiko. Hal ini diwujudkan dengan adanya Satuan Kerja Manajemen Risiko (SKMR) di bawah wadah Komite Manajemen Risiko yang berwenang dan bertanggung jawab dalam menyusun dan menetapkan kebijakan manajemen risiko serta perubahannya termasuk strategi manajemen risiko dan rencana kontinjensi apabila terjadi kondisi yang tidak diinginkan.

Selain hal tersebut di atas, terdapat komite lain yang bertugas untuk menangani risiko secara lebih spesifik, yaitu antara lain Komite Kredit Tingkat Direksi (KKD), *Assets and Liabilities Committee* (ALCO), Komite Teknologi Sistem Informasi, sedangkan pada level Dewan Komisaris terdapat Komite Pemantau Risiko, Komite Nominasi dan Remunerasi, Komite Audit dan Komite Tata Kelola Terintegrasi.

Semua Dewan Komisaris dan Direksi telah mengikuti Ujian Sertifikasi Manajemen Risiko yang diselenggarakan oleh Badan Sertifikasi Manajemen Risiko dan Lembaga Sertifikasi Profesi Perbankan.

44. RISK MANAGEMENT (continued)

As a financial intermediary institution, the Bank realises that the business activity is more complex and also depends with development of internal and external conditions that increase the Bank 's risk in conducting its business activities. Realising the risk it faces, the Bank must apply good risk management policy that can adapt with the changes and also enhance the Good Corporate Governance Practice in the whole activities of the Bank.

The effective application of risk management by considering all aspects and prudential principles which has objective to ensure that potential arises in conducting its business activities can be identified, measured, reviewed and monitored will give a benefit to increase stakeholder trust to the Bank.

In supporting the implementation of risk management, the Bank continuously improve the active monitoring from the Boards of Commissioners and Directors, including establishing several permanent working units and committee to support risks control process. This is implemented by establishing Risk Management Working Unit (SKMR) under Risk Management Committee who authorise and responsible to prepare and decide risk management policy and its changes including risk management strategy and contingency plan if an abnormal condition happens.

Besides the above matters, there are other committee to handle more specific risks, such as Credit Committee at Board of Directors level (KKD), Assets and Liabilities Committee (ALCO), Information System Technology Committee, whereas at the Board of Commissioners level, there are Risk Monitoring Committee, Nomination and Remuneration Committee, Audit Committee and Integrated Corporate Governance Commitee.

All of the Boards of Commissioners and Directors passed the examination of Risk Management Certification that was held by the Board of Risk the Management Certification and Banking Professional Certification Institute.

44. MANAJEMEN RISIKO (lanjutan)

Seiring dengan perkembangan globalisasi dan teknologi informasi, Lembaga Jasa Keuangan (LJK) merupakan salah satu industri yang memiliki sistem keuangan yang sangat kompleks, dinamis, dan saling terkait antar masing-masing sektor jasa keuangan baik dalam produk dan kelembagaan, maupun kepemilikan yang menyebabkan meningkatnya eksposur risiko. Menghadapi kondisi tersebut, penerapan manajemen risiko akan dilakukan secara terintegrasi dengan memperhatikan seluruh risiko, baik yang berasal dari perusahaan anak dan perusahaan terelasi (*sister company*), maupun entitas lainnya yang tergabung dalam suatu konglomerasi keuangan.

Manajemen Risiko Terintegrasi telah diterapkan secara komprehensif dan efektif sesuai POJK No. 17/POJK.03/2014 dan SEOJK No. 14/SEOJK.03/2015 tentang Penerapan Manajemen Risiko Terintegrasi Bagi Konglomerasi Keuangan. Bank telah ditunjuk sebagai Entitas Utama dalam hal Pengawasan Terintegrasi Konglomerasi Keuangan Grup Victoria.

Dalam menunjang penerapan manajemen risiko terintegrasi, maka Bank berupaya meningkatkan pengawasan aktif Dewan Komisaris dan Direksi, antara lain melalui Satuan Kerja Manajemen Risiko Terintegrasi (SKMRT) di bawah wadah Komite Manajemen Risiko Terintegrasi, sedangkan pada level Dewan Komisaris terdapat Komite Tata Kelola Terintegrasi.

Risiko kredit

Risiko kredit adalah risiko yang terjadi akibat kegagalan debitur dan/atau pihak lawan (*counterparty*) dalam memenuhi kewajiban mereka. Tujuan dari pengelolaan risiko kredit adalah untuk mengendalikan dan mengelola eksposur risiko kredit dalam parameter yang dapat diterima, sekaligus memaksimalkan *return on risk*.

Dalam mengelola risiko kredit, Bank telah memiliki kebijakan dan pedoman perkreditan, yang disempurnakan secara berkala, dengan tetap didasarkan pada prinsip pengelolaan risiko yang independen sesuai dengan peraturan OJK dan peraturan eksternal lainnya dan kebijakan manajemen risiko yang terkait dengan pemberian pinjaman. Pengelolaan risiko kredit mencakup aktivitas penyaluran kredit serta eksposur risiko kredit lainnya seperti penempatan, pembelian efek-efek dan penyertaan, yang dikelola secara komprehensif baik pada tingkat portofolio maupun transaksi.

44. RISK MANAGEMENT (continued)

As a response with the development of globalisation and information technology, Financial Services Institution (LJK) is one of industry which has a complex, dynamic and inter-related between each financial sector, both in product and organisation, and ownership which can increase the risk exposure. Facing this circumstances, the implementation of risk management will be performed integratedly by concerning all the risks, including from subsidiary and sister companies, and other financial entities included in one financial conglomeration.

Integrated Risk Management has been implemented comprehensively and effectively in accordance with POJK No. 17/POJK.03/2014 and SEOJK No. 14/SEOJK.03/2015 about Implementation of Integrated Risk Management for Financial Conglomeration. The Bank has been appointed as the main entity in the Integrated Monitoring of Financial Conglomeration is Victoria Group.

In supporting the implementation of integrated risk management, Bank encourage the active monitoring by Board of Directors and Board of Commissioners, such as through SKMRT under supervision of Integrated Risk Monitoring Committee, whereas at the Board of Commissioners level through the Integrated Corporate Governance Committee.

Credit risk

Credit risk is the risk by debtors and/or counterparty's failure to fulfill their obligations. The objective of credit risk management is to control and manage credit risk exposures within acceptable parameters, while optimising the return on risk.

In managing credit risk, the Bank has credit policies and standard operations, that are enhanced periodically in accordance with independent risk management principles based on OJK regulations and other external regulatory and risk management policies related to credit. Management of credit risk include lending activities and other credit risk exposures such as placement, purchase of securities and investments, which are managed comprehensively at both portfolio and transaction.

44. MANAJEMEN RISIKO (lanjutan)

Risiko kredit (lanjutan)

Bank melakukan evaluasi atas tingkat risiko kredit terkait pemberian fasilitas kepada nasabah atau proyek dengan mempertimbangkan berbagai faktor, antara lain sebagai berikut:

i. Historis dan proyeksi kondisi keuangan, termasuk laporan posisi keuangan, laporan laba rugi, dan laporan arus kas nasabah;

ii. Riwayat hubungan kredit;
iii. Kualitas, kinerja dan pengalaman dari pengelolaan nasabah;
iv. Sektor industri nasabah;
v. Kualitas agunan debitur, baik berupa aset berwujud maupun agunan setara kas;
vi. Posisi nasabah dalam persaingan industri sejenis; serta
vii. Kondisi ekonomi secara umum.

Terhadap eksposur risiko kredit yang lebih khusus seperti kredit perorangan, fasilitas antar bank dan sebagainya, Bank melakukan evaluasi secara tersendiri dengan menggunakan faktor yang mungkin berbeda, sesuai dengan karakteristik spesifik dari setiap jenis eksposur. Proses persetujuan fasilitas dengan eksposur risiko kredit dilakukan berdasarkan prinsip bahwa setiap fasilitas dan eksposur risiko kredit harus diproses melalui komite kredit dan/atau komite lainnya.

Selain itu, pengelolaan risiko kredit yang lebih spesifik juga dilakukan atas portofolio pinjaman yang bermasalah maupun eksposur risiko kredit lain. Upaya yang dilakukan di antaranya adalah restrukturisasi fasilitas pinjaman yang bermasalah, pengambilalihan agunan, dan pembentukan cadangan untuk menutup potensi kerugian, hingga pelaksanaan hapus buku. Bank telah menjalankan proses identifikasi, pengukuran, pemantauan, dan pengendalian risiko yang mencakup profil risiko kredit secara komprehensif. Dalam rangka pengendalian risiko kredit secara komprehensif, Bank terus meninjau dan menyempurnakan pelaksanaan fungsi pengendalian risiko kredit.

Manajemen risiko kredit diarahkan untuk meningkatkan keseimbangan antara ekspansi kredit yang sehat dengan pengelolaan pinjaman yang berprinsip kehati-hatian (*prudent*) agar terhindar dari risiko penurunan kualitas kredit atau menjadi *Non Performing Loan* (NPL), serta mengoptimalkan penggunaan modal yang dialokasikan untuk risiko kredit.

44. RISK MANAGEMENT (continued)

Credit risk (continued)

The Bank evaluates the credit risk level related to financing the customers or projects by considering various factors, which include the following:

i. Historical and projected financial condition, including statement of financial position, profit or loss, and statement of cash flows of the customers;
ii. Credit history;
iii. Quality, performance and experience of the customer's management;
iv. Customer's industry sector;
v. Debtor's collateral quality, both in form of tangible assets or cash equivalents;
vi. Customer's competitive position in the industry; and
vii. General economic conditions.

In relation to the specific credit risk exposure such as individual credit, inter-bank facility and others, the Bank separately evaluates based on other factors that may be different, according to the specific characteristics of each exposure. The approval process of facility with credit risk exposure are executed based on a principal that each facility and credit risk exposure approval must be processed through the credit committee and/or other committee.

Furthermore, specific credit risk management is performed on non-performing loan portfolio and other credit risk exposures. Such efforts, among others, are restructuring on non-performing loans, foreclosing assets and providing allowances to cover potential losses, and write-off. The Bank has identified, measured, monitored, and controlled risks which covers credit risk profile in a comprehensive risk management. In order to control credit risk in a comprehensive manner, the Bank continues to review and accomplish the implementation of credit risk control function.

Credit risk management is mainly to improve the balance of credit expansion and the prudent credit management that could mitigate the risk of the deterioration of loan quality or loans from becoming Non Performing Loan, and to optimise the use of capital allocated for the credit risk.

44. MANAJEMEN RISIKO (lanjutan)

Risiko kredit (lanjutan)

i. Pengukuran risiko kredit

Dalam mengukur risiko kredit untuk pinjaman yang diberikan, Bank mempertimbangkan estimasi kerugian saat debitur kemungkinan tidak dapat memenuhi kewajibannya dan estimasi kerugian atas kewajiban debitur yang telah wanprestasi. Untuk mengelola dan memantau risiko atas penyaluran pinjaman, secara rutin Bank melakukan analisis terhadap portofolio pinjaman dan segmentasi bisnis berdasarkan kualitas kredit dari debitur.

ii. Pengendalian batas risiko dan kebijakan mitigasi

Untuk menghindari risiko konsentrasi kredit, Bank menetapkan limit eksposur untuk setiap nasabah baik pihak berelasi maupun pihak ketiga dalam kebijakan batas maksimum pemberian pinjaman.

Bank mengelola, membatasi, dan mengendalikan konsentrasi risiko kredit, secara khusus terhadap debitur individu maupun kelompok, dan industri maupun geografis.

Batas pemberian pinjaman ditelaah mengikuti perubahan pada kondisi pasar dan ekonomi dan evaluasi kredit secara periodik dan penilaian atas kemungkinan wanprestasi.

Dalam proses pengajuan pinjaman, pembelian efek-efek maupun penempatan pada bank lain, Bank menetapkan *dual control* dalam rangka *four eyes principles* yang melibatkan petugas pemasaran, petugas pemeriksa dan pejabat yang berwenang.

Beberapa pengendalian spesifik lainnya dan pengukuran mitigasi dijelaskan di bawah ini:

Agunan

Pengelolaan risiko kredit terhadap pinjaman yang diberikan tidak hanya menjaga kualitas pinjaman namun juga memitigasi risiko dengan tambahan aset sebagai jaminan atas kewajiban kontraktual debitur. Beberapa jenis agunan yang diterima dalam rangka memitigasi risiko kredit antara lain:

- Kas (Deposito)
- Tanah dan/atau bangunan
- Mesin dan peralatan
- Kendaraan bermotor
- Piutang
- Persediaan
- Garansi perorangan/Perusahaan/Bank

44. RISK MANAGEMENT (continued)

Credit risk (continued)

i. Credit risk measurement

In measuring credit risk for loans, the Bank considers the estimated losses when debtor may be unable to meet its obligations and estimated losses on defaulting debtor's liabilities. To manage and monitor the credit risk, the Bank conducts a regular analysis of the loan portfolio and business segmentation based on the credit quality of debtor.

ii. Risk limit control and mitigation policies

To minimise the credit concentration risk, the Bank sets an exposure limit to each related and third parties as mentioned in the maximum lending limit policy.

The Bank manages, limits, and controls the credit concentration risk, in particular, to individual counterparties and groups, and to industries and geographies.

Lending limits are reviewed in the light of changing market and economic conditions and periodic credit reviews and assessments of probability of default.

In the loan application process, purchase of securities and placement with other banks, the Bank sets dual control as part of four eyes principles which involve marketing officers, supervisors and authorised approvers.

Some other specific controls and the mitigation measurement are explained as follows:

Collateral

Risk management of loans, not only maintain loans quality but also to mitigate the risk with additional assets as collateral to cover financial contractual obligation of debtors. Some of acceptable collateral to mitigate the credit risk such as:

- *Cash (Deposits)*
- *Land and/or building*
- *Machinery and equipment*
- *Vehicle*
- *Trade receivables*
- *Inventory*
- *Personal/Corporate/Bank Guarantee*

44. MANAJEMEN RISIKO (lanjutan)

44. RISK MANAGEMENT (continued)

Risiko kredit (lanjutan)

Credit risk (continued)

iii. Risiko kredit maksimum

iii. Maximum credit risk

Untuk aset keuangan yang diakui di laporan posisi keuangan, eksposur maksimum terhadap risiko kredit sama dengan nilai tercatat. Untuk bank garansi, eksposur maksimum terhadap risiko kredit adalah nilai maksimum yang harus dibayarkan oleh Bank jika liabilitas atas bank garansi terjadi. Untuk fasilitas pinjaman kepada nasabah yang belum digunakan, eksposur maksimum terhadap risiko kredit adalah sebesar komitmen tersebut.

For financial assets recognised on the statements of financial position, the maximum exposure to credit risk equals their carrying amount. For bank guarantees, the maximum exposure to credit risk is the maximum amount that the Bank has to pay if the obligations of the bank guarantees issued are called upon. For the unused loan facilities, the maximum exposure to credit risk is the committed amount.

Eksposur maksimum risiko kredit terhadap aset keuangan pada laporan posisi keuangan pada tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut:

The maximum exposure to credit risk of financial assets on statements of financial position as of December 31, 2024 dan 2023 are as follows:

	Eksposur maksimum/ *Maximum exposure*		
	31 Desember 2024/ *December 31, 2024*	**31 Desember 2023/ *December 31, 2023***	
Laporan posisi keuangan			*Statement of financial position*
Giro pada Bank Indonesia	1.401.052.981	1.493.076.850	*Current accounts with Bank Indonesia*
Giro pada bank lain	114.518.280	296.298.919	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	12.200.000	916.367.530	*Placements with Bank Indonesia and other banks*
Efek-efek	7.463.989.140	6.285.563.736	*Marketable securities*
Efek-efek yang dibeli dengan janji dijual kembali	197.775.620	636.732.554	*Securities purchased under resale agreement*
Pendapatan bunga yang masih akan diterima	320.839.465	386.167.151	*Interest income receivables*
Pinjaman yang diberikan	20.559.860.321	18.628.743.177	*Loans*
Penyertaan saham	219.933.809	215.930.505	*Investment in shares*
Tagihan akseptasi	17.791.739	12.474.839	*Acceptance receivables*
Aset lain-lain	21.740.496	23.076.537	*Other assets*
Jumlah	**30.329.701.851**	**28.894.431.798**	***Total***
Dikurangi:			*Less:*
Cadangan kerugian penurunan nilai	(465.703.975)	(614.260.677)	*Allowance for impairment losses*
Jumlah - bersih	**29.863.997.876**	**28.280.171.121**	***Total - net***

44. MANAJEMEN RISIKO (lanjutan)

44. RISK MANAGEMENT (continued)

Risiko kredit (lanjutan)

Credit risk (continued)

iii. Risiko kredit maksimum (lanjutan)

iii. Maximum credit risk (continued)

Eksposur maksimum risiko kredit terhadap rekening administratif pada tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut:

The maximum credit risk exposures relating to administrative accounts as of December 31, 2024 and 2023 are as follows:

	31 Desember/*December 31*,		
	2024	**2023**	
Rekening administratif			***Administrative accounts***
Fasilitas pinjaman yang belum digunakan	4.661.563.665	5.297.647.138	*Unused loan facilities*
Letter of credit	169.275.405	60.563.964	*Letter of credit*
Garansi yang diterbitkan	522.142.989	982.802.950	*Guarantees issued*
Jumlah	**5.352.982.059**	**6.341.014.052**	***Total***
Dikurangi:			*Less:*
Cadangan kerugian penurunan nilai	(1.270.842)	(547.808)	*Allowance for impairment losses*
Jumlah - bersih	**5.351.711.217**	**6.340.466.244**	***Total - net***

Tabel di atas menggambarkan eksposur maksimum atas risiko kredit bagi Bank pada tanggal 31 Desember 2024 dan 2023, sebelum memperhitungkan cadangan kerugian penurunan nilai kredit dan agunan. Untuk aset keuangan, eksposur di atas ditentukan berdasarkan nilai tercatat bruto seperti yang diungkapkan pada laporan posisi keuangan.

The table above shows the maximum exposure to credit risk for the Bank as of December 31, 2024 and 2023, gross of allowance for impairment losses and collateral. For financial assets, the exposures set out above are based on the gross carrying value as disclosed in the statements of financial position.

Seperti yang telah dijelaskan di atas, pada tanggal 31 Desember 2024 dan 2023 masing-masing sebesar 67,79% dan 64,47% dari jumlah eksposur maksimum adalah berasal dari pinjaman yang diberikan (sebelum memperhitungkan cadangan kerugian penurunan nilai).

As mentioned above, as of December 31, 2024 and 2023, amounted to 67.79% and 64.47% of the total maximum exposure, respectively, is derived from loans (gross of allowance for impairment losses).

iv. Evaluasi penurunan nilai

iv. Impairment assessment

Untuk tujuan akuntansi, Bank menggunakan model kerugian kredit ekspektasian untuk pengakuan kerugian penurunan nilai aset keuangan.

For accounting purposes, the Bank uses an expected credit loss model for the recognition of losses on impaired financial assets.

44. MANAJEMEN RISIKO (lanjutan)

Risiko kredit (lanjutan)

iv. Evaluasi penurunan nilai (lanjutan)

Pertimbangan utama evaluasi penurunan nilai pinjaman yang diberikan termasuk adanya pembayaran pokok atau bunga yang jatuh tempo lebih dari 30 (tiga puluh) hari dan 90 (sembilan puluh) hari atau terdapat kesulitan atau pelanggaran dari persyaratan yang terdapat dalam kontrak awal yang diketahui. Bank melakukan evaluasi penurunan nilai dalam 2 (dua) area yaitu evaluasi penurunan nilai secara individual dan evaluasi penurunan nilai secara kolektif.

a. Evaluasi penurunan nilai secara individual

Bank menentukan penyisihan kerugian penurunan nilai secara individual untuk masing-masing pinjaman signifikan yang diberikan dan memiliki bukti objektif penurunan nilai.

b. Evaluasi penurunan nilai secara kolektif

Evaluasi penyisihan kerugian penurunan nilai secara kolektif dilakukan atas pinjaman yang diberikan yang tidak signifikan secara individual dan juga untuk pinjaman signifikan yang diberikan yang tidak memiliki bukti objektif penurunan nilai.

v. Kualitas aset keuangan

Pada tanggal 31 Desember 2024 dan 2023, eksposur risiko kredit atas aset keuangan terbagi atas:

44. RISK MANAGEMENT (continued)

Credit risk (continued)

iv. Impairment assessment (continued)

The main considerations for the loan impairment assessment include whether any payments of principal or interest are overdue by more than 30 (thirty) days and 90 (ninety) days or there are any known difficulties, or infringement of the original terms of the contract. The Bank addresses impairment assessment in 2 (two) areas: individually assessed allowances and collectively assessed allowances.

a. Individually assessed allowances

The Bank determines the allowances for impairment losses for each significant loans on an individual basis and have objective evidence of impairment.

b. Collectively assessed allowances

Allowances for impairment losses are assessed collectively for losses on loans that are not individually significant and for individually significant loans with no objective evidence of impairment.

v. Quality of financial assets

As of December 31, 2024 and 2023, credit risk exposure relating to financial assets are divided as follows:

	31 Desember/ *December 31,* 2024				
	***Stage* 1**	***Stage* 2**	***Stage* 3**	**Jumlah/*Total***	
Giro pada Bank Indonesia	1.401.052.981	-	-	1.401.052.981	*Current accounts with Bank Indonesia*
Giro pada bank lain	114.518.280	-	-	114.518.280	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	12.200.000	-	-	12.200.000	*Placements with Bank Indonesia and other banks*
Efek-efek	7.463.989.140	-	-	7.463.989.140	*Marketable securities*
Efek-efek yang dibeli dengan janji dijual kembali	197.775.620	-	-	197.775.620	*Securities purchased under resale agreement*
Pinjaman yang diberikan	19.119.576.021	784.838.757	655.445.543	20.559.860.321	*Loans*
Pendapatan bunga yang masih akan diterima	264.098.649	54.995.381	1.745.435	320.839.465	*Interest income receivables*
Tagihan akseptasi	17.791.739	-	-	17.791.739	*Acceptance receivable*
Penyertaan saham	219.933.809	-	-	219.933.809	*Investment in shares*
Aset lain-lain	21.740.496	-	-	21.740.496	*Other assets*
Jumlah	**28.832.676.735**	**839.834.138**	**657.190.978**	**30.329.701.851**	***Total***
Dikurangi:					*Less:*
Cadangan kerugian penurunan nilai				(465.703.975)	*Allowance for impairment losses*
Jumlah - bersih				**29.863.997.876**	***Total - net***

44. MANAJEMEN RISIKO (lanjutan)

Risiko kredit (lanjutan)

v. Kualitas aset keuangan

Pada tanggal 31 Desember 2024 dan 2023, eksposur risiko kredit atas aset keuangan terbagi atas: (lanjutan)

44. RISK MANAGEMENT (continued)

Credit risk (continued)

v. Quality of financial assets

As of December 31, 2024 and 2023, credit risk exposure relating to financial assets are divided as follows: (continued)

	31 Desember/ *December 31,* 2023				
	***Stage* 1**	***Stage* 2**	***Stage* 3**	**Jumlah/ *Total***	
Giro pada Bank Indonesia	1.493.076.850	-	-	1.493.076.850	*Current accounts with Bank Indonesia*
Giro pada bank lain	296.298.919	-	-	296.298.919	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	916.367.530	-	-	916.367.530	*Placements with Bank Indonesia and other banks*
Efek-efek	6.285.563.736	-	-	6.285.563.736	*Marketable securities*
Efek-efek yang dibeli dengan janji dijual kembali	636.732.554	-	-	636.732.554	*Securities purchased under resale agreement*
Pinjaman yang diberikan	16.834.895.372	1.050.384.426	743.463.379	18.628.743.177	*Loans*
Pendapatan bunga yang masih akan diterima	286.842.088	99.325.063	-	386.167.151	*Interest receivables*
Tagihan akseptasi	12.474.839	-	-	12.474.839	*Acceptance receivable*
Penyertaan saham	215.930.505	-	-	215.930.505	*Investment in shares*
Aset lain-lain	23.076.537	-	-	23.076.537	*Other assets*
Jumlah	**27.001.258.930**	**1.149.709.489**	**743.463.379**	**28.894.431.798**	***Total***
Dikurangi: Cadangan kerugian penurunan nilai				(614.260.677)	*Less: Allowance for impairment losses*
Jumlah - bersih				**28.280.171.121**	***Total - net***

Dalam menentukan kualitas kredit berdasarkan segmen klien dipantau dan dianalisis berdasarkan hari tunggakan (*days past due*) dan kriteria kualitatif sebagaimana dijelaskan pada Catatan 2g.

In determining credit quality by client segment are monitored and analised based on days past due and qualitative criteria as explained in Note 2g.

Dalam hal terdapat keraguan terhadap kemampuan debitur untuk melakukan pembayaran kontraktual pada saat jatuh tempo, persyaratan kredit dapat dinegosiasikan kembali berdasarkan kesepakatan antara Bank dan debitur.

Where there is doubt on the ability of the debtors to meet contractual payments when due, the terms of the loans might be renegotiated based on mutual agreement between the Bank and the debtors.

44. MANAJEMEN RISIKO (lanjutan)

Risiko kredit (lanjutan)

v. Kualitas aset keuangan (lanjutan)

Dampak langsung dan tidak langsung atas pandemi COVID-19 mempengaruhi perekonomian global, pasar, dan pihak lawan maupun debitur dari Bank. Manajemen telah melakukan langkah-langkah untuk memitigasi dampak terhadap bisnis Bank sebagai berikut:

- Mempersiapkan skema restrukturisasi/ relaksasi kredit sementara untuk debitur yang terdampak COVID-19.
- Melakukan penyaluran pinjaman yang diberikan secara selektif dengan menerapkan prinsip kehati-hatian.
- Meningkatkan upaya penagihan dan penyelesaian kredit bermasalah.
- Melakukan efisiensi biaya operasional.
- Menerapkan manajemen risiko likuiditas secara optimum untuk menjaga posisi likuiditas Bank.

Manajemen juga melakukan analisa berdasarkan risiko atas sektor-sektor yang paling terkena dampak penurunan akibat COVID-19, dan melakukan review kualitatif atas perhitungan ECL terhadap sektor-sektor tersebut untuk meyakinkan bahwa ECL mencukupi.

Untuk debitur yang masih memiliki prospek usaha serta kemampuan membayar kewajiban, Bank dapat memberikan relaksasi kredit antara lain dalam bentuk perpanjangan tenor disesuaikan dengan siklus usaha debitur saat ini (pada umumnya untuk masa hingga 1 tahun). Sementara untuk debitur yang membutuhkan waktu pemulihan relatif lebih lama, dapat diberikan restrukturisasi kredit, antara lain dalam bentuk pemberian masa tenggang/penundaan pembayaran dan/atau penurunan suku bunga.

Sampai dengan tanggal 31 Desember 2024 dan 2023, terdapat 186 dan 235 debitur dengan total pinjaman sebesar Rp2.206.449.707 dan Rp2.868.304.020 yang telah direstrukturisasi.

44. RISK MANAGEMENT (continued)

Credit risk (continued)

v. Quality of financial assets (continued)

Direct and indirect effects of the COVID-19 outbreak are impacting the global economy, markets, and the counterparties and debtor of the Bank. Management has taking actions to mitigate the impacts on the Bank's business as follows:

- *Establish various temporary credit restructuring/relaxation scheme for customers affected by COVID-19.*
- *Provide loans to customers selectively with prudent principles.*
- *Increase efforts on collections and settlements of non-performing loans.*
- *Manage operational expenses efficiently.*
- *Implement liquidity risk management optimally to secure the Bank's liquidity position.*

Management also performs a risk-based assessment of those sectors most impacted by the COVID-19 downturn, and performs a qualitative review of the ECL calculation associated with those sectors to ensure that overall ECL is sufficient.

For debtors who still have good business prospects and the ability to pay, the Bank can provide loan relaxation, among others through tenor extension in accordance with the debtor's current business cycle (generally for period up to 1 year). Meanwhile, for debtors who need relatively longer recovery time, its can be given loan restructuring, among others in the form of grace period/payment holiday and/or a reduction in interest rates.

As of December 31, 2024 and 2023, there are 186 and 235 debtors with total outstanding loans of Rp2,206,449,707 and Rp2,868,304,020 respectively which have been restructured.

44. MANAJEMEN RISIKO (lanjutan)

Risiko kredit (lanjutan)

v. Kualitas aset keuangan (lanjutan)

Manajemen telah berupaya untuk memperbaiki kualitas kredit Bank dan menjaga rasio NPL dibawah ketentuan maksimal yang dipersyaratkan oleh OJK dengan melakukan hal-hal sebagai berikut:

- Melakukan *cessie* pinjaman untuk debitur yang masuk ke dalam kategori pinjaman yang bermasalah;
- Mentransfer pinjaman untuk debitur yang masuk ke dalam kategori pinjaman yang bermasalah menjadi Aset Yang Diambil Alih ("AYDA") dengan mengambil alih agunan yang dijaminkan oleh debitur;
- Membuat pembentukan cadangan kerugian penurunan nilai tambahan untuk pinjaman; dan
- Melakukan restrukturisasi pinjaman sesuai dengan ketentuan dari OJK.

Mengingat model perhitungan kerugian kredit ekspektasian tidak sepenuhnya dapat menghasilkan estimasi kerugian yang akurat dalam kondisi ekonomi yang abnormal, maka Manajemen juga sudah memperhitungkan beberapa faktor penyesuaian untuk memastikan nilai kerugian kredit ekspektasian yang diakui dalam laporan keuangan dinyatakan secara wajar. Dalam menilai kondisi masa depan, manajemen telah mempertimbangkan berbagai informasi relevan yang tersedia, termasuk kebijakan COVID-19 yang dikeluarkan oleh pemerintah untuk mendukung dan mengurangi dampak penyebaran COVID-19 terhadap perekonomian, dan mendorong Bank untuk menunda atau merestrukturisasi pinjaman.

Dalam kondisi normal, penjadwalan ulang atau restrukturisasi pinjaman akan menunjukkan peningkatan risiko kredit yang signifikan dan pindah ke *Stage 2*. Namun, dalam kondisi saat ini, manajemen telah mempertimbangkan bahwa restrukturisasi atau peristiwa tidak secara otomatis memicu peningkatan risiko kredit yang signifikan jika debitur diharapkan untuk memulihkan dan memenuhi kewajiban kontraktual mereka setelah akhir periode restrukturisasi atau relaksasi.

44. RISK MANAGEMENT (continued)

Credit risk (continued)

v. Quality of financial assets (continued)

Management has made efforts to improve the quality of the Bank's credit and maintain the NPL ratio below the maximum stipulated by the OJK by doing the following:

- *Conduct a loan cessie for debtors who fall into the non-performing loan category;*
- *Transferring loans for debtors that are categorised as non-performing loans into Foreclosed Assets ("AYDA") by taking over the collateral guaranteed by the debtor;*
- *Create an additional allowance for impairment losses for loans; and*
- *Performed loan restructuring in accordance with the provisions of the OJK.*

Considering that the expected credit loss calculation model cannot produce an accurate estimation of losses in abnormal economic conditions, Management has also taken into account several adjustment factors to ensure the expected value of the expected credit loss recognised in the financial statements is stated fairly. In assessing future conditions, management has considered various relevant information available, including COVID-19 policies issued by the government to support and mitigate the impact of the spread of COVID-19 on the economy, and encouragement for banks to defer or restructure loans.

Under normal conditions, a rescheduling or restructuring of a loan would indicate a significant increase in credit risk and a move to Stage 2. However, in the current condition, management has considered that such a restructuring or event was not automatically trigger a significant increase in credit risk if the debtor would be expected to recover and fulfill their contractual obligations after the end of the restructuring or relaxation period.

44. MANAJEMEN RISIKO (lanjutan)

Risiko kredit (lanjutan)

v. Kualitas aset keuangan (lanjutan)

Asumsi dan pertimbangan utama dalam menentukan kerugian kredit ekspektasian

Lifetime

Kerugian kredit ekspektasian diestimasikan berdasarkan periode dimana Bank terpapar pada risiko kredit. Bank memiliki proses review dari setiap model bisnis/produknya. Baik kredit *revolving* maupun *non-revolving*, untuk menghitung kerugian kredit ekspektasian menggunakan jangka waktu kontraktual sesuai dengan jangka waktu kontraknya. Penetapan periode tersebut khususnya untuk kredit revolving dilakukan dengan mempertimbangkan kondisi dimana proses perpanjangan kredit revolving yang diberikan oleh Bank dilakukan melalui kajian yang *robust* yaitu melalui evaluasi yang substantif dibandingkan administratif.

Lingkungan ekonomi yang berkembang adalah penentu utama dari kemampuan nasabah Bank untuk memenuhi kewajiban mereka saat jatuh tempo. Ini adalah prinsip dasar PSAK 109 (dahulu PSAK 71) bahwa potensi kerugian kredit di masa depan harus bergantung tidak hanya pada kesehatan ekonomi saat ini, tetapi juga harus memperhitungkan kemungkinan perubahan pada lingkungan ekonomi. Misalnya, jika Bank mengantisipasi perlambatan tajam dalam ekonomi dunia, Bank harus membentuk lebih banyak cadangan hari ini untuk menyerap kerugian kredit yang kemungkinan akan terjadi dalam waktu dekat.

Untuk menangkap efek perubahan pada lingkungan ekonomi, model PD digunakan untuk menghitung kerugian kredit ekspektasian, dengan memasukkan informasi *forward looking* dalam bentuk perkiraan nilai-nilai variabel ekonomi yang kemungkinan akan berdampak pada kemampuan pembayaran kembali nasabah Bank.

Berbagai MEV digunakan untuk setiap model PD, tergantung pada hasil analisis statistik kesesuaian MEV dengan PD serta konsensus dari pakar kredit. Diantaranya adalah indeks barang konsumtif, inflasi, dan GDP Nasional.

44. RISK MANAGEMENT (continued)

Credit risk (continued)

v. Quality of financial assets (continued)

Key assumptions and judgments in determining expected credit loss

Lifetime

Expected credit loss is estimated based on the period over which the Bank is exposed to credit risk. The Bank has a review process for each of its business models/products. Both revolving and non-revolving loans, to calculate expected credit losses using the contractual term in accordance with the contract period. Determination of this period, especially for revolving credit, is carried out by taking into account the conditions in which the Bank carries out the process of extending revolving credit through a robust study, namely through a substantive compared to administrative evaluation.

The developing economic environment is the key determinant of the ability of a Bank's customer to meet their obligations as they fall due. It is a fundamental principle of SFAS 109 (previously SFAS 71) that the potential future credit losses should depend not just on the health of the economy today, but should also take into account potential changes to the economic environment. For example, if the Bank was to anticipate a sharp slowdown in the world economy, Bank should make more provisions today to absorb the credit losses likely to occur in the near future.

To capture the effect of changes to the economic environment, PD model is used to calculate expected credit loss, by incorporating forward-looking information in the form of forecasts of the values of economic variables that are likely to have an effect on the repayment ability of the Bank's customer.

Various of MEVs are used for each PD model, depending on the statistical analysis result of appropriateness of the MEV with PD as well as consensus from credit expert. Amongst others are consumer goods index, inflation and National GDP.

44. MANAJEMEN RISIKO (lanjutan)

Risiko kredit (lanjutan)

v. Kualitas aset keuangan (lanjutan)

Asumsi dan pertimbangan utama dalam menentukan kerugian kredit ekspektasian (lanjutan)

Sensitivitas MEV terhadap ECL

Perhitungan ECL bergantung pada beberapa variabel dan pada dasarnya tidak linier dan tergantung pada portofolio, yang menyiratkan bahwa tidak ada analisis tunggal yang dapat sepenuhnya menunjukkan sensitivitas kerugian kredit ekspektasian terhadap perubahan dalam MEV. Bank berkeyakinan bahwa sensitivitas harus dilakukan terhadap seluruh variabel, alih-alih variabel tunggal, karena hal ini sejalan dengan sifat multi-variabel dari perhitungan ECL.

Analisis sensitivitas ECL dilakukan untuk mengeksplorasi efek dari pandemi global COVID-19 yang menyebabkan perlambatan ekonomi Indonesia.

Risiko pasar

Risiko pasar adalah risiko pada laporan posisi keuangan dan rekening administratif termasuk transaksi derivatif, akibat perubahan secara keseluruhan dari kondisi pasar, termasuk risiko perubahan harga opsi. Risiko pasar meliputi, antara lain, risiko tingkat suku bunga, risiko nilai tukar, risiko ekuitas dan risiko komoditas. Risiko tingkat suku bunga, risiko nilai tukar dan risiko komoditas dapat berasal baik dari posisi *trading book* maupun posisi *banking book*, sedangkan risiko ekuitas berasal dari posisi *trading book*. *Assets & Liabilities Committee* (ALCO) merupakan komite yang membantu Direksi dalam mengawasi dan mengelola risiko pasar.

Risiko pasar melekat pada aktivitas fungsional Bank seperti kegiatan *treasury* dan investasi dalam bentuk efek-efek dan pasar uang maupun penyertaan pada lembaga keuangan lainnya, penyediaan dana dan pinjaman, kegiatan pendanaan dan penerbitan surat utang, serta kegiatan pembiayaan perdagangan. Untuk itu, Bank harus dan selalu melakukan identifikasi dan pemantauan dari waktu ke waktu untuk mengantisipasi adanya risiko pasar.

44. RISK MANAGEMENT (continued)

Credit risk (continued)

v. Quality of financial assets (continued)

Key assumptions and judgments in determining expected credit loss (continued)

Sensitivity of MEV to ECL

The ECL calculation relies on multiple variables and is inherently non-linear and portfolio-dependent, which implies that no single analysis can fully demonstrate the sensitivity of the expected credit loss to changes in the MEVs. The Bank believes that sensitivity should be performed to all variables, instead of single variable, as this aligns with the multi-variable nature of the ECL calculation.

A sensitivity analysis of ECL was undertaken to explore the effect of the global COVID-19 pandemic that leads to Indonesia economy slowdown.

Market risk

Market risk is the risk on the statements of financial position and administrative accounts, including derivative transactions, due to overall changes in market conditions, including the risk of change of option price. Market risk include, among others, interest rate risk, foreign exchange risk, equity risk and commodity risk. Interest rate risk, foreign exchange risk and commodity risk can come from trading book and banking book, whereas equity risk come from trading book. Assets & Liabilities Committee (ALCO) is a committee assisting Directors in monitoring and maintaining market risk.

Market risk is adhered on functional activities of the Bank such as treasury activity and investment in securities and money market or investment in other financing institution, funding and lending, funding activity and issued obligation and financing trading activity. The Bank must and always identify and monitor from time to time to anticipate the market risk.

44. MANAJEMEN RISIKO (lanjutan)

Risiko pasar (lanjutan)

Tujuan dari manajemen risiko pasar adalah untuk melakukan identifikasi, pengukuran, pengendalian, dan pengelolaan eksposur risiko pasar dalam parameter yang dapat diterima, serta memaksimalkan tingkat pengembalian. Hal ini dilakukan melalui kebijakan yang komprehensif dan kerangka limit untuk mengidentifikasi, mengukur, dan memantau nilai risiko berdasarkan tingkat risiko yang akan diambil (*risk appetite*) oleh Bank.

Dalam melakukan pengukuran risiko pasar, Bank menggunakan perhitungan Metode Standar untuk menghitung Kewajiban Penyediaan Modal Minimum (KPMM) untuk risiko pasar.

Risiko tingkat suku bunga

Risiko tingkat suku bunga timbul dari adanya kemungkinan bahwa perubahan tingkat suku bunga akan mempengaruhi arus kas masa depan dari nilai wajar instrumen keuangan.

Dalam rangka meminimalkan risiko tingkat suku bunga, Bank melakukan upaya-upaya sebagai berikut, antara lain:

- Meningkatkan fungsi dan peran *Assets & Liabilities Committee* (ALCO) dalam rangka identifikasi dan penetapan tingkat suku bunga pinjaman dan dana pihak ketiga untuk mengantisipasi fluktuasi suku bunga pasar.

- Penerapan Kebijakan *Assets & Liabilities Management* (ALMA) untuk pihak berelasi dalam penerapan manajemen risiko Bank dan merupakan salah satu pedoman bagi unit kerja *Treasury* dalam melakukan transaksi di pasar uang dan pasar modal seperti:

  i. Melakukan identifikasi risiko tingkat suku bunga yang berasal dari transaksi dan portofolio Bank pada Efek-efek;

  ii. Penetapan sistem pengukuran risiko tingkat suku bunga dengan menggunakan *gap analysis* atau *duration analysis*; dan

  iii. Strategi penanaman dana dan strategi pengumpulan dana.

44. RISK MANAGEMENT (continued)

Market risk (continued)

The objective of market risk management is to identify, measure, control, and manage market risk exposures within acceptable parameters, while optimising the returns. This is done through a comprehensive policy and limit framework to indentify, measure, and monitor the amount of risk based on risk appetite of the Bank.

In measuring market risk, the Bank uses the Standardised Method in calculating Capital Adequacy Ratio (CAR) for market risk.

Interest rate risk

Interest rate risk arise from the possibility that changes in interest rates will affect future cash flows or the fair values of financial instruments.

To minimise interest rate risk, the Bank makes the following efforts, among others:

- *Increasing function and role of Assets & Liabilities Committee (ALCO) in identifying and determining interest rate and third party funds to anticipate fluctuations in market interest rate.*

- *Application of Assets & Liabilities Management's (ALMA) policy to related parties in application of risk management of the Bank and it is one of a guidance for Treasury working unit in money market and capital market transactions such as:*

  i. Identifying interest rate risk from transaction and Bank's portfolio of securities;

  ii. Determining measuring system of interest rate risk using gap analysis or duration analysis; and

  iii. Strategies of investment and collection of funds.

44. MANAJEMEN RISIKO (lanjutan)

44. RISK MANAGEMENT (continued)

Risiko pasar (lanjutan)

Market risk (continued)

Risiko tingkat suku bunga (lanjutan)

Interest rate risk (continued)

Tabel berikut merupakan kisaran tingkat suku bunga kontraktual per tahun untuk aset dan liabilitas keuangan yang signifikan untuk tahun yang berakhir pada tanggal 31 Desember 2024 dan 2023:

The following table summarises the range of contractual interest rates per annum for significant financial assets and liabilities for the years ended December 31, 2024 and 2023:

	31 Desember/*December 31*,		
	2024	**2023**	
Aset			***Assets***
Giro pada bank lain	0,00% - 2,00%	0,00% - 0,25%	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	5,60% - 6,75%	5,20% - 6,45%	*Placements with Bank Indonesia and other banks*
Efek-efek	2,35% - 11,00%	4,95% - 11,00%	*Marketable securities*
Efek-efek yang dibeli dengan janji dijual kembali	6,55% - 6,65%	6,25% - 6,35%	*Securities purchased under resale agreements*
Pinjaman yang diberikan	1,00% - 18,00%	1,00% - 20,00%	*Loans*
Liabilitas			***Liabilities***
Simpanan nasabah	0,00% - 8,00%	0,00% - 8,20%	*Deposits from customers*
Simpanan dari bank lain	0,00% - 7,00%	0,00% - 6,50%	*Deposits from other banks*
Efek-efek yang diterbitkan	9,25% - 11,75%	9,25% - 11,75%	*Securities issued*
Efek-efek yang dijual dengan janji dibeli kembali	6,55% - 6,65%	6,25% - 6,35%	*Securities sold under repurchase agreements*

Sensitivitas terhadap laba bersih

Sensitivity to net income

Tabel di bawah ini mengikhtisarkan sensitivitas laba bersih Bank pada tanggal 31 Desember 2024 dan 2023 atas perubahan tingkat suku bunga (tidak diaudit):

The following table summarises the sensitivity of Bank's net income to movement of interest rates on December 31, 2024 and 2023 (unaudited):

	31 Desember/*December 31*, 2024		
	Peningkatan dalam 100 basis poin/ *Increase by 100 basis point*	**Penurunan dalam 100 basis poin/ *Decrease by 100 basis point***	
Pengaruh terhadap laba bersih	5.564.767	(5.564.767)	*Impact to net income*

	31 Desember/*December 31*, 2023		
	Peningkatan dalam 100 basis poin/ *Increase by 100 basis point*	**Penurunan dalam 100 basis poin/ *Decrease by 100 basis point***	
Pengaruh terhadap laba bersih	5.841.118	(5.841.118)	*Impact to net income*

44. MANAJEMEN RISIKO (lanjutan)

Risiko pasar (lanjutan)

Risiko tingkat suku bunga (lanjutan)

Proyeksi di atas mengasumsikan bahwa tingkat suku bunga bergerak pada jumlah yang sama, sehingga tidak mencerminkan pengaruh potensial laba atas perubahan beberapa tingkat suku bunga sementara yang lainnya tidak berubah. Proyeksi juga mengasumsikan bahwa seluruh variabel lainnya adalah konstan dan berdasarkan tanggal pelaporan yang konstan serta seluruh posisi hingga jatuh tempo.

Risiko likuiditas merupakan risiko akibat ketidakmampuan Bank memenuhi kewajiban yang jatuh tempo dari sumber pendanaan arus kas dan/atau dari aset likuid berkualitas tinggi yang dapat diagunkan, tanpa mengganggu aktivitas dan kondisi keuangan Bank. Ketidakmampuan memperoleh sumber pendanaan arus kas sehingga menimbulkan risiko likuiditas dapat disebabkan antara lain oleh:

a. Ketidakmampuan menghasilkan arus kas yang berasal dari aset produktif maupun yang berasal dari penjualan aset termasuk aset likuid; dan/atau
b. Ketidakmampuan menghasilkan arus kas yang berasal dari penghimpunan dana dan transaksi antar Bank.

Risiko likuiditas berhubungan dengan adanya kemungkinan Bank tidak dapat memenuhi kewajibannya terhadap deposan, investor atau kreditur yang diantaranya disebabkan dari keterbatasan akses pendanaan atau ketidakmampuan Bank untuk melikuidasi aset yang dimiliki dengan harga yang wajar. *Assets and Liabilities Committee* (ALCO) merupakan komite yang membantu Direksi dalam mengawasi dan mengelola risiko likuiditas.

Secara umum, tujuan utama manajemen risiko untuk risiko likuiditas adalah untuk meminimalkan kemungkinan ketidakmampuan Bank dalam memperoleh sumber pendanaan arus kas. Dengan demikian Bank dapat memenuhi setiap kewajiban keuangan yang sudah diperjanjikan secara tepat waktu, dan agar senantiasa dapat memelihara tingkat likuiditas yang memadai dan optimal.

44. RISK MANAGEMENT (continued)

Market risk (continued)

Interest rate risk (continued)

The projection above assumes that interest rates of all maturities move by the same amount and, therefore, do not reflect the profit potential impact on the changes of some interest rates while others remain unchanged. The projections also assume that all other variables are held constant and based on a constant reporting date position and that all positions run to maturity.

Liquidity risk is the risk arising from the inability of the Bank to meet the maturing obligations from cash flow funding sources and/or from high-quality liquid assets that can be pledged, without disturbing the activities and financial condition of the Bank. The inability to obtain funding for cash flows resulting to liquidity risk can be contributed by:

a. Inability to generate cash flows from productive assets as well as from the sale of assets, including liquid assets; and/or
b. Inability to generate cash flows from funding and interbank transactions.

Liquidity risk related with the possibility of Bank's inability to meet the maturing obligations to its customers, investors or creditors in which due to the limitation of funding line or inability of the Bank to liquidate its assets with the fair value. Assets and Liabilities Committee (ALCO) is a commitee under Director who monitor and manage liquidity risk.

In general, the main purpose of liquidity risk management is to minimise the possibility of the Bank's inability to obtain sources of financing. Thus the Bank can fulfill any financial obligations as they fall due in a timely manner, and in order to maintain an adequate and optimal level of liquidity.

44. MANAJEMEN RISIKO (lanjutan)

Risiko likuiditas

Kebijakan pengelolaan risiko likuiditas antara lain mencakup pengawasan aktif Dewan Komisaris dan Direksi, yang pada intinya mengatur penerapan Manajemen Risiko likuiditas pada Bank, Kebijakan Manajemen Risiko likuiditas yang secara umum mencakup strategi manajemen risiko likuiditas, tingkat risiko yang akan diambil (*risk appetite*) dan toleransi risiko (*risk tolerance*) dan Sistem Informasi Manajemen Risiko serta Sistem Pengendalian Internal dengan menerapkan pengendalian internal dan kaji ulang independen yang memadai terhadap penerapan Manajemen Risiko untuk Risiko likuiditas yang dilaksanakan oleh Satuan Kerja Audit Internal (SKAI) dan Satuan Kerja Manajemen Risiko (SKMR).

Tujuan dari manajemen risiko likuiditas adalah untuk memastikan bahwa setiap kebutuhan dana di saat ini maupun di masa datang baik untuk kondisi normal maupun kondisi stres dapat dipenuhi.

Bank mengelola risiko likuiditas melalui analisis perbedaan jatuh tempo likuiditas dan rasio-rasio likuiditas. Risiko likuiditas diukur dan dipantau secara harian berdasarkan kerangka kerja limit risiko likuiditas. Analisis kesenjangan likuiditas memberikan pandangan terhadap ketidaksesuaian arus kas masuk dengan arus kas keluar pada waktu tertentu. Kondisi ini dikelola secara terpusat oleh Tresuri yang mempunyai akses dan otorisasi secara langsung ke *interbank*, *wholesale* dan *professional market* lainnya, dalam upaya membantu aktivitas utama bisnis Bank seperti pengumpulan dana dan pemberian pinjaman.

Langkah yang diambil oleh Bank sehubungan dengan perbedaan antara aset dan liabilitas keuangan yang jatuh tempo antara 1 (satu) sampai dengan 3 (tiga) bulan, adalah meningkatkan pelayanan kepada nasabah simpanan, memantau perpanjangan simpanan, mencari nasabah baru serta menawarkan produk dan bunga yang menarik kepada nasabah untuk menjaga stabilitas dan kontinuitas jumlah simpanan dari nasabah. Di samping itu, Bank juga mengintensifkan usaha penagihan kepada debitur bermasalah dan menempatkan kelebihan dana pada efek-efek yang memiliki pasar sehingga dapat dicairkan setiap saat apabila Bank membutuhkan dana.

44. RISK MANAGEMENT (continued)

Liquidity risk

Liquidity risk management policies include the active supervision of the Board of Commissioners and Board of Directors, which basically set the implementation of the Bank's Liquidity Risk Management, Liquidity Risk Management Policy which generally include liquidity risk management strategy, the level of risk to be taken (risk appetite) and risk tolerance (risk tolerance) and Information Systems Risk Management and Internal Control System by implementing internal control and review of appropriate independent of the implementation of Risk Management for liquidity risk is carried out by the Internal Audit (SKAI) and Risk Management Unit (SKMR).

The objective of liquidity risk management is to ensure that current and future fund requirements can be met both in normal or stress condition.

The Bank manages liquidity risk through liquidity gap analysis and liquidity ratios. Liquidity risk is measured and monitored on a daily basis based on liquidity risk limit framework. Liquidity gap analysis provides insight as to the mismatch of expected cash inflows against cash outflows on any given day. This is centrally managed within Treasury which has direct and authorised access to interbank, wholesale and other professional markets, to supplement core Bank activities such as deposit taking and lending.

The steps taken by the Bank in connection with the maturity gap mismatch between its financial assets and liabilities due in 1 (one) to 3 (three) months such as improving its services to customers, monitor the extension of deposit, search for new customers and offering services including attractive products and interest rates in order to maintain stability and continuity of deposits from customers. In addition, the Bank also intensify collection efforts from non-performing debtors and placing excess funds on marketable securities so they can be withdrawn at any time as the Bank needs a fund.

44. MANAJEMEN RISIKO (lanjutan)

Risiko likuiditas (lanjutan)

Tabel jatuh tempo berikut ini menyajikan informasi mengenai perkiraan jatuh tempo dari liabilitas sesuai arus kas kontraktual yang tidak didiskontokan tanggal 31 Desember 2024 dan 2023:

44. RISK MANAGEMENT (continued)

Liquidity risk (continued)

The maturity tables below provide information about maturities on contractual undiscounted cash flows of liabilities on December 31, 2024 and 2023:

	31 Desember/ *December 31*, 2024							
	Jumlah/ *Total*	Tidak mempunyai kontrak jatuh tempo/ Dibayarkan sesuai permintaan/ *No contractual maturity/ Repayable on demand*	≤ 1 bulan/ *≤ 1 month*	> 1 bulan-3 bulan/ *> 1 month 3 months*	> 3 bulan-1 tahun/ *> 3 months 1 year*	> 1 - 5 tahun/ *> 1 - 5 years*	Lebih dari 5 tahun/ *More than 5 years*	
Liabilitas								***Liabilities***
Simpanan nasabah	23.468.794.821	6.108.873.248	8.924.408.989	5.045.857.702	3.349.654.882	40.000.000	-	*Deposits from customers*
Simpanan dari bank lain	688.839.554	259.466.889	383.361.716	28.828.095	8.223.514	8.959.340	-	*Deposits from other banks*
Efek-efek yang diterbitkan	2.911.187.503	-	-	-	369.250.000	2.541.937.503	-	*Securities issued*
Efek-efek yang dijual dengan janji dibeli kembali	590.631.264	492.189.611	98.441.653	-	-	-	-	*Securities sold under repurchase agreements*
Liabilitas lain-lain	187.281.519	-	135.947.309	-	11.522.906	39.811.304	-	*Other liabilities*
	27.846.734.661	**6.860.529.748**	**9.542.159.667**	**5.074.685.797**	**3.738.651.302**	**2.630.708.147**	**-**	

	31 Desember/ *December 31*, 2023							
	Jumlah/ *Total*	Tidak mempunyai kontrak jatuh tempo/ Dibayarkan sesuai permintaan/ *No contractual maturity/ Repayable on demand*	≤ 1 bulan/ *≤ 1 month*	> 1 bulan-3 bulan/ *> 1 month 3 months*	> 3 bulan-1 tahun/ *> 3 months 1 year*	> 1 - 5 tahun/ *> 1 - 5 years*	Lebih dari 5 tahun/ *More than 5 years*	
Liabilitas								***Liabilities***
Simpanan nasabah	22.688.095.000	5.366.287.229	8.801.219.060	4.427.579.482	3.703.009.229	390.000.000	-	*Deposits from customers*
Simpanan dari bank lain	1.105.227.338	261.365.349	816.024.281	24.768.125	3.069.583	-	-	*Deposits from other banks*
Efek-efek yang diterbitkan	1.717.750.004	-	-	-	52.750.000	1.665.000.004	-	*Securities issued*
Efek-efek yang dijual dengan janji dibeli kembali	644.675.834	-	644.675.834	-	-	-	-	*Securities sold under repurchase agreements*
Liabilitas lain-lain	160.229.698	-	102.398.239	-	10.521.933	47.309.526	-	*Other liabilities*
	26.315.977.874	**5.627.652.578**	**10.364.317.414**	**4.452.347.607**	**3.769.350.745**	**2.102.309.530**	**-**	

Tabel berikut ini menyajikan informasi mengenai perkiraan *cash outflow* dari rekening administratif pada tanggal 31 Desember 2024 dan 2023:

The tables below provide information about estimated cash outflow of off-balance sheet as of December 31, 2024 and 2023:

	31 Desember/ *December 31*, 2024							
	Jumlah/ *Total*	Tidak mempunyai kontrak jatuh tempo/ Dibayarkan sesuai permintaan/ *No contractual maturity/ Repayable on demand*	Kurang dari/ *Less than* 1 bulan/*month*	1 – 3 bulan/ *months*	3 – 12 bulan/ *months*	1 – 5 tahun/ *years*	Lebih dari 5 tahun/ *More than 5 years*	
Fasilitas pinjaman yang belum digunakan	4.661.563.665	-	556.842.142	443.155.032	2.804.239.680	707.264.178	150.062.633	*Unused loan facilities*
Letter of credit	169.275.405	-	4.522.695	161.189.201	1.040.130	2.523.379	-	*Letter of credits*
Garansi yang diterbitkan	522.142.989	-	99.175.000	189.020	40.364.621	107.548.268	274.866.080	*Guarantees issued*
Jumlah	**5.352.982.059**	**-**	**660.539.837**	**604.533.253**	**2.845.644.431**	**817.335.825**	**424.928.713**	***Total***

44. MANAJEMEN RISIKO (lanjutan)

Risiko likuiditas (lanjutan)

Tabel berikut ini menyajikan informasi mengenai perkiraan *cash outflow* dari rekening administratif pada tanggal 31 Desember 2024 dan 2023: (lanjutan)

44. RISK MANAGEMENT (continued)

Liquidity risk (continued)

The tables below provide information about estimated cash outflow of off-balance sheet as of December 31, 2024 and 2023: (continued)

	31 Desember/ *December 31,* 2023							
	Jumlah/ *Total*	Tidak mempunyai kontrak jatuh tempo/ Dibayarkan sesuai permintaan/ *No contractual maturity/ Repayable on demand*	Kurang dari/ *Less than* 1 bulan/*month*	1 – 3 bulan/ *months*	3 – 12 bulan/ *months*	1 – 5 tahun/ *years*	Lebih dari 5 tahun/ *More than 5 years*	
Fasilitas pinjaman yang belum digunakan	4.033.693.802	-	644.368.921	339.019.681	3.041.353.700	8.951.500	-	*Unused loan facilities*
Letter of credit	18.705.728	-	-	-	-	18.705.728	-	*Letter of credits*
Garansi yang diterbitkan	347.627.606	-	40.022.563	25.496.815	281.160.828	947.400	-	*Guarantees issued*
Jumlah	**4.400.027.136**	**-**	**684.391.484**	**364.516.496**	**3.322.514.528**	**28.604.628**	**-**	***Total***

45. NILAI WAJAR INSTRUMEN KEUANGAN

Aset dan liabilitas keuangan yang diukur pada nilai wajar menggunakan hierarki nilai wajar sebagai berikut:

i. Tingkat 1: input yang berasal dari harga kuotasian (tanpa penyesuaian) di pasar aktif untuk instrumen yang identik yang dapat diakses Bank pada tanggal pengukuran.

ii. Tingkat 2: input selain harga kuotasian yang termasuk dalam level 1 yang dapat diobservasi, baik secara langsung atau tidak langsung. Dalam kategori ini termasuk instrumen yang dinilai dengan menggunakan: harga kuotasian untuk instrumen yang serupa di pasar aktif; harga kuotasian untuk instrumen yang identik atau yang serupa di pasar yang tidak aktif; atau teknik penilaian lainnya dimana seluruh input signifikan dapat diobservasi secara langsung maupun tidak langsung dari data pasar.

iii. Tingkat 3: input yang tidak dapat diobservasi. Dalam kategori ini termasuk semua instrumen dimana teknik penilaian menggunakan input yang tidak dapat diobservasi dan input yang tidak dapat diobservasi ini memberikan dampak signifikan terhadap penilaian instrumen. Termasuk dalam kategori ini adalah instrumen yang dinilai berdasarkan harga kuotasian untuk instrumen serupa yang memerlukan penyesuaian atau asumsi signifikan yang tidak dapat diobservasi untuk mencerminkan perbedaan diantara instrumen tersebut.

45. FAIR VALUE OF FINANCIAL INSTRUMENTS

The financial assets and liabilities measured at fair value use the following fair value hierarchy:

i. Level 1: inputs that are quoted prices (unadjusted) in active markets for identical instruments that the Bank can access at the measurement date.

ii. Level 2: inputs other than quoted prices included within level 1 that are observable either directly or indirectly. This category includes instruments valued using: quoted market prices in active markets for similar instruments; quoted market prices in active markets for similar instruments; quoted prices for identical or similar instruments in markets that are not active; or other valuation techniques in which all significant inputs are directly or indirectly observable from market data.

iii. Level 3: inputs that are unobservable. This category includes all instruments for which the valuation technique includes inputs not based on observable data and the unobservable inputs have a significant effect on the instrument's valuation. This category includes instruments that are valued based on quoted prices for similar instruments for which significant unobservable adjustments or assumptions are required to reflect differences between the instruments.

45. NILAI WAJAR INSTRUMEN KEUANGAN (lanjutan)

Tabel berikut menyajikan instrumen keuangan Bank yang diukur sebesar nilai wajar:

45. FAIR VALUE OF FINANCIAL INSTRUMENTS (continued)

The following table presents the Bank's financial instruments that are measured at fair value:

	31 Desember/ *December 31,* 2024				
	Tingkat 1/ *Level 1*	**Tingkat 2/ *Level 2***	**Tingkat 3/ *Level 3***	**Jumlah/ *Total***	
Aset keuangan					***Financial assets***
Efek-efek	1.961.146.285	836.818.168	-	2.797.964.453	*Marketable securities*
Penyertaan saham	-	-	0*)	0*)	*Investment in shares*
Jumlah	**1.961.146.285**	**836.818.168**	**-**	**2.797.964.453**	***Total***

	31 Desember/ *December 31,* 2023				
	Tingkat 1/ *Level 1*	**Tingkat 2/ *Level 2***	**Tingkat 3/ *Level 3***	**Jumlah/ *Total***	
Aset keuangan					***Financial assets***
Efek-efek	1.328.291.579	1.097.502.547	-	2.425.794.126	*Marketable securities*
Penyertaan saham	-	-	0*)	0*)	*Investment in shares*
Jumlah	**1.328.291.579**	**1.097.502.547**	**-**	**2.425.794.126**	***Total***

*) nilai wajar saham PT Bima Multi Finance adalah sebesar Rp1 (dalam nilai penuh)

) fair value of shares in PT Bima Multi Finance are Rp1 (in full amount)

Tidak terdapat perpindahan antara tingkat 1 dan tingkat 2 hierarki nilai wajar.

There is no transfer between level 1 and level 2 of fair value hierarchy.

Tabel berikut ini menyajikan perubahan pada instrumen keuangan Bank yang diukur dengan tingkat 3 - hierarki nilai wajar untuk tahun yang berakhir pada 31 Desember 2024 dan 2023.

The following table presents the changes in Bank's financial instruments measured at level 3 - fair value hierarchy for the year ended December 31, 2024 and 2023.

	31 Desember/*December 31,* 2024				
	Saldo awal/ *Beginning balance*	**Penambahan/ *Additions***	**Kerugian yang diakui pada laba rugi/ *Loss recognised in profit or loss***	**Jumlah/ *Total***	
Aset keuangan					***Financial assets***
Penyertaan saham	0*)	-	-	0*)	*Investment in shares*

	31 Desember/*December 31,* 2023				
	Saldo awal/ *Beginning balance*	**Penambahan/ *Additions***	**Kerugian yang diakui pada laba rugi/ *Loss recognised in profit or loss***	**Jumlah/ *Total***	
Aset keuangan					***Financial assets***
Penyertaan saham	31.877.279	-	(31.877.279)	0*)	*Investment in shares*

*) nilai wajar saham PT Bima Multi Finance adalah sebesar Rp1 (dalam nilai penuh)

) fair value of shares in PT Bima Multi Finance are Rp1 (in full amount)

45. NILAI WAJAR INSTRUMEN KEUANGAN (lanjutan)

Pada tanggal 31 Desember 2023, Bank melakukan penilaian kembali atas nilai pasar 100% Ekuitas PT Bima Multi Finance. Berdasarkan laporan dari penilai Independen KJPP Tri, Santi dan Rekan yang ditandatangani oleh Santi Dewiyani, MAPPI (Cert.) pada tanggal 8 Desember 2023. Nilai wajar dari penyertaan saham sementara ditentukan menggunakan laporan keuangan per 30 September 2023 dengan pendekatan aset metode *Adjusted Book Value* (ABV) dan asumsi tingkat diskon likuiditas pasar sebesar 30%.

Tabel di bawah ini menyajikan perbandingan antara nilai tercatat dan nilai wajar dari aset dan liabilitas keuangan yang tidak diukur pada nilai wajar. Nilai wajar yang diungkapkan adalah berdasarkan informasi relevan yang tersedia pada tanggal 31 Desember 2024 dan 2023, dan tidak diperbaharui untuk mencerminkan perubahan dalam kondisi pasar yang telah terjadi setelah tanggal ini.

45. FAIR VALUE OF FINANCIAL INSTRUMENTS (continued)

As of December 31, 2023, the Bank reassessed the market value of 100% Equity of PT Bima Multi Finance. Based on Independent Appraisal report from the independent appraiser KJPP Tri, Santi and Associates signed by Santi Dewiyani, MAPPI (Cert.) on December 8, 2023. The fair value of the temporary share investment was determined using the financial statements as of September 30, 2023 with an asset approach using the Adjusted Book Value (ABV) method and assumption the discount for lack of marketability of 30%.

The table below summarises the comparison between the carrying amounts and fair values of all financial assets and liabilities except those measured at fair value. The fair values disclosed are based on relevant information available as of December 31, 2024 and 2023, and are not updated to reflect changes in market conditions which have occurred after these dates.

	31 Desember/*December 31*, 2024		
	Nilai tercatat/ *Carrying value*	**Nilai wajar/ *Fair value***	
Aset Keuangan			***Financial Assets***
Kas	71.600.262	71.600.262	*Cash*
Giro pada Bank Indonesia	1.401.052.981	1.401.052.981	*Current accounts with Bank Indonesia*
Giro pada bank lain	114.473.297	114.473.297	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain - bersih	12.197.255	12.197.255	*Placements with Bank Indonesia and other banks - net*
Efek-efek - bersih	4.664.758.489	4.532.679.804	*Marketable securities - net*
Efek-efek yang dibeli dengan janji dijual kembali - bersih	197.775.620	193.396.220	*Securities purchased under resale agreements*
Pendapatan bunga yang masih akan diterima	314.751.488	314.751.488	*Interest income receivables*
Pinjaman yang diberikan - bersih	20.112.894.444	19.866.083.129	*Loans - net*
Tagihan akseptasi	17.791.739	17.791.739	*Acceptance receivables*
Aset lain-lain	21.740.496	21.740.496	*Other assets*
Jumlah aset keuangan	**26.929.036.071**	**26.545.766.671**	***Total financial assets***
Liabilitas Keuangan			***Financial Liabilities***
Simpanan nasabah	23.332.111.500	23.332.111.500	*Deposits from customers*
Simpanan dari bank lain	591.017.972	591.017.972	*Deposits from other banks*
Efek-efek yang diterbitkan	2.289.412.649	2.316.217.340	*Securities issued*
Efek-efek yang dijual dengan janji dibeli kembali	587.475.014	587.475.014	*Securities sold under repurchase agreement*
Utang akseptasi	17.005.026	17.005.026	*Acceptance payables*
Akrual dan liabilitas lain-lain	187.281.519	187.281.519	*Accruals and other liabilities*
Jumlah liabilitas keuangan	**27.004.303.680**	**27.031.108.371**	***Total financial liabilities***

45. NILAI WAJAR INSTRUMEN KEUANGAN (lanjutan)

45. FAIR VALUE OF FINANCIAL INSTRUMENTS (continued)

	31 Desember/*December 31*, 2023		
	Nilai tercatat/ *Carrying value*	Nilai wajar/ *Fair value*	
Aset Keuangan			***Financial Assets***
Kas	92.820.864	92.820.864	*Cash*
Giro pada Bank Indonesia	1.493.076.850	1.493.076.850	*Current accounts with Bank Indonesia*
Giro pada bank lain	296.297.193	296.297.193	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain - bersih	915.368.748	915.368.748	*Placements with Bank Indonesia and other banks - net*
Efek-efek - bersih	3.851.497.641	3.856.960.471	*Marketable securities - net*
Efek-efek yang dibeli dengan janji dijual kembali - bersih	636.732.554	633.930.554	*Securities purchased under resale agreements*
Pendapatan bunga yang masih akan diterima	368.407.923	368.407.923	*Interest income receivables*
Pinjaman yang diberikan - bersih	18.053.870.975	18.043.073.004	*Loans - net*
Tagihan akseptasi	12.474.839	12.474.839	*Acceptance receivables*
Aset lain-lain	23.076.537	23.076.537	*Other assets*
Jumlah aset keuangan	**25.743.624.124**	**25.735.486.983**	***Total financial assets***
Liabilitas Keuangan			***Financial Liabilities***
Simpanan nasabah	22.429.180.492	22.429.180.492	*Deposits from customers*
Simpanan dari bank lain	1.104.803.359	1.104.803.359	*Deposits from other banks*
Efek-efek yang diterbitkan	1.347.639.528	1.382.811.890	*Securities issued*
Efek-efek yang dijual dengan janji dibeli kembali	643.266.730	643.266.730	*Securities sold under repurchase agreement*
Utang akseptasi	11.959.811	11.959.811	*Acceptance payables*
Akrual dan liabilitas lain-lain	160.229.698	160.229.698	*Accruals and other liabilities*
Jumlah liabilitas keuangan	**25.697.079.618**	**25.732.251.980**	***Total financial liabilities***

Metode dan asumsi yang digunakan untuk estimasi nilai wajar adalah sebagai berikut:

a. Efek-efek

Nilai wajar untuk efek-efek yang diukur pada biaya perolehan diamortisasi ditetapkan berdasarkan harga pasar atau harga kuotasi perantara (*broker*)/pedagang efek (*dealer*) (tingkat 1 - hierarki nilai wajar). Jika informasi ini tidak tersedia, nilai wajar diestimasi dengan menggunakan harga pasar kuotasi efek yang memiliki karakteristik kredit, jatuh tempo dan *yield* yang serupa (tingkat 2 - hierarki nilai wajar).

b. Pinjaman yang diberikan

Pinjaman yang diberikan dinyatakan berdasarkan jumlah nilai tercatat setelah dikurangi oleh beban penurunan nilai. Estimasi nilai wajar dari pinjaman yang diberikan mencerminkan jumlah diskonto dari estimasi kini dari arus kas masa depan yang diharapkan akan diterima. Arus kas yang diharapkan didiskontokan pada tingkat suku bunga pasar terkini untuk menentukan nilai wajar (tingkat 3 - hierarki nilai wajar).

The methods and assumptions used to estimate fair value are as follows:

a. Marketable securities

The fair value for securities measured at amortised cost is based on market prices or broker/dealer price quotations (level 1 - fair value hierarchy). Where this information is not available, fair value is estimated using quoted market prices for securities with similar credit, maturity and yield characteristics (level 2 - fair value hierarchy).

b. Loans

Loans are recorded at carrying amount net of charges for impairment. The estimated fair value of loans represents the discounted amount of estimated future cash flows expected to be received. Estimated cash flows are discounted at current market rates to determine fair value (level 3 - fair value hierarchy).

45. NILAI WAJAR INSTRUMEN KEUANGAN (lanjutan)

Metode dan asumsi yang digunakan untuk estimasi nilai wajar adalah sebagai berikut: (lanjutan)

c. Efek-efek yang diterbitkan

Nilai wajar untuk efek-efek yang diukur pada biaya perolehan diamortisasi ditetapkan berdasarkan harga pasar atau harga kuotasi perantara (*broker*)/pedagang efek (*dealer*) (tingkat 1 - hierarki nilai wajar). Nilai wajar agregat dihitung berdasarkan harga pasar kuotasi. Jika informasi ini tidak tersedia, model diskonto arus kas digunakan berdasarkan kurva *yield* terkini yang sesuai dengan sisa periode jatuh temponya (tingkat 2 - hierarki nilai wajar).

d. Sebagian besar dari instrumen keuangan yang tidak diukur pada nilai wajar, diukur pada biaya perolehan diamortisasi. Berikut daftar instrumen keuangan yang nilai tercatatnya mendekati nilai wajarnya, contohnya, instrumen keuangan jangka pendek atau yang ditinjau ulang menggunakan harga pasar secara berkala.

Aset Keuangan:
- Kas
- Giro pada Bank Indonesia
- Giro pada bank lain
- Penempatan pada Bank Indonesia dan bank lain
- Efek-efek
- Efek-efek yang dibeli dengan janji dijual Kembali
- Pinjaman yang diberikan
- Pendapatan bunga yang masih akan diterima
- Tagihan akseptasi
- Aset lain-lain

Liabilitas Keuangan:
- Simpanan nasabah
- Simpanan dari bank lain
- Efek-efek yang diterbitkan
- Efek-efek yang dijual dengan janji dibeli kembali
- Utang akseptasi
- Akrual dan liabilitas lain-lain

45. FAIR VALUE OF FINANCIAL INSTRUMENTS (continued)

The methods and assumptions used to estimate fair value are as follows: (continued)

c. Securities issued

The fair value for securities issued measured at amortised cost based on market prices or broker/dealer price quotations (level 1 - fair value hierarchy). The aggregate fair values are calculated based on quoted market prices. For those notes where quoted market prices are not available, a discounted cash flow model is used based on a current yield curve appropriate for the remaining term to maturity (level 2 - fair value hierarchy).

d. Majority of the financial instrument not measured at fair value are measured at amortised cost. The following are financial instruments for which their carrying amount are reasonable approximation of fair value because, for example, they are short term in nature or re-price to current market rates frequently.

Financial Assets:
- *Cash*
- *Current accounts with Bank Indonesia*
- *Current accounts with other banks*
- *Placement with Bank Indonesia and other banks*
- *Marketable securities*
- *Securities purchased under resale agreements*
- *Loans*
- *Interest income receivables*
- *Acceptance receivables*
- *Other assets*

Financial Liabilities:
- *Deposits from customers*
- *Deposits from other banks*
- *Securities issued*
- *Securities sold under repurchase agreements*
- *Acceptance payable*
- *Accrued and other liabilities*

46. MANAJEMEN MODAL

Tujuan utama dari kebijakan Bank atas kebijakan pengelolaan modal adalah untuk memastikan bahwa Bank memiliki modal yang kuat untuk mendukung strategi pengembangan ekspansi usaha Bank saat ini dan mempertahankan kelangsungan pengembangan di masa mendatang, dan untuk memenuhi ketentuan kecukupan permodalan yang ditetapkan oleh regulator serta memastikan agar struktur permodalan Bank telah efisien.

Bank menyusun Rencana Permodalan berdasarkan penilaian dari penelaahan atas kebutuhan kecukupan permodalan yang dipersyaratkan dan mengkombinasikannya dengan tinjauan perkembangan ekonomi terkini. Bank senantiasa akan menghubungkan tujuan keuangan dan kecukupan modal terhadap risiko melalui proses perencanaan modal, begitu pula dengan bisnis yang didasarkan pada permodalan dan persyaratan likuiditas Bank.

Kebutuhan permodalan Bank juga direncanakan dan didiskusikan secara rutin yang didukung dengan data analisis.

Rencana Permodalan disusun oleh Direksi sebagai bagian dari Rencana Bisnis Bank dan disetujui oleh Dewan Komisaris. Perencanaan ini diharapkan akan memastikan tersedianya modal yang cukup dan terciptanya struktur permodalan yang optimal untuk mendukung strategi Bank.

Bank telah melakukan perhitungan kecukupan modal berdasarkan ketentuan Bank Indonesia yang berlaku, dimana modal yang dimiliki diklasifikasikan dalam 2 *Tier* yaitu Modal *Tier* I dan Modal *Tier* II.

Bank mematuhi semua persyaratan modal yang ditetapkan oleh pihak eksternal sepanjang periode pelaporan, khususnya berkenaan dengan perhitungan Kewajiban Penyediaan Modal Minimum (KPMM) dan Aktiva Tertimbang Menurut Risiko (ATMR).

46. CAPITAL MANAGEMENT

The primary objectives of the Bank's capital management policy are to ensure that the Bank has a strong capital to support the Bank's business expansion strategy currently to sustain future development of the business, to meet regulator capital adequacy requirements and also to ensure the efficiency of Bank's capital structure.

The Bank undertakes Capital Planning based on assessment and review of the capital situation in terms of the legal capital adequacy requirement, combined with assessment of economic outlooks. The Bank will continue to link financial and capital adequacy goals to risk appetite through the capital planning process as well as assess the businesses based on the Bank's capital and liquidity requirements.

The capital needs of the Bank are also discussed and planned on a routine basis as supported by data analysis.

Capital Planning is prepared by Directors as part of the Bank's Business Plan and is approved by the Board of Commissioners. Capital Planning ensures that adequate levels of capital and an optimum mix of the different components of capital are maintained to support the Bank's strategy.

The Bank calculated its capital adequacy requirements using the prevailing Bank Indonesia regulation, where the regulatory capital is classified into 2 Tiers, mainly Tier I Capital and Tier II Capital.

The Bank has complied with all externally imposed capital requirements throughout the reporting period, particularly regarding Capital Adequacy Ratio (CAR) and calculation of Risk Weighted Assets (RWA).

47. 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.

Giro wajib minimum

Saldo giro pada Bank Indonesia adalah untuk memenuhi persyaratan Giro Wajib Minimum (GWM) dari Bank Indonesia.

Berdasarkan Peraturan Bank Indonesia (PBI) No. 20/3/PBI/2018 tanggal 29 Maret 2018 sebagaimana telah beberapa kali diubah, terakhir dengan PBI No. 24/4/PBI/2022 tanggal 1 Maret 2022 tentang Perubahan Keempat atas Peraturan Bank Indonesia No. 20/3/PBI/2018 tentang Giro Wajib Minimum dalam Rupiah dan Valuta Asing bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah; Peraturan Anggota Dewan Gubernur (PADG) No. 20/10/PADG/2018 tanggal 31 Mei 2018, sebagaimana telah diubah beberapa kali, terakhir dengan PADG No. 24/3/PADG/2022 tanggal 1 Maret 2022 tentang Perubahan Kedelapan atas Peraturan Anggota Gubernur No. 20/10/PADG/2018 tentang Giro Wajib Minimum dalam Rupiah dan Valuta Asing bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah; dan Peraturan Anggota Dewan Gubernur (PADG) No. 24/8/PADG/2022 tanggal 1 Juli 2022, sebagaimana telah diubah beberapa kali, terakhir dengan PADG No. 12 Tahun 2023 tanggal 1 Oktober 2023 tentang Perubahan Kedua atas Peraturan Anggota Dewan Gubernur Nomor 24/8/PADG/2022 tentang Peraturan Pelaksanaan Pemenuhan Giro Wajib Minimum Dalam Rupiah dan Valuta Asing Bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah. Bank wajib memenuhi rasio Giro Wajib Minimum (GWM) seperti yang disyaratkan Bank Indonesia dalam Rupiah dan valuta asing secara harian dan rata-rata dari rata-rata Dana Pihak Ketiga (DPK) dalam Rupiah dan valuta asing selama periode laporan tertentu.

47. ADDITIONAL INFORMATION

The following additional information is information that is not required to be disclosed by Indonesian Financial Accounting Standards. Such additional information was prepared in accordance with regulations of Financial Services Authority.

Minimum statutory requirements

Current accounts with Bank Indonesia are provided to fulfill Bank Indonesia's requirements on Minimum Reserve Requirements (GWM).

In accordance with Bank Indonesia Regulation (PBI) No. 20/3/PBI/2018 dated March 29, 2018 as amended several times, most recently with PBI No. 24/4/PBI/2022 dated March 1, 2022 concerning the Fourth Amendment to Bank Indonesia Regulation No. 20/3/PBI/2018 concerning Statutory Reserves in Rupiah and Foreign Currency for Conventional Commercial Banks, Sharia Commercial Banks and Sharia Business Units; and Regulation of Members of the Board of Governors (PADG) No. 20/10/PADG/2018 dated May 31, 2018, as amended several times, most recently with PADG No. 24/3/PADG/2022 dated March 1, 2022 concerning the Eighth Amendment to the Regulation of Members of the Governor No. 20/10/PADG/2018 concerning Statutory Reserves in Rupiah and Foreign Exchange for Conventional Commercial Banks, Sharia Commercial Banks and Sharia Business Units, Regulation of Members of the Board of Governors (PADG) No. 24/8/PADG/2022 dated July 1, 2022, as amended several times, most recently with PADG No. 12 year 2023 dated October 1, 2023 concerning the Second Amendment to the Regulation of Members of the Board of Governors PADG No. 24/8/PADG/2022 concerning the Implementation Regulations for Fulfillment of Statutory Reserves in Rupiah and Foreign Exchange for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units. Banks are required to meet the Statutory Reserves (GWM) ratio as required by Bank Indonesia in Rupiah and foreign currencies on a daily basis and the average of the average Third Party Funds (TPF) in Rupiah and foreign currencies during a specific reporting period.

47. INFORMASI TAMBAHAN (lanjutan)

Giro wajib minimum (lanjutan)

Pada tanggal 31 Desember 2024 dan 2023, rasio GWM rata-rata dalam Rupiah yang wajib dipenuhi adalah sebesar 9%, dan rasio GWM rata-rata dalam valuta asing yang wajib dipenuhi sebesar 4%.

Bank memperoleh Insentif Kebijakan Likuiditas Makroprudensial (KLM) sebesar 2,8% berlaku dari 1 Desember 2024 sampai dengan 31 Desember 2024 sehingga GWM rata-rata dalam Rupiah yang wajib dipenuhi oleh Bank adalah 6,2%.

Disamping itu, berdasarkan PBI No. 20/4/PBI/2018 tanggal 29 Maret 2018 sebagaimana telah beberapa kali diubah, terakhir dengan PBI No.24/16/PBI/2022 tanggal 1 November 2022 tentang Perubahan Keempat atas Peraturan Bank Indonesia No. 20/4/PBI/2018 tentang Rasio Intermediasi Makroprudensial dan Penyangga Likuiditas Makroprudential bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah dan PADG No.21/22/PADG/2019 tanggal 28 November 2019 sebagaimana telah mengalami beberapa kali perubahan, terakhir dengan PADG No. 18 Tahun 2023 tanggal 29 November 2023 tentang Perubahan Ketujuh atas Peraturan Anggota Dewan Gubernur No. 21/22/PADG/2019 tentang Rasio Intermediasi Makroprudential dan Penyangga Likuiditas Makroprudential bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah, Bank wajib memenuhi Rasio Intermediasi Makroprudential (RIM) dan Penyangga Likuiditas Makroprudential (PLM) dari rata-rata DPK dalam Rupiah selama periode laporan tertentu.

Pada tanggal 31 Desember 2024 dan 2023, rasio PLM yang wajib dipenuhi minimal masing-masing sebesar 5% dan 6%.

Giro RIM adalah tambahan simpanan minimum yang wajib dipelihara oleh Bank dalam bentuk saldo rekening giro pada Bank Indonesia. Parameter yang digunakan dalam pemenuhan giro RIM adalah sebagai berikut:
1. Batas bawah target RIM sebesar 84%
2. Batas atas target RIM sebesar 94%
3. KPMM Insentif sebesar 14%

Bank memiliki RIM diatas batas bawah target RIM, NPL kurang dari 5 (Catatan 11), dan KPMM diatas 19% sehingga Bank wajib memelihara Giro RIM menggunakan parameter disinsentif yang berlaku. Pada tanggal 31 Desember 2024 dan 2023, Giro RIM yang dimiliki Bank telah memenuhi ketentuan Bank Indonesia.

47. ADDITIONAL INFORMATION (continued)

Minimum statutory requirements (continued)

As of December 31, 2024 and 2023, the average GWM ratio in Rupiah that must be fulfilled is at 9%, and the average GWM ratio in foreign currencies that must be fulfilled is at 4%.

Bank received a Macroprudential Liquidity Policy Incentive of 2.8% valid from December 1, 2024 until December 31, 2024 therefore GWM ratio in Rupiah that must be fulfilled by the Bank is at 6.2%.

Furthermore, based on PBI No. 20/4/PBI/2018 dated March 29, 2018 as amended several times, most recently with PBI No.24/16/PBI/2022 dated November 1, 2022 concerning the Fourth Amendment to Bank Indonesia Regulation No. 20/4/PBI/2018 concerning Ratio Macroprudential Intermediation and Macroprudential Liquidity Support for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units; and PADG No.21/22/PADG/2019 dated November 28, 2019 as amended several times, most recently with PADG No. 18 year 2023 dated November 29, 2023 concerning the Seventh Amendment to the Regulation of Members of the Board of Governors No. 21/22/PADG/2019 concerning Macroprudential Intermediation Ratio and Macroprudential Liquidity Buffer for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units, Banks must meet the Macroprudential Intermediation Ratio (RIM) and Macroprudential Liquidity Buffer (PLM) of the average TPF in Rupiah during specific reporting periods.

As of December 31, 2024 and 2023, the minimum of PLM ratio that must be fulfilled is set at 5% and 6%, respectively.

RIM demand deposits is the additional reserve that should be maintained by the Bank in the form of current accounts with Bank Indonesia. The parameters used in the fulfillment of MIR are as follow:
1. *Minimum target of RIM is 84%*
2. *Maximum target of RIM is 94%*
3. *Incentive of CAR is 14%*

Bank have RIM above the lower RIM target limit, NPL of less than 5 (Note 11), and have CAR above 19% therefore the Bank is required to maintain RIM demand deposits using the applicable disincentive parameters. As of December 31, 2024 and 2023, the RIM Current Account owned by the Bank has complied with the applicable Bank Indonesia regulations.

47. INFORMASI TAMBAHAN (lanjutan) / *47. ADDITIONAL INFORMATION (continued)*

Giro wajib minimum (lanjutan) / *Minimum statutory requirements (continued)*

Bank telah memenuhi peraturan Bank Indonesia yang berlaku tentang Giro Wajib Minimum bank umum konvensional pada tanggal 31 Desember 2024 dan 2023.

The Bank has fulfilled the prevailing Bank Indonesia's regulation regarding Minimum Reserve Requirements for conventional banks as of December 31, 2024 and 2023.

Rasio GWM Bank pada tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut:

As of December 31, 2024 and 2023, the GWM ratios of the Bank are as follows:

	31 Desember/*December 31*,		
	2024	2023	
Rupiah			*Rupiah*
Giro Wajib Minimum*)	6,67%	7,32%	*Minimum Statutory Reserve*)
Penyangga Likuiditas Makroprudensial**)	21,78%	23,73%	*Macroprudential Liquidity Buffer***)
GWM Rasio Intermediasi Makroprudensial***)	4,76%	(1,01%)	*GWM Macroprudential Intermediation Ratio****)
Valuta Asing	4,05%	4,05%	*Foreign Currencies*

*) Sebelumnya Giro Wajib Minimum Primer / *Previously Primary Minimum Statutory Reserve*
**) Sebelumnya Giro Wajib Minimum Sekunder / *Previously Secondary Minimum Statutory Reserve*
***) Sebelumnya Giro Wajib Minimum LFR / *Previously Loan to Funding Ratio Minimum Statutory Reserve*

Kewajiban Penyediaan Modal Minimum / *Minimum Capital Requirement*

Pada tanggal 31 Desember 2024 dan 2023, rasio Kewajiban Penyediaan Modal Minimum ("KPMM") Bank dihitung berdasarkan Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2016 sebagaimana terakhir dirubah melalui No. 27/POJK.03/2022 tentang Kewajiban Penyediaan Modal Minimum Bank Umum dengan memperhitungkan risiko kredit, risiko operasional dan risiko pasar. Rasio KPMM tersebut adalah sebagai berikut:

On December 31, 2024 and 2023, the Bank's Minimum Capital Requirement ("KPMM") ratio is calculated based on Financial Services Authority Regulation No. 11/POJK.03/2016 as last amended by No. 27/POJK.03/2022 concerning the Minimum Capital Requirement for Commercial Banks. The Bank's capital adequacy ratio with consideration for credit, operational and market risks. The KPMM ratio is as follows:

	31 Desember/*December 31*,		
	2024	2023	
Modal inti (*Tier* I)	3.584.008.030	3.287.238.228	*Core Capital (Tier I)*
Modal pelengkap (*Tier* II)	833.932.677	532.853.302	*Supplementary Capital (Tier II)*
Jumlah Modal	**4.417.940.707**	**3.820.091.530**	***Total Capital***
Aset Tertimbang Menurut Risiko untuk Risiko Kredit	18.182.056.435	16.999.048.864	*Risk Weighted Assets for Credit Risk*
Aset Tertimbang Menurut Risiko untuk Risiko Operasional	1.555.657.932	1.466.732.341	*Risk Weighted Assets for Operational Risk*
Aset Tertimbang Menurut Risiko untuk Risiko Pasar	785.592.132	685.118.902	*Risk Weighted Assets for Market Risk*
Rasio Kewajiban Penyediaan Modal Minimum untuk risiko kredit dan risiko operasional	22,38%	20,69%	*Capital Adequacy Ratio (CAR) with credit and operational risks*
Rasio Kewajiban Penyediaan Modal Minimum untuk risiko kredit, risiko operasional dan risiko pasar	21,53%	19,95%	*Capital Adequacy Ratio (CAR) with credit, operational and market risks*
Rasio Kewajiban Penyediaan Modal Minimum yang diwajibkan	9,00%	8,00%	*Minimum Capital Adequacy Ratio required*

47. INFORMASI TAMBAHAN (lanjutan) / *47. ADDITIONAL INFORMATION (continued)*

Aset berdasarkan kolektibilitas / *Assets by collectibility*

Kolektibilitas aset sesuai dengan Peraturan Otoritas Jasa Keuangan ("POJK") No. 40/POJK.03/2019 tanggal 1 Januari 2020 tentang Penilaian Kualitas Aset Bank Umum adalah sebagai berikut:

Assets collectibility in accordance with Regulation of the Financial Services Authority ("POJK") No. 40/POJK.03/2019 dated January 1, 2020 regarding "Asset Quality Ratings for Conventional Bank" are as follows:

	31 Desember/*December 31*, 2024						
	Lancar/*Current*	Dalam perhatian khusus/ *Special mention*	Kurang lancar/ *Substandard*	Diragukan/ *Doubtful*	Macet/*Loss*	Jumlah/*Total*	
Giro dan penempatan pada Bank Indonesia	1.413.252.981	-	-	-	-	1.413.252.981	*Current accounts and placements with Bank Indonesia*
Giro pada bank lain	114.518.280	-	-	-	-	114.518.280	*Current accounts with other banks*
Efek-efek	7.463.989.140	-	-	-	-	7.463.989.140	*Marketable securities*
Efek-efek yang dibeli dengan janji dijual kembali	197.775.620	-	-	-	-	197.775.620	*Securities purchased under resale agreements*
Pinjaman yang diberikan	19.197.768.646	688.873.837	62.185.617	5.102.838	605.929.383	20.559.860.321	*Loans*
Penyertaan saham	219.933.809	-	-	-	-	219.933.809	*Investment in shares*
Akseptasi	17.791.739	-	-	-	-	17.791.739	*Acceptance*
Tagihan derivatif	795.408	-	-	-	-	795.408	*Derivative receivables*
Agunan yang diambil alih	-	450.876.841	93.238.445	-	-	544.115.286	*Foreclosed assets*
Aset lain-lain*)	1.714.304	-	30.924.960	223.984	1.106.292	33.969.540	*Other assets*)*
Jumlah	28.627.539.927	1.139.750.678	186.349.022	5.326.822	607.035.675	30.566.002.124	*Total*
Penyisihan kerugian	(147.415.316)	(220.163.159)	(79.950.907)	(1.387.349)	(164.494.165)	(613.410.896)	*Allowance for impairment losses*
Jumlah - bersih	**28.480.124.611**	**919.587.519**	**106.398.115**	**3.939.473**	**442.541.510**	**29.952.591.228**	***Total - net***

	31 Desember/*December 31*, 2023						
	Lancar/*Current*	Dalam perhatian khusus/ *Special mention*	Kurang lancar/ *Substandard*	Diragukan/ *Doubtful*	Macet/*Loss*	Jumlah/*Total*	
Giro dan penempatan pada Bank Indonesia	2.409.444.380	-	-	-	-	2.409.444.380	*Current accounts and placements with Bank Indonesia*
Giro pada bank lain	296.298.919	-	-	-	-	296.298.919	*Current accounts with other banks*
Efek-efek	6.285.563.736	-	-	-	-	6.285.563.736	*Marketable securities*
Efek-efek yang dibeli dengan janji dijual kembali	636.732.554	-	-	-	-	636.732.554	*Securities purchased under resale agreements*
Pinjaman yang diberikan	16.853.533.089	1.031.746.709	92.773.486	17.419.566	633.270.327	18.628.743.177	*Loans*
Penyertaan saham	215.930.505	-	-	-	-	215.930.505	*Investment in shares*
Akseptasi	12.474.839	-	-	-	-	12.474.839	*Acceptance*
Tagihan derivatif	202.833	-	-	-	-	202.833	*Derivative receivables*
Agunan yang diambil alih	-	744.615.050	57.871.632	-	-	802.486.682	*Foreclosed assets*
Aset lain-lain*)	17.836.486	-	17.888.691	223.984	1.340.800	37.289.961	*Other assets*)*
Jumlah	26.728.017.341	1.776.361.759	168.533.809	17.643.550	634.611.127	29.325.167.586	*Total*
Penyisihan kerugian	(197.960.074)	(455.708.924)	(87.152.385)	(4.528.633)	(90.665.152)	(836.015.168)	*Allowance for impairment losses*
Jumlah - bersih	**26.530.057.267**	**1.320.652.835**	**81.381.424**	**13.114.917**	**543.945.975**	**28.489.152.418**	***Total - net***

*) Aset lain-lain terdiri atas properti terbengkalai dan *suspense account*.

**) Other assets consist of abandoned property and suspense account.*

Rekening administratif berdasarkan kolektibilitas / *Administrative account by collectibility*

Kolektibilitas rekening administratif sesuai dengan Peraturan Otoritas Jasa Keuangan ("POJK") No. 40/POJK.03/2019 tanggal 1 Januari 2020 tentang Penilaian Kualitas Aset Bank Umum adalah sebagai berikut:

Administrative account collectibility in accordance with Regulation of the Financial Services Authority ("POJK") No. 40/POJK.03/2019 dated January 1, 2020 regarding "Asset Quality Ratings for Conventional Bank" are as follows:

	31 Desember/*December 31*, 2024						
	Lancar/*Current*	DPK/ *Special mention*	Kurang lancar/ *Substandard*	Diragukan/ *Doubtful*	Macet/*Loss*	Jumlah/*Total*	
Bank garansi	522.142.989	-	-	-	-	522.142.989	*Bank guarantee*
Letter of credit	169.275.405	-	-	-	-	169.275.405	*Letter of credit*
Dikurangi: Penyisihan kerugian	(1.270.842)	-	-	-	-	(1.270.842)	*Less: Allowance for impairment losses*
Jumlah - bersih	**690.147.552**	-	-	-	-	**690.147.552**	***Total - net***

	31 Desember/*December 31*, 2023						
	Lancar/*Current*	DPK/ *Special mention*	Kurang lancar/ *Substandard*	Diragukan/ *Doubtful*	Macet/*Loss*	Jumlah/*Total*	
Bank garansi	982.802.950	-	-	-	-	982.802.950	*Bank guarantee*
Letter of credit	60.563.964	-	-	-	-	60.563.964	*Letter of credit*
Dikurangi: Penyisihan kerugian	(547.808)	-	-	-	-	(547.808)	*Less: Allowance for impairment losses*
Jumlah - bersih	**1.042.819.106**	-	-	-	-	**1.042.819.106**	***Total - net***

47. INFORMASI TAMBAHAN (lanjutan) / *47. ADDITIONAL INFORMATION (continued)*

Berdasarkan pihak dan sektor ekonomi / ***By counterparties and economic sector***

	31 Desember/*December 31*,		
	2024	**2023**	
Pihak Berelasi			***Related Parties***
Industri	78.612.786	91.679.382	*Industry*
Perdagangan, restoran dan hotel	23.722.610	20.052.215	*Trading, restaurant, and hotel*
Lembaga pembiayaan	940.667	28.697.953	*Financing*
Jasa-jasa sosial/masyarakat	-	12.568	*Social community service*
Lain-lain	20.191.048	3.454.323	*Others*
Sub jumlah	123.467.111	143.896.441	*Sub total*
Pihak Ketiga			***Third Parties***
Lembaga pembiayaan	5.576.744.319	5.534.314.148	*Financing*
Perdagangan, restoran, dan hotel	4.068.926.696	3.554.187.395	*Trading, restaurant, and hotel*
Industri	2.936.443.715	2.094.677.859	*Industry*
Real estate	2.476.932.930	2.533.798.811	*Real estate*
Konstruksi	1.100.319.988	737.806.956	*Construction*
Jasa-jasa sosial/masyarakat	417.106.763	349.338.531	*Social community service*
Lain-lain	3.859.918.799	3.680.723.036	*Others*
Sub jumlah	20.436.393.210	18.484.846.736	*Sub total*
Jumlah	**20.559.860.321**	**18.628.743.177**	***Total***
Dikurangi: Cadangan kerugian penurunan nilai	(446.965.878)	(574.872.202)	*Less: Allowance for impairment losses*
Jumlah - bersih	**20.112.894.443**	**18.053.870.975**	***Total - net***

Pada tanggal 31 Desember 2024 dan 2023, rasio pinjaman kepada Usaha Mikro kecil terhadap pinjaman yang diberikan sesuai dengan Surat Edaran Bank Indonesia No.13/30/DPNP tanggal 16 Desember 2011 masing-masing sebesar 15,43% dan 16,39% (tidak diaudit).

As of December 31, 2024 and 2023, the ratio of Micro Business loans to the total loans in accordance with Bank Indonesia Circular Letter No.13/30/DPNP dated December 16, 2011, was 15.43% and 16.39%, respectively (unaudited).

Pinjaman yang direstrukturisasi / ***Restructured loans***

	31 Desember/*December 31*,		
	2024	**2023**	
Penjadwalan kembali angsuran dan perpanjangan jangka waktu pinjaman	2.206.449.707	2.868.304.020	*Rescheduling of installments and the extention of credit period*
Dikurangi: Cadangan kerugian penurunan nilai	(342.681.080)	(447.527.201)	*Less: Allowance for impairment losses*
Jumlah - bersih	**1.863.768.627**	**2.420.776.819**	***Total - net***

47. INFORMASI TAMBAHAN (lanjutan) / *47. ADDITIONAL INFORMATION (continued)*

Pinjaman yang direstrukturisasi (lanjutan) / *Restructured loans (continued)*

Berikut adalah jumlah pinjaman yang direstrukturisasi berdasarkan kolektibilitas pada tanggal 31 Desember 2024 dan 2023:

Below are the balance of restructured loans based on collectability as of December 31, 2024 and 2023:

	31 Desember/*December 31*,		
	2024	**2023**	
Lancar	1.026.325.805	1.276.007.551	*Current*
Dalam Perhatian Khusus	594.208.247	930.550.887	*Special Mention*
Kurang Lancar	57.185.617	33.788.024	*Substandard*
Diragukan	500.604	13.919.566	*Doubtful*
Macet	528.229.434	614.037.992	*Loss*
Jumlah pinjaman yang direstrukturisasi	2.206.449.707	2.868.304.020	*Total restructured loans*
Dikurangi: Cadangan kerugian penurunan nilai	(342.681.080)	(447.527.201)	*Less: Allowance for impairment losses*
Jumlah - bersih	**1.863.768.627**	**2.420.776.819**	***Total - net***

Berikut adalah jumlah pinjaman yang direstrukturisasi berdasarkan jenis pinjaman pada tanggal 31 Desember 2024 dan 2023:

Below are the balance of restructured loans based on type as of December 31, 2024 and 2023:

	31 Desember/*December 31*,		
	2024	**2023**	
Pinjaman tetap	1.271.995.717	1.820.536.969	*Fixed loans*
Pinjaman tetap dengan angsuran	780.017.869	849.748.361	*Fixed loans with installments*
Pinjaman rekening koran	118.862.862	146.129.251	*Overdraft loans*
Pinjaman konsumen	22.005.152	32.995.695	*Consumer loans*
Pinjaman serba guna	13.568.107	18.893.744	*Multi purpose loans*
Jumlah pinjaman yang direstrukturisasi	2.206.449.707	2.868.304.020	*Total restructured loans*
Dikurangi: Cadangan kerugian penurunan nilai	(342.681.080)	(447.527.201)	*Less: Allowance for impairment losses*
Jumlah - bersih	**1.863.768.627**	**2.420.776.819**	***Total - net***

47. INFORMASI TAMBAHAN (lanjutan) / *47. ADDITIONAL INFORMATION (continued)*

Pinjaman yang direstrukturisasi (lanjutan) / *Restructured loans (continued)*

Sehubungan dengan restrukturisasi dan relaksasi kredit sebagai dampak dari COVID-19, regulator mengeluarkan POJK No.11/POJK.03/2020 tanggal 16 Maret 2020 tentang Stimulus Perekonomian Nasional sebagai Kebijakan *Countercyclical* Dampak Penyebaran COVID-19 yang kemudian diperbaharui dengan POJK No.48/POJK.03/2020 tanggal 1 Desember 2020 dan diperbaharui dengan POJK No.17/POJK.03/2021 tanggal 10 September 2021. Jumlah pinjaman yang diberikan yang telah direstrukturisasi akibat dampak pandemi COVID-19 pada tanggal 31 Desember 2024 dan 2023 masing-masing sebesar Rp1.104.763.375 dan Rp1.416.009.064.

In relation to loan restructuring and relaxation due to COVID-19 impact, the regulator issued POJK No.11/POJK.03/2020 dated March 16, 2020 regarding National Economy Stimulus as the COVID-19 Outbreak Impact Countercyclical Policy that amended to POJK No. 48/POJK.03/2020 dated December 1, 2020 and reamend under POJK No.17/POJK.03/2021 dated on September 10, 2021. The amount of loan that have been restructured as a result of the COVID-19 pandemic as of December 31, 2024 and 2023 amounting to Rp1,104,763,375 and Rp1,416,009,064, respectively.

Skema restrukturisasi yang disepakati oleh Bank dan debitur meliputi antara lain penjadwalan ulang pembayaran pokok kredit dan bunga, penurunan suku bunga, novasi dan lain-lain.

Restructured loans scheme agreed by the Bank and its debtors include loans principal and interest rescheduling, reduction of interest rates, novation and others.

Pinjaman yang diberikan yang mengalami penurunan nilai dan cadangan kerugian penurunan nilainya berdasarkan sektor ekonomi / *Impaired loans receivables and allowances for impairment losses by economic sector*

Pinjaman yang mengalami penurunan nilai berdasarkan sektor ekonomi dan cadangan yang dibentuk:

Impaired loan based on economic sector and allowance:

	31 Desember/*December 31*,		
	2024	**2023**	
Real estate	542.943.876	664.731.842	*Real estate*
Perdagangan, restoran, dan hotel	268.365.343	240.812.559	*Trading, restaurant, and hotel*
Industri	151.949.080	121.490.813	*Industry*
Konstruksi	102.984.849	117.355.295	*Construction*
Jasa-jasa sosial/masyarakat	59.584.544	35.037.672	*Social/community services*
Lembaga Pembiayaan	-	3.079.485	*Financing*
Lain-lain	252.080.946	419.454.946	*Others*
	1.377.908.639	1.601.962.612	
Dikurangi:			*Less:*
Cadangan kerugian penurunan nilai	(360.437.669)	(362.634.000)	*Allowance for impairment losses*
Jumlah - bersih	**1.017.470.969**	**1.239.328.612**	***Total - net***

Rasio *Non-Performing Loan* / *Non-Performing Loan Ratio*

Rasio pinjaman bermasalah (*Non-Performing Loan - NPL*) kotor Bank terhadap total pinjaman yang diberikan pada tanggal 31 Desember 2024 dan 2023 masing-masing sebesar 3,27% dan 3,99%. Rasio NPL neto Bank terhadap total pinjaman yang diberikan pada tanggal 31 Desember 2024 dan 2023 masing-masing sebesar 2,36% dan 3,24%.

The ratio of non-performing loan (NPL)-gross of the Bank as of December 31, 2024 and 2023 was 3.27% and 3.99% to total loans, respectively. Ratio NPL-net to total loans of the Bank as of December 31, 2024 and 2023 was 2.36% and 3.24%, respectively.

47. INFORMASI TAMBAHAN (lanjutan)

Risiko pasar

LFR *(Loan to Funding Ratio)* Bank pada tanggal 31 Desember 2024 dan 2023 masing-masing adalah sebesar 86,27% dan 81,93%.

Risiko mata uang

Bank memiliki eksposur risiko mata uang akibat adanya transaksi dalam valuta asing. Bank memonitor risiko konsentrasi yang terjadi untuk setiap valuta sehubungan dengan penjabaran transaksi dalam valuta asing ke dalam aset dan liabilitas moneter dalam Rupiah.

Pengelolaan posisi valuta asing Bank dilakukan dengan cara mengendalikan Posisi Devisa Neto ("PDN") Bank secara keseluruhan.

47. ADDITIONAL INFORMATION (continued)

Market risk

The Loan to Funding Ratio (LFR) of the Bank as of December 31, 2024 and 2023 are 86.27% and 81.93%, respectively

Currency risk

The Bank is exposed to currency risk through transaction in foreign currencies. The Bank monitors any concentration risk in relation to any individual currency in regard to the translation of foreign currency transactions into monetary assets and liabilities in Rupiah.

The Bank's foreign currency position management is conducted by managing the Bank's overall Net Open Position ("NOP").

	31 Desember/*December 31,* 2024			
Valuta	**Aset/ *Assets***	**Liabilitas/ *Liabilities***	**Posisi Devisa Neto (nilai absolut)/ *Net Open Position (absolute amount)***	***Currencies***
Keseluruhan (laporan posisi keuangan dan rekening administratif)				*Aggregate (statements of financial position and administrative accounts)*
Dolar Amerika Serikat	1.028.316.050	1.035.903.208	7.587.158	*United States Dollar*
Yuan China	326.132.294	(325.277.579)	854.715	*Chinese Yuan*
Yen Jepang	3.667.468	(3.652.877)	14.591	*Japanese Yen*
Euro Eropa	991.443	(1.623.030)	631.587	*European Euro*
Dolar Singapura	697.256	(721.197)	23.941	*Singapore Dollar*
Swiss Franc	89.610	-	89.610	*Swiss Franc*
Dolar Kanada	59.929	-	59.929	*Canadian Dollar*
Dolar New Zealand	57.944	-	57.944	*New Zealand Dollar*
Dolar Australia	54.073	-	54.073	*Australian Dollar*
Poundsterling Inggis	37.303	-	37.303	*Great Britain Poundsterling*
Baht Thailand	3.758	-	3.758	*Thailand Baht*
Dolar Taiwan	2.602	-	2.602	*New Taiwan Dollar*
Won Korea	1.638	-	1.638	*Korean Won*
Ringgit Malaysia	1.079	-	1.079	*Malaysian Ringgit*
Dolar Hongkong	187	-	187	*Hongkong Dollar*
Total			9.420.115	***Total***
Jumlah ekuitas			4.417.349.503	*Total equity*
Rasio PDN			**0,21%**	***NOP Ratio***

47. INFORMASI TAMBAHAN (lanjutan)

Risiko operasional

Risiko operasional adalah risiko kerugian yang langsung ataupun tidak langsung yang terjadi karena tidak memadainya atau karena adanya kegagalan proses internal, kesalahan manusia, kegagalan sistem, dan/atau adanya kejadian-kejadian eksternal yang mempengaruhi operasional Bank.

Risiko ini melekat dalam semua proses bisnis, kegiatan operasional, sistem dan produk Bank, dari mulai Kantor Pusat sampai Kantor Kas. Kegagalan mengelola risiko operasional dapat menyebabkan kerugian keuangan, keselamatan karyawan dan reputasi Bank hingga akhirnya mempengaruhi kecukupan modal Bank. Tujuan Bank dalam mengelola risiko operasional adalah meminimalisasi dampak kegagalan atau ketidakcukupan proses internal, faktor manusia, sistem atau kejadian-kejadian eksternal yang dapat mempunyai dampak kerugian.

Bank menerapkan manajemen risiko operasional dengan sasaran memastikan bahwa Bank telah melakukan proses manajemen risiko yang meliputi identifikasi, penilaian, pengkajian, mitigasi risiko serta dilakukan pengawasan dan pelaporan atas pelaksanaannya. Hal tersebut dilakukan dengan tujuan akhir memaksimalkan *benefit* dari suatu produk/layanan atau proses transaksi/aktivitas dengan potensi atas risiko operasional yang telah diperhitungkan.

Proses pengkajian risiko dilakukan untuk menilai kecukupan pengendalian internal serta proses identifikasi dan penelaahan risiko untuk setiap proses dan produk di masing-masing unit kerja untuk memastikan kepatuhan terhadap kebijakan, peraturan dan batasan-batasan yang dibuat oleh manajemen Bank. Pengelolaan risiko operasional juga dilakukan dengan memperkuat aspek keamanan dan kehandalan operasi dari teknologi informasi sehingga kesalahan manusia, *fraud*, kesalahan proses dan potensi kegagalan sistem yang dapat menyebabkan terganggunya kelangsungan bisnis dapat ditekan dan diantisipasi lebih dini.

47. ADDITIONAL INFORMATION (continued)

Operational risk

Operational risk is the risk of direct or indirect loss resulting from inadequate or failure in internal processes, people and systems and/or from external problems that affect the Bank's operations.

This type of risk is inherent in all business processes, operational activities, systems and products of the Bank, from Head Office to Cash Office. Failure to manage operational risks properly could lead to financial losses, loss of employee safety, and reputation of the Bank until affected capital adequacy of the Bank. The Bank's objective in managing operational risk is to minimise the impact of the failure or inadequate internal process, people, system or from external events, which could have financial loss impact.

The Bank applies the operational risk management with the main target to ensure that the Bank has conducted a risk management process that includes risk identification, risk assessment, risk evaluation, risk mitigation and conducted monitoring and reporting on implementation. This is done with the ultimate target to maximise the benefits of a product/service or process transactions/activities with potential operational risks that have been taken into account.

A risk assessment process is carried out to evaluate the adequacy of internal control and risk identification and assessment in every process and product in each working unit to ensure compliance with the policies, rules and limits set down by the Bank's management. Operational risk management is also performed by strengthening security and operational aspects of information technology so that human error, fraud, processing errors and system failure that can affect business continuity can be anticipated and reduced.

47. INFORMASI TAMBAHAN (lanjutan)

Risiko operasional (lanjutan)

Dalam pemantauan risiko operasional, fungsi Satuan Kerja Audit Internal (SKAI) melaksanakan penilaian terhadap penerapan kebijakan dan prosedur manajemen risiko pada setiap aktivitas fungsional, produk atau layanan baru dan Satuan Kerja Manajemen Risiko (SKMR) memastikan proses identifikasi, pengukuran, pemantauan dan pengendalian risiko berjalan dengan efektif pada setiap aktivitas fungsional, produk atau layanan baru.

Pengawasan oleh Dewan Komisaris dan Direksi Bank atas profil risiko Bank dan pelaksanaan manajemen risiko dilakukan melalui rapat yang dilakukan secara berkala dengan jadwal yang telah ditentukan.

Selain kebijakan dan metode tersebut di atas, Bank juga telah menerapkan upaya yang terus menerus dikembangkan untuk membangun lingkungan budaya yang mendukung pelaksanaan manajemen risiko operasional. Hal tersebut dilakukan melalui penguatan pada tiga lini pertahanan (*three line of defense*) yaitu pemberdayaan unit bisnis sebagai lini pertahanan pertama, pembentukan fungsi manajemen risiko operasional sebagai lini pertahanan kedua dan koordinasi kerja dengan Internal Audit (SKAI) sebagai lini pertahanan ketiga.

Risiko hukum

Risiko hukum adalah risiko akibat tuntutan hukum dan/atau kelemahan aspek yuridis. Kelemahan aspek yuridis tersebut antara lain disebabkan adanya ketiadaan peraturan perundang-undangan yang mendukung atau kelemahan perikatan seperti tidak dipenuhinya syarat sahnya kontrak dan pengikatan dokumen yang tidak sempurna.

Sebagai sebuah perusahaan yang berdiri dalam yuridiksi hukum Indonesia, Bank harus selalu tunduk terhadap segala peraturan hukum yang dikeluarkan oleh regulator industri perbankan di Indonesia. Selain itu, Bank juga harus mengikuti segala bentuk peraturan perundangan yang berlaku di masyarakat baik yang terkait secara langsung maupun tidak langsung dengan kegiatan usaha Bank. Kegagalan Bank dalam mengikuti peraturan hukum yang berlaku dapat mengakibatkan pada timbulnya tuntutan hukum yang akan ditujukan kepada Bank. Apabila tuntutan-tuntutan hukum yang diajukan kepada Bank memiliki nilai yang material, maka hal tersebut dapat memberikan dampak secara langsung terhadap kinerja keuangan Bank.

47. ADDITIONAL INFORMATION (continued)

Operational risk (continued)

In monitoring operational risk, the Internal Audit (SKAI) conducted an assessment of the implementation of risk management policies and procedures in each functional activity, new products or services and Risk Management Unit (SKMR) function ensures the identification, measurement, monitoring and risk control work effectively on any functional activity, new products or services.

Monitoring by the Bank's Boards of Commissioners and Director actively monitor of the Bank's risk profile and its risk management implementation through meeting that are conducted regularly.

Other than policy and the above mentioned method, the Bank has continued developing its culture and support the implementation for operational risk. The three line of defense implementation, which consist of unit business as the first line of defense, establishment of operational risk management as second line of defense and coordination with Internal Audit (SKAI) as third line of defense.

Legal risk

Legal risk is the risk related to legal claims and/or weaknesses in the juridical aspect. Such weaknesses in legal aspect is caused, among others, by the lack of the supporting legislation or the weaknesses of contracts such as incomplete requirements for a valid contract and imperfect document contract.

As an entity which is governed by the laws of the Republic of Indonesia, the Bank should always comply with all such laws and regulations issued by the regulator in the banking industry in Indonesia. In addition, the Bank should also follow all prevailing rules and regulations in the society whether directly or indirectly related with the business activities conducted by the Bank. Failure by the Bank to comply with such prevailing laws and regulations may give rise to legal claims against the Bank. If legal claims against the Bank are material in amounts, then it may directly affect the Bank's financial performance.

47. INFORMASI TAMBAHAN (lanjutan)

Risiko hukum (lanjutan)

Bank melaksanakan identifikasi risiko hukum berdasarkan beberapa faktor-faktor yang meliputi tuntutan hukum, tidak adanya peraturan regulasi hukum yang mendukung, dan kelemahan perjanjian. Pengendalian risiko hukum dilakukan Bank dengan memastikan bahwa seluruh kegiatan dan hubungan kerja dengan pihak ketiga telah didasarkan pada aturan maupun persyaratan yang dapat melindungi kepentingan Bank dari segi hukum termasuk antisipasi terhadap potensi tuntutan dari pihak eksternal.

Untuk memitigasi risiko hukum yang mungkin timbul akibat tuntutan hukum atau kelemahan dari aspek hukum, Bank memiliki Biro Hukum. Biro tersebut memiliki peranan:

1) melakukan analisis hukum atas produk dan aktivitas baru serta membuat standar dokumen hukum yang terkait dengan produk dan aktivitas baru tersebut;
2) memberikan analisis/pendapat hukum;
3) memberikan pendapat atas eksposur hukum akibat perubahan ketentuan atau peraturan;
4) memeriksa segala perjanjian yang akan dibuat antara Bank dengan pihak ketiga; dan
5) melakukan pemeriksaan berkala atas perjanjian yang telah dibuat.

Dengan adanya biro tersebut, maka kebijakan hukum dan standar dokumen hukum yang terkait dengan produk atau fasilitas perbankan yang ditawarkan oleh Bank kepada masyarakat dimana kebijakan hukum dan standar dokumen hukum dimaksud dibuat dengan mengacu kepada ketentuan peraturan perundangan yang berlaku serta memperhatikan kepentingan aspek hukum dari Bank.

Selain itu, Biro Hukum juga memiliki bagian Litigasi untuk menangani setiap permasalahan hukum yang terkait dengan litigasi agar risiko hukum yang mungkin timbul dapat diminimalisir seminimum mungkin.

Pengelolaan risiko hukum dilakukan dengan memantau perkembangan kasus-kasus hukum yang terjadi dan mengambil pembelajaran dari kasus-kasus tersebut. Penanganan kasus hukum yang dilakukan pada Bank senantiasa memperhitungkan potensi kerugian.

47. ADDITIONAL INFORMATION (continued)

Legal risk (continued)

Bank implements legal risk identification based on several factors include lawsuits, lack of rule or law that supports the regulation and the weakness of the agreement. The Bank performed legal risk control to ensure that all activities and working relationships with third parties have been based on the rules and requirements that can protect the Bank's interests from legal terms including the anticipation of potential demands from external parties.

To mitigate the possible legal risk caused by legal claims or weaknesses in legal aspects, the Bank has a General Legal Counsel Bureau. Such division has the following functions:

1) to provide legal analysis on new product and activity and prepare standard legal document related with such new product and activity;
2) to provide legal analysis/advice;
3) to provide advice on legal exposure due to change of laws or regulations;
4) to review any contracts between the Bank and third party; and
5) to conduct a periodical review on contracts which have been executed.

Based on the bureau above, legal policy and legal document standards related to the product or banking facilities offered by the Bank to public, whereby the legal policy and legal document standards are intentionally made in accordance with the prevailing laws and regulations also considering the interests in the legal aspect of the Bank.

In addition, the General Legal Counsel Bureau also has a Litigation division to handle every legal case related to litigation so that the possible legal risk can be minimised as minimum as possible.

The legal risk is also conducted by monitoring the development of legal cases and take lesson learnt principle from those cases. The management of legal cases conducted by the Bank is calculating potential loss at all time.

47. INFORMASI TAMBAHAN (lanjutan)

Risiko reputasi

Risiko reputasi adalah risiko akibat menurunnya tingkat kepercayaan *stakeholder* yang bersumber dari persepsi negatif terhadap Bank. Risiko ini melekat dalam setiap kegiatan yang dilakukan oleh Bank. Kegagalan Bank dalam menjaga reputasinya di mata masyarakat dapat menimbulkan pandangan maupun persepsi negatif masyarakat terhadap Bank. Apabila risiko ini dihadapi oleh Bank, maka dalam waktu singkat dapat terjadi penurunan atau hilangnya kepercayaan nasabah terhadap Bank yang pada akhirnya akan memberikan dampak negatif terhadap pendapatan dan volume aktivitas Bank.

Risiko reputasi dapat berdampak langsung pada berkurangnya kepercayaan nasabah sehingga jumlah nasabah ataupun pendapatan Bank menurun. Dalam mengelola risiko reputasi, Bank berupaya untuk menjaga reputasi dengan memberikan pelayanan terbaik dalam menangani keluhan dan memberikan kepuasan kepada nasabah untuk menghindari munculnya keluhan tersebut di media.

Corporate Secretary setiap hari melakukan pengawasan atas pemberitaan media untuk memantau publikasi negatif atau keluhan nasabah yang muncul di media. Sedangkan pengawasan atas keluhan nasabah yang disampaikan langsung ke Bank dilakukan oleh *Group Quality Service* untuk kemudian ditindaklanjuti penyelesaiannya.

Untuk pemberitaan negatif dan keluhan nasabah yang muncul di media selanjutnya dibuatkan klarifikasi dan tanggapan sesuai dengan langkah yang akan ditempuh Bank. Upaya mitigasi risiko reputasi juga dilakukan saat Bank meluncurkan produk/layanan/program baru dengan menganalisis risiko reputasi yang mungkin timbul dan bagaimana mengantisipasi risiko tersebut. Demikian pula, untuk informasi yang material atau yang penting untuk diketahui oleh nasabah, *Corporate Secretary* juga menyiapkan panduan untuk para *frontliner* dan *spokespersons* agar mereka bisa menjelaskan informasi tersebut secara benar dan proporsional kepada nasabah.

47. ADDITIONAL INFORMATION (continued)

Reputation risk

Reputation risk is the risk related to the decreasing level of stakeholder's confidence arising from the negative perception on the Bank. Reputation risk is inherent in every activity conducted by the Bank. The Bank 's failure to protect its reputation in the public's eye may result in negative view as well as perception by the public towards the Bank. If the Bank faces this risk, then in the short run, the Bank may lose the customer's trust that will ultimately result in a negative impact to the Bank 's income and volume of activities.

Reputational risks can have a direct impact on the decreasing of customer confidence as a result the number of customers or the Bank's income decreased. In managing reputation risk, the Bank seeks to maintain a reputation for providing the best service to handle complaints and provide satisfaction to customers to avoid the appearance of such complaints in media.

The Corporate Secretary performs a daily media monitoring of the news to observe negative publications or customer's complaints which appear in the media. The monitoring of customer's complaints which are submitted directly to the Bank is performed by the Group Quality Service for follow up action to resolve.

For negative news publication and customer's complaints which appear in the media, a clarification and appropriate response will be conducted in accordance with the steps undertaken by the Bank. Efforts to mitigate the reputation risk are also undertaken everytime when the Bank launches a new product/service/program by analysing the possibility of reputation risk that may arise and how to anticipate such risk. Moreover, for material or important information to be known by the customer, the Corporate Secretary also prepares guidelines for frontliners and spokespersons so that they are able to explain the information correctly and proportionately to customers.

47. INFORMASI TAMBAHAN (lanjutan)

Risiko stratejik

Risiko stratejik adalah risiko akibat ketidaktepatan dalam pengambilan dan/atau penerapan suatu keputusan stratejik serta kegagalan dalam mengantisipasi perubahan lingkungan bisnis. Ketidakmampuan Bank dalam melakukan penyusunan strategi yang tepat dapat menimbulkan kegagalan bisnis Bank di masa yang akan datang.
Risiko ini juga mencakup kemampuan Bank dalam meningkatkan daya saing dan menciptakan keunggulan kompetitif Bank di tengah kompetisi perbankan yang semakin ketat. Ketidakmampuan Bank dalam menghadapi tantangan bisnis yang terus mengalami perubahan dari waktu ke waktu akan mengakibatkan kegagalan bagi Bank untuk mencapai visi yang selama ini telah ditetapkan.

Bank mengelola risiko stratejik melalui proses pertimbangan dan pengambilan keputusan secara komprehensif dan kolektif di lingkungan komite-komite pengawasan dan eksekutif, yang turut mempengaruhi dan berdampak pada langkah-langkah bisnis yang akan diambil dalam kerangka kebijakan dan arah yang telah ditetapkan oleh Bank.

Risiko kepatuhan

Risiko kepatuhan merupakan risiko akibat Bank tidak mematuhi dan/atau tidak melaksanakan peraturan perundang-undangan dan ketentuan yang berlaku. Dalam menjalankan kegiatan usaha pada industri Perbankan, Bank diwajibkan untuk selalu tunduk terhadap peraturan perbankan yang diterbitkan baik oleh Pemerintah, Bank Indonesia maupun Otoritas Jasa Keuangan (OJK).

Pada umumnya, risiko kepatuhan melekat pada Bank sebagai sebuah lembaga perbankan, seperti: risiko kredit terkait dengan ketentuan Kewajiban Penyediaan Modal Minimum (KPMM); Penilaian Kualitas Aset; Pembentukan Cadangan Kerugian Penurunan Nilai (CKPN); Batas Maksimum Pemberian Kredit (BMPK); penerapan tata kelola yang baik (*GCG*) dan risiko lain yang terkait dengan ketentuan tertentu termasuk peraturan OJK dan Bank Indonesia yang relevan. Ketidakmampuan Bank untuk mengikuti dan mematuhi seluruh peraturan perundangan yang terkait dengan kegiatan usaha Bank dapat berdampak terhadap kelangsungan usaha Bank.

47. ADDITIONAL INFORMATION (continued)

Strategic risk

Strategic risk is the risk due to inaccuracy in deciding and/or implementing a strategic decision as well as the failure in anticipating the changes in the business environment. Failure in formulating the right strategy may deteriorate the Bank's business in the future.

This risk also includes the Bank's ability to develop its competitiveness and create a Bank's competitiveness edge amidst the stiff competition in the banking industry. The inability of Bank to cope with such business challenges which are constantly changing from time to time will lead Bank to failure to accomplished determined vision.

The Bank manages strategic risks through a comprehensive and collective consideration and decision-making processes encompassing areas of the supervisory and executive committee that influence and impact business decisions on policies and directions that the Bank will embark on.

Compliance risk

Compliance risk is the risks resulting from the failure of the Bank in fulfilling and/or implementing the prevailing laws and regulations. In engaging in the banking industry services, the Bank is required to always comply with the banking regulations issued by the Government, Central Bank and Financial Services Authority (OJK).

In general, the compliance risk is embedded in the Bank as a banking institution, such as: credit risks related to Capital Adequacy Ratio (CAR) regulations; Assessment of Assets Quality; Allowance for Impairment Losses (CKPN); Legal Lending Limit (LLL); Good Corporate Governance (GCG) and other risks related to certain regulations including OJK and Central Bank relevant regulations. The inability of the Bank to follow and comply with all laws and regulations related to the Bank's business activities may affect the continuity of the Bank's operation.

47. INFORMASI TAMBAHAN (lanjutan)

Risiko kepatuhan (lanjutan)

Risiko kepatuhan dapat bersumber dari perilaku hukum, yaitu perilaku atau aktivitas Bank yang menyimpang atau melanggar dari ketentuan dan/atau peraturan perundang-undangan serta perilaku organisasi, yaitu perilaku atau aktivitas Bank yang menyimpang atau bertentangan dari standar yang berlaku secara umum.

Wujud penerapan manajemen risiko kepatuhan antara lain dengan mewujudkan terlaksananya budaya kepatuhan pada seluruh kegiatan usaha Bank di setiap jenjang organisasi, menilai dan mengevaluasi kecukupan, dan kesesuaian kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank dengan ketentuan dan peraturan yang berlaku, memantau atas pelaksanaan prinsip kehati-hatian Bank.

Bank melakukan identifikasi dan pengelolaan risiko kepatuhan sejak awal dengan memberikan bantuan kepada unit bisnis dan unit operasional dalam hal pengembangan produk dan aktivitas baru dan secara aktif melakukan penilaian terhadap kebijakan Pedoman dan Prosedur Internal yang dimiliki oleh Bank untuk memastikan bahwa seluruh peraturan eksternal telah diakomodir sedemikian rupa dan selanjutnya untuk dipatuhi dalam pelaksanaannya.

Batas Maksimum Penyaluran Kredit

Pada tanggal 26 Desember 2018, OJK mengeluarkan ketentuan baru yaitu No. 32/POJK.03/2018 tentang "Batas Maksimum Pemberian Kredit dan Penyediaan Dana Besar bagi Bank Umum" yang berlaku efektif sejak 1 September 2019 yang sebagian pasalnya diubah dengan POJK No. 38/POJK.03/2019 tanggal 19 Desember 2019. Peraturan tersebut menetapkan batas maksimum penyediaan dana kepada satu debitur dan/atau kelompok debitur yang bukan merupakan pihak berelasi tidak melebihi 25% dari modal inti Bank. Pada tanggal 31 Desember 2024 dan 2023 tidak terdapat pelampauan dan pelanggaran atas BMPK baik kepada pihak berelasi maupun pihak ketiga.

47. ADDITIONAL INFORMATION (continued)

Compliance risk (continued)

Compliance risk may arise from legal behavior, which is the Bank's behavior or activity that deviates from or violates the provisions and/or laws and regulations, as well as organizational behavior, which is the Bank's behavior or activity that deviates from or in contrary to the generally accepted standards.

The implementation of compliance risk management, among others, is by achieving the implementation of compliance culture at all of the Bank's business activities at every organizational level, assessing and evaluating the adequacy and conformity of the Bank's policies, regulations, systems, and procedures against the applicable provisions and regulations, monitoring the implementation of the Bank's prudential principles.

The Bank implements early detection and management of compliance risks by providing assistance to business and operational units and new product and new activity and also evaluated the Bank's Guidelines and Procedures to ensure that all external regulations have been accommodated and implemented correctly.

Maximum Limit for Distribution of Loans

On December 26, 2018, OJK issued new regulation No. 32/POJK.03/2018 regarding "Legal Lending Limit and Large Exposure *for Commercial Bank" which effective since September 1, 2019, which amended partially by POJK No. 38/POJK.03/2019 dated December 19, 2019. This regulation requires the maximum lending limit to one and/or group of nonrelated party debtor which not exceed to 25% of the Bank's core capital. As of December 31, 2024 and 2023, there were no breach and no violation of the LLL requirements both to related parties and third parties.*

48. PERISTIWA SETELAH PERIODE PELAPORAN

Pada tanggal 15 Januari 2025, Bank bersama dengan pemegang saham PT Victoria Investama Tbk ("VICO") melakukan penandatanganan Perjanjian Jual Beli Saham Bersyarat ("PJBSB") dengan PT Bank Tabungan Negara (Persero) Tbk ("BTN") sehubungan dengan rencana pengambilalihan yang akan dilakukan oleh BTN atas entitas asosiasi, PT Bank Victoria Syariah ("BVIS"), dimana BTN akan melakukan pembelian saham yang dimiliki oleh Bank dan VICO sesuai dengan persyaratan dan ketentuan dalam PJBSB tersebut.

Sampai dengan tanggal dari laporan keuangan ini, proses pengambilalihan BVIS masih dalam proses.

48. EVENTS AFTER THE REPORTING PERIOD

On January 15, 2025, the Bank together with the shareholder PT Victoria Investama Tbk ("VICO") signed Conditional Shareholder and Purchase Agreement ("CSPA)" with PT Bank Tabungan Negara (Persero) Tbk ("BTN") in connection with acquisition plan of BTN over associate entity, PT Bank Victoria Syariah ("BVIS"), whereby BTN will purchase the shares owned by the Bank and VICO in accordance with to the terms and condition in CSPA.

Until the date of this financial statements, the acquisition is still on process.

49. STANDAR AKUNTANSI YANG TELAH DITERBITKAN NAMUN BELUM BERLAKU EFEKTIF

Standar akuntansi yang telah diterbitkan sampai tanggal penerbitan laporan keuangan Bank namun belum berlaku efektif diungkapkan berikut ini. Manajemen bermaksud untuk menerapkan standar-standar tersebut yang dipertimbangkan relevan terhadap Bank pada saat efektif, dan dampaknya terhadap posisi dan kinerja keuangan Bank masih diestimasi pada tanggal 31 Desember 2024:

Mulai efektif pada atau setelah tanggal 1 Januari 2025

Amandemen PSAK 221 (dahulu PSAK 10): Kekurangan Ketertukaran

Amandemen tersebut mengharuskan pengungkapan informasi yang memungkinkan pengguna laporan keuangan memahami dampak mata uang yang tidak dapat dipertukarkan. Amandemen berlaku untuk periode pelaporan yang dimulai atau setelah tanggal 1 Januari 2025. Penerapan dini diperkenankan dimana entitas diharuskan mengungkapkan fakta tersebut. Tanggal penerapan awal adalah awal periode pelaporan tahunan saat entitas pertama kali menerapkan amandemen tersebut.

49. ACCOUNTING STANDARDS ISSUED BUT NOT YET EFFECTIVE

The accounting standards that have been issued up to the date of issuance of the Bank's financial statements, but not yet effective are disclosed below. The management intends to adopt these standards that are considered relevant to the Bank when they become effective, and the impact to the financial position and performance of the Bank is still being estimated as of December 31, 2024:

Effective beginning on or after January 1, 2025

Amendment of SFAS 221 (previously SFAS 10): Lack of Exchangeability

The amendments require disclosure of iinformation that enables users of financial statements to understand the impact of a currency not being exchangeable. The amendments apply for annual reporting periods beginning on or after 1 January 2025. Earlier application is permitted which an entity is required to disclose that fact. The date of initial application is the beginning of the annual reporting period in which an entity first applies the amendments.

bank victoria

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2024

Laporan Tahunan dan Keberlanjutan
Annual and Sustainability Report

PT Bank Victoria International Tbk berizin dan diawasi oleh Otoritas Jasa Keuangan dan Bank Indonesia serta merupakan peserta penjaminan Lembaga Penjamin Simpanan.