bank sinarmas



# MELAJU BERSAMA

## Advancing Together

**Laporan Tahunan & Keberlanjutan**
Annual & Sustainability Report

**2024**

# Melaju Bersama
## Advancing Together

**SANGGAHAN DAN BATASAN TANGGUNG JAWAB**
Disclaimer and Limitation of Liability

Laporan Tahunan dan Keberlanjutan 2024 PT. Bank Sinarmas Tbk. (yang selanjutnya disebut "Bank Sinarmas" atau "Bank") disusun berdasarkan Peraturan Otoritas Jasa Keuangan No. 29/POJK.04/2016 tentang Laporan Tahunan Emiten atau Perusahaan Publik serta Peraturan Otoritas Jasa Keuangan No. 51/POJK.03/2017 tentang Penerapan Keuangan Berkelanjutan bagi Lembaga Jasa Keuangan, Emiten, dan Perusahaan Publik. Muatan konten laporan ini sesuai dengan Surat Edaran Otoritas Jasa Keuangan No. 16/SEOJK.04/2021 tentang Bentuk dan Isi Laporan Tahunan Emiten atau Perusahaan Publik dan kriteria Annual Report Award.

Laporan ini memuat informasi terkait prinsip-prinsip keberlanjutan dalam seluruh aspek bisnis yang dijalankan serta kinerja ekonomi, sosial, dan lingkungan Bank selama periode 1 Januari 2024 hingga 31 Desember 2024, disertai dengan perbandingan kinerja tahun-tahun sebelumnya. 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.

Informasi lebih lanjut terkait laporan ini dan muatan di dalamnya dapat diperoleh melalui:


**Retno Tri Wulandari**

**Sekretaris Perusahaan**
Corporate Secretary

**Sinar Mas Land Plaza Tower I, Lt. 1 & 2**
Jl. MH Thamrin Kav. 51
Jakarta 10350
T: +62 21 3199 0101
F: +62 21 3199 0401
E: corporate.secretary@banksinarmas.com


The 2024 Annual and Sustainability Report of PT. Bank Sinarmas Tbk. (hereinafter referred to as "Bank Sinarmas" or the "Bank") was prepared based on Financial Services Authority Regulation No. 29/POJK.04/2016 on Annual Reports of Issuers or Public Companies and Financial Services Authority Regulation No. 51/POJK.03/2017 on the Implementation of Sustainable Finance for Financial Services Institutions, Issuers and Public Companies. The content of this report is in accordance with the Financial Services Authority Circular No. 16/SEOJK.04/2021 on the Form and Content of Annual Reports of Issuers or Public Companies and the criteria for the Annual Report Award.

This report contains information regarding the sustainability principles in all aspects of business carried out as well as the economic, social, and environmental performance of the Bank during the period of January 1, 2024, to December 31, 2024, accompanied by a comparison of previous years' performance. This Annual Report also presents information related to the Bank's work projections in the following year which are prepared based on prospective statements and various assumptions regarding the Bank's future condition, 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 this information wisely in making decisions.

Further information regarding this report and its contents can be obtained through:

**Memperingati ulang tahun ke-35 Bank Sinarmas memperkenalkan tema "Melaju Bersama" yang memiliki makna simbolis yang kuat dan melambangkan perjalanan panjang bersama-sama nasabah, karyawan, dan pemangku kepentingan lainnya dalam mencapai tujuan bersama.**

To commemorate the 35th anniversary, Bank Sinarmas introduces the theme "Advancing Together." This phrase carries profound symbolism, reflecting the Bank's shared journey with customers, employees, and stakeholders toward common goals.

# KESINAMBUNGAN TEMA
## Themes Continuity












# 2020

## Optimizing Our Digital Services

Bank Sinarmas memiliki komitmen dalam pengembangan *digital*, antara lain dilakukan melalui aplikasi SimobiPlus. Aplikasi ini merupakan layanan *digital banking* Bank Sinarmas untuk memberikan kemudahan, kenyamanan, dan keamanan transaksi bagi nasabah.

Melalui layanan *digital* tersebut, Bank berupaya meningkatkan kemudahan dan kepuasan nasabah dalam melakukan transaksi perbankan. Seiring dengan meningkatnya pengguna layanan tersebut, Bank terus menambah fitur *digital* serta memperkuat infrastruktur keamanan transaksi.

Pengembangan *digital* ini juga memberikan manfaat bagi Bank, yaitu meningkatnya loyalitas nasabah. Untuk itulah, Bank berkomitmen untuk terus mengembangkan layanan *digital* secara berkesinambungan, sekaligus sebagai respon terhadap tren dalam industri keuangan khususnya perbankan.

Bank Sinarmas has a commitment to digital development, among others, through the SimobiPlus application. This application is a digital banking service from Bank Sinarmas to provide facilities, convenience, and security of transactions for customers.

Through this digital service, the Bank seeks to improve customer convenience and satisfaction in conducting banking transactions. Along with the increasing number of service users, the Bank continues to add digital features and strengthen the transaction security infrastructure.

This digital development is also beneficial for the Bank in increasing customer loyalty. For this reason, and in response to trends in the financial industry - particularly banking, the Bank is committed to continuously developing digital services on an ongoing basis.

# 2021

## Adapting Sustainability Through Digitalization

Bank Sinarmas mendukung pentingnya pertumbuhan ekonomi berkelanjutan yang menyelaraskan kepentingan ekonomi, sosial, dan lingkungan hidup. Layanan perbankan yang telah terdigitalisasi secara optimal merupakan langkah Bank Sinarmas untuk terus beradaptasi menuju pembangunan berkelanjutan.

Bank Sinarmas telah meluncurkan sejumlah layanan perbankan *digital* dan terus melakukan inovasi dan pembaruan terhadap produknya. Layanan *digital* perbankan yang terintegrasi dalam aplikasi *mobile banking* SimobiPlus mampu memberikan *Omnichannel Experience* sebagai penunjang gaya hidup nasabah, serta menjadi jembatan nasabah dalam mengakses layanan perbankan.

Sebagai bentuk adaptasi menuju perbankan berkelanjutan, Bank Sinarmas meluncurkan program *Green Saving* yang mengajak nasabah dan seluruh kalangan masyarakat memaksimalkan penggunaan energi terbarukan, khususnya sinar matahari. Hal sederhana seperti menggunakan *Green Energy* yang ramah lingkungan dapat membawa perubahan besar di kemudian hari, sesuai tagline Bank Sinarmas #biasakansekarangluarbiasananti.

Bank Sinarmas supports the importance of sustainable economic growth which aligns economic, social, and environmental goals. Optimally digitalized banking services are an effort by Bank Sinarmas to continue to adapt in order to contribute to the achievement of sustainable development.

Bank Sinarmas has launched several digital banking services and will continue to innovate and update its products. Digital banking services that are integrated into the SimobiPlus mobile banking application can provide Omnichannel Experience to support customers' lifestyles and become a bridge for customers to access banking services.

As a form of adaptation toward sustainable banking, Bank Sinarmas launched the Green Saving program which invites customers and the public to maximize the use of renewable energy, particularly sunlight. Simple steps, such as using eco-friendly Green Energy, can bring about big changes in the future, which is in line with the Bank's tagline #biasakansekarangluarbiasananti.

# 2022

## Empowering Life

Sepanjang tahun 2022, Bank Sinarmas terus memacu kinerja dalam menjalankan fungsi intermediasi keuangan dalam perekonomian. Melalui kegiatan penghimpunan dana dan penyaluran kredit, Bank Sinarmas terus memobilisasi dana masyarakat untuk digunakan dalam aktivitas produktif yang memberi mata pencaharian bagi jutaan orang. Melalui berbagai layanan perbankan yang diberikan, termasuk layanan perbankan *digital* terkini dalam aplikasi mobile banking SimobiPlus, Bank Sinarmas terus menghadirkan kemudahan bagi nasabah dalam menjalankan aktivitas sehari-hari, baik dalam urusan bisnis maupun kehidupan pribadi. Melalui komitmennya terhadap keuangan berkelanjutan, Bank Sinarmas mendukung pertumbuhan ekonomi berkelanjutan yang menyelaraskan kepentingan ekonomi, sosial, dan lingkungan hidup.

Melalui berbagai langkah tersebut, Bank Sinarmas melanjutkan kontribusinya dalam memberdayakan kehidupan semakin banyak orang di Indonesia, kini dan di masa mendatang.

Throughout 2022, Bank Sinarmas continues to boost performance in carrying out the financial intermediary function in the economy. Through funding and lending activities, Bank Sinarmas continues to mobilize public funds to be used in productive activities that provide livelihoods for millions of people. Through various banking services provided, including the latest digital banking services in the SimobiPlus mobile banking apps, Bank Sinarmas continues to provide convenience for customers in carrying out their daily activities both in business and in personal life. Through its commitment to sustainable finance, Bank Sinarmas supports sustainable economic growth that harmonizes economic, social, and environmental interests.

Through these various steps, Bank Sinarmas continues its contribution in empowering the lives of more and more people in Indonesia, now and in the future.




# 2023

## Sustaining Business Endurance

Bank Sinarmas terus menunjukkan komitmen yang kuat dalam menghadapi dinamika ekonomi dan persaingan industri di sepanjang tahun 2023. Dengan rangkaian strategi yang saling terintegrasi antara pengelolaan aspek ekonomi, sosial, dan lingkungan, Bank terus mengupayakan pertumbuhan bisnis yang sehat, berdaya tahan, dan bermakna. Setiap strategi diambil dengan orientasi jangka panjang, mulai dari penguatan layanan perbankan dengan mengutamakan digitalisasi, pengendalian tingkat suku bunga secara selektif, penguatan permodalan, bahkan pemisahan Unit Usaha Syariah untuk menjaga keseimbangan operasional. Dalam penyaluran kredit, Bank tidak hanya memprioritaskan sektor-sektor yang memiliki prospek usaha yang baik dan agunan yang memadai, tetapi juga mempertimbangkan faktor lingkungan dan sosial didalamnya.

Bank Sinarmas continued to demonstrate strong commitment in dealing with the economic dynamics and industry challenges throughout 2023. With an integrated set of strategies including economic, social, and environmental aspects, the Bank consistently attempted for sustainable, resilient, and meaningful business growth. Each strategy was taken with a long-term orientation, starting from strengthening banking services by prioritizing digitalization, selectively controlling interest rates, strengthening capital, and even separating Sharia Business Units to maintain operational balance. In credit disbursement, the Bank did not only prioritize sectors with good business outlook and adequate collateral but also considering environmental and social factors within it.




# 2024

## Melaju Bersama
## Advancing Together

Memperingati ulang tahun ke-35 Bank Sinarmas memperkenalkan tema "Melaju Bersama" yang memiliki makna simbolis yang kuat dan melambangkan perjalanan panjang bersama-sama nasabah, karyawan, dan pemangku kepentingan lainnya dalam mencapai tujuan bersama.

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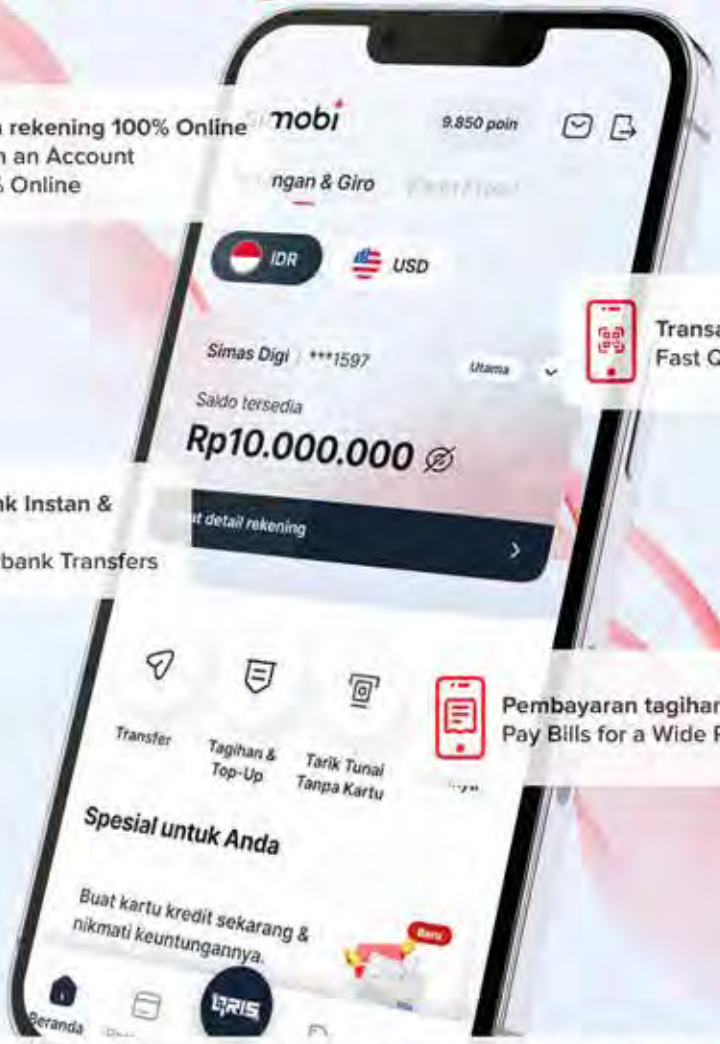
# simobi+

## Transaksi dalam genggaman untuk #FinansialLebihBaik

Transactions at your fingertips for #BetterFinancial

# #SenyamanItu




**Buka rekening 100% Online**
Open an Account 100% Online

**Transaksi QRIS Cepat**
Fast QRIS Transactions

**Transfer antarbank Instan & 24/7**
Instant, 24/7 Interbank Transfers

**Pembayaran tagihan beragam layanan**
Pay Bills for a Wide Range of Services

**Beragam keunggulan Simobi+** | Various advantages of **Simobi+**

### Mudah | Effortless

**Dapat diakses menggunakan *smartphone* berbasis Android, Iphone, dan Blackberry, serta dapat menggunakan seluruh operator selular di Indonesia.**
Accessible via Android, iPhone, and BlackBerry smartphones—compatible with all mobile operators across Indonesia

### Nyaman | Convenient

**Dapat melakukan transaksi perbankan di mana pun dan kapan pun selama tersedia jaringan internet dan jaringan SMS *provider* telepon yang digunakan.**
Conducting banking transactions anytime and anywhere, provided there is access to an internet connection or the SMS network of the mobile service provider in use.

### Aman | Secured

**Untuk transaksi menggunakan Simobi, nasabah harus menggunakan nomor handphone yang terdaftar di sistem Bank Sinarmas, dengan *password* yang dibuat sendiri oleh nasabah di mesin ATM. Untuk otentikasi berikutnya menggunakan SMS Token sebagai validasi transaksi.**
To conduct transactions using Simobi, customers must use the mobile phone number registered in the Bank Sinarmas system, with the password created by the customer at the ATM machine. For the next authentication, it uses SMS Token as the transaction validation.

# IKHTISAR KINERJA 2024

## 2024 Performance Highlights



.01

# IKHTISAR KINERJA
## Performance Highlights

### Kinerja Keuangan [OJK F.2][GRI 201-1]
### Financial Performance

Rp Juta, kecuali dinyatakan lain

Rp Million, unless otherwise stated

| Keterangan | 2024 | 2023 | 2022 | 2021 | 2020 | Description |
|---|---|---|---|---|---|---|
| **Laporan Posisi Keuangan** | | | | | | **Statement of Financial Position** |
| **Aset** | | | | | | **Assets** |
| Kas | 509.207 | 388.102 | 386.167 | 571.425 | 629.712 | Cash |
| Giro pada Bank Indonesia | 5.706.437 | 6.022.812 | 4.132.468 | 2.137.244 | 1.623.067 | Current Accounts with Bank Indonesia |
| Giro pada Bank Lain – Bersih | 2.020.989 | 2.655.935 | 1.719.763 | 3.147.827 | 2.156.806 | Current Accounts with Other Banks – Net |
| Penempatan pada Bank Indonesia dan Bank Lain – Bersih | 8.725.976 | 6.263.377 | 4.802.861 | 9.592.917 | 1.905.318 | Placements with Bank Indonesia and Other Banks – Net |
| Efek-efek – Bersih | 22.123.030 | 18.131.802 | 18.646.763 | 14.582.531 | 9.183.303 | Securities – Net |
| Efek yang Dibeli dengan Janji Jual Kembali – Bersih | 192.215 | - | - | 1.672.987 | 4.586.086 | Securities Purchased Under Agreements to Resell – Net |
| Kredit yang Diberikan dan Piutang/ Pembiayaan Syariah – Bersih | 12.806.287 | 15.185.200 | 13.379.839 | 16.313.869 | 18.878.373 | Loans and Receivables/Sharia Financing – Net |
| Tagihan Akseptasi – Bersih | 38.129 | 78.304 | 77.389 | 247.165 | 153.577 | Acceptance Receivables – Net |
| Penyertaan Modal Sementara | - | - | - | - | 281.405 | Temporary Equity Investments |
| Pendapatan yang Masih Akan Diterima | 405.091 | 326.751 | 304.040 | 315.777 | 243.768 | Accrued Income |
| Biaya Dibayar di Muka | 611.977 | 921.948 | 1.279.454 | 1.601.446 | 1.935.587 | Prepaid Expenses |
| Aset Tetap – Bersih | 1.555.763 | 1.606.075 | 1.508.203 | 1.540.865 | 1.584.298 | Fixed Assets – Net |
| Aset Ijarah – Bersih | 292.544 | 384.218 | 397.619 | 396.386 | 463.152 | Ijarah Assets – Net |
| Aset Pajak Tangguhan – Bersih | 261.361 | 214.568 | 196.886 | 64.120 | 54.930 | Deferred Tax Assets – Net |
| Aset Lain-lain – Bersih | 375.427 | 455.904 | 519.149 | 487.422 | 932.663 | Other Assets – Net |
| **Jumlah Aset** | **55.624.433** | **52.634.996** | **47.350.601** | **52.671.981** | **44.612.045** | **Total Assets** |
| **Liabilitas** | | | | | | **Liabilities** |
| Liabilitas Segera | 178.778 | 167.982 | 129.064 | 116.189 | 193.249 | Liabilities Immediately Payable |
| Simpanan | 37.897.415 | 35.142.585 | 32.397.026 | 37.961.555 | 30.763.916 | Deposits |
| Simpanan dari Bank Lain | 66.760 | 327.445 | 14.149 | 79.243 | 61.198 | Deposits from Other Banks |
| Efek yang Dijual dengan Janji Dibeli Kembali | 879.455 | 1.051.717 | - | - | 1.042.913 | Securities Sold Under Agreements to Repurchase |
| Utang Pajak | 52.719 | 52.572 | 158.846 | 29.745 | 71.082 | Taxes Payable |
| Liabilitas Akseptasi | 38.160 | 79.880 | 78.065 | 250.424 | 153.617 | Acceptance Payable |
| Beban yang Masih Harus Dibayar | 44.216 | 43.816 | 29.078 | 23.094 | 41.183 | Accrued Expenses |
| Liabilitas Imbalan Kerja Jangka Panjang | 44.749 | 35.426 | 36.141 | 27.840 | 29.288 | Long-term Employee Benefits Liabilities |
| Obligasi Subordinasi – Bersih | 497.505 | 496.512 | 495.521 | - | - | Subordinated Bonds – Net |
| Liabilitas Lain-lain | 399.533 | 390.973 | 209.291 | 311.579 | 201.475 | Other Liabilities |
| **Jumlah Liabilitas** | **40.099.290** | **37.788.908** | **33.547.181** | **38.799.669** | **32.557.921** | **Total Liabilities** |
| **Dana Syirkah Temporer** | | | | | | **Temporary Shirkah Fund** |
| Simpanan | 6.922.549 | 7.003.551 | 6.317.009 | 6.507.363 | 5.992.639 | Deposits |
| Simpanan dari Bank Lain | 2.972 | 15.769 | 201.403 | 5.533 | 4.641 | Deposits from Other Banks |
| **Jumlah Dana Syirkah Temporer** | **6.925.521** | **7.019.320** | **6.518.412** | **6.512.896** | **5.997.280** | **Total Temporary Shirkah Fund** |

Rp Juta, kecuali dinyatakan lain

Rp Million, unless otherwise stated

| Keterangan | 2024 | 2023 | 2022 | 2021 | 2020 | Description |
|---|---|---|---|---|---|---|
| **Ekuitas** | | | | | | **Equity** |
| Modal Saham | 1.971.616 | 1.971.616 | 1.971.616 | 1.746.180 | 1.746.180 | Capital Stock |
| Tambahan Modal Disetor – Bersih | 3.552.194 | 3.552.194 | 3.552.194 | 2.368.655 | 2.368.655 | Additional Paid-in Capital – Net |
| Dana Setoran Modal | - | - | - | 1.408.975 | - | Advance for Shares Subscriptions |
| Komponen Ekuitas Lainnya | 502.000 | 588.242 | 118.628 | 407.324 | 637.954 | Other Equity Components |
| Saldo Laba Ditentukan Penggunaannya | 10.000 | 9.500 | 9.000 | 8.500 | 8.000 | Appropriated Retained Earnings |
| Saldo Laba Tidak Ditentukan Penggunaannya | 1.996.630 | 1.705.216 | 1.633.570 | 1.419.782 | 1.296.055 | Unappropriated Retained Earnings |
| Kepentingan Non-Pengendali | 567.182 | - | - | - | - | Non-Controlling Interests |
| **Jumlah Ekuitas** | **8.599.622** | **7.826.768** | **7.285.008** | **7.359.416** | **6.056.844** | **Total Equity** |
| **Jumlah Liabilitas, Dana Syirkah Temporer, dan Ekuitas** | **55.624.433** | **52.634.996** | **47.350.601** | **52.671.981** | **44.612.045** | **Total Liabilities, Temporary Shirkah Fund, and Equity** |
| **Laporan Laba Rugi dan Penghasilan Komprehensif Lain** | | | | | | **Statement of Profit or Loss and Other Comprehensive Income** |
| Pendapatan Bunga | 3.018.913 | 2.781.795 | 2.527.616 | 2.622.909 | 2.632.465 | Interest Income |
| Pendapatan Syariah | 769.990 | 734.016 | 770.841 | 695.070 | 667.796 | Sharia Income |
| Beban Bunga | (829.608) | (632.923) | (566.923) | (687.603) | (905.187) | Interest Expenses |
| Beban Syariah | (360.487) | (259.569) | (198.887) | (214.579) | (206.870) | Sharia Expenses |
| Pendapatan Bunga dan Syariah – Bersih | 2.598.808 | 2.623.319 | 2.532.647 | 2.415.797 | 2.188.204 | Interest and Sharia Income – Net |
| Pendapatan Operasional Lainnya | 976.348 | 926.065 | 760.183 | 924.999 | 1.687.729 | Other Operating Revenue |
| Beban Operasional Lainnya | (3.136.340) | (3.475.806) | (3.015.619) | (3.181.278) | (3.759.333) | Other Operating Expenses |
| Laba Sebelum Pajak | 438.816 | 73.578 | 277.211 | 159.518 | 116.600 | Profit Before Tax |
| Manfaat (Beban) Pajak | (68.679) | 2.218 | (56.051) | (31.770) | 1.922 | Tax Benefit (Expense) |
| Laba Bersih | 370.137 | 75.796 | 221.160 | 127.748 | 118.522 | Net Profit |
| Penghasilan (Rugi) Komprehensif Lain | (85.173) | 465.964 | (295.568) | (234.151) | 145.348 | Other Comprehensive Income (Loss) |
| Jumlah Laba (Rugi) Komprehensif Lain | 284.964 | 541.760 | (74.408) | (106.403) | 263.870 | Total Other Comprehensive Income (Loss) |
| Laba per Saham Dasar (dalam Rupiah penuh) | 14,75 | 3,84 | 11,22 | 6,50 | 6,80 | Basic Earnings per Share (in full Rupiah) |
| **Laba (Rugi) Tahun Berjalan** | | | | | | **Income (Loss) for the Year** |
| Diatribusikan kepada Pemilik Entitas Induk | 290.845 | 75.796 | 221.160 | 127.748 | 118.522 | Attributable to Owners of the Parent Entity |
| Diatribusikan kepada Kepentingan Non-Pengendali | 79.292 | - | - | - | - | Attributable to Non-Controlling Interests |
| **Laba (Rugi) Komprehensif Tahun Berjalan** | | | | | | **Comprehensive Income (Loss) for the Year** |
| Diatribusikan kepada Pemilik Entitas Induk | 205.672 | 541.760 | (74.408) | (106.403) | 263.870 | Attributable to Owners of the Parent Entity |
| Diatribusikan kepada Kepentingan Non-Pengendali | 79.292 | - | - | - | - | Attributable to Non-Controlling Interests |
| **Laporan Arus Kas** | | | | | | **Cash Flow Statement** |
| Arus Kas dari Aktivitas Operasi | 1.165.114 | 4.628.695 | (4.999.465) | 7.837.071 | 2.116.579 | Cash Flow from Operating Activities |
| Arus Kas dari Aktivitas Investasi | (152.118) | (188.267) | (119.425) | (114.928) | (242.578) | Cash Flow from Investing Activities |
| Arus Kas dari Aktivitas Pendanaan | 372.097 | (111.120) | 397.299 | 1.329.009 | 203.099 | Cash Flow from Financing Activities |
| Kenaikan (Penurunan) Bersih Kas dan Setara Kas | 1.385.093 | 4.329.308 | (4.721.591) | 9.051.152 | 2.077.100 | Net Increase (Decrease) in Cash and Cash Equivalents |
| Kas dan Setara Kas Awal Tahun | 15.331.170 | 11.042.096 | 15.452.929 | 6.316.455 | 4.213.323 | Cash and Cash Equivalents at Beginning of Year |
| Pengaruh Perubahan Kurs Mata Uang Asing | 247.050 | (40.234) | 310.758 | 85.322 | 26.032 | Effect of Changes in Foreign Exchange Rates |
| Kas dan Setara Kas Akhir Tahun | 16.963.313 | 15.331.170 | 11.042.096 | 15.452.929 | 6.316.455 | Cash and Cash Equivalents End of Year |

Rp Juta, kecuali dinyatakan lain

Rp Million, unless otherwise stated

| Keterangan | 2024 | 2023 | 2022 | 2021 | 2020 | Description |
|---|---|---|---|---|---|---|
| **Rasio Keuangan Penting** | | | | | | **Key Financial Ratios** |
| **Permodalan (%)** | | | | | | **Capital (%)** |
| Kewajiban Penyediaan Modal Minimum (KPMM) | 30,46 | 25,34 | 29,49 | 29,12 | 17,29 | Capital Adequacy Ratio (CAR) |
| Aset Tetap terhadap Modal | 35,17 | 34,31 | 34,30 | 35,65 | 39,71 | Fixed Assets to Capital |
| **Aset Produktif (%)** | | | | | | **Earning Assets (%)** |
| Aset Produktif Bermasalah terhadap Jumlah Aset Produktif | 1,41 | 1,66 | 3,14 | 1,80 | 3,70 | Non-Performing Earning Assets to Total Earning Assets |
| Kredit Bermasalah – Gross | 1,49 | 1,53 | 7,99 | 4,64 | 4,75 | Non-performing Loans - Gross |
| Kredit Bermasalah – Bersih | 0,30 | 0,35 | 2,49 | 1,18 | 1,39 | Non-performing Loans - Net |
| CKPN terhadap Aset Produktif | 3,67 | 3,82 | 5,26 | 3,43 | 4,54 | Impairment Losses on Earning Assets |
| Pemenuhan CKPN | 100,00 | 100,00 | 100,00 | 100,00 | 100,00 | Impairment Losses Fulfillment |
| **Rentabilitas (%)** | | | | | | **Rentability (%)** |
| Tingkat Pengembalian Aset | 0,82 | 0,15 | 0,54 | 0,34 | 0,30 | Return on Assets |
| Tingkat Pengembalian Ekuitas | 5,01 | 1,07 | 3,27 | 2,02 | 2,25 | Return on Equity |
| Margin Bunga Bersih | 5,89 | 6,26 | 5,68 | 5,79 | 6,25 | Net Interest Margin |
| Pendapatan Operasional Lainnya terhadap Pendapatan Operasional | 27,31 | 26,09 | 23,09 | 27,69 | 43,54 | Other Operating Revenue to Operating Revenue |
| Beban terhadap Pendapatan (CIR) | 88,07 | 81,16 | 74,10 | 71,35 | 68,75 | Cost of Income Ratio (CIR) |
| Biaya Operasional terhadap Pendapatan Operasional (BOPO) | 90,83 | 103,36 | 93,27 | 97,12 | 111,70 | Operating Expenses to Operating Income (BOPO) |
| **Likuiditas (%)** | | | | | | **Liquidity (%)** |
| Kredit terhadap Dana Masyarakat | 32,68 | 40,94 | 41,07 | 41,22 | 56,97 | Loans to Deposit Ratio |
| Rasio Dana Murah (CASA) | 71,37 | 66,64 | 65,53 | 69,20 | 53,43 | Cash Ratio (CASA) |
| Liabilitas terhadap Ekuitas | 546,82 | 572,50 | 549,97 | 615,71 | 636,56 | Liabilities to Equity |
| Liabilitas terhadap Aset | 84,54 | 85,13 | 84,61 | 86,03 | 86,42 | Liabilities to Assets |
| **Kepatuhan (%)** | | | | | | **Compliance (%)** |
| Pelanggaran BMPK | Nil | Nil | Nil | Nil | Nil | Legal Lending Limit Violation |
| Pihak Terkait | Nil | Nil | Nil | Nil | Nil | Related Parties |
| Pihak Tidak Terkait | Nil | Nil | Nil | Nil | Nil | Unrelated Parties |
| Pelampauan BMPK | Nil | Nil | Nil | Nil | Nil | Legal Lending Limit Excess |
| Giro Wajib Minimum (GWM) – Rupiah | 12,93 | 15,22 | 10,01 | 5,30 | 4,34 | Minimum Statutory Reserves (GWM) - Rupiah |
| Giro Wajib Minimum (GWM) – Valas | 3,95 | 4,09 | 3,95 | 4,01 | 4,02 | Minimum Statutory Reserves (GWM) - Foreign Currency |
| Posisi Devisa Neto (PDN) | 1,13 | 6,57 | 0,81 | 1,11 | 0,68 | Net Open Position (NOP) |
| **Tagihan dan Liabilitas Derivatif** | | | | | | **Derivative Receivables and Liabilities** |
| Tagihan Derivatif | 1.855 | 27.502 | 6.772 | 109 | 706 | Derivative Receivables |
| Liabilitas Derivatif | 1.746 | 3.235 | 7.411 | 128 | 875 | Derivative Liabilities |

# IKHTISAR OPERASIONAL
## Operational Highlights

Rp Juta | Rp Million

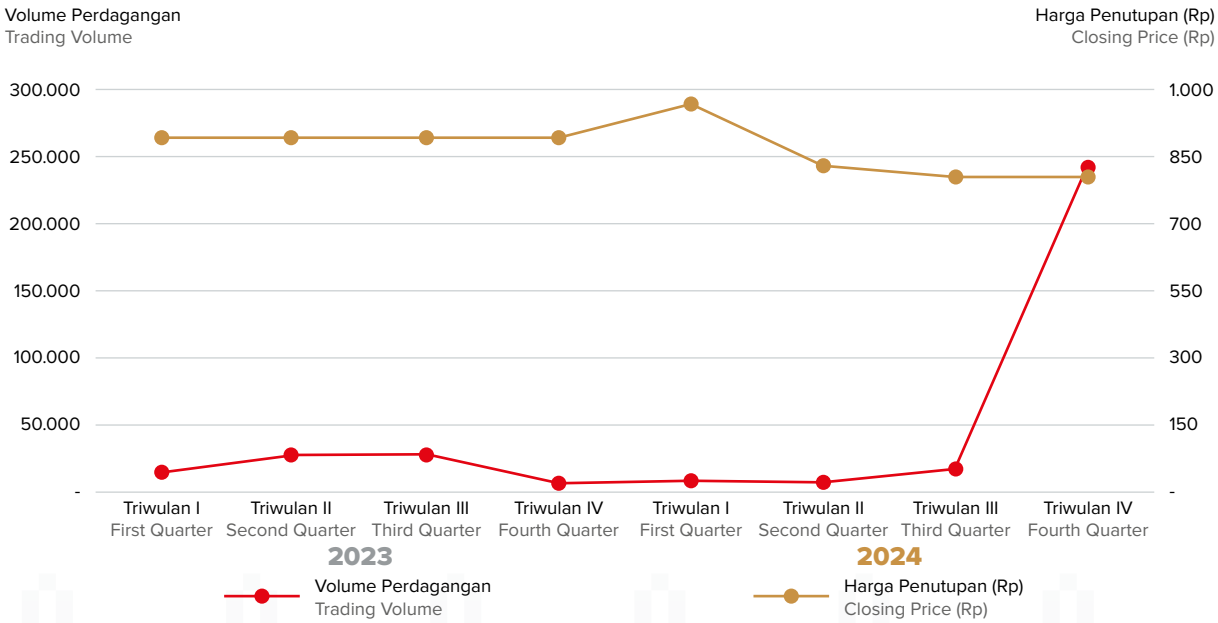
| Uraian | 2024 | 2023 | 2022 | 2021 | 2020 | Description |
|---|---|---|---|---|---|---|
| **Jenis Kredit dan Piutang/Pembiayaan Syariah** | | | | | | **Loans and Receivables/Sharia Financing Type** |
| Pinjaman Cicilan | 3.557.383 | 4.427.012 | 5.919.302 | 6.219.020 | 8.393.218 | Installment Loan |
| Pinjaman Tetap | 4.763.931 | 3.868.400 | 2.646.804 | 2.922.920 | 3.224.091 | Fixed Loan |
| Pinjaman Konsumsi | 2.395.740 | 3.084.603 | 3.344.674 | 1.909.192 | 2.156.592 | Consumer Loan |
| Piutang Syariah – Mudharabah | 312.192 | 679.725 | 1.197.441 | 583.031 | 1.230.954 | Sharia Receivables - Mudharabah |
| Piutang Syariah – Musyarakah | 2.375.665 | 3.936.659 | 1.603.796 | 3.726.232 | 2.987.939 | Sharia Receivables - Musyarakah |
| Pinjaman Anjak Piutang | - | - | - | 1.207.885 | 1.143.735 | Factoring Loan |
| Piutang Syariah – Murabahah | 335.423 | 377.007 | 281.690 | 809.950 | 678.633 | Sharia Receivables - Murabahah |
| Pinjaman Rekening Koran | 343.798 | 218.699 | 226.657 | 271.743 | 325.350 | Overdraft Loan |
| Pinjaman Karyawan | 120.872 | 105.246 | 81.994 | 87.911 | 73.987 | Employee Loan |
| Piutang Syariah – Qardh | 13.699 | 171.907 | 197.422 | 193.650 | 251.988 | Sharia Receivables - Qardh |
| Piutang Syariah – Ijarah | 209 | 2.188 | 1.184 | 242 | 9.868 | Sharia Receivables - Ijarah |
| Piutang Syariah – Ijarah Multijasa | 136.891 | - | - | - | - | Sharia Receivables - Ijarah Multijasa |
| Pinjaman Investasi | - | - | - | - | 937 | Investment Loan |
| **Jumlah** | **14.355.803** | **16.871.446** | **15.500.964** | **17.931.776** | **20.477.292** | **Total** |
| Cadangan Kerugian Penurunan Nilai | (1.549.516) | (1.686.246) | (2.121.125) | (1.617.907) | (1.598.919) | Allowance for Impairment Losses |
| **Jumlah Bersih** | **12.806.287** | **15.185.200** | **13.379.839** | **16.313.869** | **18.878.373** | **Net Total** |
| **Produk Dana Pihak Ketiga** | | | | | | **Third Party Fund Product** |
| Giro | 18.164.043 | 15.394.881 | 14.178.895 | 19.130.608 | 9.246.790 | Demand Deposit |
| Tabungan | 13.822.052 | 12.690.959 | 11.189.303 | 11.642.139 | 10.390.895 | Savings Account |
| Deposito Berjangka | 12.833.869 | 14.060.296 | 13.345.837 | 13.696.171 | 17.118.870 | Time Deposit |
| **Jumlah** | **44.819.964** | **42.146.136** | **38.714.035** | **44.468.918** | **36.756.555** | **Total** |

# IKHTISAR SAHAM
## Stock Highlights

### Perkembangan Kinerja Saham Triwulanan (2023-2024)
**Quarterly Stock Performance Development (2023-2024)**

| Periode<br>Period | Harga Tertinggi (Rp)<br>Highest Price (Rp) | Harga Terendah (Rp)<br>Lowest Price (Rp) | Harga Penutupan (Rp)<br>Closing Price (Rp) | Volume Perdagangan<br>Trading Volume | Jumlah Saham Beredar<br>Number of Outstanding Shares | Kapitalisasi Pasar<br>Market Capitalization (Rp) |
|---|---|---|---|---|---|---|
| **2024** | | | | | | |
| Triwulan I<br>Quarter I | 950 | 845 | 950 | 3.900 | 19.517.921.842 | 18.542.025.749.900 |
| Triwulan II<br>Quarter II | 955 | 760 | 840 | 2.700 | 19.517.921.842 | 16.395.054.347.280 |
| Triwulan III<br>Quarter III | 910 | 755 | 820 | 12.900 | 19.517.921.842 | 16.004.695.910.440 |
| Triwulan IV<br>Quarter IV | 880 | 615 | 820 | 243.200 | 19.517.921.842 | 16.004.695.910.440 |
| **2023** | | | | | | |
| Triwulan I<br>Quarter I | 905 | 800 | 890 | 10.400 | 19.517.921.842 | 17.370.950.439.380 |
| Triwulan II<br>Quarter II | 900 | 840 | 890 | 23.600 | 19.517.921.842 | 17.370.950.439.380 |
| Triwulan III<br>Quarter III | 1.050 | 800 | 890 | 24.100 | 19.517.921.842 | 17.370.950.439.380 |
| Triwulan IV<br>Quarter IV | 890 | 755 | 890 | 2.000 | 19.517.921.842 | 17.370.950.439.380 |

### PERGERAKAN HARGA SAHAM
**STOCK PRICE MOVEMENT**



## Aksi Korporasi

Pada tahun 2024, Bank Sinarmas tidak melakukan aksi korporasi, baik dalam bentuk pemecahan saham, penggabungan saham, dividen saham, pembagian saham bonus, maupun perubahan nilai nominal saham.

## Penghentian Sementara Perdagangan

Selama tahun 2024, Bank Sinarmas tidak menerima sanksi dari Bursa Efek Indonesia, baik berupa penghentian sementara perdagangan saham (*suspension*) dan/atau pembatalan pencatatan saham (*delisting*).

## Corporate Action

In 2024, Bank Sinarmas did not conduct any corporate actions, whether in the form of stock splits, reverse stock, stock dividends, bonus share distributions, or changes in the nominal value of shares.

## Temporary Trading Suspension

In 2024, Bank Sinarmas did not receive any sanctions from Indonesia Stock Exchange, whether in the form of temporary suspension of stock trading (suspension) and/or cancellation of stock listing (delisting).

# IKHTISAR OBLIGASI/SUKUK
## Summary of Bonds/Sukuk

Hingga akhir tahun buku 2024, daftar obligasi Bank Sinarmas yang masih beredar diuraikan dalam tabel di bawah ini:

Until the end of the 2024 financial year, the list of outstanding Bank Sinarmas bonds is outlined in the table below:

| Nama Obligasi<br>Bond Name | Tanggal Penerbitan<br>Issuing Date | Nilai Penawaran<br>Offering Value | Tingkat Bunga<br>Interest Rate | Tanggal Jatuh Tempo<br>Maturity Date | Peringkat<br>Rating | Lembaga Pemeringkat<br>Rating Agency | Bursa Saham<br>Stock Exchange |
|---|---|---|---|---|---|---|---|
| Obligasi Subordinasi Berkelanjutan I Bank Sinarmas Tahap I Tahun 2022<br>Sustainable Subordinated Bonds I Bank Sinarmas Phase I Year 2022 | 29 Juni 2022<br>June 29, 2022 | 500.000.000.000 | 6,50% | 8 Juli 2027<br>July 8, 2027 | Ir A<br>(Single A) | PT Kredit Rating Indonesia | Bursa Efek Indonesia<br>Indonesia Stock Exchange |

# PENCAPAIAN KINERJA 2024 [OJK B.1][OJK B.2][OJK B.3]
2024 Performance Achievements

## EKONOMI Economy

**PENDAPATAN OPERASIONAL**
Operating Revenues

**RP3.575 miliar** billion

3.549 miliar | billion (2023)

**LABA BERSIH**
Net Profit

**RP370 miliar** billion

76 miliar | billion (2023)

**PERSENTASE JUMLAH KREDIT/PEMBIAYAAN KEGIATAN USAHA BERKELANJUTAN TERHADAP JUMLAH KREDIT/ PEMBIAYAAN BANK**
Percentage of Total Loans/Financing of Sustainable Business Activities to Total Loans/ Financing of the Bank

**16,07 %**

13,82 % (2023)

**PELIBATAN PIHAK LOKAL**
Local Party Engagement

**9.695 agen laku pandai**
laku pandai agents

9.260 agen laku pandai | laku pandai agents (2023)

## LINGKUNGAN Environment

**PENGGUNAAN ENERGI**
Energy Usage

**1.993,94 GJ**

1.542,80 GJ (2023)

**EMISI YANG DIHASILKAN**
Emissions Generated

**416,50 Ton$CO_2$ eq**

318,20 Ton$CO_2$ eq (2023)

**PEMAKAIAN AIR**
Water Usage

**RP36,16 juta** million

39,73 juta | million (2023)

**LIMBAH KERTAS**
Waste Paper

**4,53 ton** tons

3,75 ton | tons (2023)

## SOSIAL Social

**JUMLAH JAM PELATIHAN KARYAWAN BANK SINARMAS 2024**
Total Training Hours of Bank Sinarmas Employees 2024

**445.707,52 jam**
hours

406.645,51 jam | hours (2023)

**RATA-RATA JAM PELATIHAN PER KARYAWAN 2024**
Average Employee Training Hours 2024

**91,48 jam/karyawan**
hours/employee

76,78 jam | hours (2023)

**REALISASI BIAYA TJSL SOSIAL KEMASYARAKATAN DAN PENDIDIKAN**
Realization of TJSL Costs for Social Community and Education

**RP1.972,77 juta**
million

2.640 juta | million (2023)

# PERISTIWA PENTING
## Event Highlights

### 01 2 JANUARI / JANUARY 2, 2024

Spin Off Nanobank
Spin Off Nanobank

### 02 16 MEI / MAY 16, 2024

Rapat Umum Pemegang Saham Tahunan Bank Sinarmas
Annual General Meeting of Shareholders of Bank Sinarmas

### 03 19 JULI / JULY 19, 2024

Penandatanganan Perjanjian Kerja Sama antara KSEI dengan 23 Bank Administrator RDN-Bank Pembayaran periode 2024-2029
Signing of Cooperation Agreement between KSEI and 23 RDN Administrator Banks-Payment Banks for the period of 2024-2029

### 04 2 AGUSTUS / AUGUST 2, 2024

Kerjasama Quick Response Code Indonesian Standard (QRIS) antara Bank Sinarmas dan ALTO
Cooperation of Quick Response Code Indonesian Standard (QRIS) between Bank Sinarmas and ALTO

### 05 6 AGUSTUS / AUGUST 6, 2024

Penandatanganan Perjanjian Fasilitas Pinjaman Telkomsel
Signing Ceremony of Telkomsel Loan Facility Agreement

### 06 30 AGUSTUS / AUGUST 30, 2024

Penandatanganan Perjanjian Kerja Sama Antara PLN, PLN Icon Plus dengan Bank dan Pos Tentang Pengelolaan Dana atas Penyesuaian Sistem P2APST
Signing of Cooperation Agreement between PLN, PLN Icon Plus with Banks and Posts Regarding Fund Management for P2APST System Adjustment

### 07 28 OKTOBER / OCTOBER 28, 2024

Rapat Umum Pemegang Saham Luar Biasa Bank Sinarmas
Extraordinary General Meeting of Shareholders of Bank Sinarmas

### 08 26 NOVEMBER / NOVEMBER 26, 2024

Paparan Publik Bank Sinarmas 2024
Public Expose Bank Sinarmas 2024


01


02
Rapat Umum Pemegang Saham Tahunan (RUPST)
PT. Bank Sinarmas Tbk.


03


04


05
bank sinarmas Telkomsel
Loan Facility Agreement


06


07
RAPAT UMUM PEMEGANG SAHAM LUAR BIASA
("RUPSLB")


08
PUBLIC EXPOSE
PT. BANK SINARMAS Tbk.

# PENGHARGAAN DAN SERTIFIKASI
## Awards and Certifications

### PENGHARGAAN
Awards




**1 April** / April 1, 2024

**The Best Mobile Banking Bank Umum Konvensional 2024**
The Best Mobile Banking for Conventional Commercial Banks 2024

**Penyelenggara** / Organizer
Infobank




**1 April** / April 1, 2024

**The Best Internet Banking Bank Umum Konvensional 2024**
The Best Internet Banking for Conventional Commercial Banks 2024

**Penyelenggara** / Organizer
Infobank




**1 April** / April 1, 2024

**The Best Credit Card Bank Umum Konvensional 2024**
The Best Credit Card for Conventional Commercial Banks 2024

**Penyelenggara** / Organizer
Infobank




**1 April** / April 1, 2024

**The Best KPR Bank Umum Konvensional 2024**
The Best Mortgage for Conventional Commercial Banks 2024

**Penyelenggara** / Organizer
Infobank




**1 April** / April 1, 2024

**The 2nd Best Tabungan Bank Umum Konvensional 2024**
The 2nd Best Savings Account of Conventional Commercial Bank 2024

**Penyelenggara** / Organizer
Infobank




**1 April** / April 1, 2024

**The 2nd Best Debit Card Bank Umum Konvensional 2024**
The 2nd Best Debit Card Conventional Commercial Bank 2024

**Penyelenggara** / Organizer
Infobank




**1 April** / April 1, 2024

**The 3rd Best Bank Umum Konvensional 2024**
The 3rd Best Conventional Commercial Bank of 2024

**Penyelenggara** / Organizer
Infobank



**1 Juni** / June 1, 2024

**The Most 500 Outstanding Women 2024**
The Most 500 Outstanding Women 2024

**Penyelenggara** / Organizer
Infobank




**20 Juni** / June 20, 2024

**5th Indonesia Top Bank Awards 2024**
5th Indonesia Top Bank Awards 2024

**Penyelenggara** / Organizer
Iconomics




**25 Juni** / June 25, 2024

**Top 100 Indonesia Inspiring Women Award 2024**
100 Most Inspiring Women of Indonesia 2024

**Penyelenggara** / Organizer
Peluang




**2 Juli** / July 2, 2024

**The 1st Branch ATM Bank Umum Konvensional 2024**
First Branch ATM of Conventional Commercial Bank 2024

**Penyelenggara** / Organizer
Infobank




**2 Juli** / July 2, 2024

**The 2nd Best Live Chat Bank Umum Konvensional 2024**
The 2nd Best Live Chat Conventional Commercial Bank 2024

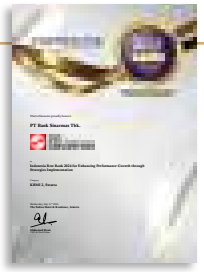
**Penyelenggara** / Organizer
Infobank



**19 Juli** / July 19, 2024

**Human Resources Excellence Awards 2024**
The Best Excellence in Work - Life Harmony

**Penyelenggara** / Organizer
HumanResources



**31 Juli** / July 31, 2024

**Indonesia Best Bank 2024 for Enhancing Performance Growth through Strategies Implementation**
Indonesia Best Bank 2024 for Enhancing Performance Growth through Strategy Implementation

**Penyelenggara** / Organizer
Warta Ekonomi



**8 Agustus** / August 8, 2024

**Smartfren Appreciation & Collaboration Day 2024: Best Innovative Technology Integration**
Smartfren Appreciation & Collaboration Day 2024: Best Innovative Technology Integration

**Penyelenggara** / Organizer
Smartfren for Business



**8 Agustus** / August 8, 2024

**Smartfren Appreciation & Collaboration Day 2024: Best Business Productivity Transformation**
Smartfren Appreciation & Collaboration Day 2024: Best Business Productivity Transformation

**Penyelenggara** / Organizer
Smartfren for Business




**5 September** / September 5, 2024

**Asian Technology Excellence Awards 2024 - Indonesia Technology Excellence Award for Automation - MSME Loan Origination System**
Asian Technology Excellence Awards 2024 - Indonesia Technology Excellence Award for Automation - MSME Loan Origination System

**Penyelenggara** / Organizer
The Asian Business Review




**5 September** / September 5, 2024

**Asian Technology Excellence Awards 2024 - Indonesia Technology Excellence Award for Mobile - SimobiPlus Revamp**
Asian Technology Excellence Awards 2024 - Indonesia Technology Excellence Award for Mobile - SimobiPlus Revamp

**Penyelenggara** / Organizer
The Asian Business Review

## PENGHARGAAN
Awards




**11 Oktober** / October 11, 2024

**The Best Indonesia Annual Report Award 2024 - Platinum Award (A)(Very Excellent) (5 Stars *****)**
The Best Indonesia Annual Report Award 2024 - Platinum Award (A)(Very Excellent) (5 Stars *****)

**Penyelenggara** / Organizer
Economic Review




**19 November** / November 19, 2024

**Linkedin Talent Awards 2024**
The Best Talent Acquisition Team

**Penyelenggara** / Organizer
LinkedIn



**24 November** / November 24, 2024

**Techconnect Excellence Award 2024**
The 1st Winner of Excellence in Creating Leaders and Its Development Pipeline

**Penyelenggara** / Organizer
Techconnect



**26 November** / November 26, 2024

**Indonesia Client Appreciation Night 2024 - Outstanding Corporate Card Volume**
Indonesia Client Appreciation Night 2024 - Outstanding Corporate Card Volume

**Penyelenggara** / Organizer
VISA




**29 November** / November 29, 2024

**TOP 100 CEO & 200 Future Leaders Forum 2024 - HOW GREAT LEADER CREATES MORE LEADERS**
TOP 100 CEO & 200 Future Leaders Forum 2024 - HOW GREAT LEADER CREATES MORE LEADERS

**Penyelenggara** / Organizer
Infobank

## SERTIFIKASI
Certification




**Masa Berlaku** / Validity Period
12 Maret 2023-11 Maret 2026 / March 12, 2023-March 11, 2026

**ISO 27001: Sistem Manajemen Keamanan Informasi pada Layanan Mobile Banking SimobiPlus*), Internet Banking (Personal & Corporate)*), Pega System CS*), & Pega Loan Origination System (LOS)**
ISO 27001: Information Security Management System for Mobile Banking Services Simobiplus*), Internet Banking (Personal & Corporate)*), Pega System CS*), & Pega Loan Origination System (LOS)

**Penyelenggara** / Organizer
Bureau Veritas



# LAYANAN PRIORITAS: SOLUSI BERKELANJUTAN BAGI ENTREPRENEURS INDONESIA

## **Priority Banking**: Lifetime Banking Solutions for Indonesia's Entrepreneurs

Dalam rangka memperkuat komitmen sebagai mitra strategis para *entrepreneurs* Indonesia, khususnya di kota-kota *Tier* 2 dan 3, Bank Sinarmas terus mengembangkan layanan **Perbankan Prioritas** sebagai *one-stop solution* dan bentuk nyata dari konsep **"*Lifetime Banking for Entrepreneurs*."** Dengan fokus pada:

In strengthening its commitment as a strategic partner for Indonesian entrepreneurs, particularly in Tier 2 and Tier 3 cities, Bank Sinarmas continues to develop its **Priority Banking** services as a one-stop solution and a tangible representation of the **"Lifetime Banking for Entrepreneurs"** concept. With primary focus on:

**Membangun kepercayaan dan keamanan finansial dalam ekosistem konglomerasi**
Building trust and financial security within the conglomerate ecosystem

**Memberikan akses ke pengetahuan, produk investasi, dan peluang usaha yang dapat dimanfaatkan oleh para nasabah prioritas**
Providing access to knowledge, investment products, and business opportunities

## Highlight Program & Benefits 2025
## Highlights of Program & Benefits for 2025

Di tahun 2025, Bank Sinarmas mengaktivasi sejumlah program strategis untuk mendukung pertumbuhan aset dan loyalitas nasabah prioritas, antara lain:

In 2025, Bank Sinarmas will activate a series of strategic programs to support asset growth and customer loyalty, including:

***Member Get Member* (MGM)** – Program referensi eksklusif yang mendorong nasabah prioritas untuk mengajak keluarga, kolega, dan rekan usaha bergabung sebagai nasabah prioritas, dengan hadiah menarik sebagai bentuk apresiasi.

**Member Get Member (MGM)** – An exclusive referral program encouraging priority customers to invite family, colleagues, and business partners to join as priority customers, with attractive rewards as a form of appreciation.

**Bebas Biaya Transfer** – Fasilitas transaksi bebas biaya *antarbank*, RTGS, dan SKN bagi nasabah prioritas melalui kanal *digital* Simobi+, guna mendukung efisiensi transaksi pribadi maupun bisnis.

**Free Transfer Fees** – Fee-free for transactions between banks, RTGS, and SKN for priority customers through the Simobi+ digital channel, supporting both personal and business transaction efficiency.

**Simas Diamond Card & Red Diamond Infinite Card** – Kartu debit dan kartu kredit khusus prioritas dengan akses ke *airport lounge*, perlindungan asuransi perjalanan, dan benefit eksklusif lainnya.

**Simas Diamond Card & Red Diamond Infinite Card** – Exclusive debit and credit cards for priority customers with access to airport lounges, travel insurance protection, and other exclusive benefits.

***Consolidated e-Statement*** – Inovasi *digital* dalam bentuk laporan keuangan terintegrasi yang memudahkan nasabah memantau seluruh portofolio (simpanan dan pinjaman) dan transaksi dalam satu tampilan ringkas, aman, dan dapat diakses kapan saja.

**Consolidated e-Statement** – A digital innovation in the form of an integrated financial statement that allows customers to monitor their entire portfolio (savings and loans) and transactions in one concise, secure, and accessible view at any time.

***Education Assistance*** – Layanan konsultasi perencanaan dana pendidikan untuk anak-anak nasabah prioritas, termasuk simulasi kebutuhan biaya dan rekomendasi produk keuangan yang sesuai.

**Education Assistance** – Consultation services for planning educational funds for priority customers' children, including cost simulations and recommendations for suitable financial products.

***Exclusive Event*** – Rangkaian acara eksklusif seperti *private viewing luxury brand* dan *intimate customer gathering* diadakan secara rutin sebagai wadah interaksi antara nasabah dan ekosistem bisnis Bank Sinarmas.

**Exclusive Event** – A series of exclusive events, such as private luxury brand viewings and intimate customer gatherings, held regularly to foster interaction between customers and the Bank Sinarmas business ecosystem.

***Festive Gift*** – Program *seasonal reward* yang dirancang untuk mempererat hubungan emosional dengan nasabah melalui pemberian hadiah spesial pada momen-momen istimewa seperti Imlek, Lebaran, dan Natal.

**Festive Gift** – A seasonal reward program designed to strengthen emotional bonds with customers by offering special gifts during significant occasions such as Chinese New Year, Eid, and Christmas.

## Peningkatan Infrastruktur & Jangkauan
## Infrastructure Improvement & Reach Expansion

Untuk memperluas cakupan layanan prioritas, Bank Sinarmas meluncurkan cabang prioritas baru di Sinar Mas Land Plaza, Jakarta Pusat. Cabang ini merupakan kantor cabang prioritas kedua setelah sebelumnya dibuka di Agora Mall. Ini merupakan bagian dari strategi ekspansi layanan ke area dengan potensi nasabah yang membutuhkan layanan *entrepreneurial banking* di kota besar.

To expand the coverage of its priority services, Bank Sinarmas has launched a new priority branch at Sinar Mas Land Plaza, Central Jakarta. This branch is the second priority branch, following the opening at Agora Mall. This is part of the service expansion strategy targeting areas with a potential customer base requiring entrepreneurial banking services in large cities.

Fasilitas unggulan meliputi:

Key facilities include:

***One Stop Banking Service***
One-stop Banking Service

**Ruang Tunggu VIP**
VIP Waiting Area

**Ruang *Meeting/ Dealing* Eksklusif**
Exclusive Meeting/Dealing Rooms



## Kontribusi terhadap Strategi Jangka Panjang
## Contribution to Long-Term Strategy

Melalui pengembangan layanan prioritas, Bank Sinarmas berkontribusi terhadap pencapaian strategi jangka panjang ***"Unlocking Entrepreneurial Banking Potential"***, yang berfokus pada:

Through the development of priority services, Bank Sinarmas contributes to the achievement of the long-term strategy **"Unlocking Entrepreneurial Banking Potential,"** which focuses on:

**Membangun sistem keuangan yang kuat dan inklusif**
Building a strong and inclusive financial system

**Meningkatkan literasi keuangan dan akses terhadap usaha**
Enhancing financial literacy and business access

**Memperluas inklusi layanan perbankan ke kota-kota berkembang**
Expanding banking service inclusion to emerging cities

## Jadikan setiap kebutuhan tak lagi menyulitkan, nikmati keistimewaan menjadi Nasabah Prioritas.

Make every need effortless, experience the privilege of being a Priority Customer.



# LAPORAN MANAJEMEN
## Management Report



.02

# LAPORAN DEWAN KOMISARIS
## Board of Commissioner's Report





**TJENDRAWATI WIDJAJA**
**Komisaris Utama**
President Commissioner

**Pemegang Saham dan Pemangku Kepentingan yang Terhormat,**

Puji dan syukur sepatutnya kita panjatkan kepada Tuhan Yang Maha Kuasa, karena PT. Bank Sinarmas Tbk. ("Bank Sinarmas", "Bank") mampu melalui tahun buku 2024 dengan hasil usaha yang baik. Melalui laporan ini, Dewan Komisaris menyampaikan pelaksanaan tugas dan fungsi yang merupakan bagian dari pelaksanaan peraturan perundang-undangan terkait tugas dan tanggung jawab Dewan Komisaris, sekaligus wujud transparansi dan keterbukaan informasi Bank.

Mengacu pada regulasi, tugas utama Dewan Komisaris adalah melakukan pengawasan dan memberikan nasihat kepada Direksi terkait dengan pengelolaan kegiatan usaha Bank.

**Dear Valued Shareholders and Stakeholders,**

Praise and gratitude to God Almighty for allowing PT. Bank Sinarmas Tbk. ("Bank Sinarmas" or "the Bank") to complete the fiscal year 2024 with strong business results. Through this report, the Board of Commissioners would like to convey the implementation of duties and functions that are part of the implementation of laws and regulations related to the Board of Commissioners' duties and responsibilities, as well as a form of transparency and openness of Bank information.

According to the regulations, the primary function of the Board of Commissioners is to oversee and advise the Board of Directors on the management of the Bank's business activities. These

**Pencapaian yang telah direalisasikan oleh manajemen pada tahun 2024 akan semakin membuka peluang bagi Bank untuk terus berkembang.**

The achievements Management delivered in 2024 will open up opportunities for the Bank to thrive even further.



Peraturan perundang-undangan yang melandasi ketentuan tersebut, antara lain Undang-Undang Perseroan Terbatas Nomor 40 tahun 2007 tentang Perseroan Terbatas. Selain itu, Peraturan Otoritas Jasa Keuangan (POJK) Nomor 33/POJK.04/2014 tentang Direksi dan Dewan Komisaris Emiten atau Perusahaan Publik.

Dewan Komisaris menyadari bahwa tahun buku 2024 masih penuh dengan tantangan. Perekonomian global dan nasional bergerak dalam tekanan, bahkan negara-negara maju masih mempertahankan suku bunga yang relatif tinggi demi meredam inflasi agar perekonomiannya tetap bergerak positif.

Kondisi eksternal yang bergerak dinamis membutuhkan respons cepat dan tepat sehingga kinerja Bank tidak terdampak negatif dari perkembangan eksternal yang terjadi. Semua itu dilakukan dengan baik oleh Direksi serta organisasi di bawahnya, sehingga Bank Sinarmas mampu beradaptasi dan menghasilkan kinerja yang positif hingga akhir tahun buku.

## Penilaian atas Kinerja Direksi terkait Pengelolaan Bank

Dalam memberikan penilaian terhadap kinerja Direksi, Dewan Komisaris berpedoman pada Rencana Bisnis Bank (RBB) yang telah disusun Direksi serta disetujui oleh Dewan Komisaris. RBB tersebut juga disampaikan kepada regulator, yaitu Otoritas Jasa Keuangan (OJK). Pada saat bersamaan, Dewan Komisaris mempertimbangkan perkembangan situasi yang terjadi, terutama akibat kondisi eksternal.

Dengan pertimbangan tersebut, Dewan Komisaris memandang bahwa secara keseluruhan pada tahun 2024, Direksi telah menjalankan tugas dan tanggung jawab dengan sangat baik dan berhasil membawa Bank Sinarmas pada hasil yang positif. Dewan Komisaris memberikan

provisions are supported by laws and regulations such as Law No. 40 of 2007 on Limited Liability Companies and Financial Services Authority Regulation (POJK) Number 33/POJK.04/2014 on the Board of Directors and Board of Commissioners of Issuers or Public Companies.

The Board of Commissioners recognizes that the fiscal year 2024 remains challenging. The global and national economies were under pressure; even developed countries maintained relatively high interest rates to reduce inflation and keep their economies moving forward.

Dynamic external conditions necessitate a prompt and precise response to ensure that external developments do not have a negative impact on the Bank's performance. All of this was accomplished effectively by the Board of Directors and the organizations below it, allowing Bank Sinarmas to adapt and produce positive results until the end of the fiscal year.

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

The Bank Business Plan (RBB), prepared by the Board of Directors and approved by the Board of Commissioners, serves as the primary guide in assessing the performance of the Board of Directors. The RBB is also sent to the regulator, the Financial Services Authority (OJK). At the same time, the Board of Commissioners considers how the situation evolves, particularly in light of external conditions.

With these considerations, the Board of Commissioners views that overall in 2024, the Board of Directors has performed its duties and responsibilities very well and succeeded in bringing Bank Sinarmas to positive results. The Board of Commissioners

apresiasi kepada Direksi yang telah menerapkan strategi dan kebijakan strategis dengan tepat sehingga Bank Sinarmas dapat merespons perkembangan eksternal dengan baik.

Dari sisi keuangan, Bank berhasil membukukan laba bersih sebesar Rp370 miliar, lebih tinggi 388,33% dibandingkan tahun 2023 yang sebesar Rp76 miliar. Kinerja laba tersebut, terutama ditopang oleh pertumbuhan pendapatan bunga dan pendapatan operasional di luar bunga.

Selain itu, secara fundamental, permodalan Bank juga semakin kuat, seperti ditunjukkan melalui rasio Kewajiban Penyediaan Modal Minimum (KPMM) yang membaik. Jika pada tahun 2023 sebesar 25,34%, di tahun 2024 naik menjadi 30,46%.

Dari sisi operasional, perbaikan juga dapat dilihat dari rasio Biaya Operasional terhadap Pendapatan Operasional (BOPO) yang pada tahun 2023 sebesar 103,36%, turun menjadi 90,83% pada tahun 2024.

Peluang Bank untuk mencapai obyektif jangka panjang yaitu menjadi *payment and transaction bank*, semakin terbuka, dengan terjadinya peningkatan pada rasio dana murah (*Current Account Saving Account*/CASA) yang pada tahun 2024 menjadi 75,88%, dari 72,42% di tahun sebelumnya.

## Pengawasan Dewan Komisaris dalam Perumusan dan Implementasi Strategi Bank

Sebagai bagian dari pelaksanaan fungsi pengawasan, Dewan Komisaris terlibat aktif sejak dari perumusan hingga implementasi strategi dan kebijakan strategis Bank. Untuk perumusan target dan strategi usaha yang disampaikan melalui RBB, Dewan Komisaris memberikan persetujuan setelah melalui analisis dan pembahasan bersama Direksi.

Pada tahap implementasi, pola pengawasan yang dilakukan oleh Dewan Komisaris, antara lain melalui rapat gabungan bersama Direksi. Selain itu, komite-komite di bawah Dewan Komisaris juga memiliki peran pengawasan, yang hasilnya disampaikan sebagai masukan bagi Dewan Komisaris dalam memberikan rekomendasi.

Dewan Komisaris turut memastikan strategi yang telah dirumuskan oleh Direksi selaras dengan visi dan misi Bank, serta dapat menghadapi tantangan dan peluang yang ada di lingkungan bisnis. Selain itu, strategi yang dijalankan oleh Bank telah mempertimbangkan prinsip kehati-hatian dan berkelanjutan, sehingga dapat memberikan manfaat jangka panjang bagi Bank dan para pemangku kepentingan.

gives appreciation to the Board of Directors for implementing strategic strategies and policies appropriately so that Bank Sinarmas can respond well to external developments.

Financially, the Bank achieved a net profit of Rp370 billion, which is 388.33% higher than the Rp76 billion earned in 2023. This profit performance was primarily driven by an increase in interest interest income and non-interest operating income.

Furthermore, the Bank's capital is becoming stronger, as evidenced by the improving ratio of the Capital Adequacy Ratio. In 2023, it was 25.34%, and in 2024, it rose to 30.46%.

From an operational standpoint, improvements can also be seen from the ratio of Operating Expenses to Operating Income (BOPO) which in 2023 amounted to 103.36%, falling to 90.83% in 2024.

The Bank's opportunity to achieve its long term objective of becoming a payment and transaction bank has increased, with the Current Account Saving Account (CASA) increasing to 75.88% in 2024 from 72.42% the previous year.

## The Board of Commissioners' Supervision in Formulating and Implementing Bank Strategies

As part of the supervisory function, the Board of Commissioners is actively involved in the development and implementation of the Bank's strategies and policies. The Board of Commissioners approves business targets and strategies conveyed through the RBB after analysis and discussion with the Board of Directors.

In the implementation stage, the Board of Commissioners' supervisory pattern includes, among others, joint meetings with the Board of Directors. Furthermore, the committees under the Board of Commissioners have a supervisory role, with the results submitted as input to the Board of Commissioners for recommendations.

The Board of Commissioners also ensures that the strategies developed by the Board of Directors are consistent with the Bank's vision and mission, and that they can meet the challenges and opportunities of the business environment. Furthermore, the Bank's strategies have taken into account the principles of prudence and sustainability, ensuring long-term benefits for the Bank and its stakeholders.

**Bank Sinarmas mendapatkan nilai dengan kategori "Baik" dalam penerapan GCG, berdasarkan penilaian yang dilakukan secara mandiri. Kondisi ini akan terus dijaga dan dipertahankan ke depannya.**

Bank Sinarmas received a score of “Good” category in the implementation of GCG, based on the assessment conducted independently. This condition will continue to be maintained in the future.

Dewan Komisaris juga melakukan pengawasan terhadap berbagai kegiatan Bank yang berkaitan dengan pengelolaan risiko, baik risiko keuangan maupun risiko non-keuangan. Hal ini dilakukan untuk memastikan bahwa Bank dapat mengelola risiko dengan baik, sehingga dapat mencapai tujuan bisnis secara optimal. Dalam mengawasi implementasi strategi, Dewan Komisaris juga berperan dalam memastikan bahwa Bank menjalankan kegiatan bisnis sesuai dengan prinsip tata kelola perusahaan yang baik dan berkelanjutan, sehingga dapat memperoleh kepercayaan dari para pemangku kepentingan.

Dari hasil pengawasan yang dilakukan, Dewan Komisaris berpandangan bahwa Direksi telah merumuskan strategi serta mengimplementasikannya dengan sangat baik. Karena itu, Dewan Komisaris memberikan apresiasi kepada Direksi.

## Frekuensi dan Cara Pemberian Nasihat kepada Direksi

Sepanjang tahun buku, Dewan Komisaris telah melakukan rapat dengan Direksi sebanyak 11 kali. Beberapa agenda yang dibahas, antara lain mencakup kinerja yang telah dicapai oleh Direksi.

Rapat-rapat tersebut merupakan wadah penting bagi Dewan Komisaris untuk memberikan nasihat dan arahan kepada Direksi terkait berbagai kebijakan dan strategi Bank. Dewan Komisaris secara aktif memberikan masukan dan evaluasi terhadap kinerja Direksi serta memberikan pandangan terkait situasi ekonomi dan industri perbankan yang relevan.

Selain memantau, Dewan Komisaris juga memberikan nasihat kepada Direksi. Hal itu dilakukan melalui rekomendasi, baik secara langsung dalam rapat Dewan Komisaris dengan Direksi maupun melalui komite di bawah Dewan Komisaris.

Pemberian nasihat oleh Dewan Komisaris kepada Direksi juga dapat dilakukan di luar rapat. Dewan Komisaris mendapatkan masukan dari komite-komite yang merupakan organ pendukung pelaksanaan tugas dan fungsi Dewan Komisaris dan hasilnya berupa rekomendasi yang disampaikan kepada Direksi.

## Pandangan atas Prospek Usaha yang Disusun oleh Direksi

Perekonomian global pada 2025 diperkirakan menghadapi tantangan besar akibat ketidakpastian yang meningkat, terutama dampak perang tarif antara Amerika Serikat dan China. Hal ini memperburuk prospek ekonomi dunia yang hanya diperkirakan

The Board of Commissioners also oversees various Bank risk management activities, both financial and non-financial risks, to ensure that the Bank can effectively manage risks and achieve its business objectives. In addition to supervising the strategy’s implementation, the Board of Commissioners ensures that the Bank conducts business activities in accordance with the principles of good and sustainable corporate governance, allowing it to gain stakeholders’ trust.

Based on the results of the supervision, the Board of Commissioners believes that the Board of Directors formulated and implemented the strategy effectively. Thus, the Board of Commissioners expresses its gratitude to the Board of Directors.

## Frequency and Procedures for Providing Advice to the Board of Directors

Throughout the fiscal year, the Board of Commissioners organized 11 meetings with the Board of Directors. Several agendas discussed include, among others, the performance achieved by the Board of Directors.

These meetings provided valuable opportunities for the Board of Commissioners to advise and guide the Board of Directors on various corporate policies and strategies. The Board of Commissioners actively provides feedback and evaluations on the Board of Directors’ performance, as well as insights into current economic and banking industry conditions.

In addition to monitoring, the Board of Commissioners also provides advice to the Board of Directors. This is done through recommendations, either directly in meetings of the Board of Commissioners with the Board of Directors or through committees under the Board of Commissioners.

The Board of Commissioners can provide advice to the Board of Directors outside of meetings. The Board of Commissioners receives input from committees that support organs in carrying out the Board of Commissioners’ duties and functions, and the results are presented to the Board of Directors as recommendations.

## Business Prospects Views Prepared by the Board of Directors

The global economy in 2025 is expected to face major challenges due to increasing uncertainty, especially the impact of the tariff war between the United States and China. This worsens the

tumbuh 3,3% pada 2025 (IMF), lebih rendah dari rata-rata pertumbuhan global dalam 10 tahun terakhir yang mencapai 3,7%.

Meski menghadapi tekanan global seperti volatilitas harga komoditas, pelemahan Rupiah dan pelambatan permintaan dari negara mitra dagang, perekonomian Indonesia menunjukkan ketahanan yang cukup baik. World Bank memperkirakan Indonesia akan tumbuh 5,1% pada tahun 2025. Indikator fundamental ekonomi Indonesia juga tercatat lebih kuat dalam menghadapi gejolak global. Sektor perbankan diperkirakan tetap resilient berkat kebijakan moneter yang akomodatif dan stabilitas sistem keuangan yang terjaga serta peluang digitalisasi untuk mempercepat inklusi keuangan dan efisiensi operasional. Meskipun tantangan global berlanjut, sektor perbankan Indonesia memiliki potensi besar untuk tumbuh dengan fokus pada penguatan ekonomi dalam negeri dan peningkatan kualitas layanan.

Memahami hal ini, kami menilai prospek usaha yang disusun Direksi sebagaimana yang tertuang dalam Rencana Korporasi dan Rencana Bisnis Bank (RBB) serta Rencana Aksi Keuangan Berkelanjutan (RAKB) 2024- 2028 telah dirancang dengan cermat dan realistis. Strategi ini mencerminkan komitmen untuk mengoptimalkan peluang digitalisasi, memperkuat manajemen risiko dan pengendalian internal, serta memastikan kelangsungan bisnis Bank yang berkelanjutan dan bertanggung jawab.

Kami juga memandang Direksi perlu untuk terus secara proaktif mengantisipasi risiko yang timbul dari dinamika politik, ekonomi, dan pasar keuangan global dengan mengadopsi strategi manajemen risiko yang lebih tangguh, memperkuat portofolio bisnis, serta memperluas diversifikasi produk dan layanan guna memastikan stabilitas dan pertumbuhan yang berkelanjutan.

## Pandangan atas Penerapan Tata Kelola Perusahaan yang Baik

Dewan Komisaris memandang bahwa penerapan prinsip tata kelola yang baik (*Good Corporate Governance*/GCG) sangat penting bagi Bank untuk menciptakan fundamental usaha yang kokoh demi menjaga kesinambungan usaha Bank. Perbankan merupakan bisnis di sektor jasa keuangan yang menjadikan kepercayaan para pemangku kepentingan sebagai landasan dalam bisnis.

Mengacu pada pedoman kerja, Dewan Komisaris wajib memastikan penerapan tata kelola yang baik (*Good Corporate Governance*/GCG) terselenggara dalam setiap kegiatan usaha Bank pada seluruh tingkatan atau jenjang organisasi. Dalam pelaksanaannya, selain melakukan pemantauan, Dewan Komisaris juga melakukan evaluasi dan penilaian terhadap beberapa indikator penerapan GCG secara berkala.

Indikator penilaian yang utama mencakup berbagai aspek, seperti kepatuhan terhadap peraturan dan perundang-undangan yang berlaku, transparansi dalam pengambilan keputusan, akuntabilitas dari organ tata kelola, serta ketaatan terhadap prinsip-prinsip etika dan integritas. Dewan Komisaris juga memeriksa dan menilai struktur organisasi, sistem pengendalian internal dan manajemen risiko, serta keberlanjutan dari program peningkatan kualitas GCG yang ditetapkan dalam *roadmap* tata kelola Bank.

outlook for the world economy, which is only projected to grow by 3.3% in 2025 (IMF), lower than the average global growth in the last 10 years of 3.7%.

Despite global pressures such as commodity price volatility, a weakening Rupiah, and slowing demand from trading partners, the Indonesian economy has demonstrated impressive resilience. The World Bank predicts that Indonesia's economy will expand by 5.1% in 2025. Indonesia's fundamental economic indicators have also been recorded as stronger in the face of global turmoil. The banking sector is expected to remain resilient as a result of accommodative monetary policy and continued financial system stability, as well as opportunities for digitalization to accelerate financial inclusion and operational efficiency. Despite ongoing global challenges, the Indonesian banking sector has significant potential for growth, with a focus on strengthening the domestic economy and improving service quality.

Understanding this situation, we assess that the business prospects prepared by the Board of Directors as stated in the Corporate Plan and Bank Business Plan (RBB) and the 2024-2028 Sustainable Finance Action Plan (RAKB) have been designed carefully and realistically. This strategy reflects a commitment to optimizing digitalization opportunities, strengthening risk management and internal control, as well as ensuring the continuity of the Bank's sustainable and responsible business.

We also consider that the Board of Directors needs to continue to proactively anticipate risks arising from global political, economic, and financial market dynamics by adopting a more robust risk management strategy, strengthening the business portfolio, and expanding product and service diversification to ensure stability and sustainable growth.

## Views on the Implementation of Good Corporate Governance

The Board of Commissioners believes that implementing good corporate governance (GCG) principles is important for the Bank in order to build a solid business foundation and ensure the Bank's continued operations. Banking is a financial services business that relies on stakeholder trust to operate.

According to the work guidelines, the Board of Commissioners is responsible for ensuring that good corporate governance (GCG) is implemented in all of the Bank's business activities at all levels. In addition to monitoring, the Board of Commissioners periodically evaluates and assesses a number of GCG implementation indicators.

The main assessment indicators cover various aspects, such as compliance with applicable laws and regulations, transparency in decision-making, accountability of governance organs, and adherence to principles of ethics and integrity. The Board of Commissioners also examines and assesses the organizational structure, internal control systems, and risk management, as well as the sustainability of the GCG quality improvement programs established in the Bank's governance roadmap.

Pada tahun 2024, penilaian penerapan GCG Bank Sinarmas dilakukan secara mandiri (*self assessment*). Hasilnya, Bank mendapatkan nilai dengan kategori "Baik". Kondisi ini akan terus dijaga dan dipertahankan kedepannya.

In 2024, Bank Sinarmas conducted an independent GCG self-assessment. As a result, the Bank received a "Good" rating. This condition will be maintained and preserved in the future.

## Pandangan atas Penerapan Tanggung Jawab Sosial dan Lingkungan Baik

Bank Sinarmas menyadari bahwa setiap kegiatan usaha berpotensi memberikan pengaruh kepada pemangku kepentingan, baik secara langsung maupun tidak langsung. Oleh karena itu, Bank Sinarmas memiliki tanggung jawab untuk memberikan kontribusi, baik secara ekonomi, sosial, maupun lingkungan kepada para pemangku kepentingan, yang diwujudkan melalui pelaksanaan program Tanggung Jawab Sosial dan Lingkungan (TJSL).

## Views on the Implementation of Good Social and Environmental Responsibility

Bank Sinarmas realizes that every business activity has the potential to impact stakeholders, both directly and indirectly. Therefore, Bank Sinarmas has a responsibility to provide contributions economically, socially, and environmentally to stakeholders, which is realized through the implementation of the Social and Environmental Responsibility (TJSL) program.

Sebagai perusahaan yang bergerak di sektor perbankan, Bank Sinarmas juga mengintegrasikan aspek keuangan berkelanjutan dalam program TJSL. Hal ini dimaksudkan untuk menciptakan dampak positif yang lebih besar dan berkelanjutan di berbagai sektor, sekaligus memastikan pertumbuhan ekonomi yang seimbang dengan keberlanjutan sosial dan lingkungan yang selaras dengan Rencana Aksi Keuangan Berkelanjutan (RAKB).

As a bank, Bank Sinarmas incorporates sustainable finance aspects into its Social and Environmental Responsibility program. This is intended to have a greater and more long-term positive impact in various sectors, while balancing economic growth with social and environmental sustainability in accordance with the Sustainable Finance Action Plan (RAKB).

Bank juga telah menetapkan visi keberlanjutan, yakni: "Menjadi bank swasta nasional yang selalu tumbuh dan memiliki kepedulian sosial dalam menjaga keseimbangan aspek ekonomi, sosial, dan lingkungan."

The Bank has also established a sustainability vision, namely, "To become a national private bank that always grows and has social concern in maintaining the balance of economic, social, and environmental aspects."

Di bidang sosial, program keberlanjutan Bank, antara lain berorientasi pada pengelolaan sumber daya manusia (SDM), komitmen terhadap Kesehatan dan Keselamatan Kerja (K3), pengembangan sosial dan masyarakat, perhatian terhadap pelanggan dan produk serta layanan, serta mempertahankan hubungan baik dengan mitra bisnis atau rekanan.

In the social sector, the Bank's sustainability program, among others, focuses on human resource management (HR), occupational health and safety (OHS), social and community development, customer service, products and services, and maintaining good relationships with business partners and associates.

Dalam aspek lingkungan, Bank memastikan penyaluran kredit sejalan dengan prinsip keuangan berkelanjutan melalui penilaian terhadap dokumen debitur, antara lain Analisis Mengenai Dampak Lingkungan Hidup (AMDAL) dan Upaya Pengelolaan Lingkungan Hidup - Upaya Pemantauan Lingkungan Hidup (UKL-UPL).

In terms of the environment, the Bank ensures that credit disbursement is in line with sustainable finance principles through an assessment of debtor documents, including Environmental Impact Analysis (AMDAL) and Environmental Management Efforts - Environmental Monitoring Efforts (UKL-UPL).

Bank juga menetapkan kebijakan pemberian kredit Usaha Mikro, Kecil, dan Menengah (UMKM) atau Kredit Usaha Rakyat (KUR), serta kebijakan pelaksanaan TJSL. Di samping itu, Bank menetapkan kriteria penilaian dan identifikasi terhadap prospek usaha, pengelolaan risiko lingkungan atas usaha yang dilakukan oleh debitur. Hal tersebut bertujuan untuk memastikan bahwa debitur tidak berada pada segmen atau kegiatan usaha yang dilarang oleh pemerintah atau Bank.

The Bank also develops a policy for providing credit to Micro, Small, and Medium Enterprises (MSMEs) or People's Business Credit (KUR), as well as a policy for implementing TJSL. Furthermore, the Bank establishes criteria for assessing and identifying business opportunities, as well as environmental risk management for debtor-owned businesses. This is to ensure that debtors are not involved in business segments or activities that are prohibited by the government or the Bank.

Selain itu, Bank Sinarmas juga melakukan pembelian Surat Berharga Pemerintah Seri FRSDG001 yang merupakan seri *Sustainable Development Goals (SDGs) Bond* pertama yang ditawarkan melalui lelang di pasar perdana domestik, pada akhir tahun 2024.

In addition, Bank Sinarmas purchased Government Securities Series FRSDG001, the first Sustainable Development Goals (SDGs) Bond series offered through auction in the domestic primary market, at the end of 2024.

Dewan Komisaris berpandangan, komitmen dan prinsip-prinsip di bidang keberlanjutan tersebut telah berjalan dengan baik di

The Board of Commissioners believes that Bank Sinarmas'

lingkungan Bank Sinarmas. Kedepan, Dewan Komisaris berhadap agar Direksi serta organisasi di bawahnya terus mempertahankan dan mengembangkan penerapan TJSL agar secara kuantitas dan kualitas, penerima manfaatnya terus bertambah.

## Perubahan Komposisi Dewan Komisaris

Sepanjang tahun buku 2024 hingga laporan tahunan ini terbit, tidak ada perubahan pada komposisi Dewan Komisaris. Dengan demikian, susunannya adalah:

commitment and principles in the field of sustainability are effective. In the future, the Board of Commissioners hopes that the Board of Directors and the organizations that report to it will continue to maintain and develop the implementation of TJSL, resulting in an increase in both the quantity and quality of beneficiaries.

## Changes in the Board of Commissioners' Composition

In the 2024 financial year until this annual report was published, there were no changes to the composition of the Board of Commissioners. Thus, the composition is:

| Nama<br>Name | Jabatan<br>Position |
|---|---|
| Tjendrawati Widjaja | Komisaris Utama<br>President Commissioner |
| Sammy Kristamuljana | Komisaris Independen<br>Independent Commissioner |
| Rusmin | Komisaris Independen<br>Independent Commissioner |

## Apresiasi

Sebagai penutup, Dewan Komisaris menyampaikan terima kasih kepada pemegang saham yang telah memberikan kesempatan kepada Dewan Komisaris menjadi bagian dari Bank. Begitu juga dengan arahan dan bimbingan yang diberikan, sehingga Dewan Komisaris dapat menjalankan tugas dan fungsinya dengan baik.

Atas pencapaian kinerja yang sangat baik pada tahun 2024, Dewan Komisaris menyampaikan penghargaan yang setinggi-tingginya kepada Direksi dan seluruh organisasi di bawahnya. Kepada regulator, Dewan Komisaris juga menyampaikan terima kasih atas bimbingan dan pengawasannya, sehingga usaha Bank berjalan dengan baik sesuai dengan regulasi yang telah ditetapkan dan praktik bisnis terbaik di tengah tantangan kegiatan usaha yang tidak mudah.

Kepada para pemangku kepentingan lain, Dewan Komisaris mengucapkan terima kasih atas kerja sama yang sudah berjalan selama ini. Dengan dukungan para pemangku kepentingan pula, manajemen mampu menyajikan kinerja usaha yang baik untuk tahun buku 2024.

## Appreciation

Finally, the Board of Commissioners would like to thank the shareholders for giving them the opportunity to become a part of the Bank. Likewise, the direction and guidance provided will help the Board of Commissioners carry out its duties and functions effectively.

The Board of Commissioners wishes to express its heartfelt gratitude to the Board of Directors and all organizations that report to it for their outstanding performance in 2024. The Board of Commissioners would also like to thank the regulators for their guidance and supervision, which ensures that the Bank's operations run smoothly in accordance with established regulations and best business practices despite the challenges of difficult business activities.

To other stakeholders, the Board of Commissioners would like to thank them for the cooperation that has been carried out so far. With the support of stakeholders, management is able to present good business performance for the 2024 financial year.

Jakarta, 25 April 2025
Atas nama Dewan Komisaris PT. Bank Sinarmas Tbk.
On behalf of the Board of Commissioners of PT. Bank Sinarmas Tbk.



**Tjendrawati Widjaja**
Komisaris Utama
President Commissioner

# DEWAN KOMISARIS
## Board of Commissioners

**RUSMIN**
**Komisaris Independen**
Independent Commissioner

**SAMMY KRISTAMULJANA**
**Komisaris Independen**
Independent Commissioner

**TJENDRAWATI WIDJAJA**
**Komisaris Utama**
President Commissioner





# LAPORAN DIREKSI [OJK D.1][GRI 2-22]
## Board of Director's Report

**FRENKY TIRTOWIJOYO**
**Presiden Direktur**
President Director

Pemegang Saham dan Pemangku Kepentingan yang Terhormat,

Sajian laporan tahunan PT. Bank Sinarmas Tbk. ("Bank Sinarmas", "Bank") untuk tahun 2024 ini merupakan bagian dari laporan pertanggungjawaban manajemen atas pengelolaan kegiatan usaha sepanjang tahun buku. Secara umum, situasi pada tahun tersebut masih sangat dinamis. Kendati demikian, Bank berhasil membukukan kinerja yang positif.

Pencapaian kinerja tersebut, antara lain ditunjukkan melalui laba bersih Bank Sinarmas yang mencapai Rp370 miliar. Dibandingkan tahun 2023 yang sebesar Rp76 miliar, terjadi kenaikan 388,33%. Hal ini didukung oleh penerapan strategi dan kebijakan strategis yang tepat.

This presentation of PT. Bank Sinarmas Tbk's. 2024 annual report ("Bank Sinarmas" or "the Bank") is part of the management accountability report for the fiscal year's business activities. In general, the situation throughout the year was dynamic. Nonetheless, the Bank managed to post a positive performance.

The achievement of this performance is demonstrated, among others, through Bank Sinarmas' net profit, which reached Rp370 billion. Compared to 2023, which was Rp76 billion, there was an increase of 388.33%. This is supported by the implementation of appropriate strategies and policies.

**Melalui penerapan strategi yang tepat, Bank berhasil meningkatkan laba bersih sebesar 255,33% dibandingkan tahun sebelumnya.**

Through the implementation of appropriate strategies, Bank managed to increase net profit by 255.33% compared to the previous year.



Kinerja Bank Sinarmas juga mendapat apresiasi dari pihak eksternal, yakni dalam bentuk penghargaan. Di antaranya, penghargaan dalam Indonesia Technology Excellence Awards 2024 di Bangkok, Thailand berupa "Indonesia Technology Excellence Awards 2024 for Mobile-Banking for SimobiPlus Revamp" dan "Indonesia Technology Excellence Award for Automation- Banking for MSME Loan Origination System".

Kedua penghargaan itu diperoleh atas keberhasilan Bank mengembangkan aplikasi *mobile banking* SimobiPlus serta peluncuran sistem originasi pinjaman Usaha Mikro, Kecil, dan Menengah (UMKM). Sistem tersebut merupakan otomatisasi proses bisnis *end-to-end* untuk originasi pinjaman, penilaian kredit, penjaminan, dan persetujuan pinjaman.

## Perkembangan Kondisi Ekonomi dan Industri

Situasi perekonomian global, sebagaimana disampaikan oleh Kementerian Keuangan dalam Nota Keuangan Anggaran Pendapatan dan Belanja Negara (APBN) 2025, relatif belum stabil. Pertumbuhan ekonomi global pada tahun 2024 diperkirakan mencapai 3,2%, sedikit menurun dibandingkan dengan 3,3% pada 2023. Sementara itu, pertumbuhan ekonomi global diperkirakan akan meningkat menjadi 3,3% pada 2025, seiring dengan penurunan suku bunga acuan oleh bank sentral yang dipicu oleh turunnya inflasi menuju target. Namun, angka ini masih belum dapat mencapai rata-rata pertumbuhan ekonomi global dalam 10 tahun terakhir yang sebesar 3,7%.

Meski demikian, perekonomian Indonesia masih

Bank Sinarmas' performance has been recognized by external parties in the form of awards. Among them are awards at the 2024 Indonesia Technology Excellence Awards in Bangkok, Thailand, such as the "Indonesia Technology Excellence Awards 2024 for Mobile-Banking for SimobiPlus Revamp" and the "Indonesia Technology Excellence Award for Automation-Banking for MSME Loan Origination System."

Both awards were obtained for the Bank's success in developing the SimobiPlus mobile banking application and launching the Micro, Small, and Medium Enterprises (MSME) loan origination system. The system is an end-to-end business process automation for loan origination, credit assessment, underwriting, and loan approval.

## Development of Economic and Industrial Conditions

The global economic situation, according to the Ministry of Finance's Financial Note for the 2025 State Budget (APBN), is relatively unstable. Global economic growth in 2024 was expected to be 3.2%, down slightly from 3.3% in 2023. Meanwhile, global economic growth is expected to rise to 3.3% in 2025, in line with the central bank's reduction in the benchmark interest rate, which was prompted by falling inflation toward the target. Nonetheless, this figure falls short of the 3.7% average global economic growth seen over the last decade.

# 388,33%

**Laba bersih Bank pada tahun 2024 tumbuh 388,33% dibandingkan tahun 2023.**
**The Bank's net profit in 2024 grew by 388.33% compared to 2023.**



menunjukkan ketahanan yang baik, meskipun ada sedikit pelambatan dalam laju pertumbuhannya. Badan Pusat Statistik (BPS) mencatatkan pertumbuhan ekonomi Indonesia pada 2024 sebesar 5,03%, sedikit melambat dibandingkan dengan 5,05% pada tahun sebelumnya.

Dari sisi pengeluaran, konsumsi rumah tangga tetap menjadi kontributor terbesar terhadap Produk Domestik Bruto (PDB) Indonesia, dengan kontribusi mencapai 54,04%. Komponen PDB ini tumbuh 4,98%, sedikit lebih tinggi dibandingkan dengan periode sebelumnya yang tercatat 4,91%.

Dari sisi lapangan usaha, sektor industri pengolahan masih menjadi kontributor utama, menyumbang 19,13% terhadap PDB. Kinerja sektor ini tumbuh 4,9% pada tahun 2024.

Sementara itu, sektor industri perbankan menunjukkan daya tahan yang baik. Berdasarkan data Bank Indonesia pada Desember 2024, kinerja intermediasi perbankan tetap kuat, tercermin dari pertumbuhan kredit bank umum pada Kuartal IV yang mencapai 10,39% (year on year/yoy), meskipun sedikit melambat dari periode sebelumnya yang tercatat 10,85% (yoy). Pertumbuhan kredit ini dipengaruhi oleh meningkatnya permintaan dari segmen korporasi yang didorong oleh penjualan yang baik dan kemampuan bayar yang kuat. Risiko kredit juga terpantau membaik, dengan

However, the Indonesian economy remains resilient, despite a slight slowdown in growth rates. The Central Bureau of Statistics (BPS) estimated Indonesia's economic growth in 2024 at 5.03%, slightly lower than the previous year's figure of 5.05%.

In terms of expenditure, household consumption continues to be the largest contributor to Indonesia's GDP, accounting for 54.04%. This GDP component increased by 4.98%, slightly higher than the previous period's 4.91%.

From a business perspective, the manufacturing sector remains the largest contributor, accounting for 19.13% of GDP. This sector's performance increased by 4.9% in 2024.

Meanwhile, the banking industry sector demonstrated strong resilience. According to Bank Indonesia data from December 2024, banking intermediation performance remained strong, as evidenced by the growth of commercial bank credit in Q4, which reached 10.39% (year on year/yoy), albeit slightly slower than the previous period, which was recorded at 10.85% (yoy). This credit growth was influenced by increased corporate demand, which was driven by strong sales and repayment capacity. Credit risk is also expected to improve, with the gross non-performing loan (NPL) ratio falling to 2.19%

**Bank melakukan inovasi serta mengembangkan *digital banking* secara berkesinambungan, yang berfokus pada *customer experience centricity*.**

Bank continuously innovates and develops digital banking, focusing on customer experience centricity.

rasio kredit bermasalah (Non Performing Loan/NPL) gross menurun menjadi 2,19%, dari sebelumnya 2,25% pada awal tahun, dan NPL net stabil pada angka 0,77%.

Di sisi lain, Dana Pihak Ketiga (DPK) perbankan tercatat tumbuh 3,7% (yoy), meskipun sedikit lebih rendah dibandingkan dengan pertumbuhan sebelumnya yang mencapai 5,8%. Likuiditas perbankan tetap terjaga dengan baik, didukung oleh kebijakan Bank Indonesia. Pada Desember 2024, rasio AL/DPK dan LDR perbankan masing-masing tercatat sebesar 25,59% dan 88,57%, yang menunjukkan likuiditas yang cukup longgar dan turut mendukung stabilitas sektor perbankan.

## KINERJA BANK TAHUN 2024

### Tantangan/Kendala yang Dihadapi

Di sepanjang tahun 2024 Bank Sinarmas menghadapi berbagai tantangan yang tidak dapat dihindari, diantaranya tantangan tingkat suku bunga simpanan yang tinggi sejalan dengan pertumbuhan kredit nasional yang lebih cepat dari pertumbuhan simpanan. Menghadapi kondisi tersebut, Bank Sinarmas menjaga kestabilan dana simpanan dengan mengelola *cost of fund* dan mengakselerasi pertumbuhan layanan nasabah prioritas.

Bank Sinarmas juga menghadapi tantangan pada kredit dan pembiayaan, dimana kombinasi dari penurunan daya beli masyarakat yang berdampak pada menurunnya penyaluran kredit kendaraan bermotor serta pelunasan-pelunasan dipercepat dari kredit korporasi berimplikasi pada penyusutan portofolio kredit dan pembiayaan sebesar 15%. Penyaluran kredit dan pembiayaan dengan tetap mengedepankan prinsip kehati-hatian terus dilakukan, namun untuk mengurangi tekanan pada pendapatan maka dana yang tersedia ditempatkan pada surat-surat berharga.

Di sisi lain, pesatnya transformasi digital menjadi pisau bermata dua yang menciptakan peluang sekaligus tantangan. Inovasi layanan dan *cyber security* menjadi dua hal yang secara berkesinambungan dilakukan oleh Bank Sinarmas agar kenyamanan dan keamanan nasabah dalam bertransaksi dapat terus ditingkatkan.

from 2.25% at the start of the year, while the net NPL remains stable at 0.77%.

On the other hand, Banking Third Party Funds (TPF) increased by 3.7% (yoy), slightly lower than the previous growth rate of 5.8%. Bank Indonesia's policies have contributed to keeping banking liquidity stable. In December 2024, the banking AL/TPF and LDR ratios were 25.59% and 88.57%, indicating relatively loose liquidity and supporting the banking sector's stability.

## BANK PERFORMANCE IN 2024

### Challenges/Obstacles Faced

Throughout 2024, Bank Sinarmas encountered numerous challenges, including high deposit interest rates, as domestic credit growth outpaced deposit growth. In facing this condition, Bank Sinarmas maintained the stability of deposit funds by managing the cost of funds and accelerating the growth of priority customer services.

Bank Sinarmas also had to contend with challenges in credit and financing, where the combination of declining public purchasing power, which had an impact on declining motor vehicle credit distribution, and accelerated repayments of corporate credit had implications for a 15% reduction in the credit and financing portfolio. The Bank continued to funnel credit and financing with a priority placed on the principle of prudence but paired the loan disbursement with placing available funds in securities to reduce pressure on income.

On the other hand, the rapid digital transformation was a double-edged sword that created both opportunities and challenges. Service innovation and cyber security were two things that Bank Sinarmas continuously did to improve customer convenience and security in transactions.

## Strategi dan Kebijakan Strategis

Strategi dan kebijakan strategis yang diterapkan pada tahun 2024 merupakan langkah-langkah yang diambil untuk mengatasi tantangan yang dihadapi serta untuk mendukung tercapainya rencana bisnis Bank. Kebijakan-kebijakan yang diterapkan telah membawa Bank Sinarmas pada hasil yang positif. Strategi dan kebijakan yang diambil antara lain:

### Penghimpunan Dana Pihak Ketiga

Bank mengakselerasi layanan nasabah prioritas yang pertama kali diluncurkan pada bulan Desember 2023 untuk menjaga kestabilan dan meningkatkan penghimpunan dana pihak ketiga. Layanan nasabah prioritas yang memberikan tingkat suku bunga lebih tinggi dan keuntungan-keuntungan lainnya dinilai tepat dalam menyikapi persaingan tingkat suku bunga tinggi yang terjadi di sepanjang tahun 2024. Beberapa strategi yang dilakukan antara lain meningkatkan aktivitas dan promosi khusus segmentasi prioritas dengan mengadakan berbagai kegiatan, melakukan *tier-based approach* dengan memfokuskan nasabah-nasabah existing yang mempunyai *asset under management* (AUM) <IDR500 juta sehingga dapat meningkatkan *average product ratio*/ nasabah dan meningkatkan AUM. Di samping itu, Bank juga mengelola *cost of fund* dengan memberikan rate khusus secara *case by case*.

### Penyaluran Dana

Penyaluran dana dalam bentuk kredit dan pembiayaan terus dilakukan, namun demikian karena pencairan baru belum dapat menutupi pelunasan maka Bank menempatkan dana yang tersedia pada surat berharga, sebagai alternatif sumber pendapatan di luar kredit. Peningkatan Pendapatan Operasional Diluar Bunga Bank senantiasa mengoptimalkan pendapatan operasional diluar bunga untuk membantu pertumbuhan pendapatan operasional. Hal ini dimungkinkan dengan terus menjalin keagenan dan berkolaborasi dengan pihak ketiga untuk pengembangan sistem pembayaran serta menambah fitur-fitur pada layanan *electronic banking*.

### Pengembangan Digital Banking

Pesatnya transformasi digital mendorong Bank Sinarmas untuk terus memperkuat *cyber security* untuk memastikan keamanan nasabah dalam bertransaksi. Secara berkesinambungan, Bank melakukan inovasi serta mengembangkan digital banking yang berfokus pada pengalaman nasabah (*customer experience centricity*) sehingga dapat mengembangkan produk, layanan, dan fitur sesuai dengan preferensi dan kebutuhan nasabah.

## Strategic Strategy and Policy

The strategic strategy and policy implemented in 2024 were steps taken to overcome the challenges faced and help achieve the Bank's business plan. The policies implemented have brought Bank Sinarmas to positive results. The strategies and policies taken included:

### Third-Party Fund Collection

The Bank is accelerating priority customer services, which were first launched in December 2023 to maintain stability and increase third-party fund collection. Priority customer services that provide higher interest rates and other benefits are considered appropriate in responding to the high interest rate competition that occurred throughout 2024. Several strategies implemented include increasing activities and special promotions for priority segments by holding various activities and implementing a tier-based approach by focusing on existing customers who have assets under management (AUM) <IDR500 million so that they can increase the average product ratio/customer and increase AUM. In addition, the Bank also manages the cost of funds by providing special rates on a case-by-case basis.

### Fund Distribution

Fund distribution in the form of credit and financing continued; however, since new disbursements were not able to cover repayment, the Bank placed available funds in securities as an alternative source of income outside of credit. Increasing Operating Income Outside of Interest The Bank continues to optimize operating income outside of interest to help grow operating income. This was thanks to the continued effort to establish agencies and collaborate with third parties to develop payment systems and add features to electronic banking services.

### Digital Banking Development

The rapid digital transformation encourages Bank Sinarmas to continue to strengthen cyber security to ensure customer security in transactions. On an ongoing basis, the Bank innovates and develops digital banking that focuses on customer experience (customer experience centricity) so it can develop products, services, and features according to customer preferences and needs.

## Peran Direksi dalam Perumusan Strategi dan Kebijakan Strategis serta Proses untuk Memastikan Implementasinya

Direksi berperan penting dalam perumusan strategi dan kebijakan yang dituangkan pada rencana bisnis Bank Sinarmas. Dokumen tersebut berisi tentang rencana kegiatan usaha Bank jangka pendek (satu tahun) dan jangka menengah (tiga tahun), termasuk rencana meningkatkan kinerja usaha serta strategi untuk merealisasikannya.

Direksi bertanggung jawab untuk mengidentifikasi potensi, risiko, dan peluang bisnis, serta merumuskan langkah-langkah strategis yang tepat, sesuai dengan peran dan posisinya masing-masing. Proses ini menunjukkan bahwa Direksi terlibat langsung bersama organisasi di bawahnya, dalam menyusun strategi dan kebijakan strategis Bank yang akan dijalankan pada tahun buku.

Dalam menjalankan strategi dan kebijakan strategis yang telah ditetapkan, Direksi secara aktif bekerja sama dengan manajemen dan komite pendukung untuk memastikan bahwa semua departemen telah memahami dan melaksanakan strategi Bank dengan baik. Keterlibatan aktif seluruh jenjang organisasi yang ada pada Bank dalam mencapai rencana kerja yang telah ditetapkan tercermin pada *key performance indicator* (KPI) yang jelas dan terukur. Melalui rapat rutin, Direksi beserta manajemen senior mengevaluasi penerapan kebijakan dan pencapaian kinerja, serta menyelaraskan strategi-strategi yang ada dengan peluang dan tantangan yang dihadapi.

## Pencapaian Kinerja dan Realisasi Target

Sepanjang tahun 2024, Bank Sinarmas membukukan kinerja usaha yang solid, walaupun di tengah situasi eksternal yang masih penuh tantangan. Pendapatan bersih Bank pada tahun buku mencapai Rp370 miliar, lebih tinggi 388,33% dari tahun 2023. Sedangkan dibandingkan target yang telah ditetapkan, pencapaian tersebut adalah 126,01%.

Pendapatan operasional tercatat sebesar Rp3.575 miliar, lebih tinggi 0,73% dibandingkan tahun sebelumnya. Hasil tersebut setara dengan 98,63% dari target.

Dari sisi intermediasi, Bank telah menyalurkan kredit senilai Rp14.648 miliar, lebih rendah 15,11% dibandingkan tahun sebelumnya atau 89,66% dari target. Tingkat kualitas kredit yang ditunjukkan melalui rasio kredit bermasalah atau *Non Performing Loan* (NPL) tetap terjaga dibawah ketentuan regulator.

Untuk penghimpunan Dana Pihak Ketiga (DPK), nilainya mencapai Rp44.820, lebih tinggi 6,34% dibandingkan tahun sebelumnya. Dibandingkan target, pencapaiannya adalah 94,34%.

## The Role of the Board of Directors in Formulating Strategic Strategies and Policies and the Process to Ensure Their Implementation

The Board of Directors plays an important role in formulating strategies and policies outlined in Bank Sinarmas' business plan. The document contains the Bank's short-term (one year) and medium-term (three years) business activity plans, including a scheme to improve business performance and how to realize it.

The Board of Directors is responsible for identifying potential risks and business opportunities, as well as formulating appropriate strategic measures, in accordance with their respective roles and positions. This process demonstrates that the Board of Directors is directly engaged with the organizations below it in formulating the Bank's strategies and strategic policies that will be implemented in the fiscal year.

In implementing the established strategic strategies and policies, the Board of Directors actively collaborates with management and supporting committees to ensure that all departments understand and implement the Bank's strategy properly. The active involvement of all levels of the Bank's organization in achieving the established work plan is reflected in clear and measurable key performance indicators (KPIs). Through regular meetings, the Board of Directors and senior management evaluate the implementation of policies and performance achievements and align existing strategies with the opportunities and challenges faced.

## Performance Achievement and Target Realization

Throughout 2024, Bank Sinarmas posted solid business performance, even amidst the external situation that was still full of challenges. The Bank's net income in the financial year reached IDR370 billion, 388.33% higher than in 2023. It was a 126.01% achievement of its stated target.

Operating income was recorded at IDR3,575 billion, 0.73% higher than the previous year. This result was equivalent to 98.63% of the target.

From the intermediation side, the Bank distributed credit of Rp14,648 billion, 15.11% lower than the previous year or 89.66% of the target. The level of credit quality indicated by the ratio of non-performing loans (NPL) remained below the regulatory provisions.

For the collection of Third Party Funds (DPK), the value reached Rp44,820, 6.34% higher than the previous year. It was 94.34% of its stated target.

Meningkatnya laba bersih Bank mendukung meningkatnya rasio-rasio utama, seperti rasio ROA, ROE yang mengalami peningkatan menjadi 0,82% dan 4,74% dari 0,15% dan 1,07%, serta rasio BOPO mengalami perbaikan menjadi 90,78% dari 103,36%. Apabila dibandingkan dengan target, rasio-rasio Bank berada diatas target yang ditetapkan, pencapaiannya untuk rasio ROA, ROE dan BOPO masing-masing sebesar 121,07%, 125,75% dan 98,63%.

## Komitmen terhadap UMKM

Bank Sinarmas memiliki komitmen yang kuat untuk mendukung pengembangan Usaha Mikro, Kecil, dan Menengah (UMKM) sebagai bagian dari kontribusinya terhadap perekonomian Indonesia. Komitmen ini tercermin dalam berbagai program dan kebijakan yang mereka jalankan, terutama dalam penyaluran kredit yang dapat membantu UMKM berkembang dan memperkuat daya saing mereka di pasar.

## Strategi Penyaluran Dana kepada UMKM

Strategi Bank Sinarmas dalam penyaluran dana kepada UMKM didasarkan pada pemahaman bahwa UMKM memerlukan akses permodalan yang mudah, cepat, dan dengan bunga yang kompetitif. Bank Sinarmas mengimplementasikan beberapa strategi utama untuk mencapai hal ini, antara lain:

1. **Penyederhanaan Proses Aplikasi Kredit**: Bank Sinarmas menyederhanakan proses pengajuan kredit bagi UMKM, dengan memberikan kemudahan akses baik melalui cabang fisik maupun platform digital. Proses yang cepat dan transparan memungkinkan UMKM untuk memperoleh dana yang dibutuhkan dalam waktu singkat.
2. **Penawaran Produk Pembiayaan yang Beragam**: Bank Sinarmas menawarkan berbagai produk pembiayaan, seperti Kredit Usaha Rakyat (KUR), pinjaman modal kerja, dan pinjaman investasi, yang dapat disesuaikan dengan kebutuhan masing-masing sektor UMKM.
3. **Pelatihan**: Selain pemberian kredit, Bank Sinarmas juga memberikan pelatihan dan pendampingan untuk UMKM agar mereka bisa mengelola bisnis mereka dengan lebih baik, meningkatkan kemampuan manajerial dan pemasarannya.

## Kinerja Penyaluran Kredit terhadap UMKM

Bank Sinarmas secara konsisten menunjukkan kinerja yang baik dalam penyaluran kredit kepada UMKM. Penyaluran kredit yang semakin meningkat setiap tahunnya menjadi bukti nyata komitmen bank dalam mendukung sektor UMKM. Penyaluran kredit ke pelaku UMKM hingga akhir tahun 2024 mencapai kurang lebih Rp. 7,8 T dan menyalurkannya kepada ribuan UMKM di berbagai sektor, seperti perdagangan, pengolahan, jasa dan lainnya . Program-program unggulan seperti KUR, serta produk pembiayaan lainnya, telah membantu banyak usaha kecil dan mikro untuk berkembang lebih baik. Selain itu, Bank Sinarmas juga aktif dalam menjalin kemitraan dengan lembaga-lembaga pemerintah dan asosiasi UMKM untuk memperluas jaringan dukungan bagi sektor ini.

The increase in the Bank's net profit supported the increase in key ratios, such as the ROA and ROE ratios, which increased to 0.82% and 4.74% from 0.15% and 1.07%, and the BOPO ratio, which improved to 90.78% from 103.36%. When compared to the target, the Bank's ratios were above their stated targets, with the achievements for the ROA, ROE, and BOPO ratios being 121.07%, 125.75%, and 98.63%, respectively.

## Commitment to MSMEs

Bank Sinarmas has a strong commitment to supporting the development of Micro, Small, and Medium Enterprises (MSMEs) as part of its contribution to the Indonesian economy. This commitment is reflected in the various programs and policies they implement, particularly in the disbursement of credit that can help MSMEs develop and strengthen their competitiveness in the market.

## Fund Disbursement Strategy to MSMEs

Bank Sinarmas' strategy for disbursing funds to MSMEs is based on the notion that MSMEs require easy, quick access to capital at competitive interest rates. Bank Sinarmas employs several primary strategies to accomplish this, including:

1. **Simplifying the Credit Application Process**: Bank Sinarmas simplifies the credit application process for MSMEs, by providing easy access both through physical branches and digital platforms. The fast and transparent process allows MSMEs to obtain the funds they need in a short time.
2. **Offering a Variety of Financing Products**: Bank Sinarmas offers a variety of financing products, such as People's Business Credit (KUR), working capital loans, and investment loans, which can be tailored to the needs of each MSME sector.
3. **Training**: In addition to providing credit, Bank Sinarmas also provides training and mentoring for MSMEs so that they can manage their businesses better, improve their managerial and marketing skills.

## Credit Disbursement Performance to MSMEs

Bank Sinarmas has consistently performed well in credit disbursement to MSMEs. The Bank's commitment to supporting the MSME sector is evident in its increasing credit distribution year after year. Credit disbursement to MSME actors is expected to reach Rp7.8 trillion by the end of 2024, with thousands of MSMEs in various sectors, including trade, processing, and services. Excellent programs like KUR, as well as other financing products, have helped many small and micro businesses grow. Furthermore, Bank Sinarmas is actively seeking partnerships with government institutions and MSME associations to broaden the sector's support network.

Dengan terus berfokus pada inovasi dan peningkatan pelayanan, Bank Sinarmas berharap dapat memperkuat kontribusinya terhadap sektor UMKM dan mendukung penciptaan lapangan kerja serta pemberdayaan ekonomi lokal di Indonesia.

## Prospek Usaha Tahun 2025

Pada tahun 2025, pertumbuhan ekonomi Indonesia diperkirakan tumbuh moderat di kisaran 4,7–5,1%, sedikit direvisi turun oleh Bank Indonesia (BI) dari proyeksi sebelumnya karena lemahnya ekspor, konsumsi rumah tangga, dan investasi swasta. BI juga menurunkan suku bunga acuan sebesar 25 bps menjadi 5,75% pada Januari 2025 untuk mendorong pertumbuhan, yang diperkirakan akan dipertahankan sementara waktu demi menjaga stabilitas rupiah yang tertekan. Di sisi global, pertumbuhan ekonomi dunia diproyeksikan stagnan pada kisaran 3,3% menurut IMF dan 2,7% menurut Bank Dunia, mencerminkan masih adanya tekanan dari ketidakpastian geopolitik, inflasi yang belum sepenuhnya reda, serta arah kebijakan suku bunga di negara-negara maju. Meskipun konsumsi masyarakat dan investasi publik menjadi faktor pendukung di dalam negeri, tantangan eksternal seperti melemahnya permintaan global, ketidakpastian perdagangan internasional, dan tekanan nilai tukar tetap membayangi prospek ekonomi nasional.

Sektor perbankan Indonesia menunjukkan ketahanan yang solid memasuki awal 2025, dengan kinerja intermediasi yang tetap kuat meskipun mengalami sedikit perlambatan. Likuiditas perbankan juga tetap memadai, dengan rasio alat likuid terhadap dana pihak ketiga (AL/DPK) tercatat sebesar 26,03% pada Januari 2025, meningkat dari 25,59% pada Desember 2024. Bank Indonesia memproyeksikan pertumbuhan kredit pada 2025 berada dalam kisaran 11–13%, sejalan dengan prospek pertumbuhan ekonomi yang tetap baik dan dukungan kebijakan makroprudensial. Dengan kondisi ini, sektor perbankan diharapkan terus berkontribusi positif terhadap perekonomian nasional.

Memasuki tahun 2025, Bank Sinarmas meyakini dana pihak ketiga dan kredit akan bertumbuh dari tahun 2024. Penghimpunan dana pihak ketiga tetap diarahkan pada peningkatan giro dan tabungan melalui produk dan layanan yang sudah berjalan maupun pengembangan atas produk-produk yang telah ada. Penghimpunan dana melalui layanan nasabah prioritas juga akan berlanjut, dengan pembukaan kantor-kantor khusus untuk Bank Sinarmas Prioritas. Terkait kredit, penyaluran kredit akan dilakukan dengan memanfaatkan serta mengembangkan ekosistem yang ada, di samping memperluas penyaluran kredit melalui skema kerjasama dengan pihak ketiga.

Selain itu, Bank juga senantiasa melengkapi fitur Mobile Banking Bank Sinarmas untuk melakukan cross selling produk Bank dan kemudahan transaksi bagi nasabah serta meningkatkan pemasaran atau promosi produk dan layanan melalui beragam media untuk meningkatkan awareness nasabah mengenai layanan dan fasilitas dari Bank Sinarmas.

By continuing to focus on innovation and service improvement, Bank Sinarmas hopes to strengthen its contribution to the MSME sector and support job creation and local economic empowerment in Indonesia.

## 2025 Business Prospect

In 2025, Indonesia's economic growth is estimated to grow moderately in the range of 4.7–5.1%, slightly revised down by Bank Indonesia (BI) from its previous projection, as exports, household consumption, and private investment are likely to grow weaker. BI also lowered its benchmark interest rate by 25 bps to 5.75% in January 2025 to boost growth but may pause it there for a while to maintain rupiah stability. On the global side, world economic growth is projected to stagnate at around 3.3% according to the IMF and 2.7% according to the World Bank, reflecting persistent pressure from geopolitical uncertainty, inflation that has not fully subsided, and the direction of interest rate policies in developed countries. Although public consumption and public investment are supporting factors domestically, external challenges such as weakening global demand, uncertainty in international trade, and exchange rate pressures continue to overshadow the national economic outlook.

Indonesia's banking sector showed solid resilience entering early 2025, with intermediation performance remaining strong despite experiencing a slight slowdown. Banking liquidity also remains adequate, with the ratio of liquid assets to third-party funds (AL/TPF) recorded at 26.03% in January 2025, up from 25.59% in December 2024. Bank Indonesia projects credit growth in 2025 to be in the range of 11–13%, in line with the prospect of economic growth that remains good and supported by macroprudential policies. With such a likely projection, the banking sector is expected to continue to contribute positively to the national economy.

Bank Sinarmas believes that as it enters 2025, third-party funds and credit will grow from 2024. The collection of third-party funds remains directed at increasing current accounts and savings through existing products and services as well as the development of existing products. The collection of funds through priority customer services will also continue, with the opening of special offices for Bank Sinarmas Prioritas. Credit distribution will be carried out by utilizing and developing the existing ecosystem and expanding credit distribution through cooperation schemes with third parties.

The Bank will go even further by adding more features to its Mobile Banking, cross-selling Bank products, and facilitating transactions for customers. It will also increase marketing or promotion of products and services through various media to increase customer awareness of Bank Sinarmas' services and facilities.

## IMPLEMENTASI TATA KELOLA PERUSAHAAN

Bank Sinarmas menyadari pentingnya penerapan prinsip tata kelola perusahaan yang baik (*Good Corporate Governance*/ GCG) dalam mendukung keberlangsungan usaha Bank. Karena itu, Bank memastikan bahwa prinsip GCG selalu diimplementasikan pada seluruh kegiatan usaha yang dijalankan.

Dalam penerapan GCG, Bank senantiasa berlandaskan pada 5 (lima) prinsip dasar Tata Kelola yang baik, yaitu:

- Keterbukaan (*transparency*)
  Keterbukaan dalam proses pengambilan keputusan, pengungkapan dan penyediaan informasi yang relevan serta mudah diakses oleh Pemangku Kepentingan.
- Akuntabilitas (*accountability*)
  Kejelasan fungsi dan pelaksanaan pertanggungjawaban.
- Pertanggungjawaban (*responsibility*)
  Kesesuaian pengelolaan dengan ketentuan peraturan perundang - undangan dan nilai etika serta standar, prinsip, dan praktik.
- Independensi (*independency*)
  Keadaan yang dikelola secara mandiri dan profesional serta bebas dari benturan kepentingan dan pengaruh atau tekanan dari pihak manapun yang tidak sesuai dengan ketentuan peraturan perundang-undangan dan nilai etika serta standar, prinsip, dan praktik.
- Kewajaran (*fairness*)
  Kesetaraan, keseimbangan, dan keadilan dalam memenuhi hak Pemangku Kepentingan yang timbul berdasarkan perjanjian, ketentuan peraturan perundang-undangan, dan nilai etika serta standar, prinsip, dan praktik.

Sebagai upaya untuk meningkatkan kualitas penerapan GCG secara terus-menerus, Bank senantiasa melakukan *review* dan penyesuaian terhadap kebijakan tata kelola sesuai dengan perkembangan yang terjadi. Dengan demikian, Bank tidak hanya menunjukkan komitmen terhadap praktik GCG, tetapi juga menegaskan tekad untuk terus memperbaiki dan meningkatkan standar tata kelola perusahaan.

Pada tahun 2024, Bank telah melakukan penilaian terhadap kinerja penerapan GCG yang dijalankan. Melalui penilaian mandiri (*self assesment*), hasilnya adalah “Baik”.

Penerapan GCG Bank memiliki sejumlah tujuan, yang tidak hanya dalam rangka meningkatkan kinerja Bank. Lebih dari itu, untuk melindungi kepentingan para pemangku kepentingan, sekaligus meningkatkan kepatuhan terhadap peraturan perundang-undangan serta nilai-nilai etika (*code of conduct*) yang berlaku secara umum pada industri perbankan.

## IMPLEMENTATION OF CORPORATE GOVERNANCE

Bank Sinarmas recognizes the importance of implementing good corporate governance (GCG) principles to support the Bank’s business sustainability. As a result, the Bank ensures that the GCG principles are consistently applied to all business activities.

In implementing GCG, the Bank always bases itself on 5 (five) basic principles of good governance, namely:

- Transparency
  Openness in the decision-making process, disclosure and provision of relevant information that is easily accessible to Stakeholders.
- Accountability
  Clarity of functions and implementation of accountability.
- Responsibility
  Compliance of management with provisions of laws and regulations and ethical values as well as standards, principles, and practices.
- Independency
  A state of being managed independently and professionally and free from conflicts of interest and influence or pressure from any party that is not in accordance with the provisions of laws and regulations and ethical values and standards, principles, and practices.
- Fairness
  Equality, balance, and justice in fulfilling the rights of Stakeholders arising from agreements, provisions of laws and regulations, and ethical values and standards, principles, and practices.

In order to continuously improve the quality of GCG implementation, the Bank regularly reviews and adjusts its governance policies in response to developments. Thus, the Bank not only demonstrates its commitment to GCG practices but also confirms its determination to continuously improve and enhance corporate governance standards.

In 2024, the Bank assessed the effectiveness of its GCG implementation. The self-assessment resulted in a rating of “Good.”

The Bank’s GCG implementation has a number of objectives, including not only improving the Bank’s performance but also protecting stakeholders’ interests while improving compliance with general banking laws, regulations, and codes of conduct.

## PENERAPAN ASPEK KEBERLANJUTAN

Bank Sinarmas berkomitmen untuk mendukung penerapan keuangan berkelanjutan dengan menyeimbangkan 3 (tiga) pilar keberlanjutan, yakni ekonomi, sosial, dan lingkungan. Sebagai wujud dari komitmen tersebut, Bank Sinarmas terus mengembangkan bisnis dengan tetap mengedepankan aspek sosial, yaitu menyalurkan kredit kepada Usaha Mikro, Kecil, dan Menengah (UMKM) termasuk dukungan kepada program pemerintah dalam bentuk penyaluran Kredit Usaha Rakyat (KUR).

Untuk aspek lingkungan, Bank terus berupaya meningkatkan penyaluran kredit kepemilikan Kendaraan Bermotor Listrik Berbasis Baterai (*Electric Vehicle*) melalui kerjasama penyaluran kredit dengan Mitra Bank. Selain itu, Bank melakukan pembelian Surat Berharga Pemerintah Seri FRSDG001 yang merupakan seri *Sustainable Development Goals (SDGs) Bond* pada akhir tahun 2024.

Bank Sinarmas juga percaya bahwa aspek keberlanjutan akan berjalan dengan maksimal apabila didukung oleh Sumber Daya Manusia (SDM) yang berkualitas. Bank telah dan akan terus melakukan Peningkatan dan Pengelolaan SDM internal melalui berbagai pelatihan yang relevan.

Bank Sinarmas juga berpartisipasi aktif dalam menjalankan peta jalan Keuangan Berkelanjutan regulator, seperti melakukan pemetaan debitur berdasarkan Taksonomi Keuangan Berkelanjutan Indonesia (TKBI) yang merupakan pembaruan dari Taksonomi Hijau Indonesia (THI).

## PERUBAHAN KOMPOSISI DIREKSI DAN ALASAN TERJADINYA PERUBAHAN

Pada tahun 2024 telah terjadi perubahan komposisi Direksi. Rapat Umum Pemegang Saham Luar Biasa yang diselenggarakan pada 28 Oktober 2024 menyetujui pengangkatan Amandalia Johanes sebagai Direktur untuk masa jabatan terhitung sejak ditutupnya rapat tersebut sampai dengan berakhirnya masa jabatan Direksi yang saat ini menjabat, yaitu saat penutupan RUPS Tahunan yang diselenggarakan pada tahun 2026.

## IMPLEMENTATION OF SUSTAINABILITY ASPECTS

Bank Sinarmas is committed to supporting the implementation of sustainable finance by balancing the 3 (three) pillars of sustainability: economic, social, and environmental. As a demonstration of this commitment, Bank Sinarmas continues to grow its business while prioritizing the social aspect, specifically by extending credit to Micro, Small, and Medium Enterprises (MSMEs) and providing support for government programs through the distribution of People's Business Credit (KUR).

In terms of the environment, the Bank continues to attempt to increase credit disbursement for the purchase of electric vehicles through credit distribution cooperation with Bank Partners. In addition, the Bank purchased Government Securities Series FRSDG001, a series of Sustainable Development Goals (SDG) Bonds, at the end of 2024.

Bank Sinarmas also believes that quality Human Resources (HR) will assist in making the sustainability aspect function optimally. The Bank has and will continue to improve and manage internal HR through various relevant training programs.

Bank Sinarmas is also actively involved in implementing the regulator's Sustainable Finance roadmap, such as mapping debtors using the Indonesian Sustainable Finance Taxonomy (TKBI), an update to the Indonesian Green Taxonomy (THI).

## CHANGES IN THE BOARD OF DIRECTORS' COMPOSITION AND REASONS FOR THE CHANGES

In 2024, there was a change in the composition of the Board of Directors. The Extraordinary General Meeting of Shareholders held on October 28, 2024, approved the appointment of Amandalia Johanes as Director for a term of office starting from the closing of the meeting until the end of the term of office of the current Board of Directors, namely at the closing of the Annual GMS held in 2026.

Alasan adanya penambahan anggota Direksi ini dalam rangka memperkuat susunan anggota Direksi serta disesuaikan dengan kompleksitas Bank. Dengan demikian, komposisi Direksi hingga laporan tahunan ini terbit adalah:

| Nama | Jabatan |
|---|---|
| Frenky Tirtowijoyo | : Direktur Utama |
| Miko Andidjaja | : Direktur |
| Ekajaya Ongny Putra | : Direktur |
| Enny Kamal | : Direktur |
| Sendy | : Direktur |
| Amandalia Johanes | : Direktur |

## Apresiasi

Direksi menyampaikan terima kasih atas kepercayaan dan arahan yang diberikan oleh Pemegang Saham dalam mengelola kegiatan usaha Bank Sinarmas pada tahun buku 2024. Kepada Dewan Komisaris, Direksi juga menyampaikan apresiasi yang telah memberikan dukungan konstruktif hingga Bank berhasil mencatatkan kinerja yang positif. Begitu pun dengan regulator atas bimbingan yang diberikan.

Direksi juga mengucapkan terima kasih atas dedikasi dan kerja sama seluruh tim manajemen dan karyawan dalam meraih pencapaian kinerja yang baik untuk tahun buku 2024.

Kepada para pemangku kepentingan lain, baik nasabah maupun mitra kerja serta pihak lainnya, Direksi menyampaikan apresiasi yang sebesar-besarnya atas kerja sama yang telah terjalin. Semoga kerja sama yang telah terjalin akan terus berkembang sehingga Bank Sinarmas dapat memberikan manfaat lebih besar bagi para pemangku kepentingan.

The addition of Board of Directors members is intended to strengthen the Board's composition and is appropriate for the Bank's complexity. Thus, the composition of the Board of Directors until the publication of this annual report is as follows:

| Name | Position |
|---|---|
| Frenky Tirtowijoyo | : President Director |
| Miko Andidjaja | : Director |
| Ekajaya Ongny Putra | : Director |
| Enny Kamal | : Director |
| Sendy | : Director |
| Amandalia Johanes | : Director |

## Appreciation

The Board of Directors would like to acknowledge the shareholders for their trust and guidance in managing Bank Sinarmas' business activities in the fiscal year 2024. The Board of Directors also appreciates the Board of Commissioners for providing constructive support, which enabled the Bank to achieve positive results. Likewise, with the regulator's guidance.

The Board of Directors is also grateful for the dedication and cooperation of the entire management team and employees in achieving good performance for the 2024 fiscal year.

To other stakeholders, customers, and business partners, as well as other parties, the Board of Directors would also like to extend its greatest appreciation for the established cooperation. We are confident that the cooperation that has been established will continue to grow, allowing Bank Sinarmas to provide even greater benefits to stakeholders.

Jakarta, 25 April 2025
Atas Nama Direksi PT. Bank Sinarmas Tbk.
On behalf of the Board of Directors of PT. Bank Sinarmas Tbk.



**Frenky Tirtowijoyo**
Direktur Utama
President Director

# DIREKSI
## Board of Directors

**ENNY KAMAL**
**Direktur**
Director

**AMANDALIA JOHANES**
**Direktur**
Director

**MIKO ANDIDJAJA**
**Direktur**
Director

**SENDY**
**Direktur**
Director

**FRENKY TIRTOWIJOYO**
**Direktur Utama**
President Director

**EKAJAYA ONGNY PUTRA**
**Direktur**
Director



# TANGGUNG JAWAB LAPORAN TAHUNAN DAN KEBERLANJUTAN [OJK G.2]

Annual and Sustainability Report Responsibility

**SURAT PERNYATAAN ANGGOTA DEWAN KOMISARIS DAN DIREKSI TENTANG TANGGUNG JAWAB ATAS LAPORAN TAHUNAN DAN KEBERLANJUTAN 2024 PT. BANK SINARMAS TBK.**

Statement of Members of the Board of Commissioners and the Board of Directors on the Responsibility for the 2024 Annual and Sustainability Report of PT. Bank Sinarmas Tbk.

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

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

Demikian pernyataan ini dibuat dengan sebenarnya.

This statement is hereby made in all truthfulness.

Jakarta, 25 April 2025
Jakarta, April 25, 2025

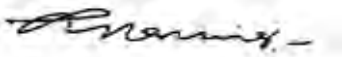
**DEWAN KOMISARIS**
Board of Commissioners



**TJENDRAWATI WIDJAJA**
**Komisaris Utama**
President Commissioner



**SAMMY KRISTAMULJANA**
**Komisaris Independen**
Independent Commissioner



**RUSMIN**
**Komisaris Independen**
Independent Commissioner

**DIREKSI**
Directors



**FRENKY TIRTOWIJOYO**
**Direktur Utama**
President Director



**MIKO ANDIDJAJA**
**Direktur**
Director



**EKAJAYA ONGNY PUTRA**
**Direktur**
Director



**ENNY KAMAL**
**Direktur**
Director



**SENDY**
**Direktur**
Director



**AMANDALIA JOHANES**
**Direktur**
Director

# PROFIL PERUSAHAAN
## Company Profile



.03

# IDENTITAS PERUSAHAAN [OJK C.2][OJK C.3][GRI 2-1][GRI 2-6]
## Company Identity

**Nama Perusahaan**
Company Name

bank sinarmas

PT. Bank Sinarmas Tbk.

**Informasi Perubahan Nama**
Information on Name Change

- 1989: Didirikan dengan nama PT Bank Shinta Indonesia.
- 2006: Pergantian nama menjadi PT. Bank Sinarmas.
- 1989: Established under the name PT Bank Shinta Indonesia.
- 2006: Change of name to PT. Bank Sinarmas.

**Tanggal Pendirian**
Date of Establishment

18 Agustus 1989
August 18, 1989

**Bidang Usaha**
Business Field

Perbankan
Banking

**Status Bank**
Bank Status

Bank Devisa
Foreign Exchange Bank

**Jaringan Kantor**
Office Network

68 Kantor Cabang
Branch Offices

192 Kantor Cabang Pembantu
Sub-Branch Offices

62 Kantor Fungsional Operasional
Operational Functional Offices

10 Kantor Fungsional UMK
SME Functional Offices

**Alamat Kantor Pusat**
Head Office Address

Sinar Mas Land Plaza Tower I, Lantai 1 dan 2 | 1st and 2nd Floor
Jl. MH. Thamrin Kav. 51, Jakarta 10350
Telp. | Phone (+62 21) 3199 0101
Fax. | Facsimile (+62 21) 3199 0401

**Dasar Hukum Pendirian**
Legal Basis of Establishment

Berdasarkan Akta No. 52 tanggal 18 Agustus 1989 yang dibuat di hadapan Buniarti Tjandra, SH, Notaris di Jakarta, yang telah diumumkan dalam Berita Negara Republik Indonesia tertanggal 21 Oktober 1989 No. 1506/1989.
Based on Deed No. 52 dated August 18, 1989, which was made before Buniarti Tjandra S.H., a Notary in Jakarta, and was announced in State Gazette of the Republic of Indonesia dated October 21, 1989, No. 1506/1989.

**Dasar Hukum Perubahan Nama**
Legal Basis of Name Change

Berdasarkan Akta No. 1 tanggal 21 November 2006 dari Triphosa Lily Ekadewi, S.H., M.Kn notaris di Jakarta.
Based on Deed No. 1 dated November 21, 2006, made before Triphosa Lily Ekadewi, S.H., M.Kn., a notary in Jakarta.

**Nama Bursa**
Stock Exchange

Bursa Efek Indonesia
Indonesia Stock Exchange

**Tanggal Pencatatan Saham**
Share Listing Date

13 Desember 2010
December 13, 2010

**Kode Saham**
Stock Code

**BSIM**

**Kode Layanan**
Service Code

Swift Code : SBJKIDJA
Telex : 67171 SHINPS IA
I-Telex : 867171

**Modal Dasar**
Authorized Capital

Rp6.000.000.000.000,-

**Modal Ditempatkan dan Disetor Penuh**
Issued and Fully Paid-Up Capital

Rp1.971.616.240.300,-

**Jumlah Karyawan**
Total Employees

6.387 orang pada tahun buku 2024
people in the 2024 financial year

**Customer Care**
Customer Care

**1500153**
**+62 21 501 88888**

**Media Sosial**
Social Media

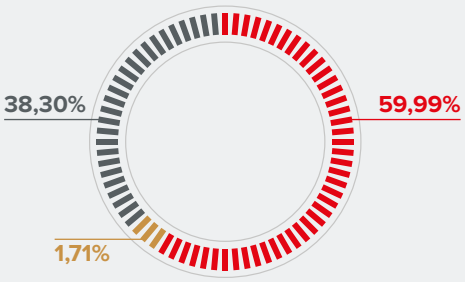
- banksinarmas
- @BankSinarmas
- Bank Sinarmas
- PT. Bank Sinarmas Tbk.
- Bank Sinarmas
- banksinarmasofficial
- +62 8822 1500 153

**Situs Web dan Email**
Website and Email

- www.banksinarmas.com
- corporate.secretary@banksinarmas.com
  care@banksinarmas.com

**Komposisi Pemegang Saham**
Shareholder Composition

- PT Sinar Mas Multiartha Tbk **59,99%**
- PT Shinta Utama **1,71%**
- Publik | Public **38,30%**






# SEKILAS BANK SINARMAS
## Bank Sinarmas at a Glance






PT. Bank Sinarmas Tbk. selanjutnya disebut Bank Sinarmas atau Bank, didirikan pada 18 Agustus 1989 dengan nama PT Bank Shinta Indonesia sebagai perusahaan yang bergerak di bidang perbankan. Bank secara bertahap melakukan pengembangan bisnis dengan memperoleh status sebagai Bank Persepsi dan Bank Umum Devisa, serta memperkuat posisi keuangan dengan meningkatkan modal disetor menjadi Rp50 miliar.

Setelah lebih dari 1 (satu) dekade menjalankan bisnis, PT. Sinarmas Multiartha Tbk. perusahaan financial services yang berada di bawah kelompok usaha Sinarmas, mengambil alih 21% saham PT Bank Shinta Indonesia yang kemudian disusul dengan perubahan logo dan nama Bank menjadi PT Bank Sinarmas. Perubahan pemegang saham mayoritas ini berdampak positif pada perkembangan bisnis. Secara bertahap, Bank memperluas jangkauan bisnis dengan mendirikan beberapa kantor cabang di beberapa kota di Indonesia.

PT. Bank Sinarmas Tbk. hereinafter referred to as Bank Sinarmas or the Bank, was established on August 18, 1989, under the name PT Bank Shinta Indonesia as a banking company. In the early stages of its business journey, the Bank gradually developed its business by obtaining status as a Tax Collection Bank and a Foreign Exchange Commercial Bank, as well as strengthening its financial position by increasing its paid-up capital to Rp50 billion.

After more than a decade in business, PT Sinarmas Multiartha Tbk, a financial services company under the Sinarmas business group, acquired 21% of the shares of PT Bank Shinta Indonesia, which was followed by a change in the Bank's logo and name to PT Bank Sinarmas. This change in majority shareholder had a positive impact on the business development. Gradually, the Bank expanded its business reach by establishing several branch offices in various cities across Indonesia.

Selain itu, Bank kembali melakukan pengembangan bisnis dengan memperoleh izin menjalankan Unit Usaha Syariah (UUS), yang selanjutnya disusul dengan aksi korporasi berupa penawaran saham perdana di Bursa Efek Indonesia pada 13 Desember 2010. Akan tetapi, dalam rangka menciptakan industri perbankan syariah nasional yang stabil dan berdaya saing, Bank melakukan spin off atas UUS menjadi Badan Usaha Syariah yang diberi nama PT Bank Nano Syariah. Langkah ini dilakukan Bank bersama-sama dengan perusahaan di dalam kelompok usaha Sinarmas, yakni PT Sinar Mas Multiartha Tbk dan PT Asuransi Sinar Mas.

Furthermore, the Bank embarked on business development by obtaining permission to operate a Sharia Business Unit (UUS), followed by a corporate action of an initial public offering on the Indonesia Stock Exchange on December 13, 2010. However, to create a stable and competitive national Islamic banking industry, the Bank conducted a spin-off of UUS into a Sharia Business Entity named PT Bank Nano Syariah. This step was taken by the Bank together with companies within the Sinarmas business group, namely PT Sinar Mas Multiartha Tbk and PT Asuransi Sinar Mas.

Di sisi lain, akselerasi penggunaan teknologi informasi telah dan terus dilakukan Bank guna mengikuti perkembangan pasar yang dinamis dan kebutuhan masyarakat yang semakin kompleks. Bank Sinarmas juga memiliki inisiatif keberlanjutan dengan menghadirkan program pembiayaan kegiatan usaha berkelanjutan (KKUB), di mana penyalurannya dipetakan pada portofolio debitur yang terbagi dalam 12 kategori sesuai Rencana Aksi Keuangan Berkelanjutan (RAKB).

On the other hand, the Bank continues to pursue acceleration in the use of information technology in order to keep up with dynamic market developments and the increasingly complex society's demand. Bank Sinarmas also has sustainability initiatives by introducing a sustainable business financing program (KKUB), where disbursements are mapped to a portfolio of debtors divided into 12 categories according to the Sustainable Finance Action Plan (SFAP).

## MAKNA LOGO BANK SINARMAS

## MEANING OF BANK SINARMAS LOGO

Logo Bank Sinarmas adalah hasil pengembangan identitas dari logo Sinar Mas yang menggambarkan kekuatan karakter perusahaan secara utuh dan jelas. Logo tersebut terinspirasi dari pancaran sinar matahari yang tak pernah berhenti bersinar serta memberikan terang kehidupan, yang merefleksikan komitmen usaha yang dijalankan Sinar Mas, baik untuk masyarakat maupun kelompok usaha yang dimiliki. Sementara lengkungan di setiap sudut logo menggambarkan karakter perusahaan yang inovatif dan adaptif dalam mengikuti perkembangan dunia.

The Bank Sinarmas logo is the result of developing the identity of the Sinar Mas logo, which portrays the strength and character of the Company completely and clearly. The logo is inspired by the radiance of the sun, which never stops shining and provides brightness for life, reflecting the commitment of Sinar Mas to its endeavors, both for society and its business groups. Meanwhile, the curves at each corner of the logo depict the innovative and adaptive character of the Company in keeping up with global developments.

Dari sisi tipografi, penulisan Bank Sinarmas tanpa huruf kapital melambangkan kesan ramah dan tidak kaku, sehingga mampu merefleksikan karakter perusahaan yang berorientasi pada pasar dan melihat peluang ke depan. Selain itu, perpaduan logo simbol dan huruf Sinar Mas yang saling terintegrasi menggambarkan Bank sebagai kelompok usaha yang utuh dan solid.

In terms of typographical perspective, the writing of Bank Sinarmas without capital letters conveys a friendly and informal impression, avoiding stiffness, thus reflecting the Company's market-oriented character and forward-looking attitude. Additionally, the combination of the symbol logo and the integrated Sinar Mas letters portrays the Bank as a cohesive and solid business group.

# JEJAK LANGKAH
## Milestones



**1989**

Pertama kali berdiri dengan nama Bank Shinta Indonesia.

Initial establishment under the name Bank Shinta Indonesia.

**2005**

- PT Sinar Mas Multiartha Tbk dan PT Shinta Utama menjadi Pemegang Saham Mayoritas Bank; dan
- Perubahan logo Bank.
- PT Sinar Mas Multiartha Tbk and PT Shinta Utama became the majority shareholders of the Bank; and
- Change of the Bank's logo.

**2006**

Perubahan nama dari PT Bank Shinta Indonesia menjadi PT Bank Sinarmas

Change of name from PT Bank Shinta Indonesia to PT Bank Sinarmas

**2009**

Mendirikan Unit Usaha Syariah

Establishing a Sharia Business Unit

**2010**

Menjadi Perusahaan Tercatat di Bursa Efek

Become a Listed Company on the Stock Exchange

**2024**

**Unit Usaha Syariah Bank Sinarmas efektif menjadi Bank Umum Syariah (PT Bank Nano Syariah) dan anak usaha Bank Sinarmas**

Bank Sinarmas Sharia Business Unit effectively became a Sharia commercial bank (PT Bank Nano Syariah) and a subsidiary of Bank Sinarmas



# VISI DAN MISI [OJK - C.1]
## Vision and Missions



### VISI Vision

**Menjadi Bank terkemuka di Indonesia dengan jaringan distribusi yang terintegrasi dan layanan yang prima.**

To become a leading bank in Indonesia with an integrated distribution network and excellent service.

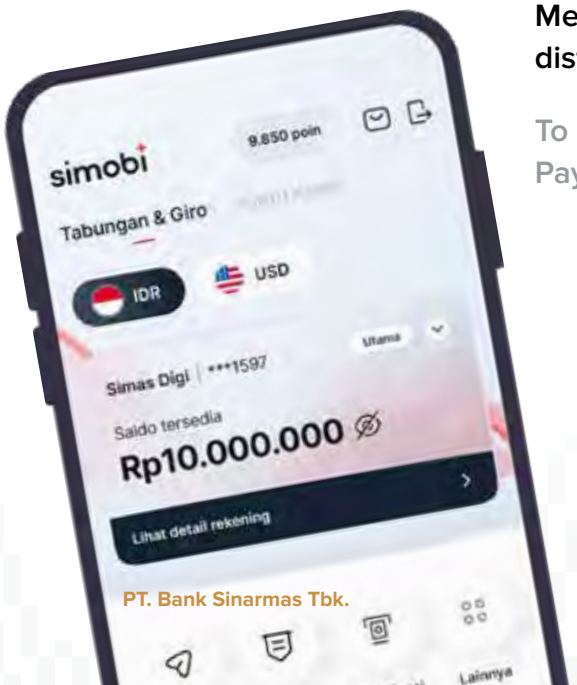


### MISI Mission

1. Membangun layanan keuangan yang prima guna memenuhi kebutuhan finansial masyarakat;
2. Meningkatkan kemampuan teknologi informasi dan sumber daya manusia dalam rangka memberikan layanan melalui *payment system* yang lengkap; dan
3. Membudayakan sistem manajemen risiko sesuai dengan prinsip kehati-hatian dan *good corporate government* (GCG).

1. To create excellent financial services to meet the community's financial needs;
2. To improve the capability of information technology and human resources to provide the best service through a comprehensive payment system; and
3. To develop a risk management system in accordance with prudential and good corporate governance (GCG) principles.

### OBJEKTIF JANGKA PANJANG Long-Term Objective




**Menjadi *Payment* & *Transaction* Bank dengan jaringan distribusi terlengkap dan terintegrasi.**

To become the most comprehensive and integrated Payment & Transaction Bank.



# TAGLINE
# BANK SINARMAS
## Bank Sinarmas Tagline

we always care

**“We Always Care”**

Kepedulian dari semua lini kerja Bank Sinarmas mengenai pentingnya pelayanan dari hati kepada nasabah, rekan kerja, rekan bisnis, masyarakat, dan lingkungan yang dilakukan secara konsisten dan perbaikan yang berkelanjutan untuk mewujudkan kepuasan dan loyalitas nasabah.

**“We Always Care”**

Concerns from all Bank Sinarmas work lines about the importance of sincere service to customers, colleagues, business partners, the community, and the environment, which is carried out consistently and continuously to achieve customer satisfaction and loyalty.

#FinansialLebihBaik

**“#FinansialLebihBaik”**

Sebagai tema besar *campaign* yang baru, #FinansialLebihBaik hadir atas kebutuhan untuk menciptakan pesan terpadu yang selaras dengan kebutuhan Nasabah Bank Sinarmas.

Kampanye ini bertujuan untuk mengomunikasikan gagasan bahwa masa depan keuangan setiap orang dapat ditingkatkan melalui kemitraan perbankan yang tepat. Kampanye ini menekankan komitmen bank dalam menyediakan solusi dan pengalaman keuangan yang luar biasa bagi semua kliennya, mulai dari Nasabah reguler hingga *high-net-worth individuals*.

Bank Sinarmas, sebagai salah satu pilar usaha Sinar Mas, juga hadir untuk menjadi penyedia solusi keuangan terpadu (*one-stop excellent financial solution*) di setiap stage kehidupan untuk menuju Finansial Lebih Baik.

**“Financially Better”**

The shift to the new umbrella campaign, #FinansialLebihBaik (translated as “Financially Better”), is driven by the need to create a unified message that resonates with Bank Sinarmas.

This campaign aims to communicate the idea that everyone’s financial future can be improved with the right banking partner. It emphasizes the Bank’s commitment to providing excellent financial solutions and experiences for all its clients, from regular customers to high-net-worth individuals.

Bank Sinarmas, as one of Sinar Mas’ business pillars, also positions itself as a one-stop provider of excellent financial solutions at every stage of life in the journey towards a better financial future.

**PT. Bank Sinarmas Tbk.**

# NILAI-NILAI LUHUR [OJK C.1][OJK F.1]
## Noble Values



**INTEGRITY**

Bertindak sesuai ucapan, janji sehingga dapat menumbuhkan kepercayaan pihak lain.

Acting on words and promises in order to gain the trust of others.



**POSITIVE ATTITUDE**

Menampilkan perilaku yang mendukung terciptanya lingkungan kerja yang saling menghargai dan kondusif.

Displaying behavior that contributes to the creation of a mutually respectful and conducive work environment.



**COMMITMENT**

Melaksanakan pekerjaan dengan sepenuh hati untuk mencapai hasil terbaik.

Carrying out the work wholeheartedly to achieve the best results.



# ETOS KERJA
## Work Ethic

| **Menjalin Hubungan Internasional**<br>International Relations | **Belajar secara Terus Menerus**<br>Constantly Learning | **Dapat Diandalkan**<br>Reliable |
|---|---|---|
| Senantiasa membina hubungan internal, eksternal, maupun secara global untuk mendukung kinerja dalam dunia bisnis.<br>**Perilaku: Proaktif, Cepat Tanggap, dan Berani**. | Mengembangkan ide dan pengetahuan serta berinovasi untuk meningkatkan nilai tambah secara terus menerus.<br>**Perilaku: Kreatif, Inovatif, dan Solutif**. | Berkomitmen untuk bekerja dengan tulus sehingga menumbuhkan keyakinan dan sangka baik berlandaskan keandalan.<br>**Perilaku: Kompeten, *Capable*, dan Jujur**. |
| Constantly fostering internal, external, and global relationships to support our performance in the business world.<br>**Behavior: Proactive, Responsive, and Brave**. | Developing ideas and knowledge, as well as innovating, to continuously increase added value.<br>**Behavior: Creative, Innovative, and Solutive**. | Being committed to working sincerely to foster faith and goodwill based on competence.<br>**Behavior: Competent, Capable, and Honest**. |



**CONTINUOUS IMPROVEMENT**

Meningkatkan kemampuan atau kapasitas diri, unit kerja, dan organisasi secara terus menerus untuk mencapai hasil terbaik.

Continuously improving our ability or capacity, work unit, and organization to achieve the best results.



**INNOVATIVE**

Memunculkan gagasan atau menciptakan produk, alat kerja, atau sistem kerja baru yang dapat meningkatkan produktivitas dan pertumbuhan perusahaan.

Generating ideas or create new products, tools, or systems that can increase productivity and company growth.



**LOYAL**

Menumbuhkembangkan semangat untuk mengerti, memahami, dan melaksanakan nilai-nilai perusahaan sebagai bagian dari keluarga besar Bank Sinarmas.

Growing the spirit to understand, comprehend, and implement corporate values as part of the Bank Sinarmas big family.

**Tangkas**
Agile

Mampu memposisikan diri, beradaptasi dan terbuka terhadap kecepatan ("velocity") perkembangan bisnis. Senantiasa selalu berjalan walaupun pelan asal tidak diam "Bu Pa Man, Zhi Pa Zhan" dimana kita tidak hanya berdiam diri dan tidak melakukan apa-apa, kita dituntut untuk cepat, tanggap, dan terus melangkah dalam setiap keadaan agar kita mampu bertahan di tengah persaingan yang ketat.
**Perilaku: Tangkas, Terbuka, dan Cerdas**.

Capable of positioning, adapting, and being open to the velocity of business development. Always moving, even if it's slow, as long as it's not silent ("Bu Pa Man, Zhi Pa Zhan"), in which we don't just sit idly by and do nothing, we must be quick, responsive, and constantly moving in every situation to survive in the face of fierce competition.
**Behavior: Agile, Open, and Intelligent**.

**Ayo Bekerja Sama**
Let's Work Together

Bekerja sama dalam mencapai tujuan Bank berdasarkan dengan sikap peduli dan menghargai ("tepa selira") agar Bank sehat, kuat, untung, dan dapat mewujudkan mimpi kita bersama.
**Perilaku: Dapat Bekerja Sama dan, Saling Menghargai**.

Cooperating in achieving the Bank's goals with a caring and respectful attitude ("tepa selira") so that the Bank is sound, strong, and profitable, and we can all realize our dreams together.
**Behavior: Mutual respect and the ability to work together**.

# KEGIATAN USAHA [OJK C.4][GRI 2-1][GRI 2-6]
## Business Activities

Kegiatan usaha Bank Sinarmas bergerak di bidang perbankan, sesuai Anggaran Dasar yang diungkapkan sebagai berikut.

The business activities of Bank Sinarmas engages in the banking sector, as stated in its Articles of Association, which are disclosed as follows.



Ikhtisar Kinerja 2024
Laporan Manajemen
PROFIL PERUSAHAAN
Analisis dan Pembahasan Manajemen
Tinjauan Pendukung Bisnis
Tata Kelola Perusahaan
Laporan Keberlanjutan

| Kegiatan Usaha yang Dijalankan pada Tahun 2024<br>Business Activities Run in 2024 | Sudah Dijalankan<br>Running | Belum Dijalankan<br>Not Yet Running |
|---|---|---|
| Menghimpun dana dari masyarakat dalam bentuk simpanan berupa giro, deposito berjangka, sertifikat deposito, tabungan, dan/atau bentuk simpanan lainnya yang dipersamakan.<br>Collecting funds from the public in the form of current accounts, time deposits, certificates of deposit, savings, and/or other equalized forms of deposits. | √ | |
| Memberikan kredit.<br>Providing loans. | √ | |
| Menerbitkan surat pengakuan utang.<br>Issuing debt certificates. | √ | |
| Membeli, menjual, atau menjamin atas risiko sendiri maupun untuk kepentingan dan atas perintah sendiri maupun untuk kepentingan dan atas perintah nasabah.<br>Buying, selling, or guaranteeing on its own behalf or for the benefit and at the order of customers | | |
| 1. Surat-surat wesel, termasuk wesel yang diakseptasi oleh Bank, yang berlakunya tidak lebih lama dari kebiasaan dalam perdagangan surat-surat yang dimaksud.<br>2. Surat pengakuan hutang dan kertas dagang lainnya yang masa berlakunya tidak lebih dari kebiasaan dalam perdagangan surat-surat yang dimaksud.<br>3. Kertas perbendaharaan negara dan surat jaminan pemerintah.<br>4. Sertifikat Bank Indonesia.<br>5. Obligasi.<br>6. Surat dagang berjangka waktu sampai dengan 1 tahun.<br>7. Instrumen surat berharga lain yang berjangka waktu sampai dengan 1 tahun.<br>1. Money orders, including accredited money orders by the Bank in which the validity period is not longer than the custom of the trade of such papers.<br>2. Debt certificates and other trade papers in which the validity period is not longer than the custom of the trade of such papers.<br>3. State treasury bills and government guarantee letter.<br>4. Bank Indonesia Certificates.<br>5. Bonds.<br>6. Short-term tradeable promissory notes with validity period of up to one year.<br>7. Other securities with validity period of up to one year. | √ | |
| Memindahkan uang, baik untuk kepentingan sendiri maupun untuk kepentingan nasabah.<br>Transferring 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 tunjuk, cek, atau sarana lainnya.<br>Placing 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 antar pihak ketiga.<br>Receiving payments from claims on securities and performing calculations with or between third parties. | √ | |

| Kegiatan Usaha yang Dijalankan pada Tahun 2024<br>Business Activities Run in 2024 | **Sudah Dijalankan**<br>Running | **Belum Dijalankan**<br>Not Yet Running |
|---|---|---|
| Menyediakan tempat untuk menyimpan barang atau surat berharga.<br>Providing place for storing valuables and securities. | √ | |
| Melakukan kegiatan penitipan untuk kepentingan pihak lain berdasarkan suatu kontrak.<br>Conducting custodial activities for the benefits of others under a contract. | √ | |
| Melakukan penempatan dana dari nasabah lainnya dalam bentuk surat berharga yang tidak tercatat di bursa efek.<br>Performing placement of funds from a customer to another customer in the form of securities that are not listed in the stock exchange. | √ | |
| Membeli melalui pelelangan agunan, baik semua maupun sebagian, dalam hal debitur tidak memenuhi kewajiban kepada bank, dengan ketentuan agunan tersebut wajib dicairkan secepatnya.<br>Purchasing a collateral, either in whole or in part, through an auction in the event that the debtor cannot meet its obligations to the Bank, provided that the purchased collateral must be disbursed immediately. | √ | |
| Melakukan kegiatan anjak piutang, usaha kartu kredit, dan kegiatan wali amanat.<br>Performing factoring activities, credit card business, and trustee activities. | √ | |
| Melakukan kegiatan dalam valuta asing dengan memenuhi ketentuan yang ditetapkan oleh Bank Indonesia.<br>Performing foreign currency-related activities by fulfilling the provisions set by Bank Indonesia. | √ | |
| Melakukan kegiatan penyertaan modal pada bank atau perusahaan lain di bidang keuangan, seperti sewa guna usaha, modal ventura, perusahaan efek, asuransi serta lembaga kliring dan penjaminan dan lembaga penyimpanan dan penyelesaian, dengan memenuhi ketentuan yang ditetapkan oleh Otoritas Jasa Keuangan.<br>Conducting equity participation in a bank or other company in the field of finance, leasing companies, venture capital firms, securities companies, insurance companies, clearing and guarantee institutions, as well as depository and settlement institutions in compliance with the provisions stipulated by Bank Indonesia. | | √ |
| Melakukan kegiatan penyertaan modal sementara untuk mengatasi kegagalan kredit, dengan syarat harus menarik kembali penyertaannya, dengan memenuhi ketentuan-ketentuan yang ditetapkan oleh Otoritas Jasa Keuangan.<br>Conducting temporary equity participation to cope with NPL, subject to withdrawal of statements in accordance with the provisions stipulated by Bank Indonesia. | | √ |
| Bertindak sebagai pendiri dana pensiun dan pengurus dana pensiun sesuai dengan ketentuan dalam peraturan perundang-undangan dana pensiun yang berlaku.<br>Acting as the pension fund's founder and administrator in accordance with applicable pension fund laws and regulations. | | √ |

[1] Pada tanggal 1 Januari 2024, pemisahan Unit Usaha Syariah Bank Sinarmas telah efektif dilakukan. Dengan dipisahkannya Unit Usaha Syariah tersebut, maka selanjutnya Bank Sinarmas tidak lagi melakukan kegiatan usaha syariah. Bank Sinarmas juga telah melakukan perubahan kegiatan usaha pada Pasal 3 Anggaran Dasar Bank Sinarmas sebagaimana termaktub dalam Akta Pernyataan Keputusan Rapat Perubahan Anggaran Dasar PT. Bank Sinarmas Tbk. No. 3 tanggal 2 Januari 2024 yang dibuat di hadapan Aulia Taufani, S.H., Notaris di Jakarta yang telah memperoleh persetujuan sesuai dengan Surat Keputusan Menteri Hukum dan Hak Asasi Manusia Republik Indonesia No. AHU-0000118.AH.01.02 Tahun 2024 tanggal 2 Januari 2024.

[1] On January 1, 2024, the spin-off of Bank Sinarmas's Sharia Business Unit was effective. With the spin-off of this Sharia Business Unit, Bank Sinarmas will no longer engage in Sharia business activities. Bank Sinarmas has also made changes to its business activities in Article 3 of the Bank's Articles of Association as stated in the Deed of Meeting Resolution of Amendments to Articles of Association of PT. Bank Sinarmas Tbk. No. 3 dated January 2, 2024, made before Aulia Taufani, S.H., a Notary in Jakarta, which has obtained approval according to the Minister of Law and Human Rights of the Republic of Indonesia Decree No. AHU-0000118.AH.01.02 of 2024 dated January 2, 2024.

# PRODUK DAN LAYANAN/JASA [OJK C.4][GRI 2-6]
## Products and Services



## *PERSONAL BANKING*

### SIMPANAN
Savings

- Deposito / Time Deposits
- Deposito On Call / On-Call Deposits
- Tabungan Simas Diamond / Simas Diamond Savings
- Tabungan Simas Bisnis / Simas Business Savings
- Tabungan Simas Gold / Simas Gold Savings
- Tabungan Simas Payroll / Simas Payroll Savings
- Tabungan Co-branding / Co-branding Savings
- Simas Tabungan Rencana / Simas Plan Savings
- Tabunganku
- Tabungan Simpanan Pelajar (SIMPEL) / Simpanan Pelajar (SIMPEL) Savings
- Simac Basic Saving Account (BSA)
- Simas Valas / Simas Foreign Exchange
- Tabungan Simas Pemodal / Simas Pemodal Savings
- Tabungan Simas Investor / Simas Investor Savings
- Tabungan Simas Digi / Simas Digi Savings
- Tabungan Rekening Dana Nasabah / Rekening Dana Nasabah Savings
- Giro Sinarmas / Sinarmas Current Account

### REKSADANA
Mutual Funds

- Danamas Rupiah Plus
- Danamas Dollar
- Danamas Pasti
- Danamas Stabil
- Simas Satu Prima
- Simas Syariah Berkembang
- Simas Satu
- Simas Saham Unggulan
- Simas Danamas Saham
- Simas Saham Maksima
- Reksa Dana Star Stable Income Fund / Star Stable Income Fund Mutual Fund
- Reksa Dana Simas Pendapatan Optima / Simas Pendapatan Optima Mutual Fund
- Reksa Dana Terproteksi Star Protected XVIII / Star Protected XVIII Protected Mutual Fund
- Reksa Dana Indeks Simas Sri Kehati / Simas Sri Kehati Index Mutual Fund
- Reksa Dana Terproteksi STAR Protected 24 / STAR Protected 24 Protected Mutual Fund

### LAYANAN INVESTASI REKSADANA
Mutual Funds Investment Service

Simas Investment Plan

### PENJAMINAN
Guarantees

- Bank Garansi / Bank Guarantee
- Kontra Bank Garansi / Counter Bank Guarantee

### *BANCASSURANCE*

- Simas Prima
- Simas KID
- Smile Hospital Plus
- Dana Sejahtera
- AsuransiKu
- Simas Income Protection
- Sinarmas Maxi Life
- Smile Medical
- Sinarmas Optima Plus
- Sinarmas Pension Plan
- Smile Flexi Link
- Smile Income Protection
- Siji Fixed Link
- Dana Kompensasi Pascakerja (DPK) DPLK Simas Jiwa / DPLK Simas Jiwa Post-employment Compensation Fund (DPK)
- Program Pensiun Iuran Pasti (PPIP) DPLK Simas Jiwa / DPLK Simas Jiwa Pension Program with Defined Contribution (PPIP)

### KARTU KREDIT
Credit Card

- Kartu Kredit Korporat / Corporate Credit Card
- Kartu Kredit Personal / Personal Credit Card



## LAYANAN BANK SINARMAS / BANK SINARMAS SERVICES

### LAYANAN DIGITAL
Digital Services

- Internet Banking
- SimobiPlus Mobile Banking
- Debit Card
- Credit Card
- Automatic Teller Machine (ATM)
- Phone Banking
- 24 Hours Customer Care
- Cardless Withdrawal
- Chat Box

### LAIN-LAIN
Other

- Safe Deposit Box
- Travelers Cheque
- Simas Holiday
- Payroll
- Bill Payment
- Giro Biller

## *BUSINESS BANKING*

### PINJAMAN
Loans

- Kredit Tanpa Agunan / Unsecured Loans
- Kredit Pemilikan Mobil / Car Ownership Loans
- Kredit Multiguna / Multipurpose Loans
- Kredit Modal Kerja / Working Capital Loans
- Kredit Investasi / Investment Loans
- Simas Dana Tunai (SDT) / Simas Cash Fund (SDT)
- Perluasan Agunan / Expansion of Collateral
- Kredit Back-to-Back / Back-to-Back Credit
- Supply Chain Financing
- Kredit Mikro KUK / KUK Micro Credit
- Kredit Usaha Rakyat (KUR) / People's Business Credit (KUR)
- KMU Petani Sawit / Palm Oil Farmers KMU
- Kredit Simas Agri / Simas Agri Loans

### EKSPOR IMPOR
Export Import

- Penagihan Dokumen Impor / Inward Documentary Collection (L/C SKBDN D/P & D/A Import)
- Penerbitan L/C SKBDN Impor / Issuance L/C SKBDN
- Perubahan L/C SKBDN / Amendment L/C SKBDN
- Advice L/C SKBDN / L/C SKBDN Advising
- Penagihan Dokumen Ekspor / Outward Documentary Collection (L/C SKDBN D/P & D/A Export)
- Diskonto Dokumen L/C SKBDN / Discount Export Document (L/C or SKBDN)
- Negosiasi Dokumen L/C SKBDN / Negotiation Export Document (L/C or SKBDN)

### *TREASURY*

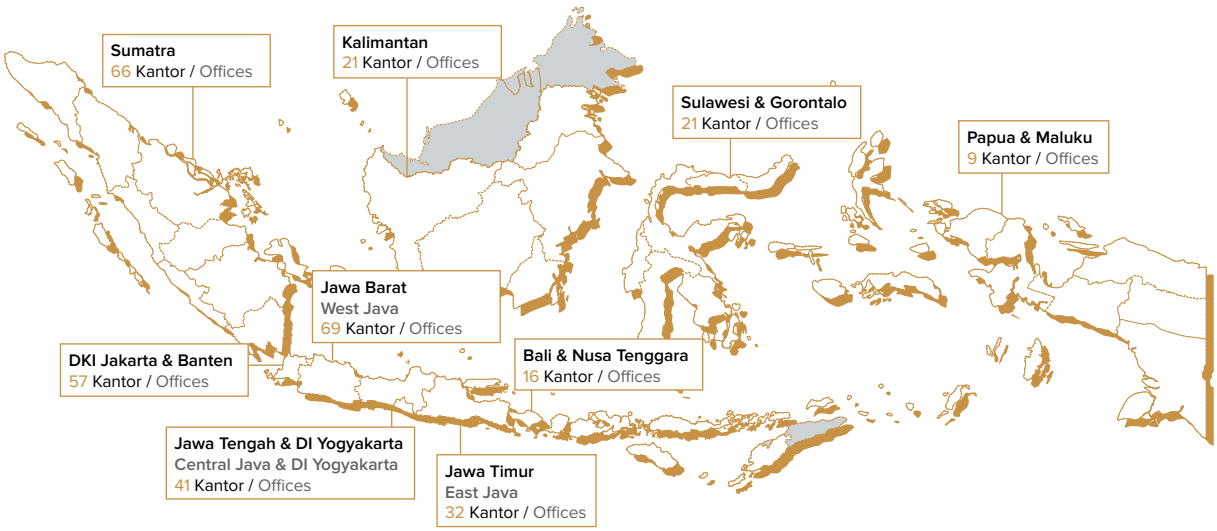
- Telegraphic Transfer (TT)
- Bank Notes (BN)
- FX Hedging (Spot/Forward/Swap)
- Deposito On Call (DOC) / On-Call Deposits
- ODA for G7

# WILAYAH OPERASIONAL DAN JARINGAN [OJK C.3]
Operational and Network Area

## WILAYAH OPERASIONAL [POJK51- C.3]
Operational Area

**JARINGAN KANTOR** Office Networks

**332** Kantor Offices




## JARINGAN KANTOR LAYANAN
Service Office Networks

### JARINGAN KANTOR
Office Networks

| Uraian | 2024 | 2023 | 2022 | Description |
|---|---|---|---|---|
| Kantor Cabang (KC) | 68 | 68 | 68 | Branch Offices |
| Kantor Cabang Pembantu (KCP) | 192 | 191 | 189 | Sub-Branch Offices |
| Kantor Fungsional Operasional (KFO) | 62 | 64 | 69 | Operational Functional Offices |
| Kantor Fungsional UMK (KF UMK) | 10 | 11 | 13 | Functional Offices for SMEs |

### JARINGAN KANTOR PER PROVINSI TAHUN 2024
Office Networks per Province 2024

| Provinsi<br>Province | KC | KCP | KFO | KF UMK | Jumlah<br>Total |
|---|---|---|---|---|---|
| Bali | 1 | 6 | 0 | 0 | 7 |
| Bangka Belitung | 2 | 2 | 0 | 0 | 4 |
| Banten | 1 | 8 | 5 | 0 | 14 |
| Bengkulu | 1 | 3 | 0 | 2 | 6 |
| Daerah Istimewa Yogyakarta I Special Region of Yogyakarta | 1 | 1 | 3 | 0 | 5 |
| DKI Jakarta | 8 | 33 | 2 | 0 | 43 |
| Gorontalo | 1 | 0 | 1 | 0 | 2 |

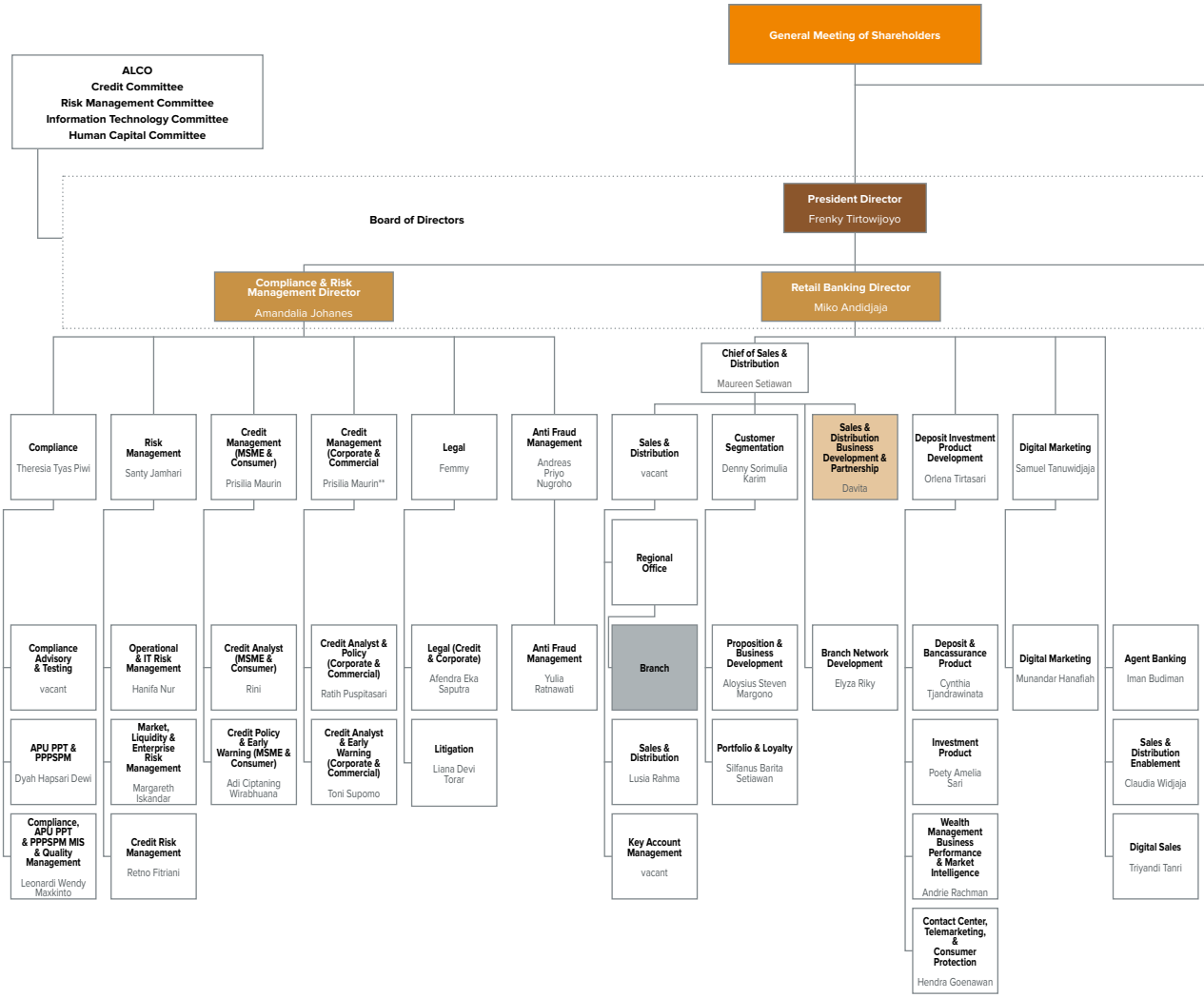
| Provinsi<br>Province | KC | KCP | KFO | KF UMK | Jumlah<br>Total |
|---|---|---|---|---|---|
| Jambi | 1 | 6 | 0 | 0 | 7 |
| Jawa Barat \| West Java | 7 | 39 | 21 | 2 | 69 |
| Jawa Tengah \| Central Java | 7 | 19 | 7 | 3 | 36 |
| Jawa Timur \| East Java | 9 | 12 | 10 | 1 | 32 |
| Kalimantan Barat \| West Kalimantan | 1 | 3 | 0 | 0 | 4 |
| Kalimantan Selatan \| South Kalimantan | 1 | 4 | 0 | 0 | 5 |
| Kalimantan Tengah \| Central Kalimantan | 1 | 2 | 1 | 0 | 4 |
| Kalimantan Timur \| East Kalimantan | 2 | 4 | 1 | 0 | 7 |
| Kalimantan Utara \| North Kalimantan | 1 | 0 | 0 | 0 | 1 |
| Kepulauan Riau | 2 | 3 | 0 | 0 | 5 |
| Lampung | 1 | 4 | 0 | 1 | 6 |
| Maluku | 1 | 0 | 1 | 0 | 2 |
| Maluku Utara \| North Maluku | 1 | 0 | 0 | 0 | 1 |
| Nusa Tenggara Barat \| West Nusa Tenggara | 1 | 3 | 1 | 0 | 5 |
| Nusa Tenggara Timur \| East Nusa Tenggara | 1 | 2 | 1 | 0 | 4 |
| Papua | 1 | 0 | 1 | 0 | 2 |
| Papua Barat \| West Papua | 0 | 1 | 0 | 0 | 1 |
| Papua Barat Daya \| Southwest Papua | 1 | 0 | 0 | 0 | 1 |
| Papua Selatan \| South Papua | 1 | 0 | 0 | 0 | 1 |
| Papua Tengah \| Central Papua | 0 | 1 | 0 | 0 | 1 |
| Riau | 2 | 6 | 0 | 0 | 8 |
| Sulawesi Barat \| West Sulawesi | 1 | 0 | 0 | 0 | 1 |
| Sulawesi Selatan \| South Sulawesi | 1 | 4 | 3 | 0 | 8 |
| Sulawesi Tengah \| Central Sulawesi | 1 | 1 | 1 | 0 | 3 |
| Sulawesi Tenggara \| Southeast Sulawesi | 1 | 1 | 2 | 0 | 4 |
| Sulawesi Utara \| North Sulawesi | 1 | 1 | 1 | 0 | 3 |
| Sumatera Barat \| West Sumatera | 1 | 2 | 0 | 1 | 4 |
| Sumatera Selatan \| South Sumatera | 1 | 11 | 0 | 0 | 12 |
| Sumatera Utara \| North Sumatera | 4 | 10 | 0 | 0 | 14 |
| **Total** | **68** | **192** | **62** | **10** | 332 |

# KEANGGOTAAN PADA ASOSIASI [OJK C.5][GRI 2-28]
## Membership in Associations

| Nama Asosiasi<br>Association Name | Status Anggota<br>Membership Status |
|---|---|
| Perhimpunan Bank Nasional (PERBANAS) / Indonesian Banks' Association (PERBANAS) | Aktif / Active |
| Asosiasi Sistem Pembayaran Indonesia (ASPI) / Indonesian Payment System Association (ASPI) | Aktif / Active |
| Asosiasi Emiten Indonesia / Indonesian Public Listed Companies Association | Aktif / Active |
| Forum Komunikasi Direktur Kepatuhan Perbankan (FKDKP) /<br>Communication Forum for Banking Compliance Director (FKDKP) | Aktif / Active |
| Lembaga Alternatif Penyelesaian Sengketa Perbankan Indonesia (LAPSPI) /<br>Indonesian Institute for Alternative Banking Dispute Resolution (LAPSPI) | Aktif / Active |
| Indonesian Corporate Secretary Association (ICSA) | Aktif / Active |
| Kamar Dagang & Industri Indonesia (KADIN) / Indonesian Chamber of Commerce and Industry (KADIN) | Aktif / Active |

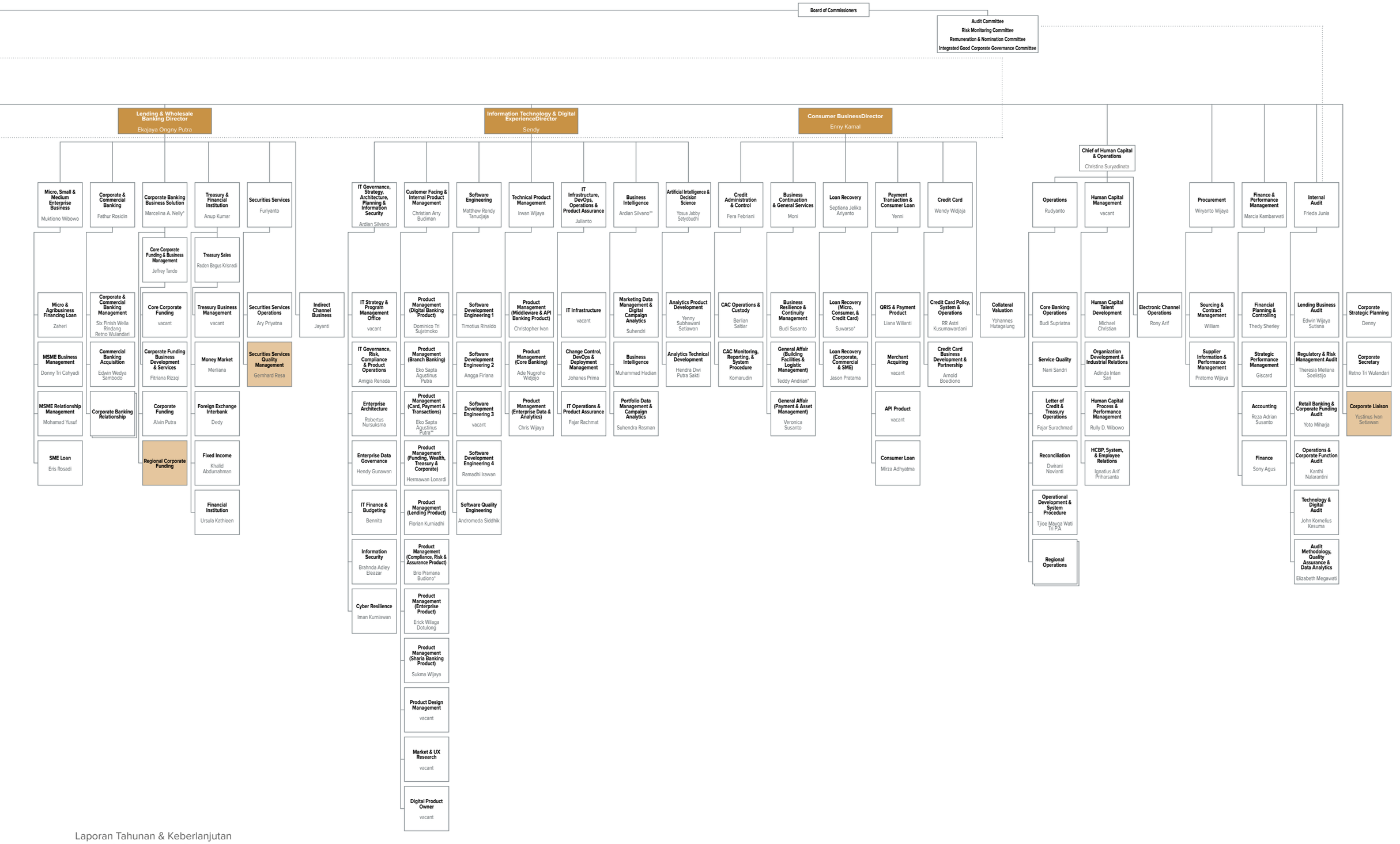
# STRUKTUR ORGANISASI
## Organizational Structure






Efektif berlaku per 2 Januari 2025
Effective as of January 2, 2025

- Jabatan Managerial
  Managerial Position
- Jabatan Individual Contributor
  Individual Contributor Position
- Karyawan Cabang
  Branch Employees
- Garis Reporting Line
  Reporting Line
- Garis Koordinasi
  Coordination Line
- * Status Penugasan Sementara
  Temporary Assignment Status
- ** Status Rangkap Jabatan
  Concurrent Position Status


Board of Commissioners
Audit Committee
Risk Monitoring Committee
Remuneration & Nomination Committee
Integrated Good Corporate Governance Committee
Lending & Wholesale Banking Director
Ekajaya Ongny Putra
Micro, Small & Medium Enterprise Business
Muktiono Wibowo
Micro & Agribusiness Financing Loan
Zaheri
MSME Business Management
Donny Tri Cahyadi
MSME Relationship Management
Mohamad Yusuf
SME Loan
Eris Rosadi
Corporate & Commercial Banking
Fathur Rosidin
Corporate & Commercial Banking Management
Six Finish Wella Rindang
Retno Wulandari
Commercial Banking Acquisition
Edwin Wedya Sambodo
Corporate Banking Relationship
Corporate Banking Business Solution
Marcelina A. Nelly*
Core Corporate Funding & Business Management
Jeffrey Tando
Core Corporate Funding
vacant
Corporate Funding Business Development & Services
Fitriana Rizqi
Corporate Funding
Alvin Putra
Regional Corporate Funding
Treasury & Financial Institution
Anup Kumar
Treasury Sales
Raden Bagus Krisnadi
Treasury Business Management
vacant
Money Market
Meriliana
Foreign Exchange Interbank
Dedy
Fixed Income
Khalid Abdurrahman
Financial Institution
Ursula Kathleen
Securities Services
Furiyanto
Securities Services Operations
Ary Priyatna
Securities Services Quality Management
Gernhard Resa
Indirect Channel Business
Jayanti
Information Technology & Digital ExperienceDirector
Sendy
IT Governance, Strategy, Architecture, Planning & Information Security
Ardian Silvano
IT Strategy & Program Management Office
vacant
IT Governance, Risk, Compliance & Product Operations
Amigia Renada
Enterprise Architecture
Robertus Nursuksma
Enterprise Data Governance
Hendy Gunawan
IT Finance & Budgeting
Bennita
Information Security
Brahnda Adley Eleazar
Cyber Resilience
Iman Kurniawan
Customer Facing & Internal Product Management
Christian Arry Budiman
Product Management (Digital Banking Product)
Dominico Tri Sujatmoko
Product Management (Branch Banking)
Eko Sapta Agustinus Putra
Product Management (Card, Payment & Transactions)
Eko Sapta Agustinus Putra**
Product Management (Funding, Wealth, Treasury & Corporate)
Hermawan Lonardi
Product Management (Lending Product)
Florian Kurniadhi
Product Management (Compliance, Risk & Assurance Product)
Brio Pramana Budiono*
Product Management (Enterprise Product)
Erick Wilaga Dotulong
Product Management (Sharia Banking Product)
Sukma Wijaya
Product Design Management
vacant
Market & UX Research
vacant
Digital Product Owner
vacant
Software Engineering
Matthew Rendy Tanudjaja
Software Development Engineering 1
Timotius Rinaldo
Software Development Engineering 2
Angga Firlana
Software Development Engineering 3
vacant
Software Development Engineering 4
Ramadhi Irawan
Software Quality Engineering
Andromeda Siddhik
Technical Product Management
Irwan Wijaya
Product Management (Middleware & API Banking Product)
Christopher Ivan
Product Management (Core Banking)
Ade Nugroho Widjojo
Product Management (Enterprise Data & Analytics)
Chris Wijaya
IT Infrastructure, DevOps, Operations & Product Assurance
Julianto
IT Infrastructure
vacant
Change Control, DevOps & Deployment Management
Johanes Prima
IT Operations & Product Assurance
Fajar Rachmat
Business Intelligence
Ardian Silvano**
Marketing Data Management & Digital Campaign Analytics
Suhendri
Business Intelligence
Muhammad Hadian
Portfolio Data Management & Campaign Analytics
Suhendra Rasman
Artificial Intelligence & Decision Science
Yosua Jabby Setyobudhi
Analytics Product Development
Yenny Subhawani Setiawan
Analytics Technical Development
Hendra Dwi Putra Sakti
Consumer BusinessDirector
Enny Kamal
Credit Administration & Control
Fera Febriani
CAC Operations & Custody
Berlian Saltiar
CAC Monitoring, Reporting, & System Procedure
Komarudin
Business Continuation & General Services
Moni
Business Resilience & Continuity Management
Budi Susanto
General Affair (Building Facilities & Logistic Management)
Teddy Andrian*
General Affair (Payment & Asset Management)
Veronica Susanto
Loan Recovery
Septiana Jelika Ariyanto
Loan Recovery (Micro, Consumer, & Credit Card)
Suwarso*
Loan Recovery (Corporate, Commercial & SME)
Jason Pratama
Payment Transaction & Consumer Loan
Yenni
QRIS & Payment Product
Liana Wilianti
Merchant Acquiring
vacant
API Product
vacant
Consumer Loan
Mirza Adhyatma
Credit Card
Wendy Widjaja
Credit Card Policy, System & Operations
RR Astri Kusumawardani
Credit Card Business Development & Partnership
Arnold Boediono
Collateral Valuation
Yohannes Hutagalung
Chief of Human Capital & Operations
Christina Suryadinata
Operations
Rudyanto
Core Banking Operations
Budi Supriatna
Service Quality
Nani Sandri
Letter of Credit & Treasury Operations
Fajar Surachmad
Reconciliation
Dwirani Novianti
Operational Development & System Procedure
Tjioe Mayga Wati Tri P.A
Regional Operations
Human Capital Management
vacant
Human Capital Talent Development
Michael Christian
Organization Development & Industrial Relations
Adinda Intan Sari
Human Capital Process & Performance Management
Rully D. Wibowo
HCBP, System, & Employee Relations
Ignatius Arif Priharsanta
Electronic Channel Operations
Rony Arif
Procurement
Wiryanto Wijaya
Sourcing & Contract Management
William
Supplier Information & Performance Management
Pratomo Wijaya
Finance & Performance Management
Marcia Kambarwati
Financial Planning & Controlling
Thedy Sherley
Strategic Performance Management
Giscard
Accounting
Reza Adrian Susanto
Finance
Sony Agus
Internal Audit
Frieda Junia
Lending Business Audit
Edwin Wijaya Sutisna
Regulatory & Risk Management Audit
Theresia Meliana Soelistijo
Retail Banking & Corporate Funding Audit
Yoto Miharja
Operations & Corporate Function Audit
Kanthi Nalarantini
Technology & Digital Audit
John Kornelius Kesuma
Audit Methodology, Quality Assurance & Data Analytics
Elizabeth Megawati
Corporate Strategic Planning
Denny
Corporate Secretary
Retno Tri Wulandari
Corporate Liaison
Yustinus Ivan Setiawan

# DEWAN KOMISARIS DAN DIREKSI
## Board of Commissioners and Directors

**SAMMY KRISTAMULJANA**
**Komisaris Independen**
Independent Commissioner

**ENNY KAMAL**
**Direktur**
Director

**SENDY**
**Direktur**
Director

**TJENDRAWATI WIDJAJA**
**Komisaris Utama**
President Commissioner

**FRENKY TIRTOWIJOYO**
**Direktur Utama**
President Director

**EKAJAYA ONGNY PUTRA**
**Direktur**
Director

**MIKO ANDIDJAJA**
**Direktur**
Director

**AMANDALIA JOHANES**
**Direktur**
Director

**RUSMIN**
**Komisaris Independen**
Independent Commissioner



# PROFIL DEWAN KOMISARIS
## Profile of the Board of Commissioners



**Tjendrawati Widjaja**
Komisaris Utama
President Commissioner

**Kewarganegaraan | Citizenship**
Indonesia

**Domisili | Domicile**
Jakarta

**Usia | Age**
61 tahun | years old

**Periode dan Dasar Hukum Pengangkatan | Term of Office and Legal Basis of Appointment**

Pertama kali diangkat sebagai Komisaris Utama berdasarkan Keputusan RUPS Luar Biasa per tanggal 21 Desember 2009 dan efektif menjabat sejak 20 April 2010 dengan akhir periode jabatan hingga dilaksanakannya RUPS Tahunan 2026.
First appointment as President Commissioner was based on the Extraordinary GMS Resolution dated December 21, 2009, and has effectively served since April 20, 2010, with the end of the term of office until the 2026 Annual GMS.

**Riwayat Pendidikan | Educational Background**
Sarjana Ekonomi, Universitas Satya Wacana, Salatiga (1986).
Bachelor of Economics, Satya Wacana University, Salatiga (1986).

**Riwayat Pekerjaan | Work Experience**
- Menjadi bagian tim inti pendirian Bank Sinarmas (d/h Bank Shinta) serta menduduki berbagai jabatan strategis, yakni:
  - Direktur Utama (2003-2010);
  - Direktur Credit dan Marketing (2002-2003);
  - Group Leader Credit dan Marketing (2001-2002);
  - Wakil Pimpinan Cabang dan Pemimpin Cabang (1992-2001);
- Assistant Manager Pemasaran PT Sulindafin (1988-1989); serta
- Manager Keuangan PT Lima Sempurna Makmur (1986).
- Part of the core team in establishing Bank Sinarmas (formerly Bank Shinta) and holding various strategic positions, namely:
  - President Director (2003-2010);
  - Director of Credit and Marketing (2002-2003);
  - Group Leader Credit and Marketing (2001-2002);
  - Vice Branch Manager and Branch Manager (1992-2001);
- Assistant Marketing Manager of PT Sulindafin (1988-1989); and
- Finance Manager of PT Lima Sempurna Makmur (1986).

**Rangkap Jabatan | Concurrent Position**
- Anggota Komite Pemantau Risiko Bank Sinarmas (sejak 2021); dan
- Anggota Komite Remunerasi dan Nominasi Bank Sinarmas (sejak 2020).
- Member of Risk Monitoring Committee of Bank Sinarmas (since 2021); and
- Member of Remuneration and Nomination Committee of Bank Sinarmas (since 2020).

**Sertifikasi Profesi | Professional Certification**
Manajemen Risiko Jenjang 7, yang dikeluarkan oleh Lembaga Sertifikasi Profesi Perbankan (LSPP).
Level 7 Risk Management, issued by the Banking Professional Certification Institute (LSPP).

**Hubungan Afiliasi | Affiliated Relationship**
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.
Has no affiliation with members of the Board of Commissioners, the Board of Directors, and Controlling Shareholders.

# PROFIL DEWAN KOMISARIS
Profile of the Board of Commissioners





**Sammy Kristamuljana**
Komisaris Independen
Independent Commissioner

**Kewarganegaraan** | **Citizenship**
Indonesia

**Domisili** | **Domicile**
Jakarta

**Usia** | **Age**
70 tahun | years old

**Periode dan Dasar Hukum Pengangkatan** | **Term of Office and Legal Basis of Appointment**

Pertama kali diangkat sebagai Komisaris Independen berdasarkan Keputusan RUPS Luar Biasa per tanggal 15 Juni 2012 dan efektif menjabat sejak 3 Juli 2012 dengan akhir periode jabatan hingga dilaksanakannya RUPS Tahunan 2026.
The first appointment as an Independent Commissioner was based on the Extraordinary GMS Resolution dated June 15, 2012, and has effectively served since July 3, 2012, with the end of the term of office until the 2026 Annual GMS.

**Riwayat Pendidikan** | **Educational Background**
- Doctor of Philosophy (PhD) bidang Strategi dan Bisnis Internasional, City University of London (1998);
- Master of Science in Management, ADL Management Education Institute, Cambridge, United States (1988); dan
- Sarjana Ekonomi jurusan Akuntansi, Universitas Indonesia (1980).
- Doctoral's degree in Philosophy (PhD) in International Strategy and Business, City University of London (1998);
- Master's degree in Science in Management, ADL Management Education Institute, Cambridge, United States (1988); and
- Bachelor's degree in Economics in Accounting, Universitas Indonesia (1980).

**Riwayat Pekerjaan** | **Work Experience**
- Rektor Universitas Prasetya Mulya (2004-2012);
- Fasilitator Indonesian Institute of Corporate Directorship (IICD) (2003-2012); dan
- Chief of Accountant Bank Dagang Nasional Indonesia (1980-1983).
- Rector of Prasetya Mulya University (2004-2012);
- Facilitator at Indonesian Institute of Corporate Directorship (IICD) (2003-2012); and
- Chief of Accountant of Bank Dagang Nasional Indonesia (1980-1983)

**Rangkap Jabatan** | **Concurrent Position**
Ketua Komite Audit Bank Sinarmas (sejak 2021).
Chairman of the Audit Committee of Bank Sinarmas (since 2021).

**Sertifikasi Profesi** | **Professional Certification**
Manajemen Risiko Jenjang 7, yang dikeluarkan oleh Lembaga Sertifikasi Profesi Perbankan (LSPP).
Level 7 Risk Management, issued by the Banking Professional Certification Institute (LSPP).

**Hubungan Afiliasi** | **Affiliated Relationship**
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.
Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders.

**Rusmin**
Komisaris Independen
Independent Commissioner

**Kewarganegaraan | Citizenship**
Indonesia

**Domisili | Domicile**
Jakarta

**Usia | Age**
65 tahun | years old

**Periode dan Dasar Hukum Pengangkatan | Term of Office and Legal Basis of Appointment**

Pertama kali diangkat sebagai Komisaris Independen berdasarkan Keputusan RUPS Luar Biasa per tanggal 13 Juni 2014 dan efektif menjabat sejak 19 Juni 2014 dengan akhir periode jabatan hingga dilaksanakannya RUPS Tahunan 2026.
The first appointment as an Independent Commissioner was based on the Extraordinary GMS Resolution dated June 13, 2013, and has effectively served since June 19, 2014, with the end of the term of office until the 2026 Annual GMS.



**Riwayat Pendidikan | Educational Background**
- Doctor, Curtin University of Technology, Australia (2007);
- Master College of Business and Public Affairs, Murray State University, United States (1994); dan
- Sarjana Ekonomi, Sekolah Tinggi Ilmu Ekonomi Yayasan Keluarga Pahlawan Negara (1986).
- Doctor, Curtin University of Technology, Australia (2007);
- Master College of Business and Public Affairs, Murray State University, United States (1994); and
- Bachelor's degree in Economics, Sekolah Tinggi Ilmu Ekonomi Yayasan Keluarga Pahlawan Negara (1986)

**Riwayat Pekerjaan | Work Experience**
- Anggota Komite Audit BNI Sekuritas (2012-2014);
- Anggota Komite Audit Bank Windu Kentjana (2009-2012);
- Dosen dan Kepala Lembaga Penelitian Manajemen dan Akuntansi Akademi Akuntansi Yayasan Keluarga Pahlawan Negara (1985-2009); serta
- Asisten Auditor Kantor Akuntan Publik Hadori & Co (1982).
- Member of the Audit Committee of BNI Sekuritas (2012-2014);
- Member of the Audit Committee of Bank Windu Kentjana (2009-2012);
- Lecturer and Head of Management and Accounting Research Institute at the Academy of Accounting, Yayasan Keluarga Pahlawan Negara (1985-2009); and
- Auditor Assistant at Public Accounting Firm Hadori & Co (1982).

**Rangkap Jabatan | Concurrent Position**
- Ketua Komite Pemantau Risiko Bank Sinarmas (sejak 2021);
- Ketua Komite Remunerasi & Nominasi Bank Sinarmas (sejak 2020);
- Anggota Majelis Kehormatan Kode Etik Badan Pemeriksa Keuangan (sejak 2019); serta
- Dosen Universitas Teknologi Yogyakarta (sejak 2009).
- Chairman of the Risk Monitoring Committee of Bank Sinarmas (since 2021);
- Chairman of the Remuneration & Nomination Committee of Bank Sinarmas (since 2020);
- Honorary Board Member of Code of Ethics of Audit Board of the Republic of Indonesia (since 2019); and
- Lecturer at Universitas Teknologi Yogyakarta (since 2009).

**Sertifikasi Profesi | Professional Certification**
Manajemen Risiko Jenjang 6, yang dikeluarkan oleh Lembaga Sertifikasi Profesi Perbankan (LSPP).
Level 6 Risk Management, issued by the Banking Professional Certification Institute (LSPP).

**Hubungan Afiliasi | Affiliated Relationship**
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.
Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders.

## PERUBAHAN KOMPOSISI DEWAN KOMISARIS

Tidak terdapat perubahan komposisi anggota Dewan Komisaris selama tahun 2024 hingga Laporan Tahunan dan Keberlanjutan ini diterbitkan.

## CHANGES IN THE BOARD OF COMMISSIONERS' COMPOSITION

There was no change in the Board of Commissioners' composition in 2024 until this Annual and Sustainability Report is published.

# PROFIL DIREKSI
## Profile of the Board of Directors





**Frenky Tirtowijoyo**
Direktur Utama
President Director

**Kewarganegaraan | Citizenship**
Indonesia

**Domisili | Domicile**
Jakarta

**Usia | Age**
48 tahun | years old

**Periode dan Dasar Hukum Pengangkatan | Term of Office and Legal Basis of Appointment**

Pertama kali diangkat sebagai Direktur Utama berdasarkan Keputusan RUPS Luar Biasa per tanggal 8 September 2017 dengan akhir periode jabatan hingga dilaksanakannya RUPS Tahunan 2026.
The first appointment as President Director was based on the Extraordinary GMS Resolution dated September 8, 2017, with the end of the term of office until the 2026 Annual GMS.

**Riwayat Pendidikan | Educational Background**
- Master of Business Administration, National University of Singapore (2009); dan
- Bachelor of Business Administration in Finance, Texas A&M University (1998).
- Master of Business Administration, National University of Singapore (2009); and
- Bachelor of Business Administration in Finance, Texas A&M University (1998).

**Riwayat Pekerjaan | Work Experience**
- Direktur Bank Sinarmas (2015-2017);
- Senior Business Analyst, Group Operational Risk Assurance, dan Senior Manager CDD Operation & Approver Standard Chartered Bank, Singapore (2007-2014);
- Senior Manager Consumer Banking Operations Standard Chartered Bank, Indonesia (2006-2007);
- Assistant Vice President Legacy Texas Bank (2003-2005);
- Credit Portfolio Manager Northern Trust Bank (2002); serta
- Banking Officer dan Senior Credit Analyst Legacy Texas Bank (1998).
- Director of Bank Sinarmas (2015-2017);
- Senior Business Analyst, Group Operational Risk Assurance, and Senior Manager of CDD Operation & Approver of Standard Chartered Bank, Singapore (2007-2014);
- Senior Manager of Consumer Banking Operations of Standard Chartered Bank, Indonesia (2006-2007);
- Assistant Vice President of Legacy Texas Bank (2003-2005);
- Credit Portfolio Manager of Northern Trust Bank (2002); and
- Banking Officer and Senior Credit Analyst of Legacy Texas Bank (1998).

**Rangkap Jabatan | Concurrent Position**
Tidak merangkap jabatan, baik pada bank, perusahaan, dan/atau lembaga lain.
Not holding concurrent positions, either at banks, companies, and/or other institutions.

**Sertifikasi Profesi | Professional Certification**
Manajemen Risiko Jenjang 7, yang dikeluarkan oleh Lembaga Sertifikasi Profesi Perbankan (LSPP).
Level 7 Risk Management, issued by the Banking Professional Certification Institute (LSPP).

**Hubungan Afiliasi | Affiliated Relationship**
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.
Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders.



**Miko Andidjaja**
Direktur *Retail Banking*
Retail Banking Director

**Kewarganegaraan** | Citizenship
Indonesia

**Domisili** | Domicile
Jakarta

**Usia** | Age
53 tahun | years old

**Periode dan Dasar Hukum Pengangkatan** | Term of Office and Legal Basis of Appointment

Pertama kali diangkat sebagai Direktur berdasarkan Keputusan RUPS Luar Biasa per tanggal 5 Desember 2018 dengan akhir periode jabatan hingga dilaksanakannya RUPS Tahunan 2026.
The first appointment as Director was based on the Extraordinary GMS Resolution dated December 5, 2018, with the end of the term of office until the 2026 Annual GMS.

**Riwayat Pendidikan** | Educational Background
- Master of Business Administration, University of East London, United Kingdom (1998); dan
- Sarjana Administrasi Bisnis, Universitas Atmajaya (1995).
- Master of Business Administration, University of East London, United Kingdom (1998); and
- Bachelor's degree in Business Administration, Universitas Atmajaya (1995).

**Riwayat Pekerjaan** | Work Experience
- National Sales and Distribution Head Bank Sinarmas (2015-2018);
- Privilege Banking Business Head Bank UOB Indonesia (2014-2015); dan
- Deposit/Funding, Investment, and Insurance (DIII) Sales Head Bank UOB Indonesia (2010-2013).
- National Sales and Distribution Head of Bank Sinarmas (2015-2018);
- Privilege Banking Business Head of Bank UOB Indonesia (2014-2015); and
- Deposit/Funding, Investment, and Insurance (DIII) Sales Head of Bank UOB Indonesia (2010-2013).

**Rangkap Jabatan** | Concurrent Position
Tidak merangkap jabatan, baik pada bank, perusahaan, dan/atau lembaga lain.
Not holding concurrent positions, either at banks, companies, and/or other institutions.

**Sertifikasi Profesi** | Professional Certification
Manajemen Risiko Jenjang 7, yang dikeluarkan oleh Lembaga Sertifikasi Profesi Perbankan (LSPP).
Level 7 Risk Management, issued by the Banking Professional Certification Institute (LSPP).

**Hubungan Afiliasi** | Affiliated Relationship
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.
Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders.

# PROFIL DIREKSI
Profile of the Board of Directors





**Ekajaya Ongny Putra**
Direktur *Lending & Wholesale Banking*
Lending & Wholesale Banking Director

**Kewarganegaraan** | Citizenship
Indonesia

**Domisili** | Domicile
Jakarta

**Usia** | Age
36 tahun | years old

**Periode dan Dasar Hukum Pengangkatan** | Term of Office and Legal Basis of Appointment

Pertama kali diangkat sebagai Direktur berdasarkan Keputusan RUPS Tahunan per tanggal 14 Juni 2022 dan efektif menjabat sejak tanggal 11 Oktober 2022 dengan akhir periode jabatan hingga dilaksanakannya RUPS Tahunan 2026.
The first appointment as Director was based on the Annual GMS Resolution dated June 14, 2022, and has effectively served since October 11, 2022, with the end of the term of office until the 2026 Annual GMS.

**Riwayat Pendidikan** | Educational Background
Sarjana Teknik Sipil, Universitas Atmajaya, Makassar (2009).
Bachelor's degree in Civil Engineering, Universitas Atmajaya, Makassar (2009).

**Riwayat Pekerjaan** | Work Experience
- Corporate Banking Group Head Bank Sinarmas (2022); dan
- Loan Recovery Group Head Bank Sinarmas (2020-2022).
- Corporate Banking Group Head of Bank Sinarmas (2022); dan
- Loan Recovery Group Head of Bank Sinarmas (2020-2022).

**Rangkap Jabatan** | Concurrent Position
Tidak merangkap jabatan, baik pada bank, perusahaan, dan/atau lembaga lain.
Not holding concurrent positions, either at banks, companies, and/or other institutions.

**Sertifikasi Profesi** | Professional Certification
Manajemen Risiko Jenjang 7, yang dikeluarkan oleh Lembaga Sertifikasi Profesi Perbankan (LSPP).
Level 7 Risk Management, issued by the Banking Professional Certification Institute (LSPP).

**Hubungan Afiliasi** | Affiliated Relationship
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.
Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders.



**Enny Kamal**
Direktur *Consumer Business*
Consumer Business Director

**Kewarganegaraan** | Citizenship
Indonesia

**Domisili** | Domicile
Jakarta

**Usia** | Age
57 tahun | years old

**Periode dan Dasar Hukum Pengangkatan** | Term of Office and Legal Basis of Appointment

Pertama kali diangkat sebagai Direktur berdasarkan Keputusan RUPS Tahunan per tanggal 27 Juni 2023 dengan akhir periode jabatan hingga dilaksanakannya RUPS Tahunan 2026.
The first appointment as Director was based on the Annual GMS Resolution dated June 27, 2023, with the end of the term of office until the 2026 Annual GMS.

**Riwayat Pendidikan** | Educational Background
Sarjana Ekonomi jurusan Akuntansi, Universitas HKBP Nommensen, Medan (1989).
Bachelor's degree in Economics in Accounting, Universitas HKBP Nommensen, Medan (1989).

**Riwayat Pekerjaan** | Work Experience
- Group Head Operations Bank Sinarmas (Januari 2023-Juni 2023); serta
- Assisstant to President Director Bank Sinarmas (2023); serta
- Kepala Kantor Wilayah V Bank Central Asia (2019-2022).
- Group Head Operations of Bank Sinarmas (January 2023-Juni 2023);
- Assistant to the President Director of Bank Sinarmas (2023); and
- Head of Regional Office V of Bank Central Asia (2019-2022).

**Rangkap Jabatan** | Concurrent Position
Tidak merangkap jabatan, baik pada bank, perusahaan, dan/atau lembaga lain.
Not holding concurrent positions, either at banks, companies, and/or other institutions.

**Sertifikasi Profesi** | Professional Certification
Manajemen Risiko Jenjang 7, yang dikeluarkan oleh Lembaga Sertifikasi Profesi Perbankan (LSPP).
Level 7 Risk Management, issued by the Banking Professional Certification Institute (LSPP).

**Hubungan Afiliasi** | Affiliated Relationship
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.
Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders.

# PROFIL DIREKSI
Profile of the Board of Directors





## Sendy

Direktur *Information Technology & Digital Experience*
Information Technology & Digital Experience Director

**Kewarganegaraan** | Citizenship
Indonesia

**Domisili** | Domicile
Jakarta

**Usia** | Age
42 tahun | years old

**Periode dan Dasar Hukum Pengangkatan** | Term of Office and Legal Basis of Appointment

Pertama kali diangkat sebagai Direktur berdasarkan Keputusan RUPS Tahunan per tanggal 27 Juni 2023 dengan akhir periode jabatan hingga dilaksanakannya RUPS Tahunan 2026.
The first appointment as Director was based on the Annual GMS Resolution dated June 27, 2023, with the end of the term of office until the 2026 Annual GMS.

**Riwayat Pendidikan** | Educational Background
Sarjana Teknik, Institut Teknologi Bandung (2001).
Bachelor's degree in Engineering, Bandung Institute of Technology (2001).

**Riwayat Pekerjaan** | Work Experience
- IT and Digital Experience Group Head Bank Sinarmas (2022-2023);
- Head of Product Sinar Mas Multiartha (2022);
- Komisaris Independen Principal Asset Management (2020-2022);
- Chairman QUEL (2019-2021);
- Direktur Utama Futuready.com (2015-2019);
- Chief Executive Officer KreditGoGo.com (2014-2015);
- Corporate Development Manager Sampoerna Strategic (2011-2014);
- Project Manager Bank Central Asia (2008-2010); dan
- Associate Boston Consulting Group (2007-2008).
- IT and Digital Experience Group Head of Bank Sinarmas (2022-2023);
- Head of Product of Sinar Mas Multiartha (2022);
- Independent Commissioner of Principal Asset Management (2020-2022);
- Chairman of QUEL (2019-2021);
- President Director of Futuready.com (2015-2019);
- Chief Executive Officer of KreditGoGo.com (2014-2015);
- Corporate Development Manager of Sampoerna Strategic (2011-2014);
- Project Manager of Bank Central Asia (2008-2010); and
- Associate of Boston Consulting Group (2007-2008).

**Rangkap Jabatan** | Concurrent Position
Tidak merangkap jabatan, baik pada bank, perusahaan, dan/atau lembaga lain.
Not holding concurrent positions, either at banks, companies, and/or other institutions.

**Sertifikasi Profesi** | Professional Certification
Manajemen Risiko Jenjang 7, yang dikeluarkan oleh Lembaga Sertifikasi Profesi Perbankan (LSPP).
Level 7 Risk Management, issued by the Banking Professional Certification Institute (LSPP).

**Hubungan Afiliasi** | Affiliated Relationship
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.
Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders.



## Amandalia Johanes

Direktur *Compliance & Risk Management*
Compliance & Risk Management Director

**Kewarganegaraan** | Citizenship
Indonesia

**Domisili** | Domicile
Jakarta

**Usia** | Age
57 tahun | years old

**Periode dan Dasar Hukum Pengangkatan** | Term of Office and Legal Basis of Appointment

Pertama kali diangkat sebagai Direktur berdasarkan Keputusan RUPS Luar Biasa per tanggal 28 Oktober 2024 dengan akhir periode jabatan hingga dilaksanakannya RUPS Tahunan 2026.
The first appointment as Director was based on the Extraordinary GMS Resolution dated October 28, 2024, with the end of the term of office until the 2026 Annual GMS.

**Riwayat Pendidikan** | Educational Background
- Magister Manajemen di Institute Technology and Business Kalbe, Jakarta (2005)
- Sarjana Akuntansi di Universitas Tarumanagara (1990)
- Master's degree in Management at Institute Technology and Business Kalbe, Jakarta (2005)
- Bachelor's degree in Accounting at Universitas Tarumanagara (1990)

**Riwayat Pekerjaan** | Work Experience
- Head of Risk Management, Compliance dan UKPN di PT Bank Index Selindo (2020)
- Kepala Satuan Kerja Manajemen Risiko pada beberapa bank, antara lain PT Bank UOB Indonesia dan PT Bank CTBC Indonesia (sejak Juni 2004)
- Management Development Program PT Bank Central Asia sebagai Kepala Bagian Operasional, Kepala Bagian Administrasi Kredit, Kepala Divisi Kredit, Kepala Divisi Credit Reviewer (sejak tahun 1992)
- Head of Risk Management, Compliance, and UKPN at PT Bank Index Selindo (2020)
- Head of Risk Management Work Unit at several banks, among others, PT Bank UOB Indonesia and PT Bank CTBC Indonesia (since June 2004)
- Management Development Program of PT Bank Central Asia as Head of Operational Department, Head of Credit Administration Department, Head of Credit Division, Head of Credit Reviewer Division (since 1992)

**Rangkap Jabatan** | Concurrent Position
Tidak merangkap jabatan, baik pada bank, perusahaan, dan/atau lembaga lain.
Not holding concurrent positions, either at banks, companies, and/or other institutions.

**Sertifikasi Profesi** | Professional Certification
- Manajemen Risiko Jenjang 7, yang dikeluarkan oleh Lembaga Sertifikasi Profesi Perbankan (LSPP).
- Certified Financial Planner (CRP)
- Qualified Wealth Planner (QWP)
- Wakil Manajer Investasi (WMI)
- Certified Enterprise Risk Management (CERG)
- Level 7 Risk Management, issued by the Banking Professional Certification Institute (LSPP).
- Certified Financial Planner (CRP)
- Qualified Wealth Planner (QWP)
- Vice Investment Manager (WMI)
- Certified Enterprise Risk Management (CERG)

**Hubungan Afiliasi** | Affiliated Relationship
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.
Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders.

## Perubahan Komposisi Anggota Direksi

Pada tahun 2024, terdapat perubahan komposisi anggota Direksi Bank Sinarmas dengan penjelasan sebagai berikut.

## Changes to the Board of Directors' Composition

In 2024, there was change in the composition of members of Bank Sinarmas' Board of Directors with the following explanation.

| **Susunan Direksi berdasarkan RUPS Tahunan tanggal 16 Mei 2024**<br>Board of Directors' Composition based on Annual GMS dated May 16, 2024 | | **Susunan Direksi berdasarkan RUPS Luar Biasa tanggal 28 Oktober 2024**<br>Board of Directors' Composition based on Extraordinary GMS dated October 28, 2024 | | **Alasan Perubahan**<br>Reason for Change |
|---|---|---|---|---|
| **Nama**<br>Name | **Jabatan**<br>Position | **Nama**<br>Name | **Jabatan**<br>Position | |
| Frenky Tirtowijoyo | Direktur Utama<br>President Director | Frenky Tirtowijoyo | Direktur Utama<br>President Director | Memperkuat susunan anggota Direksi serta disesuaikan dengan kompleksitas Bank.<br>Strengthening the Board of Directors' composition as well as being adjusted to the Bank's complexity. |
| Miko Andidjaja | Direktur<br>Director | Miko Andidjaja | Direktur<br>Director | |
| Ekajaya Ongny Putra | Direktur<br>Director | Ekajaya Ongny Putra | Direktur<br>Director | |
| Enny Kamal | Direktur<br>Director | Enny Kamal | Direktur<br>Director | |
| Sendy | Direktur<br>Director | Sendy | Direktur<br>Director | |
| | | Amandalia Johanes | Direktur<br>Director | |

# PROFIL PEJABAT EKSEKUTIF
## Profile of Executive Officers

### Andreas Priyo Nugroho
**Group Head Anti Fraud Management**

Warga Negara Indonesia, 46 tahun.
Bergabung di Bank Sinarmas sejak 2023. Sebelumnya berkarier di Bank BTPN dengan posisi terakhir sebagai Fraud Risk Analystic.

Meraih gelar Sarjana Pertanian dan Kehutanan dari Institut Pertanian Bogor tahun 2001.

Indonesian citizen, 46 years old.
Joined Bank Sinarmas in 2023. Previously had a career at Bank BTPN with the last position as Fraud Risk Analytic.

Obtained Bachelor's degree in Agriculture and Forestry from Bogor Agricultural Institute in 2001.

### Anup Kumar
**Group Head Treasury & Financial Institution**

Warga Negara Indonesia, 39 tahun.
Bergabung di Bank Sinarmas sejak 2019. Sebelumnya berkarier di PT MNC Asset Management sebagai Fix Income Fund.

Meraih gelar Magister Administrasi Bisnis dari Universitas Gadjah Mada tahun 2012.

Indonesian citizen, 39 years old.
Joined Bank Sinarmas in 2019. Previously had a career at PT MNC Asset Management as a Fixed Income Fund.

Obtained Master of Business Administration degree from Gadjah Mada University in 2012.

### Ardian Silvano
**Group Head IT Governance, Strategy, Architecture, Planning & Information Security**

Warga Negara Indonesia, 47 tahun.
Bergabung di Bank Sinarmas sejak March 2024. Sebelumnya berkarir di PT BANK JAGO sebagai HEAD OF DIGITAL PRODUCT RISK.

Meraih gelar Magister Ekonomi dari Sekolah Tinggi Manajemen Bisnis Telkom tahun 2007.

Indonesian citizen, 47 years old.
Joined Bank Sinarmas in March 2024. Previously had a career at PT BANK JAGO as the HEAD OF DIGITAL PRODUCT RISK.

Obtained Master's degree in Economics from Sekolah Tinggi Management Bisnis Telkom in 2007.

### Christian Arry Budiman
**Group Head Customer Facing & Internal Product Management**

Warga Negara Indonesia, 41 tahun.
Bergabung di Bank Sinarmas sejak 2010. Sebelumnya berkarier di KPMG dengan posisi terakhir sebagai Customer Service Officer.

Meraih gelar Sarjana Bisnis dan Manajemen dari Universitas Sahid Jakarta tahun 2001.

Indonesian citizen, 41 years old.
Joined Bank Sinarmas in 2010. Previously had a career at KPMG with the last position as Customer Service Officer.

Obtained Bachelor's degree in Business and Management from Universitas Sahid Jakarta in 2001.

### Christina Suryadinata
**Chief of Human Capital Management**

Warga Negara Indonesia, 47 tahun.
Bergabung di Bank Sinarmas sejak 2016. Sebelumnya berkarier di Bank Permata dengan posisi terakhir sebagai Senior Vice President.

Meraih gelar Sarjana Ekonomi dari Universitas Katolik Parahyangan tahun 1999

Indonesian citizen, 47 years old.
Joined Bank Sinarmas in 2016. Previously had a career at Bank Permata with the last position as Senior Vice President.

Obtained Bachelor's degree in Economics from Universitas Katolik Parahyangan in 1999.

## Davita

**Group Head Sales & Distribution Business Development & Partnership**

Warga Negara Indonesia, 46 tahun.
Bergabung di Bank Sinarmas sejak September 2006. Sebelumnya berkarir di BII sebagai Marketing.

Meraih gelar Sarjana Bisnis dan Manajemen dari Sekolah Tinggi Ilmu Ekonomi Jambi tahun 2007.

Indonesian citizen, 46 years old.
Joined Bank Sinarmas in September 2006. Previously worked at BII as a Marketing.

Obtained a Bachelor's degree in Business and Management from Jambi College of Economics in 2007.

## Denny Sorimulia Karim

**Group Head Customer Segmentation**

Warga Negara Indonesia, 53 tahun.
Bergabung di Bank Sinarmas sejak Juni 2024. Sebelumnya berkarir di BDO INDONESIA sebagai Partner / Executive Director.

Meraih gelar Sarjana Bisnis dan Manajemen dari Universitas Trisakti tahun 2001.

Indonesian citizen, 53 years old.
Joined Bank Sinarmas in June 2024. Previously had a career at BDO INDONESIA as Partner/Executive Director.

Obtained Bachelor's degree in Business and Management from Universitas Trisakti in 2001.

## Fathur Rosidin

**Group Head Corporate & Commercial Banking**

Warga Negara Indonesia, 39 tahun.
Bergabung di Bank Sinarmas melalui Management Development Program (MDP) tahun 2012.

Meraih gelar Sarjana Teknik dari Universitas Kristen Petra tahun 2007 serta Magister Bisnis dan Manajemen dari Universitas Bina Nusantara tahun 2014.

Indonesian citizen, 39 years old.
Joined Bank Sinarmas through the Management Development Program (MDP) in 2012.

Obtained Bachelor's degree in Engineering from Universitas Kristen Petra in 2007 and Master's degree in Business and Management from Universitas Bina Nusantara in 2014.

## Femmy

**Group Head Legal**

Warga Negara Indonesia, 40 tahun.
Bergabung di Bank Sinarmas sejak 2018. Sebelumnya berkarier di Maybank Indonesia dengan posisi terakhir sebagai Senior Manager.

Meraih gelar Sarjana Hukum dari Universitas Tarumanagara tahun 2005.

Indonesian citizen, 40 years old.
Joined Bank Sinarmas in 2018. Previously had a career at Maybank Indonesia with the last position as Senior Manager.

Obtained Bachelor's degree in Law from Universitas Tarumanagara in 2005.

## Fera Febriani

**Group Head Credit Administration & Control**

Warga Negara Indonesia, 51 tahun.
Memulai karier di Bank Shinta melalui Basic Banking Officer Program (BBOP) tahun 1997.

Meraih gelar Sarjana Teknik Arsitektur dari Universitas Katolik Parahyangan tahun 1996.

Indonesian citizen, 51 years old.
Started a career at Bank Shinta through Basic Banking Officer Program (BBOP) in 1997.

Obtained Bachelor's degree in Architecture from Universitas Katolik Parahyangan in 1996.

## Frieda Junia

**Group Head Internal Audit**

Warga Negara Indonesia, 52 tahun.
Bergabung di Bank Sinarmas sejak 2021. Sebelumnya berkarier di Deutsche Bank Ag dengan posisi terakhir Principal Auditor.

Meraih gelar Sarjana Ekonomi dari Universitas Pendidikan Nasional tahun 1996.

Indonesian citizen, 52 years old.
Joined Bank Sinarmas in 2021. Previously had a career at Deutsche Bank Ag with the last position as Principal Auditor.

Obtained Bachelor's degree in Economics from Universitas Pendidikan Nasional in 1996.

## Furiyanto

**Group Head Securities Services**

Warga Negara Indonesia, 57 tahun.
Bergabung di Bank Sinarmas sejak 2022. Sebelumnya berkarier di Maybank Indonesia dengan posisi terakhir sebagai Branch Manager.

Meraih gelar Sarjana Ilmu Komputer dari Universitas Gadjah Mada tahun 1990 serta Magister Bisnis dan Manajemen dari Universitas Terbuka tahun 2015.

Indonesian citizen, 57 years old.
Joined Bank Sinarmas in 2022. Previously had a career at Maybank Indonesia with the last position as Branch Manager.

Obtained Bachelor's degree in Computer Science from Universitas Gadjah Mada in 1990 and Master's degree in Business and Management from Universitas Terbuka in 2015.

## Irwan Wijaya

**Group Head Technical Product Management**

Warga Negara Indonesia, 43 tahun.
Bergabung di Bank Sinarmas sejak 2007. Sebelumnya berkarier di Fujitsu Indonesia dengan posisi terakhir sebagai Analyst Programmer.

Meraih gelar Sarjana Ilmu Komputer dari Universitas Bina Nusantara tahun 2003 dan Magister Ilmu Komputer dari Universitas Bina Nusantara tahun 2021.

Indonesian citizen, 43 years old.
Joined Bank Sinarmas in 2007. Previously had a career at Fujitsu Indonesia with the last position as Analyst Programmer.

Obtained Bachelor's degree in Computer Science from Universitas Bina Nusantara in 2003 and Master's degree in Computer Science from Universitas Bina Nusantara in 2021.

## Jeffrey Tando

**Group Head Core Corporate Funding & Business Management**

Warga Negara Indonesia, 45 tahun.
Bergabung di Bank Sinarmas sejak May 2016.

Meraih gelar Sarjana Teknik dari Universitas Trisakti tahun 2000.

Indonesian citizen, 45 years old.
Joined Bank Sinarmas in May 2016.

Obtained Bachelor's degree in Engineering from Universitas Trisakti in 2000.

## Julianto

**Group Head IT Infrastructure, DevOps, Operations, & Product Assurance**

Warga Negara Indonesia, 41 tahun.
Bergabung di Bank Sinarmas sejak April 2007.
Sebelumnya berkarir di Bintang Top Cell sebagai Marketing.

Meraih gelar Sarjana Ilmu Komputer dari Universitas Bina Nusantara tahun 2005.

Indonesian citizen, 41 years old.
Joined Bank Sinarmas in April 2007. Previously had a career at Bintang Top Cell as Marketing.

Obtained Bachelor's degree in Computer Science from Universitas Bina Nusantara in 2005.

## Marcelina A. Nelly

**Group Head Corporate Banking Business Solution**

Warga Negara Indonesia, 54 tahun.
Bergabung di Bank Sinarmas sejak 1993. Sebelumnya berkarier di Unibank dengan posisi terakhir di bagian Customer Service.

Meraih gelar Sarjana Manajemen Pemasaran dari Universitas Saint Mary's College tahun 1994.

Indonesian citizen, 54 years old.
Joined Bank Sinarmas in 1993. Previously had a career at Unibank with the last position in Customer Service.

Obtained Bachelor's degree in Marketing Management from Saint Mary's College University in 1994.

## Marcia Kambarwati

**Group Head Finance & Performance Management**

Warga Negara Indonesia, 35 tahun.
Bergabung di Bank Sinarmas sejak March 2024. Sebelumnya berkarir di Sinarmas Sekuritas sebagai Head of Risk Management.

Meraih gelar Sarjana Ekonomi dari Universitas Indonesia tahun 2012.

Indonesian citizen, 35 years old.
Joined Bank Sinarmas in March 2024. Previously had a career at Sinarmas Sekuritas as Head of Risk Management.

Obtained Bachelor's degree in Economics from Universitas Indonesia in 2012.

## Matthew Rendy Tanudjaja

**Group Head Software Engineering**

Warga Negara Indonesia, 39 tahun.
Bergabung di Bank Sinarmas sejak March 2024.

Meraih gelar Magister Teknik dari Universitas Bina Nusantara tahun 2014.

Indonesian citizen, 39 years old.
Joined Bank Sinarmas in March 2024.

Obtained Master's degree in Engineering from Universitas Bina Nusantara in 2014.

## Maureen Setiawan

**Chief of Sales & Distribution**

Warga Negara Indonesia, 48 tahun.
Bergabung di Bank Sinarmas sejak 2015. Sebelumnya berkarier di Bank UOB Indonesia dengan posisi terakhir sebagai GSM Priority Banking.

Meraih gelar Sarjana Ekonomi dari Tarakanita dan Universitas Indonesia tahun 1998.

Indonesian citizen, 48 years old.
Joined Bank Sinarmas in 2015. Previously had a career at Bank UOB Indonesia with the last position as GSM Priority Banking.

Obtained Bachelor's degree in Economics from Tarakanita and Universitas Indonesia in 1998.

## Moni

**Group Head Business Continuation & General Services**

Warga Negara Indonesia, 57 tahun.
Bergabung di Bank Sinarmas sejak 2023. Sebelumnya berkarier di Bank Central Asia dengan posisi terakhir sebagai Kepala Pengembangan Bisnis Wilayah.

Meraih gelar Ahli Madya Ekonomi dari Sekolah Tinggi Ilmu Ekonomi Harapan tahun 1989.

Indonesian citizen, 57 years old.
Joined Bank Sinarmas in 2023. Previously had a career at Bank Central Asia with the last position as Head of Regional Business Development.

Obtained Diploma in Economics from Harapan School of Economics in 1989.

## Muktiono Wibowo

**Group Head Micro, Small, & Medium Enterprise Business**

Warga Negara Indonesia, 57 tahun.
Bergabung di Bank Sinarmas sejak 2014. Sebelumnya berkarier di Bank BRI Syariah dengan posisi terakhir sebagai Micro Business Department Head.

Meraih gelar Magister Manajemen dari Universitas Persada Indonesia Y.A.I tahun 2018.

Indonesian citizen, 57 years old.
Joined Bank Sinarmas in 2014. Previously had a career at Bank BRI Syariah with the last position as Micro Business Department Head.

Obtained Master's degree in Management from Universitas Persada Indonesia Y.A.I in 2018.

## Orlena Tirtasari

**Group Head Deposit Investment Product Development**

Warga Negara Indonesia, 40 tahun.
Bergabung di Bank Sinarmas sejak 2022. Sebelumnya berkarier di Bank DBS Indonesia dengan posisi terakhir sebagai Balance Sheet Manager.

Meraih gelar Sarjana Teknik dari Universitas Katolik Indonesia Atma Jaya tahun 2006.

Indonesian citizen, 40 years old.
Joined Bank Sinarmas in 2022. Previously had a career at Bank DBS Indonesia with the last position as Balance Sheet Manager.

Obtained Bachelor's degree in Engineering from Universitas Katolik Indonesia Atma Jaya in 2006.

## Prisilia Maurin

**Group Head Credit Management (MSME & Consumer)**

Warga Negara Indonesia, 39 tahun.
Bergabung di Bank Sinarmas melalui Management Development Program (MDP) tahun 2009.

Meraih Sarjana Ilmu Komputer dari Universitas Bina Nusantara tahun 2007.

Indonesian citizen, 39 years old.
Joined Bank Sinarmas through Management Development Program (MDP) in 2009.

Obtained Bachelor's degree in Computer Science from Universitas Bina Nusantara in 2007.

## Raden Bagus Krisnadi

**Group Head Treasury Sales**

Warga Negara Indonesia, 38 tahun.
Bergabung di Bank Sinarmas sejak 2015. Sebelumnya berkarier di di PT Panin Bank Tbk sebagai Treasury - FX Management Dealer.

Meraih gelar Sarjana Ekonomi dari Universitas Bina Nusantara tahun 2009 dan Magister Bisnis dan Manajemen dari Universitas Bina Nusantara tahun 2013.

Indonesian citizen, 38 years old.
Joined Bank Sinarmas in 2015. Previously had a career at PT Panin Bank Tbk as Treasury – FX Management Dealer.

Obtained Bachelor's degree in Economics from Universitas Bina Nusantara in 2009 and Master's degree in Business and Management from Universitas Bina Nusantara in 2013.

## Rudyanto

**Group Head Operations**

Warga Negara Indonesia, 48 tahun.
Bergabung di Bank Sinarmas sejak 2002. Sebelumnya berkarier di Riimba Dana Dwikatrie dengan posisi terakhir sebagai Business Consultant.

Meraih gelar Sarjana Bisnis dan Manajemen dari Sekolah Tinggi Ilmu Ekonomi Widya Darma tahun 1999.

Indonesian citizen, 48 years old.
Joined Bank Sinarmas in 2002. Previously had a career at Riimba Dana Dwikatrie with the last position as Business Consultant.

Obtained Bachelor's degree in Business and Management from Widya Darma School of Economics in 1999.

## Samuel Tanuwidjaja

**Group Head Digital Marketing**

Warga Negara Indonesia, 44 tahun.
Bergabung di Bank Sinarmas sejak 2021. Sebelumnya berkarier di Tanihub Group dengan posisi terakhir sebagai Vice President Commercial.

Meraih gelar Master of Business Administration dari University of Melbourne tahun 2008.

Indonesian citizen, 44 years old.
Joined Bank Sinarmas in 2021. Previously had a career at Tanihub Group with the last position as Vice President Commercial.

Obtained Master's degree in Business Administration from University of Melbourne in 2008.

## Santy Jamhari

Group Head Risk Management

Warga Negara Indonesia, 42 tahun.
Bergabung di Bank Sinarmas sejak 2015. Sebelumnya berkarier di PT Bank UOB Indonesia sebagai AVP - Privilege Banking.

Meraih gelar Sarjana Ekonomi dari Universitas Tarumanagara tahun 2004.

Indonesian citizen, 42 years old.
Joined Bank Sinarmas in 2015. Previously had a career at PT Bank UOB Indonesia as AVP – Privilege Banking

Obtained Bachelor's degree in Economics from Universitas Tarumanegara in 2004.

## Septiana Jelika Ariyanto

Group Head Loan Recovery

Warga Negara Indonesia, 31 tahun.
Bergabung di Bank Sinarmas melalui Management Development Program (MDP) tahun 2015.

Meraih gelar Sarjana Ekonomi dari Universitas Tarumanagara tahun 2014.

Indonesian citizen, 31 years old.
Joined Bank Sinarmas through Management Development Program (MDP) in 2015.

Obtained Bachelor's degree in Economics from Universitas Tarumanagara in 2014.

## Wendy Widjaja

Group Head Credit Card

Warga Negara Indonesia, 55 tahun.
Bergabung di Bank Sinarmas sejak 2006. Sebelumnya berkarier di Bank Internasional Indonesia dengan posisi terakhir sebagai Kepala Bagian ATM Center.

Meraih gelar Sarjana Manajemen Pemasaran dari Institut Bisnis Indonesia tahun 1992.

Indonesian citizen, 55 years old.
Joined Bank Sinarmas in 2006. Previously had a career at Bank Internasional Indonesia with the last position as Head of ATM Center Department.

Obtained Bachelor's degree in Marketing Management from Indonesian Institute of Business in 1992.

## Wiryanto Wijaya

Group Head Procurement

Warga Negara Indonesia, 44 tahun.
Bergabung di Bank Sinarmas sejak August 2024. Sebelumnya berkarir di PT Berau Coal Energy (SinarMas Mining) sebagai Category Manager.

Meraih gelar Sarjana Teknik dari Unversitas Katholik Atma Jaya tahun 2003.

Indonesian citizen, 44 years old.
Joined Bank Sinarmas in August 2024. Previously had a career at PT Berau Coal Energy (SinarMas Mining) as Category Manager.

Obtained Bachelor's degree in Engineering from Universitas Katholik Atma Jaya in 2003.

## Yosua Jabby Setyobudhi

Group Head Artificial Intelligence & Decision Science

Warga Negara Indonesia, 41 tahun.
Bergabung di Bank Sinarmas sejak 2020. Sebelumnya berkarier di PT Kredit Rating Indonesia sebagai *Head Data Analytics*.

Meraih gelar *Magister of Science* dari The University of Western Ontario tahun 2008 dan *Magister of Economics* dari The University of Western Ontario tahun 2009.

Indonesian citizen, 41 years old.
Joined Bank Sinarmas since 2020. Previously worked at PT Kredit Rating Indonesia as Head of Data Analytics.

He earned a Master of Science degree from The University of Western Ontario in 2008 and a Master of Economics degree from The University of Western Ontario in 2009.

## Yenni

Group Head Payment Transaction & Consumer Loan

Warga Negara Indonesia, 42 tahun.
Bergabung di Bank Sinarmas sejak 2006. Sebelumnya berkarier di PT Bank OCBC NISP sebagai Branch Manager.

Meraih gelar Sarjana Agribisnis dari Institut Pertanian Bogor tahun 2005.

Indonesian citizen, 42 years old.
Joined Bank Sinarmas since 2006. Previously worked at PT Bank OCBC NISP as Branch Manager.

He earned a Bachelor's degree in Agribusiness from Bogor Agricultural University in 2005.

# DEMOGRAFI KARYAWAN [OJK C.3][GRI 2-7][GRI 2-8]
## Employee Demographic

Pada tahun 2024, karyawan Bank Sinarmas tercatat sebanyak 6.387 orang, meningkat 12% dibanding tahun 2023. Berikut komposisi karyawan Bank dalam 3 tahun terakhir.

In 2024, Bank Sinarmas' employee was recorded at 6,387 people, an increase of 12% compared to the 2023's number. The composition of the Bank's employees in the last three years is as follows.

### Komposisi Karyawan berdasarkan Jabatan
**Employee Composition by Position**

| Uraian Description | 2024 | | | 2023 | | | 2022 | | |
|---|---|---|---|---|---|---|---|---|---|
| | Pria Male | Wanita Female | Jumlah Total | Pria Male | Wanita Female | Jumlah Total | Pria Male | Wanita Female | Jumlah Total |
| Komisaris \| Commissioner | 2 | 1 | 3 | 2 | 1 | 3 | 2 | 1 | 3 |
| Top Management | 32 | 18 | 50 | 44 | 19 | 63 | 40 | 21 | 61 |
| Middle Management | 466 | 329 | 795 | 504 | 357 | 861 | 461 | 339 | 800 |
| Firstline Management | 760 | 788 | 1.548 | 780 | 892 | 1.672 | 747 | 852 | 1.599 |
| Staf \| Staff | 1.123 | 1.338 | 2.461 | 1.338 | 1.544 | 2.882 | 1.390 | 1.566 | 2.956 |
| Non-Staf \| Non-Staff | 1.457 | 73 | 1.530 | 1.689 | 61 | 1.750 | 1.646 | 82 | 1.728 |
| **Jumlah \| Total** | **3.840** | **2.547** | **6.387** | **4.357** | **2.874** | **7.231** | **4.286** | **2.861** | **7.147** |

### Komposisi Karyawan berdasarkan Usia
**Employee Composition by Age**

| Uraian Description | 2024 | | | 2023 | | | 2022 | | |
|---|---|---|---|---|---|---|---|---|---|
| | Pria Male | Wanita Female | Jumlah Total | Pria Male | Wanita Female | Jumlah Total | Pria Male | Wanita Female | Jumlah Total |
| <20 tahun \| <20 years old | 7 | 6 | 13 | 12 | 7 | 19 | 6 | 4 | 10 |
| 20-30 tahun \| 20-30 years old | 1.236 | 1.013 | 2.249 | 1.315 | 1.131 | 2.446 | 1.343 | 1.256 | 2.599 |
| 31-40 tahun \| 31-40 years old | 1.632 | 1.254 | 2.886 | 1.977 | 1.470 | 3.447 | 1.995 | 1.377 | 3.372 |
| 41-50 tahun \| 41-50 years old | 832 | 241 | 1.073 | 907 | 232 | 1.139 | 804 | 195 | 999 |
| >50 tahun \| >50 years old | 133 | 33 | 166 | 146 | 34 | 180 | 138 | 29 | 167 |
| **Jumlah \| Total** | **3.840** | **2.547** | **6.387** | **4.357** | **2.874** | **7.231** | **4.286** | **2.861** | **7.147** |

## Komposisi Karyawan berdasarkan Tingkat Pendidikan

**Employee Composition by Education Level**

| Uraian<br>Description | 2024 | | | 2023 | | | 2022 | | |
|---|---|---|---|---|---|---|---|---|---|
| | Pria<br>Male | Wanita<br>Female | Jumlah<br>Total | Pria<br>Male | Wanita<br>Female | Jumlah<br>Total | Pria<br>Male | Wanita<br>Female | Jumlah<br>Total |
| Pascasarjana \| Postgraduate | 121 | 64 | 185 | 133 | 71 | 204 | 125 | 69 | 194 |
| Sarjana \| Bachelor | 2.073 | 2.176 | 4.249 | 2.351 | 2.446 | 4.797 | 2.316 | 2.378 | 4.694 |
| Diploma \| Diploma | 204 | 232 | 436 | 212 | 294 | 506 | 232 | 320 | 552 |
| SMA \| High School | 1.414 | 71 | 1.485 | 1.629 | 61 | 1.690 | 1.569 | 91 | 1.660 |
| Lain-Lain \| Others | 28 | 4 | 32 | 32 | 2 | 34 | 44 | 3 | 47 |
| **Jumlah \| Total** | **3840** | **2.547** | **6.387** | **4.357** | **2.874** | **7.231** | **4.286** | **2.861** | **7.147** |

## Komposisi Karyawan berdasarkan Tingkat Ketenagakerjaan

**Employee Composition by Employment Status**

| Uraian<br>Description | 2024 | | | 2023 | | | 2022 | | |
|---|---|---|---|---|---|---|---|---|---|
| | Pria<br>Male | Wanita<br>Female | Jumlah<br>Total | Pria<br>Male | Wanita<br>Female | Jumlah<br>Total | Pria<br>Male | Wanita<br>Female | Jumlah<br>Total |
| Tetap \| Permanent | 2.064 | 2.161 | 4.225 | 2.295 | 2.390 | 4.685 | 2.154 | 2.313 | 4.467 |
| Kontrak \| Contract | 334 | 313 | 647 | 389 | 423 | 812 | 504 | 466 | 970 |
| Alih Daya \| Outsourcing | 1.442 | 73 | 1.515 | 1.673 | 61 | 1.734 | 1.628 | 82 | 1.710 |
| **Jumlah \| Total** | **3.840** | **2.547** | **6.387** | **4.357** | **2.874** | **7.231** | **4.286** | **2.861** | **7.147** |

## Komposisi Karyawan berdasarkan Masa Kerja

**Employee Composition by Length of Service**

| Uraian<br>Description | 2024 | | | 2023 | | | 2022 | | |
|---|---|---|---|---|---|---|---|---|---|
| | Pria<br>Male | Wanita<br>Female | Jumlah<br>Total | Pria<br>Male | Wanita<br>Female | Jumlah<br>Total | Pria<br>Male | Wanita<br>Female | Jumlah<br>Total |
| 0-1 tahun \| 0-1 year | 1.331 | 710 | 2.041 | 1.359 | 867 | 2.226 | 1.389 | 802 | 2.191 |
| >1-3 tahun \| >1-3 years | 672 | 339 | 1.011 | 1.383 | 331 | 1.714 | 1.525 | 483 | 2.008 |
| >3-5 tahun \| >3-5 years | 881 | 296 | 1.177 | 587 | 385 | 972 | 353 | 329 | 682 |
| >5-10 tahun \| >5-10 years | 603 | 623 | 1.226 | 649 | 746 | 1.395 | 715 | 839 | 1.554 |
| >10 - <20 tahun \| >10 - <20 years | 340 | 563 | 903 | 364 | 526 | 890 | 292 | 393 | 685 |
| > 20 tahun \| > 20 years | 13 | 16 | 29 | 15 | 19 | 34 | 12 | 15 | 27 |
| **Jumlah \| Total** | **3.840** | **2.547** | **6.387** | **4.357** | **2.874** | **7.231** | **4.286** | **2.861** | **7.147** |

## Komposisi Karyawan berdasarkan Jenis Kelamin

**Employee Composition by Gender**

| Uraian<br>Description | 2024 | 2023 | 2022 |
|---|---|---|---|
| **Pria** \| Male | 3.840 | 4.357 | 4.286 |
| **Wanita** \| Female | 2.547 | 2.874 | 2.861 |
| **Jumlah \| Total** | **6.387** | **7.231** | **7.147** |

## Komposisi Berdasarkan Level Jabatan dan Jenis Kelamin [S-01]
**Employee Composition by Position Level and Gender**

| Level Jabatan<br>Position Level | Laki-Laki<br>Male | | Perempuan<br>Female | |
|---|---|---|---|---|
| | **Jumlah Karyawan**<br>Number of Employees | **Persentase**<br>Percentage | **Jumlah Karyawan**<br>Number of Employees | **Persentase**<br>Percentage |
| Entry-level | 2.580 | 64,65% | 1.411 | 35,35% |
| Mid-level | 760 | 49,10% | 788 | 50,90% |
| Senior-level | 357 | 58,14% | 257 | 41,86% |
| Executive-level | 143 | 61,11% | 91 | 38,89% |
| Total Pegawai | **3.840** | 60,12% | **2474** | 50,78% |

## Komposisi Berdasarkan Rentang Usia, Level Jabatan, dan Jenis Kelamin [S-02]
**Employee Composition by Age Range, Position Level, and Gender**

| Rentang Usia (tahun)<br>Age Range (years) | Level Jabatan<br>Position Level | | | | | | | | Jumlah Pegawai<br>Number of Employees |
|---|---|---|---|---|---|---|---|---|---|
| | *Entry-level* | | *Mid-level* | | *Senior-level* | | *Executive-level* | | |
| | **Laki-Laki**<br>Male | **Perempuan**<br>Female | **Laki-Laki**<br>Male | **Perempuan**<br>Female | **Laki-Laki**<br>Male | **Perempuan**<br>Female | **Laki-Laki**<br>Male | **Perempuan**<br>Female | |
| 18-25 | 256 | 206 | 24 | 24 | 0 | 0 | 0 | 0 | 510 |
| >25-35 | 1.228 | 991 | 410 | 425 | 134 | 97 | 18 | 9 | 3.312 |
| >35-45 | 817 | 197 | 286 | 316 | 196 | 150 | 89 | 56 | 2.107 |
| >45-55 | 265 | 14 | 40 | 23 | 26 | 9 | 28 | 20 | 425 |
| >55 | 14 | 3 | 0 | 0 | 1 | 1 | 8 | 6 | 33 |

## Tingkat Pergantian Pegawai [S-03]
**Employee Turnover Rate**

| | **Jumlah Pegawai (dalam tahun pelaporan)**<br>Number of Employees (in the reporting year) | **Percentage Pegawai (dalam tahun pelaporan)**<br>Percentage Employees (in the reporting year) |
|---|---|---|
| Jumlah Pegawai resign/Pemutusan Hubungan Kerja<br>Number of Employees resign / Termination of Employment | 1.328 Pegawai/ Employee | 27,49% |
| Jumlah Pegawai Baru/pengganti<br>Number of new employees/replacements | 1.377 Pegawai/ Employee | 28,50% |

## Pegawai Sementara [S-04]
**Temporary Employee**

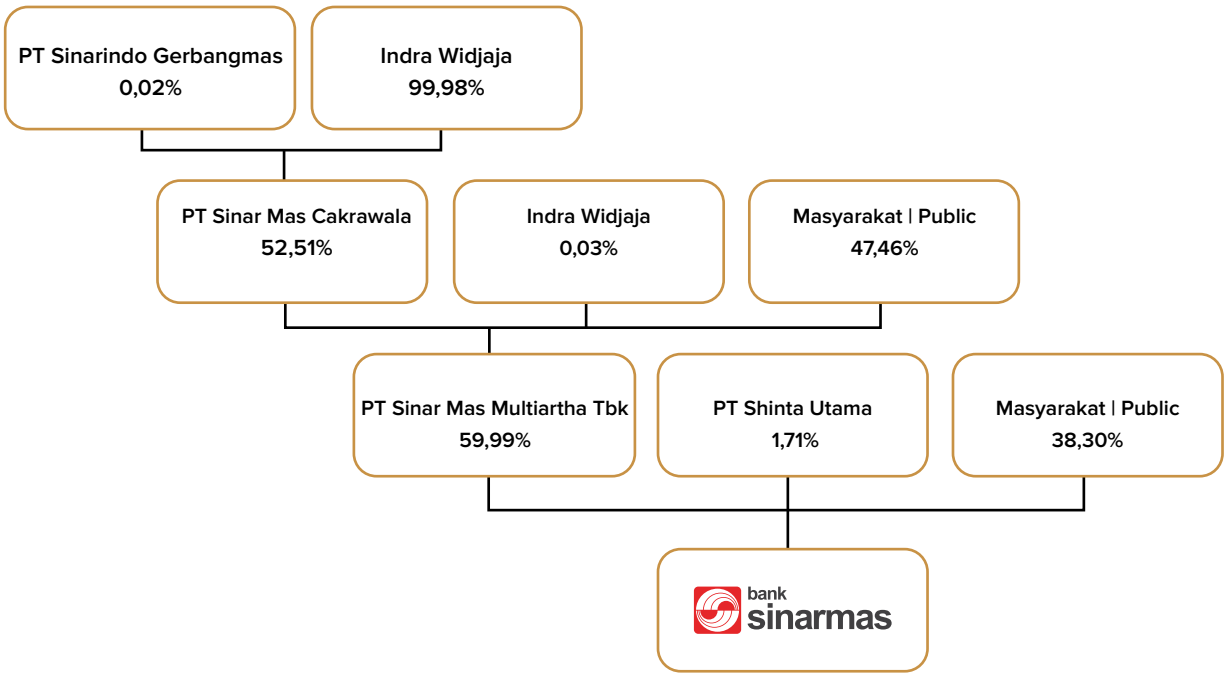
| | **Jumlah Pegawai (dalam tahun pelaporan)**<br>Number of Employees (in the reporting year) | **Percentage Pegawai (dalam tahun pelaporan)**<br>Percentage Employees (in the reporting year) |
|---|---|---|
| Jumlah Pegawai perusahaan yang dipegang oleh kontraktor dan/atau konsultan<br>Number of company employees held by contractors and/or consultants | 1.515 Pegawai/Employee | 32% |

# STRUKTUR PEMEGANG SAHAM [OJK C.3][GRI 2-1]
## Shareholders Structure



### PEMEGANG SAHAM UTAMA DAN PENGENDALI

### MAJOR AND CONTROLLING SHAREHOLDERS




Pemegang Saham Utama dan Pengendali Bank Sinarmas adalah PT Sinar Mas Multiartha Tbk (SMMA). SMMA yang tergabung dalam Grup Sinar Mas, merupakan salah satu penyedia jasa keuangan terpadu dan komprehensif, meliputi multifinance, asuransi, pasar modal, jasa administrasi saham, keamanan, perdagangan dan industri serta teknologi Informasi.

Perusahaan ini didirikan pada 21 Oktober 1982 dengan nama PT Internas Arta Leasing Company dan telah mengalami 2 (dua) kali perubahan nama menjadi PT Internas Arta Finance Company pada 1 Mei 1989 dan PT Sinar Mas Multiartha Tbk pada 25 Februari 1995.

The major and controlling shareholder of Bank Sinarmas is PT Sinar Mas Multiartha Tbk (SMMA). SMMA, which is part of Sinar Mas Group, is one of the providers of integrated and comprehensive financial services, including multi finance, insurance, capital markets, share administration services, security, trading, and industry, as well as information technology.

The Company was established on October 21, 1982, under the name PT Internas Arta Leasing Company and has undergone two name changes, first to PT Internas Arta Finance Company on May 1, 1989, and then to PT Sinar Mas Multiartha Tbk on February 25, 1995.

### Perlakuan yang Sama terhadap Seluruh Pemegang Saham

Bank Sinarmas menjamin pemegang saham, baik mayoritas maupun minoritas, memperoleh perlakukan yang sama terkait pengungkapan/keterbukaan informasi. Hal ini ditujukan agar tidak terdapat informasi pihak dalam (inside information) yang hanya diketahui oleh pemegang saham mayoritas Bank.

### Equal Treatment of All Shareholders

Bank Sinarmas ensures that shareholders, both majority and minority, receive equal treatment regarding the disclosure/transparency of information. This is aimed at preventing the existence of inside information that is only known by the Bank's major shareholders.

## Komposisi Pemegang Saham
### Shareholders Composition

| Nama Pemegang Saham<br>Name of Shareholder | 1 Januari 2024<br>January 1, 2024 | | | 31 Desember 2024<br>December 31, 2024 | | |
|---|---|---|---|---|---|---|
| | Jumlah Saham (Lembar Saham)<br>Total Shares (Share) | Nilai Saham (Rp)<br>Shares Value (Rp) | Persentase Kepemilikan (%)<br>Ownership Percentage (%) | Jumlah Saham (Lembar Saham)<br>Total Shares (Share) | Nilai Saham (Rp)<br>Shares Value (Rp) | Persentase Kepemilikan (%)<br>Ownership Percentage (%) |
| Kepemilikan Saham >5%<br>Share Ownership below 5% | | | | | | |
| PT Sinar Mas Multiartha Tbk | 11.826.853.600 | 1.182.685.360.000 | 59,99 | 11.826.853.600 | 1.182.685.360.000 | 59,99 |
| Kepemilikan Saham <5%<br>Share Ownership above 5% | | | | | | |
| PT Shinta Utama | 577.504.296 | 57.750.429.600 | 2,93 | 337.924.345 | 33.792.434.500 | 1,71 |
| Masyarakat<br>Public | 7.311.804.507 | 731.180.450.700 | 37,08 | 7.551.384.458 | 755.138.445.800 | 38,30 |
| **Jumlah**<br>**Total** | **19.716.162.403** | **1.971.616.240.300** | **100** | **19.716.162.403** | **1.971.616.240.300** | **100** |

## Kepemilikan Saham Berdasarkan Klasifikasi
### Shareholders by Classification

| Status Pemilik<br>Status of Shareholders | 1 Januari 2024<br>January 1, 2024 | | | 31 Desember 2024<br>December 31, 2024 | | |
|---|---|---|---|---|---|---|
| | Jumlah Pemegang Saham<br>Number of Shareholders | Jumlah Saham (Lembar Saham)<br>Total Shares (Share) | Persentase Kepemilikan (%)<br>Ownership Percentage (%) | Jumlah Pemegang Saham<br>Number of Shareholders | Jumlah Saham (Lembar Saham)<br>Total Shares (Share) | Persentase Kepemilikan (%)<br>Ownership Percentage (%) |
| Lokal<br>Local | | | | | | |
| Individu<br>Individual | 2144 | 958.571.372 | 4,86 | 2.355 | 1.094.282.869 | 5,55 |
| Institusi<br>Institution | 42 | 15.232.385.231 | 77,26 | 2.435 | 15.445.004.712 | 78,33 |
| Asing<br>Foreign | | | | | | |
| Individu<br>Individual | 14 | 20.147.319 | 0,1 | 15 | 15.026.277 | 0,08 |
| Institusi<br>Institution | 21 | 3.505.058.481 | 17,78 | 22 | 3.161.848.545 | 16,04 |
| **Jumlah**<br>**Total** | **2.221** | **19.716.162.403** | **100** | **4.827** | **19.716.162.403** | **100** |

## Kepemilikan Saham Dewan Komisaris dan Direksi Secara Langsung
**Direct Share Ownership of the Board of Commissioners and Board of Directors**

| Nama<br>Name | Jabatan<br>Position | 1 Januari 2024<br>January 1, 2024 | | 31 Desember 2024<br>December 31, 2024 | |
|---|---|---|---|---|---|
| | | Jumlah Saham (Lembar Saham)<br>Total Shares (Share) | Persentase Kepemilikan<br>Ownership Percentage (%) | Jumlah Saham (Lembar Saham)<br>Total Shares (Share) | Persentase Kepemilikan<br>Ownership Percentage (%) |
| Dewan Komisaris<br>Board of Commissioners | | | | | |
| Tjendrawati Widjaja | Komisaris Utama<br>President Commissioner | - | - | - | - |
| Sammy Kristamuljana | Komisaris Independen<br>Independent Commissioner | - | - | - | - |
| Rusmin | Komisaris Independen<br>Independent Commissioner | - | - | - | - |
| Direksi<br>Board of Directors | | | | | |
| Frenky Tirtowijoyo | Direktur Utama<br>President Director | - | - | - | - |
| Miko Andidjaja | Direktur<br>Director | - | - | - | - |
| Ekajaya Ongny Putra | Direktur<br>Director | - | - | - | - |
| Enny Kamal | Direktur<br>Director | 1.795.332 | 0,0091 | 1.683.501 | 0,0085 |
| Sendy | Direktur<br>Director | - | - | - | - |
| Amandalia Johanes | Direktur<br>Director | - | - | - | - |

## Kepemilikan Saham Dewan Komisaris dan Direksi Secara Tidak Langsung
Seluruh anggota Dewan Komisaris dan Direksi tidak memiliki kepemilikan tidak langsung atas saham Bank Sinarmas.

## Indirect Share Ownership of the Board of Commissioners and Board of Directors
All members of the Board of Commissioners and Board of Directors do not have indirect ownership of the shares of Bank Sinarmas.

# ENTITAS ANAK DAN ASOSIASI
## Subsidiaries and Associates

**Entitas Anak** **Subsidiary**

### ENTITAS ANAK
Subsidiary








Status Operasi
Operating Status

Beroperasi
Operating

Nama Perusahaan
Company Name

**PT Bank Nano Syariah**

Bidang Usaha
Business Field

Perbankan Syariah
Sharia Banking

Jenis Badan Hukum
Types of Legal Entity

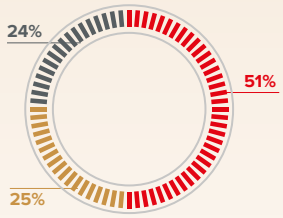
Perseroan Terbatas (PT)
Limited Liability Company (PT)

Total Aset 2024
Total Assets in 2024

**Rp9,692,526,263,225**

Kepemilikan
**Ownership**

- PT. Bank Sinarmas Tbk. **51%**
- PT Sinar Mas Multiartha Tbk **25%**
- PT Asuransi Sinarmas **24%**




Alamat Kantor Pusat
Head Office Address

Jl. Teuku Cik Ditiro Nomor 29, RT.010, RW.005, Kelurahan Menteng, Kecamatan Menteng, Kota Administrasi Jakarta Pusat

Jl. Teuku Cik Ditiro Nomor 29, RT.010, RW.005, Menteng Sub-district, Menteng District, Administrative City of Central Jakarta

nanobank syariah

**Entitas Asosiasi**
Hingga akhir tahun buku 2024, Bank Sinarmas tidak memiliki entitas asosiasi.

**Associates**
Until the end of the 2024 financial year, Bank Sinarmas did not have any associates.

# KRONOLOGI PENCATATAN SAHAM
## Chronology of Share Listing

| **Tahun** Year | **Aksi Korporasi** Corporate Action | **Jumlah Saham Diterbitkan (Lembar Saham)** Total Issued Shares (Share) | **Nilai Nominal** Nominal Value **(Rp)** | **Harga Penawaran** Offering Price **(Rp)** | **Jumlah Saham Beredar (Lembar Saham)** Total Outstanding Shares (Share) | **Jumlah Modal Disetor (Rp)** Total Paid-up Capital (Rp) |
|---|---|---|---|---|---|---|
| 2010 | Saham Pendiri<br>Founders' Shares | 5.680.500.000 | - | - | 5.680.500.000 | 568.050.000.000 |
| 2010 | Penawaran Umum Perdana<br>Initial Public Offering | 1.600.000.000 | 100 | 150 | 7.280.500.000 | 728.050.000.000 |
| 2011 | Hasil Pelaksanaan Waran Seri I<br>Results of Exercise of Series I Warrant | 1.798.369.400 | 100 | - | 9.078.869.400 | 907.886.940.000 |
| 2012 | Penawaran Umum Terbatas I<br>Limited Public Offering I | 1.203.186.138 | 100 | 250 | 10.282.055.538 | 1.028.205.553.800 |
| 2012 | Hasil Pelaksanaan Waran Seri I<br>Resuts of Exercise of Series I Warrant | 1.780.700 | 100 | - | 10.283.836.238 | 1.028.383.623.800 |
| 2013 | Hasil Pelaksanaan Waran Seri I<br>Resuts of Exercise of Series I Warrant | 7.569.399 | 100 | - | 10.291.405.637 | 1.029.140.563.700 |
| 2013 | Hasil Pelaksanaan Waran Seri II<br>Resuts of Exercise of Series II Warrant | 2.825.475.861 | 100 | - | 13.116.881.498 | 1.311.688.149.800 |
| 2014 | Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu (PMTHMETD)<br>Capital Increases Without Pre-Emptive Rights | 896.535.414 | 100 | 270 | 14.013.416.912 | 1.401.341.691.200 |
| 2014 | Hasil Pelaksanaan Waran Seri I<br>Resuts of Exercise of Series I Warrant | 19.075.400 | 100 | - | 14.032.492.312 | 1.403.249.231.200 |
| 2014 | Hasil Pelaksanaan Waran Seri II<br>Resuts of Exercise of Series II Warrant | 7.676.037 | 100 | - | 14.040.168.349 | 1.404.016.834.900 |
| 2015 | Hasil Pelaksanaan Waran Seri I<br>Resuts of Exercise of Series I Warrant | 89.744.803 | 100 | - | 14.129.913.152 | 1.412.991.315.200 |
| 2015 | Hasil Pelaksanaan Waran Seri II<br>Resuts of Exercise of Series II Warrant | 22.086.577 | 100 | - | 14.151.999.729 | 1.415.199.972.900 |

| **Tahun** Year | **Aksi Korporasi** Corporate Action | **Jumlah Saham Diterbitkan (Lembar Saham)** Total Issued Shares (Share) | **Nilai Nominal** Nominal Value **(Rp)** | **Harga Penawaran** Offering Price **(Rp)** | **Jumlah Saham Beredar (Lembar Saham)** Total Outstanding Shares (Share) | **Jumlah Modal Disetor (Rp)** Total Paid-up Capital (Rp) |
|---|---|---|---|---|---|---|
| 2016 | Penawaran Umum Terbatas II Limited Public Offering II | 1.089.274.037 | 100 | 400 | 15.241.273.766 | 1.524.127.376.600 |
| 2016 | Hasil Pelaksanaan Waran Seri II Resuts of Exercise of Series II Warrant | 10.400.570 | 100 | - | 15.251.674.336 | 1.525.167.433.600 |
| 2016 | Hasil Pelaksanaan Waran Seri III Resuts of Exercise of Series III Warrant | 30.000 | 100 | - | 15.251.704.336 | 1.525.170.433.600 |
| 2017 | Hasil Pelaksanaan Waran Seri II Resuts of Exercise of Series II Warrant | 128.423.462 | 100 | - | 15.380.127.798 | 1.538.012.779.800 |
| 2017 | Hasil Pelaksanaan Waran Seri III Resuts of Exercise of Series III Warrant | 1.675.268 | 100 | - | 15.381.803.066 | 1.538.180.306.600 |
| 2018 | Hasil Pelaksanaan Waran Seri III Resuts of Exercise of Series III Warrant | 140 | 100 | - | 15.381.803.206 | 1.538.180.320.600 |
| 2019 | Hasil Pelaksanaan Waran Seri III Resuts of Exercise of Series III Warrant | 1.600.000.000 | 100 | - | 16.981.803.206 | 1.698.180.320.600 |
| 2020 | Hasil Pelaksanaan Waran Seri III Resuts of Exercise of Series III Warrant | 480.000.100 | 100 | - | 17.461.803.306 | 1.746.180.330.600 |
| 2021 | Hasil Pelaksanaan Waran Seri III Resuts of Exercise of Series III Warrant | 2.254.359.097 | 100 | - | 19.716.162.403 | 1.971.616.240.300 |

# KRONOLOGI PENCATATAN EFEK LAINNYA
## Chronology of Other Securities Listing

Pada tanggal 29 Juni 2022, Bank Sinarmas memperoleh Pernyataan Efektif dari Otoritas Jasa Keuangan melalui Surat No.S-107/D.04/2022 untuk melaksanakan Penawaran Umum Obligasi Subordinasi Berkelanjutan I Bank Sinarmas Tahap I Tahun 2022 dengan jumlah pokok obligasi sebanyak-banyaknya Rp3.000.000.000.000,-. Aksi korporasi tersebut dilaksanakan dalam jangka waktu 5 tahun, dengan realisasi pemesanan sebesar Rp500.000.000.000, tingkat bunga tetap sebesar 6,50% per tahun, serta melibatkan PT BPD Jawa Barat dan Banten Tbk sebagai wali amanat.

On June 29, 2022, Bank Sinarmas obtained an Effective Statement from the Financial Services Authority through Letter No. S-107/D.04/2022 to carry out Public Offering of Bank Sinarmas Subordinated Bonds I Phase I Year 2022 with a principal amount of up to Rp3,000,000,000,000. This corporate action is implemented for five years, with an order for the realization of Rp500,000,000,000, a fixed interest rate of 6.50% per annum, and involves PT BPD Jawa Barat and Banten Tbk. as the trustee.



| **Nama Obligasi** Name of Bonds | **Tanggal Penerbitan** Issuance Date | **Nilai Penawaran** Offering Value | **Tingkat Bunga** Interest Rate | **Tanggal Jatuh Tempo** Maturity Date | **Peringkat** Rating | **Lembaga Pemeringkat** Rating Agency | **Bursa Saham** Stock Exchange |
|---|---|---|---|---|---|---|---|
| Obligasi Subordinasi Berkelanjutan I Bank Sinarmas Tahap I Tahun 2022 Bank Sinarmas Subordinated Bonds I Phase I Year 2022 | 29 Juni 2022 June 29, 2022 | 500.000.000.000 | 6,50% | 8 Juli 2027 July 8, 2027 | Ir A (Single A) | PT Kredit Rating Indonesia | Bursa Efek Indonesia Indonesia Stock Exchange |

Bunga Obligasi Subordinasi dibayarkan setiap 3 bulan sejak tanggal emisi, di mana pembayaran bunga pertama telah dilaksanakan pada tanggal 10 Oktober 2022 dan jatuh tempo pada tanggal 8 Juli 2027. Berikut rincian pembayaran pokok bunga untuk masing-masing Obligasi Subordinasi.

Interest on Subordinated Bonds is paid every three months from the issuance date, with the first interest payment made on October 10, 2022, and maturity on July 8, 2027. The details of the interest principal payments for each Subordinated Bond are as follows.

| **Bunga ke –** Interest Payment | **Tanggal Pembayaran Bunga Obligasi Subordinasi** Subordinated Bond Interest Payment Date | **Bunga (%)** Interest (%) | **Status Pembayaran** Payment Status |
|---|---|---|---|
| 1 | 10 Oktober 2022 I October 10, 2022 | 6,5 | Lunas I Settled |
| 2 | 17 Januari 2023 I January 17, 2023 | 6,5 | Lunas I Settled |
| 3 | 8 April 2023 I April 8, 2023 | 6,5 | Lunas I Settled |
| 4 | 8 Juli 2023 I July 8, 2023 | 6,5 | Lunas I Settled |
| 5 | 8 Oktober 2023 I October 8, 2023 | 6,5 | Lunas I Settled |
| 6 | 8 Januari 2024 I January 8, 2024 | 6,5 | Lunas I Settled |
| 7 | 8 April 2024 I April 8, 2024 | 6,5 | Lunas I Settled |
| 8 | 8 Juli 2024 I July 8, 2024 | 6,5 | Lunas I Settled |

| Bunga ke – Interest Payment | Tanggal Pembayaran Bunga Obligasi Subordinasi Subordinated Bond Interest Payment Date | Bunga (%) Interest (%) | Status Pembayaran Payment Status |
|---|---|---|---|
| 9 | 8 Oktober 2024 I October 8, 2024 | 6,5 | Lunas I Settled |
| 10 | 8 Januari 2025 I January 8, 2025 | 6,5 | Lunas I Settled |
| 11 | 8 April 2025 I April 8, 2025 | 6,5 | Lunas I Settled |
| 12 | 8 Juli 2025 I July 8, 2025 | 6,5 | Belum Lunas I Outstanding |
| 13 | 8 Oktober 2025 I October 8, 2025 | 6,5 | Belum Lunas I Outstanding |
| 14 | 8 Januari 2026 I January 8, 2026 | 6,5 | Belum Lunas I Outstanding |
| 15 | 8 April 2026 I April 8, 2026 | 6,5 | Belum Lunas I Outstanding |
| 16 | 8 Juli 2026 I July 8, 2026 | 6,5 | Belum Lunas I Outstanding |
| 17 | 8 Oktober 2026 I October 8, 2026 | 6,5 | Belum Lunas I Outstanding |
| 18 | 8 Januari 2027 I January 8, 2027 | 6,5 | Belum Lunas I Outstanding |
| 19 | 8 April 2027 I April 8, 2027 | 6,5 | Belum Lunas I Outstanding |
| 20 | 8 Juli 2027 I July 8, 2027 | 6,5 | Belum Lunas I Outstanding |

Dana yang diperoleh dari hasil penerbitan obligasi seluruhnya digunakan untuk memperkuat permodalan Bank setelah dikurangi dengan biaya-biaya emisi terkait. Dana hasil penerbitan obligasi kemudian dihitung sebagai modal pelengkap (tier 2) dalam rangka mendukung rencana penyaluran kredit dengan tenor yang lebih panjang.

The proceeds obtained from the issuance of bonds are entirely used to strengthen the Bank's capital after deducting related issuance costs. The proceeds from the issuance of bonds are then calculated as supplementary capital (tier 2) to support extending credit plans with longer tenors.

# KANTOR AKUNTAN PUBLIK
## Public Accounting Firm

| | |
|---|---|
| Nama Kantor Akuntan Publik (KAP)<br>Name of Public Accounting Firm (KAP) | Mirawati Sensi Idris |
| Alamat<br>Address | EightyEight@Kasablanka Office, Lt. 20<br>Jl. Casablanca, Kav. 28, Menteng Dalam, Tebet Jakarta Selatan 12870, Indonesia<br>EightyEight@Kasablanka Office, Lt. 20<br>Jl. Casablanca, Kav. 28, Menteng Dalam, Tebet, South Jakarta 12870, Indonesia |
| Nama Akuntan Publik (AP)<br>Name of Public Accountant (AP) | **Denny Susanto** |
| Periode Penugasan KAP & AP<br>Assignment Period of KAP & AP | Tahun Buku 2024<br>2024 Fiscal Year |
| Jasa Audit<br>Audit Service | Audit Laporan Keuangan<br>Audit of Financial Statements |
| Jasa Non-Audit<br>Non-Audit Service | - |
| Fee Audit<br>Audit Fee | **< 100.000.000 – 1.000.000.000** |
| Fee Non-Audit<br>Non-Audit Fee | - |

# LEMBAGA DAN PROFESI PENUNJANG PERUSAHAAN
## Supporting Institutions and Professions for Companies

| **Lembaga/Profesi Penunjang** Supporting Institution/ Professional | **Lembaga Pemeringkat** Rating Agency | | **Kustodian** Custodian |
|---|---|---|---|
| Nama<br>Name | PT Fitch Rating Indonesia | PT Kredit Rating Indonesia | PT Kustodian Sentral Efek Indonesia |
| Alamat<br>Address | DBS Bank Tower, Lt. 24, Suite 2403 Jl. Prof. Dr. Satrio Kav. 3-5 Jakarta 12940<br>T: +62 21 2988 6800<br>F: +62 21 2988 6822<br>DBS Bank Tower, 24th Floor, Suite 2403 Jl. Prof. Dr. Satrio Kav. 3-5 Jakarta 12940<br>Phone: +62 21 2988 6800<br>Facsimile: +62 21 2988 6822 | Sinarmas Land Plaza, Tower 3, Lt. 11 Jl. MH Thamrin No. 51 Kav. 22 Jakarta Pusat 10350<br>T: +62 21 3983 4411<br>Sinarmas Land Plaza, Tower 3, 11th Floor Jl. MH Thamrin No. 51 Kav. 22, Central Jakarta 10350<br>Phone: +62 21 3983 4411 | Gedung Bursa Efek Indonesia, Tower I, Lt. 5 Jl. Jend. Sudirman Kav. 52-53 Jakarta 12190<br>T: +62 21 515 2855<br>Gedung Bursa Efek Indonesia, Tower I, 5th Floor Jl. Jend. Sudirman Kav. 52-53 Jakarta 12190<br>Phone: +62 21 515 2855 |
| Jasa yang Diberikan<br>Services Provided | Pemeringkat kredit Bank.<br>The Bank's Credit Rating | Pemeringkat obligasi yang diterbitkan Bank.<br>Rating of bonds issued by the Bank. | Administrasi rekening efek, penyelesaian transaksi efek, distribusi hasil aksi korporasi, dan jasa-jasa terkait lainnya.<br>Administration of securities accounts, settlement of securities transactions, distribution of corporate action proceeds, and other related services. |
| Periode<br>Period | Tahun Buku 2024<br>2024 Fiscal Year | | |

| **Lembaga/Profesi Penunjang** Supporting Institution/ Professional | **Biro Administrasi Efek** Securities Administration Bureau | **Notaris** Notary | **Wali Amanat** Trustee |
|---|---|---|---|
| Nama<br>Name | PT Sinartama Gunita | Aulia Taufani, SH | PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk |
| Alamat<br>Address | Menara Tekno, Lt. 7 Jl. Fachrudin No. 19 Jakarta 10250<br>T: +62 21 392 2332<br>Menara Tekno, 7th Floor Jl. Fachrudin No. 19 Jakarta 10250<br>Phone: +62 21 392 2332 | Menara Sudirman, Lt. 17D Jl. Sudirman, Kav. 60 Jakarta Selatan 12190<br>T: +62 21 5289 2366<br>Menara Sudirman, 17D Floor Jl. Sudirman, Kav. 60 South Jakarta 12190<br>Phone: +62 21 5289 2366 | Sinarmas MSIG Tower<br>Jl. Jend. Sudiran, Kav. 21 Kel. Karet, Kec. Setiabudi Jakarta Selatan 12920<br>T: +62 21 522 8737 ext. 104<br>F: +62 21 522 8738<br>Sinarmas MSIG Tower<br>Jl. Jend. Sudiran, Kav. 21 Karet Sub-district, Setiabudi District, South Jakarta 12920<br>Phone: +62 21 522 8737 ext. 104<br>Facsimile: +62 21 522 8738 |
| Jasa yang Diberikan<br>Services Provided | Administrasi pencatatan dan perdagangan saham Bank.<br>Administration of recording and trading of Bank shares. | Pembuatan akta-akta Bank.<br>Preparing the Bank's deeds. | Perwakilan Pemegang Obligasi.<br>Bondholder Representative. |
| Periode<br>Period | Tahun Buku 2024<br>2024 Fiscal Year | | |

# INFORMASI SITUS WEB PERUSAHAAN
## Company Website

| Informasi<br>Information | Link |
|---|---|
| Profil Perusahaan<br>Company Profile | https:/www.banksinarmas.com/id/informasiumum/tentangkami/profil-bank-sinarmas |
| Informasi Umum: Nama, Alamat, Kontak Kantor Pusat, Perwakilan<br>General Information: Name, Address, Head Office Contact, Representative | https:/www.banksinarmas.com/id/informasiumum/tentangkami/profil-bank-sinarmas |
| Riwayat Singkat<br>Brief Profile | https:/www.banksinarmas.com/id/informasiumum/tentangkami/profil-bank-sinarmas |
| Struktur Organisasi<br>Organizational Structure | https:/www.banksinarmas.com/id/informasiumum/tentangkami/struktur-organisasi |
| Struktur Kepemilikan<br>Ownership Structure | https:/www.banksinarmas.com/id/informasiumum/hubunganinvestor/struktur-kepemilikan-saham-dan- informasi-saham |
| Struktur Grup<br>Group Structure | - |
| Informasi bagi Investor<br>Information for Investors | https:/www.banksinarmas.com/id/informasiumum/hubunganinvestor |
| Prospektus Penawaran Umum<br>Prospectus of Public Offering | https:/www.banksinarmas.com/id/informasiumum/hubunganinvestor/prospektus |
| Laporan Tahunan selama 5 Tahun<br>Annual Report (5 Years) | https:/www.banksinarmas.com/id/informasiumum/hubunganinvestor/laporan-tahunan |
| Kode Etik<br>Code of Ethics | https:/www.banksinarmas.com/id/informasiumum/tatakelola/terkait-etik-pedoman |
| Profil Dewan Komisaris<br>Profile of the Board of Commissioners | https:/www.banksinarmas.com/id/informasiumum/tentangkami/managemen-bank-sinarmas |
| Profil Direksi<br>Profile of the Board of Directors | https:/www.banksinarmas.com/id/informasiumum/tentangkami/managemen-bank-sinarmas |
| Kinerja<br>Performance | https:/www.banksinarmas.com/id/informasiumum/hubunganinvestor |
| Laporan Keuangan Tahunan Terpisah<br>Separate Annual Financial Statements | https:/www.banksinarmas.com/id/informasiumum/hubunganinvestor/publikasi-keuangan |
| Tata Kelola Perusahaan<br>Corporate Governance | https:/www.banksinarmas.com/id/informasiumum/tatakelola |
| Piagam Dewan Komisaris<br>Board of Commissioners Charter | https:/www.banksinarmas.com/id/informasiumum/ tatakelola/pdf-pedoman-dewan-komisaris |
| Piagam Direksi<br>Board of Directors Charter | https:/www.banksinarmas.com/id/informasiumum/ tatakelola/pdf-pedoman-direksi |
| Piagam Komite Audit<br>Audit Committee Charter | https:/www.banksinarmas.com/id/informasiumum/ tatakelola/piagam-komite-audit2 |
| Piagam Komite Nominasi dan Remunerasi<br>Nomination and Remuneration Committee Charter | https://www.banksinarmas.com/id/informasiumum/tatakelola/piagam-komite-renumerasi-dan-nominasi |
| Piagam Audit Internal<br>Internal Audit Charter | https:/www.banksinarmas.com/id/informasiumum/ tatakelola / piagam-audit-intern |
| Tanggung Jawab Sosial Perusahaan<br>Corporate Social Responsibility | https:/www.banksinarmas.com/id/informasiumum/corporatesecretary/tanggung-jawab-sosial-perusahaan |

# NAMA DAN ALAMAT KANTOR CABANG, KANTOR CABANG PEMBANTU, KANTOR FUNGSIONAL OPERASIONAL, KANTOR FUNGSIONAL UMK

## Name and Address of Branch Offices, Sub-Branch Offices, Functional Offices and Functional Offices for SMEs



### SUMATERA UTARA
**NORTH SUMATERA**

**Kantor Cabang**
Branch Offices

| | | |
|---|---|---|
| **Medan - Mangkubumi**<br>Jl. Mangkubumi No. 18 Kel. Awur, Kec. Medan Maimun, Kota Medan, Sumatera Utara 20151<br>T: +62 61 4578 182<br>F: +62 61 4578 177 | **Rantau Prapat - Sisingamangaraja**<br>Jl. Sisingamangaraja, Kel. Bakaran Batu, Kec. Rantau Selatan, Kab. Labuhan Batu, Sumatera Utara 21421<br>T: +62 624 327 377<br>F: +62 624 327 689 | **Pematang Siantar - HOS Cokroaminoto**<br>Jl. HOS Cokroaminoto No. 21 RT. 003 RW. 004, Kel. Melayu, Kec. Siantar Utara, Kota Pematang Siantar, Sumatera Utara 21144<br>T: +62 622 434 991<br>F: +62 622 434 973 |
| **Padang Sidempuan - Merdeka**<br>Komp. Citiwalk Sidempuan Blok C No. 10 Jl. Merdeka, Kel. Kantin, Kec. Padang Sidempuan Utara, Kota Padang Sidempuan, Sumatera Utara 22711<br>T: +62 634 23234<br>F: +62 634 27053 | | |

**Kantor Cabang Pembantu**
Sub-Branch Offices

| | | |
|---|---|---|
| **Gunung Krakatau - Medan**<br>Jl. Gunung Krakatau No. 46 B Kel. Glugur Darat I, Kec. Medan Timur, Kota Medan, Sumatera Utara 20236<br>T: +62 61 6643 687<br>F: +62 61 6641 158 | **Asia - Medan**<br>Jl. Asia No. 214 C, Kel. Sei Rengas II, Kec. Medan Area, Kota Medan, Sumatera Utara 20214<br>T: +62 61 7321 822<br>F: +62 61 7321 816 | **Letda Sudjono - Medan**<br>Jl. Letda Sudjono No. 252, Kel. Medan Estate, Kec. Percut Sei Tuan, Kab. Deli Serdang, Sumatera Utara 20371<br>T: +62 61 7354 106<br>F: +62 61 7354 116 |
| **Diski - Deli Serdang**<br>Jl. Medan Binjai KM 11,2 No. 62 E, Kel. Mulyorejo, Kec. Sunggal, Kab. Deli Serdang, Sumatera Utara 20351<br>T: +62 61 8454 849<br>F: +62 61 8454 815 | **Kisaran - Asahan**<br>Jl. HOS Cokroaminoto No. 72C, Kel. Kisaran Kota, Kec. Kota Kisaran Barat, Kab. Asahan, Sumatera Utara 21215<br>T: +62 623 345 052<br>F: +62 623 345 644 | **Kapt. F. Tendean - Tebing Tinggi**<br>Jl. Kapt. F. Tendean No. 155 D/4, Kel. Bajenis, Kec. Bandar Sakti, Kota Tebing Tinggi, Sumatera Utara 20614<br>T: +62 621 3950 039<br>F: +62 621 3950 040 |
| **Pasar Baru - Sibolga**<br>Jl. Mesjid No. 57, Kel. Pasar Baru, Kec. Sibolga Kota, Kota Sibolga, Sumatera Utara 22513<br>T: +62 631 21880<br>F: +62 631 21558 | **Sisingamangaraja - Medan**<br>Gedung Asuransi Sinarmas<br>Jl. Sisingamangaraja No. 1 KM 6,7 (simpang marendal), Kel. Harjosari, Kec. Medan Amplas, Kota Medan, Sumatera Utara 20147<br>T: +62 61 7874 222<br>F: +62 61 7874 229 | **M. Yamin - Medan**<br>Gedung KBRU Jl. Prof. HM Yamin No. 36 A, Kel. Sidodadi, Kec. Medan Timur, Kota Medan, Sumatera Utara 20234<br>T: +62 61 8881 2990<br>F: +62 61 8881 2293 |
| **Imam Bonjol - Labuhan Batu**<br>Jl. Imam Bonjol No. 4C, Kel. Cendana, Kec. Rantau Utara, Kab. Labuhan Batu, Sumatera Utara 21417<br>T: +62 624 325 853<br>F: +62 624 327 747 | | |

## SUMATERA BARAT
### WEST SUMATERA

**Kantor Cabang dan Kantor Cabang Pembantu**
Branch Offices and Sub-Branch Offices

| | | |
|---|---|---|
| **KC Padang - Damar**<br>Jl. Damar No. 67A RT. 001 RW. 004, Kel. Olo Ladang Padang Barat, Kec. Padang Barat, Kota Padang, Sumatera Barat 25116<br>T: +62 751 811 938<br>F: +62 751 811 936 | **KCP Sutomo - Padang**<br>Jl. Dr Sutomo No. 80 D, Kel. Kubu Marapalam, Kec. Padang Timur, Kota Padang, Sumatera Barat 25125<br>T: +62 751 891 801 / 802<br>F: +62 751 891 803 | **KCP Ahmad Karim - Bukittinggi**<br>Jl. Ahmad Karim No. 18C RT. 002 RW. 002, Kel. Benteng Pasar Atas, Kec. Guguak Panjang, Kota Bukittinggi, Sumatera Barat 26113<br>T: +62 752 626 529<br>F: +62 752 626 528 |
| KF-UMK A Yani – Payakumbuh<br>Jl. A Yani, Kel. Nunang, Kec. Payakumbuh Barat, Kota Payakumbuh, Sumatera Barat 26221<br>T : -<br>F : - | | |

## RIAU

**Kantor Cabang**
Branch Offices

| | |
|---|---|
| **Pekanbaru - Riau**<br>Jl. Riau No. 105 RT. 003 RW. 005, Kel. Padang Terubuk, Kec. Senapelan, Kota Pekanbaru, Riau 28155<br>T: +62 761 33888<br>F: +62 761 33839 | **Dumai - Sudirman**<br>Jl. Jenderal Sudirman No. 250, Kel. Teluk Binjai, Kec. Dumai, Kota Dumai, Riau 28811<br>T: +62 765 35870<br>F: +62 765 35872 |

**Kantor Cabang Pembantu**
Sub-Branch Offices

| | | |
|---|---|---|
| **Belilas - Indragiri Hulu**<br>Jl. Lintas Timur RT. 018 RW. 005 Simpang Belilas, Kel. Pangkalan Kasai, Kec. Seberida, Kab. Indragiri Hulu, Riau 29371<br>T: +62 769 324 186<br>F: +62 769 324 143 | **Perawang - Siak**<br>Jl. Raya Minas-Perawang KM 26, Komp. IKPP Perawang, Desa/Kel. Pinang Sebatang, Kec. Tualang, Kab. Siak, Riau 28772<br>T: +62 761 92420<br>F: +62 761 92429 | **Duri - Bengkalis**<br>Jl. Jend. Sudirman No. 446 C Duri, Kel. Air Jamban, Kec. Mandau, Kab. Bengkalis, Riau 28784<br>T: +62 765 594 383<br>F: +62 765 594 380 |
| **Sudirman - Pekanbaru**<br>Gallery Smartfren Pekanbaru Jl. Sudirman No. 444, Kel. Tanah Datar, Kec. Pekanbaru Kota, Kota Pekanbaru, Riau 28115<br>T: +62 761 848 789<br>F: +62 761 7894 180 | **Tuanku Tambusai - Pekanbaru**<br>Jl. Tuanku Tambusai No. 223D RT. 001 RW. 003, Kel. Wonorejo, Kec. Marpoyan Damai, Kota Pekanbaru, Riau 28125<br>T: +62 761 7866 060<br>F: +62 761 7866 161 | **Soekarno Hatta - Kampar**<br>KUD Berkat Ridho Jl. Soekarno Hatta SP-2 RT. 005 RW. 002, Desa/Kel. Petapaha, Kec. Tanpung Hilir, Kab. Kampar, Riau 28464<br>T : 08117577660<br>F : - |

## KEPULAUAN RIAU

**Kantor Cabang dan Kantor Cabang Pembantu**
Branch Offices and Sub-Branch Offices

| | | |
|---|---|---|
| **KC Batam - Nagoya Hill**<br>Komp. Ruko Nagoya Hill Blok P No. 12 A & B, Kel. Lubuk Baja, Kec. Lubuk Baja, Kota Batam, Kepulauan Riau 29432<br>T: +62 778 7493 708<br>F: +62 778 7493 527 | **KC Tanjung Pinang - Engku Putri**<br>Jl. Engku Putri No. 41 RT. 001 RW. 012, Kel. Tanjung Ayun Sakti, Kec. Bukit Bestari, Kota Tanjung Pinang, Kepulauan Riau 29122<br>T: +62 771 314 888<br>F: +62 771 22733 | **KCP Hang Jebat - Bintan**<br>Jl. Hang Jebat RT. 008 RW. 005, Kel. Kijang Kota, Kec. Bintan Timur, Kab. Bintan, Kepulauan Riau 29151<br>T: +62 771 61072<br>F: +62 771 61074 |
| **KCP Batam Center - Batam**<br>Komp. Ruko Raflesia Business Centre Blok F No. 1 Batam Centre – Batam, Kel. Sungai Panas, Kec. Batam Kota, Kota Batam, Kepulauan Riau 29432<br>T: +62 778 468 841<br>F: +62 778 7493 527 | **KCP DI Panjaitan - Tanjung Pinang**<br>Jl. DI Panjaitan No. 3 RT. 003 RW. 002, Kel. Batu Sembilan, Kec. Tanjung Pinang Timur, Kota Tanjung Pinang, Kepulauan Riau 29125<br>T: +62 771 7335 235<br>F: +62 771 7335 237 | |

## JAMBI

**Kantor Cabang dan Kantor Cabang Pembantu**
Branch Offices and Sub-Branch Offices

| | | |
|---|---|---|
| **KC Jambi - Hayam Wuruk**<br>Jl. Hayam Wuruk No. 146-147 RT. 009 RW. 000, Kel. Talang Jauh, Kec. Jelutung, Kota Jambi, Jambi 36133<br>T: +62 741 7554 988<br>F: +62 741 7554 889 | **KCP Tungkal Ulu - Tanjung Jabung Barat**<br>Jl. Besar Perkantoran PT. LPPPI Desa/Kel. Tebing Tinggi, Kec. Tebing Tinggi, Kab. Tanjung Jabung Barat, Jambi 36556<br>T: +62 742 552 100<br>F: +62 742 552 112 | **KCP M.Yamin - Muara Bungo**<br>Jl. M Yamin No. 32, Kel. Bungo Barat, Kec. Pasar Muara Bungo, Kab. Bungo, Jambi 37215<br>T: +62 747 321 788<br>F: +62 747 321 399 |
| **KCP Selincah - Jambi**<br>Jl. Sentot Alibasa RT. 015 RW. 005, Kel. Payo Selincah, Kec. Jambi Timur, Kota Jambi, Jambi 36148<br>T: +62 741 5918 486<br>F: +62 741 5918 386 | **KCP Pattimura - Jambi**<br>Jl. Pattimura No. 43, Kel. Rawasari, Kec. Alam Barajo, Kota Jambi, Jambi 36126<br>T: +62 741 65017<br>F: +62 741 669671 | **KCP Lintas Sumatera - Sarolangun**<br>Jl. Lintas Sumatera KM 1 No. 05-06 RT. 001, Kel. Aur Gading, Kec. Sarolangun, Kab. Sarolangun, Jambi 37481<br>T: +62 745 91322<br>F: +62 745 91321 |
| **KCP Simpang Rimbo - Jambi**<br>Jl. Pattimura RT. 042 RW. 000 Simpang Rimbo, Kel. Kenali Besar, Kec. Alam Barajo, Kota Jambi, Jambi 36129<br>T : +62 741 5910 908<br>F : - | | |

## SUMATERA SELATAN
### SOUTH SUMATERA

**Kantor Cabang**
Branch Offices

| |
|---|
| **Palembang - Basuki Rahmat**<br>Jl. Basuki Rahmat No. 776, Kel. Ario Kemuning, Kec. Kemuning, Kota Palembang, Sumatera Selatan 30128<br>T: +62 711 371 334<br>F: +62 711 410 306 |

**Kantor Cabang Pembantu**
Sub-Branch Offices

| | | |
|---|---|---|
| **Sudirman - Palembang**<br>Jl. Sudirman KM 35 RT. 013 RW. 005 No. 2937 I/J Kel. Dua Puluh Ilir dIII, Kec. Iti Palembang, Kota Palembang, Sumatera Selatan 30129<br>T: +62 711 316 534<br>F: +62 711 320 893 | **Marga Rahayu - Lubuk Linggau**<br>Jl. Sultan Mahmud Badaruddin II No. 12, Kel. Marga Rahayu, Kec. Lubuk Lingau Selatan II, Kota Lubuk Linggau, Sumatera Selatan 31627<br>T: +62 733 452 515<br>F: +62 733 452 122 | **Letkol Iskandar - Palembang**<br>Kompleks Ilir Barat Permai Blok D1 No. 21 Jl. Letkol Iskandar Palembang, Kel. 24 ilir, Kec. Bukit Kecil, Kota Palembang, Sumatera Selatan 30134<br>T: +62 711 316 336<br>F: +62 711 316 380 |
| **Sudirman - Prabumulih**<br>Jl. Jend. Sudirman No. 70-71 RT. 003 RW. 010, Kel. Muara Dua, Kec. Prabumulih Timur, Kota Prabumulih, Sumatera Selatan 31114<br>T: +62 713 320 410<br>F: +62 713 320 401 | **Mayor Ruslan - Lahat**<br>Jl. Mayor Ruslan III No. 092 RT. 001 RW. 004, Kel. Pasar Lama, Kec. Lahat, Kab. Lahat, Sumatera Selatan 31413<br>T: +62 731 321 827<br>F: +62 731 321 921 | **A.Yani - Baturaja OKU**<br>Jl. Jend. A Yani RT. 034 RW. 010, Kel. Baturaja Lama, Kec. Baturaja Timur, Kab. Ogan Komering Ulu, Sumatera Selatan 32111<br>T: +62 735 323 736 / 731<br>F: +62 735 322 941 |
| **PT. OPP Mills - OKI**<br>PT. Oki Pulp & Paper Mills Desa/Kel. Bukit Batu, Kec. Air Sugihan, Kab. Ogan Komering Ilir, Sumatera Selatan 30656<br>T : 08881581502<br>F : - | **Yos Sudarso - Lubuk Linggau**<br>Jl. Yos Sudarso No. 66A, Kel. Jawa Kiri I, Kec. Lubuk Linggau Timur, Kota Lubuk Linggau, Sumatera Selatan 31623<br>T: +62 733 323 323<br>F: +62 733 322 404 | **KM 11 - Palembang**<br>Jl. Raya Palembang-Betung 1261 RT. 016 RW. 006, Kel. Alang-Alang Lebar, Kec. Alang-Alang Lebar, Kota Palembang, Sumatera Selatan 30154<br>T: +62 711 431 569<br>F: +62 711 431 532 |
| **Pasar Ilir 15 - Palembang**<br>Jl. Segaran 545, Kel. 15 ilir, Kec. Ilir Timur I, Kota Palembang, Sumatera Selatan 30124<br>T: +62 711 356 732<br>F: +62 711 356 612 | **Plaju - Palembang**<br>Jl. Jend. A Yani RT. 019 RW. 007, Kel. Tangga Takat, Kec. Seberang Ulu II, Kota Palembang, Sumatera Selatan 30264<br>T: +62 711 512 960<br>F: +62 711 512 972 | |

## BENGKULU

**Kantor Cabang**
Branch Offices

| |
|---|
| **Bengkulu - Jati**<br>Jl. Jati No. 16 RT. 005 RW. 002, Kel. Sawah Lebar, Kec. Ratu Agung, Kota Bengkulu, Bengkulu 38228<br>T: +62 736 346 828<br>F: +62 736 341 686 |

**Kantor Cabang Pembantu**
Sub-Branch Offices

| | | |
|---|---|---|
| **Manna - Bengkulu Selatan**<br>Jl. A Yani No. 37, Kel. Ibul, Kec. Kota Manna, Kab. Bengkulu Selatan, Bengkulu 38513<br>T: +62 739 2360 280<br>F: - | **Panorama - Bengkulu**<br>Jl. Salak Raya Timur No. 97 RT. 008 RW. 003, Kel. Panorama, Kec. Singaranpati Lingkar Timur, Kota Bengkulu, Bengkulu 38226<br>T: +62 736 5408 583<br>F: +62 736 23785 | **Pagar Dewa - Bengkulu**<br>Jl. Adam Malik RT. 003 RW. 001, Kel. Pagar Dewa, Kec. Selebar Bengkulu, Kota Bengkulu, Bengkulu 38211<br>T: +62 736 52494<br>F: +62 736 52803 |
| **Kepahiang - Bengkulu**<br>Jl. Santoso, Kel. Dusung Kepahiang, Kec. Kepahiang Bengkulu, Kab. Kepahiang, Bengkulu 39372<br>T : -<br>F : - | **Ketahun - Bengkulu**<br>Jl. Giri Kencana RT. 002 RW. 004, Kel. Giri Kencana, Kec. Ketahun, Kab. Bengkulu Utara, Bengkulu 38361<br>T : -<br>F : - | |

## LAMPUNG

**Kantor Cabang dan Kantor Cabang Pembantu**
Branch Offices and Sub-Branch Offices

| | | |
|---|---|---|
| **KC Bandar Lampung - Ikan Hiu**<br>Jl. Ikan Hiu No. 3, Kel. Pesawahan, Kec. Teluk Betung Selatan, Kota Bandar Lampung, Lampung 35223<br>T: +62 721 475 300<br>F: +62 721 472 688 | **KCP Sudirman - Metro**<br>Jl. Jend. Sudirman No. 872, Kel. Imopuro, Kec. Metro Pusat, Kota Metro, Lampung 34111<br>T : +62 725 7852 881<br>F : - | **KCP Lintas Timur - Tulang Bawang**<br>Jl. Lintas Timur Dwiwarga Tunggal Jaya Desa Dwiwarga Tunggal Jaya, Kel. Desa Dwiwarga Tunggal Jaya, Kec. Banjar Agung, Kab.<br>T : +62 726 7758 253<br>F : - |
| **KCP Kalianda - Lampung Selatan**<br>Jl. Kusuma Bangsa RT. 001 RW. 001, Kel. Kalianda, Kec. Kalianda, Kab. Lampung Selatan, Lampung 35511<br>T: +62 727 321 888<br>F: +62 727 323 002 | **KCP Tanjung Karang - Bandar Lampung**<br>Jl. Jend. Ahmad Yani No. 17 D, Kel. Pelita, Kec. Tanjung Karang Pusat, Kota Bandar Lampung, Lampung 35111<br>T: +62 721 250 439<br>F: +62 721 258 972 | **KF UMK Bandar Jaya - Lampung**<br>Jl. Proklamator Raya RT. 004 RW. 002 Kel. Bandar Jaya Kec. Terbanggibesar Kab. Lampung Tengah Lampung 34163<br>T : -<br>F : - |

## BANGKA BELITUNG

**Kantor Cabang dan Kantor Cabang Pembantu**
Branch Offices and Sub-Branch Offices

| | | |
|---|---|---|
| **KC Pangkal Pinang - Soekarno Hatta**<br>Jl. Soekarno Hatta No. 17 (Jl. Raya Koba Km 5), Kel. Dul, Kec. Pangkalan Baru, Kab. Bangka Tengah, Bangka Belitung 33171<br>T: +62 717 4256 885<br>F: +62 717 4256 878 | **KC Belitung - Sudirman**<br>Jl. Jendral Sudirman No. 21, Kel. Pangkal Lalang, Kec. Tanjung Pandan, Kab. Belitung, Bangka Belitung 33412<br>T : +62 719 22898<br>F : - | **KCP Sungai Liat - Bangka**<br>Ruko Town Square No. C3 Jl. Muhidin, Kel. Sungai liat Bangka, Kec. Sungai liat, Kab. Bangka, Bangka Belitung 33211<br>T : +62 717 95159<br>F : +62 717 95915 |
| **KCP A.Yani - Pangkal Pinang**<br>Jl. Achmad Yani No. 69 RT. 001 RW. 002, Kel. Batin Tikal Pangkal Pinang, Kec. Taman Sari, Kota Pangkal Pinang, Bangka Belitung 33121<br>T: +62 717 424 558<br>F: +62 717 434 391 | | |



## DKI JAKARTA

**Kantor Cabang**
Branch Offices

| | | |
|---|---|---|
| **Jakarta - Thamrin**<br>Sinar Mas Land Plaza - Menara 1 Jl. MH Thamrin No. 51 RT. 008 RW. 004, Kel. Gondangdia, Kec. Menteng, Jakarta Pusat DKI Jakarta 10350<br>T: +62 21 3199 0101<br>F: +62 21 3199 0405 | **Jakarta - Tanah Abang**<br>Jl. Fachrudin No. 18-20, Kel. Kampung Bali, Kec. Tanah Abang, Jakarta Pusat, DKI Jakarta 10250<br>T: +62 21 3983 5522<br>F: +62 21 3983 5530 | **Jakarta - Mangga Dua**<br>Wisma Eka Jiwa Lt. Dasar No. 1 & 2 Jl. Mangga Dua Raya, Kel. Mangga Dua Selatan, Kec. Sawah Besar, Jakarta Pusat, DKI Jakarta 10730<br>T: +62 21 6230 1505<br>F: +62 21 6230 1510 |
| **Jakarta - Kelapa Gading**<br>Rukan Kelapa Gading Permai Blok LA1 No. 30-31 Jl. Raya Boulevard Barat, Kel. Kelapa Gading Utara, Kec. Kelapa Gading, Jakarta Utara, DKI Jakarta 14240<br>T: +62 21 4515 678<br>F: +62 21 4515 951 | **Jakarta - L'Avenue Pasar Minggu**<br>L'Avenue-South Residence Office Towers Jl. Raya Pasar Minggu Kav 16 Gatot Subroto, Kel. Pancoran, Kec. Pancoran, Jakarta Selatan, DKI Jakarta 12780<br>T : +62 21 8066 7070<br>F : - | **Jakarta - Puri Kembangan**<br>Jl. Puri Kencana Blok M8-3T, Kel. Kembangan Selatan, Kec. Kembangan, Jakarta Barat, DKI Jakarta 11610<br>T: +62 21 5830 1605<br>F: +62 21 5830 1625 |
| **Jakarta - PIK Cordoba**<br>Jl. Marina Raya Ruko Cordoba Blok B No. 5, Kel. Kamal Muara, Kec. Penjaringan, Jakarta Utara, DKI Jakarta 14470<br>T: +62 21 2257 1051<br>F: +62 21 2257 1195 | **Jakarta - Pondok Indah Plaza 2**<br>Pondok Indah Plaza 2 Blok BA Persil No. 11 Jl. Metro Pondok Indah RT. 003 RW. 014, Kel. Pondok Pinang, Kec. Kebayoran Lama, Jakarta Selatan, DKI Jakarta 12310<br>T: +62 21 2782 8338<br>F: +62 21 2782 8337 | |

**Kantor Cabang Pembantu**
Sub-Branch Offices

| | | |
|---|---|---|
| **MSIG - Jakarta**<br>Sinarmas MSIG Tower - Ground Floor Jl. Jenderal Sudirman Kav 21, Kel. Karet, Kec. Setiabudi, Jakarta Selatan, DKI Jakarta 10350<br>T : +62 21 5206 894<br>F : 088212569604 | **Cikini - Jakarta**<br>Gedung Graha Multi Modern Jl. Cikini Raya No. 44, Kel. Cikini, Kec. Menteng, Jakarta Pusat, DKI Jakarta 10310<br>T : +62 21 3193 1061<br>F : - | **Slipi - Jakarta**<br>Gedung The Capitol lantai 2 Jl. S Parman Kav 73, Kel. Slipi, Kec. Palmerah, Jakarta Barat, DKI Jakarta 11410<br>T: +62 21 5347 226<br>F: +62 21 5347 229 |
| **Kwitang - Jakarta**<br>Gedung Capitol Sixteen (dahulu Gedung Kwitang Office) Gedung Capitol ICDX Jl. Prajurit KKO Usman dan Harun No. 16 RT. 002 RW. 001, Kel. Kwitang, Kec. Senen, Jakarta Pusat, DKI Jakarta 10420<br>T: +62 21 2234 6688<br>F: +62 21 2234 6070 | **Senayan City - Jakarta**<br>Senayan City Mall Lt.6 unit 6-11 Jl. Asia Afrika Lot 19 RT. 001 RW. 003, Kel. Gelora, Kec. Tanah Abang, Jakarta Pusat, DKI Jakarta 10270<br>T : +62 21 7278 1554 / +62 21 7278 1587<br>F : - | **Central Park - Jakarta**<br>Central Park Mall Lt. LG Jl. LetJend S. Parman Kav 28, Kel. Tomang, Kec. Grogol Petamburan, Jakarta Barat, DKI Jakarta 11470<br>T: +62 21 5698 5210<br>F: +62 21 5698 5212 |
| **Tanjung Duren - Jakarta**<br>Jl. Tanjung Duren No. 25 A RT. 001 / RW. 007, Kel. Tanjung Duren Utara, Kec. Grogol Petamburan, Jakarta Barat, DKI Jakarta 11250<br>T: +62 21 5694 1491<br>F: +62 21 5694 1492 | **Intercon - Jakarta**<br>Kompleks Pertokoan Taman Kebon Jeruk (Intercon Plaza) Blok D No. 7, Kel. Srengseng, Kec. Kembangan, Jakarta Barat, DKI Jakarta 11630<br>T : +62 21 5890 9421<br>F : - | **Harmoni - Jakarta**<br>Jl. Suryopranoto, Komplek Harmoni Plaza Blok B No. 14-15, Kel. Petojo Utara, Kec. Gambir, Jakarta Pusat, DKI Jakarta 10130<br>T: +62 21 2206 6343<br>F: +62 21 2206 9382 |

## Kantor Cabang Pembantu
Sub-Branch Offices

| | | |
|---|---|---|
| **ITC Roxy Mas - Jakarta**<br>Jl. KH Hasyim Ashari Pusat Pertokoan ITC Roxy Mas Blok B1 No. 3 RW. 008, Kel. Cideng, Kec. Gambir, Jakarta Barat, DKI Jakarta 10150<br>T: +62 21 6329 904<br>F: +62 21 6329 902 | **Pluit - Jakarta**<br>Jl. Pluit Kencana Raya No. 79 E, Kel. Pluit, Kec. Penjaringan, Jakarta Utara, DKI Jakarta 14450<br>T : +62 21 2608 1234<br>F : - | **Mangga Besar - Jakarta**<br>Jl. Mangga Besar VIII No. 8, Kel. Taman Sari, Kec. Taman Sari, Jakarta Barat, DKI Jakarta 11150<br>T: +62 21 6251 989<br>F: +62 21 6252 002 |
| **Batu Tulis - Jakarta**<br>Jl. Batu Tulis Raya No. 7, Kel. Kebon Kelapa, Kec. Gambir Kota, Jakarta Pusat, DKI Jakarta 10120<br>T: +62 21 3802 038<br>F: +62 21 3802 093 | **Sunter - Jakarta**<br>Jl. Danau Sunter Utara Blok 74, Kel. Sunter Agung, Kec. Tanjung Priok, Jakarta Utara, DKI Jakarta 14350<br>T : +62 21 6583 2083<br>F : +62 21 6583 2084 | **Kelapa Gading 2 - Jakarta**<br>Jl. Boulevard Raya Blok PA 11 No. 3-4 RT. 003 RW. 014, Kel. Kelapa Gading, Kec. Pegangsaan Dua, Jakarta Utara, DKI Jakarta 14250<br>T: +62 21 4584 7393/7490<br>F: +62 21 4504 128 |
| **Season City - Jakarta**<br>Ruko Season City Blok D No. 3 Jl. Jembatan Besi 33 RT. 001 RW. 005, Kel. Jembatan Besi, Kec. Tambora Latumenten, Jakarta Barat, DKI Jakarta 11320<br>T: +62 21 2937 5041<br>F: +62 21 2937 5042 | **ITC Cempaka Mas - Jakarta**<br>Ruko Cempaka Mas Blok E No. 5 & 6 Jl. Let-Djen Suprapto, Kel. Sumur Batu, Kec. Kemayoran Cempaka Putih, Jakarta Pusat, DKI Jakarta 10640<br>T : +62 21 4290 6634<br>F : +62 21 4290 6635 | **Samanhudi - Jakarta**<br>Jl. Samanhudi No. 63, Kel. Pasar Baru, Kec. Sawah Besar, Jakarta Pusat, DKI Jakarta 10710<br>T: +62 21 3801 312<br>F: +62 21 3801 321 |
| **Bintaro - Jakarta**<br>Jl. Raya Bintaro Utama I Blok E No. 12 Sektor 1 RT. 013 RW. 008, Kel. Bintaro, Kec. Pesanggrahan, Jakarta Selatan, DKI Jakarta 12330<br>T: +62 21 7375 226<br>F: +62 21 7372 410 | **Permata Hijau - Jakarta**<br>Jl. Permata Hijau Blok CC 6 No. 1, Kel. Grogol Utara, Kec. Kebayoran Lama, Jakarta Selatan, DKI Jakarta 12210<br>T : +62 21 5366 3646<br>F : +62 21 5366 3647 | **Fatmawati 1 - Jakarta**<br>Komp. Ruko Duta Mas Blk A2 No. 2 Jl. Raya Fatmawati, Kel. Cipete, Kec. Kebayoran Baru, Jakarta Selatan, DKI Jakarta 12150<br>T : +62 21 7278 8022<br>F : - |
| **Sabang - Jakarta**<br>Jl. KH Agus Salim No. 45, Kel. Kebon Sirih, Kec. Menteng, Jakarta Pusat, DKI Jakarta 10340<br>T: +62 21 3925 472<br>F: +62 21 3925 391 | **Ambasador - Jakarta**<br>ITC Kuningan Ambasador Blok 9-C Lt. 5 Jl. Prof. Dr. Satrio Mall Ambasador Lt. 5 Blok 9 C RT. 011 RW. 004 Casablanca, Kel. Kuningan, Kec. Karet Kuningan, Jakarta Selatan, DKI Jakarta 12940<br>T : +62 21 5793 3779<br>F : +62 21 5793 3784 | **Roxy Square - Jakarta**<br>Roxy Square Jl. Kyai Tapa No. 1 RT. 010 RW. 010 Unit D3 Lower Ground, Kel. Tomang, Kec. Grogol Petamburan, Jakarta Barat, DKI Jakarta 11440<br>T : +62 21 5695 4567<br>F : +62 21 5695 4545 |
| **Menara Tekno - Jakarta**<br>Gedung Menara Tekno Lt. GF, Jl. KH Fachrudin No. 19 RT. 1 RW. 7, Kel. Kampung Bali, Kec. Tanah Abang, Jakarta Pusat, DKI Jakarta 10250<br>T : 087788757644<br>F : - | **Hasyim Ashari - Jakarta**<br>Jl. KH Hasyim Ashari No. 34 RT. 003 RW. 001, Kel. Duri Pulo, Kec. Gambir, Jakarta Pusat, DKI Jakarta 10150<br>T : +62 21 6385 7348/123<br>F : - | **Capitol Salemba - Jakarta**<br>The Capitol Appartment Tower T Lantai Dasar Lobby Emerald Jl. Salemba Raya No. 16, Kel. Kenari, Kec. Senen, Jakarta Pusat, DKI Jakarta 40115<br>T : 082123064146<br>F : - |
| **SOF Summitmas - Jakarta**<br>Gedung Summitmas II Lt. 9 Jl. Jend. Sudirman Kav 61-62, Kel. Senayan, Kec. Kebayoran Baru, Jakarta Selatan, DKI Jakarta 12190<br>T : +62 21 2521 902/903<br>F : +62 21 2521 905 | **ITC Mangga Dua - Jakarta**<br>ITC Mangga Dua 2A Lt. 1 Blok D No. 60 A 61 & 60 B Jl. Raya Mangga Dua, Kel. Ancol, Kec. Pademangan, Jakarta Utara, DKI Jakarta 14430<br>T : +62 21 6230 0902<br>F : +62 21 6230 0907 | **Pluit Riverside - Jakarta**<br>Muara Indah Menara I B Lt. 1 No. 10 B Jl. Pluit Karang Barat No. 50, Kel. Penjaringan, Kec. Penjaringan, Jakarta Utara, DKI Jakarta 14450<br>T : +62 21 6660 7701<br>F : +62 21 6660 7703 |
| **Kali Besar - Jakarta**<br>Jl. Kali Besar No. 8, Kel. ROA Malaka, Kec. Tambora, Jakarta Barat, DKI Jakarta 11230<br>T : +62 21 6907 910<br>F : +62 21 6907 918 | **Rawamangun - Jakarta**<br>Jl. Paus No. 83 A RT. 001 RW. 008 Rawamangun, Kel. Jati, Kec. Pulo Gadung, Jakarta Timur, DKI Jakarta 13220<br>T : +62 21 4786 9552<br>F : +62 21 4586 9540 | **PIK Tzu Chi - Jakarta**<br>Yayasan Budha Tzu Chi Jl. Raya Boulevard Pantai Indah Kapuk, Kel. Kamal Muara, Kec. Penjaringan, Jakarta Utara, DKI Jakarta 11440<br>T : +62 21 2931 6398<br>F : +62 21 2931 6399 |

## Kantor Fungsional Operasional (KFO) Funding
Funding Operational Functional Offices

| | |
|---|---|
| **OTO Kedoya - Jakarta**<br>Ruko Graha Arteri Mas 5A Jl. Panjang No. 68, Kel. Kedoya Selatan, Kec. Kebon Jeruk, Jakarta Barat, DKI Jakarta 11520<br>T: +62 21 5830 1070<br>F: +62 21 5835 6843 | **OTO Kalimalang - Jakarta**<br>Jl. Raya Kali (Tarum Barat) No. 1 C-D, Kel. Pondok Kelapa, Kec. Duren Sawit, Jakarta Timur, DKI Jakarta 13450<br>T: +62 21 8690 7141<br>F: +62 21 8690 7140 |

## JAWA BARAT
### WEST JAVA

**Kantor Cabang**
Branch Offices

| | | |
|---|---|---|
| **Bogor - Padjajaran**<br>Jl. Pajajaran No. 38 A RT. 005 RW. 004, Kel. Babakan, Kec. Kota Bogor Tengah, Kota Bogor, Jawa Barat 16128<br>T: +62 251 8326 577<br>F: +62 251 8357 495 | **Cirebon - Wahidin Sudirohusodo**<br>Jl. Dr Wahidin Sudirohusodo No. 29, Kel. Sukapura, Kec. Kejaksan, Kota Cirebon, Jawa Barat 45122<br>T: +62 231 246 388<br>F: +62 231 244 198 | **Tasikmalaya - Sutisna Sanjaya**<br>Jl. Sutisna Sanjaya No. 65 RT. 004 RW. 008, Kel. Lengkongsari, Kec. Tawang, Kota Tasikmalaya, Jawa Barat 46113<br>T: +62 265 311 929<br>F: +62 265 313 522 |
| **Garut - Ciledug**<br>Jl. Ciledug No. 180 RT. 001 RW. 015, Kel. Kota Kulon, Kec. Garut Kota, Kab. Garut, Jawa Barat 44112<br>T: +62 262 2246 520<br>F: +62 262 2246 521 | **Karawang - Kertabumi**<br>Jl. Kertabumi No. 18 A Karawang, Kel. Karawang Kulon, Kec. Karawang Barat, Kab. Karawang, Jawa Barat 41311<br>T: +62 267 8454 508<br>F: +62 267 8454 489 | **Sukabumi - RA Kosasih**<br>Jl. RA Kosasih No. 118 RT. 002 RW. 002, Kel. Subang Jaya, Kec. Cikole Sukabumi, Kota Sukabumi, Jawa Barat 43116<br>T: +62 266 246 788<br>F: +62 266 246 784 |
| **Bandung - Abdul Rivai**<br>Jl. Abdul Rivai No. 2 RT. 005 RW. 017, Kel. Taman Sari, Kec. Bandung Wetan, Kota Bandung, Jawa Barat 40116<br>T: +62 22 4241 800<br>F: +62 22 4206 466/ 4212 538 | | |

**Kantor Cabang Pembantu**
Sub-Branch Offices

| | | |
|---|---|---|
| **Ahmad Yani - Bekasi**<br>Jl. Ahmad Yani Komplek Ruko Bekasi Mas Blok C No. 4-5, Kel. Marga Jaya, Kec. Bekasi Selatan, Kota Bekasi, Jawa Barat 17143<br>T: +62 21 8896 2588<br>F: +62 21 8885 5308 | **Kota Wisata Cibubur - Jakarta**<br>Perumahan Kota Wisata Cibubur Area Ruko Sentra Eropa Blok SEA No. 3, Kel. Ciangsana, Kec. Gunung Putri, Kab. Bogor, Jawa Barat 16968<br>T: +62 21 8493 3877<br>F: +62 21 8493 3190 | **Grand Wisata - Bekasi**<br>Perumahan Grand Wisata Celebration Boulevard Blok AA-15/No. 23, Kel. Lambang Sari, Kec. Tambun Selatan, Kab. Bekasi, Jawa Barat 17150<br>T: +62 21 8261 6201<br>F: +62 21 8261 5909 |
| **Margonda - Depok**<br>Jl. Margonda Raya No. 56 Ruko ITC Depok No. 1, Kel. Pancoran Mas, Kec. Pancoran Mas, Kota Depok, Jawa Barat 16431<br>T: +62 21 7721 5160<br>F: +62 21 7721 5161 | **Sudirman - Bogor**<br>Jl. Jendral Sudirman No. 15H Ruko Pabaton, Kel. Pabaton, Kec. Bogor Tengah, Kota Bogor, Jawa Barat 16121<br>T: +62 251 8332 878<br>F: +62 251 8387 811 | **Tajur - Bogor**<br>Jl. Raya Wangun Tajur No. 307 C (Jl. Tajur No. 18) RT. 003 RW. 004, Kel. Sindangsari, Kec. Bogor Timur, Kota Bogor, Jawa Barat 16146<br>T: +62 251 8249 111<br>F: +62 251 8249 350 |
| **Pasar Anyar - Bogor**<br>Jl. Dewi Sartika Blok A No. 64 RT. 001 RW. 002, Kel. Pabaton, Kec. Bogor Tengah, Kota Bogor, Jawa Barat 16121<br>T: +62 251 8330 699<br>F: +62 251 8330 755 | **MTC - Bandung**<br>Komp. MTC Kav B-11 Jl. Soekarno Hatta No. 590 Ruko Metro Indah Mall B11 RT. 004 RW. 011, Kel. Sekejati, Kec. Buah Batu, Kota Bandung, Jawa Barat 40286<br>T: +62 22 7535 530<br>F: +62 22 7535 680 | **Sudirman - Bandung**<br>Ruko Kapitol Jl. Jend. Sudirman No. 91, Kel. Karang Anyar, Kec. Astana Anyar, Kota Bandung, Jawa Barat 40241<br>T: +62 22 4205 002<br>F: +62 22 4260 106 |
| **Jatinangor - Sumedang**<br>Jl. Raya Bandung - Garut KM 215, Kel. Mekargalih, Kec. Jatinangor, Kab. Sumedang, Jawa Barat 45363<br>T: +62 22 7782 757<br>F: +62 22 7782 725 | **Grand Center - Cirebon**<br>Ruko Grand Center No. D6 RT. 005 RW. 002 Jl. Pangeran Suryanegara, Kel. Pekalangan, Kec. Pekalipan, Kota Cirebon, Jawa Barat 45118<br>T: +62 231 237 723<br>F: +62 231 237 722 | **Mayor Abdurachman - Sumedang**<br>Jl. Mayor Abdurachman No. 199 RT. 002 RW. 010, Kel. Kotakaler, Kec. Sumedang Utara, Kab. Sumedang, Jawa Barat 45322<br>T: +62 261 202 606<br>F: +62 261 203 839 |
| **A.H.Nasution - Bandung**<br>Jl. AH Nasution No. 192, Kel. Cipadung Kulon, Kec. Panyileukan, Kota Bandung, Jawa Barat 40614<br>T: +62 22 8788 0101<br>F: +62 22 8788 0102 | **Cikampek - Karawang**<br>Ruko Central Cikampek No. 5 Jl. Ahmad Yani Dawuan, Kel. Dawuan Timur, Kec. Cikampek, Kab. Karawang, Jawa Barat 41373<br>T: +62 264 8386 448<br>F: +62 264 8386 445 | **Buah Batu - Bandung**<br>Jl. Buah Batu No. 248, Kel. Cijagra, Kec. lengkong, Kota Bandung, Jawa Barat 40265<br>T : +62 22 7322 348<br>F : - |
| **Pataruman - Banjar**<br>Jl. Letjen Soewarto No. 97, Kel. Hegarsari, Kec. Pataruman, Kota Banjar, Jawa Barat 46322<br>T: +62 265 2732 500<br>F: +62 265 2732 501 | **Lembang - Bandung**<br>Jl. Raya Lembang No. 317-319, Kel. Jayagiri, Kec. Lembang Bandung, Kab. Bandung Barat, Jawa Barat 40391<br>T: +62 22 2786 790<br>F: +62 22 2787 135 | **Otista - Subang**<br>Jl. Otista No. 252 RT. 095 RW. 026, Kel. Karanganyar, Kec. Subang, Kab. Subang, Jawa Barat 41211<br>T: +62 260 414 699<br>F: +62 260 414 698 |

## Kantor Cabang Pembantu
Sub-Branch Offices

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| **Amir Mahmud - Cimahi**<br>Jl. Amir Mahmud No. 491 RT. 004 RW. 005, Kel. Karang Mekar, Kec. Cimahi Tengah, Kota Cimahi, Jawa Barat 40523<br>T: +62 22 6646 998<br>F: +62 22 6647 098 | **Veteran - Purwakarta**<br>Jl. Veteran No. 98, Kel. Negri Kaler, Kec. Purwakarta, Kab. Purwakarta, Jawa Barat 41115<br>T: +62 264 8225 888<br>F: +62 264 8225 824 | **Kopo - Bandung**<br>Komplek Taman Kopo Indah II Blok 1 A No. 69, Kel. Rahayu, Kec. Margaasih Bandung, Kota Bandung, Jawa Barat 40218<br>T: +62 22 5419 151<br>F: +62 22 5419 150 |
| **Muwardi - Cianjur**<br>Jl. Dr Muwardi No. 173 RT. 002 RW. 003 Buniwangi, Kel. Bojongherang, Kec. Cianjur, Kab. Cianjur, Jawa Barat 43216<br>T: +62 263 2292 878<br>F: +62 263 2292 877 | **A.Yani - Sukabumi**<br>Jl. Ahmad Yani No. 235 Ruko No. 3 RT. 002 RW. 004, Kel. Kebonjati, Kec. Cikole, Kota Sukabumi, Jawa Barat 43112<br>T: +62 266 229 366<br>F: +62 266 229 377 | **Sudirman - Ciamis**<br>Jl. Jendral Sudirman No. 163 RT. 004 RW. 002, Kel. Ciamis, Kec. Ciamis, Kab. Ciamis, Jawa Barat 46211<br>T: +62 265 776 410<br>F: +62 265 776 420 |
| **Siliwangi - Kuningan**<br>Jl. Siliwangi No. 273 B RT. 002 RW. 004 Lingkungan Dago, Kel. Cijoho, Kec. Kuningan, Kab. Kuningan, Jawa Barat 45513<br>T: +62 232 872 458<br>F: +62 232 872 456 | **Abdul Halim - Majalengka**<br>Jl. KH Abdul Halim No. 149 Cirebon, Kel. Majalengka Kulon, Kec. Majalengka, Kab. Majalengka, Jawa Barat 45418<br>T: +62 233 8890 033<br>F: +62 233 8890 036 | **KIIC - Karawang**<br>Graha KIIC 1st Floor Jl. Permata Raya Slot CB-1 Kawasan Industri KIIC Karawang, Kel. Sukaluyu, Kec. Telukjambe Timur, Kab. Karawang, Jawa Barat 41361<br>T : +62 267 8458 058<br>F : - |
| **Sudirman - Indramayu**<br>Jl. Sudirman No. 93 RT. 001 RW. 007, Kel. Lemah Mekar, Kec. Indramayu, Kab. Indramayu, Jawa Barat 45212<br>T: +62 234 274 416<br>F: +62 234 274 424 | **Jamika - Bandung**<br>Jl. Jamika No. 42 A RT. 003 RW. 007, Kel. Jamika, Kec. Bojongloa Kaler, Kota Bandung, Jawa Barat 40231<br>T: +62 22 6009 100<br>F: +62 22 6009 172 | **Delta Mas - Bekasi**<br>Ruko Spanish Square Blok A No. 2 Kota Deltamas, Kel. Hegarmukti, Kec. Cikarang Pusat, Kab. Bekasi, Jawa Barat 17530<br>T: +62 21 8997 0578<br>F: +62 21 8997 0581 |
| **ITSB Delta Mas - Cikarang**<br>Kampus ITSB Jl. Ganesha Boulevard Lot A1 CBD (Tol Jakarta Cikampek KM 7), Kel. Pasiranji, Kec. Cikarang Pusat, Kab. Bekasi, Jawa Barat 17531<br>T: +62 21 5055 5365<br>F: +62 21 8897 0581 | **Jababeka Cikarang - Bekasi**<br>Jl. Niaga Raya Ruko Metro Boulevard Kav A11 Kawasan Industri JABABEKA Cikarang, Kel. Pasir Sari, Kec. Cikarang, Kab. Bekasi, Jawa Barat 17835<br>T: +62 21 8984 2361<br>F: +62 21 8984 2360 | **Ciomas - Bogor**<br>Jl. Raya Ciomas No. 33 RT. 001 RW. 003, Kel. Pagelaran, Kec. Ciomas, Kab. Bogor, Jawa Barat 16610<br>T : +62 251 7588 289<br>F : - |
| **Cibanteng - Bogor**<br>Jl. Raya Cibanteng Proyek No. 175 RT. 002 RW. 004, Kel. Cihideung ilir, Kec. Ciampea, Kab. Bogor, Jawa Barat 16620<br>T: +62 251 8629 079<br>F: +62 251 8629 772 | **Cibinong - Bogor**<br>Jl. Mayor Oking No. 134, Kel. Cirimekar, Kec. Cibinong, Kab. Bogor, Jawa Barat 16917<br>T: +62 21 8791 8788<br>F: +62 21 8790 8740 | **Cisarua - Bogor**<br>Jl. Raya Puncak KM 81 No. 1C, Kel. Cisarua, Kec. Cisarua, Kab. Bogor, Jawa Barat 16750<br>T: +62 251 8251 734<br>F: +62 251 8251 720 |
| **Leuwiliang - Bogor**<br>Komp. Saptamarga (Pasar Baru Leuwiliang) Jl. Raya Leuwiliang RT. 001 RW. 003, Kel. Leuwiliang, Kec. Leuwiliang, Kab. Bogor, Jawa Barat 16640<br>T: +62 251 8640 907<br>F: - | **Cileungsi - Bogor**<br>Jl. Raya Narogong (Pasar Cileungsi) Kel. Cileungsi Kidul Kec. Cileungsi Kab. Bogor Jawa Barat 16820<br>T: +62 21 8248 4278<br>F: - | **Kebon Pedes - Bogor**<br>Jl. Raya Kebon Pedes No. 44, Kel. Kebon Pedes, Kec. Tanah Sareal, Kota Bogor, Jawa Barat 16162<br>T: +62 251 8577 168<br>F: +62 251 8576 894 |

## Kantor Fungsional Operasional (KFO) Funding
Funding Operational Functional Offices

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| **SOF Pondok Gede - Bekasi**<br>Plaza Pondok Gede Ruko Blok F No. 20-22, Kel. Jatiwaringin, Kec. Pondok Gede, Kota Bekasi, Jawa Barat 17411<br>T : 081210328648<br>F : - | **OTO Point Automotive Cibubur - Depok**<br>Ruko Cibubur Point Automotive Center Blok A No. 12 B Jl. Raya Alternatif Cibubur (Trans Yogi) Desa/Kel. Harjamukti, Kec. Cimanggis, Kota Depok, Jawa Barat 16454<br>T: +62 21 8430 0369<br>F: +62 21 8430 0370 | **Pindodeli - Karawang**<br>Desa Kuta Mekar BTB 6/9 Karawang, Kel. Kutamekar, Kec. Ciampel, Kab. Karawang, Jawa Barat 41361<br>T: +62 267 8610 150<br>F: +62 267 8610 145 |
| **Padalarang - Bandung Barat**<br>Kp. Cigeunjing RT. 013 RW. 004, Desa/Kel. Kertajaya, Kec. Padalarang, Kab. Bandung Barat, Jawa Barat 40553<br>T : +62 22 8681 5198 / 5197<br>F : +62 22 6804 101 | **Soreang - Bandung**<br>Jl. Soreang Banjaran No. 402 Kp. Ciburial Timur RT. 006 RW. 006, Kel. Soreang, Kec. Soreang, Kab. Bandung, Jawa Barat 40911<br>T: +62 22 5891 481<br>F: +62 22 5891 873 | **Ciparay - Bandung**<br>Jl. Raya Laswi No. 592 RT. 001 RW. 001, Kel. Gunung Leutik, Kec. Ciparay, Kab. Bandung, Jawa Barat 40381<br>T: +62 22 5952 181<br>F: +62 22 5952 182 |
| **Cikajang - Garut**<br>Jl. Raya Cikajang No. 10, Kel. Cibodas, Kec. Cikajang, Kab. Garut, Jawa Barat 44171<br>T : +62 262 576309<br>F : +62 262 576348 | **Cipeujeuh - Cirebon**<br>Jl. MT Haryono No. 38 Dusun 2 RT. 005 RW. 002, Kel. Cipeujeuh Wetan, Kec. Lemahabang, Kab. Cirebon, Jawa Barat 45183<br>T: +62 231 8638 891<br>F: +62 231 8638 895 | **Wanaraja - Garut**<br>Jl. Raya Wanaraja No. 50, Kel. Cimalaka, Kec. Wanaraja Karangpawitan, Kab. Garut, Jawa Barat 44183<br>T: +62 262 2449 470<br>F: +62 262 2449 461 |

**Kantor Fungsional Operasional (KFO) Funding**
Funding Operational Functional Offices

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| **Arjawinangun - Cirebon**<br>Jl. Sultan Syahrir No. 2 (dh Jalan Pahlawan) RT. 001 RW. 009 Dusun V Desa/Kel. Jungjang, Kec. Arjawinangun, Kab. Cirebon, Jawa Barat 45162<br>T : +62 231 357716<br>F : +62 231 359070 | **AH Nasution - Bandung**<br>Ruko Bandung Timur Kav. A11, Jl. AH Nasution No. 46 A, Kel. Pakemitan, Kec. Cinambo, Kota Bandung, Jawa Barat 40612<br>T : +62 22 6376 4445<br>F : - | **OTO Lengkong Kecil - Bandung**<br>Jl. Lengkong Kecil No. 50, Kel. Paledang, Kec. Lengkong, Kota Bandung, Jawa Barat 40261<br>T: +62 22 4212 580<br>F: +62 22 4210 189 |
| **SOF Moch.Ramdan - Bandung**<br>Jl. Moch. Ramdan No. 72, Kel. Ciateul, Kec. Regol, Kota Bandung, Jawa Barat 40252<br>T : 08888779854<br>F : - | **SOF Batununggal - Bandung**<br>Jl. Batununggal Indah Raya No. 164 – 166, Kel. Batununggal, Kec. Bandung Kidul, Kota Bandung, Jawa Barat 40273<br>T : 08888779856<br>F : - | **Limbangan - Garut**<br>Jl. Raya Limbangan No. 22, Kel. Blubur Limbangan, Kec. Limbangan Garut, Kab. Garut, Jawa Barat 44186<br>T: +62 262 431420<br>F: +62 262 431418 |
| **Kadungora - Garut**<br>Jl. Raya Kadungora Kp. Cigunung Agung RT. 001 RW. 006, Kel. Kadungora, Kec. Kadungora, Kab. Garut, Jawa Barat 44153<br>T : +62 262 455681<br>F : +62 262 455682 | **Rancaekek - Bandung**<br>Jl. Raya Rancaekek No. 141 RT. 003 RW. 012 Kampung Babakan Desa Majasetra (ext. Jl. Babakan 141 Majalaya), Kel. Majakerta, Kec. Majalaya, Kab. Bandung, Jawa Barat 40382<br>T : +62 22 5952 927<br>F : - | **Banjaran - Bandung**<br>Jl. Raya Banjaran No. 66 RT. 002 RW. 003, Kel. Banjaran Wetan, Kec. Banjaran, Kab. Bandung, Jawa Barat 40377<br>T : +62 22 5943 801<br>F : - |
| **Sumber - Cirebon**<br>Jl. Pangeran Cakrabuana Blok Mentrik No. 3A RT. 001 RW. 005, Kel. Kemantren, Kec. Sumber, Kab. Cirebon, Jawa Barat 45611<br>T : +62 231 8308 877<br>F : +62 231 8308 876 | | |

**Kantor Fungsional Operasional (KFO) Lending**
Lending Operational Functional Offices

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| **Singaparna - Tasikmalaya**<br>Jl. Raya Timur No. 17 RT. 002 RW. 014 Cikiray, Kel. Singaparna, Kec. Singaparna, Kab. Tasikmalaya, Jawa Barat 46411<br>T: +62 265 545300<br>F: +62 265 545277 | **Cisaat - Sukabumi**<br>Jl. Raya Rambai No. 45B, Kel. Sukamantri, Kec. Cisaat, Kab. Sukabumi, Jawa Barat 43152<br>T: +62 266 237855<br>F: +62 266 216058 |

**Kantor Fungsional – UMK**
Functional Offices for SMEs

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| **Ibrahim Singadilaga - Purwakarta**<br>Jl. Ibrahim Singadilaga No. 86 B RT. 016 RW. 010, Kel. Nagri Kaler, Kec. Purwakarta, Kab. Purwakarta, Jawa Barat 41115<br>T : +62 264 8225825<br>F : +62 264 8225824 | **Cibadak - Sukabumi**<br>Jl. Siliwangi No. 129 RT. 001 RW. 028, Kel. Cibadak, Kec. Cibadak, Kab. Sukabumi, Jawa Barat 43351<br>T : +62 266 6531500<br>F : |

## JAWA TENGAH
### CENTRAL JAVA

**Kantor Cabang**
Branch Offices

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|---|---|---|
| **Semarang - Gang Tengah**<br>Jl. Gang Tengah No. 9, Kel. Kranggan, Kec. Semarang Tengah, Kota Semarang, Jawa Tengah 50137<br>T: +62 24 3562 625<br>F: +62 24 3562 623 | **Purwokerto - Wiratmaja**<br>Jl. RA Wiratmaja No. 28 RT. 003 RW. 004, Kel. Kedungwuluh, Kec. Purwokerto Barat, Kab. Banyumas, Jawa Tengah 53131<br>T: +62 281 6572 888<br>F: +62 281 6578 066 | **Magelang - Ahmad Yani**<br>Jl. Ahmad Yani No. 77 RT. 002 RW. 006, Kel. Kramat Selatan, Kec. Magelang Utara, Kota Magelang, Jawa Tengah 56115<br>T: +62 293 3219 595<br>F: +62 293 3219 596 |
| **Kudus - Sudirman**<br>Jl. Jendral Sudirman Ruko Sudirman No. 6, Kel. Barongan, Kec. Kota Kudus, Kab. Kudus, Jawa Tengah 59312<br>T: +62 291 4245 818<br>F: +62 291 4245 852 | **Tegal - Sudirman**<br>Jl. Jendral Sudirman No. 32, Kel. Pekauman, Kec. Tegal Barat, Kota Tegal, Jawa Tengah 52113<br>T: +62 283 325 323<br>F: +62 283 325 511 | **Pekalongan - Dr. Cipto**<br>Jl. Dr. Cipto No. 39, Kel. Keputran, Kec. Pekalongan Timur, Kota Pekalongan, Jawa Tengah 51128<br>T: +62 285 436 110<br>F: +62 285 437 310 |
| **Solo - Urip Sumoharjo**<br>Jl. Urip Sumoharjo No. 163 RT. 009 RW. 001, Kel. Kepatihan Wetan, Kec. Jebres Surakarta, Kota Solo, Jawa Tengah 57126<br>T: +62 271 641 093<br>F: +62 271 641 793 | | |

## Kantor Cabang Pembantu
Sub-Branch Offices

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| **Sultan Agung - Semarang**<br>Ruko Sultan Agung Kav 9 Jl. Sultan Agung No. 104-106 RT. 001 RW. 001, Kel. Wonotingal, Kec. Candisari, Kota Semarang, Jawa Tengah 50252<br>T: +62 24 8509 034<br>F: +62 24 8509 035 | **Pemuda - Semarang**<br>Rukan Pemuda Mas Blok A Kav A/8 Jl. Pemuda No. 150, Kel. Sekayu, Kec. Semarang Tengah, Kota Semarang, Jawa Tengah 50132<br>T: +62 24 3564 888<br>F: +62 24 3564 889 | **Gatot Subroto - Cilacap**<br>Jl. Jend. Gatot Subroto No. 42-44 RT. 001 RW. 10, Kel. Sidanegara, Kec. Cilacap Tengah, Kab. Cilacap, Jawa Tengah 53223<br>T: +62 282 5253 434<br>F: +62 282 5253 131 |
| **Diponegoro - Salatiga**<br>Jl. Diponegoro No. 77 RT. 001 RW. 002, Kel. Dusun Sidorejo Lor, Kec. Sidorejo, Kota Salatiga, Jawa Tengah 50714<br>T: +62 298 315 603<br>F: +62 298 328 856 | **A.Yani - Pemalang**<br>Jl. Ahmad Yani Utara No. 6 RT. 004 RW. 008, Kel. Kebondalem, Kec. Pemalang, Kab. Pemalang, Jawa Tengah 52312<br>T: +62 284 323 285<br>F: +62 284 322 154 | **Adiwerna - Tegal**<br>Jl. Adiwerna No. 16 RT. 012 RW. 006, Kel. Adiwerna, Kec. Adiwerna Tegal, Kab. Tegal, Jawa Tengah 52194<br>T: +62 283 446 001<br>F: +62 283 446 122 |
| **A.Yani - Purbalingga**<br>Ruko PJKA No. 1 Jl. A Yani RT. 001 RW. 001, Kel. Kandang Gampang, Kec. Purbalingga, Kab. Purbalingga, Jawa Tengah 53312<br>T: +62 281 896 565<br>F: +62 281 896 061 | **Muntilan - Magelang**<br>Jl. Pemuda No. 95 RT. 002 RW. 002, Kel. Pucungrejo, Kec. Muntilan, Kab. Magelang, Jawa Tengah 56414<br>T: +62 293 587 870<br>F: +62 293 585 499 | **Majapahit - Semarang**<br>Komp. Mall Majamas Jl. Brigjend Sudiarto No. 198 H (jl. Majapahit) RT. 002 RW. 001, Kel. Gayamsari, Kec. Gayamsari, Kota Semarang, Jawa Tengah 50161<br>T: +62 24 6731 200<br>F: +62 24 6731 235 |
| **Solo Baru - Sukoharjo**<br>Komp. Super Makmur 2 Jl. Raya Solo Baru No. 10 F-G, Desa/Kel. Madegondo, Kec. Grogol Sukoharjo, Kab. Sukoharjo, Jawa Tengah 57552<br>T: +62 271 6727 273<br>F: +62 271 6727 263 | **Rajawali - Klaten**<br>Jl. Rajawali No. 113 RT. 008 RW. 001 Tegal Blateran, Kel. Kabupaten, Kec. Klaten Tengah, Kab. Klaten, Jawa Tengah 57413<br>T: +62 272 3351 528<br>F: +62 272 3351 527 | **Tentara Pelajar - Temanggung**<br>Jl. Tentara Pelajar No. 6 (14) RT. 001 RW. 007, Kel. Temanggung 1, Kec. Temanggung, Kab. Temanggung, Jawa Tengah 56212<br>T: +62 293 493 200<br>F: +62 293 493 232 |
| **Banyumanik - Semarang**<br>Jl. Kamfer Raya No. 11 A, Kel. Padangsari, Kec. Banyumanik Semarang, Kota Semarang, Jawa Tengah 50267<br>T: +62 24 7648 1977<br>F: +62 24 7648 1987 | **Sukowati - Sragen**<br>Jl. Raya Sukowati No. 60 RT. 003 RW. 012 Dukuh Beloran, Kel. Sragen Kulon, Kec. Sragen, Kab. Sragen, Jawa Tengah 57212<br>T: +62 271 8823 401<br>F: +62 271 8823 403 | **Sudirman - Semarang**<br>Ruko Siliwangi Square Atrium Kav 9 Jl. Jend. Sudirman No. 322 RT. 001 RW. 001, Kel. Salman Mloyo, Kec. Semarang Barat, Kota Semarang, Jawa Tengah 50143<br>T: +62 24 7667 1266<br>F: +62 24 7667 1252 |
| **Mayjend Sutoyo - Kebumen**<br>Jl. Mayjend Sutoyo No. 41 RT. 006 RW. 006, Kel. Kebumen, Kec. Kebumen, Kab. Kebumen, Jawa Tengah 54311<br>T: +62 287 385 813<br>F: +62 287 385 814 | **Metro Square - Magelang**<br>Jl. Mayjend Bambang Sugeng Ruko Metro Square blok F-1, Kel. Mertoyudan, Kec. Mertoyudan, Kab. Magelang, Jawa Tengah 56172<br>T: +62 293 326199 / 326496<br>F: +62 293 325322 | **Bumiayu - Brebes**<br>Jl. Raya Utara No. 77 RT. 001 RW. 004, Kel. Dukuhturi, Kec. Bumiayu, Kab. Brebes, Jawa Tengah 52273<br>T: +62 289 430 699<br>F: +62 289 430 224 |
| **Tentara Pelajar - Magelang**<br>Komplek Ruko Top Square Blok A6 Jl. Tentara Pelajar No. 3-5, Kel. Kemirirejo, Kec. Magelang Tengah, Kota Magelang, Jawa Tengah 56123<br>T: +62 293 310380<br>F: +62 293 310381 | | |

## Kantor Fungsional Operasional (KFO) Funding
Funding Operational Functional Offices

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| **Ungaran - Semarang**<br>Ungaran Square Ruko No. 10 Jl. Diponegoro No. 745 RT. 002 RW. 003, Kel. Ungaran, Kec. Ungaran Barat, Kab. Semarang, Jawa Tengah 50511<br>T: +62 24 6925 860<br>F: +62 24 6925 861 | **Kedungwuni - Pekalongan**<br>Jl. Raya Kedungwuni No. 2 RT. 002 RW. 013, Kel. Kedungwuni Barat, Kec. Kedungwuni Pekalongan, Kab. Pekalongan, Jawa Tengah 51000<br>T: +62 285 785888<br>F: +62 285 785400 | **Ajibarang - Banyumas**<br>Jl. Raya Ajibarang Tegal No. 8 RT. 003 RW. 008, Desa/ Kel. Ajibarang Kulon, Kec. Ajibarang, Kab. Banyumas, Jawa Tengah 53163<br>T: +62 281 571666<br>F: +62 281 571991 |
| **Kartasura - Sukoharjo**<br>Kompleks Ruko Kartasura Blok F Jl. Jend. Ahmad Yani No. 41 RT. 001 RW. 003 Solo, Kel. Kartasura, Kec. Kartasura, Kab. Sukoharjo, Jawa Tengah 57168<br>T : +62 271 783200<br>F : +62 271 784377 | **Jend. Sudirman - Wonogiri**<br>Jl. Jend. Sudirman No. 226 Bauresan, Kel. Giritirto, Kec. Wonogiri, Kab. Wonogiri, Jawa Tengah 57611<br>T: +62 273 323535<br>F: +62 273 324084 | |

**Kantor Fungsional Operasional (KFO) Lending**
Lending Operational Functional Offices

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| **A.Yani - Brebes**<br>Jl. A Yani No. 25 RT. 003 RW. 021, Kel. Brebes, Kec. Brebes, Kab. Brebes, Jawa Tengah 52212<br>T: +62 283 672395<br>F: +62 283 671222 | **Weleri - Kendal**<br>Jl. Utama Timur No. 37A RT. 004 RW. 005 Desa/ Kel. Weleri, Kec. Weleri, Kab. Kendal, Jawa Tengah 51355<br>T: +62 294 3641042<br>F: +62 294 3641043 |

**Kantor Fungsional – UMK**
Functional Offices for SMEs

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| **Purwodadi - Grobogan**<br>Jl. Ahmad Yani No. 15 RT. 004 RW. 004 Relokasi Jl. Ruko Cahaya Griya Mandiri Blok D Penganten, Kel. Nglejok Putat, Kec. Purwodadi, Kab. Grobogan, Jawa Tengah 58112<br>T : -<br>F : - | **Setiabudi - Pati**<br>Jl. Setiabudi 5D Pati Relokasi Ruko Tentrem Jl. Setiabudi No. 21E, Kel. Pati Kidul, Kec. Pati, Kab. Pati, Jawa Tengah 59115<br>T : -<br>F : - | **Mayong - Jepara**<br>Ruko Abadi Mayong Jl. Jepara-Kudus KM 22, Kel. Mayonglor, Kec. Mayong, Kab. Jepara, Jawa Tengah 59465<br>T : -<br>F : - |



## DAERAH ISTIMEWA YOGYAKARTA
### SPECIAL REGION FOR YOGYAKARTA

**Kantor Cabang**
Branch Offices

**Yogyakarta - Balapan Kemakmuran**
Jl. Balapan Kemakmuran No. 11, Kel. Klitren, Kec. Gondokusuman, Kota Yogyakarta, DI Yogyakarta 55222
T: +62 274 561372
F: +62 274 561383

**Kantor Cabang Pembantu**
Sub-Branch Offices

**Katamso - Yogyakarta**
Ruko Gondomanan Square Jl. Bridjen Katamso No. 37, Kel. Prawirodirjen, Kec. Gondomanan, Kota Yogyakarta, DI Yogyakarta 55121
T: +62 274 410497
F: +62 274 410498

**Kantor Fungsional Operasional (KFO) Funding**
Funding Operational Functional Offices

| | | |
|---|---|---|
| **Kaliurang - Sleman**<br>Jl. Kaliurang KM 8,1 Prujakan RT. 004 RW. 033, Kel. Sinduharjo, Kec. Ngaglik, Kab. Sleman, DI Yogyakarta 55581<br>T: +62 274 8722600<br>F: +62 274 885219 | **Ringroad - Yogyakarta**<br>Jl. Ringroad Utara RT. 28 RW. 16 Mancasan, Kel. Condong Catur, Kec. Depok, Kab. Sleman, DI Yogyakarta 55283<br>T: +62 274 8722345<br>F: +62 274 8722350 | **Kalasan - Sleman**<br>Jl. Raya Yogya Solo Km 105 Dukuh Sorogenen 1, Kel. Purwomartani, Kec. Kalasan, Kab. Sleman, DI Yogyakarta 55571<br>T: +62 274 498251<br>F: +62 274 497636 |

## JAWA TIMUR
### EAST JAVA

**Kantor Cabang**
Branch Offices

| | | |
|---|---|---|
| **Malang - Basuki Rahmat**<br>Jl. Basuki Rahmat No. 58 RT. 008 RW. 009, Kel. Kauman, Kec. Klojen, Kota Malang, Jawa Timur 65119<br>T: +62 341 360036<br>F: +62 341 360015 | **Jember - Sudirman**<br>Jl. PB Sudirman No. 14, Kel. Jember Lor, Kec. Patrang, Kab. Jember, Jawa Timur 68117<br>T: +62 331 481040<br>F: +62 331 481419 | **Kediri - Erlangga**<br>Jl. Erlangga No. 32-34 RT. 002 RW. 010, Kel. Ngadirejo, Kec. Kota, Kota Kediri, Jawa Timur 64132<br>T: +62 354 683388<br>F: +62 354 683399 |
| **Madiun - Sumatera**<br>Jl. Sumatera No. 25 RT. 031 RW. 008, Kel. Madiun Lor, Kec. Manguharjo, Kota Madiun, Jawa Timur 63127<br>T: +62 351 493493<br>F: +62 351 493492 | **Mojokerto - Pahlawan**<br>Ruko Royal Regency R1 Jl. Pahlawan No. 7 Ruko Royal Regency R1, Kel. Balongsari, Kec. Magersari, Kota Mojokerto, Jawa Timur 61322<br>T: +62 321 390757<br>F: +62 321 390805 | **Gresik - RA Kartini**<br>Jl. RA Kartini No. 236 Kav 7, Kel. Sidomoro, Kec. Kebomas, Kab. Gresik, Jawa Timur 61122<br>T: +62 31 3991920<br>F: +62 31 3991921 |

## Kantor Cabang
Branch Offices

| | | |
|---|---|---|
| **Bojonegoro - Untung Suropati**<br>Jl. Untung Suropati No. 53 RT. 007 RW. 003, Kel. Sumbang, Kec. Bojonegoro, Kab. Bojonegoro, Jawa Timur 62155<br>T: +62 353 885848<br>F: +62 353 885750 | **Banyuwangi - Basuki Rahmat**<br>Jl. Basuki Rahmad No. 61 RT. 001 RW. 003, Kel. Singotrunan, Kec. Banyuwangi, Kab. Banyuwangi, Jawa Timur 68413<br>T: +62 333 418777<br>F: +62 333 418799 | **Surabaya - Diponegoro**<br>Jl. Diponegoro No. 64 RT. 006 RW. 014, Kel. Dr Soetomo, Kec. Tegalsari, Kota Surabaya, Jawa Timur 60264<br>T: +62 31 5671717<br>F: +62 31 5671616 |

## Kantor Cabang Pembantu
Sub-Branch Offices

| | | |
|---|---|---|
| **ITC Mega Grosir - Surabaya**<br>ITC Mega Grosir Ground Floor BT No. 1 C Jl. Gembong No. 20-30 LT G BT O1 C RT. 003 RW. 010, Kel. Kapasan, Kec. Simokerto, Kota Surabaya, Jawa Timur 60141<br>T: +62 31 3743188<br>F: +62 31 3743133 | **J. A. Suprapto - Malang**<br>Ruko Blok B3 Jl. Jaksa Agung Suprapto No. 40 RT. 009 RW. 001, Kel. Rampal Claket, Kec. Klojen, Kota Malang, Jawa Timur 65111<br>T: +62 341 336060<br>F: +62 341 336015 | **Kembang Jepun - Surabaya**<br>Jl. Kembang Jepun No. 86 RT. 003 RW. 005, Kel. Nyamplungan, Kec. Pabean Cantian, Kota Surabaya, Jawa Timur 60161<br>T: +62 31 3523838<br>F: +62 31 3545595 |
| **Ir.Soekarno (MERR) - Surabaya**<br>Ruko Promenade Kav 15 Jl. Dr. Ir. H. Soekarno No. 15, Kel. Kedung Baruk, Kec. Rungkut, Kota Surabaya, Jawa Timur 60298<br>T: +62 31 87851717<br>F: +62 31 87856788 | **Mayjen Sungkono - Surabaya**<br>Jl. Mayjen Sungkono No. 131 RT. 002 RW. 002, Kel. Dukuh Pakis, Kec. Dukuh Pakis, Kota Surabaya, Jawa Timur 60225<br>T: +62 31 5616151<br>F: +62 31 5616160 | **Kepanjen - Malang**<br>Jl. Panglima Sudirman RT. 002 RW. 002, Desa/Kel. Ngadilangkung, Kec. Kepanjen, Kab. Malang, Jawa Timur 65163<br>T: +62 341 398800<br>F: +62 341 398448 |
| **Ngurah Rai - Tulungagung**<br>Jl. I Gusti Ngurah Rai No. 63, Kel. Jepun, Kec. Tulungagung, Kab. Tulungagung, Jawa Timur 66218<br>T: +62 355 323999<br>F: +62 355 337323 | **Ahmad Yani - Sidoarjo**<br>Jl. Ahmad Yani No. 24 RT. 023 RW. 004, Kel. Sidokumpul, Kec. Sidoarjo, Kab. Sidoarjo, Jawa Timur 61212<br>T: +62 31 8074777<br>F: +62 31 8074778 | **Gatot Subroto - Jombang**<br>Jl. Gatot Subroto No. 126 RT. 001 RW. 001, Kel. Mojongapit, Kec. Jombang, Kab. Jombang, Jawa Timur 61413<br>T: +62 321 868031<br>F: +62 321 868033 |
| **Sendang Harjo - Tuban**<br>Jl. Basuki Rahmat No. 42 RT. 001 RW. 005, Kel. Sendangharjo, Kec. Tuban, Kab. Tuban, Jawa Timur 62319<br>T: +62 356 326777<br>F: +62 356 329425 | **Tjiwi Kimia - Sidoarjo**<br>Gedung Tjiwi Kimia Jl. Raya Surabaya-Mojokerto KM 44, Desa/Kel. Kramat Temenggung, Kec. Tarik, Kab. Sidoarjo, Jawa Timur 61265<br>T: +62 321 360377<br>F: +62 321 360380 | **Promenade Taman Asri - Sidoarjo**<br>Komplek Pertokoan Promenade Taman Asri Kav TA 02-03 Jl. Raya Taman Asri Pondok Tjandra Indah RT. 25 RW. 08, Kel. Tambak Sumur, Kec. Waru, Kab. Sidoarjo, Jawa Timur 61256<br>T: +62 31 99691717<br>F: +62 31 99681616 |

## Kantor Fungsional Operasional (KFO) Funding
Funding Operational Functional Offices

| | | |
|---|---|---|
| **Mpu Nala - Mojokerto**<br>Jl. Mpu Nala No. 85 RT. 003 RW. 003, Kel. Balongsari, Kec. Magersari, Kota Mojokerto, Jawa Timur 61316<br>T: +62 321 332101 / 332095<br>F: +62 321 320111 | **Krian - Sidoarjo**<br>Jl. Imam Bonjol No. 2A RT. 033 RW. 008 Desa Ngingas, Kel. Krian, Kec. Krian, Kab. Sidoarjo, Jawa Timur 61262<br>T: +62 31 8984459<br>F: +62 31 8984460 | **Rungkut - Surabaya**<br>Jl. Jemur Andayani No. 11 RT. 002 RW. 008, Kel. Jemurwonosari, Kec. Wonocolo, Kota Surabaya, Jawa Timur 60237<br>T: +62 31 8484782<br>F: +62 31 8484780 |
| **Singosari - Malang**<br>Jl. Panglima Sudirman Kav 148 H RT. 003 RW. 009, Kel. Pagentan, Kec. Singosari, Kab. Malang, Jawa Timur 65153<br>T : +62 341 454914<br>F : +62 341 454915 | **Mojosari - Mojokerto**<br>Ruko Royal Regency Blok RA 01 Jl. Airlangga RT. 003 RW. 002 Pekukuhan, Kel. Seduri, Kec. Mojosari, Kab. Mojokerto, Jawa Timur 61382<br>T: +62 321 590381<br>F: +62 321 590402 | **Tamansari - Bondowoso**<br>Jl. Kis Mangunsarkoro No. 431, Kel. Tamansari, Kec. Bondowoso, Kab. Bondowoso, Jawa Timur 68216<br>T: +62 332 5551987<br>F: +62 341 826797 |
| **Dewi Sartika - Batu**<br>Jl. Dewi Sartika No. 28 B RT. 005 RW. 009, Kel. Temas, Kec. Batu Kota, Kota Batu, Jawa Timur 65315<br>T : +62 341 591198<br>F : +62 341 591177 | **Alun-Alun Timur - Ponorogo**<br>Jl. Alon-Alon Timur No. 4 RT. 002 RW. 003 Lingkungan Krajan, Kel. Mangkujayan, Kec. Ponorogo, Kab. Ponorogo, Jawa Timur 63413<br>T: +62 352 487388<br>F: +62 352 487288 | **Gajah Mada - Banyuwangi**<br>Jl. Gajah Mada Kav 14 RT. 008 RW. 003, Kel. Genteng Kulon, Kec. Genteng, Kab. Banyuwangi, Jawa Timur 68465<br>T: +62 333 846784<br>F: +62 333 848783 |
| **Ahmad Yani - Jember**<br>Jl. Ahmad Yani No. 85, Kel. Kepatihan, Kec. Kaliwates, Kab. Jember, Jawa Timur 68137<br>T : +62 331 481399<br>F : - | | |

**Kantor Fungsional – UMK**
Functional Offices for SMEs

**Airlangga - Mojokerto**
Ruko Royal Regency Blok RA 01 Jl. Airlangga RT. 003 RW. 002, Kel. Pekukuhan, Kec. Mojosari, Kab. Mojokerto, Jawa Timur 61382
T : +62 321 590397
F : +62 321 590402

## BANTEN

**Kantor Cabang**
Branch Offices

**Tangerang - BSD GOP 6**
Green Office Park 6-BSD City Wing A-Ground Floor Jl. Grand Boulevard BSD Green Office Park BSD City, Kel. Sampora, Kec. Cisauk, Kab. Tangerang, Banten 15345
T: +62 21 2958 0233
F: +62 21 2958 0235

**Kantor Cabang Pembantu**
Sub-Branch Offices

| | | |
|---|---|---|
| **Indah Kiat Serpong - TangSel**<br>Wisma Indah Kiat A Building 1st Floor Jl. Raya Serpong KM 8, Kel. Pakulonan, Kec. Tangerang, Kota Tangerang Selatan, Banten 15325<br>T: +62 21 53120271<br>F: +62 21 53120277 | **Alam Sutera - TangSel**<br>Komp. Perumahan Alam Sutera Jl. Jalur Sutera Kav 29 D No. 25, Kel. Pakualam, Kec. Serpong, Kota Tangerang Selatan, Banten 15320<br>T: +62 21 53141101<br>F: +62 21 53141079 | **Otista - Tangerang**<br>Ruko Otista Jl. Otista No. 05 B RT. 001 RW. 002, Kel. Gerendeng, Kec. Karawaci, Kota Tangerang, Banten 15113<br>T: +62 21 55768290<br>F: +62 21 55768521 |
| **Kapt. Soebijanto BSD - TangSel**<br>Wisma BCA Wing A/ Ground Floor Jl. Kapten Soebijanto Djojohadikusumo BSD City Tangerang, Kel. Lengkong Gudang, Kec. Serpong, Kota Tangerang Selatan, Banten 15322<br>T: +62 21 53167170<br>F: +62 21 53167192 | **Gading Serpong - Tangerang**<br>Jl. Gading Serpong Boulevard Ruko Alexandrite Blok ALX 3 No. 23 Gading Serpong Tangerang, Kel. Curug Serengseng, Kec. Kelapa Dua, Kab. Tangerang, Banten 15810<br>T: +62 21 22228886<br>F: +62 21 22227677 | **BSD Golden Boulevard - TangSel**<br>Ruko Golden Boulevard Jl. Pahlawan Seribu Blok G1 No. 06-07 BSD City, Kel. Lengkong Karya, Kec. Serpong Utara, Kota Tangerang Selatan, Banten 15310<br>T: +62 21 53161305<br>F: +62 21 53161304 |
| **Indah Kiat - Serang**<br>Gedung PT. Indah Kiat Pulp & Paper Jl. Raya Serang KM 76, Kel. Kragilan, Kec. Kragilan, Kab. Serang, Banten 42184<br>T: +62 254 280979<br>F: +62 254 280292 | **Mahkota Mas - Cilegon**<br>Komplek Cilegon Green Mega blok B1 No. 5 Jl. Raya Ahmad Yani, Desa/Kel. Cibeber, Kec. Cilegon, Kota Cilegon, Banten 42426<br>T: +62 254 393953<br>F: +62 254 393923 | |

**Kantor Fungsional Operasional (KFO) Funding**
Funding Operational Functional Offices

| | | |
|---|---|---|
| **SOF Grand Arkade Cikupa - Tangerang**<br>Ruko Grand Arkade Blok VB No. 10 & 12, Desa/Kel. Mekar Bakti, Kec. Panongan, Kab. Tangerang, Banten 15710<br>T : +62 21 22028246<br>F : - | **SOF Balaraja - Tangerang**<br>Jl. Raya Serang KM 24 No. 3-4 RT. 002 RW. 002, Kel. Balaraja, Kec. Sentul Jaya, Kab. Tangerang, Banten 15610<br>T: +62 21 5953585/ 5954556<br>F: +62 21 5954587 | **SOF TangCity - Tangerang**<br>Ruko Tangerang City Bussines Park Blok B 19-21 Jl. Jend. Sudirman No. 1 RT. 001 RW. 005, Kel. Cikokol, Kec. Tangerang, Kota Tangerang, Banten 15118<br>T : +62 21 29239111<br>F : - |
| **SOF Taktakan - Serang**<br>Komp. Ruko Titan Arum Blok H2 Jl. Serang KM 3 No. 4C, Kel. Drangong, Kec. Taktakan, Kota Serang, Banten 42162<br>T : +62 254 8242783 / 8242676 / 200064<br>F : - | **OTO Cikokol - Tangerang**<br>Jl. Mohammad Husni Thamrin Cikokol Kompleks Mahkota Mas Blok J No. 39 RT. 003 RW. 010, Kel. Cikokol, Kec. Tangerang, Kota Tangerang, Banten 15117<br>T : -<br>F : - | |

## BALI

**Kantor Cabang**
Branch Offices

**Denpasar - Mpu Tantular**
Jl. Mpu Tantular No. 8, Kel. Dangin Puri Kelod, Kec. Denpasar Timur, Kota Denpasar, Bali 80234
T: +62 361 230055
F: +62 361 230022

**Kantor Cabang Pembantu**
Sub-Branch Offices

| | | |
|---|---|---|
| **Gatot Subroto - Denpasar**<br>Jl. Gatot Subroto Tengah No. 100 C-D, Kel. Tonja, Kec. Denpasar Timur, Kota Denpasar, Bali 80238<br>T: +62 361 264393<br>F: +62 361 264378 | **Ahmad Yani - Tabanan**<br>Jl. Ahmad Yani No. 2, Kel. Banjar Anyar, Kec. Kediri, Kab. Tabanan, Bali 82123<br>T: +62 361 9315778<br>F: +62 361 815390 | **Ubud - Gianyar**<br>Jl. Raya Andong Br Petulu, Kel. Petulu, Kec. Ubud, Kab. Gianyar, Bali 80571<br>T: +62 361 4792727<br>F: +62 361 4792728 |
| **Ngurah Rai - Singaraja**<br>Jl. Ngurah Rai No. 8 Kota Singaraja, Kel. Kendran, Kec. Buleleng, Kab. Buleleng, Bali 81112<br>T: +62 362 22799<br>F: +62 362 22850 | **Ngurah Rai - Badung**<br>Jl. By Pass Ngurah Rai No. 188, Kel. Benoa, Kec. Kuta Selatan, Kab. Badung, Bali 80363<br>T: +62 361 8498195<br>F: +62 361 8498196 | **Dharma Giri - Gianyar**<br>Jl. Dharma Giri No. 4C, Kel. Gianyar, Kec. Gianyar, Kab. Gianyar, Bali 80511<br>T: +62 361 8958311<br>F: +62 361 8958312 |

## NUSA TENGGARA BARAT
## WEST NUSA TENGGARA

**Kantor Cabang**
Branch Offices

**Mataram - Pejanggik**
Jl. Pejanggik No. 24, Kel. Mataram Barat, Kec. Selaparan, Kota Mataram, NTB 83126
T: +62 370 644999
F: +62 370 640135

**Kantor Cabang Pembantu**
Sub-Branch Offices

| | | |
|---|---|---|
| **Pejanggik - Mataram**<br>Jl. Pejanggik, Kel. Cakranegara Barat, Kec. Cakranegara, Kota Mataram, NTB 83239<br>T: +62 370 633222<br>F: +62 370 629863 | **Zainuddin - Lombok Timur**<br>Jl. TGKH M Zainuddin Abdul Madjid, Kel. Pancor, Kec. Selong, Kab. Lombok Timur, NTB 83611<br>T: +62 376 21999<br>F: +62 376 22066 | **Gajah Mada - Bima**<br>Jl. Gajah Mada No. 6 Karara, Kel. Monggonao, Kec. Mpunda, Kota Bima, NTB 84111<br>T: +62 374 44111<br>F: +62 374 43018 |

**Kantor Fungsional Operasional (KFO) Lending**
Lending Operational Functional Offices

**Praya - Lombok Tengah**
Jl. Jend. Sudirman No. 55-57, Kel. Praya, Kec. Praya, Kab. Lombok Tengah, NTB 83511
T : 08888779975
F : -

## NUSA TENGGARA TIMUR
## EAST NUSA TENGGARA

**Kantor Cabang**
Branch Offices

**Kupang - Flores**
Jl. Flores No. 8, Kel. Fatubesi, Kec. Kota Lama, Kota Kupang, NTT 85226
T: +62 380 829799
F: +62 380 828611

**Kantor Cabang Pembantu**
Sub-Branch Offices

**Kelimutu - Ende**
Jl. Kelimutu No. 58, Kel. Kelimutu, Kec. Ende Tengah, Kab. Ende, NTT 86319
T: +62 381 2627433
F: +62 381 2627435

**Sudirman - Maumere**
Jl. Jenderal Sudirman RT. 013 RW. 004, Kel. Waioti, Kec. Alok Timur, Kab. Sikka, NTT 86118
T: +62 382 2425425
F: +62 382 2425424

**Kantor Fungsional Operasional (KFO) Funding**
Funding Operational Functional Offices

**Timor Raya - Kupang**
Jl. Timor Raya KM 9, Kel. Oesapa, Kec. Kelapa Lima, Kota Kupang, NTT 85228
T : +62 380 8552053
F : +62 380 8552052



## KALIMANTAN BARAT
### WEST KALIMANTAN

**Kantor Cabang**
Branch Offices

**Pontianak - Gajah Mada**
Jl. Gajah Mada No. 1 A-B RT. 001 RW. 024, Kel. Benua Melayu Darat, Kec. Pontianak Selatan, Kota Pontianak, Kalimantan Barat 78122
T: +62 561 766100
F: +62 561 767074

**Kantor Cabang Pembantu**
Sub-Branch Offices

**Suprapto - Ketapang**
Jl. Letjen R Suprapto No. 30, Kel. Tengah, Kec. Delta Pawan Ketapang, Kab. Ketapang, Kalimantan Barat 78812
T: +62 534 3037100
F: +62 534 3037130

**Adi Sucipto - Pontianak**
Jl. Adi Sucipto No. 10, Kel. Bangka Belitung Darat, Kec. Pontianak Tenggara, Kota Pontianak, Kalimantan Barat 78124
T: +62 561 581617
F: +62 561 581025

**MT Haryono - Sintang**
Jl. MT Haryono RT. 010 RW. 003, Kel. Kapuas Kanan Hulu, Kec. Sintang, Kab. Sintang, Kalimantan Barat 78614
T: +62 565 2028298
F: +62 565 2028456

## KALIMANTAN TENGAH
### CENTRAL KALIMANTAN

**Kantor Cabang**
Branch Offices

**Palangkaraya - Tjilik Riwut**
Jl. Tjilik Riwut KM 1 No. 68, Kel. Palangka, Kec. Jekan Raya, Kota Palangkaraya, Kalimantan Tengah 73112
T: +62 536 3247070
F: +62 536 3247080

**Kantor Cabang Pembantu**
Sub-Branch Offices

**A.Yani - Sampit**
Jl. A Yani No. 155 RT. 023 RW. 001, Kel. Mentawai Baru Hulu, Kec. Mentawa Baru Ketapang, Kab. Kotawaringin Timur, Kalimantan Tengah 74322
T: +62 531 23488
F: +62 531 25355

**Pangeran Antasari - Pangkalan Bun**
Jl. Pangeran Antasari - Jl. H. Udan Said RT. 003 Kota Pangkalan Bun, Kel. Baru, Kec. Arut Selatan, Kab. Kotawaringin Barat, Kalimantan Tengah 74113
T: +62 532 28900
F: +62 532 28910

**Kantor Fungsional Operasional (KFO) Funding**
Funding Operational Functional Offices

**Sebabi - Kotawaringin Timur**
Jl. Jendral Sudirman KM 85 RT. 010 RW. 001, Kel. Sebabi, Kec. Telawang, Kab. Kotawaringin Timur, Kalimantan Tengah 74353
T : +62 531 2068482
F : +62 531 2068493

## KALIMANTAN SELATAN
### SOUTH KALIMANTAN

**Kantor Cabang**
Branch Offices

**Banjarmasin - MT Haryono**
Jl. MT Haryono No. 40 RT. 006, Kel. Kertak Baru Ilir, Kec. Banjar Tengah, Kota Banjarmasin, Kalimantan Selatan 70111
T: +62 511 3351333
F: +62 511 3359000

**Kantor Cabang Pembantu**
Sub-Branch Offices

| | | |
|---|---|---|
| **Batulicin - Tanah Bumbu**<br>Jl. Raya Batulicin, Kel. Kampung Baru, Kec. Simpang Empat, Kab. Tanah Bumbu, Kalimantan Selatan 72000<br>T: +62 518 70125<br>F: +62 518 70124 | **A.Yani - Banjarmasin**<br>Jl. A Yani KM 3 No. 104, Kel. Kebun Bunga, Kec. Banjarmasin Timur, Kota Banjarmasin, Kalimantan Selatan 70235<br>T: +62 511 3252882<br>F: +62 511 3252973 | **Sungai Danau - Tanah Bumbu**<br>Jl. Propinsi No. 230 RT. 005 Dusun II, Kel. Sungai Danau, Kec. Satui, Kab. Tanah Bumbu, Kalimantan Selatan 72275<br>T: +62 512 61167<br>F: +62 512 61165 |
| **A.Yani - Martapura**<br>Jl. A Yani KM 375, Kel. Sungai Paring, Kec. Martapura, Kab. Banjar, Kalimantan Selatan 71213<br>T: +62 511 4780456<br>F: +62 511 4788992 | | |

## KALIMANTAN TIMUR
### EAST KALIMANTAN

**Kantor Cabang Pembantu**
Sub-Branch Offices

| | |
|---|---|
| **Balikpapan - Sudirman**<br>Jl. Jend. Sudirman No. 7 RT. 032, Kel. Klandasan Ilir, Kec. Balikpapan Kota, Kota Balikpapan, Kalimantan Timur 76113<br>T: +62 542 7205775<br>F: +62 542 7205705 | **Samarinda - Pangeran Antasari**<br>Jl. Pangeran Antasari RT. 062 RW. 000, Kel. Teluk Lerong Ulu, Kec. Sungai Kunjang, Kota Samarinda, Kalimantan Timur 75127<br>T: +62 541 746110<br>F: +62 541 746120 |

**Kantor Cabang Pembantu**
Sub-Branch Offices

| | | |
|---|---|---|
| **Tanjung Redeb - Berau**<br>Jl. SA Maulana No. 26-27 RT. 011, Kel. Tanjung Redeb, Kec. Tanjung Redeb, Kab. Berau, Kalimantan Timur 77311<br>T: +62 554 2025888<br>F: +62 554 2025356 | **Balikpapan Baru - Balikpapan**<br>Komplek Balikpapan Baru, Ruko Sentral Eropa Blok AB7 No. 38, Kel. Damai Baru, Kec. Balikpapan Selatan, Kota Balikpapan, Kalimantan Timur 76114<br>T: +62 542 7204448<br>F: +62 542 7208886 | **Ahmad Dahlan - Samarinda**<br>Jl. Ahmad Dahlan Ruko No. 3, Kel. Sungai Pinang Luar, Kec. Samarinda Kota, Kota Samarinda, Kalimantan Timur 75117<br>T: +62 541 746121<br>F: - |
| **PSM Sungai Basung - Kutai Barat**<br>PT. Kruing Lestari Jaya Sungai Basung Estate, Desa/Kel. Besiq, Kec. Damai, Kab. Kutai Barat, Kalimantan Timur 75777<br>T : 082251044694<br>F : - | | |

**Kantor Fungsional Operasional (KFO) Funding**
Funding Operational Functional Offices

**PSM3 Muara Wahau - Kutai Timur**
Komplek Emplasment Jakluay, Kel. Jak Luay, Kec. Muara Wahau, Kab. Kutai Timur, Kalimantan Timur 75655
T : -
F : -

## KALIMANTAN UTARA
### NORTH KALIMANTAN

**Kantor Fungsional Operasional (KFO) Funding**
Funding Operational Functional Offices

**Tarakan - Yos Sudarso**
Jl. Yos Sudarso No. 9, Kel. Selumit, Kec. Tarakan Tengah,
Kota Tarakan, Kalimantan Utara 77113
T: +62 551 32566
F: +62 551 32564

## SULAWESI UTARA
### NORTH SULAWESI

**Kantor Cabang**
Branch Offices

**Manado - Sam Ratulangi**
Jl. Sam Ratulangi No. 18, Kel. Wenang, Kec. Wenang,
Kota Manado, Sulawesi Utara 95111
T: +62 431 879584
F: +62 431 879595

**Kantor Cabang Pembantu**
Sub-Branch Offices

**Wolter Monginsidi - Bitung**
Jl. Wolter Monginsidi No. 14 D, Kel. Wagurer Timur,
Kec. Madidir, Kota Bitung, Sulawesi Utara 95541
T : +62 438 38511
F : -

**Kantor Fungsional Operasional (KFO) Funding**
Funding Operational Functional Offices

**Babe Palar - Tomohon**
Jl. Babe Palar, Kel. Matani 3, Kec. Tomohon Tengah,
Kota Tomohon, Sulawesi Utara 95443
T : +62 431 3159516
F : -

## SULAWESI TENGAH
### CENTRAL SULAWESI

**Kantor Cabang**
Branch Offices

**Palu - Masjid Raya Lolu**
Jl. Masjid Raya Lolu No. 10, Kel. Lolu Utara, Kec. Palu Selatan,
Kota Palu, Sulawesi Tengah 94125
T: +62 451 458058
F: +62 451 455911

**Kantor Cabang Pembantu**
Sub-Branch Offices

**Luwuk - Banggai**
Jl. Kompleks luwuk shopping Mall Blok Timur No. 21, Kel. Luwuk,
Kec. Luwuk, Kab. Banggai, Sulawesi Tengah 94700
T : +62 461 23555
F : +62 461 325141

**Kantor Fungsional Operasional (KFO) Funding**
Funding Operational Functional Offices

**Dewi Sartika - Palu**
Komp. Ruko Dewi Sartika Jl. Dewi Sartika, Kel. Birobuli Utara,
Kec. Palu Selatan, Kota Palu, Sulawesi Tengah 94231
T : +62 451 486444
F : +62 451 484141

## SULAWESI SELATAN
### SOUTH SULAWESI

**Kantor Cabang**
Branch Offices

**Makassar - Pengayoman**
Komp. Panakukang Mas Jl. Pengayoman No. 182, Kel. Kawurisi Utara Masale, Kec. Panakkukang, Kota Makassar, Sulawesi Selatan 90000
T: +62 411 4663001
F: +62 411 4663002

**Kantor Cabang Pembantu**
Sub-Branch Offices

**Manggis - Makassar**
Jl. Manggis No. 1 (Jl. Arief Rate), Kel. Losari, Kec. Ujung Pandang, Kota Makassar, Sulawesi Selatan 90144
T: +62 411 858700
F: +62 411 858477

**Veteran - Pare-Pare**
Jl. Veteran No. 40 RT. 001 RW. 004, Kel. Ujung, Kec. Ujung Sabbang, Kota Pare-pare, Sulawesi Selatan 91114
T: +62 421 27328
F: +62 421 24935

**Langsat - Bone**
Jl. Langsat, Kel. Macege, Kec. Tanete Riattang Barat, Kab. Bone, Sulawesi Selatan 92733
T: +62 481 28679
F: +62 481 28783

**Lagaligo - Palopo**
Jl. Kelapa RT. 001 RW. 004, Kel. Lagaligo, Kec. Wara, Kota Palopo, Sulawesi Selatan 91000
T : +62 471 351165
F : +62 471 351165

**Kantor Fungsional Operasional (KFO) Funding**
Funding Operational Functional Offices

**MTC - Makassar**
Jl. A Yani MTC Lantai G Blok A No. 11-12, Kel. Baru, Kec. Ujung Pandang, Kota Makassar, Sulawesi Selatan 90111
T : +62 411 3632992
F : +62 411 3632992

**Kantor Fungsional Operasional (KFO) Lending**
Lending Operational Functional Offices

**Perintis Kemerdekaan - Makassar**
Jl. Perintis Kemerdekaan KM 11 No. 13 (Ruko Permata Biru) RT. 001 RW. 003, Kel. Tamalanrea, Kec. Biringkanaya, Kota Makassar, Sulawesi Selatan 90245
T: +62 411 581898
F: +62 411 4771800

**Sultan Hasanuddin - Gowa**
Jl. Sultan Hasanuddin No. 102, Kel. Pandang-Pandang, Kec. Somba Opu, Kab. Gowa, Sulawesi Selatan 92000
T: +62 411 889936
F: +62 411 888159

## SULAWESI TENGGARA
### SOUTHEAST SULAWESI

**Kantor Cabang**
Branch Offices

**Kendari - MT. Haryono**
Jl. MT Haryono No. 88 A, Kel. Wua-Wua, Kec. Kadia, Kota Kendari, Sulawesi Tenggara 93117
T: +62 401 3193081 / 3191990
F: +62 401 3191911

**Kantor Cabang Pembantu**
Sub-Branch Offices

**Bataraguru - Bau-Bau**
Jl. Bataraguru No. 70, Kel. Wajo, Kec. Murhum, Kota Bau – Bau, Sulawesi Tenggara 93721
T : +62 402 2811182
F : -

**Kantor Fungsional Operasional (KFO) Funding**
Funding Operational Functional Offices

**Christina M. Tiahahu - Kendari**
Jl. Christina M Tiahahu (Ex. Jl. DI Panjaitan) RT. 001 RW. 001, Kel. Lepo-Lepo, Kec. Baruga, Kota Kendari, Sulawesi Tenggara 93116
T: +62 401 3191865
F: +62 401 3191865

**Bunggasi - Kendari**
Jl. Bunggasi RT. 001 RW. 002, Kel. Anduonohu, Kec. Poasia, Kota Kendari, Sulawesi Tenggara 93232
T: 085240134333
F: -

## GORONTALO

**Kantor Cabang**
Branch Offices

**Gorontalo - Agus Salim**
Jl. KH Agus Salim (Basuki Rachmat) No. 11 RT. 003 RW. 004,
Kel. Limba B, Kec. Kota Selatan, Kota Gorontalo, Gorontalo 96115
T: +62 435 828365
F: +62 435 824370

**Kantor Fungsional Operasional (KFO) Funding**
Funding Operational Functional Offices

**Jhon Ario Katili - Gorontalo**
Jl. Prof. DR. Jhon Ario Katilli No. 296 (Ex. Jl. Andalas No. 296) RT. 002 RW. 001,
Kel. Paguyaman, Kec. Kota Tengah, Kota Gorontalo, Gorontalo 96127
T : +62 435 824115
F : -



## SULAWESI BARAT
### WEST SULAWESI

**Kantor Cabang**
Branch Offices

**Mamuju - KS Tubun**
Jl. KS Tubun, Kel. Rimuku, Kec. Mamuju,
Kab. Mamuju, Sulawesi Barat 91511
T: +62 426 2323161
F: +62 426 2323162

## MALUKU

**Kantor Cabang**
Branch Offices

**Ambon - A Yani**
Jl. Ahmad Yani RT. 006 RW. 001, Kel. Batu Meja,
Kec. Sirimau, Kota Ambon, Maluku 97125
T: +62 911 321500 / 321501
F: +62 911 321508

**Kantor Fungsional Operasional (KFO) Funding**
Funding Operational Functional Offices

**Sam Ratulangi - Ambon**
Jl. Sam Ratulangi No. 78, Kel. Honipopu,
Kec. Sirimau, Kota Ambon, Maluku 97126
T : +62 911 321506 / 321509 / 321510
F : -

## MALUKU UTARA
### NORTH MALUKU

**Kantor Cabang**
Branch Offices

**Ternate - Kamboja**
Jl. Kamboja (Jl. Perikani) RT. 002 RW. 001, Kel. Takoma,
Kec. Ternate Selatan, Kota Ternate, Maluku Utara 97714
T: +62 921 3125100
F: +62 921 3128500

## PAPUA BARAT
### WEST PAPUA

**Kantor Cabang**
Branch Offices

**Yos Sudarso - Manokwari**
Jl. Yos Sudarso No. 99, Kel. Sanggeng, Kec. Manokwari Barat,
Kota Manokwari, Papua Barat 98312
T : +62 986 216055
F : +62 986 216054

## PAPUA

**Kantor Cabang**
Branch Offices

**Jayapura - Pasifik Permai**
Jl. Komp. Pasifik Permai Blk F No. 7-8, Kel. Bhayangkara,
Kec. Jayapura Utara, Kota Jayapura, Papua 99112
T: +62 967 550410
F: +62 967 550411

**Kantor Fungsional Operasional (KFO) Funding**
Funding Operational Functional Offices

**PT.SKIP Lereh - Jayapura**
PT. SKIP Kasuari Mill, Kel. Lereh, Kec. Kaureh, Kab. Jayapura, Papua 99352
T : 08114816162
F : -

## PAPUA SELATAN
### SOUTH PAPUA

**Kantor Cabang**
Branch Offices

**Merauke - Mandala**
Jl. Raya Mandala No. 428, Kel. Mandala,
Kec. Merauke, Kab. Merauke, Papua Selatan 99616
T : +62 971 324926
F : -

## PAPUA TENGAH
### CENTRAL PAPUA

**Kantor Cabang Pembantu**
Sub-Branch Offices

**Merdeka - Nabire**
Jl. Merdeka Ruko JDF No. 1, Kel. Karang Mulia,
Kec. Nabire, Kab. Nabire, Papua Tengah 98815
T : +62 984 23851
F : +62 984 23161

## PAPUA BARAT DAYA
### SOUTHWEST PAPUA

**Kantor Cabang**
Branch Offices

**Sorong - A Yani**
Jl. A Yani Kld I RT. 004 RW. 006 Distrik Sorong Kota,
Kel. Klakublik I, Kec. Sorong, Kota Sorong, Papua Barat Daya 98414
T : +62 951 333143
F : +62 951 332143



# PEMBAHASAN DAN ANALISIS MANAJEMEN

## Management Discussion and Analysis



.04

# STRATEGI USAHA 2024
## Business Strategy 2024



Pada tahun 2024, strategi dan kebijakan strategis yang diterapkan oleh Bank untuk mendukung pencapaian usaha, antara lain:

**Penghimpunan Dana Pihak Ketiga**
- Melakukan *tier-based approach* dengan memfokuskan nasabah-nasabah existing yang mempunyai *Asset Under Management* (AUM) <Rp500 juta.
- Meningkatkan akuisisi nasabah baru, baik dari segi individu maupun korporasi.
- Meningkatkan aktivitas dan promosi khusus segmentasi prioritas dengan mengadakan berbagai kegiatan.
- Mengelola *cost of fund.*

**Penyaluran Dana**
- Meningkatkan penyaluran kredit secara *prudent* dan selektif dengan mempertimbangkan prospek pertumbuhan usaha yang baik.
- Meningkatkan portofolio surat berharga, sebagai alternatif sumber pendapatan di luar kredit.

**Pengembangan Digital Banking**
- Mengembangkan *digital banking* yang berfokus pada pengalaman nasabah (*customer experience centricity*) sehingga dapat mengembangkan fitur sesuai dengan preferensi & kebutuhan nasabah.
- Melakukan inovasi secara berkelanjutan terhadap pengembangan produk dan layanan *digital* yang relevan dan sesuai dengan kebutuhan pasar.
- Memperkuat *cyber security* untuk memastikan keamanan nasabah dalam bertransaksi.

**Peningkatan Pendapatan Operasional diluar Bunga**
- Menjalin keagenan dan kerja sama pada sistem pembayaran dan *elektronic banking*.
- Berkolaborasi dengan pihak ketiga yang memiliki customer base yang luas dengan skema *open banking*.
- Menambah fitur-fitur pada layanan internet dan *mobile banking* yang dilakukan sendiri atau melalui kerja sama dengan pihak ketiga secara berkesinambungan melakukan pengembangan pada sistem pembayaran.

In 2024, the strategies and strategic policies implemented by the Bank to support business performance include:

**Third-Party Funds Mobilization**
- Implementing a tier-based approach by focusing on existing customers with assets under management (AUM) of less than Rp500 million.
- Increasing the acquisition of new customers, both individual and corporate.
- Enhancing activities and promotional efforts targeting the priority segment through various events.
- Managing the cost of funds effectively.

**Fund Distribution**
- Increasing loan disbursement in a prudent and selective manner, considering strong business growth prospects.
- Expanding the securities portfolio as an alternative income source beyond lending activities.

**Digital Banking Development**
- Develop digital banking that focuses on customer experience centricity so as to develop features according to customer preferences & needs.
- Continuously innovating in the development of relevant digital products and services tailored to market needs.
- Strengthening cybersecurity to ensure secure transactions for customers.

**Increase in Operating Income Excluding Interest**
- Establishing agency relationships and partnerships in payment systems and electronic banking.
- Collaborating with third parties that have a broad customer base through open banking schemes.
- Continuously enhancing internet and mobile banking features, either independently or in cooperation with third parties, while also developing payment systems on an ongoing basis.

# TINJAUAN KINERJA PER SEGMEN USAHA
## Performance Review Per Business Segment

PT. Bank Sinarmas Tbk. ("Bank Sinarmas" atau "Bank") membagi segmen usaha menjadi 5 (lima): Penghimpunan Dana Pihak Ketiga; Penyaluran Kredit; *Treasury*; Ekspor dan Impor; serta Perbankan Syariah. Uraian kinerja masing-masing segmen tersebut diungkapkan melalui pembahasan di bawah ini.

PT. Bank Sinarmas Tbk. ("Bank Sinarmas" or "Bank") divides its business segments into 5 (five): Third Party Funds Collection; Loan Disbursement; Treasury; Export and Import; and Sharia Banking. The performance of each segment is disclosed through the following discussion.

### PENGHIMPUNAN DANA

Segmen usaha penghimpunan dana menyediakan produk dan jasa yang mencakup giro, tabungan, dan deposito berjangka. Bank Sinarmas menyediakan pilihan beragam mata uang pada produk giro, yakni dari Rupiah (Rp), Dolar Amerika Serikat (USD), Dolar Singapura (SGD), Euro (EUR), Dolar Australia (AUD), Yen Jepang (JPY), serta Yuan Tiongkok (CNY).

Sedangkan untuk deposito, mata uang yang dilayani adalah Rp, USD, AUD, JPY, dan CNY. Bank juga memberikan tenor yang lebih panjang, yakni hingga 36 bulan.

Sementara untuk tabungan, mata uang yang dilayani adalah USD, SGD, CNY, EUR, AUD, NZD, dan GBP.

### FUND COLLECTION

The fund collection business segment offers products and services that include demand deposits, savings accounts, and time deposits. Bank Sinarmas offers a variety of currency options for demand deposit products, namely Rupiah (Rp), United States Dollars (USD), Singapore Dollars (SGD), Euros (EUR), Australian Dollars (AUD), Japanese Yen (JPY), and Chinese Yuan (CNY).

In time deposits, the currencies served are Rp, USD, AUD, JPY, and CNY. The tenor offered is longer, up to 36 months.

Meanwhile, for savings, the currencies served are USD, SGD, CNY, EUR, AUD, NZD, and GBP.

#### Produk Penghimpunan Dana
**Fund Collection Products**

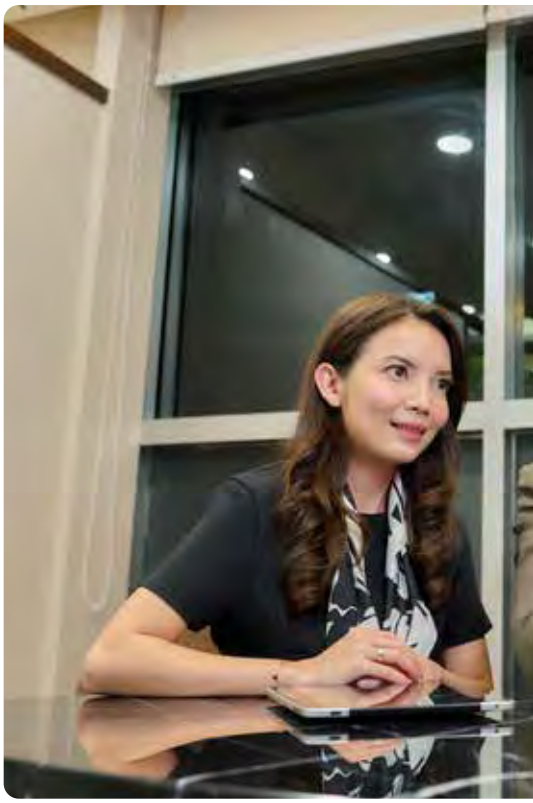
| Jenis Tabungan<br>Type of Savings | Uraian<br>Description |
|---|---|
| Tabungan Simas Bisnis | Tabungan untuk kegiatan usaha nasabah, baik nasabah perorangan maupun non-perorangan.<br>Savings for customers' business activities, both individual and non-individual customers |
| Tabungan Simas Diamond | Tabungan premium yang memberikan berbagai keuntungan untuk nasabah.<br>Premium savings that offer various benefits for customers. |
| Tabungan Simas Gold | Tabungan reguler dengan tarif rendah dan menawarkan berbagai promo menarik sepanjang tahun.<br>Regular savings with low fees and offer various attractive promotions throughout the year. |
| Tabungan Simas Payroll | Tabungan untuk kebutuhan pembayaran *payroll* karyawan.<br>Savings for employee payroll needs. |
| Tabungan Simas Digi | Tabungan yang diperuntukkan bagi nasabah baru, pembukaan rekening 100% *online* dan mudah, serta memberikan keuntungan bebas biaya.<br>Savings for new customers, with 100% online and easy account opening, and offer fee-free benefits. |
| Simas Tabungan Rencana (Simas TARA) | Tabungan dengan setoran bulanan untuk perencanaan keuntungan nasabah (*saving goals*) yang dilengkapi dengan layanan auto debit.<br>Savings with monthly deposits for customer profit planning (saving goals) equipped with auto debit services. |
| Tabungan Co-Branding | Tabungan dalam bentuk kerja sama dengan pihak ketiga.<br>Savings in the form of partnerships with third parties. |
| Tabungan RDP2P | Tabungan untuk kebutuhan transaksi nasabah dengan perusahaan *financial technology*.<br>Savings for customer transaction needs with financial technology companies. |
| Tabungan Simas Investor | Tabungan dengan keuntungan menarik khusus diperuntukkan bagi nasabah investor yang memiliki rekening dana nasabah di Bank Sinarmas.<br>Savings with attractive benefits specifically for investor customers who have customer fund accounts at Bank Sinarmas. |
| Simas Valas | Tabungan untuk memenuhi kebutuhan transaksi dalam valuta asing nasabah.<br>Savings to meet customer foreign currency transaction needs |
| TabunganKu | Tabungan dengan persyaratan mudah dan ringan untuk menumbuhkan budaya menabung masyarakat..<br>Savings with easy and light requirements to foster a savings culture among the community. |
| Simpanan Pelajar | Tabungan yang khusus diperuntukkan bagi pelajar, mulai dari Pendidikan Anak Usia Dini (PAUD) sampai dengan Sekolah Menengah Atas (SMA) atau sederajat untuk mendorong budaya menabung sejak dini.<br>Savings specifically for students, from Early Childhood Education (PAUD) to Senior High School (SMA) or equivalent, to encourage saving habits from an early age. |
| Simas Basic Savings Account | Tabungan dengan layanan keuangan tanpa kantor dalam rangka keuangan inklusi (laku pandai) untuk memperluas akses layanan perbankan masyarakat.<br>Savings with branchless financial services in order to promote financial inclusion (Laku Pandai) to expand public access to banking services. |

## Fokus dan Strategi 2024

Untuk mendukung kinerja usaha pada segmen penghimpunan dana, fokus dan strategi yang diterapkan oleh Bank sepanjang tahun 2024, antara lain :

1. Memperluas varian produk guna memenuhi kebutuhan nasabah di berbagai tahapan siklus hidup, dengan tujuan mendukung diversifikasi dan optimalisasi portofolio nasabah, termasuk melalui penawaran produk *bancassurance* dan produk *fee-based* lainnya.
2. Mendukung inisiatif segmentasi prioritas sebagai bagian dari proposisi nilai nasabah melalui implementasi program dan produk pendukung.
3. Mengembangkan potensi nasabah, khususnya melalui kanal daring, dengan memanfaatkan *mobile/internet banking* untuk optimalisasi *fee-based income*, pembukaan dan penempatan dana tanpa kunjungan fisik ke cabang, serta integrasi sistem untuk pembukaan tabungan daring dan *cross-selling* produk lainnya.
4. Meningkatkan akuisisi nasabah baru melalui kemitraan, dengan memfasilitasi pembukaan rekening tabungan daring untuk mendukung peningkatan literasi keuangan di Indonesia melalui proses *onboarding* yang disederhanakan.
5. Menjalankan aktivitas dan pengembangan produk serta program untuk meningkatkan pertumbuhan nasabah, Dana Pihak Ketiga (DPK) serta loyalitas nasabah dengan fokus utama pada program CASA.
6. Mengembangkan fitur dan layanan transaksi berbasis kartu ATM/Debit untuk mendorong peningkatan volume transaksi dan pendapatan *fee-based*, serta implementasi program berbasis transaksi untuk meningkatkan *customer value*.

Di tahun 2024 Bank Sinarmas melengkapi fasilitas layanan *priority banking* dengan peluncuran *debit card* Bank Sinarmas Prioritas.



## Kinerja Usaha 2024

Pada tahun buku 2024, Bank membukukan simpanan nasabah sebesar Rp36.535 miliar, naik 4,86% dibandingkan tahun sebelumnya yang Rp34.841 miliar. Komposisi simpanan tersebut: giro sebesar 44,19%, tabungan 30,79%, dan deposito 25,02%.

## Focus and Strategy 2024

To support business performance in the fund collection segment, the Bank laid the focus and executed the following strategies throughout 2024:

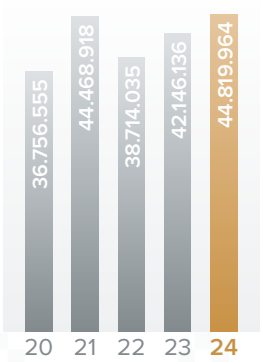
1. Expanding product variants to meet customer needs at various stages of the life cycle, with the aim of supporting diversification and optimization of customer portfolios through e.g. offering bancassurance products and other fee-based products.
2. Supporting priority segmentation initiatives as part of the customer value proposition through the implementation of supporting programs and products.
3. Developing customer potential, especially through online channels, by utilizing mobile/internet banking to optimize fee-based income, opening and placing funds without customer physical visits to branches, and system integration for opening online savings and cross-selling other products.
4. Increasing new customer acquisition through partnerships, by facilitating the opening of online savings accounts to help enhance financial literacy in Indonesia through a simplified onboarding process.
5. Carrying out activities and product development and programs to accelerate customer growth, Third Party Funds (DPK) while enhancing customer loyalty and keeping the main focus on the CASA program.
6. Developing ATM/Debit card-based transaction features and services to encourage increased transaction volume and fee-based income, as well as the implementation of transaction-based programs to increase customer value.

In 2024, Bank Sinarmas completed its priority banking service facilities with the launch of the Bank Sinarmas Prioritas debit card.

## Business Performance 2024

In fiscal 2024, the Bank recorded customer deposits of Rp36,535 billion, up 4.86% compared to Rp34,841 billion in 2023. The composition of these deposits is as follows: demand deposits with 44.19%, savings with 30.79%, and time deposits with 25.02%.

**DANA PIHAK KETIGA**
Third-Party Funds
**dalam juta Rupiah** | in millions Rupiah









Kenaikan Dana Pihak Ketiga dikontribusikan dari seluruh simpanan yaitu giro, tabungan dan deposito sejalan dengan strategi Bank yaitu meningkatkan *customer base* baik *retail* maupun korporasi dan meningkatkan penghimpunan Dana Pihak Ketiga melalui program promosi yang berdasarkan *tier-based approach* untuk nasabah baru maupun *existing*.

The increase in Third Party Funds was contributed from all deposits, namely demand deposits, savings and time deposits in line with the Bank's strategy to increase its customer base, both retail and corporate, and increase the collection of Third Party Funds through promotional programs based on a tier-based approach for new and existing customers.

## Komposisi Simpanan Konvensional
### Composition of Conventional Deposits

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Keterangan | 2024 | 2023 | 2022 | Pertumbuhan (Penurunan) (%) Growth (Decrease) | Description |
|---|---|---|---|---|---|
| Giro | 16.144.688 | 14.584.229 | 13.520.363 | 10,70 | Demand Deposit |
| Tabungan | 11.247.587 | 10.564.963 | 9.775.656 | 6,46 | Saving |
| Deposito Berjangka | 9.142.343 | 9.691.539 | 8.823.996 | (5,67) | Time Deposit |
| **Jumlah** | **36.534.618** | **34.840.731** | **32.120.015** | **4,86** | **Total** |

## Komposisi Giro Konvensional
### Composition of Conventional Demand Deposit

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Keterangan | 2024 | | 2023 | | Pertumbuhan (Penurunan) (%) Growth (Decrease) | Description |
|---|---|---|---|---|---|---|
| | Nominal | Komposisi Composition | Nominal | Komposisi Composition | | |
| Pihak Berelasi | 4.597.735 | 28,48 | 4.928.596 | **33,79** | (2,27) | Related Party |
| Pihak Ketiga | 11.546.953 | 71,52 | 9.655.633 | **66,21** | 12,97 | Third Party |
| **Jumlah** | **16.144.688** | **100,00** | **14.584.229** | **100,00** | **10,70** | **Total** |

Bank membukukan simpanan nasabah dalam bentuk giro konvensional pada tahun 2024 senilai Rp16.145 miliar, meningkat 10,70% dibandingkan tahun sebelumnya sebesar Rp14.584 miliar. Sebagian besar giro tersebut berasal dari pihak ketiga, yaitu 71,52% dari jumlah giro konvensional.

The Bank recorded customer deposits in the form of conventional demand deposits in 2024 of Rp16,145 billion, an increase of 10.70% compared to Rp14,584 billion in the previous year. The figure came mostly from third parties, accounting for 71.52% of the total conventional demand deposits.

## Kinerja Produk Tabungan Konvensional
### Performance of Conventional Savings

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Keterangan | 2024 | | 2023 | | Pertumbuhan (Penurunan) (%) Growth (Decrease) | Description |
|---|---|---|---|---|---|---|
| | Nominal | Komposisi Composition | Nominal | Komposisi Composition | | |
| Pihak Berelasi | 101.927 | 0,91 | 81.369 | 0,77 | 25,27 | Related Party |
| Pihak Ketiga | 11.145.660 | 99,09 | 10.483.594 | 99,23 | 6,32 | Third Party |
| **Jumlah** | **11.247.587** | **100,00** | **10.564.963** | **100,00** | **6,46** | **Total** |

Nilai tabungan konvensional yang terhimpun mencapai Rp11,248, naik 6,46% dibandingkan tahun sebelumnya, yaitu sebesar Rp10.565 miliar. Sebagian besar tabungan tersebut berasal dari pihak ketiga yang mencapai 99,09%.

The amount of conventional savings collected reached Rp11,248, up 6.46% compared to the previous year, which stood at Rp10,565 billion. The figure came mostly from the savings of third parties, accounting for 99.09%.

## Kinerja Produk Deposito Berjangka Konvensional
### Performance of Conventional Time Deposits

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Keterangan | 2024 | | 2023 | | Pertumbuhan (Penurunan) (%) Growth (Decrease) | Description |
|---|---|---|---|---|---|---|
| | Nominal | Komposisi Composition | Nominal | Komposisi Composition | | |
| Pihak Berelasi | 934.373 | 10,22 | 906.764 | 9,36 | 3,04 | Related Party |
| Pihak Ketiga | 8.207.970 | 89,78 | 8.784.775 | 90,64 | (6,57) | Third Party |
| **Jumlah** | **9.142.343** | **100,00** | **9.691.539** | **100,00** | **5,67** | **Total** |

Jumlah deposito berjangka konvensional pada tahun 2024 mencapai Rp9.142, lebih rendah 5,67% dibandingkan tahun sebelumnya yang sebesar Rp9.692 miliar. Sebagian besar deposito tersebut berasal dari pihak ketiga, yaitu sebesar 89,78%.

The amount of conventional time deposits in 2024 reached Rp9,142, 5.67% lower than the previous year, which stood at Rp9,692 billion. The figure mostly came from third parties, accounting for 89.78%.

## Kinerja Deposito Berjangka Konvensional berdasarkan Waktu
### Performance of Conventional Time Deposit

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Keterangan | 2024 | | 2023 | | Pertumbuhan (Penurunan) (%) Growth (Decrease) | Description |
|---|---|---|---|---|---|---|
| | Nominal | Komposisi Composition | Nominal | Komposisi Composition | | |
| < 1 bulan | 534.570 | 5,85 | 1.841.217 | 19,00 | (70,97) | Less than 1 month |
| 1 bulan | 5.172.118 | 56,57 | 4.807.975 | 49,61 | 7,57 | 1 month |
| 3 bulan | 1.860.998 | 20,36 | 1.723.129 | 17,78 | 8,00 | 3 months |
| 6 bulan | 638.354 | 6,98 | 719.987 | 7,43 | (11,34) | 6 months |
| 12 bulan | 713.631 | 7,81 | 585.014 | 6,04 | 21,99 | 12 months |
| > 12 bulan | 222.672 | 2,44 | 14.217 | 0,15 | 1.466,24 | Longer than 12 months |
| **Jumlah** | **9.142.343** | **100,00** | **9.691.539** | **100,00** | (5,67) | **Total** |

## Rencana Strategis 2025

1. Melakukan identifikasi dan penambahan nasabah *existing*, baik individu maupun korporasi dengan fokus kepada pendanaan murah dengan program *top up* maupun *cross sell*.
2. Meningkatkan akuisisi dan top up nasabah korporasi dengan meningkatkan fitur *internet banking corporate*, menawarkan layanan untuk transaksi korporasi seperti *payroll, bill payment, virtual account* dan sebagainya.
3. Melanjutkan fokus pada inisiatif segmentasi prioritas dengan ekspansi basis nasabah baru dan memperdalam relasi melalui program dan produk tambahan.
4. Mengeksplorasi potensi nasabah, khususnya melalui kanal *digital*, dengan memanfaatkan *mobile/internet banking* untuk optimalisasi *fee-based income*, pembukaan dan penempatan dana tanpa kunjungan fisik ke cabang, serta integrasi sistem untuk pembukaan tabungan daring dan *cross-selling* produk lainnya.
5. Memperluas akuisisi nasabah baru melalui kemitraan, dengan memfasilitasi pembukaan rekening tabungan daring untuk mendukung peningkatan literasi keuangan di Indonesia melalui proses *onboarding* yang disederhanakan, termasuk kolaborasi dengan institusi pendidikan seperti sekolah dan universitas.
6. Mengembangkan program berbasis kartu ATM/Debit untuk mendorong peningkatan volume transaksi dan pendapatan *fee-based*, serta meningkatkan *customer value* yang berkorelasi dengan peningkatan penempatan dana di Bank.
7. Memperluas basis nasabah yang memiliki kebutuhan akan *forex exposure* dan *trade finance*, sebagai fondasi bagi pengembangan produk perbankan valuta asing lainnya.
8. Melakukan evaluasi secara berkala terhadap kebijakan *pricing* yang berlaku pada setiap produk, yang diselaraskan dengan strategi Bank, dinamika industri perbankan, kebutuhan pendanaan untuk mendukung penyaluran kredit, dan peningkatan *core funding* dalam jangka panjang.
9. Meningkatkan aksesibilitas kanal selain *mobile banking* dan *internet banking* untuk memfasilitasi kemudahan transaksi perbankan bagi nasabah, melalui kolaborasi dengan mitra yang memiliki jaringan ekstensif dan reputasi terkemuka.
10. Mengintegrasikan fitur tambahan pada *mobile banking* Bank Sinarmas untuk memfasilitasi *cross-selling* produk *non-bank*, seperti pembelian Reksadana dan Bancassurance.
11. Memperkuat ekosistem bisnis nasabah korporasi di seluruh cabang Bank, dengan tujuan meningkatkan volume Dana Pihak Ketiga.

## Strategic Plan 2025

1. Identify and add existing customers, both individuals and corporations, focusing on low-cost funding through top-up and cross-sell programs.
2. Improve corporate Internet banking features and offer services for corporate transactions such as payroll, bill payments, virtual accounts, and so on to increase customer acquisition and top-up.
3. Continue to focus on priority segmentation initiatives by expanding the new customer base and deepening relationships through additional programs and products.
4. Explore customer potential, primarily through digital channels, by utilizing mobile/internet banking to optimize fee-based income, opening and placing funds without physical visits to branches, and system integration for opening online savings and cross-selling other products.
5. Expand new customer acquisition through partnerships by facilitating the opening of online savings accounts to support increased financial literacy in Indonesia through a simplified onboarding process, including collaboration with educational institutions such as schools and universities.
6. Develop ATM/Debit card-based programs to encourage increased transaction volume and fee-based income and increase customer value that correlates with increased placement of funds in the Bank.
7. Expand the customer base that needs forex exposure and trade finance, laying the foundation for the development of other foreign exchange banking products.
8. Periodically evaluate the pricing policies applicable to each product, which are aligned with the Bank's strategy, the dynamics of the banking industry, funding needs to support credit distribution, and increasing core funding in the long term.
9. Increase the accessibility of channels other than mobile banking and Internet banking to facilitate easy banking transactions for customers through collaboration with partners who have extensive networks and leading reputations.
10. Integrate additional features on Bank Sinarmas mobile banking to facilitate cross-selling of non-bank products, such as purchasing Mutual Funds and Bancassurance.
11. Strengthen the business ecosystem of corporate customers in all Bank branches, to increase the volume of Third Party Funds.

## PENYALURAN KREDIT

Penyaluran kredit merupakan aktivitas Bank dalam menyalurkan pembiayaan kepada nasabah, baik pembiayaan untuk modal kerja, investasi, maupun konsumsi. Segmentasi penyaluran kredit Bank terbagi menjadi usaha mikro, kecil dan menengah (MSME), komersial, korporat, dan konsumsi (*consumer*).

## LOANS DISBURSEMENT

Loans disbursement is the Bank's activity in funneling loans to customers for working capital, investment, and consumption. The Bank's loans disbursement segmentation is divided into micro, small and medium enterprises (MSME), commercial, corporate, and consumer.

### Produk Penyaluran Kredit
**Lending Products**

| Jenis Produk<br>Type of Product | Uraian | Description |
|---|---|---|
| **Segmen Mikro**<br>**Micro Segment** | | |
| Simas Kredit Usaha Rakyat (KUR) | Terdiri dari :<br>• KUR Mikro<br>• KUR Kecil<br>• KUR Khusus, kredit yang diberikan ke para pelaku usaha agribisnis (pertanian dan peternakan) dengan plafon maksimal Rp 500 juta/calon nasabah, dengan konsep *off taker*. | Consisting of:<br>• Micro KUR<br>• Small KUR<br>• Special KUR, credit given to agribusiness (farmers and livestock) with a maximum ceiling of Rp500 million/potential customer, with an off-taker concept. |
| Simas Kredit Usaha Kecil (KUK) | Kredit produktif yang diberikan ke pelaku usaha dengan plafon mulai dari Rp100 juta sampai dengan Rp2 miliar per nasabah. | Productive credit provided to business players with credit ceiling ranges from Rp100 million to Rp2 billion per customer. |
| Kredit Multiguna Usaha Petani Sawit (KMUPS) | Program kredit yang memfokuskan pada pemberian kredit ke para petani sawit untuk kebutuhan pembelian sarana produksi. | Credit programs focus on providing credit to oil palm farmers for the purchase of production facilities. |
| Produk Kerja Sama Penyaluran Kredit melalui Perusahaan *Digital Lending*<br>Credit Distribution Collaboration Products through Digital Lending Companies | Fasilitas kredit/pembiayaan dengan skema *channeling/referral* kredit dari perusahaan *peer to peer lending* dengan plafon maksimal Rp 2 miliar/ nasabah. | Credit/financing facilities with a channeling/credit referral scheme from peer to peer lending companies with a maximum ceiling of Rp2 billion/customer. |
| **Segmen Consumer**<br>**Consumer Segment** | | |
| KTA Payroll<br>Payroll Personal Loan | Kredit tanpa agunan berjangka waktu 1-5 tahun untuk karyawan dari perusahaan yang pembayaran payroll melalui Bank Sinarmas | Collateral-free credit with a term of 1-5 years for employees of companies whose payroll payments are made through Bank Sinarmas |
| Kredit Pemilikan Rumah (KPR)<br>Mortgage | Kredit yang bertujuan untuk pembelian property, terdiri dari<br>• KPR primary/baru untuk rumah, apartment dan ruko, baik inden maupun *ready stock*<br>• KPR take over untuk rumah dan apartment berjangka waktu hingga 25 tahun. Limit KPR mulai dari Rp500 juta hingga Rp25 miliar. | Loans intended for the purchase of property, consisting of<br>• Primary / new mortgages for houses, apartments and shophouses, both indented and ready stock<br>• Takeover mortgages for houses and apartments with a term of up to 25 years. Mortgage limits range from Rp500 million to Rp25 billion. |
| Kredit Multiguna (KMG)<br>Multipurpose Loan | Kredit untuk tujuan multiguna, yang terdiri dari KMG dengan jaminan *fixed asset*. | Loans for multipurpose purposes, consisting of KMG secured by fixed assets. |
| Kredit Kepemilikan Mobil (KPM)<br>Auto Loan | Kredit yang ditujukan untuk pembelian mobil baru, berjangka waktu 1-3 tahun. Bank Sinarmas bekerja sama dengan perusahaan-perusahaan yang mau meningkatkan loyalitas karyawan berprestasi dengan memberikan *benefit* berupa fasilitas COP. | Loans intended for the purchase of new cars, with a term of 1-3 years. Bank Sinarmas cooperates with companies that want to increase the loyalty of outstanding employees by providing benefits in the form of COP facilities. |
| **Segmen Usaha Kecil dan Menengah (SME *Loan*)**<br>**Small and Medium Enterprises Segment (SME Loan)** | | |
| Simas Dana Tunai (SDT) | Fasilitas Kredit produktif yang diberikan kepada pelaku usaha, baik perorangan atau badan usaha, dengan plafon mulai dari Rp1 miliar sampai dengan Rp 5 miliar . | Productive credit facilities provided to business actors, both individuals and business entities, with a ceiling of Rp1 billion to Rp5 billion. |
| Perluasan Agunan<br>Collateral Expansion | Kredit dengan jaminan produk investasi berupa *bancassurance* dan reksadana yang diterbitkan oleh *Financial Service Company*, baik yang dipasarkan langsung maupun yang dipasarkan melalui pihak lain. | Credit with investment product collateral in the form of bancassurance and mutual funds issued by Financial Service Companies, both marketed directly and marketed through other parties. |
| *Back to Back* | Fasilitas Kredit yang dijamin dengan agunan tunai minimal sebesar 100%. Agunan tunai yang dimaksud dapat berupa deposito berjangka maupun setoran jaminan. | Credit facilities secured by cash collateral of at least 100%. The referred cash collateral can be in the form of term deposits or guarantee deposits. |

| Jenis Produk<br>Type of Product | Uraian | Description |
|---|---|---|
| *Supply Chain Financing* (SCF) | Fasilitas kredit yang diberikan kepada *Vendor*/ Kontraktor dari Sinarmas *Land Group* untuk tujuan modal kerja. | Credit facility provided to Vendors/ Contractors from Sinarmas Land Group for working capital purposes. |
| Kredit Modal Kerja<br>Working Capital Loan | Fasilitas kredit dengan jangka waktu relatif pendek umumnya (± 1 tahun) yang digunakan untuk modal kerja usaha dengan plafon sampai dengan Rp 15 miliar. | Credit facilities with a relatively short term generally (± 1 year) are used for business working capital with a ceiling of up to Rp15 billion. |
| Kredit Investasi<br>Investment Loan | Fasilitas kredit dengan jangka waktu lebih dari 1 tahun yang digunakan untuk tujuan Investasi dengan plafon sampai dengan Rp 15 miliar. | Credit facility with a term of more than 1 year used for investment purposes with a ceiling of up to Rp 15 billion. |
| **Segmen Korporat**<br>**Corporate Segment** | | |
| Modal Kerja<br>Working Capital | Fasilitas kredit dengan jangka waktu relatif pendek umumnya (± 1 tahun) yang digunakan untuk modal kerja usaha dengan plafon > Rp75 miliar. | Credit facilities with a relatively short term generally (± 1 year) are used for working capital for businesses with a ceiling of > Rp75 billion. |
| Investasi<br>Investment | Fasilitas kredit dengan jangka waktu lebih dari 1 tahun yang diberikan kepada badan usaha untuk tujuan investasi dengan plafon > Rp75 miliar. | Credit facilities with a term of more than 1 year provided to business entities for investment purposes with a ceiling of > Rp75 billion. |
| | Penyaluran kredit dapat dilakukan secara langsung (bilateral) ataupun melalui skema sindikasi. | Credit distribution can be done directly (bilaterally) or through a syndication scheme. |
| **Segmen Komersial**<br>**Commercial Segment** | | |
| Modal Kerja<br>Working Capital | Fasilitas kredit dengan jangka waktu relatif pendek (± 1 tahun) yang digunakan untuk modal kerja usaha dengan plafon > Rp15 miliar-Rp75 miliar. | Credit facilities with a relatively short term (± 1 year) used for working capital with a ceiling of > Rp15 billion-Rp75 billion. |
| Investasi<br>Investment | Fasilitas kredit dengan jangka waktu lebih dari 1 tahun yang diberikan kepada badan usaha untuk tujuan investasi. | Credit facilities with a term of more than 1 year provided to business entities for investment purposes. |
| Supply Chain Financing & Distributor Financing | Fasilitas kredit modal kerja yang diberikan oleh Bank kepada Debitur yang merupakan :<br>1. Pihak pembeli (*Distribution*/ *Sub-Distributor*) untuk melakukan pembelian barang dagangan dari pihak penjual (*Principal*/ *Distributor*) dalam satu mata rantai bisnis atau<br>2. *Supplier*/ *Vendor*/ Kontraktor yang melakukan pengadaan barang dan/ atau jasa kepada *Principal*. | Working capital credit facilities are provided by the Bank to eligible Debtors who are:<br>1. Buyers (Distribution/ Sub-Distributors) to purchase merchandise from sellers (Principal/ Distributor) in one business chain or<br>2. Suppliers/ Vendors/ Contractors who procure goods and/ or services for the Principal. |

## Fokus dan Strategi 2024

Pada tahun 2024, fokus dan strategi yang telah direalisasikan untuk meningkatkan kinerja penyaluran kredit diuraikan melalui tabel di bawah ini.

## Focus and Strategy 2024

The following table describes the focus and strategies executed to improve credit distribution performance in 2024.

| Segmen<br>Segment | Fokus dan Strategi 2024 | Focus and Strategy in 2024 |
|---|---|---|
| Segmen Mikro<br>Micro Segment | Penyaluran kredit dengan plafond mulai dari Rp 100 juta sampai dengan Rp 2 miliar, fokus pada :<br>- Simas KUK.<br>- KUR sesuai kuota yang telah disetujui oleh pemerintah.<br>- Penyaluran ke petani sawit melalui produk Kredit Multiguna Petani Sawit (KMUPS).<br>- Membuat *campaign* program, baik *campaign Top Up* Debitur, penyaluran melalui chanel Danamas untuk memperbanyak agen chanel penyaluran kredit mikro.<br>- Melakukan promosi melalui *flyer, banner*, spanduk dan *digital marketing* dengan media IG Bank Sinarmas, TV disetiap cabang.<br>- Mengembangkan akusisi melalui UR dan E-Form yang dapat diakses secara mandiri oleh calon debitur.<br>- Untuk meningkatkan iklim kompetisi pada seller di cabang, dibuat program *sales reward*. | Credit distribution with a ceiling of Rp100 million to Rp2 billion, focusing on:<br>- Simas KUK.<br>- KUR according to the quota approved by the government.<br>- Distribution to oil palm farmers through the Oil Palm Farmers Multipurpose Credit (KMUPS) product.<br>- Creating campaign programs, both Debtor Top Up campaigns, distribution through the Danamas channel to increase the number of micro credit distribution channel agents.<br>- Running promotional campaigns through Flyers, Banners, banners and digital marketing with Bank Sinarmas IG media, TV in each branch.<br>- Expanding acquisitions through UR and E-Forms that can be accessed independently by prospective debtors.<br>- Improving the competitive climate for sellers in branches, creating a sales reward program |

| Segmen<br>Segment | Fokus dan Strategi 2024 | Focus and Strategy in 2024 |
|---|---|---|
| Segmen Consumer<br>Consumer Segment | • Pada tahun berjalan, Divisi Consumer Loan terus mendorong pertumbuhan penyaluran kredit melalui produk Kredit Pemilikan Rumah (KPR), baik segmen Primary maupun Takeover, serta Kredit Tanpa Agunan (KTA) Payroll.<br>• Untuk meningkatkan akuisisi kedua produk tersebut, dilakukan berbagai inisiatif seperti event gathering, sosialisasi ke perusahaan, serta kunjungan langsung ke agen properti dan developer.<br>• Dalam menjaga kualitas portofolio yang telah disalurkan, dilakukan upaya monitoring fasilitas kredit secara proaktif, baik sebelum jatuh tempo melalui pengiriman pengingat (reminder), maupun monitoring harian dan bulanan terhadap seluruh portofolio kredit.<br>• Consumer Loan juga berkolaborasi dengan unit SND dan Early Warning System untuk melakukan pemantauan terhadap perusahaan mitra KTA Payroll, guna memastikan langkah mitigasi risiko dapat segera diambil secara tepat waktu dan terukur.<br>• Kemampuan SDM ditingkatkan melalui training dan workshop | • In the current year, the Consumer Loan Division continues to drive credit distribution growth through Home Ownership Credit (KPR) products, both Primary and Takeover segments, as well as Payroll Unsecured Credit (KTA).<br>• To increase the acquisition of both products, various initiatives have been carried out such as gathering events, socialization to companies, and direct visits to property agents and developers.<br>• In maintaining the quality of the portfolio that has been distributed, efforts are made to monitor credit facilities proactively, both before maturity by sending reminders, as well as daily and monthly monitoring of the entire credit portfolio.<br>• Consumer Loan also collaborates with the SND and Early Warning System units to monitor KTA Payroll partner companies, to ensure that risk mitigation steps can be taken immediately in a timely and measurable manner.<br>• HR capabilities are improved through training and workshops |
| Segmen Usaha Kecil dan Menengah (SME *Loan*)<br>Small and Medium Enterprises Segment (SME Loan) | Penyaluran kredit dengan *plafond* mulai dari Rp1 miliar sampai dengan Rp15 miliar, fokus pada :<br>- SCF dengan vendor/kontraktor dari Sinarmas *Land Group*.<br>- *Back to back*.<br>- Perluasan Agunan.<br>- Simas Dana Tunai dan SME Umum.<br>- Melakukan media promosi melalui *flyer, banner* dan digital *marketing* dengan media IG Bank Sinarmas, TV di setiap cabang.<br>- Melakukan penawaran kredit melalui *WhatsApp* dan *email blast* khususnya untuk produk Simas Dana Tunai (SDT) dan Perluasan Agunan.<br>- Memberikan program *sales reward* untuk para *seller* khususnya untuk produk Simas Dana Tunai (SDT) dan SME Umum beragunan *fixed asset*.<br>- Program referal karyawan internal di cabang untuk produk Simas Dana Tunai & Kredit SME umum beragunan *fixed asset.*<br>- Melakukan *refreshment* produk SME *loan* ke tim *seller* di cabang. | Credit distribution with a ceiling of Rp1 billion to Rp15 billion, focusing on:<br>- SCF with vendors/contractors from Sinarmas Land Group.<br>- Back to back.<br>- Collateral Expansion.<br>- Simas Cash Fund and General SME.<br>- Running promotional media campaigns through flyers, banners and digital marketing with IG Bank Sinarmas media, TV in each branch.<br>- Making credit offers via WA and email blasts especially for Simas Cash Fund (SDT) and Collateral Expansion products.<br>- Providing sales reward programs for sellers especially for Simas Cash Fund (SDT) and General SME products secured by fixed assets.<br>- Internal employee referral program at branches for Simas Cash Fund & General SME Credit products secured by fixed assets<br>- Conducting SME loan product refreshment for the seller team at branches. |
| Segmen Korporat<br>Corporate Segment | • Meningkatkan jumlah kredit sindikasi, fokus pada penyaluran kredit ke perusahaan besar, *state-owned enterprises* dan perusahaan yang bergerak di bidang perdagangan dan jasa pengadaan yang memiliki prospek pertumbuhan usaha dan *track record* yang baik;<br>• Penyaluran kredit kepada Debitur dengan mempertimbangkan agunan *fixed asset* atau tunai (*back to back*) atau sumber pembayaran berdasarkan kontrak yang pasti dan jangka waktu yang relatif singkat serta memiliki prospek usaha yang baik;<br>• Menjaga kualitas portofolio kredit dengan memaksimalkan fungsi *early warning* dan pemantauan Debitur secara berkala atas kelangsungan usaha Debitur. | • Increasing the number of syndicated loans, focusing on distributing loans to large companies, state-owned enterprises and companies engaged in trade and procurement services that have good business growth prospects and track records;<br>• Distributing loans to Debtors by considering fixed asset collateral or cash (back to back) or payment sources based on definite contracts and relatively short terms and having good business prospects;<br>• Maintaining the quality of the credit portfolio by maximizing the early warning function and periodic monitoring of Debtors on the continuity of the Debtor's business. |
| Segmen Komersial<br>Commercial Segment | • Mengoptimalkan penyaluran kredit modal kerja skema *Supply Chain Financing* (SCF).<br>• Mengeksplorasi pembiayaan melalui kerjasama dengan perusahaan *Financial Technology* (P2P *Lending*);<br>• Menjaga kualitas portofolio kredit dengan memaksimalkan fungsi *early warning* dan pemantauan Debitur secara berkala atas kelangsungan usaha Debitur. | • Optimizing working capital credit distribution under the Supply Chain Financing (SCF) scheme.<br>• Exploring financing through collaboration with Financial Technology companies (P2P Lending);<br>• Maintaining the quality of the credit portfolio by maximizing the early warning function and periodic monitoring of Debtors on the continuity of the Debtor's business. |

## Kinerja Usaha 2024

Hingga akhir tahun buku 2024, *outstanding* penyaluran dana konvensional Bank mencapai Rp11.217 miliar, lebih rendah 4,50% dibandingkan tahun 2023 yang sebesar Rp11.746 miliar. Sebagian besar kredit tersebut terserap untuk kebutuhan modal kerja, yakni 55,28, selanjutnya investasi 22,44%, dan konsumsi 22,28%.

## Business Performance in 2024

By the end of fiscal 2024, the Bank had an outstanding conventional fund distribution of Rp11,217 billion, 4.50% lower than in 2023, which reached Rp11,746 billion. The loan figure was mostly absorbed for working capital needs, with 55.28% for investment with 22.44% and consumption with 22.28%.

### Kinerja Penyaluran Dana Konvensional
**Performance of Conventional Loan Disbursement**

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Keterangan<br>Description | 2024 | 2023 | 2022 | Pertumbuhan (Penurunan)<br>Increase (Decrease)<br>(%) |
|---|---|---|---|---|
| Modal Kerja<br>Working Capital | 6.200.762 | 5.346.969 | 4.935.105 | 15,97 |
| Investasi<br>Investment | 2.517.119 | 3.215.859 | 4.036.036 | (21,73) |
| Konsumsi<br>Consumer | 2.499.124 | 3.183.129 | 3.288.939 | (21,49) |
| **Jumlah**<br>**Total** | **11.217.005** | **11.745.957** | **12.260.080** | **(4,50)** |

Dari sisi kualitas, kredit bermasalah atau *Non Performing Loan* (NPL) bruto Bank sangat rendah, yakni 1,88%. Pencapaian itu lebih dari rata-rata industri yang mencapai 2,08%. Hal ini menunjukkan bahwa kinerja pengembalian dari penyaluran dana Bank sangat baik.

The Bank had a very low gross non-performing loan (NPL) of 1.88%. That achievement was much higher than the industry average of 2.08%. This shows the Bank's sound performance in terms of fund distribution return.

### Kualitas Penyaluran Dana Konvensional
**Quality of Conventional Loan Distribution**

dalam persen (%) I in percentage (%)

| Uraian | 2024 | 2023 | 2022 | Description |
|---|---|---|---|---|
| NPL Bruto | 1,88 | 0,94 | 10,27 | NPL Gross |
| NPL Neto | 0,38 | 0,48 | 3,20 | NPL Net |

## Rencana Strategis 2025

Uraian tentang rencana strategis segmen usaha penyaluran dana Bank untuk tahun 2025 diuraikan melalui tabel di bawah ini.

## Strategic Plan 2025

The Bank's strategic plan for the fund distribution business segment for 2025 is described in the table below.

| Segmen<br>Segment | Rencana Strategis 2025 | Strategic Plan 2025 |
|---|---|---|
| Segmen Mikro<br>Micro Segment | **Fokus pada :**<br>1. Penyaluran produk Simas KUK, KUR dan KMUPS<br>2. Menambah kota penyaluran Dana Usaha yang berkolaborasi dengan Danamas<br>3. Memaksimalkan penawaran kredit kepada debitur lancar yang masuk dalam *list Top Up* Insiaitif Bank (TUIB)<br>4. Memaksimalkan promosi melalui media UR & E-form, *Flyer*, TV di Cabang, IG Bank Sinarmas<br>5. Melakukan rekalibrasi secara periodik *mapping* titik pemasaran unit mikro, untuk unit-unit distribusinya rendah<br>6. Melakuan *mentoring*, sosialisasi dan *visit* cabang<br>7. *Training Introduction & Refreshment* kepada *Sales Micro Loan*<br>8. Untuk menciptakan iklim kompetisi maka dibuat *sales reward* ditambah dengan adanya skema insentif terbaru | **Focus on:**<br>1. Distribution of Simas KUK, KUR and KMUPS products<br>2. Adding cities for distributing Business Funds in collaboration with Danamas<br>3. Maximizing credit offers to current debtors who are included in the Bank's Top Up Initiative (TUIB) list<br>4. Maximizing promotional campaigns through UR & E-form media, Flyers, TV at Branches, IG Bank Sinarmas<br>5. Periodically recalibrating the mapping of micro unit marketing points, for units with low distribution<br>6. Conducting mentoring, socialization and branch visits<br>7. Introduction & Refreshment Training for Micro Loan Sales<br>8. Creating a competitive climate, sales rewards plus the latest incentive schemes |

| Segmen<br>Segment | Rencana Strategis 2025 | Strategic Plan 2025 |
|---|---|---|
| Segmen Consumer<br>Consumer Segment | **Strategi Kredit Konsumer untuk Tahun 2025**<br>Pada tahun 2025, strategi Divisi Consumer Loan tetap difokuskan pada pertumbuhan penyaluran Kredit Pemilikan Rumah (KPR) dan Kredit Tanpa Agunan (KTA) Payroll, dengan tetap mengedepankan prinsip kehati-hatian dan menjaga kualitas portofolio secara berkelanjutan.<br><br>Untuk mencapai target tersebut, strategi akuisisi dilakukan melalui kombinasi pendekatan event pemasaran, kemitraan strategis (partnership), dan penguatan kanal digital marketing guna menjangkau segmen nasabah yang lebih luas.<br><br>**Pengembangan Produk KPR**<br>Produk KPR diarahkan untuk terus tumbuh, melalui:<br>• Penambahan kerja sama dengan developer nasional premium dan selected local developer untuk mendorong penyaluran KPR primary.<br>• Peningkatan portofolio KPR Takeover sebagai salah satu pendorong pertumbuhan yang lebih cepat, dengan tetap menjaga kualitas aset kredit.<br>• Diversifikasi portofolio ke segmen KPR secondary market dilakukan secara selektif, dengan tetap memperhatikan profil risiko dan prospek wilayah properti.<br><br>**Penguatan KTA Payroll**<br>Menyesuaikan dengan kondisi pasar terkini, strategi KTA Payroll difokuskan pada:<br>• Penyempurnaan ketentuan dan kebijakan kredit untuk menjaga kualitas akuisisi dan mengendalikan potensi risiko sejak awal.<br>• Penambahan kemitraan strategis dengan institusi atau platform digital guna memperluas segmen sasaran.<br><br>Seluruh strategi tersebut dijalankan dengan semangat pertumbuhan yang sehat, berkelanjutan, dan adaptif terhadap dinamika pasar serta perubahan perilaku konsumen. | **Consumer Loan Strategy for 2025**<br>In 2025, the Consumer Loan Division will continue to focus on expanding the distribution of Home Ownership Loans (KPR) and Payroll Unsecured Loans (KTA), while upholding prudential principles and ensuring long-term portfolio quality.<br><br>To support these objectives, the acquisition strategy integrates marketing events, strategic partnerships, and the strengthening of digital marketing channels to broaden reach across diverse customer segments.<br><br>**Mortgage Development**<br>Growth in the KPR segment will be pursued through the following initiatives:<br>• Expanding partnerships with top-tier national and selected regional developers to boost primary market KPR distribution.<br>• Increasing the KPR Takeover portfolio as a key growth driver, while ensuring the underlying credit quality remains robust.<br>• Diversifying into the secondary KPR market through selective disbursement, with careful consideration of risk profiles and property area prospects.<br><br>**Strengthening KTA Payroll**<br>Aligned with prevailing market dynamics, the KTA Payroll strategy emphasizes:<br>• Refining credit policies and underwriting criteria to maintain acquisition quality and proactively mitigate potential risks.<br>• Establishing strategic collaborations with institutions and digital platforms to expand access to target customer segments.<br><br>All strategies are implemented with a commitment to healthy, sustainable growth, while remaining adaptive to evolving market conditions and shifts in consumer behavior. |
| Segmen Usaha Kecil dan Menengah (SME *Loan*)<br>Small and Medium Enterprises Segment (SME Loan) | **Fokus pada :**<br>1. Fokus Pemasaran Kredit:<br>a. Simas Dana Tunai (SDT)<br>b. SME Umum<br>c. Back to back<br>d. Perluasan Agunan<br>2. Melakukan penambahan cabang yang dapat memasarkan produk SME *Loan*, diantaranya yaitu di Kantor Cabang Pondok Indah JKT, Cabang Cirebon, Cabang Tegal, Cabang Puri Kembangan, Cabang Pekalongan<br>3. Melakukan beberapa pengembangan dalam alur proses kredit di SME *Loan* dari mulai proses akuisisi sampai proses *disburse*<br>4. Memaksimalkan pemakaian *line* kredit untuk produk SCF ke Vendor/Kontraktor dari Sinar Mas Land<br>5. Memaksimalkan promosi melalui *Flyer*, media TV di cabang dan IG Bank Sinarmas<br>6. Program *Referral* Karyawan Internal di cabang untuk produk Simas Dana Tunai & Kredit SME Umum beragunan *fixed asset*<br>7. Campaign Sales Reward untuk seller SME *Loan* untuk produk Simas Dana Tunai & Kredit SME Umum beragunan *fixed asset*<br>8. Memaksimalkan penggunaan *Unused loan* atas fasilitas kredit yang dimiliki debitur di SME *Loan*<br>9. Melakukan kolaborasi dengan Danamas dalam penyaluran produk Simas Dana Tunai (SDT) | **Focus on:**<br>1. Credit Marketing Focus:<br>a. Simas Cash Fund (SDT)<br>b. General SME<br>c. Back to back<br>d. Collateral Expansion<br>2. Adding branches to help market SME loan products, including at the Pondok Indah JKT Branch Office, Cirebon Branch, Tegal Branch, Puri Kembangan Branch, and Pekalongan Branch<br>3. Making further developments in the credit process flow at SME Loan from the acquisition process to the disbursement process<br>4. Maximizing the use of credit lines for SCF products to Vendors/Contractors from Sinar Mas Land<br>5. Maximizing promotional campaigns through Flyers, TV media at branches and Bank Sinarmas IG<br>6. Running Internal Employee Referral Program at branches for Simas Cash Fund & General SME Credit products secured by fixed assets<br>7. Running Sales Reward Campaign for SME Loan sellers for Simas Cash Fund & General SME Credit products secured by fixed assets<br>8. Maximizing the use of Unused loans for credit facilities owned by debtors at SME Loan<br>9. Collaborating with Danamas in distributing Simas Cash Fund (SDT) products |

| Segmen<br>Segment | Rencana Strategis 2025 | Strategic Plan 2025 |
|---|---|---|
| Segmen Korporat<br>Corporate Segment | Penyaluran kredit produktif akan tetap dilakukan dengan lebih selektif dan juga mengedepankan prinsip kehati-hatian serta prospek usaha berkelanjutan dari Debitur, melalui:<br>a. Meningkatkan jumlah kredit sindikasi, fokus pada perusahaan besar, *state-owned enterprise* dan perusahaan yang bergerak di bidang perdagangan dan jasa pengadaan yang memiliki prospek pertumbuhan usaha dan *track record* yang;<br>b. Penyaluran kredit kepada Debitur dengan mempertimbangkan agunan *fixed asset* atau tunai (*back to back*) atau sumber pembayaran berdasarkan kontrak yang pasti dan jangka waktu yang relatif singkat serta memiliki prospek usaha yang baik;<br>c. Menjaga kualitas portofolio kredit dengan memaksimalkan fungsi *early warning* dan pemantauan Debitur secara berkala atas kelangsungan usaha Debitur. | Further distribute productive credit more selectively with a priority on the principle of prudence and sustainable business prospects of the Debtor, through:<br>a. Increasing the number of syndicated credits, focusing on large companies, state-owned enterprises and companies engaged in trade and procurement services that have business growth prospects and track records;<br>b. Credit distribution to Debtors by considering fixed assets or cash collateral (back to back) or sources of payment based on definite contracts and relatively short terms and have good business prospects;<br>c. Maintaining the quality of the credit portfolio by maximizing the early warning function and periodic monitoring of Debtors on the continuity of the Debtor's business. |
| Segmen Komersial<br>Commercial Segment | Penyaluran kredit akan tetap dilakukan dengan lebih selektif dan juga mengedepankan prinsip kehati-hatian, melalui :<br>a. Penyaluran kredit modal kerja dengan skema *Supply Chain Financing* (SCF);<br>b. Mengeksplorasi pembiayaan melalui kerjasama dengan perusahaan *Financial Technology* (P2P *Lending*);<br>c. Menjaga kualitas portofolio kredit dengan memaksimalkan fungsi *early warning* dan pemantauan Debitur secara berkala atas kelangsungan usaha Debitur. | Further distribute credit more selectively with a priority on the principle of prudence, through:<br>a. Working capital credit distribution with the Supply Chain Financing (SCF) scheme;<br>b. Exploring financing through cooperation with Financial Technology companies (P2P Lending);<br>c. Maintaining the quality of the credit portfolio by maximizing the early warning function and periodic monitoring of Debtors on the continuity of the Debtor's business. |

## TREASURY

Sebagai bank devisa, layanan utama segmen usaha treasury Bank Sinarmas adalah perdagangan valuta asing. Bank memiliki produk valuta asing unggulan, yakni *plain vanilla*, seperti *today* (TOD), *tomorrow* (TOM), dan SPOT. Selain itu, layanan *plain vanilla derivatives*, seperti *forward* dan *swap*.

### Fokus dan Strategi 2024

Fokus dan strategi yang dilakukan Bank Sinarmas dalam rangka meningkatkan kinerja segmen *treasury* di tahun 2024 adalah pengembangan jumlah nasabah yang bertransaksi valuta asing. Selain itu, mengoptimalkan dana yang mengendap di Bank Sinarmas dengan melakukan penetrasi di pasar uang dan pasar modal.

### Kinerja Usaha 2024

Sepanjang tahun buku 2024, Bank berhasil membukukan *fee-based income* sebesar Rp236 miliar. Dibandingkan tahun 2023 yang sekitar Rp168 miliar, terjadi kenaikan 40,95%. Peningkatan ini terutama dikontribusi oleh kenaikan pada *fixed income* sebesar 75,39% dimana Bank mempertahankan kepemilikan surat berharga yang dimiliki dengan melakukan reinvestasi pada surat berharga yang jatuh tempo dan menambah kepemilikan reksadana.

## TREASURY

As a foreign exchange bank, the main service of Bank Sinarmas' treasury business is foreign exchange trading. The Bank's flagship foreign exchange products are plain vanilla, such as today (TOD), tomorrow (TOM), and SPOT. Other products include plain vanilla derivative services, such as forward and swap.

### Focus and Strategy 2024

The focus and strategy executed by Bank Sinarmas to improve the performance of the treasury segment in 2024 was to expand its base of customers who transact foreign exchange. This involved optimizing funds deposited in Bank Sinarmas by penetrating the money market and capital market.

### Business Performance 2024

Throughout the 2024 financial year, the Bank made Rp236 billion in fee-based income. It was an increase of 40.95% compared to Rp168 billion in 2023. The increase was mainly contributed by an increase in fixed income of 75.39%, where the Bank maintained its ownership of securities by reinvesting in maturing securities and increasing its mutual fund ownership.

## Kinerja Segmen *Treasury* berdasarkan Produk
**Treasury Segment Performance by Product**

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Keterangan | 2024 | 2023 | 2022 | Pertumbuhan (Penurunan) (%) Growth (Decrease) | Description |
|---|---|---|---|---|---|
| Treasury Sales | 54.698 | 42.574 | 31.273 | 28,48 | Treasury Sales |
| FX Trading | 40.511 | 38.978 | 38.724 | 3,93 | FX Trading |
| Fixed Income | 140.391 | 80.043 | 28.347 | 75,39 | Fixed Income |
| Syariah | - | 1.551 | 198 | - | Sharia |
| **Jumlah** | **235.600** | **167.146** | **98.542** | **40,95** | **Total** |

### Rencana Strategis 2025
Strategi Bank Sinarmas dalam meningkatkan segmen usaha *treasury* di tahun 2025 diungkapkan sebagai berikut.
1. Memperkuat sinergi antar unit bisnis untuk meningkatkan transaksi valas.
2. Mempersiapkan *e-channel* untuk menjangkau transaksi valuta asing, baik retail maupun korporasi.
3. Meningkatkan portofolio surat berharga.

### Strategic Plan for 2025
Bank Sinarmas' strategy in increasing the treasury business segment in 2025 is disclosed as follows.
1. Strengthening synergy between business units to increase foreign exchange transactions.
2. Preparing e-channels to reach foreign exchange transactions, both retail and corporate.
3. Increasing the portfolio of securities.

## EKSPOR-IMPOR
Bank Sinarmas menawarkan berbagai produk pembiayaan perdagangan Ekspor-Impor, seperti *Letter of Credit*, Surat Kredit Berdokumen Dalam Negeri (SKBDN), serta *Export Bills Collection* (DP & DA). Bank juga memiliki layanan pembiayaan *post export financing*, seperti diskonto dan negosiasi yang dapat digunakan sebagai modal kerja dengan rate yang kompetitif.

## EXPORT-IMPORT
Bank Sinarmas provides a range of Export-Import trade financing solutions, including Letters of Credit, Domestic Documented Credit Letters (SKBDN), and Export Bills Collection (DP and DA). The Bank also offers post-export financing services, such as discounts and negotiations, which can be utilized as working capital at competitive rates.

### Fokus dan Strategi 2024
Pada tahun 2024, Bank menawarkan fasilitas untuk mendukung kegiatan Ekspor-impor kepada Perusahaan yang sudah matang dengan kinerja yang baik dan berfokus kepada peningkatan transaksi negosiasi dan diskonto wesel ekspor.

### Focus and Strategy 2024
In 2024, the Bank provides facilities to support Export-Import activities for well-established companies with strong performance, with a focus on increasing export bill negotiation and discount transactions.

### Kinerja Usaha 2024
Pada tahun buku 2024, total *fee-based income* dari transaksi ekspor dan impor mencapai Rp6,7 miliar, lebih tinggi 2,33% dibandingkan tahun 2023 yang sebesar Rp6,5 miliar. Sedangkan dari pendapatan bunga, terjadi kenaikan 272,75% dibandingkan tahun sebelumnya, dari Rp707,8 juta di tahun 2023 menjadi Rp2,6 miliar pada tahun 2024.

Peningkatan yang terjadi pada transaksi ekspor-impor seiring dengan kenaikan kinerja dan aktivitas perusahaan debitur membaik pasca Covid-19, khusus dari segmen ekspor terdapat beberapa *new onboarding customer* serta perubahan strategi dan appetite Bank. Selain itu, terdapat peningkatan suku bunga acuan di tahun 2024 yang membantu peningkatan kinerja tersebut.

### Business Performance 2024
In the 2024 financial year, total fee-based income from export and import transactions reached Rp6.7 billion, marking a 2.33% increase compared to Rp6.5 billion in 2023. Meanwhile, interest income saw a significant growth of 272.75% year-on-year, rising from Rp707.8 million in 2023 to Rp2.6 billion in 2024.

The growth in export-import transactions was supported by the improved performance and activity of debtor companies following the Covid-19 pandemic, particularly within the export segment, which benefited from the onboarding of several new customers and adjustments to the Bank's strategy and risk appetite. Additionally, the increase in the benchmark interest rate in 2024 contributed to the strengthening of this performance.

### Rencana Strategis 2025
Strategi Bank Sinarmas dalam meningkatkan kinerja segmen usaha ekspor dan impor di tahun 2025 diuraikan sebagai berikut:

### Strategic Plan 2025
Bank Sinarmas' strategy to enhance the performance of its export and import business segments in 2025 is outlined as follows:

1. Untuk meningkatkan kinerja segmen usaha ekspor, Bank berupaya menumbuhkan pendapatan bunga melalui pembelian akseptasi (wesel ekspor) dari bank lain. Selain itu, Bank juga aktif dalam menjaring nasabah baru dengan mengoptimalkan jaringan cabang-cabang Bank Sinarmas untuk dapat meningkatkan pendapatan *fee-based*.
2. Secara selektif, Bank tetap menawarkan fasilitas pembiayaan perdagangan ekspor-impor dengan mengedepankan prinsip kehati-hatian kepada nasabah *existing* dengan kinerja yang baik dan mempertimbangkan *bundling* fasilitas modal kerja ataupun investasi bagi nasabah yang bergerak di bidang ekspor-impor.

## PERBANKAN SYARIAH

Pada tahun 2024, Unit Usaha Syariah PT. Bank Sinarmas Tbk. melakukan pemisahan dan berdiri menjadi PT Bank Nano Syariah. Bank Sinarmas menempatkan modal sebesar Rp510 Milyar atau 51% dari modal Bank Nano Syariah. Pemegang saham Bank Nano Syariah lainnya terdiri dari PT Sinar Mas Multiartha Tbk sebesar 25% dan PT Asuransi Sinar Mas sebesar 24%.

### Fokus dan Strategi 2024

Dalam rangka mempertahankan eksistensinya serta untuk menjamin kelangsungan operasional dan ekspansi usaha setelah dilakukan pemisahaan UUS menjadi BUS, Bank memerlukan perencanaan yang matang melalui penyusunan Rencana Bisnis yang realistis dan komprehensif mencakup berbagai aspek, dengan tetap mematuhi prinsip kehati-hatian serta responsif terhadap perubahan ekonomi dan moneter yang dapat mempengaruhi kondisi operasional, keuangan dan kesehatan Bank.

Fokus dan strategi Bank Nano Syariah pada tahun 2024, yaitu melalui penerapan "*The Effective Strategy*". Dimana berfokus pada segmen pasar UMK dan beroperasi secara efektif dan efisien didukung Sistem Teknologi Informasi (STI) yang handal serta SDI yang kompeten. "*The Effective Strategy*" diantaranya:

1. *Effective Products*, berfokus dalam meningkatkan penghimpunan dana pihak ketiga serta *fee-based income* (FBI).
2. *Effective Team & Networks*, berfokus pada penyaluran pembiayaan dan adanya program *linkage* dengan Lembaga Keuangan Syariah (LKS).
3. *Effective System & Operation*, berfokus dalam mengembangkan STI yang inovatif secara berkesinambungan

### Kinerja Usaha 2024

Total penghimpunan dana pada akhir 31 Desember 2024 tercatat sebesar Rp8.285 miliar atau 114,28% dari yang dianggarkan yang sebesar Rp7.250 miliar. Penghimpunan dana simpanan wadiah dan dana investasi non-profit sharing masing-masing sebesar 474,44% dan 99,42% terhadap anggaran. Tingginya pencapaian penghimpunan dana dibandingkan dengan pencapaian pembiayaan

1. To improve the performance of the export business segment, the Bank seeks to grow interest income through the purchase of acceptances (export bills) from other banks. In addition, the Bank is also active in attracting new customers by optimizing the Bank Sinarmas branch network to be able to increase fee-based income.
2. Selectively, the Bank continues to offer export-import trade financing facilities by prioritizing the principle of prudence to existing customers with good performance and considering bundling working capital or investment facilities for customers engaged in the export-import sector.

## SHARIAH BANKING

In 2024, the Sharia Business Unit of PT. Bank Sinarmas Tbk. will be separated and established as PT Bank Nano Syariah. Bank Sinarmas invests Rp510 billion or 51% of the capital of Bank Nano Syariah. Other shareholders of Bank Nano Syariah consist of PT Sinar Mas Multiartha Tbk with 25% and PT Asuransi Sinar Mas with 24%.

### Focus and Strategy 2024

In order to maintain its existence and to ensure the continuity of operations and business expansion after the separation of UUS into BUS, the Bank requires careful planning through the preparation of a realistic and comprehensive Business Plan covering various aspects, while still adhering to the principle of prudence and being responsive to economic and monetary changes that can affect the operational, financial and health conditions of the bank.

The focus and strategy of Bank Nano Syariah in 2024, namely through the implementation of "The Effective Strategy". Where it focuses on the MSME market segment and operates effectively and efficiently supported by a reliable Information Technology System (STI) and competent SDI. "The Effective Strategy" includes:

1. Effective Products, focuses on increasing third party fund collection and fee-based income (FBI).
2. Effective Team & Networks, focuses on financing distribution and linkage programs with Islamic Financial Institutions (LKS).
3. Effective System & Operation, focuses on developing innovative STI on an ongoing basis.

### Business Performance 2024

Total fundraising at the end of December 31, 2024 was recorded at Rp8,285 billion or 114.28% of the budgeted Rp7,250 billion. The collection of wadiah savings funds and non-profit sharing investment funds was 474.44% and 99.42% of the budget, respectively. The high achievement of fundraising compared to the achievement of financing caused the realization of the financing to deposit ratio (FDR)

menyebabkan realisasi financing to deposit ratio (FDR) pada Triwulan IV-2024 tercatat sebesar 41,84%, lebih rendah dibandingkan dengan anggaran sebesar 42,76%.

in Quarter IV-2024 to be recorded at 41.84%, lower than the budget of 42.76%.

### Kinerja Segmen Syariah (PT Bank Nano Syariah)
**Performance of Sharia Segment (PT Bank Nano Syariah)**

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Keterangan | 2024 | 2023 | 2022 | Pertumbuhan (Penurunan) (%) Growth (Decrease) | Description |
|---|---|---|---|---|---|
| Aset | 9.692.526 | - | - | - | Assets |
| Pembiayaan | 3.466.624 | - | - | - | Financing |
| Simpanan dan Dana Syirkah Temporer | 8.285.346 | - | - | - | Savings and Temporary Syirkah Funds |
| Laba Sebelum Pajak | 179.161 | - | - | - | Profit Before Tax |
| *Non-Performing Finance* (*Gross*) (%) | 0,20 | - | - | - | *Non-Performing Finance* (*Gross*) (%) |

Catatan | Note
Tahun 2023 dan 2022 bernilai nihil | Year 2023 and 2022 are nil



## KINERJA PROFITABILITAS

PT Bank Nano Syariah merupakan entitas usaha yang beroperasi sebagai Bank Umum Syariah (BUS) sejak 2 Januari 2024. Dengan demikian data pembanding tahun sebelumnya disajikan (YOY) nihil.

Pada 31 Desember 2024, laba bersih Bank Nano Syariah mencapai sebesar Rp161 miliar. Dimana laba bersih tersebut diperoleh dari pendapatan pengelolaan dana yang berasal dari instrument treasury maupun pembiayaan sebesar Rp755 miliar. Selain itu pendapatan atas usaha lainnya yang diperoleh oleh bank sebesar Rp106 miliar yang berasal dari pendapatan atas *bancassurance, fee* mudharabah muqayaddah, pendapatan admin maupun pendapatan dari pemulihan hapus buku. Untuk beban usaha bank terbesar dari beban gaji dan tunjangan dimana sebesar 52,96% dari beban usaha berasal dari beban tenaga kerja. Untuk tahun 2024 sendiri bank justru mengalami pemulihan CKPN. Hal ini disebabkan karena adanya pelunasan dari beberapa nasabah pembiayaan.

## PROFITABILITY PERFORMANCE

PT Bank Nano Syariah is a business entity that has been operating as a Sharia Commercial Bank (BUS) since January 2, 2024. Thus, the comparative data for the previous year (YOY) is nil.

As of December 31, 2024, Bank Nano Syariah's net profit reached Rp161 billion. Where the net profit was obtained from fund management income from treasury instruments and financing of Rp755 billion. In addition, income from other businesses obtained by the bank amounted to Rp106 billion which came from income from bancassurance, mudharabah muqayaddah fees, admin income and income from write-off recovery. For the bank's largest operating expenses from salary and allowance expenses where 52.96% of operating expenses came from labor expenses. For 2024 itself, the bank actually experienced CKPN recovery. This was due to the settlement of several financing customers.

### Profitabilitas per Segmen Usaha
**Profitability by Business Segment**

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian | 2024 | | | 2023 | | | Description |
|---|---|---|---|---|---|---|---|
| | Jumlah Pendapatan Total Revenues | Jumlah Beban Total Expenses | Pendapatan Segmen – Bersih Segment Revenue - Net | Jumlah Pendapatan Total Revenues | Jumlah Beban Total Expenses | Pendapatan Segmen – Bersih Segment Revenue - Net | |
| **Bank Umum Syariah** **Sharia Bank** | | | | | | | |
| Pemasaran dan Kredit | 545.455 | 354.904 | 190.551 | - | - | - | Marketing and Credit |
| Treasuri | 290.795 | 4.801 | 285.994 | - | - | - | Treasury |
| Ekspor-Impor | - | - | - | - | - | - | Export-Import |

Catatan | Note:
Tahun 2023 bernilai nihil | Year 2023 is nil

# TINJAUAN KINERJA KEUANGAN
## Financial Performance Overview

Pembahasan kinerja keuangan komprehensif di bawah ini mengacu pada Laporan Keuangan Konsolidasian PT. Bank Sinarmas Tbk. (“Bank Sinarmas,” “Bank”) yang berakhir pada tanggal 31 Desember 2024 dan telah diaudit oleh Kantor Akuntan Publik Mirawati Sensi Idris dengan opini audit Wajar Tanpa Modifikasian.

The following discussion of the comprehensive financial performance refers to the Consolidated Financial Statements of PT. Bank Sinarmas Tbk. (“Bank Sinarmas,” “the Bank”), which ended on December 31, 2024 and were audited by Public Accounting Firm Mirawati Sensi Idris with an unmodified audit opinion.

### ASET

Hingga akhir tahun buku 2024, Bank membukukan aset senilai Rp55.624 miliar, lebih tinggi 5,68% dibandingkan posisi tahun 2023 yang sebesar Rp52.635 miliar. Sekitar 83,06% dari total aset merupakan aset produktif yang tercatat tumbuh 8,20% secara tahunan. Meningkatnya penyaluran pada aset produktif selaras dengan meningkatnya ketersediaan dana yang bersumber dari pertumbuhan portofolio dana pihak ketiga (DPK).

### ASSETS

Bank reported assets of Rp55,624 billion as of the end of the year 2024, 5.68% higher than the Rp52,635 billion recorded in 2023. Around 83.06% of total assets are productive assets which recorded an annual growth of 8.20%. The increase in distribution of productive assets is in line with the increasing availability of funds sourced from the growth of the third party fund portfolio (DPK).

#### Perkembangan Kinerja Aset
**Assets Performance Development**

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease) | |
|---|---|---|---|---|
| | | | Nominal | % |
| Kas dan Setara Kas<br>Cash and Cash Equivalents | 509.207 | 388.102 | 121.105 | 31,20 |
| Giro pada Bank Indonesia<br>Demand Deposits with Bank Indonesia | 5.706.437 | 6.022.812 | (316.375) | (5,25) |
| Giro pada Bank Lain – Bersih<br>Demand Deposits with Other Banks – Net | 2.020.989 | 2.655.935 | (634.946) | (23,91) |
| Penempatan pada Bank Indonesia dan Bank Lain – Bersih<br>Placements with Bank Indonesia and Other Banks - Net | 8.725.976 | 6.263.377 | 2.462.599 | 39,32 |
| Efek-efek – Bersih<br>Securities – Net | 22.123.030 | 18.131.802 | 3.991.228 | 22,01 |
| Efek yang Dibeli dengan Janji Jual Kembali – Bersih<br>Securities Purchased under Agreements to Resell - Net | 192.215 | - | 192.215 | 100,00 |
| Kredit yang Diberikan dan Piutang/Pembiayaan Syariah – Bersih<br>Loans and Sharia Receivables/Financing – Net | 12.806.287 | 15.185.200 | (2.378.913) | (15,67) |
| Tagihan Akseptasi – Bersih<br>Acceptances Receivable - Net | 38.129 | 78.304 | (40.175) | (51,31) |
| Pendapatan yang Masih Akan Diterima<br>Accrued Income | 405.091 | 326.751 | 78.340 | 23,98 |
| Biaya Dibayar di Muka<br>Prepaid Expenses | 611.977 | 921.948 | (309.971) | (33,62) |
| Aset Tetap – Bersih<br>Property and Equipment - Net | 1.555.763 | 1.606.075 | (50.312) | (3,13) |
| Aset Ijarah – Bersih<br>Ijarah Assets - Net | 292.544 | 384.218 | (91.674) | (23,86) |
| Aset Pajak Tangguhan – Bersih<br>Deferred Tax Assets - Net | 261.361 | 214.568 | 46.793 | 21,81 |
| Aset Lain-lain – Bersih<br>Other Assets - Net | 375.427 | 455.904 | (80.477) | (17,65) |
| **Jumlah**<br>**Total** | **55.624.433** | **52.634.996** | **2.989.437** | **5,68** |

## Aset Produktif

Untuk mengoptimalkan pendapatan bunga yang diterima, Bank mengutamakan penyaluran dana simpanan pada kredit dan pembiayaan dibandingkan aset produktif lain. Pengalokasian dana pada surat-surat berharga mulai meningkat saat terjadi pelunasan pada kredit dan pembiayaan korporasi. Selain surat berharga, Bank menempatkan dana pada aset produktif lain sesuai dengan tingkat risiko dan yield yang dapat diterima oleh Bank.

Pada tahun 2024, total aset produktif Bank sekitar Rp46.199 miliar. Dibandingkan tahun 2023 yang Rp42.699 miliar, meningkat 8,20%. Peningkatan ini di kontribusi oleh peningkatan pada surat berharga sebesar 22,01% dan penempatan pada Bank Indonesia dan Bank Lain sebesar 39,32%

## Earning Assets

To optimize the interest income received, the Bank prioritizes the distribution of savings funds on credit and financing compared to other productive assets. The allocation of funds to securities began to increase when there was a repayment on corporate credit and financing. In addition to securities, the Bank places funds in other productive assets according to the level of risk and yield acceptable to the Bank.

Bank total earning assets in 2024 were around Rp46,199 billion, up 8.20% from Rp42,699 billion in 2023. This increase was contributed by an increase in securities of 22.01% and placements in Bank Indonesia and other banks of 39.32%.

### Rincian Aset Produktif
### Details of Earning Assets

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease) | |
|---|---|---|---|---|
| | | | Nominal | % |
| Giro pada Bank Lain – Bersih<br>Demand Deposits with Other Banks - Net | 2.020.989 | 2.655.935 | (634.946) | (23,91) |
| Penempatan pada Bank Indonesia dan Bank Lain – Bersih<br>Placements with Bank Indonesia and Other Banks - Net | 8.725.976 | 6.263.377 | 2.462.599 | 39,32 |
| Efek-efek – Bersih<br>Securities - Net | 22.123.030 | 18.131.802 | 3.991.228 | 22,01 |
| Efek yang Dibeli dengan Janji Jual Kembali – Bersih<br>Securities Purchased under Agreements to Resell - Net | 192.215 | - | 192.215 | 100,00 |
| Kredit yang Diberikan dan Piutang/Pembiayaan Syariah – Bersih<br>Loans and Sharia Receivables/Financing - Net | 12.806.287 | 15.185.200 | (2.378.913) | (15,67) |
| Tagihan Akseptasi – Bersih<br>Acceptances Receivable - Net | 38.129 | 78.304 | (40.175) | (51,31) |
| Aset Ijarah – Bersih<br>Ijarah Assets - Net | 292.544 | 384.218 | (91.674) | (23,86) |
| **Jumlah<br>Total** | **46.199.170** | **42.698.836** | **3.500.334** | **8,20** |

## Kas dan Setara Kas

Komponen kas dan setara kas Bank antara lain terbagi menjadi kas utama, kas anjungan tunai mandiri (ATM), dan kas kecil yang selalu diupayakan berada pada level optimal guna mendukung aktivitas investasi maupun operasional bisnis Bank. Pada tahun 2024, total kas dan setara kas Bank sebesar Rp509 miliar, naik 31,20% dibandingkan akhir tahun 2023 yang Rp388 miliar.

## Cash and Cash Equivalents

The Bank's cash and cash equivalents are divided into three categories: main cash, cash advances (ATM), and petty cash, which are constantly monitored to ensure that they are at an optimal level to support the Bank's investment and business operations. In 2024, the Bank's total cash and cash equivalents were Rp509 billion, up 31.20% from Rp388 billion at the end of 2023.

## Giro pada Bank Indonesia

Jumlah giro pada Bank Indonesia pada akhir tahun 2024 sebesar Rp5.706 miliar. Dibandingkan tahun 2023 yang sekitar Rp6.023 miliar, terjadi penurunan 5,25%. Walaupun total DPK meningkat dari tahun 2023, total giro pada Bank Indonesia berkurang karena Bank mendapatkan insentif berupa pelonggaran atas kewajiban pemenuhan GWM sebesar 2,8% dari pemenuhan Kebijakan Likuiditas Makroprudensial (KLM). Insentif yang diterima di tahun 2024 lebih tinggi dari Desember 2023 yang sebesar 1%.Insentif ini diberikan kepada Bank yang menyalurkan kredit atau pembiayaan kepada sektor-sektor prioritas yang ditetapkan Bank Indonesia.

## Demand Deposits with Bank Indonesia

Total demand deposits with Bank Indonesia at the end of 2024 amounted to Rp5,706 billion, a decrease of 5.25% compared to Rp6,023 billion in 2023. Although total deposits increased from 2023, total current accounts with Bank Indonesia decreased as the Bank received an incentive in the form of an easing of the reserve requirement of 2.8% from the fulfillment of the Macroprudential Liquidity Policy (KLM). The incentive received in 2024 is higher than December 2023 which amounted to 1%. This incentive was given to banks that funneld credit or financing to priority sectors determined by Bank Indonesia.

## Giro pada Bank Indonesia berdasarkan Mata Uang
**Demand Deposits with Bank Indonesia by Currency**

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease) | |
|---|---|---|---|---|
| | | | Nominal | % |
| Rupiah | 5.032.452 | 5.602.464 | (570.012) | (10,17) |
| Mata Uang Asing<br>Foreign Currency | 673.985 | 420.348 | 253.637 | 60,34 |
| **Jumlah**<br>**Total** | **5.706.437** | **6.022.812** | **(316.375)** | **(5,25)** |

## Giro pada Bank Lain – Bersih
Giro Bank Sinarmas yang ditempatkan di bank lain bersih hingga akhir 2024 mencapai Rp2.021 miliar, lebih rendah rendah 23,91% dibandingkan tahun 2023 yang sebesar Rp2.656 miliar. Pergerakan ini mengikuti pergerakan kebutuhan operasional serta optimalisasi likuiditas yang dibutuhkan oleh Perseroan.

## Demand Deposits with Other Banks - Net
Bank Sinarmas' demand deposits placed in other banks - net until the end of 2024 reached Rp2,021 billion, 23.91% lower than in 2023 which amounted to Rp2,656 billion. This movement follows the movement of The Company's operational needs and liquidity optimization needs.

## Giro pada Bank Lain berdasarkan Mata Uang
**Demand Deposits with Other Banks by Currency**

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease) | |
|---|---|---|---|---|
| | | | Nominal | % |
| Rupiah | 19.706 | 104.825 | (85.119) | (81,20) |
| Mata Uang Asing<br>Foreign Exchange | 2.001.848 | 2.552.042 | (550.194) | (21,56) |
| **Jumlah**<br>**Total** | **2.021.554** | **2.656.867** | **(635.313)** | **(23,91)** |
| Cadangan Kerugian Penurunan Nilai<br>Allowance for Impairment Losses | (565) | (932) | 367 | (39,38) |
| **Jumlah Bersih**<br>**Net Total** | **2.020.989** | **2.655.935** | **(634.946)** | **(23,91)** |

## Penempatan pada Bank Indonesia dan Bank Lain – Bersih
Penempatan dana Bank bersih di bank lain dan Bank Indonesia pada tahun 2024 tercatat Rp8.726 miliar, naik 39,32% dibandingkan tahun 2023 yang sebesar Rp6.263 miliar. Peningkatan ini karena Bank melakukan diversifikasi penempatan ke Antar Bank dengan *rate* yang lebih baik.

## Placements with Bank Indonesia and Other Banks - Net
The Bank's net placement of funds in other banks and Bank Indonesia in 2024 was recorded at Rp8,726 billion, an increase of 39.32% compared to 2023, which amounted to Rp6,263 billion. This increase was because the Bank diversified its placements to Interbank with better rates.

## Rincian Penempatan pada Bank Indonesia dan Bank Lain
**Details of Placements with Bank Indonesia and Other Banks**

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease) | |
|---|---|---|---|---|
| | | | Nominal | % |
| **Rupiah** | | | | |
| Deposit Facility | 2.294.000 | 1.650.000 | 644.000 | 39,03 |
| *Call Money* | 2.440.089 | - | 2.440.089 | 100,00 |
| **Jumlah Rupiah**<br>**Total Rupiah** | **4.734.089** | **1.650.000** | **3.084.089** | **186,91** |
| **Mata Uang Asing**<br>Foreign Currency | | | | |
| *Term Deposit* | 3.702.316 | 4.467.117 | (764.801) | (17,12) |
| *Call Money* | 289.710 | 146.272 | 143.438 | 98,06 |
| **Jumlah Mata Uang Asing**<br>**Total Foreign Currency** | **3.992.026** | **4.613.389** | **(621.363)** | **(13,47)** |
| **Jumlah**<br>**Total** | **8.726.115** | **6.263.389** | **2.462.726** | **39,32** |
| Cadangan Kerugian Penurunan Nilai<br>Allowance for Impairment Losses | (139) | (12) | (127) | 1.058,33 |
| **Jumlah Bersih**<br>**Net Total** | **8.725.976** | **6.263.377** | **2.462.599** | **39,32** |

## Efek-efek – Bersih

Efek-efek merupakan salah satu alternatif penempatan dana yang dilakukan Bank selain pada pos pinjaman yang diberikan. Per 31 Desember 2024, jumlah efek-efek yang dimiliki Bank berjumlah Rp22.123 miliar, mengalami kenaikan 22,01% dibandingkan tahun 2023 yang sebesar Rp18.132 miliar.

Peningkatan ini disebabkan oleh adanya penempatan SUKBI pada Bank Nano Syariah pada akhir tahun 2024 sebesar Rp2.850 miliar serta adanya peningkatan penempatan *Sovereign Paper* (SRBI/Sekuritas Rupiah Bank Indonesia) sebesar Rp1.768 miliar.

## Securities - Net

Securities are one of the alternative placements of funds made by the Bank in addition to loans. As of December 31, 2024, the Bank's securities amounted to Rp22,123 billion, an increase of 22.01% compared to Rp18,132 billion in 2023.

This increase was due to the placement of SUKBI at Bank Nano Syariah at the end of 2024 amounting to Rp2,850 billion and an increase in the placement of Sovereign Paper (SRBI/Bank Indonesia Rupiah Securities) of Rp1,768 billion.

### Rincian Efek-efek
**Details of Securities**

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease) | |
|---|---|---|---|---|
| | | | Nominal | % |
| Rupiah | 21.356.360 | 17.321.761 | 4.034.599 | 23,29 |
| Mata Uang Asing<br>Foreign Currency | 766.915 | 810.310 | (43.395) | (5,36) |
| **Jumlah<br>Total** | **22.123.275** | **18.132.071** | **3.991.204** | **22,01** |
| Cadangan Kerugian Penurunan Nilai<br>Allowance for Impairment Losses | (245) | (269) | (24) | 8,92 |
| **Jumlah Bersih<br>Net Total** | **22.123.030** | **18.131.802** | **3.991.228** | **22,01** |

## Efek yang Dibeli dengan Janji Jual Kembali Bersih

Efek yang dibeli dengan janji jual kembali merupakan efek-efek dengan jangka waktu 7 hari. Pada akhir tahun 2024 jumlah efek yang dibeli dengan janji jual kembali bersih yang tercatat di buku Bank adalah sebesar Rp192 milliar, sedangkan pada 31 Desember 2023, nilai pada pos tersebut adalah nihil. Namun jika dibandingkan dari rata-rata penempatan sepanjang tahun, maka terjadi penurunan dari Rp683 miliar menjadi Rp170 miliar.

## Securities Purchased under Net Resale Agreements

Securities purchased under resale agreements are instruments with a maturity period of seven days. As of the end of 2024, the Bank recorded a balance of Rp192 billion for these securities, compared to nil as of December 31, 2023. However, when measured against the average placements throughout the year, there was a notable decline—from Rp683 billion in the previous year to Rp170 billion in 2024.

### Rincian Efek yang Dibeli dengan Janji Jual Kembali
**Details of Securities Purchased under Agreements to Resale**

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease) | |
|---|---|---|---|---|
| | | | Nominal | % |
| Efek yang dibeli dengan janji jual kembali bersih– Pihak Ketiga<br>Securities purchased with net resale agreements - Third parties | 193.748 | - | 192.215 | 100,00% |
| Bunga diterima dimuka yang belum diamortisasi<br>Unamortized interest received in advance | (1.522) | - | -1.522 | 100,00% |
| **Jumlah Bersih<br>Net Total** | **192.215** | **-** | **192.215** | **100,00%** |

## Biaya Dibayar di Muka

Biaya dibayar di muka yang dimiliki Bank tahun 2024 sebesar Rp612 miliar, mengalami penurunan 33,62% dibandingkan tahun 2023 yang mencapai Rp922 miliar. Penurunan ini disebabkan dari menurunnya biaya dibayar dimuka asuransi sebesar 52,00% atau Rp359 miliar.

## Prepaid Expenses

In 2024, the Bank's prepaid expenses amounted to Rp612 billion, a decrease of 33.62% compared to 2023, which reached Rp922 billion. This decline was due to a decline in the insurance prepaid expenses by 52.00% or Rp359 billion.

## Rincian Biaya Dibayar di Muka
**Details of Prepaid Expenses**

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease) | |
|---|---|---|---|---|
| | | | Nominal | % |
| Asuransi<br>Insurance | 331.165 | 689.983 | (358.818) | (52,00) |
| Pemeliharaan Perangkat Lunak dan Keras<br>Software and Hardware Maintenance | 116.482 | 102.252 | 14.230 | 13,92 |
| Promosi dan Pengembangan Usaha<br>Promotion and Operating Development | 67.490 | 54.443 | 13.047 | 23,96 |
| Sewa<br>Rental | 22.820 | 19.912 | 2.908 | 14,60 |
| Program Kepemilikan Kendaraan Karyawan<br>Vehicle Ownership Program | 20.993 | 2.402 | 18.591 | 773,98 |
| Jasa Produksi<br>Production Services | 17.034 | - | 17.034 | 100,00 |
| Renovasi Cabang Baru<br>New Branches Renovation Costs | 14.859 | 16.282 | (1.423) | (8,74) |
| Lain-lain<br>Others | 21.134 | 36.674 | (15.540) | (42,37) |
| **Jumlah**<br>**Total** | **611.977** | **921.948** | **(309.971)** | **(33,62)** |

## Aset Tetap Bersih
Jumlah aset tetap bersih Bank tahun 2024 sebesar Rp1.556 miliar, lebih rendah 3,13% dibandingkan tahun 2023 yang sebesar Rp1.606 miliar. Hal tersebut disebabkan pada tahun 2024 Bank tidak banyak melakukan penambahan aset tetap sehingga nilai buku aset tetap bersih Bank menurun karena adanya pencatatan akumulasi aset dari tahun sebelumnya.

## Net Fixed Assets
The Bank's net fixed assets in 2024 amounted to Rp1,556 billion, 3.13% lower than in 2023, which amounted to Rp1,606 billion. This is because in 2024 the Bank did not add many fixed assets so that the book value of the Bank's net fixed assets decreased due to the recording of accumulated assets from the previous year.

## Aset Lain-lain – Bersih
Bank mencatat jumlah aset lain-lain bersih pada tahun 2024 sebesar Rp375 miliar, turun 17,65% dibandingkan tahun 2023 yang sebesar Rp456 miliar. Penurunan tersebut dikontribusi oleh menurunnya pos uang muka pembelian aset dan tagihan sehubungan dengan ATM bersama yang masing-masing sebesar 26,14% dan 33,02%.

## Other Assets - Net
In 2024, the Bank recorded a total other assets - net of Rp375 billion, a decrease of 17.65% compared to Rp456 billion in 2023. The decline was contributed by a decrease in down payments for asset purchases and bills related to ATM Bersama, which were 26.14% and 33.02% respectively.

## Liabilitas
Jumlah liabilitas Bank pada akhir tahun 2024 mengalami kenaikan 6,11% dibandingkan tahun 2023, dari Rp37.789 miliar menjadi Rp40.099. Peningkatan tersebut disebabkan simpanan masyarakat bertumbuh 7,84% atau naik sebesar Rp2.755 miliar.

## Liabilities
The Bank's total liabilities in 2024 increased by 6.11% compared to 2023, from Rp37,789 billion to Rp40,099 billion. The increase was driven by a 7.84% growth in public deposits, equivalent to an increase of Rp2.755 billion.

## Rincian Liabilitas
**Details of Liabilities**

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease) | |
|---|---|---|---|---|
| | | | Nominal | % |
| Liabilitas Segera<br>Liabilities Immediately Payable | 178.778 | 167.982 | 10.796 | 6,43 |
| Simpanan<br>Deposits | 37.897.415 | 35.142.585 | 2.754.830 | 7,84 |
| Simpanan dari Bank Lain<br>Deposits from Other Banks | 66.760 | 327.445 | (260.685) | (79,61) |
| Efek yang Dijual dengan Janji Dibeli Kembali<br>Securities Sold under Agreements to Repurchase | 879.455 | 1.051.717 | (172.262) | (16,38) |

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease) | |
|---|---|---|---|---|
| | | | Nominal | % |
| Utang Pajak<br>Taxes Payable | 52.719 | 52.572 | 147 | 0,28 |
| Liabilitas Akseptasi<br>Acceptances Payable | 38.160 | 79.880 | (41.720) | (52,23) |
| Beban yang Masih Harus Dibayar<br>Accrued Expenses | 44.216 | 43.816 | 400 | 0,91 |
| Liabilitas Imbalan Kerja Jangka Panjang<br>Long-term Employee Benefits Liability | 44.749 | 35.426 | 9.323 | 26,32 |
| Obligasi Subordinasi – Bersih<br>Subordinated Bonds - Net | 497.505 | 496.512 | 993 | 0,20 |
| Liabilitas Lain-lain<br>Other Liabilities | 399.533 | 390.973 | 8.560 | 2,19 |
| **Jumlah<br>Total** | **40.099.290** | **37.788.908** | **2.310.382** | **6,11** |



## Liabilitas Segera

Liabilitas segera Bank pada tahun 2024 sebesar Rp179 miliar, meningkat 6,43% dibandingkan tahun 2023 yang sebesar Rp168 miliar. Kenaikan ini dari naiknya beban akrual sebesar 32,54% dan liabilitas jasa produksi di akhir tahun 2024 sebesar Rp24 milar.

## Liabilities Immediately Payable

In 2024, the Bank's liabilities immediately payable reached Rp179 billion, an increase of 6.43% compared to 2023, which amounted to Rp165 billion. This increase was due to an increase in accrual expenses of 32.54% and production service liabilities of Rp24 billion at the end of 2024.

### Rincian Liabilitas Segera
### Details of Liabilities Immediately Payable

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease) | |
|---|---|---|---|---|
| | | | Nominal | % |
| Beban Akrual<br>Accrued Expenses | 79.548 | 60.018 | 19.530 | 32,54 |
| Liabilitas sehubungan dengan Jaringan ATM<br>Payable related to ATM Network | 27.083 | 61.935 | (34.852) | (56,27) |
| Kiriman Uang<br>Transfer Checks for Collection and Clearing | 24.540 | 19.669 | 4.871 | 24,76 |
| Liabilitas Jasa Produksi<br>Production Service Payable | 23.770 | - | 23.770 | 100,00 |
| Liabilitas Pihak Ketiga<br>Third-Party Payable | 5.842 | - | 5.842 | 100,00 |
| Liabilitas Pembayaran *Online*<br>Online Payment Payable | 4.546 | 8.644 | (4.098) | (47,41) |
| Titipan Uang Elektronik<br>Electronic Money Deposit | 3.708 | 2.881 | 827 | 28,71 |
| Program Loyalitas Pelanggan<br>Customer Loyalty Program | 2.981 | 2.981 | - | 0,00 |
| Liabilitas Administrasi Kredit<br>Loans Administration Payable | 2.587 | 6.062 | (3.475) | (57,32) |
| Lain-lain<br>Others | 4.173 | 5.792 | (1.619) | (27,95) |
| **Jumlah<br>Total** | **178.778** | **167.982** | **10.796** | **6,43** |

## Simpanan

Jumlah simpanan masyarakat yang dikelola oleh Bank hingga akhir tahun 2024 mencapai Rp37.897 miliar, mengalami kenaikan 4,77% apabila dibandingkan dengan tahun 2023 yang sebesar Rp35.143 miliar. Kenaikan simpanan didorong oleh giro dan tabungan yang meningkat masing-masing naik

## Deposits

Total public deposits managed by the Bank until the end of 2024 reached Rp37,897 billion, experienci an increase of 4.77% compared to 2023 which was Rp35,143 billion. The increase in deposits was due to an increase in demand deposits and savings by 17.93% and 6.24% respectively, while

sebesar 17,93% dan 6,24%, sedangkan deposito berjangka mengalami penurunan sebesar 5,67%. Meningkatnya giro dan tabungan berpengaruh terhadap meningkatnya rasio CASA terhadap total simpanan menjadi sebesar 75,88% dari tahun sebelumnya sebesar 72,42%.

time deposits decreased by 5.67%. The increase in current and savings accounts contributed to the rise in the Bank's CASA ratio to 75.88%, up from 72.42% in the previous year.

### Simpanan Masyarakat berdasarkan Jenis
**Public Deposits by Type**

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease) | |
|---|---|---|---|---|
| | | | Nominal | % |
| Giro<br>Demand Deposits | 17.314.175 | 14.682.168 | 2.632.007 | 17,93 |
| Tabungan<br>Savings | 11.440.897 | 10.768.878 | 672.019 | 6,24 |
| Deposito Berjangka<br>Time Deposits | 9.142.343 | 9.691.539 | (549.196) | (5,67) |
| **Jumlah**<br>**Total** | **37.897.415** | **35.142.585** | **2.754.830** | **7,84** |
| **Jumlah CASA (%)**<br>**Total CASA (%)** | **75,88** | **72,42** | **3,45** | **4,77** |

### Simpanan dari Bank Lain
Simpanan dari bank lain pada akhir 2024 sebesar Rp67 miliar, lebih rendah 79,61% dibandingkan tahun 2023 yang mencapai Rp327 miliar. Kontribusi utama penurunan simpanan dari bank lain dikarenakan Bank mengurangi interbank taking sehubungan dengan likuiditas yang memadai.

### Deposits from Other Banks
Deposits from other banks at the end of 2024 amounted to Rp67 billion, 79.61% lower than in 2023, which amounted to Rp327 billion. The main contribution to the decline in deposits from other banks due to the Bank reducing in interbank borrowing as a result of having sufficient liquidity.

### Simpanan dari Bank Lain Berdasarkan Jenis
**Deposits from Other Banks by Type**

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease) | |
|---|---|---|---|---|
| | | | Nominal | % |
| Giro<br>Demand Deposits | 45.086 | 41.271 | 3.815 | 9,24 |
| Deposito Berjangka<br>Time Deposits | 21.674 | 11.174 | 10.500 | 93,97 |
| *Call Money* | - | 275.000 | (275.000) | (100,00) |
| **Jumlah**<br>**Total** | **66.760** | **327.445** | **(260.685)** | **(79,61)** |

### Efek-efek yang Dijual dengan Janji Beli Kembali
Pada akhir tahun 2024, Bank melakukan transaksi efek-efek yang dijual dengan janji beli kembali – pihak ketiga dengan bank lain senilai Rp879 miliar, lebih rendah 16,38% dibandingkan tahun 2023 yang sebesar Rp1.052 miliar. Namun jika dibandingkan dari rata-rata sepanjang tahun, maka terjadi kenaikan dari Rp88 miliar menjadi Rp583 miliar. Tujuan dari transaksi ini adalah untuk menjaga likuiditas.

### Securities Sold under Agreements to Repurchase
At the end of 2024, the Bank conducted transactions with other banks involving securities sold under agreements to repurchase from third parties totaling Rp879 billion, a 16.38% decrease from Rp1,052 billion in 2023. However, when compared to the average throughout the year, there was an increase from Rp88 billion to Rp583 billion. This transaction was intended to maintain liquidity near the end of the year was intended to maintain liquidity.

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease) | |
|---|---|---|---|---|
| | | | Nominal | % |
| Efek yang Dijual dengan Janji Beli Kembali<br>Securities Sold under Agreements to Repurchase | 879.455 | 1.051.717 | (172.262) | (16,38) |

## Utang Pajak

Jumlah utang pajak Bank pada tahun 2024 sebesar Rp53 miliar, cenderung stabil apabila dibandingkan dengan tahun 2023 yang sebesar Rp52,6 miliar.

## Taxes Payable

In 2024, the Bank's tax payable amounted to Rp53 billion, tending to be stable when compared to 2023 which was Rp52.6 billion.

### Rincian Utang Pajak
**Details of Taxes Payable**

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease) | |
|---|---|---|---|---|
| | | | Nominal | % |
| Pajak Kini<br>Current Tax | 5.401 | 22.677 | (17.276) | (76,18) |
| Pajak Penghasilan<br>Income Tax | | | | |
| Pasal 4<br>Article 4 | 19.873 | 14.446 | 5.427 | 37,57 |
| Pasal 21<br>Article 21 | 19.419 | 5.813 | 13.606 | 234,06 |
| Pasal 23 dan 26<br>Article 23 and 26 | 2.169 | 2.244 | (75) | (3,34) |
| Pasal 25<br>Article 25 | 3.933 | - | 3.933 | 100,00 |
| Pajak Pertambahan Nilai<br>Value Added Tax | 1.924 | 7.392 | (5.468) | (73,97) |
| **Jumlah<br>Total** | **52.719** | **52.572** | **147** | **0,28** |

## Liabilitas Akseptasi

Bank mencatat liabilitas akseptasi sebesar Rp38 miliar, mengalami penurunan 52,23% dibandingkan tahun 2023 yang sebesar Rp80 miliar. Penurunan terjadi pada liabilitas akseptasi dalam mata uang rupiah dan asing yang masing-masing turun sebesar 75,23% dan 38,54%.

## Acceptance Payable

The Bank recorded acceptance payable of Rp38 billion, experiencing a decrease of 52.23% compared to 2023 which was Rp80 billion. The decrease occurred in acceptance liabilities in rupiah and foreign currencies which decreased by 75.23% and 38.54% respectively.

### Liabilitas Akseptasi berdasarkan Mata Uang
**Acceptances Payable by Currency**

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease) | |
|---|---|---|---|---|
| | | | Nominal | % |
| Rupiah | 7.382 | 29.798 | (22.416) | (75,23) |
| Mata Uang Asing<br>Foreign Currency | 30.778 | 50.082 | (19.304) | (38,54) |
| **Jumlah<br>Total** | **38.160** | **79.880** | **(41.720)** | **(52,23)** |

## Liabilitas Imbalan Kerja Jangka Panjang

Bank membukukan liabilitas imbalan kerja jangka panjang di akhir tahun 2024 sebesar Rp45 miliar, mengalami kenaikan 26,32% dibandingkan tahun 2023 yang sebesar Rp35 miliar. Peningkatan ini seiring dengan kenaikan gaji karyawan.

## Long-term Employee Benefits Liabilities

The Bank recorded long-term employee benefit liabilities at the end of 2024 amounting to Rp45 billion, an increase of 26.32% compared to 2023, which amounted to Rp35 billion. This increase is in line with the increase in salaries.

## Rincian Liabilitas Imbalan Kerja Jangka Panjang
**Details of Long-term Employee Benefits Liabilities**

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease) | |
|---|---|---|---|---|
| | | | Nominal | % |
| Liabilitas Imbalan Kerja Jangka Panjang Awal Tahun<br>Long-term Employee Benefit Liabilities at the Beginning of the Year | 35.426 | 36.141 | (715) | (1,98) |
| Beban (Pendapatan) Imbalan Jangka Panjang Tahun Berjalan<br>Long-Term Employee Benefits Liability Expense (Income) during the Year | 26.752 | 16.301 | 10.451 | 64,11 |
| Kerugian Komprehensif Lain<br>Other Comprehensive Losses | 1.491 | 2.984 | (1.493) | (50,03) |
| Kelebihan Pembayaran Imbalan Kerja<br>Excess in Benefit Payment | (10.808) | - | (10.808) | 100,00 |
| Iuran Perusahaan<br>Company Contribution | (8.112) | (20.000) | 11.888 | (59,44) |
| **Liabilitas Imbalan Kerja Jangka Panjang Akhir Tahun**<br>**Long-term Employee Benefit Liabilities at End of the Year** | **44.749** | **35.426** | **9.323** | **26,32** |

## Obligasi Subordinasi

Pada tanggal 29 Juni 2022, Perusahaan menerbitkan Obligasi Subordinasi Berkelanjutan sebesar Rp500 miliar dengan jangka waktu 5 (lima) tahun yang akan jatuh tempo pada tanggal 8 Juli 2027. Pada akhir tahun 2024, nilai obligasi subordinasi bersih adalah sebesar Rp498 miliar. Dana yang diperoleh dari hasil Penawaran Umum Berkelanjutan Obligasi Subordinasi Berkelanjutan setelah dikurangi dengan biaya-biaya emisi, seluruhnya dipergunakan untuk memperkuat permodalan dalam rangka mendukung rencana penyaluran kredit dengan tenor yang lebih panjang.

## Subordinated Bonds

On June 29, 2022, the Company issued Sustainable Subordinated Bonds in the amount of Rp500 billion with a maturity period of five (5) years, which will mature on July 8, 2027. As of the end of 2024, the net value of the subordinated bonds amounted to Rp498 billion. The funds raised from the Public Offering of the Sustainable Subordinated Bonds, after deducting issuance costs, were entirely used to strengthen the Company's capital structure in order to support plans for extending credit with longer tenors.

## Rincian Obligasi Subordinasi – Bersih
**Details of Subordinated Bonds - Net**

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease) | |
|---|---|---|---|---|
| | | | Nominal | % |
| Obligasi Subordinasi Bank Sinarmas Tahap I Tahun 2022<br>Subordinated Bonds of Bank Sinarmas Phase I of 2022 | 500.000 | 500.000 | - | 0,00 |
| Diskonto yang Belum Diamortisasi<br>Unamortized Discount | (2.495) | (3.488) | (993) | 28,47 |
| **Jumlah Bersih**<br>**Net Total** | **497.505** | **496.512** | **993** | **0,20** |

## Liabilitas Lain-lain

Pada akhir tahun 2024, jumlah liabilitas lain-lain sebesar Rp400 miliar, lebih tinggi 2,19% dibandingkan tahun 2023 yang sebesar Rp391 miliar. Peningkatan ini berasal dari setoran jaminan yang meningkat sebesar 12,27% dan pada akhir tahun 2024 terdapat penilaian pajak penghasilan sebesar Rp20 miliar.

## Other Liabilities

At the end of 2024, the Bank's total other liabilities reached Rp400 billion, 2.19% higher than in 2023, which amounted to Rp391 billion. This increase was primarily attributable to a rise in guarantee deposits, which grew by 12.27% and at the end of 2024 there was an income tax assessment of Rp20 billion.

## Rincian Liabilitas Lain-lain
### Details of Other Liabilities

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease) | |
|---|---|---|---|---|
| | | | Nominal | % |
| Setoran Jaminan<br>Security Deposits | 176.743 | 157.425 | 19.318 | 12,27 |
| Liabilitas Sewa<br>Lease Liabilities | 129.916 | 133.368 | (3.452) | (2,59) |
| Pendapatan yang Ditangguhkan<br>Deferred Income | 24.124 | 22.945 | 1.179 | 5,14 |
| Penilaian Pajak Penghasilan<br>Income Tax Assessment | 19.746 | - | 19.746 | 100,00 |
| Liabilitas terkait Asuransi Kredit<br>Liability Related to Insurance Credit | 13.580 | 23.005 | (9.425) | (40,97) |
| Estimasi Kerugian Komitmen dan Kontinjensi<br>Estimated Losses on Commitment and Contingencies | 8.803 | 7.640 | 1.163 | 15,22 |
| Liabilitas sehubungan dengan Pinjaman<br>Liabilities in connection with Loans | 2.381 | 4.028 | (1.647) | (40,89) |
| Liabilitas Derivatif<br>Derivatives Liabilities | 1.746 | 3.235 | (1.489) | (46,03) |
| Setoran Penyelesaian Hapus Buku<br>Deposit for Write-off Settlement | 1.021 | 731 | 290 | 39,67 |
| Setoran Penyelesaian AYDA<br>Deposit for Foreclosed Assets Settlement | 168 | 306 | (138) | (45,10) |
| Titipan Setoran Pajak ke KPPN<br>Deposit Tax Payments to the KPPN | 114 | 3.871 | (3.757) | (97,06) |
| Penampungan Cadangan Biaya *Spin-Off*<br>Escrow for Spin-Off Costs | - | 11.851 | (11.851) | (100,00) |
| Lain-lain<br>Others | 21.191 | 22.568 | (1.377) | (6,10) |
| **Jumlah**<br>**Total** | **399.533** | **390.973** | **8.560** | **2,19** |

## Ekuitas

Jumlah ekuitas pada akhir tahun 2024 mencapai Rp8.600 miliar, mengalami kenaikan 9,87% dibandingkan tahun 2023 yang sebesar Rp7.827 miliar. Peningkatan ini disebabkan pada tahun 2024 terdapat kepentingan non pengendali sebesar Rp567 miliar dan meningkatnya pos saldo laba tidak ditentukan penggunaannya sebesar 17,09%.

## Equity

At the end of 2024, total equity reached Rp8,600 billion, an increase of 9.87% compared to Rp7,827 billion in 2023. This increase is due to the fact that in 2024 there was non-controlling interests amounting to Rp 567 billion and an increase in the unappropriated retained earnings post by 17.09%.

## Rincian Ekuitas
### Details of Equity

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease) | |
|---|---|---|---|---|
| | | | Nominal | % |
| Modal Saham<br>Capital Stock | 1.971.616 | 1.971.616 | - | 0,00 |
| Tambahan Modal Disetor<br>Additional Paid-in Capital | 3.552.194 | 3.552.194 | - | 0,00 |
| Komponen Ekuitas Lainnya<br>Other Equity Components | 502.000 | 588.242 | (86.242) | (14,66) |
| Saldo Laba Ditentukan Penggunaannya<br>Appropriated Retained Earnings | 10.000 | 9.500 | 500 | 5,26 |
| Saldo Laba Tidak Ditentukan Penggunaannya<br>Unappropriated Retained Earnings | 1.996.630 | 1.705.216 | 291.414 | 17,09 |
| Kepentingan Non-Pengendali<br>Non-Controlling Interest | 567.182 | - | 567.182 | 100,00 |
| **Jumlah**<br>**Total** | **8.599.622** | **7.826.768** | **772.854** | **9,87** |

## KINERJA LABA/RUGI

Pada tahun 2024, laba bersih yang dibukukan mencapai Rp370 miliar atau naik 388,33% dari tahun 2023. Kenaikan ini didorong oleh meningkatnya keuntungan dari penjualan efek-efek yang diukur melalui laba rugi dan menurunnya kerugian penurunan nilai aset keuangan (CKPN). Peningkatan laba bersih mendorong naiknya laba bersih per saham dasar dari Rp3,84 menjadi Rp14,75 per lembar saham.

## PROFIT/LOSS PERFORMANCE

In 2024, the Company recorded a net profit of Rp370 billion, representing a significant increase of 388.33% compared to 2023. This substantial growth was driven by higher gains from the sale of securities measured at fair value through profit or loss, as well as a reduction in impairment losses on financial assets. The increase in net profit drove an increase in basic net income per share from Rp3.84 to Rp14.75 per share.

### Laporan Laba Rugi dan Penghasilan Komprehensif
**Statements of Profit or Loss and Comprehensive Income**

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease) | |
|---|---|---|---|---|
| | | | Nominal | % |
| Pendapatan Bunga<br>Interest Revenue | 3.018.913 | 2.781.795 | 237.118 | 8,52 |
| Pendapatan Syariah<br>Sharia Income | 769.990 | 734.016 | 35.974 | 4,90 |
| Beban Bunga<br>Interest Expense | (829.608) | (632.923) | 196.685 | 31,08 |
| Beban Syariah<br>Sharia Expense | (360.487) | (259.569) | 100.918 | 38,88 |
| Pendapatan Bunga dan Syariah – Bersih<br>Interest Revenue and Sharia Income – Net | **2.598.808** | **2.623.319** | **(24.511)** | **(0,93)** |
| **Pendapatan Operasional Lainnya**<br>**Other Operating Revenues** | | | | |
| Provisi dan Komisi Selain dari Kredit<br>Fees and Commissions other than from Loans | 502.363 | 425.536 | 76.827 | 18,05 |
| Keuntungan dari Kenaikan Nilai Wajar Efek-efek yang Diukur melalui Laba Rugi – Bersih<br>Gain on Increase in Fair Value of Securities at Fair Value through Profit and Loss - Net | 5.052 | 67.541 | (62.489) | (92,52) |
| Keuntungan Kurs Mata Uang Asing – Bersih<br>Gain on Foreign Exchange - Net | 104.588 | 76.312 | 28.276 | 37,05 |
| Keuntungan dari Penjualan Efek-efek yang Diukur melalui Laba Rugi – Bersih<br>Gain on Sale of Fair Value of Securities at Fair Value through Profit and Loss - Net | 146.827 | - | 146.827 | 100,00 |
| Penerimaan Kembali Aset yang Telah Dihapusbukukan<br>Recovery of Written-Off Assets | 197.929 | 123.196 | 74.733 | 60,66 |
| Lain-lain<br>Others | 19.589 | 233.480 | (213.891) | (91,61) |
| **Jumlah Pendapatan Operasional**<br>**Total Operating Revenues** | **3.575.156** | **3.549.384** | **25.772** | **0,73** |
| **Beban Operasional Lainnya**<br>**Other Operating Expenses** | | | | |
| Umum dan Administrasi<br>General and Administrative Expenses | (1.456.772) | (1.196.199) | 260.573 | 21,78 |
| Tenaga Kerja<br>Personnel Expense | (1.282.509) | (1.018.965) | 263.544 | 25,86 |
| Kerugian Penurunan Nilai Aset Keuangan<br>Impairment Losses on Financial Assets | (43.538) | (895.494) | (851.956) | (95,14) |
| Penyusutan Aset Tetap dan Aset Hak Guna<br>Depreciation – Property and Equipment and Right-of-Use Assets | (295.164) | (267.244) | 27.920 | 10,45 |
| Biaya Komisi<br>Commission Expense | (42.719) | (33.303) | 9.416 | 28,27 |
| Kerugian dari Penjualan Efek-efek yang Diukur melalui Laba Rugi – Bersih<br>Loss on Sale of Fair Value of Securities at Fair Value through Profit and Loss - Net | - | (7.725) | (7.725) | (100,00) |
| Lain-lain<br>Others | (15.638) | (56.876) | (41.238) | (72,51) |
| **Jumlah Beban Operasional**<br>**Other Operating Expenses** | **(3.136.340)** | **(3.475.806)** | **(339.466)** | **(9,77)** |

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease) | |
|---|---|---|---|---|
| | | | Nominal | % |
| Laba Sebelum Pajak<br>Profit Before Tax | 438.816 | 73.578 | 365.238 | 496,40 |
| Manfaat (Beban) Pajak<br>Tax Benefit (Expense) | (68.679) | 2.218 | 70.897 | 3.196,44 |
| **Laba Bersih**<br>**Net Income** | **370.137** | **75.796** | **294.341** | **388,33** |
| **Laba (Rugi) Komprehensif Lain**<br>**Other Comprehensive Income (Loss)** | | | | |
| Pos yang Akan Direklasifikasi ke Laba Rugi<br>Item that will be Reclassified Subsequently to Profit or Loss | (86.242) | 383.239 | (469.481) | (122,50) |
| Pos yang Tidak Akan Direklasifikasi ke Laba Rugi<br>Items that will not be Reclassified to Profit or Loss | 1.069 | 82.725 | (81.656) | (98,71) |
| **Jumlah Laba (Rugi) Komprehensif Lain**<br>**Total Other Comprehensive Income (Loss)** | **(85.173)** | **465.964** | **(551.137)** | **(118,28)** |
| **Jumlah Laba (Rugi) Komprehensif**<br>**Total Comprehensive Income (Loss)** | **284.964** | **541.760** | **(256.796)** | **(47,40)** |
| **Laba yang Dapat Diatribusikan Kepada:**<br>**Income Attributable to:** | | | | |
| Pemilik Entitas Induk<br>Owners of the Parent Company | 290.845 | 75.796 | 215.049 | 283,72 |
| Kepentingan Non-Pengendali<br>Non-Controlling Interest | 79.292 | - | 79.292 | 100,00 |
| **Laba Komprehensif yang Dapat Diatribusikan Kepada:**<br>**Comprehensive Income Attributable to:** | | | | |
| Pemilik Entitas Induk<br>Owners of the Parent Company | 205.672 | 541.760 | (336.088) | (62,04) |
| Kepentingan Non-Pengendali<br>Non-Controlling Interest | 79.292 | - | 79.292 | 100,00 |
| **Laba Bersih per Saham (Nilai Penuh)**<br>**Earnings per Share (in full Rupiah)** | | | | |
| Dasar<br>Basic | 14,75 | 3,84 | 10,91 | 284,11 |



### Pendapatan Bunga dan Syariah Bersih

Pendapatan bunga dan syariah bersih tercatat sebesar Rp2.599 miliar, turun 0,93% dibandingkan tahun 2023 yang sebesar Rp2.623 miliar. Penurunan ini di sebabkan oleh peningkatan beban bunga yang lebih besar dibandingkan pendapatan bunga.

### Net Interest and Sharia Income

Net interest and sharia income was recorded at Rp2,599 billion, down 0.93% compared to 2023 which was Rp2,623 billion. This decrease was caused by a greater increase in interest expenses compared to interest income.

### Pendapatan Bunga dan Syariah

Pendapatan bunga dan syariah untuk tahun yang berakhir pada tanggal 31 Desember 2024 mencapai Rp3.789 miliar, mencatatkan pertumbuhan yang positif sebesar 7,77% secara tahunan, terutama dari kredit dan pembiayaan yang disalurkan.

### Interest Revenue and Sharia Income

Interest and sharia income for the year ended December 31, 2024 reached Rp3,789 billion, recording a positive growth of 7.77% annually, mainly from loans and financing disbursed.

Pendapatan bunga dari kredit dan pembiayaan yang disalurkan mengalami kenaikan sebesar Rp200 miliar atau 10,69% dibandingkan tahun 2023. Peningkatan pendapatan ini dikarenakan total kredit dan pembiayaan yang mulai meningkat pada triwulan IV-2023 dan mencapai Rp17 triliun di akhir tahun 2023, tetap terjaga pada rentang Rp16 triliun – Rp17 triliun di sepanjang tahun 2024, sebelum mengalami penurunan pada akhir bulan Desember 2024.

Interest income from loans and financing disbursed increased by Rp200 billion or 10.69% compared to 2023. This increase in income was due to total loans and financing starting to increase in the fourth quarter of 2023 and reaching Rp17 trillion at the end of 2023, remaining in the range of Rp16 trillion - Rp17 trillion throughout 2024, before declining at the end of December 2024.

Pendapatan bunga yang diterima dari efek-efek meningkat Rp93 miliar atau 7,78% seiring dengan meningkatnya penempatan dana pada SUKBI dan Sekuritas Rupiah Bank Indonesia.

Interest income received from securities increased by Rp93 billion or 7.78% in line with the increase in fund placements in SUKBI and Bank Indonesia Rupiah Securities.

Di sisi lain, terdapat penurunan pada pendapatan bunga dari efek yang dibeli dengan janji dijual kembali sebesar Rp29 miliar atau 72,88%, sejalan dengan penurunan rata-rata penempatan dari Rp683 miliar menjadi Rp170 miliar, yang dikarenakan Bank mengalihkan penempatan likuiditas pada kredit dan pembiayaan serta aset produktif lain yang memberikan imbal hasil lebih tinggi.

On the other hand, there was a decrease in interest income from securities purchased with resale agreements of Rp29 billion or 72.88%, in line with the decrease in average placement from Rp683 billion to Rp170 billion, which was due to the Bank shifting liquidity placement to credit and financing and other productive assets that provide higher yields.

## Rincian Komponen Pendapatan Bunga dan Syariah
### Details of Interest Revenue and Sharia Income Components

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease) | |
|---|---|---|---|---|
| | | | Nominal | % |
| **Pendapatan Bunga**<br>**Interest Revenue** | | | | |
| **Rupiah** | | | | |
| Kredit yang Diberikan<br>Loans | 1.539.973 | 1.174.841 | 365.132 | 31,08 |
| Efek-efek<br>Securities | 971.883 | 1.041.086 | (69.203) | (6,65) |
| Penempatan pada Bank Lain dan Bank Indonesia<br>Placements with Other Banks and Bank Indonesia | 155.235 | 158.097 | (2.862) | (1,81) |
| Giro pada Bank Lain dan Bank Indonesia<br>Demand Deposits with Other Banks and Bank Indonesia | 19.923 | 21.156 | (1.233) | (5,83) |
| Efek yang Dibeli dengan Janji Jual Kembali<br>Securities Purchased under Agreements to Resell | 10.836 | 39.962 | (29.126) | (72,88) |
| **Jumlah**<br>**Total** | **2.697.850** | **2.435.142** | **262.708** | **10,79** |
| **Mata Uang Asing**<br>**Foreign Currency** | | | | |
| Penempatan pada Bank Lain dan Bank Indonesia<br>Placements with Other Banks and Bank Indonesia | 187.513 | 173.371 | 14.142 | 8,16 |
| Efek-efek<br>Securities | 76.201 | 25.893 | 50.308 | 194,29 |
| Kredit yang Diberikan<br>Loans | 47.198 | 137.995 | (90.797) | (65,80) |
| Giro pada Bank Lain dan Bank Indonesia<br>Demand Deposits with Other Banks and Bank Indonesia | 10.151 | 9.394 | 757 | 8,06 |
| **Jumlah**<br>**Total** | **321.063** | **346.653** | **(25.590)** | **(7,38)** |
| **Jumlah Pendapatan Bunga**<br>**Total Interest Revenues** | **3.018.913** | **2.781.795** | **237.118** | **8,52** |
| **Pendapatan Syariah**<br>**Sharia Income** | | | | |
| **Rupiah** | | | | |
| Piutang dan Pembiayaan Syariah<br>Sharia Receivables and Financing | 477.150 | 555.063 | (77.913) | (14,04) |
| Efek-efek<br>Securities | 237.438 | 125.693 | 111.745 | 88,90 |
| Penempatan pada Bank Lain dan Bank Indonesia<br>Placements with Other Banks and Bank Indonesia | 46.598 | 45.594 | 1.004 | 2,20 |
| Giro pada Bank Lain dan Bank Indonesia<br>Demand Deposits with Other Banks and Bank Indonesia | 3.829 | - | 3.829 | 100,00 |
| **Jumlah**<br>**Total** | **765.015** | **726.350** | **38.665** | **5,32** |
| **Mata Uang Asing**<br>**Foreign Currency** | | | | |
| Piutang dan Pembiayaan Syariah<br>Sharia Receivables and Financing | 3.185 | - | 3.185 | 100,00 |
| Giro pada Bank Lain dan Bank Indonesia<br>Demand Deposits with Other Banks and Bank Indonesia | 1.136 | - | 1.136 | 100,00 |
| Efek-efek<br>Securities | 654 | 699 | (45) | (6,44) |
| Penempatan pada Bank Lain dan Bank Indonesia<br>Placements with Other Banks and Bank Indonesia | - | 6.967 | (6.967) | (100,00) |
| **Jumlah**<br>**Total** | **4.975** | **7.666** | **(2.691)** | **(35,10)** |

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease) | |
|---|---|---|---|---|
| | | | Nominal | % |
| **Jumlah Pendapatan Syariah**<br>Total Sharia Income | 769.990 | 734.016 | 35.974 | 4,90 |
| **Jumlah Pendapatan Bunga dan Syariah**<br>Total Interest Revenues and Sharia Income | 3.788.903 | 3.515.811 | 273.092 | 7,77 |

### Pendapatan Operasional Lainnya

Pendapatan operasional di luar bunga yang dibukukan pada akhir tahun 2024 berjumlah Rp976 miliar, meningkat 5,43% dibandingkan tahun 2023 yang sebesar Rp926 miliar. Peningkatan terbesar dikontribusi oleh keuntungan dari penjualan efek-efek yang diukur melalui laba rugi dimana pada akhir tahun 2024 mencapai sebesar Rp147 miliar.

### Other Operating Revenues

Operating income excluding interest recorded at the end of 2024 amounted to Rp976 billion, an increase of 5.43% compared to 2023 which was Rp926 billion. The largest increase was contributed by gain on sale of securities at fair value through profit and loss which at the end of 2024 reached Rp147 billion.



Ikhtisar Kinerja 2024

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### Pendapatan Operasional

Pada akhir tahun 2024, pendapatan operasional yang dibukukan adalah sebesar Rp3.575 miliar, bertumbuh 0,73% dari tahun 2023 yang sebesar Rp3.549 miliar. Peningkatan tersebut didorong oleh meningkatnya pendapatan operasional lainnya yang meningkat sebesar 5,43%.

### Operating Revenue

At the end of 2024, the operating income recorded was Rp 3,575 billion, growing 0.73% from 2023 which was Rp 3,549 billion. The increase was driven by an increase in other operating income which increased by 5.43%.

### Beban Bunga dan Syariah

Bank mencatat beban bunga dan syariah pada akhir tahun 2024 sebesar Rp1.190 miliar, lebih tinggi 33,35% dibandingkan tahun 2023 yang sebesar Rp892 miliar. Sebesar 82,05% beban bunga dan syariah berasal dari beban simpanan masyarakat, yang naik 30,68% dari Rp747 miliar menjadi Rp976 miliar. Peningkatan ini sejalan dengan pertumbuhan dana simpanan masyarakat yang disertai dengan kenaikan rata-rata cost of fund dari 1,84% menjadi 2,24%. Kenaikan cost of fund dipengaruhi oleh persaingan tingkat suku bunga di pasar dan upaya Bank dalam menjaga kestabilan dana dengan mengakselerasi pertumbuhan layanan nasabah prioritas yang memberikan tingkat suku bunga lebih tinggi. Selain menghasilkan beban bunga dan syariah yang lebih tinggi, pertumbuhan pada simpanan masyarakat juga meningkatkan beban premi penjamin pemerintah sebesar Rp20 miliar atau 20,11% secara tahunan.

### Interest and Sharia Expenses

The Bank recorded interest and sharia expenses amounting to Rp1,190 billion at the end of 2024, representing an increase of 33.35% compared to Rp892 billion in 2023. Approximately 82.05% of the total interest and sharia expenses originated from public deposit costs, which rose by 30.68% from Rp747 billion to Rp976 billion. This increase aligned with the growth in customer deposits, accompanied by a rise in the average cost of funds from 1.84% to 2.24%. The higher cost of funds was influenced by intensified competition in market interest rates and the Bank's efforts to maintain funding stability by accelerating the growth of its priority banking services, which offer higher interest rates. In addition to driving up interest and sharia expenses, the increase in public deposits also led to a rise in government guarantee premium expenses by Rp20 billion, or 20.11% year-on-year.

Beban bunga dari efek yang dijual dengan janji dibeli kembali (repo) juga meningkat Rp32 miliar atau 579,55% secara tahunan, yang disebabkan meningkatnya rata-rata repo selama tahun 2024 sebagai bagian dari pengelolaan likuiditas.

Interest expenses from securities sold under repurchase agreements (repos) also increased by Rp32 billion or 579.55% year-on-year, driven by higher average repo balances throughout 2024 as part of the Bank's liquidity management.

## Rincian Beban Bunga dan Syariah
### Details of Interest and Sharia Expenses

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease) | |
|---|---|---|---|---|
| | | | Nominal | % |
| **Beban Bunga**<br>**Interest Expense** | | | | |
| **Rupiah** | | | | |
| Deposito Berjangka<br>Time Deposits | (335.289) | (269.162) | 66.127 | 24,57 |
| Tabungan<br>Savings | (184.166) | (117.592) | 66.574 | 56,61 |
| Giro<br>Demand Deposits | (98.447) | (100.304) | (1.857) | (1,85) |
| Premi Penjaminan Pemerintah<br>Premium on Government Guarantee | (96.764) | (80.800) | 15.964 | 19,76 |
| Obligasi Subordinasi<br>Subordinated Bonds | (33.494) | (33.220) | 274 | 0,82 |
| Simpanan dari Bank Lain<br>Deposits from Other Banks | (19.891) | (7.210) | 12.681 | 175,88 |
| Efek yang Dijual dengan Janji Dibeli Kembali<br>Securities Sold under Agrements to Repurchase | (38.021) | (5.605) | 32.416 | 578,34 |
| **Jumlah**<br>**Total** | **(806.072)** | **(613.893)** | **66.127** | **24,57** |
| **Mata Uang Asing**<br>**Foreign Currency** | | | | |
| Deposito Berjangka<br>Time Deposits | (18.575) | (10.194) | 8.381 | 82,22 |
| Giro<br>Demand Deposits | (4.501) | (8.819) | (4.318) | (48,96) |
| Simpanan dari Bank Lain<br>Deposits from Other Banks | (460) | (17) | 443 | 2.605,88 |
| **Jumlah**<br>**Total** | **(23.536)** | **(19.030)** | **4.506** | **23,68** |
| **Jumlah Beban Bunga**<br>**Total Interest Expenses** | **(829.608)** | **(632.923)** | **196.685** | **31,08** |
| **Beban Syariah**<br>**Sharia Expense** | | | | |
| **Rupiah** | | | | |
| Deposito Berjangka<br>Time Deposits | (215.329) | (184.268) | 31.061 | 16,86 |
| Tabungan<br>Savings | (93.307) | (40.817) | 52.490 | 128,60 |
| Giro<br>Demand Deposits | (26.432) | (16.032) | 10.400 | 64,87 |
| Premi Penjaminan Pemerintah<br>Premium on Government Guarantee | (20.249) | (16.625) | 3.624 | 21,80 |
| Simpanan dari Bank Lain<br>Deposits from Other Banks | (4.647) | (1.827) | 2.820 | 154,35 |
| Efek yang Dijual dengan Janji Beli Kembali<br>Securities Sold under Agrements to Repurchase | (68) | - | 68 | 100,00 |
| **Jumlah**<br>**Total** | **(360.032)** | **(259.569)** | **(100.463)** | **(38,70)** |
| **Mata Uang Asing**<br>**Foreign Currency** | | | | |
| Giro<br>Demand Deposits | (324) | - | 324 | 100,00 |
| Simpanan dari Bank Lain<br>Deposits from Other Banks | (86) | - | 86 | 100,00 |
| Deposito Berjangka<br>Time Deposits | (43) | - | 43 | 100,00 |
| Tabungan<br>Savings | (2) | - | 2 | 100,00 |
| **Jumlah**<br>**Total** | **(455)** | **-** | **455** | **100,00** |
| **Jumlah Beban Syariah**<br>**Total Sharia Expenses** | **(360.487)** | **(259.569)** | **100.918** | **38,88** |
| **Jumlah Beban Bunga dan Syariah**<br>**Total Interest and Sharia Expenses** | **(1.190.095)** | **(892.492)** | **297.603** | **33,35** |

**Beban Operasional Lainnya**

Beban operasional lainnya untuk tahun yang berakhir pada tanggal 31 Desember 2024 adalah Rp3.136 miliar, menurun 9,77% dibandingkan tahun 2023 yang sebesar Rp3.476 miliar. Penurunan pada beban operasional dikontribusi oleh kerugian peningkatan nilai aset keuangan (CKPN) yang turun sebesar 95,14% atau Rp852 miliar, sejalan dengan terjaganya kualitas kredit dan pembiayaan. Di sisi lain, beban tenaga kerja mengalami peningkatan sebesar 25,86% atau Rp 264 milliar dari tahun sebelumnya, dikarenakan adanya peraturan pajak natura. Beban umum dan administrasi naik 21,78% atau setara dengan Rp261 miliar, sebesar 66,72% dari kenaikan ini merupakan beban pemeliharaan dan perbaikan perangkat lunak.

**Laba Sebelum Pajak Penghasilan dan Laba Bersih**

Laba sebelum pajak penghasilan yang dibukukan pada akhir tahun 2024 sebesar Rp439 miliar, bertumbuh 496,40% atau Rp365 miliar dari akhir tahun 2023. Pertumbuhan ini disebabkan oleh pendapatan operasional yang bertumbuh positif, disertai dengan penurunan pada beban operasional lainnya. Laba bersih sebesar Rp370 miliar, bertumbuh 388,33% atau Rp294 miliar dari tahun sebelumnya. Pertumbuhan ini mendorong naik laba bersih per saham dari Rp3,84 menjadi Rp14,75.

## KINERJA ARUS KAS

Bank Sinarmas mencatat posisi saldo kas dan setara kas pada akhir tahun 2024 sebesar Rp16.963 miliar. Dibandingkan tahun 2023 yang sebesar Rp15.331 miliar, terjadi kenaikan 10,65%.

### Statements of Cash Flows

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease) | |
|---|---|---|---|---|
| | | | Nominal | % |
| Arus Kas Diperoleh dari (Digunakan untuk) Aktivitas Operasi<br>Cash Flows Provided by (Used in) Operating Activities | 1.165.114 | 4.628.695 | (3.463.581) | (74,83) |
| Arus Kas Diperoleh dari (Digunakan untuk) Aktivitas Investasi<br>Cash Flows Provided by (Used in) Investing Activities | (152.118) | (188.267) | 36.149 | (19,20) |
| Arus Kas Diperoleh dari (Digunakan untuk) Aktivitas Pendanaan<br>Cash Flows Provided by (Used in) Financing Activities | 372.097 | (111.120) | 483.217 | (434,86) |
| **Kenaikan (Penurunan) Bersih Kas dan Setara Kas**<br>**Net Increase (Decrease) in Cash and Cash Equivalents** | **1.385.093** | **4.329.308** | **(2.944.215)** | **(68,01)** |
| Kas dan Setara Kas Awal Tahun<br>Cash and Cash Equivalents at the Beginning of the Year | 15.331.170 | 11.042.096 | 4.289.074 | 38,84 |
| Pengaruh Perubahan Kurs Mata Uang Asing<br>Effect on Foreign Exchange Rate Changes | 247.050 | (40.234) | 287.284 | (714,03) |
| **Kas dan Setara Kas Akhir Tahun**<br>**Cash and Cash Equivalents at the End of the Year** | **16.963.313** | **15.331.170** | **1.632.143** | **10,65** |

### Arus Kas dari Aktivitas Operasi

Bank memperoleh kas dari aktivitas operasi pada tahun 2024 mencapai Rp 1.165 miliar, lebih rendah 74,83% dibandingkan tahun 2023 yang sebesar Rp4.629 miliar. Perolehan kas dari aktivitas operasi berasal dari pergerakan pos-pos aset dan liabilitas, dimana pada tahun 2023 terjadi kenaikan signifikan pada pos liabilitas perusahaan yaitu simpanan sebesar Rp 2.745 miliar, simpanan dari bank lain sebesar Rp 313 miliar dan repo sebesar 1.051 miliar.

**Other Operating Expenses**

Other operating expenses for the year ended December 31, 2024 amounted to Rp3,136 billion, marking a decrease of 9.77% compared to Rp3,476 billion in 2023. This decline was primarily driven by a significant reduction in expected credit loss expenses (CKPN), which fell by 95.14% or Rp852 billion, in line with the maintained quality of credit and financing. On the other hand, personnel expenses increased by 25.86% or Rp264 billion from the previous year, mainly due to the implementation of the fringe benefit tax regulation. General and administrative expenses rose by 21.78% or Rp261 billion, with 66.72% of the increase attributable to software maintenance and repair costs.

**Profit Before Income Tax and Net Profit**

Profit before income tax recorded at the end of 2024 was Rp439 billion, growing 496.40% or Rp365 billion from the end of 2023. This growth was due to positive growth in operating income, accompanied by a decrease in other operating expenses. Net profit was Rp370 billion, growing 388.33% or Rp294 billion from the previous year. This growth drove up net profit per share from Rp3.84 to Rp14.75.

## CASH FLOWS PERFORMANCE

Bank Sinarmas recorded the position of cash and cash equivalents at the end of 2024 at Rp16,963 billion, an increase of 10.65% compared to 2023, which amounted to Rp15,331 billion.

### Cash Flow from Operating Activities

The Bank generated cash of Rp 1,165 billion from operating activities in 2024, 74.83% lower than Rp4,629 billion in 2023. Cash generated from operating activities came from the movement of asset and liability posts, where in 2023, there was a significant increase of Rp2,745 billion in deposits, Rp313 billion in deposits from other banks, and Rp1,051 billion in repos in the Company's liability account.

## Arus Kas dari Aktivitas Investasi

Kas yang digunakan Bank untuk aktivitas investasi di tahun 2024 mencapai Rp 152 miliar, turun 19,15% dibandingkan tahun 2023 yang sebesar Rp188 miliar. Penggunaan kas dengan nominal tersebut sebagian besar dari perolehan asset tetap untuk mengakuisisi perangkat keras dan lunak sebesar 137 miliar guna memenuhi kebutuhan pengembangan teknologi informasi Bank di era digitalisasi.

## Cash Flow from Investing Activities

The Bank's cash spent on investment activities in 2024 reached Rp152 billion, down 19.15% from Rp188 billion in 2023. The Bank spent that much cash to acquire fixed assets in the form of hardware and software worth Rp137 billion to meet its information technology development needs in the digitalization era.

## Arus Kas dari Aktivitas Pendanaan

Pada tahun 2024, Bank menggunakan kas bersih untuk aktivitas pendanaan sebesar Rp 372 miliar, lebih tinggi 235,14% dibandingkan tahun 2023 yang sebesar Rp111 miliar. Kondisi ini disebabkan pada tahun 2024 Bank memperoleh dana masuk dari pemegang saham non pengendali atas Bank Nano Syariah sebesar 490 miliar, sebagai hasil proses spin off Unit Usaha Syariah menjadi Bank Nano Syariah pada tahun 2024.

## Cash Flow from Financing Activities

In 2024, the Bank used net cash for financing activities of Rp372 billion, 235.14% higher than Rp111 billion in 2023. This condition was caused by the Bank receiving fund of to Rp490 billion from non-controlling shareholders of Bank Nano Syariah in 2024, following the spin-off process of the Sharia Business Unit into Bank Nano Syariah in 2024.

# RASIO KEUANGAN

Kinerja rasio-rasio keuangan Bank di tahun 2024 diungkapkan pada tabel berikut.

# FINANCIAL RATIOS

The performance of the Bank's financial ratios in 2024 is revealed in the following table.

### Rasio Kinerja dan Kepatuhan Bank
**Bank Performance and Compliance Ratio**

dalam % | in %

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease)<br>(%) |
|---|---|---|---|
| **Rasio Kinerja**<br>**Performance Ratio** | | | |
| CAR | 30,46 | 25,34 | 5,12 |
| Aset Produktif Bermasalah dan Non- Produktif Bermasalah terhadap Jumlah Aset Produktif dan Aset Non- Produktif<br>Non-Performing Earning Assets and Non-Earning Assets to Total Earning Assets and Non-Earning Assets | 1,27 | 1,49 | (0,22) |
| Aset Produktif Bermasalah terhadap Jumlah Aset Produktif<br>Non-Performing Earning Assets to Total Earning Assets | 1,41 | 1,66 | (0,25) |
| NPL Bruto<br>Gross NPL | 1,49 | 1,53 | (0,04) |
| NPL Neto<br>Net NPL | 0,30 | 0,35 | (0,05) |
| ROA | 0,82 | 0,15 | 0,67 |
| ROE | 5,01 | 1,07 | 3,94 |
| NIM | 5,89 | 6,26 | (0,37) |
| BOPO | 90,83 | 103,36 | (12,53) |
| LDR | 32,68 | 40,94 | (8,26) |
| **Rasio Kepatuhan**<br>**Compliance Ratio** | | | |
| Persentase Pelanggaran BMPK<br>Percentage of Legal Lending Limit (LLL) Violation | | | |
| Pihak Terkait<br>Related Party | Nil | Nil | - |
| Pihak Tidak Terkait<br>Non-Related Party | Nil | Nil | - |
| Persentase Pelampauan BMPK<br>Percentage of LLL Excess | | | |
| Pihak Terkait<br>Related Party | Nil | Nil | - |

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease)<br>(%) |
|---|---|---|---|
| Pihak Tidak Terkait<br>Non-Related Party | Nil | Nil | - |
| Giro Wajib Minimum Rupiah<br>Minimum Statutory Reserves (Rupiah) | 12,93 | 15,22 | (2,29) |
| Giro Wajib Minimum Valuta Asing<br>Minimum Statutory Reserves (Foreign Currency) | 3,95 | 4,09 | (0,14) |
| Posisi Devisa Neto<br>Net Open Position | 1,13 | 6,57 | (5,44) |

## KEMAMPUAN MEMBAYAR UTANG

Kemampuan Bank Sinarmas dalam memenuhi kewajiban utangnya tahun 2024, baik jangka pendek maupun jangka panjang masuk kategori baik. Hal itu tercermin dari kinerja serta kemampuan memenuhi segala kewajiban yang jatuh tempo secara tepat waktu. Bank menggunakan parameter rasio likuiditas, rentabilitas, dan solvabilitas untuk mengukur kemampuan memenuhi seluruh kewajiban, baik jangka panjang maupun pendek, serta menghitung kemampuan penyediaan cadangan likuiditas.

### Rasio Likuiditas

Likuiditas yang memadai merupakan prioritas Bank. Pengelolaan likuiditas dilakukan dengan menempatkan sebagian dana pada penempatan jangka pendek berisiko rendah, seperti penempatan di Bank Indonesia dalam bentuk deposit facility dan reverse repo, serta melakukan transaksi repo.

Kecukupan likuiditas dipantau secara harian melalui rasio alat likuid terhadap non-core deposit (AL/NCD) dan dana pihak ketiga (AL/DPK). Di samping itu, Bank juga menggunakan beberapa indikator lainnya seperti rasio kredit terhadap DPK (loan to deposit ratio/LDR), rasio intermediasi makroprudensial (RIM), liquidity coverage ratio (LCR), serta net stable funding ratio (NSFR).

Pada tahun 2024, rata-rata LDR sebesar 38,05%, dengan RIM di level 44,77%. Sementara rata-rata rasio AL/NCD dan rasio AL/DPK masing-masing 148,77% dan 37,48%, lebih tinggi dari persyaratan Otoritas Jasa Keuangan yang sebesar 50,00% dan 10,00%.

LCR dan NSFR Bank pada akhir tahun 2024 masing-masing sebesar 281,30% dan 190,70%. Pencapaian ini juga melampaui threshold yang ditetapkan oleh regulator. Tingginya rasio-rasio yang digunakan sebagai tolak ukur likuiditas mengindikasikan Bank dalam kondisi likuid.

## DEBT-SERVICE ABILITY

Bank Sinarmas' capability to fulfill its debt obligations in 2024, both short-term and long-term, is categorized as good. This is reflected in the performance and ability to fulfill all maturing obligations on time. The Bank uses the parameters of liquidity, profitability, and solvency ratios to measure the ability to fulfill all obligations, both long-term and short-term, as well as to calculate the ability to provide liquidity reserves.

### Liquidity Ratio

Maintaining adequate liquidity is a top priority for the Bank. Liquidity management is carried out by allocating a portion of funds into low-risk short-term placements, such as placements with Bank Indonesia in the form of deposit facilities and reverse repos, as well as engaging in repo transactions.

Liquidity adequacy is monitored daily through the ratio of liquid assets to non-core deposits (AL/NCD) and to third-party funds (AL/TPF). In addition, the Bank also uses several other indicators such as the loan to deposit ratio (LDR), macroprudential intermediation ratio (RIM), liquidity coverage ratio (LCR), and net stable funding ratio (NSFR).

In 2024, the average LDR was 38.05%, with RIM at 44.77%. The average AL/NCD ratio and AL/DPK ratio were 148.77% and 37.48.%, respectively, higher than the Financial Services Authority requirements of 50.00% and 10.00%.

At the end of 2024, the Bank's Liquidity Coverage Ratio (LCR) and Net Stable Funding Ratio (NSFR) stood at 281.30% and 190.70%, respectively. These figures exceeded the thresholds set by the regulator. The high levels of these key liquidity indicators reflect the Bank's strong liquidity position.

dalam % | in %

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease)<br>(%) |
|---|---|---|---|
| RIM | 44,77 | 51,24 | (6,47) |
| LCR | 281,30 | 265,97 | 15,33 |
| NSFR | 190,70 | 170,52 | 20,18 |

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease)<br>(%) |
|---|---|---|---|
| LDR – rata rata<br>LDR - Average | 38,05 | 39,40 | (1,35) |
| AL/NCD – rata rata<br>AL/NCD - Average | 148,77 | 158,40 | (9,63) |
| AL/DPK – rata rata<br>AL/DPK - Average | 37,48 | 38,10 | (0,62) |

## Rasio Rentabilitas

Pada tahun 2024 sebagian besar rasio-rasio rentabilitas mengalami peningkatan apabila dibandingkan dengan akhir tahun 2023. Perbaikan ini disebabkan oleh meningkatnya pendapatan operasional lainnya serta menurunnya beban operasional lainnya. Kualitas kredit dan pembiayaan juga membaik tercermin dari rasio NPL bruto sebesar 1,49%, turun 0,04% dari tahun sebelumnya. Di sisi lain, rasio NIM tercatat lebih rendah disebabkan pendapatan bunga dan syariah bersih mengalami penurunan sementara aset produktif mengalami peningkatan.

## Profitability Ratio

In 2024, most profitability ratios increased compared to the end of 2023. This improvement was due to an increase in other operating income that was compensated by a decrease in other operating expenses. Credit and financing quality also improved, as reflected in a gross NPL ratio of 1.49%, down by 0.04% from the previous year. On the other hand, the Net Interest Margin (NIM) ratio declined, driven by a decrease in net interest and sharia income, despite an increase in productive assets.

### Indikator Rasio Rentabilitas Bank
**Indicator of the Bank Profitability Ratio**

dalam % | in %

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease)<br>(%) |
|---|---|---|---|
| ROA | 0,82 | 0,15 | 0,67 |
| ROE | 5,01 | 1,07 | 3.94 |
| NIM | 5,89 | 6,26 | (0,37) |
| NPL Bruto<br>Gross NPL | 1,49 | 1,53 | (0,04) |
| NPL Neto<br>Net NPL | 0,30 | 0,35 | (0,05) |
| BOPO | 90,83 | 103,36 | (12,53) |

## Rasio Solvabilitas

Rasio solvabilitas adalah rasio untuk menilai kemampuan perusahaan dalam melunasi semua kewajibannya. Untuk memantau kecukupan modal Bank digunakan rasio kewajiban penyediaan modal minimum (KPMM) atau *capital adequacy ratio* (CAR). CAR merupakan rasio modal terhadap aset tertimbang menurut risiko (ATMR). Bank Indonesia menetapkan modal minimum yang dipelihara oleh Bank harus disesuaikan dengan profil risiko.

Bank Sinarmas memiliki permodalan yang sehat dan mampu menyerap risiko kredit, risiko pasar, dan risiko operasional, dengan tingkat CAR sebesar 30,46%. Rasio ini mengalami peningkatan jika dibandingkan dengan tahun 2023 yang sebesar 25,34%. Peningkatan pada CAR dikarenakan total modal meningkat sebesar 1,64% sementara total ATMR mengalami penurunan sebesar 15,47%.

## Solvency Ratio

The solvency ratio is used to assess a company's ability to meet all its obligations. The Bank uses the Capital Adequacy Ratio (CAR) to monitor the adequacy of its capital. CAR is the ratio of capital to risk-weighted assets (RWA). Bank Indonesia sets the minimum capital that banks must maintain in line with their risk profile.

Bank Sinarmas has a sound capital and can absorb credit risk, market risk, and operational risk, with a CAR level of 30.46%. This ratio has increased compared to 25.34% in 2023. The increase in the Capital Adequacy Ratio (CAR) was driven by a 1.64% rise in total capital, coupled with a 15.47% decrease in total Risk-Weighted Assets (RWA).

## Indikator Rasio Solvabilitas Bank
**Indicator of the Bank Solvency Ratio**

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | 2024 | 2023 | Pertumbuhan (Penurunan)<br>Increase (Decrease) | |
|---|---|---|---|---|
| | | | Nominal | % |
| CAR (%) | 30,46 | 25,34 | | 5,12 |
| Modal Inti<br>Core Capital | 7.452.811 | 7.283.216 | 169.595 | 2,33 |
| Modal Pelengkap<br>Supplementary Capital | 672.316 | 711.607 | (38.716) | (5,45) |

## Tingkat Kolektibilitas Piutang

Bank memiliki syarat dan ketentuan dalam penyaluran kredit. Hal ini diperlukan sebagai langkah awal mitigasi risiko terhadap kredit bermasalah. Selain itu, secara konsisten dan berkesinambungan, Bank mengevaluasi proses kredit dari hulu ke hilir, melakukan review, memperbarui kebijakan atau ketentuan perkreditan, serta secara aktif melakukan penanganan atas kredit bermasalah.

Tingkat kredit bermasalah (*non-performing loan*/NPL) bruto dan NPL neto pada tahun 2024 masing-masing sebesar 1,49% dan 0,30%, mengalami perbaikan dibandingkan tahun 2023 yang sebesar 1,53% dan 0,35%.

## Receivables Collectibility

The Bank has terms and conditions for credit disbursement. This is necessary as an initial step in mitigating non-performing loan risks. In addition, consistently and continuously, The bank evaluates the credit process from upstream to downstream, conducts reviews, updates credit policies or provisions, and actively handles problematic credit.

The gross and net non-performing loan (NPL) rates in 2024 1.49% and 0.30%, an improvement compared to 2023 which were 1.53% and 0.35%.

## Perkembangan Tingkat Kolektibilitas Bank
**Development of the Bank Collectibility**

dalam jutaan Rupiah | in million Rupiah

| Jenis<br>Type | Lancar<br>Current | Dalam Perhatian Khusus<br>Special Mention | Kurang Lancar<br>Substandard | Diragukan<br>Doubtful | Macet<br>Loss | Jumlah<br>Total |
|---|---|---|---|---|---|---|
| **2024** | | | | | | |
| Rupiah | 12.497.757 | 1.226.367 | 27.508 | 22.581 | 167.591 | 13.941.804 |
| Mata Uang Asing<br>Foreign Currency | 354.448 | 59.551 | - | - | - | 413.999 |
| **Jumlah<br>Total** | **12.852.205** | **1.285.918** | **27.508** | **22.581** | **167.591** | **14.355.803** |
| **2023** | | | | | | |
| Rupiah | 14.315.628 | 1.765.388 | 55.299 | 20.773 | 183.932 | 16.341.020 |
| Mata Uang Asing<br>Foreign Currency | 464.219 | 66.207 | - | - | - | 530.426 |
| **Jumlah<br>Total** | **14.779.847** | **1.831.595** | **55.299** | **20.773** | **183.932** | **16.871.446** |

## SUKU BUNGA DASAR KREDIT

Sesuai dengan regulasi, bank umum yang menjalankan kegiatan usaha secara konvensional memiliki kewajiban untuk melaporkan dan mempublikasikan Suku Bunga Dasar Kredit (SBDK) dalam mata uang Rupiah. Publikasi ini untuk memberikan kejelasan dan memudahkan nasabah dalam menimbang manfaat, biaya dan risiko kredit yang ditawarkan.

Bank Sinarmas menginformasikan SBDK setiap bulannya melalui website dan di kantor cabang. Informasi mengenai perubahan SBDK dapat dilihat melalui website www.banksinarmas.com.

## PRIME LENDING RATES

Commercial banks that conduct conventional business must report and publish the Prime Lending Rate (SBDK) in Rupiah in accordance with regulations. This publication is to provide clarity and facilitate customers in weighing the benefits, costs, and risks of the credit offered.

Bank Sinarmas informs SBDK every month through its website and at branch offices. Information regarding changes to SBDK can be viewed through the website www.banksinarmas.com.

dalam % | in %

| Akhir Periode<br>End of Period | Suku Bunga Dasar Kredit Rupiah berdasarkan Segmen Kredit<br>Prime Lending Rates in Rupiah by Credit Segment | | | | |
|---|---|---|---|---|---|
| | Kredit Korporasi<br>Corporate Credit | Kredit Ritel<br>Retail Credit | Kredit Mikro<br>Micro Credit | Kredit Konsumsi<br>Consumer Credit | |
| | | | | KPR | Non-KPR |
| Triwulan I-2024<br>Quarter I-2024 | 10,50 | 11,00 | 14,00 | 8,00 | 10,50 |
| Triwulan II-2024<br>Quarter II-2024 | 10,50 | 11,00 | 14,00 | 8,00 | 10,50 |
| Triwulan III-2024<br>Quarter III-2024 | 10,50 | 11,00 | 14,00 | 8,00 | 10,50 |
| Triwulan IV-2024<br>Quarter IV-2024 | 10,07 | 9,19 | 11,09 | 7,85 | 10,35 |

## STRUKTUR MODAL

### Kebijakan Struktur Modal

Struktur modal Bank, terdiri dari Modal Inti (*Tier* 1) dan Modal Pelengkap (*Tier* 2).

### Modal Inti (*Tier* 1)

Modal Inti (*Tier* 1), terdiri dari Modal Inti Utama (*Common Equity Tier*/CET 1) dan Modal Inti Tambahan (*Additional Tier* 1). Modal inti utama mencakup modal disetor, cadangan tambahan modal (*disclosure 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). Sebagian besar struktur modal Bank adalah modal inti sebesar Rp7.453 miliar atau 91,73% dari jumlah modal.

## CAPITAL STRUCTURE

### Capital Structure Policy

Bank capital structure consists of Core Capital (Tier 1) and Supplementary Capital (Tier 2).

### Core Capital (Tier 1)

Core Capital (Tier 1) consists of Common Equity Tier 1 (CET 1) and Additional Tier 1 Capital. CET 1 includes paid-up capital, additional capital reserves (disclosure reserve), and deductions from core capital.

Additional capital reserves consist of positive factors (other comprehensive income and other additional capital reserves) and negative factors (other comprehensive income and other additional capital reserves). The majority of the Bank's capital structure is core capital amounting to Rp7,453 billion or 91.73% of the total capital.

### Rincian Struktur Modal

**Details of Capital Structure**

dalam jutaan Rupiah | in million Rupiah

| Uraian<br>Description | 2024 | 2023 |
|---|---|---|
| **Komponen Modal**<br>**Capital Component** | | |
| Modal Inti<br>Core Capital | 7.452.811 | 7.283.216 |
| Modal Pelengkap<br>Supplementary Capital | 672.316 | 711.607 |
| **Jumlah Modal**<br>**Total Capital** | **8.125.127** | **7.994.823** |
| **Aset Tertimbang Menurut Risiko (ATMR)**<br>**Risk Weighted Assets (RWA)** | | |
| Risiko Kredit Setelah Memperhitungkan Risiko Spesifik<br>Credit Risk After Considering Specific Risk | 16.974.337 | 20.197.024 |
| Risiko Pasar<br>Market Risk | 2.975.110 | 4.118.159 |
| Risiko Operasional<br>Operational Risk | 6.723.016 | 7.237.461 |
| **Jumlah ATMR untuk Risiko Kredit, Pasar, dan Operasional**<br>**Total RWA for Credit, Market, and Operational Risks** | **26.672.463** | **31.552.644** |

| Uraian<br>Description | 2024 | 2023 |
|---|---|---|
| **Rasio Kewajiban Penyediaan Modal Minimum (KPPM) yang Tersedia**<br>**Capital Adequacy Ratio (CAR)** | | |
| KPPM dengan Memperhitungkan Risiko Kredit (%)<br>CAR with Credit Risk (%) | 47,87 | 39,58 |
| KPPM dengan Memperhitungkan Risiko Kredit dan Pasar (%)<br>CAR with Credit and Market Risks (%) | 40,73 | 32,87 |
| KPPM dengan Memperhitungkan Risiko Kredit dan Operasional (%)<br>CAR with Credit and Operational Risks (%) | 34,29 | 29,14 |
| KPPM dengan Memperhitungkan Risiko Kredit, Operasional, dan Pasar (%)<br>CAR with Credit, Operational, and Market Risks (%) | 30,46 | 25,34 |
| **Rasio KPPM yang Diwajibkan berdasarkan Profil Risiko (%)**<br>**Minimum Capital Adequacy Ratio based on the Profile Risk (%)** | **10,00** | **10,00** |



## IKATAN MATERIAL UNTUK INVESTASI BARANG MODAL

Sepanjang tahun buku 2024, Bank tidak melakukan ikatan material untuk investasi barang modal.

## INVESTASI BARANG MODAL

Sepanjang tahun 2024, Bank Sinarmas merealisasikan investasi barang modal sebesar Rp153 miliar, lebih rendah 8,16% dibandingkan tahun 223 yang Rp167 miliar.

## MATERIAL COMMITMENTS FOR CAPITAL GOODS INVESTMENT

During the financial year 2024, the Bank did not make any material commitments for investment in capital goods.

## CAPITAL GOODS INVESTMENT

Throughout 2024, Bank Sinarmas actualized investment in capital goods of Rp153 billion, 8.16% lower than in 2023, which was Rp167 billion.

### Realisasi Investasi Barang Modal
**Realization of Capital Goods Investment**

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | Tujuan Investasi<br>Objectives of Investment | Realisasi investasi<br>Realization of Investment | |
|---|---|---|---|
| | | 2024 | 2023 |
| Bangunan<br>Building | Untuk mendukung kegiatan operasional Bank.<br>To support the Bank's operational activities. | 1.512 | 1.899 |
| Inventaris Kantor<br>Office Inventory | Untuk mendukung kegiatan operasional Bank.<br>To support the Bank's operational activities. | 151.352 | 164.587 |
| Kendaraan Bermotor<br>Vehicle | Untuk mendukung kegiatan operasional Bank.<br>To support the Bank's operational activities. | 224 | 203 |
| **Jumlah**<br>**Total** | Untuk mendukung kegiatan operasional Bank.<br>To support the Bank's operational activities. | **153.088** | **166.689** |

## INFORMASI DAN FAKTA MATERIAL YANG TERJADI SETELAH TANGGAL PELAPORAN AKUNTAN

Bank Sinarmas tidak mengalami peristiwa pernting yang bersifat material setelah tanggal pelaporan akuntan untuk tahun buku yang berakhir 31 Desember 2024.

## INFORMATION AND FACT SUBSEQUENT TO REPORTING DATE

Bank Sinarmas did not experience any material events after the accountant's reporting date for the fiscal year ended December 31, 2024.

## TARGET, REALISASI DAN PROYEKSI

### Target dan Realisasi Tahun 2024

Kinerja Bank pada tahun 2024 dinilai baik. Jika dibandingkan dengan target, maka total aset dan beberapa pos aset produktif mempunyai tingkat pencapaian di bawah 100% yaitu pada kisaran 83% - 95%. Belum tercapainya target pos-pos aset ini dipengaruhi oleh penghimpunan dana pihak ketiga yang mencapai 94,34% dari target yang ditetapkan.

Dari sisi laba rugi, Bank mencatat laba sebelum pajak sebesar Rp439 miliar berada di atas target sebesar Rp363

## TARGET, REALIZATION, AND PROJECTION

### Target and Realization in 2024

The Bank's performance in 2024 is considered good. When compared to the target, total assets and several productive asset items have an achievement level below 100%, namely in the range of 83% - 95%. The failure to achieve the target for these asset items was influenced by the collection of third-party funds which reached 94.34% of the set target.

From a profit and loss perspective, the Bank recorded a pre-tax profit of Rp439 billion in 2024, exceeding the target of Rp363

miliar, tercapainya target laba disebabkan oleh pendapatan operasional diluar bunga berada diatas anggaran dengan pencapaian 114,14%. Terpenuhinya target laba menyebabkan beberapa rasio keuangan utama juga mencapai target, yaitu rasio ROA, ROE, dan BOPO yang masing-masing di 0,82%, 5,01% dan 90,83%. Pada akhir tahun 2024 Bank melakukan hapus buku sehingga rasio NPL Bruto dan Neto tercatat sebesar 1,49% dan 0,30%, lebih baik dari target yang sebesar 2,09% dan 0,40%.

billion. This achievement was primarily driven by non-interest operating income, which reached 114.14% of the budget. The fulfillment of the profit target also led to several key financial ratios meeting their respective targets, namely Return on Assets (ROA) at 0.82%, Return on Equity (ROE) at 5.01%, and the Operating Efficiency Ratio (BOPO) at 90.83%. At the end of 2024, the Bank conducted a write-off, resulting in improved gross and net NPL ratios of 1.49% and 0.30%, respectively—better than the targeted levels of 2.09% and 0.40%.

## Pencapaian Tahun 2024
### 2024 Achievements

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | Target | Realisasi<br>Realization | Pencapaian<br>Achievement<br>(%) |
|---|---|---|---|
| Aset<br>Assets | 58.617.578 | 55.624.433 | 94,89 |
| Kredit dan Pembiayaan<br>Loan and Financing | 16.337.478 | 14.648.347 | 89,66 |
| Giro dan Penempatan pada Bank Indonesia dan Bank Lain<br>Current Account and Placement with Bank Indonesia and Other Banks | 19.805.634 | 16.454.106 | 83,08 |
| Surat Berharga<br>Securities | 19.739.687 | 22.123.275 | 112,08 |
| Surat Berharga yang Dibeli Dengan Janji Dijual Kembali<br>Securities Purchased under Agreements to Resell | 250.000 | 192.215 | 76,89 |
| Dana Pihak Ketiga<br>Third-Party Fund | 47.510.873 | 44.819.964 | 94,34 |
| CASA (%) | 71,21 | 71,37 | 100,22 |
| Pendapatan Bunga<br>Interest Revenue | 3.844.702 | 3.788.903 | 98,55 |
| Beban Bunga<br>Interest Expense | 1.075.135 | 1.190.095 | 110,69 |
| Pendapatan Operasional di Luar Bunga<br>Fee-based Income | 855.389 | 976.348 | 114,14 |
| Beban Operasional di Luar Bunga<br>Overhead Cost | 3.250.780 | 3.136.340 | 96,48 |
| Laba Sebelum Pajak<br>Profit before Tax | 362.632 | 438.816 | 121,01 |
| CAR (%) | 28,52 | 30,46 | 106,82 |
| LDR (%) | 34,39 | 32,68 | 95,04 |
| ROA (%) | 0,68 | 0,82 | 121,07 |
| ROE (%) | 3,74 | 5,01 | 133,97 |
| NIM (%) | 5,62 | 5,89 | 104,77 |
| BOPO (%) | 92,04 | 90,83 | 98,69 |
| NPL Bruto (%)<br>Gross NPL (%) | 2,09 | 1,49 | 71,37 |
| NPL Neto (%)<br>Net NPL (%) | 0,40 | 0,30 | 74,12 |
| Struktur Modal<br>Capital Structure | 8.071.037 | 8.125.127 | 100,67 |

## Proyeksi Tahun 2025

Target kinerja Bank Sinarmas tahun 2025 adalah sebagai berikut.

## Projection for 2025

Bank Sinarmas's performance targets for 2025 are as follows:

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | Target |
|---|---|
| Aset<br>Assets | 62.524.898 |
| Kredit dan Aset Ijarah<br>Loans and Ijarah Assets | 19.197.392 |
| Dana Pihak Ketiga<br>Third-Party Fund | 51.057.744 |
| CASA (%) | 71,43 |
| Pendapatan Bunga<br>Interest Revenue | 4.143.803 |
| Beban Bunga<br>Interest Expense | 1.128.082 |
| Pendapatan Operasional di Luar Bunga<br>Fee-based Income | 854.743 |
| Beban Operasional di Luar Bunga<br>Overhead Cost | 3.495.432 |
| Laba Sebelum Pajak<br>Profit before Tax | 397.509 |
| CAR (%) | 27,59 |
| LDR (%) | 34,84 |
| ROA (%) | 0,73 |
| ROE (%) | 4,08 |
| NIM (%) | 6,06 |
| BOPO (%) | 92,50 |
| NPL Bruto (%)<br>Gross NPL (%) | 2,04 |
| NPL Neto (%)<br>Net NPL (%) | 0,40 |
| Struktur Modal<br>Capital Structure | 8.837.036 |

## Asumsi Makro dan Mikro yang Digunakan

Bank Sinarmas menggunakan beberapa asumsi makro dan mikro pada saat menyusun target tahun 2025 sebagai berikut.

## Macro and Micro Assumption Used

Bank Sinarmas uses several macro and micro assumptions in formulating its 2025 targets as follows.

| Uraian<br>Description | Satuan<br>Unit | Proyeksi 2025<br>2025 Projection |
|---|---|---|
| **Asumsi Makro**<br>**Macro Assumption** | | |
| Pertumbuhan PDB<br>GDP Growth | % | 5,00 |
| Inflasi<br>Inflation | % | 2,50 |
| Nilai Tukar USD/Rp<br>US$/Rp Exchange Rate | Rp | 16.400 |
| **Asumsi Mikro**<br>**Micro Assumption** | | |
| *7 Days Reverse Repo Rate* | % | 5,25 |
| Pertumbuhan Kredit<br>Credit Growth | % | 10-11 |
| Pertumbuhan DPK<br>Third-Party Fund Growth | % | 6-7 |

## PROSPEK USAHA

Pada tahun 2025, pertumbuhan ekonomi Indonesia diperkirakan tumbuh moderat di kisaran 4,7–5,1%, sedikit direvisi turun oleh Bank Indonesia (BI) dari proyeksi sebelumnya karena lemahnya ekspor, konsumsi rumah tangga, dan investasi swasta. BI juga menurunkan suku bunga acuan sebesar 25 bps menjadi 5,75% pada Januari 2025 untuk mendorong pertumbuhan, yang diperkirakan akan dipertahankan sementara waktu demi menjaga stabilitas rupiah yang tertekan.

Di sisi global, pertumbuhan ekonomi dunia diproyeksikan stagnan pada kisaran 3,3% menurut IMF dan 2,7% menurut Bank Dunia, mencerminkan masih adanya tekanan dari ketidakpastian geopolitik, inflasi yang belum sepenuhnya reda, serta arah kebijakan suku bunga di negara-negara maju. Meskipun konsumsi masyarakat dan investasi publik menjadi faktor pendukung di dalam negeri, tantangan eksternal seperti melemahnya permintaan global, ketidakpastian perdagangan internasional, dan tekanan nilai tukar tetap membayangi prospek ekonomi nasional.

Sektor perbankan Indonesia menunjukkan ketahanan yang solid memasuki awal 2025, dengan kinerja intermediasi yang tetap kuat meskipun mengalami sedikit perlambatan. Likuiditas perbankan juga tetap memadai, dengan rasio alat likuid terhadap dana pihak ketiga (AL/DPK) tercatat sebesar 26,03% pada Januari 2025, meningkat dari 25,59% pada Desember 2024. Bank Indonesia memproyeksikan pertumbuhan kredit pada 2025 berada dalam kisaran 11–13%, sejalan dengan prospek pertumbuhan ekonomi yang tetap baik dan dukungan kebijakan makroprudensial. Dengan kondisi ini, sektor perbankan diharapkan terus berkontribusi positif terhadap perekonomian nasional.

Memasuki tahun 2025, Bank Sinarmas meyakini dana pihak ketiga dan kredit akan bertumbuh dari tahun 2024. Penghimpunan dana pihak ketiga tetap diarahkan pada peningkatan giro dan tabungan melalui produk dan layanan yang sudah berjalan maupun pengembangan atas produk-produk yang telah ada. Penghimpunan dana melalui layanan nasabah prioritas juga akan berlanjut, dengan pembukaan kantor-kantor khusus untuk Bank Sinarmas Prioritas. Terkait kredit, penyaluran kredit akan dilakukan dengan memanfaatkan serta mengembangkan ekosistem yang ada, di samping memperluas penyaluran kredit melalui skema kerjasama dengan pihak ketiga.

Selain itu, Bank juga senantiasa melengkapi fitur *Mobile Banking* Bank Sinarmas untuk melakukan *cross selling* produk Bank dan kemudahan transaksi bagi nasabah serta meningkatkan pemasaran atau promosi produk dan layanan melalui beragam media untuk meningkatkan *awareness* nasabah mengenai layanan dan fasilitas dari Bank Sinarmas.

## BUSINESS PROSPECT

In 2025, Indonesia's economic growth is estimated at a moderate 4.7–5.1%, slightly revised down by Bank Indonesia (BI) from the previous projection due to weak exports, household consumption, and private investment. BI also lowered the benchmark interest rate by 25 bps to 5.75% in January 2025 to boost growth, which is expected to be maintained for the time being in order to preserve the stability of the pressured rupiah.

On the global side, world economic growth is projected to stagnate in the range of 3.3% according to the IMF and 2.7% according to the World Bank, reflecting ongoing pressure from geopolitical uncertainty, stubborn inflation, and the interest rate policy direction in developed nations. While public consumption and public investment will be supporting factors domestically, external challenges such as weakening global demand, uncertainty in international trade, and exchange rate pressures will loom ov the national economic outlook.

Indonesia's banking sector has shown solid resilience entering early 2025, with intermediation performance remaining strong despite a slight slowdown. Banking liquidity will also remain adequate, with the ratio of liquid assets to third-party funds (AL/TPF) recorded at 26.03% in January 2025, up from 25.59% in December 2024. Bank Indonesia projects credit growth in 2025 to be in the range of 11–13%, which is in line with the strong economic growth outlook and support from macroprudential policies. With this condition, the banking sector shouldo continue to contribute positively to the national economy.

Entering 2025, Bank Sinarmas believes that third-party funds and credit will grow from 2024. The collection of third-party funds remains directed at increasing current accounts and savings through existing products and services as well as the development of existing products. The collection of funds through priority customer services will also continue, with the opening of special offices for Bank Sinarmas Prioritas. Credit distribution will be carried out by utilizing and developing the existing ecosystem, in addition to expanding credit distribution through cooperation schemes with third parties.

In addition, the Bank will also continue to add more features to its Bank Sinarmas Mobile Banking for cross-selling bank products and facilitating transactions for customers while increasing marketing or promotion of products and services through various media to increase customer awareness of Bank Sinarmas services and facilities.

## ASPEK PEMASARAN

### Strategi Pemasaran

Di tahun 2024, Bank terus memperkuat fondasi untuk mewujudkan tujuan Bank Sinarmas untuk menjadi *payment and transaction* Bank dengan jaringan distribusi terlengkap dan terintegrasi. Bank terus menciptakan kerja nyata dan kolaborasi dalam segala aspek usahanya, dengan berfokus pada ekosistem sekeliling Bank. Berbagai langkah strategis, inovasi yang berkelanjutan serta peningkatan kualitas SDM juga terus dilanjutkan sepanjang tahun 2024 yang didukung oleh implementasi prinsip tata kelola perusahaan yang baik, untuk memperkuat landasan usaha Bank Sinarmas di masa yang akan datang.

Dari segi pengumpulan dana, Bank tetap fokus pada peningkatan porsi dana-dana murah (CASA) serta pertumbuhan nasabah baru. Pertumbuhan penghimpunan dana, khususnya giro dan tabungan diperoleh dengan memanfaatkan produk dan aktivitas yang sudah berjalan disertai dengan pengembangan yang terus dilakukan atas produk-produk yang telah ada.

Bank melakukan *campaign* atau promosi, baik promo yang dilakukan sendiri maupun yang dilakukan berdasarkan kerja sama dengan pihak *biller* atau mitra yang bertujuan untuk meningkatkan *user*, *usage*, maupun pendapatan *fee based*.

Bank Sinarmas di tahun 2024 tetap berfokus pada pengembangan pelayanan Sinarmas Prioritas dengan *preposition* unik untuk nasabah-nasabah *affluent* terutama dalam bidang *entrepreneur,* dengan penawaran menarik dari *partner* yang bekerjasama dengan Bank Sinarmas. Ke depan, Bank akan meneruskan fokus untuk menyediakan penawaran menarik bagi nasabah melalui variasi layanan dan produk yang kompetitif. Bank juga ikut serta dalam perkembangan perbankan digital dengan menerbitkan tabungan digital serta menggalakkan penggunaan channel digital untuk transaksi nasabah.

Bank terus mengembangkan produk dan layanan dalam rangka menyediakan jasa *financial solution* dengan mempertimbangkan *customer life cycle* dan kebutuhan nasabah melalui layanan seluruh *channel touch point* yang ada serta melakukan kerja sama *(co-branding)* dengan beberapa *partner* yang telah memiliki jaringan luas dan ternama. Hal ini menjadi salah satu strategi untuk meningkatkan nilai ekuitas Bank Sinarmas dan *partner*.

## MARKETING ASPECT

### Marketing Strategy

In 2024, Bank Sinarmas continued to strengthen the foundation to realize the Bank's goal, which is to become a payment and transaction bank with the most complete and integrated distribution network. The Bank continued to create real work and collaboration in all aspects of business, focusing on its surrounding ecosystems. Various strategic steps, sustainable innovations and improvements in the quality of human resources also continued as the year progressed, driven by the implementation of good corporate governance principles, to strengthen the foundation of Bank Sinarmas' business in the future.

In terms of fundraising, the Bank's focus remained on increasing the portion of low-cost funds (CASA) and growth of new customers. The growth in fundraising, especially demand deposits and savings, to be obtained by utilizing existing products and activities as well as ongoing development of existing products.

The Bank also ran campaigns or promotions, both run solely and those run in collaboration with billers or partners that aim to increase users, usage, and fee-based income.

In 2024, the Bank also focused on developing Sinarmas Prioritas services with a unique preposition for affluent especially in the field of entrepreneurship customers, with attractive offers partners who cooperate with Bank Sinarmas. Going forward, the Bank will continue to focus on providing offers through a variety of competitive services and products. The Bank also participated in the development of digital banking by issuing digital savings and encouraging the use of digital channels for customer transactions.

The Bank continued to develop products and services in order to provide financial solution services by considering the customer life cycle and customer needs through services for all existing touch point channels. In addition, the Bank collaborates (co-branding) with several partners who already have extensive and well-known networks. This was one of the strategies to increase the equity value of Bank Sinarmas and partners.

Sedangkan dari segi pembiayaan diarahkan pada penyaluran kredit dengan skema *Supply Chain Financing* (SCF) atau fasilitas Kredit Modal Kerja (KMK) kepada satu mata rantai bisnis, kredit produktif beragunan *fixed asset* penyaluran Kredit Tanpa Agunan kepada karyawan perusahaan yang telah bekerjasama untuk pembayaran *payroll* melalui Bank Sinarmas, memaksimalkan penyaluran kredit kepada pelaku-pelaku UMKM melalui produk program KUR (Kredit Usaha Rakyat) dan kredit produktif Simas KUK beragunan *fixed asset*. Selain itu Bank juga melakukan kemitraan dengan perusahaan *Financial Technology* dalam rangka melakukan meningkatkan penyaluran kredit konsumtif dan kredit produktif.

Meanwhile, in terms of financing, it is directed at lending with the Supply Chain Financing (SCF) scheme or Working Capital Credit (KMK) facility to one business chain, productive credit with fixed asset collateral, distribution of Unsecured Credit to employees of companies that have collaborated for payroll payments through Bank Sinarmas, maximizing lending to MSME players through KUR (KreditUsaha Rakyat) program products and Simas KUK productive credit with fixed asset collateral. In addition, the Bank also partners with Financial Technology companies in order to increase the distribution of consumptive and productive loans.

Bank melakukan penguatan serta perbaikan proses pemantauan kualitas kredit, *closed monitoring* melalui call report serta memberikan langkah penanganan (restrukturisasi) secara efektif kepada debitur yang mengalami penurunan usahanya disesuaikan dengan kondisi dan prospek usaha, serta kapasitasnya.

The Bank strengthened and improved the credit quality monitoring process, closed monitoring through call reports and provides effective handling steps (restructuring) to debtors who experienced a decline in their business adjusted to business conditions and prospects, and their capacity.

Dalam rangka meningkatkan pertumbuhan pendapatan berbasis *fee*, Bank aktif dalam aktivitas *cross* dan *up-selling* untuk produk *Bancassurance*, Reksadana, maupun produk Treasury di seluruh jaringan kantor dengan melengkapi *range product* yang variatif. Bank juga meningkatkan akses *channel* pemasaran lewat *mobile banking* serta *internet banking* agar memberikan kemudahan transaksi perbankan saat ini.

In order to increase fee-based income growth, the Bank was active in cross and up-selling activities for Bancassurance products, Mutual Funds, and treasury products throughout the office network by completing a varied product range. The Bank also increased access to marketing channels through mobile banking and internet banking to provide convenience for current banking transactions.

Kemudahan, akses transaksi lewat seluruh *touch point e-channel* maupun jaringan kantor telah meningkatkan transaksi nasabah lewat jaringan ATM/CRM, mesin EDC, serta QRIS, yang dilakukan lewat *mobile banking* dan *internet banking*.

Convenience, transaction access through all e-channel touch points and office networks has increased customer transactions through ATM/CRM networks, EDC machines, and QRIS, which were carried out via mobile banking and internet banking.

## Pangsa Pasar Bank Sinarmas
**Bank Sinarmas Market Share**

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | 2024 | | | 2023 | | |
|---|---|---|---|---|---|---|
| | Bank Sinarmas | KBMI II | Pangsa Pasar<br>Market Share<br>(%) | Bank Sinarmas | KBMI II | Pangsa Pasar<br>Market Share<br>(%) |
| Kredit *Gross*<br>Gross Credit | 14.648 | 890.587 | 1,64 | 17.256 | 834.792 | 2,07 |
| Dana Pihak Ketiga<br>Third-Party Fund | 44.820 | 1.048.891 | 4,27 | 42.146 | 989.283 | 4,26 |
| Aset<br>Assets | 55.624 | 1.674.828 | 3,32 | 52.635 | 1.558.864 | 3,38 |

## DIVIDEN

### Kebijakan Dividen

Anggaran Dasar Bank Sinarmas dan peraturan perundang-undangan yang berlaku mencantumkan ketentuan kesetaraan saham. Seluruh saham Bank yang telah ditempatkan, termasuk saham baru yang akan dikeluarkan dalam rangka Penawaran Umum, memiliki hak yang sama dan sederajat dalam segala hal dengan Pemegang Saham lama termasuk hak atas dividen. Dalam rangka pembagian dividen, Bank tidak memiliki *negative covenants* sehubungan dengan pembatasan pihak ketiga.

Bank juga wajib memperhatikan CAR setelah memperhitungkan risiko pasar, risiko kredit, dan risiko operasional mencapai ≥20%, serta kondisi likuiditas tahun berjalan. Besaran dividen tunai akan disesuaikan dengan keuntungan yang diperoleh Bank pada tahun buku bersangkutan, dengan tidak mengurangi hak dari Rapat Umum Pemegang Saham (RUPS) untuk menentukan lain sesuai dengan ketentuan Anggaran Dasar Perseroan. Dividen yang diterima oleh para Pemegang Saham yang bukan merupakan Warga Negara Indonesia (WNI) akan dikenakan pajak sesuai dengan peraturan yang berlaku di Indonesia.

### Realisasi Dividen

Pada tahun 2024, Bank memutuskan untuk tidak membagikan dividen dari hasil kinerja tahun buku 2023. Laba yang diperoleh akan digunakan untuk memperkuat permodalan serta dana pencadangan.

## KOMPENSASI JANGKA PANJANG BERUPA PROGRAM KEPEMILIKAN SAHAM OLEH KARYAWAN DAN/ATAU MANAJEMEN (ESOP/MSOP)

Hingga akhir tahun buku 2024, Bank Sinarmas tidak menjalankan program kepemilikan saham oleh karyawan dan/atau manajemen (ESOP/MSOP). Oleh karena itu. Bank tidak mengungkapkan informasi ini.

## PENGGUNAAN DANA HASIL PENAWARAN UMUM

Pada tanggal 29 Juni 2022, Grup menerbitkan Obligasi Subordinasi Berkelanjutan I Bank Sinarmas Tahap I Tahun 2022 sebesar Rp500.000. Obligasi subordinasi ini berjangka waktu 5 tahun yang akan jatuh tempo pada tanggal 8 Juli 2027. Tingkat suku bunga sebesar 6,50% per tahun dan dibayarkan setiap tiga bulan sejak tanggal emisi.

Dana yang diperoleh dari hasil Penawaran Umum Berkelanjutan Obligasi Subordinasi Berkelanjutan I Bank Sinarmas Tahap I Tahun 2022 setelah dikurangi dengan biaya-biaya emisi terkait, seluruhnya akan dipergunakan oleh Perusahaan untuk memperkuat permodalan yang diperhitungkan sebagai modal pelengkap (*Tier* 2) dalam rangka mendukung rencana penyaluran kredit dengan tenor yang lebih panjang.

## DIVIDEND

### Dividend Policy

Bank Sinarmas' Articles of Association and applicable laws and regulations include provisions on share equality. All shares of the Bank that have been issued including new shares to be issued in a Public Offering, have the same rights and privileges in all respects with existing Shareholders, including the right to dividends. In dividends distribution, the Bank does not have negative covenants regarding third-party restrictions.

The Bank is also obliged to consider the CAR (Capital Adequacy Ratio) after considering market risk, credit risk, and operational risk reaching ≥20%, as well as the current year's liquidity conditions. The amount of cash dividends will be adjusted based on the profits earned by the Bank in the respective fiscal year, without prejudice to the right of the General Meeting of Shareholders (GMS) to determine otherwise in accordance with the provisions of the Company's Articles of Association. Dividends received by Shareholders who are not Indonesian citizens (non-WNI) will be subject to tax according to the prevailing regulations in Indonesia.

### Dividend Realization

In 2024, the Bank decided not to distribute dividends from the 2023 financial year performance. The profit earned will be used to strengthen capital and reserve funds.

## LONG-TERM COMPENSATION OF EMPLOYEE AND/OR MANAGEMENT STOCK OWNERSHIP PROGRAM (ESOP/MSOP)

Until the end of the fiscal year 2024, Bank Sinarmas did not implement an Employee Stock Ownership Program (ESOP) or Management Stock Ownership Program (MSOP). Therefore, the Bank did not disclose this information.

## UTILIZATION OF PROCEEDS FROM PUBLIC OFFERING

On June 29, 2022, the Group issued Shelf Registration Subordinated Bonds I Bank Sinarmas Phase I Year 2022 amounting to Rp500,000. The subordinated bonds have a 5-year tenor and will mature on July 8, 2027. The interest rate is 6.50% per annum and payable quarterly from the issuance date.

The proceeds from the Shelf Registration Subordinated Bonds I Bank Sinarmas Phase I Year 2022 after deducting the related issuance costs, will be used by the Company to strengthen its capital which is calculated as supplementary capital (Tier 2) in order to support the lending plan with a longer tenor.

Pada Desember 2022, Perusahaan telah menggunakan seluruh dana hasil Penawaran Umum Berkelanjutan Obligasi Subordinasi I untuk penyaluran kredit dengan tenor panjang.

## INFORMASI MATERIAL TERKAIT DENGAN INVESTASI, EKSPANSI, DIVESTASI, AKUISISI, DAN RESTRUKTURISASI

Per tanggal 1 Januari 2024, sesuai Akta No. 2 tanggal 2 Januari 2024 yang dibuat di hadapan Aulia Taufani, S.H., Notaris di Jakarta, pemisahan unit usaha syariah PT Bank Sinarmas Tbk. telah efektif dilakukan dengan pendirian Bank Umum Syariah baru dengan nama PT Bank Nano Syariah. Dengan dipisahkannya Unit Usaha Syariah tersebut, maka selanjutnya PT Bank Sinarmas Tbk. tidak lagi melakukan kegiatan usaha syariah, dan telah dilakukan perubahan kegiatan usaha pada Pasal 3 Anggaran Dasar PT Bank Sinarmas Tbk. sebagaimana termaktub dalam Akta Pernyataan Keputusan Rapat Perubahan Anggaran Dasar No. 3 tanggal 2 Januari 2024 yang dibuat di hadapan Aulia Taufani, S.H., Notaris di Jakarta, yang telah memperoleh persetujuan sesuai dengan Surat Keputusan Menteri Hukum dan Hak Asasi Manusia Republik Indonesia No. AHU-0000118.AH.01.02 Tahun 2024 tanggal 2 Januari 2024. PT Bank Nano Syariah telah tercatat dalam Administrasi Pengawasan Otoritas Jasa Keuangan sebagai Anggota Kelompok Usaha Bank dengan Perusahaan Induk PT Bank Sinarmas Tbk.

## TRANSAKSI MATERIAL YANG MENGANDUNG BENTURAN KEPENTINGAN DAN/ATAU TRANSAKSI DENGAN PIHAK AFILIASI/BERELASI

### Nama dan Sifat Hubungan Berelasi

Bank Sinarmas memiliki relasi dengan perusahaan-perusahaan yang berada dalam Grup Sinar Mas selain karyawan kunci:

1. Pemegang Saham (termasuk Pemegang Saham Akhir) Bank, PT Sinarmas Multiartha Tbk dan PT Shinta Utama;
2. Perusahaan-perusahaan yang dimiliki secara langsung atau tidak langsung oleh Pemegang Saham Bank; dan
3. Perusahaan-perusahaan yang dikendalikan oleh anggota keluarga dekat Pemegang Saham dan manajemen kunci Bank.

### Nilai Transaksi Pihak Berelasi

Uraian terkait dengan saldo transaksi dengan pihak berelasi disampaikan melalui tabel di bawah ini.

As of December 2022, the Company has used all proceeds from the Shelf Registration Offering of Subordinated Bonds I for lending with longer tenors.

## MATERIAL INFORMATION RELATED TO INVESTMENT, EXPANSION, DIVESTMENT, ACQUISITION, AND RESTRUCTURING

As of January 1, 2024, pursuant to Deed No. 2 dated January 2, 2024 made before Aulia Taufani, S.H., Notary in Jakarta, the bookkeeping of the sharia business unit of PT Bank Sinarmas Tbk. has been effectively carried out with the establishment of a new Sharia Bank under the name of PT Bank Nano Syariah. With the spin off of the Sharia Business Unit, PT Bank Sinarmas Tbk. no longer runs sharia-compliant banking business, and has made changes to the business activities in Article 3 of its Articles of Association. as stated in the Deed of Statement of Meeting Decisions on Amendments to the Articles of Association No. 3 dated January 2, 2024 made before Aulia Taufani, S.H., Notary in Jakarta, which has obtained approval in accordance with the Decree of the Minister of Law and Human Rights of the Republic of Indonesia No. AHU-0000118.AH.01.02 of 2024 dated January 2, 2024. PT Bank Nano Syariah has been registered in the Financial Services Authority Supervisory Administration as a Member of the Bank Business Group with the Parent Company PT Bank Sinarmas Tbk.

## MATERIAL TRANSACTIONS CONTAINING CONFLICT OF INTEREST AND/OR TRANSACTIONS WITH AFFILIATED/ RELATED PARTIES

### Name and Nature of the Related Parties

Bank Sinarmas has relationships with companies within the Sinar Mas Group other than key employees:

1. Shareholders (including Ultimate Shareholders) of the Bank, PT Sinarmas Multiartha Tbk, and PT Shinta Utama;
2. Companies directly or indirectly owned by the Shareholders of the Bank; and
3. Companies controlled by close family members of the Shareholders and key management of the Bank.

### Value of Related Party Transactions

The description related to the balance of transactions with related parties is presented in the table below.

dalam jutaan Rupiah, kecuali dinyatakan lain | in million Rupiah, unless otherwise stated

| Uraian<br>Description | 2024 | | 2023 | |
|---|---|---|---|---|
| | Jumlah (jutaan Rupiah)<br>Total (million Rupiah) | Persentase terhadap Jumlah Aset/Liabilitas/ Dana Syirkah Temporer<br>Percentage to Total Assets/Liabilities/ Temporary Syirkah Fund<br>(%) | Jumlah (jutaan Rupiah)<br>Total (million Rupiah) | Persentase terhadap Jumlah Aset/Liabilitas/ Dana Syirkah Temporer<br>Percentage to Total Assets/Liabilities/ Temporary Syirkah Fund<br>(%) |
| **Aset**<br>**Assets** | | | | |
| Efek-efek<br>Securities | 1.079.140 | 1,94 | 1.140.803 | 2,17 |
| Kredit<br>Loans | 297.395 | 0,53 | 211.039 | 0,40 |
| Pendapatan yang Masih Akan Diterima<br>Accrued Income | 143 | 0,00 | 212 | 0,00 |
| Biaya Dibayar di Muka<br>Prepaid Expense | 4.280 | 0,01 | 400 | 0,00 |
| Aset Lain-lain<br>Other Assets | 35.584 | 0,06 | 39.103 | 0,07 |
| **Liabilitas**<br>**Liabilities** | | | | |
| Liabilitas Segera<br>Liabilities Immediately Payable | 314 | 0,00 | 1.535 | 0,00 |
| Simpanan<br>Deposits | 5.634.290 | 14,05 | 5.918.217 | 15,66 |
| Beban yang Masih Harus Dibayar<br>Accrued Expense | 1.647 | 0,00 | 1.802 | 0,00 |
| **Dana Syirkah Temporer**<br>**Temporary Syirkah Fund** | | | | |
| Simpanan<br>Deposits | 195.989 | 2,83 | 899.014 | 12,81 |

## KEBIJAKAN PENELAAHAN DAN PERSETUJUAN TRANSAKSI

### Penjelasan Kewajaran Transaksi

Bank Sinarmas memastikan bahwa transaksi dengan pihak berelasi dilakukan secara wajar, seperti transaksi dengan pihak ketiga. Bank senantiasa mempertimbangkan dan memenuhi segala persyaratan dalam peraturan perundang-undangan yang berlaku, antara lain seperti tercantum dalam Peraturan Otoritas Jasa Keuangan Nomor 42/POJK.04/2020 tentang Transaksi Afiliasi Dan Transaksi Benturan Kepentingan.

### Informasi Pemenuhan Peraturan

Seluruh transaksi yang dilakukan dengan pihak berelasi/terafiliasi telah mematuhi peraturan perundang-undangan yang berlaku. Bank juga telah memiliki pedoman pelaksanaan yang menjadi acuan dalam melaksanakan transaksi Perseroan dengan pihak berelasi/terafiliasi.

Pedoman tersebut mengacu pada sejumlah ketentuan, antara lain:

1. Undang-Undang No. 8 tahun 1995 tentang Pasar Modal;
2. Peraturan Otoritas Jasa Keuangan Republik Indonesia No. 17/POJK.04/2020 tentang Transaksi Material dan

## TRANSACTION REVIEW AND APPROVAL POLICY

### Explanation of Transaction Fairness

Bank Sinarmas ensures that transactions with related parties are conducted fairly as those with third parties. The Bank always considers and fulfills all requirements in the prevailing laws and regulations, among others, as stated in the Financial Services Authority Regulation Number 42/POJK.04/2020 concerning Affiliated Transactions and Conflict of Interest Transactions.

### Information on Regulatory Compliance

All transactions conducted with related/affiliated parties complied with the prevailing laws and regulations. The Bank also has implementation guidelines that serve as a reference in carrying out the Company's transactions with related/affiliated parties.

The guidelines refer to a number of provisions, among others:

1. Law No. 8 of 1995 on the Capital Market;
2. Regulation of the Financial Services Authority of the Republic of Indonesia No. 17/POJK.04/2020 concerning

Perubahan Kegiatan Usaha;
3. POJK 42/2020 tentang Transaksi Afiliasi dan Transaksi Benturan Kepentingan; dan
4. Anggaran Dasar Perseroan.

Dengan demikian, transaksi Perseroan tahun 2024 telah mematuhi seluruh ketentuan yang berlaku serta tidak terdapat pelanggaran terhadap peraturan perundang-undangan terkait dengan transaksi dengan pihak berelasi/terafiliasi.

## Pernyataan Direksi bahwa Transaksi telah Memenuhi Prosedur Memadai dan Sesuai Praktik Bisnis yang Berlaku Umum

Direksi telah melakukan penelahan terhadap transaksi dengan pihak afiliasi/berelasi yang dilakukan oleh Bank. Direksi memandang bahwa transaksi tersebut telah memenuhi prosedur memadai serta sesuai dengan praktik bisnis yang berlaku umum. Seluruh transaksi pada tahun 2024 dilakukan dengan memperhatikan praktik bisnis yang berlaku umum dan prinsip *arm's length* (prinsip transaksi yang wajar).

Transaksi tersebut, antara lain sejalan dengan POJK 42/2020 yang menyatakan bahwa perusahaan terbuka yang melakukan transaksi afiliasi wajib memiliki prosedur yang memadai untuk memastikan bahwa transaksi afiliasi dilaksanakan sesuai dengan praktik bisnis yang berlaku umum.

## Peran Dewan Komisaris dan Komite Audit untuk Memastikan Transaksi Dilakukan sesuai Praktik Bisnis yang Berlaku Umum, yang Antara Lain Dilakukan dengan Memenuhi Prinsip Transaksi yang Wajar (*Arms-Length Principle*)

Dewan Komisaris dan Komite Audit menilai bahwa transaksi dengan pihak afiliasi/berelasi dilakukan oleh Bank pada tahun 2024 telah melalui prosedur yang memadai. Selain itu, transaksi dilaksanakan sesuai dengan praktik bisnis yang berlaku umum, yakni memenuhi prinsip transaksi yang wajar (*arms length principle*).

Informasi transaksi afiliasi atau transaksi material yang dilakukan oleh Bank pada tahun buku juga diungkapkan dalam laporan keuangan tahunan.

## Halaman Rujukan dalam Laporan Keuangan

Informasi terkait dengan transaksi berelasi/terafiliasi yang lebih rinci termuat dalam Laporan Keuangan yang telah diaudit dan terdapat dalam Laporan Tahunan ini, yakni di bagian lampiran halaman 597.

Material Transactions and Changes in Business Activities;
3. POJK 42/2020 concerning Affiliated Transactions and Conflict of Interest Transactions; and
4. The Company's Articles of Association.

Therefore, the Company's transactions in 2024 complied with all applicable provisions, and there were no violations of laws and regulations related to transactions with related/affiliated parties.

## Board of Directors' Statement that the Transaction has Fulfilled Adequate Procedures and Conforms to Generally Accepted Business Practices

The Board of Directors reviewed the transactions with affiliated/related parties conducted by the Bank. The Board of Directors considers that the transactions fulfilled adequate procedures and conformed to generally accepted business practices. All transactions in 2024 were carried out with due regard to generally accepted business practices and arm's length principles.

These transactions, among others, are in line with POJK 42/2020 which states that public companies conducting related party transactions must have adequate procedures to ensure that related party transactions are carried out in accordance with generally accepted business practices.

## Board of Commissioners and Audit Committee's Role to Ensure Transactions are Conducted according to Generally Accepted Business Practices, among others, by Fulfilling the Arms-Length Principle.

The Board of Commissioners and Audit Committee consider that the Bank's 2024 transactions with affiliated/related parties followed adequate procedures. In addition, the transactions were carried out in accordance with generally accepted business practices, which fulfill the arms-length principle.

Information on affiliated transactions or material transactions conducted by the Bank in the fiscal year is also disclosed in the annual financial statements.

## Reference Page in the Financial Statements

More detailed information related to related/affiliated transactions is contained in the audited Financial Statements contained in this Annual Report in the appendix section on page 597.

## PERUBAHAN PERUNDANG-UNDANGAN YANG BERPENGARUH SIGNIFIKAN

## AMENDMENTS TO LAWS AND REGULATIONS THAT HAD SIGNIFICANT IMPACTS

| No. | Regulasi<br>Regulation | Dampak Bagi Bank dan Tindak Lanjut Bank Sinarmas<br>Impact to the Bank and Bank Sinarmas Follow-Up |
|---|---|---|
| 1 | Surat Edaran Otoritas Jasa Keuangan Nomor 24/SEOJK.03/2023 tentang Penilaian Tingkat Maturitas Digital Bank Umum<br><br>Circular Letter of the Financial Services Authority Number 24/SEOJK.03/2023 concerning the Assessment of Digital Maturity Levels of Commercial Banks | PT. Bank Sinarmas Tbk. telah mempersiapkan aspek-aspek yang mempengaruhi penilaian maturitas digital, sehingga hasil penilaian tingkat maturitas digital PT. Bank Sinarmas Tbk. tidak menghambat Bank dalam melakukan pengembangan berbasis IT.<br><br>PT. Bank Sinarmas Tbk. has prepared the aspects influencing digital maturity assessments to ensure that the results of its digital maturity evaluation do not hinder the Bank's IT-based development initiatives. |
| 2 | Peraturan Otoritas Jasa Keuangan Nomor 21 Tahun 2023 tentang Layanan Digital oleh Bank Umum<br><br>Regulation of the Financial Services Authority Number 21 of 2023 concerning Digital Services by Commercial Banks | PT. Bank Sinarmas Tbk. telah menyesuaikan proses dan dokumen yang dibutuhkan untuk mengajukan perizinan terkait layanan digital kepada OJK.<br><br>PT. Bank Sinarmas Tbk. has adjusted the processes and documentation required for submitting digital service licensing applications to the Financial Services Authority (OJK). |
| 3 | Peraturan Anggota Dewan Gubernur Nomor 22 Tahun 2023 tentang Perubahan atas PADG Nomor 22/26/PADG/2020 tentang Kepesertaan Operasi Moneter<br><br>Regulation of the Member of the Board of Governors Number 22 of 2023 concerning Amendments to PADG Number 22/26/PADG/2020 regarding Participation in Monetary Operations | PT. Bank Sinarmas Tbk. sebagai Peserta Operasi Moneter, telah melakukan kewajiban yakni menyampaikan bukti pendaftaran tresuri *dealer* kepada Bank Indonesia.<br><br>As a Monetary Operation Participant, PT. Bank Sinarmas Tbk. has fulfilled its obligation to submit proof of treasury dealer registration to Bank Indonesia. |
| 4 | Peraturan Anggota Dewan Gubernur Nomor 21 Tahun 2023 tentang Peraturan Pelaksanaan Pinjaman Likuiditas Jangka Panjang Bagi Bank Umum Konvensional<br><br>Regulation of the Member of the Board of Governors Number 21 of 2023 concerning the Implementation Guidelines for Long-Term Liquidity Loans for Conventional Commercial Banks | PT. Bank Sinarmas Tbk. telah melakukan pengkinian ketentuan internal tentang *Standard Operating Procedure* (SOP) Pinjaman Likuiditas Jangka Pendek (PLJP) Bank Indonesia Versi 2.0<br><br>PT. Bank Sinarmas Tbk. has updated its internal provisions regarding the Standard Operating Procedure (SOP) for Bank Indonesia's Short-Term Liquidity Loans (PLJP) Version 2.0. |
| 5 | Peraturan Otoritas Jasa Keuangan No 30 tahun 2024 tentang Konglomerasi Keuangan dan Perusahaan Induk Konglomerasi Keuangan<br><br>Regulation of the Financial Services Authority Number 30 of 2024 concerning Financial Conglomerates and Financial Conglomerate Holding Companies | PT. Bank Sinarmas Tbk. selaku Entitas Utama Konglomerasi Keuangan telah melakukan kajian atas POJK tersebut, serta melakukan koordinasi dan komunikasi kepada PT Sinar Mas Multiartha Tbk selaku Perusahaan Induk. Selanjutnya PT. Bank Sinarmas Tbk. bersama PT Sinar Mas Multiartha Tbk melakukan persiapan untuk permohonan pengajuan Perusahaan Induk Konglomerasi Keuangan Sinar Mas kepada OJK.<br><br>As the Main Entity of a Financial Conglomerate, PT. Bank Sinarmas Tbk. has conducted a review of the relevant OJK regulation, coordinated and communicated with PT Sinar Mas Multiartha Tbk as the Parent Company, and jointly prepared the application for Sinar Mas Financial Conglomerate Parent Company status submission to OJK. |
| 6 | Peraturan Anggota Dewan Gubernur Nomor 20 Tahun 2023 tentang Tata Cara Pelaksanaan Pelindungan Konsumen Bank Indonesia<br><br>Regulation of the Member of the Board of Governors Number 20 of 2023 concerning Procedures for the Implementation of Consumer Protection by Bank Indonesia | PT. Bank Sinarmas Tbk. telah membentuk unit kerja Pelindungan Konsumen dan membuat ketentuan internal mengenai pelindungan konsumen.<br><br>PT. Bank Sinarmas Tbk. has established a Consumer Protection unit and formulated internal regulations regarding consumer protection. |
| 7 | Peraturan Bank Indonesia Nomor 15 Tahun 2023 tentang Perubahan Ketiga atas Perubahan Bank Indonesia Nomor 22/14/PBI/2020 tentang Operasi Moneter<br><br>Regulation of Bank Indonesia Number 15 of 2023 concerning the Third Amendment to Bank Indonesia Regulation Number 22/14/PBI/2020 on Monetary Operations | PT. Bank Sinarmas Tbk. telah menyesuaikan ketentuan internal terkait operasi moneter.<br><br>PT. Bank Sinarmas Tbk. has adjusted its internal policies related to monetary operations. |

| No. | Regulasi<br>Regulation | Dampak Bagi Bank dan Tindak Lanjut Bank Sinarmas<br>Impact to the Bank and Bank Sinarmas Follow-Up |
|---|---|---|
| 8 | Peraturan Otoritas Jasa Keuangan Nomor 29 Tahun 2023 tentang Pembelian Kembali Saham yang Dikeluarkan oleh Perusahaan Terbuka<br><br>Regulation of the Financial Services Authority Number 29 of 2023 concerning Share Buybacks by Public Companies | PT. Bank Sinarmas Tbk. telah menerapkan prinsip kehati hatian dalam hal melakukan pembelian kembali saham yang dikeluarkan oleh Perusahaan Terbuka.<br><br>PT. Bank Sinarmas Tbk. has applied prudential principles in conducting the repurchase of shares issued by a Public Company. |
| 9 | Peraturan Otoritas Jasa Keuangan Nomor 22 Tahun 2023 tentang Pelindungan Konsumen dan Masyarakat Pada Sektor Jasa Keuangan<br><br>Regulation of the Financial Services Authority Number 22 of 2023 concerning Consumer and Public Protection in the Financial Services Sector | PT. Bank Sinarmas Tbk. telah membentuk unit kerja Pelindungan Konsumen dan membuat ketentuan internal mengenai pelindungan konsumen.<br><br>PT. Bank Sinarmas Tbk. has established a Consumer Protection unit and formulated internal regulations regarding consumer protection. |
| 10 | Peraturan Anggota Dewan Gubernur Nomor 4 Tahun 2024 tentang Perubahan atas Peraturan Anggota Dewan Gubernur Nomor 11 Tahun 2023 tentang Peraturan Pelaksanaan Kebijakan Insentif Likuiditas Makroprudensial<br><br>Regulation of the Member of the Board of Governors Number 4 of 2024 concerning Amendments to the Regulation of the Member of the Board of Governors Number 11 of 2023 on the Implementation Guidelines for the Macroprudential Liquidity Incentive Policy | Ketentuan ini mengatur tentang Total insentif Giro Wajib Minimum (GWM) maksimum yang didapat Bank dalam hal Bank menyalurkan pembiayaan kepada sektor prioritas tertentu, pembiayaan hijau, dan pembiayaan inklusif.<br><br>Berdasarkan ketentuan ini PT. Bank Sinarmas Tbk. telah mendapatkan insentif GWM periode 1 Juni sampai dengan 31 Desember 2024<br><br>The related regulation governs the maximum total incentives for Minimum Statutory Reserves (GWM) that the Bank can receive when disbursing financing to certain priority sectors, green financing, and inclusive financing.<br><br>Based on this regulation, PT. Bank Sinarmas Tbk. has obtained GWM incentives for the period from June 1 to December 31, 2024. |
| 11 | Keputusan Menteri Keuangan Republik Indonesia Nomor 188 Tahun 2024 tentang Penyelesaian Kewajiban Pembayaran atas Pelaksanaan Tambahan Subsidi Bunga/ Subsidi Marjin Kredit Usaha Rakyat<br><br>Decree of the Minister of Finance of the Republic of Indonesia Number 188 of 2024 concerning Settlement of Payment Obligations for the Additional Subsidized Interest/Subsidized Margin on People's Business Credit (KUR) | PT. Bank Sinarmas Tbk. memastikan bahwa penagihan subsidi bunga sudah sesuai dengan portofolio debitur yang layak ditagihkan agar tidak terjadi kelebihan klaim penagihan yang berpotensi ditolak atau berpotensi dilakukan pemeriksaan jika sudah dicairkan.<br><br>PT. Bank Sinarmas Tbk. ensures that the interest subsidy claims are consistent with the eligible debtor portfolio to prevent overclaims that could either be rejected or subjected to post-disbursement inspection. |
| 12 | Peraturan Pemerintah Nomor 22 Tahun 2024 tentang Perlakuan Pajak Penghasilan atas Penghasilan dari Penempatan Devisa Hasil Ekspor Sumber Daya Alam (DHE SDA) Pada Instrumen Moneter dan/atau Instrumen Keuangan Tertentu Di Indonesia<br><br>Government Regulation Number 22 of 2024 concerning Income Tax Treatment on Income from the Placement of Foreign Exchange Export Proceeds from Natural Resources (DHE SDA) in Monetary and/or Certain Financial Instruments in Indonesia | PT Bank Sinarmas saat ini dalam proses penyesuaian ketentuan internal terkait DHE SDA<br><br>PT. Bank Sinarmas Tbk. is currently in the process of adjusting its internal policies related to Export Proceeds from Natural Resources (DHE SDA). |
| 13 | Peraturan Bank Indonesia Nomor 3 Tahun 2024 tentang Lembaga Alternatif Penyelesaian Sengketa<br><br>Regulation of Bank Indonesia Number 3 of 2024 concerning Alternative Dispute Resolution Institutions | PT. Bank Sinarmas Tbk. telah menginformasikan kepada unit kerja terkait untuk diperhatikan ketika bank akan melakukan perjanjian dengan nasabah.<br><br>PT. Bank Sinarmas Tbk. has informed relevant work units to pay attention when entering into agreements with customers. |
| 14 | Surat Edaran Otoritas Jasa Keuangan Nomor 29/SEOJK.03/2022 tentang Ketahanan dan Keamanan Siber bagi Bank Umum<br><br>Circular Letter of the Financial Services Authority Number 29/SEOJK.03/2022 concerning Cyber Resilience and Security for Commercial Banks | PT. Bank Sinarmas Tbk. memiliki kewajiban pelaporan terkait Laporan Insiden Siber, kewajiban penilaian risiko inheren keamaan siber, serta melakukan dan melaporkan uji keamanan siber berdasarkan skenario dan kerentanan. Laporan dimaksud disampaikan kepada OJK sesuai periode laporan.<br><br>PT. Bank Sinarmas Tbk. is obligated to report Cyber Incident Reports, assess inherent cyber security risks, and conduct and report cyber security testing based on specific scenarios and vulnerabilities, with reports submitted to OJK according to the applicable reporting periods. |

| No. | Regulasi<br>Regulation | Dampak Bagi Bank dan Tindak Lanjut Bank Sinarmas<br>Impact to the Bank and Bank Sinarmas Follow-Up |
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| 15 | Peraturan Menteri Koordinator Bidang Perekonomian Nomor 7 Tahun 2024 tentang Perubahan Kedua atas Peraturan Menteri Koordinator Bidang Perekonomian Nomor 1 Tahun 2022 tentang Pedoman Pelaksanaan Kredit Usaha Rakyat<br><br>Regulation of the Coordinating Minister for Economic Affairs Number 7 of 2024 concerning the Second Amendment to Regulation of the Coordinating Minister for Economic Affairs Number 1 of 2022 on Guidelines for the Implementation of People's Business Credit (KUR) | PT. Bank Sinarmas Tbk. telah menyampaikan Laporan KUR dan Realisasi SBDK KUR secara tepat waktu kepada kebijakan pembiayaan bagi Usaha Mikro, Kecil dan Menengah secara berkala setiap bulan, paling lama tanggal 10 bulan berikutnya. Serta telah memperhatikan penetapan bunga KUR dengan memperhatikan urutan akses KUR.<br><br>PT. Bank Sinarmas Tbk. has submitted KUR (People's Business Credit) Reports and Prime Lending Rate (SBDK) Realization Reports in a timely manner to the financing policy body for Micro, Small, and Medium Enterprises on a monthly basis, no later than the 10th of the following month, while also considering the prioritization order for KUR access. |
| 16 | Peraturan Bank Indonesia Nomor 6 Tahun 2024 tentang Pasar Uang dan Pasar Valuta Asing<br><br>Regulation of Bank Indonesia Number 6 of 2024 concerning the Money Market and Foreign Exchange Market | PT. Bank Sinarmas Tbk. telah menginformasikan kepada unit kerja untuk menyesuaikan ketentuan internal terkait Pasar Uang dan Pasar Valuta Asing<br><br>PT. Bank Sinarmas Tbk. has informed work units to adjust internal policies related to the Money Market and Foreign Exchange Market. |
| 17 | Peraturan Anggota Dewan Gubernur Nomor 5 Tahun 2024 tentang Perubahan atas Peraturan Anggota Dewan Gubernur Nomor 21/12/PADG/2019 tentang Penyelenggaraan Transfer Dana dan Kliring Berjadwal Oleh Bank Indonesia<br><br>Regulation of the Member of the Board of Governors Number 5 of 2024 concerning Amendments to the Regulation of the Member of the Board of Governors Number 21/12/PADG/2019 on the Organization of Fund Transfers and Scheduled Clearing by Bank Indonesia | PT. Bank Sinarmas Tbk. telah menginformasikan kepada unit kerja untuk menyesuaikan ketentuan internal terkait Pasar Uang dan Pasar Valuta Asing<br><br>PT. Bank Sinarmas Tbk. has informed work units to adjust internal policies related to the Money Market and Foreign Exchange Market. |
| 18 | Peraturan Bank Indonesia Nomor 5 Tahun 2024 tentang Standarisasi Kompetensi di Bidang Sistem Pembayaran<br>Regulation of Bank Indonesia Number 5 of 2024 concerning Competency Standardization in the Payment Systems Sector | PT. Bank Sinarmas Tbk. telah menyampaikan laporan Standarisasi Kompetensi Sistem Pembayaran secara konsisten kepada Bank Indonesia<br>PT. Bank Sinarmas Tbk. has consistently submitted Payment System Competency Standardization reports to Bank Indonesia. |
| 19 | Peraturan Otoritas Jasa Keuangan Nomor 12 Tahun 2024 tentang Penerapan Strategi Anti Fraud Bagi Lembaga Jasa Keuangan<br><br>Regulation of the Financial Services Authority Number 12 of 2024 concerning the Implementation of Anti-Fraud Strategies by Financial Services Institutions | PT. Bank Sinarmas Tbk. telah melakukan Penerapan Strategi Anti Fraud Bagi Lembaga Jasa Keuangan.<br><br>PT. Bank Sinarmas Tbk. has implemented Anti-Fraud Strategies for Financial Service Institutions. |
| 20 | Peraturan Otoritas Jasa Keuangan Nomor 11 Tahun 2024 tentang Perubahan Kedua atas Peraturan Otoritas Jasa Keuangan Nomor 18/POJK.03/2017 tentang Pelaporan dan Permintaan Informasi Debitur Melalui Sistem Layanan Informasi Keuangan (POJK SLIK)<br><br>Regulation of the Financial Services Authority Number 11 of 2024 concerning the Second Amendment to the Financial Services Authority Regulation Number 18/POJK.03/2017 on Debtor Reporting and Information Requests through the Financial Information Service System (POJK SLIK) | PT. Bank Sinarmas Tbk. perlu menyesuaikan laporan debitur terkait dengan penyaluran kredit yang dijaminan oleh perusahaan penjamin dan asuransi, serta penyaluran kredit yang bekerjasama dengan Penyelenggara Layanan Pendanaan Bersama Berbasis Teknologi Informasi (LPBBTI)<br><br>PT. Bank Sinarmas Tbk. needs to adjust debtor reporting related to credit disbursements guaranteed by guarantor companies and insurance companies, as well as credit disbursements in cooperation with Peer-to-Peer (P2P) Lending Providers. |

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| 21 | Peraturan Menteri Keuangan (PMK) Nomor 47 Tahun 2024 tentang Perubahan Ketiga atas PMK Nomor 70/PMK.03/2017 tentang Petunjuk Teknis Mengenai Akses Informasi Keuangan Untuk Kepentingan Bersama<br><br>Regulation of the Minister of Finance (PMK) Number 47 of 2024 concerning the Third Amendment to PMK Number 70/PMK.03/2017 on Technical Guidelines Regarding the Access to Financial Information for Common Interests | PT. Bank Sinarmas Tbk. telah menyesuaikan ketentuan internal terkait akses informasi keuangan untuk kepentingan bersama.<br><br>PT. Bank Sinarmas Tbk. has adjusted internal policies concerning financial information access for shared interests. |
| 22 | Peraturan Anggota Dewan Gubernur Nomor 8 Tahun 2024 tentang Perubahan Keenam atas Peraturan Anggota Dewan Gubernur Nomor 20/15/PADG/2018 tentang Penyelenggaraan Setelmen Dana Seketika melalui Sistem Bank Indonesia–Real Time Gross Settlement<br><br>Regulation of the Member of the Board of Governors Number 8 of 2024 concerning the Sixth Amendment to the Regulation of the Member of the Board of Governors Number 20/15/PADG/2018 on the Organization of Instant Fund Settlement through the Bank Indonesia–Real Time Gross Settlement System | PT. Bank Sinarmas Tbk. telah menyesuaikan ketentuan internal terkait Penyelenggaraan Setelmen Dana Seketika Melalui Sistem Bank Indonesia–Real Time Gross Settlement<br><br>PT. Bank Sinarmas Tbk. has adjusted internal policies related to the Instant Fund Settlement through the Bank Indonesia–Real Time Gross Settlement System. |
| 23 | Peraturan Anggota Dewan Gubernur Nomor 7 Tahun 2024 tentang Peraturan Pelaksanaan Rasio Pendanaan Luar Negeri Bank<br><br>Regulation of the Member of the Board of Governors Number 7 of 2024 concerning Implementation Regulations for Banks' External Funding Ratio | PT. Bank Sinarmas Tbk. telah menginformasikan kepada unit kerja untuk menyesuaikan pelaksanaan ketentuan baru mengenai Rasio Pendanaan Luar Negeri Bank.<br><br>PT. Bank Sinarmas Tbk. has informed work units to implement the new provisions on the Bank's Offshore Funding Ratio. |
| 24 | Peraturan Anggota Dewan Gubernur Nomor 6 Tahun 2024 tentang Perubahan atas Peraturan Anggota Dewan Gubernur Nomor 4 Tahun 2023 tentang Devisa Hasil Ekspor dan Devisa Pembayaran Impor<br><br>Regulation of the Member of the Board of Governors Number 6 of 2024 concerning Amendments to the Regulation of the Member of the Board of Governors Number 4 of 2023 on Export Proceeds and Import Payment Foreign Exchange | PT. Bank Sinarmas Tbk. telah menginformasikan kepada seluruh unit kerja terkait untuk menyesuaikan ketentuan internal mengenai Devisa Hasil Ekspor dan Devisa Pembayaran Impor<br><br>PT. Bank Sinarmas Tbk. has informed all relevant work units to adjust internal policies concerning Export Proceeds and Import Payment Foreign Exchange. |
| 25 | Peraturan Otoritas Jasa Keuangan Nomor 13 Tahun 2024 tentang Transparansi dan Publikasi Suku Bunga Kredit Bagi Bank Umum Konvensional<br><br>Regulation of the Financial Services Authority Number 13 of 2024 concerning Transparency and Publication of Loan Interest Rates for Conventional Commercial Banks | PT. Bank Sinarmas Tbk. telah memperbaharui kebijakan internal yang dimiliki saat ini, serta melakukan pelaporan SBDK kepada OJK sesuai ketentuan yang berlaku.<br><br>PT. Bank Sinarmas Tbk. has updated its current internal policies and reported Prime Lending Rates (SBDK) to OJK in compliance with prevailing regulations. |
| 26 | Peraturan Lembaga Penjamin Simpanan Nomor 1 Tahun 2024 tentang Premi Program Restrukturisasi Perbankan<br>Regulation of the Indonesia Deposit Insurance Corporation Number 1 of 2024 concerning Premiums for the Banking Restructuring Program | PT. Bank Sinarmas Tbk. telah menyesuaikan ketentuan internal mengenai Premi Program Restrukturisasi Perbankan<br>PT. Bank Sinarmas Tbk. has adjusted internal policies regarding the Banking Restructuring Program Premium. |
| 27 | Peraturan Anggota Dewan Gubernur No 11 Tahun 2024 tentang Transaksi Pasar Valuta Asing<br><br>Regulation of the Member of the Board of Governors Number 11 of 2024 concerning Foreign Exchange Market Transactions | PT. Bank Sinarmas Tbk. telah menyesuaikan ketentuan internal terkait transaksi Pasar Valuta Asing.<br><br>PT. Bank Sinarmas Tbk. has adjusted internal policies related to Foreign Exchange Market transactions. |

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| 28 | Keputusan Menteri Keuangan Republik Indonesia Nomor 338 Tahun 2024 tentang Perubahan atas Keputusan Menteri Keuangan Republik Indonesia Nomor 317 Tahun 2024 tentang Besaran Subsidi Bunga/ Subsidi Marjin Kredit Usaha Rakyat<br><br>Decree of the Minister of Finance of the Republic of Indonesia Number 338 of 2024 concerning Amendments to the Decree of the Minister of Finance of the Republic of Indonesia Number 317 of 2024 on the Amount of Interest Subsidy/Margin Subsidy for People's Business Credit (KUR) | PT. Bank Sinarmas Tbk. telah melakukan penyesuaian ketentuan internal mengenai besaran subsidi bunga KUR sesuai dengan Keputusan Menteri Keuangan Republik Indonesia Nomor 388 tahun 2024 tentang Perubahan atas Keputusan Menteri Keuangan Republik Indonesia Nomor 317 Tahun 2024 tentang Besaran Subsidi Bunga/Subsidi Marjin Kredit Usaha Rakyat<br><br>PT. Bank Sinarmas Tbk. has adjusted internal policies concerning the amount of KUR interest subsidies, following the Decree of the Minister of Finance of the Republic of Indonesia Number 388 of 2024 on the Amendment to Decree Number 317 of 2024 regarding the Amount of Interest Subsidy/Margin Subsidy for People's Business Credit. |
| 29 | Peraturan Anggota Dewan Gubernur Nomor 19 Tahun 2024 tentang Perubahan Keenam atas Peraturan Anggota Dewan Gubernur Nomor 21/25/APDG/2019 tentang Rasio Loan To Value untuk Kredit Properti, Rasio *Financing To Value* untuk Pembiayaan Properti, dan Uang Muka untuk Kredit atau Pembiayaan Kendaraan Bermotor<br><br>Regulation of the Member of the Board of Governors Number 19 of 2024 concerning the Sixth Amendment to the Regulation of the Member of the Board of Governors Number 21/25/APDG/2019 on Loan to Value Ratio for Property Loans, Financing to Value Ratio for Property Financing, and Down Payment for Vehicle Loans or Financing | Melalui ketentuan ini Bank Indonesia melanjutkan pelonggaran ketentuan Rasio *Loan to Value* (LTV) untuk Kredit Properti dan Uang Muka untuk Kredit Kendaraan Bermotor sampai dengan 31 Desember 2025.<br><br>Atas ketentuan ini Bank Sinarmas telah melakukan pengkinian kebijakan internal serta memastikan penerapan ketentuan LTV dan Uang Muka tersebut dalam pemberian kredit kepada debitur.<br><br>Under this provision, Bank Indonesia has extended the relaxation of Loan-to-Value (LTV) ratios for Property Loans and Down Payments for Vehicle Loans until December 31, 2025.<br><br>In response to this regulation, Bank Sinarmas has updated its internal policies and ensured the application of the LTV and Down Payment provisions when extending credit to debtors. |
| 30 | Peraturan Anggota Dewan Gubernur No 14 Tahun 2024 tentang Perubahan Kedua atas Peraturan Anggota Dewan Gubernur Nomor 22/20/PADG/2020 tentang Penyelesaian Transaksi Bilateral Indonesia dan Jepang Menggunakan Rupiah dan Yen Melalui Bank<br><br>Regulation of the Member of the Board of Governors Number 14 of 2024 concerning the Second Amendment to the Regulation of the Member of the Board of Governors Number 22/20/PADG/2020 on Bilateral Transaction Settlements between Indonesia and Japan Using Rupiah and Yen through Banks | PT. Bank Sinarmas Tbk. telah menginformasikan kepada unit kerja terkait untuk diperhatikan ketika bank akan menerapkan transaksi bilateral dengan Jepang.<br><br>PT. Bank Sinarmas Tbk. has informed relevant work units to take into account new requirements when engaging in bilateral transactions with Japan. |
| 31 | Peraturan Anggota Dewan Gubernur No 15 Tahun 2024 tentang Perubahan atas Peraturan Anggota Dewan Gubernur Nomor 23/16/PADG/2021 tentang Penyelesaian Transaksi Bilateral antara Indonesia dan Tiongkok menggunakan Rupiah dan Yuan melalui Bank<br><br>Regulation of the Member of the Board of Governors Number 15 of 2024 concerning Amendments to the Regulation of the Member of the Board of Governors Number 23/16/PADG/2021 on Bilateral Transaction Settlements between Indonesia and China Using Rupiah and Yuan through Banks | PT. Bank Sinarmas Tbk. telah menginformasikan kepada unit kerja terkait untuk menyesuaikan ketentuan internal dan pelaksanaan transaksi bilateral dengan Tiongkok.<br><br>PT. Bank Sinarmas Tbk. has informed relevant work units to adjust internal policies and practices related to bilateral transactions with China. |
| 32 | Peraturan Anggota Dewan Gubernur No 13 Tahun 2024 tentang Transaksi Pasar Uang<br><br>Regulation of the Member of the Board of Governors Number 13 of 2024 concerning Money Market Transactions | PT. Bank Sinarmas Tbk. telah menginformasikan kepada unit kerja terkait untuk menyesuaikan ketentuan internal terkait transaksi Pasar Uang.<br><br>PT. Bank Sinarmas Tbk. has informed relevant work units to adjust internal policies related to Money Market transactions. |

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| 33 | Peraturan Otoritas Jasa Keuangan Nomor 5 tahun 2024 tentang Penetapan Status Pengawasan dan Penanganan Permasalahan Bank Umum<br><br>Financial Services Authority Regulation No. 5 of 2024 concerning Determination of Supervisory Status and Handling of Commercial Bank Problems | Bank wajib menyusun dan menyampaikan Rencana Aksi Pemulihan (Recovery Plan) kepada Otoritas Jasa Keuangan. Pada tahun 2025 Bank melakukan Rapat Pemegang Saham (RUPS) untuk meminta persetujuan pemegang saham terhadap laporan rencana aksi pemulihan tahun 2024.<br><br>The Bank is required to prepare and submit a Recovery Plan to the Financial Services Authority. In 2025, the Bank will hold a Shareholders Meeting (GMS) to seek shareholder approval of the 2024 recovery action plan report. |
| 34 | Peraturan Otoritas Jasa Keuangan Nomor 15 tahun 2024 tentang Integritas Pelaporan Keuangan Bank<br><br>Financial Services Authority Regulation No. 15 of 2024 on Bank Financial Reporting Integrity | Bank wajib mmemiliki proses pelaporan keuangan yang berintegritas untuk memastikan kebenaran, keakuratan, serta transparansi informasi keuangan dan laporan keuangan yang dihasilkan.<br><br>Banks are required to have a financial reporting process with integrity to ensure the truth, accuracy, and transparency of financial information and the resulting financial statements. |



## PERUBAHAN KEBIJAKAN AKUNTANSI

### Perubahan Pernyataan Standar Akuntansi Keuangan (PSAK)

Penerapan standar akuntansi keuangan yang berlaku efektif 1 Januari 2025 tidak menyebabkan perubahan signifikan atas kebijakan akuntansi Bank dan tidak berdampak material terhadap jumlah-jumlah yang dilaporkan dalam laporan keuangan tahun berjalan sebagai berikut:

Penerapan pada tahun 2025
- Amandemen PSAK No. 117, "Kontrak Asuransi"
- Amendemen PSAK No. 221. "Pengaruh Perubahan Kurs Valuta Asing

Sampai dengan tanggal penerbitan laporan keuangan, Bank masih mempelajari dampak yang mungkin timbul dari penerapan amendemen PSAK tersebut dan dampak tersebut pada laporan keuangan belum dapat ditentukan.

## INFORMASI KELANGSUNGAN USAHA

### Hal-hal yang Berpotensi Berpengaruh Signifikan terhadap Kelangsungan Usaha Perusahaan

Potensi ancaman terhadap kelangsungan usaha Bank Sinarmas dapat berasal dari gangguan atau bencana yang disebabkan oleh berbagai faktor baik dari internal maupun eksternal seperti kegagalan proses bisnis, *fraud* internal, bencana alam, disrupsi teknologi, kondisi politik maupun makro ekonomi.

Sektor perbankan Indonesia menunjukkan ketahanan yang solid memasuki awal 2025, dengan kinerja intermediasi yang tetap kuat meskipun mengalami sedikit perlambatan. Menurut data Bank Indonesia, pertumbuhan kredit perbankan mencapai 10,3% secara tahunan (*year-on-year*/YoY) pada Februari 2025, sedikit menurun dibandingkan dengan 10,39% pada Desember 2024. Pertumbuhan ini didorong oleh permintaan dari segmen korporasi yang masih tumbuh positif, meskipun

## CHANGES IN ACCOUNTING POLICY

### Changes to the Statements of Financial Accounting Standards (SFAS)

The implementation of the revised financial accounting standards of Bank Sinarmas is effective on January 1, 2025 did not cause significant changes to the Bank's accounting policies and had no material impact on the amounts reported in the current year's financial statements as follows:

Implementation in 2025
- Amendment to SFAS No. 117, "Insurance Contracts"
- Amendment to SFAS No. 221. "Impact on Changes in Foreign Currency"

As at the date of authorization of these financial statements, the Bank is still evaluating the potential impact of the above amendments to SFAS and has not yet determined the related effects on the financial statements.

## BUSINESS CONTINUITY INFORMATION

### Matters that have the Potential to Significantly Influence on the Continuity of the Company's Business

Potential threats to Bank Sinarmas' business continuity can come from disruptions or disasters caused by various factors, both internal and external, such as business process failures, internal fraud, natural disasters, technological disruption, political and macroeconomic conditions.

Into early 2025, the Indonesian banking sector showed solid resilience with intermediation performance remaining strong despite a slight slowdown. According to Bank Indonesia data, banking credit growth reached 10.3% year-on-year (YoY) in February 2025, slightly down compared to 10.39% in December 2024. This growth was driven by demand from the corporate segment which was still growing positively, although household consumption tended to be limited. In

konsumsi rumah tangga cenderung terbatas. Dari sisi risiko kredit, rasio kredit bermasalah (*Non-Performing Loan*/NPL) *gross* menurun menjadi 2,20% pada akhir 2024, sementara NPL net stabil di angka 0,77%, mencerminkan kualitas aset yang terjaga. Likuiditas perbankan juga tetap memadai, dengan rasio alat likuid terhadap dana pihak ketiga (AL/DPK) tercatat sebesar 26,03% pada Januari 2025, meningkat dari 25,59% pada Desember 2024. Bank Indonesia memproyeksikan pertumbuhan kredit pada 2025 berada dalam kisaran 11–13%, sejalan dengan prospek pertumbuhan ekonomi yang tetap baik dan dukungan kebijakan makroprudensial. Dengan kondisi ini, sektor perbankan diharapkan terus berkontribusi positif terhadap perekonomian nasional.

terms of credit risk, the gross non-performing loan (NPL) ratio decreased to 2.20% at the end of 2024, while net NPL was stable at 0.77%, reflecting maintained asset quality. Banking liquidity also remained adequate, with the ratio of liquid assets to third party funds (AL/TPF) recorded at 26.03% in January 2025, increasing from 25.59% in December 2024. Bank Indonesia projects credit growth in 2025 to be in the range of 11–13%, in line with the strong putlook of economic growth and continued support from macroprudential policies. With this condition, the banking sector shall continue to contribute positively to the national economy.

Terkait kondisi tersebut, Bank Sinarmas telah mengambil langkah untuk menjaga kinerja Bank agar tetap resilien dengan melibatkan seluruh lapisan stakeholder Bank antara lain Direksi & Komisaris, Komite-Komite, berbagai unit kerja terkait yang merupakan bagian dari *Three Lines Model* yaitu Unit Bisnis, *Compliance, Risk Management Group*, dan *Internal Audit* dalam kegiatan usaha. Dari sisi *Risk Management Group* merupakan pihak independen terhadap satuan kerja operasional (*risk taking unit*) dan satuan kerja fungsi pengendalian intern. *Risk Management Group* menjadi *business partner* bagi unit-unit kerja terkait lainnya, terutama dalam strategi pengelolaan risiko yang berdampak pada keberlangsungan usaha Bank.

Related to these conditions, Bank Sinarmas has taken steps to maintain the Bank's performance to remain resilient by involving all layers of the Bank's stakeholders, including the Board of Directors & Commissioners, Committees, various related work units that are part of the Three Lines Model, namely Business Unit, Compliance, Risk Management Group, and Internal Audit in business activities. The Risk Management Group is an independent party to the operational work unit (risk taking unit) and the internal control function work unit. Risk Management Group becomes a business partner for other related work units, especially in risk management strategies that affect the Bank's business continuity.

Berikut ini beberapa strategi dalam pengelolaan risiko bank.

1. Pengawasan Aktif Dewan Komisaris dan Direksi baik secara langsung maupun melalui Komite-Komite. Komisaris dan Direksi (Manajemen) mampu melakukan pengawasan secara aktif terhadap pelaksanaan kebijakan dan strategi manajemen risiko, dilakukan antara lain: tugas pengawasan Direksi dibantu oleh Komite Manajemen Risiko dan Komite Kebijakan Kredit melalui pelaksanaan rapat Komite Manajemen Risiko dan Komite Kebijakan Kredit serta Pengawasan Dewan Komisaris dibantu oleh Komite Pemantau Risiko melalui pelaksanaan rapat Komite Pemantau Risiko.
2. Kecukupan kebijakan, prosedur, penetapan limit, dan kaji ulang. Bank terus berupaya untuk mengembangkan, memelihara dan memantau kebijakan, prosedur dan limit manajemen risiko agar dilaksanakan sesuai dengan strategi bisnis, karakteristik dan kompleksitas kegiatan usaha Bank, *risk appetite*, *risk tolerance,* serta ketentuan yang ditetapkan oleh otoritas dan/atau praktik perbankan yang sehat. Hal ini antara lain dilakukan melalui penyusunan dan kaji ulang beberapa kebijakan, penetapan dan kaji ulang limit *risk appetite* dan *risk tolerance* untuk risiko yang dominan bagi bank antara lain risiko kredit, risiko pasar, risiko likuiditas, dan risiko operasional.
3. Kecukupan proses identifikasi, pemantauan, pengukuran dan pengendalian risiko antara lain dilakukan dengan cara:

Here are some strategies in managing bank risk.

1. Active Supervision of the Board of Commissioners and the Board of Directors either directly or through Committees.The Board of Commissioners and the Board of Directors (Management) are able to actively supervise the implementation of risk management policies and strategies, among others: the supervisory duties of the Board of Directors are assisted by the Risk Management Committee and the Credit Policy Committee through the implementation of the Risk Management Committee and Credit Policy Committee meetings and the Board of Commissioners Supervision is assisted by the Risk Monitoring Committee through the implementation of Risk Monitoring Committee meetings.
2. Adequacy of policies, procedures, limit setting, and review. The Bank will continue to strive to develop, maintain and monitor risk management policies, procedures and limits so that they are implemented in accordance with the business strategy, characteristics and complexity of the Bank's business activities, risk appetite, risk tolerance, and provisions set by the authorities and/or healthy banking practices. This is done, among others, through the preparation and review of several policies, determination and review of risk appetite and risk tolerance limits for dominant risks for the bank, including credit risk, market risk, liquidity risk, and operational risk.
3. Adequacy of the risk identification, monitoring, measurement and control process is carried out, among others, by:

a. Mengembangkan dan menerapkan metodologi, prosedur, dan perangkat untuk identifikasi, pengukuran, pemantauan dan pengendalian risiko yang timbul dari seluruh produk/aktivitas bank sesuai dengan strategi, *risk appetite*, dan kompleksitas usaha Bank;
b. Menganalisis potensi kerugian dari aktivitas dan produk bank serta dampaknya terhadap profil risiko dan permodalan Bank;
c. Memberikan rekomendasi kepada *risk taking unit*, unit pendukung, dan/atau komite atas proposal yang diajukan sesuai kewenangan yang dimiliki dimana dituangkan dalam Telaah Risiko dan Kajian Risiko;
d. Melakukan simulasi dan/atau *stress testing* untuk melengkapi sistem pengukuran risiko dengan memperkirakan penggunaan limit dan potensi kerugian Bank pada kondisi pasar yang tidak normal dengan menggunakan skenario tertentu untuk melihat sensitivitas kinerja Bank terhadap perubahan faktor risiko dan mengidentifikasi faktor yang berdampak signifikan terhadap portofolio Bank;
e. Menetapkan dan mengkaji ulang secara berkala metodologi dalam proses identifikasi dan pengukuran risiko;
f. Pemantauan posisi risiko Bank secara keseluruhan (*composite*), maupun per masing-masing jenis risiko dan per jenis aktifitas fungsional terhadap *risk appetite* dan *risk tolerance* yang ditetapkan; dan
g. Penilaian secara berkala terhadap penilaian sendiri (*self assesment*) Untuk Profil Risiko Bank secara Individu dan Konsolidasi dengan Perusahaan Anak, Laporan Tingkat Kesehatan Bank, Laporan ICAAP Bank, Laporan Profil Risiko Terintegrasi Konglomerasi Keuangan Sinarmas, Laporan Kewajiban Penyediaan Modal Minimum Terintegrasi Konglomerasi Keuangan Sinarmas dan Laporan Rencana Aksi Pemulihan.

4. Menyampaikan informasi risiko yang efektif sesuai dengan karakteristik dan kompleksitas kegiatan usaha dan profil risiko bank guna membantu Direksi, Dewan Komisaris, Komite Manajemen Risiko, dan Komite Pemantauan Risiko dalam mengelola risiko, memperkuat aspek pengendalian risiko, dan melindungi kepentingan Pemegang Saham.
5. Kecukupan kompetensi sumber daya manusia, antara lain dengan memastikan struktur organisasi dan kecukupan sumber daya manusia *Risk Management Group* memadai sesuai dengan ukuran dan kompleksitas usaha. Menetapkan tugas dan tanggung jawab yang jelas pada masing-masing divisi sesuai karakteristik dan profil risiko bank, serta memastikan kecukupan kompetensi guna mendukung penerapan manajemen risiko secara efektif.
6. Implementasi Budaya Sadar Risiko dilaksanakan untuk mendorong pemilik risiko di seluruh jenjang organisasi Bank agar meningkatkan budaya kesadaran risiko (*Risk Awareness Campaign Program*) melalui berbagai media, antara lain email, diskusi kelompok, GMeet, sosialisasi atau pelatihan di ruang kelas atau *e-learning, Key Risk Indicator*, dan *Risk Control Self-Assessment*.

a. Developing and implementing methodologies, procedures, and tools for identification, measurement, monitoring, and control of risks arising from all bank products/activities in accordance with the Bank's strategy, risk appetite, and business complexity;
b. Analyzing potential losses from bank activities and products and their impact on the Bank's risk profile and capital;
c. Providing recommendations to risk taking units, supporting units, and/or committees on proposals submitted in accordance with the authority held, outlined in the Risk Review and Risk Assessment;
d. Conducting simulations and/or stress testing to complete the risk measurement system by estimating the use of limits and potential losses of the Bank in abnormal market conditions using certain scenarios to see the sensitivity of the Bank's performance to changes in risk factors and identify factors that have a significant impact on the Bank's portfolio;
e. Establishing and reviewing on a regular basis the methodology in the process of risk identification and measurement;
f. Monitoring the Bank's overall (composite) risk position, as well as per each type of risk and per type of functional activity against the established risk appetite and risk tolerance; and.
g. Periodic assessment of self-assessment for the Bank's Risk Profile Individually and Consolidated with Subsidiaries, Bank Health Level Report, Bank ICAAP Report, Sinarmas Financial Conglomeration Integrated Risk Profile Report, Sinarmas Financial Conglomeration Integrated Minimum Capital Adequacy Report and Recovery Action Plan Report.

4. Delivering effective risk information in accordance with the characteristics and complexity of business activities and the bank's risk profile to assist the Board of Directors, Board of Commissioners, Risk Management Committee, and Risk Monitoring Committee in managing risks, strengthening risk control aspects, and protecting the interests of Shareholders.
5. Adequate human resource competency, including by ensuring the organizational structure and adequacy of human resources in the Risk Management Group are adequate according to the size and complexity of the business. Establishing clear duties and responsibilities for each division according to the characteristics and risk profile of the bank, and ensuring adequacy of competency to support the implementation of risk management effectively.
6. The implementation of Risk Awareness Culture is carried out to encourage risk owners at all levels of the Bank's organization to improve risk awareness culture (Risk Awareness Campaign Program) through various media, including email, group discussions, GMeet, socialization or classroom training or e-learning, Key Risk Indicators, and Risk Control Self-Assessment.

## *Assessment* Manajemen atas Masalah Tersebut

Bank melaksanakan restrukturisasi dan menyalurkan kredit secara lebih selektif serta mengedepankan prinsip kehati-hatian kepada nasabah. Bank senantiasa menjaga kecukupan likuiditas pada level yang memadai sehingga aktivitas operasional dan bisnis dapat berjalan dengan lancar serta permodalan yang sangat memadai sebagai antisipasi untuk menyerap kemungkinan risiko yang mungkin terjadi. Sesuai ketentuan pelaksanaan tata kelola perusahaan yang baik, Bank melakukan *self-assessment* untuk mengukur profil risiko dan tingkat Kesehatan Bank.

Berdasarkan hasil *self-assessment* posisi 31 Desember 2024, dinilai bahwa Tingkat Kesehatan Bank berada di peringkat 2 (dua) atau "Sehat" dengan penilaian Profil Risiko secara komposit pada peringkat 2 (dua) atau "*Low to Moderate*". Hal ini menunjukkan Bank mampu melakukan identifikasi, antisipasi, menindaklanjuti sekaligus memitigasi risiko-risiko yang dapat mempengaruhi kesinambungan usaha Bank.

## Asumsi yang Digunakan dalam Melakukan *Assessment*

*Self-assessment* yang dilakukan oleh Bank telah mempertimbangkan, antara lain:

1. Action plan dan/atau upaya perbaikan yang telah dilakukan oleh Bank selama Tahun 2024 antara lain dari sisi perkreditan, treasury, stratejik, kepatuhan maupun operasional Bank;
2. Data Historis yang dimiliki oleh Bank;
3. Ketentuan Regulator;
4. Rencana Bisnis Bank;
5. Benchmark dengan peers Bank serta industri perbankan secara umumnya; serta disesuaikan dengan
6. Risk appetite dan risk tolerance Bank.

Selama tahun 2024, seluruh aktivitas operasional dapat terkendali dan berjalan dengan baik.

## Management Assessment of the Issue

The Bank carries out restructuring and distributes credit more selectively and prioritizes the principle of prudence to customers. The Bank always maintains sufficient liquidity at an adequate level to ensure seamless operational and business activities and adqequate capital as an anticipation to absorb every possible risk as they occur. In accordance with the provisions of good corporate governance, the Bank conducts a self-assessment to measure the risk profile and level of Bank Health.

Based on the self-assessment results for the position of December 31, 2024, the result is that the Bank's health level is at "Rank 2 (two) or "Healthy" with a composite risk profile assessment at rank 2 (two) or "Low to Moderate". This shows that the Bank is able to identify, anticipate, follow up and mitigate risks that can affect the Bank's business continuity.

## Assumptions Used in Conducting the Assessment

The self-assessment conducted by the Bank has considered, among others:

1. Action plans and/or improvement efforts that have been carried out by the Bank during the year 2024, including in the credit, treasury, strategic, compliance and operational aspects of the Bank;
2. Historical data owned by the Bank;
3. Regulatory requirements;
4. Bank's business plan;
5. Benchmark with the Bank's peers and the banking industry in general; and adjusted to
6. Risk appetite and risk tolerance of the Bank.

During 2024, all operational activities were under control and very well run.

| Faktor-faktor Penilaian<br>Assessment Factors | Peringkat<br>Rating | |
|---|---|---|
| | 2024 | 2023 |
| Peringkat TKB Berdasarkan Risiko (*Self Assessment*)<br>Risk-Based Soundess Rating | 2 | 2 |

# TINJAUAN PENDUKUNG BISNIS

## Business Support Review



.05

# SUMBER DAYA MANUSIA
## Human Resources





### PENGEMBANGAN SUMBER DAYA MANUSIA

PT. Bank Sinarmas Tbk. ("Bank Sinarmas" atau "Bank") memandang bahwa sumber daya manusia (SDM) yang mumpuni merupakan bagian yang sangat penting dalam pengembangan kinerja usaha Bank secara berkelanjutan. Bagi Bank Sinarmas, SDM memiliki peran penting dalam mewujudkan tujuan Bank untuk jangka pendek, menengah, maupun panjang serta visi dan misi yang telah ditetapkan.

Karena itu, Bank Sinarmas senantiasa mengembangkan SDM secara terencana dan berkelanjutan. Hal ini dilakukan bukan hanya pada materi pengembangan kompetensi, tetapi juga jenjang jabatan karyawan agar selaras dengan target Bank.

### HUMAN RESOURCE DEVELOPMENT

PT. Bank Sinarmas Tbk. ("Bank Sinarmas" or "Bank") views qualified human resources (HR) as a crucial part in sustainably developing the Bank's business performance. For Bank Sinarmas, the role HR plays is very important in that it helps the Bank meet its short-, medium-, and long-term goals and bring to life its stated vision and mission.

Therefore, Bank Sinarmas always develops HR in a planned and sustainable manner. This is done not only in terms of competency development material but also employee job levels to align with the Bank's targets.

## Organisasi Pengelolaan Sumber Daya Manusia

Bank Sinarmas membentuk *Human Capital Management* (HCM) sebagai organisasi pengelola, baik dalam rangka pembinaan maupun pengembangan SDM. Dalam organisasi HCM terdapat 4 (empat) fungsi utama seperti diuraikan dalam tabel di bawah ini.

## Human Resource Management Organization

Bank Sinarmas formed Human Capital Management (HCM) as a management organization, both in terms of coaching and developing HR. In the HCM organization there are 4 (four) main functions as described in the table below.

| Fungsi Organisasi<br>Organizational Functions | Tugas | Task |
|---|---|---|
| *Human Capital Talent Development* (HCTD) | Mengembangkan strategi pengelolaan SDM melalui pemenuhan kebutuhan SDM, manajemen talenta, pengembangan SDM, dan pengembangan program pelatihan sehingga terciptanya pengelolaan SDM yang efektif. | Develop HR management strategies through meeting HR needs, talent management, HR development, and development of training programs so as to create effective HR management. |
| *Organization Development & Industrial Relations* (ODIR) | Mengembangkan organisasi dan tata kelola SDM yang optimal, serta penanganan atas perselisihan hubungan industrial guna terciptanya lingkungan kerja yang kondusif, SDM yang produktif, serta proses kerja yang optimal dan saling terintegrasi. | Developing optimal HR organization and governance, as well as handling industrial relations disputes to create a conducive work environment, productive human resources, as well as optimal and integrated work processes. |
| *Human Capital Process & Performance Management* (HCPPM) | Mengelola kinerja seluruh karyawan, pengelolaan sistem *reward*, dan pengelolaan data karyawan, sehingga proses kerja optimal dan saling terintegrasi dalam mendukung pencapaian target Bank dengan SDM yang produktif. | Managing all employees' performance, reward system management, and employee data management to ensure optimal and integrated work processes to support the achievement of the Bank's targets with productive human resources. |
| *HCBP, System & Employee Relations* (HCBPSER) | Menyelaraskan tujuan bisnis dengan karyawan dan manajemen (khususnya di ITDE dan bisnis), memperkuat employee experience yang tercermin dalam pengelolaan HCMS, serta menjembatani hubungan antara manajemen dengan karyawan, sehingga meningkatkan efektivitas organisasi dalam menjalankan bisnisnya, baik dalam jangka pendek maupun jangka panjang. | Aligning business objectives with employees and management (especially in ITDE and business), strengthening the employee experience reflected in HCMS management, and bridging the relationship between management and employees, thereby increasing the effectiveness of the organization in running its business, both in the short and long term. |

Keempat fungsi utama tersebut senantiasa bersinergi untuk mendukung pencapaian tujuan organisasi, memastikan ketersediaan SDM yang sesuai dengan kebutuhan, dan mempromosikan pertumbuhan yang berkelanjutan dalam konteks perubahan dinamis di dunia perbankan. Melalui pembagian fungsi dan tugas yang terorganisir dan fokus ini, Bank dapat meningkatkan pengelolaan SDM dengan lebih baik.

These four main functions continuously synergize to support organizational goal achievement, ensure the availability of human resources according to needs, and promote sustainable growth in the dynamic changes of the banking industry. Through this organized and focused division of functions and tasks, the Bank can improve its HR management.

## Kebijakan Strategis 2024

### Rekrutmen

Bank Sinarmas menggunakan 2 (dua) pendekatan dalam melakukan rekrutmen, dengan tujuan dapat merespons perkembangan bisnis Bank yang semakin dinamis. Pendekatan tersebut, yakni:

1. Memberikan kesempatan kepada talenta terbaik di internal Bank untuk mengisi posisi yang dibutuhkan melalui proses promosi atau mutasi jabatan;
2. Melaksanakan rekrutmen eksternal melalui perekrutan *fresh graduate dan pro-hire*, baik di tingkat pelaksana maupun pimpinan.

Bank memastikan bahwa kedua proses tersebut dilakukan secara adil dan transparan, sehingga hanya kandidat terbaik yang terpilih menjadi bagian dari perusahaan. Untuk tahun 2024, strategi pemenuhan SDM yang direalisasikan oleh Bank adalah:

## 2024 Strategic Policies

### Recruitment

Bank Sinarmas applies 2 (two) approaches to conducting recruitment to respond to the increasingly dynamic development of the Bank's business. Here are the approaches:

1. Providing opportunities to the best talents within the internal Bank through promotion or job rotation processes; and
2. Conducting external recruitment through hiring fresh graduates and pro-hires, both at the executive and managerial levels.

The Bank ensures that both processes are carried out fairly and transparently, so that only the best candidates are selected to be part of the Company. The following are the HR fulfillment strategy the Bank executed in 2024:

1. Mengoptimalkan sumber pencarian (sourcing) kandidat baik menggunakan situs web pencari kerja (LinkedIn dan JobStreet), head hunter, job fair, campus hiring, employee, referral dan kerja sama dengan universitas.
2. Memperkuat employer branding secara eksternal dengan lebih aktif di media sosial, seperti Instagram pada account baru life@banksinarmas dan LinkedIn, dengan memberikan konten-konten yang mendidik dan mengarahkan para fresh graduate dalam mencari pekerjaan yang sesuai dengan passion-nya.
3. Merekrut Development Program untuk pemenuhan dan menyiapkan talenta-talenta yang mumpuni di bidang sales sehingga menghasilkan tenaga sales yang kompeten untuk mengisi posisi-posisi pimpinan di cabang ke depannya.
4. Melakukan kerja sama dengan universitas terkemuka melalui program internship di Bank, terutama di bidang information technology (IT), dan Sales & Marketing selaras dengan strategi Bank ke depan.
5. Aktif melakukan kerja sama webinar dengan universitas atau pihak ketiga lainnya dalam sebuah event recruitment.
6. Terus melakukan perbaikan berkelanjutan dalam proses recruitment sehingga membantu optimalisasi dalam penerimaan karyawan baru.
7. Melakukan kerja sama dengan sekolah didik vokasi/ sekolah menengah kejuruan (SMK) yang memiliki penjurusan spesifik, sehingga bisa melakukan program internship yang membantu unit kerja.
8. Mempromosikan career path secara internal dengan penginformasian internal job vacancy yang dapat diakses oleh seluruh karyawan dengan memberikan kesempatan pertama kepada karyawan dan melihat kompetensi yang dimiliki dengan melamar posisi vacant tersebut.
9. Membuka peluang internship bagi disabilitas untuk belajar bekerja di beberapa unit kerja dengan program inclusivity for creative professional.
10. Berpartisipasi dalam berbagai event dan kompetisi untuk memperkuat branding dan juga menambah perluasan sourcing dalam pencarian kandidat ke seluruh kota.

1. Optimizing candidate sourcing channels through the use of job search websites (LinkedIn and JobStreet), headhunters, job fairs, campus hiring, employee referrals, and partnerships with universities.
2. Strengthening external employer branding by becoming more active on social media platforms, such as the newly launched Instagram account life@banksinarmas and LinkedIn, by providing educational content that guides fresh graduates in finding careers aligned with their passions.
3. Recruiting through the Development Program to fulfill and prepare highly capable talents in the field of sales, thereby cultivating proficient sales personnel to fill future leadership positions at branch offices.
4. Establishing collaborations with leading universities through internship programs at the Bank, particularly in the fields of Information Technology (IT) and Sales & Marketing, in line with the Bank's future strategies.
5. Actively conducting webinars in collaboration with universities or third-party institutions as part of recruitment events.
6. Continuously improving the recruitment process to optimize the hiring of new employees.
7. Partnering with vocational schools/vocational high schools (SMK) offering specialized majors to implement internship programs that support operational units.
8. Promoting internal career paths by providing information on internal job vacancies accessible to all employees, giving priority to internal candidates while assessing their competencies for the available positions.
9. Opening internship opportunities for individuals with disabilities through the "Inclusivity for Creative Professionals" program, allowing them to gain work experience in various units.
10. Participating in various events and competitions to strengthen the Bank's branding while expanding sourcing channels to attract candidates from cities across the country.

## Pengembangan Struktur Organisasi

Seiring dengan perkembangan bisnis Bank yang semakin bertumbuh dan dengan semangat untuk selalu memberikan berbagai produk dan layanan yang terbaik bagi nasabah, Bank senantiasa melakukan perbaikan yang berkelanjutan dan inovasi yang diperlukan dalam menjalankan setiap aspek bisnisnya.

Melanjutkan inisiatif strategis Bank yang terkait pemisahan (*spin off*) Unit Usaha Syariah menjadi Bank Nano Syariah, Bank memastikan kelancaran proses operasional perbankan selama masa *sustainability* dengan melakukan beberapa penyesuaian struktur organisasi dan peran/jabatan sejalan dengan strategi yang ditentukan.

## Organizational Structure Development

In line with the Bank's growing business and its commitment to consistently delivering the best products and services to customers, the Bank continuously pursues sustainable improvements and innovations across all aspects of its operations.

Continuing the Bank's strategic initiative related to the spin-off of the Sharia Business Unit into Bank Nano Syariah, and ensuring smooth operation of banking activities during the sustainability period by making several adjustments to its organizational structure and roles/positions in line with the defined strategy.

Bank senantiasa melakukan penyesuaian dan pengembangan yang dibutuhkan pada struktur organisasi untuk memastikan fungsi dan proses yang ada di Bank selaras dengan strategi dan prioritas bisnis Bank.

The Bank consistently undertakes the necessary adjustments and development of its organizational structure to ensure that all functions and processes remain aligned with the Bank's overall business strategies and priorities.

## Tata Kelola Kebijakan dan Prosedur HCM

Sebagai bagian dari upaya dalam penerapan prinsip-prinsip tata kelola perusahaan yang baik (*Good Corporate Governance*/ GCG), setiap karyawan harus mengetahui sekaligus memahami segala ketentuan yang berlaku di Bank Sinarmas. Oleh karena itu, Bank senantiasa melakukan penyegaran (*refreshment*) Kode Etik dan Pedoman Tingkah Laku, serta Peraturan Perusahaan (PP) secara berkala melalui *platform e-learning*.

## HCM Policy and Procedure Governance

As part of the Bank's efforts to implement Good Corporate Governance (GCG) principles, each employee must understand and comprehend the contents of the applicable regulations. As a result, the Bank regularly updates the Code of Ethics and Code of Conduct, as well as the Company Regulations (CR), via e-learning platforms.

Kebijakan *Know Your Employee* diwujudkan melalui serangkaian prosedur komprehensif, mulai dari proses rekrutmen yang melibatkan verifikasi latar belakang menyeluruh, pelatihan berkala tentang etika dan kepatuhan, hingga implementasi sistem pemantauan perilaku karyawan. Selain itu, mekanisme pelaporan pelanggaran yang aman dan independen menjadi bagian tak terpisahkan untuk memastikan kepatuhan dan memitigasi risiko internal, sehingga menjaga stabilitas dan reputasi bank di mata nasabah dan regulator.

The Know Your Employee policy is realized through a series of comprehensive procedures, starting from the recruitment process that involves thorough background verification, periodic training on ethics and compliance, to the implementation of an employee behavior monitoring system. In addition, a secure and independent whistleblowing mechanism is an integral part of ensuring compliance and mitigating internal risks, thereby maintaining the bank's stability and reputation in the eyes of customers and regulators.

Penyesuaian etika dan regulasi di Bank tersebut sebagai upaya menjaga relevansi, kepatuhan, dan kesesuaian Bank dengan norma-norma hukum dan standar industri yang berlaku. Pembaruan tersebut juga dilakukan dengan mempertimbangkan keselarasan dengan Visi, Misi, serta Nilai-nilai Luhur Bank.

The Bank's adjustment of ethics and regulations represents an effort to maintain its relevance, compliance, and conformity with applicable legal norms and industry standards. Updates are made based on the Bank's vision, mission, and noble values.

Di sisi lain, Bank juga berupaya meningkatkan kualitas pengelolaan SDM secara terus-menerus agar sejalan dengan ketentuan dari regulator. Termasuk dalam kegiatan ini, antara lain kajian ulang dalam pengelolaan penerapan sanksi bagi karyawan yang melakukan pelanggaran sesuai dengan Undang-Undang No. 11 tahun 2020 tentang Cipta Kerja berkenaan sanksi indisipliner, yaitu sanksi pertama dan terakhir bagi karyawan yang melakukan jenis pelanggaran tertentu.

On the other hand, the Bank seeks to continuously improve the quality of HR management in order to remain in compliance with the regulator's provisions. Among these activities is a review of the management of the imposition of sanctions for employees proven to have violated Law No. 11 of 2020 concerning Job Creation in terms of disciplinary sanctions, specifically the first and last sanctions for employees who commit certain types of violations.

## Pelatihan dan Pengembangan

## Training and Development

### Kebijakan

Setiap insan Bank Sinarmas memiliki kesempatan yang sama dalam kesempatan mengikuti program pelatihan dan pengembangan. Meskipun demikian, pelaksanaannya senantiasa disesuaikan dengan kebutuhan dan kompetensi karyawan di setiap tingkatan organisasi, dengan tetap memperhatikan isu yang relevan, baik di bidang ekonomi maupun industri serta kondisi internal Bank.

### Policy

Every individual at Bank Sinarmas has equal opportunities to participate in training and development programs. However, the implementation is always adjusted to the needs and competencies of employees at every level of the organization with due consideration of macroeconomic/business issues and the internal conditions of the Bank.

Adapun jenis program pelatihan dan pengembangan yang diselenggarakan Bank, antara lain:

1. Mandatory Training dalam Pemenuhan Kompetensi Manajemen Risiko, Tresuri, Audit, Sistem Pembayaran dan Pengelolaan Uang Rupiah (SPPUR), serta sertifikasi wajib lainnya;

The types of training and development programs organized by the Bank include:

1. Mandatory Training in fulfilling Risk Management Competence, Treasury, Audit, and Payment Systems and Rupiah Currency Management (SPPUR), as well as other mandatory certifications;

2. Fulfillment Program melalui Management Development Program (MDP) dan Information Technology (IT) Graduate Camp dan Data Freshman Camp;
3. Skills Development area Sales dilaksanakan bagi para Frontliners (Customer Service & Sales Officer dan Teller) untuk meningkatkan skills dalam melakukan cross selling produk melalui program Sales Onboarding & Close Every Deals. Selain itu, peningkatan keahlian untuk talenta di bidang IT juga dilaksanakan melalui program pelatihan yang mendukung transformasi teknologi informasi (TI) dan digital, khususnya di area tata kelola IT, product management, IT risk management, dan perlindungan data pribadi.

Seiring dengan kemajuan teknologi, program pelatihan dan pengembangan dilaksanakan secara digital melalui *e-learning*, baik menggunakan *platform* internal maupun eksternal. Oleh karena itu, Bank senantiasa menciptakan konten yang unik dalam bentuk video pembelajaran atau materi interaktif.

Kendati demikian, pelatihan dan pengembangan secara tatap muka tetap dilakukan melalui kerja sama dengan institusi pendidikan, terutama dalam pelatihan yang mendukung program pemerintah untuk memenuhi kebutuhan industri. Fokus materi pelatihan, yakni persiapan *external sourcing* Bank.

Informasi terkait program pelatihan dan pengembangan yang diikuti karyawan Bank dalam 3 (tiga) tahun terakhir diungkapkan sebagai berikut.

2. Fulfillment Program through Management Development Program (MDP) and Information Technology (IT) Graduate Camp and Data Freshman Camp;
3. Skills Development in Sales area is implemented for Frontliners (Customer Service & Sales Officer and Teller) to enhance skills in cross-selling products through Sales Onboarding & Close Every Deals program. Additionally, skills enhancement for talents in IT sector is also conducted through training programs supporting information technology (IT) and digital transformation, especially in areas of IT governance, product management, IT risk management, and personal data protection.

In line with technology advancement, training and development programs at Bank Sinarmas are conducted digitally through e-learning, using both internal and external platforms. Therefore, the Bank consistently creates unique content in the form of instructional videos or interactive materials.

Nevertheless, face-to-face training and development are still carried out through collaboration with educational institutions, especially in training that supports government programs to meet industry needs, with a focus on material preparation for the Bank's external sourcing.

Information on training and development programs attended by the Bank's employees in the last 3 years is disclosed as follows.

## Realisasi
**Realization**

| Nama Program<br>Program Name | 2024 | | 2023 | | 2022 | |
|---|---|---|---|---|---|---|
| | Jumlah Program<br>Total Programs | Jumlah Peserta<br>Total Participants | Jumlah Program<br>Total Programs | Jumlah Peserta<br>Total Participants | Jumlah Program<br>Total Programs | Jumlah Peserta<br>Total Participants |
| *Mandatory* | 51 | 1.900 | 133 | 2.334 | 145 | 1.741 |
| *Technical Skills* | 1.987 | 71.158 | 3.675 | 63.483 | 2.327 | 17.559 |
| *Soft Skills* | 190 | 2.438 | 260 | 1.801 | 478 | 4.873 |
| *Motivational* | 55 | 5.890 | 69 | 3.311 | 99 | 4.304 |
| *Knowledge Sharing* | 2.140 | 72.940 | 4.290 | 92.417 | 8.434 | 135.499 |
| *Others* | 2 | 16 | 76 | 391 | 108 | 1.202 |

| Uraian<br>Description | Satuan<br>Unit | 2024 | 2023 | 2022 |
|---|---|---|---|---|
| Jam Pelatihan<br>Training Hours | Jam<br>Hour | 445.707,52 | 406.645,51 | 374.606,76 |
| Jam Pelatihan per Karyawan<br>Training Hours per Employee | Jam/Orang<br>Hour/person | 91,48 | 76,78 | 73,58 |

Pelatihan dan pengembangan karyawan berdasarkan level jabatan dan program pelatihan selama tahun 2024 ditunjukkan sebagai berikut.

Employee training and development based on position level and training programs for 2024 are shown as follows.

| Program Pelatihan<br>Training Program | Pelatihan dan Pengembangan<br>Training and Development | | | | | |
|---|---|---|---|---|---|---|
| | TM | MM | FM | S | Total | % |
| *Mandatory* | 79 | 845 | 681 | 295 | 1.900 | 1,23% |
| *Technical Skills* | 519 | 13.757 | 23.636 | 33.246 | 71.158 | 46,10% |
| *Soft Skills* | 45 | 589 | 915 | 889 | 2.438 | 1,58% |
| *Motivational* | 60 | 1.019 | 1.989 | 2.822 | 5.890 | 3,82% |
| *Knowledge Sharing* | 206 | 8.027 | 25.961 | 38.746 | 72.940 | 47,26% |
| *Others* | 0 | 6 | 3 | 7 | 16 | 0,01% |
| ***Total*** | **909** | **24.243** | **53.185** | **76.005** | **154.342** | **100%** |

Keterangan : I Remark:
TM : *Top Management*
MM : *Middle Management*
FM : *Firstline Management*
S : *Staff*

Rasio biaya yang dikeluarkan Bank dalam pelaksanaan pelatihan dan pengembangan karyawan dibandingkan dengan BTK (Biaya Tenaga Kerja) selama tahun 2024 adalah 3,53%.

The ratio of costs incurred by the Bank in implementing employee training and development compared to Cost of Labor during 2024 was 3.53%.

## Kompensasi dan Manfaat

Bank senantiasa berpedoman pada peraturan perundang-undangan yang berlaku dan kebijakan lainnya dalam memberikan kompensasi dan manfaat kepada karyawan. Kebijakan tersebut dilakukan melalui proses kajian yang mempertimbangkan kontribusi setiap karyawan, tingkat kompetitif di industri, serta kemampuan Bank.

1. **Remunerasi**
   Sesuai Anggaran Dasar Bank, Dewan Komisaris dan Direksi memperoleh remunerasi berupa honorarium, tunjangan pemeliharaan kesehatan, jasa produksi, tunjangan hari raya (THR), yang diputuskan dalam pelaksanaan Rapat Umum Pemegang Saham (RUPS) pada semester 1 (satu) setiap tahun buku.

2. **Implementasi Peraturan Otoritas Jasa Keuangan**
   Bank senantiasa memastikan bahwa implementasi Peraturan Otoritas Jasa Keuangan No. 45/POJK.03/2015 tentang Penerapan Tata Kelola dalam Pemberian Remunerasi bagi Bank Umum telah berjalan dengan baik.

3. **Penerapan Uang Kompensasi Bagi Karyawan Perjanjian Kerja Waktu Tertentu (PKWT)**
   Sesuai Undang-Undang No. 11 tahun 2020 tentang Cipta Kerja dan Peraturan Pemerintah No. 35 tahun 2021 tentang Perjanjian Kerja Waktu Tertentu, Alih Daya, Waktu Kerja dan Waktu Istirahat, dan Pemutusan Hubungan Kerja, Bank memberikan uang kompensasi kepada setiap karyawan yang masa PKWT-nya telah

## Compensation and Benefits

The Bank always refers to applicable laws and regulations and other policies in providing compensation and benefits to employees. The policy is carried out through a review process that takes into account the contribution of each employee, the competitive level in the industry, and the Bank's capabilities.

1. **Remuneration**
   According to the Bank's Articles of Association, the Board of Commissioners and the Board of Directors receive remuneration in the form of honorariums, health allowances, production services, and holiday allowances (THR), which are decided upon during the GMS in the first semester of each fiscal year.

2. **Implementation of Financial Services Authority**
   Regulation No 45 The Bank always ensures that the implementation of Financial Services Authority Regulation No. 45/POJK.03/2015 on the Implementation of Governance in Remuneration for Commercial Banks has been carried out effectively.

3. **Implementation of Compensation for Contract (PKWT)**

   Employees In accordance with Law No. 11 of 2020 on Job Creation and Government Regulation No. 35 of 2021 on Work Agreements for Specific Time, Outsourcing, Working Time and Rest Time, and Termination, the Bank compensates each employee whose Contract (PKWT) agreement has expired or whose employment period

berakhir atau masa kerja telah selesai. Adapun besaran uang kompensasi yang diberikan, disesuaikan dengan kebijakan yang berlaku di Bank.

## Pengembangan Model Kualifikasi dan Pemetaan Talenta

Bank telah menerapkan model kualifikasi sejak tahun 2018 dan senantiasa mengembangkan berbagai proses termasuk pemetaan talenta agar setiap tahapan evaluasi karyawan mengacu kepada aspek-aspek yang telah disusun. Hasil dari *assessment* menjadi salah satu sumber dalam menentukan kebutuhan pengembangan yang tepat sasaran.

Pada tahun 2024, terdapat 5.555 kandidat telah menyelesaikan *online assessment* untuk kebutuhan seleksi, promosi maupun evaluasi di jabatan yang dituju. Bank juga secara bertahap telah menerapkan proses baru dalam pemetaan talenta, dengan menggunakan parameter dan *tools* yang berbeda dengan tujuan mengembangkan pengelolaan talenta yang terintegrasi.

## Manajemen Karier

Sistem manajemen karier yang lebih komprehensif telah disiapkan Bank dengan memperhatikan sistem pengembangan SDM berbasis kompetensi. Langkah ini dilakukan dalam rangka:

1. Memberi kesempatan kepada karyawan untuk mengembangkan kompetensinya selaras dengan kebutuhan posisi dalam Bank;
2. Memberikan acuan bagi pergerakan karier karyawan sesuai potensinya, sehingga karyawan dapat menentukan arah kariernya; serta
3. Mendukung *engagement* karyawan yang dapat mendorong peningkatan produktivitas dan kontribusi bagi Bank.

## Internalisasi Budaya Kerja

Bank melakukan berbagai upaya dalam menginternalisasikan budaya dan etos kerja kepada setiap karyawan. Di antara realisasinya adalah:

1. Menjadi salah satu komponen dalam sesi *induction* bagi karyawan baru, melalui penyampaian materi yang menjelaskan mengenai *Corporate Profile*, yang meliputi visi dan misi Bank, objektif jangka panjang, etos kerja, moto, dan *corporate value*;
2. Ketersediaan material berisi *corporate values*, etos kerja, kode etik, dan pedoman tingkah laku dalam Aplikasi *E-Learning* yang dapat diakses oleh setiap karyawan; dan
3. Menyanyikan Himne Sinar Mas Terang dan pembacaan Nilai Luhur Sinar Mas secara bersama-sama setiap memulai kegiatan pelatihan.

has ended. The compensation amount is adjusted in accordance with the Bank's policies.

## Development of a Qualification Model and Talent Mapping

The Bank has been implementing a qualification model since 2018 and continuously developing various processes including talent mapping, so that every stage of employee evaluation refers to the aspects that have been outlined. The assessment results become one of the sources in determining targeted development needs.

In 2024, as many as 5,555 candidates completed online assessments for selection, promotion, and evaluation needs in their respective positions. The Bank also gradually implemented new processes in talent mapping, using different parameters and tools aiming to develop an integrated talent management.

## Career Management

The Bank prepares a more comprehensive career management system by considering competency-based HR development systems. This step is taken in order to:

1. Provide opportunities for employees to develop their competencies in line with the position's needs within the Bank;
2. Provide guidance for employees' career progression according to their potential, allowing employees to determine their career path; and
3. Support employee engagement, which can lead to increased productivity and contribution to the Bank.

## Internalization of Work Culture

The Bank undertakes various efforts to internalize culture and work ethics among every employee, including:

1. Become one of the components in induction sessions for new employees, through delivery of materials explaining Corporate Profile, which includes the Bank's vision and mission, long-term objectives, work ethos, motto, and corporate values;
2. Availability of materials containing corporate values, work ethics, code of ethics, and guidelines for behavior in E-Learning Application accessible to every employee; and
3. Singing the 'Sinar Mas Terang' Anthem and reading Sinar Mas Core Values together at the beginning of training activities.

## Hubungan Kepegawaian

Bank berkomitmen untuk menjaga hubungan baik dengan seluruh karyawan, yang dilakukan melalui berbagai kegiatan sebagai berikut:

1. Menumbuhkan dan menciptakan harmonisasi antara pekerjaan dan kehidupan pribadi (work life harmony) melalui penyelenggaraan kegiatan engagement (penghargaan masa kerja, pemberian hadiah ulang tahun, dan lainnya) serta mendukung kegiatan-kegiatan komunitas karyawan (olahraga, seni, dan lainnya);
2. Terus mendorong kegiatan Internalisasi Six Values Sinar Mas antara lain melalui penyelenggaraan Most Valuable Employee Awards (MVEA) yang dapat memperkuat fondasi karyawan terhadap values Bank dalam penerapannya pada aktivitas pekerjaan sehari-hari;
3. Mempersiapkan dan memberikan pembekalan karyawan dalam memasuki usia pensiun sehingga pasca pensiun karyawan siap secara mental dan spiritual; serta
4. Menyusun Employee Value Proposition (EVP) yaitu suatu program untuk menjual nilai dan manfaat bagi karyawan dan kandidat dalam hal company branding, tujuan kerja, kesejahteraan, rasa memiliki, perkembangan karir, dan kompensasi termasuk mengkampanyekan berbagai kegiatan engagement, relawan dan komunitas karyawan dalam media sosial.

## Employment Relations

The Bank is committed to maintaining good relationships with all employees through various engagement activities aimed at:

1. Fostering and promoting work-life harmony by organizing engagement initiatives, such as service awards, giving birthday gifts, and other activities, while also supporting employee community programs in areas such as sports, arts, and more.
2. Continue promoting the internalization of the Sinar Mas Six Values by holding activities such as the Most Valuable Employee Awards (MVEA), which aimed at strengthening employees' alignment with the Bank's core values in their daily work practices.
3. Preparing and equipping employees as they approach retirement, ensuring they are mentally and spiritually ready to transition into post-retirement life; and
4. Developing the Employee Value Proposition (EVP), a program designed to communicate the values and benefits for employees and candidates in terms of company branding, work objectives, welfare, sense of belonging, career development, and compensation, including promoting various engagement activities, volunteer programs, and employee communities on social media.

## Layanan Kepegawaian

Bank Sinarmas menyediakan layanan kepegawaian melalui HCM *Care* demi menjaga kenyamanan kerja dan produktivitas seluruh karyawan. Layanan yang dikelola oleh HCM tersebut senantiasa ditingkatkan untuk mempercepat *response time* dan *Service Level Agreement* (SLA) dalam setiap bidang pelayanan yang dikelola.

HCM *Care* juga melakukan evaluasi dan tindak lanjut pengaduan yang diterima, baik pengaduan dalam bentuk keluhan karyawan, produk, ataupun fasilitas yang disediakan oleh HCM. Bank memastikan HCM senantiasa melakukan pengembangan berkelanjutan untuk menciptakan layanan kepegawaian yang *seamless* dan efisien.

Selain itu, penyebaran informasi terkait proses dan prosedur SDM terus disebarkan melalui media reguler pada portal internal Bank dan dalam bentuk konten video yang lebih menarik. Dengan demikian, karyawan dapat dengan mudah memahami informasi yang disampaikan.

## Employment Service

To ensure the comfort and productivity of all employees, Bank Sinarmas offers employment services through HCM Care. HCM's managed services are constantly improved to improve response time and Service Level Agreement (SLA) in each managed service area.

In addition, HCM Care evaluates and follows up on complaints, whether they are about employees, products, or HCM facilities. The Bank ensures that HCM undergoes continuous development in order to provide seamless and efficient personnel services.

Furthermore, information dissemination regarding HR processes and procedures is distributed through regular media on the Bank's internal portal and in the form of more engaging video content. Thus, employees can easily understand the information conveyed.

# TEKNOLOGI INFORMASI
## Information Technology





Pengembangan teknologi informasi (TI) yang unggul memberikan dukungan pada Bank Sinarmas dalam melakukan inovasi dan pengembangan bisnis yang adaptif. Hal ini dilakukan sebagai upaya Bank memberikan layanan terbaik kepada nasabah dan pemangku kepentingan lainnya.

Karena itu, Bank senantiasa mengembangkan TI secara berkelanjutan, sehingga dapat memfasilitasi kinerja Bank yang lebih baik sebagai lembaga jasa keuangan. Bank juga menyesuaikan sistem kerja dan layanan dengan dukungan sarana TI agar proses kerja lebih cepat, sistematis, dan saling terintegrasi.

### Struktur Organisasi Pengelola Teknologi Informasi

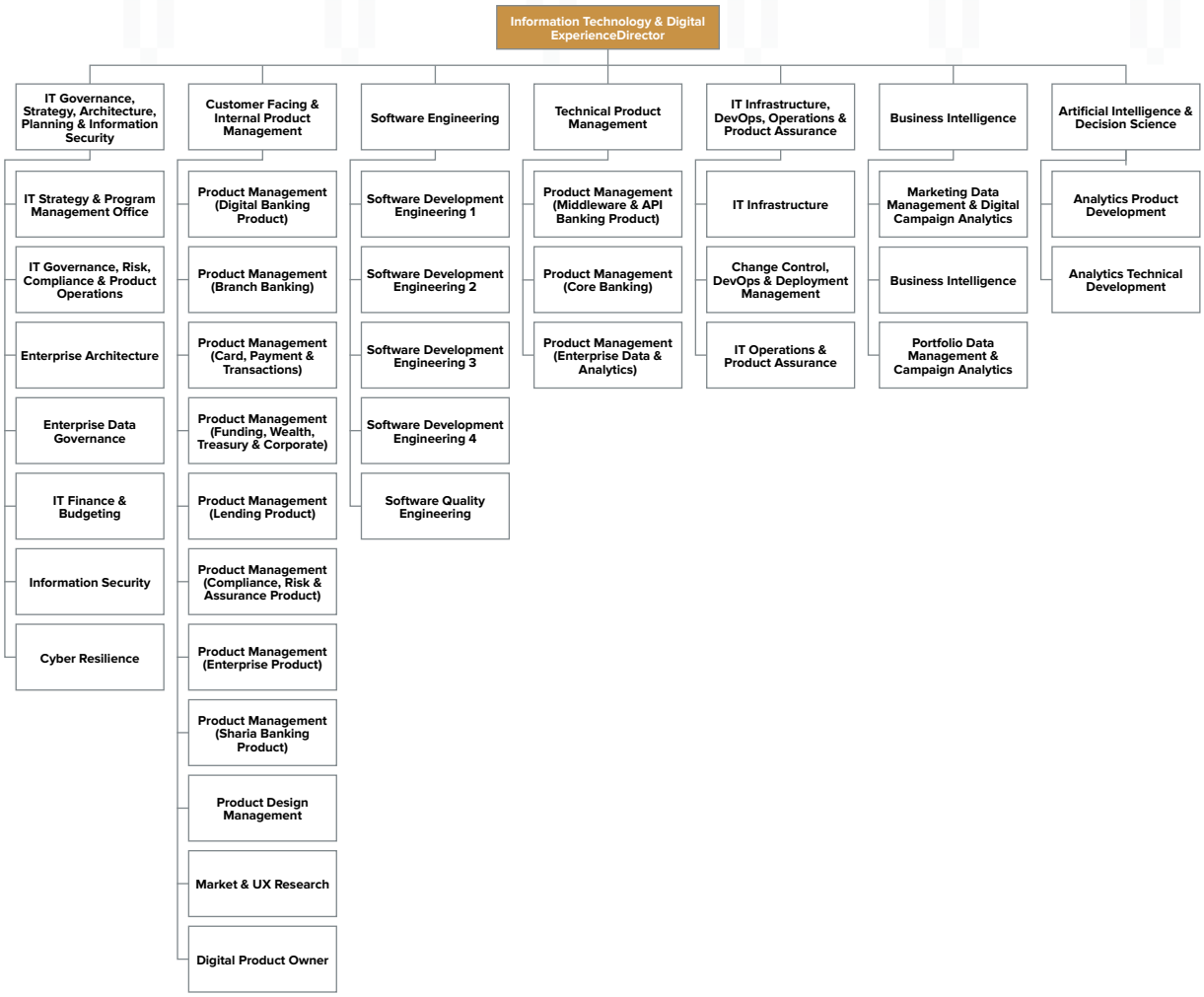
Pengelolaan dan pengembangan TI dalam organisasi Bank Sinarmas dijalankan Group *Information Technology*. Divisi tersebut dipimpin oleh *Group Head* yang bertanggung jawab langsung kepada Direktur *Information Technology* & *Digital Experience*.

The development of excellent information technology (IT) provides support for Bank Sinarmas in making innovations and developing adaptive business models. The Bank has made such an effort in order to deliver the best services to customers and other stakeholders.

This underlies why the Bank sustainably develops its IT in order that it can help the Bank deliver higher performance as a financial services institution. The Bank also adjusts the work system and services with the support of IT facilities so that the work process is faster, more systematic, and more integrated.

### Information Technology Organizational Structure

The Information Technology (IT) Division is in charge of IT development and management at Bank Sinarmas. This division is led by a Group Head who reports directly to the Information Technology & Digital Experience Director.




## Pengembangan Tahun 2024

Bank Sinarmas telah menyusun Panduan *Information Technology Strategic Plan* (ITSP) yang telah disesuaikan dengan visi Bank untuk mengoptimalkan penerapan TI. Panduan tersebut memuat rencana strategis TI Bank yang disajikan dalam bentuk *road map*, dengan pencapaian pengembangan di tahun 2024 sebagai berikut.

## Development in 2024

To optimize IT implementation, Bank Sinarmas developed Information Technology Strategic Plan (ITSP) Guidelines that are aligned with the bank's vision. These guidelines contain the Bank's strategic IT plan presented in the form of a roadmap, with development milestones in 2024 as shown below.

| No. | Pengembangan<br>Development | Manfaat<br>Benefits | Penerima Manfaat<br>Beneficiaries |
|---|---|---|---|
| 1 | Implementasi Loan Management System<br>Implementation of Loan Management System | Otomasi proses, meningkatkan efisiensi, mengurangi risiko, dan meningkatkan keuntungan Bank. Nasabah mendapatkan layanan pinjaman yang lebih cepat, mudah, dan personal. LMS juga membantu Bank dalam penilaian kredit yang akurat, pemantauan pinjaman secara real-time, dan kepatuhan terhadap regulasi.<br>Process automation, increasing efficiency, reducing risk, and increasing Bank profits. Customers get faster, easier, and more personalized loan services. LMS also helps the Bank in accurate credit assessment, real-time loan monitoring, and regulatory compliance. | 1. Bank Sinarmas<br>2. Nasabah I Customers |

| No. | Pengembangan<br>Development | Manfaat<br>Benefits | Penerima Manfaat<br>Beneficiaries |
|---|---|---|---|
| 2 | Implementasi Sistem KPR<br>Implementation of Mortgage System | Meningkatkan efisiensi operasional melalui otomatisasi proses persetujuan dan pengelolaan data, mengurangi risiko kredit melalui penilaian yang lebih akurat, dan meningkatkan kepuasan nasabah dengan layanan yang lebih cepat. Nasabah diuntungkan dengan kemudahan akses informasi, proses pengajuan yang dipercepat, dan pilihan produk KPR yang lebih personal, sehingga mempermudah kepemilikan rumah impian mereka.<br>Improve operational efficiency through automation of approval processes and data management, reduce credit risk through more accurate assessments, and increase customer satisfaction with faster service. Customers benefit from easy access to information, accelerated application processes, and more personalized mortgage product options, making it easier to own their dream home. | 1. Bank Sinarmas<br>2. Nasabah I Customers |
| 3 | Implementasi Leads System<br>Leads System Implementation | Peningkatan efisiensi dalam mengelola calon pelanggan, mempercepat proses penjualan, dan meningkatkan konversi melalui pelacakan dan analisis data leads yang terpusat. Nasabah New to Bank merasakan pengalaman yang lebih personal dan responsif, mendapatkan informasi yang relevan dengan cepat, dan alur komunikasi yang lebih lancar, yang mempermudah mereka dalam mengambil keputusan pembelian.<br>Increased efficiency in managing leads, accelerating the sales process, and increasing conversions through centralized lead data tracking and analysis. New to Bank customers experience a more personalized and responsive experience, receive relevant information quickly, and have a smoother communication flow, making it easier for them to make purchasing decisions. | 1. Bank Sinarmas<br>2. Nasabah New to Bank<br>New to Bank Customers |
| 4 | Implementasi Reward Point<br>Reward Point Implementation | Meningkatkan loyalitas pelanggan, mendorong pembelian berulang, dan mendapatkan data pelanggan yang berharga untuk pemasaran yang lebih efektif. Nasabah memperoleh nilai tambah dari setiap pembelian melalui akumulasi poin yang dapat ditukar dengan berbagai hadiah atau diskon, menciptakan pengalaman berbelanja yang lebih memuaskan.<br>Increase customer loyalty, encourage repeat purchases, and gain valuable customer data for more effective marketing. Customers gain added value from every purchase through accumulated points that can be exchanged for various gifts or discounts, creating a more satisfying shopping experience. | 1. Bank Sinarmas<br>2. Nasabah I Customers |
| 5 | Implementasi UR (Unified Registration)<br>Implementation of UR (Unified Registration) | Mengurangi duplikasi data, meningkatkan efisiensi operasional, dan memberikan visibilitas pelanggan yang lebih baik. Konsumen diuntungkan dengan proses pendaftaran yang lebih cepat dan mudah, pengalaman pengguna yang lebih personal, dan kontrol yang lebih besar atas data pribadi mereka.<br>Reduce data duplication, increase operational efficiency, and provide better customer visibility. Consumers benefit from faster and easier sign-up processes, a more personalized user experience, and greater control over their personal data. | 1. Bank Sinarmas<br>2. Nasabah I Customers |
| 6 | Implementasi Peningkatan Sistem Middleware<br>Middleware System Enhancement Implementation | Efisiensi operasional melalui integrasi sistem yang lebih lancar, peningkatan stabilitas dan skalabilitas aplikasi, serta pengurangan risiko kegagalan sistem. Pengguna akhir diuntungkan dengan pengalaman yang lebih cepat dan responsif, akses data yang lebih andal, serta peningkatan kualitas layanan secara keseluruhan.<br>Operational efficiency through smoother system integration, improved application stability and scalability, and reduced risk of system failure. End users benefit from faster and more responsive experiences, more reliable data access, and improved overall service quality. | 1. Bank Sinarmas<br>2. End User |
| 7 | Implementasi Peningkatan sistem Big Data<br>Implementation of Big Data System Improvement | Mendapatkan wawasan mendalam melalui analisis data yang komprehensif, memungkinkan pengambilan keputusan berbasis data yang lebih akurat, personalisasi layanan pelanggan, dan identifikasi tren pasar secara cepat.<br>Gain deep insights through comprehensive data analysis, enabling more accurate data-driven decision making, personalization of customer service, and rapid identification of market trends. | 1. Bank Sinarmas |
| 8 | Implementasi Pengembangan Sistem Kartu Kredit<br>Implementation of Credit Card System Development | Meningkatkan pendapatan dari biaya transaksi dan bunga, memperluas jangkauan layanan, serta meningkatkan loyalitas nasabah. Bagi nasabah, memberikan kemudahan transaksi, fleksibilitas pembayaran, manfaat tambahan seperti poin reward dan cashback, serta perlindungan dalam bertransaksi.<br>Increase revenue from transaction fees and interest, expand service coverage, and increase customer loyalty. For customers, provide ease of transactions, payment flexibility, additional benefits such as reward points and cashback, and protection in transactions. | 1. Bank Sinarmas<br>2. Nasabah I Customers |
| 9 | Implementasi Pengembangan Sistem Mobile Banking "Simobi+"<br>Implementation of Mobile Banking System Development "Simobi+" | Meningkatkan efisiensi operasional, memperluas jangkauan layanan, serta mengumpulkan data pelanggan untuk personalisasi layanan. Bagi nasabah, memberikan kemudahan transaksi perbankan kapan saja dan di mana saja, akses informasi rekening secara real-time, serta pengalaman pengguna yang lebih praktis dan aman.<br>Improve operational efficiency, expand service coverage, and collect customer data for service personalization. For customers, providing easy banking transactions anytime and anywhere, real-time account information access, and a more practical and secure user experience. | 1. Bank Sinarmas<br>2. Nasabah I Customers |

| No. | Pengembangan<br>Development | Manfaat<br>Benefits | Penerima Manfaat<br>Beneficiaries |
|---|---|---|---|
| 10 | Implementasi API dengan berbagai partner<br>API implementation with various partners | API memfasilitasi integrasi yang mulus dengan ekosistem partner, memperluas jangkauan layanan, meningkatkan efisiensi operasional, dan mendorong inovasi melalui kolaborasi. End user merasakan kemudahan akses ke berbagai layanan terintegrasi, pengalaman yang lebih personal, dan inovasi produk yang lebih cepat, menciptakan ekosistem yang saling menguntungkan.<br>APIs facilitate seamless integration with partner ecosystems, expand service reach, improve operational efficiency, and drive innovation through collaboration. End users experience easy access to integrated services, more personalized experiences, and faster product innovation, creating a mutually beneficial ecosystem. | 1. Bank Sinarmas<br>2. End User |
| 11 | Implementasi Pengembangan Sistem Switching/Sistem Kartu Debit<br>Implementation of Switching System Development/Debit Card System | Bagi bank, sistem ini meningkatkan efisiensi transaksi, mengurangi biaya operasional, dan memperluas jangkauan layanan. Bagi merchant, memfasilitasi penerimaan pembayaran non-tunai yang lebih cepat dan aman, meningkatkan potensi penjualan, dan mengurangi risiko penanganan uang tunai. Bagi nasabah, memberikan kemudahan dan kenyamanan dalam bertransaksi, aksesibilitas dana yang lebih luas, serta keamanan dalam bertransaksi secara elektronik.<br>For banks, this system increases transaction efficiency, reduces operational costs, and expands service coverage. For merchants, it facilitates faster and safer non-cash payment acceptance, increases sales potential, and reduces the risk of handling cash. For customers, it provides ease and convenience in transactions, wider accessibility of funds, and security in electronic transactions. | 1. Bank Sinarmas<br>2. Merchant<br>3. Nasabah \| Customers |
| 12 | Implementasi Sistem Pendukung Spin Off Sharia<br>Implementation of Sharia Spin Off Support System | Untuk bank induk, memfasilitasi transisi yang mulus, menjaga kepatuhan syariah, dan meminimalkan risiko operasional. Unit syariah yang baru mandiri mendapatkan infrastruktur IT yang siap pakai, memungkinkan fokus pada pertumbuhan bisnis dan layanan syariah. Nasabah merasakan kelangsungan layanan tanpa gangguan, kepastian kepatuhan prinsip syariah, serta potensi pengembangan produk dan layanan syariah yang lebih inovatif.<br>For the parent bank, facilitating a smooth transition, maintaining sharia compliance, and minimizing operational risks. The newly independent sharia unit receives ready-to-use IT infrastructure, allowing it to focus on business growth and sharia services. Customers experience uninterrupted service continuity, certainty of compliance with sharia principles, and the potential for developing more innovative sharia products and services. | 1. Bank Sinarmas<br>2. Bank Nano Syariah<br>3. Nasabah \| Customers |
| 13 | Implementasi Sistem Internet Banking Corporate<br>Implementation of Corporate Internet Banking System | Bagi bank, meningkatkan efisiensi operasional, memperluas jangkauan layanan, serta mengumpulkan data transaksi untuk analisis bisnis. Bagi nasabah korporasi, memberikan kemudahan pengelolaan keuangan secara real-time, fleksibilitas transaksi tanpa batas waktu dan lokasi, serta meningkatkan kontrol dan visibilitas atas arus kas perusahaan.<br>For banks, it improves operational efficiency, expands service coverage, and collects transaction data for business analysis. For corporate customers, it provides real-time financial management convenience, transaction flexibility without time and location limitations, and improves control and visibility over the company's cash flow. | 1. Bank Sinarmas<br>2. Nasabah Korporat<br>Corporate customers |
| 14 | Implementasi Contact Centre & Communication Platform<br>Implementation of Contact Center & Communication Platform | Bank mendapatkan pengelolaan interaksi pelanggan yang terpusat dan terukur, pengurangan biaya operasional, serta peningkatan data analisis untuk strategi layanan yang lebih baik. Nasabah diuntungkan dengan kemudahan akses layanan, respons yang lebih cepat, pengalaman komunikasi yang personal, dan penyelesaian masalah yang lebih efektif melalui berbagai saluran komunikasi.<br>Banks gain centralized and scalable customer interaction management, reduced operational costs, and increased data analytics for better service strategies. Customers benefit from easy access to services, faster responses, personalized communication experiences, and more effective problem resolution through multiple communication channels. | 1. Bank Sinarmas<br>2. Nasabah \| Customers |
| 15 | Implementasi Anti Fraud System - Phase 2<br>Anti Fraud System Implementation - Phase 2 | Bagi bank, sistem ini mengurangi kerugian finansial akibat fraud, menjaga reputasi, kepatuhan terhadap regulasi, meningkatkan efisiensi operasional melalui deteksi dini dan pencegahan yang lebih canggih. Bagi nasabah, memberikan rasa aman dalam bertransaksi, melindungi data pribadi, dan mengurangi risiko menjadi korban penipuan.<br>For banks, this system reduces financial losses due to fraud, maintains reputation, regulatory compliance, increases operational efficiency through early detection and more sophisticated prevention. For customers, it provides a sense of security in transactions, protects personal data, and reduces the risk of becoming a victim of fraud. | 1. Bank Sinarmas<br>2. Nasabah \| Customers |
| 16 | Implementasi Pengembangan Sistem BI-FAST<br>BI-FAST System Development Implementation | Bagi bank, meningkatkan efisiensi transaksi antar bank, mengurangi biaya operasional, dan memperluas jangkauan layanan pembayaran digital. Bagi nasabah, memberikan kemudahan transaksi real-time 24/7 dengan biaya yang lebih murah, serta meningkatkan keamanan dan kenyamanan dalam bertransaksi. Bagi regulator, mendukung digitalisasi sistem pembayaran, mendorong inklusi keuangan, dan mempercepat perputaran ekonomi.<br>For banks, increasing the efficiency of interbank transactions, reducing operational costs, and expanding the reach of digital payment services. For customers, providing convenience of 24/7 real-time transactions at lower costs, and increasing security and convenience in transactions. For regulators, supporting the digitalization of payment systems, encouraging financial inclusion, and accelerating economic turnover. | 1. Bank Sinarmas<br>2. Nasabah \| Customers<br>3. Regulator \| Regulators |

| No. | Pengembangan<br>Development | Manfaat<br>Benefits | Penerima Manfaat<br>Beneficiaries |
|---|---|---|---|
| 17 | Implementasi sistem QRIS<br>Implementation of QRIS system | Bagi bank, sistem QRIS dapat meningkatkan jumlah merchant yang akan bekerja sama dengan bank dan meningkatkan jumlah pendapatan. Bagi merchant, QRIS memudahkan penerimaan pembayaran non-tunai, meningkatkan efisiensi transaksi, dan memperluas jangkauan pasar. Bagi konsumen, QRIS memberikan kemudahan dan keamanan dalam bertransaksi, aksesibilitas dana yang lebih luas, dan kenyamanan bertransaksi tanpa perlu membawa uang tunai.<br>For banks, the QRIS system can increase the number of merchants who will cooperate with the bank and increase the amount of income. For merchants, QRIS facilitates the acceptance of non-cash payments, increases transaction efficiency, and expands market reach. For consumers, QRIS provides ease and security in transactions, wider accessibility of funds, and the convenience of transactions without having to carry cash. | 1. Bank Sinarmas<br>2. Nasabah \| Customers<br>3. Merchant |
| 18 | Implementasi Mutual Fund di channel elektronik/digital<br>Implementation of Mutual Fund in electronic/digital channels | Bagi bank, memperluas penawaran produk investasi, meningkatkan pendapatan non-bunga, serta memperkuat retensi nasabah melalui kemudahan akses investasi reksa dana. Bagi nasabah, memperoleh kemudahan dan fleksibilitas dalam berinvestasi, akses informasi produk yang lebih transparan, serta peluang diversifikasi portofolio investasi melalui platform perbankan digital.<br>For banks, expanding investment product offerings, increasing non-interest income, and strengthening customer retention through easy access to mutual fund investments. For customers, gaining ease and flexibility in investing, access to more transparent product information, and opportunities for diversifying investment portfolios through digital banking platforms. | 1. Bank Sinarmas<br>2. Nasabah \| Customers |
| 19 | Implementasi NFC Mobile Payment<br>Implementation of NFC Mobile Payment | Bagi bank, NFC mengurangi biaya operasional terkait penanganan uang tunai, mempercepat waktu transaksi, serta meningkatkan keamanan dengan mengurangi risiko penipuan. Nasabah menikmati kemudahan pembayaran yang cepat, praktis, dan aman hanya dengan mendekatkan smartphone, serta meningkatkan pengalaman bertransaksi tanpa perlu membawa uang tunai atau kartu fisik.<br>For banks, NFC reduces operational costs associated with handling cash, speeds up transaction times, and increases security by reducing the risk of fraud. Customers enjoy the convenience of fast, practical, and secure payments simply by bringing their smartphones close, and enhances the transaction experience without the need to carry cash or physical cards. | 1. Bank Sinarmas<br>2. Nasabah \| Customers |
| 20 | Implementasi Sistem Pengelolaan Proyek Pengembangan TI<br>Implementation of IT Development Project Management System | Bagi bank, sistem ini meningkatkan efisiensi pengembangan proyek, mengurangi risiko keterlambatan dan biaya berlebih, serta memastikan proyek TI selaras dengan strategi bisnis bank, sehingga menghasilkan produk dan layanan yang lebih inovatif dan responsif. Nasabah diuntungkan dengan layanan perbankan digital yang lebih andal, aman, dan inovatif, serta peningkatan pengalaman pengguna secara keseluruhan.<br>For banks, the system improves project development efficiency, reduces the risk of delays and cost overruns, and ensures IT projects are aligned with the bank's business strategy, resulting in more innovative and responsive products and services. Customers benefit from more reliable, secure and innovative digital banking services, as well as an improved overall user experience. | 1. Bank Sinarmas<br>2. Nasabah \| Customers |



## Investasi TI

Pada tahun 2024 investasi IT dialokasikan untuk kebutuhan *hardware* maupun *software* yang dapat mendukung pengembangan sistem aplikasi Bank, peremajaan perangkat IT, peningkatan kapasitas infrastruktur IT, serta pemeliharaan infrastruktur IT.

## IT Investment

In 2024, IT investment is allocated for hardware and software needs that can support the development of the Bank's application system, IT device rejuvenation, increasing IT infrastructure capacity, and IT infrastructure maintenance.

## Pengembangan Kompetensi SDM TI

Pada tahun 2024, Bank Sinarmas telah melaksanakan berbagai kegiatan pengembangan kompetensi karyawan dalam lingkup TI melalui program berikut:

- IT Leadership Camp
- Google Workspace Training
- COBIT Certification
- Sertifikasi CREST, CEH dan CHFI
- Enterprise Architecture
- Security Awareness
- Perlindungan Data Pribadi
- IT Binus Internship
- E-Learning: Udemy dan MyLearning (Agile, Artificial Intelligence, ISO Training for Information Security, dll.)

## IT HR Competency Development

In 2024, Bank Sinarmas has implemented various employee competency development activities in the IT scope through the following programs:

- IT Leadership Camp
- Google Workspace Training
- COBIT Certification
- CREST, CEH and CHFI Certification
- Enterprise Architecture
- Security Awareness
- Personal Data Protection
- IT Binus Internship
- E-Learning: Udemy and MyLearning (Agile, Artificial Intelligence, ISO Training for Information Security, etc.)

## Tata Kelola TI

Tata kelola TI diterapkan sebagai bagian dari implementasi prinsip tata kelola perusahaan yang baik agar Bank dapat dengan mudah beradaptasi dan responsif dalam menghadapi tantangan industri perbankan di era transformasi digital. Bank senantiasa melakukan identifikasi terhadap risiko utama di bidang TI agar dapat dikelola dengan baik, yang perkembangannya dilaporkan pada Direksi.

Tata kelola tersebut, antara lain mencakup:

1. **Infrastruktur TI**
   Bank Sinarmas meningkatkan kemampuan infrastruktur dan pengamanan TI secara berkelanjutan sebagai mitigasi dalam menghadapi gangguan, keamanan dunia maya, dan pemulihan bencana. Upaya tersebut dilakukan melalui langkah-langkah berikut:
   a. Melakukan peremajaan terhadap server dan infrastruktur TI lainnya serta meningkatkan kapasitas baik storage system ataupun perangkat pendukung di Data Center.
   b. Meningkatkan security sesuai dengan standar best practice, meliputi *infrastructure security, application security, endpoint security*, *security management*, dan *security review* atas seluruh kebijakan dan prosedur TI.
   c. Meningkatkan manajemen infrastruktur TI sesuai dengan standar teknologi best practice seperti capacity planning, clustering, load balancing, dan lainnya, sehingga dapat mencapai service level bagi user dengan cara 'cost effective'
   d. Meningkatkan proses monitoring dan performance tuning sebagai langkah proaktif (pencegahan masalah) maupun reaktif (penyelesaian masalah) untuk mencapai service level sesuai kebutuhan bisnis.

2. **Upaya Mengatasi Disrupsi**
   Dalam menghadapi dinamika perkembangan teknologi dan potensi disrupsi digital, Bank secara konsisten mengambil langkah-langkah strategis untuk memastikan keberlangsungan operasional dan kelancaran pelayanan kepada Nasabah. Upaya yang dilakukan mencakup peningkatan kapabilitas infrastruktur TI, penguatan tata kelola TI, serta penerapan pendekatan proaktif dalam manajemen risiko TI. Bank juga menerapkan arsitektur sistem yang fleksible dan skalabel untuk mendukung ketahanan operasional serta kontinuitas layanan, khususnya dalam merespons dinamika kebutuhan bisnis, percepatan kemajuan teknologi, dan potensi disrupsi yang tidak terduga. Inisiatif transformasi digital dilaksanakan secara bertahap dan terukur guna meningkatkan efisiensi serta mendukung strategi bisnis Bank di era digital.

## IT Governance

IT governance is implemented as part of the GCG implementation to allow the Bank to easily adapt and respond to challenges in the banking industry during the digital transformation era. The Bank consistently identifies the major risks in the IT sector so that they can be properly managed, and the progress of these risks is reported to the Board of Directors.

This governance includes, among other things:

1. **IT Infrastructure**
   Bank Sinarmas continuously improves its infrastructure and IT security capabilities in order to address disruptions, cyber threats, and disaster recovery through the following initiatives.
   a. Refreshing servers and other IT infrastructure and increasing capacity, both in storage systems and supporting devices in the Data Center.
   b. Enhancing security in line with best practice standards, including infrastructure security, application security, endpoint security, security management, and conducting security reviews of all IT policies and procedures.
   c. Improving IT infrastructure management according to best practice technology standards, such as capacity planning, clustering, load balancing, and others, to achieve service levels for users in a cost-effective manner.
   d. Enhancing monitoring processes and performance tuning as proactive (problem prevention) and reactive (problem resolution) actions to achieve service levels according to business needs.

2. **Efforts to Overcome Disruption**
   In facing the dynamics of technological developments and the potential for digital disruption, the Bank consistently takes strategic steps to ensure operational continuity and smooth service to Customers. Efforts made include improving IT infrastructure capabilities, strengthening IT governance, and implementing a proactive approach to IT risk management. The Bank also implements a flexible and scalable system architecture to support operational resilience and service continuity, especially in responding to the dynamics of business needs, accelerated technological advances, and the potential for unexpected disruption. Digital transformation initiatives are implemented in stages and in a measurable manner to increase efficiency and support the Bank's business strategy in the digital era.

**3. Keamanan Dunia Maya (Cyber Security)**

Bank menempatkan keamanan siber sebagai prioritas utama dalam menjaga kepercayaan nasabah dan keberlangsungan layanan perbankan secara digital. Untuk itu, Bank secara aktif mengembangkan dan memperkuat kerangka kerja keamanan siber yang mencakup kebijakan dan prosedur yang disusun mengacu pada regulasi yang berlaku serta standar internasional, seperti ISO 27001. Penguatan juga dilakukan melalui pemanfaatan teknologi yang andal serta peningkatan kesadaran keamanan di seluruh lini organisasi.

Sebagai bagian dari strategi pencegahan dan deteksi dini terhadap ancaman siber, Bank telah menerapkan sistem pemantauan dan perlindungan secara real-time, termasuk sistem deteksi dan pencegahan intrusi, SIEM, serta solusi *endpoint protection*. Sistem-sistem ini memungkinkan identifikasi dini atas anomaly, potensi serangan, dan mitigasi secara cepat sebelum berdampak pada layanan.

Selain itu, Bank menerapkan pengamanan berlapis terhadap aplikasi dan infrastruktur teknologi melalui pengujian kerentanan (VAPT) secara berkala, simulasi serangan berbasis scenario, penerapan firewall, serta integrasi dengan layanan intelijen ancaman global. Bank juga secara aktif membangun budaya keamanan siber melalui program pelatihan dan kampanye kesadaran yang ditujukan kepada seluruh karyawan. Upaya ini merupakan bentuk komitmen Bank untuk menjaga kepercayaan nasabah dan mendukung terciptanya ekosistem digital yang aman dan andal.

**4. Pemulihan Bencana (Disaster Recovery)**

Untuk menjamin kontinuitas layanan dan ketahanan operasional, Bank telah menetapkan Kebijakan dan Prosedur Pemulihan Bencana (Disaster Recovery Plan/ DRP) yang komprehensif. Proses pemulihan didukung oleh infrastruktur Pusat Data Cadangan (Disaster Recovery Center/DRC) yang diuji secara berkala melalui simulasi dan uji coba guna memastikan kesiapan dalam menghadapi berbagai skenario gangguan.

Bank juga melakukan evaluasi dan pembaruan berkala terhadap skenario pemulihan agar senantiasa relevan dengan risiko terkini. Pendekatan ini memastikan bahwa dalam situasi bencana atau gangguan kritikal, Bank tetap mampu menjaga ketersediaan layanan, melindungi data nasabah, dan meminimalkan dampak terhadap operasional.

**3. Cyber Security**

The Bank places cyber security as a top priority in maintaining customer trust and the sustainability of digital banking services. To that end, the Bank actively develops and strengthens a cyber security framework that includes policies and procedures that are prepared in accordance with applicable regulations and international standards, such as ISO 27001. Strengthening is also carried out through the use of reliable technology and increasing security awareness across all lines of the organization.

As part of the prevention and early detection strategy for cyber threats, the Bank has implemented a real-time monitoring and protection system, including an intrusion detection and prevention system, SIEM, and endpoint protection solutions. These systems enable early identification of anomalies, potential attacks, and rapid mitigation before they impact services.

In addition, the Bank implements layered security for applications and technology infrastructure through periodic vulnerability testing (VAPT), scenario-based attack simulations, firewall implementation, and integration with global threat intelligence services. The Bank also actively builds a cyber security culture through training programs and awareness campaigns aimed at all employees. This effort is a form of the Bank's commitment to maintaining customer trust and supporting the creation of a safe and reliable digital ecosystem.

**4. Disaster Recovery**

To ensure continuity of service and operational resilience, the Bank has established a comprehensive Disaster Recovery Plan (DRP) Policy and Procedure. The recovery process is supported by a Disaster Recovery Center (DRC) infrastructure that is periodically tested through simulations and trials to ensure readiness in facing various disruption scenarios.

The Bank also periodically evaluates and updates the recovery scenario to ensure it is always relevant to the latest risks. This approach ensures that in a disaster or critical disruption situation, the Bank is still able to maintain service availability, protect customer data, and minimize the impact on operations.

## Rencana Strategis TI

Divisi IT telah menyusun rencana strategis TI untuk tahun 2025 yang diuraikan sebagai berikut.

1. Peningkatan kapabilitas dan pengalaman pengguna pada seluruh kanal layanan digital Bank, termasuk mobile banking, internet banking, layanan kartu debit dan kredit, chat banking, serta sistem transaksi merchant. Pengembangan ini mencakup pengembangan fitur baru, penyempurnaan dan modernisasi arsitektur teknologi, Hal ini bertujuan untuk meningkatkan kenyamanan, kecepatan, dan keamanan transaksi bagi nasabah maupun mitra bisnis.
2. Pengembangan sistem internal untuk meningkatkan efektivitas dan efisiensi proses kerja, mencakup sistem pengelolaan sumber daya manusia, pengadaan, pengelolaan asset, dokumen, serta sistem pendukung operasional lainnya.
3. Penyempurnaan sistem layanan kredit secara menyeluruh untuk seluruh segmen, termasuk mikro, ritel, consumer, komersial, maupun korporasi dengan berfokus pada peningkatan otomasi proses, integrasi sistem, dan keandalan layanan.
4. Penyempurnaan sistem untuk menunjang kecepatan, akurasi, dan kepatuhan dalam penyusunan pelaporan kepada regulator serta mendukung pemenuhan terhadap regulasi yang berlaku.
5. Pengembangan sistem berbasis API sebagai bagian dari strategi Open Banking, untuk memperluas integrasi layanan Bank dengan mitra strategis termasuk pelaku fintech, serta mendukung kolaborasi digital secara B2B. Melalui platform API management yang komprehensif, Bank mendorong fleksibilitas, skalabilitas, dan keandalan dalam pengelolaan dan pemanfaatan layanan digital secara terbuka.
6. Peningkatan arsitektur TI melalui penyempurnaan dan modernisasi sistem middleware, guna mendukung skalabilitas, efisiensi pengembangan layanan, penggunaan ulang layanan (reusability), serta kemudahan integrasi antar sistem sesuai best practice industry.
7. Penguatan sistem yang mendukung pemanfaatan data dalam pengambilan keputusan, pengukuran efektivitas aktivitas pemasaran, serta strategi akuisisi dan retensi nasabah berbasis insight. Termasuk di dalamnya digitalisasi proses onboarding dan penjaringan calon nasabah melalui sistem terintegrasi, guna memastikan pengalaman pengguna yang lebih cepat mudah, dan konsisten di seluruh lini bisnis Bank.
8. Pengembangan sistem yang mendukung pemantauan kepatuhan, pengelolaan risiko TI, kebutuhan audit, fraud management, serta legal dan ketahanan operasional Bank. Termasuk di dalamnya penerapan sistem dan infrastruktur untuk mendukung rencana aksi pemulihan sesuai ketentuan regulator.

## IT Strategic Plan

The IT Division has prepared a strategic plan for Information Technology area in 2025 which is outlined as follows:

1. Improving the capabilities and user experience across all of the Bank's digital service channels, including mobile banking, internet banking, debit and credit card services, chat banking, and merchant transaction systems. This development includes the development of new features, refinement and modernization of technological architecture. This aims to improve the convenience, speed, and security of transactions for customers and business partners.
2. Development of internal systems to improve the effectiveness and efficiency of work processes, including human resource management systems, procurement, asset management, documents, and other operational support systems.
3. Improvement of the overall credit service system for all segments, including micro, retail, consumer, commercial, and corporate by focusing on improving process automation, system integration, and service reliability.
4. Improvement of the system to support speed, accuracy, and compliance in preparing reports to regulators and supporting compliance with applicable regulations.
5. Development of an API-based system as part of the Open Banking strategy, to expand the integration of the Bank's services with strategic partners including fintech players, and support B2B digital collaboration. Through a comprehensive API management platform, the Bank drives flexibility, scalability, and reliability in the management and utilization of digital services openly.
6. Improvement of IT architecture through refinement and modernization of middleware systems, to support scalability, service development efficiency, service reuse (reusability), and ease of integration between systems according to industry best practices.
7. Strengthening systems that support data utilization in decision making, measuring the effectiveness of marketing activities, and insight-based customer acquisition and retention strategies. This includes digitizing the onboarding process and recruiting prospective customers through an integrated system, to ensure a faster, easier, and consistent user experience across all Bank business lines.
8. Development of systems that support compliance monitoring, IT risk management, audit needs, fraud management, and the Bank's legal and operational resilience. This includes the implementation of systems and infrastructure to support recovery action plans according to regulatory provisions.

9. Implementasi system untuk mendukung kepatuhan Bank terhadap Undang-Undang No.27 Tahun 2022tentang Perlindungan Data Pribadi
10. Dukungan infrastruktur dan aplikasi untuk memperkuat sinergi perbankan dengan entitas anak.

9. Implementation of systems to support the Bank's compliance with Law No. 27 of 2022 concerning Personal Data Protection
10. Support for infrastructure and applications to strengthen banking synergy with subsidiaries.

# TATA KELOLA PERUSAHAAN

## Corporate Governance



.06

# KOMITMEN PENERAPAN TATA KELOLA PERUSAHAAN YANG BAIK

## Commitment to Implementing Good Corporate Governance



PT. Bank Sinarmas Tbk. ("Bank Sinarmas", "Bank") meyakini penerapan prinsip tata kelola perusahaan yang baik atau *Good Corporate Governance* (GCG) akan mendukung pertumbuhan kinerja Bank secara berkelanjutan. Penerapan GCG juga dapat menciptakan lingkungan usaha yang sehat, karena selaras dengan peraturan perundang-undangan maupun praktik terbaik di industri.

Karena itu, sebagai wujud komitmen untuk senantiasa meningkatkan kualitas penerapan GCG, di antaranya, Bank Sinarmas melakukan peninjauan (*review*) secara berkala. Inisiatif ini sebagai upaya agar praktik yang diterapkan oleh Bank dapat mengadopsi perubahan di lingkungan usaha, khususnya terkait dengan perbankan.

Komitmen tersebut menunjukkan bahwa Bank tidak memandang penerapan GCG sekadar kepatuhan terhadap peraturan perundang-undangan. Lebih dari itu, prinsip-prinsip GCG yang telah melekat dalam setiap aspek kegiatan usaha Bank, diharapkan dapat memberikan manfaat maksimal bagi para pemangku kepentingan maupun Bank.

### Asas dalam Penerapan GCG

Penerapan Tata Kelola Bank Sinarmas senantiasa berlandaskan pada 5 (lima) prinsip dasar Tata Kelola yang baik sebagai berikut:

PT. Bank Sinarmas Tbk. ("Bank Sinarmas," "Bank") believes that the implementation of good corporate governance (GCG) principles will support the Bank's sustainable performance growth. The implementation of GCG can also create a healthy business environment because it is in line with laws and regulations and best practices in the industry.

Therefore, as a form of commitment to continuously improve the quality of GCG implementation, among others, Bank Sinarmas conducts periodic reviews. This initiative is an effort to ensure that the practices implemented by the Bank can adopt changes in the business environment, especially related to banking.

This commitment shows that the Bank does not view the implementation of GCG as merely compliance with laws and regulations. Moreover, the principles of GCG that have been embedded in every aspect of the Bank's business activities are expected to provide maximum benefits for stakeholders and the Bank.

### Principles in the Implementation of GCG

The implementation of Bank Sinarmas's Governance is always based on the following 5 (five) basic principles of good governance:

| | |
|---|---|
| **Keterbukaan**<br>**Transparancy** | Keterbukaan (*transparency*) mencakup keterbukaan dalam proses pengambilan keputusan dan keterbukaan dalam pengungkapan dan penyediaan informasi yang relevan dan mudah diakses oleh Pemangku Kepentingan.<br>Transparency includes openness in the decision-making process and openness in disclosing and providing relevant and easily accessible information to Stakeholders. |
| **Akuntabilitas**<br>**Accountabilility** | Akuntabilitas (*accountability*) mencakup kejelasan fungsi dan pelaksanaan pertanggungjawaban.<br>Accountability includes clarity of function and implementation of accountability. |
| **Pertanggungjawaban**<br>**Responsibility** | Tanggung jawab (*responsibility*) mencakup kesesuaian pengelolaan dengan ketentuan peraturan perundang - undangan dan nilai etika serta standar, prinsip, dan praktik.<br>Responsibility includes compliance with management provisions of laws and regulations and ethical values as well as standards, principles, and practices. |
| **Independensi**<br>**Independency** | Independensi (*independency*) mencakup keadaan yang dikelola secara mandiri dan profesional serta bebas dari benturan kepentingan dan pengaruh atau tekanan dari pihak manapun yang tidak sesuai dengan ketentuan peraturan perundang-undangan dan nilai etika serta standar, prinsip, dan praktik.<br>Independence includes a state that is managed independently and professionally and is free from conflicts of interest and influence or pressure from any party that is not in accordance with laws and regulations and ethical values as well as standards, principles, and practices. |
| **Kewajaran**<br>**Fairness** | Kewajaran (*fairness*) mencakup kesetaraan, keseimbangan, dan keadilan di dalam memenuhi hak Pemangku Kepentingan yang timbul berdasarkan perjanjian, ketentuan peraturan perundang-undangan, dan nilai etika serta standar, prinsip, dan praktik.<br>Fairness includes equality, balance, and justice in fulfilling Stakeholder rights arising from agreements, provisions of laws and regulations, and ethical values as well as standards, principles, and practices. |

## Dasar Hukum Pelaksanaan

Penerapan GCG Bank Sinarmas berpedoman pada ketentuan berikut.

## Legal Basis for Implementation

The implementation of GCG by Bank Sinarmas is guided by the following provisions.

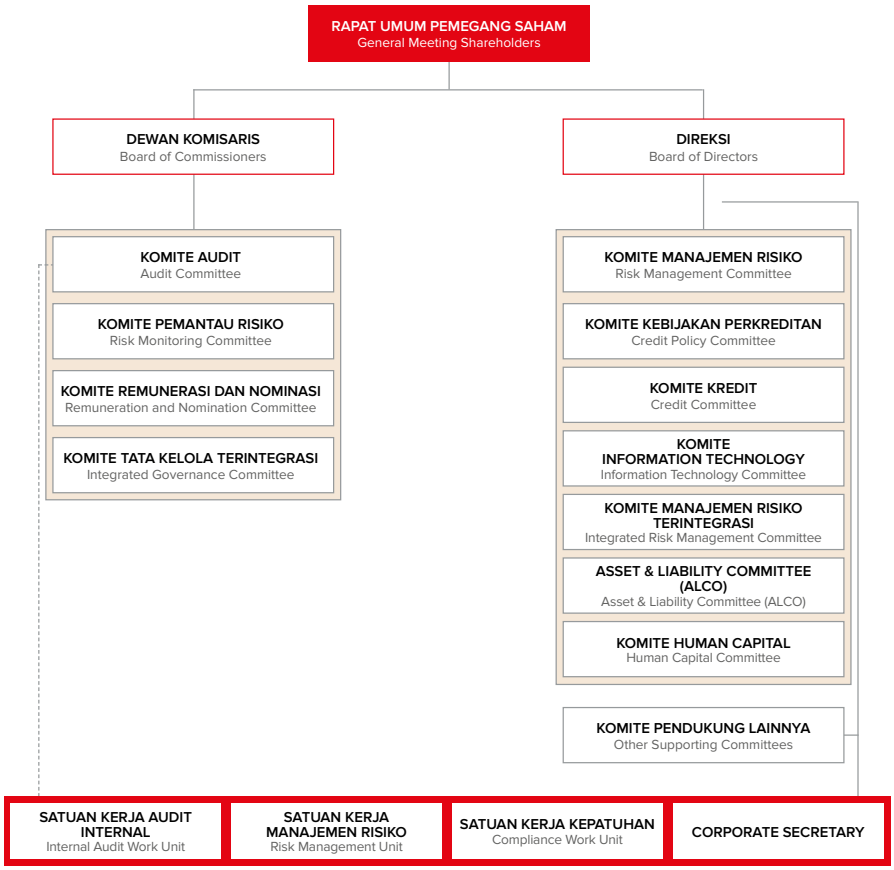
| | |
|---|---|
| Undang-Undang Republik Indonesia | • Undang-Undang Republik Indonesia No.10 Tahun 1998 tentang perubahan atas Undang-undang No. 7 tahun 1992 tentang Perbankan.<br>• Undang-Undang Republik Indonesia No. 40 Tahun 2007 tentang Perseroan Terbatas.<br>• Undang-Undang Republik Indonesia No. 4 Tahun 2023 tentang Pengembangan dan Penguatan Sektor Keuangan.<br>• Law of the Republic of Indonesia No. 10 of 1998 concerning amendments to Law No. 7 of 1992 concerning Banking.<br>• Law of the Republic of Indonesia No. 40 of 2007 concerning Limited Liability Companies.<br>• Law of the Republic of Indonesia No. 4 of 2023 concerning Development and Strengthening of the Financial Sector. |
| Peraturan Otoritas Jasa Keuangan | • Peraturan Otoritas Jasa Keuangan No. 17 tahun 2023 tanggal 14 September 2023 tentang Penerapan Tata Kelola bagi Bank Umum.<br>• Peraturan Otoritas Jasa Keuangan No. 12/POJK.03/2021 tanggal 30 Juli 2021 tentang Bank Umum.<br>• Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tanggal 17 Maret 2017 tentang Penerapan Tata Kelola bagi Bank Umum.<br>• Peraturan Otoritas Jasa Keuangan No. 21/POJK.04/2015 tanggal 16 November 2015 tentang Penerapan Pedoman Tata Kelola Perusahaan Terbuka.<br>• Peraturan Otoritas Jasa Keuangan No. 8/POJK.04/2015 tanggal 26 Juni 2015 tentang Situs Web Emiten atau Perusahaan Publik.<br>• Surat Edaran Otoritas Jasa Keuangan No. 32/ SEOJK.04/2015 Tanggal 17 November 2015 tentang Pedoman Tata Kelola Perusahaan Terbuka.<br>• Regulation of the Financial Services Authority No. 17 of 2023, dated September 14, 2023, concerning Implementation of Governance for Commercial Banks.<br>• Regulation of the Financial Services Authority No. 12/POJK.03/2021 dated July 30, 2021, concerning Commercial Banks.<br>• Circular Letter of the Financial Services Authority No. 13/SEOJK.03/2017 dated March 17, 2017, concerning the Implementation of Governance for Commercial Banks.<br>• Regulation of the Financial Services Authority No. 21/POJK.04/2015 dated November 16, 2015, concerning the Implementation of Guidelines for Public Company Governance.<br>• Financial Services Authority Regulation No. 8/POJK.04/2015 dated June 26, 2015, concerning Websites of Issuers or Public Companies.<br>• Financial Services Authority Circular Letter No. 32/SEOJK.04/2015 dated November 17, 2015, concerning Guidelines for Public Company Governance. |

## Organisasi Penerapan Tata Kelola

Struktur GCG yang belaku di Bank Sinarmas hingga akhir tahun buku 2024 diungkapkan sebagai berikut.

## Organization of Governance Implementation

The GCG structure applicable at Bank Sinarmas until the end of the 2024 financial year is disclosed as follows.



Dewan Komisaris telah membentuk komite di bawahnya untuk membantu dan meningkatkan pelaksanaan tugas dan fungsi Dewan Komisaris. Komite-komite tersebut adalah:

1. Komite Audit;
2. Komite Pemantau Risiko;
3. Komite Remunerasi dan Nominasi; dan
4. Komite Tata Kelola Terintegrasi.

Direksi bersama jajaran manajemen Bank bertugas untuk mengelola, mengendalikan, serta bertanggung jawab atas penerapan tata kelola di Bank, dibantu oleh Satuan Kerja Audit Internal, *Risk Management Group*, Satuan Kerja Kepatuhan, *Corporate Secretary*, serta Komite di tingkat Direksi, yaitu:

1. Komite Manajemen Risiko;
2. Komite Kebijakan Perkreditan;
3. Komite Kredit;
4. Komite *Information Technology*;
5. Komite Manajemen Risiko Terintegrasi;
6. Asset & Liability Committee (ALCO); dan
7. Komite *Human Capital*.

## Komitmen dan Realisasi GCG

### Penerapan Tata Kelola

GCG Bank Sinarmas diimplementasikan secara komprehensif dan terstruktur, yang diintegrasikan dalam 3 (tiga) aspek dasar berikut.

The Board of Commissioners has formed committees under it to assist and improve the implementation of the duties and functions of the Board of Commissioners. These committees are:

1. Audit Committee;
2. Risk Monitoring Committee;
3. Remuneration and Nomination Committee; and
4. Integrated Governance Committee.

The Board of Directors, together with the Bank's management, is tasked with managing, controlling, and being responsible for the implementation of governance in the Bank, assisted by the Internal Audit Work Unit, Risk Management Group, Compliance Work Unit, Corporate Secretary, and Committees at the Board of Directors level, namely:

1. Risk Management Committee;
2. Credit Policy Committee;
3. Credit Committee;
4. Information Technology (IT) Committee;
5. Integrated Risk Management Committee
6. Asset & Liability Committee (ALCO); and
7. Human Capital Committee.

## GCG Commitment and Realization

### Implementation of Governance

Bank Sinarmas' GCG is implemented comprehensively and structured, which is integrated into the following 3 (three) basic aspects.

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| *Governance Structure* | Penilaian *governance structure* bertujuan untuk menilai kecukupan struktur dan infrastruktur tata kelola Bank agar proses penerapan prinsip GCG menghasilkan *outcome* yang sesuai dengan harapan pemangku kepentingan Bank. Adapun yang termasuk dalam struktur GCG Bank, yakni Direksi, Dewan Komisaris, komite-komite, dan satuan kerja pada Bank. Sementara itu, yang termasuk infrastruktur tata kelola Bank, antara lain kebijakan dan prosedur Bank, sistem informasi manajemen, serta tugas pokok dan fungsi masing-masing struktur organisasi. Bank Sinarmas telah memiliki kecukupan struktur dan prosedur dalam menerapkan GCG.<br>The governance structure assessment aims to assess the adequacy of the Bank›s governance structure and infrastructure, ensuring that the process of implementing GCG principles produces outcomes that are in accordance with the expectations of the Bank›s stakeholders. The Bank›s GCG structure includes the Board of Directors, Board of Commissioners, committees, and work units at the Bank. Meanwhile, the Bank›s governance infrastructure includes the Bank›s policies and procedures, management information systems, and the main tasks and functions of each organizational structure. Bank Sinarmas has had adequate structures and procedures in implementing GCG. |
| *Governance Process* | Penilaian *governance process* bertujuan untuk menilai efektivitas proses penerapan prinsip GCG yang didukung oleh kecukupan struktur dan infrastruktur tata kelola Bank sehingga menghasilkan *outcome* yang sesuai dengan harapan pemangku kepentingan Bank. Bank Sinarmas telah menerapkan prinsip-prinsip GCG secara efektif.<br>The governance process assessment aims to assess the effectiveness of the GCG principle implementation process supported by the adequacy of the Bank›s governance structure and infrastructure, ensuring that it produces outcomes that are in accordance with the expectations of the Bank›s stakeholders. Bank Sinarmas has implemented GCG principles effectively. |

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| *Governance outcome* | Penilaian *governance outcome* bertujuan untuk menilai kualitas *outcome* yang memenuhi harapan pemangku kepentingan Bank yang merupakan hasil proses penerapan prinsip GCG serta didukung oleh kecukupan struktur dan infrastruktur tata kelola Bank.<br>Yang termasuk dalam *outcome* mencakup aspek kualitatif dan aspek kuantitatif, antara lain:<br>a. Kecukupan transparansi laporan;<br>b. Kepatuhan terhadap peraturan perundang-undangan;<br>c. Perlindungan konsumen;<br>d. Objektivitas dalam melakukan penilaian (*assessment*) atau audit;<br>e. Kinerja Bank seperti rentabilitas, efisiensi, dan permodalan; dan/atau<br>f. Peningkatan atau penurunan kepatuhan terhadap ketentuan dan penyelesaian permasalahan yang dihadapi Bank, seperti *fraud*, pelanggaran Batas Maksimum Pemberian Kredit (BMPK), dan pelanggaran ketentuan terkait laporan bank kepada Otoritas Jasa Keuangan.<br>The governance outcome assessment aims to assess the quality of outcomes that meet the expectations of the Bank's stakeholders, which are the result of the GCG principle implementation process and are supported by the adequacy of the Bank's governance structure and infrastructure.<br>The outcomes include qualitative and quantitative aspects, including:<br>a. Adequate transparency of reports;<br>b. Compliance with laws and regulations;<br>c. Consumer protection;<br>d. Objectivity in conducting assessments or audits;<br>e. Bank performance such as profitability, efficiency, and capitalization; and/or<br>f. Increase or decrease in compliance with provisions and resolution of problems faced by the Bank, such as fraud, violation of the Legal Lending Limit (BMPK), and violation of provisions related to bank reports to the Financial Services Authority. |





## Tujuan Penerapan Tata Kelola

Bank Sinarmas berkewajiban untuk melaksanakan kegiatan usahanya yang disesuaikan dengan prinsip-prinsip GCG dalam rangka:

1. Meningkatkan kesungguhan Manajemen dalam menerapkan prinsip-prinsip keterbukaan, akuntabilitas, tanggung jawab, independensi, kewajaran dan kehati-hatian dalam pengelolaan Bank
2. Meningkatkan kinerja Bank, efisiensi dan pelayanan kepada stakeholders;
3. Melindungi kepentingan para pemangku kepentingan; dan
4. Meningkatkan kepatuhan terhadap peraturan perundang-undangan serta Nilai-nilai Etika (code of conduct) yang berlaku secara umum pada industri perbankan.

## *Road Map* Penerapan Tata Kelola

Bank Sinarmas secara konsisten dan berkelanjutan melaksanakan tata kelola sesuai ketentuan internal dan eksternal. Melalui *road map* penerapan tata kelola, Bank terus menyempurnakan dan menyesuaikan upaya tersebut guna memberikan kontribusi positif bagi semua pemangku kepentingan.

## Objective of the Implementation of Good Corporate Governance

Bank Sinarmas is obliged to carry out its business activities in accordance with the principles of GCG in order to:

1. Increase the seriousness of Management in implementing the principles of transparency, accountability, responsibility, independence, fairness, and prudence in managing the Bank
2. Improve the Bank's performance, efficiency, and service to stakeholders;
3. Protect the interests of stakeholders; and
4. Increase compliance with laws and regulations and Ethical Values (code of conduct) that generally apply to the banking industry.

## Road Map for the Implementation of Good Corporate Governance

Bank Sinarmas consistently and continuously implements good corporate governance in accordance with internal and external provisions. Through the road map for implementing good corporate governance, the Bank continues to refine and adjust these efforts in order to provide a positive contribution to all stakeholders.

| Tahun<br>Year | ***Road Map* Penerapan Tata Kelola**<br>Road Map for the Implementation of Good Corporate Governance |
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| 2024 | • Bank Sinarmas telah melakukan pengkinian atas ketentuan internal yaitu berupa Kebijakan Tata Kelola Perusahaan (Good Governance Corporate) Versi 3.0 dan SOP Tata Urutan Ketentuan Internal (Manual Level) Versi 3.0.<br>• Bank Sinarmas telah menunjuk dan mengangkat Direktur yang membawahi fungsi kepatuhan berdasarkan persetujuan OJK melalui SK Anggota Dewan Komisioner No KEPR-109/D.03/2024 tanggal 30 Agustus 2024 dan RUPS Luar Biasa pada tanggal 28 Oktober 2024.<br>• Bank Sinarmas telah melakukan penilaian sendiri atas penerapan tata kelola yang baik pada Bank sebanyak 2 (dua) kali dalam 1 (satu) tahun serta menyusun dan menyampaikan laporan pelaksanaan tata kelola pada akhir tahun 2024.<br>• Bank Sinarmas telah menyelenggarakan Rapat Direksi, Rapat Dewan Komisaris, maupun Rapat Direksi bersama dengan Dewan Komisaris;<br>• Direksi Bank Sinarmas telah menindaklanjuti temuan audit atau pemeriksaan dan rekomendasi dari Satuan Kerja Audit Internal Bank, auditor ekstern, hasil pengawasan Otoritas Jasa Keuangan, dan/atau hasil pengawasan otoritas dan lembaga lain.<br>• Bank Sinarmas telah memastikan kepatuhan terhadap ketentuan Otoritas Jasa Keuangan dan ketentuan perundang-undangan dengan melakukan, antara lain:<br>- Membuat analisa dampak dan menyusun tindak lanjut serta melakukan sosialisasi terhadap ketentuan Otoritas Jasa Keuangan dan Bank Indonesia serta peraturan perundang-undangan yang berlaku;<br>- Memberikan opini terhadap rancangan produk dan aktivitas Bank agar sesuai dengan ketentuan regulator dan peraturan perundang-undangan yang berlaku; dan<br>- Memastikan kebijakan, ketentuan, sistem dan prosedur telah sesuai dengan ketentuan Otoritas Jasa Keuangan dan peraturan perundang-undangan yang berlaku maka Satuan Kerja Kepatuhan menyampaikan opini kepatuhan atau *review* terhadap kebijakan, prosedur, ketentuan internal Bank yang akan diterbitkan.<br>• Pelaksanaan pengujian kepatuhan atau *compliance testing* terhadap aktivitas hapus buku, Kantor Cabang atas Penerapan Program Anti Pencucian Uang, Pencegahan Pendanaan Terorisme dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal (APU PPT & PPPSPM, pelindungan konsumen di jasa perbankan, pelindungan konsumen terfokus pada bagian ringkasan informasi produk dan layanan, pemenuhan kepatuhan kewajiban pendaftaran sistem elektronik milik Bank ke Kominfo, perjanjian kredit Bank Sinarmas dalam kaitannya dengan pelindungan konsumen di Sektor Jasa Keuangan.<br>• Meningkatkan kesadaran atas budaya kepatuhan melalui program kampanye kepatuhan yang dilakukan ke seluruh Unit Kerja dan jaringan Cabang Bank baik melalui media komunikasi internal dalam bentuk *Compliance Info* dan kampanye anti penyuapan.<br>• Bank Sinarmas has updated its internal provisions in the form of the Corporate Governance Policy (Good Governance Corporate) Version 3.0 and the SOP for Internal Provisions Sequence (Manual Level) Version 3.0.<br>• Bank Sinarmas has appointed and elected a Director who oversees the compliance function based on the approval of the OJK through the Decree of the Member of the Board of Commissioners No. KEPR-109/D.03/2024 dated August 30, 2024, and the Extraordinary GMS on October 28, 2024.<br>• Bank Sinarmas has conducted a self-assessment of the implementation of good governance at the Bank 2 (two) times in 1 (one) year and prepared and submitted a report on the implementation of governance at the end of 2024.<br>• Bank Sinarmas has held a Board of Directors Meeting, a Board of Commissioners Meeting, and a Joint Board of Directors Meeting with the Board of Commissioners;<br>• The Board of Directors of Bank Sinarmas has followed up on audit findings or examinations and recommendations from the Bank›s Internal Audit Work Unit, external auditors, the results of supervision by the Financial Services Authority, and/or the results of supervision by other authorities and institutions.<br>• Bank Sinarmas has ensured compliance with the provisions of the Financial Services Authority and the provisions of the laws and regulations by, among others:<br>- Conducting impact analysis and preparing follow-up actions and conducting socialization of the provisions of the Financial Services Authority and Bank Indonesia as well as applicable laws and regulations;<br>- Providing opinions on the design of the Bank›s products and activities to comply with the provisions of the regulator and applicable laws and regulations; and<br>- Ensuring that policies, provisions, systems, and procedures are in accordance with the provisions of the Financial Services Authority and applicable laws and regulations, the Compliance Work Unit submits a compliance opinion or review of the Bank›s policies, procedures, and internal provisions to be issued.<br>• Implementation of compliance testing on write-off activities, Branch Offices for the Implementation of Anti-Money Laundering Programs, Counter-Terrorism Financing and Prevention of Proliferation Financing of Weapons of Mass Destruction (APU PPT & PPPSPM), consumer protection in banking services, consumer protection focused on the summary of product and service information, fulfillment of compliance obligations for registering the Bank›s electronic system with the Ministry of Communication and Information, and Bank Sinarmas credit agreements in relation to consumer protection in the Financial Services Sector.<br>• Increasing awareness of the culture of compliance through compliance campaign programs carried out in all Work Units and the Bank›s branch network, both through internal communication media in the form of Compliance Info and anti-bribery campaigns. |

| Tahun<br>Year | ***Road Map* Penerapan Tata Kelola**<br>Road Map for the Implementation of Good Corporate Governance |
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| 2023 | • Dalam penerapan GCG, Bank Sinarmas telah melakukan pengkinian atas Kebijakan Tata Kelola Perusahaan yang dimiliki. Hal ini sejalan sebagaimana diatur oleh Otoritas Jasa keuangan melalui Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Penerapan Tata Kelola Bagi Bank Umum;<br>• Bank Sinarmas melakukan penilaian sendiri atas penerapan tata kelola yang baik 2 kali dalam 1 tahun;<br>• Direksi Bank Sinarmas menindaklanjuti temuan audit atau pemeriksaan dan rekomendasi dari Satuan Kerja Audit Internal Bank, auditor ekstern, hasil pengawasan Otoritas Jasa Keuangan, dan/atau hasil pengawasan otoritas dan lembaga lain.<br>• Bank Sinarmas menyelenggarakan Rapat Direksi, Rapat Dewan Komisaris, maupun Rapat Direksi bersama dengan Dewan Komisaris;<br>• Bank Sinarmas memastikan kepatuhan terhadap ketentuan Otoritas Jasa Keuangan dan ketentuan perundang-undangan dengan melakukan, antara lain:<br>- Membuat analisa dampak dan menyusun tindak lanjut serta melakukan sosialisasi terhadap ketentuan Otoritas Jasa Keuangan dan Bank Indonesia serta peraturan perundang-undangan yang berlaku;<br>- Memberikan opini terhadap rancangan produk dan aktivitas Bank agar sesuai dengan ketentuan regulator dan peraturan perundang-undangan yang berlaku; dan<br>• Bank Sinarmas memastikan kebijakan, ketentuan, sistem dan prosedur telah sesuai dengan ketentuan Otoritas Jasa Keuangan dan peraturan perundang-undangan yang berlaku, maka Satuan Kerja Kepatuhan mengeluarkan opini atau *review* terhadap kebijakan, prosedur, ketentuan yang akan diterbitkan.<br>• In implementing GCG, Bank Sinarmas has updated its Corporate Governance Policy. This is in line with the provisions of the Financial Services Authority through Financial Services Authority Regulation No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks;<br>• Bank Sinarmas conducts a self-assessment of the implementation of good governance twice a year;<br>• The Board of Directors of Bank Sinarmas follows up on audit findings or examinations and recommendations from the Bank›s Internal Audit Work Unit, external auditors, the results of supervision by the Financial Services Authority, and/or the results of supervision by other authorities and institutions.<br>• Bank Sinarmas holds Board of Directors Meetings, Board of Commissioners Meetings, and Joint Board of Directors Meetings with the Board of Commissioners;<br>• Bank Sinarmas ensures compliance with the provisions of the Financial Services Authority and statutory provisions by, among others:<br>- Making impact analysis and preparing follow-up actions and conducting socialization of the provisions of the Financial Services Authority and Bank Indonesia as well as applicable laws and regulations;<br>- Providing opinions on the design of the Bank›s products and activities, ensuring that they comply with the provisions of regulators and applicable laws and regulations; and<br>• Bank Sinarmas ensures that policies, provisions, systems, and procedures are in accordance with the provisions of the Financial Services Authority and applicable laws and regulations, and then the Compliance Work Unit issues an opinion or review of the policies, procedures, and provisions to be issued. |
| 2022 | • Pengkinian Standar Operasional Prosedur (SOP) Tata Urutan Ketentuan Internal (Manual Level) Versi 2.0;<br>• Pengkinian Kebijakan Kepatuhan Versi 2.0;<br>• Pengkinian SOP Kepatuhan Terintegrasi Konglomerasi Keuangan Sinar Mas Financial Services Versi 2.0;<br>• Pelaksanaan Rapat Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas Semester I dan II Tahun 2022.<br>• Penyampaian Laporan Tidak Terstruktur kepada Otoritas Jasa Keuangan secara daring melalui SIPENA;<br>• Pelaksanaan *Compliance Testing* kepada Divisi *Bancassurance*, Kantor Cabang atas Penerapan Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme (APU-PPT), Treasury Group, Credit Card Group, MSME Group, dan SnD Group; dan<br>• Meningkatkan kesadaran atas Budaya Kepatuhan melalui program Compliance Campaign yang dilakukan ke seluruh Unit Kerja dan jaringan Cabang Bank baik melalui media komunikasi internal maupun melalui pelatihan kelas dan *e-learning*.<br>• Updating the Standard Operating Procedure (SOP) for Internal Provisions Sequence (Manual Level) Version 2.0;<br>• Updating the Compliance Policy Version 2.0;<br>• Updating the Integrated Compliance SOP of the Sinar Mas Financial Services Financial Conglomerate Version 2.0;<br>• Implementation of the Integrated Governance Committee Meeting of the Sinar Mas Financial Conglomerate Semester I and II of 2022.<br>• Submission of Unstructured Reports to the Financial Services Authority online through SIPENA;<br>• Implementation of Compliance Testing to the Bancassurance Division, Branch Offices for the Implementation of Anti-Money Laundering and Counter-Terrorism Financing (APU-PPT), Treasury Group, Credit Card Group, MSME Group, and SnD Group; and<br>• Increasing awareness of Compliance Culture through the Compliance Campaign program carried out in all Work Units and the Bank›s Branch network, both through internal communication media and through classroom training and e-learning. |
| 2021 | • Pelaksanaan Rapat Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas Semester I dan II Tahun 2021;<br>• Pelaporan tindak lanjut oleh Lembaga Jasa Keuangan (LJK) dalam Konglomerasi Keuangan terhadap hasil pengawasan Otoritas Jasa Keuangan maupun hasil pengawasan otoritas lainnya kepada Direksi Entitas Utama;<br>• Penyusunan dan Penyampaian Rencana Korporasi PT. Bank Sinarmas Tbk. tahun 2022-2026;<br>• Memperkuat modal Bank oleh Pemegang Saham Pengendali Bank sebesar Rp1,4 triliun;<br>• Penyampaian Laporan Tidak Terstruktur kepada Otoritas Jasa Keuangan secara daring melalui SIPENA;<br>• Peningkatan awareness terkait compliance info kepada seluruh lini Bank Sinarmas;<br>• Pelaksanaan *Compliance Testing* kepada Divisi *Investment Product* (Reksadana), proses *Open Account* (Digital dan Konvensional), Syariah, CAC berkaitan dengan kepatuhan sesuai dengan Peraturan yang diatur oleh regulator; dan<br>• Pelaksanaan Sosialisasi terhadap implementasi GCG kepada seluruh lini Bank Sinarmas.<br>• Implementation of Integrated Governance Committee Meeting of Sinar Mas Financial Conglomerate Semester I and II of 2021;<br>• Reporting of follow-up actions by Financial Services Institutions (LJK) in the Financial Conglomerate on the results of supervision by the Financial Services Authority and the results of supervision by other authorities to the Board of Directors of the Main Entity;<br>• Preparation and Submission of the Corporate Plan of PT. Bank Sinarmas Tbk. for 2022-2026;<br>• Strengthening the Bank›s capital by the Bank›s Controlling Shareholders by Rp 1.4 trillion;<br>• Submission of Unstructured Reports to the Financial Services Authority online through SIPENA;<br>• Increasing awareness regarding compliance info to all lines of Bank Sinarmas;<br>• Implementation of Compliance Testing for the Investment Product Division (Mutual Funds), Open Account process (Digital and Conventional), Sharia, and CAC related to compliance in accordance with the Regulations set by the regulator; and<br>• Implementation of socialization of GCG implementation to all lines of Bank Sinarmas. |

| Tahun<br>Year | ***Road Map* Penerapan Tata Kelola**<br>Road Map for the Implementation of Good Corporate Governance |
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| 2020 | • Pengkinian Kebijakan Tata Kelola Bank Sinarmas;<br>• Pengkinian Kebijakan Tata Kelola Terintegrasi (Konglomerasi Sinar Mas);<br>• Pelaksanaan Rapat Komite Tata Kelola Terintegrasi Sinarmas Semester I dan II Tahun 2020;<br>• Pembuatan *Compliance Monitoring System*;<br>• Pemenuhan Pelaporan Bank kepada Regulator melalui daring, seperti APOLO dan OBOX maupun luring;<br>• Penerbitan *Corporate Charter*;<br>• Peningkatan rangkaian aktivitas implementasi kegiatan APU-PPT;<br>• Peningkatan *awareness* terkait *compliance* info kepada seluruh lini Bank Sinarmas; dan<br>• Pelaksanaan Sosialisasi terhadap implementasi GCG kepada seluruh lini Bank Sinarmas dan Konglomerasi Keuangan Sinar Mas.<br>• Updating the Bank Sinarmas Governance Policy;<br>• Updating the Integrated Governance Policy (Sinar Mas Conglomerate);<br>• Implementation of Integrated Governance Committee Meeting of Sinarmas Semester I and II of 2020;<br>• Creation of Compliance Monitoring System;<br>• Fulfillment of Bank Reporting to Regulators online, such as APOLO and OBOX or offline;<br>• Issuance of Corporate Charter;<br>• Improvement of APU-PPT implementation activity series;<br>• Increase awareness related to compliance info to all lines of Bank Sinarmas; and<br>• Implementation of Socialization regarding GCG implementation to all lines of Bank Sinarmas and Sinar Mas Financial Conglomerate. |
| 2019 | • Pemenuhan pelaporan Bank kepada regulator;<br>• Pelaksanaan sosialisasi terkait praktik pelaksanaan GCG melalui internal class dan *e-learning*;<br>• Peningkatan awareness terkait *compliance culture* kepada seluruh lini Bank Sinarmas melalui *compliance campaign*;<br>• Penerbitan *Compliance Charter* dan *Internal Audit Charter*;<br>• Pembaruan kebijakan-kebijakan internal Bank yang terkait dengan tata kelola;<br>• Peningkatan rangkaian aktivitas implementasi kegiatan APU-PPT;<br>• Penyampaian Rencana Aksi Keuangan Berkelanjutan;<br>• Peluncuran *Compliance Manual Leveling*;<br>• Melakukan pemantauan secara berkala dan intensif pada *regulatory parameter*;<br>• Penyesuaian Kode Etik karyawan;<br>• Penyusunan *risk indicator* bidang usaha; dan<br>• Memperkuat modal Bank dengan pelaksanaan *exercise* waran oleh Pemegang Saham Pengendali Bank sebesar Rp1 triliun.<br>• Fulfillment of Bank reporting to regulators;<br>• Implementation of socialization related to GCG implementation practices through internal classes and e-learning;<br>• Increase awareness related to compliance culture to all lines of Bank Sinarmas through compliance campaigns;<br>• Issuance of Compliance Charter and Internal Audit Charter;<br>• Updates to the Bank›s internal policies related to governance;<br>• Improvement of the series of APU-PPT implementation activities;<br>• Submission of the Sustainable Finance Action Plan;<br>• Launch of Compliance Manual Leveling;<br>• Conduct regular and intensive monitoring of regulatory parameters;<br>• Adjustment of the employee Code of Ethics;<br>• Preparation of risk indicators for business fields; and<br>• Strengthening the Bank›s capital by exercising warrants by the Bank›s Controlling Shareholders amounting to Rp 1 trillion. |
| 2018 | • Menyelaraskan dan menyempurnakan praktik pelaksanaan GCG dengan peraturan perundang-undangan yang berlaku;<br>• Penyesuaian kebijakan-kebijakan pendukung pelaksanaan tata kelola Bank Sinarmas;<br>• Perubahan Struktur Organisasi;<br>• Pengangkatan anggota Direksi melalui ketentuan tata kelola yang berlaku;<br>• Perubahan susunan anggota Direksi melalui ketentuan tata kelola yang berlaku;<br>• Pengungkapan Agenda RUPS Tahunan dan RUPS Luar Biasa beserta penjelasannya pada situs web Bank Sinarmas; dan<br>• Publikasi Keputusan RUPS Tahunan dan RUPS Luar Biasa beserta penjelasannya pada situs web Bank Sinarmas.<br>• Aligning and refining GCG implementation practices with applicable laws and regulations;<br>• Adjustment of supporting policies for the implementation of Bank Sinarmas governance;<br>• Changes in Organizational Structure;<br>• Appointment of members of the Board of Directors through applicable governance provisions;<br>• Changes in the composition of the Board of Directors through applicable governance provisions;<br>• Disclosure of the Agenda of the Annual GMS and Extraordinary GMS along with explanations on the Bank Sinarmas website; and<br>• Publication of the Resolutions of the Annual GMS and Extraordinary GMS along with explanations on the Bank Sinarmas website. |
| 2017 | • Penyelarasan pelaksanaan tata kelola Bank Sinarmas dengan peraturan Otoritas Jasa Keuangan tentang Penerapan Tata Kelola Bagi Bank Umum;<br>• Penyesuaian kebijakan-kebijakan pendukung pelaksanaan tata kelola Bank Sinarmas;<br>• Meraih penghargaan *The Top 50 Emiten MIDcap* yang diselenggarakan oleh Indonesian *Institute for Corporate Director* (IICD);<br>• Perubahan Anggaran Dasar Bank;<br>• Pengunduran diri dan pengangkatan anggota Direksi melalui ketentuan tata kelola yang berlaku;<br>• Perubahan susunan anggota Direksi melalui ketentuan tata kelola yang berlaku;<br>• Pengungkapan Agenda RUPS Tahunan dan RUPS Luar Biasa beserta penjelasannya pada situs web Bank Sinarmas; dan<br>• Publikasi Keputusan RUPS Tahunan dan RUPS Luar Biasa beserta penjelasannya pada situs web Bank Sinarmas.<br>• Alignment of the implementation of Bank Sinarmas governance with the Financial Services Authority regulations on the Implementation of Governance for Commercial Banks;<br>• Adjustment of supporting policies for the implementation of Bank Sinarmas governance;<br>• Achieving the Top 50 MIDcap Issuer award organized by the Indonesian Institute for Corporate Director (IICD);<br>• Changes to the Bank›s Articles of Association;<br>• Resignation and appointment of members of the Board of Directors through applicable governance provisions;<br>• Changes in the composition of the Board of Directors through applicable governance provisions;<br>• Disclosure of the Agenda of the Annual GMS and Extraordinary GMS along with explanations on the Bank Sinarmas website; and<br>• Publication of the Resolutions of the Annual GMS and Extraordinary GMS along with explanations on the Bank Sinarmas website. |

| Tahun<br>Year | ***Road Map* Penerapan Tata Kelola**<br>Road Map for the Implementation of Good Corporate Governance |
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| 2016 | • Aksi Korporasi (*Corporate Action*) Penawaran Umum Terbatas (PUT II);<br>• Penetapan Bank Sinarmas sebagai Entitas Utama;<br>• Penetapan Susunan Anggota Komite Tata Kelola Terintegrasi dan Komite Manajemen Risiko Terintegrasi;<br>• Kebijakan melalui Pedoman Tata Kelola Terintegrasi;<br>• Perubahan Susunan Dewan Pengawas Syariah;<br>• Perubahan Anggaran Dasar Bank;<br>• Peningkatan Modal Bank;<br>• Pengungkapan Agenda RUPS Tahunan dan RUPS Luar Biasa beserta penjelasannya pada situs web Bank Sinarmas; dan<br>• Publikasi Keputusan RUPS Tahunan dan RUPS Luar Biasa beserta penjelasannya pada situs web Bank Sinarmas<br>• Corporate Action Limited Public Offering (PUT II);<br>• Determination of Bank Sinarmas as the Main Entity;<br>• Determination of the Composition of the Integrated Governance Committee and the Integrated Risk Management Committee;<br>• Policy through the Integrated Governance Guidelines;<br>• Changes to the Composition of the Sharia Supervisory Board;<br>• Changes to the Bank›s Articles of Association;<br>• Increase in Bank Capital;<br>• Disclosure of the Agenda of the Annual GMS and Extraordinary GMS along with explanations on the Bank Sinarmas website; and<br>• Publication of the Resolutions of the Annual GMS and Extraordinary GMS along with explanations on the Bank Sinarmas website. |
| 2015 | • Juara ke-III Kategori Listed Private Financial pada *Annual Report Award* 2015;<br>• Kebijakan Pedoman *Whistleblowing System*;<br>• Pengembangan praktik pelaksanaan GCG dengan peraturan perundang-undangan yang berlaku;<br>• Pengangkatan anggota Direksi melalui ketentuan tata kelola yang berlaku;<br>• Perubahan Anggaran Dasar Bank;<br>• Perubahan susunan anggota Direksi melalui ketentuan tata kelola yang berlaku;<br>• Pengungkapan Agenda RUPS Tahunan dan RUPS Luar Biasa beserta penjelasannya pada situs web Bank Sinarmas; dan<br>• Publikasi Keputusan RUPS Tahunan.<br>• Third Place in the Listed Private Financial Category at the 2015 Annual Report Award;<br>• Whistleblowing System Guidelines Policy;<br>• Development of GCG implementation practices with applicable laws and regulations;<br>• Appointment of members of the Board of Directors through applicable governance provisions;<br>• Amendments to the Bank›s Articles of Association;<br>• Changes to the composition of the Board of Directors through applicable governance provisions;<br>• Disclosure of the Agenda of the Annual GMS and Extraordinary GMS along with its explanation on the Bank Sinarmas website; and<br>• Publication of the Resolutions of the Annual GMS. |

## Tinjauan Penerapan Pedoman Tata Kelola Bank Perusahaan Terbuka

Penerapan GCG di Bank telah disesuaikan dengan Pedoman Tata Kelola Perusahaan Terbuka yang disusun berdasarkan Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017, sebagai berikut.

## Review of the Implementation of the Guidelines for Governance of Public Bank Companies

The implementation of GCG in the Bank has been adjusted to the Guidelines for Public Company Governance prepared based on the Circular Letter of the Financial Services Authority No. 13/SEOJK.03/2017, as follows.

| Prinsip<br>Principle | Rekomendasi<br>Recommendation | Pemenuhan<br>Compliance | Implementasi di Bank Sinarmas<br>Implementation at Bank Sinarmas |
|---|---|---|---|
| **Aspek 1: Hubungan Perusahaan Terbuka dengan Pemegang Saham dalam Menjamin Hak-hak Pemegang Saham**<br>**Aspect 1: Relationship between Public Companies and Shareholders in Guaranteeing Shareholder Rights** | | | |
| **Prinsip 1:** Meningkatkan Nilai Penyelenggaraan Rapat Umum Pemegang Saham (RUPS)<br>**Principle 1:** Increasing the Value of Holding General Meeting of Shareholders (GMS) | **Rekomendasi 1.1:**<br>Perusahaan Terbuka memiliki cara atau prosedur teknis pengumpulan suara (voting), baik secara terbuka maupun tertutup, yang mengedepankan independensi dan kepentingan Pemegang Saham.<br>**Recommendation 1.1**:<br>Public Companies have technical methods or procedures for collecting votes (voting), both in an open and close manner, which prioritize the independence and interests of Shareholders. | Terpenuhi<br>Complied | Mekanisme pemungutan suara RUPS Tahunan dituangkan dalam Tata Tertib Rapat. Tata Tertib RUPS Tahunan tanggal 16 Mei 2024 dapat diakses melalui situs web Bank. Dokumen tersebut juga dibagikan kepada Pemegang Saham dan ditampilkan pada layar saat pembawa acara membacakan pokok-pokok tata tertib selama penyelenggaraan RUPS.<br>The voting mechanism of the Annual GMS is set out in the Meeting Procedures. The Procedures of the Annual GMS dated May 16, 2024 can be accessed through the Bank›s website. The document is also distributed to Shareholders and displayed on the screen when the MC reads the main points of the procedures during the GMS. |
| | **Rekomendasi 1.2:**<br>Seluruh anggota Direksi dan anggota Dewan Komisaris Perusahaan Terbuka hadir dalam RUPS Tahunan.<br>**Recommendation 1.2:**<br>All members of the Board of Directors and members of the Board of Commissioners of the Public Company are present at the Annual GMS. | Terpenuhi<br>Complied | Seluruh anggota Dewan Komisaris dan Direksi menghadiri RUPS Tahunan tanggal 16 Mei 2024.<br>All members of the Board of Commissioners and Board of Directors attended the Annual GMS on May 16, 2024. |

| Prinsip<br>Principle | Rekomendasi<br>Recommendation | Pemenuhan<br>Compliance | Implementasi di Bank Sinarmas<br>Implementation at Bank Sinarmas |
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| | **Rekomendasi 1.3:**<br>Ringkasan risalah RUPS tersedia dalam situs web Perusahaan Terbuka paling sedikit selama 1 tahun.<br>**Recommendation 1.3:**<br>A summary of the minutes of the GMS is available on the Public Company›s website for at least 1 year. | Terpenuhi<br>Complied | Ringkasan Risalah RUPS 2014-2024 tersedia di situs web Bank (www.banksinarmas.com) pada laman Hubungan Investor.<br>Summary of Minutes of the 2014-2024 GMS is available on the Bank›s website (www.banksinarmas.com) on the Investor Relations page. |
| **Prinsip 2:** Meningkatkan Kualitas Komunikasi Perusahaan Terbuka dengan Pemegang Saham atau Investor<br>**Principle 2:** Improving the Quality of Public Company Communication with Shareholders or Investors | **Rekomendasi 2.1:**<br>Perusahaan Terbuka memiliki suatu kebijakan komunikasi dengan Pemegang Saham atau investor.<br>**Recommendation 2.1:**<br>Public Companies have a communication policy with Shareholders or investors. | Terpenuhi<br>Complied | Kebijakan komunikasi dengan Pemegang Saham atau Investor tertuang dalam Surat Keputusan Direksi No. SK.102/2021/PRESDIR-Corsec. Adapun komunikasi yang dilakukan oleh Bank, di antaranya melalui pelaksanaan RUPS; Paparan Publik (*Public Expose*); publikasi Laporan Keuangan Bulanan, Triwulanan, dan Tahunan; serta melakukan keterbukaan informasi secara akurat dan tepat waktu. Bank Sinarmas juga menyediakan informasi alamat kantor pusat dan cabang, alamat *e-mail*, dan nomor telepon, baik dalam situs web maupun Laporan Tahunan, akses media sosial, dan *contact center* sebagai sarana bagi Pemegang Saham maupun investor agar dapat melakukan komunikasi dengan Bank secara mudah.<br>The communication policy with Shareholders or Investors is stated in the Decree of the Board of Directors No. SK.102/2021/PRESDIR-Corsec. The communication carried out by the Bank includes the implementation of the GMS; Public Expose; publication of Monthly, Quarterly, and Annual Financial Reports; and providing accurate and timely information disclosure. Bank Sinarmas also provides information on the addresses of head offices and branches, e-mail addresses, and telephone numbers, both on the website and in the Annual Report, social media access, and contact centers as a means for Shareholders and investors to communicate with the Bank easily. |
| | **Rekomendasi 2.2:**<br>Perusahaan Terbuka mengungkapkan kebijakan komunikasi Perusahaan Terbuka dengan Pemegang Saham atau investor dalam situs web.<br>**Recommendation 2.2:**<br>Public Companies disclose the Public Company›s communication policy with Shareholders or investors on the website. | Terpenuhi<br>Complied | Bank memiliki Kebijakan Komunikasi dengan Pemegang Saham dan Investor melalui Surat Keputusan No. SK.102/2021/PRESDIR-CorSec. yang dapat menjadi acuan bagi anak perusahaan.<br>The Bank has a Communication Policy with Shareholders and Investors through Decree No. SK.102/2021/PRESDIR-CorSec. which can be a reference for subsidiaries. |
| Aspek 2: Fungsi dan Peran Dewan Komisaris<br>Aspect 2: Functions and Roles of the Board of Commissioners | | | |
| **Prinsip 3:** Memperkuat Keanggotaan dan Komposisi Dewan Komisaris<br>**Principle 3:** Strengthening the Membership and Composition of the Board of Commissioners | **Rekomendasi 3.1:**<br>Penentuan jumlah anggota Dewan Komisaris mempertimbangkan kondisi Perusahaan Terbuka.<br>**Recommendation 3.1:**<br>Determination of the number of members of the Board of Commissioners takes into account the conditions of the Public Company. | Terpenuhi<br>Complied | Bank Sinarmas memiliki kebijakan penetapan calon anggota Direksi, Dewan Komisaris, dan/atau Dewan Pengawas Syariah sebagai pedoman bagi Komite Remunerasi dan Nominasi dalam proses nominasi anggota Dewan Komisaris dengan mempertimbangkan kebutuhan, kondisi, dan kemampuan Bank. Per 31 Desember 2024, Bank Sinarmas memiliki 3 orang Dewan Komisaris, dengan 2 orang di antaranya merupakan Komisaris Independen. Jumlah anggota Dewan Komisaris tidak melebihi jumlah anggota Direksi.<br>Bank Sinarmas has a policy for determining candidates for members of the Board of Directors, Board of Commissioners, and/or Sharia Supervisory Board as a guideline for the Remuneration and Nomination Committee in the nomination process for members of the Board of Commissioners by considering the needs, conditions, and capabilities of the Bank. As of December 31, 2024, Bank Sinarmas has 3 members of the Board of Commissioners, 2 of whom are Independent Commissioners. The number of members of the Board of Commissioners does not exceed the number of members of the Board of Directors. |
| | **Rekomendasi 3.2:**<br>Penentuan komposisi anggota Dewan Komisaris memperhatikan keberagaman keahlian, pengetahuan, dan pengalaman yang dibutuhkan.<br>**Recommendation 3.2:**<br>Determining the composition of the members of the Board of Commissioners takes into account the diversity of expertise, knowledge and experience required. | Terpenuhi<br>Complied | Dewan Komisaris Bank Sinarmas memiliki beragam latar belakang pendidikan, keahlian, pengetahuan, dan pengalaman yang diperlukan untuk mendukung efektivitas pengawasan terhadap perkembangan bisnis Bank.<br>The Board of Commissioners of Bank Sinarmas has a variety of educational backgrounds, expertise, knowledge and experience needed to support effective supervision of the Bank›s business development. |

| Prinsip<br>Principle | Rekomendasi<br>Recommendation | Pemenuhan<br>Compliance | Implementasi di Bank Sinarmas<br>Implementation at Bank Sinarmas |
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| **Prinsip 4:** Meningkatkan Kualitas Pelaksanaan Tugas dan Tanggung Jawab Dewan Komisaris<br>**Principle 4:** Improving the Quality of Implementation of the Duties and Responsibilities of the Board of Commissioners | **Rekomendasi 4.1:**<br>Dewan Komisaris mempunyai kebijakan penilaian sendiri (*self-assessment*) untuk menilai kinerja Dewan Komisaris.<br>**Recommendation 4.1:**<br>The Board of Commissioners has a self-assessment policy to assess the performance of the Board of Commissioners. | Terpenuhi<br>Complied | Penilaian kinerja Dewan Komisaris dilakukan melalui *self-assessment* GCG, sebagai bagian dari penilaian GCG yang sesuai dengan Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017.<br>The performance assessment of the Board of Commissioners is carried out through GCG self-assessment, as part of the GCG assessment in accordance with Circular Letter of the Financial Services Authority No. 13/SEOJK.03/2017. |
| | **Rekomendasi 4.2:**<br>Kebijakan penilaian sendiri (*self-assessment*) untuk menilai kinerja Dewan Komisaris, diungkapkan melalui Laporan Tahunan Perusahaan Terbuka.<br>**Recommendation 4.2:**<br>Self-assessment policy to assess the performance of the Board of Commissioners, disclosed through the Annual Report of the Public Company. | Terpenuhi<br>Complied | Uraian lengkap terkait penilaian kinerja Dewan Komisaris telah diungkapkan dalam Laporan Tahunan dan Keberlanjutan ini.<br>A complete description of the Board of Commissioners' performance assessment has been disclosed in this Annual and Sustainability Report. |
| | **Rekomendasi 4.3:**<br>Dewan Komisaris mempunyai kebijakan terkait pengunduran diri anggota Dewan Komisaris apabila terlibat dalam kejahatan keuangan.<br>**Recommendation 4.3:**<br>The Board of Commissioners has a policy regarding the resignation of members of the Board of Commissioners if they are involved in financial crimes. | Terpenuhi<br>Complied | Kebijakan pengunduran diri Dewan Komisaris tercantum dalam Pedoman Dewan Komisaris yang ditetapkan melalui Surat Keputusan SK.041/2018/PRESDIR tentang Pedoman Dewan Komisaris Rev 2.0 PT. Bank Sinarmas Tbk.<br>The resignation policy of the Board of Commissioners is stated in the Board of Commissioners Guidelines stipulated through Decree SK.041/2018/PRESDIR concerning the Board of Commissioners Guidelines Rev 2.0 of PT. Bank Sinarmas Tbk. |
| | **Rekomendasi 4.4:**<br>Dewan Komisaris atau Komite yang menjalankan Fungsi Nominasi dan Remunerasi menyusun kebijakan suksesi dalam proses nominasi anggota Direksi.<br>**Recommendation 4.4:**<br>The Board of Commissioners or the Committee that carries out the Nomination and Remuneration Function shall prepare a succession policy in the nomination process for members of the Board of Directors. | Terpenuhi<br>Complied | Kebijakan terkait nominasi Direksi ditetapkan melalui Surat Keputusan SK.046/2019/PRESDIR-Corsec tentang Piagam Remunerasi dan Nominasi Revisi 3.0 PT. Bank Sinarmas Tbk.<br>The policy regarding the nomination of the Board of Directors is stipulated through Decree SK.046/2019/PRESDIR-Corsec concerning the Remuneration and Nomination Charter Revision 3.0 of PT. Bank Sinarmas Tbk. |

| Prinsip<br>Principle | Rekomendasi<br>Recommendation | Pemenuhan<br>Compliance | Implementasi di Bank Sinarmas<br>Implementation at Bank Sinarmas |
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| Aspek 3: Fungsi dan Peran Direksi<br>Aspect 3: Functions and Roles of the Board of Directors | | | |
| **Prinsip 5:** Memperkuat Keanggotaan dan Komposisi Direksi<br>**Principle 5:** Strengthening the Membership and Composition of the Board of Directors | **Rekomendasi 5.1:**<br>Penentuan jumlah anggota Direksi mempertimbangkan kondisi perusahaan terbuka, serta efektivitas dalam pengambilan keputusan.<br>**Recommendation 5.1:**<br>Determination of the number of members of the Board of Directors takes into account the conditions of the public company, as well as the effectiveness of decision-making. | Terpenuhi<br>Complied | Bank Sinarmas memiliki kebijakan penetapan calon anggota Direksi, Dewan Komisaris, dan/atau Dewan Pengawas Syariah sebagai pedoman bagi Komite Remunerasi dan Nominasi dalam proses nominasi anggota Direksi dengan mempertimbangkan kebutuhan, kondisi, dan kemampuan Bank. Per 31 Desember 2024, Direksi Bank beranggotakan 6 orang, disesuaikan dengan kompleksitas Bank. Jumlah tersebut lebih banyak dari anggota Dewan Komisaris.<br>Bank Sinarmas has a policy of determining candidates for members of the Board of Directors, Board of Commissioners, and/or Sharia Supervisory Board as a guideline for the Remuneration and Nomination Committee in the nomination process for members of the Board of Directors by considering the needs, conditions, and capabilities of the Bank. As of December 31, 2024, the Bank›s Board of Directors consists of 6 members, adjusted to the complexity of the Bank. This number is more than the members of the Board of Commissioners.<br>Direktur Utama / President Director : Frenky Tirtowijoyo<br>Direktur / Director : Miko Andidjaja<br>Direktur / Director : Ekajaya Ongny Putra<br>Direktur / Director : Enny Kamal<br>Direktur / Director : Sendy<br>Direktur / Director : Amandalia Johanes |
| | **Rekomendasi 5.2:**<br>Penentuan komposisi anggota Direksi memperhatikan, keberagaman keahlian, pengetahuan, dan pengalaman yang dibutuhkan.<br>**Recommendation 5.2:**<br>Determination of the composition of the Board of Directors members takes into account the diversity of expertise, knowledge, and experience required. | Terpenuhi<br>Complied | Direksi Bank Sinarmas memiliki beragam latar belakang pendidikan, keahlian, pengetahuan, dan pengalaman yang diperlukan untuk mengoptimalkan pengambilan keputusan dan meningkatkan kinerja Bank.<br>The Board of Directors of Bank Sinarmas has a variety of educational backgrounds, skills, knowledge and experience needed to optimize decision making and improve the Bank›s performance. |
| | **Rekomendasi 5.3:**<br>Anggota Direksi yang membawahi bidang akuntansi atau keuangan memiliki keahlian dan/atau pengetahuan di bidang akuntansi.<br>**Recommendation 5.3:**<br>Board of Directors' members who oversee accounting or finance have expertise and/or knowledge in the field of accounting. | Terpenuhi<br>Complied | Bapak Frenky Tirtowijoyo selaku Direktur yang membawahi bidang akuntansi dan keuangan memiliki latar belakang pendidikan, pengetahuan, keahlian serta pengalaman, sebagaimana telah diungkapkan pada uraian Profil Direksi dalam Laporan Tahunan dan Keberlanjutan ini.<br>Mr. Frenky Tirtowijoyo as the Director in charge of accounting and finance has an educational background, knowledge, expertise and experience, as disclosed in the description of the Board of Directors› Profile in this Annual and Sustainability Report. |

| Prinsip<br>Principle | Rekomendasi<br>Recommendation | Pemenuhan<br>Compliance | Implementasi di Bank Sinarmas<br>Implementation at Bank Sinarmas |
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| **Prinsip 6:** Meningkatkan Kualitas Pelaksanaan Tugas dan Tanggung Jawab Direksi<br>**Principle 6:** Improving the Quality of the Implementation of the Duties and Responsibilities of the Board of Directors | **Rekomendasi 6.1:**<br>Direksi mempunyai kebijakan penilaian sendiri (*self-assessment*) untuk menilai kinerja Direksi.<br>**Recommendation 6.1:**<br>The Board of Directors has a self-assessment policy to assess the performance of the Board of Directors | Terpenuhi<br>Complied | Penilaian kinerja Direksi dilakukan melalui *self-assessment* GCG, sebagai bagian dari penilaian GCG yang sesuai dengan Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017.<br>The Board of Directors› performance assessment is carried out through GCG self-assessment, as part of the GCG assessment in accordance with Circular Letter of the Financial Services Authority No. 13/SEOJK.03/2017. |
| | **Rekomendasi 6.2:**<br>Kebijakan penilaian sendiri (*self-assessment*) untuk menilai kinerja Direksi, diungkapkan melalui Laporan Tahunan Perusahaan Terbuka.<br>**Recommendation 6.2:**<br>Self-assessment policy to assess the performance of the Board of Directors, disclosed through the Annual Report of the Public Company. | Terpenuhi<br>Complied | Uraian lengkap terkait penilaian kinerja Direksi telah diungkapkan dalam Laporan Tahunan dan Keberlanjutan ini.<br>A complete description of the Board of Directors› performance assessment has been disclosed in this Annual and Sustainability Report. |
| | **Rekomendasi 6.3:**<br>Direksi mempunyai kebijakan terkait pengunduran diri anggota Dewan Komisaris apabila terlibat dalam kejahatan keuangan.<br>**Recommendation 6.3:**<br>The Board of Directors has a policy regarding the resignation of members of the Board of Commissioners if they are involved in financial crimes. | Terpenuhi<br>Complied | Kebijakan pengunduran diri Direksi tercantum dalam Pedoman Direksi Rev 2.0/2018.<br>The policy for resignation of the Board of Directors is stated in the Board of Directors Guidelines Rev 2.0/2018. |
| Aspek 4: Partisipasi Pemangku Kepentingan<br>Aspect 4: Stakeholder Participation | | | |
| **Prinsip 7:** Meningkatkan Aspek Tata Kelola Perusahaan melalui Partisipasi Pemangku Kepentingan<br>**Principle 7:** Improving Corporate Governance Aspects through Stakeholder Participation | **Rekomendasi 7.1:**<br>Perusahaan Terbuka memiliki kebijakan untuk mencegah terjadinya *insider trading*.<br>**Recommendation 7.1:**<br>Public Companies have policies to prevent insider trading. | Terpenuhi<br>Complied | Kebijakan untuk mencegah *insider trading* tercantum dalam Kode Etik dan Pedoman Tingkah Laku yang telah diunggah pada situs web Bank.<br>The policy to prevent insider trading is stated in the Code of Ethics and Code of Conduct, which have been uploaded on the Bank›s website. |

| Prinsip<br>Principle | Rekomendasi<br>Recommendation | Pemenuhan<br>Compliance | Implementasi di Bank Sinarmas<br>Implementation at Bank Sinarmas |
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| | **Rekomendasi 7.2:**<br>Perusahaan Terbuka memiliki kebijakan anti korupsi dan *anti-fraud*.<br>**Recommendation 7.2:**<br>Public Companies have anti-corruption and anti-fraud policies. | Terpenuhi<br>Complied | Bank Sinarmas telah memiliki ketentuan internal terkait anti penyuapan yang diatur pada Surat Keputusan No. SK.039/2021/Dir1-Comp tentang SOP Sistem Manajemen Anti Penyuapan. SOP Sistem Manajemen Anti Penyuapan ini merupakan bentuk pernyataan prinsip dan komitmen Bank Sinarmas dalam mendukung praktik anti suap di lingkungan Bank Sinarmas. Selain itu, SOP Sistem Manajemen Anti Penyuapan berfungsi sebagai informasi atau panduan oleh Manajemen, karyawan, dan/atau pihak-pihak yang bekerja untuk dan atas nama Bank Sinarmas tentang cara mengenali, memahami, menyampaikan, dan menangani masalah suap.<br><br>Kebijakan *Anti-Fraud* Bank merupakan landasan pokok penerapan strategi *Anti-Fraud* melalui 4 pilar sistem pengendalian *fraud*, yaitu Pencegahan *Fraud*, Deteksi *Fraud*, Investigasi, Pelaporan dan Pengenaan Sanksi *Fraud*, Pemantauan, Evaluasi, serta Tindak Lanjut *Fraud*. Kerangka kerja *Anti-Fraud* Bank Sinarmas dibangun berlandaskan tata kelola perusahaan (*corporate governance*) dengan penerapan yang berfokus pada pengendalian fraud, budaya etika yang didukung dengan kode etik (*code of conduct*), *anti-fraud culture & awareness*, serta *whistleblowing system*.<br>Bank Sinarmas has internal provisions related to anti-bribery regulated in Decree No. SK.039/2021/Dir1-Comp concerning the Anti-Bribery Management System SOP. This Anti-Bribery Management System SOP is a form of statement of principles and commitment of Bank Sinarmas in supporting anti-bribery practices in the Bank Sinarmas environment. In addition, the Anti-Bribery Management System SOP functions as information or guidance for Management, employees, and/or parties working for and on behalf of Bank Sinarmas on how to recognize, understand, convey, and handle bribery issues.<br><br>The Bank›s Anti-Fraud Policy is the main foundation for implementing the Anti-Fraud strategy through 4 pillars of the fraud control system, namely Fraud Prevention, Fraud Detection, Investigation, Reporting and Imposition of Fraud Sanctions, Monitoring, Evaluation, and Fraud Follow-up. Bank Sinarmas› Anti-Fraud framework is built on the basis of corporate governance with an implementation that focuses on fraud control, an ethical culture supported by a code of conduct, anti-fraud culture & awareness, and a whistleblowing system. |
| | **Rekomendasi 7.3:**<br>Perusahaan Terbuka memiliki kebijakan tentang seleksi dan peningkatan kemampuan pemasok atau vendor.<br>**Recommendation 7.3:**<br>The Public Company has a policy on the selection and improvement of supplier or vendor capabilities. | Terpenuhi<br>Complied | Kebijakan Manajemen Vendor telah diunggah pada situs web Bank. Kebijakan ini meliputi tata cara pemilihan vendor, hubungan dengan vendor, pembelian barang dan sistem pembayaran.<br>Vendor Management Policy has been uploaded on the Bank›s website. This policy covers procedures for vendor selection, vendor relations, purchasing goods and payment systems. |

| Prinsip<br>Principle | Rekomendasi<br>Recommendation | Pemenuhan<br>Compliance | Implementasi di Bank Sinarmas<br>Implementation at Bank Sinarmas |
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| | **Rekomendasi 7.4:**<br>Perusahaan Terbuka memiliki kebijakan tentang pemenuhan hak-hak kreditur.<br>**Recommendation 7.4:**<br>Public Companies have policies regarding the fulfillment of creditor rights. | Terpenuhi<br>Complied | Bank Sinarmas menjamin pemenuhan hak-hak kreditur dalam:<br>• Hak untuk mendapat informasi yang jelas.<br>• Hak untuk menyampaikan saran/masukan, keluhan/pengaduan serta memperoleh penyelesaiannya.<br>• Hak untuk menerima hak-hak kreditur sesuai dengan perjanjian yang disepakati.<br>• Hak untuk mendapatkan akses Laporan Tahunan dan Laporan Keuangan yang telah diaudit.<br>• Hak untuk mendapatkan informasi dan kemudahan akses pengumuman, pemanggilan dan hasil RUPS sesuai dengan tata cara yang diatur dalam regulasi terkait RUPS.<br><br>Dalam pelaksanaannya, Bank Sinarmas berkomitmen untuk selalu memenuhi hak-hak kreditur sesuai kesepakatan yang ditetapkan bersama terkait hak-hak kreditur dalam hubungan antara Bank dengan Kreditur.<br><br>Bank Sinarmas guarantees the fulfillment of creditors' rights in:<br>• The right to obtain clear information.<br>• The right to submit suggestions/input, complaints/complaints as well as to obtain the settlement.<br>• The right to receive creditor rights in accordance with the agreed agreement.<br>• The right to obtain access to audited Annual Reports and Financial Statements.<br>• The right to obtain information and easy access to announcements, invitations and GMS results in accordance with the procedures stipulated in the regulations related to GMS.<br><br>In its implementation, Bank Sinarmas is committed to always fulfill the creditor's rights in accordance with the agreement stipulated together related to the creditor's rights in the relationship between the Bank and the Creditor. |
| | **Rekomendasi 7.5:**<br>Perusahaan Terbuka memiliki kebijakan sistem *whistleblowing*.<br>**Recommendation 7.5:**<br>Public Companies have a whistleblowing system policy. | Terpenuhi<br>Complied | Kebijakan *Whistleblowing System* telah diunggah pada situs web Bank. Kebijakan tersebut mencakup jenis pelanggaran yang dapat dilaporkan, cara pengaduan, perlindungan dan jaminan kerahasiaan pelapor, penanganan pengaduan, pihak yang mengelola aduan, hasil penanganan dan tindak lanjut pengaduan sesuai dengan ketentuan Otoritas Jasa Keuangan. Uraian lengkap terkait Kebijakan *Whistleblowing System* diungkapkan pada Laporan Tahunan.<br>The Whistleblowing System Policy has been uploaded on the Bank›s website. The policy covers the types of violations that can be reported, how to file a complaint, protection and guarantee of confidentiality of the whistleblower, handling of complaints, the party managing the complaint, the results of handling and follow-up of complaints in accordance with the provisions of the Financial Services Authority. A complete description of the Whistleblowing System Policy is disclosed in the Annual Report. |
| | **Rekomendasi 7.6:**<br>Perusahaan Terbuka memiliki kebijakan pemberian insentif jangka panjang kepada Direksi dan karyawan.<br>**Recommendation 7.6:**<br>The Public Company has a policy of providing long-term incentives to the Board of Directors and employees. | Terpenuhi<br>Complied | Bank Sinarmas telah memiliki Kebijakan Remunerasi Variabel bagi Direksi dan Karyawan yang masuk dalam kriteria material risk takers, dengan menerapkan deferral sebagian nominal dari Bonus Tahunan selama 3 tahun sejalan dengan POJK 45/2015.<br>Bank Sinarmas has a Variable Remuneration Policy for Directors and Employees who are included in the criteria of material risk takers, by applying deferrals of a nominal portion of the Annual Bonus for 3 years in accordance with POJK 45/2015. |

| Prinsip<br>Principle | Rekomendasi<br>Recommendation | Pemenuhan<br>Compliance | Implementasi di Bank Sinarmas<br>Implementation at Bank Sinarmas |
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| Aspek 5: Keterbukaan Informasi<br>Aspect 5: Information Disclosure | | | |
| **Prinsip 8:** Meningkatkan Pelaksanaan Keterbukaan Informasi<br>**Principle 8:** Improving the Implementation of Information Disclosure | **Rekomendasi 8.1:**<br>Perusahaan Terbuka memanfaatkan penggunaan teknologi informasi secara lebih luas selain situs web sebagai media keterbukaan informasi.<br>**Recommendation 8.1:**<br>Public Companies utilize information technology more widely in addition to websites as a medium for information disclosure. | Terpenuhi<br>Complied | Selain situs web perusahaan, Bank Sinarmas juga memanfaatkan teknologi informasi lainnya, seperti *e-mail*, media cetak, media sosial (seperti Instagram, Facebook, X, Instagram, Tiktok, LinkedIn, dan Youtube), layar/TV di kantor cabang, ATM, dan SIMOBI sebagai saluran media untuk keterbukaan informasi.<br>In addition to the company website, Bank Sinarmas also utilizes other information technologies, such as e-mail, print media, social media (such as Instagram, Facebook, X, Instagram, Tiktok, LinkedIn, and Youtube), screens/TVs at branch offices, ATMs, and SIMOBI as media channels for information disclosure. |
| | **Rekomendasi 8.2:**<br>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.<br>**Recommendation 8.2:**<br>The Annual Report of a Public Company discloses the ultimate beneficial owner in the ownership of shares of the public company of at least 5%, in addition to the disclosure of the ultimate beneficial owner in the ownership of shares of the Public Company through Majority and Controlling Shareholders. | Terpenuhi<br>Complied | Bank telah mengungkapkan informasi mengenai Pemegang Saham yang memiliki 5% atau lebih saham Bank dalam Laporan Tahunan dan Keberlanjutan pada bagian Komposisi Pemegang Saham.<br>The Bank has disclosed information regarding Shareholders who own 5% or more of the Bank›s shares in the Annual and Sustainability Report in the Shareholder Composition section. |



## Penilaian Penerapan GCG Tahun 2024

Bank Sinarmas melaksanakan penilaian sendiri (*self-assessment)* sebagai bukti kepatuhan Bank terhadap 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. Penilaian tersebut dilaksanakan 2 (dua) kali dalam 1 (satu) tahun untuk posisi akhir bulan Juni dan akhir bulan Desember dengan penyampaian laporan kepada Otoritas Jasa Keuangan dilaksanakan sesuai dengan periode penilaian Tingkat Kesehatan Bank paling lambat 31 Juli dan dan 31 Desember.

### Pelaksana Penilaian

*Self-assessment* GCG dilakukan secara internal dengan melibatkan Dewan Komisaris, Direksi, Pejabat Eksekutif, dan unit-unit independen di Bank. Keterlibatan berbagai pihak yang relevan ini bertujuan untuk menghasilkan evaluasi yang komprehensif dan terstruktur terhadap efektivitas sistem tata kelola serta kualitas hasil tata kelola Bank.

### Kriteria Penilaian

Pelaksanaan *self-assessment* Bank Sinarmas dilakukan secara komprehensif dan terstruktur, mengacu pada kriteria yang tercantum dalam Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tentang Penerapan Tata Kelola Bagi Bank Umum. Berdasarkan peraturan tersebut, penilaian dilakukan dengan mempertimbangkan 11 faktor penilaian penerapan GCG, terdiri dari:

1. Pelaksanaan Tugas dan Tanggung Jawab Direksi;

## GCG Implementation Assessment in 2024

Bank Sinarmas conducted a self-assessment as proof of the Bank's compliance with Financial Services Authority Regulation No. 17 of 2023 and Financial Services Authority Circular Letter No. 13/SEOJK.03/2017 concerning the Implementation of Governance for Commercial Banks. The assessment is carried out 2 (two) times in 1 (one) year for the positions at the end of June and the end of December, with the submission of reports to the Financial Services Authority carried out in accordance with the Bank's Soundness Level assessment period no later than July 31 and December 31.

### Party Conducting the Assessment

The GCG self-assessment is carried out internally by involving the Board of Commissioners, the Board of Directors, Executive Officers, and independent units at the Bank. The involvement of various relevant parties aims to produce a comprehensive and structured evaluation of the effectiveness of the Bank's governance system and the quality of the Bank's governance results.

### Assessment Criteria

The implementation of Bank Sinarmas' self-assessment is carried out comprehensively and structured, referring to the criteria stated in the Financial Services Authority Circular Letter No. 13/SEOJK.03/2017 on the Implementation of Governance for Commercial Banks. Based on the regulation, the assessment is carried out by considering 11 assessment factors for the implementation of GCG, consisting of:

1. Implementation of Duties and Responsibilities of the Board of Directors;

2. Pelaksanaan Tugas dan Tanggung Jawab Dewan Komisaris;
3. Kelengkapan dan Pelaksanaan Tugas Komite;
4. Penanganan Benturan Kepentingan;
5. Penerapan Fungsi Kepatuhan Bank;
6. Penerapan Fungsi Audit Internal;
7. Penerapan Fungsi Audit Ekstern;
8. Penerapan Fungsi Manajemen Risiko dan Pengendalian Internal;
9. Penyediaan Dana Kepada Pihak Terkait (Related Party) dan Debitur Besar (Large Exposures);
10. Transparansi Kondisi Keuangan dan Non-Keuangan Bank, Laporan Pelaksanaan GCG dan Laporan Internal; dan
11. Rencana Strategis Bank.

2. Implementation of Duties and Responsibilities of the Board of Commissioners;
3. Completeness and Implementation of Committee Duties;
4. Handling of Conflicts of Interest;
5. Implementation of the Bank's Compliance Function;
6. Implementation of the Internal Audit Function;
7. Implementation of the External Audit Function;
8. Implementation of the Risk Management and Internal Control Function;
9. Provision of Funds to Related Parties and Large Exposures;
10. Transparency of the Bank's Financial and Non-Financial Conditions, GCG Implementation Reports, and Internal Reports; and
11. Bank's Strategic Plan.

### Hasil Penilaian

Hasil penilaian *self-assessment* Bank Sinarmas untuk tahun 2024 adalah "**2**", dengan rincian sebagai berikut.

### Assessment Results

The results of Bank Sinarmas' self-assessment for 2024 are "2," with the following details.

| **Faktor Penilaian Tata Kelola**<br>Governance Assessment Factors | **Peringkat (Nilai)**<br>Rating (Score) |
|---|---|
| Pelaksanaan Tugas dan Tanggung Jawab Direksi<br>Implementation of Duties and Responsibilities of the Board of Directors | 2 |
| Pelaksanaan Tugas dan Tanggung Jawab Dewan Komisaris<br>Implementation of Duties and Responsibilities of the Board of Commissioners | 2 |
| Kelengkapan dan Pelaksanaan Tugas Komite<br>Completeness and Implementation of Committee Duties | 2 |
| Penanganan Benturan Kepentingan<br>Handling of Conflicts of Interest | 2 |
| Penerapan Fungsi Kepatuhan Bank<br>Implementation of Bank Compliance Function | 2 |
| Penerapan Fungsi Audit Internal<br>Implementation of Internal Audit Function | 2 |
| Penerapan Fungsi Audit Ekstern<br>Implementation of External Audit Function | 2 |
| Penerapan Fungsi Manajemen Risiko dan Pengendalian Internal<br>Implementation of Risk Management and Internal Control Function | 2 |
| Penyediaan Dana Kepada Pihak Terkait (*Related Party*) dan Debitur Besar (*Large Exposures*)<br>Provision of Funds to Related Parties and Large Exposures | 2 |
| Transparansi Kondisi Keuangan dan Non-Keuangan Bank, Laporan Pelaksanaan GCG dan Laporan Internal<br>Transparency of Bank Financial and Non-Financial Conditions, GCG Implementation Reports and Internal Reports | 2 |
| Rencana Strategis Bank<br>Bank Strategic Plan | 2 |
| **Peringkat Komposit**<br>Composite Rating | **2** |

**Analisis**

Berdasarkan hasil *self-assessment* untuk periode pelaporan 2024, maka dapat disimpulkan bahwa penerapan GCG Bank berada pada peringkat 2.

**Analysis**

Based on the self-assessment results for the 2024 reporting period, it can be concluded that the Bank's GCG implementation rating is 2.

| Analisis<br>Analysis | |
|---|---|
| Pelaksanaan Tugas dan Tanggung Jawab Direksi<br>Implementation of Duties and Responsibilities of the Board of Directors | • Bank telah memiliki Direksi berjumlah 6 (enam) orang yang terdiri dari 1 (satu) Direktur Utama dan 5 (lima) Direktur.<br>• Bank telah menunjuk dan mengangkat Direktur yang membawahi fungsi kepatuhan berdasarkan persetujuan OJK melalui SK Anggota Dewan Komisioner No KEPR-109/D03/2024 tanggal 30 Agustus 2024 dan RUPS Luar Biasa pada tanggal 28 Oktober 2024.<br>• Jumlah, komposisi, integritas dan kompetensi anggota Direksi sesuai dengan ukuran dan kompleksitas usaha Bank serta telah memenuhi ketentuan yang berlaku.<br>• Direksi telah memiliki Pedoman dan Tata Tertib Kerja. Pedoman Direksi mengatur tugas dan tanggung jawab Direksi secara umum, sedangkan Tata Tertib Kerja Direksi secara garis besar mengatur teknis dalam pelaksanaan tugas dan tanggung jawab Direksi.<br>• Pelaksanaan tugas dan tanggung jawab Direksi berjalan efektif dan memenuhi prinsip-prinsip Tata Kelola.<br>• Direksi telah menyelenggarakan rapat dengan efektif dan efisien dan hasil rapat dituangkan dalam risalah rapat serta didokumentasikan dengan baik.<br>• Aspek transparansi anggota Direksi cukup baik dan tidak pernah melanggar ketentuan/perundangan yang berlaku.<br>• The Bank has a Board of Directors consisting of 6 (six) people, including 1 (one) President Director and 5 (five) Directors.<br>• The Bank has appointed and elected a Director who oversees the compliance function based on the approval of the OJK through the Decree of the Members of the Board of Commissioners No. KEPR-109/D03/2024 dated August 30, 2024, and the Extraordinary GMS on October 28, 2024.<br>• The number, composition, integrity, and competence of members of the Board of Directors are in accordance with the size and complexity of the Bank's business and have complied with applicable provisions.<br>• The Board of Directors has a Guideline and Work Procedures. The Board of Directors Guidelines regulate the duties and responsibilities of the Board of Directors in general, while the Board of Directors Work Procedures broadly regulate the technical aspects of implementing the duties and responsibilities of the Board of Directors.<br>• The implementation of the duties and responsibilities of the Board of Directors is effective and meets the principles of Governance.<br>• The Board of Directors has held meetings effectively and efficiently, and the results of the meetings are stated in the minutes of the meeting and are well documented.<br>• The transparency aspect of the Board of Directors members is quite good and has never violated applicable provisions/ legislation. |
| Pelaksanaan Tugas dan Tanggung Jawab Dewan Komisaris<br>Implementation of Duties and Responsibilities of the Board of Commissioners | • Jumlah, komposisi, integritas, dan kompetensi anggota Dewan Komisaris telah sesuai dengan ketentuan yang berlaku;<br>• Dewan Komisaris tidak merangkap jabatan sebagai Komisaris, Direksi, atau Pejabat Eksekutif pada Bank lain;<br>• Dewan Komisaris telah memiliki Pedoman dan Tata Tertib Kerja yang antara lain mencantumkan mengenai keanggotaan, masa jabatan, nilai-nilai, ketentuan rapat secara umum, waktu kerja, dan lain sebagainya;<br>• Pelaksanaan tugas dan tanggung jawab Dewan Komisaris telah berjalan efektif sesuai dengan Anggaran Dasar Bank;<br>• Dalam melaksanakan fungsi pengawasan, Dewan Komisaris telah membentuk Komite Audit, Komite Pemantau Risiko, serta Komite Remunerasi dan Nominasi;<br>• Dewan Komisaris telah menyelenggarakan rapat dengan efektif dan efisien serta hasil rapat telah dituangkan dalam notulen rapat dan di administrasikan dengan baik; dan<br>• Aspek transparansi anggota Dewan Komisaris cukup baik dan telah sesuai dengan ketentuan yang berlaku.<br>• The number, composition, integrity, and competence of the members of the Board of Commissioners are in accordance with applicable provisions;<br>• The Board of Commissioners does not hold concurrent positions as Commissioners, Directors, or Executive Officers at other Banks;<br>• The Board of Commissioners has a Guideline and Work Procedures, which include, among others, membership, term of office, values, general meeting provisions, working hours, and so forth;<br>• The implementation of the duties and responsibilities of the Board of Commissioners has been effective in accordance with the Bank's Articles of Association;<br>• In carrying out its supervisory function, the Board of Commissioners has formed an Audit Committee, a Risk Monitoring Committee, and a Remuneration and Nomination Committee;<br>• The Board of Commissioners has held meetings effectively and efficiently, and the results of the meetings have been stated in the minutes of the meeting and properly administered; and<br>• The transparency aspect of the members of the Board of Commissioners is quite good and in accordance with applicable provisions. |

| | Analisis<br>Analysis |
|---|---|
| Kelengkapan dan Pelaksanaan Tugas Komite<br>Completeness and Implementation of Committee Duties | • Komposisi dan kompetensi seluruh anggota Komite-komite telah memenuhi ketentuan regulator;<br>• Komite Audit, Komite Pemantau Risiko, serta Komite Remunerasi dan Nominasi telah menjalankan fungsinya dengan efektif tergambar dari Rapat Komite yang telah dilaksanakan sesuai dengan agenda yang ditetapkan;<br>• Tugas dan tanggung jawab Komite secara keseluruhan berjalan efektif;<br>• Hasil Rapat Komite merupakan rekomendasi yang dapat dimanfaatkan dan menjadi masukan bagi Dewan Komisaris dalam melakukan fungsi pengawasan;<br>• Hasil rapat Komite dituangkan dalam risalah rapat dan didokumentasikan dengan baik, sampai saat ini tidak terjadi perbedaan pendapat (dissenting opinions)<br>• The composition and competence of all members of the Committees have met the regulatory requirements;<br>• The Audit Committee, Risk Monitoring Committee, and Remuneration and Nomination Committee have carried out their functions effectively, as reflected in the Committee Meetings that have been carried out in accordance with the established agenda;<br>• The duties and responsibilities of the Committees as a whole have been carried out effectively;<br>• The results of the Committee Meetings are recommendations that can be utilized and become input for the Board of Commissioners in carrying out their supervisory function;<br>• The results of the Committee meetings are stated in the minutes of the meeting and are well documented, and to date there have been no dissenting opinions |
| Penanganan Benturan Kepentingan<br>Handling Conflict of Interest | • Bank telah memiliki kebijakan, sistem, dan prosedur penyelesaian benturan kepentingan pada Surat Keputusan No. SK.053/2020/PRESDIR-CorSec tentang Transaksi Afiliasi dan Transaksi Benturan Kepentingan serta Transaksi Material dan Perubahan Kegiatan Usaha yang mengatur tentang transaksi yang mengandung benturan kepentingan dan tertib administrasi yang harus dilakukan; dan<br>• Bank mampu menghindari potensi terjadinya benturan kepentingan.<br>• The Bank has policies, systems, and procedures for resolving conflicts of interest in Decree No. SK.053/2020/PRESDIR-CorSec concerning Affiliated Transactions and Conflict of Interest Transactions as well as Material Transactions and Changes in Business Activities that regulate transactions containing conflicts of interest and administrative procedures that must be carried out; and<br>• The Bank is able to avoid potential conflicts of interest. |
| Penerapan Fungsi Kepatuhan Bank<br>Implementation of Bank Compliance Function | • Satuan Kerja Kepatuhan dalam menjalankan fungsinya bersifat Independen terhadap satuan kerja operasional;<br>• Satuan Kerja Kepatuhan telah mendukung pelaksanaan tugas dan tanggung jawab Direktur Kepatuhan sesuai dengan peraturan yang berlaku;<br>• Satuan Kerja Kepatuhan memberikan opini kepatuhan untuk memastikan bahwa kebijakan, ketentuan, sistem dan prosedur, serta kegiatan usaha Bank telah sesuai dengan ketentuan Otoritas Jasa Keuangan dan peraturan perundangan-undangan;<br>• Satuan Kerja Kepatuhan bersama Direktur yang membawahi kepatuhan serta seluruh pemangku kepentingan senantiasa menerapkan Budaya Kepatuhan yang lebih baik; dan<br>• Satuan Kerja Kepatuhan telah menyampaikan Laporan Pelaksanaan Tugas dan Tanggung Jawab Direktur yang membawahi kepatuhan sesuai dengan ketentuan regulator dan disampaikan secara tepat waktu.<br>• The Compliance Work Unit, in carrying out its functions, is independent of the operational work unit;<br>• The Compliance Work Unit has supported the implementation of the duties and responsibilities of the Compliance Director in accordance with applicable regulations;<br>• The Compliance Work Unit provides a compliance opinion to ensure that the Bank's policies, provisions, systems and procedures, and business activities are in accordance with the provisions of the Financial Services Authority and laws and regulations;<br>• The Compliance Work Unit, together with the Director in charge of compliance and all stakeholders, always implements a better Compliance Culture; and<br>• The Compliance Work Unit has submitted a Report on the Implementation of Duties and Responsibilities of the Director in charge of compliance in accordance with regulatory provisions and submitted it in a timely manner. |
| Penerapan Fungsi Audit Internal<br>Implementation of the Internal Audit Function | • Satuan Kerja Audit Internal (SKAI) secara struktur berada dibawah Direktur Utama dan independen terhadap satuan kerja operasional.<br>• Bank telah memiliki Piagam Audit Intern dengan SK.004/2024/PRESDIR-IAG tanggal 11 Januari 2024 dan Kebijakan Internal Audit dengan SK.015/2024/PRESDIR-IAG tanggal 26 Maret 2024.<br>• Fungsi Audit Intern Bank telah berjalan efektif pada seluruh aspek kegiatan sebagaimana diatur dalam Pedoman Kerja dan metodologi internal audit.<br>• SKAI melakukan pemantauan dan analisis terhadap tindak lanjut perbaikan yang dilakukan auditee.<br>• Satuan Kerja Audit Internal (SKAI) telah bertindak objektif dalam melakukan audit.<br>• Bank terus berupaya untuk meningkatkan sistem pengendalian intern agar dapat dijalankan secara efektif dan efisien, dan prosedur pengawasan dilaksanakan tanpa pengecualian.<br>• The Internal Audit Work Unit (SKAI) is structurally under the President Director and is independent of the operational work unit.<br>• The Bank has an Internal Audit Charter with SK.004/2024/PRESDIR-IAG dated January 11, 2024, and an Internal Audit Policy with SK.015/2024/PRESDIR-IAG dated March 26, 2024.<br>• The Bank's Internal Audit function has been running effectively in all aspects of activities as regulated in the Work Guidelines and internal audit methodology.<br>• SKAI monitors and analyzes the follow-up to improvements made by the auditee.<br>• The Internal Audit Work Unit (SKAI) has acted objectively in conducting audits.<br>• The Bank continues to strive to improve the internal control system, ensuring that it can be run effectively and efficiently, and supervisory procedures are implemented without exception. |

| | Analisis<br>Analysis |
|---|---|
| Penerapan Fungsi Audit Ekstern<br>Implementation of External Audit Function | • Penugasan Bank kepada akuntan publik (AP) dan kantor akuntan publik (KAP) telah memenuhi standar yang berlaku umum baik dari aspek kapasitas KAP, legalitas perjanjian kerja, ruang lingkup audit, dan standar profesional akuntan publik (SPAP) yang telah tertuang dalam perjanjian kerja tertulis;<br>• Bank telah menunjuk AP dan KAP yang telah terdaftar di Otoritas Jasa Keuangan;<br>• Pelaksanaan audit oleh AP dan KAP yang ditunjuk dilakukan secara independen dan memenuhi kriteria yang ditetapkan;<br>• AP telah melaksanakan audit secara independen dan profesional; dan<br>• Hasil audit dan management letter telah disampaikan kepada Otoritas Jasa Keuangan oleh KAP yang ditunjuk.<br>• The Bank's assignment to public accountants (AP) and public accounting firms (KAP) has met generally applicable standards in terms of KAP capacity, legality of work agreement, audit scope, and public accountant professional standards (SPAP) that have been stated in a written work agreement;<br>• The Bank has appointed AP and KAP that have been registered with the Financial Services Authority;<br>• The audit implementation by the appointed AP and KAP is carried out independently and meets the established criteria;<br>• AP has carried out the audit independently and professionally; and<br>• The audit results and management letter have been submitted to the Financial Services Authority by the appointed KAP. |
| Penerapan Fungsi Manajemen Risiko dan Pengendalian Internal<br>Implementation of Risk Management and Internal Control Functions | • Bank telah memiliki struktur organisasi yang memadai untuk mendukung penerapan manajemen risiko dan pengendalian intern;<br>• Dewan Komisaris telah mengevaluasi dan menyetujui kebijakan yang akan digunakan sebagai pedoman dalam penerapan manajemen risiko;<br>• Pelaksanaan review dan kaji ulang dilakukan secara berkala sesuai kebutuhan Bank terhadap penanganan kelemahan-kelemahan agar tidak terjadi pengaruh yang signifikan pada kondisi Bank;<br>• Bank telah melakukan pengembangan Budaya Manajemen Risiko, termasuk kesadaran risiko pada seluruh jenjang organisasi;<br>• Bank melakukan aktivitas bisnis yang sesuai dengan kemampuan permodalan untuk menyerap kemungkinan risiko kerugian.<br>• The Bank has an adequate organizational structure to support the implementation of risk management and internal control;<br>• The Board of Commissioners has evaluated and approved the policies that will be used as guidelines in the implementation of risk management;<br>• The implementation of reviews and re-examinations is carried out periodically according to the Bank's needs for handling weaknesses, ensuring that there is no significant impact on the Bank's condition;<br>• The Bank has developed a Risk Management Culture, including risk awareness at all levels of the organization;<br>• The Bank carries out business activities in accordance with its capital capacity to absorb possible risks of loss. |
| Penyediaan Dana Kepada Pihak Terkait (Related Party) dan Debitur Besar (Large Exposures)<br>Provision of Funds to Related Parties and Large Debtors (Large Exposures) | • Bank telah memiliki kebijakan, sistem, dan prosedur tertulis yang berkaitan dengan penyediaan dana kepada pihak terkait (related party) dan penyediaan dana besar (large exposure) sebagaimana tertuang pada Surat Keputusan No. SK.021/2023/DIR1-RMG tentang Kebijakan Perkreditan Bank;<br>• Bank telah memiliki Sistem Pelaporan dan Monitoring Penyediaan Dana dan BMPK sehingga semua informasi terintegrasi dan terotomatisasi dan tersimpan dalam satu database, sekaligus untuk automasi pelaporan penyediaan dana dan BMPK.<br>• Bank dalam mengambil keputusan terhadap penyediaan dana diputuskan oleh manajemen secara independen tanpa intervensi dari pihak terkait dan/atau pihak lainnya serta dilakukan berdasarkan kewenangan memutusnya; dan<br>• Bank telah menyampaikan Laporan Penyediaan Dana kepada Pihak Terkait dan/atau Penyediaan Dana Besar kepada Otoritas Jasa Keuangan secara tepat waktu.<br>• The Bank has written policies, systems, and procedures related to the provision of funds to related parties and the provision of large exposure as stated in Decree No. SK.021/2023/DIR1-RMG concerning Bank Credit Policy;<br>• The Bank has a Reporting and Monitoring System for the Provision of Funds and BMPK, ensuring that all information is integrated and automated and stored in one database, as well as for automation of reporting on the provision of funds and BMPK.<br>• The Bank in making decisions regarding the provision of funds, is decided by management independently without intervention from related parties and/or other parties and is carried out based on the authority to decide; and<br>• The Bank has submitted the Report on the Provision of Funds to Related Parties and/or Provision of Large Exposures to the Financial Services Authority in a timely manner. |
| Transparansi Kondisi Keuangan dan Non-Keuangan Bank, Laporan Pelaksanaan GCG dan Laporan Internal<br>Transparency of Bank Financial and Non-Financial Conditions, GCG Implementation Reports and Internal Reports | • Bank telah memiliki kebijakan dan prosedur mengenai tata cara pelaksanaan transparansi kondisi keuangan dan non-keuangan sebagaimana diatur pada Surat Keputusan No. SK.102/2021/PRESDIR-Corsec Tanggal 29 Oktober 2021 tentang Kebijakan Komunikasi dengan Pemegang Saham dan Investor Versi 1.0 PT. Bank Sinarmas Tbk.;<br>• Bank telah transparan dalam menyampaikan informasi keuangan Bank dan non-keuangan Bank kepada pemangku kepentingan, termasuk mengumumkan Laporan Keuangan Publikasi Triwulanan maupun Tahunan dan melaporkannya kepada Otoritas Jasa Keuangan atau pemangku kepentingan sesuai ketentuan yang berlaku;<br>• Bank telah memiliki tata cara pengaduan nasabah melalui website Bank, perjanjian dan/atau dokumen pemanfaatan produk dan/atau layanan, Call Center, atau disampaikan melalui petugas Bank yang telah diatur dalam SOP Penanganan Pengaduan Nasabah Bank Sinarmas Versi 5.0<br>• Cakupan Laporan Pelaksanaan Tata Kelola telah sesuai dengan ketentuan dan mencakup ketentuan yang berlaku; dan<br>• Bank Telah menyampaikan Laporan Pelaksanaan Tata Kelola kepada Otoritas Jasa Keuangan secara tepat waktu dan menyajikan Laporan Pelaksanaan Tata Kelola dalam situs web Bank.<br>• The Bank has policies and procedures regarding the procedures for implementing transparency of financial and non-financial conditions as stipulated in Decree No. SK.102/2021/PRESDIR-Corsec dated October 29, 2021, concerning Communication Policy with Shareholders and Investors Version 1.0 of PT. Bank Sinarmas Tbk.;<br>• The Bank has been transparent in conveying the Bank's financial and non-financial information to stakeholders, including announcing Quarterly and Annual Published Financial Statements and reporting them to the Financial Services Authority or stakeholders in accordance with applicable provisions;<br>• The Bank has procedures for customer complaints via the Bank's website, agreements and/or product and/or service utilization documents, Call Center, or submission through Bank officers as stipulated in the Bank Sinarmas Customer Complaint Handling SOP Version 5.0<br>• The scope of the Governance Implementation Report is in accordance with the provisions and includes applicable provisions; and<br>• The Bank has submitted the Governance Implementation Report to the Financial Services Authority in a timely manner and presented the Governance Implementation Report on the Bank's website. |

| Analisis<br>Analysis | |
|---|---|
| Rencana Strategis Bank<br>Bank Strategic Plan | • Bank telah menyusun Rencana Bisnis (Business Plan) sesuai dengan visi dan misi Bank.<br>• Rencana Bisnis Bank disusun secara realistis dengan memperhatikan faktor internal dan eksternal, prinsip kehati-hatian, serta pencapaian kinerja Bank sebelumnya.<br>• Penyusunan dan penyampaian Rencana Bisnis Bank telah berpedoman pada ketentuan Otoritas Jasa Keuangan.<br>• Rencana Bisnis Bank menggambarkan pertumbuhan Bank yang berkesinambungan.<br>• Bank telah menyampaikan Rencana Bisnis Bank kepada Otoritas Jasa Keuangan.<br>• Rencana Bisnis Bank telah dikomunikasikan kepada Pemegang Saham Pengendali dan ke seluruh jenjang organisasi yang ada pada Bank.<br>• The Bank has prepared a Business Plan in accordance with the Bank's vision and mission.<br>• The Bank's Business Plan is prepared realistically by considering internal and external factors, the principle of prudence, and the Bank's previous performance achievements.<br>• The preparation and submission of the Bank's Business Plan have been guided by the provisions of the Financial Services Authority.<br>• The Bank's Business Plan describes the Bank's sustainable growth.<br>• The Bank has submitted the Bank's Business Plan to the Financial Services Authority.<br>• The Bank's Business Plan has been communicated to the Controlling Shareholders and to all levels of the Bank's organization. |

Berdasarkan analisis terhadap seluruh kriteria/indikator penilaian tersebut, dapat disimpulkan bahwa Tata Kelola Bank dapat dilihat dari *Governance Structure, Governance Process,* dan *Governance Outcome*, sebagai berikut.

Based on the analysis of all the assessment criteria/ indicators, it can be concluded that Bank Governance can be seen from the Governance Structure, Governance Process, and Governance Outcome, as follows.

| *Governance Structure* | | |
|---|---|---|
| Secara umum pelaksanaan prinsip-prinsip Tata Kelola Bank Umum terkait *Governance Structure* telah dilakukan sesuai ketentuan yang berlaku.<br>In general, the implementation of the principles of Commercial Bank Governance related to Governance Structure has been carried out in accordance with applicable provisions. | **Faktor Positif:**<br>• Jumlah dan kriteria anggota Direksi dan Dewan Komisaris (Independen dan Non-Independen) Bank Sinarmas telah memenuhi prinsip-prinsip Tata Kelola Bank Umum sebagaimana tercantum pada ketentuan Tata Kelola yang berlaku;<br>• Penggantian dan/atau pengangkatan anggota Direksi telah memperhatikan rekomendasi dari Komite Remunerasi dan Nominasi;<br>• Seluruh anggota Direksi dan Dewan Komisaris memiliki integritas, kompetensi, dan reputasi keuangan yang memadai, dan telah lulus penilaian kemampuan dan kepatutan serta telah memperoleh surat persetujuan dari Otoritas Jasa Keuangan;<br>• Direktur Utama berasal dari pihak yang independen dari Pemegang Saham Pengendali. Anggota Direksi dan Dewan Komisaris memiliki kompetensi yang memadai dan relevan dengan jabatannya untuk menjalankan tugas dan tanggung jawab serta mampu mengimplementasikan kompetensi yang dimiliki dalam pelaksanaan tugas dan tanggung jawab; dan<br>• Seluruh anggota Direksi dan Dewan Komisaris memiliki kemauan dan kemampuan serta budaya pembelajaran secara berkelanjutan dalam rangka peningkatan pengetahuan tentang perbankan dan perkembangan terkini terkait bidang keuangan/ lainnya yang mendukung pelaksanaan tugasnya.<br>**Positive Factors:**<br>• The number and criteria of members of the Board of Directors and Board of Commissioners (Independent and Non-Independent) of Bank Sinarmas have met the principles of General Bank Governance as stated in the applicable Governance provisions;<br>• Replacement and/or appointment of members of the Board of Directors has taken into account the recommendations of the Remuneration and Nomination Committee;<br>• All members of the Board of Directors and Board of Commissioners have adequate integrity, competence, and financial reputation, and have passed the fit and proper assessment and have obtained a letter of approval from the Financial Services Authority;<br>• The President Director comes from a party independent of the Controlling Shareholder. Members of the Board of Directors and Board of Commissioners have adequate competence and are relevant to their positions to carry out their duties and responsibilities and are able to implement their competence in carrying out their duties and responsibilities; and<br>• All members of the Board of Directors and Board of Commissioners have the willingness and ability as well as a culture of continuous learning in order to increase knowledge about banking and the latest developments related to the financial/other fields that support the implementation of their duties. | **Faktor Negatif:**<br>Tidak terdapat kelemahan dalam pelaksanaan prinsip-prinsip Tata Kelola Bank Umum terkait *Governance Structure*.<br>**Negative Factors:**<br>There are no weaknesses in the implementation of the principles of General Bank Governance related to Governance Structure. |

| *Governance Process* | | |
|---|---|---|
| Secara umum Manajemen Bank telah menerapkan *Governance Process* dengan baik, tercermin dari pemenuhan yang memadai atas prinsip GCG.<br>In general, Bank Management has implemented the Governance Process well, as reflected in the adequate fulfillment of GCG principles. | **Faktor Positif:**<br>• Dewan Komisaris telah membentuk komite-komite yaitu Komite Audit, Komite Remunerasi dan Nominasi, dan Komite Pemantau Risiko. Direksi telah membentuk komite-komite, yaitu Komite Manajemen Risiko, Komite Kredit, Komite Penyelesaian Kredit Bermasalah, *Asset* & *Liability Committee Committee* (ALCO), Komite *Information Technology* (IT), dan Komite *Human Capital*, Komite Kebijakan Perkreditan;<br>• Seluruh Dewan Komisaris (Independen dan Non Independen) diganti dan/ atau diangkat dengan memperhatikan rekomendasi dari Komite Remunerasi dan Nominasi serta memperoleh persetujuan dalam RUPS;<br>• Pengangkatan anggota komite-komite dilakukan oleh direksi berdasarkan keputusan Rapat Dewan Komisaris;<br>• Direksi dan Dewan Komisaris telah menerapkan prinsip-prinsip GCG pada seluruh tingkatan/ jenjang organisasi. Dalam mengelola Bank, Direksi memiliki tanggung jawab dan kewenangan sebagaimana diatur dalam Anggaran Dasar dan peraturan perundang-undangan, termasuk tapi tidak terbatas pada:<br>- Menindaklanjuti temuan audit dan rekomendasi dari audit internal maupun eksternal;<br>- Menyediakan data dan informasi yang lengkap, akurat, terkini, dan tepat waktu kepada Dewan Komisaris.<br>- Menetapkan kebijakan dan keputusan strategis melalui mekanisme Rapat Direksi;<br>- Mengimplementasikan manajemen risiko dan melakukan penugasan audit eksternal (akuntan publik) yang memenuhi aspek-aspek yang dipersyaratkan oleh Otoritas Jasa Keuangan;<br>- Melakukan penilaian mandiri (*self-assessment*) secara berkala dan komprehensif terhadap kecukupan penerapan Tata Kelola sehingga Bank dapat segera menetapkan *action plan*, yang meliputi tindakan korektif yang diperlukan dalam hal masih terdapat kekurangan;<br>- Menyusun dan menetapkan kebijakan, prosedur manajemen risiko dan penetapan limit risiko yang memadai disesuaikan dengan tujuan, kebijakan, ukuran, dan kompleksitas usaha serta kemampuan Bank;<br>- Menyampaikan kepada Otoritas Jasa Keuangan laporan penyediaan dana kepada pihak terkait secara berkala dan tepat waktu;<br>• Pengambilan keputusan rapat Direksi dan Dewan Komisaris telah dilakukan berdasarkan musyawarah untuk mufakat, atau suara terbanyak apabila tidak terjadi musyawarah untuk mufakat. Setiap keputusan rapat yang diambil direksi dapat diimplementasikan, dan telah sesuai dengan kebijakan, pedoman, serta tata tertib kerja yang berlaku;<br>• Direksi dan dewan komisaris tidak mengambil dan/atau menerima keuntungan pribadi dari Bank selain remunerasi dan fasilitas lainnya yang ditetapkan RUPS, termasuk tidak ada anggota Direksi yang memanfaatkan Bank untuk kepentingan pribadi, keluarga, dan/atau pihak lain yang dapat merugikan atau mengurangi keuntungan bank;<br>• Pelaksanaan tugas dan tanggung jawab Direksi dan Dewan Komisaris (Independen dan Non-Independen) telah dilakukan secara independen sesuai ketentuan yang berlaku dengan didukung oleh Satuan Kerja Kepatuhan, *Risk Management Group*, dan Satuan Kerja Audit Internal;<br>• Dalam mengelola Bank, Dewan Komisaris telah melaksanakan tugas untuk memastikan terselenggaranya prinsip GCG dalam setiap kegiatan usaha Bank pada seluruh tingkatan atau jenjang organisasi termasuk dan tidak terbatas pada:<br>- Melaksanakan pengawasan secara berkala maupun sewaktu-waktu terhadap pelaksanaan tugas dan tanggung jawab Direksi serta memberi nasihat kepada Direksi;<br>- Memberikan pengarahan, memantau, dan mengevaluasi pelaksanaan kebijakan strategis Bank; dan<br>• Kemampuan permodalan Bank sangat kuat untuk menutup kerugian dan/atau risiko yang mungkin timbul dari aktivitas usaha yang dijalankan oleh Bank. | **Faktor Negatif:**<br>Tidak terdapat kelemahan dalam pelaksanaan prinsip-prinsip Tata Kelola Bank Umum terkait *Governance* Proses.<br><br>**Negative Factors:**<br>There are no weaknesses in the implementation of the principles of Commercial Bank Governance related to the Governance Process. |

**Positive Factors:**

- The Board of Commissioners has formed committees, namely the Audit Committee, the Remuneration and Nomination Committee, and the Risk Monitoring Committee. The Board of Directors has formed committees, namely the Risk Management Committee, the Credit Committee, the Non-Non-Performing Loan Resolution Committee, the Asset & Liability Committee (ALCO), the Information Technology (IT) Committee, the Human Capital Committee, and the Credit Policy Committee;
- All members of the Board of Commissioners (Independent and Non-Independent) are replaced and/or appointed by considering the recommendations of the Remuneration and Nomination Committee and obtaining approval in the GMS;
- Appointment of members of the committees is carried out by the Board of Directors based on the decision of the Board of Commissioners Meeting;
- The Board of Directors and the Board of Commissioners have implemented GCG principles at all levels of the organization. In managing the Bank, the Board of Directors has the responsibilities and authorities as stipulated in the Articles of Association and laws and regulations, including but not limited to:
  - Following up on audit findings and recommendations from internal and external audits;
  - Providing complete, accurate, current, and timely data and information to the Board of Commissioners.
  - Establishing strategic policies and decisions through the Board of Directors Meeting mechanism;
  - Implementing risk management and carrying out external audit assignments (public accountants) that meet the aspects required by the Financial Services Authority;
  - Conducting periodic and comprehensive self-assessments on the adequacy of the implementation of Governance, ensuring that the Bank can immediately determine an action plan, which includes corrective actions needed if there are still deficiencies;
  - Preparing and establishing policies and risk management procedures and setting adequate risk limits adjusted to the objectives, policies, size, and complexity of the Bank›s business and capabilities;
  - Submitting to the Financial Services Authority reports on the provision of funds to related parties periodically and on time;
- Decision-making at the Board of Directors and Board of Commissioners meetings has been carried out based on deliberation to reach consensus or by majority vote if there is no deliberation to reach consensus. Every decision of the meeting taken by the board of directors can be implemented and has been in accordance with the applicable policies, guidelines, and work procedures;
- The board of directors and board of commissioners do not take and/or receive personal benefits from the Bank other than remuneration and other facilities determined by the GMS, including no member of the Board of Directors who uses the Bank for personal, family, and/or other party interests that can harm or reduce the Bank›s profits;
- The implementation of the duties and responsibilities of the Board of Directors and Board of Commissioners (Independent and Non-Independent) has been carried out independently in accordance with applicable provisions supported by the Compliance Work Unit, Risk Management Group, and Internal Audit Work Unit;
- In managing the Bank, the Board of Commissioners has carried out duties to ensure the implementation of GCG principles in every business activity of the Bank at all levels of the organization, including but not limited to:
- Carrying out periodic or intermittent supervision of the implementation of the duties and responsibilities of the Board of Directors and providing advice to the Board of Directors;
- Providing direction, monitoring, and evaluating the implementation of the Bank›s strategic policies; and
- The Bank›s capital capacity is very strong to cover losses and/or risks that may arise from business activities carried out by the Bank.

| *Governance Outcome* | | |
|---|---|---|
| Secara umum Manajemen Bank telah menerapkan *Governance Outcome* dengan baik, tercermin dari pemenuhan yang memadai atas prinsip Tata Kelola yang baik.<br>In general, Bank Management has implemented Governance Outcomes well, as reflected in the adequate fulfillment of Good Governance principles. | **Faktor Positif:**<br>• Manajemen Bank (Direksi, Komisaris, dan Komite-Komite) telah melakukan penerapan Tata Kelola yang secara umum baik, tercermin dari pemenuhan yang memadai atas prinsip GCG;<br>• Direksi telah mengkomunikasikan kepada pegawai mengenai arah bisnis Bank dalam rangka pencapaian Misi dan Visi bank;<br>• Pertanggungjawaban pelaksanaan tugas Direksi, pelaksanaan Rapat Direksi dan Dewan Komisaris serta Komite-Komite telah dilakukan sesuai dengan prinsip-prinsip GCG. Hasil rapat Direksi dan Dewan Komisaris masing-masing telah dituangkan dalam risalah rapat dan didokumentasikan dengan baik termasuk pengungkapan secara jelas perbedaan pendapat atau *dissenting opinion*;<br>• Dalam laporan pelaksanaan Tata Kelola, seluruh anggota Direksi dan Dewan Komisaris paling sedikit telah mengungkapkan:<br>- Kepemilikan saham yang mencapai 5% atau lebih pada Bank yang bersangkutan maupun pada Bank dan perusahaan lain yang berkedudukan di dalam dan di luar negeri;<br>- Hubungan keuangan dan hubungan keluarga dengan anggota Direksi lain, anggota Dewan Komisaris, dan/atau Pemegang Saham Pengendali Bank;<br>- Remunerasi dan fasilitas lain;<br>- Opsi saham yang dimiliki Direksi atau Dewan komisaris;<br>• Bank telah menyampaikan laporan-laporan kepada regulator dan pemegang saham secara berkala dan tepat waktu sesuai dengan ketentuan yang berlaku;<br>• Pelaksanaan Fungsi Kepatuhan Bank telah dilakukan dengan baik dan memadai serta sesuai dengan ketentuan yang berlaku;<br>• Fungsi Audit Internal telah dilaksanakan secara memadai dengan memperhatikan antara lain independensi dan objektivitas dan terpenuhinya jumlah dan kualitas auditor internal.<br>• KAP yang ditunjuk oleh Bank telah menyampaikan hasil audit yang menggambarkan permasalahan signifikan yang dihadapi oleh Bank secara tepat waktu kepada Otoritas Jasa Keuangan;<br>• Bank telah menerapkan manajemen risiko secara efektif yang disesuaikan dengan tujuan kebijakan, ukuran, dan kompleksitas usaha serta kemampuan Bank;<br>• Pemberian penyediaan dana oleh bank kepada pihak terkait (*related party*) dan/atau penyediaan dana besar (*large exposure*) telah memenuhi ketentuan yang berlaku dan memperhatikan kemampuan permodalan dan penyebaran atau diversifikasi portofolio penyediaan dana; dan<br>• Kinerja Bank mengalami peningkatan pada tahun 2024 dibandingkan periode yang sama tahun sebelumnya yang tercermin dari adanya peningkatan laba usaha.<br><br>**Positive Factors:**<br>• Bank Management (Board of Directors, Board of Commissioners, and Committees) has implemented generally good Governance, reflected by adequate fulfillment of GCG principles;<br>• The Board of Directors has communicated to employees regarding the Bank›s business direction in order to achieve the Bank›s Mission and Vision;<br>• Accountability for the implementation of the Board of Directors› duties and the implementation of Board of Directors and Board of Commissioners Meetings and Committees has been carried out in accordance with GCG principles. The results of the Board of Directors and Board of Commissioners meetings have each been stated in the minutes of the meeting and are well documented, including clear disclosure of differences of opinion or dissenting opinions;<br>• In the report on the implementation of Governance, all members of the Board of Directors and Board of Commissioners have at least disclosed:<br>- Share ownership of 5% or more in the Bank concerned or in other Banks and companies domiciled domestically and abroad;<br>- Financial and familial relationships with other members of the Board of Directors, members of the Board of Commissioners, and/or Controlling Shareholders of the Bank;<br>- Remuneration and other facilities;<br>- Stock options held by the Board of Directors or Board of Commissioners;<br>• The Bank has submitted reports to regulators and shareholders periodically and on time in accordance with applicable provisions;<br>• The implementation of the Bank›s Compliance Function has been carried out properly and adequately and in accordance with applicable provisions;<br>• The Internal Audit Function has been carried out adequately by considering, among other things, independence and objectivity and the fulfillment of the number and quality of internal auditors.<br>• The KAP appointed by the Bank has submitted audit results that describe significant problems faced by the Bank in a timely manner to the Financial Services Authority;<br>• The Bank has implemented effective risk management that is adjusted to the objectives of the policy, size, and complexity of the business and the Bank›s capabilities;<br>• The provision of funds by the Bank to related parties and/or large exposure has complied with applicable provisions and has taken into account capital capabilities and the distribution or diversification of the fund provision portfolio; and<br>• The Bank›s performance has increased in 2024 compared to the same period the previous year, as reflected in the increase in operating profit. | **Faktor Negatif:**<br>Tidak terdapat kelemahan dalam pelaksanaan prinsip-prinsip Tata Kelola Bank Umum terkait *Governance Outcome*.<br><br>**Negative Factors:**<br>There are no weaknesses in the implementation of the principles of General Bank Governance related to Governance Outcome. |

## Rekomendasi Hasil Penilaian

Berdasarkan SEOJK No.13/SEOJK.03/2017 Tentang Penerapan Tata Kelola Bagi Bank Umum maka hasil penilaian tata kelola yang dilakukan secara mandiri (self-assessment) oleh PT. Bank Sinarmas Tbk. untuk periode pelaporan self-assessment semester II tahun 2024 dapat disimpulkan bahwa penerapan tata kelola yang baik (GCG) PT. Bank Sinarmas Tbk. berada pada peringkat 2 (dua) yaitu bahwa Manajemen PT. Bank Sinarmas Tbk. telah menerapkan prinsip-prinsip GCG dengan baik. Dalam hal terdapat kelemahan yang terjadi atas penerapan prinsip GCG dapat diselesaikan dengan baik oleh Manajemen PT. Bank Sinarmas Tbk.

## Assessment Result Recommendations

Based on SEOJK No.13/SEOJK.03/2017 Concerning the Implementation of Governance for Commercial Banks, the results of the governance assessment conducted independently (self-assessment) by PT. Bank Sinarmas Tbk. for the reporting period of the second semester of 2024, it can be concluded that the implementation of good governance (GCG) of PT. Bank Sinarmas Tbk. rating is 2 (two), namely that the Management of PT. Bank Sinarmas Tbk. has implemented the principles of GCG well. In the event that there are weaknesses that occur in the implementation of the principles of GCG, they can be resolved properly by the Management of PT. Bank Sinarmas Tbk.

## Penerapan Tata Kelola Berdasarkan Pedoman Umum Governansi Korporat Indonesia (PUGKI)

Bank Sinarmas juga telah menerapkan kebijakan tata kelola yang mengacu pada PUGKI 2021, seperti ditetapkan oleh Komite Nasional Kebijakan Governansi (KNKG). Uraiannya disampaikan melalui tabel di bawah ini.

## Implementation of Governance Based on the General Guidelines for Indonesian Corporate Governance (PUGKI)

Bank Sinarmas has also implemented a governance policy that refers to PUGKI 2021, as stipulated by the National Committee for Governance Policy (KNKG). The description is presented in the table below.

| Rekomendasi<br>Recommendation | | Penerapan<br>Implementation |
|---|---|---|
| **Prinsip 1: Peran dan Tanggung Jawab Direksi dan Dewan Komisaris**<br>Principle 1: Roles and Responsibilities of the Board of Directors and the Board of Commissioners | | |
| **1.1 Peran dan Tanggung Jawab Direksi**<br>1.1 Role and Responsibilities of the Board of Directors | 1.1.1 Untuk mencapai penciptaan nilai yang berkelanjutan, Direksi menjalankan peran kepemimpinannya dan berupaya mencapai hasil governansi sebagai berikut:<br>a. berdaya saing dan berfokus ke kinerja jangka panjang;<br>b. beretika dan bertanggung jawab dalam menjalankan bisnis;<br>c. berkontribusi positif terhadap masyarakat dan lingkungan; serta<br>d. berkemampuan dalam bertahan dan bertumbuh (*corporate resilience*)<br>1.1.1 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.<br>1.1.2 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.<br>1.1.3 Direksi memastikan integritas akuntansi dan sistem pelaporan keuangan korporasi dan pengungkapan yang tepat waktu dan akurat atas semua informasi material mengenai korporasi.<br>1.1.4 Direksi memastikan pelaporan keberlanjutan telah disusun sebagaimana mestinya.<br>1.1.5 Direksi membangun kerangka kerja untuk governansi teknologi informasi (TI) korporasi yang selaras dengan kebutuhan dan prioritas bisnis korporasi, mendorong peluang dan kinerja bisnis, memperkuat manajemen risiko, serta mendukung tujuan dan strategi korporasi.<br>1.1.6 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.<br>1.1.7 Piagam Direksi secara periodik ditinjau. Piagam mencakup antara lain pembagian peran Direktur secara individual dapat diatur di Piagam Direksi atau dengan surat keputusan Direksi.<br>1.1.8 Direksi mempunyai kebijakan terkait pengunduran diri anggota Direksi apabila terlibat dalam kejahatan keuangan dan terbukti melakukan kesalahan. | **Diterapkan**<br>**Direksi telah menetapkan strategi dan target Bank baik dalam jangka pendek (rencana bisnis Bank) sampai dengan jangka panjang (corporate plan).**<br><br>**Dalam menjalankan kegiatan bisnisnya, Bank memiliki Kode Etik yang wajib dipenuhi dan dijalankan oleh seluruh lini Bank. Hal tersebut terus disosialisasikan bersama nilai-nilai perusahaan untuk memelihara budaya kerja yang berintegritas.**<br><br>**Di tengah persaingan bisnis global, Bank telah membuktikan kemampuan bertahan dan bertumbuh, hal tersebut dapat di lihat pada Laporan Keuangan yang dipaparkan pada RUPST (Rapat Umum Pemegang Saham Tahunan).**<br><br>**Bank juga telah menjalankan kewajibannya dalam memberikan kontribusi positif kepada masyarakat melalui program-program CSR setiap tahunnya.**<br><br>**Direksi selalu memastikan bahwa visi misi Bank konsisten selaras dengan strategi dan tujuan jangka panjang Bank. Bank melakukan optimalisasi penerapan teknologi informasi sebagai salah satu pilar strategi dalam mewujudkan target bisnis baik jangka pendek maupun jangka panjang.**<br><br>**Bank memiliki system manajemen risiko dan system pengendalian internal dalam menjalankan kegiatan usaha Bank selaras dengan visi, misi, tujuan, sasaran dan strategi Bank serta mematuhi peraturan perundang-undangan yang berlaku.**<br><br>**Direksi telah memastikan integritas pada setiap lini yang bertugas dalam pengungkapan informasi perusahaan memiliki kemampuan dan latar belakang yang mumpuni pada bidangnya. Direksi juga bertanggung jawab atas publikasi Laporan Keuangan serta Laporan Tahunan pada situs web Bank dan media massa sesuai peraturan yang berlaku.**<br><br>**Direksi beserta jajaran manajemen telah memastikan Laporan Keberlanjutan disusun berdasarkan kerangka pelaporan sesuai dengan ketentuan perundang-undangan yang berlaku.**<br><br>**Bank telah memiliki strategi dan kerangka kerja governansi Teknologi Informasi (TI) yang dijelaskan pada Laporan Tahunan ini. Direksi memastikan bahwa Bank memiliki kebijakan alokasi sumber daya TI yang memadai dan optimal untuk mendukung tujuan dan strategi Bank.**<br><br>**Ketentuan terkait Direksi seperti Piagam, Tugas dan Tanggung Jawab serta kebijakan pengunduran diri anggota Direksi telah diatur dan di reviu secara berkala. Hal-hal tersebut telah dijelaskan pada Laporan Tahunan ini.** |

| Rekomendasi<br>Recommendation | Penerapan<br>Implementation |
|---|---|
| | Apply<br><br>The Board of Directors has set the Bank›s strategy and targets both in the short term (Bank›s business plan) and the long term (corporate plan).<br><br>In runing its business, the Bank has a Code of Ethics that must be fulfilled and implemented by all lines of the Bank. This continues to be socialized together with the company›s values to maintain a work culture with integrity.<br><br>In the midst of global business competition, the Bank has proven its ability to survive and grow as can be seen in the Financial Report presented at the AGMS (Annual General Meeting of Shareholders).<br><br>The Bank has also met obligations in providing positive contributions to the community through CSR programs every year.<br><br>The Board of Directors always ensures that the Bank›s vision and mission are consistent with the Bank›s long-term strategy and goals. The Bank optimizes the application of information technology as one of the pillars of strategy in realizing business targets both in the short and long terms.<br><br>The Bank has a risk management system and internal control system in carrying out the Bank›s business activities in line with the Bank›s vision, mission, goals, targets and strategies and complies with applicable laws and regulations.<br><br>The Board of Directors has ensured the integrity of each line tasked with disclosing company information and has the ability and background that are qualified in their fields. The Board of Directors is also responsible for the publication of the Financial Report and Annual Report on the Bank›s website and mass media in accordance with applicable regulations.<br><br>The Board of Directors and management have ensured that the Sustainability Report is prepared based on a reporting framework in compiance with applicable laws and regulations.<br><br>The Bank has an Information Technology (IT) governance strategy and framework explained in this Annual Report. The Board of Directors ensures that the Bank has an adequate and optimal IT resource allocation policy to support the Bank›s goals and strategies.<br><br>Provisions related to the Board of Directors such as the Charter, Duties and Responsibilities and the resignation policy of members of the Board of Directors have been regulated and reviewed periodically. These matters have been explained in this Annual Report. |

| | | Rekomendasi<br>Recommendation | Penerapan<br>Implementation |
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| | | 1.1.1 To achieve sustainable value creation, the Board of Directors carries out its leadership role and strives to achieve the following governance outcomes:<br>a. competitive and focused on long-term performance;<br>b. ethical and responsible for conducting business;<br>c. contributing positively to society and the environment; and<br>d. capable of surviving and growing (corporate resilience)<br>1.1.2 The Board of Directors must ensure that the corporation›s mission, vision, goals, objectives, strategies, and annual and medium-term plans are consistent with long-term goals by utilizing innovation and technology effectively.<br>1.1.3 The Board of Directors ensures that the corporation implements appropriate and effective risk management and internal control systems that are aligned with the corporation›s vision, mission, goals, objectives, and strategies and comply with applicable laws and regulations and standards.<br>1.1.4 The Board of Directors ensures the integrity of the corporation›s accounting and financial reporting systems and timely and accurate disclosure of all material information regarding the corporation.<br>1.1.5 The Board of Directors ensures that sustainability reporting has been prepared properly.<br>1.1.6 The Board of Directors builds a framework for corporate information technology (IT) governance that is aligned with the needs and priorities of the corporation›s business, drives business opportunities and performance, strengthens risk management, and supports corporate goals and strategies.<br>1.1.7 For corporations that carry out business activities based on Sharia principles, the Board of Directors needs to ensure the authority and availability of adequate supporting devices, ensuring that the Sharia Supervisory Board can carry out its role effectively.<br>1.1.8 The Board of Directors Charter is reviewed periodically. The Charter includes, among other things, the division of roles of individual Directors, which can be regulated in the Board of Directors Charter or by a Board of Directors Decree.<br>1.1.9 The Board of Directors has a policy regarding the resignation of members of the Board of Directors if they are involved in financial crimes and are proven to have committed mistake. | |
| **1.2**<br>1.2 | **Penilaian Kinerja - Direksi dan Anggotanya**<br>**Performance Assessment - Board of Directors and its Members** | 1.1.1 Dewan Komisaris melakukan evaluasi formal tahunan secara obyektif dan independen untuk menentukan efektivitas Direksi dan setiap individu Direktur.<br>1.1.2 Dewan Komisaris dengan pertimbangan Komite Nominasi dan Remunerasi, bertanggung jawab menentukan kriteria evaluasi kinerja dan menilai kinerja Direktur Utama dan anggota Direksi lainnya.<br>1.1.1 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.<br>1.1.2 The Board of Commissioners, with consideration from the Nomination and Remuneration Committee, is responsible for determining the performance evaluation criteria and assessing the performance of the President Director and other members of the Board of Directors. | **Diterapkan**<br>Bank telah memiliki kebijakan penilaian terhadap kinerja Direksi yang terdiri dari penilaian kinerja kolegial Direksi.<br><br>Hasil penilaian ditinjau oleh Komite Remunerasi dan Nominasi untuk mendapatkan masukan dan rekomendasi sebelum dimintakan persetujuan Dewan Komisaris.<br><br>Penjelasan lebih lanjut telah disampaikan pada pembahasan Penilaian Kinerja Dewan Komisaris dan Direksi dalam Laporan Tahunan ini.<br><br>**Apply**<br>The Bank has a policy for assessing the performance of the Board of Directors consisting of a collegial performance assessment of the Board of Directors.<br><br>The results of the assessment are reviewed by the Remuneration and Nomination Committee to get input and recommendations and submitted to the Board of Commissioners for approval.<br><br>Further explanation is available in the discussion of the Performance Assessment of the Board of Commissioners and Board of Directors in this Annual Report. |

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| **1.3** | **Peran dan Tanggung Jawab Dewan Komisaris**<br>1.3 Role and Responsibilities of the Board of Commissioners | 1.1.1 Dewan Komisaris mereviu strategi korporasi paling tidak setiap tahun dan menyetujui misi, visi dan strategi korporasi yang dirumuskan oleh Direksi. Dewan Komisaris juga mereviu, memberikan saran dan menyetujui rencana bisnis dan rencana keuangan jangka panjang dan rencana keuangan jangka pendek korporasi. Dewan Komisaris memberikan advis dan melakukan pemantauan kepada Direksi atas pengelolaan implementasinya. Direksi dan Dewan Komisaris terlibat dalam keputusan yang sangat penting bagi korporasi, diatur dalam anggaran dasar korporasi.<br>1.1.2 Jenis keputusan yang memerlukan persetujuan Dewan Komisaris harus diungkapkan dalam laporan tahunan.<br>1.1.3 Dengan memperhatikan rekomendasi Komite Nominasi dan Remunerasi, Dewan Komisaris mengusulkan kepada, dan untuk diputuskan oleh, RUPS pengangkatan dan/atau pemberhentian anggota Direksi dan anggota Dewan Komisaris. Dalam mengusulkan hal di atas, Dewan Komisaris memperhatikan keberagaman, unsur nondiskriminatif dan memberikan kesempatan yang sama tanpa membedakan suku, agama, ras, antar golongan dan jender. Dewan Komisaris memastikan proses pencalonan dan pemilihan anggota Direksi dan anggota Dewan Komisaris adalah formal dan transparan.<br>1.1.4 Dewan Komisaris atau Komite yang menjalankan fungsi nominasi menyusun kebijakan suksesi dalam proses nominasi anggota Direksi. Setiap tahun Dewan Komisaris meninjau pelaporan pelaksanaan rencana pengembangan dan suksesi yang disampaikan Direktur Utama.<br>1.1.5 Dewan Komisaris a). 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; b). secara berkala mereviu sistem remunerasi Direksi dan Dewan Komisaris.<br>1.1.6 Dewan Komisaris mengawasi efektivitas kebijakan governansi korporat dan implementasinya serta mengusulkan perubahan jika diperlukan.<br>1.1.7 Dewan Komisaris memantau dan mengarahkan agar korporasi menerapkan manajemen risiko dan sistem pengendalian internal yang tepat dan efektif yang selaras dengan tujuan, sasaran, dan strategi korporasi serta mematuhi peraturan perundang-undangan, kode perilaku dan standar yang berlaku.<br>1.1.8 Dewan Komisaris mengawasi dan mengarahkan agar tercapai integritas akuntansi dan sistem pelaporan keuangan korporat, serta independensi fungsi audit internal dan eksternal.<br>1.1.9 Dewan Komisaris memantau, mereviu dan menyetujui laporan tahunan dan laporan keberlanjutan Korporasi serta memastikan integritasnya, serta mengawasi proses pengungkapan dan pengkomunikasian korporasi.<br>1.1.10 Piagam Dewan Komisaris secara periodik ditinjau.<br>1.1.11 Dewan Komisaris mempunyai kebijakan terkait pengunduran diri anggota Dewan Komisaris apabila terlibat dalam kejahatan keuangan dan terbukti melakukan kesalahan.<br>1.1.12 Komisaris independen sangat diharapkan untuk dapat berkontribusi dalam diskusi yang jujur, obyektif, aktif dan konstruktif pada rapat Dewan Komisaris.<br>1.1.13 Komisaris Utama berperan sebagai koordinator Dewan Komisaris dan memastikan efektivitasnya. Komisaris Utama mendorong budaya keterbukaan dan dialog konstruktif yang memungkinkan berbagai pandangan diungkapkan, termasuk mengkoordinasi 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.<br>1.1.1 The Board of Commissioners reviews the corporate strategy at least annually and approves the mission, vision, and corporate strategy formulated by the Board of Directors. The Board of Commissioners also reviews, provides advice, and approves the business plan and long-term financial plan and short-term financial plan of the corporation. The Board of Commissioners provides advice and monitors the management of its implementation to the Board of Directors. The Board of Directors and the Board of Commissioners are involved in decisions that are very important to the corporation, as regulated in the articles of association of the corporation. | **Diterapkan**<br>Dewan Komisaris bersama Direksi melakukan reviu mengenai kesesuaian visi dan misi perusahaan terhadap strategi, kondisi Bank saat ini dan tantangan usaha yang akan dihadapi.<br><br>Dewan Komisaris juga mereviu, memberikan saran dan menyetujui rencana bisnis dan rencana keuangan jangka panjang dan jangka pendek serta melakukan pemantauan atas implementasinya.<br><br>Keputusan Direksi yang memerlukan persetujuan Dewan Komisaris telah diungkapkan pada Laporan Tahunan ini.<br><br>Dewan Komisaris mengusulkan kepada, dan untuk diputuskan oleh, RUPS dengan memperhatikan rekomendasi Komite Remunerasi dan Nominasi terkait pengangkatan dan/atau pemberhentian anggota Direksi dan anggota Dewan Komisaris. Proses tersebut telah di jelaskan secara rinci dalam Laporan Tahunan ini.<br><br>Bank memiliki dan menjalankan kebijakan suksesi Direksi dan/atau Manajemen Senior yang merupakan kebijakan yang terkait dengan Komite Remunerasi dan Nominasi sebagaimana yang tertuang dalam Laporan Tahunan ini.<br><br>Komite Remunerasi dan Nominasi mempertimbangkan informasi atas kisaran dan standar remunerasi dengan industri sejenis serta kemampuan Bank, Komite Remunerasi dan Nominasi memberikan rekomendasi untuk selanjutnya dibahas dalam Rapat Dewan Komisaris, Dewan Komisaris mengusulkan remunerasi tersebut kepada RUPS; dan RUPS menetapkan remunerasi untuk Dewan Komisaris, untuk kemudian diimplementasikan.<br><br>Dewan Komisaris dan/atau bersama Komite Dibawah Dewan Komisaris melakukan pengawasan dan memberikan arahan terkait kebijakan dan efektivitas penerapan tata kelola, manajemen risiko dan sistem pengedalian internal yang dilakukan oleh manajemen, serta memberikan masukan dan perbaikan jika diperlukan.<br><br>Dewan Komisaris juga melakukan pengawasan terhadap integritas akuntansi dan system pelaporan keuangan serta independensi fungsi audit internal dan eksternal.<br><br>Dewan Komisaris melakukan pengawasan terhadap penyusunan Laporan Tahunan dan Laporan Keberlanjutan untuk kemudian diberikan persetujuan. Dewan Komisaris juga mengawasi proses pengungkapan dan pengkomunikasian Bank.<br><br>Piagam Dewan Komisaris dikaji secara berkala dan diunggah ke situs web Bank.<br><br>Dewan Komisaris terikat pada kebijakan terkait pengunduran diri apabila terlibat dalam kejahatan keuangan dan/atau tindak pidana lainnya.<br><br>Komisaris Indpenden telah memenuhi kriteria dan membuat pernyataan independensi sesuai dengan ketentuan yang berlaku. Komisaris Independen Bank memiliki rekam jejak yang kredibel. Hal ini ditunjukan dengan persentase kehadiran di rapat Dewan Komisaris dan Komite yang rata-rata 100%.<br><br>Komisaris Utama memiliki tugas dan tanggung jawab untuk mengkoordinasikan pelaksanaan tugas dan tanggung jawab anggota Dewan Komisaris lainnya. Komisaris Utama juga memimpin rapat gabungan Dewan Komisaris dan Direksi yang dilaksanakan secara berkala. |

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| 1.1.2 The types of decisions that require the approval of the Board of Commissioners must be disclosed in the annual report.<br>1.1.3 By considering the recommendations of the Nomination and Remuneration Committee, the Board of Commissioners proposes to, and to be decided 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 diversity and non-discriminatory elements and provides equal opportunities without distinguishing between ethnicity, religion, race, inter-group, and gender. The Board of Commissioners ensures that the nomination and election process for members of the Board of Directors and members of the Board of Commissioners is formal and transparent.<br>1.1.4 The Board of Commissioners or the Committee that carries out the nomination function prepares a succession policy in the nomination process for members of the Board of Directors. Every year the Board of Commissioners reviews the reporting on the implementation of the development and succession plan submitted by the President Director.<br>1.1.5 Board of Commissioners a). submits to the GMS, which may be preceded by a proposal from the Committee that carries out the remuneration function, the amount of remuneration for members of the Board of Directors and members of the Board of Commissioners that is in line with sustainable corporate development and the long-term interests of the corporation and shareholders; b). periodically reviews the remuneration system for the Board of Directors and Board of Commissioners.<br>1.1.6 The Board of Commissioners oversees the effectiveness of corporate governance policies and their implementation and proposes changes if necessary.<br>1.1.7 The Board of Commissioners monitors and directs that the corporation implement appropriate and effective risk management and internal control systems that are in line with the objectives, targets, and strategies of the corporation and comply with applicable laws and regulations, codes of conduct, and standards.<br>1.1.8 The Board of Commissioners oversees and directs that the integrity of the corporate accounting and financial reporting system is achieved, as well as the independence of the internal and external audit functions.<br>1.1.9 The Board of Commissioners monitors, reviews, and approves the Corporation's annual report and sustainability report and ensures its integrity and oversees the corporate disclosure and communication process.<br>1.1.10 The Board of Commissioners Charter is periodically reviewed.<br>1.1.11 The Board of Commissioners has a policy regarding the resignation of members of the Board of Commissioners if they are involved in financial crimes and are proven to have committed mistakes.<br>1.1.12 Independent Commissioners are highly expected to contribute to honest, objective, active, and constructive discussions at Board of Commissioners meetings.<br>1.1.13 The President Commissioner acts as the coordinator of the Board of Commissioners and ensures its effectiveness. The President Commissioner encourages a culture of transparency and constructive dialogue that allows a variety of views to be expressed, including coordinating the setting of appropriate board meeting agendas and ensuring sufficient time is available to discuss all agendas. In addition, there must also be opportunities for the Board of Commissioners to meet with the Board of Directors and senior management. | **Apply**<br>The Board of Commissioners and the Board of Directors makes a review of the suitability of the company›s vision and mission to the strategy, current condition of the Bank and the business challenges encountered.<br><br>The Board of Commissioners also reviews, provides advice and approves the long-term and short-term business and financial plans and monitors their implementation.<br><br>Decisions of the Board of Directors that require the approval of the Board of Commissioners have been disclosed in this Annual Report.<br><br>The Board of Commissioners proposes to, and to be decided by, the GMS by considering the recommendations of the Remuneration and Nomination Committee regarding the appointment and/or dismissal of members of the Board of Directors and members of the Board of Commissioners. The process has been explained in detail in this Annual Report.<br><br>The Bank has and implements a policy of succession of the Board of Directors and/or Senior Management which is a policy related to the Remuneration and Nomination Committee as stated in this Annual Report.<br><br>The Remuneration and Nomination Committee considers information on the range and standard of remuneration with similar industries and the Bank›s capabilities, the Remuneration and Nomination Committee provides recommendations to be further discussed in the Board of Commissioners Meeting, the Board of Commissioners proposes the remuneration to the GMS; and the GMS determines the remuneration for the Board of Commissioners, to be implemented later.<br><br>The Board of Commissioners and/or together with the Committees under the Board of Commissioners supervise and provide direction regarding policies and the effectiveness of the implementation of governance, risk management and internal control systems carried out by management, and provide input and improvements if necessary.<br><br>The Board of Commissioners also supervises the integrity of accounting and financial reporting systems and the independence of internal and external audit functions.<br><br>The Board of Commissioners supervises the preparation of the Annual Report and Sustainability Report for approval. The Board of Commissioners also supervises the Bank›s disclosure and communication processes.<br><br>The Board of Commissioners Charter is reviewed periodically and uploaded to the Bank›s website.<br><br>The Board of Commissioners is bound by a policy regarding resignation if involved in financial crimes and/or other criminal acts.<br><br>Independent Commissioners have met the criteria and made a statement of independence in accordance with applicable provisions. The Bank›s Independent Commissioners have a credible track record. This is indicated by the percentage of attendance at Board of Commissioners and Committee meetings which averages 100%.<br><br>The President Commissioner has the duty and responsibility to coordinate the implementation of the duties and responsibilities of other members of the Board of Commissioners. The President Commissioner also leads joint meetings of the Board of Commissioners and the Board of Directors which are held periodically. |

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| **1.4** | **Pembentukan Komite**<br>1.4 Formation of the Committee | 1.1.1 Korporasi memiliki komite-komite di bawah Dewan Komisaris sekurang-kurangnya terdiri dari: Komite Audit, Komite Nominasi dan Remunerasi dan Komite Pemantau Manajemen Risiko.<br>1.1.2 Dewan Komisaris memastikan bahwa anggota Komite Audit seluruhnya independen dan komite lain yang dibentuk Dewan Komisaris adalah mayoritas dari pihak independen, serta semua anggota komite memiliki kompetensi, berkomitmen, serta memiliki wewenang yang memadai untuk menjalankan perannya secara efektif dan independen.<br>1.1.3 Untuk memastikan pemantauan atas pelaksanaan tugas Komite Audit berjalan obyektif dan independen, Komisaris Utama tidak boleh menjadi ketua Komite Audit, kecuali dalam keadaan luar biasa yang harus dijelaskan dalam laporan tahunan.<br>1.1.1 The Corporation has committees under the Board of Commissioners consisting of at least the Audit Committee, the Nomination and Remuneration Committee, and the Risk Management Monitoring Committee.<br>1.1.2 The Board of Commissioners ensures that all members of the Audit Committee are independent and other committees formed by the Board of Commissioners are majority independent parties, and all committee members have the competence, commitment, and sufficient authority to carry out their roles effectively and independently.<br>1.1.3 To ensure that monitoring of the implementation of the Audit Committee's duties is objective and independent, the President Commissioner may not be the chairman of the Audit Committee, except in extraordinary circumstances, which must be explained in the annual report. | **Diterapkan**<br>Komite Dibawah Dewan Komisaris terdiri dari Komite Audit, Komite Pemantau Risiko, Komite Remunerasi dan Nominasi serta Komite Tata Kelola Terintegrasi.<br><br>Anggota Komite Audit seluruhnya merupakan Komisaris Independen dan Pihak Independen. Informasi terkait Komite Audit telah dijelaskan secara rinci pada Laporan Tahunan ini.<br><br>Komisaris Utama Bank tidak menjadi bagian dari anggota Komite Audit.<br><br>**Apply**<br>The Committees under the Board of Commissioners consist of the Audit Committee, Risk Monitoring Committee, Remuneration and Nomination Committee and Integrated Governance Committee.<br><br>All members of the Audit Committee are Independent Commissioners and Independent Parties. Information related to the Audit Committee has been explained in detail in this Annual Report.<br><br>The Bank›s President Commissioner is not a member of the Audit Committee. |
| **1.5** | **Penilaian Kinerja – Dewan Komisaris dan Anggotanya**<br>1.5 Performance Assessment – Board of Commissioners and its Members | 1.5.1 Dewan Komisaris melakukan evaluasi formal tahunan secara obyektif untuk menentukan efektivitas Dewan, komitenya, dan setiap individu Komisaris.<br>1.5.1 The Board of Commissioners conducts an annual formal evaluation objectively to determine the effectiveness of the Board, its committees, and each individual Commissioner. | **Diterapkan**<br>Dewan Komisaris melakukan penilaian kinerja dan efektivitas secara kolegial.<br><br>**Apply**<br>The Board of Commissioners conducts a collegial assessment of performance and effectiveness. |
| **1.6** | **Benturan Kepentingan**<br>1.6 Conflict of Interest | 1.1.1 Anggota Direksi yang mempunyai rangkap jabatan di luar korporasi, harus mendapatkan persetujuan dari Dewan Komisaris. Seorang Komisaris memberi tahu Dewan Komisaris dan ketua komite yang menjalankan fungsi nominasi, sebelum menerima penunjukan baru sebagai Direktur atau Komisaris dari korporasi terbuka, jabatan Direktur lainnya atau posisi lain dengan komitmen waktu yang signifikan.<br>1.1.2 Dewan Komisaris memantau dan mengelola potensi benturan kepentingan manajemen, anggota Direksi, Dewan Komisaris dan pemegang saham, termasuk penyalahgunaan aset korporasi dan penyalahgunaan dalam transaksi pihak berelasi. Komisaris yang memiliki benturan kepentingan tidak turut serta dalam pemantauan dan pengambilan keputusan atas potensi benturan kepentingan yang melibatkan Komisaris atau afiliasi Komisaris yang bersangkutan.<br>1.1.1 Members of the Board of Directors who hold concurrent positions outside the corporation must obtain approval from the Board of Commissioners. A Commissioner shall notify the Board of Commissioners and the chair of the committee that performs the nomination function before accepting a new appointment as a Director or Commissioner of a public corporation, other Director positions, or other positions with significant time commitments.<br>1.1.2 The Board of Commissioners shall monitor and manage potential conflicts of interest of management, members of the Board of Directors, the Board of Commissioners, and shareholders, including misuse of corporate assets and misuse in related party transactions. Commissioners who have a conflict of interest shall not participate in monitoring and decision-making on potential conflicts of interest involving the Commissioner or affiliates of the Commissioner concerned. | **Diterapkan**<br>Tidak ada anggota Direksi Bank yang memiliki rangkap jabatan.<br><br>Dalam melakukan pengawasan, Dewan Komisaris berkomitmen untuk menghindari terjadinya potensi benturan kepentingan atau berupaya untuk menempatkan diri untuk tidak berada dalam potensi terjadinya benturan kepentingan dalam situasi apapun.<br><br>**Apply**<br>No member of the Bank›s Board of Directors holds dual positions.<br><br>In exercising its oversights, the Board of Commissioners is committed to avoiding potential conflicts of interest or trying to position itself to refrain from potential conflict of interest in any situation. |
| **1.7** | **Peningkatan Kompetensi Anggota Direksi dan Dewan Komisaris**<br>1.7 Improving the Competence of Members of the Board of Directors and Board of Commissioners | 1.7.1 Dewan Komisaris memastikan bahwa anggota Direksi dan Dewan Komisaris memahami peran dan tanggung jawab mereka, karakteristik dan operasi korporasi, peraturan perundang-undangan dan standar yang relevan serta kewajiban lain yang berlaku. Direksi melalui sekretaris korporasi mendukung semua anggota Direksi dan Dewan Komisaris dalam memperbarui dan menyegarkan keterampilan dan pengetahuan mereka yang diperlukan untuk menjalankan peran mereka di Dewan.<br>1.7.1 The Board of Commissioners ensures that members of the Board of Directors and Board of Commissioners understand their roles and responsibilities, the characteristics and operations of the corporation, relevant laws and regulations, standards and other applicable 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 their skills and knowledge required to carry out their roles on the Board. | **Diterapkan**<br>Dewan Komisaris bersama Direksi berkomitmen untuk konsisten melakukan pengembangan diri setiap tahunnya. Dewan Komisaris dan Direksi telah mengikuti pendidikan dan pelatihan dengan tujuan untuk meningkatkan kemampuan stategis, menambah pengetahuan bisnis, meningkatkan kepemimpinan, mengembangkan keterampilan baru, serta meningkatkan dan menjaga kualitas layanan perbankan yang dimiliki.<br><br>Adapun rincian pendidikan dan pelatihan yang diikuti Dewan Komisaris dan Direksi telah tertuang dalam Laporan Tahunan.<br><br>**Apply**<br>The Board of Commissioners and the Board of Directors are committed to consistently developing themselves every year. The Board of Commissioners and the Board of Directors have attended education and training with the aim of improving strategic capabilities, increasing business knowledge, improving leadership, developing new skills, and improving and maintaining the quality of banking services they have.<br><br>The details of the education and training attended by the Board of Commissioners and the Board of Directors have been stated in the Annual Report. |

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| **Prinsip 2: Komposisi dan Remunerasi Direksi dan Dewan Komisaris**<br>**Principle 2: Composition and Remuneration of the Board of Directors and Board of Commissioners** | | |
| **2.1 Komposisi Direksi dan Dewan Komisaris**<br>**2.1 Composition of the Board of Directors and Board of Commissioners** | 2.1.1 Dalam menentukan kandidat calon Direktur, Dewan Komisaris melalui Komite Nominasi dan Remunerasi tidak hanya mengandalkan rekomendasi dari Dewan Komisaris, manajemen atau pemegang saham mayoritas. Dewan Komisaris melalui Komite Nominasi dan Remunerasi dapat menggunakan sumber independen untuk menentukan kandidat yang memenuhi syarat.<br>2.1.2 Dewan Komisaris memastikan bahwa kriteria dalam menyeleksi anggota Direksi mencakup paling tidak pengetahuan, kemampuan, dan keahlian yang dibutuhkan untuk memenuhi secara tepat peran Direksi serta memperhatikan terpenuhinya keberagaman Direksi.<br>2.1.3 Kebijakan korporasi tentang keberagaman pada, Direksi dan Dewan Komisaris diungkapkan dalam Laporan Tahunan.<br>2.1.4 Dewan Komisaris memastikan bahwa kebijakan dan prosedur untuk seleksi dan nominasi Komisaris adalah jelas dan transparan sehingga dapat menghasilkan komposisi Dewan yang diinginkan. Dewan Komisaris menggunakan sumber independen untuk menentukan kandidat yang memenuhi syarat.<br>2.1.5 Dewan Komisaris/Komite yang menjalankan fungsi nominasi menetapkan prosedur dan kriteria nominasi yang konsisten dengan matriks keahlian Dewan Komisaris yang telah disetujui Dewan Komisaris dan memastikan bahwa profil kandidat memenuhi persyaratan yang ditetapkan dalam matriks keahlian dan kriteria nominasi.<br>2.1.6 Komposisi Dewan Komisaris harus dibentuk sedemikian rupa sehingga anggota-anggotanya secara kelompok mencerminkan keberagaman dalam hal kemampuan, keahlian, pengetahuan, pengalaman, usia, latar belakang budaya, dan jender yang dibutuhkan untuk memenuhi secara tepat peran Dewan Komisaris.<br>2.1.7 Untuk memampukan Dewan Komisaris dalam memberikan advis dan supervisi secara independen kepada Direksi dan untuk peran-peran yang terdapat potensi benturan kepentingan, Dewan Komisaris terdiri dari Komisaris Independen yang cukup jumlahnya, dengan masa jabatan yang dibatasi dan terdapat pengungkapan jangka waktu keanggotaan Dewan Komisaris serta independensi mereka dari sudut pandang korporasi.<br>2.1.8 Untuk memfasilitasi fungsi Direksi dan Dewan Komisaris yang efektif dan guna meningkatkan kepercayaan investor dan pemangku kepentingan, Komite Nominasi dan Remunerasi memastikan bahwa terdapat proses yang formal, ketat dan transparan untuk penunjukan dan pengangkatan anggota Direksi dan Dewan Komisaris.<br>2.1.1 In determining candidates for Director, the Board of Commissioners, through the Nomination and Remuneration Committee, does not only rely on recommendations from the Board of Commissioners, management, or majority shareholders. The Board of Commissioners, through the Nomination and Remuneration Committee, can use independent sources to determine qualified candidates.<br>2.1.2 The Board of Commissioners ensures that the criteria for selecting members of the Board of Directors include at least the knowledge, abilities, and expertise needed to properly fulfill the role of the Board of Directors and pay attention to the fulfillment of diversity of the Board of Directors.<br>2.1.3 The corporate policy on diversity in the Board of Directors and the Board of Commissioners is disclosed in the Annual Report.<br>2.1.4 The Board of Commissioners ensures that the policies and procedures for the selection and nomination of Commissioners are clear and transparent, ensuring that they can produce the desired composition of the Board. The Board of Commissioners uses independent sources to determine qualified candidates.<br>2.1.5 The Board of Commissioners/Committee carrying out the nomination function establishes nomination procedures and criteria that are consistent with the Board of Commissioners› expertise matrix that has been approved by the Board of Commissioners and ensures that the candidate profile meets the requirements set out in the expertise matrix and nomination criteria.<br>2.1.6 The composition of the Board of Commissioners must be formed in such a way that its members as a group reflect the diversity in terms of ability, expertise, knowledge, experience, age, cultural background, and gender required to properly fulfill the role of the Board of Commissioners.<br>2.1.7 To enable the Board of Commissioners to provide independent advice and supervision to the Board of Directors and for roles where there is a potential conflict of interest, the Board of Commissioners shall consist of a sufficient number of Independent Commissioners, with limited terms of office and disclosure of the term of membership of the Board of Commissioners and their independence from a corporate perspective.<br>2.1.8 To facilitate the effective functioning of the Board of Directors and the Board of Commissioners and to enhance investor and stakeholder confidence, the Nomination and Remuneration Committee shall ensure that there is a formal, rigorous, and transparent process for the appointment and promotion of members of the Board of Directors and the Board of Commissioners. | **Diterapkan**<br>Dalam menentukan kandidat calon Direktur, Dewan Komisaris Bank melalui Komite Remunerasi dan Nominasi dapat memilih calon anggota Direksi yang diusulkan oleh pihak internal maupun eksternal.<br><br>Bank mengatur minimum kriteria yang harus dimiliki oleh calon anggota Direksi Bank baik dari sisi integritas, kompetensi, reputasi, domisili, independensi, atau kriteria khusus lainnya sesuai bidang Direktur.<br><br>Kebijakan keberagaman komposisi Dewan Komisaris dan Direksi telah diungkapkan dalam Laporan Tahunan ini.<br><br>Bank telah mengatur kebijakan keberagaman komposisi anggota Dewan Komisaris dan Direksi, dan telah dijalankan sesuai perundang-undangan yang berlaku sehingga menghasilkan komposisi Dewan Komisaris yang di butuhkan Bank. Keberagaman komposisi Dewan Komisaris telah diungkapkan dalam Laporan Tahunan ini.<br><br>Komite Remunerasi & Nominasi juga telah melakukan fungsi dan tanggung jawabnya dalam memastikan proses remunerasi dan nominasi di Bank berjalan dengan benar dan transparan demi kepentingan Bank. Hal ini bisa dilihat pada pembahasan di Laporan Tahunan ini.<br><br>Pelaksanaan tugas Dewan Komisaris termasuk komposisi, masa jabatan, independensi, kehadiran rapat dan pelatihan di sepanjang tahun disampaikan secara detil pada Laporan Tahunan ini.<br><br>**Apply**<br>In determining candidate candidates for Director, the Bank›s Board of Commissioners through the Remuneration and Nomination Committee can select candidates for members of the Board of Directors proposed by internal or external parties.<br><br>The Bank governs the minimum criteria that candidates for members of the Bank›s Board of Directors shall have in terms of integrity, competence, reputation, domicile, independence, or other special criteria according to the Director›s field.<br><br>The policy on the diversity of the composition of the Board of Commissioners and the Board of Directors has been disclosed in this Annual Report.<br><br>The Bank has governed a policy on the diversity of the composition of members of the Board of Commissioners and the Board of Directors, and has been implemented in accordance with applicable laws to produce the composition of the Board of Commissioners required by the Bank. The diversity of the composition of the Board of Commissioners is disclosed in this Annual Report.<br><br>The Remuneration & Nomination Committee has also carried out its functions and responsibilities in ensuring that the remuneration and nomination process at the Bank runs properly and transparently for the benefit of the Bank. This can be seen in the discussion in this Annual Report.<br><br>The implementation of the duties of the Board of Commissioners including composition, term of office, independence, meeting attendance and training throughout the year are conveyed in details in this Annual Report. |

| Rekomendasi<br>Recommendation | | Penerapan<br>Implementation |
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| **2.2 Remunerasi Direksi dan Dewan Komisaris**<br>2.2 Remuneration of the Board of Directors and Board of Commissioners | 2.2.1 Kebijakan remunerasi anggota Direksi terdiri atas struktur remunerasi yang berorientasi pada pengembangan korporasi yang berkelanjutan dan mendorong pencapaian tujuan jangka panjang. Remunerasi Direksi harus diusulkan, dapat dengan melalui Komite Nominasi dan Remunerasi, oleh Dewan Komisaris untuk diputuskan oleh RUPS. Jumlah remunerasi yang diusulkan kepada RUPS tersebut ditetapkan dengan mempertimbangkan peran setiap anggota Direksi dan situasi ekonomi serta kinerja korporasi.<br>2.2.2 Kebijakan remunerasi anggota Dewan Komisaris terdiri atas struktur remunerasi yang berorientasi pada pengembangan korporasi yang berkelanjutan dan mendorong pencapaian tujuan jangka panjang. Jumlah remunerasi yang diusulkan Dewan Komisaris kepada RUPS tersebut ditetapkan dengan mempertimbangkan peran setiap anggota Dewan Komisaris dan situasi ekonomi serta kinerja korporasi. Di samping itu juga harus dipertimbangkan posisinya sebagai Komisaris Utama dan ketua serta keanggotaannya dalam komite-komite.<br>2.2.3 Untuk memastikan bahwa paket remunerasi ditentukan berdasarkan prestasi, kualifikasi dan kompetensi Direktur dan Komisaris dengan memperhatikan kinerja operasi korporasi, kinerja individu dan kondisi pasar, Komite Nominasi dan Remunerasi memastikan bahwa terdapat prosedur yang adil dan transparan untuk menetapkan kebijakan remunerasi anggota Direksi dan Dewan Komisaris.<br>2.2.1 The remuneration policy for members of the Board of Directors consists of a remuneration structure that is oriented towards sustainable corporate development and encourages the achievement of long-term goals. The remuneration of the Board of Directors must be proposed, possibly through the Nomination and Remuneration Committee, by the Board of Commissioners to be decided by the GMS. The amount of remuneration proposed to the GMS is determined by considering the role of each member of the Board of Directors and the economic situation and performance of the corporation.<br>2.2.2 The remuneration policy for members of the Board of Commissioners consists of a remuneration structure that is oriented towards sustainable corporate development and encourages the achievement of long-term goals. The amount of remuneration proposed by the Board of Commissioners to the GMS is determined by considering the role of each member of the Board of Commissioners and the economic situation and performance of the corporation. In addition, their positions as President Commissioner and chairman and their membership in the committees must also be considered.<br>2.2.3 To ensure that the remuneration package is determined based on the achievements, qualifications, and competencies of the Directors and Commissioners by considering the performance of corporate operations, individual performance, and market conditions, the Nomination and Remuneration Committee ensures that there is a fair and transparent procedure for determining the remuneration policy for members of the Board of Directors and the Board of Commissioners. | **Diterapkan**<br>Bank memiliki dan menjalankan Kebijakan Remunerasi dan dilakukan kaji ulang secara berkala. Kebijakan remunerasi Bank disusun dengan mengedepankan sistem remunerasi yang kompetitif, adil dan seimbang, berdasarkan peraturan perundang-undangan yang berlaku.<br><br>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.<br><br>Komite Remunerasi dan Nominasi melakukan pembahasan atas remunerasi Dewan Komisaris dengan mempertimbangkan informasi atas kisaran serta standar remunerasi yang berlaku di industri sejenis (peers group) serta kemampuan Bank. Remunerasi Dewan Komisaris dan Direksi ditetapkan oleh RUPS.<br><br>**Apply**<br>The Bank has and implements a Remuneration Policy and reviews it periodically. The Bank›s remuneration policy is prepared by prioritizing a competitive, fair and balanced remuneration system, based on applicable laws and regulations.<br><br>The Bank prepares the structure, policies, and amount of remuneration for each member of the Board of Commissioners by considering the duties, authorities, performance, and responsibilities of the Board of Commissioners. The Bank also considers the remuneration applicable amongst its peers group) and the Bank›s capabilities.<br><br>The Remuneration and Nomination Committee discusses the remuneration of the Board of Commissioners by considering information on the range and standards of remuneration applicable in similar industries (peers group) and the Bank›s capabilities. The remuneration of the Board of Commissioners and the Board of Directors is determined by the GMS. |
| **Prinsip 3: Hubungan Kerja antara Direksi dan Dewan Komisaris**<br>Principle 3: Working Relationship between the Board of Directors and the Board of Commissioners | | |
| **3.1 Sifat Hubungan Kerja**<br>3.1 Nature of Working Relationship | 3.1.1 Terdapat diskusi yang terbuka antara Direksi dengan Dewan Komisaris serta di antara para anggota Direksi dan para anggota Dewan Komisaris. Namun, tetap penting menjaga kerahasiaan informasi agar tidak terjadi kebocoran informasi rahasia.<br>3.1.2 Sesuai dengan tugas dan perannya masing-masing, Direksi bekerja sama dengan Dewan Komisaris dalam merumuskan misi, visi dan strategi korporasi dan secara reguler membahas pengimplementasiannya.<br>3.1.3 Sekretaris Korporasi memiliki peran penting dalam mendukung efektivitas hubungan kerja antara Direksi dengan Dewan Komisaris, mendorong implementasi praktek governansi korporat yang baik, termasuk komunikasi yang efektif dengan pemegang saham dan pemangku kepentingan lainnya.<br>3.1.1 There is an open discussion between the Board of Directors and the Board of Commissioners and between the members of the Board of Directors and the members of the Board of Commissioners. However, it is still important to maintain the confidentiality of information to prevent leakage of confidential information.<br>3.1.2 In accordance with their respective duties and roles, the Board of Directors works together with the Board of Commissioners in formulating the mission, vision, and corporate strategy and regularly discusses its implementation.<br>3.1.3 The Corporate Secretary has an important role in supporting the effectiveness of the 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. | **Diterapkan**<br>Diskusi Direksi dan Dewan Komisaris dapat dilakukan melalui rapat Gabungan Dewan Komisaris bersama dengan Direksi. Hasil diskusi tersebut di catat pada risalah rapat yang bersifat confidential.<br><br>Setiap tahun, strategi dan kebijakan Bank dalam jangka pendek dan menengah disusun dalam bentuk Rencana Bisnis Bank (RBB) sesuai dengan Visi dan Misi yang telah ditetapkan. Secara berkala, Direksi bersama Dewan Komisaris melakukan evaluasi berkala terhadap strategi dan kebijakan Bank serta implementasinya di seluruh level organisasi.<br><br>Bank menunjuk Retno Tri Wulandari sebagai Sekretaris Perusahaan berdasarkan Surat Keputusan Direksi SK.015/2017/PRESDIR tanggal 16 Mei 2017. Sekretaris Perusahaan Bank bertanggung jawab untuk memelihara citra Bank dan melindungi kepentingan Bank dengan membangun komunikasi dan hubungan baik dengan semua pihak serta sebagai penghubung antara Bank dengan Pemegang Saham serta Pemangku Kepentingan lainnya. |

| Rekomendasi<br>Recommendation | | Penerapan<br>Implementation |
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| | | **Apply**<br>Discussions between the Board of Directors and the Board of Commissioners can be conducted through a Joint Meeting of the Board of Commissioners together with the Board of Directors. The results of the discussion are recorded in confidential minutes of the meeting.<br><br>Every year, the Bank›s short and medium-term strategies and policies are prepared in the form of a Bank Business Plan (RBB) in accordance with the established Vision and Mission. Periodically, the Board of Directors together with the Board of Commissioners conduct periodic evaluations of the Bank›s strategies and policies and their implementation at all levels of the organization.<br><br>The Bank appointed Retno Tri Wulandari as Corporate Secretary based on the Decree of the Board of Directors SK.015/2017/PRESDIR dated 16 May 2017. The Bank›s Corporate Secretary is responsible for maintaining the Bank›s image and protecting the Bank›s interests by building good communication and relationships with all parties and as a liaison between the Bank and Shareholders and other Stakeholders. |
| **3.2 Akses informasi Dewan Komisaris**<br>3.2 Access to information of the Board of Commissioners | 3.2.1 Direksi bertanggung jawab untuk memastikan Dewan Komisaris mendapatkan akses informasi yang akurat, relevan dan tepat waktu. Dewan Komisaris sendiri memastikan bahwa ia memperoleh informasi yang memadai. Direksi menyediakan informasi kepada Dewan Komisaris secara teratur, tanpa penundaan dan secara komprehensif tentang semua masalah yang relevan dengan korporasi. Dewan Komisaris sewaktu-waktu dapat meminta Direksi untuk memberikan informasi tambahan.<br>3.2.1 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 the Board of Directors to provide additional information. | **Diterapkan**<br>Dewan Komisaris dapat berinteraksi dengan Direksi baik secara langsung maupun melalui rapat Dewan Komisaris bersama Direksi yang sudah dijadwalkan maupun pada masa tertentu jika ada informasi/peristiwa yang material harus disampaikan kepada Dewan Komisaris.<br><br>Sekretaris Perusahaan juga membantu Direksi menyediakan akses informasi yang akurat, relevan dan tepat waktu kepada Dewan Komisaris, diantaranya undangan dan materi rapat Gabungan Dewan Komisaris bersama Direksi. Sekretaris Perusahaan juga mengadministrasikan, mendistribusikan serta menindaklanjuti surat masuk yang diterima Bank dan ditujukan kepada Direksi dan/atau Dewan Komisaris.<br><br>**Apply**<br>The Board of Commissioners can interact with the Board of Directors either directly or through scheduled joint meetings of the Board of Commissioners with the Board of Directors or at certain times if there is material information/events that must be conveyed to the Board of Commissioners.<br><br>The Corporate Secretary also assists the Board of Directors in providing access to accurate, relevant and timely information to the Board of Commissioners, including invitations and materials for joint meetings of the Board of Commissioners with the Board of Directors. The Corporate Secretary also administers, distributes and follows up on incoming letters received by the Bank and addressed to the Board of Directors and/or Board of Commissioners. |
| **3.3 Tanggung jawab Direksi dan Dewan Komisaris atas Dampak Struktur**<br>3.3 Responsibility of the Board of Directors and Board of Commissioners for the Impact of the Structure | 3.3.1 Dampak struktur kepemilikan terhadap korporasi. Direksi dan Dewan Komisaris mempertimbangkan tanggung jawabnya dalam konteks struktur kepemilikan saham dan hubungan antar-pemegang saham korporasi yang mungkin berdampak terhadap pengelolaan dan operasi korporasi.<br>3.3.1 Impact of ownership structure on the corporation. The Board of Directors and the Board of Commissioners consider their responsibilities in the context of the corporation's share ownership structure and relationships between shareholders that may impact the management and operations of the corporation. | **Diterapkan**<br>Direksi dan Dewan Komisaris Bank memastikan bahwa struktur pemegang saham dan hubungan antar-pemegang saham tidak mempengaruhi pelaksanaan peran dan tanggung jawab Direksi dan Dewan Komisaris Bank. Seluruh keputusan dan kebijakan yang diambil Direksi dan Dewan Komisaris Bank diambil secara independen dan transparan demi kepentingan Bank.<br><br>**Apply**<br>The Board of Directors and Board of Commissioners of the Bank ensure that the shareholder structure and relationships between shareholders do not affect the implementation of the roles and responsibilities of the Board of Directors and Board of Commissioners of the Bank. All decisions and policies taken by the Board of Directors and Board of Commissioners of the Bank are taken independently and transparently for the benefit of the Bank. |

| Rekomendasi<br>Recommendation | | Penerapan<br>Implementation |
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| **Prinsip 4: Perilaku Etis dan Bertanggung jawab**<br>**Principle 4: Ethical and Responsible Behavior** | | |
| **4.1 Pedoman Etika dan Perilaku**<br>**4.1 Code of Ethics and Conduct** | 4.1.1 Pernyataan ini dituangkan dalam Pedoman Perilaku dan Etika Usaha yang harus secara jelas mengungkapkan harapan korporasi bahwa setiap anggota Direksi dan Dewan Komisaris serta karyawan akan:<br>a. Bertindak untuk kepentingan terbaik korporasi;<br>b. Bertindak dengan jujur dan dengan integritas berstandar tinggi;<br>c. Bersikap independen dan bertindak berdasarkan informasi yang lengkap, dengan itikad baik, dengan uji tuntas dan kehati-hatian;<br>d. Mematuhi peraturan perundang-undangan yang berlaku bagi korporasi dan operasinya;<br>e. Menghindari tindakan yang melanggar peraturan perundang-undangan atau tindakan yang tidak etis berdasarkan pedoman etika korporasi;<br>f. 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;<br>g. 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.<br>h. Tidak memanfaatkan jabatannya atau peluang yang dihasilkan oleh jabatannya untuk kepentingan pribadi;<br>i. 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;<br>j. Menghormati perbedaan pendapat dan hak-hak setiap anggota Direksi, Dewan Komisaris, dan karyawan;<br>k. 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;<br>4.1.2 Direksi menetapkan kebijakan dan praktik anti pencucian uang dan pendanaan terorisme, anti suap, antikorupsi, antikecurangan (antifraud), keterlibatan dalam politik dengan mengacu pada standar nasional atau internasional mengenai anti pencucian uang, anti suap, antikorupsi, antikecurangan atau standar terkait lainnya.<br>4.1.1 This statement is set out in the Code of Conduct and Business Ethics, which must clearly express the corporation's expectation that each member of the Board of Directors and Board of Commissioners and employee will:<br>a. Act in the best interests of the corporation;<br>b. Act honestly and with high standards of integrity;<br>c. Be independent and act based on complete information, in good faith, with due diligence and prudence;<br>d. Comply with laws and regulations applicable to the corporation and its operations;<br>e. Avoid actions that violate laws and regulations or actions that are unethical based on the corporate ethics guidelines;<br>f. Not engage or participate in any activity that would create a conflict of interest with the best interests of the corporation or that would negatively impact the corporation's reputation;<br>g. Not take advantage of the property or information owned by the corporation, other asset ownership, or its customers for personal gain or that causes losses to the corporation and its customers.<br>h. Not take advantage of his/her position or opportunities generated by his/her position for personal gain;<br>i. Avoiding the act of requesting or receiving from third parties payments, gratuities, or other benefits for oneself or for others that give rise to a conflict of interest/providing benefits to third parties in violation of laws and regulations;<br>j. Respecting differences of opinion and the rights of each member of the Board of Directors, Board of Commissioners, and employees;<br>k. Ensuring complete, fair, accurate, timely, and understandable disclosure in reports and documents submitted by the corporation to regulators and in other public communications;<br>4.1.2 The Board of Directors establishes policies and practices for anti-money laundering and terrorism financing, anti-bribery, anti-corruption, anti-fraud, and involvement in politics by referring to national or international standards on anti-money laundering, anti-bribery, anti-corruption, anti-fraud, or other related standards. | **Diterapkan**<br>Bank memiliki Kebijakan Kode Etik dan Pedoman Tingkah Laku sebagaimana tertuang dalam Surat Keputusan No.SK.114/2023/PRESDIR-HCSS dan SOP Sistem Manajemen Anti Penyuapan melalui Surat Keputusan No. SK.039/2021/Dir1-Comp yang wajib ditaati oleh Direksi, Dewan Komisaris dan seluruh karyawan.<br>Pelaksanaan dan penerapan Kode Etik & Kode Perilaku dan Kebijakan Anti suap dan Korupsi menjadi tanggung jawab seluruh manajemen dan karyawan di seluruh jenjang organisasi yang dituangkan dalam Deklarasi Pakta Integritas, Kode Etik dan Komitmen Antisuap dan Korupsi yang ditandatangani oleh Direksi dan Dewan Komisaris serta diatestasi oleh seluruh karyawan setiap tahunnya.<br><br>Informasi lebih lengkap disampaikan dalam Laporan Tahunan ini.<br><br>**Apply**<br>The Bank has a Code of Ethics Policy and Guidelines for Conduct as stated in Decree No.SK.114/2023/PRESDIR-HCSS and SOP for the Anti-Bribery Management System through Decree No. SK.039/2021/Dir1-Comp which must be obeyed by the Board of Directors, Board of Commissioners and all employees.<br><br>The implementation and application of the Code of Ethics & Code of Conduct and Anti-Bribery and Corruption Policy is the responsibility of all management and employees at all levels of the organization as stated in the Declaration of Integrity Pact, Code of Ethics and Anti-Bribery and Corruption Commitment signed by the Board of Directors and Board of Commissioners and attested by all employees annually.<br><br>More complete information is provided in this Annual Report. |

| Rekomendasi<br>Recommendation | | Penerapan<br>Implementation |
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| **4.2 Nilai–nilai dan Budaya Organisasi**<br>4.2 Organizational Values and Culture | 4.2.1 Korporasi mengartikulasikan, menumbuhkan dan mengungkapkan budaya dan nilai-nilai korporasi<br>4.2.1 The corporation articulates, cultivates and expresses its corporate culture and values. | **Diterapkan**<br>Bank menerapkan nilai dan budaya kerja agar setiap lini organisasi dapat menjalankan operasional dengan baik dan mencegah terjadinya berbagai tindakan fraud, pencucian uang dan pendanaan terorisme, anti korupsi, penawaran atau penerimaan suap serta pembayaran atau bujukan-bujukan lainnya untuk melakukan perbuatan yang melanggar peraturan perundang-undangan.<br><br>Proses internalisasi nilai dan budaya perusahaan dalam kehidupan pekerjaan sehari-hari yang telah dilakukan oleh Bank telah disampaikan pada Laporan Tahunan ini.<br><br>**Apply**<br>The Bank implements work values and culture so that every line of the organization can carry out operations properly and prevent various acts of fraud, money laundering and terrorism financing, anti-corruption, offering or accepting bribes and other payments or inducements to commit acts that violate laws and regulations.<br><br>The process of internalizing corporate values and culture in daily work life that has been carried out by the Bank has been conveyed in this Annual Report. |
| **4.3 Penegakan dan Komunikasi Pedoman Etika, Nilai- nilai dan Budaya**<br>4.3 Enforcement and Communication of Code of Ethics, Values and Culture | 4.3.1 Pedoman perilaku dan kode etik korporasi dikomunikasikan secara efektif kepada Direksi, Dewan Komisaris, serta seluruh karyawan, diintegrasikan ke dalam strategi dan operasi korporasi termasuk sistem manajemen risiko dan struktur remunerasi, serta ditegakkan.<br>4.3.1 The corporate code of conduct and code of ethics are effectively communicated to the Board of Directors, Board of Commissioners and all employees, integrated into the corporate strategy and operations including the risk management system and remuneration structure, and enforced. | **Diterapkan**<br>Internalisasi Kode Etik & Kode Perilaku dilakukan secara berkala melalui berbagai media yang tersedia guna menumbuhkan kesadaran dan pemahaman untuk menerapkan perilaku yang sesuai dengan Nilai Utama Bank. Secara berkala, anggota Dewan Komisaris dan Direksi menandatangani Pakta Integritas, Kode Etik dan Komitmen Antisuap dan Korupsi, diikuti atestasi pakta yang sama oleh seluruh karyawan Bank.<br><br>Informasi lebih lengkap disampaikan dalam Laporan Tahunan ini.<br><br>**Apply**<br>Internalization of the Code of Ethics & Code of Conduct is carried out periodically through various available media in order to raise awareness and understanding to implement behavior in accordance with the Bank›s Core Values. Periodically, members of the Board of Commissioners and Board of Directors sign the Integrity Pact, Code of Ethics and Anti-Bribery and Corruption Commitment, followed by attestation of the same pact by all Bank employees.<br><br>More complete information is presented in this Annual Report. |
| **Prinsip 5: Manajemen Risiko, Pengendalian Internal dan Kepatuhan**<br>Principle 5: Risk Management, Internal Control and Compliance | | |
| **5.1 Pengendalian Internal dan Kepatuhan**<br>5.1 Internal Control and Compliance | 5.1.1 Direksi melakukan reviu secara berkala atas ketepatan desain dan efektivitas operasional sistem governansi, pengelolaan risiko, pengendalian internal dan kepatuhan korporasi dan melaporkan pelaksanaan dan hasil reviu kepada para pemegang saham melalui laporan tahunan Korporasi.<br>5.1.1 The Board of Directors conducts regular reviews of the appropriateness of the design and operational effectiveness of the governance system, risk management, internal control, and corporate compliance and reports the implementation and results of the review to shareholders through the Corporation's annual report. | **Diterapkan**<br>Direksi telah melaksanakan Sistem Pengendalian Intern sesuai dengan prinsip-prinsip pengendalian dan evaluasi yang dilakukan Bank secara keseluruhan memperlihatkan kualitas Sistem Pengendalian Intern Bank berjalan dengan baik. Direksi dan Dewan Komisaris menyatakan bahwa Bank telah memiliki sistem pengendalian intern yang efektif dan memadai dalam mengelola risiko-risiko yang dihadapi Bank tetap berada dalam batas toleransi (risk appetite) dalam mendukung pencapaian tujuan Bank.<br><br>Pembahasan terkait Komite Pemantau Risiko dan Sistem Pengendalian Intern telah disampaikan pada Laporan Tahunan ini.<br><br>**Apply**<br>The Board of Directors has implemented the Internal Control System in accordance with the principles of control and evaluation carried out by the Bank as a whole, showing that the quality of the Bank›s Internal Control System is running well. The Board of Directors and the Board of Commissioners stated that the Bank has an effective and adequate internal control system in managing the risks faced by the Bank, remaining within the tolerance limit (risk appetite) in supporting the achievement of the Bank›s objectives.<br><br>Discussion related to the Risk Monitoring Committee and Internal Control System has been presented in this Annual Report. |

| Rekomendasi<br>Recommendation | | Penerapan<br>Implementation |
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| **5.2 Manajemen Risiko**<br>**5.2 Risk Management** | 5.2.1 Strategi dan risiko merupakan satu kesatuan, diungkapkan secara transparan, masuk ke dalam pelaksanaan tugas dan tanggung jawab Direksi dan Dewan Komisaris, serta dalam diskusi di rapat Dewan Komisaris dan Direksi.<br>5.2.2 Komite Pemantau Manajemen Risiko membantu pelaksanaan tugas Dewan Komisaris dengan menciptakan mekanisme yang transparan, fokus, dan independen dalam pengawasan manajemen risiko korporasi.<br>5.2.1 Strategy and risk are one entity, expressed transparently, included in the implementation of the duties and responsibilities of the Board of Directors and the Board of Commissioners, and in discussions at meetings of the Board of Commissioners and the Board of Directors.<br>5.1.2 The Risk Management Monitoring Committee assists the implementation of the duties of the Board of Commissioners by creating a transparent, focused, and independent mechanism for supervising corporate risk management. | **Diterapkan**<br>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.<br><br>Dewan Komisaris dan Direksi dibantu oleh Komite Pemantau Risiko dan Komite Manajemen Risiko secara berkala memantau dan mengkaji efektifitas pengendalian dan pengelolaan risiko.<br><br>Dewan Komisaris memiliki Komite Pemantau Risiko yang beranggotakan Komisaris Independen dan Pihak Independen yang berkompeten dan memiliki latar belakang sesuai dengan peraturan dan kebutuhan Bank. Komite Pemantau Risiko membantu memastikan bahwa penerapan manajemen risiko Bank tetap memenuhi unsur-unsur kecukupan prosedur dan metodologi pengelolaan risiko, sehingga kegiatan usaha Bank tetap dapat terkendali pada batas/limit yang dapat diterima dan menguntungkan Bank.<br><br>Informasi lebih lengkap telah disampaikan dalam Laporan Tahunan ini<br><br>**Apply**<br>The Board of Commissioners and the Board of Directors consistently manage and monitor the Bank›s main risks well. Balancing risk, compliance culture and capital adequacy is also a strategic pillar policy of the Bank.<br><br>The Board of Commissioners and the Board of Directors are assisted by the Risk Monitoring Committee and the Risk Management Committee to periodically monitor and review the effectiveness of risk control and management.<br><br>The Board of Commissioners has a Risk Monitoring Committee consisting of Independent Commissioners and Independent Parties who are competent and have backgrounds in accordance with the Bank›s regulations and needs. The Risk Monitoring Committee helps ensure that the implementation of the Bank›s risk management continues to meet the elements of adequacy of risk management procedures and methodologies, so that the Bank›s business activities can remain controlled within acceptable limits and benefit the Bank.<br><br>More complete information has been presented in this Annual Report. |
| **5.3 Integrasi Governansi, Manajemen Risiko dan Kepatuhan**<br>**5.3 Integration of Governance, Risk Management and Compliance** | 5.3.1 Direksi membangun sistem governansi, manajemen risiko, dan kepatuhan (GRC) yang terintegrasi, dengan menangani berbagai ketidakpastian secara terpadu dan dengan integritas yang tinggi, untuk meyakinkan bahwa korporasi dapat mencapai tujuannya.<br>5.3.2 Direksi memastikan bahwa bagian yang membawahi fungsi kepatuhan tidak merangkap melaksanakan fungsi yang berpotensi menimbulkan benturan kepentingan.<br>5.3.1 The Board of Directors builds 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 goals.<br>5.3.2 The Board of Directors ensures that the party in charge of the compliance function does not concurrently carry out functions that have the potential to cause a conflict of interest. | **Diterapkan**<br>Direksi memastikan adanya koordinasi dan peningkatan kapabilitas di antara sistem utama GRC yang meliputi sistem governansi, manajemen strategi, manajemen kinerja, manajemen risiko, manajemen kepatuhan, dan sistem audit internal agar korporasi tetap berada pada jalur yang benar dalam mencapai tujuannya.<br><br>Direktur Kepatuhan juga tidak merangkap melakanakan fungsi yang berpotensi menimbulkan benturan kepentingan sebagaimana digambarkan dalam Struktur Organisasi Bank dalam Laporan Tahunan ini.<br><br>**Apply**<br>The Board of Directors ensures coordination and capability enhancement among the GRC main systems, which include the governance system, strategy management, performance management, risk management, compliance management, and internal audit system so that the corporation remains on the right track in achieving its objectives.<br><br>The Compliance Director also does not concurrently perform functions that have the potential to cause conflicts of interest as described in the Bank's Organizational Structure in this Annual Report. |
| **5.4 Audit Internal**<br>**5.4 Internal Audit** | 5.4.1 Dewan Komisaris melalui Komite Audit memantau dan memastikan bahwa fungsi audit internal membantu korporasi untuk mencapai tujuannya dengan membawa pendekatan yang objektif dan disiplin untuk mengevaluasi dan meningkatkan efektivitas manajemen risiko, pengendalian internal, dan governansi korporat.<br>5.4.1 The Board of Commissioners, through the Audit Committee, monitors and ensures that the internal audit function helps the corporation achieve its objectives by bringing an objective and disciplined approach to evaluating and improving the effectiveness of risk management, internal control, and corporate governance. | **Diterapkan**<br>Dewan Komisaris memiliki Komite Audit yang memastikan pelaksanaan tugas audit internal telah dilakukan secara objektif dan independen. Pengangkatan dan pemberhentian Kepala Audit Internal juga memperhatikan rekomendasi dari Komite Audit, serta internal audit memiliki akses langsung kepada Komite Audit.<br><br>**Apply**<br>Apply<br><br>The Board of Commissioners has an Audit Committee that ensures the implementation of internal audit duties has been carried out objectively and independently. The appointment and dismissal of the Head of Internal Audit also takes into account the recommendations of the Audit Committee, and internal audit has direct access to the Audit Committee. |

| Rekomendasi<br>Recommendation | | Penerapan<br>Implementation |
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| **Prinsip 6: Pengungkapan dan Transparansi**<br>Principle 6: Disclosure and Transparency | | |
| **6.1 Kebijakan Pengungkapan**<br>6.1 Disclosure Policy | 6.1.1 Korporasi memiliki kebijakan dan prosedur pengungkapan dan transparansi yang memastikan pengungkapan informasi material dan menjaga informasi sensitif serta rahasia korporasi.<br>6.1.2 Hak pemegang saham untuk memperoleh secara teratur dan tepat waktu informasi material yang relevan tentang korporasi harus dipenuhi.<br>6.1.1 The corporation has disclosure and transparency policies and procedures that ensure disclosure of material information and safeguard sensitive and confidential corporate information.<br>6.1.2 The right of shareholders to receive timely and regular relevant material information about the corporation must be fulfilled. | **Diterapkan**<br>Bank memiliki Kebijakan Komunikasi dengan Pemegang Saham dan Investor melalui Surat Keputusan No. SK.102/2021/PRESDIR-CorSec yang mengatur pengungkapan informasi material dan menjaga informasi sensitif serta rahasia, serta kewajiban pengungkapan/ keterbukaan informasi berdasarkan peraturan berlaku. Bank memastikan seluruh pemegang saham memiliki hak yang sama dalam menerima informasi material secara benar, tepat waktu, berkala dan sesuai peraturan yang berlaku.<br><br>**Apply**<br>The Bank has a Communication Policy with Shareholders and Investors through Decree No. SK.102/2021/PRESDIR-CorSec which regulates the disclosure of material information and maintaining sensitive and confidential information, as well as the obligation to disclose/open information based on applicable regulations. The Bank ensures that all shareholders have the same rights to receive material information correctly, on time, periodically and in accordance with applicable regulations. |
| **6.2 Laporan Keuangan dan Keberlanjutan**<br>6.2 Financial and Sustainability Reports | 6.2.1 Korporasi mengungkapkan sistem dan prosedur untuk memastikan bahwa laporan keuangan interim yang tidak diaudit atau direviu oleh auditor eksternal secara material adalah akurat, lengkap, dan memberikan investor informasi yang tepat untuk membuat keputusan investasi yang tepat.<br>6.2.2 Komite Audit memastikan kualitas audit laporan keuangan yang dilaksanakan oleh auditor eksternal. Kegiatan ini termasuk merekomendasikan penunjukan, penunjukan kembali dan, jika perlu, pemberhentian dan remunerasi auditor eksternal.<br>6.2.3 Laporan keberlanjutan harus disiapkan dan diungkapkan dengan akurat dan disusun sesuai kerangka pelaporan keberlanjutan nasional atau internasional.<br>6.2.4 Korporasi menerbitkan laporan tahunan secara terintegrasi yang menempatkan kinerja historis ke dalam konteks dan menggambarkan risiko, peluang, dan prospek korporasi di masa depan, sehingga membantu pemegang saham dan pemangku kepentingan memahami tujuan strategis korporasi dan kemajuannya dalam menciptakan nilai yang berkelanjutan.<br>6.2.1 The corporation discloses the systems and procedures to ensure that interim financial statements that are not audited or reviewed by external auditors are materially accurate and complete and provide investors with the right information to make informed investment decisions.<br>6.2.2 The Audit Committee ensures the quality of the audit of financial statements performed by external auditors. This activity includes recommending the appointment, reappointment, and, if necessary, the dismissal and remuneration of external auditors.<br>6.2.3 The sustainability report must be prepared and disclosed accurately and prepared in accordance with a national or international sustainability reporting framework.<br>6.2.4 The corporation publishes an integrated annual report that places historical performance in context and describes the corporation's future risks, opportunities, and prospects, thereby helping shareholders and stakeholders understand the corporation's strategic objectives and its progress in creating sustainable value. | **Diterapkan**<br>Bank memiliki sistem dan prosedur yang mengatur pengendalian internal atas pelaporan keuangan, termasuk laporan keuangan interim, peran fungsi manajemen risiko/ kepatuhan/pengawasan manajemen dan fungsi audit internal dalam memastikan integritas laporan keuangan interim, dan peran Komite Audit dalam mereviu laporan keuangan yang akan dipublikasikan oleh Bank.<br><br>Komite Audit Bank memastikan kualitas audit laporan keuangan yang dilaksanakan oleh auditor eksternal. Kegiatan ini termasuk merekomendasikan penunjukan, penunjukan kembali dan, jika perlu, pemberhentian dan remunerasi auditor eksternal.<br><br>Laporan Keberlanjutan Bank disusun sesuai kerangka pelaporan yang berlaku.<br><br>Laporan Tahunan Bank telah mencantumkan kinerja historis dalam konteks dan menggambarkan risiko, peluang, dan prospek korporasi di masa depan.<br><br>**Apply**<br>The Bank has systems and procedures that govern internal control over financial reporting, including interim financial reports, the role of the risk management/compliance/ management oversight function and the internal audit function in ensuring the integrity of interim financial reports, and the role of the Audit Committee in reviewing the financial reports to be published by the Bank.<br><br>The Bank›s Audit Committee ensures the quality of the financial report audits carried out by the external auditor. This activity includes recommending the appointment, reappointment and, if necessary, the dismissal and remuneration of the external auditor.<br><br>The Bank›s Sustainability Report is prepared in accordance with the applicable reporting framework.<br><br>The Bank›s Annual Report has included historical performance in context and describes the risks, opportunities and future prospects of the corporation. |

| Rekomendasi<br>Recommendation | | | Penerapan<br>Implementation |
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| **6.3 Diseminasi Informasi**<br>6.3 Dissemination of Information | 6.3.1 | Saluran penyebaran informasi harus menyediakan akses yang setara, tepat waktu, dan relatif murah untuk informasi yang relevan bagi pengguna.<br>Information dissemination channels must provide equal, timely, and relatively inexpensive access to relevant information for users. | **Diterapkan**<br>Bank secara berkala memperbarui dan memberikan kemudahan akses informasi seputar aktivitas dan kinerjanya kepada para pemangku kepentingan agar mengetahui kondisi Bank secara jelas dan terbuka. Berbagai sarana komunikasi yang tersedia termasuk media sosial, situs web, email blast dan paparan publik bagi nasabah dan publik, siaran pers, serta sarana komunikasi khusus internal untuk karyawan Bank Sinarmas, diantaranya:<br>• Pertemuan, interaksi dan diskusi dengan pemegang saham, investor melalui Public Expose.<br>• Situs web dan media sosial yang dimiliki Bank (Facebook, Instagram, Twitter, Youtube dan LinkedIn) dan siaran pers<br><br>**Apply**<br>The Bank regularly updates and provides easy access to information about its activities and performance to stakeholders to let them know the Bank›s condition clearly and openly. Various means of communication available include social media, websites, email blasts and public exposures for customers and the public, press releases, and special internal communication facilities for Bank Sinarmas employees, including:<br>• Meetings, interactions and discussions with shareholders, investors through Public Expose.<br>• Websites and social media owned by the Bank (Facebook, Instagram, Twitter, Youtube and LinkedIn) and press releases |
| | 6.3.2 | Korporasi memastikan bahwa pernyataan tahunan terhadap penerapan Pedoman Umum Governansi Korporat Indonesia, termasuk penjelasan atas penerapan atas masing-masing Rekomendasi dan Panduan tersedia di situs web selama jangka waktu minimal lima tahun<br>Corporations ensure that annual statements on the implementation of the General Guidelines for Indonesian Corporate Governance, including explanations on the implementation of each Recommendation and Guideline, are available on the website for a minimum period of five years | |
| | 6.3.3 | Untuk korporasi yang terdaftar di pasar modal di yurisdiksi selain yurisdiksi asal, peraturan perundang- undangan atas governansi korporat yang berlaku harus di diungkapkan dengan jelas. Dalam hal cross listing, kriteria dan prosedur cross listing, kriteria dan prosedur untuk mengakui persyaratan listing untuk listing utama harus transparan dan didokumentasikan<br>For corporations listed on a capital market in a jurisdiction other than the home jurisdiction, applicable corporate governance laws and regulations must be clearly disclosed. In the case of cross-listing, the criteria and procedures for cross-listing and the criteria and procedures for recognizing listing requirements for the primary listing must be transparent and documented | |
| **Prinsip 7: Perlindungan terhadap Hak- Hak Pemegang Saham**<br>**Principle 7: Protection of Shareholders' Rights** | | | |
| **7.1 Hak Pemegang Saham**<br>7.1 Shareholder Rights | 7.1.1 | Korporasi memiliki suatu kebijakan komunikasi yang memfasilitasi dan mendorong partisipasi pemegang saham atau investor.<br>The corporation has a communications policy that facilitates and encourages shareholder or investor participation. | **Diterapkan**<br>Bank memiliki Kebijakan Komunikasi dengan Pemegang Saham dan Investor melalui Surat Keputusan No. SK.102/2021/PRESDIR-CorSec. yang dapat menjadi acuan bagi anak perusahaan.<br><br>**Apply**<br>The Bank has a Communication Policy with Shareholders and Investors through Decree No. SK.102/2021/PRESDIR-CorSec. which can be a reference for subsidiaries. |
| | 7.1.2 | Korporasi yang merupakan entitas induk memastikan bahwa kebijakan governansi korporatnya berlaku bagi entitas anak dan entitas sepengendali yang di dalamnya investasi korporasi adalah signifikan.<br>The corporation, which is a parent entity, ensures that its corporate governance policy applies to subsidiaries and entities under common control in which the corporation has significant investments. | |
| | 7.1.3 | Korporasi memiliki aturan dan prosedur yang mengatur akuisisi, pengambil alihan, dan transaksi luar biasa seperti merger dan penjualan aset korporasi yang substansial untuk memastikan transaksi terjadi secara transparan dan dalam kondisi yang wajar dan melindungi hak-hak semua pemegang saham sesuai dengan kelasnya.<br>The corporation has rules and procedures governing acquisitions, takeovers, and extraordinary transactions such as mergers and sales of substantial corporate assets to ensure that transactions occur transparently and on fair terms and protect the rights of all shareholders according to their class. | |

| Rekomendasi<br>Recommendation | | | Penerapan<br>Implementation |
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| **7.2** | **Perlakuan Adil Terhadap Pemegang Saham**<br>7.2 Fair Treatment of Shareholders | 7.2.1 Korporasi memiliki aturan dan prosedur yang memastikan a). semua pemegang saham dari seri yang sama dalam satu kelas saham harus diperlakukan setara, b). 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.<br>7.2.2 Korporasi memiliki aturan dan prosedur yang memastikan transaksi pihak berelasi disetujui dan dilaksanakan sedemikian rupa yang dapat meyakinkan bahwa benturan kepentingan telah dikelola dengan tepat, dan melindungi kepentingan korporasi dan pemegang saham.<br>7.2.3 Korporasi memiliki dan mengungkapkan kebijakan untuk mencegah terjadinya insider trading. Korporasi memiliki aturan yang jelas mengenai perdagangan apa pun dalam saham korporasi yang dilakukan oleh Direktur, Komisaris dan orang dalam untuk memastikan bahwa siapa pun tidak boleh mendapatkan keuntungan secara langsung atau tidak langsung dari informasi yang tidak/belum tersedia di pasar.<br>7.2.1 The Corporation has rules and procedures that ensure a) all shareholders of the same series in a class of shares are treated equally and b) disclosure of such rules and procedures and disclosure of capital structures and arrangements that allow certain shareholders to obtain influence or control disproportionate to their share ownership.<br>7.2.2 The Corporation has rules and procedures that ensure related party transactions are approved and implemented in a manner that ensures that conflicts of interest are appropriately managed and protects the interests of the Corporation and its shareholders.<br>7.2.3 The Corporation has and discloses a policy to prevent insider trading. The Corporation has clear rules regarding any trading in the Corporation's shares by Directors, Commissioners, and insiders to ensure that no person may benefit directly or indirectly from information that is not/not yet available in the market. | **Diterapkan**<br>Sesuai dengan Anggaran Dasar Bank, Pemegang Saham memiliki hak yang sama yakni masing-masing saham memiliki hak atas 1 (satu) suara.<br><br>Bank senantiasa memastikan transaksi pihak berelasi yang dilaksanakan tidak memiliki benturan kepentingan serta kepentingan Bank dan pemegang saham telah terlindungi.<br><br>Pengungkapan untuk mencegah terjadinya insider trading, salah satunya tertuang dalam Pedoman Kode Etik & Perilaku. Bank juga memiliki Kebijakan Transaksi Afiliasi dan Transaksi Benturan Kepentingan serta Transaksi Material dan Perubahan Kegiatan Usaha.<br><br>**Apply**<br>In accordance with the Bank›s Articles of Association, Shareholders have the same rights, namely each share has the right to 1 (one) vote.<br><br>The Bank always ensures that related party transactions carried out do not have a conflict of interest and that the interests of the Bank and shareholders are protected.<br><br>Disclosures to prevent insider trading, one of which is stated in the Code of Ethics & Behavior Guidelines. The Bank also has a Policy on Affiliated Transactions and Conflict of Interest Transactions as well as Material Transactions and Changes in Business Activities. |

| Rekomendasi<br>Recommendation | | | Penerapan<br>Implementation |
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| **7.3 Rapat Umum Pemegang Saham**<br>7.3 General Meeting of Shareholders | 7.3.1 | Korporasi melakukan panggilan RUPS dengan agenda dan materi RUPS selengkap dan sedini mungkin (paling lambat 28 hari sebelum RUPS) untuk memberikan waktu dan materi yang cukup bagi pemegang saham untuk mempelajari dengan baik agenda rapat. Undangan rapat dan seluruh informasi RUPS diungkapkan melalui sarana elektronik seperti melalui situs web korporasi. | **Diterapkan**<br>Bank melakukan Panggilan RUPS paling lambat 28 (dua puluh delapan) hari sebelum RUPS, dengan tidak memperhitungkan tanggal pemanggilan dan pelaksanaan RUPS serta lengkap dengan agenda dan materi RUPS di situs web Bank.<br><br>Mekanisme pengambilan keputusan/pemungutan suara RUPS disampaikan dalam Tata Tertib RUPS yang disampaikan di situs web Bank dan dibacakan kembali pada saat dimulainya RUPS. Pemungutan suara dilakukan untuk masing-masing agenda RUPST (satu keputusan) dan menunjuk pihak independen Biro Administrasi Efek dan Notaris. untuk melakukan perhitungan suara.<br><br>**Apply**<br>The Bank shall issue a GMS Invitation no later than 28 (twenty eight) days before the GMS, excluding the date of the invitation and implementation of the GMS and complete with the agenda and materials of the GMS on the Bank›s website.<br><br>The mechanism for decision-making/voting at the GMS is stated in the GMS Rules of Procedure which are stated on the Bank›s website and read out again at the start of the GMS. Voting is conducted for each GMS agenda (one decision) and appoints an independent party, the Securities Administration Bureau and Notary. to count the votes. |
| | 7.3.2 | Korporasi memiliki dan mengungkapkan aturan dan prosedur yang memfasilitasi pemegang saham dalam berpartisipasi dan memberikan suara secara efektif di RUPS. | |
| | 7.3.3 | Pemegang saham berpartisipasi efektif dalam menetapkan penunjukan anggota Direksi dan Dewan Komisaris. | |
| | 7.3.4 | Korporasi memastikan transparansi dan akuntabilitas auditor eksternal di RUPS. | |
| | 7.3.5 | Penyampaian hasil pemungutan suara dan ringkasan risalah RUPS secara lengkap diumumkan ke publik pada hari kerja berikutnya. | |
| | 7.3.1 | The Corporation issues a GMS invitation with the agenda and materials of the GMS as complete and as early as possible (no later than 28 days before the GMS) to provide sufficient time and materials for shareholders to study the meeting agenda properly. The meeting invitation and all GMS information are disclosed through electronic means, such as through the corporation's website. | |
| | 7.3.2 | The Corporation has and discloses rules and procedures that facilitate shareholders in participating and voting effectively at the GMS. | |
| | 7.3.3 | Shareholders participate effectively in determining the appointment of members of the Board of Directors and Board of Commissioners. | |
| | 7.3.4 | The Corporation ensures transparency and accountability of external auditors at the GMS. | |
| | 7.3.5 | The submission of the voting results and a complete summary of the minutes of the GMS are announced to the public on the following working day. | |
| **Prinsip 8: Penghargaan terhadap Pemangku Kepentingan**<br>Principle 8: Appreciation to Stakeholders | | | |
| **8.1 Keterlibatan Pemangku Kepentingan Kunci (*stakeholder engagement*)**<br>8.1 Key Stakeholder Engagement | 8.1.1 | Korporasi melalui Sekretaris Korporasi melaksanakan komunikasi yang regular, transparan dan efektif dengan pemangku kepentingan kunci serta melibatkan mereka untuk memahami harapan dan keluhan mereka serta dampak korporasi terhadap mereka. | **Diterapkan**<br>Bank telah melaksanakan komunikasi yang regular, transparan dan efektif dengan pemangku kepentingan kunci. Bank juga memiliki Whistleblowing System sebagai sarana penyampaian saran, masukan dan keluhan/ pengaduan yang aman dan independen.<br><br>**Apply**<br>The Bank has implemented regular, transparent and effective communication with key stakeholders. The Bank also has a Whistleblowing System as a means of delivering suggestions, input and complaints safely and independently. |
| | 8.1.1 | The corporation, through the Corporate Secretary, carries out regular, transparent, and effective communication with key stakeholders and involves them to understand their expectations and complaints and the impact of the corporation on them. | |
| **8.2 Integrasi Keberlanjutan dalam Model Bisnis**<br>8.2 Integration of Sustainability into Business Models | 8.2.1 | Dewan Komisaris bersama-sama dengan Direksi bertanggung jawab, akuntabel dan transparan atas governansi keberlanjutan, termasuk menetapkan strategi, prioritas, dan target keberlanjutan korporasi. Direksi dan Dewan Komisaris memasukkan pertimbangan keberlanjutan ketika menjalankan perannya, termasuk antara lain dalam pengembangan dan implementasi strategi korporasi, rencana bisnis, rencana aksi utama dan manajemen risiko. | **Diterapkan**<br>Direksi memastikan bahwa strategi, prioritas dan sasaran keberlanjutan Bank serta kinerja Bank dikomunikasikan kepada para pemangku kepentingan sebagaimana dilaporkan dalam Laporan Tahunan ini.<br><br>**Apply**<br>The Board of Directors ensures that the Bank›s sustainability strategies, priorities and targets as well as the Bank›s performance are communicated to stakeholders as reported in this Annual Report. |
| | 8.2.1 | The Board of Commissioners, together with the Board of Directors, is responsible, accountable, and transparent for sustainability governance, including setting corporate sustainability strategies, priorities, and targets. The Board of Directors and the Board of Commissioners incorporate sustainability considerations when carrying out their roles, including, among others, in the development and implementation of corporate strategies, business plans, key action plans, and risk management. | |
| **8.3 Perlindungan terhadap Pemangku Kepentingan**<br>8.3 Protection of Stakeholders | 8.3.1 | Direksi memastikan dan mengungkapkan bahwa operasi korporasi mencerminkan penerapan standar etika, tanggung jawab sosial dan lingkungan yang tinggi di seluruh korporasi dan memastikan bahwa kebijakan dan prosedur yang tepat diterapkan untuk menghormati serta mematuhi hak-hak pemangku kepentingan. | **Diterapkan**<br>Bank memiliki berbagai kebijakan sebagai pedoman dalam menjalankan 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 dan Laporan Keberlanjutan Bank.<br><br>**Apply**<br>The Bank has various policies as guidelines in conducting business in accordance with ethics, social and environmental responsibility and respecting and complying with stakeholder rights. This is conveyed in full in the Bank›s Annual Report and Sustainability Report. |
| | 8.3.2 | Direksi mendorong karyawan bekerja untuk kepentingan jangka panjang korporasi dan mengedepankan keberlanjutan. | |
| | 8.3.1 | The Board of Directors ensures and discloses that the corporation's operations reflect the application of high standards of ethics and social and environmental responsibility throughout the corporation and ensures that appropriate policies and procedures are implemented to respect and comply with stakeholder rights. | |
| | 8.3.2 | The Board of Directors encourages employees to work for the long-term interests of the corporation and prioritizes sustainability. | |

## Sosialisasi Tata Kelola

Dalam rangka meningkatkan budaya penerapan GCG di lingkungan Bank Sinarmas, manajemen melakukan sosialisasi secara berkala terkait dengan prinsip-prinsip GCG, kepatuhan, dan lain-lain yang relevan. Uraian pelaksanaannya disampaikan dalam tabel di bawah ini.

## Socialization of Governance

In order to improve the culture of GCG implementation in Bank Sinarmas, management conducts periodic socialization related to GCG principles, compliance, and other relevant matters. The implementation description is presented in the table below.

| Kegiatan Sosial<br>Social Activities | Jumlah Sosialisasi<br>Number of Socialization |
|---|---|
| *Compliance Info (Co.In)* | 17 |
| *Regulation Update* | 42 |
| Campaign Anti Penyuapan I Anti-Bribery Campaign | 12 |

1. ***Compliance Info***

   Kampanye kepatuhan melalui media komunikasi *Compliance Info (Co.In)* dilakukan dengan tujuan untuk menyajikan sosialisasi dan *refreshment* ketentuan Otoritas Jasa Keuangan, Bank Indonesia, Pusat Pelaporan dan Analisis Transaksi Keuangan, dan peraturan perundang-undangan. Materi kampanye disajikan secara menarik melalui infografis, sehingga mudah dipahami oleh seluruh karyawan. Materi tersebut disampaikan melalui *email*.

   Pada tahun 2024, 17 (tujuh belas) *Compliance Info (Co. In)* telah disosialisasikan kepada karyawan Bank, dengan uraian sebagai berikut.

1. **Compliance Info**

   The compliance campaign through the Compliance Info (Co.In) communication media is carried out with the aim of presenting socialization and refreshment of the provisions of the Financial Services Authority, Bank Indonesia, the Financial Transaction Reports and Analysis Center, and laws and regulations. The campaign material is presented in an attractive manner through infographics, ensuring that it is easy to understand by all employees. The material is delivered via email.

   In 2024, 17 (seventeen) Compliance Info (Co.In) have been socialized to Bank employees, with the following description.

| No. | Tanggal Terbit<br>Date of Issuance | Perihal Compliance Info<br>Subject of Compliance Info |
|---|---|---|
| 1. | 05 Maret 2024<br>March 5, 2024 | Compliance Info: Komite dalam Bank Umum<br>Compliance Info: Committees in Commercial Banks |
| 2. | 01 April 2024<br>April 1, 2024 | Compliance Info: Pelaporan TKT (Transaksi Keuangan Tunai) Secara Manual di Cabang<br>Compliance Info: Manual Reporting of TKT (Cash Financial Transactions) at Branches |
| 3. | 24 Juni 2024<br>June 24, 2024 | Compliance Info: Pemberitahuan PIC Pelaporan TKT Secara Manual Divisi APU PPT & PPPSPM<br>Compliance Info: PIC Notification of Manual TKT Reporting of APU PPT & PPPSPM Division |
| 4. | 24 Juni 2024<br>June 24, 2024 | Compliance Info: Kewajiban Identifikasi *Beneficial Owner*<br>Compliance Info: Beneficial Owner Identification Obligations |
| 5. | 08 Juli 2024<br>July 8, 2024 | Compliance Info : Penerapan Prinsip Tata Kelola yang Baik pada Bank<br>Compliance Info: Implementation of Good Governance Principles in Banks |
| 6. | 30 Juli 2024<br>July 30, 2024 | Compliance Info : Klausula Pernyataan Bank Bahwa "Bank Berizin dan Diawasi" Sesuai Ketentuan Regulator<br>Compliance Info: Bank Statement Clause That "Bank is Licensed and Supervised" According to Regulatory Provisions |
| 7. | 05 September 2024<br>September 5, 2024 | Compliance Info : Kewajiban Bank Sinarmas Dalam Melakukan Transaksi Valuta Asing<br>Compliance Info: Bank Sinarmas' Obligations in Conducting Foreign Exchange Transactions |
| 8. | 09 September 2024<br>September 9, 2024 | Compliance info : Konglomerasi Keuangan Sinar Mas<br>Compliance info : Sinar Mas Financial Conglomerate |
| 9. | 10 September 2024<br>September 10, 2024 | Compliance Info : *Business Email Compromise* (BEC) |
| 10. | 13 September 2024<br>September 13, 2024 | Compliance Info : *Screening Watchlist* pada *Front End System* (Pega CS)<br>Compliance Info : Screening Watchlist on Front End System (Pega CS) |
| 11. | 24 September 2024<br>September 24, 2024 | Compliance Info : Rekening Khusus Dana Kampanye Pemilihan Gubernur dan Wakil Gubernur, Bupati dan Wakil Bupati, serta Walikota dan Wakil Walikota<br>Compliance Info: Special Account for Campaign Funds for the Election of Governor and Deputy Governor, Regent and Deputy Regent, and Mayor and Deputy Mayor |
| 12. | 03 Oktober 2024<br>October 3, 2024 | Compliance Info : Tingkat Bunga Penjaminan Lembaga Penjamin Simpanan (LPS) Periode 1 Oktober 2024 - 31 Desember 2024<br>Compliance Info: Deposit Insurance Corporation (LPS) Guaranteed Interest Rate for the Period October 1, 2024 - December 31, 2024 |

| No. | Tanggal Terbit<br>Date of Issuance | Perihal Compliance Info<br>Subject of Compliance Info |
|---|---|---|
| 13. | 25 Oktober 2024<br>October 25, 2024 | Compliance Info : Pemberitahuan Pergantian PIC Pelaporan TKT (Transaksi Keuangan Tunai) Secara Manual Divisi APU PPT & PPPSPM<br>Compliance Info: Notification of Change of PIC for Manual Reporting of TKT (Cash Financial Transactions) in the APU PPT & PPPSPM Division |
| 14. | 04 November 2024<br>November 4, 2024 | Compliance Info : Negara *High Risk* dan *Sanction Country*<br>Compliance Info: High Risk Countries and Sanction Countries |
| 15. | 05 November 2024<br>November 5, 2024 | Compliance Info : Perubahan Formulir Pemilik Manfaat (*Beneficial Owner*/BO)<br>Compliance Info: Changes to the Beneficial Owner (BO) Form |
| 16. | 21 November 2024<br>November 21, 2024 | Compliance Info : Informasi Perpanjangan Relaksasi Kebijakan Kartu Kredit Tahun 2024 dari Bank Indonesia<br>Compliance Info: Information on the Extension of Credit Card Policy Relaxation in 2024 from Bank Indonesia |
| 17. | 28 November 2024<br>November 28, 2024 | Compliance Info : Indonesia Anti *Scam Centre* (IASC) |



**2. *Regulation Update***

Satuan Kerja Kepatuhan juga melakukan sosialisasi peraturan baru dari regulator disertai kajian dampak dan tindak lanjut atas peraturan tersebut melalui *Email Regulation Update*. *Email Regulation Update* disampaikan kepada Unit Kerja terkait, Direksi, Dewan Komisaris, Pejabat Eksekutif, Pimpinan Karyawan serta karyawan unit-unit kerja terkait.

Pada tahun 2024, Satuan Kerja Kepatuhan telah membuat dan melakukan sosialisasi 42 (empat puluh dua) *Regulation Update*, dengan uraian sebagai berikut.

**2. Regulation Update**

The Compliance Work Unit also disseminates new regulations from regulators along with impact studies and follow-ups on these regulations via Email Regulation Update. Email Regulation Update is delivered to related Work Units, the Board of Directors, the Board of Commissioners, Executive Officers, Employee Leaders, and employees of related work units.

In 2024, the Compliance Work Unit has created and disseminated 42 (forty-two) Regulation Updates with the following descriptions.

| No. | Perihal Ketentuan Bank Indonesia<br>Subject of Bank Indonesia Provisions |
|---|---|
| 1. | Peraturan Bank Indonesia No. 15 Tahun 2023 tentang Perubahan Ketiga atas Peraturan Bank Indonesia No. 22/14/PBI/2020 tentang Operasi Moneter<br>Bank Indonesia Regulation Number 15 of 2023 concerning the Third Amendment to Bank Indonesia Regulation Number 22/14/PBI/2020 concerning Monetary Operations |
| 2. | Peraturan Bank Indonesia No. 1 Tahun 2024 tentang Jumlah dan Nilai Nominal Uang Rupiah yang Dimusnahkan Tahun 2023<br>Bank Indonesia Regulation No. 1 of 2024 concerning the Amount and Nominal Value of Rupiah Currency Destroyed in 2023 |
| 3. | Peraturan Bank Indonesia No. 3 Tahun 2024 tentang Lembaga Alternatif Penyelesaian Sengketa<br>Bank Indonesia Regulation No. 3 of 2024 concerning Alternative Dispute Resolution Institutions |
| 4. | Peraturan Bank Indonesia No. 5 Tahun 2024 tentang Standarisasi Kompetensi di Bidang Sistem Pembayaran<br>Bank Indonesia Regulation No. 5 of 2024 concerning Competency Standardization in the Payment System Field |
| 5. | Peraturan Bank Indonesia No. 6 Tahun 2024 tentang Pasar Uang dan Pasar Valuta Asing<br>Bank Indonesia Regulation No. 6 of 2024 concerning Money Market and Foreign Exchange Market |
| 6. | Peraturan Anggota Dewan Gubernur No. 19 Tahun 2023 tentang Perubahan Kelima atas Peraturan Anggota Dewan Gubernur No. 21/25/APDG/2019 tentang Rasio *Loan To Value* untuk Kredit Properti, Rasio *Financing To Value* untuk Pembiayaan Properti, dan Uang Muka untuk Kredit Atau Pembiayaan Kendaraan Bermotor<br>Board of Governors Member Regulation No. 19 of 2023 concerning the Fifth Amendment to Board of Governors Member Regulation No. 21/25/APDG/2019 concerning Loan-to-Value Ratio for Property Credit, Financing-to-Value Ratio for Property Financing, and Down Payment for Motor Vehicle Credit or Financing |
| 7. | Peraturan Anggota Dewan Gubernur No. 20 Tahun 2023 tentang Tata Cara Pelaksanaan Pelindungan Konsumen Bank Indonesia<br>Board of Governors Member Regulation No. 20 of 2023 concerning Procedures for Implementing Bank Indonesia Consumer Protection |
| 8. | Peraturan Anggota Dewan Gubernur No. 21 Tahun 2023 tentang Peraturan Pelaksanaan Pinjaman Likuiditas Jangka Panjang Bagi Bank Umum Konvensional<br>Regulation of the Member of the Board of Governors No. 21 of 2023 concerning the Implementation Regulation of Long-Term Liquidity Loans for Conventional Commercial Banks |
| 9. | Peraturan Anggota Dewan Gubernur No. 22 Tahun 2023 tentang Perubahan atas Peraturan Anggota Dewan Gubernur No. 22/26/PADG/2020 tentang Kepesertaan Operasi Moneter<br>Board of Governors Member Regulation No. 22 of 2023 concerning Amendments to Board of Governors Member Regulation No. 22/26/PADG/2020 concerning Participation in Monetary Operations |
| 10. | Peraturan Anggota Dewan Gubernur No. 2 Tahun 2024 tentang *Dealer* Utama<br>Board of Governors Member Regulation No. 2 of 2024 concerning Primary Dealers |

| No. | Perihal Ketentuan Bank Indonesia<br>Subject of Bank Indonesia Provisions |
|---|---|
| 11 | 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<br>Board of Governors Member Regulation No. 4 of 2024 concerning Amendments to Board of Governors Member Regulation No. 11 of 2023 concerning Implementation Regulations for Macroprudential Liquidity Incentive Policies |
| 12. | 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<br>Board of Governors Member Regulation No. 5 of 2024 concerning Amendments to Board of Governors Member Regulation No. 21/12/PADG/2019 concerning Implementation of Scheduled Fund Transfers and Clearing by Bank Indonesia |
| 13. | 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<br>Board of Governors Member Regulation No. 6 of 2024 concerning Amendments to Board of Governors Member Regulation No. 4 of 2023 concerning Export Proceeds and Import Payments |
| 14. | Peraturan Anggota Dewan Gubernur No. 7 Tahun 2024 tentang Peraturan Pelaksanaan Rasio Pendanaan Luar Negeri Bank<br>Board of Governors Member Regulation No. 7 of 2024 concerning Implementation Regulations for Bank Foreign Funding Ratios |
| 15. | Peraturan Anggota Dewan Gubernur No. 8 Tahun 2024 tentang Perubahan Keenam atas Peraturan Anggota Dewan Gubernur No. 20/15/PADG/2018 tentang Penyelenggaran Setelmen Dana Seketika Melalui Sistem Bank Indonesia *Real Time Gross Settlement*<br>Board of Governors Member Regulation No. 8 of 2024 concerning the Sixth Amendment to Board of Governors Member Regulation No. 20/15/PADG/2018 concerning Implementation of Fund Settlement Instantly Through Bank Indonesia Real Time Gross Settlement System |
| 16. | Peraturan Anggota Dewan Gubernur No. 10 Tahun 2024 tentang Penyelesaian Transaksi Bilateral antara Indonesia dan Korea Selatan Menggunakan Rupiah dan Won<br>Board of Governors Member Regulation No. 10 of 2024 concerning Settlement of Bilateral Transactions between Indonesia and South Korea Using Rupiah and Won |
| 17. | Peraturan Anggota Dewan Gubernur No. 11 Tahun 2024 tentang Transaksi Pasar Valuta Asing<br>Board of Governors Member Regulation No. 11 of 2024 concerning Foreign Exchange Market Transactions |
| 18. | Peraturan Anggota Dewan Gubernur No. 12 Tahun 2024 tentang Peraturan Pelaksanaan Perizinan Terpadu Bank Indonesia Melalui *Front Office* Perizinan<br>Board of Governors Member Regulation No. 12 of 2024 concerning Implementation Regulation of Bank Indonesia's Integrated Licensing Through the Licensing Front Office |
| 19. | Peraturan Anggota Dewan Gubernur No. 13 Tahun 2024 tentang Transaksi Pasar Uang<br>Board of Governors Member Regulation No. 13 of 2024 concerning Money Market Transactions |
| 20. | Peraturan Anggota Dewan Gubernur No. 14 Tahun 2024 tentang Perubahan Kedua atas Peraturan Anggota Dewan Gubernur No. 22/20/PADG/2020 tentang Penyelesaian Transaksi Bilateral Indonesia dan Jepang Menggunakan Rupiah dan Yen Melalui Bank<br>Board of Governors Member Regulation No. 14 of 2024 concerning the Second Amendment to Board of Governors Member Regulation No. 22/20/PADG/2020 concerning Settlement of Bilateral Transactions between Indonesia and Japan Using Rupiah and Yen Through Banks |
| 21. | Peraturan Anggota Dewan Gubernur No. 15 Tahun 2024 tentang Perubahan atas Peraturan Anggota Dewan Gubernur No. 23/16/PADG/2021 tentang Penyelesaian Transaksi Bilateral Antara Indonesia dan Tiongkok Menggunakan Rupiah dan Yuan Melalui Bank<br>Board of Governors Member Regulation No. 15 of 2024 concerning Amendments to Board of Governors Member Regulation No. 23/16/PADG/2021 concerning Settlement of Bilateral Transactions Between Indonesia and China Using Rupiah and Yuan Through Banks |
| 22. | Peraturan Anggota Dewan Gubernur No. 19 Tahun 2024 tentang Perubahan Keenam atas Peraturan Anggota Dewan Gubernur No. 21/25/PADG/2019 tentang Rasio *Loan to Value* untuk Kredit Properti, Rasio *Financing to Value* untuk Pembiayaan Properti, dan Uang Muka untuk Kredit atau Pembiayaan Kendaraan Bermotor<br>Board of Governors Member Regulation No. 19 of 2024 concerning the Sixth Amendment to Board of Governors Member Regulation No. 21/25/PADG/2019 concerning the Loan-to-Value Ratio for Property Credit, Financing-to-Value Ratio for Property Financing, and Down Payment for Motor Vehicle Credit or Financing |

| No. | Perihal Ketentuan Otoritas Jasa Keuangan<br>Subject of Financial Services Authority Provisions |
|---|---|
| 1. | Peraturan Otoritas Jasa Keuangan No. 18 Tahun 2023 tentang Penerbitan dan Persyaratan Efek Bersifat Utang dan Sukuk Berlandaskan Keberlanjutan<br>Financial Services Authority Regulation No. 18 of 2023 concerning the Issuance and Requirements of Debt Securities and Sukuk Based on Sustainability |
| 2. | Peraturan Otoritas Jasa Keuangan No. 20 Tahun 2023 tentang Produk Asuransi yang Dikaitkan dengan Kredit atau Pembiayaan Syariah dan Produk *Suretyship* atau *Suretyship* Syariah<br>Financial Services Authority Regulation No. 20 of 2023 concerning Insurance Products Linked to Sharia Credit or Financing and Suretyship Products or Sharia Suretyship |
| 3. | Peraturan Otoritas Jasa Keuangan No. 21 Tahun 2023 tentang Layanan Digital oleh Bank Umum<br>Financial Services Authority Regulation No. 21 of 2023 concerning Digital Services by Commercial Banks |
| 4. | Peraturan Otoritas Jasa Keuangan No. 22 Tahun 2023 tentang Pelindungan Konsumen Dan Masyarakat Pada Sektor Jasa Keuangan<br>Financial Services Authority Regulation No. 22 of 2023 concerning Consumer and Community Protection in the Financial Services Sector |
| 5. | Peraturan Otoritas Jasa Keuangan No. 29 Tahun 2023 tentang Pembelian Kembali Saham yang Dikeluarkan oleh Perusahaan Terbuka<br>Financial Services Authority Regulation No. 29 of 2023 concerning Buyback of Shares Issued by Public Companies |
| 6. | Peraturan Otoritas Jasa Keuangan No. 4 Tahun 2024 tentang Laporan Kepemilikan atau Setiap Perubahan Kepemilikan Saham Perusahaan Terbuka dan Laporan Aktivitas Menjaminkan Saham Perusahaan Terbuka<br>Financial Services Authority Regulation No. 4 of 2024 concerning Reports on Ownership or Any Changes in Ownership of Shares of Public Companies and Reports on Activities of Pledge of Shares of Public Companies |

| No. | Perihal Ketentuan Otoritas Jasa Keuangan<br>Subject of Financial Services Authority Provisions |
|---|---|
| 7. | Peraturan Otoritas Jasa Keuangan No. 5 Tahun 2024 tentang Penetapan Status Pengawasan dan Penanganan Permasalahan Bank Umum<br>Financial Services Authority Regulation No. 5 of 2024 concerning Determination of Supervisory Status and Handling of Problems of Commercial Banks |
| 8. | 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<br>Financial Services Authority Regulation No. 11 of 2024 concerning the Second Amendment to Financial Services Authority Regulation No. 18/POJK.03/2017 concerning Reporting and Requesting Debtor Information Through the Financial Information Service System |
| 9. | Peraturan Otoritas Jasa Keuangan No. 12 Tahun 2024 tentang Penetapan Strategi Anti *Fraud* Bagi Lembaga Jasa Keuangan<br>Financial Services Authority Regulation No. 12 of 2024 concerning Determination of Anti-Fraud Strategy for Financial Services Institutions |
| 10. | Peraturan Otoritas Jasa Keuangan No. 13 Tahun 2024 tentang Transparansi dan Publikasi Suku Bunga Kredit Bank Umum Konvensional<br>Financial Services Authority Regulation No. 13 of 2024 concerning Transparency and Publication of Conventional Commercial Bank Credit Interest Rates |
| 11. | Surat Edaran Otoritas Jasa Keuangan No. 24/SEOJK.03/2023 tentang Penilaian Tingkat Maturitas Digital Bank Umum<br>Financial Services Authority Circular Letter No. 24/SEOJK.03/2023 concerning Assessment of Digital Maturity Level of Commercial Banks |
| 12. | Surat Edaran Otoritas Jasa Keuangan No. 29/SEOJK.03/2022 tentang Ketahanan dan Keamanan Siber bagi Bank Umum<br>Financial Services Authority Circular Letter No. 29/SEOJK.03/2022 concerning Cyber Resilience and Security for Commercial Banks |
| 13. | Surat Edaran Otoritas Jasa Keuangan No. 9/SEOJK.05/2024 tentang Penilaian Kualitas atas Tagihan Subrogasi, Kegiatan Penjaminan, dan *Suretyship*<br>Financial Services Authority Circular Letter No. 9/SEOJK.05/2024 concerning Quality Assessment of Subrogation Claims, Guarantee Activities, and Suretyship |

| No. | Perihal Ketentuan Peraturan Perundang-Undang Lainnya<br>Subject of Other Provisions of Laws and Regulations |
|---|---|
| 1. | Undang - Undang No. 1 Tahun 2024 tentang Perubahan Kedua UU No. 1 Tahun 2008 tentang Informasi dan Transaksi Elektronik<br>Law No. 1 of 2024 concerning the Second Amendment to Law No. 1 of 2008 concerning Electronic Information and Transactions |
| 2. | Keputusan Menteri Keuangan Republik Indonesia No. 188 Tahun 2024 tentang Penyelesaian Kewajiban Pembayaran Atas Pelaksanaan Tambahan Subsidi Bunga/Subsidi Marjin Kredit Usaha Rakyat.<br>Decree of the Minister of Finance of the Republic of Indonesia No. 188 of 2024 concerning Settlement of Payment Obligations for the Implementation of Additional Interest Subsidies/Margin Subsidies for People's Business Credit. |
| 3. | Peraturan Pemerintah No. 22 Tahun 2024 tentang Perlakuan Pajak Penghasilan atas Penghasilan dari Penempatan Devisa Hasil Ekspor Sumber Daya Alam pada Instrumen Moneter dan/atau Instrumen Keuangan Tertentu di Indonesia<br>Government Regulation No. 22 of 2024 concerning Income Tax Treatment on Income from Placement of Foreign Exchange Proceeds from Exports of Natural Resources in Certain Monetary Instruments and/or Financial Instruments in Indonesia |
| 4. | Peraturan Menteri Koordinator Bidang Perekonomian No. 7 Tahun 2024 tentang Perubahan Kedua atas Peraturan Menteri Koordinator Bidang Perekonomian No. 1 Tahun 2022 tentang Pedoman Pelaksanaan Kredit Usaha Rakyat<br>Regulation of the Coordinating Minister for Economic Affairs No. 7 of 2024 concerning the Second Amendment to Regulation of the Coordinating Minister for Economic Affairs No. 1 of 2022 concerning Guidelines for the Implementation of People's Business Credit |
| 5. | Peraturan Menteri Keuangan Nomor 47 Tahun 2024 tentang Perubahan Ketiga atas Peraturan Menteri Keuangan Nomor 70/PMK.03/2017 tentang Petunjuk Teknis Mengenai Akses Informasi Keuangan untuk Kepentingan Bersama<br>Minister of Finance Regulation No. 47 of 2024 on the Third Amendment to Minister of Finance Regulation No. 70/PMK.03/2017 on Technical Guidelines Regarding Access to Financial Information for Mutual Interest |
| 6. | Peraturan Lembaga Jasa Simpanan No. 1 Tahun 2024 tentang Premi Program Restrukturisasi Perbankan<br>Regulation of the Deposit Service Institution No. 1 of 2024 concerning Premiums for the Banking Restructuring Program |
| 7. | Keputusan Menteri Keuangan Republik Indonesia No. 338 Tahun 2024 tentang Perubahan atas Keputusan Menteri Keuangan Republik Indonesia No. 317 Tahun 2024 tentang Besaran Subsidi Bunga/Subsidi Marjin Kredit Usaha Rakyat<br>Decree of the Minister of Finance of the Republic of Indonesia No. 338 of 2024 concerning Amendments to Decree of the Minister of Finance of the Republic of Indonesia No. 317 of 2024 concerning the Amount of Interest Subsidies/Margin Subsidies for People's Business Credit |

**3. *Campaign* Anti Penyuapan**

Bank juga membuat kampanye kepatuhan lain melalui *email* serta media *online* lainnya, yaitu kampanye Anti Penyuapan, kepada seluruh karyawan sebagai wujud pencegahan tindakan penyuapan maupun gratifikasi di dalam lingkungan Bank.

Selama tahun 2024, Bank melaksanakan 12 (dua belas) *Campaign* Anti Penyuapan, dengan rincian sebagai berikut.

**3. Anti-Bribery Campaign**

The Bank also created another compliance campaign via email and other online media, namely the Anti-Bribery campaign, for all employees as a form of preventing bribery and gratification within the Bank's environment.

In 2024, the Bank implemented 12 (twelve) Anti-Bribery Campaigns, with the following details.

| No. | Tanggal Terbit<br>Date of Issuance | *Campaign* Anti Penyuapan<br>Anti-Bribery Campaign |
|---|---|---|
| 1. | 01 Februari 2024<br>February 1, 2024 | [UAP] Kebijakan Pemberian/Penerimaan Hadiah<br>[UAP] Gift Giving/Receiving Policy |
| 2. | 06 Februari 2024<br>February 6, 2024 | [UAP] Tata Tertib Berpolitik di Lingkungan Perusahaan<br>[UAP] Procedures for Engaging in Politics within the Company Environment |
| 3. | 01 April 2024<br>April 1, 2024 | [UAP] Jauhi Gratifikasi dalam Menyambut Hari Raya Idulfitri 1445 H<br>[UAP] Avoid Gratification in Welcoming Eid al-Fitr 1445 H |
| 4. | 29 April 2024<br>April 29, 2024 | [UAP] Perbedaan Gratifikasi dengan Hadiah<br>[UAP] Difference between Gratification and Gift |
| 5. | 30 Mei 2024<br>May 30, 2024 | [UAP] Praktik Penerapan Gratifikasi<br>[UAP] Practice of Gratification Implementation |
| 6. | 19 Juni 2024<br>June 19, 2024 | [UAP] Tolak Gratifikasi dengan PROVE IT<br>[UAP] Reject Gratification with PROVE IT |
| 7. | 07 Agustus 2024<br>August 7, 2024 | [UAP] Memberi Pelayanan Sepenuh Hati<br>[UAP] Providing Wholehearted Service |
| 8. | 27 Agustus 2024<br>August 27, 2024 | [UAP] Hati-Hati! Gratifikasi Akar dari Korupsi<br>[UAP] Beware! Gratification is the Root of Corruption |
| 9. | 17 September 2024<br>September 17, 2024 | [UAP] Hindari "5 *LOVE LANGUAGES*" yang Berujung Gratifikasi<br>[UAP] Avoid "5 LOVE LANGUAGES" that Lead to Gratification |
| 10. | 15 Oktober 2024<br>October 15, 2024 | [UAP] Perbedaan Gratifikasi, Pemerasan, dan Suap<br>[UAP] Differences between Gratification, Extortion and Bribery |
| 11. | 19 November 2024<br>November 19, 2024 | [UAP] Jangan Takut Laporkan Gratifikasi!<br>[UAP] Don't Be Afraid to Report Gratification! |
| 12. | 20 Desember 2024<br>December 20, 2024 | [UAP] Sambut Natal & Tahun Baru Tanpa Gratifikasi<br>[UAP] Welcome Christmas & New Year Without Gratification |



# RAPAT UMUM PEMEGANG SAHAM
## General Meeting of Shareholders

Rapat Umum Pemegang Saham (RUPS) merupakan sarana bagi Pemegang Saham untuk menggunakan hak yang dimilikinya dalam mengambil keputusan bersama mengenai Bank. Bagi Dewan Komisaris dan Direksi, RUPS berfungsi sebagai forum untuk menyampaikan laporan pertanggungjawaban atas pelaksanaan tugas serta hasil kinerja Bank kepada Pemegang Saham.

The General Meeting of Shareholders (GMS) is a means for Shareholders to exercise their rights in making joint decisions regarding the Bank. For the Board of Commissioners and Board of Directors, the GMS serves as a forum to submit accountability reports on the implementation of duties and the Bank's performance results to Shareholders.

## Landasan Hukum Pelaksanaan RUPS

Penyelenggaraan RUPS di Bank Sinarmas mengacu pada:

1. Anggaran Dasar;
2. Peraturan Otoritas Jasa Keuangan No. 15/POJK.04/2020 tentang Rencana dan Penyelenggaraan Rapat Umum Pemegang Saham Perusahaan Terbuka;
3. Undang-Undang No. 40 Tahun 2007 tentang Perseroan Terbatas; dan
4. POJK No. 16/POJK.04/2020 tentang Pelaksanaan Rapat Umum Pemegang Saham Perusahaan Terbuka secara Elektronik

## Mekanisme Pemungutan dan Penghitungan Suara

RUPS tahun 2024 dipimpin oleh Komisaris Utama yang ditunjuk oleh Dewan Komisaris berdasarkan keputusan Dewan Komisaris (berdasarkan Pasal 10 ayat (12) Anggaran Dasar Bank). Acara RUPS dimulai dengan pembacaan Tata Tertib RUPS dan menjadi bagian dalam Berita Acara RUPS.

Setelah semua pertanyaan ditanggapi, dilakukan pemungutan suara dengan mengisi surat suara yang telah dibagikan sebelum RUPS dimulai. Pemegang Saham atau kuasanya yang sah memiliki hak untuk memberikan suara dalam pengambilan keputusan. Notaris akan menghitung jumlah suara tidak setuju atau blanko, dan hasil penghitungan tersebut akan disampaikan kepada pimpinan rapat

## Perlakuan Adil terhadap Pemegang Saham

Pemegang Saham memiliki hak untuk berpartisipasi dalam pengambilan keputusan-keputusan terkait:

1. Perubahan Anggaran Dasar dan perubahan-perubahan mendasar lainnya mengenai Bank;
2. Hak untuk berpartisipasi secara efektif dan menggunakan suara dalam RUPS; serta
3. Hak untuk mendapatkan informasi mengenai RUPS termasuk mata acara/agenda, aturan, dan prosedur dalam pengambilan suara.

Bank Sinarmas melindungi dan memfasilitasi pelaksanaan hak-hak dasar Pemegang Saham, tanpa membedakan kepemilikan berdasarkan kelas saham, seperti:

1. Menghadiri dan memberikan 1 suara dalam RUPS;
2. Mendapatkan informasi yang relevan dan material secara tepat waktu;
3. Dapat memberikan kuasa kepada pihak lain apabila Pemegang Saham berhalangan hadir dalam RUPS;
4. Memperoleh materi RUPS sebelum RUPS dilaksanakan;
5. Dapat memberikan suara setuju, tidak setuju atau abstain pada setiap usulan putusan agenda RUPS; dan
6. Mendapat perlakuan yang sama dan setara dari Bank Sinarmas.

## Akses Informasi Pemegang Saham

Pemegang Saham dapat memperoleh informasi terkait Bank Sinarmas melalui berbagai media komunikasi, antara lain RUPS, paparan publik, media sosial, publikasi Laporan

## Legal Basis for the Implementation of the GMS

The implementation of the GMS at Bank Sinarmas refers to:

1. Articles of Association;
2. Financial Services Authority Regulation No. 15/POJK.04/2020 concerning the Plan and Implementation of General Meetings of Shareholders of Public Companies;
3. Law No. 40 of 2007 concerning Limited Liability Companies; and
4. POJK No. 16/POJK.04/2020 concerning the Implementation of the General Meeting of Shareholders of Public Companies Electronically.

## Voting and Counting Mechanism

The 2024 GMS is led by a member of the President Commissioners appointed by the Board of Commissioners based on a decision of the Board of Commissioners (based on Article 10, paragraph (12) of the Bank's Articles of Association). The GMS event begins with the reading of the GMS Procedure and becomes part of the GMS Minutes.

After all questions have been answered, voting is carried out by filling in the ballots that have been distributed before the GMS begins. Shareholders or their authorized proxies have the right to vote in decision-making. The notary will count the number of dissenting or blank votes, and the results of the calculation will be submitted to the meeting chair.

## Fair Treatment of Shareholders

Shareholders have the right to participate in decision-making related to:

1. Amendments to the Articles of Association and other fundamental changes regarding the Bank;
2. The right to participate effectively and use their votes in the GMS; and
3. The right to obtain information regarding the GMS, including the agenda, rules, and procedures for voting.

Bank Sinarmas protects and facilitates the implementation of the basic rights of Shareholders, without distinguishing ownership based on share class, such as:

1. Attending and casting 1 vote in the GMS;
2. Obtaining relevant and material information in a timely manner;
3. Being able to grant power of attorney to another party if the Shareholder is unable to attend the GMS;
4. Obtain GMS materials before the GMS is held;
5. Can vote in favor, disfavor, or abstain on every proposed decision on the GMS agenda; and
6. Receive the same and equal treatment from Bank Sinarmas.

## Shareholder Information Access

Shareholders can obtain information related to Bank Sinarmas through various communication media, including GMS, public exposure, social media, publication of Quarterly

Keuangan Per Kuartal, Laporan Tahunan, situs web (www. banksinarmas. com) serta akses email kepada *Corporate Secretary* (corporate.secretary@banksinarmas.com).

Financial Statements, Annual Reports, website (www. banksinarmas.com) and email access to the Corporate Secretary (corporate.secretary@banksinarmas.com).

## Pelaksanaan RUPS 2024

Pada tahun 2024, Bank telah melaksanakan RUPS Tahunan pada tanggal 16 Mei 2024, dan RUPS Luar Biasa pada tanggal 28 Oktober 2024 dengan rincian sebagai berikut.

## Implementation of 2024 GMS

### RUPS Tahunan
**Annual GMS**

| | |
|---|---|
| **Tanggal dan Waktu**<br>**Date and Time** | Kamis, 16 Mei 2024<br>10.40 WIB – 11.16 WIB<br>Thursday, May 16, 2024<br>10.40 WIB – 11.16 WIB |
| **Tempat**<br>**Place** | Ruang Danamas, Sinar Mas Land Plaza Tower II Lantai 39<br>Jalan MH Thamrin No. 51<br>Jakarta Pusat 10350<br>Danamas Room, Sinar Mas Land Plaza Tower II, 39th Floor<br>Jalan MH Thamrin No. 51<br>Jakarta Pusat, 10350 |
| **Pimpinan RUPS Tahunan**<br>**Chairman of the Annual General Meeting of Shareholders** | Tjendrawati Widjaja selaku Komisaris Utama<br>Tjendrawati Widjaja as the President Commissioner |
| **Kehadiran**<br>**Attendance** | **Dewan Komisaris** I **Board of Commissioners**<br>Tjendrawati Widjaja: Komisaris Utama I President Commissioner<br>Sammy Kristamuljana: Komisaris Independen I Independent Commissioner<br>Rusmin: Komisaris Independen I Independent Commissioner |
| | **Direksi** I **Board of Directors**<br>Frenky Tirtowijoyo: Direktur Utama I President Director<br>Miko Andidjaja: Direktur I Director<br>Enny Kamal: Direktur I Director<br>Sendy: Direktur I Director |
| | **Pemegang Saham** I **Shareholders**<br>15.656.126.639 saham (79,4076%) dari seluruh saham yang telah ditempatkan dan disetor penuh hingga saat Rapat yaitu sebanyak 19.716.162.403 saham<br>15,656,126,639 shares (79.4076%) of all shares that have been placed and fully paid up to the time of the Meeting, namely 19,716,162,403 shares |
| | **Pihak Independen Dalam Penghitungan Suara** I **Independent Parties in Vote Counting**<br>Aulia Taufani, SH, selaku Notaris dan PT Sinartama Gunita selaku Biro Administrasi Efek.<br>Aulia Taufani, SH, as Notary and PT Sinartama Gunita as Securities Administration Bureau. |

### Tahapan RUPS Tahunan
**Stages of the Annual General Meeting of Shareholders**

| Uraian Kegiatan<br>Description of Activities | Pelaksanaan<br>Implementation | Ketentuan<br>Provisions |
|---|---|---|
| Pemberitahuan RUPS Tahunan kepada Regulator<br>Notification of Annual General Meeting of Shareholders to Regulators | Pemberitahuan kepada Otoritas Jasa Keuangan tentang rencana dan mata acara Rapat pada tanggal 26 Maret 2024 dengan Surat SKL.060/2024/PRESDIR perihal Pemberitahuan Rencana Rapat Umum Pemegang Saham Tahunan ("RUPS Tahunan") PT. Bank Sinarmas Tbk. ("Bank").<br>Notification to the Financial Services Authority regarding the plan and agenda of the Meeting on March 26, 2024, with Letter SKL.060/2024/PRESDIR regarding Notification of the Plan for the Annual General Meeting of Shareholders ("AGMS") of PT. Bank Sinarmas Tbk. ("Bank"). | Perusahaan Terbuka wajib terlebih dahulu menyampaikan pemberitahuan mata acara rapat kepada Otoritas Jasa Keuangan paling lambat 5 hari kerja sebelum pengumuman RUPS, dengan tidak memperhitungkan tanggal pengumuman RUPS.<br>Public Companies are required to first submit notification of the meeting agenda to the Financial Services Authority no later than 5 working days before the announcement of the GMS, without taking into account the GMS announcement date. |

| Uraian Kegiatan<br>Description of Activities | Pelaksanaan<br>Implementation | Ketentuan<br>Provisions |
|---|---|---|
| Pengumuman RUPS Tahunan<br>Announcement of Annual General Meeting of Shareholders | • Diumumkan melalui surat kabar Investor Daily Indonesia pada tanggal 4 April 2024;<br>• Bukti iklan disampaikan kepada Otoritas Jasa Keuangan (*hardcopy* dan *e-reporting* melalui Sistem Pelaporan Elektronik Otoritas Jasa Keuangan(SPE OJK)) dan Bursa Efek Indonesia (*e-reporting* melalui IDXNet) pada tanggal 4 April 2024;<br>• Diunggah pada situs web Bank (www. banksinarmas.com) di hari yang sama; dan Diunggah pada situs web bursa (www.idx.co.id) dan situs web Kustodian Sentral Efek Indonesia (KSEI) (www.ksei.co.id).<br>• Announced through the Investor Daily Indonesia newspaper on April 4, 2024;<br>• Proof of advertisement submitted to the Financial Services Authority (hard copy and e-reporting through the Financial Services Authority Electronic Reporting System (SPE OJK)) and the Indonesia Stock Exchange (e-reporting through IDXNet) on April 4, 2024;<br>• Uploaded on the Bank's website (www.banksinarmas.com) on the same day; and Uploaded on the stock exchange website (www.idx.co.id) and the Indonesian Central Securities Depository (KSEI) website (www.ksei.co.id). | Perusahaan Terbuka wajib melakukan pengumuman RUPS kepada Pemegang Saham paling lambat 14 hari sebelum pemanggilan RUPS, dengan tidak memperhitungkan tanggal pengumuman dan tanggal pemanggilan.<br>Public Companies are required to announce the GMS to Shareholders no later than 14 days before the GMS summon, excluding the announcement date and the summon date. |
| Pemanggilan serta Penjelasan Mata Acara<br>Summons and Explanation of Agenda Items | • Diumumkan melalui surat kabar Investor Daily Indonesia pada tanggal 24 April 2024;<br>• Bukti iklan disampaikan kepada Otoritas Jasa Keuangan (hardcopy dan e-reporting melalui SPE OJK) dan Bursa Efek Indonesia (e-reporting melalui IDXNet) pada tanggal 24 April 2024;<br>• Diunggah pada situs web Bank (www. banksinarmas.com) di hari yang sama; dan<br>• Diunggah pada situs web bursa (www.idx.co.id) dan situs web KSEI (www.ksei.co.id).<br>• Announced through the Investor Daily Indonesia newspaper on April 24, 2024;<br>• Proof of advertisement submitted to the Financial Services Authority (hard copy and e-reporting through SPE OJK) and the Indonesia Stock Exchange (e-reporting through IDXNet) on April 24, 2024;<br>• Uploaded on the Bank's website (www.banksinarmas.com) on the same day; and<br>• Uploaded on the stock exchange website, (www.idx.co.id), and the KSEI website, (www.ksei.co.id). | Perusahaan Terbuka wajib melakukan pemanggilan kepada Pemegang Saham paling lambat 21 hari sebelum tanggal penyelenggaraan RUPS, dengan tidak memperhitungkan tanggal pemanggilan dan tanggal penyelenggaraan RUPS.<br>Public Companies are required to issue a summons to Shareholders no later than 21 days before the date of the GMS, excluding the date of the summons and the date of the GMS. |
| Ringkasan Risalah (Hasil) RUPS Tahunan<br>Summary of Minutes (Results) of the Annual General Meeting of Shareholders | • Dipublikasikan pada tanggal 17 Mei 2024 melalui surat kabar harian Investor Daily Indonesia;<br>• Bukti iklan disampaikan kepada Otoritas Jasa Keuangan (*hardcopy* dan *e-reporting* melalui SPE OJK) dan Bursa Efek Indonesia (*e-reporting* melalui IDXNet) serta dipublikasikan melalui surat kabar harian Investor Daily Indonesia pada tanggal 17 Mei 2024;<br>• Diunggah pada situs web Bank www.banksinarmas.com pada tanggal 17 Mei 2024; dan<br>• Diunggah pada situs web bursa www.idx.co.id dan situs web KSEI www.ksei.co.id melalui surat kabar harian Investor Daily Indonesia.<br>• Published on May 17, 2024, through the Investor Daily Indonesia Newspaper;<br>• Proof of advertisement submitted to the Financial Services Authority (hard copy and e-reporting through SPE OJK) and the Indonesia Stock Exchange (e-reporting through IDXNet) and published through the Investor Daily Indonesia Newspaper on May 17, 2024;<br>• Uploaded on the Bank's website, www.banksinarmas.com, on May 17, 2024; and<br>• Uploaded on the stock exchange website, www.idx.co.id, and the KSEI website, www.ksei.co.id, and through the Investor Daily Indonesia Newspaper. | Ringkasan risalah RUPS wajib diumumkan kepada masyarakat paling lambat 2 hari kerja setelah RUPS diselenggarakan.<br>The summary of the minutes of the GMS must be announced to the public no later than 2 working days after the GMS is held. |

## Keputusan dan Realisasi RUPS Tahunan
### Resolutions and Realization of the Annual GMS

| Mata Acara 1<br>Agenda – Item 1 | |
|---|---|
| **Agenda** | **Keputusan**<br>**Resolution** |
| Persetujuan Laporan Tahunan Direksi untuk tahun buku yang berakhir pada tanggal 31 Desember 2023.<br>Approval of the Board of Directors' Annual Report for the financial year ending December 31, 2023. | Menerima dan Menyetujui Laporan Tahunan Direksi untuk tahun buku yang berakhir pada tanggal 31 Desember 2023.<br>Accepting and Approving the Annual Report of the Board of Directors for the financial year ending December 31, 2023. |

| Hasil Pemungutan Suara<br>Voting Results | Realisasi/Tindak Lanjut<br>Realization/Follow-up |
|---|---|
| Setuju: 15.656.126.639 saham<br>Tidak Setuju: -<br>Abstain: -<br>Tidak Menentukan: -<br>Agree: 15,656,126,639 shares<br>Disagree: -<br>Abstain: -<br>Did Not Determined: - | Telah direalisasikan pada tahun 2024.<br>It has been realized in 2024. |

**Mata Acara 2**
Agenda – Item 2

| Agenda | Keputusan<br>Resolution |
|---|---|
| Pengesahan Perhitungan Tahunan (Neraca dan Perhitungan Rugi/Laba) untuk tahun buku yang berakhir pada tanggal 31 Desember 2023 serta memberikan pembebasan tanggung jawab kepada para anggota Direksi dan Dewan Komisaris atas pengurusan dan pengawasan (*acquit et de charge*) yang telah dijalankan untuk tahun buku yang berakhir pada tanggal 31 Desember 2023.<br>Ratification of the Annual Calculation (Balance Sheet and Profit/Loss Calculation) for the financial year ending on December 31, 2023, and granting release of responsibility to the members of the Board of Directors and Board of Commissioners for the management and supervision (acquit et de charge) that have been carried out for the financial year ending on December 31, 2023. | Pengesahan Perhitungan Tahunan (Neraca dan Perhitungan Rugi/Laba) untuk tahun buku yang berakhir pada tanggal 31 Desember 2023 serta memberikan pembebasan dan pelunasan tanggung jawab (*acquit et de charge*) kepada para anggota Direksi atas tindakan pengurusan dan Dewan Komisaris atas tindakan pengawasan yang telah dijalankan untuk tahun buku yang berakhir pada tanggal 31 Desember 2023.<br>Ratification of the Annual Calculation (Balance Sheet and Profit/Loss Calculation) for the financial year ending on December 31, 2023, and granting release and discharge of responsibility (acquit et de charge) to the members of the Board of Directors for management actions and the Board of Commissioners for supervisory actions that have been carried out for the financial year ending on December 31, 2023. |

| Hasil Pemungutan Suara<br>Voting Results | Realisasi/Tindak Lanjut<br>Realization/Follow-up |
|---|---|
| Setuju: 15.656.126.639 saham<br>Tidak Setuju: -<br>Abstain: -<br>Tidak Menentukan: -<br>Agree: 15,656,126,639 shares<br>Disagree: -<br>Abstain: -<br>Not Determined: - | Telah direalisasikan pada tahun 2024.<br>It has been realized in 2024. |

**Mata Acara 3**
Agenda – Item 3

| Agenda | Keputusan<br>Resolutions |
|---|---|
| Persetujuan penggunaan laba Perseroan untuk tahun buku yang berakhir pada tanggal 31 Desember 2023.<br>Approval of the use of the Company's profits for the financial year ending December 31, 2023. | 1. Menyetujui penggunaan laba Perseroan untuk tahun buku yang berakhir pada tanggal 31 Desember 2023 sebesar Rp75.797.080.615,00 yang akan digunakan sebesar Rp500.000.000,00 (lima ratus juta Rupiah) untuk dana cadangan sesuai dengan ketentuan pasal 70 Undang-undang No. 40 Tahun 2007 dan pasal 23 anggaran dasar Perseroan.<br>2. Menyetujui sisa laba bersih Perseroan sebesar Rp75.297.080.615,00 akan dipergunakan untuk memperkuat Permodalan Perseroan dan dicatat sebagai Laba Yang Ditahan, sesuai dengan pasal 23 ayat 3 anggaran dasar Perseroan akan dikelola oleh Direksi dengan cara yang tepat menurut pertimbangan Direksi, setelah memperoleh persetujuan Dewan Komisaris.<br>3. Memberikan wewenang kepada Direksi Perseroan untuk mengatur, melaksanakan, dan menjalankan tindakan-tindakan yang diperlukan sehubungan dengan penggunaan laba bersih Perseroan tersebut diatas sesuai dengan ketentuan hukum dan peraturan yang berlaku.<br>1. Approving the use of the Company's profit for the financial year ending on December 31, 2023, amounting to Rp 75,797,080,615.00, which will be used in the amount of Rp Rp 500,000,000.00 (five hundred million Rupiah) for reserve funds in accordance with the provisions of Article 70 of Law No. 40 of 2007 and Article 23 of the Company's articles of association.<br>2. Approving the remaining net profit of the Company of Rp 75,297,080,615.00 will be used to strengthen the Company's Capital and recorded as Retained Earnings, in accordance with Article 23 paragraph 3 of the Company's articles of association, will be managed by the Board of Directors in an appropriate manner according to the Board of Directors' considerations, after obtaining approval from the Board of Commissioners.<br>3. Delegating authority to the Company's Board of Directors to regulate, implement, and carry out the necessary actions in connection with the use of the Company's net profit above in accordance with the provisions of applicable laws and regulations. |

**Hasil Pemungutan Suara**
**Voting Results**

Setuju: 15.656.126.639 saham
Tidak Setuju: -
Abstain: -
Tidak Menentukan: -
Agree: 15,656,126,639 shares
Disagree: -
Abstain: -
Did Not Determined: -

**Realisasi/Tindak Lanjut**
**Realization/Follow-up**

Telah direalisasikan pada tahun 2024.
It has been realized in 2024.

**Mata Acara 4**
**Agenda – Item 4**

**Agenda**

Penunjukan Akuntan Publik dan Kantor Akuntan Publik untuk melakukan pemeriksaan (audit) pembukuan tahun 2024.
Appointment of Public Accountant and Public Accounting Firm to conduct audit of the 2024 financial statements

**Keputusan**
**Resolutions**

1. Menyetujui penunjukan Akuntan Publik DENNY SUSANTO dan Kantor Akuntan Publik MIRAWATI SENSI IDRIS (firma anggota Moore Global) yang masing-masing terdaftar di Otoritas Jasa Keuangan sebagai Akuntan Publik dan Kantor Akuntan Publik, atau Akuntan Publik lain dalam Kantor Akuntan Publik yang sama, dalam hal yang bersangkutan berhalangan tetap untuk melakukan audit Laporan Keuangan Konsolidasian Perseroan Tahun Buku 2024.
2. Menyetujui pelimpahan kewenangan kepada Dewan Komisaris Perseroan untuk menunjuk Akuntan Publik dan Kantor Akuntan Publik lain, dalam hal Akuntan Publik dan/atau Kantor Akuntan Publik yang ditunjuk tidak dapat menyelesaikan pemberian jasa audit atau berhalangan tetap untuk melakukan audit Laporan Keuangan Konsolidasian Perseroan Tahun Buku 2024.
3. Menyetujui pemberian kuasa kepada Direksi perseroan untuk menetapkan honorarium bagi Kantor Akuntan Publik tersebut dan melaksanakan hal-hal yang dipandang perlu sehubungan dengan penunjukan Akuntan Publik dan Kantor Akuntan Publik, termasuk akan tetapi tidak terbatas, pada proses pelaksanaan rapat dan penandatanganan surat penunjukan bagi Akuntan Publik dan Kantor Akuntan Publik.

1. Approving the appointment of Public Accountant DENNY SUSANTO and Public Accounting Firm MIRAWATI SENSI IDRIS (member firms of Moore Global), which are each registered with the Financial Services Authority as Public Accountants and Public Accounting Firms, or other Public Accountants in the same Public Accounting Firm, in the event that the person concerned is permanently prevented from auditing the Company's Consolidated Financial Statements for the 2024 Financial Year.
2. Approving the delegation of authority to the Company's Board of Commissioners to appoint other Public Accountants and Public Accounting Firms, in the event that the appointed Public Accountant and/or Public Accounting Firm is unable to complete the provision of audit services or is permanently prevented from auditing the Company's Consolidated Financial Statements for the 2024 Financial Year.
3. Approving the granting of power of attorney to the Company's Board of Directors to determine the honorarium for the Public Accounting Firm and to carry out matters deemed necessary in connection with the appointment of the Public Accountant and Public Accounting Firm, including but not limited to the process of holding meetings and signing the letter of appointment for the Public Accountant and Public Accounting Firm.

**Hasil Pemungutan Suara**
**Voting Results**

Setuju: 15.656.126.639 saham
Tidak Setuju: -
Abstain: -
Tidak Menentukan: -
Agree: 15,656,126,639 shares
Disagree: -
Abstain: -
Not Determined: -

**Realisasi/Tindak Lanjut**
**Realization/Follow-up**

Telah direalisasikan pada tahun 2024.
It has been realized in 2024

Akuntan Publik Denny Susanto dari Kantor Akuntan Publik Mirawati Sensi Idris telah selesai mengaudit Laporan Keuangan PT. Bank Sinarmas Tbk. periode 31 Desember 2024 pada tanggal 26 Maret 2025 dengan opini Wajar Tanpa Modifikasian.
Public Accountant Denny Susanto from Mirawati Sensi Idris Public Accounting Firm has completed auditing the Financial Statements of PT. Bank Sinarmas Tbk. for the period of December 31, 2024, on March 26, 2025 with an Unqualified Opinion.

| Mata Acara 5<br>Agenda – Item 5 | |
|---|---|
| **Agenda** | **Keputusan**<br>**Resolutions** |
| Penetapan Gaji para anggota Direksi serta Honorarium Dewan Komisaris Perseroan tahun 2024.<br>Determination of the Salaries of the Board of Directors and the Honorarium of the Company's Board of Commissioners in 2024. | 1. Menetapkan besaran honorarium dan/atau tunjangan lainnya dari Dewan Komisaris Perseroan dengan besaran minimal sama dengan tahun 2023 dan maksimal peningkatan 20% dari tahun 2023.<br>2. Memberikan wewenang kepada Dewan Komisaris Perseroan untuk menetapkan gaji dan tunjangan anggota Direksi Perseroan dengan memperhatikan usul dari Komite Remunerasi dan Nominasi Perseroan.<br>1. Determining the amount of honorarium and/or other allowances for the Company's Board of Commissioners with a minimum amount equal to 2023 and a maximum increase of 20% from 2023.<br>2. Delegating authority to the Company's Board of Commissioners to determine the salary and allowances of members of the Company's Board of Directors by taking into account the proposals from the Company's Remuneration and Nomination Committee. |
| **Hasil Pemungutan Suara**<br>**Voting Results** | **Realisasi/Tindak Lanjut**<br>**Realization/Follow-up** |
| Setuju: 15.656.126.639 saham<br>Tidak Setuju: -<br>Abstain: -<br>Tidak Menentukan: -<br>Agree: 15,656,126,639 shares<br>Disagree: -<br>Abstain: -<br>Did Not Determined: - | Telah direalisasikan pada tahun 2024.<br>It has been realized in 2024. |

| Mata Acara 6<br>Agenda – Item 6 | |
|---|---|
| **Agenda** | **Keputusan**<br>**Resolutions** |
| Persetujuan Perubahan Anggaran Dasar Perseroan.<br>Approval of Amendments to the Company's Articles of Association. | 1. Menyetujui perubahan Anggaran Dasar Perseroan, yaitu beberapa ketentuan dalam Pasal 14, 15, 17, 18 dan 19 dalam kaitannya dengan penyesuaian Peraturan OJK No.17 Tahun 2023 tentang Penerapan Tata Kelola Bagi Bank Umum dan sebagaimana rincian perubahan Anggaran Dasar Perseroan yang telah secara lengkap disajikan dalam Rapat.<br>2. Memberikan kuasa kepada Direksi Perseroan dan/atau *Corporate Secretary* Perseroan dengan hak substitusi untuk melakukan segala tindakan yang diperlukan berkaitan dengan keputusan Mata Acara Rapat, termasuk namun tidak terbatas untuk menyusun dan menyatakan kembali seluruh Anggaran Dasar Perseroan dalam suatu Akta Notaris termasuk perbaikan dan/atau perubahan apabila disyaratkan, dan untuk memberitahukan atas perubahan Anggaran Dasar Perseroan tersebut kepada Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dan instansi-instansi terkait, dan untuk melaksanakan tindakan lainnya yang mungkin diperlukan tanpa ada yang dikecualikan.<br>1. Approving the amendments to the Company's Articles of Association, namely several provisions in Articles 14, 15, 17, 18, and 19 in relation to the adjustment of OJK Regulation No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks and as detailed changes to the Company's Articles of Association that have been fully presented in the Meeting.<br>2. Delegating power to the Company's Board of Directors and/or the Company's Corporate Secretary with the right of substitution to take all necessary actions related to the resolutions of the Meeting Agenda, including but not limited to compiling and restating the entire Company's Articles of Association in a Notarial Deed, including improvements and/or changes if required, and to notify the Minister of Law and Human Rights of the Republic of Indonesia and related agencies of the changes to the Company's Articles of Association, and to carry out other actions that may be required without exception. |
| **Hasil Pemungutan Suara**<br>**Voting Results** | **Realisasi/Tindak Lanjut**<br>**Realization/Follow-up** |
| Setuju: 15.656.126.639 saham<br>Tidak Setuju: -<br>Abstain: -<br>Tidak Menentukan: -<br>Agree: 15,656,126,639 shares<br>Disagree: -<br>Abstain: -<br>Did Not Determined: - | Telah direalisasikan pada tahun 2024.<br>It has been realized in 2024 |

## RUPS Luar Biasa
### Extraordinary GMS

| | |
|---|---|
| **Tanggal dan Waktu**<br>**Date and Time** | Senin, 28 Oktober 2024<br>10.46 WIB – 11.00 WIB<br>Monday, October 28, 2024<br>10.46 WIB – 11.00 WIB |
| **Tempat**<br>**Place** | Ruang Danamas, Sinar Mas Land Plaza Tower II Lantai 39<br>Jalan MH Thamrin No. 51<br>Jakarta Pusat 10350<br>Danamas Room, Sinar Mas Land Plaza Tower II, 39th Floor<br>Jalan MH Thamrin No. 51<br>Jakarta Pusat, 10350 |
| **Pimpinan RUPS Tahunan**<br>**Chairman of the Annual General Meeting of Shareholders** | Tjendrawati Widjaja selaku Komisaris Utama<br>Tjendrawati Widjaja as the President Commissioner |
| **Kehadiran**<br>**Attendance** | **Dewan Komisaris** \| **Board of Commissioners**<br>Tjendrawati Widjaja: Komisaris Utama \| President Commissioner<br>Sammy Kristamuljana: Komisaris Independen \| Independent Commissioner<br><br>**Direksi** \| **Board of Directors**<br>Frenky Tirtowijoyo: Direktur Utama \| President Director<br>Miko Andidjaja: Direktur \| Director<br>Ekajaya Ongny Putra: Direksi \| Director<br>Enny Kamal: Direktur \| Director<br>Sendy: Direktur \| Director<br><br>**Pemegang Saham** \| **Shareholders**<br>15.819.156.029 saham (80,2345%) dari seluruh saham yang telah ditempatkan dan disetor penuh hingga saat Rapat yaitu sebanyak 19.716.162.403 saham.<br>15,819,156,029 shares (80.2345%) of all shares that have been placed and fully paid up to the time of the Meeting, namely 19,716,162,403 shares.<br><br>**Pihak Independen Dalam Penghitungan Suara** \| **Independent Parties in Vote Counting**<br>Aulia Taufani, SH, selaku Notaris dan PT Sinartama Gunita selaku Biro Administrasi Efek.<br>Aulia Taufani, SH, as Notary and PT Sinartama Gunita as Securities Administration Bureau. |

## Tahapan RUPS Luar Biasa
### Stages of the Extraordinary GMS

| Uraian Kegiatan<br>Description of Activities | Pelaksanaan<br>Implementation | Ketentuan<br>Provisions |
|---|---|---|
| Pemberitahuan RUPS Luar Biasa kepada Regulator<br>Notification of Extraordinary GMS to Regulators | Menyampaikan pemberitahuan tentang rencana Mata Acara Rapat kepada Otoritas Jasa Keuangan (OJK), melalui surat tanggal 3 September 2024 No. SKL.189/2024/PRESDIR.<br>Submitting notification regarding the planned Meeting Agenda to the Financial Services Authority (OJK), via letter dated September 3, 2024 No. SKL.189/2024/PRESDIR. | Perusahaan Terbuka wajib terlebih dahulu menyampaikan pemberitahuan mata acara rapat kepada Otoritas Jasa Keuangan paling lambat 5 hari kerja sebelum pengumuman RUPS, dengan tidak memperhitungkan tanggal pengumuman RUPS.<br>Public Companies are required to first submit notification of the meeting agenda to the Financial Services Authority no later than 5 working days before the announcement of the GMS, without taking into account the GMS announcement date. |
| Pengumuman RUPS Luar Biasa<br>Announcement of Extraordinary GMS | • Diumumkan melalui surat kabar Investor Daily Indonesia pada tanggal 19 September 2024;<br>• Bukti iklan disampaikan kepada Otoritas Jasa Keuangan (*hardcopy* dan *e-reporting* melalui Sistem Pelaporan Elektronik Otoritas Jasa Keuangan(SPE OJK)) dan Bursa Efek Indonesia (*e-reporting* melalui IDXNet) pada tanggal 19 September 2024;<br>• Diunggah pada situs web Bank (www. banksinarmas.com) di hari yang sama; dan<br>• Diunggah pada situs web bursa (www.idx.co.id) dan situs web Kustodian Sentral Efek Indonesia (KSEI) (www.ksei.co.id).<br>• Announced through the Investor Daily Indonesia newspaper on September 19, 2024;<br>• Proof of advertisement submitted to the Financial Services Authority (hard copy and e-reporting through the Financial Services Authority Electronic Reporting System (SPE OJK)) and the Indonesia Stock Exchange (e-reporting through IDXNet) on September 19, 2024;<br>• Uploaded on the Bank's website (www.banksinarmas.com) on the same day; and uploaded on the stock exchange website (www.idx.co.id) and the Indonesian Central Securities Depository (KSEI) website (www.ksei.co.id). | Perusahaan Terbuka wajib melakukan pengumuman RUPS kepada Pemegang Saham paling lambat 14 hari sebelum pemanggilan RUPS, dengan tidak memperhitungkan tanggal pengumuman dan tanggal pemanggilan. |

| Uraian Kegiatan<br>Description of Activities | Pelaksanaan<br>Implementation | Ketentuan<br>Provisions |
|---|---|---|
| Pemanggilan serta Penjelasan Mata Acara<br>Summons and Explanation of Agenda Items | • Diumumkan melalui surat kabar Investor Daily Indonesia pada tanggal 4 Oktober 2024;<br>• Bukti iklan disampaikan kepada Otoritas Jasa Keuangan (*hardcopy* dan *e-reporting* melalui SPE OJK) dan Bursa Efek Indonesia (*e-reporting* melalui IDXNet) pada tanggal 4 Oktober 2024;<br>• Diunggah pada situs web Bank (www. banksinarmas.com) di hari yang sama; dan diunggah pada situs web bursa (www.idx.co.id) dan situs web KSEI (www.ksei.co.id).<br>• Announced through the Investor Daily Indonesia newspaper on October 4, 2024;<br>• Proof of advertisement submitted to the Financial Services Authority (hard copy and e-reporting through SPE OJK) and the Indonesia Stock Exchange (e-reporting through IDXNet) on October 4, 2024;<br>• Uploaded on the Bank's website (www.banksinarmas.com) on the same day; and uploaded on the stock exchange website (www.idx.co.id) and the KSEI website (www.ksei.co.id). | Perusahaan Terbuka wajib melakukan pemanggilan kepada Pemegang Saham paling lambat 21 hari sebelum tanggal penyelenggaraan RUPS, dengan tidak memperhitungkan tanggal pemanggilan dan tanggal penyelenggaraan RUPS.<br>Public Companies are required to issue a summons to Shareholders no later than 21 days before the date of the GMS, excluding the date of the summons and the date of the GMS |
| Ringkasan Risalah (Hasil) RUPS Luar Biasa<br>Summary of Minutes (Results) of Extraordinary GMS | • Dipublikasikan pada tanggal 29 Oktober 2024 melalui surat kabar harian Investor Daily Indonesia;<br>• Bukti iklan disampaikan kepada Otoritas Jasa Keuangan (*hardcopy* dan *e-reporting* melalui SPE OJK) dan Bursa Efek Indonesia (*e-reporting* melalui IDXNet) serta dipublikasikan melalui surat kabar harian Investor Daily Indonesia pada tanggal 29 Oktober 2024;<br>• Diunggah pada situs web Bank www.banksinarmas.com pada tanggal 29 Oktober 2024; dan<br>• Diunggah pada situs web bursa www.idx.co.id dan situs web KSEI www.ksei.co.id melalui surat kabar harian Investor Daily Indonesia.<br>• Published on October 29, 2024, through the Investor Daily Indonesia Newspaper;<br>• Proof of advertisement submitted to the Financial Services Authority (hard copy and e-reporting through SPE OJK) and the Indonesia Stock Exchange (e-reporting through IDXNet) and published through the Investor Daily Indonesia Newspaper on October 29, 2024;<br>• Uploaded on the Bank's website www.banksinarmas.com on October 29, 2024; and<br>• Uploaded on the stock exchange website www.idx.co.id and the KSEI website www.ksei.co.id and through the Investor Daily Indonesia Newspaper. | Ringkasan risalah RUPS wajib diumumkan kepada masyarakat paling lambat 2 hari kerja setelah RUPS diselenggarakan.<br>The summary of the minutes of the GMS must be announced to the public no later than 2 working days after the GMS is held. |

## Keputusan dan Realisasi RUPS Luar Biasa
### Resolution and Realization of Extraordinary GMS

| Mata Acara 1<br>Agenda – Item 1 | |
|---|---|
| **Agenda** | **Keputusan**<br>Resolutions |
| Susunan Pengurus Perseroan.<br>Composition of the Company›s Management. | 1. Menyetujui pengangkatan Sdri. Amandalia Johanes sebagai Direktur Perseroan untuk masa jabatan terhitung sejak ditutupnya rapat ini sampai dengan berakhirnya masa jabatan Direksi Perseroan yang saat ini menjabat yaitu pada saat penutupan Rapat Umum Pemegang Saham Tahunan yang akan diselenggarakan pada tahun 2026.<br><br>Dengan demikian sejak ditutupnya Rapat, susunan anggota Direksi dan Dewan Komisaris Perseroan adalah sebagai berikut:<br>**DIREKSI:**<br>Direktur Utama: Frenky Tirtowijoyo<br>Direktur: Miko Andidjaja<br>Direktur: Ekajaya Ongny Putra<br>Direktur: Enny Kamal<br>Direktur: Sendy<br>Direktur: Amandalia Johanes<br>**DEWAN KOMISARIS:**<br>Komisaris Utam : Tjendrawati Widjaja<br>Komisaris Independen: Sammy Kristamuljana<br>Komisaris Independen: Rusmin<br>2. Menunjuk dan memberi kuasa kepada Direksi dan/atau *Corporate Secretary* Perseroan untuk melaksanakan keputusan tersebut di atas termasuk tetapi tidak terbatas untuk menandatangani akta pernyataan keputusan rapat di hadapan Notaris dan memberitahukan perubahan tersebut kepada pihak/instansi yang berwenang. |

1. Approving the appointment of Ms. Amandalia Johanes as Director of the Company for a term of office starting from the closing of this meeting until the end of the term of office of the Company›s current Board of Directors, namely at the closing of the Annual General Meeting of Shareholders to be held in 2026.
   Therefore, since the closing of the Meeting, the composition of the members of the Board of Directors and Board of Commissioners of the Company is as follows:
   **BOARD OF DIRECTORS:**
   President Director: Frenky Tirtowijoyo
   Director: Miko Andidjaja
   Director: Ekajaya Ongny Putra
   Director: Enny Kamal
   Director: Sendy
   Director: Amandalia Johanes
   **BOARD OF COMMISSIONERS:**
   President Commissioner: Tjendrawati Widjaja
   Independent Commissioner: Sammy Kristamuljana
   Independent Commissioner: Rusmin
2. Appointing and authorizing the Board of Directors and/or Corporate Secretary of the Company to implement the above resolutions, including but not limited to signing the deed of statement of meeting resolutions in the presence of a Notary and notifying the changes to the authorized parties/agencies.

| Hasil Pemungutan Suara<br>Voting Results | Realisasi/Tindak Lanjut<br>Realization/Follow-up |
|---|---|
| Setuju: 15.819.156.029 saham<br>Tidak Setuju: -<br>Abstain: -<br>Tidak Menentukan: -<br>Agree: 15,819,156,029 shares<br>Disagree: -<br>Abstain: -<br>Did Not Determined: - | Telah direalisasikan pada tahun 2024.<br>It has been realized in 2024 |

## Keputusan dan Realisasi atas Keputusan RUPS Tahun Sebelumnya

In 2024, the Bank implemented an Annual GMS on May 16, 2024, and an Extraordinary GMS on October 28, 2024, with the following details.

## Resolution and Realization of the Previous Year's GMS

### RUPS Tahunan 27 Juni 2023
**Annual GMS June 27, 2023**

| Mata Acara 1<br>Agenda – Item 1 | |
|---|---|
| **Agenda** | **Keputusan**<br>Resolutions |
| Persetujuan Laporan Tahunan Direksi untuk tahun buku yang berakhir pada tanggal 31 Desember 2022.<br>Approval of the Board of Directors' Annual Report for the financial year ending December 31, 2022. | Menerima dan menyetujui Laporan Tahunan Direksi untuk tahun buku yang berakhir pada 31 Desember 2022.<br>Accepting and approving the Annual Report of the Board of Directors for the financial year ending December 31, 2022. |
| **Hasil Pemungutan Suara**<br>Voting Results | **Realisasi/Tindak Lanjut**<br>Realization/Follow-up |
| Setuju: 15.475.512.963 saham<br>Tidak Setuju: -<br>Abstain: -<br>Tidak Menentukan: -<br>Agree: 15,475,512,963 shares<br>Disagree: -<br>Abstain: -<br>Did Not Determined: - | Telah direalisasikan pada tahun 2023.<br>It has been realized in 2023 |

| Mata Acara 2<br>Agenda – Item 2 | |
|---|---|
| **Agenda** | **Keputusan**<br>Resolutions |
| Pengesahan Perhitungan Tahunan (Neraca dan Perhitungan Rugi/Laba) untuk tahun buku yang berakhir pada tanggal 31 Desember 2022 serta memberikan pembebasan tanggung jawab kepada para anggota Direksi dan Dewan Komisaris atas pengurusan dan pengawasan (*acquit et de charge*) yang telah dijalankan untuk tahun buku yang berakhir pada tanggal 31 Desember 2022.<br>Approval of the Annual Calculation (Balance Sheet and Profit/Loss Calculation) for the financial year ending on December 31, 2022, and granting release of responsibility to the members of the Board of Directors and Board of Commissioners for the management and supervision (acquit et de charge) that have been carried out for the financial year ending on December 31, 2022. | Pengesahan Perhitungan Tahunan (Neraca dan Perhitungan Rugi/Laba) untuk tahun buku yang berakhir pada tanggal 31 Desember 2022 serta memberikan pembebasan dan pelunasan tanggung jawab (*acquit et de charge*) kepada para anggota Direksi atas tindakan pengurusan dan Dewan Komisaris atas tindakan pengawasan yang telah dijalankan untuk tahun buku yang berakhir pada tanggal 31 Desember 2022.<br>Ratification of the Annual Calculation (Balance Sheet and Profit/Loss Calculation) for the financial year ending on December 31, 2022, and granting release and discharge of responsibility (acquit et de charge) to the members of the Board of Directors for management actions and the Board of Commissioners for supervisory actions that have been carried out for the financial year ending on December 31, 2022. |
| **Hasil Pemungutan Suara**<br>Voting Results | **Realisasi/Tindak Lanjut**<br>Realization/Follow-up |
| Setuju: 15.475.512.963 saham<br>Tidak Setuju: -<br>Abstain: -<br>Tidak Menentukan: -<br>Agree: 15,475,512,963 shares<br>Disagree: -<br>Abstain: -<br>Did Not Determined: - | Telah direalisasikan pada tahun 2023.<br>It has been realized in 2023 |

| Mata Acara 3<br>Agenda – Item 3 | |
|---|---|
| **Agenda** | **Keputusan**<br>Resolutions |
| Persetujuan penggunaan laba Bank untuk tahun buku yang berakhir pada tanggal 31 Desember 2022.<br>Approval of the use of Bank profits for the financial year ending December 31, 2022. | 1. Menyetujui penggunaan laba Bank untuk tahun buku yang berakhir pada tanggal 31 Desember 2022 sebesar Rp221.160.347.699,- yang akan digunakan sebesar Rp500.000.000,- untuk dana cadangan sesuai dengan ketentuan pasal 70 Undang-undang No. 40 tahun 2007 dan Pasal 23 Anggaran Dasar Bank.<br>2. Menyetujui sisa laba bersih Bank sebesar Rp220.660.347.699,- akan dipergunakan untuk memperkuat permodalan Bank dan dicatat sebagai laba yang ditahan, sesuai dengan Pasal 23 Ayat 3 Anggaran Dasar Bank akan dikelola oleh Direksi dengan cara yang tepat menurut pertimbangan Direksi, setelah memperoleh persetujuan Dewan Komisaris.<br>3. Memberikan wewenang kepada Direksi Bank untuk mengatur, melaksanakan, dan menjalankan tindakan-tindakan yang diperlukan sehubungan dengan penggunaan laba bersih Bank tersebut di atas sesuai dengan ketentuan hukum dan peraturan yang berlaku.<br>1. Approving the use of the Bank's profit for the financial year ending on December 31, 2022, amounting to Rp 221,160,347,699,-, which will be used for Rp 500,000,000 for reserve funds in accordance with the provisions of Article 70 of Law No. 40 of 2007 and Article 23 of the Bank's Articles of Association.<br>2. Approving the remaining net profit of the Bank of Rp 220,660,347,699,- will be used to strengthen the Bank's capital and recorded as retained earnings, in accordance with Article 23 Paragraph 3 of the Bank's Articles of Association, will be managed by the Board of Directors in an appropriate manner according to the Board of Directors' considerations, after obtaining approval from the Board of Commissioners.<br>3. Delegating authority to the Bank's Board of Directors to regulate, implement, and carry out the necessary actions in connection with the use of the Bank's net profit above in accordance with the provisions of applicable laws and regulations. |
| **Hasil Pemungutan Suara**<br>Voting Results | **Realisasi/Tindak Lanjut**<br>Realization/Follow-up |
| Setuju: 15.475.512.963 saham<br>Tidak Setuju: -<br>Abstain: -<br>Tidak Menentukan: -<br>Agree: 15,475,512,963 shares<br>Disagree: -<br>Abstain: -<br>Did Not Determined: - | Telah direalisasikan pada tahun 2023.<br>It has been realized in 2023 |

| Mata Acara 4<br>Agenda – Item 4 | |
|---|---|
| **Agenda** | **Keputusan**<br>Resolutions |
| Penunjukan kantor akuntan publik untuk melakukan pemeriksaan (audit) pembukuan tahun 2023.<br>Appointment of a public accounting firm to conduct an audit of the 2023 financial statements. | 1. Menyetujui penunjukan Kantor Akuntan Publik Mirawati Sensi Idris untuk melakukan pemeriksaan (audit) Laporan Keuangan Bank untuk tahun buku yang akan berakhir pada tanggal 31 Desember 2023.<br>2. Memberikan kuasa kepada Dewan Komisaris untuk menetapkan akuntan publik pada Kantor Akuntan Publik Mirawati Sensi Idris untuk melakukan pemeriksaan (audit) Laporan Keuangan Bank untuk tahun buku yang akan berakhir pada tanggal 31 Desember 2023.<br>3. Memberikan kuasa kepada Direksi Bank untuk menetapkan honorarium bagi kantor akuntan publik tersebut, serta persyaratan-persyaratan lain sehubungan dengan penunjukan kantor akuntan publik tersebut.<br>1. Approving the appointment of Mirawati Sensi Idris Public Accounting Firm to conduct an audit of the Bank's Financial Statements for the financial year ending on December 31, 2023.<br>2. Delegating authority to the Board of Commissioners to appoint a public accountant at Mirawati Sensi Idris Public Accounting Firm to conduct an audit of the Bank's Financial Statements for the financial year ending on December 31, 2023.<br>3. Delegating authority to the Bank's Board of Directors to determine the honorarium for the public accounting firm, as well as other requirements in connection with the appointment of the public accounting firm. |
| **Hasil Pemungutan Suara**<br>Voting Results | **Realisasi/Tindak Lanjut**<br>Realization/Follow-up |
| Setuju: 15.475.512.963 saham<br>Tidak Setuju: -<br>Abstain: -<br>Tidak Menentukan: -<br>Agree: 15,475,512,963 shares<br>Disagree: -<br>Abstain: -<br>Did Not Determined: - | Telah direalisasikan pada tahun 2023.<br>It has been realized in 2023 |

| Mata Acara 5<br>Agenda – Item 5 | |
|---|---|
| **Agenda** | **Keputusan**<br>Resolutions |
| Penetapan gaji para anggota Direksi serta honorarium Dewan Komisaris dan Dewan Pengawas Syariah Bank tahun 2023.<br>Determination of salaries for members of the Board of Directors and honorariums for the Board of Commissioners and the Sharia Supervisory Board of the Bank in 2023. | 1. Menetapkan besaran honorarium dan/atau tunjangan lainnya dari Dewan Komisaris dan Dewan Pengawas Syariah Bank dengan besaran minimal sama dengan tahun 2022 dan maksimal peningkatan 20% dari tahun 2022.<br>2. Memberikan wewenang kepada Dewan Komisaris Bank untuk menetapkan gaji dan tunjangan anggota Direksi Bank dengan memperhatikan usul dari Komite Remunerasi dan Nominasi Bank.<br>1. Determining the amount of honorarium and/or other allowances for the Board of Commissioners and the Sharia Supervisory Board of the Bank with a minimum amount equal to 2022 and a maximum increase of 20% from 2022.<br>2. Delegating authority to the Board of Commissioners of the Bank to determine the salary and allowances of members of the Board of Directors of the Bank by taking into account the proposals from the Bank's Remuneration and Nomination Committee. |
| **Hasil Pemungutan Suara**<br>Voting Results | **Realisasi/Tindak Lanjut**<br>Realization/Follow-up |
| Setuju : 15.475.512.963 saham<br>Tidak Setuju : -<br>Abstain : -<br>Tidak Menentukan : -<br>Agree : 15,475,512,963 shares<br>Disagree : -<br>Abstain : -<br>Did Not Determined : - | Telah direalisasikan pada tahun 2023.<br>It has been realized in 2023 |

| Mata Acara 6<br>Agenda – Item 6 | |
|---|---|
| **Agenda** | **Keputusan**<br>Resolutions |
| Laporan Realisasi Penggunaan Dana Penawaran Umum Terbatas II (PUT II).<br>Report on the Realization of the Use of Funds from Limited Public Offering II (PUT II). | Laporan Realisasi Penggunaan Dana Penawaran Umum Terbatas II (PUT II).<br>Report on the Realization of the Use of Funds from Limited Public Offering II (PUT II). |
| **Hasil Pemungutan Suara**<br>Voting Results | **Realisasi/Tindak Lanjut**<br>Realization/Follow-up |
| Tidak ada pengambilan keputusan karena mata acara bersifat laporan.<br>There was no voting because the agenda was of a reporting nature. | Telah direalisasikan pada tahun 2023.<br>It has been realized in 2023 |

| Mata Acara 7<br>Agenda – Item 7 | |
|---|---|
| **Agenda** | **Keputusan**<br>Resolutions |
| Laporan Realisasi Penggunaan Dana Penawaran Umum Berkelanjutan Obligasi Subordinasi I Tahap I Tahun 2022.<br>Report on the Realization of the Use of Proceeds from the Shelf-Registered Public Offering of Subordinated Bonds I Phase I Year 2022. | Laporan Realisasi Penggunaan Dana Penawaran Umum Berkelanjutan Obligasi Subordinasi I Tahap I Tahun 2022.<br>Report on the Realization of the Use of Proceeds from the Shelf-Registered Public Offering of Subordinated Bonds I Phase I Year 2022. |
| **Hasil Pemungutan Suara**<br>Voting Results | **Realisasi/Tindak Lanjut**<br>Realization/Follow-up |
| Tidak ada pengambilan keputusan karena mata acara bersifat laporan.<br>There was no voting because the agenda was of a reporting nature. | Telah direalisasikan pada tahun 2023.<br>It has been realized in 2023. |

| Mata Acara 8<br>Agenda – Item 8 | |
|---|---|
| **Agenda** | **Keputusan**<br>Resolutions |
| Persetujuan Perubahan Susunan Pengurus Bank.<br>Approval of Changes to the Composition of the Bank›s Management. | 1. Menyetujui untuk membatalkan salah satu keputusan RUPS Tahunan tanggal 14 Juni 2022 terkait dengan pengangkatan Bapak Kapil Sharma sebagai Direktur Bank. Adapun keputusan RUPS Tahunan tanggal 14 Juni 2022 selain terkait hal tersebut dinyatakan tetap berlaku.<br>2. Menyetujui pemberhentian dengan hormat Bapak Hanafi Himawan dari jabatannya selaku Direktur Bank serta memberikan pelunasan dan pembebasan (*acquit et de charge*) tanggung jawab sepenuhnya atas tindakan pengurusan yang dilakukan selama menjalankan jabatannya sepanjang tindakan-tindakan tersebut tercermin dalam buku-buku Bank dan tidak bertentangan atau melanggar peraturan perundang-undangan yang berlaku serta mengucapkan terima kasih atas sumbangsih dan jasa-jasa yang telah diberikan, berlaku efektif setelah berlakunya Izin Usaha Bank Umum Syariah (BUS) Hasil Pemisahan Unit Usaha Syariah (UUS) diterbitkan oleh Otoritas Jasa Keuangan dan mengacu kepada hasil penilaian kemampuan dan kepatutan yang dilakukan oleh Otoritas Jasa Keuangan;<br>3. Menyetujui pengangkatan Ibu Enny Kamal sebagai Direktur Bank terhitung efektif setelah mendapatkan persetujuan dari Otoritas Jasa Keuangan sampai dengan berakhirnya masa jabatan Direksi Bank yang saat ini menjabat, yaitu pada saat penutupan RUPS Tahunan yang akan diselenggarakan pada tahun 2026.<br>4. Menyetujui pengangkatan Bapak Sendy sebagai Direktur Bank terhitung efektif setelah mendapatkan persetujuan dari Otoritas Jasa Keuangan sampai dengan berakhirnya masa jabatan Direksi Bank yang saat ini menjabat yaitu pada saat penutupan RUPS Tahunan yang akan diselenggarakan pada tahun 2026.<br>5. Menetapkan berakhirnya masa jabatan seluruh anggota Direksi dan Dewan Komisaris Bank yang saat ini menjabat terhitung sejak ditutupnya Rapat.<br>6. Menetapkan berakhirnya masa jabatan Dewan Pengawas Syariah yang saat ini menjabat terhitung sejak ditutupnya Rapat.<br>7. Menyetujui pengangkatan kembali seluruh anggota Direksi, Dewan Komisaris, dan Dewan Pengawas Syariah Bank untuk masa jabatan terhitung sejak ditutupnya Rapat sampai dengan penutupan RUPS Tahunan pada akhir 1 periode masa jabatan anggota Direksi, Dewan Komisaris, dan Dewan Pengawas Syariah Bank, yaitu pada saat penutupan RUPS Tahunan yang akan diselenggarakan pada tahun 2026.<br>Dengan demikian sejak ditutupnya Rapat, susunan anggota Direksi, Dewan Komisaris, dan Dewan Pengawas Syariah Bank sebagai berikut.<br>**DIREKSI:**<br>Direktur Utama: Frenky Tirtowijoyo<br>Direktur: Halim<br>Direktur: Hanafi Himawan<br>Direktur: Soejanto Soetjijo<br>Direktur: Miko Andidjaja<br>Direktur: Uzan Tedjamulia<br>Direktur: Ekajaya Ongny Putra<br>Direktur: Enny Kamal*)<br>Direktur: Sendy*)<br>**DEWAN KOMISARIS:**<br>Komisaris Utama: Tjendrawati Widjaja<br>Komisaris Independen: Sammy Kristamuljana<br>Komisaris Independen: Rusmin<br>**DEWAN PENGAWAS SYARIAH:**<br>Ketua: Ahmadi Sukarno<br>Anggota: Mochammad Bukhori Muslim<br>Dengan penjelasan sebagai berikut.<br>*) pengangkatan Enny Kamal dan Sendy sebagai Direktur Bank terhitung efektif setelah mendapatkan persetujuandari Otoritas Jasa Keuangan. |

8. Menegaskan kembali susunan anggota Direksi dan Dewan Komisaris Bank setelah berlakunya Izin Usaha BUS Hasil Pemisahan UUS yang diterbitkan oleh Otoritas Jasa Keuangan sebagai berikut.

**DIREKSI:**
Direktur Utama: Frenky Tirtowijoyo
Direktur: Miko Andidjaja
Direktur: Ekajaya Ongny Putra
Direktur: Enny Kamal*)
Direktur: Sendy*)

**DEWAN KOMISARIS:**
Komisaris Utama: Tjendrawati Widjaja
Komisaris Independen: Sammy Kristamuljana
Komisaris Independen: Rusmin

Dengan penjelasan sebagai berikut:
*) pengangkatan Ibu Enny Kamal dan Bapak Sendy sebagai Direktur Bank terhitung efektif setelah mendapatkan persetujuan dari Otoritas Jasa Keuangan.

9. Menunjuk dan memberi kuasa kepada Direksi dan/atau Corporate Secretary Bank dengan hak substitusi untuk melaksanakan keputusan tersebut di atas termasuk tetapi tidak terbatas untuk menandatangani akta pernyataan keputusan rapat di hadapan notaris dan memberitahukan perubahan tersebut kepada pihak yang berwenang.

1. Approving the cancellation of one of the resolutions of the Annual GMS dated June 14, 2022, related to the appointment of Mr. Kapil Sharma as Director of the Bank. The resolutions of the Annual GMS dated June 14, 2022, other than those related to the above, are declared to remain valid.
2. Approving the honorable dismissal of Mr. Hanafi Himawan from his position as Director of the Bank and grant full release and discharge (acquit et de charge) of responsibility for the management actions carried out during his term of office as long as these actions are reflected in the Bank›s books and do not conflict with or violate applicable laws and regulations and express gratitude for the contributions and services that have been provided, effective after the enactment of the Sharia Commercial Bank (BUS) Business License Resulting from the Separation of the Sharia Business Unit (UUS) issued by the Financial Services Authority and referring to the results of the fit and proper assessment conducted by the Financial Services Authority;
3. Approving the appointment of Mrs. Enny Kamal as Director of the Bank effective after obtaining approval from the Financial Services Authority until the end of the term of office of the current Board of Directors of the Bank, namely at the closing of the Annual GMS to be held in 2026.
4. Approving the appointment of Mr. Sendy as Director of the Bank effective after obtaining approval from the Financial Services Authority until the end of the term of office of the Bank›s current Board of Directors, namely at the closing of the Annual GMS to be held in 2026.
5. Determining the end of the term of office of all members of the Bank›s Board of Directors and Board of Commissioners currently serving as of the closing of the Meeting.
6. Determining the end of the term of office of the Sharia Supervisory Board currently serving as of the closing of the Meeting.
7. Approving the reappointment of all members of the Bank›s Board of Directors, Board of Commissioners, and Sharia Supervisory Board for a term of office starting from the closing of the Meeting until the closing of the Annual GMS at the end of 1 term of office of members of the Bank›s Board of Directors, Board of Commissioners, and Sharia Supervisory Board, namely at the closing of the Annual GMS to be held in 2026.

Thus, since the closing of the Meeting, the composition of the members of the Bank›s Board of Directors, Board of Commissioners, and Sharia Supervisory Board is as follows.

**BOARD OF DIRECTORS:**
President Director: Frenky Tirtowijoyo
Director: Halim
Director: Hanafi Himawan
Director: Soejanto Soetjijo
Director: Miko Andidjaja
Director: Uzan Tedjamulia
Director: Ekajaya Ongny Putra
Director: Enny Kamal*)
Director: Sendy*)

**BOARD OF COMMISSIONERS:**
President Commissioner: Tjendrawati Widjaja
Independent Commissioner: Sammy Kristamuljana
Independent Commissioner: Rusmin

**SHARIAH SUPERVISORY BOARD:**
Chairman: Ahmadi Sukarno
Member: Mochammad Bukhori Muslim

With the following explanation.
*) the appointment of Enny Kamal and Sendy as Bank Directors is effective after obtaining approval from the Financial Services Authority.

8. Reaffirming the composition of the Board of Directors and Board of Commissioners of the Bank after the enactment of the BUS Business License Resulting from the Separation of UUS issued by the Financial Services Authority as follows.

**BOARD OF DIRECTORS:**
President Director: Frenky Tirtowijoyo
Director: Miko Andidjaja
Director: Ekajaya Ongny Putra
Director: Enny Kamal*)
Director: Sendy*)

**BOARD OF COMMISSIONERS:**
President Commissioner: Tjendrawati Widjaja
Independent Commissioner: Sammy Kristamuljana
Independent Commissioner: Rusmin

With the following explanation:
*) the appointment of Mrs. Enny Kamal and Mr. Sendy as Directors of the Bank is effective after obtaining approval from the Financial Services Authority.

9. Appointing and granting power to the Board of Directors and/or Corporate Secretary of the Bank with the right of substitution to implement the above resolutions, including but not limited to signing the deed of statement of meeting resolutions in the presence of a Notary and notifying the changes to the authorized party.

| **Hasil Pemungutan Suara**<br>Voting Results | **Realisasi/Tindak Lanjut**<br>Realization/Follow-up |
|---|---|
| Setuju: 15.475.512.963 saham<br>Tidak Setuju: -<br>Abstain: -<br>Tidak Menentukan: -<br>Agree: 15,475,512,963 shares<br>Disagree: -<br>Abstain: -<br>Did Not Determined: - | Telah direalisasikan pada tahun 2023.<br>It has been realized in 2023.<br><br>Pada tanggal 1 Januari 2024, komposisi anggota Direksi Bank Sinarmas mengalami perubahan sebagai hasil dari efektifnya pemisahan Unit Usaha Syariah. Dengan demikian, komposisi Direksi dan Dewan Komisaris sebagai berikut.<br>**DIREKSI:**<br>Direktur Utama: Frenky Tirtowijoyo<br>Direktur: Miko Andidjaja<br>Direktur: Ekajaya Ongny Putra<br>Direktur: Enny Kamal<br>Direktur: Sendy<br>**DEWAN KOMISARIS:**<br>Komisaris Utama: Tjendrawati Widjaja<br>Komisaris Independen: Sammy Kristamuljana<br>Komisaris Independen: Rusmin<br><br>On January 1, 2024, the composition of the Board of Directors of Bank Sinarmas changed as a result of the effective separation of the Sharia Business Unit. Thus, the composition of the Board of Directors and Board of Commissioners is as follows.<br>**BOARD OF DIRECTORS:**<br>President Director: Frenky Tirtowijoyo<br>Director: Miko Andidjaja<br>Director: Ekajaya Ongny Putra<br>Director: Enny Kamal<br>Director: Sendy<br>**BOARD OF COMMISSIONERS:**<br>President Commissioner: Tjendrawati Widjaja<br>Independent Commissioner: Sammy Kristamuljana<br>Independent Commissioner: Rusmin |

| Mata Acara 9<br>Agenda – Item 9 | |
|---|---|
| **Agenda** | **Keputusan**<br>Resolutions |
| Persetujuan Perubahan Anggaran Dasar Bank.<br>Approval of Amendments to the Bank's Articles of Association. | 1. Menyetujui perubahan Anggaran Dasar Bank efektif setelah berlakunya Izin Usaha BUS Hasil Pemisahan UUS yang diterbitkan oleh Otoritas Jasa Keuangan, yaitu:<br>a. Mengubah Pasal 3 Anggaran Dasar Bank tentang maksud dan tujuan serta kegiatan usaha Bank dengan memperhatikan implementasi Klasifikasi Baku Lapangan Usaha Indonesia (KBLI) 2020; dan<br>b. Menghapus Pasal 20 Anggaran Dasar Bank tentang Dewan Pengawas Syariah.<br>2. Memberikan kuasa kepada Direksi Bank dan/atau Corporate Secretary Bank dengan hak substitusi untuk melakukan segala tindakan yang diperlukan berkaitan dengan keputusan Mata Acara Rapat ini, termasuk namun tidak terbatas untuk menyusun dan menyatakan kembali seluruh Anggaran Dasar Bank dalam suatu akta notaris, dan untuk memberitahukan dan/atau mengajukan permohonan persetujuan atas perubahan Anggaran Dasar Bank tersebut kepada Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dan instansi-instansi terkait, dan untuk melaksanakan tindakan lainnya yang mungkin diperlukan tanpa ada yang dikecualikan.<br>1. Approving the changes to the Bank's Articles of Association effective after the enactment of the BUS Business License Resulting from the Separation of UUS issued by the Financial Services Authority, namely:<br>a. Change Article 3 of the Bank's Articles of Association concerning the purpose and objectiveve and business activities of the Bank by taking into account the implementation of the 2020 Indonesian Standard Industrial Classification (KBLI); and<br>b. Remove Article 20 of the Bank's Articles of Association concerning the Sharia Supervisory Board.<br>2. Granting power to the Bank's Board of Directors and/or the Bank's Corporate Secretary with the right of substitution to take all necessary actions related to the resolutions of this Meeting Agenda, including but not limited to compiling and restating the entire Bank's Articles of Association in a notarial deed, and to notify and/or submit a request for approval of the changes to the Bank's Articles of Association to the Minister of Law and Human Rights of the Republic of Indonesia and related agencies, and to carry out other actions that may be necessary without exception. |
| **Hasil Pemungutan Suara**<br>Voting Results | **Realisasi/Tindak Lanjut**<br>Realization/Follow-up |
| Setuju: 15.475.512.963 saham<br>Tidak Setuju: -<br>Abstain: -<br>Tidak Menentukan: -<br>Agree: 15,475,512,963 shares<br>Disagree: -<br>Abstain: -<br>Did Not Determined: - | Telah direalisasikan pada tahun 2023.<br>It has been realized in 2023 |



# DEWAN KOMISARIS
## Board Of Commissioners

Dewan Komisaris merupakan organ yang bertanggung jawab untuk mengawasi dan mengarahkan keberlanjutan usaha Bank, serta turut serta dalam memantau efektivitas implementasi GCG pada semua tingkatan organisasi. Dewan Komisaris juga turut memberikan nasihat kepada Direksi atas jalannya kegiatan usaha Bank. **[GRI 2-11]**

Proses pengangkatan dan pemberhentian Dewan Komisaris dilakukan melalui RUPS berdasarkan rekomendasi Komite Remunerasi dan Nominasi, dengan periode jabatan yang ditetapkan dalam RUPS. Komposisi Dewan Komisaris disesuaikan dengan kebutuhan dan kompleksitas Bank, mempertimbangkan keahlian, pengalaman profesional, dan latar belakang masing-masing anggota.

The Board of Commissioners is the organ responsible for supervising and directing the sustainability of the Bank's business and participating in monitoring the effectiveness of GCG implementation at all levels of the organization. The Board of Commissioners also provides advice to the Board of Directors on the Bank's business activities. **[GRI 2-11]**

The process of appointing and dismissing the Board of Commissioners is carried out through the GMS based on the recommendation of the Remuneration and Nomination Committee, with the term of office determined in the GMS. The composition of the Board of Commissioners is adjusted to the needs and complexity of the Bank, considering the expertise, professional experience, and background of each member.

## Pedoman Dewan Komisaris

Bank telah menyusun Pedoman Dewan Komisaris yang ditetapkan melalui No.SK.041/2018/PRESKOM tentang Pedoman Dewan Komisaris Rev 2.0 PT. Bank Sinarmas Tbk. tertanggal 17 Oktober 2018. Isi pedoman tersebut, terdiri dari:

1. Ketentuan Umum;
2. Landasan Hukum;
3. Keanggotaan;
4. Masa Jabatan;
5. Pengunduran dan Pemberhentian Dewan Komisaris;
6. Benturan Kepentingan;
7. Rangkap Jabatan;
8. Transparansi Dewan Komisaris;
9. Deskripsi Tugas, Tanggung Jawab Secara Umum;
10. Wewenang;
11. Nilai-nilai;
12. Orientasi Dewan Komisaris;
13. Pelaporan; dan
14. Larangan.

## Tata Tertib Kerja Dewan Komisaris

Dewan Komisaris juga memiliki tata tertib yang memuat berbagai aspek terkait prosedur, kewajiban, dan tanggung jawab anggota Dewan Komisaris dalam menjalankan tugasnya. Tata tertib tersebut diatur dalam Surat Keputusan Dewan Komisaris No.SK.053/2024/PRESDIR tentang Tata Tertib Kerja Dewan Komisaris versi 3.0, tanggal 16 Agustus 2024. Beberapa ketentuan yang tercantum dalam Tata Tertib Dewan Komisaris, antara lain:

1. Waktu Kerja dan Cuti Dewan Komisaris;
2. Rapat;
3. Perjalanan Dinas Dewan Komisaris;
4. Kuasa Umum;
5. Pelatihan Dewan Komisaris;
6. Pakaian;
7. Kepatuhan Terhadap Peraturan; dan
8. Kode Etik.

## Tugas dan Tanggung Jawab Dewan Komisaris

Tugas dan tanggung jawab Dewan Komisaris berdasarkan pedoman kerja, yakni:

1. Dewan Komisaris wajib melaksanakan tugas dan tanggung jawab secara independen;
2. Dewan Komisaris wajib memastikan penerapan tata kelola yang baik terselenggara dalam setiap kegiatan usaha Bank pada seluruh tingkatan atau jenjang organisasi;
3. Dewan Komisaris bertugas melakukan pengawasan dan bertanggung jawab atas pengawasan terhadap kebijakan pengurusan, jalannya pengurusan pada umumnya, baik mengenai Bank maupun usaha Bank, dan memberi nasihat kepada Direksi;
4. Dewan Komisaris wajib mengarahkan, memantau, dan mengevaluasi pelaksanaan kebijakan strategis Bank;

## Board of Commissioners Guidelines

The Bank has prepared the Board of Commissioners Guidelines, which are stipulated through No.SK.041/2018/PRESKOM concerning the Board of Commissioners Guidelines Rev 2.0 PT. Bank Sinarmas Tbk., dated October 17, 2018. The contents of the guidelines consist of:

1. General Provisions;
2. Legal Basis;
3. Membership;
4. Term of Office;
5. Resignation and Dismissal of the Board of Commissioners;
6. Conflict of Interest;
7. Concurrent Positions;
8. Transparency of the Board of Commissioners;
9. General Description of Duties and Responsibilities;
10. Authority;
11. Values;
12. Orientation of the Board of Commissioners;
13. Reporting; and
14. Prohibitions.

## Charter of the Board of Commissioners

The Board of Commissioners also has a charter that contain various aspects related to procedures, obligations, and responsibilities of members of the Board of Commissioners in carrying out their duties. These rules are regulated in the Decree of the Board of Commissioners No.SK.053/2024/PRESDIR concerning the Board of Commissioners Charter version 3.0, dated August 16, 2024. Several provisions contained in the Board of Commissioners Charter include:

1. Board of Commissioners Working Hours and Leave;
2. Meetings;
3. Official Travel of the Board of Commissioners;
4. General Power of Attorney;
5. Training of the Board of Commissioners;
6. Clothing;
7. Compliance with Regulations; and
8. Code of Ethics.

## Duties and Responsibilities of the Board of Commissioners

The duties and responsibilities of the Board of Commissioners are based on the work guidelines, namely:

1. The Board of Commissioners is required to carry out its duties and responsibilities independently;
2. The Board of Commissioners must ensure that good governance is implemented in every business activity of the Bank at all levels of the organization;
3. The Board of Commissioners is tasked with supervising and is responsible for supervising management policies and the course of management in general, both regarding the Bank and the Bank's business, and providing advice to the Board of Directors;
4. The Board of Commissioners must direct, monitor, and evaluate the implementation of the Bank's strategic policies;

5. Dalam melaksanakan pengawasan, Dewan Komisaris dilarang ikut serta dalam pengambilan keputusan kegiatan operasional Bank, kecuali:
   a. Penyediaan dana kepada pihak terkait sebagaimana diatur dalam ketentuan mengenai batas maksimum pemberian kredit bank umum;
   b. Hal-hal lain yang ditetapkan dalam anggaran dasar Bank atau peraturan perundang-undangan;
6. Pengambilan keputusan kegiatan operasional Bank oleh Dewan Komisaris merupakan bagian dari tugas pengawasan oleh Dewan Komisaris sehingga tidak meniadakan tanggung jawab Direksi atas pelaksanaan kepengurusan Bank;
7. Dalam pelaksanaan audit internal, Dewan Komisaris bertanggung jawab:
   a. Memastikan Direksi menyusun dan memelihara sistem pengendalian internal yang memadai, efektif, dan efisien;
   b. Mengkaji efektivitas dan efisiensi sistem pengendalian internal berdasarkan informasi yang diperoleh dari SKAI paling sedikit sekali dalam 1 tahun; dan
   c. Menunjuk pengendalian mutu independen dari pihak eksternal untuk melakukan kaji ulang terhadap kinerja SKAI dengan mempertimbangkan rekomendasi Komite Audit.
8. Tanggung jawab akhir pengawasan dilakukan oleh Dewan Komisaris, antara lain dengan mengevaluasi hasil temuan pemeriksaan oleh SKAI. Dalam kaitan ini, Dewan Komisaris berwenang untuk meminta Direksi menindaklanjuti hasil temuan pemeriksaan SKAI;
9. Dewan Komisaris wajib memastikan bahwa Direksi telah menindaklanjuti temuan audit dan rekomendasi dari SKAI, auditor eksternal, hasil pengawasan Otoritas Jasa Keuangan dan/atau hasil pengawasan otoritas lain;
10. Dewan Komisaris wajib melakukan pengawasan terhadap pelaksanaan Fungsi Kepatuhan;
11. Dewan Komisaris wajib melakukan pengawasan terhadap Fungsi Kepatuhan, dengan:
    a. Mengawasi pelaksanaan fungsi kepatuhan Bank paling sedikit 2 kali dalam 1 (tahun; dan
    b. Memberikan saran untuk meningkatkan kualitas pelaksanaan Fungsi Kepatuhan Bank;
12. Dewan Komisaris paling sedikit melakukan:
    a. Pengawasan terhadap penerapan pelaksanaan kebijakan remunerasi; dan
    b. Evaluasi secara berkala atas kebijakan remunerasi atas dasar hasil pengawasan sebagaimana dimaksud huruf a;
13. Dewan Komisaris wajib melakukan pengawasan secara aktif terhadap pelaksanaan kebijakan restrukturisasi kredit;

5. In carrying out supervision, the Board of Commissioners is prohibited from participating in decision-making on the Bank's operational activities, except:
   a. Provision of funds to related parties as stipulated in the provisions concerning the legal lending limit for general bank credit;
   b. Other matters stipulated in the Bank's articles of association or laws and regulations;
6. Decision-making on the Bank's operational activities by the Board of Commissioners is part of the Board of Commissioners' supervisory duties, ensuring that it does not eliminate the Board of Directors' responsibility for the implementation of the Bank's management;
7. In carrying out internal audits, the Board of Commissioners is responsible for:
   a. Ensuring that the Board of Directors prepares and maintains an adequate, effective, and efficient internal control system;
   b. Reviewing the effectiveness and efficiency of the internal control system based on information obtained from SKAI at least once a year; and
   c. Appointing independent quality control from external parties to conduct a review of SKAI's performance by considering the recommendations of the Audit Committee.
8. The final responsibility for supervision is carried out by the Board of Commissioners, including by evaluating the results of the audit findings by SKAI. In this regard, the Board of Commissioners has the authority to request the Board of Directors to follow up on the results of the SKAI audit findings;
9. The Board of Commissioners is required to ensure that the Board of Directors has followed up on the audit findings and recommendations from SKAI, external auditors, the results of supervision by the Financial Services Authority, and/or the results of supervision by other authorities;
10. The Board of Commissioners is required to supervise the implementation of the Compliance Function;
11. The Board of Commissioners is required to supervise the Compliance Function by:
    a. Supervising the implementation of the Bank's compliance function at least twice a year; and
    b. Providing suggestions to improve the quality of the implementation of the Bank's Compliance Function;
12. The Board of Commissioners shall at least carry out:
    a. Supervision of the implementation of the remuneration policy; and
    b. Periodic evaluation of the remuneration policy based on the results of supervision as referred to in letter a;
13. The Board of Commissioners shall actively supervise the implementation of the credit restructuring policy;

14. Dalam kondisi tertentu, Dewan Komisaris wajib menyelenggarakan RUPS Tahunan dan RUPS lainnya sesuai dengan kewenangannya sebagaimana diatur dalam peraturan perundang-undangan dan Anggaran Dasar;
15. Anggota Dewan Komisaris wajib melaksanakan tugas dan tanggung jawabnya dengan itikad baik, penuh tanggung jawab dan kehati-hatian;
16. Dalam rangka mendukung efektivitas pelaksanaan tugas dan tanggung jawab, Dewan Komisaris wajib membentuk paling sedikit:
    a. Komite Audit;
    b. Komite Pemantau Risiko; dan
    c. Komite Remunerasi dan Nominasi;
17. Dewan Komisaris wajib memastikan bahwa komite yang telah dibentuk menjalankan tugas secara efektif;

18. Setiap Dewan Komisaris bertanggung jawab secara tanggung renteng (kolegial) atas kerugian Bank yang disebabkan oleh kesalahan atau kelalaian anggota Dewan Komisaris dalam menjalankan tugasnya;
19. Anggota Dewan Komisaris tidak dapat dipertanggungjawabkan atas kerugian Bank apabila dapat membuktikan:
    a. Kerugian tersebut bukan karena kesalahan atau kelalaiannya;
    b. Telah melakukan pengurusan dengan itikad baik, penuh tanggung jawab, dan kehati-hatian untuk kepentingan dan sesuai dengan maksud dan tujuan Perseroan;
    c. Tidak mempunyai benturan kepentingan baik langsung maupun tidak langsung atas tindakan pengurusan yang mengakibatkan kerugian;
    d. Telah mengambil tindakan untuk mencegah timbul atau berlanjutnya kerugian tersebut.

## Tugas dan Tanggung Jawab Komisaris Utama

Tugas dan tanggung Jawab Komisaris Utama Bank Sinarmas, yakni:

1. Mengoordinasikan pelaksanaan tugas dan tanggung jawab Dewan Komisaris;
2. Memimpin rapat Dewan Komisaris;
3. Memimpin RUPS;
4. Menyampaikan Laporan Pengawasan untuk mendapatkan persetujuan RUPS Tahunan atas pelaksanaan tugas dan pengawasan Dewan Komisaris.
5. Memastikan bahwa pelaksanaan tanggung jawab Dewan Komisaris telah dilaksanakan sesuai prosedur.

6. Memastikan bahwa rapat Dewan Komisaris melakukan pengambilan keputusan secara efektif berdasarkan informasi yang benar dan lengkap, termasuk memastikan bahwa:
    a. Semua isu-isu strategis dan penting menjadi bahan pertimbangan oleh Dewan Komisaris;

14. Under certain conditions, the Board of Commissioners shall hold an Annual GMS and other GMS in accordance with its authority as stipulated in laws and regulations and the Articles of Association;

15. Members of the Board of Commissioners shall carry out their duties and responsibilities in good faith, with full responsibility and prudence;
16. In order to support the effectiveness of the implementation of duties and responsibilities, the Board of Commissioners shall form at least:
    a. Audit Committee;
    b. Risk Monitoring Committee; and
    c. Remuneration and Nomination Committee;
17. The Board of Commissioners shall ensure that the committees that have been formed carry out their duties effectively;
18. Each Board of Commissioners is jointly and severally liable for the Bank's losses caused by the errors or negligence of members of the Board of Commissioners in carrying out their duties;
19. Members of the Board of Commissioners cannot be held responsible for the Bank's losses if they can prove:
    a. The loss was not due to their error or negligence;
    b. They have carried out management in good faith, with full responsibility, and with prudence for the interests and in accordance with the purpose and objective of the Company;
    c. They do not have a conflict of interest, either directly or indirectly, regarding management actions that result in losses;
    d. They have taken action to prevent the occurrence or continuation of such losses.

## Duties and Responsibilities of the President Commissioner

The duties and responsibilities of the President Commissioner of Bank Sinarmas are:

1. Coordinating the implementation of the duties and responsibilities of the Board of Commissioners;
2. Chairing the Board of Commissioners meeting;
3. Chairing the GMS;
4. Submitting the Supervisory Report to obtain approval from the Annual GMS for the implementation of the duties and supervision of the Board of Commissioners.
5. Ensuring that the implementation of the Board of Commissioners' responsibilities has been carried out in accordance with procedures.
6. Ensuring that the Board of Commissioners meeting makes decisions effectively based on correct and complete information, including ensuring that:
    a. All strategic and important issues are considered by the Board of Commissioners;

b. Permasalahan yang ada dibahas dengan seksama dan teliti;
c. Semua anggota Dewan Komisaris diberi kesempatan untuk berkontribusi secara efektif;
d. Setiap Komisaris menerima informasi yang relevan secara tepat waktu, termasuk diberi penjelasan singkat mengenai isu-isu yang akan dibahas dalam rapat Dewan Komisaris;
e. Rapat Dewan Komisaris menghasilkan keputusan-keputusan yang jelas dan dicatat dalam notulen rapat; dan

7. Melakukan evaluasi akhir dengan mempertimbangkan rekomendasi Komite Remunerasi dan Nominasi, atas hasil penilaian kinerja kolegial Dewan Komisaris dan komitenya serta penilaian kinerja individu atas setiap anggota Dewan Komisaris dan anggota komite-komitenya.

## Wewenang Dewan Komisaris

Wewenang yang dimiliki oleh Dewan Komisaris dalam mendukung pelaksanaan tugas dan tanggung jawabnya, antara lain:

1. Dewan Komisaris berwenang memberhentikan sementara anggota Direksi dengan menyebutkan alasannya;
2. Dewan Komisaris dapat melakukan tindakan pengurusan Bank dalam keadaan tertentu untuk jangka waktu tertentu;
3. Wewenang sebagaimana dimaksud pada poin 2 ditetapkan berdasarkan Anggaran Dasar atau keputusan RUPS.

## Keputusan yang Perlu Mendapat Persetujuan Dewan Komisaris

Berdasarkan Peraturan Otoritas Jasa Keuangan No. 17 tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum, Dewan Komisaris diperbolehkan mengambil keputusan terkait:

1. Penyediaan dana kepada pihak terkait sesuai dengan Peraturan Otoritas Jasa Keuangan mengenai batas maksimum pemberian kredit dan penyediaan dana besar bagi bank umum dan Peraturan Otoritas Jasa Keuangan mengenai batas maksimum penyaluran dana dan penyaluran dana besar bagi bank umum syariah; dan

2. Hal lain yang ditetapkan dalam Anggaran Dasar Bank atau ketentuan peraturan perundang-undangan.

## Kriteria Anggota Dewan Komisaris

Kriteria keanggotaan Dewan Komisaris Bank Sinarmas, yakni:

1. Bank wajib memiliki anggota Dewan Komisaris dengan jumlah paling sedikit 3 orang dan paling banyak sama dengan jumlah anggota Direksi;

b. Existing problems are discussed carefully and thoroughly;
c. All members of the Board of Commissioners are given the opportunity to contribute effectively;
d. Each Commissioner receives relevant information in a timely manner, including being given a brief explanation of the issues to be discussed in the Board of Commissioners meeting;
e. The Board of Commissioners meeting produces clear resolutions and is recorded in the minutes of the meeting; and

7. Conduct a final evaluation by considering the recommendations of the Remuneration and Nomination Committee on the results of the collegial performance assessment of the Board of Commissioners and its committees as well as the individual performance assessment of each member of the Board of Commissioners and members of its committees.

## Authority of the Board of Commissioners

The authority held by the Board of Commissioners in supporting the implementation of its duties and responsibilities, among others:

1. The Board of Commissioners has the authority to temporarily dismiss members of the Board of Directors by stating the reasons;
2. The Board of Commissioners can take actions to manage the Bank in certain circumstances for a certain period of time;
3. The authority as referred to in point 2 is determined based on the Articles of Association or the decision of the GMS.

## Decisions Requiring Approval from the Board of Commissioners

Based on Financial Services Authority Regulation No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks, the Board of Commissioners is permitted to make decisions related to:

1. Provision of funds to related parties in accordance with the Financial Services Authority Regulation concerning the legal lending limit for providing credit and the provision of large funds for commercial banks and the Financial Services Authority Regulation concerning the legal lending limit for channeling funds and the distribution of large funds for Islamic commercial banks; and
2. Other matters stipulated in the Bank's Articles of Association or provisions of laws and regulations.

## Criteria for Members of the Board of Commissioners

The criteria for membership of the Board of Commissioners of Bank Sinarmas are:

1. The Bank must have a Board of Commissioners with a minimum of 3 members and a maximum of the same number of members as the Board of Directors;

2. Anggota Dewan Komisaris harus memenuhi persyaratan penilaian kemampuan dan kepatutan sesuai Peraturan Otoritas Jasa Keuangan mengenai Penilaian Kemampuan dan Kepatutan bagi Pihak Utama Lembaga Jasa Keuangan;
3. Anggota Dewan Komisaris paling sedikit 1 orang wajib berdomisili di Indonesia;
4. Dewan Komisaris wajib dipimpin oleh Presiden Komisaris atau Komisaris Utama;
5. Dewan Komisaris wajib terdiri dari Komisaris Independen dan Komisaris Non-Independen;
6. Komisaris Independen wajib paling sedikit berjumlah 50%dari jumlah anggota Dewan Komisaris;
7. Anggota Dewan Komisaris adalah orang perseorangan yang memenuhi persyaratan pada saat diangkat dan selama menjabat:
   a. Mempunyai akhlak, moral dan integritas yang baik;
   b. Cakap melakukan perbuatan hukum;
   c. Dalam 5 tahun sebelum pengangkatan dan selama menjabat:
      1) Tidak pernah dinyatakan pailit;
      2) Tidak pernah menjadi anggota Direksi dan/atau Dewan Komisaris yang dinyatakan bersalah menyebabkan suatu perusahaan dinyatakan pailit;
      3) Tidak pernah dihukum karena melakukan tindak pidana yang merugikan keuangan negara dan/atau yang berkaitan dengan sektor keuangan; dan
      4) Tidak pernah menjadi anggota Direksi dan/atau anggota Dewan Komisaris yang selama menjabat:
         a) Pernah tidak menyelenggarakan RUPS tahunan;
         b) Pertanggungjawabannya sebagai anggota Direksi dan/atau anggota Dewan Komisaris pernah tidak diterima oleh RUPS atau pernah tidak memberikan pertanggungjawaban sebagai anggota Direksi dan/atau anggota Dewan Komisaris kepada RUPS;
         c) Pernah menyebabkan perusahaan yang memperoleh izin, persetujuan atau pendaftaran dari Otoritas Jasa Keuangan tidak memenuhi kewajiban menyampaikan laporan tahunan dan/atau laporan keuangan kepada Otoritas Jasa Keuangan.
   d. Memiliki komitmen untuk mematuhi peraturan perundang-undangan;
   e. Memiliki pengetahuan dan/atau keahlian di bidang yang dibutuhkan Bank;
8. Selain memenuhi ketentuan pada poin 7, Komisaris Independen wajib memenuhi persyaratan sebagai berikut:
   a. Bukan merupakan orang yang bekerja atau mempunyai wewenang dan tanggung jawab untuk merencanakan, memimpin, mengendalikan, atau

2. Members of the Board of Commissioners must meet the requirements for a fit and proper assessment in accordance with the Financial Services Authority Regulation concerning the Fit and Proper Assessment for Main Parties of Financial Services Institutions;
3. At least 1 member of the Board of Commissioners must be domiciled in Indonesia;
4. The Board of Commissioners must be led by the President Commissioner;
5. The Board of Commissioners must consist of Independent Commissioners and Non-Independent Commissioners;
6. Independent Commissioners must be at least 50% of the total number of members of the Board of Commissioners;
7. Members of the Board of Commissioners are individuals who meet the following requirements at the time of appointment and during their term of office:
   a. Have good morals, ethics, and integrity;
   b. Capable of carrying out legal acts;
   c. In the 5 years prior to appointment and during their term of office:
      1) Has never been declared bankrupt;
      2) Has never been a member of the Board of Directors and/or Board of Commissioners who was found guilty of causing a company to be declared bankrupt;
      3) Has never been convicted of committing a crime that harmed state finances and/or related to the financial sector; and
      4) Has never been a member of the Board of Directors and/or member of the Board of Commissioners who, during their term of office:
         a) Has never held an annual GMS;
         b) His/her accountability as a member of the Board of Directors and/or member of the Board of Commissioners has never been accepted by the GMS or he/she has never provided accountability as a member of the Board of Directors and/or member of the Board of Commissioners to the GMS;
         c) Has ever caused a company that has obtained a permit, approval, or registration from the Financial Services Authority to fail to fulfill its obligation to submit an annual report and/or financial statement to the Financial Services Authority.
   d. Has a commitment to comply with laws and regulations;
   e. Has knowledge and/or expertise in the field required by the Bank;
8. In addition to fulfilling the provisions in point 7, Independent Commissioners must meet the following requirements:
   a. Is not a person who works or has the authority and responsibility to plan, lead, control, or supervise the Bank's activities in the last 6 months, except for

mengawasi kegiatan Bank dalam waktu 6 bulan terakhir, kecuali untuk pengangkatan kembali sebagai Komisaris Independen Bank pada periode berikutnya;

b. Tidak mempunyai saham baik langsung maupun tidak langsung pada Bank;
c. Tidak mempunyai hubungan afiliasi dengan Bank, anggota Dewan Komisaris, anggota Direksi, atau Pemegang Saham utama Bank;
d. Tidak mempunyai hubungan usaha baik langsung maupun tidak langsung yang berkaitan dengan kegiatan usaha Bank;

9. Mantan anggota Direksi atau Pejabat Eksekutif Bank atau pihak-pihak yang mempunyai hubungan dengan Bank, yang dapat memengaruhi kemampuan yang bersangkutan untuk bertindak independen wajib menjalani masa tunggu (*cooling off*) paling singkat 1 tahun sebelum menjadi Komisaris Independen Bank;
10. Ketentuan pada poin 9 tidak berlaku bagi mantan anggota Direksi yang membawahkan fungsi pengawasan atau Pejabat Eksekutif yang melakukan fungsi pengawasan pada Bank;
11. Komisaris Non Independen dapat beralih menjadi Komisaris Independen setelah memenuhi persyaratan sebagai Komisaris Independen;
12. Komisaris Non Independen yang akan beralih menjadi Komisaris Independen wajib menjalani masa tunggu (*cooling off*) paling singkat 6 bulan; dan
13. Peralihan dari Komisaris Non Independen menjadi Komisaris Independen wajib memperoleh persetujuan Otoritas Jasa Keuangan.

## Komposisi Dewan Komisaris

Komposisi Dewan Komisaris Bank Sinarmas disesuaikan dengan ketentuan 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. Pada tahun 2024, tidak terdapat perubahan komposisi Dewan Komisaris, sebagaimana diungkapkan berikut.

reappointment as an Independent Commissioner of the Bank in the following period;

b. Does not have shares either directly or indirectly in the Bank;
c. Does not have an affiliated relationship with the Bank, members of the Board of Commissioners, members of the Board of Directors, or the Bank's main Shareholders;
d. Does not have any direct or indirect business relationship related to the Bank's business activities;

9. Former members of the Board of Directors or Executive Officers of the Bank or parties who have a relationship with the Bank, which may affect the ability of the person concerned to act independently, must undergo a cooling-off period of at least 1 year prior becoming an Independent Commissioner of the Bank;
10. The provisions in point 9 do not apply to former members of the Board of Directors who are in charge of supervisory functions or Executive Officers who carry out supervisory functions at the Bank;
11. Non-Independent Commissioners can switch to become Independent Commissioners after fulfilling the requirements as Independent Commissioners;
12. Non-Independent Commissioners who will switch to become Independent Commissioners are required to undergo a cooling-off period of at least 6 months; and
13. The transition from Non-Independent Commissioner to Independent Commissioner must obtain approval from the Financial Services Authority.

## Composition of the Board of Commissioners

The composition of the Board of Commissioners of Bank Sinarmas is adjusted to the provisions of the Financial Services Authority Regulation No. 17 of 2023 and the Financial Services Authority Circular Letter No. 13/SEOJK.03/2017 concerning the Implementation of Governance for Commercial Banks. In 2024, there were no changes to the composition of the Board of Commissioners, as disclosed below.

| Nama<br>Name | Jabatan<br>Position | Dasar Pengangkatan<br>Basis of Appointment | Periode Masa Jabatan<br>Term of Office |
|---|---|---|---|
| Tjendrawati Widjaja | Komisaris Utama<br>President Commissioner | Pertama kali diangkat sebagai Komisaris Utama berdasarkan Keputusan RUPS Luar Biasa per tanggal 21 Desember 2009 dan efektif menjabat sejak 20 April 2010 dengan akhir periode jabatan hingga dilaksanakannya RUPS Tahunan 2026.<br>Appointed as President Commissioner for the first time based on the Resolution of the Extraordinary GMS dated December 21, 2009, and effectively served since April 20, 2010, with the end of the term of office until the implementation of the 2026 Annual GMS. | 2023-2026 |
| Sammy Kristamuljana | Komisaris Independen<br>Independent Commissioner | Pertama kali diangkat sebagai Komisaris Independen berdasarkan Keputusan RUPS Luar Biasa per tanggal 15 Juni 2012 dan efektif menjabat sejak 3 Juli 2012 dengan akhir periode jabatan hingga dilaksanakannya RUPS Tahunan 2026.<br>Appointed as Independent Commissioner for the first time based on the Resolution of the Extraordinary GMS dated June 15, 2012, and effectively served since July 3, 2012, with the end of the term of office until the implementation of the 2026 Annual GMS. | 2023-2026 |

| Nama<br>Name | Jabatan<br>Position | Dasar Pengangkatan<br>Basis of Appointment | Periode Masa Jabatan<br>Term of Office |
|---|---|---|---|
| Rusmin | Komisaris Independen<br>Independent Commissioner | Pertama kali diangkat sebagai Komisaris Independen berdasarkan Keputusan RUPS Luar Biasa per tanggal 13 Juni 2014 dan efektif menjabat sejak 19 Juni 2014 dengan akhir periode jabatan hingga dilaksanakannya RUPS Tahunan 2026.<br>Appointed as Independent Commissioner for the first time based on the Resolution of the Extraordinary GMS dated June 13, 2014, and effectively served since June 19, 2014, with the end of the term of office until the implementation of the 2026 Annual GMS. | 2023-2026 |

## Kriteria Khusus Dewan Komisaris: Penilaian Kemampuan dan Kepatutan

Bank memastikan bahwa semua anggota Dewan Komisaris telah lulus penilaian kemampuan dan kepatutan (*fit and proper test*). Komitmen ini merupakan wujud kepatuhan Bank terhadap Peraturan Otoritas Jasa Keuangan No. 27/POJK.03/2016 Penilaian Kemampuan dan Kepatutan bagi Pihak Utama Lembaga Jasa Keuangan. Informasi mengenai hasil *fit and proper test* Dewan Komisaris Bank Sinarmas diungkapkan pada tabel berikut.

## Special Criteria for the Board of Commissioners: Fit and Proper Test

The Bank ensures that all members of the Board of Commissioners have passed the fit and proper test. This commitment is a manifestation of the Bank's compliance with Financial Services Authority Regulation No. 27/POJK.03/2016 on Fit and Proper Test for Main Parties of Financial Services Institutions. Information regarding the results of the fit and proper test for the Board of Commissioners of Bank Sinarmas is disclosed in the following table.

| Nama<br>Name | Jabatan<br>Position | Pelaksana<br>Implementation | No. Surat<br>Letter No. | Tanggal<br>Date | Hasil<br>Result |
|---|---|---|---|---|---|
| Tjendrawati Widjaja | Komisaris Utama<br>President Commissioner | Bank Indonesia | 12/44/GB/DPIP/Rahasia | 20 April 2010<br>April 20, 2010 | Lulus<br>Passed |
| Sammy Kristamuljana | Komisaris Independen<br>Independent Commissioner | Bank Indonesia | 14/61/GBI/DPIP/Rahasia | 3 Juli 2012<br>July 3, 2012 | Lulus<br>Passed |
| Rusmin | Komisaris Independen<br>Independent Commissioner | Otoritas Jasa Keuangan<br>Financial Service Authority | 14/61/GBI/DPIP/Rahasia | 19 Juni 2014<br>June 19, 2014 | Lulus<br>Passed |

## Rangkap Jabatan Dewan Komisaris

Sesuai ketentuan Peraturan Otoritas Jasa Keuangan No. 17 tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum, Dewan Komisaris Bank Sinarmas diperkenankan untuk merangkap jabatan dengan memperhatikan beberapa hal, yakni:

1. Anggota Dewan Komisaris menjabat sebagai anggota Direksi, anggota Dewan Komisaris atau Pejabat Eksekutif yang melaksanakan fungsi pengawasan pada 1 Entitas Anak bukan bank yang dikendalikan oleh Bank;
2. Komisaris Non-Independen menjalankan tugas fungsional dari Pemegang Saham Bank yang berbentuk badan hukum pada kelompok usaha Bank; dan/atau
3. Anggota Dewan Komisaris menduduki jabatan pada organisasi atau lembaga nirlaba.

## Concurrent Positions of the Board of Commissioners

In accordance with the provisions of the Financial Services Authority Regulation No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks, the Board of Commissioners of Bank Sinarmas is permitted to hold concurrent positions by considering several things, namely:

1. Members of the Board of Commissioners serve as members of the Board of Directors, members of the Board of Commissioners, or Executive Officers who carry out supervisory functions in 1 non-bank Subsidiary Entity controlled by the Bank;
2. Non-Independent Commissioners carry out functional duties from the Bank's Shareholders in the form of legal entities in the Bank's business group; and/or
3. Members of the Board of Commissioners hold positions in non-profit organizations or institutions.

### Rangkap Jabatan Dewan Komisaris di Perusahaan Lain
**Concurrent Position of Board of Commissioners in Other Companies**

| Nama<br>Name | Jabatan di Bank Sinarmas<br>Positions at Bank Sinarmas | Perusahaan/Lembaga Lain<br>Other Companies/Institutions | | |
|---|---|---|---|---|
| | | Jabatan<br>Position | Institusi<br>Institution | Bidang Usaha<br>Line of Business |
| Tjendrawati Widjaja | Komisaris Utama<br>President Commissioner | Nihil<br>Nil | Nihil<br>Nil | Nihil<br>Nil |
| Sammy Kristamuljana | Komisaris Independen<br>Independent Commissioner | Nihil<br>Nil | Nihil<br>Nil | Nihil<br>Nil |
| Rusmin | Komisaris Independen<br>Independent Commissioner | Nihil<br>Nil | Nihil<br>Nil | Nihil<br>Nil |

### Rangkap Jabatan Dewan Komisaris dalam Komite Bank Sinarmas
**Concurrent Position of the Board of Commissioners in the Bank Sinarmas Committee**

| Nama<br>Name | Jabatan di Bank Sinarmas<br>Positions at Bank Sinarmas | Jabatan di Komite Bank Sinarmas<br>Position in the Committee ofBank Sinarmas |
|---|---|---|
| Tjendrawati Widjaja | Komisaris Utama<br>President Commissioner | - Anggota Komite Pemantau Risiko<br>- Anggota Komite Remunerasi dan Nominasi<br>- Member of the Risk Monitoring Committee<br>- Member of the Remuneration and Nomination Committee |
| Sammy Kristamuljana | Komisaris Independen<br>Independent Commissioner | - Ketua Komite Audit<br>- Ketua Komite Tata Kelola Terintegrasi<br>- Chairman of the Audit Committee<br>- Chairman of the Integrated Governance Committee |
| Rusmin | Komisaris Independen<br>Independent Commissioner | - Ketua Komite Pemantau Risiko<br>- Ketua Komite Remunerasi & Nominasi<br>- Chairman of the Risk Monitoring Committee<br>- Chairman of the Remuneration & Nomination Committee |



## Pengelolaan Benturan Kepentingan Dewan Komisaris [GRI 2-15]

Benturan kepentingan terjadi ketika kepentingan ekonomi Bank bertentangan dengan kepentingan ekonomis pribadi. Maka dari itu, setiap anggota Dewan Komisaris wajib:

1. Mengutamakan kepentingan Perseroan dan tidak mengurangi keuangan Perseroan dalam hal terjadi benturan kepentingan;
2. Menghindari diri dari pengambilan keputusan dalam situasi dan kondisi adanya benturan kepentingan;
3. Melakukan pengungkapan hubungan kekeluargaan, hubungan keuangan, hubungan kepengurusan, hubungan kepemilikan dengan Anggota Komisaris lain dan/atau anggota Direksi dan/atau Pemegang Saham pengendali bank dan atau pihak lainnya dalam rangka bisnis Perseroan; dan
4. Melakukan pengungkapan dalam hal pengambilan keputusan tetap harus diambil pada kondisi adanya benturan kepentingan.

## Orientasi bagi Dewan Komisaris

Bank Sinarmas menyelenggarakan program orientasi khusus bagi Dewan Komisaris yang baru diangkat dengan ketentuan sebagai berikut.

1. Program orientasi bagi anggota Dewan Komisaris yang baru bertujuan untuk memberikan arahan kepada anggota Dewan Komisaris baru agar memperoleh pemahaman tentang Bank sehingga dapat menunjang efektivitas pelaksanaan tugas dan tanggung jawabnya sebagai Dewan Komisaris.

## Management of Conflict of Interest of the Board of Commissioners [GRI 2-15]

A conflict of interest occurs when the Bank's economic interests conflict with personal economic interests. Therefore, each member of the Board of Commissioners must:

1. Prioritize the interests of the Company and not harm the Company's finances in the event of a conflict of interest;
2. Avoid making decisions in situations and conditions where there is a conflict of interest;
3. Disclosing familial relationships, financial relationships, management relationships, and ownership relationships with other Commissioners and/or members of the Board of Directors and/or controlling Shareholders of the Bank and/or other parties in the context of the Company's business; and
4. Disclosing in cases where decisions must still be taken in conditions where there is a conflict of interest.

## Orientation for the Board of Commissioners

Bank Sinarmas organizes a special orientation program for newly appointed Board of Commissioners with the following provisions.

1. The orientation program for new members of the Board of Commissioners aims to provide direction to new members of the Board of Commissioners to gain an understanding of the Bank, ensuring that they can support the effectiveness of carrying out their duties and responsibilities as Board of Commissioners.

2. Dalam program orientasi, Komisaris baru akan mendapat pengetahuan tentang Bank antara lain visi, misi, objektif jangka panjang, Rencana Bisnis Bank, Laporan Keuangan, Laporan Tahunan dan kebijakan-kebijakan terkait Dewan Komisaris.
3. Dokumen program orientasi dipersiapkan oleh *Corporate Secretary.*

Pada tahun 2024, program orientasi tidak diselenggarakan sehubungan dengan tidak terdapatnya anggota baik Dewan Komisaris baru.

2. In the orientation program, new Commissioners will gain knowledge about the Bank, including the vision, mission, long-term objectives, Bank Business Plan, Financial Statement, Annual Report, and policies related to the Board of Commissioners.
3. The orientation program document is prepared by the Corporate Secretary.

In 2024, the orientation program was not held due to the absence of new members of the Board of Commissioners.

## Sertifikasi Manajemen Risiko

Bank Sinarmas memastikan bahwa seluruh Dewan Komisaris telah mendapatkan Sertifikasi Manajemen Risiko sebagai syarat mengikuti fit and proper test, sesuai peraturan Otoritas Jasa Keuangan. Penyelenggaraan Penyegaran (refreshment) Sertifikasi Manajemen Risiko dilakukan terhitung sejak Sertifikat Manajemen Risiko terakhir diterbitkan.

Kebijakan refreshment juga ditetapkan oleh Surat Edaran Otoritas Jasa Keuangan Nomor 28/SEOJK.03/2022 tentang Sertifikasi Manajemen Risiko Bagi Sumber Daya Manusia Bank Umum. Regulasi ini menegaskan bahwa program refreshment 1 (satu) kali dalam 1 (satu) tahun. Program refreshment ini sekaligus memperpanjang masa berlaku sertifikasi manajemen risiko.

Informasi terkait *refreshment* yang telah diikuti Dewan Komisaris, diungkapkan pada tabel berikut.

## Risk Management Certification

Bank Sinarmas ensures that the entire Board of Commissioners has obtained Risk Management Certification as a requirement to participate in the fit and proper test, in accordance with the regulations of the Financial Services Authority. The implementation of Risk Management Certification refreshment is conducted since the last Risk Management Certificate was issued.

The refreshment policy is also stipulated by the Circular Letter of the Financial Services Authority Number 28/SEOJK.03/2022 concerning Risk Management Certification for Human Resources of Commercial Banks. This regulation confirms that the refreshment program is 1 (one) time in 1 (one) year. This refreshment program also extends the validity period of risk management certification.

Information related to the refreshment that has been followed by the Board of Commissioners is disclosed in the following table.

| Nama | Jabatan | Refreshment Terakhir | Tema Refreshment |
|---|---|---|---|
| Tjendrawati Widjaja | Komisaris Utama<br>President Commissioner | 3 November 2023<br>November 3, 2023 | *Strengthen 4 Pillar Risk Management Toward Sustainable Bank* |
| Sammy Kristamuljana | Komisaris Independen<br>Independent Commissioner | 1 Desember 2023<br>December 1, 2023 | *Accelerating Inclusive Digital Economy Transformation and Sustainability Economic Growth (and impact on Risk Based Bank Rating and Risk Appetite)* |
| Rusmin | Komisaris Independen<br>Independent Commissioner | 1 Desember 2023<br>December 1, 2023 | *Accelerating Inclusive Digital Economy Transformation and Sustainability Economic Growth (and impact on Risk Based Bank Rating and Risk Appetite)* |

## Mekanisme Pengunduran Diri dan Pemberhentian Dewan Komisaris

Sesuai Anggaran Dasar Bank Sinarmas yang mengatur mekanisme pengunduran diri dan pemberhentian Dewan Komisaris, jabatan Dewan Komisaris akan berakhir apabila:

1. Mengundurkan diri sesuai dengan ketentuan Anggaran Dasar;
2. Tidak lagi memenuhi persyaratan Peraturan Otoritas Jasa Keuangan dan Peraturan Perundang-undangan lainnya;
3. Meninggal dunia; dan
4. Diberhentikan berdasarkan keputusan RUPS.

## Resignation and Dismissal Mechanism of the Board of Commissioners

According to Bank Sinarmas' Articles of Association, which regulate the resignation and dismissal mechanism of the Board of Commissioners, the term of office of the Board of Commissioners will end if:

1. Resigns in accordance with the provisions of the Articles of Association;
2. No longer meets the requirements of the Financial Services Authority Regulations and other Laws and Regulations;
3. Deceased; and
4. Dismissed based on a resolution of the GMS.

## Fokus Pengawasan Dewan Komisaris Tahun 2024

Selama tahun 2024, fokus pengawasan Dewan Komisaris yang mencakup beberapa aspek penting, meliputi:

1. Menganalisis, memberi masukan, dan bersama sama Direksi menyetujui Rencana Bisnis Bank (RBB) termasuk melakukan pengkajian dan persetujuan perubahan RBB untuk disampaikan kepada OJK sesuai dengan waktu yang telah ditetapkan OJK.
2. Pengawasan terhadap pelaksanaan RBB yang dilaporkan kepada OJK secara berkala melalui laporan pengawasan RBB.
3. Memantau, menganalisis dan memberi masukan atas rencana strategis Bank.
4. Melakukan kajian secara berkala atas kinerja keuangan Bank, dalam setiap rapat Dewan Komisaris bersama Direksi dan/atau rapat komite-komitenya juga mengundang unit-unit bisnis untuk menyampaikan kinerja masing-masing.
5. Sejalan dengan regulasi yang berlaku, melakukan pengawasan aktif terhadap manajemen risiko, termasuk melakukan self-assessment tingkat Kesehatan Bank menggunakan Risk Based-Bank Rating (RBBR). Pada tahun 2024, melalui Komite Pemantau Risiko, memantau pengelolaan risiko, kualitas aktiva, status kesehatan Bank, dan hasil stress test serta kecukupan mengkaji kebijakan manajemen risiko Bank yang diwajibkan termasuk kebijakan Rencana Kontijensi Pendanaan, mengevaluasi kesesuaian antara kebijakan manajemen risiko dengan pelaksanaan kebijakan.
6. Memastikan bahwa Direksi telah menindaklanjuti temuan audit dan rekomendasi dari Satuan Kerja Audit Internal (SKAI), termasuk perbaikan terhadap hasil temuan pemeriksaan auditor eksternal maupun regulator.
7. Melakukan pengkajian atas: (i) laporan pengawasan setiap semester dan (ii) laporan assessment GCG, dan menyetujui beberapa kebijakan internal yang memerlukan persetujuan hingga tingkat Dewan Komisaris.
8. Memantau risiko operasional Bank yang meliputi kredit bermasalah (Non-Performing Loan – NPL), impaired loans, dan fraud.
9. Melakukan pengkajian dan persetujuan atas Recovery Plan dan Resolusi Plan yang telah disampaikan kepada OJK.
10. Pada tahun 2024, Dewan Komisaris telah memberikan persetujuan atas rekomendasi Komite Nominasi dan Remunerasi untuk disampaikan kepada RUPS yaitu pengangkatan Sdri. Amandalia Johanes sebagai Direktur Perseroan.
11. Terkait Sumber Daya Manusia (SDM), Dewan Komisaris melalui Komite Nominasi dan Remunerasi memantau kebijakan manpower dan fungsi manajemen SDM yang mengandung risiko serta berdampak signifikan pada Bank, dan melakukan pengawasan dalam penerapan manajemen risiko terkait alih daya.
12. Melalui Komite Audit melakukan reviu atas laporan keuangan mencakup penyajian laporan keuangan, perlakuan akuntansi dan kesesuaiannya dengan prinsip

## Focus of Supervision of the Board of Commissioners in 2024

In 2024, the focus of supervision of the Board of Commissioners covers several important aspects, including:

1. Analyze, provide input, and, together with the Board of Directors, approve the Bank's Business Plan (RBB), including conducting a review and approval of changes to the RBB to be submitted to the OJK in accordance with the time set by the OJK.
2. Supervision of the implementation of the RBB, which is reported to the OJK periodically through the RBB supervision report.
3. Monitor, analyze, and provide input on the Bank's strategic plan.
4. Conducting periodic reviews of the Bank's financial performance in every meeting of the Board of Commissioners together with the Board of Directors and/or meetings of its committees, also inviting business units to submit their respective performances.
5. In line with applicable regulations, conducting active supervision of risk management, including conducting self-assessment of the Bank's Soundness level using the Risk-Based Bank Rating (RBBR). In 2024, through the Risk Monitoring Committee, monitor risk management, asset quality, Bank health status, and stress test results and the adequacy of reviewing the Bank's required risk management policies, including the Funding Contingency Plan policy, and evaluate the suitability between risk management policies and policy implementation.
6. Ensure that the Board of Directors has followed up on audit findings and recommendations from the Internal Audit Work Unit (SKAI), including improvements to the results of external auditor and regulator audit findings.
7. Conduct reviews of (i) supervisory reports every semester and (ii) GCG assessment reports, and approve several internal policies that require approval up to the Board of Commissioners level.
8. Monitor the Bank's operational risks, including non-performing loans (NPL), impaired loans, and fraud.
9. Conduct reviews and approvals of the Recovery Plan and Resolution Plan that have been submitted to the OJK.
10. In 2024, the Board of Commissioners approved the recommendation of the Nomination and Remuneration Committee to be submitted to the GMS, namely the appointment of Ms. Amandalia Johanes as Director of the Company.
11. Regarding Human Resources (HR), the Board of Commissioners, through the Nomination and Remuneration Committee, monitors manpower policies and HR management functions that contain risks and have a significant impact on the Bank and supervises the implementation of risk management related to outsourcing.
12. Through the Audit Committee, reviewing financial statements includes presentation of financial statements, accounting treatment and its conformity with generally

akuntansi yang berlaku umum, reviu ataslaporan publikasi dan pelaporan kepada otoritas, serta melakukan evaluasi atas pelaksanaan fungsi kepatuhan di Bank.

13. Fungsi pengawasan risiko telah dijalankan melalui Komite Pemantau Risiko yang memberikan rekomendasi kepada Dewan Komisaris dalam rangka mendukung efektivitas pelaksanaan tugas dan tanggung jawab Dewan Komisaris yang berkaitan dengan manajemen risiko.
14. Melakukan fungsi pengawasan dan penerapan Tata Kelola Terintegrasi (TKT) dalam Konglomerasi Keuangan Sinar Mas melalui Komite TKT, di antaranya mengevaluasi pelaksanaan TKT melalui penilaian kecukupan pengendalian intern dan pelaksanaan fungsi kepatuhan secara terintegrasi.
15. Menganalisis, memberi masukan, dan menyetujui Rencana Aksi Keuangan Berkelanjutan (RAKB) tahun 2025 dan realisasi RAKB tahun 2024 untuk disampaikan kepada OJK.

## Rekomendasi Dewan Komisaris

Rekomendasi penting yang telah dikeluarkan Dewan Komisaris selama tahun 2024, antara lain:

1. Memberi masukan dan menyetujui rencana Aksi Korporasi sepanjang 2024 di antaranya penyelenggaraan RUPS Tahunan dan RUPS Luar Biasa.
2. Memberikan persetujuan atas perubahan RBB tahun 2024, Recovery Plan tahun 2025, RAKB tahun 2025 dan realisasi RAKB tahun 2024 serta memberikan persetujuan atas rencana strategi dan bisnis Bank untuk tahun 2025.
3. Melakukan reviu dan memberikan masukan atas Risk Appetite Statement Bank.
4. Memberikan masukan mengenai target keuangan Bank, termasuk Net Interest Margin, NPL dan Watchlist Account, Loan to Deposit Ratio, Asset Quality, produktivitas dan kompetisi pasar.
5. Secara berkala membahas kondisi makro ekonomi dan industri serta peraturan-peraturan ketentuan perbankan baru, serta dampak terhadap bisnis Bank dan tindak lanjutnya.
6. Memberikan rekomendasi kepada Direksi melalui komite-komite di tingkat Dewan Komisaris sebagaimana tercantum dalam Laporan Pelaksanaan Tugas Komite Audit, Komite Pemantau Risiko, Komite Nominasi dan Remunerasi, serta Komite Tata Kelola Terintegrasi pada Bab Laporan Tata Kelola Perusahaan pada Laporan Tahunan ini.
7. Sesuai Anggaran Dasar Bank, Dewan Komisaris menyetujui usulan tindakan kredit kurang lancar, restrukturisasi dan penghapusan kredit di atas limit tertentu sebagaimana ditetapkan dalam kebijakan Bank. Selain itu, Dewan Komisaris memberikan persetujuan kredit terhadap pihak terkait dengan Bank, hal ini sesuai dengan ketentuan otoritas yang berlaku.

accepted accounting principles, reviewing published reports and reporting to authorities, and evaluating the implementation of compliance functions in the Bank.

13. The risk monitoring function has been carried out through the Risk Monitoring Committee, which provides recommendations to the Board of Commissioners in order to support the effectiveness of the implementation of the Board of Commissioners' duties and responsibilities related to risk management.
14. Carrying out the function of supervision and implementation of Integrated Governance (IGC) in the Sinar Mas Financial Conglomerate through the IGC Committee, including evaluating the implementation of IGC through an assessment of the adequacy of internal control and the implementation of integrated compliance functions.
15. Analyzing, providing input, and approving the 2025 Sustainable Finance Action Plan (RAKB) and the realization of the 2024 RAKB to be submitted to the OJK.

## Recommendations from the Board of Commissioners

Important recommendations issued by the Board of Commissioners during 2024 include:

1. Providing input and approving the Corporate Action plan throughout 2024, including the holding of the Annual GMS and Extraordinary GMS.
2. Provide approval for changes to the 2024 RBB, 2025 Recovery Plan, 2025 RAKB, and the realization of the 2024 RAKB, and provide approval for the Bank's strategic and business plan for 2025.
3. Review and provide input on the Bank's Risk Appetite Statement.
4. Provide input on the Bank's financial targets, including Net Interest Margin, NPL and Watchlist Account, Loan-to-Deposit Ratio, Asset Quality, productivity, and market competition.
5. Periodically discuss macroeconomic and industrial conditions and new banking regulations, as well as the impact on the Bank's business and its follow-up.
6. Provide recommendations to the Board of Directors through committees at the Board of Commissioners level as stated in the Report on the Implementation of the Duties of the Audit Committee, Risk Monitoring Committee, Nomination and Remuneration Committee, and Integrated Governance Committee in the Corporate Governance Report Chapter of this Annual Report.
7. In accordance with the Bank's Articles of Association, the Board of Commissioners approves the proposed actions for substandard loan, restructuring, and writing off loan above a certain limit as stipulated in the Bank's policies. In addition, the Board of Commissioners provides loan approval to parties related to the Bank in accordance with the provisions of the applicable authorities.

## Pengembangan Kompetensi Dewan Komisaris

### Kebijakan

Bank Sinarmas telah memiliki kebijakan untuk memfasilitasi Dewan Komisaris mengikuti berbagai program pengembangan kompetensi. Langkah ini dilakukan guna memastikan Dewan Komisaris memiliki kompetensi yang diperlukan untuk menjalankan peran dan fungsinya secara efektif dalam mendukung kesuksesan dan keberlanjutan Bank.

### Realisasi Pelatihan

Informasi mengenai program pengembangan kompetensi Dewan Komisaris pada tahun 2024 diungkapkan sebagai berikut.

## Board of Commissioners Competency Development

### Policy

Bank Sinarmas has a policy to facilitate the Board of Commissioners' participation in various competency development programs. This step is taken to ensure that the Board of Commissioners has the competencies needed to carry out its roles and functions effectively in supporting the success and sustainability of the Bank.

### Training Realization

Information regarding the Board of Commissioners competency development program in 2024 is disclosed as follows:

| Nama<br>Name | Jabatan<br>Position | Materi Pengembangan Kompetensi<br>Competency Development Materials | Tempat/Tanggal<br>Venue/Date | Penyelenggara<br>Organizer |
|---|---|---|---|---|
| Tjendrawati Widjaja | Komisaris Utama<br>President Commissioner | Permohonan Persetujuan Dewan Komisaris Terkait Pembukaan Fasilitas Money Market Line - Non BMPK Kepada PT Bank Nano Syariah<br>Request for Approval from the Board of Commissioners Regarding the Opening of Money Market Line Facilities - Non BMPK to PT Bank Nano Syariah | Grand Hyatt Hotel, Ballroom B & C, Jalan M.H. Thamrin, Jakarta<br>6 Maret 2024<br>Grand Hyatt Hotel, Ballroom B & C, Jalan M.H. Thamrin, Jakarta<br>March 6, 2024 | IBM |
| | | Seminar Penyelarasan Manajemen Risiko bagi Komisaris<br>Risk Management Alignment Seminar for Commissioners | Mandiri Club<br>21-22 Mei 2024<br>Mandiri Club<br>May 21-22, 2024 | BARA (Bankers Association for Risk Management) |
| | | Kegiatan Edukasi Keuangan - BUNDAKU (Ibu, Anak, dan Keluarga Cakap Keuangan) "Ibu Cerdas Keuangan, Mewujudkan Keluarga Sejahtera"<br>Financial Education Activities - BUNDAKU (Financially Savvy Mothers, Children, and Families) "Financially Savvy Mothers, Creating Prosperous Families" | Via online<br>25 Juni 2024<br>Via online<br>June 25, 2024 | OJK (Otoritas Jasa Keuangan)<br>OJK (Financial Services Authority) |
| Sammy Kristamuljana | Komisaris Independen<br>Independent Commissioner | Corporate Strategy Masterclass: Intersection of Corporate Strategy and Competitive Strategy | Via online<br>20 Maret 2024<br>Via online<br>March 20, 2024 | SMS (Strategic Management Society), USA |
| | | Corporate Business Education Reimagined with Ithai Stern | Via online<br>7 Mei 2024<br>Via online<br>May 7, 2024 | SMS (Strategic Management Society), USA |
| | | Seminar Penyelarasan Manajemen Risiko bagi Komisaris<br>Risk Management Alignment Seminar for Commissioners | Mandiri Club<br>21-22 Mei 2024<br>Mandiri Club<br>May 21-22, 2024 | BARA (Bankers Association for Risk Management) |
| | | Masterclass on Adaptation with Daniel Levinthal: The Mendelian Executive and Adaptive Journeys | Via online<br>12 Juni 2024<br>Via online<br>June 12, 2024 | SMS (Strategic Management Society), USA |
| | | Financial Institution Recovery Plan in the Integrated Risk Management Framework for Financial Conglomeration | The Grand Mansion<br>28 November 2024<br>The Grand Mansion<br>November 28, 2024 | M-Knows Consulting |

| Nama<br>Name | Jabatan<br>Position | Materi Pengembangan Kompetensi<br>Competency Development Materials | Tempat/Tanggal<br>Venue/Date | Penyelenggara<br>Organizer |
|---|---|---|---|---|
| | | The Profession's Ethical Standards and Guidelines | Via online<br>18 Maret 2024<br>Via online<br>March 18, 2024 | AIA (The Association of International Accountants) |
| | | Paylater: Solusi Keuangan atau Sumber Masalah Baru?<br>Paylater: Financial Solution or New Source of Problems? | Via online<br>26 April 2024<br>Via online<br>April 26, 2024 | LPPI (Lembaga Pengembangan Perbankan Indonesia)<br>LPPI (Indonesian Banking Development Institute) |
| | | Capital Allowance - Full Expensing got Fuller | Via online<br>29 April 2024<br>Via online<br>April 29, 2024 | AIA (The Association of International Accountants) |
| | | Sustainable Financing Criteria - for Corporate, SMEs and Financial Institutions | Via online<br>11 Juni 2024<br>Via online<br>June 11, 2024 | AIA (The Association of International Accountants) |
| | | Seminar Penyelarasan Manajemen Risiko bagi Komisaris<br>Risk Management Alignment Seminar for Commissioners | Ruang Asmat, Mandiri Club Jakarta Selatan<br>21-23 Agustus 2024<br>Asmat Room, Mandiri Club, South Jakarta<br>August 21-23, 2024 | BARA (Bankers Association for Risk Management) |
| Rusmin | Komisaris Independen<br>Independent Commissioner | Key Audit Matters: Matters To All | Via online<br>12 September 2024<br>Via online<br>September 12, 2024 | Profesi Keuangan Expo 2024<br>Finance Professions Expo 2024 |
| | | Carbon Credit: Bagaimana Profesi Keuangan Memanfaatkan Tantangan dan Peluangnya<br>Carbon Credits: How the Finance Profession Can Leverage the Challenges and Opportunities | Via online | Profesi Keuangan Expo 2024<br>Finance Professions Expo 2024 |
| | | Implementasi PSAK 117: Pemahaman, Implementasi dan Dampaknya terhadap Bisnis<br>Implementation of PSAK 117: Understanding, Implementation and Impact on Business | Via online | Profesi Keuangan Expo 2024<br>Finance Professions Expo 2024 |
| | | Transformasi dan Integrasi Sistem Logistik Indonesia<br>Transformation and Integration of Indonesian Logistics System | Via online | Profesi Keuangan Expo 2024<br>Finance Professions Expo 2024 |
| | | Dampak Penerapan UU PDP Pada Industri Keuangan dalam Mengelola Data Konsumen dan Praktik GCG<br>The Impact of the Implementation of the PDP Law on the Financial Industry in Managing Consumer Data and GCG Practices | Via online | LPPI (Lembaga Pengembangan Perbankan Indonesia)<br>LPPI (Indonesian Banking Development Institute) |

## Penilaian Komite di Bawah Dewan Komisaris

### Prosedur Penilaian

Dewan Komisaris senantiasa melakukan penilaian terhadap kinerja kepada organ pendukungnya, yakni Komite Audit, Komite Pemantau Risiko, Komite Remunerasi dan Nominasi, dan Komite Tata Kelola Terintegrasi. Penilaian dilakukan secara berkala setiap tahun.

Prosedur penilaian komite dilakukan secara mandiri (*self assessment*), tanpa melibatkan pihak ketiga. Penilaian tersebut diharapkan menjadi masukan untuk peningkatan kinerja ke depan.

## Assessment of Committees Under the Board of Commissioners

### Assessment Procedure

The Board of Commissioners always assesses the performance of its supporting organs, namely the Audit Committee, Risk Monitoring Committee, Remuneration and Nomination Committee, and Integrated Governance Committee. Assessments are carried out periodically every year.

The committee assessment procedure is carried out independently (self-assessment), without involving third parties. The assessment is expected to be input for improving future performance.

**Kriteria Penilaian**

Kriteria yang digunakan dalam penilaian tersebut, yakni:

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

**Hasil Penilaian**

Berdasarkan hasil penilaian ditahun 2024, Dewan Komisaris menyatakan bahwa komite-komite telah menjalankan tugas dan tanggung jawabnya dengan baik dan telah berkontribusi dalam mendukung pelaksanaan tugas dan tanggung jawab Dewan Komisaris.

## Komisaris Independen

Komisaris Independen di Bank Sinarmas ditunjuk untuk memberikan perspektif yang obyektif dan tidak bias dalam pengambilan keputusan Bank. Pada tahun 2024, dari jumlah 3 anggota Dewan Komisaris, 2 di antaranya Komisaris Independen. Dengan demikian, Bank telah memenuhi ketentuan Peraturan Otoritas Jasa Keuangan No. 17 tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum yang mewajibkan minimal 50% Komisaris Independen dari jumlah anggota Dewan Komisaris.

**Pernyataan Independensi Komisaris Independen**

Sammy Kristamuljana dan Rusmin telah menyampaikan pernyataan independensi sebagai Komisaris Independen. Pernyataan independensi tersebut terkait dengan pengangkatannya sebagai Komisaris Independen yang telah menjabat lebih dari 2 (dua) periode.

Uraian pernyataan independensi tersebut diungkapkan sebagai berikut.

**Assessment Criteria**

The criteria used in the assessment are:

1. Implementation of duties and responsibilities during 2024;
2. Recommendations given; and
3. Level of attendance at each committee meeting.

**Assessment Results**

Based on the assessment results in 2024, the Board of Commissioners stated that the committees had carried out their duties and responsibilities well and had contributed to supporting the implementation of the duties and responsibilities of the Board of Commissioners.

## Independent Commissioners

Independent Commissioners at Bank Sinarmas are appointed to provide an objective and unbiased perspective in the Bank's decision-making. In 2024, out of 3 members of the Board of Commissioners, 2 of them are Independent Commissioners. Thus, the Bank has complied with the provisions of the Financial Services Authority Regulation No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks, which requires a minimum of 50% Independent Commissioners from the total number of members of the Board of Commissioners.

**Independence Statement of Independent Commissioner**

Sammy Kristamuljana and Rusmin submitted a statement of independence as Independent Commissioners. The statement of independence is related to their appointment as Independent Commissioners who have served for more than 2 (two) terms.

The description of the statement of independence is disclosed as follows.

| Aspek Independensi<br>Independence Aspect | Sammy Kristamuljana | Rusmin |
|---|---|---|
| Merupakan pihak independen terhadap pemilik Bank dan Pemegang Saham Pengendali (PSP).<br>It is an independent party to the Bank's owners and Controlling Shareholders (PSP). | √ | √ |
| Tidak mempunyai saham baik langsung maupun tidak langsung pada Bank.<br>Does not have shares either directly or indirectly in the Bank. | √ | √ |
| Tidak mempunyai hubungan afiliasi dengan Bank, anggota Dewan Komisaris, anggota Direksi atau Pemegang Saham Utama Bank.<br>Does not have an affiliated relationship with the Bank, members of the Board of Commissioners, members of the Board of Directors, or Major Shareholders of the Bank. | √ | √ |
| Tidak mempunyai hubungan usaha baik langsung maupun tidak langsung yang berkaitan dengan kegiatan usaha Bank.<br>Does not have a business relationship either directly or indirectly related to the Bank's business activities. | √ | √ |
| Merupakan pihak independen terhadap pemilik Bank dan Pemegang Saham Pengendali (PSP).<br>It is an independent party to the Bank's owners and Controlling Shareholders (PSP). | √ | √ |
| Tidak mempunyai saham baik langsung maupun tidak langsung pada Bank.<br>Does not have shares either directly or indirectly in the Bank. | √ | √ |
| Tidak mempunyai hubungan afiliasi dengan Bank, anggota Dewan Komisaris, anggota Direksi atau Pemegang Saham Utama Bank.<br>Does not have an affiliated relationship with the Bank, members of the Board of Commissioners, members of the Board of Directors, or Major Shareholders of the Bank. | √ | √ |
| Tidak mempunyai hubungan usaha baik langsung maupun tidak langsung yang berkaitan dengan kegiatan usaha Bank.<br>Does not have a business relationship either directly or indirectly related to the Bank's business activities. | √ | √ |

# DIREKSI
## Board of Directors

Direksi merupakan organ yang bertanggung jawab penuh atas pengelolaan Bank. Masing-masing anggota Direksi memiliki tugas dan tanggung jawab dengan koordinasi terpusat di tangan Direktur Utama, sehingga setiap keputusan wajib dipertanggung jawabkan secara kolektif oleh seluruh anggota Direksi dan keputusan terakhir berada di tangan Direktur Utama. Direksi juga bekerja sesuai dengan kebijakan dan tujuan yang ditetapkan Pemegang Saham pada saat RUPS.

### Pedoman Direksi

Bank telah menyusun Pedoman Direksi yang ditetapkan melalui SK.045/2018/PRESDIR-CorSec tanggal 25 Oktober 2018. Isi pedoman tersebut, terdiri dari:

1. Ketentuan Umum;
2. Landasan Hukum;
3. Keanggotaan;
4. Kriteria;
5. Masa Jabatan;
6. Ketentuan Rangkap Jabatan;
7. Pengunduran dan Pemberhentian Sementara Direksi;
8. Benturan Kepentingan;
9. Deskripsi Tugas dan Tanggung Jawab Secara Umum;
10. Wewenang;
11. Larangan;
12. Nilai-nilai;
13. Orientasi Direksi;
14. Pelatihan Direksi;
15. Keikutsertaan Saham;
16. Pelaporan; dan
17. Lain-lain.

### Tata Tertib Kerja Direksi

Direksi juga memiliki tata tertib yang memuat berbagai aspek terkait prosedur, kewajiban, dan tanggung jawab anggota Direksi dalam menjalankan tugasnya. Tata tertib tersebut diatur dalam Surat Keputusan No. SK.076/2024/PRESDIR tertanggal 28 Oktober 2024. Beberapa ketentuan yang tercantum dalam Tata Tertib Direksi, antara lain:

1. Waktu Kerja;
2. Perjalanan Dinas dan Cuti Direksi ;
3. Rapat;
4. Ketentuan Pakaian;
5. Kepatuhan terhadap Peraturan;
6. Keterbukaan Informasi; dan
7. Kode Etik.

The Board of Directors is an organ that is fully responsible for the management of the Bank. Each member of the Board of Directors has duties and responsibilities, with centralized coordination in the hands of the President Director, ensuring that every decision must be collectively accounted for by all members of the Board of Directors and the final decision lies with the President Director. The Board of Directors also works in accordance with the policies and objectives set by Shareholders at the GMS.

### Board of Directors Guidelines

The Bank has prepared Board of Directors Guidelines, which are stipulated through SK.045/2018/PRESDIR-CorSec dated October 25, 2018. The contents of the guidelines consist of:

1. General Provisions;
2. Legal Basis;
3. Membership;
4. Criteria;
5. Term of Office;
6. Provisions on Concurrent Positions;
7. Resignation and Temporary Dismissal of Directors;
8. Conflict of Interest;
9. General Description of Duties and Responsibilities;
10. Authority;
11. Prohibitions;
12. Values;
13. Orientation of the Board of Directors;
14. Training of the Board of Directors ;
15. Share Participation;
16. Reporting; and
17. Others.

### Charter of Board of Directors

The Board of Directors also has a charter that contains various aspects related to the procedures, obligations, and responsibilities of members of the Board of Directors in carrying out their duties. These rules are regulated in Decree No. SK.076/2024/PRESDIR dated October 28, 2024. Several provisions contained in the Board of Directors Charter include:

1. Working Hours;
2. Board of Directors' Official Travel and Leave;
3. Meetings;
4. Clothing Provisions;
5. Compliance with Regulations;
6. Disclosure of Information; and
7. Code of Ethics.

## Tugas dan Tanggung Jawab Direksi

Tugas dan tanggung jawab Direksi berdasarkan pedoman kerja, yakni:

1. Direksi bertanggung jawab penuh atas pelaksanaan kepengurusan Bank;
2. Direksi wajib mengelola Bank sesuai dengan kewenangan dan tanggung jawabnya sebagaimana diatur dalam Anggaran Dasar dan peraturan perundang-undangan;
3. Direksi wajib melaksanakan prinsip-prinsip tata kelola perusahaan dalam setiap kegiatan usaha Bank pada seluruh tingkatan atau jenjang organisasi;
4. Direksi bertanggung jawab dalam menciptakan struktur pengendalian intern dan menjamin terselenggaranya Fungsi Audit Internal Bank dalam setiap tingkatan manajemen;
5. Dalam pelaksanaan Fungsi Audit Internal, Direksi bertanggung jawab:
   a. Mengembangkan kerangka pengendalian intern untuk mengidentifikasi, mengukur, memantau, dan mengendalikan semua risiko yang dihadapi Bank;
   b. Memastikan SKAI memperoleh informasi terkait perkembangan yang terjadi, inisiatif, proyek, produk, dan perubahan operasional serta risiko yang telah diidentifikasi dan diantisipasi;
   c. Memastikan telah dilakukan tindakan perbaikan yang tepat dalam waktu yang cepat terhadap semua temuan dan rekomendasi SKAI;
   d. Memastikan kepala SKAI memiliki sumber daya serta anggaran yang diperlukan untuk menjalankan tugas dan fungsi sesuai dengan rencana audit tahunan;
6. Direksi wajib menindaklanjuti temuan audit dan rekomendasi dari satuan kerja audit internal Bank, auditor ekstern, hasil pengawasan Otoritas Jasa Keuangan dan/atau hasil pengawasan otoritas lain;
7. Direksi bertanggung jawab terhadap *non-performing loan* (NPL) Bank;
8. Dalam rangka menerapkan prinsip Tata Kelola yang baik, Direksi paling sedikit wajib membentuk:
   a. Satuan Kerja Audit Internal;
   b. *Risk Management Group* dan Komite Manajemen Risiko;
   c. Satuan Kerja Kepatuhan;
9. Direksi wajib mempertanggungjawabkan pelaksanaan tugas kepada Pemegang Saham melalui RUPS;
10. Direksi wajib mengungkapkan kepada pegawai mengenai kebijakan Bank yang bersifat strategis di bidang kepegawaian;
11. Direksi wajib menyediakan data dan informasi yang akurat, relevan dan tepat waktu kepada Dewan Komisaris;
12. Keputusan Direksi yang diambil sesuai dengan pedoman dan tata tertib kerja mengikat dan menjadi tanggung jawab seluruh anggota Direksi;
13. Direksi wajib:

## Duties and Responsibilities of the Board of Directors

The duties and responsibilities of the Board of Directors are based on the work guidelines, namely:

1. The Board of Directors is fully responsible for the implementation of the Bank's management;
2. The Board of Directors is obliged to manage the Bank in accordance with its authority and responsibilities as stipulated in the Articles of Association and laws and regulations;
3. The Board of Directors is obliged to implement the principles of corporate governance in every business activity of the Bank at all levels of the organization;
4. The Board of Directors is responsible for creating an internal control structure and ensuring the implementation of the Bank's Internal Audit Function at every level of management;
5. In implementing the Internal Audit Function, the Board of Directors is responsible for:
   a. Developing an internal control framework to identify, measure, monitor, and control all risks faced by the Bank;
   b. Ensuring that SKAI obtains information related to developments that occur, initiatives, projects, products, and operational changes, as well as risks that have been identified and anticipated;
   c. Ensuring that appropriate corrective actions have been taken in a timely manner regarding all SKAI findings and recommendations;
   d. Ensuring that the Head of SKAI has the resources and budget needed to carry out duties and functions in accordance with the annual audit plan;
6. The Board of Directors is required to follow up on audit findings and recommendations from the Bank's internal audit work unit, external auditors, the results of supervision by the Financial Services Authority, and/or the results of supervision by other authorities;
7. The Board of Directors is responsible for the Bank's non-performing loans (NPL);
8. In order to implement the principles of Good Governance, the Board of Directors must at least form:
   a. Internal Audit Work Unit;
   b. Risk Management Group and Risk Management Committee;
   c. Compliance Work Unit;
9. The Board of Directors is required to be accountable for the implementation of its duties to Shareholders through the GMS;
10. The Board of Directors is required to disclose to employees the Bank's strategic policies in the field of personnel;
11. The Board of Directors is required to provide accurate, relevant and timely data and information to the Board of Commissioners;
12. Decisions of the Board of Directors taken in accordance with the guidelines and charter are binding and are the responsibility of all members of the Board of Directors;

a. Membuat daftar Pemegang Saham, daftar khusus, risalah RUPS dan risalah rapat Direksi;
b. Membuat laporan tahunan dan dokumen keuangan Perseroan sebagaimana dimaksud dalam Undang-Undang tentang Dokumen Perusahaan;
c. Memelihara seluruh daftar, risalah, dokumen keuangan Bank dan dokumen Bank lainnya;

14. Anggota Direksi wajib melaporkan kepada Perseroan mengenai saham yang dimiliki anggota Direksi yang bersangkutan dan/atau keluarganya dalam Perseroan;

15. Merumuskan, menyusun, mensosialisasikan, mengevaluasi visi, misi, etos kerja, dan nilai perusahaan;
16. Seluruh kebijakan tertulis Bank, baik dalam bentuk surat keputusan ("SK") maupun surat edaran ("SE"), wajib disetujui dan ditandatangani oleh anggota Direksi sesuai dengan ketentuan internal perseroan beserta perubahannya;
17. Mengoordinasikan perumusan dan penyusunan strategi perusahaan baik jangka panjang (*Corporate Plan*) maupun jangka menengah/pendek (Rencana Bisnis Bank/RBB) serta mengusulkannya guna mendapatkan persetujuan dari Dewan Komisaris;
18. Mengoordinasikan perumusan dan pelaksanaan strategi program Penerapan Keuangan Berkelanjutan dengan memperhatikan pemenuhan ketentuan kehati-hatian dan penerapan manajemen risiko;
19. Melaksanakan, mengawasi, dan mengevaluasi jalannya *Corporate Plan* dan RBB agar sesuai dengan Visi, Misi, dan Objektif Bank yang telah ditetapkan;

20. Menetapkan besarnya gaji atau remunerasi kepada karyawan dan/atau pejabat eksekutif unit kerja di bawahnya dengan memperhatikan rekomendasi Direktur yang membawahkan *Human Capital* (HC);
21. Mengatur dan menetapkan struktur organisasi, pendelegasian wewenang dan uraian tugas yang jelas bagi setiap pejabat maupun pegawai, baik di kantor pusat maupun di kantor-kantor cabang;
22. Pengalihan tugas sementara anggota Direksi dapat dilakukan dengan ketentuan:
    a. Apabila Direktur Utama cuti atau berhalangan hadir maka tugas-tugas Direktur Utama dilaksanakan secara bersama-sama oleh 2 orang Direktur lainnya sebagaimana diatur dalam Anggaran Dasar Perusahaan;
    b. Direktur lainnya sebagaimana dijelaskan dalam huruf (a) merupakan Direktur *Alternate* adalah Direktur yang menerima pengalihan tugas sementara Direktur dikarenakan cuti/berhalangan hadir oleh sebab apa pun yang tidak perlu dibuktikan kepada pihak ketiga sebagaimana diatur dalam ketentuan internal yang berlaku; dan
    c. Selain Direktur *Alternate* juga terdapat piket harian Direksi yang mana masing-masing Direktur tertentu harus selalu berada di kantor pada hari kerja dan standby pada hari-hari tertentu sesuai dengan jadwal yang telah disepakati sebagaimana diatur dalam ketentuan internal yang berlaku.

13. The Board of Directors is required to:
    a. Create a list of Shareholders, a special list, minutes of the GMS and minutes of the Board of Directors' meetings;
    b. Create annual reports and financial documents of the Company as referred to in the Law on Company Documents;
    c. Maintain all lists, minutes, financial documents of the Bank and other Bank documents;
14. Members of the Board of Directors are required to report to the Company regarding shares owned by the relevant member of the Board of Directors and/or his/her family in the Company;
15. Formulate, compile, socialize, and evaluate the vision, mission, work ethic, and values of the company;
16. All written policies of the Bank, both in the form of decrees ("SK") and circulars ("SE"), must be approved and signed by members of the Board of Directors in accordance with the company's internal provisions and their amendments;
17. Coordinate the formulation and preparation of the company's strategies, both long-term (Corporate Plan) and medium/short-term (Bank Business Plan/RBB), and propose them to obtain approval from the Board of Commissioners;
18. Coordinate the formulation and implementation of Sustainable Finance Implementation program strategies by paying attention to the fulfillment of prudential provisions and the implementation of risk management;
19. Implement, supervise, and evaluate the implementation of the Corporate Plan and RBB to ensure that they are in accordance with the Bank's Vision, Mission, and Objectives that have been set;
20. Determine the amount of salary or remuneration to employees and/or executive officers of work units under it by considering the recommendations of the Director in charge of Human Capital (HC);
21. Arrange and determine the organizational structure, delegation of authority, and clear job descriptions for each official and employee, both at the head office and at branch offices;
22. Temporary transfer of duties of members of the Board of Directors can be carried out with the following provisions:
    a. If the President Director is on leave or is unable to attend, the duties of the President Director are carried out jointly by 2 other Directors as stipulated in the Company's Articles of Association;
    b. The other Director as explained in letter (a), is the Alternate Director, namely the Director who receives the temporary transfer of duties of the Director due to leave/being unable to attend for any reason that does not need to be proven to a third party as stipulated in the applicable internal provisions; and
    c. In addition to the Alternate Director, there is also a daily duty of the Board of Directors, where each Director must always be in the office on working days and be on standby on certain days according to the agreed schedule as stipulated in the applicable internal provisions.

## Kriteria Anggota Direksi

Kriteria keanggotaan Direksi Bank Sinarmas, yakni:

1. Anggota Direksi diangkat dan diberhentikan oleh RUPS;

2. Setiap usulan penggantian dan/atau pengangkatan anggota Direksi oleh Dewan Komisaris kepada Rapat Umum Pemegang Saham, harus memperhatikan rekomendasi komite remunerasi dan nominasi;

3. Yang dapat menjadi anggota Direksi adalah orang perseorangan yang memenuhi persyaratan pada saat diangkat dan selama menjabat:

    a. Mempunyai akhlak, moral dan integritas yang baik;
    b. Cakap melakukan perbuatan hukum;
    c. Dalam 5 tahun sebelum pengangkatan dan selama menjabat:
        1) Tidak pernah dinyatakan pailit;
        2) Tidak pernah menjadi anggota Direksi dan/atau Dewan Komisaris yang dinyatakan bersalah menyebabkan suatu perusahaan dinyatakan pailit;
        3) Tidak pernah dihukum karena melakukan tindak pidana yang merugikan keuangan negara dan/atau yang berkaitan dengan sektor keuangan;
        4) Tidak pernah menjadi anggota Direksi dan/atau anggota Dewan Komisaris yang selama menjabat:
            a) Pernah tidak menyelenggarakan RUPS tahunan;
            b) Pertanggungjawabannya sebagai anggota Direksi dan/atau anggota Dewan Komisaris pernah tidak diterima oleh RUPS atau pernah tidak memberikan pertanggungjawaban sebagai anggota Direksi dan/atau anggota Dewan Komisaris kepada RUPS;
            c) Pernah menyebabkan perusahaan yang memperoleh izin, persetujuan atau pendaftaran dari Otoritas Jasa Keuangan tidak memenuhi kewajiban menyampaikan laporan tahunan dan/atau laporan keuangan kepada Otoritas Jasa Keuangan;
4. Memiliki komitmen untuk mematuhi peraturan perundang-undangan; dan
5. Memiliki pengetahuan dan/atau keahlian di bidang yang dibutuhkan Emiten atau Perusahaan Publik.

Pemenuhan persyaratan tersebut wajib dimuat dalam surat pernyataan dan disampaikan kepada Bank. Selanjutnya, Bank wajib meneliti dan mendokumentasikannya. Rincian penilaian kepatutan tersebut akan dijelaskan di bagian komposisi Direksi.

## Criteria for Members of the Board of Directors

The criteria for membership of the Board of Directors of Bank Sinarmas are:

1. Members of the Board of Directors are appointed and dismissed by the GMS;
2. Every proposal for replacement and/or appointment of members of the Board of Directors by the Board of Commissioners to the General Meeting of Shareholders must take into account the recommendations of the remuneration and nomination committee;
3. Those who can become members of the Board of Directors are individuals who meet the following requirements at the time of appointment and during their term of office:
    a. Have good morals, ethics, and integrity;
    b. Capable of carrying out legal acts;
    c. In the 5 years prior to appointment and during their term of office:
        1) Has never been declared bankrupt;
        2) Has never been a member of the Board of Directors and/or Board of Commissioners who was found guilty of causing a company to be declared bankrupt;
        3) Has never been convicted of committing a crime that is detrimental to state finances and/or related to the financial sector;
        4) Has never been a member of the Board of Directors and/or a member of the Board of Commissioners who during their term of office:
            a) Has never held an annual GMS;
            b) His/her accountability as a member of the Board of Directors and/or member of the Board of Commissioners has ever been rejected by the GMS or has never provided accountability as a member of the Board of Directors and/or member of the Board of Commissioners to the GMS;
            c) Has ever caused a company that has obtained a permit, approval, or registration from the Financial Services Authority to fail to fulfill its obligation to submit an annual report and/or financial statement to the Financial Services Authority;
4. Has a commitment to comply with laws and regulations; and
5. Has knowledge and/or expertise in the field required by the Issuer or Public Company.

Fulfillment of these requirements must be included in a statement letter and submitted to the Bank. Furthermore, the Bank is required to examine and document it. Details of the fit and proper assessment will be explained in the composition of the Board of Directors section.

## Komposisi Direksi

Komposisi Direksi Bank Sinarmas disesuaikan dengan ketentuan 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. Berikut komposisi Direksi Bank per 31 Desember 2024.

## Composition of the Board of Directors

The composition of the Board of Directors of Bank Sinarmas is adjusted to the provisions of the Financial Services Authority Regulation No. 17 of 2023 and the Financial Services Authority Circular Letter No. 13/SEOJK.03/2017 concerning the Implementation of Governance for Commercial Banks. The following is the composition of the Bank's Board of Directors as of December 31, 2024.

| Nama<br>Name | Jabatan<br>Position | Dasar Pengangkatan<br>Basis of Appointment | Periode Masa Jabatan<br>Term of Office |
|---|---|---|---|
| Frenky Tirtowijoyo | Direktur Utama<br>President Director | Pertama kali diangkat sebagai Direktur Utama berdasarkan Keputusan RUPS Luar Biasa per tanggal 8 September 2017 dengan akhir periode jabatan hingga dilaksanakannya RUPS Tahunan 2026.<br>Appointed as President Director for the first time based on the Resolution of the Extraordinary GMS dated September 8, 2017, with the end of the term of office until the implementation of the 2026 Annual GMS. | 2023-2026 |
| Miko Andidjaja | Direktur *Retail Banking*<br>Director of Retail Banking | Pertama kali diangkat sebagai Direktur berdasarkan Keputusan RUPS Luar Biasa per tanggal 5 Desember 2018 dengan akhir periode jabatan hingga dilaksanakannya RUPS Tahunan 2026.<br>Appointed as Director for the first time based on the Resolution of the Extraordinary GMS dated December 5, 2018, with the end of the term of office until the implementation of the 2026 Annual GMS. | 2023-2026 |
| Ekajaya Ongny Putra | Direktur *Lending & Wholesale Banking*<br>Director of Lending & Wholesale Banking | Pertama kali diangkat sebagai Direktur berdasarkan Keputusan RUPS Tahunan per tanggal 14 Juni 2022 dan efektif menjabat sejak tanggal 11 Oktober 2022 dengan akhir periode jabatan hingga dilaksanakannya RUPS Tahunan 2026.<br>Appointed as Director for the first time based on the Resolution of the Annual GMS dated June 14, 2022, and effectively served since October 11, 2022, with the end of the term of office until the implementation of the 2026 Annual GMS. | 2023-2026 |
| Enny Kamal | Direktur *Consumer Business*<br>Director of Consumer Business | Pertama kali diangkat sebagai Direktur berdasarkan Keputusan Tahunan per tanggal 27 Juni 2023 dengan akhir periode jabatan hingga dilaksanakannya RUPS Tahunan 2026.<br>Appointed as Director for the first time based on the Resolution of the Annual GMS dated June 27, 2023, with the end of the term of office until the implementation of the 2026 Annual GMS. | 2023-2026 |
| Sendy | Direktur *Information Technology & Digital Experience*<br>Director of Information Technology & Digital Experiences | Pertama kali diangkat sebagai Direktur berdasarkan Keputusan Tahunan per tanggal 27 Juni 2023 dengan akhir periode jabatan hingga dilaksanakannya RUPS Tahunan 2026.<br>Appointed as Director for the first time based on the Resolution of the Annual GMS dated June 27, 2023, with the end of the term of office until the implementation of the 2026 Annual GMS. | 2023-2026 |
| Amandalia Johanes | Direktur *Compliance & Risk Management*<br>Director of Compliance & Risk Management | Pertama kali diangkat sebagai Direktur berdasarkan Keputusan RUPS Luar Biasa per tanggal 28 Oktober 2024 dengan akhir periode jabatan hingga dilaksanakannya RUPS Tahunan 2026.<br>Appointed as Director for the first time based on the Resolution of the Extraordinary GMS dated October 28, 2024, with the end of the term of office until the 2026 Annual GMS. | 2024-2026 |

## Ruang Lingkup Pekerjaan dan Tanggung Jawab Masing-masing Direksi

Ruang lingkup tugas dan tanggung jawab masing-masing anggota Direksi Sinarmas dijelaskan sebagai berikut:

## Scope of Work and Responsibilities of Each Board of Directors

The scope of duties and responsibilities of each member of the Sinarmas Board of Directors is explained as follows:

| Nama<br>Name | Jabatan<br>Position | Tugas dan Tanggung Jawab<br>Duties and Responsibilities |
|---|---|---|
| Frenky Tirtowijoyo | Direktur Utama<br>President Director | Bertanggung jawab atas seluruh tugas Direksi dengan memperhatikan *span of control* dan mengarahkan, mengawasi dan melakukan evaluasi secara langsung Unit Kerja *Finance & Performance Management, Human Capital and Operations, Internal Audit, Corporate Secretary, Corporate Liaison,* dan *Corporate Strategic Planning* (revisi penamaan), dan *Procurement*.<br>Responsible for all duties of the Board of Directors by paying attention to the span of control and directing, supervising, and conducting direct evaluations of the Finance & Performance Management, Human Capital Management, Internal Audit, Corporate Secretary, Corporate Liaison, and Corporate Strategic Planning and Procurement Work Units. |
| Miko Andidjaja | Direktur *Retail Banking*<br>Director of Retail Banking | Mengarahkan, mengawasi dan melakukan evaluasi secara langsung Unit Kerja *Sales and Distribution, Deposit Investment Product Development, Digital Marketing, Agent Banking, Sales and Distribution Enablement* dan *Digital Sales*.<br>Directing, supervising, and conducting direct evaluations of the Sales and Distribution, Deposit Investment Product Development, Digital Marketing, Agent Banking, Sales and Distribution Enablement and Digital Sales Work Units. |

| Nama<br>Name | Jabatan<br>Position | Tugas dan Tanggung Jawab<br>Duties and Responsibilities |
|---|---|---|
| Ekajaya Ongny Putra | Direktur *Lending & Wholesale Banking*<br>Director of Lending & Wholesale banking | Mengarahkan, mengawasi dan melakukan evaluasi secara langsung Unit Kerja *Micro, Small & Enterprise Business, Corporate and Commercial Banking, Corporate Banking Business Solution, Treasury and Financial Institution, Securities Services dan Indirect Business*<br>Directing, supervising, and conducting direct evaluations of the Micro, Small & Enterprise Business, Corporate and Commercial Banking, Corporate Banking Business Solution, Treasury and Financial Institution, Securities Services dan Indirect Business |
| Enny Kamal | Direktur *Consumer Business*<br>Director of Consumer Business | Mengarahkan, mengawasi dan melakukan evaluasi secara langsung Unit Kerja *Credit Administration and Control, Business Continuation and General Services, Loan Recovery, Payment Transaction and Consumer Loan, Credit Card,* dan *Collateral Valuation*<br>Directing, supervising, and conducting direct evaluations of the Credit Administration and Control, Business Continuation and General Services, Loan Recovery, Payment Transaction and Consumer Loan, Credit Card, and Collateral Valuation. |
| Sendy | Direktur *Information Technology & Digital Experience*<br>Director of Information Technology & Digital Experience | Mengarahkan, mengawasi dan melakukan evaluasi secara langsung Unit Kerja *IT Governance, Strategy, Architecture, Planning & Information Security ; Customer Facing & Internal Product Management ; Technical Product Management ; Software Engineering ; IT Infrastructure, DevOps, Operations & Product Assurance ; Business Intelligence* dan *Artificial Intelligence & Decision Science*<br>Directing, supervising, and conducting direct evaluations of the IT Governance, Strategy, Architecture, Planning & Information Security ; Customer Facing & Internal Product Management; Technical Product Management ; Software Engineering ; IT Infrastructure, DevOps, Operations & Product Assurance ; Business Intelligence and Artificial Intelligence & Decision Science Work Units. |
| Amandalia Johanes | Direktur *Compliance & Risk Management*<br>Director of Compliance & Risk Management | Mengarahkan, mengawasi dan melakukan evaluasi secara langsung Unit Kerja *Compliance, Risk Management, Credit Management (MSME & Consumer), Credit Management (Corporate & Commercial), Legal* dan *Anti Fraud Management.*<br>Direct, supervise and evaluate the Compliance, Risk Management, Credit Management (MSME & Consumer), Credit Management (Corporate & Commercial), Legal and Anti Fraud Management Work Units. |

## Penilaian Kemampuan dan Kepatutan Direksi

Bank memastikan bahwa semua anggota Direksi telah lulus penilaian kemampuan dan kepatutan (*fit and proper test*). Komitmen ini merupakan wujud kepatuhan Bank terhadap Peraturan Otoritas Jasa Keuangan No. 27/POJK.03/2016 Penilaian Kemampuan dan Kepatutan bagi Pihak Utama Lembaga Jasa Keuangan. Informasi mengenai hasil *fit and proper test* Direksi Bank Sinarmas diungkapkan pada tabel berikut.

## Board of Directors Fit and Proper Test

The Bank ensures that all members of the Board of Directors have passed the fit and proper test. This commitment is a manifestation of the Bank's compliance with Financial Services Authority Regulation No. 27/POJK.03/2016 on Fit and Proper Test for Main Parties of Financial Services Institutions. Information regarding the results of the fit and proper test of the Board of Directors of Bank Sinarmas is disclosed in the following table.

| Nama<br>Name | Jabatan<br>Position | Pelaksana<br>Organizer | No. Surat<br>Letter No. | Tanggal<br>Date | Hasil<br>Result |
|---|---|---|---|---|---|
| Frenky Tirtowijoyo | Direktur Utama<br>President Director | Otoritas Jasa Keuangan<br>Financial Service Authority | KEP-131/D.03/2017 | 19 Juli 2017<br>July 19, 2017 | Lulus<br>Passed |
| Miko Andidjaja | Direktur *Retail Banking*<br>Director of Retail Banking | Otoritas Jasa Keuangan<br>Financial Service Authority | KEP-121/D.03/2018 | 2 Agustus 2018<br>August 2, 2018 | Lulus<br>Passed |
| Ekajaya Ongny Putra | Direktur *Lending & Wholesale Banking*<br>Director of Lending & Wholesale Banking | Otoritas Jasa Keuangan<br>Financial Service Authority | KEP-151/D.03/2022 | 3 Oktober 2022<br>October 3, 2022 | Lulus<br>Passed |
| Enny Kamal | Direktur *Consumer Business*<br>Director of Consumer Business | Otoritas Jasa Keuangan<br>Financial Service Authority | KEPR-63/D.03/2023 | 27 Juni 2023<br>June 27, 2023 | Lulus<br>Passed |
| Sendy | Direktur *Information Technology & Digital Experience*<br>Director of Information Technology & Digital Experience | Otoritas Jasa Keuangan<br>Financial Service Authority | KEPR-64/D.03/2023 | 27 Juni 2023<br>June 27, 2023 | Lulus<br>Passed |
| Amandalia Johanes | Direktur *Compliance & Risk Management*<br>Director of Compliance & Risk Management | Otoritas Jasa Keuangan<br>Financial Service Authority | KEPR-109/D.03/2024 | 30 Agustus 2024<br>August 30, 2024 | Lulus<br>Passed |

## Rangkap Jabatan Direksi

Seluruh anggota Direksi Bank Sinarmas tidak merangkap jabatan di perusahaan/instansi mana pun.

## Concurrent Positions of the Board of Directors

All members of the Board of Directors of Bank Sinarmas do not hold concurrent positions in any company/institution.

## Rangkap Jabatan Direksi di Perusahaan Lain
**Concurrent Position of the Board of Directors in Other Companies**

| Nama<br>Name | Jabatan<br>Position | Perusahaan/Lembaga Lain<br>Other Companies/Institutions | | |
|---|---|---|---|---|
| | | Jabatan<br>Position | Institusi<br>Institution | Bidang Usaha<br>Line of Business |
| Frenky Tirtowijoyo | Direktur Utama<br>President Director | Nihil<br>Nil | Nihil<br>Nil | Nihil<br>Nil |
| Miko Andidjaja | Direktur *Retail Banking*<br>Director of Retail Banking | Nihil<br>Nil | Nihil<br>Nil | Nihil<br>Nil |
| Ekajaya Ongny Putra | Direktur *Lending & Wholesale Banking*<br>Director of Lending & Wholesale Banking | Nihil<br>Nil | Nihil<br>Nil | Nihil<br>Nil |
| Enny Kamal | Direktur *Consumer Business*<br>Director of Consumer Business | Nihil<br>Nil | Nihil<br>Nil | Nihil<br>Nil |
| Sendy | Direktur *Information Technology & Digital Experience*<br>Director of Information Technology & Digital Experience | Nihil<br>Nil | Nihil<br>Nil | Nihil<br>Nil |
| Amandalia Johanes | Direktur *Compliance & Risk Management*<br>Director of Compliance & Risk Management | Nihil<br>Nil | Nihil<br>Nil | Nihil<br>Nil |

## Rangkap Jabatan Direksi dalam Komite Bank Sinarmas
**Concurrent Position of the Board of Director in the Committee of Bank Sinarmas**

| Nama<br>Name | Jabatan di Bank Sinarmas<br>Positions at Bank Sinarmas | Jabatan di Komite Bank Sinarmas<br>Position in the Committee of Bank Sinarmas |
|---|---|---|
| Frenky Tirtowijoyo | Direktur Utama<br>President Director | - Anggota Komite Manajemen Risiko<br>- Ketua ALCO<br>- Anggota Komite Kebijakan Perkreditan<br>- Ketua Komite Human Capital<br>- Ketua Komite Information Technology<br>- Ketua Komite Manajemen Risiko Terintegrasi<br>- Member of the Risk Management Committee<br>- Chairman of ALCO<br>- Member of the Credit Policy Committee<br>- Chairman of the Human Capital Committee<br>- Chairman of the Information Technology Committee<br>- Chairman of the Integrated Risk Management Committee |
| Miko Andidjaja | Direktur *Retail Banking*<br>Director of Retail Banking | - Anggota Komite Manajemen Risiko<br>- Anggota ALCO<br>- Anggota Komite Kebijakan Perkreditan<br>- Member of the Risk Management Committee<br>- Member of ALCO<br>- Member of the Credit Policy Committee |
| Ekajaya Ongny Putra | Direktur *Lending & Wholesale Banking*<br>Director of Lending & Wholesale Banking | - Anggota Komite Manajemen Risiko<br>- Anggota ALCO<br>- Anggota Komite Kebijakan Perkreditan<br>- Member of the Risk Management Committee<br>- Member of ALCO<br>- Member of the Credit Policy Committee |
| Enny Kamal | Direktur *Consumer Business*<br>Director of Consumer Business | - Anggota Komite Manajemen Risiko<br>- Anggota ALCO<br>- Anggota Komite Kebijakan Perkreditan<br>- Member of the Risk Management Committee<br>- Member of ALCO<br>- Member of the Credit Policy Committee |
| Sendy | Direktur *Information Technology & Digital Experience*<br>Director of Information Technology & Digital Experience | - Anggota Komite Manajemen Risiko<br>- Anggota ALCO<br>- Anggota Komite Kebijakan Perkreditan<br>- Wakil Ketua Komite Information Technology<br>- Member of the Risk Management Committee<br>- Member of ALCO<br>- Member of the Credit Policy Committee<br>- Vice Chairman of the Information Technology Committee |
| Amandalia Johanes | Direktur *Compliance & Risk Management*<br>Director of Compliance & Risk Management | - Ketua Komite Manajemen Risiko<br>- Anggota ALCO<br>- Anggota Komite Kebijakan Perkreditan<br>- Anggota Komite Information Technology<br>- Anggota Komite Manajemen Risiko Terintegrasi<br>- Chairman of the Risk Management Committee<br>- Member ALCO<br>- Member of the Credit Policy Committee<br>- Memberof the Information Technology Committee<br>- Memberof the Integrated Risk Management Committee |

## Pengelolaan Benturan Kepentingan Direksi

[GRI 2-15]

Aturan terkait pengelolaan benturan kepentingan Direksi telah dimuat dalam Pedoman Direksi yang ditetapkan melalui Pedoman Direksi Rev 2.0 No. SK.045/2018/PRESDIR-CorSec tertanggal 25 Oktober 2018, sebagai berikut.

1. Direksi wajib memperhatikan prinsip dasar untuk menghindari benturan kepentingan terhadap kebijakan dan pelaksanaan Tata Kelola Perusahaan sebagaimana telah diatur di dalam peraturan regulator.
2. Dalam hal ini terjadi benturan kepentingan, anggota Direksi dilarang mengambil tindakan yang dapat merugikan Bank atau mengurangi keuntungan Bank dan wajib mengungkapkan benturan kepentingan dalam setiap keputusan.

## Orientasi bagi Direksi

Bank Sinarmas menyelenggarakan program orientasi khusus bagi Direksi yang baru diangkat dengan ketentuan sebagai berikut.

1. Program Orientasi bagi anggota Direksi yang baru bertujuan untuk memberikan arahan kepada anggota Direksi baru agar memperoleh pemahaman tentang Perseroan Sehingga dapat menunjang efektivitas pelaksanaan tugas dan tanggung jawabnya sebagai Direktur.
2. Dalam program orientasi yang bersangkutan akan mendapat pengetahuan tentang Perseroan antara lain visi, misi, objektif jangka panjang, Rencana Bisnis Bank, Laporan Keuangan, Laporan Tahunan dan kebijakan-kebijakan terkait Direksi.
3. Dokumen orientasi dipersiapkan oleh *Corporate Secretary*.

Pada tahun 2024, terdapat perubahan komposisi anggota Direksi. *Corporate Secretary* telah melakukan orientasi untuk Direktur baru dengan menyediakan dokumen orientasi dan memastikan pemahaman terkait Bank, seperti visi, misi, objektif jangka panjang, Rencana Bisnis, Laporan Keuangan, Laporan Tahunan, kebijakan-kebijakan, serta hak dan kewajiban Direktur.

## Sertifikasi Manajemen Risiko

Bank Sinarmas memastikan bahwa seluruh Direksi telah mendapatkan Sertifikasi Manajemen Risiko sebagai syarat mengikuti *fit and proper test*, sesuai peraturan Otoritas Jasa Keuangan. Penyelenggaraan (*refreshment*) Program Penyegaran Sertifikasi Manajemen Risiko juga dilakukan sesuai ketentuan Peraturan Bank Indonesia No. 11/19/PBI/2009 Pasal 14 Ayat 1, yakni Komisaris dan Manajer Risiko Bank yang telah memiliki sertifikasi manajemen risiko.

Jangka waktu *refreshment* tersebut terhitung sejak Sertifikat Manajemen Risiko terakhir diterbitkan. Kebijakan *refreshment* juga ditetapkan oleh Surat Edaran OJK Nomor 28/SEOJK.03/2022 tentang Sertifikasi Manajemen Risiko

## Management of Conflict of Interest of the Board of Directors [GRI 2-15]

The regulation related to the management of conflicts of interest of the Board of Directors have been included in the Board of Directors Guidelines stipulated through the Board of Directors Guidelines Rev 2.0 No. SK.045/2018/PRESDIR-CorSec dated October 25, 2018, as follows.

1. The Board of Directors must pay attention to the basic principles to avoid conflicts of interest against the policies and implementation of Corporate Governance as stipulated in the regulatory regulations.
2. In the event of a conflict of interest, members of the Board of Directors are prohibited from taking actions that may harm the Bank or reduce the Bank's profits and must disclose the conflict of interest in every decision.

## Orientation for the Board of Directors

Bank Sinarmas organizes a special orientation program for newly appointed Directors with the following provisions.

1. The Orientation Program for new members of the Board of Directors aims to provide direction to new members of the Board of Directors to gain an understanding of the Company, ensuring that they can support the effectiveness of the implementation of their duties and responsibilities as Directors.
2. In the orientation program, the person concerned will gain knowledge about the Company, including the vision, mission, long-term objectives, Bank Business Plan, Financial Statement, Annual Report, and policies related to the Board of Directors.
3. Orientation documents are prepared by the Corporate Secretary.

In 2024, there were changes in the composition of the Board of Directors. The Corporate Secretary has conducted orientation for the new Director by providing orientation documents and ensuring understanding related to the Bank, such as the vision, mission, long-term objectives, Business Plan, Financial Statement, Annual Report, policies, and the rights and obligations of the Director.

## Risk Management Certification

Bank Sinarmas ensures that all Directors have obtained Risk Management Certification as a requirement to take the fit and proper test, in accordance with the regulations of the Financial Services Authority. The implementation (refreshment) of the Risk Management Certification Refresher Program is also carried out in accordance with the provisions of Bank Indonesia Regulation No. 11/19/PBI/2009 Article 14 Paragraph 1, namely Commissioners and Bank Risk Managers who have risk management certification.

The refreshment period is calculated from the date the last Risk Management Certificate was issued. The refreshment policy is also stipulated in OJK Circular Letter No. 28/SEOJK.03/2022 concerning Risk Management Certification

Bagi Sumber Daya Manusia Bank Umum. Regulasi ini menegaskan bahwa program *refreshment* 1 (satu) kali dalam 1 (satu) tahun. Program *refreshment* sekaligus memperpanjang masa berlaku sertifikasi manajemen risiko.

for Human Resources of Commercial Banks. This regulation confirms that the refreshment program is once a year. The refreshment program also extends the validity period of the risk management certification.

Informasi terkait *refreshment* yang telah diikuti Direksi, diungkapkan pada tabel berikut.

Information related to the refreshment that has been followed by the Board of Directors is disclosed in the following table.

| Nama<br>Name | Jabatan<br>Position | *Refreshment* Terakhir<br>Last Refreshment | Tema *Refreshment*<br>Refreshment Theme |
|---|---|---|---|
| Frenky Tirtowijoyo | Direktur Utama<br>President Director | 3 November 2023<br>November 3, 2023 | Strengthen 4 Pillar Risk Management Toward Sustainable Bank |
| Miko Andidjaja | Direktur *Retail Banking*<br>Director of Retail Banking | 3 November 2023<br>November 3, 2023 | Strengthen 4 Pillar Risk Management Toward Sustainable Bank |
| Ekajaya Ongny Putra | Direktur *Lending & Wholesale Banking*<br>Director of Lending & Wholesale Banking | 3 November 2023<br>November 3, 2023 | Strengthen 4 Pillar Risk Management Toward Sustainable Bank |
| Enny Kamal | Direktur *Consumer Business*<br>Director of Consumer Business | 3 November 2023<br>November 3, 2023 | Strengthen 4 Pillar Risk Management Toward Sustainable Bank |
| Sendy | Direktur *Information Technology & Digital Experience*<br>Director of Information Technology & Digital Experience | 3 November 2023<br>November 3, 2023 | Strengthen 4 Pillar Risk Management Toward Sustainable Bank |
| Amandalia Johanes | Direktur *Compliance & Risk Management*<br>Director of Compliance & Risk Management | 1 Desember 2023<br>December 1, 2023 | Accelerating Inclusive Digital Economy Transformation and Sustainability Economic Growth (and impact on Risk Based Bank Rating and Risk Appetite) |

## Pelaksanaan Tugas dan Tanggung Jawab Tahun 2024

Sepanjang tahun 2024, Direksi Bank Sinarmas telah melaksanakan tugas dan tanggung jawab sebagai berikut.

1. Melakukan proses penyusunan dan evaluasi strategi Bank melalui Rapat Direksi terkait Rencana Bisnis Bank (RBB) 2024 dan revisi RBB 2024.
2. Meningkatkan customer experience bagi setiap nasabah. Hal ini dilakukan melalui aspirasi Bank untuk menjadi payment & transaction bank dengan menawarkan produk, layanan finansial, serta cross selling yang lengkap, sehingga pilihan produk bagi nasabah semakin beragam dan nasabah dapat bertransaksi di mana pun melalui layanan yang disediakan Bank. Saat ini, Bank juga sedang mengembangkan layanan prioritas.
3. Melalui Komite Pengarah Teknologi Informasi (TI), menetapkan dan mengevaluasi rencana strategis TI, memantau dan memastikan kebijakan serta standar prosedur (termasuk sosialisasinya) terkait penggunaan TI yang memadai bagi Bank, serta memastikan seluruh kegiatan penyelenggaraan TI sesuai dengan POJK No. 11 Tahun 2022 tentang Penyelenggaraan Teknologi Informasi oleh Bank Umum.
4. Menjalankan rencana aksi keuangan berkelanjutan.
5. Memperkuat sumber daya manusia melalui rekrutmen untuk posisi-posisi strategis.
6. Melakukan penanganan kredit bermasalah sepanjang tahun 2024 secara optimal, baik melalui penagihan intensif maupun eksekusi jaminan.
7. Meningkatkan kualitas penerapan manajemen risiko kredit agar potensi risiko kredit dapat dimitigasi dan

## Implementation of Duties and Responsibilities in 2024

Throughout 2024, the Board of Directors of Bank Sinarmas has carried out the following duties and responsibilities.

1. Conducting the preparation and evaluation of the Bank's strategy through Board of Directors Meetings regarding the Bank's 2024 Business Plan (RBB) and its revisions;
2. Enhancing customer experience for all clients. This is pursued through the Bank's aspiration to become a payment and transaction bank by offering comprehensive financial products, services, and cross-selling opportunities, providing customers with a broader range of choices and enabling them to transact anywhere through services provided by the Bank. Currently, the Bank is also developing its priority banking services;
3. Through the Information Technology (IT) Steering Committee, establishing and evaluating the Bank's IT strategic plan, monitoring and ensuring that policies and standard procedures (including their dissemination) regarding the appropriate use of IT are in place, and ensuring that all IT operations comply with POJK No. 11 of 2022 concerning the Implementation of Information Technology by Commercial Banks;
4. Implementing the sustainable finance action plan;
5. Strengthening human resources by recruiting for strategic positions;
6. Optimizing the resolution of non-performing loans throughout 2024, through intensive collection efforts and collateral execution;
7. Improving the quality of credit risk management to mitigate potential credit risks and maintain the quality of borrowers'

kualitas kredit debitur tetap terkelola. Upaya perbaikan difokuskan pada proses inisiasi kredit melalui perbaikan kebijakan, pemantauan kredit, hingga penanganan kredit bermasalah pada seluruh segmen kredit, baik korporat, ritel, mikro, maupun konsumsi.

credit. Improvement efforts are focused on the credit initiation process through policy enhancements, credit monitoring, and the handling of non-performing loans across all credit segments, including corporate, retail, micro, and consumer loans.

## Pengembangan Kompetensi Direksi

### Kebijakan

Bank Sinarmas telah memiliki kebijakan untuk memfasilitasi Direksi mengikuti berbagai program pengembangan kompetensi. Langkah ini dilakukan guna memastikan Direksi memiliki kompetensi yang diperlukan untuk menjalankan perannya secara efektif dalam mendukung kesuksesan dan keberlanjutan Bank.

### Realisasi

Informasi mengenai program pengembangan kompetensi Direksi pada tahun 2024 diungkapkan sebagai berikut.

## Board of Directors Competency Development

### Policy

Bank Sinarmas has a policy to facilitate the Board of Directors' participation in various competency development programs. This step is taken to ensure that the Board of Directors has the competencies needed to carry out its role effectively in supporting the success and sustainability of the Bank.

### Realization

Information regarding the Board of Directors competency development program in 2024 is disclosed as follows.

| Nama<br>Name | Jabatan<br>Position | Materi Pengembangan Kompetensi<br>Competency Development Materials | Tempat/Tanggal<br>Venue/Date | Penyelenggara<br>Organizer |
|---|---|---|---|---|
| **Frenky Tirtowijoyo** | **Direktur Utama**<br>President Director | Motivational Session: Dream T.E.A.M | Roxy Square<br>26 Januari 2024<br>Roxy Square<br>January 26, 2024 | Bank Sinarmas |
| | | Workshop Internal Audit Group: Kick Off Annual Audit Plan 2024 | The Grand Mansion<br>31 Januari 2024<br>The Grand Mansion<br>January 31, 2024 | Bank Sinarmas |
| | | Seminar "Memperkuat Fondasi Transformasi Ekonomi, Kebijakan Publik yang Iklusif dan Berkelanjutan"<br>Seminar "Strengthening the Foundation of Economic Transformation, Inclusive and Sustainable Public Policy" | Hotel Indonesia Kempinski<br>20 Mei 2024<br>Hotel Indonesia Kempinski<br>May 20, 2024 | ISEI (Ikatan Sarjana Ekonomi Indonesia |
| | | Seminar Penyelerasan Manajemen Risiko Jenjang 7" Meningkatkan Efektifitas Penerapan Manajemen Risiko untuk Mewujudkan Industri Perbankan yang Berkelanjutan"<br>Risk Management Alignment Seminar Level 7 "Improving the Effectiveness of Risk Management Implementation to Realize a Sustainable Banking Industry" | Online Training<br>5-6 Juni 2024<br>Online Training<br>June 5-6, 2024 | BARa (Bankers Association for Risk Management) |
| | | Pembekalan Manajemen Risiko Jenjang 7<br>Risk Management Briefing Level 7 | Sinar Mas Land Plaza, Tower I Lantai 7<br>10 Juni 2024<br>Sinar Mas Land Plaza, Tower I, 7th Floor<br>June 10, 2024 | Jms Education |
| | | Invitation Infobank-Backbase Power Breakfast: "Unveilling Economic Insight & Strategies for Tomorrow's Leaders" | Hotel Indonesia Kempinski<br>18 Juli 2024<br>Hotel Indonesia Kempinski<br>July 18, 2024 | Infobank |
| | | Perbanas CFO Forum II - 2024 "Navigating for Sustainability: Financial Leadership in a Changing World" | The Meru Sanul Hotel - Denpasar<br>2 Agustus 2024<br>The Meru Sanul Hotel - Denpasar<br>August 2, 2024 | Perbanas |
| | | Product Workshop | Jakarta<br>5-6 November 2024<br>Jakarta<br>November 5-6, 2024 | Bank Sinarmas |
| | | CEO Networking 2024 "Navigating Global Market Forces Technology Innovation for Sustainable Business" | Hotel Raffles<br>26 November 2-24<br>Raffles Hotel<br>November 26, 2024 | Pasar Modal Indonesia |

| Nama<br>Name | Jabatan<br>Position | Materi Pengembangan Kompetensi<br>Competency Development Materials | Tempat/Tanggal<br>Venue/Date | Penyelenggara<br>Organizer |
|---|---|---|---|---|
| | | Google Workspace | Bank Sinarmas<br>15 Januari 2024<br>Bank Sinarmas<br>January 15, 2024 | Learning Center<br>Bank Sinarmas<br>Bank Sinarmas<br>Learning Center |
| **Miko Andidjaja** | **Direktur *Retail Banking***<br>**Director of Retail Banking** | Pertemuan koordinasi "Peran Pencegahan dan Pemberantasan TPPU-TPPT-PPSPM dalam menyongsong Indonesia Emas 2045"<br>Coordination meeting "The Role of Prevention and Eradication of TPPU-TPPT-PPSPM in Welcoming Golden Indonesia 2045" | Hotel Intercotinental, Jakarta Pondok Indah<br>30 Januari 2024<br>Intercontinental Hotel, Jakarta Pondok Indah<br>January 30, 2024 | PPATK |
| | | WAVE Training | Tower 1 Lt. 8<br>27 Maret 2024<br>Tower 1, 8th Floor<br>March 27, 2024 | Mckinsey |
| | | Pertemuan koordinasi "Optimalisasi Sinergi dan Kolaborasi mewujudkan Pilkada Seretak Tahun 2024 yang mendukung Integrasi Bangsa"<br>Coordination meeting "Optimizing Synergy and Collaboration to Realize Simultaneous Regional Elections in 2024 that Support National Integration" | Hotel Shangri La, Jakarta<br>7 Mei 2024<br>Shangri La Hotel, Jakarta<br>May 7, 2024 | PPATK |
| | | RUA FKDKP Tahun 2024<br>FKDKP RUA 2024 | BRIlian Club<br>15 Mei 2024<br>BRIlian Club<br>May 15, 2024 | FKDKP |
| | | Seminar Penyelarasan Manajemen Risiko Jenjang 7<br>Level 7 Risk Management Alignment Seminar | Mandiri Club<br>21 Mei 2024<br>Mandiri Club<br>May 21, 2024 | Banker Association For Risk Management |
| | | Seminar Penyelarasan Manajemen Risiko Jenjang 7<br>Level 7 Risk Management Alignment Seminar | Mandiri Club<br>22 Mei 2024<br>Mandiri Club<br>May 22, 2024 | Banker Association For Risk Management |
| | | Pembekalan Manajemen Risiko Jenjang 7<br>Level 7 Risk Management Alignment Seminar | Tower 1 Lt. 8<br>28 Mei 2024<br>Tower 1, 8th Floor<br>May 28, 2024 | Jms Education |
| | | Kegiatan "Rembuk Nasional"<br>"National Consultation" Activities | Gedung PPATK<br>6 Juni 2024<br>PPATK Building<br>June 6, 2024 | PPATK |
| | | Penguatan Penerapan Program APU PPT dan PPPSPM dalam rangka pemberantasan tindak kejahatan ekonomi<br>Strengthening the Implementation of APU PPT and PPPSPM Programs in the context of eradicating economic crimes | Menara Radius Prawiro<br>8 Juli 2024<br>Menara Radius Prawiro<br>July 8, 2024 | OJK |
| | | Enterprise Architecture Jump-start | Bank Sinarmas<br>5 Agustus 2024<br>Bank Sinarmas<br>August 5, 2024 | Learning Center<br>Bank Sinarmas<br>Bank Sinarmas<br>Learning Center |
| | | Gencar Agent Banking | Jiexpo Convention Center<br>22 Agustus 2024<br>Jiexpo Convention Center<br>August 22, 2024 | OJK |
| | | Townhall | Swasana Lippo Kuningan<br>30 Agustus 2024<br>Swasana Lippo Kuningan<br>August 30, 2024 | Bank Sinarmas |
| | | BSIM AI Day | The Grand Mansion<br>18 September 2024<br>The Grand Mansion<br>September 18, 2024 | Bank Sinarmas |
| | | Sinar Mas Digital Day 2024 | ICE BSD<br>27 September 2024<br>ICE BSD<br>September 27, 2024 | Bank Sinarmas |
| | | Event Bank Sinarmas Prioritas: Overseas Education Assistance with Expert Education<br>Priority Bank Sinarmas Event: Overseas Education Assistance with Expert Education | GIOI Menteng<br>18 Oktober 2024<br>GIOI Menteng<br>October 18, 2024 | PT Expert Education dan Jasa Visa Indonesia |
| | | Product Workshop 2024 | Aston Kartika Grogol<br>5-6 November 2024<br>Aston Kartika Grogol<br>November 5-6, 2024 | Bank Sinarmas |
| | | Pesta Inklusif 2024 dalam rangka memperingati hari disabilitas internasional<br>Inclusive Party 2024 to commemorate International Day of Disability | Taman Ismail Marzuki<br>6 Desember 2024<br>Taman Ismail Marzuki<br>December 6, 2024 | OJK |

| Nama<br>Name | Jabatan<br>Position | Materi Pengembangan Kompetensi<br>Competency Development Materials | Tempat/Tanggal<br>Venue/Date | Penyelenggara<br>Organizer |
|---|---|---|---|---|
| **Ekajaya Ongny Putra** | **Direktur *Lending & Wholesale Banking***<br>**Director of Lending & Wholesale Banking** | Google Workspace | Bank Sinarmas<br>15 Januari 2024<br>Bank Sinarmas<br>January 15, 2024 | Learning Center Bank Sinarmas |
| | | Pertemuan Tahunan Industri Jasa Keuangan 2024<br>Financial Services Industry Annual Meeting 2024 | The St. Regis, Jakarta<br>20 Februari 2024<br>The St. Regis, Jakarta<br>February 20, 2024 | OJK |
| | | Ai For Business Leaders Summit 2024 | Online Training<br>6 Maret 2024<br>Online Training<br>March 6, 2024 | Infobank Institute |
| | | Fortune Indonesian summit 2024 | The Tribata, Dharmawangsa<br>7 Maret 2024<br>The Tribata, Dharmawangsa<br>March 7, 2024 | IDN Media |
| | | WAVE Training | Tower 1 Lt. 8<br>27 Maret 2024<br>Tower 1, 8th Floor<br>March 27, 2024 | Mckinsey |
| | | Seminar Penyelarasan Manajemen Risiko Jenjang 7<br>Level 7 Risk Management Alignment Seminar | Mandiri Club<br>5 Juni 2024<br>Mandiri Club<br>June 5, 2024 | Banker Association For Risk Management |
| | | Seminar Penyelarasan Manajemen Risiko Jenjang 7<br>Level 7 Risk Management Alignment Seminar | Mandiri Club<br>6 Juni 2024<br>Mandiri Club<br>June 6, 2024 | Banker Association For Risk Management |
| | | Pembekalan Resertifikasi Manajemen Risiko Jenjang Kualifikasi VII (BSIM)<br>Risk Management Recertification Provision Qualification Level VII (BSIM) | Tower 1 Lt. 8<br>10 Juni 2024<br>Tower 1, 8th Floor<br>June 10, 2024 | Jms Education |
| | | Enterprise Architecture Jump-start | Bank Sinarmas<br>5 Agustus 2024<br>Bank Sinarmas<br>August 5, 2024 | Learning Center Bank Sinarmas<br>Bank Sinarmas Learning Center |
| | | Townhall | Swasana Lippo Kuningan<br>30 Agustus 2024<br>Swasana Lippo Kuningan<br>August 30, 2024 | Bank Sinarmas |
| | | Pembekalan Sertifikasi Treasury Jenjang 7<br>Treasury Certification Provision Level 7 | Tower 1 Lt. 8<br>13 September 2024<br>Tower 1, 8th Floor<br>September 13, 2024 | APUVINDO |
| | | BSIM AI Day | The Grand Mansion<br>18 September 2024<br>The Grand Mansion<br>September 18, 2024 | Bank Sinarmas |
| | | Sharing Session : Pemantapan Sertifikasi Treasury<br>Sharing Session: Treasury Certification Strengthening | Tower 1 Lt. 8<br>20 September 2024<br>Tower 1, 8th Floor<br>September 20, 2024 | Bank Sinarmas |
| | | Sinar Mas Digital Day 2024 | ICE BSD | Bank Sinarmas |
| | | Undangan High Level Meeting Bank Indonesia dengan APUVINDO<br>Invitation to High Level Meeting of Bank Indonesia with APUVINDO | Four Season Jakarta<br>27 September 2024<br>Four Seasons Jakarta<br>September 27, 2024 | Bank Indonesia<br>9 Oktober 2024<br>Bank Indonesia<br>October 9, 2024 |
| | | Treasury Banking Summit: "Deepening Financial Market Through Collaboration" | Sheraton Mustika, Yogyakarta<br>1-2 November 2024<br>Sheraton Mustika, Yogyakarta<br>November 1-2, 2024 | PT Bank Rakyat Indonesia (Persero) |
| | | Product Workshop 2024 | Aston Kartika Grogol<br>5-6 November 2024<br>Aston Kartika Grogol<br>November 5-6, 2024 | Bank Sinarmas |
| | | Training NUS Executive Education: Welcome to Driving Strategic Innovation Program | Singapore<br>25-29 November 2024<br>Singapore<br>November 25-29, 2024 | Nation University of Singapore |
| | | Prioritization - Product Workshop | Tower 1 Lt. 8<br>19 Desember 2924<br>Tower 1, 8th Floor<br>December 19, 2024 | Bank Sinarmas |

| Nama<br>Name | Jabatan<br>Position | Materi Pengembangan Kompetensi<br>Competency Development Materials | Tempat/Tanggal<br>Venue/Date | Penyelenggara<br>Organizer |
|---|---|---|---|---|
| **Enny Kamal** | **Direktur *Consumer Business***<br>Director of Consumer Business | Google Workspace | Jakarta<br>15 Januari 2024<br>Jakarta<br>January 15, 2024 | Bank Sinarmas |
| | | Pelatihan Relawan Tzu Chi<br>Tzu Chi Volunteer Training | Jakarta<br>29 Februari 2024<br>Jakarta<br>February 29, 2024 | Bank Sinarmas |
| | | Seminar Penyelarasan Manajemen Risiko Jenjang 7<br>Level 7 Risk Management Alignment Seminar | Online Training<br>5-6 Juni 2024<br>Online Training<br>June 5-6, 2024 | Banker Association For Risk Management |
| | | Pembekalan Manajemen Risiko Jenjang 7<br>Risk Management Briefing Level 7 | Jakarta<br>10 Juni i2024<br>Jakarta<br>June 10, 2024 | JMS Education |
| | | Enterprise Architecture Jumpstart | Jakarta<br>5-8 Agustus 2024<br>Jakarta<br>August 5-8, 2024 | Bank Sinarmas |
| | | Fundamental Card Training | Jakarta<br>5-7 September 2024<br>Jakarta<br>September 5-7, 2024 | Bank Sinarmas |
| | | Product Workshop | Jakarta<br>5-6 September 2024<br>Jakarta<br>September 5-6, 2024 | Bank Sinarmas |
| | | Perlindungan Data Pribadi<br>Personal Data Protection | Jakarta<br>6 September 2024<br>Jakarta<br>September 6, 2024 | Bank Sinarmas |
| | | Leadership, Produtivity, Motivation & Team Work | Bogor<br>20-21 September 2024<br>Bogor<br>September 20-21, 2024 | Bank Sinarmas |
| | | Training Coso Erm | Jakarta<br>25-26 Sep 24<br>Jakarta<br>September 25-26, 2024 | Bank Sinarmas |
| | | Kerangka Kerja Terbaru Risiko Pasar Fundamental Review Of Trading Book (frtb)<br>Fundamental Review Of Trading Book (frtb) Market Risk Latest Framework | Jakarta<br>10-11 September 2024<br>Jakarta<br>September 10-11, 2024 | Bank Sinarmas |
| | | Program Perlindungan Data Pribadi (pdp)<br>Personal Data Protection Program (pdp) | Bogor<br>13-14 Desember 2024<br>Bogor<br>December 13-14, 2024 | Bank Sinarmas |

| Nama<br>Name | Jabatan<br>Position | Materi Pengembangan Kompetensi<br>Competency Development Materials | Tempat/Tanggal<br>Venue/Date | Penyelenggara<br>Organizer |
|---|---|---|---|---|
| | | Juniper Spine & Leaf Usa 2024 | Sunnyvale, California, USA<br>28 Januari 2024<br>Sunnyvale, California, USA<br>January 28, 2024 | Juniper Networks, Inc |
| | | Google Workspace | Jakarta<br>15 Januari 2024<br>Jakarta<br>January 15, 2024 | Bank Sinarmas |
| | | Program Binus Internship<br>Binus Internship Program | Jakarta<br>16-29 Februari 2024<br>Jakarta<br>February 16-29, 2024 | Bank Sinarmas |
| | | F5 Worldapp 2024 | San Jose, California, Usa<br>6-8 Februari 2024<br>San Jose, California, USA<br>February 6-8, 2024 | F5, Inc |
| | | Aruba Edgeconnect Training | Singapura<br>29 April-1 Mei 1024<br>Singapore<br>April 29 - May 1, 2024 | HPE Aruba Networking |
| | | Product Workshop Simobiplus | Jakarta<br>14-29 Juni 2024<br>Jakarta<br>June 14-29, 2024 | Bank Sinarmas |
| **Sendy** | **Direktur *Information Technology & Digital Experience***<br>**Director of Information Technology & Digital Experience** | Leadership Conference 2024 | Los Angeles, USA<br>15 Juni 2024<br>Los Angeles, USA<br>June 15, 2024 | Vectra AI, Inc |
| | | Pegaworld Inspire 2024 | Las Vegas, Nv, USA<br>9-11 Juni 2024<br>Las Vegas, Nv, USA<br>June 9-11, 2024 | Pegasystems Inc |
| | | The Atmoshphere Edge Program At Hpe Discover 2024 | Las Vegas, Nv, USA<br>17-20 Juni 2024<br>Las Vegas, Nv, USA<br>June 17-20, 2024 | HPE Aruba Networking |
| | | Enterprise Architecture Jumpstart | Jakarta<br>5-8 Agustus 2024<br>Jakarta<br>August 5-8, 2024 | Bank Sinarmas |
| | | Seminar Penyelarasan Manajemen Risiko Jenjang 7<br>Level 7 Risk Management Alignment Seminar | Online Training<br>4-5 September 2024<br>Online Training<br>September 4-5, 2024 | Bankers Association for Risk Management (BARA) |
| | | Perlindungan Data Pribadi<br>Personal Data Protection | Jakarta<br>6 September 2024<br>Jakarta<br>September 6, 2024 | Bank Sinarmas |
| | | Pembekalan Manajemen Risiko Jenjang 7<br>Risk Management Briefing Level 7 | Online Training<br>11 Oktober 2024<br>Online Training<br>October 11, 2024 | JMS Education |
| | | Palo Alto Networks at Govware | Singapura<br>14-15 Oktober 2024<br>Singapore<br>October 14-15, 2024 | Palo Alto |
| | | Product Workshop | Jakarta<br>5-6 November 2024<br>Jakarta<br>November 5-6, 2024 | Bank Sinarmas |
| | | One Way One Working | Bogor<br>2-3 Desember 2024<br>Bogor<br>December 2-3, 2024 | Bank Sinarmas |
| | | One Vision One Working | Jakarta<br>5-6 Desember 2024<br>Jakarta<br>December 5-6, 2024 | Bank Sinarmas |
| | | Banking-Data Center Executive Briefinh | Singapura<br>15-18 Desember 2024<br>Singapore<br>December 15-18, 2024 | Juniper Networks, Inc |

| Nama<br>Name | Jabatan<br>Position | Materi Pengembangan Kompetensi<br>Competency Development Materials | Tempat/Tanggal<br>Venue/Date | Penyelenggara<br>Organizer |
|---|---|---|---|---|
| **Amandalia Johanes** | **Direktur *Compliance & Risk Management***<br>Director of Compliance & Risk Management | Workshop Menyusun Financial Contingency Plan<br>Workshop on Developing a Financial Contingency Plan | Online Training<br>29-30 Oktober 2024<br>Online Training<br>October 29-30, 2024 | GRC Management |
| | | Memerangi Judi Online Dan Kejahatan Baru Di Era Transaksi Digital 5.0<br>Combating Online Gambling and New Crimes in the Era of Digital Transactions 5.0 | Jakarta<br>19 November 2024<br>Jakarta<br>November 19, 2024 | Pusat Pelaporan dan Analisis Transaksi Keuangan - PPATK<br>Financial Transaction Reports and Analysis Center - PPATK |
| | | Product Workshop | Jakarta<br>6 November 2024<br>Jakarta<br>November 6, 2024 | Bank Sinarmas |
| | | Product Workshop | Jakarta<br>5-6 November 2024<br>Jakarta<br>November 5-6, 2024 | Bank Sinarmas |
| | | Resolusi & Recovery Plan<br>Resolution & Recovery Plan | Jakarta<br>28-29 November 2024<br>Jakarta<br>November 28-29, 2024 | Bank Sinarmas |
| | | APG Annual Tupologies Workshop | Kuala Lumpur<br>11-13 November 2024<br>Kuala Lumpur<br>November 11-13, 2024 | SCRUM ASIA PASIFIK |
| | | Risk And Governance Summit 2024: Strengthening Thr Grc Ecocystem In The Financial Sector To Support The Golden Indonesia 2024 Vision | Jakarta<br>26 November 2024<br>Jakarta<br>November 26, 2024 | Otoritas Jasa Keuangan - OJK<br>Financial Services Authority - OJK |
| | | Workshop Menyusun Financial Contingency Plan<br>Workshop on Developing a Financial Contingency Plan | E-Learning<br>23-31 Desember 2024<br>E-Learning<br>December 23-31, 2024 | Bank Sinarmas |

## Penilaian Komite di Bawah Direksi

### Prosedur Penilaian

Direksi senantiasa melakukan penilaian terhadap kinerja kepada organ pendukungnya, yakni Komite Manajemen Risiko, ALCO, Komite Kebijakan Perkreditan, Komite *Human Capital*, Komite *Information Technology*, dan Komite Manajemen Risiko Terintegrasi. Penilaian dilakukan secara berkala setiap tahun.

Prosedur penilaian komite dilakukan secara mandiri (*self assessment*), tanpa melibatkan pihak ketiga. Penilaian tersebut diharapkan menjadi masukan untuk peningkatan kinerja ke depan.

### Kriteria Penilaian

Kriteria yang digunakan dalam penilaian tersebut, yakni:

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

### Hasil Penilaian

Berdasarkan hasil penilaian di tahun 2024, Direksi menyatakan bahwa komite-komite telah menjalankan tugas dan tanggung jawabnya dengan baik dan telah berkontribusi dalam mendukung pelaksanaan tugas dan tanggung jawab Direksi.

## Assessment of Committees Under the Board of Directors

### Assessment Procedure

The Board of Directors always assesses the performance of its supporting organs, namely the Risk Management Committee, ALCO, Credit Policy Committee, Human Capital Committee, Information Technology Committee, and Integrated Risk Management Committee. Assessments are carried out periodically every year.

The committee assessment procedure is carried out independently (self-assessment), without involving third parties. The assessment is expected to be input for improving future performance.

### Assessment Criteria

The criteria used in the assessment are:

1. Implementation of duties and responsibilities in 2024;
2. Recommendations given; and
3. Level of attendance at each committee meeting.

### Assessment Results

Based on the assessment results in 2024, the Board of Directors stated that the committees had carried out their duties and responsibilities well and had contributed to supporting the implementation of the duties and responsibilities of the Board of Directors.

# TRANSPARANSI INFORMASI TENTANG DEWAN KOMISARIS DAN DIREKSI

## Transparency of Information on the Board of Commissioners and Board of Directors



### Kebijakan Pemisahan Komisaris Utama dan Direktur Utama

Bank Sinarmas telah memisahkan tugas dan fungsi Komisaris Utama dengan Direktur Utama, mengingat Bank menggunakan sistem two tier dalam organisasi pengurusan Bank. Pada prinsipnya, tugas dan fungsi Komisaris Utama adalah mengoordinasikan tanggung jawab atas seluruh pengawasan dan pemberian nasihat terhadap pelaksanaan pengelolaan Bank yang dijalankan oleh Direksi.

Sementara Direktur Utama, memimpin pelaksanaan tanggung jawab atas seluruh tugas Direksi dalam mengelola Bank. Tugas dan fungsi ini dijalankan dengan memperhatikan span of control dan mengarahkan, mengawasi serta melakukan evaluasi secara langsung unit kerja Internal Audit, Finance & Performance Management, Human Capital Management, Operations, Electronic Channel Operations, Procurement, Corporate Strategic Planning, Corporate Secretary dan Corporate Liaison.

Hal ini selaras dengan peraturan perundang-undangan yang berlaku. Di antaranya, Undang-Undang Cipta Kerja No. 11 tahun 2020, yang mengubah Pasal 1 angka 2, 5, 6 Undang-Undang Perseroan Terbatas No. 40/2007 Pasal 1 angka 1, 2, 5, dan 6 yang menegaskan: Organ Perseroan adalah Rapat Umum Pemegang Saham, Direksi, dan Dewan Komisaris.

Lebih lanjut diuraikan, Direksi adalah Organ Perseroan yang berwenang dan bertanggung jawab penuh atas pengurusan Perseroan untuk kepentingan Perseroan, sesuai dengan maksud dan tujuan Perseroan serta mewakili Perseroan, baik di dalam maupun di luar pengadilan sesuai dengan ketentuan anggaran dasar.

Sedangkan Dewan Komisaris adalah Organ Perseroan yang bertugas melakukan pengawasan secara umum dan/atau khusus sesuai dengan anggaran dasar serta memberi nasihat kepada Direksi.

### Policy on Separation of the President Commissioner and President Director

Bank Sinarmas has separated the duties and functions of the President Commissioner from the President Director for the Bank adopts a two-tier system in the Bank's management organization. In principle, the duties and functions of the President Commissioner are to coordinate responsibility for all supervision and providing advice on the implementation of Bank management run by the Board of Directors.

Meanwhile, the President Director leads the implementation of responsibility for all duties of the Board of Directors in managing the Bank. These duties and functions are carried out with due attention to the span of control and directing, supervising and conducting direct evaluations of the Internal Audit, Finance & Performance Management, Human Capital Management, Operations, Electronic Channel Operations, Procurement, Corporate Strategic Planning, Corporate Secretary and Corporate Liaison work units.

This aligns with applicable laws and regulations, among which are the Job Creation Law No. 11 of 2020, which amends Article 1 numbers 2, 5, 6 of the Limited Liability Company Law No. 40/2007 Article 1 numbers 1, 2, 5, and 6 which emphasize: The Company's organs are the General Meeting of Shareholders, the Board of Directors, and the Board of Commissioners.

Further explained, the Board of Directors is the Company Organ that has the authority and is fully responsible for managing the Company for the interests of the Company, in accordance with the intent and purpose of the Company and representing the Company, both inside and outside the court in accordance with the provisions of the articles of association.

Meanwhile, the Board of Commissioners is the Company Organ tasked with carrying out general and/or specific supervision in accordance with the articles of association and providing advice to the Board of Directors.

Rincian tugas masing-masing antara Komisaris Utama dan Direktur Utama telah uraikan dalam bab "Dewan Komisaris" dan "Direksi" yang terdapat dalam bab "Tata Kelola Perusahaan" ini.

The details of the respective duties of the President Commissioner and the President Director have been described in the chapters "Board of Commissioners" and "Board of Directors" contained in this chapter "Corporate Governance".

| **Komisaris Utama**<br>President Commissioner | **Direktur Utama**<br>President Director |
|---|---|
| Tugas dan tanggung Jawab Komisaris Utama Bank Sinarmas, yakni:<br>1. Mengoordinasikan pelaksanaan tugas dan tanggung jawab Dewan Komisaris;<br>2. Memimpin rapat Dewan Komisaris;<br>3. Memimpin RUPS;<br>4. Menyampaikan Laporan Pengawasan untuk mendapatkan persetujuan RUPS Tahunan atas pelaksanaan tugas dan pengawasan Dewan Komisaris.<br>5. Memastikan bahwa pelaksanaan tanggung jawab Dewan Komisaris telah dilaksanakan sesuai prosedur.<br>6. Memastikan bahwa rapat Dewan Komisaris melakukan pengambilan keputusan secara efektif berdasarkan informasi yang benar dan lengkap, termasuk memastikan bahwa:<br>a. Semua isu-isu strategis dan penting menjadi bahan pertimbangan oleh Dewan Komisaris;<br>b. Permasalahan yang ada dibahas dengan seksama dan teliti;<br>c. Semua anggota Dewan Komisaris diberi kesempatan untuk berkontribusi secara efektif;<br>d. Setiap Komisaris menerima informasi yang relevan secara tepat waktu, termasuk diberi penjelasan singkat mengenai isu-isu yang akan dibahas dalam rapat Dewan Komisaris;<br>e. Rapat Dewan Komisaris menghasilkan keputusan-keputusan yang jelas dan dicatat dalam notulen rapat; dan<br>f. Melakukan evaluasi akhir dengan mempertimbangkan rekomendasi Komite Remunerasi dan Nominasi, atas hasil penilaian kinerja kolegial Dewan Komisaris dan komitenya serta penilaian kinerja individu atas setiap anggota Dewan Komisaris dan anggota komite-komitenya. | Tugas dan tanggung Jawab Direktur Utama Bank Sinarmas, yakni:<br><br>Bertanggung jawab atas seluruh tugas Direksi dengan memperhatikan *span of control* dan mengarahkan, mengawasi serta melakukan evaluasi secara langsung:<br>- Unit Kerja *Finance & Performance Management;*<br>- *Human Capital Management;*<br>- *Internal Audit;*<br>- *Corporate Secretary;*<br>- *Corporate Liaison; dan*<br>- *Corporate Strategic Program and Development.* |
| Duties and Responsibilities of the President Commissioner of Bank Sinarmas, namely:<br>1. Coordinating the implementation of the duties and responsibilities of the Board of Commissioners;<br>2. Chairing the Board of Commissioners meeting;<br>3. Chairing the GMS;<br>4. Submitting the Supervisory Report to obtain approval from the Annual GMS for the implementation of the duties and supervision of the Board of Commissioners.<br>5. Ensuring that the implementation of the Board of Commissioners' responsibilities has been carried out according to procedure.<br>6. Ensuring that the Board of Commissioners meeting makes resolutions effectively based on correct and complete information, including ensuring that:<br>a. All strategic and important issues are considered by the Board of Commissioners;<br>b. Existing problems are discussed carefully and thoroughly;<br>c. All members of the Board of Commissioners are given the opportunity to contribute effectively;<br>d. Each Commissioner receives relevant information in a timely manner, including being given a brief explanation of the issues to be discussed in the Board of Commissioners meeting;<br>e. The Board of Commissioners meeting produces clear resolutions and is recorded in the minutes of the meeting; and<br>f. Conduct a final evaluation by considering the recommendations of the Remuneration and Nomination Committee on the results of the collegial performance assessment of the Board of Commissioners and its committees as well as the individual performance assessment of each member of the Board of Commissioners and members of its committees. | Duties and Responsibilities of the President Director of Bank Sinarmas, namely:<br><br>Responsible for all duties of the Board of Directors by paying attention to the span of control and directing, supervising, and conducting direct evaluations:<br>- Finance & Performance Management Work Unit;<br>- Human Capital Management;<br>- Internal Audit;<br>- Corporate Secretary;<br>- Corporate Liaison; and<br>- Corporate Strategic Program and Development. |

## Penilaian Kinerja Dewan Komisaris dan Direksi [GRI 2-18]

### Prosedur Penilaian Kinerja

Penilaian kinerja Dewan Komisaris dan Direksi secara kolegial dilakukan sebagai bagian dari *self-assessment* GCG. Penilaian tersebut dilakukan secara periodik setiap semester, yaitu posisi penilaian bulan Juni dan Desember pada tahun berjalan, dengan melibatkan Dewan Komisaris, Pihak Independen, Direksi, Pejabat Eksekutif dan fungsi-fungsi independen, yang dikoordinasi oleh Satuan Kerja kepatuhan.

Sementara itu, penilaian kinerja Dewan Komisaris secara individu dilakukan setiap tahun oleh Komisaris Utama berdasarkan tolak ukur yang telah disepakati oleh masing-masing anggota Dewan Komisaris. Penilaian kinerja Direksi secara individu dilakukan oleh Dewan Komisaris dengan melibatkan Komite Remunerasi dan Nominasi.

### Dasar/Kriteria Penilaian Kinerja

Penilaian kinerja Dewan Komisaris dilakukan dengan mempertimbangkan beberapa hal, seperti:

1. Struktur dan komposisi Dewan Komisaris;
2. Efektivitas pelaksanaan program kerja komite-komite di bawah Dewan Komisaris;
3. Pengawasan pelaksanaan strategi dan pengelolaan perusahaan;
4. Penerapan tata kelola perusahaan yang baik; dan
5. Penerapan manajemen risiko dan pengendalian internal dalam menghadapi potensi risiko.

Sementara itu, penilaian kinerja Direksi dilakukan dengan memperhatikan beberapa aspek, yakni:

1. Penetapan target Bank;
2. Penyusunan strategi dan rencana bisnis Bank ke depannya;
3. Implementasi strategi pengelolaan Bank;
4. Penerapan kebijakan pengendalian internal dan manajemen risiko.

### Hasil Penilaian Kinerja

Hasil *self-assessment* GCG Dewan Komisaris dan Direksi tahun 2024 menunjukkan nilai komposit 2 atau "Baik". Hasil evaluasi kinerja terhadap Dewan Komisaris dan Direksi kemudian disampaikan kepada Pemegang Saham melalui mekanisme RUPS dalam bentuk Laporan Tugas Pengawasan Dewan Komisaris dan Laporan Direksi Bank. Laporan-laporan tersebut selanjutnya menjadi dasar pertimbangan Komite Remunerasi dan Nominasi dalam memberikan rekomendasi kepada Dewan Komisaris untuk mengangkat kembali anggota Dewan Komisaris dan Direksi serta sebagai bahan pertimbangan untuk menyusun struktur remunerasi.

## Performance Assessment of the Board of Commissioners and the Board of Directors [GRI 2-18]

### Performance Assessment Procedure

The collegial performance assessment of the Board of Commissioners and Board of Directors is carried out as part of the GCG self-assessment. The assessment is carried out periodically every semester, namely the assessment positions in June and December in the current year, involving the Board of Commissioners, Independent Parties, Board of Directors, Executive Officers, and independent functions, which are coordinated by the Compliance Work Unit.

Meanwhile, the individual performance assessment of the Board of Commissioners is carried out annually by the President Commissioner based on benchmarks that have been agreed upon by each member of the Board of Commissioners. The individual performance assessment of the Board of Directors is carried out by the Board of Commissioners by involving the Remuneration and Nomination Committee.

### Basis/Criteria for Performance Assessment

The performance assessment of the Board of Commissioners is carried out by considering several things, such as:

1. Structure and composition of the Board of Commissioners;
2. Effectiveness of the implementation of the work programs of the committees under the Board of Commissioners;
3. Supervision of the implementation of the company's strategy and management;
4. Implementation of good corporate governance; and
5. Implementation of risk management and internal control in dealing with potential risks.

Meanwhile, the Board of Directors' performance assessment is carried out by considering several aspects, namely:

1. Determination of the Bank's targets;
2. Preparation of the Bank's future strategies and business plans;
3. Implementation of the Bank's management strategy;
4. Implementation of internal control and risk management policies.

### Performance Assessment Results

The results of the GCG self-assessment of the Board of Commissioners and Board of Directors in 2024 showed a composite value of 2 or "Good". The results of the performance evaluation of the Board of Commissioners and Board of Directors were then submitted to Shareholders through the GMS mechanism in the form of the Board of Commissioners Supervisory Task Report and the Bank's Board of Directors Report. These reports then become the basis for consideration by the Remuneration and Nomination Committee in providing recommendations to the Board of Commissioners to reappoint members of the Board of Commissioners and Board of Directors and as a consideration for compiling the remuneration structure.

## Pelaksanaan Rapat Dewan Komisaris dan Direksi

### Rapat Dewan Komisaris

Sesuai ketentuan Peraturan Otoritas Jasa Keuangan No. 17 tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum, Dewan Komisaris wajib menyelenggarakan rapat internal paling sedikit 1 (satu) kali dalam 2 (dua) bulan. Namun, rapat tersebut dapat dilangsungkan apabila dihadiri mayoritas dari seluruh anggota Dewan Komisaris.

Selain itu, Dewan Komisaris wajib mengadakan rapat bersama Direksi secara berkala setidaknya 1 (satu) kali dalam 4 (empat) bulan. Pada tahun 2024, Dewan Komisaris telah menyelenggarakan sebanyak 6 (enam) kali rapat internal dan 11 kali rapat gabungan bersama Direksi, dengan tingkat kehadiran sebagai berikut.

## Implementation of Board of Commissioners and Board of Directors Meetings

### Board of Commissioners Meeting

In accordance with the provisions of the Financial Services Authority Regulation No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks, the Board of Commissioners is required to hold internal meetings at least once every 2 (two) months. However, the meeting can be held if attended by a majority of all members of the Board of Commissioners.

In addition, the Board of Commissioners is required to hold regular meetings with the Board of Directors at least once every 4 (four) months. In 2024, the Board of Commissioners held 6 (six) internal meetings and 11 joint meetings with the Board of Directors, with the following attendance levels.

| Nama<br>Name | Jabatan<br>Position | Rapat Internal Dewan Komisaris<br>Internal Meeting of the Board of Commissioners | | | Rapat Gabungan dengan Direksi<br>Joint Meeting with the Board of Directors | | | RUPS | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | Jumlah Rapat<br>Number of Meetings | Jumlah Kehadiran<br>Number of Attendance | Tingkat Kehadiran (%)<br>Attendance Level (%) | Jumlah Rapat<br>Number of Meetings | Jumlah Kehadiran<br>Number of Attendance | Tingkat Kehadiran (%)<br>Attendance Level (%) | Jumlah Rapat<br>Number of Meetings | Jumlah Kehadiran<br>Number of Attendance | Tingkat Kehadiran (%)<br>Attendance Level (%) |
| Tjendrawati Widjaja | Komisaris Utama<br>President Commissioner | 6 | 6 | 100 | 11 | 11 | 100 | 2 | 2 | 100 |
| Sammy Kristamuljana | Komisaris Independen<br>Independent Commissioner | 6 | 6 | 100 | 11 | 11 | 100 | 2 | 2 | 100 |
| Rusmin | Komisaris Independen<br>Independent Commissioner | 6 | 6 | 100 | 11 | 11 | 100 | 2 | 1 | 50 |

Informasi mengenai pelaksanaan rapat Dewan Komisaris, mulai dari tanggal, peserta, dan agenda diungkapkan pada tabel berikut.

Information regarding the implementation of the Board of Commissioners meeting, starting from the date, participants, and agenda is disclosed in the following table.

| Tanggal<br>Date | Peserta<br>Participant | Agenda |
|---|---|---|
| 12 Februari 2024<br>February 12, 2024 | - Tjendrawati Widjaja<br>- Sammy Kristamuljana<br>- Rusmin | 1. Human Capital<br>2. Tindak Lanjut Temuan Satuan Kerja Audit Intern (SKAI)<br>3. Profil Risiko Bank & UUS Posisi 31 Desember 2023<br>1. Human Capital<br>2. Follow-up on Internal Audit Work Unit (SKAI) Findings<br>3. Bank & UUS Risk Profile Position December 31, 2023 |
| 30 April 2024<br>April 30, 2024 | - Tjendrawati Widjaja<br>- Sammy Kristamuljana<br>- Rusmin | 1. Human Capital<br>2. Tindak Lanjut Temuan Satuan Kerja Audit Intern (SKAI)<br>3. Profil Risiko Bank & UUS Posisi 31 Maret 2024<br>1. Human Capital<br>2. Follow-up on Internal Audit Work Unit (SKAI) Findings<br>3. Bank & UUS Risk Profile Position March 31, 2024 |
| 12 Juni 2024<br>June 12, 2024 | - Tjendrawati Widjaja<br>- Sammy Kristamuljana<br>- Rusmin | 1. Masa Jabatan Komite<br>2. Tugas dan Tanggung Jawab Komite<br>1. Term of Office of the Committee<br>2. Duties and Responsibilities of the Committee |

| Tanggal<br>Date | Peserta<br>Participant | Agenda |
|---|---|---|
| 30 Agustus 2024<br>August 30, 2024 | - Tjendrawati Widjaja<br>- Sammy Kristamuljana<br>- Rusmin | 1. Human Capital<br>2. Tindak Lanjut Temuan Internal<br>3. Tindak Lanjut Temuan Eksternal<br>4. IT Security dan Penerapan Data Governance di Bank Sinarmas<br>5. Profil Risiko Bank & UUS Posisi 30 Juni 2024<br>6. Overview Penanganan Restrukturisasi Kredit Bermasalah Periode 31 Juli 2024<br>1. Human Capital<br>2. Follow-up on Internal Findings<br>3. Follow-up on External Findings<br>4. IT Security and Implementation of Data Governance at Bank Sinarmas<br>5. Bank & UUS Risk Profile Position June 30, 2024<br>6. Overview of Handling of Non-Performing Loan Restructuring Period July 31, 2024 |
| 31 Oktober 2024<br>October 31, 2024 | - Tjendrawati Widjaja<br>- Sammy Kristamuljana<br>- Rusmin | 1. Human Capital<br>2. Tindak Lanjut Temuan Internal<br>3. Tindak Lanjut Temuan Eksternal<br>4. Laporan Penerapan Strategi Anti Fraud PT. Bank Sinarmas Tbk. Periode Triwulan II dan III Tahun 2024 (SAF)<br>5. Evaluasi Risiko terkait Transaksi di Treasury (Risiko Pasar, Likuiditas & Operasional)<br>1. Human Capital<br>2. Follow-up on Internal Findings<br>3. Follow-up on External Findings<br>4. Report on the Implementation of PT. Bank Sinarmas Tbk's. Anti-Fraud Strategy for the Second and Third Quarters of 2024 (SAF)<br>5. Evaluation of Risks Related to Transactions in Treasury (Market, Liquidity & Operational Risks) |
| 23 Desember 2024<br>December 23, 2024 | - Tjendrawati Widjaja<br>- Sammy Kristamuljana<br>- Rusmin | 1. Rencana Audit Laporan Keuangan PT. Bank Sinarmas Tbk. Tahun 2024<br>2. Annual Audit Plan 2025<br>1. Financial Statement Audit Plan of PT. Bank Sinarmas Tbk. Year 2024<br>2. Annual Audit Plan 2025 |



## Rapat Direksi

Sesuai ketentuan Peraturan Otoritas Jasa Keuangan No. 17 tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum, Direksi wajib menyelenggarakan rapat internal paling sedikit 1 kali dalam setiap bulan, serta rapat bersama Dewan Komisaris setidaknya 1 kali dalam 4 bulan. Direksi wajib menghadiri kedua rapat tersebut. Apabila berhalangan hadir, maka wajib memberitahukan kepada Direksi lainnya/ *Corporate Secretary*. Pada tahun 2024, Direksi telah menyelenggarakan sebanyak 19 kali rapat internal dan 11 kali rapat gabungan bersama Dewan Komisaris, dengan tingkat kehadiran sebagai berikut.

## Board of Directors Meeting

In accordance with the provisions of Financial Services Authority Regulation No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks, the Board of Directors is required to hold an internal meeting at least once a month and a joint meeting with the Board of Commissioners at least once every 4 months. The Board of Directors is required to attend both meetings. If unable to attend, it is mandatory to notify the other Board of Directors/ Corporate Secretary. In 2024, the Board of Directors held 19 internal meetings and 11 joint meetings with the Board of Commissioners, with the following attendance levels.

| Nama<br>Name | Jabatan<br>Position | Rapat Internal Direksi<br>Internal Meeting of the Board of Directors | | | Rapat Gabungan dengan Dewan Komisaris<br>Joint Meeting with the Board of Commissioners | | | RUPS<br>GMS | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | Jumlah Rapat<br>Number of Meetings | Jumlah Kehadiran<br>Number of Attendance | Tingkat Kehadiran (%)<br>Attendance Level (%) | Jumlah Rapat<br>Number of Meetings | Jumlah Kehadiran<br>Number of Attendance | Tingkat Kehadiran (%)<br>Attendance Level (%) | Jumlah Rapat<br>Number of Meetings | Jumlah Kehadiran<br>Number of Attendance | Tingkat Kehadiran (%)<br>Attendance Level (%) |
| Frenky Tirtowijoyo | Direktur Utama<br>President Director | 19 | 16 | 84 | 11 | 11 | 100 | 2 | 2 | 100 |
| Miko Andidjaja | Direktur *Retail Banking*<br>Director of Retail Banking | 19 | 17 | 89 | 11 | 10 | 91 | 2 | 2 | 100 |
| Ekajaya Ongny Putra | Direktur *Lending & Wholesale Banking*<br>Director of Lending & Wholesale Banking | 19 | 16 | 84 | 11 | 10 | 91 | 2 | 1 | 50 |

| Nama<br>Name | Jabatan<br>Position | Rapat Internal Direksi<br>Internal Meeting of the Board of Directors | | | Rapat Gabungan dengan Dewan Komisaris<br>Joint Meeting with the Board of Commissioners | | | RUPS<br>GMS | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | Jumlah Rapat<br>Number of Meetings | Jumlah Kehadiran<br>Number of Attendance | Tingkat Kehadiran (%)<br>Attendance Level (%) | Jumlah Rapat<br>Number of Meetings | Jumlah Kehadiran<br>Number of Attendance | Tingkat Kehadiran (%)<br>Attendance Level (%) | Jumlah Rapat<br>Number of Meetings | Jumlah Kehadiran<br>Number of Attendance | Tingkat Kehadiran (%)<br>Attendance Level (%) |
| Enny Kamal | Direktur *Consumer Business*<br>Director of Consumer Business | 19 | 18 | 95 | 11 | 11 | 100 | 2 | 2 | 100 |
| Sendy | Direktur *Information Technology & Digital Experience*<br>Director of Information Technology & Digital Experience | 19 | 18 | 95 | 11 | 11 | 100 | 2 | 2 | 100 |
| Amandalia Johanes* | Direktur *Compliance & Risk Management*<br>Director of Compliance & Risk Management | 3 | 2 | 1 | 11 | 1 | 100 | 2 | - | - |

*: Diangkat melalui RUPS Luar Biasa, 28 Oktober 2024
*: Appointed through Extraordinary GMS, October 28, 2024

Informasi mengenai pelaksanaan rapat Direksi, mulai dari tanggal, peserta, dan agenda diungkapkan pada tabel berikut.

Information regarding the implementation of the Board of Directors meeting, starting from the date, participants, and agenda is disclosed in the following table.

| Tanggal<br>Date | Peserta<br>Participant | Agenda |
|---|---|---|
| 11 Januari 2024<br>January 11, 2024 | - Frenky Tirtowijoyo<br>- Ekajaya Ongny Putra<br>- Enny Kamal<br>- Sendy | 1. Consumer Loan<br>2. Payment & Transaction<br>3. Performance Report Treasury & FI<br>4. New Product Way of Working - IT |
| 18 Januari 2024<br>January 18, 2024 | - Frenky Tirtowijoyo<br>- Miko Andidjaja<br>- Ekajaya Ongny Putra<br>- Enny Kamal<br>- Sendy | 1. Kartu Kredit<br>2. Micro Small & Medium Enterprise Business<br>3. Deposit Product<br>1. Credit Card<br>2. Micro Small & Medium Enterprise Business<br>3. Deposit Product |
| 1 Februari 2024<br>February 1, 2024 | - Frenky Tirtowijoyo<br>- Miko Andidjaja<br>- Enny Kamal<br>- Sendy | 1. Dashboard & Report Automation Shares<br>2. Priority Banking |
| 15 Februari 2024<br>February 15, 2024 | - Frenky Tirtowijoyo<br>- Ekajaya Ongny Putra<br>- Enny Kamal<br>- Sendy | 1. Priority Banking<br>2. Project Initiatives Corporate Banking<br>3. Unified Registration (UR) and Branch & Operation System (BOS)<br>4. Payment & Transaction<br>5. Penyusunan KPI BOD tahun 2024<br>1. Priority Banking<br>2. Project Initiatives Corporate Banking<br>3. Unified Registration (UR) and Branch & Operation System (BOS)<br>4. Payment & Transactions<br>5. Preparation of BOD KPIs in 2024 |

| Tanggal<br>Date | Peserta<br>Participant | Agenda |
|---|---|---|
| 14 Maret 2024<br>March 14, 2024 | - Frenky Tirtowijoyo<br>- Miko Andidjaja<br>- Ekajaya Ongny Putra<br>- Enny Kamal<br>- Sendy | 1. Materi Entry Meeting dengan Regulator<br>1. Entry Meeting Material with Regulators |
| 18 April 2024<br>April 18, 2024 | - Frenky Tirtowijoyo<br>- Ekajaya Ongny Putra<br>- Enny Kamal<br>- Sendy | 1. Artificial Intelligence (AI) untuk KTA<br>2. Customer Centricity Project<br>3. Rencana Contact Center Telemarketing & Consumer Protection Tahun 2024<br>4. Security Services<br>1. Artificial Intelligence (AI) for KTA<br>2. Customer Centricity Project<br>3. Telemarketing & Consumer Protection Contact Center Plan 2024<br>4. Security Services |
| 30 Mei 2024<br>May 30, 2024 | - Frenky Tirtowijoyo<br>- Miko Andidjaja<br>- Ekajaya Ongny Putra<br>- Enny Kamal<br>- Sendy | 1. Product Workshop 2024<br>2. Simobi Plus Marketing Plan<br>3. Kinerja Bisnis Digital Sales & Marketing<br>4. Product Deposit & Investment Periode April 2024<br>1. Product Workshop 2024<br>2. Simobi Plus Marketing Plan<br>3. Digital Sales & Marketing Business Performance<br>4. Product Deposit & Investment Period April 2024 |
| 13 Juni 2024<br>June 13, 2024 | - Frenky Tirtowijoyo<br>- Ekajaya Ongny Putra<br>- Enny Kamal<br>- Sendy | 1. Struktur Organisasi<br>2. Investment Product Plan Simobi Plus<br>3. Kesiapan Pelaksanaan UU PDP<br>4. Kick-off Project Data Stakeholders, Business Glossary and Data Lineage Formation<br>1. Organizational Structure<br>2. Simobi Plus Investment Product Plan<br>3. Readiness for the Implementation of the PDP Law<br>4. Kick-off Project Data Stakeholders, Business Glossary and Data Lineage Formation |
| 27 Juni 2024<br>June 27, 2024 | - Frenky Tirtowijoyo<br>- Ekajaya Ongny Putra<br>- Enny Kamal<br>- Sendy | 1. Update project IT - Product Workshop Mid 2024<br>2. Credit Administration Control<br>3. Agent Banking |
| 4 Juli 2024<br>July 4, 2024 | - Frenky Tirtowijoyo<br>- Miko Andidjaja<br>- Ekajaya Ongny Putra<br>- Enny Kamal<br>- Sendy | 1. Pemeriksaan Regulator Kredit<br>2. Service Quality<br>3. HUT Bank ke 35<br>1. Credit Regulator Examination<br>2. Service Quality<br>3. Bank's 35th Anniversary |
| 11 Juli 2024<br>July 11, 2024 | - Frenky Tirtowijoyo<br>- Miko Andidjaja<br>- Ekajaya Ongny Putra<br>- Enny Kamal<br>- Sendy | 1. Hasil pemeriksaan regulator - IT, Market Liquidity dan Treasury<br>2. Consumer Loan<br>3. Micro Small and Medium Enterprise Business<br>1. Regulatory inspection results - IT, Market Liquidity and Treasury<br>2. Consumer Loans<br>3. Micro Small and Medium Enterprise Business |
| 15 Agustus 2024<br>August 15, 2024 | - Miko Andidjaja<br>- Ekajaya Ongny Putra<br>- Enny Kamal<br>- Sendy | 1. Business Performance Channeling & Joint Financing<br>2. Contact Center Platform<br>3. IT Projects Update |
| 12 September 2024<br>September 12, 2024 | - Frenky Tirtowijoyo<br>- Miko Andidjaja<br>- Ekajaya Ongny Putra<br>- Sendy | 1. APU PPT & PPPSPM<br>2. Pusat Penanganan Penipuan Transaksi Keuangan (PUSAKA)<br>3. Treasury & FI<br>4. MSME Performance<br>1. APU PPT & PPPSPM<br>2. Financial Transaction Fraud Handling Center (PUSAKA)<br>3. Treasury & FI<br>4. MSME Performance |
| 19 September 2024<br>September 19, 2024 | - Frenky Tirtowijoyo<br>- Miko Andidjaja<br>- Ekajaya Ongny Putra<br>- Enny Kamal<br>- Sendy | 1. ATM Machine<br>2. Brand Health Tracking plan<br>3. Update Project IT |
| 3 Oktober 2024<br>October 3, 2024 | - Frenky Tirtowijoyo<br>- Miko Andidjaja<br>- Enny Kamal<br>- Sendy | 1. Kartu Kredit<br>2. Payment & Transaction<br>3. Company Device untuk Mobile Workforce<br>1. Credit Card<br>2. Payment & Transaction<br>3. Company Device for Mobile Workforce |

| Tanggal<br>Date | Peserta<br>Participant | Agenda |
|---|---|---|
| 17 Oktober 2024<br>October 17, 2024 | - Frenky Tirtowijoyo<br>- Miko Andidjaja<br>- Ekajaya Ongny Putra<br>- Enny Kamal | 1. Securities Service Financial Performance as of September 2024<br>2. Corporate Banking Business Solution<br>3. Consent Penawaran Produk/Layanan ke Sarana Komunikasi Pribadi<br>4. Employee engagement survey bank sinarmas<br>5. Perubahan syarat penilaian kinerja untuk promosi<br>6. Lain-lain (terkait pelaksanaan undang-undang perlindungan data pribadi)<br>1. Securities Service Financial Performance as of September 2024<br>2. Corporate Banking Business Solution<br>3. Consent to Product/Service Offerings to Personal Communication Facilities<br>4. Bank Sinarmas Employee Engagement Survey<br>5. Changes to Performance Assessment Requirements for Promotion<br>6. Others (Related to the Implementation of Personal Data Protection Law) |
| 31 Oktober 2024<br>October 31, 2024 | - Frenky Tirtowijoyo<br>- Ekajaya Ongny Putra<br>- Enny Kamal<br>- Sendy<br>- Amandalia Johanes | 1. IT Service Survey Result H2 2024<br>2. IT Project Update<br>3. Sales Management System<br>4. Program Nasabah Prioritas<br>5. Update Journey Increase<br>1. IT Service Survey Results H2 2024<br>2. IT Project Update<br>3. Sales Management System<br>4. Priority Customer Program<br>5. Update Journey Increase |
| 14 November 2024<br>November 14, 2024 | - Frenky Tirtowijoyo<br>- Miko Andidjaja<br>- Ekajaya Ongny Putra<br>- Enny Kamal<br>- Sendy | 1. Consumer Loan<br>2. Deposit Investment Insurance & Customer Care<br>3. Branch & Acquisition Initiatives 2025<br>4. Card Management System<br>1. Consumer Loans<br>2. Deposit Investment Insurance & Customer Care<br>3. Branch & Acquisition Initiatives 2025<br>4. Card Management System |
| 12 Desember 2024<br>December 12, 2024 | - Miko Andidjaja<br>- Ekajaya Ongny Putra<br>- Enny Kamal<br>- Sendy<br>- Amandalia Johanes | 1. Credit Management<br>2. Document Approval System (DASI) |

Informasi mengenai pelaksanaan rapat Direksi bersama Dewan Komisaris, mulai dari tanggal, peserta, dan agenda diungkapkan pada tabel berikut.

Information regarding the implementation of the Board of Directors' meeting with the Board of Commissioners, starting from the date, participants, and agenda is disclosed in the following table.

| Tanggal<br>Date | Peserta<br>Participant | Agenda |
|---|---|---|
| 25 Januari 2024<br>January 25, 2024 | Direksi<br>Board of Directors<br>- Frenky Tirtowijoyo<br>- Miko Andidjaja<br>- Ekajaya Ongny Putra<br>- Enny Kamal<br>- Sendy<br>Dewan Komisaris<br>Board of Commissioners<br>- Tjendrawati Widjaja<br>- Sammy Kristamuljana<br>- Rusmin | 1. Kinerja Bank Periode Desember 2023<br>2. Update Internal Audit<br>3. Treasury & FI<br>4. Corporate Banking Business Solution<br>5. Penanganan Kredit Bermasalah<br>1. Bank Performance for the Period of December 2023<br>2. Internal Audit Update<br>3. Treasury & FI<br>4. Corporate Banking Business Solution<br>5. Handling of Non-Performing Loan |

| Tanggal<br>Date | Peserta<br>Participant | Agenda |
|---|---|---|
| 22 Februari 2024<br>February 22, 2024 | Direksi<br>Board of Directors<br>- Frenky Tirtowijoyo<br>- Miko Andidjaja<br>- Ekajaya Ongny Putra<br>- Enny Kamal<br>- Sendy<br>Dewan Komisaris<br>Board of Commissioners<br>- Tjendrawati Widjaja<br>- Sammy Kristamuljana<br>- Rusmin | 1. Deklarasi Anti Fraud Manajemen dan Komite Anti Fraud<br>2. Kinerja Bank Periode Januari 2024<br>3. Compliance Update<br>4. Simobi Plus<br>1. Anti-Fraud Management Declaration and Anti-Fraud Committee<br>2. Bank Performance for January 2024<br>3. Compliance Update<br>4. Simobi Plus |
| 21 Maret 2024<br>March 21, 2024 | Direksi<br>Board of Directors<br>- Frenky Tirtowijoyo<br>- Miko Andidjaja<br>- Ekajaya Ongny Putra<br>- Enny Kamal<br>- Sendy<br>Dewan Komisaris<br>Board of Commissioners<br>- Tjendrawati Widjaja<br>- Sammy Kristamuljana<br>- Rusmin | 1. Human Capital Management<br>2. Kinerja Bank Periode Februari 2024<br>3. Kantor Cabang Rugi<br>1. Human Capital Management<br>2. Bank Performance for February 2024<br>3. Branch Office Loss |
| 23 April 2024<br>April 23, 2024 | Direksi<br>Board of Directors<br>- Frenky Tirtowijoyo<br>- Miko Andidjaja<br>- Ekajaya Ongny Putra<br>- Enny Kamal<br>- Sendy<br>Dewan Komisaris<br>Board of Commissioners<br>- Tjendrawati Widjaja<br>- Sammy Kristamuljana<br>- Rusmin | 1. Kinerja PT Bank Nano Syariah Periode 31 Maret 2024<br>2. Laporan Akhir Pendampingan Pemisahan Unit Usaha Syariah<br>3. Kinerja Bank Periode Maret 2024<br>4. Kantor Cabang Rugi<br>5. Sales Productivity<br>1. Performance of PT Bank Nano Syariah for the Period of March 31, 2024<br>2. Final Report on Assistance for the Separation of Sharia Business Units<br>3. Bank Performance for the Period of March 2024<br>4. Branch Office Loss<br>5. Sales Productivity |
| 16 Mei 2024<br>May 16, 2024 | Direksi<br>Board of Directors<br>- Frenky Tirtowijoyo<br>- Miko Andidjaja<br>- Ekajaya Ongny Putra<br>- Enny Kamal<br>- Sendy<br>Dewan Komisaris<br>Board of Commissioners<br>- Tjendrawati Widjaja<br>- Sammy Kristamuljana<br>- Rusmin | 1. Internal Audit<br>2. Laporan Penerapan Strategi Anti Fraud<br>3. Compliance Update<br>4. Penanganan Kredit Bermasalah<br>5. Kinerja Bank Periode April 2024<br>1. Internal Audit<br>2. Anti-Fraud Strategy Implementation Report<br>3. Compliance Update<br>4. Handling of Non-Performing Loan<br>5. Bank Performance for the Period of April 2024 |
| 20 Juni 2024<br>June 20, 2024 | Direksi<br>Board of Directors<br>- Frenky Tirtowijoyo<br>- Miko Andidjaja<br>- Enny Kamal<br>- Sendy<br>Dewan Komisaris<br>Board of Commissioners<br>- Tjendrawati Widjaja<br>- Sammy Kristamuljana<br>- Rusmin | 1. Penuangan celengan bambu<br>2. Update pemeriksaan cabang oleh OJK<br>3. Kinerja Bank Periode Mei 2024<br>4. Revisi Rencana Bisnis Bank 2024 - 2026<br>1. Pouring of bamboo piggy banks<br>2. Update on branch inspection by OJK<br>3. Bank Performance for the Period of May 2024<br>4. Revision of the Bank's Business Plan 2024 - 2026 |
| 25 Juli 2024<br>July 25, 2024 | Direksi<br>Board of Directors<br>- Frenky Tirtowijoyo<br>- Ekajaya Ongny Putra<br>- Enny Kamal<br>- Sendy<br>Dewan Komisaris<br>Board of Commissioners<br>- Tjendrawati Widjaja<br>- Sammy Kristamuljana<br>- Rusmin | 1. Summary pemeriksaan regulator<br>2. Kinerja Bank Periode Juni 2024<br>3. Pemeriksaan Internal Audit<br>4. Kesiapan IT Kasus Kebongkaran Data, Ransomware, Serangan Fiber<br>5. Laporan Kinerja PT Bank Nano Syariah Periode Juni 2024<br>6. Perubahan Sinergi dengan Anak usaha<br>7. Recovery dan Resolution Plan<br>1. Summary of regulator audit<br>2. Bank Performance for June 2024<br>3. Internal Audit Examination<br>4. IT Readiness for Data Breach Cases, Ransomware, Fiber Attacks<br>5. PT Bank Nano Syariah Performance Report for June 2024<br>6. Changes in Synergy with Subsidiaries<br>7. Recovery and Resolution Plan |

| Tanggal<br>Date | Peserta<br>Participant | Agenda |
|---|---|---|
| 29 Agustus 2024<br>August 29, 2024 | Direksi<br>Board of Directors<br>- Frenky Tirtowijoyo<br>- Miko Andidjaja<br>- Ekajaya Ongny Putra<br>- Enny Kamal<br>- Sendy<br>Dewan Komisaris<br>Board of Commissioners<br>- Tjendrawati Widjaja<br>- Sammy Kristamuljana<br>- Rusmin | 1. Kinerja Bank Periode Juli 2024 & Product Profitability<br>2. Branch Performance July 2024<br>3. Perkara Hukum<br>4. Laporan Implementasi Perlindungan Nasabah & Masyarakat<br>5. Rasio Pendanaan Luar Negeri (RPLN)<br>6. Rencana Kerja Procurement<br>7. ID Card Karyawan<br>1. Bank Performance July 2024 & Product Profitability<br>2. Branch Performance July 2024<br>3. Legal Cases<br>4. Customer & Community Protection Implementation Report<br>5. Foreign Funding Ratio (RPLN)<br>6. Procurement Work Plan<br>7. Employee ID Card |
| 26 September 2024<br>September 26, 2024 | Direksi<br>Board of Directors<br>- Frenky Tirtowijoyo<br>- Miko Andidjaja<br>- Ekajaya Ongny Putra<br>- Enny Kamal<br>- Sendy<br>Dewan Komisaris<br>Board of Commissioners<br>- Tjendrawati Widjaja<br>- Sammy Kristamuljana<br>- Rusmin | 1. Sosialisasi relawan Tzu Chi Bank Sinarmas<br>2. Kinerja Bank Periode Juli 2024 & Product Profitability<br>3. Monthly Branch Strategy & Sales Productivity<br>4. Rencana Kerja Priority Banking<br>5. Penanganan Kredit Bermasalah<br>6. APU, PPT & PPSM<br>1. Socialization of Tzu Chi Bank Sinarmas volunteers<br>2. Bank Performance for July 2024 & Product Profitability<br>3. Monthly Branch Strategy & Sales Productivity<br>4. Priority Banking Work Plan<br>5. Handling of Problematic Credit<br>6. APU, PPT & PPSM |
| 24 Oktober 2024<br>October 24, 2024 | Direksi<br>Board of Directors<br>- Frenky Tirtowijoyo<br>- Miko Andidjaja<br>- Ekajaya Ongny Putra<br>- Enny Kamal<br>- Sendy<br>Dewan Komisaris<br>Board of Commissioners<br>- Tjendrawati Widjaja<br>- Sammy Kristamuljana<br>- Rusmin | 1. Laporan Kinerja PT Bank Nano Syariah Periode September 2024<br>2. Kinerja Bank Periode September 2024<br>3. Update Progres Internal Audit Group<br>4. Consent Penawaran Produk/Layanan ke sarana komunikasi pribadi<br>5. Penyelesaian kredit bermasalah<br>6. Struktur Organisasi<br>7. Rencana Kerja Direktur Kepatuhan<br>1. PT Bank Nano Syariah Performance Report for September 2024 Period<br>2. Bank Performance for September 2024 Period<br>3. Internal Audit Group Progress Update<br>4. Consent for Product/Service Offerings to Personal Communication Facilities<br>5. Settlement of Non-Performing Loan<br>6. Organizational Structure<br>7. Compliance Director Work Plan |
| 21 November 2024<br>November 21, 2024 | Direksi<br>Board of Directors<br>- Frenky Tirtowijoyo<br>- Miko Andidjaja<br>- Ekajaya Ongny Putra<br>- Enny Kamal<br>- Sendy<br>- Amandalia Johanes*<br>Dewan Komisaris<br>Board of Commissioners<br>- Tjendrawati Widjaja<br>- Sammy Kristamuljana<br>- Rusmin | 1. Kinerja Bank Periode 2024<br>2. Rencana Bisnis Bank<br>3. Brand Ambassador<br>4. Performance Cabang<br>5. Produk Productivity<br>6. Literasi Keuangan<br>7. Laporan Rencana Aksi Pemulihan (Recovery Plan) Tahun 2024<br>8. Laporan Rencana Resolusi Tahun 2024<br>9. Update Indikasi Kasus Peretasan di Sektor Perbankan<br>10. Priority Banking<br>1. Bank Performance Period 2024<br>2. Bank Business Plan<br>3. Brand Ambassador<br>4. Branch Performance<br>5. Product Productivity<br>6. Financial Literacy<br>7. Recovery Plan Report 2024<br>8. Resolution Plan Report 2024<br>9. Update on Indications of Hacking Cases in the Banking Sector<br>10. Priority Banking |

*: Diangkat melalui RUPS Luar Biasa, 28 Oktober 2024
*: Appointed through Extraordinary GMS, October 28, 2024

## Hubungan Afiliasi Dewan Komisaris, Direksi, Pemegang Saham Utama dan/atau Pengendali

Bank senantiasa menjaga independensi anggota Dewan Komisaris dan Direksi. Komitmen ini bertujuan untuk mengurangi risiko benturan kepentingan, memastikan pelaksanaan tugas dan tanggung jawab dilakukan secara mandiri dan kritis, termasuk terhadap Pemegang Saham Pengendali.

## Affiliated Relationship of the Board of Commissioners, Board of Directors, Majority and/or Controlling Shareholders

The Bank always maintains the independence of the members of the Board of Commissioners and Board of Directors. This commitment aims to reduce the risk of conflict of interest and ensure that the implementation of duties and responsibilities is carried out independently and critically, including towards Controlling Shareholders.

## Hubungan Afiliasi Dewan Komisaris
### Affiliated Relationship of the Board of Commissioners

| Nama<br>Name | Jabatan<br>Position | Hubungan Keluarga dengan<br>Familial Relationhsip with | | | | | | Hubungan Keuangan dengan<br>Financial Relationship with | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | **Dewan Komisaris**<br>Board of Commissioner | | **Direksi**<br>Board of Directors | | **Pemegang Saham Pengendali**<br>Controlling Shareholder | | **Dewan Komisaris**<br>Board of Commissioner | | **Direksi**<br>Board of Directors | | **Pemegang Saham Pengendali**<br>Controlling Shareholder | |
| | | **Ya**<br>Yes | **Tidak**<br>No | **Ya**<br>Yes | **Tidak**<br>No | **Ya**<br>Yes | **Tidak**<br>No | **Ya**<br>Yes | **Tidak**<br>No | **Ya**<br>Yes | **Tidak**<br>No | **Ya**<br>Yes | **Tidak**<br>No |
| Tjendrawati Widjaja | Komisaris Utama<br>President Commissioner | - | √ | - | √ | - | √ | - | √ | - | √ | - | √ |
| Sammy Kristamuljana | Komisaris Independen<br>Independent Commissioner | - | √ | - | √ | - | √ | - | √ | - | √ | - | √ |
| Rusmin | Komisaris Independen<br>Independent Commissioner | - | √ | - | √ | - | √ | - | √ | - | √ | - | √ |

## Hubungan Afiliasi Direksi
### Affiliated Relationship of the Board of Directors

| Nama<br>Name | Jabatan<br>Position | Hubungan Keluarga dengan<br>Familial Relationhsip with | | | | | | Hubungan Keuangan dengan<br>Financial Relationship with | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | **Dewan Komisaris**<br>Board of Commissioner | | **Direksi**<br>Board of Directors | | **Pemegang Saham Pengendali**<br>Controlling Shareholder | | **Dewan Komisaris**<br>Board of Commissioner | | **Direksi**<br>Board of Directors | | **Pemegang Saham Pengendali**<br>Controlling Shareholder | |
| | | **Ya**<br>Yes | **Tidak**<br>No | **Ya**<br>Yes | **Tidak**<br>No | **Ya**<br>Yes | **Tidak**<br>No | **Ya**<br>Yes | **Tidak**<br>No | **Ya**<br>Yes | **Tidak**<br>No | **Ya**<br>Yes | **Tidak**<br>No |
| Frenky Tirtowijoyo | Direktur Utama<br>President Director | - | √ | - | √ | - | √ | - | √ | - | √ | - | √ |
| Miko Andidjaja | Direktur *Retail Banking*<br>Director of Retail Banking | - | √ | - | √ | - | √ | - | √ | - | √ | - | √ |
| Ekajaya Ongny Putra | Direktur *Lending & Wholesale Banking*<br>Director of Lending & Wholesale Banking | - | √ | - | √ | - | √ | - | √ | - | √ | - | √ |
| Enny Kamal | Direktur *Consumer Business*<br>Director of Consumer Business | - | √ | - | √ | - | √ | - | √ | - | √ | - | √ |
| Sendy | Direktur *Information Technology & Digital Experience*<br>Director of Information Technology & Digital Experience | - | √ | - | √ | - | √ | - | √ | - | √ | - | √ |
| Amandalia Johanes | Direktur *Compliance & Risk Management*<br>Director of Compliance & Risk Management | - | √ | - | √ | - | √ | - | √ | - | √ | - | √ |

## Kebijakan Keberagaman Dewan Komisaris dan Direksi

Kebijakan keberagaman komposisi Dewan Komisaris dan Direksi merujuk pada ketentuan Surat Edaran Otoritas Jasa Keuangan No. 32/SEOJK.04/2015 tentang Pedoman Tata Kelola Perusahaan Terbuka. Dengan demikian, pengangkatan Dewan Komisaris dan Direksi mempertimbangkan faktor keberagaman, seperti keahlian, pengetahuan, dan pengalaman yang dibutuhkan Bank.

Keberagaman dalam komposisi anggota Dewan Komisaris dan Direksi membawa manfaat karena dapat memberikan perspektif yang beragam. Keahlian, latar belakang, pengetahuan, dan pengalaman yang berbeda-beda dari para anggota memperkaya diskusi dan pengambilan keputusan.

Dengan demikian, Bank dapat merespons lebih baik terhadap dinamika pasar, mengidentifikasi peluang, serta mengatasi risiko dengan pendekatan yang komprehensif. Selain itu, keberagaman juga menciptakan lingkungan yang inklusif, mencerminkan nilai-nilai keadilan, dan mendukung terwujudnya tujuan Bank secara holistik.

## Board of Commissioners and Board of Directors Diversity Policy

The policy on the diversity of the composition of the Board of Commissioners and Board of Directors refers to the provisions of the Financial Services Authority Circular Letter No. 32/SEOJK.04/2015 concerning Guidelines for Public Company Governance. Thus, the appointment of the Board of Commissioners and Board of Directors takes into account diversity factors, such as expertise, knowledge, and experience required by the Bank.

Diversity in the composition of members of the Board of Commissioners and Board of Directors brings benefits because it can provide diverse perspectives. The different expertise, backgrounds, knowledge, and experiences of the members enrich discussions and decision-making.

Therefore, the Bank can respond better to market dynamics, identify opportunities, and address risks with a comprehensive approach. In addition, diversity also creates an inclusive environment, reflects the values of justice, and supports the realization of the Bank's objectives holistically.



### Keberagaman Komposisi Anggota Dewan Komisaris
**Diversity of Composition of Members of the Board of Commissioners**

| Aspek Keberagaman<br>Diversity Aspects | Realisasi<br>Realizations |
|---|---|
| Pendidikan<br>Education | Latar belakang pendidikan Dewan Komisaris beragam, mulai dari sarjana sampai magister, dengan kompetensi di bidang ekonomi, akuntansi, dan bisnis.<br>The educational background of the Board of Commissioners is diverse, ranging from undergraduate to master's degrees, with competencies in economics, accounting, and business. |
| Pengalaman Kerja<br>Work Experience | Keberagaman pengalaman kerja Dewan Komisaris, antara lain berasal dari profesional pada perbankan maupun lembaga keuangan non-bank.<br>The diversity of the Board of Commissioners' work experience, among others, comes from professionals in banking and non-bank financial institutions. |
| Usia<br>Age | Usia rata-rata Dewan Komisaris, yakni 60-69 tahun.<br>The average age of the Board of Commissioners is 60-69 years. |
| Jenis Kelamin<br>Gender | Tercatat 1 dari 3 anggota Dewan Komisaris Bank adalah wanita.<br>It is recorded that 1 out of 3 members of the Bank's Board of Commissioners is a woman. |

Informasi data diri Dewan Komisaris selengkapnya dapat dilihat pada bab "Profil Perusahaan" Laporan Tahunan dan Keberlanjutan ini.
Complete personal data information of the Board of Commissioners can be seen in the "Company Profile" chapter of this Annual and Sustainability Report.

### Keberagaman Komposisi Direksi
**Diversity of Composition of the Board of Directors**

| Aspek Keberagaman<br>Diversity Aspects | Realisasi<br>Realizations |
|---|---|
| Pendidikan<br>Education | Latar belakang pendidikan Direksi beragam, mulai dari sarjana sampai magister, dengan kompetensi di bidang administrasi bisnis, akuntansi, ekonomi, dan teknik sipil.<br>The educational background of the Board of Directors is diverse, ranging from bachelor's to master's degrees, with competencies in business administration, accounting, economics, and civil engineering. |
| Pengalaman Kerja<br>Work Experience | Keberagaman pengalaman kerja Dewan Komisaris, antara lain berasal dari profesional pada perbankan maupun lembaga keuangan non-bank.<br>The diversity of the Board of Directors' work experience, among others, comes from professionals in banking and non-bank financial institutions. |
| Usia<br>Age | Usia rata-rata Direksi, yakni 36-57 tahun.<br>The average age of the Board of Directors is 36-57 years. |
| Jenis Kelamin<br>Gender | Tercatat 2 dari 6 anggota Direksi Bank adalah wanita.<br>It is recorded that 2 out of 6 members of the Bank's Board of Directors are women. |

Informasi data diri Direksi selengkapnya dapat dilihat pada bab Profil Perusahaan Laporan Tahunan dan Keberlanjutan ini.
Complete personal data information of the Board of Directors can be seen in the Company Profile chapter of this Annual Report and Sustainability.

## Kebijakan Nominasi Dewan Komisaris dan Direksi [GRI 2-10]

### Kebijakan

Kebijakan Nominasi Dewan Komisaris dan Direksi mengacu pada Peraturan Otoritas Jasa Keuangan No. 34/POJK.04/2014 tentang Komite Nominasi dan Remunerasi Emiten atau Perusahaan Publik dan Anggaran Dasar Bank. Berdasarkan ketentuan tersebut, calon Dewan Komisaris dan Direksi yang dinominasikan harus memenuhi persyaratan yang telah ditentukan dalam Anggaran Dasar Bank dan peraturan perundang-undangan yang berlaku, dengan melakukan seleksi sesuai dengan yang dipersyaratkan oleh peraturan tersebut.

### Prosedur Nominasi

Adapun proses nominasi Dewan Komisaris dan Direksi dijelaskan sebagai berikut.

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

## Kebijakan Remunerasi Dewan Komisaris dan Direksi [GRI 2-19][GRI 2-20]

### Kebijakan

Kebijakan Remunerasi Dewan Komisaris dan Direksi mengacu pada Peraturan Otoritas Jasa Keuangan No. 45/POJK.03/2015 tentang Penerapan Tata Kelola dalam Pemberian Remunerasi bagi Bank Umum dan Surat Edaran Otoritas Jasa Keuangan No. 40/SEOJK.03/2016 tentang Penerapan Tata Kelola dalam Pemberian Remunerasi Bank Umum. Berdasarkan ketentuan tersebut, remunerasi yang diterima Dewan Komisaris dan Direksi, terdiri dari:

1. Remunerasi yang bersifat tetap, yaitu remunerasi yang tidak dikaitkan dengan kinerja dan risiko, seperti gaji pokok atau honorarium dan tunjangan hari raya; dan

## Nomination Policy of the Board of Commissioners and the Board of Directors [GRI 2-10]

### Policy

The Board of Commissioners and Board of Directors Nomination Policy refers to Financial Services Authority Regulation No. 34/POJK.04/2014 concerning the Nomination and Remuneration Committee of Issuers or Public Companies and the Bank's Articles of Association. Based on these provisions, candidates for the Board of Commissioners and Board of Directors who are nominated must meet the requirements stipulated in the Bank's Articles of Association and applicable laws and regulations by conducting a selection in accordance with the requirements of these regulations.

### Nomination Procedure

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

1. Nominated candidates can be submitted by fulfilling the applicable criteria and can come from internal and external sources.
2. Candidate nominations are completed with the administrative requirements set and processed through selection by the Remuneration and Nomination Committee.
3. The Remuneration and Nomination Committee can hold further meetings in order to identify the qualifications of the nominated candidates.
4. The Remuneration and Nomination Committee may involve other parties considered independent to be asked for opinions (if necessary), including conducting interviews with the independent parties, on the condition that decision-making remains carried out by the Remuneration and Nomination Committee.
5. Nomination of candidates recommended by the Remuneration and Nomination Committee are required to undergo a fit and proper test conducted by the authorized financial authority and the results of the decisions produced become recommendations for the GMS in order to ratify and/or determine the results of the decisions.

## Remuneration Policy for the Board of Commissioners and Board of Directors [GRI 2-19][GRI 2-20]

### Policy

The Remuneration Policy for the Board of Commissioners and Board of Directors refers to Financial Services Authority Regulation No. 45/POJK.03/2015 concerning the Implementation of Governance in the Provision of Remuneration for Commercial Banks and Financial Services Authority Circular Letter No. 40/SEOJK.03/2016 concerning the Implementation of Governance in the Provision of Remuneration for Commercial Banks. Based on these provisions, the remuneration received by the Board of Commissioners and Board of Directors consists of:

1. Fixed remuneration, namely remuneration that is not linked to performance and risk, such as basic salary or honorarium, honorarium and holiday allowance; and

2. Remunerasi yang bersifat variabel, yaitu Remunerasi yang dikaitkan dengan kinerja dan risiko, antara lain tantiem atau bentuk lainnya yang dipersamakan dengan itu.

2. Variable remuneration, namely remuneration that is linked to performance and risk, including tantiem or other forms that are equated with that.

**Prosedur Penetapan Remunerasi**

Penetapan remunerasi Dewan Komisaris dan Direksi dilakukan melalui serangkaian prosedur, mulai dari usulan Komite Remunerasi dan Nominasi sebelum akhirnya ditetapkan oleh Rapat Umum Pemegang Saham. Prosedur tersebut diungkapkan dalam bentuk skema berikut.

**Remuneration Determination Procedure**

The determination of the remuneration for the Board of Commissioners and Board of Directors is carried out through a series of procedures, starting from the proposal of the Remuneration and Nomination Committee before finally being determined by the General Meeting of Shareholders. The procedure is expressed in the following schematic form.

**KOMITE REMUNERASI DAN NOMINASI**
**REMUNERATION AND NOMINATION COMMITTEE**

Komite Remunerasi dan Nominasi mengumpulkan informasi mengenai standar remunerasi untuk jabatan dan industri sejenis dengan memperhitungkan kinerja Bank Sinarmas. Komite membuat rekomendasi kepada Dewan Komisaris.

Remuneration and Nomination Committee collects information about remuneration standards for similar positions and industries by considering Bank Sinarmas performance. The Committee gives recommendation to the Board of Commissioners.

**DEWAN KOMISARIS**
**BOARD OF COMMISSIONERS**

Dewan Komisaris mempelajari rekomendasi dari Komite Remunerasi dan Nominasi mengusulkan remunerasi Dewan Komisaris dan Direksi kepada RUPS.

The Board of Commissioners reviews the recommendation of the Remuneration and Nomination Committee, and proposes the remuneration of the Board of Commissioners and the Board of Directors to the GMS.

**RAPAT UMUM PEMEGANG SAHAM**
**GENERAL MEETING OF SHAREHOLDERS**

RUPS memberi wewenang kepada Dewan Komisaris untuk menetapkan gaji dan honorarium dengan memperhatikan usul yang diajukan oleh Komite Remunerasi dan Nominasi.

The GMS authorizes the Board of Commissioners to determine the honorarium by considering the proposal submitted by the Remuneration and Nomination Committee.

**REMUNERASI DEWAN KOMISARIS DAN DIREKSI**
**REMUNERATION OF THE BOARD OF COMMISSIONERS AND DIRECTORS**

Pelaksanaan remunerasi Dewan Komisaris dan Direksi telah sesuai dengan prosedur atas peraturan yang berlaku.

The implementation of the remuneration for the Board of Commissioners and the Board of Directors is provided in accordance with procedures for the applicable regulations.

**Indikator Remunerasi**

Remunerasi Dewan Komisaris dan Direksi ditetapkan dengan mempertimbangkan beberapa hal, baik peraturan perundang-undangan yang berlaku maupun kebijakan internal, seperti kinerja Bank. Selain itu, pemberian remunerasi didasarkan pada kinerja masing-masing anggota melalui pelaksanaan tugas dan tanggung jawab Dewan Komisaris dan Direksi. Sementara itu, indikator penentu besaran remunerasi Dewan Komisaris dan Direksi, yakni:

**Remuneration Indicators**

The remuneration of the Board of Commissioners and Board of Directors is determined by considering several things, both applicable laws and internal policies, such as the Bank's performance. In addition, the provision of remuneration is based on the performance of each member through the implementation of the duties and responsibilities of the Board of Commissioners and Board of Directors. Meanwhile, the indicators determining the amount of remuneration for the Board of Commissioners and Board of Directors are:

1. Skala Usaha;
2. Kompleksitas Usaha;
3. *Peer Group*;
4. Tingkat Inflasi;
5. Perkembangan industri perbankan;
6. Kondisi Kinerja Bank; dan
7. Kemampuan keuangan Bank.

**Penetapan *Material Risk Takers* (MRT)**

Bank Sinarmas menetapkan *material risk takers* (MRT) melalui 2 pendekatan, yaitu:

1. Metode kualitatif, yakni sesuai dengan porsi tanggung jawab yang berpengaruh terhadap profil risiko utama yang akan ditentukan berdasarkan evaluasi profil risiko Bank; serta
2. Metode kuantitatif, yakni melalui perbandingan penerimaan remunerasi yang bersifat variabel antara MRT dan non-MRT dengan tetap mempertimbangkan kinerja dan tingkat risiko jabatan.

Organ Bank yang ditetapkan menjadi bagian dari MRT adalah Pengurus Bank dan Pejabat Eksekutif setingkat Group Head yang terdiri dari 36 orang.

**Penangguhan atau Penarikan Kembali Remunerasi**

Bank Sinarmas memiliki kewenangan untuk menunda pembayaran remunerasi variabel yang ditangguhkan (malus) atau mengambil kembali remunerasi variabel yang telah dibayarkan (*clawback*) kepada pihak yang ditetapkan sebagai MRT, dengan syarat-syarat tertentu yang telah ditentukan, seperti:

1. Bank mengalami kerugian;
2. Terjadinya risiko yang berdampak negatif terhadap keuangan Bank;
3. Terjadinya *fraud*, pelanggaran hukum, perilaku tidak etis, dan/atau pemalsuan catatan oleh pihak yang menjadi MRT yang merugikan Bank; serta
4. Kondisi lainnya.

Persentase penangguhan pembayaran remunerasi ditetapkan berdasarkan stabilitas keuangan Bank, kecukupan dan penguatan permodalan Bank, kebutuhan likuiditas jangka pendek dan jangka panjang, serta potensi pendapatan di masa mendatang. Waktu penangguhan pembayaran remunerasi minimal adalah 3 tahun, namun dapat disesuaikan untuk periode yang lebih panjang sesuai dengan jangka waktu risiko yang relevan.

**Hubungan Remunerasi dan Kinerja Perusahaan**

Bank Sinarmas menetapkan penilaian kinerja dengan pendekatan *Key Performance Indicator* (KPI) yang mengacu pada Rencana Bisnis Bank (RBB). Selain itu, penilaian tersebut pun mempertimbangkan penerapan aspek risiko dan kepatuhan dalam pengelolaan Bank oleh Direksi. Hasil dari penilaian tersebut dijadikan bahan evaluasi dalam hal penentuan pemberian remunerasi bagi Direksi.

1. Business Scale;
2. Business Complexity;
3. Peer Group;
4. Inflation Rate;
5. Development of the banking industry;
6. Bank Performance Conditions; and
7. Bank's financial capability.

**Determination of Material Risk Takers (MRT)**

Bank Sinarmas determines material risk takers (MRT) through 2 approaches, namely:

1. Qualitative method, namely in accordance with the portion of responsibility that affects the main risk profile, which will be determined based on the evaluation of the Bank's risk profile; and
2. Quantitative method, namely through a comparison of variable remuneration receipts between MRT and non-MRT while still considering performance and job risk levels.

The Bank Organs that are designated as part of MRT are Bank Management and Executive Officers at the Group Head level consisting of 36 people.

**Remuneration Suspension or Clawback**

Bank Sinarmas has the authority to postpone the payment of deferred variable remuneration (malus) or take back the variable remuneration that has been paid (clawback) to the party designated as MRT, with certain conditions that have been determined, such as:

1. The Bank experiences a loss;
2. The occurrence of a risk that has a negative impact on the Bank's finances;
3. The occurrence of fraud, violation of the law, unethical behavior, and/or falsification of records by the party acting as MRT that is detrimental to the Bank; and
4. Other conditions.

The percentage of deferral of remuneration payments is determined based on the Bank's financial stability, the adequacy and strengthening of the Bank's capital, short-term and long-term liquidity needs, and potential future income. The minimum suspension period for remuneration payments is 3 years but can be adjusted for a longer period according to the relevant risk period.

**Relationship between Remuneration and Company Performance**

Bank Sinarmas determines performance assessments using the Key Performance Indicator (KPI) approach that refers to the Bank's Business Plan (RBB). In addition, the assessment also considers the implementation of risk and compliance aspects in the management of the Bank by the Board of Directors. The results of the assessment are used as evaluation material in determining the provision of remuneration for the Board of Directors.

## Komponen Remunerasi [GRI 2-21]

Komponen remunerasi yang diterima Dewan Komisaris dan Direksi diungkapkan sebagai berikut.

## Remuneration Components [GRI 2-21]

The remuneration components received by the Board of Commissioners and the Board of Directors are disclosed as follows.

### Realisasi Remunerasi Dewan Komisaris
**Realization of Board of Commissioners Remuneration**

| Jenis Remunerasi dan Fasilitas Lain<br>Types of Remuneration and Other Facilities | 2024 | | 2023 | | 2022 | |
|---|---|---|---|---|---|---|
| | **Jumlah Penerima**<br>Number of Beneficiaries | **Dalam Jutaan Rupiah**<br>In Million Rupiah | **Jumlah Penerima**<br>Number of Beneficiaries | **Dalam Jutaan Rupiah**<br>In Million Rupiah | **Jumlah Penerima**<br>Number of Beneficiaries | **Dalam Jutaan Rupiah**<br>In Million Rupiah |
| Remunerasi (honorarium, tantiem, tunjangan hari raya, dan lainnya)<br>Remuneration (honorarium, tantiem, holiday allowance, and others) | 3 | 5.999 | 3 | 5.802 | 3 | 5.099 |
| Fasilitas lain dalam bentuk alat komunikasi, kendaraan, asuransi jiwa, asuransi kesehatan, *executive club membership*, dan sebagainya..<br>Other facilities include communication devices, vehicles, life insurance, health insurance, executive club membership, and others. | | | | | | |
| a. Dapat dimiliki<br>Purchasable | - | - | - | - | 1 | 28 |
| b. Tidak dapat dimiliki<br>Non-Purchasable | - | - | - | - | - | - |
| **Jumlah**<br>**Total** | **3** | **5.999** | **3** | **5.802** | **3** | **5.127** |

### Realisasi Remunerasi Direksi
**Realization of Board of Directors' Remuneration**

| Jenis Remunerasi dan Fasilitas Lain<br>Types of Remuneration and Other Facilities | 2024 | | 2023 | | 2022 | |
|---|---|---|---|---|---|---|
| | **Jumlah Penerima**<br>Number of Beneficiaries | **Dalam Jutaan Rupiah**<br>In Million Rupiah | **Jumlah Penerima**<br>Number of Beneficiaries | **Dalam Jutaan Rupiah**<br>In Million Rupiah | **Jumlah Penerima**<br>Number of Beneficiaries | **Dalam Jutaan Rupiah**<br>In Million Rupiah |
| Remunerasi (gaji, tantiem, tunjangan hari raya, dan lainnya)<br>Remuneration (salary, tantiem, holiday allowance, and others.) | 6 | 28.604 | 9 | 29.824 | 7 | 21.091 |
| Fasilitas lain dalam bentuk alat komunikasi, kendaraan, asuransi jiwa, asuransi kesehatan, *executive club membership*, dan sebagainya.<br>Other facilities include communication devices, vehicles, life insurance, health insurance, executive club membership, and so on. | | | | | | |
| a. Dapat dimiliki<br>Purchasable | 3 | 82 | 3 | 84 | 1 | 28 |
| b. Tidak dapat dimiliki<br>Non-Purchasable | - | - | - | - | - | - |
| **Jumlah**<br>**Total** | **6** | **28.686** | **9** | **29.908** | **7** | **21.119** |

# PENGUNGKAPAN INFORMASI PERUBAHAN KEPEMILIKAN SAHAM DEWAN KOMISARIS DAN DIREKSI

## Disclosure of Information on Changes in Share Ownership of the Board of Commissioners and Board of Directors

Bank Sinarmas telah memiliki kebijakan mengenai kewajiban Dewan Komisaris dan Direksi untuk melakukan pengungkapan kepada Bank terkait kepemilikan saham dan setiap perubahan kepemilikan saham wajib diungkapkan dalam waktu 3 (tiga) hari kerja setelah transaksi. Ketentuan tersebut mengacu pada Peraturan OJK Nomor 11/POJK.04/2017 tentang Laporan Kepemilikan atau Setiap Perubahan Kepemilikan Saham Perusahaan Terbuka.

### Pelaksanaan Tahun 2024

Mengacu pada peraturan tersebut, Bank melaporkan bahwa sepanjang tahun 2024 tidak terjadi perubahan kepemilikan saham Dewan Komisaris dan Direksi di Bank Sinarmas. Dengan demikian, komposisinya adalah sebagai berikut:

Bank Sinarmas has a policy regarding the obligation of the Board of Commissioners and Board of Directors to make disclosures to the Bank regarding share ownership, and any changes in share ownership must be disclosed within 3 (three) working days after the transaction. This provision refers to OJK Regulation No. 11/POJK.04/2017 concerning Ownership Reports or Any Changes in Share Ownership of Public Companies.

### Implementation in 2024

Referring to this regulation, the Bank reports that throughout 2024 there were no changes in share ownership of the Board of Commissioners and Board of Directors in Bank Sinarmas. Therefore, the composition is as follows:

| Nama<br>Name | Jabatan<br>Position | 2024 | | 2023 | |
|---|---|---|---|---|---|
| | | **Jumlah Saham (Lembar Saham)**<br>Number of Shares (Share) | **Persentase Kepemilikan (%)**<br>Ownership Percentage (%) | **Jumlah Saham (Lembar Saham)**<br>Number of Shares (Share) | **Persentase Kepemilikan (%)**<br>Ownership Percentage (%) |
| **Dewan Komisaris**<br>**Board of Commissioners** | | | | | |
| Tjendrawati Widjaja | Komisaris Utama<br>President Commissioner | - | - | - | - |
| Sammy Kristamuljana | Komisaris Independen<br>Independent Commissioner | - | - | - | - |
| Rusmin | Komisaris Independen<br>Independent Commissioner | - | - | - | - |
| **Direksi**<br>**Board of Directors** | | | | | |
| Frenky Tirtowijoyo | Direktur Utama<br>President Director | - | - | - | - |
| Miko Andidjaja | Direktur<br>Director | - | - | - | - |
| Ekajaya Ongny Putra | Direktur<br>Director | - | - | - | - |
| Enny Kamal | Direktur<br>Director | 1.683.501 | 0,0085 | 1.795.332 | 0,0091 |
| Sendy | Direktur<br>Director | - | - | - | - |
| Amandalia Johanes | Direktur<br>Director | - | - | - | - |

# KOMITE-KOMITE DI BAWAH DEWAN KOMISARIS

## Committees Under the Board of Commissioners

### KOMITE AUDIT

Komite Audit merupakan organ pendukung Dewan Komisaris yang membantu di bidang pengawasan terhadap kualitas Laporan Keuangan, sistem pengendalian internal, dan Fungsi Audit Internal. Komite ini juga berperan dalam mengawasi implementasi tata kelola dan kepatuhan Bank terhadap peraturan perundang-undangan.

#### Pedoman Kerja

Komite Audit menjalankan tugas tanggung jawabnya dengan berpedoman pada Piagam Komite Audit Rev 3.0. Piagam tersebut telah disahkan pada 25 April 2019 yang memuat tentang:

1. Pembentukan;
2. Dasar Hukum;
3. Susunan dan Syarat Anggota;
4. Pengangkatan atau Pemberhentian;
5. Tugas dan Tanggung Jawab;
6. Wewenang;
7. Masa Tugas;
8. Kode Etik;
9. Tata Cara dan Prosedur Kerja;
10. Ketentuan Rapat;
11. Pelaporan; dan
12. Masa Berlaku Piagam Penanganan dan Pengaduan pada Pelaporan Keuangan.

#### Pengangkatan dan Pemberhentian

Anggota Komite Audit diangkat dan diberhentikan oleh Dewan Komisaris. Anggota Komite Audit dapat diberhentikan apabila yang bersangkutan berakhir masa jabatan keanggotaannya dan berdasarkan keputusan Dewan Komisaris, serta diberhentikan karena tidak memenuhi kinerja yang telah ditetapkan dan/atau tidak kompeten dalam menjalankan tugasnya.

### AUDIT COMMITTEE

The Audit Committee is a supporting organ of the Board of Commissioners that oversees the quality of financial reports, internal control systems, and performs internal auditing. The Committee also oversees the implementation of governance and the Bank's adherence to laws and regulations.

#### Work Guidelines

The Audit Committee carries out its duties and responsibilities based on the Audit Committee Charter Rev 3.0. The charter was ratified on April 25, 2019, which contains:

1. Formation;
2. Legal Basis;
3. Composition and Requirements of Member;
4. Appointment or Dismissal;
5. Duties and Responsibilities;
6. Authority;
7. Term of Service;
8. Code of Ethics;
9. Work Methods and Procedures;
10. Meeting Provisions;
11. Reporting; and
12. Validity Period of the Charter for Handling and Complaints in Financial Reporting.

#### Appointment and Dismissal

Members of the Audit Committee are appointed and dismissed by the Board of Commissioners. Dismissal can occur at the end of a member's term or at the discretion of the Board of Commissioners. Members may also be dismissed for failing to meet performance expectations and/or being deemed incompetent to carry out their responsibilities.

## Struktur dan Susunan Anggota Komite Audit

Anggota Komite Audit Bank Sinarmas, terdiri dari seorang Komisaris Independen dan 2 orang Pihak Independen yang memiliki keahlian di bidang keuangan atau akuntansi dan seorang dari Pihak Independen yang memiliki keahlian di bidang hukum atau perbankan. Susunan anggota Komite Audit Bank per 31 Desember 2024 diungkapkan sebagai berikut.

## Structure and Composition of the Audit Committee

The Audit Committee of Bank Sinarmas comprises an Independent Commissioner and three Independent Parties. Two of the Independent Parties possess expertise in finance or accounting, while the third has expertise in law or banking. The composition of the Audit Committee as of December 31, 2024, is presented as follows.

| Nama<br>Name | Jabatan<br>Position | Dasar Pengangkatan<br>Legal Basis of Appointment | Periode Masa Jabatan<br>Term of Office | Keahlian<br>Expertise |
|---|---|---|---|---|
| Sammy Kristamuljana | Ketua<br>Chairman | Surat Keputusan No.SK.070/2024/PRESDIR tentang Susunan Anggota Komite Audit PT. Bank Sinarmas Tbk., yang dikeluarkan pada 1 Oktober 2024.<br>Decree No.SK.070/2024/PRESDIR concerning the Composition of Members of the Audit Committee of PT. Bank Sinarmas Tbk., issued on October 1, 2024. | 2024 - 2026 | Ekonomi, Akuntansi, dan Manajemen<br>Economics, Accounting, and Management |
| Robert A Simanjuntak | Anggota (Pihak Independen)<br>Member (Independent Party) | | 2024 - 2026 | Ekonomi, Keuangan, dan Perbankan<br>Economics, Finance, and Banking |
| Reynold M Batubara | Anggota (Pihak Independen)<br>Member (Independent Party) | | 2024 - 2026 | Ekonomidan Keuangan<br>Economics and Finance |

## Profil Anggota Komite Audit

## Audit Committee Member Profile

### Sammy Kristamuljana

Ketua

Chairman

| | |
|---|---|
| Dasar Hukum Pengangkatan<br>Legal Basis for Appointment | Diangkat berdasarkan Surat Keputusan No.SK.070/2024/PRESDIR tentang Susunan Anggota Komite Audit PT. Bank Sinarmas Tbk., yang dikeluarkan pada 1 Oktober 2024.<br>Appointed based on Decree No.SK.070/2024/PRESDIR concerning the Composition of Members of the Audit Committee of PT. Bank Sinarmas Tbk., issued on October 1, 2024. |

Profil dapat dilihat pada bab Profil Perusahaan dalam Laporan Tahunan dan Keberlanjutan ini.
The profile can be found in this Annual and Sustainability Report, under the Company Profile chapter.



**Robert A Simanjuntak**
Anggota (Pihak Independen)
Member (Independent Party)

**Kewarganegaraan | Citizenship**
Indonesia

**Domisili | Domicile**
Jakarta

**Usia | Age**
62 tahun | years old

**Periode dan Dasar Hukum Pengangkatan**
**Term of Office and Legal Basis of Appointment**

Surat Keputusan No.SK.070/2024/PRESDIR tentang Susunan Anggota Komite Audit PT. Bank Sinarmas Tbk., yang dikeluarkan pada 1 Oktober 2024.
Decree No.SK.070/2024/PRESDIR concerning the Composition of Members of the Audit Committee of PT. Bank Sinarmas Tbk., issued on October 1, 2024.

**Riwayat Pendidikan | Educational Background**
- *Philosophy Doctor, Economics*, University of Birmingham, United Kingdom (1998).
- *Master of Science, Economics*, University of Birmingham, United Kingdom (1988); dan
- Sarjana Ekonomi, Universitas Indonesia, Jakarta (1986).
- Philosophy Doctor, Economics, University of Birmingham, United Kingdom (1998).
- Master of Science, Economics, University of Birmingham, United Kingdom (1988); and
- Bachelor of Economics, Universitas Indonesia, Jakarta (1986).

**Riwayat Pekerjaan | Work Experience**
- Komisaris PT Antam Tbk (2014-2019);
- Staf Khusus Menteri Keuangan Bidang Perumusan Kebijakan Fiskal Republik Indonesia (2014-2019);
- Komisaris PT Perkebunan Nusantara (PTPN) VII (2013-2014);
- Komisaris Independen PT Asuransi Tugu Pratama Indonesia Tbk (2010-2012);
- Ketua Tim Asistensi Menteri Keuangan Bidang Desentralisasi Fiskal (TADF) Republik Indonesia (2009-2014);
- Ketua Departemen Ilmu Ekonomi - Fakultas Ekonomi Universitas Indonesia (2005-2009);
- Tenaga Ahli Panitia Anggaran Dewan Perwakilan Rakyat Republik Indonesia (2003-2004);
- Direktur Program Magister Perencanaan dan Kebijakan Publik (MPKP) Fakultas Ekonomi Universitas Indonesia (1999-2005); dan
- Peneliti dan Konsultan Lembaga Penyelidikan Ekonomi dan Masyarakat (LPEM) Fakultas Ekonomi Universitas Indonesia (1986-2005)
- Commissioner of PT Antam Tbk (2014-2019);
- Special Staff of the Minister of Finance for the Formulation of Fiscal Policy of the Republic of Indonesia (2014-2019);
- Commissioner of PT Perkebunan Nusantara (PTPN) VII (2013-2014);
- Independent Commissioner of PT Asuransi Tugu Pratama Indonesia Tbk (2010-2012);
- Head of the Assistance Team for the Minister of Finance for Fiscal Decentralization (TADF) of the Republic of Indonesia (2009-2014);
- Head of the Department of Economics - Faculty of Economics, Universitas Indonesia (2005-2009);
- Expert Staff of the Budget Committee of the People's Representative Council of the Republic of Indonesia (2003-2004);
- Director of the Masters Program in Planning and Public Policy (MPKP) Faculty of Economics, Universitas Indonesia (1999-2005); and
- Researcher and Consultant of the Institute for Economic and Community Research (LPEM) Faculty of Economics, Universitas Indonesia (1986-2005)

**Rangkap Jabatan | Concurrent Position**
- Anggota Komite Pemantau Risiko PT. Bank Sinarmas Tbk. (sejak 2021);
- Anggota Komite Audit PT Sinar Mas Agro Resources and Technology Tbk (sejak 2020);
- Komisaris Independen dan Ketua Komite Audit PT Dian Swastatika Sentosa Tbk (sejak 2019);
- Wakil Ketua Dewan Pembina, Komite Pemantauan Pelaksanaan Otonomi Daerah (KPPOD) (sejak 2009);
- Guru Besar Ilmu Ekonomi Keuangan Negara, Fakultas Ekonomi, Universitas Indonesia (sejak 2008).
- Member of the Risk Monitoring Committee of PT. Bank Sinarmas Tbk. (since 2021);
- Member of the Audit Committee of PT Sinar Mas Agro Resources and Technology Tbk (since 2020);
- Independent Commissioner and Chairman of the Audit Committee of PT Dian Swastatika Sentosa Tbk (since 2019);
- Deputy Chairman of the Advisory Board, Regional Autonomy Implementation Monitoring Committee (KPPOD) (since 2009);
- Professor of State Financial Economics, Faculty of Economics, Universitas Indonesia (since 2008).

**Hubungan Afiliasi | Affiliated Relationship**
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.
Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders.



## Reynold M Batubara

Anggota (Pihak Independen)
Member (Independent Party)

**Kewarganegaraan | Citizenship**
Indonesia

**Domisili | Domicile**
Jakarta

**Usia | Age**
68 tahun | years old

**Periode dan Dasar Hukum Pengangkatan**
**Term of Office and Legal Basis of Appointment**

Surat Keputusan No.SK.070/2024/PRESDIR tentang Susunan Anggota Komite Audit PT. Bank Sinarmas Tbk., yang dikeluarkan pada 1 Oktober 2024.
Decree No.SK.070/2024/PRESDIR concerning the Composition of Members of the Audit Committee of PT. Bank Sinarmas Tbk., issued on October 1, 2024.

**Riwayat Pendidikan | Educational Background**
Sarjana Ekonomi bidang Akuntansi, Universitas Indonesia (1983).
Bachelor of Economics majoring in Accounting, Universitas Indonesia (1983).

**Riwayat Pekerjaan | Work Experience**
- Anggota Komite Audit dan Komite Manajemen Risiko PT Bank Net Indonesia Syariah (2020-2021);
- Anggota Komite Audit PT Chandra Astri Tbk (2015-2021);
- Anggota Komite Tata Kelola Perusahaan Terpadu (Integrated Corporate Governance) BNP Paribas (2016-2021);
- Komisaris PT Paramitra Multi Finance (2010-2011);
- Komisaris PT Smartfren Telecom Tbk (2009-2021);
- Anggota Komite Audit dan Komite Manajemen Risiko PT Maybank Syariah Indonesia (2008-2019);
- Konsultan New Frontier Solution (2008);
- Country Head Group Audit ABN AMRO Bank NV Indonesia (1994-2006);
- Head of Internal Audit Standard Chartered Bank (1993-1994);
- Audit Manager Ernst & Young International (1990-1993);
- Senior Auditor Moret, Ernst & Young Nederland, Amsterdam (1987-1990); dan
- Senior Auditor Arthur Young International (1980-1987).
- Member of the Audit Committee and Risk Management Committee of PT Bank Net Indonesia Syariah (2020-2021);
- Member of the Audit Committee of PT Chandra Astri Tbk (2015-2021);
- Member of the Integrated Corporate Governance Committee of BNP Paribas (2016-2021);
- Commissioner of PT Paramitra Multi Finance (2010-2011);
- Commissioner of PT Smartfren Telecom Tbk (2009-2021);
- Member of the Audit Committee and Risk Management Committee of PT Maybank Syariah Indonesia (2008-2019);
- New Frontier Solution Consultant (2008);
- Country Head Group Audit ABN AMRO Bank NV Indonesia (1994-2006);
- Head of Internal Audit Standard Chartered Bank (1993-1994);
- Audit Manager Ernst & Young International (1990-1993);
- Senior Auditor Moret, Ernst & Young Nederland, Amsterdam (1987-1990); and
- Senior Auditor Arthur Young International (1980-1987).

**Rangkap Jabatan | Concurrent Position**
- Anggota Komite Tata Kelola Terintegrasi PT. Bank Sinarmas Tbk. (sejak 2022);
- Anggota Komite Pemantau Risiko PT. Bank Sinarmas Tbk. (sejak 2021);
- Anggota Komite Audit PT Asuransi Etiqa Internasional (sejak 2019);
- Anggota Komite Pemantau Risiko PT Elnusa Tbk (sejak 2013);
- Anggota Komite Audit PT ATLAS Resources Tbk (sejak 2012); dan
- Komisaris PT Paramitra Alfa Sekuritas (sejak 2009).
- Member of the Integrated Governance Committee of PT. Bank Sinarmas Tbk. (since 2022);
- Member of the Risk Monitoring Committee of PT. Bank Sinarmas Tbk. (since 2021);
- Member of the Audit Committee of PT Asuransi Etiqa Internasional (since 2019);
- Member of the Risk Monitoring Committee of PT Elnusa Tbk (since 2013);
- Member of the Audit Committee of PT ATLAS Resources Tbk (since 2012); and
- Commissioner of PT Paramitra Alfa Sekuritas (since 2009).

**Sertifikasi Profesi | Professional Certification**
- Sertifikasi Audit Internal dari The Institute of Internal Auditor Indonesia (IIA); dan
- Sertifikasi Penilaian Mutu dari The Institute of Internal Auditor Indonesia (IIA).
- Internal Audit Certification from The Institute of Internal Auditor Indonesia (IIA); and
- Quality Assessment Certification from The Institute of Internal Auditor Indonesia (IIA).

**Hubungan Afiliasi | Affiliated Relationship**
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.
Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders.

## Independensi Komite Audit

Bank menjamin bahwa seluruh anggota Komite Audit bertindak secara independen dan tidak menerima/ melakukan intervensi dari/ kepada pihak lainnya. Komite Audit juga tidak memiliki kepentingan serta keterkaitan yang bersifat pribadi yang berpotensi menimbulkan benturan kepentingan (*conflict of interest*) dengan Bank. Hal tersebut tercermin melalui pernyataan independensi berikut.

## Independence of the Audit Committee

The Bank ensures that all members of the Audit Committee act independently and do not receive or engage in any form of intervention from or with other parties. The Audit Committee also holds no personal interests or affiliations that could potentially lead to a conflict of interest with the Bank. This commitment is reflected in the following statement of independence.

| Aspek Independensi<br>Independence Aspect | Sammy Kristamuljana | Robert A Simanjuntak | Reynold M Batubara |
|---|---|---|---|
| Tidak memiliki hubungan keuangan dengan Dewan Komisaris dan Direksi.<br>Has no financial relationship with the Board of Commissioners and Board of Directors. | √ | √ | √ |
| Tidak memiliki hubungan kepemilikan saham di Bank.<br>Has no share ownership relationship in the Bank. | √ | √ | √ |
| Tidak memiliki hubungan kepengurusan di Bank, Entitas Anak, serta perusahaan afiliasi.<br>Has no management relationship in the Bank, Subsidiaries, and affiliated companies. | √ | √ | √ |
| Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, dan/atau anggota Komite Audit.<br>Has no family relationship with the Board of Commissioners, Board of Directors, and/ or members of the Audit Committee. | √ | √ | √ |
| Tidak menjabat sebagai pengurus partai politik, pejabat, dan pemerintah.<br>Has not served as a political party administrator, official, and government. | √ | √ | √ |

## Tugas dan Tanggung Jawab Komite Audit

Tugas dan tanggung jawab Komite Audit Bank Sinarmas, yakni:

1. 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 Bank;
2. Melakukan penelaahan atas ketaatan terhadap peraturan perundang-undangan yang berhubungan dengan kegiatan Bank;
3. Memberikan pendapat independen dalam hal terjadi perbedaan pendapat antara manajemen dan akuntan atas jasa yang diberikannya;
4. Memberikan rekomendasi kepada Dewan Komisaris mengenai penunjukan akuntan publik yang didasarkan kepada independensi, ruang lingkup penugasan, dan fee;
5. Melakukan pemantauan dan evaluasi paling sedikit terhadap pelaksanaan tindak lanjut oleh Direksi atas hasil temuan Satuan Kerja Audit Internal (SKAI), akuntan publik, dan hasil pengawasan Otoritas Jasa Keuangan;
6. Melakukan evaluasi terhadap pelaksanaan pemberian jasa audit atas informasi keuangan historis tahunan oleh akuntan publik dan/atau kantor akuntan publik;
7. Melakukan penelaahan terhadap aktivitas pelaksanaan manajemen risiko yang dilakukan oleh Direksi, jika Bank tidak memiliki fungsi pemantau risiko di bawah Dewan Komisaris;
8. Komite Audit wajib melakukan pemantauan dan evaluasi atas perencanaan dan pelaksanaan audit serta pemantauan atas tindak lanjut hasil audit dalam rangka menilai kecukupan pengendalian internal, termasuk kecukupan proses pelaporan keuangan;

## Duties and Responsibilities of the Audit Committee

The duties and responsibilities of the Audit Committee of Bank Sinarmas are:

1. Reviewing financial information to be issued by the Bank to the public and/or authorities, including financial reports, projections, and other reports related to the Bank's financial information;
2. Reviewing compliance with laws and regulations related to the Bank's activities;
3. Providing an independent opinion in the event of a difference of opinion between management and accountants regarding the services provided;
4. Providing recommendations to the Board of Commissioners regarding the appointment of a public accountant based on independence, scope of assignment, and fee;
5. Monitoring and evaluating at least the implementation of follow-up actions by the Board of Directors regarding the findings of the Internal Audit Work Unit (SKAI), public accountants, and the results of supervision by the Financial Services Authority;
6. Evaluating the implementation of the provision of audit services for annual historical financial information by public accountants and/or public accounting firms;
7. Reviewing the implementation of risk management activities carried out by the Board of Directors, if the Bank does not have a risk monitoring function under the Board of Commissioners;
8. The Audit Committee is required to monitor and evaluate the planning and implementation of audits and to monitor the follow-up of audit results in order to assess the adequacy of internal control, including the adequacy of the financial reporting process;

9. Komite Audit wajib melakukan pemantauan dan evaluasi paling sedikit terhadap:
   a. Pelaksanaan tugas Satuan Kerja Audit Internal (SKAI);
   b. Kesesuaian pelaksanaan audit oleh kantor akuntan publik dengan standar audit;
   c. Kesesuaian Laporan Keuangan dengan standar akuntansi keuangan; dan
   d. Pelaksanaan tindak lanjut Direksi atas hasil temuan Satuan Kerja Audit Internal, akuntan publik, dan hasil pengawasan Otoritas Jasa Keuangan guna memberikan rekomendasi kepada Dewan komisaris.
10. Memberikan rekomendasi terkait pengangkatan dan pemberhentian Kepala SKAI;
11. Memberikan rekomendasi terkait Piagam Audit Internal;
12. Memantau dan mengkaji efektivitas pelaksanaan audit internal Bank;
13. Mengevaluasi kinerja SKAI;
14. Memastikan SKAI melakukan komunikasi dengan Direksi, Dewan Komisaris, Dewan Pengawas Syariah bagi bank umum syariah dan bank umum konvensional yang memiliki unit usaha syariah, auditor eksternal, dan Otoritas Jasa Keuangan;
15. Memastikan SKAI bekerja secara independen;
16. Memberikan rekomendasi kepada Dewan Komisaris terkait penyusunan rencana audit, ruang lingkup, dan anggaran SKAI;
17. Meninjau laporan audit dan memastikan Direksi mengambil tindakan perbaikan yang diperlukan secara cepat untuk mengatasi kelemahan pengendalian, fraud, masalah kepatuhan terhadap kebijakan, undang-undang dan peraturan atau masalah lain yang diidentifikasi dan dilaporkan oleh SKAI;
18. Memberikan rekomendasi kepada Dewan Komisaris terkait pemberian remunerasi tahunan SKAI secara keseluruhan serta penghargaan kinerja;
19. Memastikan SKAI menjunjung tinggi integritas dalam pelaksanaan tugas;
20. Memberikan rekomendasi terkait penunjukan pengendali mutu independen dari pihak eksternal dalam melakukan kaji ulang terhadap kinerja SKAI;
21. Melakukan penelaahan terhadap laporan pelaksanaan dan pokok-pokok hasil audit internal;
22. Menelaah laporan khusus mengenai setiap temuan audit internal yang diperkirakan dapat membahayakan kelangsungan usaha Bank;
23. Menelaah pengaduan yang berkaitan dengan proses akuntansi dan pelaporan keuangan Bank;
24. Menelaah dan memberikan saran kepada Dewan Komisaris terkait dengan adanya potensi benturan kepentingan Bank; dan
25. Menjaga kerahasiaan dokumen, data dan informasi Bank.

9. The Audit Committee is required to monitor and evaluate at least:
   a. Implementation of the duties of the Internal Audit Work Unit (SKAI);
   b. Compliance of the implementation of audits by the public accounting firm with audit standards;
   c. Compliance of the Financial Report with financial accounting standards; and
   d. Implementation of follow-up actions by the Board of Directors on the findings of the Internal Audit Work Unit, public accountants, and the results of supervision by the Financial Services Authority in order to provide recommendations to the Board of Commissioners.
10. Provide recommendations regarding the appointment and dismissal of the Head of SKAI;
11. Provide recommendations regarding the Internal Audit Charter;
12. Monitor and review the effectiveness of the implementation of the Bank's internal audit;
13. Evaluate the performance of SKAI;
14. Ensure that SKAI communicates with the Board of Directors, Board of Commissioners, Sharia Supervisory Board for Islamic commercial banks and conventional commercial banks that have Islamic business units, external auditors, and the Financial Services Authority;
15. Ensure that SKAI works independently;
16. Provide recommendations to the Board of Commissioners regarding the preparation of the SKAI audit plan, scope, and budget;
17. Review audit reports and ensure that the Board of Directors takes the necessary corrective actions promptly to address control weaknesses, fraud, compliance issues with policies, laws and regulations or other issues identified and reported by SKAI;
18. Provide recommendations to the Board of Commissioners regarding the provision of SKAI's overall annual remuneration and performance awards;
19. Ensure that SKAI upholds integrity in carrying out its duties;
20. Provide recommendations regarding the appointment of an independent quality controller from an external party in conducting a review of SKAI's performance;
21. Review the implementation report and the main points of the internal audit results;
22. Reviewing special reports on any internal audit findings that are estimated to endanger the Bank's business continuity;
23. Reviewing complaints related to the Bank's accounting and financial reporting processes;
24. Reviewing and providing advice to the Board of Commissioners regarding potential conflicts of interest within the Bank; and
25. Maintaining the confidentiality of the Bank's documents, data and information.

## Wewenang Komite Audit

Wewenang Komite Audit Bank, antara lain:

1. Mengakses dokumen, data, dan informasi Bank tentang karyawan, dana, aset, dan sumber daya perusahaan 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.

## Audit Committee Authority

The authority of the Bank's Audit Committee, among others:

1. Accessing the Bank's documents, data, and information on employees, funds, assets, and company resources as needed;
2. Communicating directly with employees, including the Board of Directors and parties carrying out the Internal Audit Function, risk management, and accountants regarding the duties and responsibilities of the Audit Committee;
3. Involving Independent Parties outside the Audit Committee members as needed to assist in carrying out its duties (if necessary); and
4. Carrying out other authorities granted by the Board of Commissioners.

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

Berkenaan dengan auditor eksternal, Komite Audit berperan memberikan rekomendasi kepada Dewan Komisaris dalam penunjukannya untuk disampaikan kepada RUPS. Ketika auditor eksternal tidak dapat menyelesaikan tugasnya, Komite Audit memberikan rekomendasi pengganti yang disampaikan kepada Dewan Komisaris.

## Audit Committee's Responsibility in Providing Recommendations for the Appointment and Dismissal of the External Auditor

With regard to the external auditor, the Audit Committee is responsible for providing recommendations to the Board of Commissioners for submission to the General Meeting of Shareholders (GMS). In the event the external auditor is unable to complete its duties, the Audit Committee shall recommend a replacement to the Board of Commissioners.

## Rapat Komite Audit

### Kebijakan

Kebijakan pelaksanaan Rapat Komite Audit merujuk pada Piagam Komite Audit serta POJK No. 17 Tahun 2023, yakni diselenggarakan dalam jangka waktu sekurangkurangnya 1 (satu) kali dalam 1 (satu) bulan. Rapat tersebut dihadiri oleh paling sedikit 51% dari jumlah anggota, termasuk seorang Komisaris Independen dan Pihak Independen. Apabila dipandang perlu, Komite Audit dapat mengundang unit kerja terkait dengan sepengetahuan Direktur yang membidangi.

### Frekuensi dan Kehadiran

Pada tahun 2024, Komite Audit telah menyelenggarakan rapat sebanyak 12 kali, dengan tingkat kehadiran sebagai berikut.

## Audit Committee Meetings

### Policy

The implementation policy of the Audit Committee Meeting refers to the Audit Committee Charter and POJK No. 17 of 2023, which is held within a period of at least 1 (one) time in 1 (one) month. The meeting is attended by at least 51% of the members, including an Independent Commissioner and Independent Party. If deemed necessary, the Audit Committee can invite related work units with the knowledge of the Director in charge.

### Frequency and Attendance

In 2024, the Audit Committee convened 12 meetings, with attendance rates as detailed below.

| Nama<br>Name | Jabatan<br>Position | Jumlah Rapat<br>Number of Meetings | Jumlah Kehadiran<br>Number of Attendance | Tingkat Kehadiran (%)<br>Attendance Rate (%) |
|---|---|---|---|---|
| Sammy Kristamuljana | Ketua<br>Chairman | 12 | 12 | 100 |
| Robert A Simanjuntak | Anggota (Pihak Independen)<br>Member (Independent Party) | 12 | 12 | 100 |
| Reynold M Batubara | Anggota (Pihak Independen)<br>Member (Independent Party) | 12 | 12 | 100 |

Informasi mengenai pelaksanaan Rapat Komite Audit, mulai dari tanggal, peserta, dan agenda diungkapkan pada tabel berikut.

Information regarding the implementation of the Audit Committee Meeting, starting from the date, participants and agenda is disclosed in the following table.

| Tanggal<br>Date | Peserta<br>Participant | Agenda |
|---|---|---|
| 29 Januari 2024<br>January 29, 2024 | - Sammy Kristamuljana<br>- Robert A Simanjuntak<br>- Reynold M Batubara | 1. Struktur Organisasi 2024<br>2. Annual Audit Plan 2024<br>3. Carry Over Audit – Q4 2023<br>4. Audit Result and Key Issues Q4 2023<br>5. Progress Tindak Lanjut Hasil Temuan SKAI (Overdue Findings)<br>6. Updates<br>1. Organizational Structure 2024<br>2. Annual Audit Plan 2024<br>3. Carry Over Audit – Q4 2023<br>4. Audit Result and Key Issues Q4 2023<br>5. Progress of Follow-up on SKAI Findings (Overdue Findings)<br>6. Updates |
| 27 Februari 2024<br>February 27, 2024 | - Sammy Kristamuljana<br>- Robert A Simanjuntak<br>- Reynold M Batubara | 1. Update per Februari 2024<br>2. Program Kerja Komite Audit Tahun 2024<br>1. Update as of February 2024<br>2. Audit Committee Work Program 2024 |
| 27 Maret 2024<br>March 27, 2024 | - Sammy Kristamuljana<br>- Robert A Simanjuntak<br>- Reynold M Batubara | 1. Hasil Audit Laporan Keuangan PT. Bank Sinarmas Tbk. periode 31 Desember 2023<br>1. Audit Results of PT. Bank Sinarmas Tbk. Financial Report for the period 31 December 2023 |
| 24 April 2024<br>April 24, 2024 | - Sammy Kristamuljana<br>- Robert A Simanjuntak<br>- Reynold M Batubara | 1. Audit Result and Key Issues Q1 2024<br>2. Overdue Findings<br>3. Updates<br>4. Key Updates |
| 28 Mei 2024<br>May 28, 2024 | - Sammy Kristamuljana<br>- Robert A Simanjuntak<br>- Reynold M Batubara | 1. Audit Progress, Result and Key Issues April 2024<br>2. Overdue Findings<br>1. Audit Progress, Results and Key Issues April 2024<br>2. Overdue Findings |
| 27 Juni 2024<br>June 27, 2024 | - Sammy Kristamuljana<br>- Robert A Simanjuntak<br>- Reynold M Batubara | 1. Audit Progress Mei 2024<br>2. Overdue Findings<br>1. Audit Progress May 2024<br>2. Overdue Findings |
| 26 Juli 2024<br>July 26, 2024 | - Sammy Kristamuljana<br>- Robert A Simanjuntak<br>- Reynold M Batubara | 1. Audit Progress Mei 2024<br>2. Audit Result Juni 2024<br>3. Updates<br>4. Overdue Findings<br>1. Audit Progress May 2024<br>2. Audit Results June 2024<br>3. Updates<br>4. Overdue Findings |
| 19 Agustus 2024<br>August 19, 2024 | - Sammy Kristamuljana<br>- Robert A Simanjuntak<br>- Reynold M Batubara | 1. IT Security dan Penerapan Data Governance di Bank Sinarmas<br>2. Progress Temuan Bank (Internal)<br>3. Progress Temuan Bank (Eksternal)<br>1. IT Security and Data Governance Implementation at Bank Sinarmas<br>2. Bank Findings Progress (Internal)<br>3. Bank Findings Progress (External) |
| 19 September 2024<br>September 19, 2024 | - Sammy Kristamuljana<br>- Robert A Simanjuntak<br>- Reynold M Batubara | 1. Progress Temuan Bank (Internal)<br>2. Laporan Penerapan Strategi Anti Fraud PT. Bank Sinarmas Tbk. Periode Triwulan II dan III Tahun 2024 (SAF)<br>3. Temuan Eksternal<br>1. Bank Findings Progress (Internal)<br>2. PT. Bank Sinarmas Tbk. Anti-Fraud Strategy Implementation Report for Quarter II and III of 2024 (SAF)<br>3. External Findings |
| 23 Oktober 2024<br>October 23, 2024 | - Sammy Kristamuljana<br>- Robert A Simanjuntak<br>- Reynold M Batubara | 1. Audit Progress per September 2024<br>2. Audit Result September 2024<br>3. Updates<br>4. Overdue Findings |
| 26 November 2024<br>November 26, 2024 | - Sammy Kristamuljana<br>- Robert A Simanjuntak<br>- Reynold M Batubara | 1. Progress Temuan Bank (Internal)<br>2. Progress Temuan Bank (Eksternal)<br>1. Bank Findings Progress (Internal)<br>2. Bank Findings Progress (External) |
| 5 Desember 2024<br>December 5, 2024 | - Sammy Kristamuljana<br>- Robert A Simanjuntak<br>- Reynold M Batubara | 1. Rencana Audit Laporan Keuangan PT. Bank Sinarmas Tbk. Tahun 2024<br>2. Annual Audit Plan 2025<br>1. Financial Report Audit Plan of PT. Bank Sinarmas Tbk. 2024<br>2. Annual Audit Plan 2025 |

## Laporan Pelaksanaan Tugas Komite Audit

Sepanjang tahun 2024, Komite Audit Bank Sinarmas telah melaksanakan tugas dan tanggung jawab sebagai berikut.

1. Melakukan pertemuan dengan akuntan publik (AP) guna pembahasan temuan-temuan AP dalam pelaksanaan audit tahun 2023.
2. Melakukan evaluasi terhadap kinerja kantor akuntan public (KAP) atas audit tahun 2023.
3. Memberi rekomendasi penunjukan KAP untuk audit tahun buku 2024.
4. Melakukan pertemuan dengan AP guna membahas sifat dan lingkup audit tahun 2024.
5. Melakukan evaluasi terhadap program kerja SKAI tahun 2024.
6. Mengadakan rapat-rapat membahas hasil pemeriksaan SKAI atas kantor-kantor cabang dan unit kerja sebagaimana program kerja SKAI tahun 2024.
7. Memberikan rekomendasi kepada manajemen untuk menindaklanjuti hasil temuan SKAI.
8. Melakukan *monitoring* tindaklanjut rekomendasi Komite Audit kepada manajemen terhadap hasil temuan SKAI.
9. Memberikan rekomendasi kepada SKAI terhadap cakupan rencana audit tahunan.
10. Memberi persetujuan atas Laporan Pelaksanaan dan Pokok-pokok Hasil Audit Internal setiap semester untuk disampaikan ke Otoritas Jasa Keuangan.
11. Melakukan evaluasi terhadap implementasi kebijakan akuntansi terbaru dan kegiatan korporasi yang akan dilaksanakan.
12. Melakukan evaluasi terhadap akuntabilitas dan transparansi laporan keuangan.

## Audit Committee's Report on the Execution of Duties

Throughout 2024, the Audit Committee of Bank Sinarmas carried out the following duties and responsibilities:

1. Held meetings with the Public Accountant (PA) to discuss findings from the 2023 audit.
2. Evaluated the performance of the Public Accounting Firm (PAF) for the 2023 audit.
3. Provided recommendations for the appointment of the PAF for the 2024 financial year audit.
4. Conducted meetings with the PA to discuss the nature and scope of the 2024 audit.
5. Evaluated the 2024 Internal Audit Unit (SKAI) work program.
6. Held meetings to review the audit findings of SKAI on branch offices and work units, as outlined in the 2024 SKAI work program.
7. Provided recommendations to management for the follow-up of SKAI audit findings.
8. Monitored the follow-up actions taken by management in response to the Audit Committee's recommendations on SKAI audit results.
9. Provided recommendations to SKAI regarding the scope of the annual audit plan.
10. Approved the Internal Audit Implementation Report and Key Audit Findings on a semi-annual basis for submission to the Financial Services Authority (OJK).
11. Evaluated the implementation of the latest accounting policies and upcoming corporate actions.
12. Assessed the accountability and transparency of financial reporting.

## Pengembangan Kompetensi Komite Audit

Bank Sinarmas memfasilitasi Komite Audit untuk mengikuti berbagai program pengembangan kompetensi. Langkah ini dilakukan untuk memastikan Komite Audit memiliki kompetensi yang diperlukan untuk menjalankan perannya secara efektif dalam mendukung kesuksesan dan keberlanjutan Bank.

Uraian pengembangan kompetensi anggota Komite Audit dari Dewan Komisaris telah disampaikan pada bagian "Realisasi Pelatihan" Dewan Komisaris yang terdapat pada Laporan Tahunan ini. Sedangkan realisasi pengembangan kompetensi dari pihak independen, seperti disampaikan melalui tabel di bawah ini:

## Audit Committee Competency Development

Bank Sinarmas facilitates various competency development programs for the Audit Committee. This initiative is aimed at ensuring that Audit Committee members possess the necessary expertise to effectively perform their roles in supporting the Bank's success and long-term sustainability.

Details of competency development for Audit Committee members from the Board of Commissioners are presented in the "Training Realization" section of the Board of Commissioners in this Annual Report. Meanwhile, the competency development realization for Independent Parties is presented in the table below.

| Nama<br>Name | Materi Pengembangan Kompetensi<br>Competency Development Materials | Tempat/Tanggal<br>Venue/Date | Penyelenggara<br>Organizer |
|---|---|---|---|
| Robert A Simanjuntak | Sosialisasi UU Nomor 27 Tahun 2022 tentang Pelindungan Data Pribadi<br>Socialization of Law Number 27 Year 2022 on Personal Data Protection | 19 Juni 2024<br>Juni 19, 2024 | Bank Sinarmas |

| Nama<br>Name | Materi Pengembangan Kompetensi<br>Competency Development Materials | Tempat/Tanggal<br>Venue/Date | Penyelenggara<br>Organizer |
|---|---|---|---|
| 1. Robert A Simanjuntak<br>2. Reynold M Batubara | Training PDPS For Excekutif | Ruang Maluku,<br>Roxy Square Lt.9<br>23 Juli 2024<br>Ruang Maluku,<br>Roxy Square Fl.9<br>July 23, 2024 | Karim Consulting Indonesia |
| Robert A Simanjuntak | Sinarmas Digital Day | 27 September 2024<br>September 27, 2024 | Sinarmas |
| Robert A Simanjuntak | LED-5: Audit Committee Essentials<br>LED-6: Board Risk Committee Essentials | 11 Oktober 2024<br>October 11, 2024 | Singapore Institute of Directors |
| 1. Robert A Simanjuntak<br>2. Reynold M Batubara | ACIIA Regional Conference Purposeful Impact | Bali Nusa Dua Convention Center 2, Bali, Indonesia<br>28 – 29 Agustus 2024<br>August 28 -29, 2024 | Asia Confederation of Institutes of Internal Auditors |
| Reynold M Batubara | Era Baru Audit Internal: Pengadopsian Global Internal Audit Standards (GIAS) dan Peran Artificial Intelligence (AI) dalam Audit Internal<br><br>The New Era of Internal Audit: The Adoption of Global Internal Audit Standards (GIAS) and the Role of Artificial Intelligence (AI) in Internal Auditing | PWC Indonesia Office<br>31 Oktober 2024<br>October 31, 2024 | Ikatan Auditor Intern Bank |



## KOMITE PEMANTAU RISIKO

Komite Pemantau Risiko merupakan organ yang dibentuk untuk memperkuat pengawasan terhadap potensi risiko yang dapat timbul dari kegiatan operasional Bank. Komite ini juga memiliki peran dalam menilai keselarasan antara kebijakan manajemen risiko dengan implementasinya.

### Pedoman Kerja

Komite Pemantau Risiko menjalankan tugas tanggung jawabnya dengan berpedoman pada Piagam Komite Pemantau Risiko Rev 3.0. Piagam tersebut telah disahkan pada 16 Mei 2019 yang memuat tentang:

1. Pembentukan dan Dasar Hukum;
2. Susunan dan Syarat Keanggotaan;
3. Pengangkatan dan Pemberhentian;
4. Tugas dan Tanggung Jawab;
5. Wewenang dan Masa Tugas;
6. Kode Etik;
7. Tata cara dan Prosedur Kerja;
8. Ketentuan Rapat;
9. Pelaporan; dan
10. Masa Berlaku.

### Pengangkatan dan Pemberhentian

Anggota Komite Pemantau Risiko diangkat oleh Direksi berdasarkan keputusan rapat Dewan Komisaris.

### Struktur dan Susunan Anggota Komite Pemantau Risiko

Anggota Komite Pemantau Risiko Bank Sinarmas, terdiri dari seorang Komisaris Independen sebagai Ketua, seorang Komisaris Utama sebagai anggota, serta 2 orang Pihak Independen yang memiliki keahlian di bidang keuangan dan manajemen risiko. Susunan anggota Komite Pemantau Risiko Bank per 31 Desember 2024 diungkapkan sebagai berikut.

## RISK MONITORING COMMITTEE

The Risk Monitoring Committee serves as a supervisory body established to enhance oversight of potential risks arising from the Bank's operational activities. It also plays a key role in evaluating the consistency between the Bank's risk management policies and their actual implementation.

### Work Guidelines

The Risk Monitoring Committee performs its duties and responsibilities in accordance with the Risk Monitoring Committee Charter Revision 3.0, which was ratified on May 16, 2019. The charter outlines the following provisions:

1. Formation and Legal Basis;
2. Membership Composition and Requirements;
3. Appointment and Dismissal;
4. Duties and Responsibilities;
5. Authority and Term of Office;
6. Code of Ethics;
7. Work Procedures and Procedures;
8. Meeting Provisions;
9. Reporting; and
10. Validity Period.

### Appointment and Dismissal

Members of the Risk Monitoring Committee are appointed by the Board of Directors based on the decision of the Board of Commissioners meeting.

### Structure and Composition of Members of the Risk Monitoring Committee

The Risk Monitoring Committee of Bank Sinarmas is composed of an Independent Commissioner serving as Chairman, the President Commissioner as a member, and two Independent Parties with expertise in finance and risk management. The composition of the Committee as of December 31, 2024, is presented as follows.

| Nama<br>Name | Jabatan<br>Position | Dasar Pengangkatan<br>Legal Basis of Appointment | Periode Masa Jabatan<br>Term of Office | Keahlian<br>Expertise |
|---|---|---|---|---|
| Rusmin | Ketua<br>Chairman | Surat Keputusan No. SK.071/2024/PRESDIR tentang Susunan Anggota Komite Pemantau Risiko PT Bank Sinarmas Tbk., yang dikeluarkan pada 1 Oktober 2024.<br>Decree No. SK.071/2024/PRESDIR concerning the Composition of Members of the Risk Monitoring Committee of PT. Bank Sinarmas Tbk., issued on October 1, 2024. | 2024-2026 | Perbankan dan Ekonomi.<br>Banking and Economics. |
| Tjendrawati Widijaja | Anggota<br>Member | | 2024-2026 | Ekonomi, Keuangan, dan Perbankan.<br>Economics, Finance, and Banking. |
| Reynold M Batubara | Anggota (Pihak Independen)<br>Member (Independent Party) | | 2024-2026 | Ekonomi dan Keuangan.<br>Economics and Finance. |
| Robert A Simanjuntak | Anggota (Pihak Independen)<br>Member (Independent Party) | | 2024-2026 | Ekonomi, Keuangan, dan Perbankan.<br>Economics, Finance, and Banking. |

## Profil Anggota Komite Pemantau Risiko

Profil anggota Komite Pemantau Risiko yang merupakan anggota Dewan Komisaris telah disampaikan dalam bab Profil Perusahaan yang terdapat dalam Laporan Tahunan dan Keberlanjutan ini. Anggota Komite Pemantau Risiko yang berasal dari Pihak Independen memiliki rangkap jabatan sebagai anggota Komite Audit dengan profil sudah disampaikan pada bagian Profil Anggota Komite Audit.

## Independensi Komite Pemantau Risiko

Bank menjamin bahwa seluruh anggota Komite Pemantau Risiko bertindak secara independen dan tidak menerima/melakukan intervensi dari/kepada pihak lainnya. Komite Pemantau Risiko juga tidak memiliki kepentingan serta keterkaitan yang bersifat pribadi yang berpotensi menimbulkan benturan kepentingan (*conflict of interest*) dengan Bank. Hal tersebut tercermin melalui pernyataan independensi berikut.

## Profile of Risk Monitoring Committee Members

The profiles of Risk Monitoring Committee members who are part of the Board of Commissioners are presented in the Company Profile section of this Annual and Sustainability Report. The Independent Parties serving on the Risk Monitoring Committee also hold concurrent positions as members of the Audit Committee, with their profiles disclosed in the Audit Committee Member Profiles section.

## Independence of the Risk Monitoring Committee

The Bank ensures that all members of the Risk Monitoring Committee act independently and do not receive or engage in any form of intervention from or with other parties. Furthermore, the Committee members have no personal interests or affiliations that could potentially lead to a conflict of interest with the Bank. This is affirmed through the following statement of independence.

| Aspek Independensi<br>Independence Aspect | Rusmin | Tjendrawati Widijaja | Reynold M Batubara | Robert A Simanjuntak |
|---|---|---|---|---|
| Tidak memiliki hubungan keuangan dengan Dewan Komisaris dan Direksi.<br>Has no financial relationship with the Board of Commissioners and Board of Directors. | √ | √ | √ | √ |
| Tidak memiliki hubungan kepemilikan saham di Bank.<br>Has no share ownership relationship in the Bank. | √ | √ | √ | √ |
| Tidak memiliki hubungan kepengurusan di Bank, Entitas Anak, serta perusahaan afiliasi.<br>Has no management relationship in the Bank, Subsidiaries, and affiliated companies. | √ | √ | √ | √ |
| Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, dan/atau anggota Komite Pemantau Risiko.<br>Has no family relationship with the Board of Commissioners, Board of Directors, and/or members of the Risk Monitoring Committee. | √ | √ | √ | √ |
| Tidak menjabat sebagai pengurus partai politik, pejabat, dan pemerintah.<br>Has no position as a political party administrator, official, and government. | √ | √ | √ | √ |

## Tugas dan Tanggung Jawab Komite Pemantau Risiko

Tugas dan tanggung jawab Komite Pemantau Risiko Bank Sinarmas, yakni:

1. Memberikan rekomendasi kepada Dewan Komisaris dalam rangka meningkatkan efektivitas Bank, terkait:
   a. Evaluasi tentang kesesuaian antara kebijakan manajemen risiko dengan pelaksanaan kebijakan Bank;
   b. Pemantauan dan evaluasi pelaksanaan tugas Komite Manajemen Risiko dan Satuan Kerja Manajemen Risiko (SKMR); dan
2. Memberikan rekomendasi kepada Dewan Komisaris atas kebijakan yang telah diambil oleh Manajemen berkaitan dengan manajemen risiko dan memastikan kebijakan manajemen risiko telah dilaksanakan dengan baik.

## Wewenang Komite Pemantau Risiko

Wewenang Komite Pemantau Risiko Bank, antara lain:

1. Memperoleh dokumen, data, dan informasi tentang Bank yang berkaitan dengan tugas dan tanggung jawab komite; dan
2. Melakukan koordinasi dengan *Risk Management Group* atau unit kerja lainnya apabila diperlukan.

## Rapat Komite Pemantau Risiko

### Kebijakan

Rapat Komite Pemantau Risiko diselenggarakan minimal 1 (satu) kali dalam satu bulan. Rapat tersebut dihadiri oleh paling sedikit 51% dari jumlah anggota, termasuk seorang Komisaris Independen dan seorang Pihak Independen.

### Realisasi

Pada tahun 2024, Komite Pemantau Risiko telah menyelenggarakan rapat sebanyak 12 kali, dengan tingkat kehadiran sebagai berikut.

## Duties and Responsibilities of the Risk Monitoring Committee

The duties and responsibilities of the Risk Monitoring Committee of Bank Sinarmas are as follows:

1. Provide recommendations to the Board of Commissioners to enhance the Bank's effectiveness, particularly regarding:
   a. Evaluation of the alignment between risk management policies and their implementation within the Bank;
   b. Monitoring and evaluation of the performance of the Risk Management Committee and the Risk Management Work Unit (SKMR); and
2. Provide recommendations to the Board of Commissioners on policies adopted by Management related to risk management and ensure that risk management policies are properly implemented.

## Authority of the Risk Monitoring Committee

The authorities of the Risk Monitoring Committee include:

1. Accessing documents, data, and information related to the Bank as necessary for the execution of its duties and responsibilities; and
2. Coordinating with the Risk Management Group or other relevant work units, as needed.

## Risk Monitoring Committee Meetings

### Policy

Risk Monitoring Committee meetings must be held at least 1 (one) time per month. Each meeting must be attended by no less than 51% of the total members, including one Independent Commissioner and one Independent Party.

### Realization

In 2024, the Risk Monitoring Committee held a total of 12 meetings, with attendance levels as detailed below.

| Nama<br>Name | Jabatan<br>Position | Jumlah Rapat<br>Number of Meetings | Jumlah Kehadiran<br>Number of Attendance | Tingkat Kehadiran (%)<br>Attendance Rate (%) |
|---|---|---|---|---|
| Rusmin | Ketua<br>Chairman | 12 | 12 | 100 |
| Tjendrawati Widijaja | Anggota<br>Member | 12 | 9 | 75 |
| Reynold M Batubara | Anggota (Pihak Independen)<br>Member (Independent Party) | 12 | 12 | 100 |
| Robert A Simanjuntak | Anggota (Pihak Independen)<br>Member (Independent Party) | 12 | 11 | 92 |

Informasi mengenai pelaksanaan Rapat Komite Pemantau Risiko, mulai dari tanggal, peserta, dan agenda diungkapkan pada tabel berikut.

Information regarding the implementation of the Risk Monitoring Committee Meeting, starting from the date, participants, and agenda is disclosed in the following table.

| Tanggal<br>Date | Peserta<br>Participant | Agenda |
|---|---|---|
| 19 Januari 2024<br>January 19, 2024 | - Rusmin<br>- Tjendrawati Widjaja<br>- Reynold M Batubara<br>- Robert A Simanjuntak | 1. Tindak Lanjut Rekomendasi Rapat Komite Manajemen Risiko Tanggal 24 November 2023 dan Komite Pemantau Risiko Tanggal 17 Oktober 2023<br>2. Proposal Laporan Tingkat Kesehatan Bank Semester II – Desember 2023 & Profil Risiko UUS Triwulan IV – Desember 2023<br>2.1 Laporan Tingkat Kesehatan Bank Semester II – Desember 2023<br>2.2 Laporan Profil Risiko Bank Semester II – Desember 2023<br>2.3 Laporan Profil Risiko UUS Triwulan IV – Desember 2023<br>2.4 Laporan Tata Kelola, Rentabilitas, Permodalan Semester II – Desember 2023<br>3. Laporan Stress Testing Bank dan UUS Semester II – Desember 2023<br>4. Laporan *Internal Capital Adequacy Assessment Process* (ICAAP) Semester II – Desember 2023<br>5. Pelampauan Risk Appetite & Risk Tolerance Triwulan IV – Desember 2023 (Oktober, November, Desember)<br>6. Pemantauan Realisasi Rasio Pembiayaan Inklusif Makroprudensial (RPIM) Posisi Desember 2023<br>7. Pemantauan dan Pelaporan Restrukturisasi Kredit Dampak Covid-19 Triwulan IV – Desember 2023<br>1. Follow-up to the Recommendations of the Risk Management Committee Meeting on November 24, 2023 and the Risk Monitoring Committee on October 17, 2023<br>2. Proposal for the Bank Health Level Report for Semester II – December 2023 & UUS Risk Profile for Quarter IV – December 2023<br>2.1 Bank Health Level Report for Semester II – December 2023<br>2.2 Bank Risk Profile Report for Semester II – December 2023<br>2.3 UUS Risk Profile Report for Quarter IV – December 2023<br>2.4 Governance, Rentability, Capital Report for Semester II – December 2023<br>3. Bank and UUS Stress Testing Report for Semester II – December 2023<br>4. Internal Capital Adequacy Assessment Process (ICAAP) Report for Semester II – December 2023<br>5. Exceeding Risk Appetite & Risk Tolerance for Quarter IV – December 2023 (October, November, December)<br>6. Monitoring Realization of Macroprudential Inclusive Financing Ratio (RPIM) Position December 2023<br>7. Monitoring and Reporting of Credit Restructuring Impact of Covid-19 Quarter IV – December 2023 |
| 29 Februari 2024<br>February 29, 2024 | - Rusmin<br>- Reynold M Batubara<br>- Robert A Simanjuntak | 1. Tindak Lanjut Rekomendasi Rapat Komite Manajemen Risiko Tanggal 17 Januari 2024 dan Komite Pemantau Risiko Tanggal 19 Januari 2024<br>2. Proposal Persetujuan *Risk Appetite & Risk Tolerance* PT. Bank Sinarmas Tbk. Konvensional Tahun 2024<br>2.1 Dasar penetapan *Risk Appetite & Risk Tolerance* Tahun 2024<br>2.2 *Risk Appetite & Risk Tolerance* Tahun 2024 per Jenis Risiko<br>3. Penerapan *Risk Control Self Assessment* (RCSA) *End to end Process* dengan Metode Penyempurnaan<br>4. Realisasi Rencana Kerja Komite Pemantau Risiko Tahun 2023 dan Proposal Program Kerja Komite Pemantau Risiko Tahun 2024<br>1. Follow-up to the Recommendations of the Risk Management Committee Meeting on January 17, 2024 and the Risk Monitoring Committee on January 19, 2024<br>2. Proposal for Approval of Risk Appetite & Risk Tolerance of PT. Bank Sinarmas Tbk. Conventional in 2024<br>2.1 Basis for Determining Risk Appetite & Risk Tolerance in 2024<br>2.2 Risk Appetite & Risk Tolerance in 2024 per Type of Risk<br>3. Implementation of Risk Control Self Assessment (RCSA) End to End Process with Improvement Method<br>4. Realization of the Risk Monitoring Committee Work Plan in 2023 and Proposal for the Risk Monitoring Committee Work Program in 2024 |
| 27 Maret 2024<br>March 27, 2024 | - Rusmin<br>- Tjendrawati Widjaja<br>- Reynold M Batubara<br>- Robert A Simanjuntak | 1. Konfirmasi Tindak Lanjut Rekomendasi Rapat Komite Manajemen Risiko Tanggal 28 Februari 2024 dan Rapat<br>2. Komite Pemantau Risiko Tanggal 29 Februari 2024<br>3. Proposal Persetujuan Hasil Kaji Ulang *Peers Bank* Tahun 2024 untuk Penyusunan Laporan Profil Risiko Bank Proposal Kaji Ulang Parameter, *Threshold*, dan Bobot Risiko Penilaian Tingkat Kesehatan Bank dan Profil Risiko (Bank dan Konsolidasi)<br>4. Proposal Kaji Ulang Parameter Rentabilitas dalam Laporan Tingkat Kesehatan Bank (Proposal Diajukan oleh Finance Group) Simulasi Perhitungan Laporan Tingkat Kesehatan Bank dan Laporan Profil Risiko Bank<br>5. (Konsolidasi & Konvensional) dengan Parameter, Rentang Risiko, dan Bobot Risiko Terbaru Menggunakan Data Posisi 31 Desember 2023.<br>1. Confirmation of Follow-up Recommendations of the Risk Management Committee Meeting on February 28, 2024 and the Meeting<br>2. Risk Monitoring Committee on February 29, 2024<br>3. Proposal for Approval of the Results of the 2024 Bank Peers Review for the Preparation of the Bank Risk Profile Report Proposal for Review of Parameters, Thresholds, and Risk Weights for Bank Health Level Assessment and Risk Profile (Bank and Consolidation)<br>4. Proposal for Review of Rentability Parameters in the Bank Health Level Report (Proposal Submitted by the Finance Group) Simulation of Calculation of the Bank Health Level Report and Bank Risk Profile Report<br>5. (Consolidation & Conventional) with the Latest Parameters, Risk Range, and Risk Weights Using Data Positioned on December 31, 2023. |

| Tanggal<br>Date | Peserta<br>Participant | Agenda |
|---|---|---|
| 25 April 2024<br>April 25, 2024 | - Rusmin<br>- Reynold M Batubara<br>- Robert A Simanjuntak | 1. Konfirmasi Tindak Lanjut Rekomendasi Rapat Komite Manajemen Risiko Tanggal 26 Maret 2024 dan Rapat Komite Pemantau Risiko Tanggal 27 Maret 2024<br>2. Proposal Persetujuan Bobot Risiko Penilaian Profil Risiko Bank (Konsolidasi) Tahun 2024<br>3. Proposal Laporan Profil Risiko Bank (Individu dan Konsolidasi) Triwulan I – 31 Maret 2024<br>3.1 Proposal Laporan Profil Risiko Bank (Individu) Triwulan I – 31 Maret 2024<br>3.2 Proposal Laporan Profil Risiko Bank (Konsolidasi) Triwulan I – 31 Maret 2024<br>4. Simulasi Peringkat Tingkat Kesehatan Bank Individu & Konsolidasi Posisi 31 Maret 2024 (Tata Kelola, Rentabilitas & Permodalan)<br>5. Proposal *Risk Appetite & Risk Tolerance* Maksimum Realisasi Kerugian Surat Berharga Tahun 2024 Pelampauan *Risk Appetite & Risk Tolerance* Triwulan I – 31 Maret 2024 (Januari, Februari, Maret)<br>6. Pelampauan *Risk Appetite & Risk Tolerance* Triwulan I – 31 Maret 2024 (Januari, Februari, Maret)<br>7. Pemantauan Realisasi Rasio Pembiayaan Inklusif Makroprudensial (RPIM) Posisi 2024.<br>1. Confirmation of Follow-up Recommendations of the Risk Management Committee Meeting on March 26, 2024 and the Risk Monitoring Committee Meeting on March 27, 2024<br>2. Proposal for Approval of Risk Weight for Bank Risk Profile Assessment (Consolidation) in 2024<br>3. Proposal for Bank Risk Profile Report (Individual and Consolidation) for Quarter I – March 31, 2024<br>3.1 Proposal for Bank Risk Profile Report (Individual) for Quarter I – March 31, 2024<br>3.2 Proposal for Bank Risk Profile Report (Consolidation) for Quarter I – March 31, 2024<br>4. Simulation of Individual & Consolidated Bank Health Rating Position on March 31, 2024 (Governance, Profitability & Capital)<br>5. Proposal for Risk Appetite & Risk Tolerance Maximum Realization of Securities Losses in 2024 Exceeding Risk Appetite & Risk Tolerance for Quarter I – March 31, 2024 (January, February, March)<br>6. Exceedance of Risk Appetite & Risk Tolerance Quarter I – March 31, 2024 (January, February, March)<br>7. Monitoring the Realization of the Macroprudential Inclusive Financing Ratio (RPIM) Position 2024. |
| 28 Mei 2024<br>May 28, 2024 | - Rusmin<br>- Tjendrawati Widjaja<br>- Reynold M Batubara<br>- Robert A Simanjuntak | 1. Laporan Penerapan Strategi Anti Fraud PT. Bank Sinarmas Tbk. Periode Triwulan IV 2023 dan I Tahun 2024<br>1. Report on the Implementation of Anti-Fraud Strategy of PT. Bank Sinarmas Tbk. Quarter IV 2023 and Quarter I 2024 |
| 27 Juni 2024<br>June 27, 2024 | - Rusmin<br>- Tjendrawati Widjaja<br>- Reynold M Batubara<br>- Robert A Simanjuntak | 1. Konfirmasi Tindak Lanjut Rekomendasi Rapat Komite Manajemen Risiko Tanggal 26 Maret 2024 dan 24 April 2024 serta Rapat Komite Pemantau Risiko Tanggal 25 April 2024<br>2. *Update* Pemenuhan Sertifikasi Manajemen Risiko (HCM)<br>3. Proposal Persetujuan atas Aspek Penilaian Manajemen Risiko TI (bagian dari *Digital Maturity Assessment Bank*) Posisi Desember 2023<br>1. Confirmation of Follow-up Recommendations of the Risk Management Committee Meetings on March 26, 2024 and April 24, 2024 and the Risk Monitoring Committee Meeting on April 25, 2024<br>2. Update on Fulfillment of Risk Management Certification (HCM)<br>3. Proposal for Approval of IT Risk Management Assessment Aspects (part of the Bank›s Digital Maturity Assessment) Position December 2023 |

| Tanggal<br>Date | Peserta<br>Participant | Agenda |
|---|---|---|
| 18 Juli 2024<br>July 18, 2024 | - Rusmin<br>- Tjendrawati Widjaja<br>- Reynold M Batubara<br>- Robert A Simanjuntak | 1. Konfirmasi tindak Lanjut Rekomendasi Rapat Komite Manajemen Risiko tanggal 26 Juni 2024 dan Rapat Komite Pemantau Risiko tanggal 27 Juni 2024<br>2. Proposal Persetujuan Rentang Risiko Profil Risiko Kredit (Individu & Konsolidasi)<br>3. Proposal Persetujuan Perhitungan Bobot Modal Laporan *Internal Capital Adequacy Assessment* Process (ICAAP) Konsolidasi<br>4. Proposal Laporan Tingkat Kesehatan Bank (Individu & Konsolidasi) Semester I – Juni 2024 & Profil Risiko Bank (Individu & Konsolidasi) Triwulan II - Juni 2024<br>4.1 Proposal Laporan Tingkat Kesehatan (Individu) Bank Semester I – Juni 2024<br>4.2 Proposal Laporan Profil Risiko Bank (Individu) Semester I – Juni 2024<br>4.3 Proposal Laporan Tata Kelola, Rentabilitas, Permodalan (Individu) Semester I – Juni 2024<br>4.4 Proposal Peringkat Laporan Profil Risiko Bank (Individu) Triwulan II – Juni 2024<br>4.5 Proposal Laporan Tingkat Kesehatan (Konsolidasi) Bank Semester I – Juni 2024<br>4.6 Proposal Laporan Profil Risiko Bank (Konsolidasi) Semester I – Juni 2024<br>4.7 Proposal Laporan Tata Kelola, Rentabilitas, Permodalan (Konsolidasi) Semester I – Juni 2024<br>4.8 Proposal Peringkat Laporan Profil Risiko Bank (Konsolidasi) Triwulan II – Juni 2024<br>5. Proposal Laporan *Stress Testing* Bank (Individu & Konsolidasi) Semester I – Juni 2024<br>6. Proposal Laporan *Internal Capital Adequacy Assessment Process* (ICAAP) (Individu & Konsolidasi) Semester I – Juni 2024<br>7. Pelampauan *Risk Appetite & Risk Tolerance* Triwulan II – Juni 2024 (April , Mei, Juni)<br>8. Pemantauan Realisasi Rasio Pembiayaan Inklusif Makroprudensial (RPIM) Posisi Juni 2024<br>1. Confirmation of Follow-up Recommendations of the Risk Management Committee Meeting on June 26, 2024 and the Risk Monitoring Committee Meeting on June 27, 2024<br>2. Proposal for Approval of Risk Range of Credit Risk Profile (Individual & Consolidated)<br>3. Proposal for Approval of Calculation of Capital Weight of Internal Capital Adequacy Assessment Process (ICAAP) Consolidated Report<br>4. Proposal for Report on Bank Health Level (Individual & Consolidated) Semester I – June 2024 & Bank Risk Profile (Individual & Consolidated) Quarter II - June 2024<br>4.1 Proposal for Bank Health Level Report (Individual) Semester I – June 2024<br>4.2 Proposal for Bank Risk Profile Report (Individual) Semester I – June 2024<br>4.3 Proposal for Governance, Rentability, Capital Report (Individual) Semester I – June 2024<br>4.4 Proposal for Bank Risk Profile Report Rating (Individual) Quarter II – June 2024<br>4.5 Proposal for Bank Health Level Report (Consolidation) Semester I – June 2024<br>4.6 Proposal for Bank Risk Profile Report (Consolidation) Semester I – June 2024<br>4.7 Proposal for Governance, Rentability, Capital Report (Consolidation) Semester I – June 2024<br>4.8 Proposal for Bank Risk Profile Report Rating (Consolidation) Quarter II – June 2024<br>5. Proposal for Bank Stress Testing Report (Individual & Consolidation) Semester I – June 2024<br>6. Proposal for Internal Capital Adequacy Assessment Process (ICAAP) Report (Individual & Consolidated) Semester I – June 2024<br>7. Exceedance of Risk Appetite & Risk Tolerance Quarter II – June 2024 (April, May, June)<br>8. Monitoring of Realization of Macroprudential Inclusive Financing Ratio (RPIM) Position June 2024 |
| 19 Agustus 2024<br>August 19, 2024 | - Rusmin<br>- Tjendrawati Widjaja<br>- Reynold M Batubara<br>- Robert A Simanjuntak | 1. Penanganan Restrukturisasi Kredit Bermasalah<br>1. Handling of Non Performing Credit Restructuring |
| 30 September 2024<br>September 30, 2024 | - Rusmin<br>- Tjendrawati Widjaja<br>- Reynold M Batubara | 1. Tindak Lanjut Rekomendasi Rapat Komite Manajemen Risiko tanggal 17 Juli 2024 dan Rapat Komite Pemantau Risiko tanggal 18 Juli 2024<br>2. Proposal Persetujuan Kaji Ulang *Risk Appetite & Risk Tolerance* Bank Tahun 2024<br>3. Tindak Lanjut permintaan Komite Pemantauan Risiko mengenai Evaluasi Risiko terkait Transaksi di Treasury (Risiko Pasar, Likuiditas & Operasional)<br>• Kebijakan, Prosedur, dan Penetapan Limit Risiko<br>• Identifikasi, Pengukuran dan Pemantauan Risiko<br>• Management Information System<br>1. Follow-up to the Recommendations of the Risk Management Committee Meeting on July 17, 2024 and the Risk Monitoring Committee Meeting on July 18, 2024<br>2. Proposal for Approval of the Bank's Risk Appetite & Risk Tolerance Review in 2024<br>3. Follow-up to the Risk Monitoring Committee's request regarding the Evaluation of Risks related to Transactions in Treasury (Market, Liquidity & Operational Risks)<br>• Risk Limit Policies, Procedures, and Determination<br>• Risk Identification, Measurement and Monitoring<br>• Management Information System |

| Tanggal<br>Date | Peserta<br>Participant | Agenda |
|---|---|---|
| 17 Oktober 2024<br>October 17, 2024 | - Rusmin<br>- Reynold M Batubara<br>- Robert A Simanjuntak | 1. Tindak Lanjut Rekomendasi Rapat Komite Manajemen Risiko tanggal 24 September 2024 dan Rapat Komite Pemantau Risiko tanggal 30 September 2024<br>2. Proposal Laporan Profil Risiko Bank (Individu & Konsolidasi) Triwulan III - September 2024<br>• Proposal Laporan Profil Risiko Bank (Individu) Triwulan III – September 2024<br>• Proposal Laporan Profil Risiko Bank (Konsolidasi) Triwulan III – September 2024<br>• Proposal Simulasi Peringkat Tingkat Kesehatan (Individu & Konsolidasi) Bank Triwulan III – September 2024<br>• Proposal Simulasi Peringkat Tata Kelola, Rentabilitas, Permodalan (Individu & Konsolidasi) Triwulan III – September 2024<br>3. Pelampauan *Risk Appetite & Risk Tolerance* Triwulan III – September 2024 (Juli, Agustus, September)<br>4. Pemantauan Realisasi Rasio Pembiayaan Inklusif Makroprudensial (RPIM) Posisi September 2024<br>1. Follow-up to the Recommendations of the Risk Management Committee Meeting on September 24, 2024 and the Risk Monitoring Committee Meeting on September 30, 2024<br>2. Proposal for the Bank's Risk Profile Report (Individual & Consolidated) for Quarter III - September 2024<br>• Proposal for the Bank's Risk Profile Report (Individual) for Quarter III – September 2024<br>• Proposal for the Bank's Risk Profile Report (Consolidated) for Quarter III – September 2024<br>• Proposal for Bank Health Rating Simulation (Individual & Consolidated) Quarter III – September 2024<br>• Proposal for Governance, Rentability, Capital Rating Simulation (Individual & Consolidated) Quarter III – September 2024<br>3. Exceeding Risk Appetite & Risk Tolerance Quarter III – September 2024 (July, August, September)<br>4. Monitoring the Realization of the Macroprudential Inclusive Financing Ratio (RPIM) Position September 2024 |
| 26 November 2024<br>November 26, 2024 | - Rusmin<br>- Tjendrawati Widjaja<br>- Reynold M Batubara<br>- Robert A Simanjuntak | 1. Tindak Lanjut Rekomendasi Rapat Komite Manajemen Risiko tanggal 16 Oktober 2024 dan Rapat Komite Pemantau Risiko tanggal 17 Oktober 2024<br>2. Kaji Ulang Metodologi Perhitungan ICAAP<br>3. Realisasi Rencana Kerja Komite Manajemen Risiko Tahun 2024 dan Proposal Program Kerja Komite Manajemen Risiko Tahun 2025<br>• Realisasi Rencana Kerja Komite Pemantau Risiko Tahun 2024<br>• Proposal Program Kerja Komite Pemantau Risiko Tahun 2025<br>1. Follow-up to the Recommendations of the Risk Management Committee Meeting on October 16, 2024 and the Risk Monitoring Committee Meeting on October 17, 2024<br>2. Review of the ICAAP Calculation Methodology<br>3. Realization of the Risk Management Committee Work Plan for 2024 and the Risk Management Committee Work Program Proposal for 2025<br>• Realization of the Risk Monitoring Committee Work Plan for 2024<br>• Proposal of the Risk Monitoring Committee Work Program for 2025 |
| 11 Desember 2024<br>December 11, 2024 | - Rusmin<br>- Tjendrawati Widjaja<br>- Reynold M Batubara<br>- Robert A Simanjuntak | 1. Tindak Lanjut Rekomendasi Rapat Komite Manajemen Risiko tanggal 25 November 2024 dan Rapat Komite Pemantau Risiko tanggal 26 November 2024<br>2. Rencana Aksi Pemulihan Bank Sinarmas (*Recovery Plan*) Tahun 2024<br>3. Kinerja Keuangan Bank Sinarmas periode November 2024<br>1. Follow-up to the Recommendations of the Risk Management Committee Meeting on November 25, 2024 and the Risk Monitoring Committee Meeting on November 26, 2024<br>2. Bank Sinarmas Recovery Action Plan (Recovery Plan) for 2024<br>3. Bank Sinarmas Financial Performance for the period November 2024 |

## Laporan Pelaksanaan Tugas Komite Pemantau Risiko

Sepanjang tahun 2024, Komite Pemantau Risiko Bank Sinarmas telah melaksanakan tugas dan tanggung jawab sebagai berikut.

1. Memberikan rekomendasi kepada Dewan Komisaris dalam rangka meningkatkan efektivitas kinerja Bank, terkait:
   a. Evaluasi tentang kesesuaian antara kebijakan manajemen risiko dengan pelaksanaan kebijakan Bank;
   b. Pemantauan dan evaluasi pelaksanaan tugas Komite Manajemen Risiko dan Satuan Kerja Manajemen Risiko (SKMR); dan
2. Memberikan rekomendasi kepada Dewan Komisaris atas kebijakan yang telah diambil oleh Manajemen berkaitan dengan manajemen risiko dan memastikan kebijakan manajemen risiko telah dilaksanakan dengan baik.

## Report on the Implementation of Risk Monitoring Committee Duties

Throughout 2024, the Risk Monitoring Committee of Bank Sinarmas has carried out the following duties and responsibilities.

1. Providing recommendations to the Board of Commissioners in order to improve the effectiveness of the Bank's performance, related to:
   a. Evaluation of the conformity between risk management policies and the implementation of Bank policies;
   b. Monitoring and evaluation of the implementation of the duties of the Risk Management Committee and the Risk Management Work Unit (SKMR); and
2. Providing recommendations to the Board of Commissioners on policies that have been taken by Management related to risk management and ensuring that risk management policies have been implemented properly.

### Pengembangan Kompetensi Komite Pemantau Risiko

Bank Sinarmas memfasilitasi Komite Pemantau Risiko untuk mengikuti berbagai program pengembangan kompetensi. Langkah ini dilakukan untuk memastikan Komite Pemantau Risiko memiliki kompetensi yang diperlukan untuk menjalankan perannya secara efektif dalam mendukung kesuksesan dan keberlanjutan Bank.

Uraian pengembangan kompetensi anggota Komite Pemantau Risiko dari Dewan Komisaris telah disampaikan pada bagian "Realisasi Pelatihan" Dewan Komisaris yang terdapat pada Laporan Tahunan ini. Sedangkan realisasi pengembangan kompetensi untuk anggota Komite Pemantau Risiko yang berasal dari Pihak Independen telah disampaikan pada uraian Pengembangan Kompetensi Komite Audit.

## KOMITE REMUNERASI DAN NOMINASI

Komite Remunerasi dan Nominasi dibentuk untuk membantu Dewan Komisaris menjalankan fungsi remunerasi dan nominasi sesuai dengan ketentuan dan prinsip-prinsip GCG. Komite ini juga menjalankan fungsi remunerasi dan nominasi bagi anggota Dewan Komisaris, Direksi, anggota organ pendukung Dewan Komisaris, serta kerangka remunerasi dan nominasi bagi Pejabat Eksekutif Bank.

### Pedoman Kerja

Komite Remunerasi dan Nominasi menjalankan tugas tanggung jawabnya dengan berpedoman pada Piagam Komite Remunerasi dan Nominasi Rev 3.0. Piagam tersebut telah disahkan pada 25 April 2019 yang memuat tentang:

1. Pembentukan dan Susunan Keanggotaan;
2. Ketentuan;
3. Pengangkatan dan Pemberhentian;
4. Tugas dan Tanggung Jawab;
5. Kewenangan;
6. Masa Tugas;
7. Kode Etik;
8. Kewajiban;
9. Tata Cara dan Prosedur Kerja;
10. Ketentuan Rapat; dan
11. Masa Berlaku.

### Pengangkatan dan Pemberhentian

Anggota komite remunerasi dan nominasi diangkat dan diberhentikan berdasarkan keputusan rapat Dewan Komisaris untuk masa jabatan tertentu.

### Struktur dan Susunan Anggota Komite Remunerasi dan Nominasi

Anggota Komite Remunerasi dan Nominasi Bank Sinarmas, terdiri dari seorang Komisaris Independen sebagai Ketua,

### Risk Monitoring Committee Competency Development

Bank Sinarmas supports the participation of the Risk Monitoring Committee in various competency development programs. This initiative ensures that the committee possesses the necessary expertise to effectively perform its role in contributing to the Bank's success and long-term sustainability.

The competency development of the Risk Monitoring Committee members from the Board of Commissioners is detailed in the "Training Realization" section of the Board of Commissioners in this Annual Report. Meanwhile, the competency development of the Independent Party members of the Risk Monitoring Committee is outlined in the "Audit Committee Competency Development" section.

## REMUNERATION AND NOMINATION COMMITTEE

The Remuneration and Nomination Committee was formed to assist the Board of Commissioners in carrying out the remuneration and nomination functions in accordance with the provisions and principles of GCG. This committee also carries out the remuneration and nomination functions for members of the Board of Commissioners, Board of Directors, members of the Board of Commissioners' supporting organs, as well as the remuneration and nomination framework for Bank Executive Officers.

### Work Guidelines

The Remuneration and Nomination Committee carries out its duties and responsibilities by referring to the Remuneration and Nomination Committee Charter Rev 3.0. The charter was ratified on April 25, 2019, which contains:

1. Formation and Composition of Membership;
2. Provisions;
3. Appointment and Dismissal;
4. Duties and Responsibilities;
5. Authority;
6. Term of Office;
7. Code of Ethics;
8. Obligations;
9. Work Procedures and Procedures;
10. Meeting Provisions; and
11. Term of Validity.

### Appointment and Dismissal

Members of the Remuneration and Nomination Committee are appointed and dismissed based on resolutions made during meetings of the Board of Commissioners, for a specified term of office.

### Structure and Composition of Members of the Remuneration and Nomination Committee

The Remuneration and Nomination Committee of Bank Sinarmas consists of an Independent Commissioner serving

serta seorang Komisaris Utama dan pihak yang menduduki jabatan manajerial di bawah Direksi yang membidangi sumber daya manusia (SDM) sebagai anggota. Susunan anggota Komite Remunerasi dan Nominasi Bank per 31 Desember 2024 diungkapkan sebagai berikut.

as Chairman, along with the President Commissioner and a managerial-level individual overseeing human resources (HR) as members. The composition of the Bank's Remuneration and Nomination Committee as of December 31, 2024, is disclosed as follows.

| Nama<br>Name | Jabatan<br>Position | Dasar Pengangkatan<br>Legal Basis of Appointment | Periode Masa Jabatan<br>Term of Office | Keahlian<br>Expertise |
|---|---|---|---|---|
| Rusmin | Ketua<br>Chairman | Surat Keputusan No. SK.071/2024/PRESDIR tentang Susunan Anggota Komite Pemantau Risiko PT Bank Sinarmas Tbk., yang dikeluarkan pada 1 Oktober 2024.<br>Decree No. SK.071/2024/PRESDIR concerning the Composition of Members of the Risk Monitoring Committee of PT. Bank Sinarmas Tbk., issued on October 1, 2024. | 2024-2026 | Perbankan dan Ekonomi.<br>Economics and Finance. |
| Tjendrawati Widijaja | Anggota<br>Member | | 2024-2026 | Ekonomi, Keuangan, dan Perbankan.<br>Economics, Finance and Banking. |
| Christina Suryadinata | Anggota<br>Member | | 2024-2026 | Manajemen SDM.<br>HR Management. |



## Profil Anggota Komite Remunerasi dan Nominasi

Profil anggota Komite Remunerasi dan Nominasi yang merupakan anggota Dewan Komisaris telah disampaikan dalam bab Profil Perusahaan yang terdapat dalam Laporan Tahunan dan Keberlanjutan ini.

## Profile of Remuneration and Nomination Committee Members

The profile of the members of the Remuneration and Nomination Committee who are members of the Board of Commissioners has been presented in the Company Profile chapter contained in this Annual and Sustainability Report.



### Christina Suryadinata

Anggota
Member

**Kewarganegaraan | Citizenship**
Indonesia

**Domisili | Domicile**
Jakarta

**Usia | Age**
47 tahun | years old

**Periode dan Dasar Hukum Pengangkatan**
**Term of Office and Legal Basis of Appointment**

Surat Keputusan No. SK.071/2024/PRESDIR tentang Susunan Anggota Komite Pemantau Risiko PT Bank Sinarmas Tbk., yang dikeluarkan pada 1 Oktober 2024.
Decree No. SK.071/2024/PRESDIR on the Composition of Members of the Risk Monitoring Committee of PT Bank Sinarmas Tbk. issued on October 1, 2024.

**Riwayat Pendidikan | Educational Background**
Sarjana Ekonomi Universitas Parahyangan, Bandung (1999).
Bachelor of Economics, Universitas Parahyangan, Bandung (1999).

**Riwayat Pekerjaan | Work Experience**
- Head of Network & Consumer Lending Business Finance PT Bank Permata Tbk (2013-2016); dan
- Head of PFS Strategic Business Planning PT Bank UOB Indonesia (2008-2013).
- Head of Network & Consumer Lending Business Finance PT Bank Permata Tbk (2013-2016); and
- Head of PFS Strategic Business Planning PT Bank UOB Indonesia (2008-2013).

**Rangkap Jabatan | Concurrent Position**
Tidak merangkap jabatan, baik pada bank, perusahaan, dan/atau lembaga lain.
Does not hold concurrent positions, either at banks, companies, and/or other institutions.

**Sertifikasi Profesi | Professional Certification**
- Uji Kompetensi Manajemen Risiko (UKMR) Jenjang 5 atau Level 2 untuk skema lama;
- Refreshment Uji Kompetensi Manajemen Risiko (UKMR) 5 atau Level 2 untuk skema lama; dan
- Sertifikasi Manajemen Sumber Daya Manusia (MSDM) Level Manager.
- Risk Management Competency Test (UKMR) Level 5 or Level 2 for the old scheme;
- Refreshment Risk Management Competency Test (UKMR) 5 or Level 2 for the old scheme; and
- Human Resource Management (MSDM) Certification at Manager Level.

**Hubungan Afiliasi | Affiliated Relationship**
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.
Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders.

## Independensi Komite Remunerasi dan Nominasi

Bank menjamin bahwa seluruh anggota Komite Remunerasi dan Nominasi bertindak secara independen dan tidak menerima/melakukan intervensi dari/kepada pihak lainnya. Komite Remunerasi dan Nominasi juga tidak memiliki kepentingan serta keterkaitan yang bersifat pribadi yang berpotensi menimbulkan benturan kepentingan (*conflict of interest*) dengan Bank. Hal tersebut tercermin melalui pernyataan independensi berikut.

## Independence of the Remuneration and Nomination Committee

The Bank guarantees that all members of the Remuneration and Nomination Committee act independently and do not accept/conduct intervention from/to other parties. The Remuneration and Nomination Committee also does not have any personal interests or relationships that could potentially cause a conflict of interest with the Bank. This is reflected in the following independence statement.

| Aspek Independensi<br>Independence Aspect | Rusmin | Tjendrawati Widijaja | Christina Suryadinata |
|---|---|---|---|
| Tidak memiliki hubungan keuangan dengan Dewan Komisaris dan Direksi.<br>Has no financial relationship with the Board of Commissioners and Board of Directors. | √ | √ | √ |
| Tidak memiliki hubungan kepemilikan saham di Bank.<br>Has no share ownership relationship in the Bank. | √ | √ | √ |
| Tidak memiliki hubungan kepengurusan di Bank, Entitas Anak, serta perusahaan afiliasi.<br>Has no management relationship in the Bank, Subsidiaries, and affiliated companies. | √ | √ | √ |
| Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, dan/atau anggota Komite Audit.<br>Has no family relationship with the Board of Commissioners, Board of Directors, and/or members of the Audit Committee. | √ | √ | √ |
| Tidak menjabat sebagai pengurus partai politik, pejabat, dan pemerintah.<br>Has not served as a political party administrator, official, and government. | √ | √ | √ |

## Tugas dan Tanggung Jawab Komite Remunerasi dan Nominasi

Tugas dan tanggung jawab Komite Remunerasi dan Nominasi Bank Sinarmas, yakni:

Terkait dengan Fungsi Remunerasi:

1. Melakukan evaluasi terhadap kebijakan remunerasi yang didasarkan atas kinerja, risiko, kewajaran dengan peer group, sasaran dan strategi jangka panjang Bank, pemenuhan cadangan sebagaimana diatur dalam peraturan perundang-undangan dan potensi pendapatan Bank pada masa yang akan datang;
2. Menyampaikan hasil evaluasi dan rekomendasi kepada Dewan Komisaris mengenai:
   a. Kebijakan remunerasi bagi Direksi dan Dewan Komisaris untuk disampaikan kepada RUPS;
   b. Kebijakan remunerasi bagi pegawai secara keseluruhan untuk disampaikan kepada Direksi;
3. Memastikan bahwa kebijakan remunerasi telah sesuai dengan ketentuan yang berlaku;
4. Melakukan evaluasi secara berkala terhadap penerapan kebijakan remunerasi; dan
5. Dalam menetapkan kebijakan remunerasi yang bersifat variabel, komite remunerasi wajib berkoordinasi dengan *Risk Management Group*.

Terkait dengan Fungsi Nominasi:

1. Menyusun dan memberikan rekomendasi mengenai sistem serta prosedur pemilihan dan/atau penggantian anggota Direksi dan anggota Dewan Komisaris kepada Dewan Komisaris untuk disampaikan kepada RUPS;

## Duties and Responsibilities of the Remuneration and Nomination Committee

The duties and responsibilities of the Remuneration and Nomination Committee of Bank Sinarmas, namely:

Related to the Remuneration Function:

1. Conducting evaluations of remuneration policies based on performance, risk, fairness with peer groups, the Bank's long-term targets and strategies, fulfillment of reserves as stipulated in laws and regulations and the Bank's potential income in the future;
2. Submitting evaluation results and recommendations to the Board of Commissioners regarding:
   a. Remuneration policies for the Board of Directors and Board of Commissioners to be submitted to the GMS;
   b. Remuneration policies for employees as a whole to be submitted to the Board of Directors;
3. Ensuring that the remuneration policy is in accordance with applicable provisions;
4. Conducting periodic evaluations of the implementation of remuneration policies; and
5. In determining variable remuneration policies, the remuneration committee must coordinate with the Risk Management Group.

Related to the Nomination Function:

1. Prepare and provide recommendations regarding the system and procedures for the selection and/or replacement of members of the Board of Directors and members of the Board of Commissioners to the Board of Commissioners to be submitted to the GMS;

2. Memberikan rekomendasi mengenai calon anggota Direksi dan/atau calon anggota Dewan Komisaris kepada Dewan Komisaris untuk disampaikan kepada RUPS;

3. Memberikan rekomendasi mengenai Pihak Independen yang akan menjadi anggota komite audit serta anggota komite pemantau risiko kepada Dewan Komisaris;

4. Membantu Dewan Komisaris melakukan penilaian kinerja anggota Direksi dan/atau anggota Dewan Komisaris berdasarkan tolak ukur yang telah disusun sebagai bahan evaluasi;

5. Memberikan rekomendasi kepada Dewan Komisaris mengenai program pengembangan kemampuan anggota Direksi dan/atau Dewan Komisaris;

6. Memberikan rekomendasi kepada Dewan Komisaris mengenai:
   a. Komposisi jabatan anggota Direksi dan/atau anggota Dewan Komisaris;
   b. Kebijakan dan kriteria yang dibutuhkan dalam proses Nominasi; dan
   c. Kebijakan evaluasi kinerja bagi anggota Direksi dan/atau anggota Dewan Komisaris.

Anggota Komite Remunerasi dan Nominasi yang memiliki benturan kepentingan (*conflict of interest*) dengan usulan yang direkomendasikan, diwajibkan mengungkapkan hal tersebut dalam rekomendasinya.

## Wewenang Komite Remunerasi dan Nominasi

Wewenang Komite Remunerasi dan Nominasi Bank, antara lain:

1. Memperoleh dokumen, data, dan informasi tentang Perseroan yang diperlukan;
2. Melakukan koordinasi dengan Human Capital Management atau unit kerja lainnya apabila diperlukan; dan
3. Melakukan kewenangan lain yang diberikan Dewan Komisaris terkait remunerasi dan nominasi.

## Rapat Komite Remunerasi dan Nominasi

### Kebijakan

Sesuai ketentuan Peraturan Otoritas Jasa Keuangan No. 17 tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum, Komite Remunerasi dan Nominasi wajib menyelenggarakan rapat paling sedikit 1 (satu) kali dalam 3 (tiga) bulan.

### Realisasi

Pada tahun 2024, Komite Remunerasi dan Nominasi telah menyelenggarakan rapat sebanyak 4 (empat) kali, dengan tingkat kehadiran sebagai berikut.

2. Provide recommendations regarding candidates for members of the Board of Directors and/or candidates for members of the Board of Commissioners to the Board of Commissioners to be submitted to the GMS;
3. Provide recommendations regarding Independent Parties who will become members of the audit committee and members of the risk monitoring committee to the Board of Commissioners;
4. Assist the Board of Commissioners in assessing the performance of members of the Board of Directors and/or members of the Board of Commissioners based on benchmarks that have been prepared as evaluation materials;
5. Provide recommendations to the Board of Commissioners regarding the program for developing the capabilities of members of the Board of Directors and/or members of the Board of Commissioners;
6. Provide recommendations to the Board of Commissioners regarding:
   a. Composition of positions for members of the Board of Directors and/or members of the Board of Commissioners;
   b. Policies and criteria required in the Nomination process; and
   c. Performance evaluation policies for members of the Board of Directors and/or members of the Board of Commissioners.

Members of the Remuneration and Nomination Committee who have a conflict of interest with the recommended proposal are required to disclose this in their recommendations.

## Remuneration and Nomination Committee Authority

The authority of the Bank's Remuneration and Nomination Committee, among others:

1. Obtaining the necessary documents, data, and information about the Company;
2. Coordinating with Human Capital Management or other work units if necessary; and
3. Carrying out other authorities granted by the Board of Commissioners related to remuneration and nomination.

## Remuneration and Nomination Committee Meeting

### Policy

In accordance with the Financial Services Authority Regulation No. 17 of 2023 on the Implementation of Governance for Commercial Banks, the Remuneration and Nomination Committee is required to hold at least one meeting every three months.

### Realization

In 2024, the Remuneration and Nomination Committee held 4 (four) meetings, with the following attendance levels.

| Nama<br>Name | Jabatan<br>Position | Jumlah Rapat<br>Number of Meetings | Jumlah Kehadiran<br>Number of Attendance | Tingkat Kehadiran (%)<br>Attendance Rate (%) |
|---|---|---|---|---|
| Rusmin | Ketua<br>Chairman | 4 | 4 | 100 |
| Tjendrawati Widijaja | Anggota<br>Member | 4 | 4 | 100 |
| Christina Suryadinata | Anggota<br>Member | 4 | 4 | 100 |

Informasi mengenai pelaksanaan Rapat Komite Remunerasi dan Nominasi, mulai dari tanggal, peserta, dan agenda diungkapkan pada tabel berikut.

Information regarding the implementation of the Remuneration and Nomination Committee Meeting, starting from the date, participants, and agenda is disclosed in the following table.

| Tanggal<br>Date | Peserta<br>Participant | Agenda |
|---|---|---|
| 30 Januari 2024<br>January 30, 2024 | - Rusmin<br>- Tjendrawati Widjaja<br>- Christina Suryadinata | 1. Tunjangan Rangkap Jabatan<br>2. Upah Minimum Provinsi Tahun 2024<br>3. Penyesuaian Gaji Untuk Promosi<br>4. *Blacklist*<br>5. Struktur Organisasi BSIM<br>6. Hadiah Akhir Tahun<br>7. Informasi Pejabat Eksekutif<br>8. Program Kerja Komite Remunerasi dan Nominasi Tahun 2024<br>1. Dual Position Allowance<br>2. Provincial Minimum Wage in 2024<br>3. Salary Adjustment for Promotion<br>4. Blacklist<br>5. BSIM Organizational Structure<br>6. Year-End Prize<br>7. Executive Officer Information<br>8. Remuneration and Nomination Committee Work Program in 2024 |
| 22 April 2024<br>April 22, 2024 | - Rusmin<br>- Tjendrawati Widjaja<br>- Christina Suryadinata | 1. Kalibrasi Penilaian Kerja BSIM 2023<br>2. Realisasi KPI BOD BSIM 2023<br>3. Skema Kenaikan Gaji dan Jasa Produksi<br>4. Material *Risk Taker* BSIM 2024<br>5. Pejabat Eksekutif – *Movement*<br>1. BSIM Work Assessment Calibration 2023<br>2. BSIM BOD KPI Realization 2023<br>3. Salary Increase Scheme and Production Services<br>4. BSIM Material Risk Taker 2024<br>5. Executive Officer – Movement |
| 23 Juli 2024<br>July 23, 2024 | - Rusmin<br>- Tjendrawati Widjaja<br>- Christina Suryadinata | 1. Pencapaian *Quarterly* BSIM Q2 tahun 2024<br>2. Penilaian Tengah Tahun (PTT) tahun 2024<br>3. *Outsourcing* KPNO<br>4. MPP Monitoring 2024<br>5. *Promotion Scheme*<br>6. Pergerakan Pejabat *Executive*<br>1. Quarterly BSIM Achievement Q2 2024<br>2. Mid-Year Assessment (PTT) 2024<br>3. KPNO Outsourcing<br>4. MPP Monitoring 2024<br>5. Promotion Scheme<br>6. Executive Officer Movement |
| 22 Oktober 2024<br>October 22, 2024 | - Rusmin<br>- Tjendrawati Widjaja<br>- Christina Suryadinata | 1. Pencapaian *Quarterly* BSIM Q3 tahun 2024<br>2. Persyaratan Penilaian Kinerja untuk Promosi<br>3. Tunjangan Daerah Khusus<br>4. Tunjangan *Teller*<br>5. Remunerasi Amandalia Johannes<br>6. Pergerakan Pejabat Eksekutif.<br>1. Quarterly BSIM Achievement Q3 2024<br>2. Performance Assessment Requirements for Promotion<br>3. Special Regional Allowance<br>4. Teller Allowance<br>5. Amandalia Johannes Remuneration<br>6. Executive Officer Movement. |

## Laporan Pelaksanaan Tugas Komite Remunerasi dan Nominasi

Sepanjang tahun 2024, Komite Remunerasi dan Nominasi Bank Sinarmas telah melaksanakan tugas dan tanggung jawab sebagai berikut.

Terkait dengan Fungsi Remunerasi:

1. Melakukan evaluasi terhadap kebijakan remunerasi yang didasarkan atas kinerja, risiko, kewajaran dengan *peer group*, sasaran dan strategi jangka panjang Bank, pemenuhan cadangan sebagaimana diatur dalam peraturan perundang-undangan dan potensi pendapatan Bank pada masa yang akan datang;
2. Menyampaikan hasil evaluasi dan rekomendasi kepada Dewan Komisaris mengenai:
   a. Kebijakan remunerasi bagi Direksi dan Dewan Komisaris untuk disampaikan kepada RUPS;
   b. Kebijakan remunerasi bagi pegawai secara keseluruhan untuk disampaikan kepada Direksi;
3. Memastikan bahwa kebijakan remunerasi telah sesuai dengan ketentuan yang berlaku;
4. Melakukan evaluasi secara berkala terhadap penerapan kebijakan remunerasi; dan
5. Dalam menetapkan kebijakan remunerasi yang bersifat variabel, komite remunerasi wajib berkoordinasi dengan *Risk Management Group*.

Terkait dengan Fungsi Nominasi:

1. Menyusun dan memberikan rekomendasi mengenai sistem serta prosedur pemilihan dan/atau penggantian anggota Direksi dan anggota Dewan Komisaris kepada Dewan Komisaris untuk disampaikan kepada RUPS;
2. Memberikan rekomendasi mengenai calon anggota Direksi dan/atau calon anggota Dewan Komisaris kepada Dewan Komisaris untuk disampaikan kepada RUPS;
3. Memberikan rekomendasi mengenai Pihak Independen yang akan menjadi anggota komite audit serta anggota komite pemantau risiko kepada Dewan Komisaris;
4. Membantu Dewan Komisaris melakukan penilaian kinerja anggota Direksi dan/atau anggota Dewan Komisaris berdasarkan tolak ukur yang telah disusun sebagai bahan evaluasi;
5. Memberikan rekomendasi kepada Dewan Komisaris mengenai program pengembangan kemampuan anggota Direksi dan/atau Dewan Komisaris;
6. Memberikan rekomendasi kepada Dewan Komisaris mengenai:
   a. Komposisi jabatan anggota Direksi dan/atau anggota Dewan Komisaris;
   b. Kebijakan dan kriteria yang dibutuhkan dalam proses Nominasi; dan

## Report on the Implementation of the Remuneration and Nomination Committee's Duties

Throughout 2024, the Remuneration and Nomination Committee of Bank Sinarmas has carried out the following duties and responsibilities.

Related to the Remuneration Function:

1. Evaluating the remuneration policy based on performance, risk, fairness with peer groups, the Bank's long-term targets and strategies, fulfillment of reserves as stipulated in laws and regulations and the Bank's potential income in the future;
2. Submitting the results of the evaluation and recommendations to the Board of Commissioners regarding:
   a. Remuneration policy for the Board of Directors and Board of Commissioners to be submitted to the GMS;
   b. Remuneration policy for employees as a whole to be submitted to the Board of Directors;
3. Ensuring that the remuneration policy is in accordance with applicable provisions;
4. Conducting periodic evaluations of the implementation of the remuneration policy; and
5. In determining the variable remuneration policy, the remuneration committee is required to coordinate with the Risk Management Group.

Related to the Nomination Function:

1. Prepare and provide recommendations regarding the system and procedures for the selection and/or replacement of members of the Board of Directors and members of the Board of Commissioners to the Board of Commissioners to be submitted to the GMS;
2. Provide recommendations regarding candidates for members of the Board of Directors and/or candidates for members of the Board of Commissioners to the Board of Commissioners to be submitted to the GMS;
3. Provide recommendations regarding Independent Parties who will become members of the audit committee and members of the risk monitoring committee to the Board of Commissioners;
4. Assist the Board of Commissioners in assessing the performance of members of the Board of Directors and/or members of the Board of Commissioners based on benchmarks that have been prepared as evaluation materials;
5. Provide recommendations to the Board of Commissioners regarding the program for developing the capabilities of members of the Board of Directors and/or Board of Commissioners;
6. Provide recommendations to the Board of Commissioners regarding:
   a. Composition of positions for members of the Board of Directors and/or members of the Board of Commissioners;
   b. Policies and criteria required in the Nomination process; and

c. Kebijakan evaluasi kinerja bagi anggota Direksi dan/atau anggota Dewan Komisaris.

c. Performance evaluation policies for members of the Board of Directors and/or members of the Board of Commissioners.

### Pengembangan Kompetensi Komite Remunerasi dan Nominasi

Bank Sinarmas memfasilitasi Komite Remunerasi dan Nominasi untuk mengikuti berbagai program pengembangan kompetensi. Langkah ini dilakukan untuk memastikan Komite Remunerasi dan Nominasi memiliki kompetensi yang diperlukan untuk menjalankan perannya secara efektif dalam mendukung kesuksesan dan keberlanjutan Bank.

Informasi pengembangan kompetensi Komite Remunerasi dan Nominasi telah disampaikan pada bagian "Realisasi Pelatihan" Dewan Komisaris yang terdapat pada Laporan Tahunan ini.

### Competency Development of the Remuneration and Nomination Committee

Bank Sinarmas supports the Remuneration and Nomination Committee in participating in various competency development programs. This initiative aims to ensure that the Committee possesses the necessary skills and expertise to perform its duties effectively in contributing to the Bank's success and long-term sustainability.

Details regarding the competency development of the Remuneration and Nomination Committee are provided in the "Training Realization" section of the Board of Commissioners in this Annual Report.

## KOMITE TATA KELOLA TERINTEGRASI

Komite Tata Kelola Terintegrasi Bank Sinarmas dibentuk untuk membantu pelaksanaan tugas dan tanggung jawab Dewan Komisaris Entitas Utama dalam melakukan pengawasan atas penerapan tata kelola terintegrasi. Bank Sinarmas merupakan Entitas Utama dari Konglomerasi Keuangan Sinar Mas.

### Pedoman Kerja

Komite Tata Kelola Terintegrasi menjalankan tugas tanggung jawabnya dengan berpedoman pada Pedoman Tata Kelola Terintegrasi yang disahkah pada 6 Desember 2024.

### Struktur dan Susunan Anggota Komite Tata Kelola Terintegrasi

Susunan Keanggotaan Komite Tata Kelola Terintegrasi tertuang dalam Memorandum No. 032/2024/DIRUT-EU tanggal 6 Desember 2024 tentang Susunan Keanggotaan Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas.

## INTEGRATED GOVERNANCE COMMITTEE

The Integrated Governance Committee of Bank Sinarmas was established to support the Board of Commissioners of the Main Entity in carrying out its duties and responsibilities in overseeing the implementation of integrated governance. Bank Sinarmas serves as the Main Entity of the Sinar Mas Financial Conglomerate.

### Work Guidelines

The Integrated Governance Committee carries out its duties and responsibilities based on the Integrated Governance Guidelines, which were ratified on December 6, 2024.

### Structure and Composition of Members of the Integrated Governance Committee

The Composition of Membership of the Integrated Governance Committee is stated in Memorandum No. 032/2024/DIRUT-EU dated December 6, 2024 concerning the Composition of Membership of the Integrated Governance Committee of the Sinar Mas Financial Conglomerate.

| Nama<br>Name | LJK | Jabatan<br>Position |
|---|---|---|
| Sammy Kristamuljana | Komisaris Independen PT. Bank Sinarmas Tbk. (Entitas Utama)<br>Independent Commissioner of PT. Bank Sinarmas Tbk. (Main Entity) | Ketua merangkap Anggota Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas<br>Chairman and Member of the Integrated Governance Committee of Sinar Mas Financial Conglomerate |
| Tonny Latidjan | Komisaris Independen PT Asuransi Sinar Mas<br>Independent Commissioner of PT Asuransi Sinar Mas | Anggota Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas<br>Member of the Integrated Governance Committee of Sinar Mas Financial Conglomerate |
| J. Chandra Setiawan Puspito | Komisaris Independen PT Asuransi Simas Insurtech<br>Independent Commissioner of PT Asuransi Simas Insurtech | Anggota Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas<br>Member of the Integrated Governance Committee of Sinar Mas Financial Conglomerate |
| Aditiawan Chandra | Komisaris Independen PT Asuransi Simas Jiwa<br>Independent Commissioner of PT Asuransi Simas Jiwa | Anggota Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas<br>Member of the Integrated Governance Committee of Sinar Mas Financial Conglomerate |

| Nama<br>Name | LJK | Jabatan<br>Position |
|---|---|---|
| Rohana Sumihar | Komisaris Independen PT Asuransi Summit Otto<br>Independent Commissioner of PT Asuransi Summit Otto | Anggota Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas<br>Member of the Integrated Governance Committee of Sinar Mas Financial Conglomerate |
| Mohammad Shaifie Zein | Komisaris Independen PT Reasuransi Nusantara Makmur<br>Independent Commissioner of PT Reasuransi Nusantara Makmur | Anggota Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas<br>Member of the Integrated Governance Committee of Sinar Mas Financial Conglomerate |
| Sungkana | Komisaris Independen PT Sinar Mas Sekuritas<br>Independent Commissioner of PT Sinar Mas Sekuritas | Anggota Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas<br>Member of the Integrated Governance Committee of Sinar Mas Financial Conglomerate |
| Irawan Chandra | Komisaris Independen PT Sinarmas Asset Management<br>Independent Commissioner of PT Sinarmas Asset Management | Anggota Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas<br>Member of the Integrated Governance Committee of Sinar Mas Financial Conglomerate |
| Mulabasa Hutabarat | Komisaris Independen PT Sinar Mas Multifinance<br>Independent Commissioner of PT Sinar Mas Multifinance | Anggota Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas<br>Member of the Integrated Governance Committee of Sinar Mas Financial Conglomerate |
| Herry Hermana | Komisaris Independen PT AB Sinar Mas Multifinance<br>Independent Commissioner of PT AB Sinar Mas Multifinance | Anggota Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas<br>Member of the Integrated Governance Committee of Sinar Mas Financial Conglomerate |
| Horas Parsaulian Pardede | Komisaris Independen PT Bank Nano Syariah<br>Independent Commissioner of PT Bank Nano Syariah | Anggota Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas<br>Member of the Integrated Governance Committee of Sinar Mas Financial Conglomerate |
| Ahmadi Sukarno. LC.M.A | Dewan Pengawas Syariah PT Bank Nano Syariah<br>Sharia Supervisory Board of PT Bank Nano Syariah | Anggota Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas<br>Member of the Integrated Governance Committee of Sinar Mas Financial Conglomerate |
| Mochammad Bukhori Muslim | Dewan Pengawas Syariah PT Bank Nano Syariah<br>Sharia Supervisory Board of PT Bank Nano Syariah | Anggota Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas<br>Member of the Integrated Governance Committee of Sinar Mas Financial Conglomerate |
| Muhammad Faisal Muchtar | Dewan Pengawas UUS PT Asuransi Sinar Mas<br>Supervisory Board of UUS PT Asuransi Sinar Mas | Anggota Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas<br>Member of the Integrated Governance Committee of Sinar Mas Financial Conglomerate |
| H. Ahmad Nuryadi Asmawi | Dewan Pengawas UUS PT Asuransi Simas Jiwa<br>Supervisory Board of UUS PT Asuransi Simas Jiwa | Anggota Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas<br>Member of the Integrated Governance Committee of Sinar Mas Financial Conglomerate |
| Luqyan Tamanni | Dewan Pengawas UUS PT Sinar Mas Multifinance dan PT Reasuransi Nusantara Makmur<br>Supervisory Board of UUS PT Sinar Mas Multifinance and PT Reasuransi Nusantara Makmur | Anggota Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas<br>Member of the Integrated Governance Committee of Sinar Mas Financial Conglomerate |
| Muhammad Fahri Farid | Dewan Pengawas UUS PT Reasuransi Nusantara Makmur<br>Supervisory Board of UUS PT Reasuransi Nusantara Makmur | Anggota Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas<br>Member of the Integrated Governance Committee of Sinar Mas Financial Conglomerate |
| Reynold M Batubara | Pihak Independen PT Bank Sinarmas<br>Independent Party PT Bank Sinarmas | Anggota Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas<br>Member of the Integrated Governance Committee of Sinar Mas Financial Conglomerate |

## Profil Anggota Komite Tata Kelola Terintegrasi

Profil anggota Komite Tata Kelola Terintegrasi, terdiri dari:

1. Komisaris Independen yang ditunjuk sebagai Ketua sekaligus anggota Komite dari Bank Sinarmas selaku Entitas Utama;

## Profile of Integrated Governance Committee Members

Profile of Integrated Governance Committee members, consisting of:

1. Independent Commissioner appointed as Chairman and member of the Committee from Bank Sinarmas as the Main Entity;

2. Komisaris Independen dari Lembaga Jasa Keuangan (LJK) Konglomerasi Keuangan sebagai anggota Komite;
3. Pihak Independen Bank Sinarmas sebagai anggota Komite; dan
4. Dewan Pengawas Syariah bagi LJK yang menjalankan prinsip usaha secara syariah sebagai anggota komite.

2. Independent Commissioner from Financial Services Institution (LJK) Financial Conglomerate as a member of the Committee;
3. Independent Party of Bank Sinarmas as a member of the Committee; and
4. Sharia Supervisory Board for LJK that implements sharia business principles as a member of the committee.

| PT. Bank Sinarmas Tbk. | |
|---|---|
| **Sammy Kristamuljana**<br>Komisaris Independen<br>Independent Commissioner | |
| **Dasar Hukum Pengangkatan Jabatan**<br>**Legal Basis for Appointment to Position** | Surat Gubernur Bank Indonesia No.14/61/GBI/DPIP/ Rahasia tanggal 3 Juli 2012 perihal Keputusan atas Pencalonan Komisaris Independen PT. Bank Sinarmas Tbk.<br>Letter of the Governor of Bank Indonesia No.14/61/GBI/DPIP/Secret dated July 3, 2012 regarding the Decision on the Nomination of Independent Commissioner of PT. Bank Sinarmas Tbk. |
| **Dasar Hukum Pengangkatan Anggota Komite**<br>**Legal Basis for Appointment to Committee Members** | Memorandum No. 032/2024/DIRUT-EU tanggal 6 Desember 2024 tentang Susunan Keanggotaan Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas.<br>Memo M.020/2023/DIRUT-EU dated November 30, 2023 regarding the Composition of Membership of the Integrated Governance Committee of the Sinar Mas Financial Conglomerate. |

Profil lebih rinci dapat dilihat pada Profil Dewan Komisaris bab Profil Perusahaan dalam Laporan Tahunan dan Keberlanjutan ini.
A more detailed profile can be seen in the Board of Commissioners Profile in the Company Profile chapter in this Annual and Sustainability Report.

| PT Bank Nano Syariah | |
|---|---|
| **Horas Parsaulian Pardede**<br>Komisaris Independen<br>Independent Commissioner | |
| **Kewarganegaraan**<br>**Citizenship** | Indonesia |
| **Domisili**<br>**Domicile** | Depok |
| **Usia**<br>**Age** | 59 tahun \| years old |
| **Dasar Hukum Pengangkatan Jabatan**<br>**Legal Basis for Appointment to Position** | Akta Pernyataan Pemegang Saham No.1 Tanggal 2 Januari 2024<br>Shareholders› Statement Deed No. 1 Dated January 2, 2024 |
| **Dasar Hukum Pengangkatan Anggota Komite**<br>**Legal Basis for Appointment of Committee Members** | Memorandum No. 032/2024/DIRUT-EU tanggal 6 Desember 2024 tentang Susunan Keanggotaan Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas.<br>Memorandum No. 032/2024/DIRUT-EU dated December 6, 2024 concerning the Composition of the Integrated Governance Committee of the Sinar Mas Financial Conglomerate. |
| **Riwayat Pendidikan**<br>**Education History** | S1 Manajemen Keuangan - Fakultas Ekonomi UI Ekstension (1996)<br>S1 Financial Management - Faculty of Economics UI Extension (1996) |
| **Riwayat Pekerjaan**<br>**Employment History** | • Komisaris Independen Bank Nano Syariah (2024 - Sekarang)<br>• PT Armadian Tri Tunggal – Komisaris (2021-Sekarang)<br>• PT Berau Coral Energy Tbk. - GM CSR dan Ketua Yayasan Dharma Bhakti (2016 – Sekarang)<br>• Independent Commissioner of Bank Nano Syariah (2024 - Present)<br>• PT Armadian Tri Tunggal - Commissioner (2021-Present)<br>• PT Berau Coral Energy Tbk. - GM CSR and Chairman of the Dharma Bhakti Foundation (2016 - Present) |
| **Hubungan Afiliasi**<br>**Affiliation** | Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.<br>Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders. |

| **Ahmadi Sukarno. LC.M.A**<br>Dewan Pengawas Syariah<br>Sharia Supervisory Board | |
|---|---|
| **Kewarganegaraan**<br>**Citizenship** | Indonesia |
| **Domisili**<br>**Domicile** | Bogor |
| **Usia**<br>**Age** | 57 tahun I years old |
| **Dasar Hukum Pengangkatan Jabatan**<br>**Legal Basis for Appointment to Position** | Akta Pernyataan Pemegang Saham No.1 Tanggal 2 Januari 2024<br>Shareholders› Statement Deed No. 1 Dated January 2, 2024 |
| **Dasar Hukum Pengangkatan Anggota Komite**<br>**Legal Basis for Appointment of Committee Members** | Memorandum No. 032/2024/DIRUT-EU tanggal 6 Desember 2024 tentang Susunan Keanggotaan Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas.<br>Memorandum No. 032/2024/DIRUT-EU dated December 6, 2024 concerning the Composition of Membership of the Integrated Governance Committee of the Sinar Mas Financial Conglomerate. |
| **Riwayat Pendidikan**<br>**Education History** | • Doktor Pendidikan Islam, Universitas Ibn Khaldun (UIKA), Bogor (2015);<br>• Magister Ekonomi Islam, Universitas Islam Negeri (UIN) Jakarta (2004);<br>• Magister Agama Islam, Universitas Ibn Khaldun (UIKA), Bogor (2002); dan<br>• Sarjana Syariah, Fakultas Syariah Ma'had Al-Ulum Al-Islamiyah Wa Arabiyah,<br>• Universitas Islam Imam Muhammad bin Saud (1994)<br>• Doctor of Islamic Education, Universitas Ibn Khaldun (UIKA), Bogor (2015);<br>• Master of Islamic Economics, Universitas Islam Negeri (UIN) Jakarta (2004);<br>• Master of Islamic Religion, Universitas Ibn Khaldun (UIKA), Bogor (2002); and<br>• Bachelor of Sharia, Faculty of Sharia, Ma'had Al-Ulum Al-Islamiyah Wa Arabiyah,<br>• Imam Muhammad bin Saud Islamic University (1994) |
| **Riwayat Pekerjaan**<br>**Employment History** | • DPS Bank Nano Syariah (2024 – Sekarang)<br>• STIT Fatahillah Bogor – Dosen (2019 - Sekarang)<br>• DPS Bank Nano Syariah (2024 - Present)<br>• STIT Fatahillah Bogor - Lecturer (2019 - Present) |
| **Hubungan Afiliasi**<br>**Affiliation** | Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.<br>Has no affiliation with members of the Board of Commissioners, Directors, and Controlling Shareholders. |

| **Mochammad Bukhori Muslim**<br>Dewan Pengawas Syariah<br>Sharia Supervisory Board | |
|---|---|
| **Kewarganegaraan**<br>**Citizenship** | Indonesia |
| **Domisili**<br>**Domicile** | Jakarta |
| **Usia**<br>**Age** | 49 tahun I years old |
| **Dasar Hukum Pengangkatan Jabatan**<br>**Legal Basis for Appointment to Position** | Akta Pernyataan Pemegang Saham No.1 Tanggal 2 Januari 2024<br>Shareholder Statement Deed No. 1 Dated January 2, 2024 |
| **Dasar Hukum Pengangkatan Anggota Komite**<br>**Legal Basis for Appointment of Committee Members** | Memorandum No. 032/2024/DIRUT-EU tanggal 6 Desember 2024 tentang Susunan Keanggotaan Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas.<br>Memorandum No. 032/2024/DIRUT-EU dated December 6, 2024 concerning the Composition of Membership of the Integrated Governance Committee of the Sinar Mas Financial Conglomerate. |

| | |
|---|---|
| **Riwayat Pendidikan**<br>**Education History** | • Doktor Ekonomi Islam Universitas Islam Negeri (UIN) Syarif Hidayatullah Jakarta (2016);<br>• Magister Ekonomi Islam Universitas Islam Negeri (UIN) Syarif Hidayatullah Jakarta (2005);<br>• Sarjana Syariah Lembaga Pendidikan Indonesia-Amerika Jakarta (2006); dan<br>• Sarjana Bidang Muamalat Sekolah Tinggi Agama Islam Azziyadah Jakarta (2001)<br>• Doctor of Islamic Economics, Universitas Islam Negeri Syarif Hidayatullah Jakarta (2016);<br>• Master of Islamic Economics, Universitas Islam Negeri Syarif Hidayatullah Jakarta (2005);<br>• Bachelor of Sharia, Indonesian-American Educational Institution, Jakarta (2006); and<br>• Bachelor of Muamalat, Sekolah Tinggi Agama Islam Azziyadah, Jakarta (2001) |
| **Riwayat Pekerjaan**<br>**Employment History** | • DPS Bank Nano Syariah (2024 - Sekarang)<br>• DSN-MUI Ketua Bidang Ekonomi dan Bisnis Syariah (2020 - Sekarang)<br>• DPS Bank Nano Syariah (2024 - Present)<br>• DSN-MUI Head of Sharia Economics and Business (2020 - Present) |
| **Hubungan Afiliasi**<br>**Affiliation** | Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.<br>Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders. |

**PT Asuransi Sinar Mas**

| | |
|---|---|
| **Tonny Latidjan**<br>Komisaris Independen<br>Independent Commissioner | |
| **Kewarganegaraan**<br>**Citizenship** | Indonesia |
| **Domisili**<br>**Domicile** | Depok |
| **Usia**<br>**Age** | 63 tahun \| years old |
| **Dasar Hukum Pengangkatan Jabatan**<br>**Legal Basis for Appointment to Position** | Akta Pernyataan No. 55 tanggal 7 Agustus 2020 perihal Pernyataan Keputusan RUPS Luar Biasa - PT Asuransi Sinar Mas.<br>Deed of Statement No. 55 dated August 7, 2020 concerning the Statement of Resolutions of the Extraordinary GMS - PT Asuransi Sinar Mas. |
| **Dasar Hukum Pengangkatan Anggota Komite**<br>**Legal Basis for Appointment of Committee Members** | Memorandum No. 032/2024/DIRUT-EU tanggal 6 Desember 2024 tentang Susunan Keanggotaan Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas.<br>Memorandum No. 032/2024/DIRUT-EU dated December 6, 2024 concerning the Composition of Membership of the Integrated Governance Committee of the Sinar Mas Financial Conglomerate. |
| **Riwayat Pendidikan**<br>**Education History** | • *Master of Business Administration*, Newport University, United States of America (1988)<br>• Sarjana bidang Manajemen, Universitas Kristen Krida Wacana (sebelumnya Universitas Kristen Djaya) (1981)<br>• Master of Business Administration, Newport University, United States of America (1988)<br>• Bachelor of Management, Universitas Kristen Krida Wacana (formerly Universitas Kristen Djaya) (1981) |

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| **Riwayat Pekerjaan**<br>**Employment History** | • Anggota Komite Kebijakan Tata Kelola Perusahaan, PT Asuransi Sinar Mas (2022 - Sekarang)<br>• Komisaris Independen PT Asuransi Sinar Mas (Agustus 2020 - Sekarang)<br>• Direktur, PT Toko Onderdil Karya Utama, PT Jakarta Teknologi Utama, dan PT Premium Garansi Indonesia (2018- 2018)<br>• Kepala Divisi Motor Business Unit (MBU) & Personal Line Division (PLD), PT Asuransi Sinar Mas (2016 – 2018)<br>• Kepala Divisi Motor Business Unit (MBU), PT Asuransi Sinar Mas (2007 – 2016)<br>• Kepala Divisi Motor Business Unit (MBU), Pimpinan Wilayah 5 & PJS Pimpinan Wilayah 4, PT Asuransi Sinar Mas (2006 – 2007)<br>• Kepala Divisi Motor Business Unit (MBU) Pimpinan Wilayah 5, PT Asuransi Sinar Mas (2005 – 2006)<br>• Kepala Divisi Motor Business Unit (MBU) &Pimpinan Wilayah 3, PT Asuransi Sinar Mas (2004 – 2005)<br>• Kepala Divisi Motor Business Unit (MBU), PT Asuransi Sinar Mas (2003 – 2004)<br>• Pjs. Kepala Bagian Klaim Motor Business Unit (MBU), PT Asuransi Sinar Mas (April 2003 – Juli 2003)<br>• *Branch Coordinator Claim* MBU, PT Asuransi Sinar Mas (2001 – 2003)<br>• Project Officer, PT Asuransi Jiwa Sinar Mas MSIG (dh. PT Asuransi Jiwa Eka Life) (1999 – 2001)<br>• *Financial Consultant*, PT Asuransi Jiwa Sinar Mas MSIG (dh. PT Asuransi Jiwa Eka Life) (Oktober 1998 – Desember 1998)<br>• *Marketing Manager*, PT Sanjaya Sakti (SANYO) (1996 – 1998)<br>• *Purchasing Division Manager*, PT Kenari Djaja Prima (1992 – 1996)<br>• *Marketing Manager,* PT Centra Nusa Insan Cemerlang (dh. PT Nusantara Sun Chlorela Tama) (1991 – 1992)<br>• Tenaga Pengajar, Universitas Kristen Krida Wacana (dh. Universitas Kristen Djaya) (1988 – 1996)<br>• *Marketing Manager,* PT Sinar Mega Sakti (1986 – 1989)<br>• *Staff Marketing*, PT Sinar Mega Sakti (1984 – 1986)<br>• Member of the Corporate Governance Policy Committee, PT Asuransi Sinar Mas (2022 - Present)<br>• Independent Commissioner of PT Asuransi Sinar Mas (August 2020 - Present)<br>• Director, PT Toko Onderdil Karya Utama, PT Jakarta Teknologi Utama, and PT Premium Garansi Indonesia (2018-2018)<br>• Head of Motor Business Unit (MBU) & Personal Line Division (PLD), PT Asuransi Sinar Mas (2016 - 2018)<br>• Head of Motor Business Unit (MBU) Division, PT Asuransi Sinar Mas (2007 - 2016)<br>• Head of Motor Business Unit (MBU) Division, Regional Head 5 & PJS Regional Head 4, PT Asuransi Sinar Mas (2006 - 2007)<br>• Head of Motor Business Unit (MBU) Division, Regional Leadership 5, PT Asuransi Sinar Mas (2005 – 2006)<br>• Head of Motor Business Unit (MBU) Division & Regional Leadership 3, PT Asuransi Sinar Mas (2004 – 2005)<br>• Head of Motor Business Unit (MBU) Division, PT Asuransi Sinar Mas (2003 – 2004)<br>• Acting. Head of Claims Division of Motor Business Unit (MBU), PT Asuransi Sinar Mas (April 2003 – July 2003)<br>• Branch Coordinator Claim MBU, PT Asuransi Sinar Mas (2001 – 2003)<br>• Project Officer, PT Asuransi Jiwa Sinar Mas MSIG (formerly PT Asuransi Jiwa Eka Life) (1999 – 2001)<br>• Financial Consultant, PT Asuransi Jiwa Sinar Mas MSIG (formerly PT Asuransi Jiwa Eka Life) (October 1998 – December 1998)<br>• Marketing Manager, PT Sanjaya Sakti (SANYO) (1996 – 1998)<br>• Purchasing Division Manager, PT Kenari Djaja Prima (1992 – 1996)<br>• Marketing Manager, PT Centra Nusa Insan Cemerlang (formerly PT Nusantara Sun Chlorela Tama) (1991 – 1992)<br>• Lecturer, University Kristen Krida Wacana (graduate of Djaya Christian University) (1988 – 1996)<br>• Marketing Manager, PT Sinar Mega Sakti (1986 – 1989)<br>• Marketing Staff, PT Sinar Mega Sakti (1984 – 1986) |
| **Hubungan Afiliasi**<br>**Affiliation** | Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.<br>Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders. |

| **Muhammad Faisal Muchtar**<br>Dewan Pengawas UUS<br>UUS Supervisory Board | |
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| **Kewarganegaraan**<br>**Citizenship** | Indonesia |
| **Domisili**<br>**Domicile** | Jakarta |
| **Usia**<br>**Age** | 52 tahun I years old |
| **Dasar Hukum Pengangkatan Jabatan**<br>**Legal Basis for Appointment to Position** | KEP-4/NB.21/2021 tanggal 24 Februari 2021- DPS UUS Asuransi Sinar Mas.<br>KEP-4/NB.21/2021 dated 24 February 2021- DPS UUS Asuransi Sinar Mas. |
| **Dasar Hukum Pengangkatan Anggota Komite**<br>**Legal Basis for Appointment of Committee Members** | Memorandum No. 032/2024/DIRUT-EU tanggal 6 Desember 2024 tentang Susunan Keanggotaan Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas.<br>Memorandum No. 032/2024/DIRUT-EU dated 6 December 2024 concerning the Composition of Membership of the Integrated Governance Committee of the Sinar Mas Financial Conglomerate. |
| **Riwayat Pendidikan**<br>**Education History** | • Doktor Hukum Ekonomi Islam, Universitas Islam Indonesia (2020 – Sekarang)<br>• Master / Pasca Sarjana di bidang *Islamic Economy*, Universitas Islam Indonesia (2003 – 2005)<br>• Program Magister Ushul Fiqh, Universitas Al – Azhar Kairo, Mesir (1998 – 2000)<br>• Sarjana Syariah Universitas Al –Azhar Kairo, Mesir (1994 – 1998)<br>• Doctor of Islamic Economic Law, Universitas Islam Indonesia (2020 – Present)<br>• Master / Postgraduate in Islamic Economy, Universitas Islam Indonesia (2003 – 2005)<br>• Master Program in Usul Fiqh, Al – Azhar University Cairo, Egypt (1998 – 2000)<br>• Bachelor of Sharia, Al – Azhar University Cairo, Egypt (1994 – 1998) |
| **Riwayat Pekerjaan**<br>**Employment History** | • Ketua Badan Penasihat Syariah Sinar Mas Syariah (2020-sekarang)<br>• Ketua Dewan Penasihat Syariah PT Reliance Finance, Jakarta (2018-sekarang)<br>• Ketua Badan Penasihat Syariah PT Al Ijarah Indonesia Finance (ALIF) (2015-sekarang)<br>• PT Bank BTPN Syariah Tbk (2014-2019)<br>- Anggota Komite Manajemen Risiko<br>- Anggota Komite Audit<br>• *Senior Manager, Corporate legal & Corporate communication Head* PT Al Ijarah Indonesia Finance (2014-2015)<br>• *Malaysia Assignment: Assistant General Manager - Shariah Head* Syarikat Takaful Malaysia Berhad (STMB) Kuala Lumpur (2011-2013)<br>• *Senior Manager (Department Head, Sharia Audit)* (2010)<br>• *Head Quarter (HQ)* PT Bank Muamalat Indonesia Tbk (2009-2010)<br>• *Senior Manager & Sharia Compliance Head* of PT Bank Syariah Mega Indonesia (BSMI) (2009)<br>• Medan *Regional Branch & Head Quarter* PT Bank Muamalat Indonesia Tbk (2003-2007)<br>• Chairman of the Sharia Advisory Board of Sinar Mas Syariah (2020-present)<br>• Chairman of the Sharia Advisory Board of PT Reliance Finance, Jakarta (2018-present)<br>• Chairman of the Sharia Advisory Board of PT Al Ijarah Indonesia Finance (ALIF) (2015-present)<br>• PT Bank BTPN Syariah Tbk (2014-2019)<br>- Member of the Risk Management Committee<br>- Member of the Audit Committee<br>• Senior Manager, Corporate legal & Corporate communication Head PT Al Ijarah Indonesia Finance (2014-2015)<br>• Malaysia Assignment: Assistant General Manager - Shariah Head Syarikat Takaful Malaysia Berhad (STMB) Kuala Lumpur (2011-2013)<br>• Senior Manager (Department Head, Sharia Audit) (2010)<br>• Head Quarter (HQ) PT Bank Muamalat Indonesia Tbk (2009-2010)<br>• Senior Manager & Sharia Compliance Head of PT Bank Syariah Mega Indonesia (BSMI) (2009)<br>• Medan Regional Branch & Head Quarter PT Bank Muamalat Indonesia Tbk (2003-2007) |
| **Hubungan Afiliasi**<br>**Affiliation** | Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.<br>Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders. |

| PT Asuransi Simas Jiwa | |
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| **Aditiawan Chandra**<br>Komisaris Independen<br>Independent Commissioner | |
| **Kewarganegaraan**<br>**Citizenship** | Indonesia |
| **Domisili**<br>**Domicile** | Jakarta |
| **Usia**<br>**Age** | 75 tahun \| years old |
| **Dasar Hukum Pengangkatan Jabatan**<br>**Legal Basis for Appointment to Position** | Akta Pernyataan Keputusan Sirkular No. 11 tanggal 02 Maret 2020 - PT Asuransi Simas Jiwa.<br>Circular Decision Statement Deed No. 11 dated March 2, 2020 - PT Asuransi Simas Jiwa. |
| **Dasar Hukum Pengangkatan Anggota Komite**<br>**Legal Basis for Appointment of Committee Members** | Memorandum No. 032/2024/DIRUT-EU tanggal 6 Desember 2024 tentang Susunan Keanggotaan Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas.<br>Memorandum No. 032/2024/DIRUT-EU dated December 6, 2024 concerning the Composition of Membership of the Integrated Governance Committee of the Sinar Mas Financial Conglomerate. |
| **Riwayat Pendidikan**<br>**Education History** | • *Philosophy Doctor* bidang Perencanaan Ekonomi Daerah, *Department City and Regional Planning*, University of North Carolina-Chapel Hill (1985)<br>• *Master of Science* bidang Perencanaan dan Keuangan, *Department Urban and Regional Planning*, University of Wisconsin-Madison (1980)<br>• Sarjana Ekonomi bidang Pemasaran, Fakultas Ekonomi, Universitas Indonesia (1977)<br>• Philosophy Doctor in Regional Economic Planning, Department City and Regional Planning, University of North Carolina-Chapel Hill (1985)<br>• Master of Science in Planning and Finance, Department Urban and Regional Planning, University of Wisconsin-Madison (1980)<br>• Bachelor of Economics in Marketing, Faculty of Economics, Universitas Indonesia (1977) |
| **Riwayat Pekerjaan**<br>**Employment History** | • Komisaris Independen PT Asuransi Simas Jiwa (2006-sekarang)<br>• Dekan, Fakultas Ekonomi Universitas Indonesia (2001-2005)<br>• Presiden Komisaris, PT Bank Permata Tbk (2002-2004)<br>• *Advisory Committee* Penjualan Bank Niaga Tbk. (2002-2003)<br>• Komisaris, PT Bank Internasional Indonesia (BII) Tbk (1999-2001)<br>• Direktur Program Magister MMUI (1997-2000)<br>• Asisten Menteri Negara Investasi Bidang Iklim Usaha/BKPM (1994-1997)<br>• *President Director*, Lembaga Manajemen (1992-1997)<br>• Komisaris Independen, PT Semen Padang Tbk. ( 1990-1995)<br>• Managing Director, Association Of Management Institute and The Flagler Management (1989-1992)<br>• Independent Commissioner of PT Asuransi Simas Jiwa (2006-present)<br>• Dean, Faculty of Economics, Universitas Indonesia (2001-2005)<br>• President Commissioner, PT Bank Permata Tbk (2002-2004)<br>• Advisory Committee for Sales of Bank Niaga Tbk. (2002-2003)<br>• Commissioner, PT Bank Internasional Indonesia (BII) Tbk (1999-2001)<br>• Director of MMUI Masters Program (1997-2000)<br>• Assistant Minister of State for Investment in Business Climate/BKPM (1994-1997)<br>• President Director, Management Institute (1992-1997)<br>• Independent Commissioner, PT Semen Padang Tbk. (1990-1995)<br>• Managing Director, Association Of Management Institute and The Flagler Management (1989-1992) |
| **Hubungan Afiliasi**<br>**Affiliation** | Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.<br>Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders. |

**H. Ahmad Nuryadi Asmawi**
Dewan Pengawas UUS
UUS Supervisory Board

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| **Kewarganegaraan**<br>**Citizenship** | Indonesia |
| **Domisili**<br>**Domicile** | Jakarta |
| **Usia**<br>**Age** | 61 tahun I years old |
| **Dasar Hukum Pengangkatan Jabatan**<br>**Legal Basis for Appointment to Position** | Pengangkatan anggota DPS melalui mekanisme dan persetujuan RUPS seperti dinyatakan dalam Akta No. 446 tanggal 12 Mei 2023.<br>Pengangkatan anggota DPS telah mendapat rekomendasi dan penetapan dari DSN MUI melalui Surat DSN MUI No.U-583/DSN-MUI /XI/2016 perihal Rekomendasi Dewan Pengawas Syariah<br>The appointment of DPS members through the mechanism and approval of the GMS as stated in Deed No. 446 dated May 12, 2023.<br>The appointment of DPS members has received recommendations and determination from the DSN MUI through DSN MUI Letter No. U-583 / DSN-MUI / XI / 2016 regarding Recommendations of the Sharia Supervisory Board |
| **Dasar Hukum Pengangkatan Anggota Komite**<br>**Legal Basis for Appointment of Committee Members** | Memorandum No. 032/2024/DIRUT-EU tanggal 6 Desember 2024 tentang Susunan Keanggotaan Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas.<br>Memorandum No. 032/2024 / DIRUT-EU dated December 6, 2024 concerning the Composition of Membership of the Integrated Governance Committee of the Sinar Mas Financial Conglomerate |
| **Riwayat Pendidikan**<br>**Education History** | • S2 *Faculty of Islamic Revealed Knowledge and Heritage*, International Islamic University Kuala Lumpur (1995)<br>• S1 *Faculty Sharia and Law*, International Islamic University, Islamabad, Pakistan (1991) |
| **Riwayat Pekerjaan**<br>**Employment History** | • Dewan Pengawas UUS PT Asuransi Simas Jiwa (2015-Sekarang)<br>• Sharia Compliance Officer at Compliance Division Bank Muamalat Indonesia (Tahun 2006-2017)<br>• Training Officer at Muamalat Institute (Tahun 1999-2006)<br>• Dosen Studi Islam Fikih Muamalah, Universitas Juanda, Ciawi Bogor (Tahun 1998 (satu tahun))<br>• Dosen Studi Islam Universitas Islam Attahiriyah Jakarta (Tahun 1997 (Satu tahun))<br>• Imam and Religious Worker at Islamic Center, Christmas Island, Western Australia (Tahun 1995-1996)<br>• Supervisory Board of UUS PT Asuransi Simas Jiwa (2015-Present)<br>• Sharia Compliance Officer at Compliance Division Bank Muamalat Indonesia (Year 2006-2017)<br>• Training Officer at Muamalat Institute (Year 1999-2006)<br>• Lecturer of Islamic Studies Fikih Muamalah, Juanda University, Ciawi Bogor (Year 1998 (one year))<br>• Lecturer of Islamic Studies at Attahiriyah Islamic University Jakarta (Year 1997 (One year))<br>• Imam and Religious Worker at Islamic Center, Christmas Island, Western Australia (Year 1995-1996) |
| **Hubungan Afiliasi**<br>**Affiliation** | Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.<br>Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders. |

| PT Reasuransi Nusantara Makmur | |
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| **Mohammad Shaifie Zein**<br>Komisaris Independen<br>Independent Commissioner | |
| **Kewarganegaraan**<br>**Citizenship** | Indonesia |
| **Domisili**<br>**Domicile** | Bekasi |
| **Usia**<br>**Age** | 55 tahun \| years old |
| **Dasar Hukum Pengangkatan Jabatan**<br>**Legal Basis for Appointment to Position** | KEP-486/PD.02/2024 Perihal Hasil Penilaian Kemampuan dan Kepatutan Sdr. Mohammad Shaifie Zein Selaku Calon Komisaris Independen PT Reasuransi Nusantara Makmur Tanggal 30 Agustus 2024<br>KEP-486/PD.02/2024 Regarding the Results of the Fit and Proper Assessment of Mr. Mohammad Shaifie Zein as a Candidate for Independent Commissioner of PT Reasuransi Nusantara Makmur Dated August 30, 2024 |
| **Dasar Hukum Pengangkatan Anggota Komite**<br>**Legal Basis for Appointment of Committee Members** | Memorandum No. 032/2024/DIRUT-EU tanggal 6 Desember 2024 tentang Susunan Keanggotaan Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas.<br>Memorandum No. 032/2024/DIRUT-EU dated December 6, 2024 concerning the Composition of Membership of the Integrated Governance Committee of the Sinar Mas Financial Conglomerate. |
| **Riwayat Pendidikan**<br>**Education History** | *Post Graduate* Diploma – Glasgow Caledonian University (1997 – 1999) |
| **Riwayat Pekerjaan**<br>**Employment History** | • Komisaris Independen PT Reasuransi Nusantara Makmur (2024 - Sekarang)<br>• Direktur Utama PT Asuransi FPG Indonesia (2022 – 2024)<br>• Independent Commissioner of PT Reasuransi Nusantara Makmur (2024 - Present)<br>• President Director of PT Asuransi FPG Indonesia (2022 – 2024) |
| **Hubungan Afiliasi**<br>**Affiliation** | Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.<br>Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders. |

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| **Muhammad Fahri Farid**<br>Dewan Pengawas UUS<br>UUS Supervisory Board | |
| **Kewarganegaraan**<br>**Citizenship** | Indonesia |
| **Domisili**<br>**Domicile** | Bekasi |
| **Usia**<br>**Age** | 56 tahun \| years old |
| **Dasar Hukum Pengangkatan Jabatan**<br>**Legal Basis for Appointment to Position** | KEP-77/NB.22/2019 Perihal Hasil Penilaian Kemampuan dan Kepatutan Sdr. Muhammad Fahri Farid Selaku Calon Dewan Pengawas Syariah PT Reasuransi Nusantara Makmur Tanggal 23 Desember 2019<br>KEP-77/NB.22/2019 Regarding the Results of the Fit and Proper Assessment of Mr. Muhammad Fahri Farid as a Candidate for the Sharia Supervisory Board of PT Reasuransi Nusantara Makmur Dated December 23, 2019 |
| **Dasar Hukum Pengangkatan Anggota Komite**<br>**Legal Basis for Appointment of Committee Members** | Memorandum No. 032/2024/DIRUT-EU tanggal 6 Desember 2024 tentang Susunan Keanggotaan Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas.<br>Memorandum No. 032/2024/DIRUT-EU dated December 6, 2024 concerning the Composition of Membership of the Integrated Governance Committee of the Sinar Mas Financial Conglomerate. |
| **Riwayat Pendidikan**<br>**Education History** | • S3 Manajemen – Universitas Negeri Jakarta (2022)<br>• S2 Magister Manajemen - Universitas Esa Unggul (2007)<br>• S1 Agribisnis - Universitas Padjadjaran (1993)<br>• Doctoral Degree in Management - Universitas Negeri Jakarta (2022)<br>• Master of Management – Universitas Esa Unggul (2007)<br>• Bachelor's Degree in Agribusiness – Universitas Padjadjaran (1993) |

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| **Riwayat Pekerjaan**<br>Employment History | • Dewan Pengawas UUS PT Reasuransi Nusantara Makmur (2020 - Sekarang)<br>• Direktur Sub Business Unit PT Asuransi Takaful Keluarga (2012 – 2014)<br>• Supervisory Board of UUS PT Reasuransi Nusantara Makmur (2020 - Present)<br>• Director of Sub Business Unit PT Asuransi Takaful Keluarga (2012 - 2014) |
| **Hubungan Afiliasi**<br>Affiliation | Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.<br>Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders. |

**PT Asuransi Simas Insurtech**

**J. Chandra Setiawan Puspito**
Komisaris Independen
Independent Commissioner

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| **Kewarganegaraan**<br>Citizenship | Indonesia |
| **Domisili**<br>Domicile | Bandung, Jawa Barat |
| **Usia**<br>Age | 70 tahun \| years old |
| **Dasar Hukum Pengangkatan Jabatan**<br>Legal Basis for Appointment to Position | Akta Notaris Nomor 545 tanggal 7 November 2022<br>Notarial Deed Number 545 dated November 7, 2022 |
| **Dasar Hukum Pengangkatan Anggota Komite**<br>Legal Basis for Appointment of Committee Members | Memorandum No. 032/2024/DIRUT-EU tanggal 6 Desember 2024 tentang Susunan Keanggotaan Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas.<br>Memorandum No. 032/2024/DIRUT-EU dated December 6, 2024 concerning the Composition of Membership of the Integrated Governance Committee of the Sinar Mas Financial Conglomerate. |
| **Riwayat Pendidikan**<br>Education History | • STM Strada, Jakarta (1971-1974) |
| **Riwayat Pekerjaan**<br>Employment History | • Komisaris Independen PT Asuransi Simas Insurtech (2017-Sekarang)<br>• Pimpinan Wilayah dan Kepala Divisi Marketing di PT Asuransi Sinar Mas (1990-2010)<br>• Deputy Manager di PT Asuransi Wahana Tata (1983-1990)<br>• Kepala Bagian Logistik di PT Cahaya Lestari Indonesia (1980-1982)<br>• Supervisor di PT Star Motors (1976-1979)<br>• Independent Commissioner of PT Asuransi Simas Insurtech (2017-Present)<br>• Regional Leader and Head of Marketing Division at PT Asuransi Sinar Mas (1990-2010)<br>• Deputy Manager at PT Asuransi Wahana Tata (1983-1990)<br>• Head of Logistics at PT Cahaya Lestari Indonesia (1980-1982)<br>• Supervisor at PT Star Motors (1976-1979) |
| **Hubungan Afiliasi**<br>Affiliation | Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.<br>Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders. |

**PT Asuransi Sumit Oto**

**Rohana Sumihar**
Komisaris Independen
Independent Commissioner

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| **Kewarganegaraan**<br>Citizenship | Indonesia |
| **Domisili**<br>Domicile | Jakarta |
| **Usia**<br>Age | 70 tahun \| years old |

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| **Dasar Hukum Pengangkatan Jabatan**<br>**Legal Basis for Appointment to Position** | Akta No.1 tanggal 2 Maret 2011 (awal)<br>Akta No. 110 tanggal 4 April 2023 (terbaru)<br>Deed No. 1 dated March 2, 2011 (initial)<br>Deed No. 110 dated April 4, 2023 (latest) |
| **Dasar Hukum Pengangkatan Anggota Komite**<br>**Legal Basis for Appointment of Committee Members** | Memorandum No. 032/2024/DIRUT-EU tanggal 6 Desember 2024 tentang Susunan Keanggotaan Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas.<br>Memorandum No. 032/2024/DIRUT-EU dated December 6, 2024 concerning the Composition of Membership of the Integrated Governance Committee of the Sinar Mas Financial Conglomerate. |
| **Riwayat Pendidikan**<br>**Education History** | • S2 Magister Management, (Konsentrasi Keuangan) Universitas IPWIJA, Jakarta (2000)<br>• Diploma in Financial Management, Connecticut of University, USA (1985)<br>• Sarjana Ekonomi, Universitas Kristen Indonesia, Jakarta (1980)<br>• Master of Management, (Finance Concentration) Universitas IPWIJA, Jakarta (2000)<br>• Diploma in Financial Management, Connecticut of University, USA (1985)<br>• Bachelor of Economics, Universitas Kristen Indonesia, Jakarta (1980) |
| **Riwayat Pekerjaan**<br>**Employment History** | • Komisaris Independen PTAsuransi Sumit Oto (2011 - Sekarang)<br>• Pegawai Negeri Sipil di Departemen Keuangan Kasubag Multilateral, Sekretariat Badan Pengawas Pasar Modal dan Lembaga Keuangan (2008-2010)<br>• Independent Commissioner of PT Asuransi Sumit Oto (2011 - Present)<br>• Civil Servant at the Ministry of Finance, Head of Multilateral Sub-Division, Secretariat of the Capital Market and Financial Institutions Supervisory Agency (2008-2010) |
| **Hubungan Afiliasi**<br>**Affiliation** | Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.<br>Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders. |

**PT Sinarmas Sekuritas**

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| **Sungkana**<br>Komisaris Independen<br>Independent Commissioner | |
| **Kewarganegaraan**<br>**Citizenship** | Indonesia |
| **Domisili**<br>**Domicile** | Depok |
| **Usia**<br>**Age** | 64 tahun I years old |
| **Dasar Hukum Pengangkatan Jabatan**<br>**Legal Basis for Appointment to Position** | Akta Pernyataan Keputusan Rapat Umum Pemegang Saham Luar Biasa (RUPSLB) PT Sinarmas Sekuritas No. 1338 Tanggal 30 September 2021 yang dibuat di hadapan Syofilawati, S.H. Notaris Kota Bekasi.<br>Deed of Statement of Resolutions of the Extraordinary General Meeting of Shareholders (EGMS) of PT Sinarmas Sekuritas No. 1338 Dated September 30, 2021 made before Syofilawati, S.H. Notary of Bekasi City. |
| **Dasar Hukum Pengangkatan Anggota Komite**<br>**Legal Basis for Appointment of Committee Members** | Memorandum No. 032/2024/DIRUT-EU tanggal 6 Desember 2024 tentang Susunan Keanggotaan Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas.<br>Memorandum No. 032/2024/DIRUT-EU dated December 6, 2024 concerning the Composition of Membership of the Integrated Governance Committee of the Sinar Mas Financial Conglomerate. |
| **Riwayat Pendidikan**<br>**Education History** | • Washington College Of Law The American University – International Business Law – Strata 2 (1996)<br>• Universitas Indonesia – Fakultas Hukum – Strata 1 (1990)<br>• Washington College Of Law The American University – International Business Law – Strata 2 (1996)<br>• Universitas Indonesia – Faculty of Law – Strata 1 (1990) |

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| **Riwayat Pekerjaan**<br>**Employment History** | • Komisaris Independen PT Sinarmas Sekuritas (2021 – Sekarang)<br>• Komisaris Independen di PT Trinitan Metals and Minerals, Tbk (2018 – Sekarang)<br>• Komisaris Independen di PT LCK Global Kedaton, Tbk (2017 – Sekarang)<br>• Tenaga Pengajar di Program Pasca Sarjana FHUI (2016 – Sekarang)<br>• Bantuan Hukum di Kemenkeu (2011 – 2016)<br>• Kasubdit di Kemenkeu (2008 – 2011)<br>• Tenaga Pengajar di FHUI Program Kenotariatan (2005 -2009)<br>• Independent Commissioner of PT Sinarmas Sekuritas (2021 – Present)<br>• Independent Commissioner at PT Trinitan Metals and Minerals, Tbk (2018 – Present)<br>• Independent Commissioner at PT LCK Global Kedaton, Tbk (2017 – Present)<br>• Lecturer at FHUI Postgraduate Program (2016 – Present)<br>• Legal Aid at the Ministry of Finance (2011 – 2016)<br>• Head of Sub-Directorate at the Ministry of Finance (2008 – 2011)<br>• Lecturer at FHUI Notary Program (2005 -2009) |
| **Hubungan Afiliasi**<br>**Affiliation** | Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.<br>Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders. |

**PT Sinarmas Asset Management**

**Irawan Chandra**
Komisaris Independen
Independent Commissioner

| | |
|---|---|
| **Kewarganegaraan**<br>**Citizenship** | Indonesia |
| **Domisili**<br>**Domicile** | Jakarta |
| **Usia**<br>**Age** | 65 tahun I years old |
| **Dasar Hukum Pengangkatan Jabatan**<br>**Legal Basis for Appointment to Position** | Akta No. 24 Tanggal 31 Juli 2019 oleh Notaris Syofilawati, S.H.<br>Deed No. 24 dated July 31, 2019 by Notary Syofilawati, S.H. |
| **Dasar Hukum Pengangkatan Anggota Komite**<br>**Legal Basis for Appointment of Committee Members** | Memorandum No. 032/2024/DIRUT-EU tanggal 6 Desember 2024 tentang Susunan Keanggotaan Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas.<br>Memorandum No. 032/2024/DIRUT-EU dated December 6, 2024 concerning the Composition of Membership of the Integrated Governance Committee of the Sinar Mas Financial Conglomerate. |
| **Riwayat Pendidikan**<br>**Education History** | Bachelor Degree of Monash University / Accounting & Finance (1986) |
| **Riwayat Pekerjaan**<br>**Employment History** | • Komisaris Independen PT Sinarmas Asset Management (2019 – sekarang)<br>• Financial Advisor - KPMG Siddharta Advisory (2017 – 2019)<br>• Komisaris Independen (Mizuho-Balimor Finance) (2016 – 2017)<br>• International Consulting Group (2016 – 2017)<br>• Direktur Eksekutif (Nomura) (1997 – 2015)<br>• Senior Associate Director (Deutcshe Bank - Jakarta) (1996 – 1997)<br>• Kepala Bagian Pasar Modal (PT Bank International Indonesia Tbk) (1992 – 1996)<br>• Asisten Bendahara (Chase Manhattan Bank - Jakarta) (1989 – 1992)<br>• Junior Auditor (Panell Kerr Forster – Sydney, Australia) (1986 – 1989)<br>• Independent Commissioner of PT Sinarmas Asset Management (2019 – present)<br>• Financial Advisor - KPMG Siddharta Advisory (2017 – 2019)<br>• Independent Commissioner (Mizuho-Balimor Finance) (2016 – 2017)<br>• International Consulting Group (2016 – 2017)<br>• Executive Director (Nomura) (1997 – 2015)<br>• Senior Associate Director (Deutcshe Bank - Jakarta) (1996 – 1997)<br>• Head of Capital Market Division (PT Bank International Indonesia Tbk) (1992 – 1996)<br>• Assistant Treasurer (Chase Manhattan Bank - Jakarta) (1989 – 1992)<br>• Junior Auditor (Panell Kerr Forster – Sydney, Australia) (1986 – 1989) |
| **Hubungan Afiliasi**<br>**Affiliation** | Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.<br>Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders. |

| PT Sinar Mas Multifinance | |
|---|---|
| **Mulabasa Hutabarat**<br>Komisaris Independen<br>Independent Commissioner | |
| **Kewarganegaraan**<br>**Citizenship** | Indonesia |
| **Domisili**<br>**Domicile** | Jakarta |
| **Usia**<br>**Age** | 71 tahun I years old |
| **Dasar Hukum Pengangkatan Jabatan**<br>**Legal Basis for Appointment to Position** | Akta Pernyataan Keputusan Sirkuler Para Pemegang Saham di Luar RUPSLB no. 2458 tanggal 30 Januari 2023<br>Deed of Circular Resolution Statement of Shareholders Outside of EGMS no. 2458 dated January 30, 2023 |
| **Dasar Hukum Pengangkatan Anggota Komite**<br>**Legal Basis for Appointment of Committee Members** | Memorandum No. 032/2024/DIRUT-EU tanggal 6 Desember 2024 tentang Susunan Keanggotaan Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas.<br>Memorandum No. 032/2024/DIRUT-EU dated December 6, 2024 concerning the Composition of Membership of the Integrated Governance Committee of the Sinar Mas Financial Conglomerate. |
| **Riwayat Pendidikan**<br>**Education History** | • Pasca Sarjana (S2), Ekonomi, Indiana University / USA (1990)<br>• Sarjana (S1) Ekonomi, Studi Pembangunan, Universitas Indonesia (1982)<br>• Postgraduate (S2), Economics, Indiana University / USA (1990)<br>• Bachelor (S1) Economics, Development Studies, Universitas Indonesia (1982) |

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| **Riwayat Pekerjaan**<br>Employment History | • Komisaris Independen PT Sinar Mas Multifinance (2014-Sekarang)<br>• Komisaris Independen PT Nirmala Taruna. (2023-Sekarang)<br>• Komisaris Independen PT BRI LIFE. (2016-2021)<br>• Komisaris Independen PT Asuransi Jiwa Bringin Sejahtera. (2016-2021)<br>• Ketua Dewan Pengawas PT Indo Surya Capital Management. (2016-2019)<br>• Ketua Dewan Pengawas Badan Pengelola Jaminan Sosial Ketenagakerjaan. (2014-2016)<br>• Komisaris Independen PT Asuransi Jiwa Tugu Mandiri. (2014-2016)<br>• Sekretaris Badan Kebijakan Fiskal pada Badan Kebijakan Fiskal Kementerian Keuangan. (2013-2014)<br>• Kepala Biro Pembiayaan dan Penjaminan pada Bapepam-LK Kementerian Keuangan. (2012-2013)<br>• Komisaris PT Bank Tabungan Negara. (2008-2012)<br>• Kepala Biro Dana Pensiun pada Bapepam-LK Kementerian Keuangan. (2006-2012)<br>• Komisaris PT Pelindo I. (2002-2007)<br>• Sekretaris Direktorat Jendral pada Direktorat Jendral Lembaga Keuangan Kementerian Keuangan. (2000-2006)<br>• Kepala Subdirektorat pada Direktorat Perbankan dan Jasa Pembiayaan, Direktorat Jendral Lembaga Keuangan Kementerian Keuangan. (1999-2000)<br>• Kepala Seksi Peraturan Dana Pensiun dan Registrasi pada Sub Direktorat Dana Pensiun Pemberi Kerja, Direktorat Dana Pensiun, Direktorat Jendral Lembaga Keuangan Kementerian Keuangan. (1995-1999)<br>• Kepala Seksi Perhitungan Aktuaria pada Sub Direktorat Dana Pensiun Pemberi Kerja, Direktorat Dana Pensiun, Direktorat Jendral Lembaga Keuangan Kementerian Keuangan. (1993-1995)<br>• Kepala Seksi Aneka Industri pada Direktorat Investasi Direktorat Dana Moneter Dalam Negeri Kementerian Keuangan. (1985-1987)<br>• Kepala Seksi Administrasi dan Pengawasan Penerusan Pinjaman pada Direktorat Investasi Direktorat Dana Moneter Dalam Negeri Kementerian Keuangan. (1984-1985)<br>• Independent Commissioner of PT Sinar Mas Multifinance (2014-Present)<br>• Independent Commissioner of PT Nirmala Taruna. (2023-Present)<br>• Independent Commissioner of PT BRI LIFE. (2016-2021)<br>• Independent Commissioner of PT Asuransi Jiwa Bringin Sejahtera. (2016-2021)<br>• Chairman of the Supervisory Board of PT Indo Surya Capital Management. (2016-2019)<br>• Chairman of the Supervisory Board of the Employment Social Security Management Agency. (2014-2016)<br>• Independent Commissioner of PT Asuransi Jiwa Tugu Mandiri. (2014-2016)<br>• Secretary of the Fiscal Policy Agency at the Fiscal Policy Agency of the Ministry of Finance. (2013-2014)<br>• Head of the Financing and Guarantee Bureau at Bapepam-LK, Ministry of Finance. (2012-2013)<br>• Commissioner of PT Bank Tabungan Negara. (2008-2012)<br>• Head of the Pension Fund Bureau at Bapepam-LK, Ministry of Finance. (2006-2012)<br>• Commissioner of PT Pelindo I. (2002-2007)<br>• Secretary of the Directorate General at the Directorate General of Financial Institutions, Ministry of Finance. (2000-2006)<br>• Head of Sub-Directorate at the Directorate of Banking and Financing Services, Directorate General of Financial Institutions, Ministry of Finance. (1999-2000)<br>• Head of Section for Pension Fund Regulation and Registration at the Sub-Directorate of Employer Pension Funds, Directorate of Pension Funds, Directorate General of Financial Institutions, Ministry of Finance. (1995-1999)<br>• Head of Section for Actuarial Calculation at the Sub-Directorate of Employer Pension Funds, Directorate of Pension Funds, Directorate General of Financial Institutions, Ministry of Finance. (1993-1995)<br>• Head of Section for Various Industries at the Directorate of Investment, Directorate of Domestic Monetary Funds, Ministry of Finance. (1985-1987)<br>• Head of Section for Administration and Supervision of Loan Forwarding at the Directorate of Investment, Directorate of Domestic Monetary Funds, Ministry of Finance. (1984-1985) |
| **Hubungan Afiliasi**<br>Affiliation | Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.<br>Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders. |

**Luqyan Tamanni**
Dewan Pengawas UUS
UUS Supervisory Board

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|---|---|
| **Kewarganegaraan**<br>**Citizenship** | Indonesia |
| **Domisili**<br>**Domicile** | Bogor |
| **Usia**<br>**Age** | 52 tahun I years old |
| **Dasar Hukum Pengangkatan Jabatan**<br>**Legal Basis for Appointment to Position** | Akta Pernyataan Keputusan Sirkuler Para Pemegang Saham di Luar RUPSLB no. 2458 tanggal 30 Januari 2023<br>Deed of Circular Resolution Statement of Shareholders Outside of EGMS No. 2458 dated January 30, 2023 |
| **Dasar Hukum Pengangkatan Anggota Komite**<br>**Legal Basis for Appointment of Committee Members** | Memorandum No. 032/2024/DIRUT-EU tanggal 6 Desember 2024 tentang Susunan Keanggotaan Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas.<br>Memorandum No. 032/2024/DIRUT-EU dated December 6, 2024 concerning the Composition of Membership of the Integrated Governance Committee of the Sinar Mas Financial Conglomerate. |
| **Riwayat Pendidikan**<br>**Education History** | • PhD in Finance – Januari 2017, University of Glasgow, United Kingdom<br>• Master of Economics – September 2002, University of Malaya, Kuala Lumpur, Malaysia<br>• Bachelor of Economics – November 1997, International Islamic University Malaysia, Kuala Lumpur<br>• PhD in Finance – January 2017, University of Glasgow, United Kingdom<br>• Master of Economics – September 2002, University of Malaya, Kuala Lumpur, Malaysia<br>• Bachelor of Economics – November 1997, International Islamic University Malaysia, Kuala Lumpur |

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|---|---|
| **Riwayat Pekerjaan**<br>Employment History | • Anggota Dewan Pengawas Syariah (DPS)<br>- PT Asuransi Sinar Mas (2017 – sekarang)<br>- PT Sinarmas Multifinance (2017 – sekarang)<br>- PT Reasuransi Nusantara Makmur (2020 – sekarang)<br>• Dosen Tetap - Institut Agama Islam Tazkia, Bogor (2002 – sekarang)<br>• Dosen - Bahrain Institute of Banking and Finance (BIBF)- Bangor University Degree Program in Bahrain (2018 – 2019)<br>• Graduate Teaching Assistant - University of Glasgow, United Kingdom (Teaching & Bloomberg Lab Instructor) (2014 – 2017)<br>• Independent Consultant (2011– 2019)<br>- Bappenas/KNKS<br>(Masterplan Ekonomi Syariah) – melalui PT Zahir Syariah Indonesia (2018)<br>- Bank NTB Syariah<br>Konversi Bank NTB menjadi Bank NTB Syariah – tim konsultan Batasa Tazkia (2017-2018)<br>- Bank Aceh<br>o Menyusun 'Corporate Plan 2018-2022' (Agu – Des 2017)<br>o Menyusun Road Map Unit Usaha Syariah 2011-2016 (Sep 2011)<br>o Islamic Development Bank, Jeddah, Saudi Arabia (Jun 2012)<br>o Islamic Relief Worldwide, UK (Nov. 2012 – July 2014)<br>o Islamic Finance Council UK, Glasgow, UK (Des. 2013 – Jun. 2014)<br>• Direktur Riset – PT Batasa Tazkia Consulting, Jakarta, Indonesia (2010 – 2011)<br>• Associate Operations Officer - International Finance Corporation (IFC), World Bank Group, Indonesia (2006 – 2010)<br>• Member of the Sharia Supervisory Board (SSB)<br>- PT Asuransi Sinar Mas (2017 – present)<br>- PT Sinarmas Multifinance (2017 – present)<br>- PT Reasuransi Nusantara Makmur (2020 – present)<br>• Permanent Lecturer - Tazkia Islamic Institute, Bogor (2002 – present)<br>• Lecturer - Bahrain Institute of Banking and Finance (BIBF)- Bangor University Degree Program in Bahrain (2018 – 2019)<br>• Graduate Teaching Assistant - University of Glasgow, United Kingdom (Teaching & Bloomberg Lab Instructor) (2014 – 2017)<br>• Independent Consultant (2011– 2019)<br>- Bappenas/KNKS<br>(Sharia Economic Masterplan) – through PT Zahir Syariah Indonesia (2018)<br>- Bank NTB Syariah<br>Conversion of Bank NTB to Bank NTB Syariah – Batasa Tazkia consultant team (2017-2018)<br>- Bank Aceh<br>o Prepared 'Corporate Plan 2018-2022' (Aug – Dec 2017)<br>o Prepared Sharia Business Unit Road Map 2011-2016 (Sep 2011)<br>o Islamic Development Bank, Jeddah, Saudi Arabia (Jun 2012)<br>o Islamic Relief Worldwide, UK (Nov. 2012 – July 2014)<br>o Islamic Finance Council UK, Glasgow, UK (Dec. 2013 – Jun. 2014)<br>• Research Director – PT Batasa Tazkia Consulting, Jakarta, Indonesia (2010 – 2011)<br>• Associate Operations Officer - International Finance Corporation (IFC), World Bank Group, Indonesia (2006 – 2010) |
| **Hubungan Afiliasi**<br>Affiliation | Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.<br>Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders. |

**PT AB Sinar Mas Multifinance**

**Herry Hermana**
Komisaris Independen
Independent Commissioner

| | |
|---|---|
| **Kewarganegaraan**<br>Citizenship | Indonesia |
| **Domisili**<br>Domicile | Jakarta |
| **Usia**<br>Age | 68 tahun \| years old |

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|---|---|
| **Dasar Hukum Pengangkatan Jabatan**<br>**Legal Basis for Appointment to Position** | Akta Pernyataan Keputusan Para Pemegang Saham No.892 tanggal 19 Oktober 2021 - PT AB Sinar Mas Multifinance<br>Deed of Statement of Shareholders' Resolutions No. 892 dated October 19, 2021 - PT AB Sinar Mas Multifinance |
| **Dasar Hukum Pengangkatan Anggota Komite**<br>**Legal Basis for Appointment of Committee Members** | Memorandum No. 032/2024/DIRUT-EU tanggal 6 Desember 2024 tentang Susunan Keanggotaan Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas.<br>Memorandum No. 032/2024/DIRUT-EU dated December 6, 2024 concerning the Composition of Membership of the Integrated Governance Committee of the Sinar Mas Financial Conglomerate. |
| **Riwayat Pendidikan**<br>**Education History** | • Sarjana Ekonomi Universitas Kertanegara (1998-2003)<br>• Akademi Bank Pembangunan Jakarta (1976-1980)<br>• Bachelor of Economics, Universitas Kertanegara (1998-2003)<br>• Jakarta Development Bank Academy (1976-1980) |
| **Riwayat Pekerjaan**<br>**Employment History** | • Komisaris Independen PT Sinar Mas Hana Finance ( 2017-sekarang)<br>• Komisaris Independen PT AB Sinar Mas Multifinance ( 2017-sekarang)<br>• *HR Head* PT Sinar Mas Multifinance (1996-2013);<br>• *Accounting & Tax* PT Sinar Mas Multiartha (1989-1996)<br>• *Accounting* PT Internas Artha Leasing Co (1984-1985)<br>• *Officer* PT Bank Internasional Indonesia (1981-1985)<br>• *Trainer* PT Bank Internasional Indonesia (1983-1984)<br>• Staff PT Bank Internasional Indonesia (1981-1983)<br>• Independent Commissioner of PT Sinar Mas Hana Finance (2017-present)<br>• Independent Commissioner of PT AB Sinar Mas Multifinance (2017-present)<br>• HR Head of PT Sinar Mas Multifinance (1996-2013);<br>• Accounting & Tax PT Sinar Mas Multiartha (1989-1996)<br>• Accounting PT Internas Artha Leasing Co (1984-1985)<br>• Officer PT Bank Internasional Indonesia (1981-1985)<br>• Trainer PT Bank Internasional Indonesia (1983-1984)<br>• Staff PT Bank Internasional Indonesia (1981-1983) |
| **Hubungan Afiliasi**<br>**Affiliation** | Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.<br>Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders. |

| **PT. Bank Sinarmas Tbk.** | |
|---|---|
| **Reynold M. Batubara**<br>Pihak Independen<br>Independent Party | |
| **Dasar Hukum Pengangkatan Jabatan**<br>**Legal Basis for Appointment to Position** | Memo M.002/2022/DIRUT-EU tanggal 11 Februari 2022 perihal Penunjukan Pihak Independen Bank Sinarmas sebagai Anggota Komite Tata Kelola Terintegrasi Bagi Konglomerasi Keuangan Sinar Mas.<br>Memo M.002/2022/DIRUT-EU dated 11 February 2022 regarding the Appointment of Independent Party of Bank Sinarmas as Member of the Integrated Governance Committee for the Sinar Mas Financial Conglomerate. |
| **Dasar Hukum Pengangkatan Anggota Komite**<br>**Legal Basis for Appointment of Committee Members** | Memorandum No. 032/2024/DIRUT-EU tanggal 6 Desember 2024 tentang Susunan Keanggotaan Komite Tata Kelola Terintegrasi Konglomerasi Keuangan Sinar Mas.<br>Memorandum No. 032/2024/DIRUT-EU dated 6 December 2024 regarding the Composition of Membership of the Integrated Governance Committee of the Sinar Mas Financial Conglomerate. |

## Hubungan Afiliasi Komite Tata Kelola Terintegrasi
### Integrated Governance Committee Affiliate Relationships

| Nama<br>Name | Jabatan<br>Position | Hubungan Keluarga dengan<br>Familial Relationhsip with | | | | | | Hubungan Keuangan dengan<br>Financial Relationship with | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Dewan Komisaris<br>Board of Commissioner | | Direksi<br>Board of Directors | | Pemegang Saham Pengendali<br>Controlling Shareholder | | Dewan Komisaris<br>Board of Commissioner | | Direksi<br>Board of Directors | | Pemegang Saham Pengendali<br>Controlling Shareholder | |
| | | Ya<br>Yes | Tidak<br>No | Ya<br>Yes | Tidak<br>No | Ya<br>Yes | Tidak<br>No | Ya<br>Yes | Tidak<br>No | Ya<br>Yes | Tidak<br>No | Ya<br>Yes | Tidak<br>No |
| Sammy Kristamuljana | Komisaris Independen (Ketua merangkap Anggota)<br>Independent Commissioner (Chairman and Member) | - | √ | - | √ | - | √ | - | √ | - | √ | - | √ |
| Ahmadi Sukarno | Dewan Pengawas UUS<br>UUS Supervisory Board | - | √ | - | √ | - | √ | - | √ | - | √ | - | √ |
| Mochammad Bukhori Muslim | Dewan Pengawas UUS<br>UUS Supervisory Board | - | √ | - | √ | - | √ | - | √ | - | √ | - | √ |
| Muhammad Faisal Muchtar | Dewan Pengawas UUS<br>UUS Supervisory Board | - | √ | - | √ | - | √ | - | √ | - | √ | - | √ |
| H. Ahmad Nuryadi Asmawi | Dewan Pengawas UUS<br>UUS Supervisory Board | - | √ | - | √ | - | √ | - | √ | - | √ | - | √ |
| Luqyan Tamanni | Dewan Pengawas UUS<br>UUS Supervisory Board | - | √ | - | √ | - | √ | - | √ | - | √ | - | √ |
| Muhammad Fahri Farid | Dewan Pengawas UUS<br>UUS Supervisory Board | - | √ | - | √ | - | √ | - | √ | - | √ | - | √ |
| Tonny Latidjan | Komisaris Independen<br>Independent Commissioner | - | √ | - | √ | - | √ | - | √ | - | √ | - | √ |
| Johanes Chandra Setiawan | Komisaris Independen<br>Independent Commissioner | - | √ | - | √ | - | √ | - | √ | - | √ | - | √ |
| Aditiawan Chandra | Komisaris Independen<br>Independent Commissioner | - | √ | - | √ | - | √ | - | √ | - | √ | - | √ |
| Rohana Sumihar | Komisaris Independen<br>Independent Commissioner | - | √ | - | √ | - | √ | - | √ | - | √ | - | √ |
| Horas Parsaulian Pardede | Komisaris Independen<br>Independent Commissioner | - | √ | - | √ | - | √ | - | √ | - | √ | - | √ |
| Mohammad Shaifie Zein | Komisaris Independen<br>Independent Commissioner | - | √ | - | √ | - | √ | - | √ | - | √ | - | √ |
| Sungkana | Komisaris Independen<br>Independent Commissioner | - | √ | - | √ | - | √ | - | √ | - | √ | - | √ |
| Irawan Chandra | Komisaris Independen<br>Independent Commissioner | - | √ | - | √ | - | √ | - | √ | - | √ | - | √ |
| Mulabasa Hutabarat | Komisaris Independen<br>Independent Commissioner | - | √ | - | √ | - | √ | - | √ | - | √ | - | √ |
| Herry Hermana | Komisaris Independen<br>Independent Commissioner | - | √ | - | √ | - | √ | - | √ | - | √ | - | √ |
| Reynold M Batubara | Pihak Independen<br>Independent Party | - | √ | - | √ | - | √ | - | √ | - | √ | - | √ |

## Wewenang Komite Tata Kelola Terintegrasi

Wewenang Komite Tata Kelola Terintegrasi diungkapkan sebagai berikut.

1. Melakukan pengawasan dan evaluasi atas pelaksanaan Tata Kelola Terintegrasi pada Konglomerasi Keuangan Sinar Mas, paling sedikit melalui penilaian kecukupan pengendalian intern dan pelaksanaan fungsi kepatuhan secara terintegrasi.

   Dalam melakukan evaluasi, Komite Tata Kelola Terintegrasi memperoleh informasi berupa hasil evaluasi atas pelaksanaan audit intern dan fungsi kepatuhan masing-masing LJK dari anggota Dewan Komisaris masing-masing LJK yang menjadi anggota pada Komite Tata Kelola Terintegrasi.

2. Memberikan rekomendasi kepada Dewan Komisaris Entitas Utama untuk penyempurnaan Pedoman Tata Kelola Terintegrasi.

## Rapat Komite Tata Kelola Terintegrasi

Rapat Komite Tata Kelola Terintegrasi wajib diselenggarakan paling sedikit 1 kali setiap semester serta dapat dilaksanakan melalui *video conference*. Sepanjang tahun 2024, Komite ini menyelenggarakan 2 (dua) kali rapat, dengan tingkat kehadiran sebagai berikut.

## Authority of the Integrated Governance Committee

The authority of the Integrated Governance Committee is disclosed as follows.

1. Conduct supervision and evaluation of the implementation of Integrated Governance at the Sinar Mas Financial Conglomerate, at least through an assessment of the adequacy of internal control and the implementation of integrated compliance functions.

   In conducting the evaluation, the Integrated Governance Committee obtains information in the form of evaluation results on the implementation of internal audits and compliance functions of each LJK from members of the Board of Commissioners of each LJK who are members of the Integrated Governance Committee.

2. Provide recommendations to the Board of Commissioners of the Main Entity for the improvement of the Integrated Governance Guidelines.

## Integrated Governance Committee Meeting

The Integrated Governance Committee is required to convene at least once every semester, with meetings permitted to be conducted via video conference. In 2024, the Committee held two meetings, with attendance levels as detailed below.

| Nama<br>Name | Jabatan<br>Position | Jumlah Rapat<br>Number of Meetings | Jumlah Kehadiran<br>Number of Attendance | Tingkat Kehadiran (%)<br>Attendance Rate (%) | Keterangan<br>Description |
|---|---|---|---|---|---|
| Sammy Kristamuljana | Komisaris Independen (Ketua merangkap Anggota)<br>Independent Commissioner (Chairman and Member) | 2 | 2 | 100 | Hadir<br>Attended |
| Ahmadi Sukarno. LC.M.A | Dewan Pengawas Syariah<br>Sharia Supervisory Board | 2 | 2 | 100 | Hadir<br>Attended |
| Mochammad Bukhori Muslim | Dewan Pengawas Syariah<br>Sharia Supervisory Board | 2 | 1 | 50 | Menghadiri rapat Semester II 2024<br>Attended the 2024 Semester II meeting |
| Muhammad Faisal Muchtar | Dewan Pengawas UUS<br>UUS Supervisory Board | 2 | 2 | 100 | Hadir<br>Attended |
| H. Ahmad Nuryadi Asmawi | Dewan Pengawas UUS<br>UUS Supervisory Board | 2 | 2 | 100 | Hadir<br>Attended |
| Luqyan Tamanni | Dewan Pengawas UUS<br>UUS Supervisory Board | 2 | 1 | 50 | Menghadiri rapat Semester II 2024<br>Attended the 2024 Semester II meeting |
| Muhammad Fahri Farid | Dewan Pengawas UUS<br>UUS Supervisory Board | 2 | 0 | 0 | Tidak Hadir<br>Absent |
| Horas Parsaulian Pardede | Komisaris Independen<br>Independent Commissioner | 2 | 2 | 100 | Hadir<br>Attended |
| Tonny Latidjan | Komisaris Independen<br>Independent Commissioner | 2 | 2 | 100 | Hadir<br>Attended |
| J. Chandra Setiawan Puspito | Komisaris Independen<br>Independent Commissioner | 2 | 2 | 100 | Hadir<br>Attended |
| Aditiawan Chandra | Komisaris Independen<br>Independent Commissioner | 2 | 1 | 50 | Menghadiri rapat Semester II 2024<br>Attended the 2024 Semester II meeting |
| Rohana Sumihar | Komisaris Independen<br>Independent Commissioner | 2 | 2 | 100 | Hadir<br>Attended |
| Mohammad Shaifie Zein | Komisaris Independen<br>Independent Commissioner | 2 | 1 | 50 | Menghadiri rapat Semester II 2024<br>Attended the 2024 Semester II meeting |

| Nama<br>Name | Jabatan<br>Position | Jumlah Rapat<br>Number of Meetings | Jumlah Kehadiran<br>Number of Attendance | Tingkat Kehadiran (%)<br>Attendance Rate (%) | Keterangan<br>Description |
|---|---|---|---|---|---|
| Sungkana | Komisaris Independen<br>Independent Commissioner | 2 | 1 | 50 | Menghadiri rapat Semester II 2024<br>Attended the 2024 Semester II meeting |
| Irawan Chandra | Komisaris Independen<br>Independent Commissioner | 2 | 1 | 50 | Menghadiri rapat Semester II 2024<br>Attended the 2024 Semester II meeting |
| Mulabasa Hutabarat | Komisaris Independen<br>Independent Commissioner | 2 | 2 | 100 | Hadir<br>Attended |
| Herry Hermana | Komisaris Independen<br>Independent Commissioner | 2 | 1 | 50 | Menghadiri rapat Semester II 2024<br>Attended the 2024 Semester II meeting |
| Reynold M Batubara | Pihak Independen<br>Independent Party | 2 | 2 | 100 | Hadir<br>Attended |

Informasi mengenai pelaksanaan Rapat Komite Tata Kelola Terintegrasi, mulai dari tanggal dan agenda, diungkapkan pada tabel berikut.

Information regarding the implementation of the Integrated Governance Committee Meeting, starting from the date and agenda, is disclosed in the following table.

| Tanggal<br>Date | Agenda |
|---|---|
| 21 Juni 2024<br>June 21, 2024 | • Pemberitahuan Perubahan Anggota Konglomerasi Keuangan Sinar Mas.<br>• Update Informasi atas rasio-rasio mandatori yang perlu ditindaklanjuti pada PT Sinarmas Multifinance dan PT Bank Nano Syariah.<br>• Pemaparan Rancangan Peraturan Otoritas Jasa Keuangan Konglomerasi Keuangan dan Perusahaan Induk Konglomerasi Keuangan (PIKK).<br>• Update Aktivitas APU PPT & PPPSPM Konglomerasi Keuangan Sinar Mas<br>• Notification of Changes in Members of the Sinar Mas Financial Conglomerate.<br>• Information Update on mandatory ratios that need to be followed up on at PT Sinarmas Multifinance and PT Bank Nano Syariah.<br>• Presentation of the Draft Regulation of the Financial Services Authority for Financial Conglomerates and the Holding Company of Financial Conglomerates (PIKK).<br>• Update on APU PPT & PPPSPM Activities of the Sinar Mas Financial Conglomerate |
| 19 Desember 2024<br>December 19, 2024 | • Sharing Penerapan Strategi Anti Fraud pada PT. Bank Sinarmas Tbk.<br>• Informasi Penambahan Anggota Konglomerasi Keuangan Sinar Mas<br>• Update Aktivitas dan Isu Kepatuhan pada LJK Konglomerasi Keuangan Sinar Mas<br>• Hasil Assessment Penerapan Program APU PPT & PPPSPM LJK Konglomerasi Keuangan Sinar Mas<br>• Sharing of the Implementation of Anti-Fraud Strategies at PT. Bank Sinarmas Tbk.<br>• Information on the Addition of Members of the Sinar Mas Financial Conglomerate<br>• Update on Activities and Compliance Issues at the Sinar Mas Financial Conglomerate LJK<br>• Assessment Results for the Implementation of the APU PPT & PPPSPM Programs of the Sinar Mas Financial Conglomerate LJK |

## Laporan Pelaksanaan Tugas Komite Tata Kelola Terintegrasi

Tugas dan tanggung jawab yang telah dilaksanakan Komite Tata Kelola Terintegrasi di sepanjang tahun 2024, yakni:

1. Komite Tata Kelola Terintegrasi telah melakukan evaluasi atas pelaksanaan Tata Kelola Terintegrasi, paling sedikit melalui penilaian kecukupan pengendalian intern dan pelaksanaan fungsi Kepatuhan secara terintegrasi melalui Rapat Komite Tata Kelola Terintegrasi.
2. Komite Tata Kelola Terintegrasi telah memberikan rekomendasi kepada Dewan Komisaris Entitas Utama untuk penyempurnaan Pedoman Tata Kelola Terintegrasi yang tertuang pada Surat Keputusan Nomor SK.001/2021/DIRUT-EU tanggal 27 Januari.
3. Hasil rapat Komite Tata Kelola Terintegrasi semester I dan semester II tahun 2024 telah dituangkan dalam risalah rapat dan didokumentasikan dengan baik serta tidak terdapat dissenting opinions.

## Report on the Implementation of Integrated Governance Committee Duties

The duties and responsibilities that have been carried out by the Integrated Governance Committee throughout 2024, namely:

1. The Integrated Governance Committee has conducted an evaluation of the implementation of Integrated Governance, at least through an assessment of the adequacy of internal control and the implementation of the Compliance function in an integrated manner through the Integrated Governance Committee Meeting.
2. The Integrated Governance Committee has provided recommendations to the Board of Commissioners of the Main Entity for the improvement of the Integrated Governance Guidelines as stated in Decree Number SK.001/2021/DIRUT-EU dated January 27.
3. The results of the Integrated Governance Committee meetings for semester I and semester II of 2024 have been stated in the minutes of the meeting and are well documented and there are no dissenting opinions.

# KOMITE-KOMITE DI BAWAH DIREKSI
## Committees Under the Board of Directors



### KOMITE MANAJEMEN RISIKO

Komite Manajemen Risiko (*Risk Management Committee*-RMC) adalah komite yang beranggotakan Direksi serta Pejabat Eksekutif Bank yang bersifat sebagai anggota tetap dan anggota tidak tetap yang disesuaikan dengan kebutuhan dan Bank. Komite tersebut dibentuk untuk membantu pelaksanaan tugas dan wewenang Direksi terkait dengan penerapan manajemen risiko di Bank. Komite Manajemen Risiko bersifat independen dalam menjalankan tugas dan tanggung jawabnya.

#### Pedoman Kerja

Komite Manajemen Risiko menjalankan tugas tanggung jawabnya dengan berpedoman pada Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum dan Surat Keputusan No. SK.095/2023/DIR1-RMG tanggal 28 Desember 2023 tentang Pedoman dan Tata Tertib Kerja Komite Manajemen Risiko PT. Bank Sinarmas Tbk.

#### Struktur dan Komposisi

Struktur dan komposisi Komite Manajemen Risiko Bank Sinarmas berdasarkan Surat Keputusan No. SK.095/2023/DIR1-RMG tanggal 28 Desember 2023 tentang Pedoman dan Tata Tertib Kerja Komite Manajemen Risiko PT. Bank Sinarmas Tbk. diungkapkan sebagai berikut.

### RISK MANAGEMENT COMMITTEE

The Risk Management Committee (RMC) is a committee consisting of the Board of Directors and Executive Officers of the Bank who act as permanent and non-permanent members adjusted to the needs and the Bank. The committee was formed to assist in the implementation of the duties and authorities of the Board of Directors related to the implementation of risk management in the Bank. The Risk Management Committee is independent in carrying out its duties and responsibilities.

#### Work Guidelines

The Risk Management Committee carries out its duties and responsibilities by referring to the Financial Services Authority Regulation No. 18/POJK.03/2016 concerning the Implementation of Risk Management for Commercial Banks and Decree No. SK.095/2023/DIR1-RMG dated December 28, 2023 concerning the Guidelines and Work Procedures of the Risk Management Committee of PT. Bank Sinarmas Tbk.

#### Structure and Composition

The structure and composition of the Risk Management Committee of Bank Sinarmas based on Decree No. SK.095/2023/DIR1-RMG dated December 28, 2023 concerning the Guidelines and Work Procedures of the Risk Management Committee of PT. Bank Sinarmas Tbk. is disclosed as follows.

| Jabatan dalam Komite<br>Positions in the Committee | Pelaksana<br>Organizer | Hak Suara<br>Voting Right |
|---|---|---|
| Ketua (Anggota Tetap)<br>Chairman (Permanent Member) | *Compliance & Risk Management Director* | √ |
| Sekretaris Komite (Anggota Tetap)<br>Committee Secretary (Permanent Member) | *Risk Management Group Head* | √ |
| Anggota Tetap<br>Permanent Member | Seluruh Direktur<br>All Director | √ |
| Anggota Tidak Tetap<br>Non-Permanent Member | Bidang Risiko<br>Risk Sector | x |
| | Bidang Audit Internal<br>Internal Audit Sector | x |
| | Bidang *Compliance*<br>Compliance Sector | x |
| | Bidang *Legal*<br>Legal Sector | x |
| | Bidang Perkreditan/*Lending*<br>Credit/Lending Sector | x |
| | Bidang *Treasury & Financial Institution*<br>Treasury & Financial Institution Sector | x |

| Jabatan dalam Komite<br>Positions in the Committee | Pelaksana<br>Organizer | Hak Suara<br>Voting Right |
|---|---|---|
| | Bidang *Payment & Transaction*<br>Payment & Transaction Sector | x |
| | Bidang *Operations*<br>Operations Sector | x |
| | Bidang Dana Pihak Ketiga/*Liability*<br>Third Party Funds/Liability Sector | x |
| | Bidang *Information Technology*<br>Information Technology Sector | x |
| | Bidang *Securities Services*<br>Securities Services Sector | x |
| | Bidang *Finance & Performance Management*<br>*Finance & Performance Management Sector* | x |
| | Bidang *Human Capital*<br>Human Capital Sector | x |
| | Bidang *Digital Banking*<br>Digital Banking Sector | x |
| | Bidang *Sales and Distribution*<br>Sales and Distribution Sector | x |

## Tugas dan Tanggung Jawab

Komite Manajemen Risiko memiliki tugas dan tanggung jawab memberikan rekomendasi kepada Direktur Utama terkait penerapan manajemen risiko berupa proses identifikasi, pengukuran, pemantauan, pengendalian dan sistem informasi manajemen yang paling sedikit mencakup:

1. Penyusunan kebijakan, strategi, dan pedoman penerapan manajemen risiko serta perubahannya, termasuk strategi manajemen risiko, tingkat risiko yang diambil dan toleransi risiko, kerangka manajemen risiko, serta rencana kontinjensi untuk mengantisipasi terjadinya kondisi tidak normal;
2. Perbaikan atau penyempurnaan pelaksanaan manajemen risiko secara berkala maupun bersifat insidental sebagai akibat dari suatu perubahan kondisi eksternal dan internal Bank yang memengaruhi kecukupan permodalan, profil risiko Bank, dan tidak efektifnya penerapan manajemen risiko berdasarkan hasil evaluasi;
3. Penetapan kebijakan dan/atau keputusan bisnis yang menyimpang dari prosedur normal, seperti pelampauan ekspansi usaha yang signifikan dibandingkan dengan rencana bisnis Bank yang telah ditetapkan sebelumnya atau pengambilan posisi/eksposur risiko yang melampaui limit yang telah ditetapkan yang dapat disampaikan melalui rapat Komite Manajemen Risiko atau dilakukan melalui sirkulasi memorandum internal;
4. Menyetujui Laporan Tingkat Kesehatan Bank, yang meliputi Laporan Profil Risiko Bank (yang mencakup 8 (delapan) jenis risiko, yaitu risiko kredit, risiko pasar, risiko likuiditas, risiko stratejik, risiko operasional termasuk risiko siber sebagai indikator tambahan, risiko kepatuhan, risiko reputasi, dan risiko hukum, serta terdapat tambahan 2 risiko terkait syariah, yaitu risiko investasi dan risiko imbal hasil), Laporan Tata Kelola Bank, Laporan Rentabilitas Bank, serta Laporan Permodalan Bank yang wajib disampaikan secara berkala kepada regulator, yaitu triwulan dan semesteran, yang disampaikan dan disetujui melalui rapat Komite Manajemen Risiko;

## Duties and Responsibilities

The Risk Management Committee is responsible for providing recommendations to the President Director regarding the implementation of risk management, including the processes of identification, measurement, monitoring, control, and management information systems, covering at least the following:

1. Formulating risk management policies, strategies, and implementation guidelines, including any revisions. This includes the risk management strategy, risk appetite and tolerance, risk management framework, and contingency plans to anticipate abnormal conditions;
2. Improving or refining risk management implementation on a regular basis or incidentally due to changes in the Bank's internal or external conditions that affect capital adequacy, risk profile, or the ineffectiveness of risk management implementation based on evaluation results;
3. Approving policies and/or business decisions that deviate from standard procedures, such as significant business expansion beyond the previously established business plan or risk-taking/position exposure that exceeds the established limits. Such approvals may be granted through Risk Management Committee meetings or by internal memorandum circulation;
4. Approving the Bank Soundness Level Report, which includes the Bank's Risk Profile Report (covering 8 types of risk: credit, market, liquidity, strategic, operational—including cyber risk as an additional indicator—compliance, reputation, and legal risk, as well as 2 sharia-specific risks: investment risk and return risk), Governance Report, Bank Profitability Report, and Capital Report, which must be periodically submitted to regulators on a quarterly and semiannual basis through Risk Management Committee meetings;

5. Menyetujui laporan lain yang wajib dilaporkan kepada regulator secara berkala, seperti Laporan *Internal Capital Adequacy Assesment Process* (ICAAP), Laporan Stress Test, dan lain-lain yang dapat disampaikan dan disetujui melalui rapat Komite Manajemen Risiko atau melalui sirkulasi memorandum internal;
6. Menjalankan fungsi yang lain, seperti yang diarahkan oleh Presiden Direktur dan/atau Komite Pemantau Risiko; serta
7. Menyetujui rencana kerja yang disusun dan disampaikan oleh Sekretaris Komite Manajemen Risiko.

## Rapat

### Kebijakan

Komite Manajemen Risiko mengadakan rapat minimal 10 kali dalam setahun dan rapat *Ad hoc* di luar rapat berkala. Rapat komite dihadiri oleh seluruh anggota tetap dan anggota tidak tetap.

### Frekuensi dan Kehadiran

Selama tahun 2024, Komite Manajemen Risiko telah menyelenggarakan rapat secara berkala sebanyak 11 kali rapat dan seluruh hasil rapat yang dilaksanakan telah mencapai keputusan bersama secara musyawarah dan mufakat serta dinyatakan sah dan seluruh hasil rapat Komite Manajemen Risiko dituangkan di dalam risalah rapat dan telah didokumentasikan dengan baik.

5. Approving other reports that must be regularly submitted to regulators, such as the Internal Capital Adequacy Assessment Process (ICAAP) Report, Stress Test Report, and others, which may be approved via Committee meetings or internal memorandum circulation;
6. Carrying out other functions as directed by the President Director and/or the Risk Monitoring Committee; and
7. Approving work plans prepared and submitted by the Secretary of the Risk Management Committee.

## Meetings

### Policy

The Risk Management Committee is required to hold a minimum of 10 meetings annually, in addition to ad hoc meetings outside the regular schedule. Each meeting must be attended by all permanent and non-permanent members.

### Frequency and Attendance

In 2024, the Risk Management Committee convened 11 regular meetings. All meetings reached consensus-based decisions, and and were declared valid, with all outcomes of the Risk Management Committee meetings duly recorded in the minutes and properly documented.

| Jabatan<br>Position | Jumlah Rapat<br>Number of Meetings | Jumlah Kehadiran<br>Number of Attendance | Frekuensi/Tingkat Kehadiran (%)<br>Frequency/Attendance Rate (%) |
|---|---|---|---|
| Direktur yang *Compliance & Risk Management*<br>Compliance & Risk Management Director | 11 | 11 | 100,00 |
| Satuan Kerja Manajemen Risiko<br>Risk Management Work Unit | 11 | 11 | 100,00 |
| Seluruh Direktur<br>All Directors | 11 | 11 | 100,00 |
| Bidang Audit Internal<br>Internal Audit Department | 11 | 10 | 90,91 |
| Bidang *Compliance*<br>Compliance Department | 11 | 8 | 72,73 |
| Bidang *Legal*<br>Legal Department | 11 | 7 | 63,64 |
| Bidang Perkreditan/*Lending*<br>Credit/Lending Department | 11 | 10 | 90,91 |
| Bidang *Treasury & Financial Institution*<br>Treasury & Financial Institution Department | 11 | 1 | 9,09 |
| Bidang *Payment & Transaction*<br>Payment & Transaction Department | 11 | 8 | 72,73 |
| Bidang *Operations*<br>Operations Department | 11 | 9 | 81,82 |
| Bidang Dana Pihak Ketiga/*Liability*<br>Third Party Fund/Liability Department | 11 | 1 | 9,09 |
| Bidang Syariah<br>Sharia Department | 11 | 1 | 9,09 |
| Bidang *Securities Services*<br>Securities Services Department | 11 | 1 | 9,09 |
| Bidang *Finance & Performance Management*<br>Finance & Performance Management Department | 11 | 9 | 81,82 |

| Jabatan<br>Position | Jumlah Rapat<br>Number of Meetings | Jumlah Kehadiran<br>Number of Attendance | Frekuensi/Tingkat Kehadiran (%)<br>Frequency/Attendance Rate (%) |
|---|---|---|---|
| Bidang *Human Capital*<br>Human Capital Department | 11 | 7 | 63,64 |
| Bidang *Product Management*<br>Product Management Department | 11 | 6 | 54,55 |
| Bidang *Sales and Distribution*<br>Sales and Distribution Department | 11 | 0 | 0,00 |
| Bidang *Loan Recovery*<br>Loan Recovery Department | 11 | 8 | 72,73 |
| Bidang Anti-*Fraud*<br>Anti-Fraud Department | 11 | 10 | 90,91 |
| Bidang *Digital Marketing*<br>Digital Marketing Department | 11 | 0 | 0,00 |
| Bidang Deposit, *Investment & Product Development*<br>Deposit, Investment & Product Development Department | 11 | 5 | 45,45 |
| Bidang *Technical Product Management*<br>Technical Product Management Department | 11 | 9 | 81,82 |
| Bidang IT *Infrastructure*<br>IT Infrastructure Department | 11 | 11 | 100,00 |
| Bidang IT *Governance*<br>IT Governance Department | 11 | 8 | 72,73 |
| Bidang *Artificial Intelligence*<br>Artificial Intelligence Department | 11 | 7 | 63,64 |
| Bidang *Business Intelligence*<br>Business Intelligence Department | 11 | 9 | 81,82 |
| Bidang *Credit Management*<br>Credit Management Department | 11 | 7 | 63,64 |
| Bidang *Credit Administration*<br>Credit Administration Department | 11 | 11 | 100,00 |
| Bidang *Credit Card*<br>Credit Department Card | 11 | 8 | 72,73 |
| Bidang *Branch Network*<br>Department Branch Network | 11 | 2 | 18,18 |
| Bidang *Consumer Loan Advisor*<br>Department Consumer Loan Advisor | 11 | 3 | 27,27 |

## Agenda

| Tanggal<br>Date | Agenda |
|---|---|
| 17 Januari 2024<br>January 17, 2024 | 1. Laporan TKB 31 Des 2023.<br>2. Laporan ICAAP 31 Des 2023.<br>3. Laporan *Stress Testing* Bank posisi 31 Des 2023.<br>4. Laporan Profil Risiko Unit Usaha Syariah Bank Sinarmas 31 Des 2023.<br>5. Pemantauan *Risk Appetite & Risk Tolerance* Triwulan IV - 2023.<br>6. Pemantauan Realisasi Rasio RPIM<br>7. Pemantauan dan Pelaporan Restrukturisasi Covid 19 Triwulan IV – Desember 2023<br>1. TKB Report 31 Dec 2023.<br>2. ICAAP Report 31 Dec 2023.<br>3. Bank Stress Testing Report position 31 Dec 2023.<br>4. Bank Sinarmas Sharia Business Unit Risk Profile Report 31 Dec 2023.<br>5. Monitoring of Risk Appetite & Risk Tolerance Quarter IV - 2023.<br>6. Monitoring of RPIM Ratio Realization<br>7. Monitoring and Reporting of Covid 19 Restructuring Quarter IV - December 2023 |
| 28 Februari 2024<br>February 28, 2024 | 1. Proposal Pengajuan *Risk Appetite & Risk Tolerance* RMG Tahun 2024<br>2. Penerapan *Risk Control Self Assessment* (RCSA) *End to end Process* dengan Metode Penyempurnaan.<br>3. Realisasi Rencana Kerja Komite Manajemen Risiko Tahun 2023 dan Proposal Program Kerja Komite Manajemen Risiko Tahun 2024.<br>1. Proposal for Submission of Risk Appetite & Risk Tolerance RMG 2024<br>2. Implementation of Risk Control Self Assessment (RCSA) End to end Process with Improvement Method.<br>3. Realization of Risk Management Committee Work Plan 2023 and Proposal of Risk Management Committee Work Program 2024. |

| Tanggal<br>Date | Agenda |
|---|---|
| 26 Maret 2024<br>March 26, 2024 | 1. Proposal Pengajuan Hasil Kaji Ulang *Peers* Bank Tahun 2024 untuk Penyusunan Laporan Profil Risiko Bank.<br>2. Proposal Kaji Ulang Parameter, *Threshold* dan Bobot Risiko Penilaian Tingkat Kesehatan Bank dan Profil Risiko (Bank dan Konsolidasi).<br>3. Proposal Kaji Ulang Parameter Rentabilitas dalam Laporan Tingkat Kesehatan Bank. (Proposal diajukan oleh Finance Group).<br>4. Simulasi perhitungan Laporan Tingkat Kesehatan Bank dan Laporan Profil Risiko Bank (Konsolidasi & Konvensional) dengan parameter, rentang risiko, bobot risiko terbaru menggunakan Data posisi 31 Desember 2023<br>1. Proposal for Submission of Peers Bank Review Results 2024 for Preparation of Bank Risk Profile Report.<br>2. Proposal for Review of Parameters, Thresholds and Risk Weights for Bank Health Level Assessment and Risk Profile (Bank and Consolidation).<br>3. Proposal for Review of Rentability Parameters in Bank Health Level Report (Proposal submitted by Finance Group).<br>4. Simulation of calculation of Bank Health Level Report and Bank Risk Profile Report (Consolidation & Conventional) with the latest parameters, risk range, risk weights using Data position 31 December 2023 |
| 24 April 2024<br>April 24, 2024 | 1. Laporan Profil Risiko Bank Individu posisi 31 Maret 2024.<br>2. Laporan Profil Risiko Bank Konsolidasi posisi 31 Maret 2024.<br>3. Pemantauan *Risk Appetite & Risk Tolerance* Triwulan I - 2024.<br>4. Pemantauan Realisasi Rasio RPIM.<br>1. Individual Bank Risk Profile Report as of March 31, 2024.<br>2. Consolidated Bank Risk Profile Report as of March 31, 2024.<br>3. Monitoring of Risk Appetite & Risk Tolerance for Quarter I - 2024.<br>4. Monitoring of RPIM Ratio Realization. |
| 26 Juni 2024<br>June 26, 2024 | 1. Update Pemenuhan Sertifikasi Manajemen Risiko (HCM).<br>2. Proposal Persetujuan atas Aspek Penilaian Manajemen Risiko TI (bagian dari Digital Maturity Assesment Bank) Posisi Desember 2023.<br>1. Update on Risk Management Certification (HCM).<br>2. Proposal for Approval of IT Risk Management Assessment Aspects (part of Bank›s Digital Maturity Assessment) Position December 2023. |
| 17 Juli 2024<br>July 17, 2024 | 1. Laporan TKB (Individu & Konsolidasi) posisi 30 Juni 2024.<br>2. Laporan ICAAP (Individu & Konsolidasi) posisi 30 Juni 2024.<br>3. Laporan Stress Testing Bank (Individu & Konsolidasi posisi 30 Juni 2024.<br>4. Laporan Profil Risiko Bank posisi TW IV - 2024 (Individu & Konsolidasi).<br>5. Pemantauan *Risk Appetite & Risk Tolerance*.<br>6. Pemantauan Realisasi Rasio RPIM Triwulan II - 2024.<br>1. TKB Report (Individual & Consolidation) position June 30, 2024.<br>2. ICAAP Report (Individual & Consolidation) position June 30, 2024.<br>3. Bank Stress Testing Report (Individual & Consolidation position June 30, 2024.<br>4. Bank Risk Profile Report position Q4 - 2024 (Individual & Consolidation).<br>5. Risk Appetite & Risk Tolerance Monitoring.<br>6. Monitoring of RPIM Ratio Realization Quarter II - 2024. |
| 24 September 2024<br>September 24, 2024 | 1. Proposal Persetujuan Kaji Ulang *Risk Appetite & Risk Tolerance* Bank Tahun 2024.<br>2. Tindak Lanjut permintaan Komite Pemantauan Risiko mengenai Evaluasi Risiko terkait Transaksi di Treasury untuk Risiko Pasar, Risiko Likuiditas & Risiko Operasional).<br>1. Proposal for Approval of Bank›s Risk Appetite & Risk Tolerance Review in 2024.<br>2. Follow-up to the Risk Monitoring Committee›s request regarding Risk Evaluation related to Transactions in Treasury for Market Risk, Liquidity Risk & Operational Risk). |
| 16 Oktober 2024<br>October 16, 2024 | 1. Laporan Profil Risiko Bank Individu posisi 30 September 2024.<br>2. Laporan Profil Risiko Bank Konsolidasi posisi 30 September 2024.<br>3. Pemantauan *Risk Appetite & Risk Tolerance* Triwulan III - 2024.<br>4. Pemantauan Realisasi Rasio RPIM.<br>1. Individual Bank Risk Profile Report as of September 30, 2024.<br>2. Consolidated Bank Risk Profile Report as of September 30, 2024.<br>3. Monitoring of Risk Appetite & Risk Tolerance Quarter III - 2024.<br>4. Monitoring of RPIM Ratio Realization. |
| 25 November 2024<br>November 25, 2024 | 1. Kaji Ulang Metodologi Perhitungan ICAAP.<br>2. Realisasi Rencana Kerja Komite Manajemen Risiko Tahun 2024 dan Proposal Program Kerja Komite Manajemen Risiko Tahun 2025.<br>1. Review of ICAAP Calculation Methodology.<br>2. Realization of the Risk Management Committee Work Plan for 2024 and the Risk Management Committee Work Program Proposal for 2025. |
| 10 Desember 2024<br>December 10, 2024 | Laporan Rencana Aksi Pemulihan Bank Sinarmas (*Recovery Plan*) Tahun 2024.<br>Report on Bank Sinarmas Recovery Action Plan (Recovery Plan) for 2024 |
| 19 Desember 2024<br>December 19, 2024 | 1. POJK 15 tahun 2024 tentang Integritas Pelaporan Keuangan Bank.<br>2. *Corporate Credit Rating Assessment* Bank Sinarmas.<br>1. POJK 15 of 2024 concerning the Integrity of Bank Financial Reporting.<br>2. Corporate Credit Rating Assessment of Bank Sinarmas. |

## Pelaksanaan Tugas dan Tanggung Jawab Tahun 2024

Sepanjang tahun 2024, Komite Manajemen Risiko Bank Sinarmas telah melaksanakan tugas dan tanggung jawab sebagai berikut.

1. Menyetujui *Risk Appetite & Risk Tolerance* Bank 2024, termasuk Revisi *Risk Appetite & Risk Tolerance* Bank.
2. Menyetujui Penilaian Laporan Profil Risiko Unit Usaha Syariah Posisi Triwulan IV – 2023.
3. Menyetujui Penilaian Laporan Tingkat Kesehatan Bank posisi 31 Desember 2023 & Juni 2024 (Individu & Konsolidasi).
4. Menyetujui Laporan *Internal Capital Adequacy Assessment Process* (ICAAP) Individu & Konsolidasi Posisi Desember 2023 & Juni 2024.
5. Menyetujui kaji ulang parameter, rentang risiko, dan bobot risiko parameter Tingkat Kesehatan Bank & Profil Risiko Bank tahun 2024.
6. Menyetujui Penetapan kebijakan dan/atau keputusan bisnis yang menyimpang dari prosedur normal/limit normal (pelampauan).
7. Melakukan pengawasan dan/atau pemantauan terkait Ketentuan dan Uji *Coba Contingency Funding Plan* dan Pinjaman Likuiditas Jangka Pendek (PLJP) Bank Indonesia tahun 2024.
8. Menyetujui skenario dan hasil *stress testing* Bank 2024.
9. Menyetujui Laporan Rencana Aksi Pemulihan Bank Sinarmas (*Recovery Plan*) Tahun 2024
10. Menyetujui penyempurnaan proses Manajemen Risiko secara berkala maupun bersifat insidental sebagai akibat dari suatu perubahan kondisi eksternal dan internal Bank yang mempengaruhi kecukupan permodalan, Profil Risiko Bank, dan tidak efektifnya penerapan manajemen risiko berdasarkan hasil evaluasi, berupa:
    a. Pemantauan Realisasi Rasio Inklusif Makroprudensial (RPIM);
    b. Penerapan *Risk Control Self Assessment* (RCSA) *End to end Process* dengan Metode Penyempurnaan;
    c. Update Pemenuhan Sertifikasi Manajemen Risiko (HCM);
    d. Proposal Persetujuan atas Aspek Penilaian Manajemen Risiko TI (bagian dari Digital Maturity Assesment Bank) Posisi Desember 2023;
    e. Menyetujui Kaji Ulang Metododologi ICAAP tahun 2024;
    f. Tindak Lanjut permintaan Komite Pemantauan Risiko mengenai Evaluasi Risiko terkait Transaksi di Treasury untuk Risiko Pasar, Risiko Likuiditas & Risiko Operasional;
    g. Realisasi Rencana Kerja Komite Manajemen Risiko Tahun 2024 dan Proposal Program Kerja Komite Manajemen Risiko Tahun 2025; dan
    h. Sosialisasi POJK 15 tahun2024 Tentang Integritas Pelaporan Keuangan Bank;
    i. *Corporate Credit Rating Assessment* Bank Sinarmas.

## Implementation of Duties and Responsibilities in 2024

Throughout 2024, the Risk Management Committee of Bank Sinarmas has carried out the following duties and responsibilities.

1. Approved the Bank's Risk Appetite & Risk Tolerance 2024, including the Revised Bank's Risk Appetite & Risk Tolerance.
2. Approved the Assessment of the Sharia Business Unit Risk Profile Report for Quarter IV - 2023.
3. Approved the Assessment of the Bank's Health Level Report for December 31, 2023 & June 2024 (Individual & Consolidated).
4. Approve the Internal Capital Adequacy Assessment Process (ICAAP) Report for Individual & Consolidated Positions for December 2023 & June 2024.
5. Approve the review of parameters, risk ranges, and risk weights for Bank Health Level & Bank Risk Profile parameters in 2024.
6. Approve the determination of policies and/or business decisions that deviate from normal procedures/normal limits (excesses).
7. Conduct supervision and/or monitoring related to the Provisions and Trial of the Contingency Funding Plan and Short-Term Liquidity Loan (PLJP) of Bank Indonesia in 2024.
8. Approve the scenario and results of the Bank's stress testing in 2024.
9. Approve the Report on the Bank Sinarmas Recovery Action Plan (Recovery Plan) in 2024
10. Approve the improvement of the Risk Management process periodically or incidentally as a result of changes in the Bank's external and internal conditions that affect capital adequacy, the Bank's Risk Profile, and the ineffectiveness of risk management implementation based on evaluation results, in the form of:
    a. Monitoring the Realization of the Macroprudential Inclusive Ratio (RPIM);
    b. Implementation of the End-to-end Risk Control Self Assessment (RCSA) Process with the Improvement Method;
    c. Update on Fulfillment of Risk Management Certification (HCM);
    d. Proposal for Approval of the IT Risk Management Assessment Aspect (part of the Bank's Digital Maturity Assessment) Position in December 2023;
    e. Approving the ICAAP Methodology Review in 2024;
    f. Follow-up on the Risk Monitoring Committee's request regarding the Evaluation of Risks related to Transactions in Treasury for Market Risk, Liquidity Risk & Operational Risk;
    g. Realization of the Risk Management Committee Work Plan in 2024 and the Risk Management Committee Work Program Proposal in 2025; and
    h. Socialization of POJK 15 of 2024 concerning the Integrity of Bank Financial Reporting;
    i. Corporate Credit Rating Assessment of Bank Sinarmas.

## KOMITE KEBIJAKAN PERKREDITAN (KKP)

Komite Kebijakan Perkreditan (KKP) merupakan upaya untuk mendukung pelaksanaan pemberian kredit yang sehat dan pengelolaan kredit yang optimal serta untuk dapat melaksanakan Kebijakan Perkreditan yang telah ditetapkan, diperlukan Perangkat Perkreditan yang disusun sesuai dengan fungsi, tugas, wewenang dan tanggung jawab. Perangkat Perkreditan terdiri dari Dewan Komisaris, Dewan Direksi, dan Satuan Kerja Perkreditan.

Komite Kebijakan Perkreditan (KKP) adalah komite yang membantu direksi dalam merumuskan kebijakan, mengawasi pelaksanaan kebijakan, memantau perkembangan dan kondisi portofolio perkreditan serta memberikan saran-saran langkah perbaikan.

### Pedoman Kerja

Komite Kebijakan Perkreditan (KKP) menjalankan tugas tanggung jawabnya dengan berpedoman pada Pedoman dan Tata Tertib Kerja Komite Kebijakan Perkreditan versi 2.0 dan ketentuan eksternal yang berlaku, antara lain:

1. Undang-Undang Republik Indonesia Nomor 10 Tahun 1998 tentang Perubahan atas Undang-Undang Nomor 7 Tahun 1992 tentang Perbankan;
2. Peraturan Otoritas Jasa Keuangan Nomor 18/POJK.03/2016 tanggal 16 Maret 2016 tentang Penerapan Manajemen Risiko Bagi Bank Umum;
3. Peraturan Otoritas Jasa Keuangan Nomor 42/POJK.03/2017 tentang Kewajiban Penyusunan dan Pelaksanaan Kebijakan Perkreditan Bank Bagi Bank Umum;
4. Peraturan Otoritas Jasa Keuangan Nomor 17/POJK.03/2023 tentang Penerapan Tata Kelola Bagi Bank Umum;
5. Surat Edaran Otoritas Jasa Keuangan Nomor 34/SEOJK.03/2016 tanggal 01 September 2016 tentang Penerapan Manajemen Risiko Bagi Bank Umum (beserta lampiran).

## CREDIT POLICY COMMITTEE

The Credit Policy Committee (KKP) is established to support the implementation of sound credit disbursement practices and the optimal management of credit. In order to implement the established Credit Policy effectively, a Credit Framework is required, structured in accordance with defined functions, duties, authorities, and responsibilities. The Credit Framework consists of the Board of Commissioners, the Board of Directors, and the Credit Work Unit.

The Credit Policy Committee (KKP) is a committee that assists the Board of Directors in formulating credit policies, overseeing their implementation, monitoring the development and condition of the credit portfolio, and providing recommendations for corrective actions.

### Work Guidelines

The Credit Policy Committee (KKP) carries out its duties and responsibilities by referring to the Guidelines and Work Rules of the Credit Policy Committee version 2.0 and applicable external provisions, including:

1. Law of the Republic of Indonesia Number 10 of 1998 concerning Amendments to Law Number 7 of 1992 concerning Banking;
2. Regulation of the Financial Services Authority Number 18/POJK.03/2016 dated March 16, 2016 concerning the Implementation of Risk Management for Commercial Banks;
3. Regulation of the Financial Services Authority Number 42/POJK.03/2017 concerning the Obligation to Prepare and Implement Bank Credit Policies for Commercial Banks;
4. Regulation of the Financial Services Authority Number 17/POJK.03/2023 concerning the Implementation of Governance for Commercial Banks;
5. Circular Letter of the Financial Services Authority Number 34/SEOJK.03/2016 dated 01 September 2016 concerning the Implementation of Risk Management for Commercial Banks (including attachments).

### Struktur dan Komposisi
**Structure and Composition**

| Jabatan dalam Komite<br>Positions in the Committee | Pelaksana<br>Manager | Hak Suara<br>Voting Rights |
|---|---|---|
| Ketua<br>(Merangkap Anggota Tetap)<br>Chairman<br>(Concurrently Permanent Member) | Direktur Utama<br>President Director | √ |
| Sekretaris<br>(Merangkap Anggota Tetap, Tidak Memiliki Hak Voting)<br>Secretary<br>(Concurrently Permanent Member, No Voting Rights) | Risk Management Group Head | X |

| Jabatan dalam Komite<br>Positions in the Committee | Pelaksana<br>Manager | Hak Suara<br>Voting Rights |
|---|---|---|
| Anggota Tetap<br>Permanent Member | 1. Seluruh Direktur yang terdaftar dalam struktur organisasi Bank Sinarmas.<br>2. Internal Audit Group Head.<br><br>Seluruh Anggota Tetap Memiliki Hak Voting, kecuali:<br>1. Direktur yang membawahkan Fungsi Kepatuhan.<br>2. Internal Audit Group Head.<br><br>1. All Directors registered in the organizational structure of Bank Sinarmas.<br>2. Internal Audit Group Head.<br><br>All Permanent Members Have Voting Rights, except:<br>1. Director in charge of Compliance Function.<br>2. Internal Audit Group Head. | √<br><br>X |
| Anggota Tidak Tetap<br>(Tidak Memiliki Hak Voting)<br>Non-Permanent Member<br>(No Voting Rights) | Pejabat Eksekutif operasional terkait perkreditan yang terdaftar dalam struktur organisasi Bank Sinarmas, dengan tidak terbatas pada:<br>1. Micro Small & Medium Enterprise Business Group Head<br>2. Corporate & Commercial Banking Group Head<br>3. Treasury & Financial Institution Group Head<br>4. Payment Transaction & Consumer Loan Group Head<br>5. Credit Card Group Head<br>6. Indirect Channel Business and Collateral Valuation Division Head<br>7. Credit Management Group Head (Corporate & Commercial)<br>8. Credit Management Group Head (MSME & Consumer)<br>9. Compliance Group Head<br>10. Credit Administration and Control Group Head<br>11. Loan Recovery Group Head<br>12. Legal Group Head<br>Operational Executive Officers related to credit registered in the organizational structure of Bank Sinarmas, without limitation:<br>1. Micro Small & Medium Enterprise Business GroupHead<br>2. Corporate & Commercial Banking Group Head<br>3. Treasury & Financial Institution Group Head<br>4. Payment Transaction & Consumer Loan GroupHead<br>5. Credit Card Group Head<br>6. Indirect Channel Business and CollateralValuation Division Head<br>7. Credit Management Group Head (Corporate & Commercial)<br>8. Credit Management Group Head (MSME & Consumer)<br>9. Compliance Group Head<br>10. Credit Administration and Control Group Head<br>11. Loan Recovery Group Head<br>12. Legal Group Head | X |

## Pernyataan Independensi

Bank menjamin bahwa seluruh anggota Komite Kebijakan Perkreditan (KKP) bertindak secara independen dan tidak menerima/melakukan intervensi dari/kepada pihak lainnya. Komite Kebijakan Perkreditan (KKP) juga tidak memiliki kepentingan serta keterkaitan yang bersifat pribadi yang berpotensi menimbulkan benturan kepentingan (*conflict of interest*) dengan Bank.

## Independence Statement

The Bank guarantees that all members of the Credit Policy Committee (KKP) act independently and do not accept/conduct intervention from/to other parties. The Credit Policy Committee (KKP) also does not have any personal interests or relationships that have the potential to cause a conflict of interest with the Bank.

## Tugas dan Tanggung Jawab

Tugas, Wewenang dan Tanggung Jawab Komite Kebijakan Perkreditan, paling sedikit mencakup :

a. Memberikan masukan kepada Direksi dalam rangka penyusunan Kebijakan Perkreditan Bank, terutama yang berkaitan dengan perumusan prinsip kehatihatian dalam perkreditan.
b. Mengawasi agar Kebijakan Perkreditan Bank dapat diterapkan dan dilaksanakan secara konsekuen dan konsisten serta merumuskan pemecahannya apabila terdapat hambatan/kendala dalam penerapannya.
c. Melakukan kajian berkala terhadap Kebijakan Perkreditan Bank dan memberikan saran kepada Direksi apabila diperlukan perubahan dan perbaikan.

## Duties and Responsibilities

The Duties, Authorities and Responsibilities of the Credit Policy Committee, at least include:

a. Providing input to the Board of Directors in the preparation of the Bank's Credit Policy, especially those related to the formulation of the principle of prudence in credit.
b. Supervising that the Bank's Credit Policy can be implemented and executed consistently and consistently and formulating solutions if there are obstacles/constraints in its implementation.
c. Conducting periodic reviews of the Bank's Credit Policy and providing suggestions to the Board of Directors if changes and improvements are needed.

d. Memantau dan mengevaluasi perkembangan dan kualitas portofolio perkreditan secara keseluruhan.
e. Memantau dan mengevaluasi kebenaran pelaksanaan penggunaan wewenang memutus kredit.
f. Memantau dan mengevaluasi kebenaran proses pemberian, perkembangan, dan kualitas kredit yang diberikan kepada pihak terkait dengan Bank dan debiturdebitur besar tertentu.
g. Memantau dan mengevaluasi kebenaran pelaksanan ketentuan Batas Maksimum Pemberian Kredit (BMPK).
h. Memantau dan mengevaluasi ketaatan terhadap ketentuan perundang-undangan dan peraturan lainnya dalam pelaksanaan pemberian kredit.
i. Memantau dan mengevaluasi penyelesaian kredit bermasalah sesuai dengan pola yang ditetapkan dalam Kebijakan Perkreditan Bank.
j. Memantau dan mengevaluasi Upaya Bank dalam memenuhi kecukupan jumlah penyisihan untuk penghapusbukuan kredit.
k. Menyampaikan laporan tertulis secara berkala minimial 1 (satu) kali dalam setahun kepada Direksi dengan tembusan kepada Dewan Komisaris mengenai:
   i. hasil pengawasan atas penerapan dan pelaksanaan Kebijakan Perkreditan.
   ii. hasil pemantauan dan evaluasi dalam butir d – j
l. Memberikan saran langkah-langkah perbaikan kepada Direksi dengan tembusan kepada Dewan Komisaris mengenai hal-hal yang terkait dengan butir k.

## Rapat

### Kebijakan

Rapat Komite Kebijakan Perkreditan diselenggarakan, paling sedikit 2 (dua) kali dalam setahun atau semesteran atau sesuai dengan kebutuhan Bank Sinarmas, dan dapat diselenggarakan secara offline (tatap muka) dan/atau online menggunakan media aplikasi.

### Frekuensi dan Kehadiran

Sepanjang tahun 2024, Komite Kebijakan Perkreditan (KKP) telah menyelenggarakan 1 kali rapat. Rinciannya frekuensi dan kehadiran disampaikan dalam tabel di bawah ini.

d. Monitoring and evaluating the development and quality of the overall credit portfolio.
e. Monitoring and evaluating the correctness of the implementation of the use of the authority to decide on credit.
f. Monitoring and evaluating the correctness of the process of granting, development, and quality of credit given to parties related to the Bank and certain large debtors.
g. Monitoring and evaluating the correctness of the implementation of the provisions of the Maximum Credit Limit (BMPK).
h. Monitoring and evaluating compliance with the provisions of laws and other regulations in the implementation of credit provision.
i. Monitor and evaluate the settlement of problem loans in accordance with the pattern set out in the Bank's Credit Policy.
j. Monitor and evaluate the Bank's efforts to meet the adequacy of the amount of provisions for credit write-offs.
k. Submit written reports periodically at least once a year to the Board of Directors with a copy to the Board of Commissioners regarding:
   i. results of supervision of the application and implementation of the Credit Policy.
   ii. results of monitoring and evaluation in points d - j
l. Provide suggestions for corrective measures to the Board of Directors with a copy to the Board of Commissioners regarding matters related to point k.

## Meetings

### Policy

The Credit Policy Committee convenes meetings at least twice a year, or once every semester, and may also meet more frequently as required by Bank Sinarmas. These meetings may be conducted either in person or virtually through digital conferencing platforms.

### Frequency and Attendance

Throughout 2024, the Credit Policy Committee (KKP) has held 1 meeting. Details of the frequency and attendance are presented in the table below.

| Nama<br>Name | Jabatan<br>Position | Jumlah Rapat<br>Number of Meetings | Jumlah Kehadiran<br>Number of Attendance | Frekuensi/Tingkat Kehadiran (%)<br>Frequency/Attendance Rate (%) |
|---|---|---|---|---|
| Frenky Tirtowijoyo | Ketua & Anggota Tetap Komite<br>Chair & Permanent Member of the Committee | 1 | 1 | 100% |
| Amandalia Johanes | Anggota Tetap Komite<br>Permanent Member of the Committee | 1 | 1 | 100% |
| Enny Kamal | Anggota Tetap Komite<br>Permanent Member of the Committee | 1 | 1 | 100% |
| Ekajaya Ongny Putra | Anggota Tetap Komite<br>Permanent Member of the Committee | 1 | 1 | 100% |
| Miko Andidjaja | Anggota Tetap Komite<br>Permanent Member of the Committee | 1 | 1 | 100% |

| Nama<br>Name | Jabatan<br>Position | Jumlah Rapat<br>Number of Meetings | Jumlah Kehadiran<br>Number of Attendance | Frekuensi/Tingkat Kehadiran (%)<br>Frequency/Attendance Rate (%) |
|---|---|---|---|---|
| Sendy | Anggota Tetap Komite<br>Permanent Member of the Committee | 1 | 1 | 100% |
| Santy Jamhari | Sekretaris & Anggota Tetap Komite<br>Secretary & Permanent Member of the Committee | 1 | 1 | 100% |
| Frieda Junia | Anggota Tetap Komite<br>Permanent Member of the Committee | 1 | 1 | 100% |
| Muktiono Wibowo | Anggota Tidak Tetap Komite<br>Non-Permanent Member of the Committee | 1 | 1 | 100% |
| Fathur Rosidin | Anggota Tidak Tetap Komite<br>Non-Permanent Member of the Committee | 1 | 1 | 100% |
| Anup Kumar | Anggota Tidak Tetap Komite<br>Non-Permanent Member of the Committee | 1 | 1 | 100% |
| Yenni | Anggota Tidak Tetap Komite<br>Non-Permanent Member of the Committee | 1 | 1 | 100% |
| Wendy Wijaya | Anggota Tidak Tetap Komite<br>Non-Permanent Member of the Committee | 1 | 1 | 100% |
| Fera Febriani | Anggota Tidak Tetap Komite<br>Non-Permanent Member of the Committee | 1 | 1 | 100% |
| Yohanes Hutagalung | Anggota Tidak Tetap Komite<br>Non-Permanent Member of the Committee | 1 | 1 | 100% |
| Prisilia Maurin | Anggota Tidak Tetap Komite<br>Non-Permanent Member of the Committee | 1 | 1 | 100% |
| Theresia Tyas Piwi | Anggota Tidak Tetap Komite<br>Non-Permanent Member of the Committee | 1 | 1 | 100% |
| Septiana Jelika | Anggota Tidak Tetap Komite<br>Non-Permanent Member of the Committee | 1 | 1 | 100% |
| Femmy | Anggota Tidak Tetap Komite<br>Non-Permanent Member of the Committee | 1 | 1 | 100% |

### Agenda

| Tanggal<br>Date | Agenda |
|---|---|
| 16 Desember 2024<br>December 16, 2024 | Persetujuan Pedoman dan Tata Tertib Kerja Komite Kredit versi 1.0<br>Approval of the Credit Committee Guidelines and Work Rules version 1.0 |

### Pelaksanaan Tugas dan Tanggung Jawab Tahun 2024

Komite Kebijakan Perkreditan (KKP) telah melakukan perumusan terkait pedoman dan tata cara kerja komite kredit.

### Implementation of Duties and Responsibilities in 2024

The Credit Policy Committee (KKP) has formulated guidelines and procedures governing the operations and working mechanisms of the credit committee.

## KOMITE KREDIT

Komite Kredit merupakan komite yang terdiri dari anggota Direksi Bank dan pejabat terkait yang bertanggung jawab dan berwenang untuk memutuskan jumlah eksposur Bank dalam bentuk aktiva produktif sesuai dengan jumlah atau limit tertentu yang telah ditetapkan.

Untuk menjamin pemberian kredit yang objektif dan berkualitas, maka pada setiap keputusan kredit didasarkan pada hasil keputusan bersama, yaitu hasil keputusan Komite Kredit.

Komite Kredit di Bank, terdiri dari Komite Kredit Korporasi, Komite Kredit *Retail Business*, Komite Kredit *Micro & Small Business*, dan Komite Kredit *Consumer Loan*. Komite tersebut dibentuk berdasarkan keputusan Direksi dengan susunan keanggotaan mengacu pada prinsip *four eyes principle*.

## CREDIT COMMITTEE

The Credit Committee is a body composed of members of the Bank's Board of Directors and relevant officials, entrusted with the authority and responsibility to determine the Bank's exposure to productive assets, in accordance with specified thresholds or limits previously established.

To ensure objectivity and quality in credit provision, every credit decision is made collectively, based on the outcomes of deliberations and resolutions passed by the Credit Committee.

The Bank's Credit Committee comprises the Corporate Credit Committee, the Retail Business Credit Committee, the Micro & Small Business Credit Committee, and the Consumer Loan Credit Committee. Each committee was established by a resolution of the Board of Directors, with its membership structure designed in accordance with the four eyes principle.

### Pedoman Kerja

Komite Kredit menjalankan tugas tanggung jawabnya dengan berpedoman pada ketentuan eksternal maupun internal yang berlaku, antara lain:

1. Peraturan Otoritas Jasa Keuangan No. 17 tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum;
2. Peraturan Otoritas Jasa Keuangan No. 42 tahun 2017 tentang Kewajiban Penyusunan dan Pelaksanaan Kebijakan Perkreditan atau Pembiayaan Bank bagi Bank Umum;
3. Surat Keputusan tentang Kebijakan Perkreditan Bank atau Pembiayaan;
4. Surat Keputusan tentang Standar Operasional Prosedur (SOP) Perkreditan masing-masing segmen; dan
5. Surat Keputusan tentang Susunan dan Wewenang Memutus untuk Komite Kredit masing-masing segmen.

### Pernyataan Independensi

Bank menjamin bahwa seluruh anggota Komite Kredit bertindak secara independen dan tidak menerima/melakukan intervensi dari/kepada pihak lainnya. Komite Kredit juga tidak memiliki kepentingan serta keterkaitan yang bersifat pribadi yang berpotensi menimbulkan benturan kepentingan (*conflict of interest*) dengan Bank.

### Tugas dan Tanggung Jawab

Tugas dan tanggung jawab Komite Kredit, meliputi:

1. Memberikan persetujuan atau penolakan kredit sesuai dengan batas wewenang atau jenis kredit yang ditetapkan oleh Direksi;
2. Melakukan koordinasi dengan *Assets and Liabilities Committee* (ALCO) dalam aspek pendanaan kredit;
3. Melaksanakan tugas terutama dalam pemberian persetujuan kredit berdasarkan kompetensinya secara jujur, objektif, cermat, serta seksama; dan
4. Menolak permintaan dan/atau pengaruh pihak yang berkepentingan dengan pemohon kredit untuk memberikan persetujuan kredit yang hanya bersifat formalitas.

## KOMITE *INFORMATION TECHNOLOGY*

Komite *Information Technology* (IT) merupakan komite di tingkat eksekutif yang memberikan rekomendasi terkait penetapan rencana strategis terkait pelaksanaan sistem teknologi informasi. Komite ini dibentuk untuk meningkatkan daya saing Bank dalam hal pemanfaatan teknologi informasi yang tepat guna.

### Pedoman Kerja

Komite IT menjalankan tugas tanggung jawabnya dengan berpedoman pada SK.013/2024/DIR4-IT tanggal 1 April 2024 tentang *Information Technology Steering Committee Charter.*

### Work Guidelines

The Credit Committee carries out its duties and responsibilities by referring to applicable external and internal provisions, including:

1. Financial Services Authority Regulation No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks;
2. Financial Services Authority Regulation No. 42 of 2017 concerning the Obligation to Prepare and Implement Bank Credit or Financing Policies for Commercial Banks;
3. Decree on Bank Credit Policy or Financing;
4. Decree on Standard Operating Procedure (SOP) for Credit for each segment; and
5. Decree on the Composition and Decision-Making Authority for the Credit Committee for each segment.

### Independence Statement

The Bank guarantees that all members of the Credit Committee act independently and do not accept/conduct intervention from/to other parties. The Credit Committee also does not have any personal interests or relationships that have the potential to cause a conflict of interest with the Bank.

### Duties and Responsibilities

The duties and responsibilities of the Credit Committee include:

1. Approving or rejecting credit in accordance with the authority limits or types of credit set by the Board of Directors;
2. Coordinating with the Assets and Liabilities Committee (ALCO) in the aspect of credit funding;
3. Perform duties, particularly in granting credit approval, based on their competence with honesty, objectivity, prudence, and due diligence; and
4. Reject any requests and/or influence from parties with an interest in the credit applicant that aim to secure credit approval merely as a formality..

## INFORMATION TECHNOLOGY COMMITTEE

The Information Technology (IT) Committee is a committee at the executive level that provides recommendations regarding the determination of strategic plans related to the implementation of information technology systems. This committee was formed to increase the Bank's competitiveness in terms of the appropriate use of information technology.

### Work Guidelines

The IT Committee carries out its duties and responsibilities based on SK.013/2024/DIR4-IT dated April 1, 2024 concerning the Information Technology Steering Committee Charter.

## Struktur dan Komposisi

Struktur dan komposisi Komite IT berdasarkan SK.013/2024/DIR4-IT tanggal 1 April 2024 tentang *Information Technology Steering Committee Charter*, diungkapkan sebagai berikut.

## Structure and Composition

The structure and composition of the IT Committee based on SK.013/2024/DIR4-IT dated April 1, 2024 concerning the Information Technology Steering Committee Charter, are disclosed as follows.

| Jabatan dalam Komite<br>Positions in the Committee | Pelaksana<br>Manager | Hak Suara<br>Voting Rights |
|---|---|---|
| Ketua<br>Chairman | Direktur Utama<br>President Director | √ |
| Wakil Ketua<br>Vice Chairman | Direktur yang membidangi *Information Technology & Digital Experience*<br>Director in charge of Information Technology & Digital Experience | √ |
| Sekretaris<br>Secretary | Pejabat tertinggi yang membidangi IT *Governance, Strategy, Architecture, Planning & Information Security*<br>Highest official in charge of IT Governance, Strategy, Architecture, Planning & Information Security | √ |
| Anggota<br>Member | Direktur yang membidangi *Risk Management*<br>Director in charge of Risk Management | √ |
| | Pejabat tertinggi yang membidangi *Finance & Performance Management*<br>The highest official in charge of Finance & Performance Management | √ |

## Pernyataan Independensi

Bank menjamin bahwa seluruh anggota Komite IT bertindak secara independen dan tidak menerima/melakukan intervensi dari/kepada pihak lainnya. Komite IT juga tidak memiliki kepentingan serta keterkaitan yang bersifat pribadi yang berpotensi menimbulkan benturan kepentingan (*conflict of interest*) dengan Bank.

## Independence Statement

The Bank ensures that all members of the IT Committee perform their duties independently and are free from any form of intervention from or toward other parties. Furthermore, the IT Committee maintains objectivity by not having any personal interests or affiliations that could potentially lead to a conflict of interest with the Bank.

## Tugas dan Tanggung Jawab

Komite IT memiliki wewenang dan tanggung jawab untuk memberikan rekomendasi kepada Direksi meliputi namun tidak terbatas pada:

1. Rencana strategis TI yang sejalan dengan rencana korporasi Bank;
2. Kebijakan, Standar, dan Prosedur TI;
3. Kesesuaian antara rencana pengembangan TI dan rencana strategis TI;
4. Kesesuaian antara pelaksanaan pengembangan TI dan rencana pengembangan TI;
5. Evaluasi atas efektivitas biaya TI terhadap pencapaian manfaat yang direncanakan;
6. Pemantauan atas kinerja TI dan upaya peningkatan kinerja TI;
7. Upaya penyelesaian berbagai masalah terkait TI yang tidak dapat diselesaikan oleh satuan kerja pengguna dan penyelenggara TI secara efektif, efisien, dan tepat waktu;
8. Kecukupan dan alokasi sumber daya terkait TI yang dimiliki Bank;
9. Mengkaji *technology threshold* untuk permintaan produk atau teknologi baru. Yaitu bahwa produk atau teknologi yang diminta akan menghasilkan biaya pengembangan dan operasional yang lebih rendah dibandingkan dengan biaya riil, biaya risiko, dan/atau biaya kesempatan (*opportunity cost*) atas solusi manual atau tanpa produk atau teknologi yang diminta;
10. Mengkaji *business case* untuk produk-produk baru, kebutuhan kapabilitas yang diperlukan, serta memberikan persetujuan atau melakukan penyesuaian yang diperlukan;

## Duties and Responsibilities

The IT Committee has the authority and responsibility to provide recommendations to the Board of Directors including but not limited to:

1. IT strategic plan that is in line with the Bank's corporate plan;
2. IT Policies, Standards, and Procedures;
3. Conformity between the IT development plan and the IT strategic plan;
4. Conformity between the implementation of IT development and the IT development plan;
5. Evaluation of the effectiveness of IT costs against achieving planned benefits;
6. Monitoring of IT performance and efforts to improve IT performance;
7. Efforts to resolve various IT-related problems that cannot be resolved by the IT user and IT organizer work units effectively, efficiently, and on time;
8. Adequacy and allocation of IT-related resources owned by the Bank;
9. Reviewing the technology threshold for requests for new products or technologies. Namely that the requested product or technology will result in lower development and operational costs compared to the real costs, risk costs, and/or opportunity costs of manual solutions or without the requested product or technology;
10. Reviewing the business case for new products, the required capability requirements, and providing approval or making necessary adjustments;

11. Mengkaji arsitektur perusahaan (*enterprise architecture*) dan rencana pengembangan produk teknologi (*technology product roadmap*);
12. Kesesuaian antara TI dengan kebutuhan sistem informasi manajemen serta kebutuhan kegiatan usaha Bank; dan
13. Efektivitas langkah-langkah dalam meminimalisasi risiko atas investasi Bank pada sektor TI agar investasi Bank pada sektor TI memberikan kontribusi terhadap pencapaian tujuan bisnis Bank.

11. Reviewing the enterprise architecture and technology product roadmap;
12. The suitability of IT with the needs of the management information system and the needs of the Bank's business activities; and
13. The effectiveness of steps in minimizing the risk of the Bank's investment in the IT sector so that the Bank's investment in the IT sector contributes to achieving the Bank's business goals.

## Rapat

### Kebijakan

Sesuai ketentuan Peraturan Otoritas Jasa Keuangan No. 17 tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum, Rapat Komite IT diselenggarakan sesuai dengan kebutuhan Bank.

### Frekuensi dan Kehadiran

Sepanjang tahun 2024, komite ini menyelenggarakan 10 kali rapat, dengan agenda sebagai berikut.

## Meeting

### Policy

In accordance with the provisions of the Financial Services Authority Regulation No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks, IT Committee Meetings are held according to the Bank's needs.

### Frequency and Attendance

Throughout 2024, the committee held 10 meetings, with the following agenda.

| Jabatan<br>Position | Jumlah Rapat<br>Number of Meetings | Jumlah Kehadiran<br>Number of Attendance | Frekuensi/Tingkat Kehadiran (%)<br>Frequency/Attendance Rate (%) |
|---|---|---|---|
| Direktur Utama<br>President Director | 10 | 9 | 90 |
| Direktur yang membidangi *Information Technology & Digital Experience*<br>Director in charge of Information Technology & Digital Experience | 10 | 10 | 100 |
| Pejabat tertinggi yang membidangi IT *Governance, Strategy, Architecture, Planning & Information Security*<br>Highest official in charge of IT Governance, Strategy, Architecture, Planning & Information Security | 10 | 10 | 100 |
| Direktur yang membidangi *Risk Management*<br>Director in charge of Risk Management | 10 | 10 | 100 |
| Pejabat tertinggi yang membidangi *Finance & Performance Management*<br>Highest official in charge of Finance & Performance Management | 10 | 4 | 40 |

## Agenda

| Tanggal<br>Date | Agenda |
|---|---|
| 22 Februari 2024<br>February 22, 2024 | 1) Faktor Risiko Fundamental IT Bank Sinarmas Rencana Mitigasinya<br>2) Rencana & Pemenuhan Kebutuhan SDM IT<br>3) Pelatihan Karyawan IT Group<br>4) Tindak Lanjut Temuan OJK bidang IT<br>1) Bank Sinarmas IT Fundamental Risk Factors Mitigation Plan<br>2) IT HR Needs Plan & Fulfillment<br>3) IT Group Employee Training<br>4) Follow-up on OJK Findings in the IT Sector |
| 30 Mei 2024<br>May 30, 2024 | Product Workshop 2024 |
| 27 Juni 2024<br>June 27, 2024 | Update Project IT – Product Workshop Mid 2024 |
| 15 Agustus 2024<br>August 15, 2024 | IT Project Update |
| 19 September 2024<br>September 19, 2024 | IT Project Update |
| 31 Oktober 2024<br>October 31, 2024 | IT Project Update |

| Tanggal<br>Date | Agenda |
|---|---|
| 5 November 2024 (1)<br>November 5, 2024 (1) | Product Workshop & Prioritisasi Inisiatif 2025<br>Product Workshop & Prioritization of Initiatives 2025 |
| 5 November 2024 (2)<br>November 5, 2024 (2) | Product Workshop & Prioritisasi Inisiatif 2025<br>Product Workshop & Prioritization of Initiatives 2025 |
| 6 November 2024<br>November 6, 2024 | Product Workshop & Prioritisasi Inisiatif 2025<br>Product Workshop & Prioritization of Initiatives 2025 |
| 19 Desember 2024<br>December 19, 2024 | Prioritisasi Inisiatif 2025<br>Prioritization of Initiatives 2025 |

### Pelaksanaan Tugas dan Tanggung Jawab Tahun 2024

Sepanjang tahun 2024, Komite IT Bank Sinarmas telah melaksanakan tugas dan tanggung jawabnya sesuai dengan POJK No.11/POJK.03/2022 tentang Penyelenggaraan Teknologi Informasi oleh Bank Umum dan SK.013/2024/DIR4-IT tanggal 1 April 2024 tentang Information Technology Steering Committee Charter.

## KOMITE MANAJEMEN RISIKO TERINTEGRASI

Konglomerasi keuangan adalah Lembaga Jasa Keuangan (LJK) yang berada dalam satu grup atau kelompok karena adanya keterkaitan kepemilikan dan/atau pengendalian. Konglomerasi keuangan dikepalai oleh Entitas Utama (EU) yang merupakan LJK induk Konglomerasi Keuangan yang ditunjuk oleh Pemegang Saham pengendali Konglomerasi Keuangan.

Bank Sinarmas selaku Entitas Utama dalam Konglomerasi Keuangan Sinar Mas melakukan penerapan manajemen risiko terintegrasi secara komprehensif dan efektif yang disesuaikan dengan karakteristik dan kompleksitas usaha.

Entitas Utama telah menetapkan tujuan, ruang lingkup, struktur Konglomerasi Keuangan dan membentuk Komite Manajemen Risiko Terintegrasi yang beranggotakan Direktur Entitas Utama yang membawahkan fungsi Manajemen Risiko sebagai ketua merangkap anggota Komite Manajemen Risiko Terintegrasi, Direktur yang mewakili atau ditunjuk dari LJK Konglomerasi Keuangan, dan Pejabat Eksekutif sebagai anggota tetap dan dapat ditambah dengan keanggotaan yang bersifat tidak tetap sesuai kebutuhan dalam Lembaga Jasa Keuangan Konglomerasi Keuangan Sinar Mas dengan tugas dan tanggung jawab dalam penerapan Tata Kelola Terintegrasi disesuaikan dengan karakteristik dan kompleksitas usaha serta risiko yang melekat pada Konglomerasi Keuangan. Hasil rapat Komite Manajemen Risiko Terintegrasi dituangkan dalam risalah rapat dan didokumentasikan dengan baik.

### Pedoman Kerja

Komite Manajemen Risiko Terintegrasi menjalankan tugas tanggung jawabnya dengan berpedoman pada Peraturan Otoritas Jasa Keuangan No. 17/POJK.03/2017 tentang Penerapan Manajemen Risiko Terintegrasi bagi Konglomerasi Keuangan dan Surat Keputusan No. 023/2023/DIRUT-EU tentang Pedoman Tata Tertib Komite Manajemen Risiko Terintegrasi.

### Implementation of Duties and Responsibilities in 2024

Throughout 2024, the IT Committee of Bank Sinarmas carried out its duties and responsibilities in accordance with Financial Services Authority Regulation (POJK) No. 11/POJK.03/2022 concerning the Implementation of Information Technology by Commercial Banks, and Decree No. SK.013/2024/DIR4-IT dated April 1, 2024, regarding the Information Technology Steering Committee Charter.

## INTEGRATED RISK MANAGEMENT COMMITTEE

A financial conglomerate refers to a group of Financial Services Institutions (Lembaga Jasa Keuangan/LJK) that are affiliated through ownership and/or control. This group is led by a Main Entity, which is the designated parent financial institution within the financial conglomerate, appointed by the conglomerate's controlling shareholder.

As the Main Entity within the Sinar Mas Financial Conglomerate, Bank Sinarmas implements integrated risk management in a comprehensive and effective manner, adjusted to the characteristics and complexity of its business activities.

The Financial Conglomerate's objectives, scope, and structure have been defined by the Main Entity. The Integrated Risk Management Committee is chaired by the Director of the Main Entity, who also serves on the committee. Other members include directors representing or appointed from other financial institutions within the conglomerate, as well as executive officers, who serve as permanent members, with additional non-permanent members added as needed based on the Sinar Mas Financial Conglomerate structure. This committee's duties and responsibilities are consistent with the implementation of Integrated Governance, but have been tailored to the Financial Conglomerate's specific characteristics, business complexity, and inherent risks. All meeting outcomes are documented in formal meeting minutes and archived appropriately.

### Working Guidelines

The Integrated Risk Management Committee performs its duties and responsibilities based on the Financial Services Authority Regulation No. 17/POJK.03/2017 concerning Integrated Risk Management Implementation for Financial Conglomerates, and Decree No. 023/2023/DIRUT-EU regarding the Guidelines and Rules of Procedure for the Integrated Risk Management Committee.

## Struktur dan Komposisi

Struktur dan komposisi Komite Manajemen Risiko Terintegrasi berdasarkan Surat Keputusan No. 023/2023/DIRUT-EU tentang Pedoman dan Tata Tertib Kerja Komite Manajemen Risiko Terintegrasi, diungkapkan sebagai berikut.

## Structure and Composition

The structure and composition of the Integrated Risk Management Committee are outlined in Decree No. 023/2023/DIRUT-EU concerning the Guidelines and Rules of Procedure for the Integrated Risk Management Committee.

| Jabatan dalam Komite<br>Positions in the Committee | Pelaksana<br>Manager | Hak Suara<br>Voting Rights |
|---|---|---|
| Ketua (Anggota Tetap)<br>Chairman<br>(Permanent Member) | Direktur Entitas Utama yang membawahi manajemen risiko terintegrasi (PT. Bank Sinarmas Tbk.)<br>Director of the Main Entity in charge of integrated risk management (PT. Bank Sinarmas Tbk.) | √ |
| Sekretaris Komite (Anggota Tetap)<br>Committee Secretary<br>(Permanent Member) | *Risk Management Group Head* | √ |
| Anggota Tetap<br>Permanent Member | Direktur Utama Entitas Utama<br>President Director of the Main Entity | √ |
| | Seluruh Direktur Lembaga Jasa Keuangan Konglomerasi Keuangan Sinar Mas yang membawahi Fungsi Manajemen Risiko dan/atau Direktur yang ditunjuk oleh Lembaga Jasa Keuangan.<br>All Directors of Financial Services Institutions of the Sinar Mas Financial Conglomerate in charge of the Risk Management Function and/or Directors appointed by the Financial Services Institution. | √ |
| Anggota Tidak Tetap<br>Non-Permanent Member | Kepala Satuan Kerja Kepatuhan Entitas Utama<br>Head of Compliance Work Unit of the Main Entity | x |
| | Kepala Satuan Kerja Audit Internal Entitas Utama<br>Head of Internal Audit Work Unit of the Main Entity | x |
| | Satuan Kerja yang melaksanakan Fungsi Manajemen Risiko pada masing-masing LJK dalam Konglomerasi Keuangan Sinar Mas<br>Work Units that carry out the Risk Management Function in each LJK in the Sinar Mas Financial Conglomerate | x |

## Tugas dan Tanggung Jawab

Komite Manajemen Risiko Terintegrasi memiliki wewenang dan tanggung jawab untuk memberikan rekomendasi kepada Direksi Entitas Utama, berupa:

1. Penyusunan dan perbaikan Kebijakan Manajemen Risiko Terintegrasi berupa penyempurnaan strategi dan kerangka Risiko berdasarkan hasil evaluasi pelaksanaan termasuk tingkat risiko yang diambil serta toleransi risiko yang dapat di terima.
2. Merekomendasikan Laporan yang dipantau seperti Profil Risiko Konglomerasi Keuangan, Laporan Kewajiban Penyediaan Modal Minimun Terintegrasi Konglomerasi Keuangan, Laporan Transaksi Intragrup dan Laporan Stress Test yang wajib disampaikan secara berkala kepada regulator.

## Duties and Responsibilities

The Integrated Risk Management Committee has the authority and responsibility to provide recommendations to the Board of Directors of the Main Entity, in the form of:

1. Preparation and improvement of the Integrated Risk Management Policy in the form of improving the Risk strategy and framework based on the results of the implementation evaluation including the level of risk taken and acceptable risk tolerance.
2. Recommend monitored Reports such as the Financial Conglomerate Risk Profile, the Financial Conglomerate Integrated Minimum Capital Requirement Report, the Intragroup Transaction Report and the Stress Test Report, which must be submitted periodically to the regulator.

## Rapat

### Kebijakan

Sesuai ketentuan Peraturan Otoritas Jasa Keuangan No. 17 tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum, Rapat Komite Manajemen Risiko Terintegrasi diselenggarakan sesuai dengan kebutuhan Bank. Konglomerasi Keuangan Sinarmas menentukan rapat Komite Manajemen Risiko Terintegrasi diselenggarakan minimal 2 (dua) kali dalam satu tahun dan dapat dilaksanakan lebih jika dirasa perlu sebagai bagian dari fungsi pemantauan. Hasil rapat Komite Manajemen Risiko Terintegrasi dituangkan dalam risalah rapat dan didokumentasikan dengan baik.

## Meetings

### Policy

In accordance with the provisions of the Financial Services Authority Regulation No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks, the Integrated Risk Management Committee Meeting is held according to the Bank's needs. The Sinarmas Financial Conglomerate determines that the Integrated Risk Management Committee meeting is held at least 2 (two) times a year and can be held more if deemed necessary as part of the monitoring function. The results of the Integrated Risk Management Committee meeting are stated in the minutes of the meeting and are well documented.

**Frekuensi dan Kehadiran**

Sepanjang tahun 2024, komite telah menyelenggarakan 5 (lima) kali rapat, dengan agenda sebagai berikut.

**Frequency and Attendance**

Throughout 2024, the committee has held 5 (five) meetings, with the following agenda.

| Jabatan<br>Position | Jumlah Rapat<br>Number of Meetings | Jumlah Kehadiran<br>Number of Attendance | Frekuensi/Tingkat Kehadiran (%)<br>Frequency/Attendance Rate (%) |
|---|---|---|---|
| Direktur Entitas Utama yang membawahi manajemen risiko terintegrasi (PT. Bank Sinarmas Tbk.)<br>Main Entity Director in charge of integrated risk management (PT. Bank Sinarmas Tbk.) | 5 | 5 | 100 |
| Satuan Kerja Manajemen Risiko Entitas Utama<br>Main Entity Risk Management Work Unit | 5 | 5 | 100 |
| Direktur Utama Entitas Utama<br>Main Entity President Director | 5 | 3 | 60 |
| Seluruh Direktur Lembaga Jasa Keuangan Konglomerasi Keuangan Sinar Mas yang membawahi Fungsi Manajemen Risiko dan/atau Direktur yang ditunjuk oleh Lembaga Jasa Keuangan.<br>All Directors of Financial Services Institutions of Sinar Mas Financial Conglomerate in charge of Risk Management Function and/or Directors appointed by Financial Services Institutions. | 5 | 5 | 100 |
| Kepala Satuan Kerja Kepatuhan Entitas Utama<br>Head of Compliance Work Unit of Main Entity | 5 | 4 | 80 |
| Kepala Satuan Kerja Audit Internal Entitas Utama<br>Head of Internal Audit Work Unit of Main Entity | 5 | 5 | 100 |
| Satuan Kerja yang melaksanakan Fungsi Manajemen Risiko pada masing-masing LJK dalam Konglomerasi Keuangan Sinar Mas<br>Work Units that carry out Risk Management Functions in each LJK in Sinar Mas Financial Conglomerate | 5 | 5 | 100 |

## Agenda

| Tanggal<br>Date | Agenda |
|---|---|
| 29 Januari 2024<br>January 29, 2024 | 1. *Self Assessment* - Laporan Profil Risiko Terintegrasi posisi Semester I - Juni 2023 dan Proyeksi untuk Semester II - Desember 2023.<br>2. Penyempurnaan Manajemen Risiko Terintegrasi Tahun 2023 yang telah dan/atau akan dilakukan di tahun 2024.<br>3. Rencana pertumbuhan kredit/pembiayaan.<br>4. Perbaikan kualitas kredit Entitas Utama.<br>5. Konsentrasi investasi (pihak terafiliasi/BUMN/perusahaan dengan kinerja negatif) dan dampak kinerja surat berharga/investasi terhadap rentabilitas.<br>6. Penyelesaian permasalahan Batas Maksimum Pemberian Pembiayaan (BMPP) dan batas maksimum investasi.<br>7. Sinergi Bisnis Anggota Konglomerasi Keuangan Sinar Mas.<br>1. Self Assessment - Integrated Risk Profile Report for Semester I - June 2023 and Projection for Semester II - December 2023.<br>2. Improvement of Integrated Risk Management in 2023 that has been and/or will be carried out in 2024.<br>3. Credit/financing growth plan.<br>4. Improvement of Main Entity credit quality.<br>5. Investment concentration (affiliated parties/BUMN/companies with negative performance) and the impact of securities/ investment performance on profitability.<br>6. Resolution of the Maximum Financing Limit (BMPP) and maximum investment limit issues.<br>7. Business Synergy of Sinar Mas Financial Conglomerate Members. |
| 3 April 2024<br>April 3, 2024 | 1. Pelaporan Konglomerasi Keuangan baru – Perubahan atau Penambahan anggota Konglomerasi Keuangan.<br>2. Kaji ulang Metodologi Pengukuran Penilaian Laporan Tingkat Kesehatan Terintegrasi Konglomerasi Keuangan Sinar Mas.<br>3. Rekomendasi Bobot Risiko Laporan Tingkat Kesehatan Terintegrasi Per aspek Penilaian & Per Bidang Usaha tahun 2024.<br>4. Rekomendasi Bobot Risiko Laporan Profil Risiko per Jenis Risiko<br>5. Hasil Simulasi Laporan Tingkat Kesehatan Terintegrasi Konglomerasi Keuangan Sinar Mas dengan Proposal Bobot Risiko.<br>6. Hasil Simulasi Laporan Profil Risiko Terintegrasi Konglomerasi Keuangan Sinar Mas dengan Proposal Bobot Risiko.<br>7. Pemenuhan Permintaan Data LJK KK Sinar Mas (Profil Risiko, Rentabilitas, Permodalan & Ad Hoc).<br>1. Reporting of new Financial Conglomerates - Changes or Additions to Financial Conglomerate members.<br>2. Review of the Integrated Health Level Report Assessment Measurement Methodology of Sinar Mas Financial Conglomerate.<br>3. Risk Weight Recommendation for Integrated Health Level Report Per Assessment Aspect & Per Business Field in 2024.<br>4. Risk Weight Recommendation for Risk Profile Report per Risk Type<br>5. Simulation Results of Integrated Health Level Report of Sinar Mas Financial Conglomerate with Risk Weight Proposal.<br>6. Simulation Results of Integrated Risk Profile Report of Sinar Mas Financial Conglomerate with Risk Weight Proposal.<br>7. Fulfillment of Data Request for LJK KK Sinar Mas (Risk Profile, Profitability, Capital & Ad Hoc). |

| Tanggal<br>Date | Agenda |
|---|---|
| 17 Mei 2024<br>May 17, 2024 | 1. Rekomendasi *Risk Appetite* dan/atau *Risk Tolerance* Konglomerasi Keuangan Sinar Mas.<br>1.1. Dasar Penetapan *Risk Appetite* dan/atau *Risk Tolerance* Konglomerasi Keuangan Sinar Mas.<br>1.2. Metodologi *Risk Appetite* dan/atau *Risk Tolerance* Konglomerasi Keuangan Sinar Mas.<br>1.3. *Risk Appetite* dan/atau *Risk Tolerance* Per Jenis Risiko Konglomerasi Keuangan Sinar Mas.<br>2. Rekomendasi Ketentuan Pengambilan Tindakan Saat Pelampauan *Risk Appetite* dan/atau *Risk Tolerance* Konglomerasi Keuangan Sinar Mas.<br>3. Realisasi Rencana Kerja Satuan Kerja Manajemen Risiko Terintegrasi 2023.<br>4. Rencana Kerja Satuan Kerja Manajemen Risiko Terintegrasi 2024.<br>1. Recommendations on Risk Appetite and/or Risk Tolerance of Sinar Mas Financial Conglomerate.<br>1.1. Basis for Determining Risk Appetite and/or Risk Tolerance of Sinar Mas Financial Conglomerate.<br>1.2. Methodology for Risk Appetite and/or Risk Tolerance of Sinar Mas Financial Conglomerate.<br>1.3. Risk Appetite and/or Risk Tolerance Per Type of Risk of Sinar Mas Financial Conglomerate.<br>2. Recommendations on Provisions for Taking Action When Risk Appetite and/or Risk Tolerance of Sinar Mas Financial Conglomerate is Exceeded.<br>3. Realization of the Integrated Risk Management Work Unit Work Plan 2023.<br>4. Integrated Risk Management Work Unit Work Plan 2024. |
| 2 Juli 2024<br>July 2, 2024 | 1. Rekomendasi Kaji Ulang untuk Parameter, Rentang Risiko, Bobot Risiko Laporan Profil Risiko Terintegrasi Tahun 2024.<br>2. Simulasi Peringkat Profil Risiko Terintegrasi Posisi 31 Desember 2023.<br>1. Review Recommendations for Parameters, Risk Range, Risk Weight of Integrated Risk Profile Report 2024.<br>2. Integrated Risk Profile Rating Simulation Position 31 December 2023. |
| 13 Agustus 2024<br>August 13, 2024 | 1. Performance Konglomerasi Keuangan Sinar Mas Semester I – 2024.<br>2. Rekomendasi Laporan Profil Risiko Terintegrasi Posisi Semester I – 2024.<br>3. Rekomendasi Laporan Kewajiban Penyediaan Modal Minimum (KPMM) Terintegrasi Posisi Semester I – 2024.<br>4. Rekomendasi Laporan *Stress Testing* Terintegrasi KK Sinar Mas Semester I - 2024 .<br>5. Tindak Lanjut Pemantauan Dan Langkah Perbaikan mengacu pada Surat OJK S-12/PB.11/2024 tertanggal 02 Mei 2024.<br>6. Pemantauan *Risk Appetite* dan *Risk Tolerance* Semester I – 2024.<br>1. Sinar Mas Financial Conglomerate Performance Semester I – 2024.<br>2. Recommendations for Integrated Risk Profile Report Position Semester I – 2024.<br>3. Recommendations for Integrated Capital Adequacy Ratio (KPMM) Report Position Semester I – 2024.<br>4. Recommendations for Integrated Stress Testing Report of Sinar Mas KK Semester I - 2024.<br>5. Follow-up Monitoring and Corrective Steps referring to OJK Letter S-12/PB.11/2024 dated May 2, 2024.<br>6. Monitoring of Risk Appetite and Risk Tolerance Semester I – 2024. |



## Pelaksanaan Tugas dan Tanggung Jawab Tahun 2024

Sepanjang tahun 2024, Komite Manajemen Risiko Terintegrasi Bank Sinarmas telah melaksanakan tugas dan tanggung jawab sebagai berikut.

1. *Monitoring* Penyempurnaan Manajemen Risiko Terintegrasi Tahun 2023 yang telah dan/atau akan dilakukan di tahun 2024.
2. *Monitoring* rencana pertumbuhan kredit dan pembiayaan selama tahun 2024.
3. *Monitoring* perbaikan kualitas kredit Lembaga Jasa Keuangan Bank dan pembiayaan.
4. *Monitoring* konsentrasi investasi pada pihak terafiliasi, BUMN dan perusahaan yang memiliki kinerja negatif dan dampak kinerja surat berharga/investasi yang dimiliki oleh Konglomerasi Keuangan terhadap rentabilitas.
5. *Monitoring* Batas Maksimum Pemberian Pembiayaan (BMPP), Batas Maksimum Pemberian Kredit (BMPK), Batas Maksimum Penyediaan Dana (BMPD) dan Batas Maksimum Investasi (BMI).
6. *Monitoring* Sinergi Bisnis Anggota Konglomerasi Keuangan Sinar Mas.
7. *Monitoring* Perubahan berupa Penambahan dan pengurangan anggota Konglomerasi Keuangan.
8. Merekomendasikan Metodologi Pengukuran Penilaian Laporan Tingkat Kesehatan Terintegrasi Konglomerasi Keuangan Sinar Mas baik dari penilaian per bidang usaha maupun per jenis risiko untuk digunakan di tahun 2024.

## Implementation of Duties and Responsibilities in 2024

Throughout 2024, the Integrated Risk Management Committee of Bank Sinarmas has carried out the following duties and responsibilities.

1. Monitoring the Improvement of Integrated Risk Management in 2023 that has been and/or will be carried out in 2024.
2. Monitoring the credit and financing growth plan during 2024.
3. Monitoring the improvement of the credit quality of Bank Financial Services Institutions and financing.
4. Monitoring the concentration of investment in affiliated parties, BUMN and companies that have negative performance and the impact of the performance of securities/investments owned by the Financial Conglomerate on profitability.
5. Monitoring the Maximum Financing Limit (BMPP), Maximum Credit Limit (BMPK), Maximum Fund Provision Limit (BMPD) and Maximum Investment Limit (BMI).
6. Monitoring the Business Synergy of Members of the Sinar Mas Financial Conglomerate.
7. Monitoring Changes in the form of Additions and Reductions of Members of the Financial Conglomerate.
8. Recommend the Measurement Methodology for the Integrated Health Level Report Assessment of the Sinar Mas Financial Conglomerate, both from the assessment per business sector and per type of risk to be used in 2024.

9. *Monitoring* Simulasi Laporan Tingkat Kesehatan Terintegrasi Konglomerasi Keuangan Sinar Mas tahun 2023.
10. Merekomendasikan metodologi dan parameter *Risk Appetite* dan/atau *Risk Tolerance* Konglomerasi Keuangan Sinar Mas tahun 2024.
11. Mengetahui Rencana Kerja Satuan Kerja Manajemen Risiko Terintegrasi 2023.
12. Merekomendasikan Rencana Kerja Satuan Kerja Manajemen Risiko Terintegrasi 2024.
13. Merekomendasikan Kaji Ulang untuk Parameter, Rentang Risiko, Bobot Risiko Laporan Profil Risiko Terintegrasi Tahun 2024.
14. *Monitoring* Performance Konglomerasi Keuangan Sinar Mas Semester II – 2023 dan Semester I – 2024 diantaranya total aset, modal, dan laba serta penghargaan yang diterima.
15. Merekomendasikan Laporan Profil Risiko Terintegrasi Posisi Semester II – 2023 dan Semester I – 2024.
16. Merekomendasikan Laporan Kewajiban Penyediaan Modal Minimum (KPMM) Terintegrasi Posisi Semester II – 2023 dan Semester I – 2024.
17. Merekomendasikan Laporan Stress Testing Terintegrasi KK Sinar Mas Semester II – 2023 dan Semester I – 2024
18. *Monitoring* Tindak Lanjut Pemantauan Dan Langkah Perbaikan mengacu pada Surat OJK S-12/PB.11/2024 tertanggal 02 Mei 2024.
19. *Monitoring Risk Appetite* dan *Risk Tolerance* Semester I – 2024 dan Semester II - 2024.

## ASSET & LIABILITY COMMITTEE (ALCO)

ALCO merupakan komite di tingkat eksekutif yang membantu efektivitas pelaksanaan tugas dan tanggung jawab Direksi terkait pengelolaan aset dan liabilitas secara berkesinambungan. Tujuannya adalah untuk mencapai keuntungan yang optimal dengan meminimalkan risiko yang muncul.

ALCO bertanggung jawab dalam menetapkan dan mengevaluasi kebijakan dan strategi pengelolaan likuiditas untuk menjaga likuiditas, memenuhi likuiditas Bank dan meminimalisasi idle funds. Pembentukan ALCO bertujuan untuk mencapai tingkat profitabilitas Bank secara optimum dengan tetap memenuhi ketentuan yang berlaku.

### Pedoman Kerja

ALCO menjalankan tugas tanggung jawabnya dengan berpedoman pada Surat Edaran No. SE.002/2023/DIR6-TRS tentang *Asset & Liability Management* (ALMA) *Working Group* dan *Asset & Liability Committee* (ALCO).

9. Monitoring the Simulation of the Integrated Health Level Report of the Sinar Mas Financial Conglomerate in 2023.
10. Recommend the methodology and parameters of the Risk Appetite and/or Risk Tolerance of the Sinar Mas Financial Conglomerate in 2024.
11. Knowing the Work Plan of the Integrated Risk Management Work Unit 2023.
12. Recommend the Work Plan of the Integrated Risk Management Work Unit 2024.
13. Recommend a Review of the Parameters, Risk Range, Risk Weight of the Integrated Risk Profile Report in 2024.
14. Monitoring the Performance of the Sinar Mas Financial Conglomerate Semester II - 2023 and Semester I - 2024 including total assets, capital, and profit as well as awards received.
15. Recommend the Integrated Risk Profile Report for Semester II – 2023 and Semester I – 2024.
16. Recommend the Integrated Minimum Capital Adequacy Requirement (KPMM) Report for Semester II – 2023 and Semester I – 2024.
17. Recommend the Integrated Stress Testing Report for KK Sinar Mas Semester II – 2023 and Semester I – 2024
18. Monitoring Follow-up Monitoring and Corrective Steps referring to OJK Letter S-12/PB.11/2024 dated May 02, 2024.
19. Monitoring Risk Appetite and Risk Tolerance for Semester I – 2024 and Semester II - 2024.

## ASSET & LIABILITY COMMITTEE (ALCO)

ALCO is a committee at the executive level that assists in the effective implementation of the Board of Directors' duties and responsibilities related to the management of assets and liabilities on an ongoing basis. The goal is to achieve optimal profits by minimizing emerging risks.

ALCO is responsible for determining and evaluating liquidity management policies and strategies to maintain liquidity, meet the Bank's liquidity and minimize idle funds. The establishment of ALCO aims to achieve the Bank's optimum level of profitability while still complying with applicable provisions.

### Work Guidelines

ALCO carries out its duties and responsibilities by referring to Circular Letter No. SE.002/2023/DIR6-TRS concerning the Asset & Liability Management (ALMA) Working Group and the Asset & Liability Committee (ALCO).

## Struktur dan Komposisi

Struktur dan komposisi ALMA & ALCO berdasarkan Surat Keputusan No. SK.039/2024/DIR6-TRS diungkapkan sebagai berikut.

## Structure and Composition

The structure and composition of ALMA & ALCO based on Decree No. SK.039/2024/DIR6-TRS are disclosed as follows.

| Jabatan dalam Komite<br>Positions in the Committee | Pelaksana<br>Manager | Hak Suara<br>Voting Rights |
|---|---|---|
| Ketua<br>Chairman | *President Director* | √ |
| Anggota dengan Hak Suara<br>Members with voting rights | *Lending & Wholesale Banking Director* | √ |
| | *Retail Banking Director* | √ |
| | *Operations & Consumer Business Director* | √ |
| | *Information Technology & Digital Experience Director* | √ |
| | *Compliance & Risk Management Director* | x |
| Anggota Inti<br>Core Members | *Treasury & Financial Institution Group Head* | x |
| | *Corporate Management (Corporate & Commercial) Group Head* | x |
| | *Risk Management Group Head* | x |
| | *Deposit Investment Product Development Group Head* | x |
| | *Sales & Distribution Group Head* | x |
| | *Corporate Banking Business Solution Group Head* | x |
| | *Finance & Performance Management Group Head* | x |
| | *Corporate & Commercial Banking Group Head* | x |
| | *Micro, Small & Medium Enterprise Business Group Head* | x |
| Anggota Pendukung<br>Supporting Members | *Credit Analyst & Early Warning (Corporate & Commercial) Division Head* | x |
| | *Core Corporate Funding & Business Management Group Head* | x |
| | *Financial Planning & Controlling Division Head* | x |
| | *Money Market Division Head* | x |
| | *Market, Liquidity & Enterprise Risk Management Division Head* | x |
| Invitee ALCO | *Internal Audit Group Head* | x |
| | *Compliance Group Head* | x |

## Pernyataan Independensi

Bank menjamin bahwa seluruh anggota ALCO bertindak secara independen dan tidak menerima/melakukan intervensi dari/kepada pihak lainnya. ALCO juga tidak memiliki kepentingan serta keterkaitan yang bersifat pribadi, yang berpotensi menimbulkan benturan kepentingan (*conflict of interest*) dengan Bank.

## Independence Statement

The Bank ensures that all members of the Asset and Liability Committee (ALCO) act independently and are free from any form of interference or influence from other parties. Furthermore, ALCO members do not possess any personal interests or affiliations that could potentially give rise to conflicts of interest with the Bank.

## Tugas dan Tanggung Jawab ALCO

ALCO bertanggung jawab untuk mengarahkan dan menentukan rencana, kebijakan, strategi, struktur neraca, likuiditas, profitabilitas, dan risiko yang terkait dengan risiko valuta asing dan tingkat suku bunga melalui proses pengawasan, identifikasi dan pengukuran paparan risiko dengan memperhatikan prinsip kehati-hatian.

## ALCO Duties and Responsibilities

ALCO is responsible for formulating and guiding plans, policies, strategies, and the structure of the Bank's balance sheet, including aspects of liquidity, profitability, and risk. This encompasses managing exposure to foreign exchange and interest rate risks through the ongoing processes of monitoring, identification, and measurement of risk, all while upholding the principle of prudence.

Secara garis besar, ALCO melakukan tinjauan, analisis, dan memberi rekomendasi saat diperlukan dalam hal-hal yang menyangkut rasio kualitatif dan kuantitatif, likuiditas dan indikator pasar sebagai berikut.

1. Mengkaji ulang dan merekomendasikan penetapan suku bunga dasar (*pricing*) yang dikenakan terutama pada produk kredit/pembiayaan dan *funding* yang berlaku untuk menjaga tingkat suku bunga dalam rangka mendorong tercapainya penggunaan dana dan biaya pendanaan yang optimal yang akan di putuskan pada rapat ALCO.
2. Memberi arahan strategi mengenai struktur modal perusahaan, pengalokasian modal di antara berbagai bisnis unit, menetapkan dan menyetujui kebijakan, strategi dan pedoman likuiditas dalam pendanaan untuk memaksimumkan pendapatan, dan memastikan permintaan dan sumber dana.
3. Melakukan pengelolaan likuiditas dengan berusaha menjaga kesenjangan likuiditas seminimal mungkin antara komposisi aset dan liabilitas pada suatu periode tertentu terkait kesenjangan arus kas, kesenjangan *repricing*, kesenjangan suku bunga dan kesenjangan antara jangka waktu jatuh tempo.
4. Memberi arahan dalam mengelola aset dan liabilitas yang sensitif terhadap suku bunga (*interest rate sensitive assets and liabilities*) dalam kondisi pergerakan suku bunga yang berfluktuasi untuk mengoptimalkan laba atau meminimalkan kerugian.
5. Pemantauan atas pemenuhan rasio-rasio regulator (seperti rasio intermediasi makroprudensial (RIM), rasio alat likuid terhadap *non-core* deposit (ALNCD), rasio alat likuid terhadap dana pihak ketiga (ALDPK), *liquidity coverage ratio* (LCR), *net stable funding ratio* (NSFR), *delta economic value of equity* (ΔEVE), rasio deposan inti, dan lain-lain), giro wajib minum (GWM), penyangga likuiditas makroprudensial (PLM).
6. Melakukan pemantauan terkait portofolio kepemilikan investasi yang dilakukan terkait penetapan penempatan, besaran notional portofolio, mata uang portofolio investasi dan *management action trigger* (MAT).
7. Menetapkan limit terhadap aktivitas *Treasury* Konvensional dan *Treasury* UUS untuk menghindari konsentrasi portofolio pada instrumen dan *counter parties* tertentu serta menetapkan kebijakan dan pengarahan terhadap *treasury* dalam mengelola likuiditas.
8. Melakukan kaji ulang terkait kebijakan rencana pendanaan darurat (*contingency funding plan*/CFP) dan pinjaman likuiditas jangka pendek (PLJP) Bank Indonesia serta melakukan uji coba terkait CFP dan PLJP Bank Indonesia secara berkala.
9. Menyusun kebijakan dan memberikan usulan dalam pengelolaan dan pengendalian kekayaan dan kewajiban keuangan Bank.
10. Memberikan wewenang kepada ketua dan sekretaris ALCO untuk menyusun dan menetapkan tata tertib;
11. Memberikan kewenangan kepada ALCO untuk mengundang pihak lain untuk hadir dalam rapat, apabila terjadi perubahan pada situasi ekonomi dan suku bunga pasar uang.

In general, ALCO conducts reviews, analyzes, and provides recommendations when necessary in matters concerning qualitative and quantitative ratios, liquidity and market indicators as follows.

1. Review and recommend the determination of the basic interest rate (pricing) imposed primarily on credit/financing and funding products that apply to maintain interest rates in order to encourage the achievement of optimal use of funds and funding costs, which will be decided at the ALCO meeting.
2. Provide strategic direction regarding the company's capital structure, capital allocation among various business units, establish and approve policies, strategies and guidelines for liquidity in funding to maximize revenue, and ensure demand and sources of funds.
3. Manage liquidity by trying to maintain a minimum liquidity gap between the composition of assets and liabilities in a certain period related to cash flow gaps, repricing gaps, interest rate gaps and gaps between maturity periods.
4. Provide direction in managing interest rate sensitive assets and liabilities in conditions of fluctuating interest rate movements to optimize profits or minimize losses.
5. Monitor the fulfillment of regulatory ratios (such as the macroprudential intermediation ratio (RIM), the ratio of liquid assets to non-core deposits (ALNCD), the ratio of liquid assets to third party funds (ALDPK), liquidity coverage ratio (LCR), net stable funding ratio (NSFR), delta economic value of equity (ΔEVE), core depositor ratio, etc.), minimum reserve requirement (GWM), macroprudential liquidity buffer (PLM).
6. Monitoring the investment ownership portfolio carried out related to the determination of placement, notional portfolio size, investment portfolio currency and management action trigger (MAT).
7. Setting limits on Conventional Treasury and UUS Treasury activities to avoid portfolio concentration on certain instruments and counter parties and setting policies and directions for treasury in managing liquidity.
8. Reviewing the policy on Bank Indonesia's contingency funding plan (CFP) and short-term liquidity loans (PLJP) and conducting periodic trials related to Bank Indonesia's CFP and PLJP.
9. Formulating policies and providing proposals in the management and control of the Bank's assets and financial liabilities.
10. Giving authority to the ALCO chairman and secretary to prepare and determine rules of procedure;
11. Giving authority to ALCO to invite other parties to attend meetings, if there are changes in the economic situation and money market interest rates.

12. Memiliki wewenang dan melakukan kaji ulang secara berkala dalam menentukan susunan anggota ALCO serta wewenang, tugas dan tanggung jawab ALCO.

12. Having the authority and conducting periodic reviews in determining the composition of ALCO members as well as the authority, duties and responsibilities of ALCO.

## Rapat

### Kebijakan

Sesuai ketentuan Peraturan Otoritas Jasa Keuangan No. 17 tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum, Rapat ALCO diselenggarakan sesuai dengan kebutuhan Bank.

### Frekuensi dan Kehadiran

Sepanjang tahun 2024, komite ini menyelenggarakan 11 kali rapat, dengan agenda membahas *Market Outlook, Performance Highlight, Credit Highlight,* Likuiditas, DPK, Pemantauan Risiko Pasar, Pemantauan Risiko Likuiditas, Deposan Inti, dan *Net Interest Income* (NII) dan Suku Bunga Dasar Kredit (SBDK).

## Meetings

### Policy

In accordance with the provisions of the Financial Services Authority Regulation No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks, ALCO Meetings are held according to the Bank's needs.

### Frequency and Attendance

Throughout 2024, this committee held 11 meetings, with the agenda of discussing Market Outlook, Performance Highlight, Credit Highlight, Liquidity, DPK, Market Risk Monitoring, Liquidity Risk Monitoring, Core Depositors, and Net Interest Income (NII) and Basic Credit Interest Rate (SBDK).

| Jabatan<br>Position | Jumlah Rapat<br>Number of Meetings | Jumlah Kehadiran<br>Number of Attendance | Frekuensi/Tingkat Kehadiran (%)<br>Frequency/Attendance Rate (%) |
|---|---|---|---|
| *President Director* | 11 | 10 | 90,9 |
| *Lending & Wholesale Banking Director* | 11 | 9 | 81,8 |
| *Retail Banking Director* | 11 | 10 | 90,9 |
| *Operations & Consumer Business Director* | 11 | 11 | 100,0 |
| *Information Technology & Digital Experience Director* | 11 | 10 | 90,9 |

## Agenda

| Tanggal<br>Date | Agenda |
|---|---|
| 22 Januari 2024<br>January 22, 2024 | - Market Outlook<br>- Performance Highlight<br>- Credit Highlight<br>- Likuiditas<br>- DPK<br>- Pemantauan Risiko Pasar<br>- Pemantauan Risiko Likuiditas<br>- Deposan Inti<br>- NII<br>- Market Outlook<br>- Performance Highlight<br>- Credit Highlight<br>- Liquidity<br>- DPK<br>- Market Risk Monitoring<br>- Liquidity Risk Monitoring<br>- Core Depositors<br>- NII |
| 26 Februari 2024<br>February 26, 2024 | - Market Outlook<br>- Performance Highlight<br>- Credit Highlight<br>- Likuiditas<br>- DPK<br>- Pemantauan Risiko Pasar<br>- Pemantauan Risiko Likuiditas<br>- Deposan Inti<br>- NII<br>- Market Outlook<br>- Performance Highlight<br>- Credit Highlight<br>- Liquidity<br>- DPK<br>- Market Risk Monitoring<br>- Liquidity Risk Monitoring<br>- Core Depositors<br>- NII |

| Tanggal<br>Date | Agenda |
|---|---|
| 25 Maret 2024<br>March 25, 2024 | - Market Outlook<br>- Performance Highlight<br>- Credit Highlight<br>- Likuiditas<br>- DPK<br>- Pemantauan Risiko Pasar<br>- Pemantauan Risiko Likuiditas<br>- Deposan Inti<br>- NII<br>- Market Outlook<br>- Performance Highlight<br>- Credit Highlight<br>- Liquidity<br>- DPK<br>- Market Risk Monitoring<br>- Liquidity Risk Monitoring<br>- Core Depositors<br>- NII |
| 22 April 2024<br>April 22, 2024 | - Market Outlook<br>- Performance Highlight<br>- Credit Highlight<br>- Likuiditas<br>- DPK<br>- Pemantauan Risiko Pasar<br>- Pemantauan Risiko Likuiditas<br>- Deposan Inti<br>- NII<br>- Market Outlook<br>- Performance Highlight<br>- Credit Highlight<br>- Liquidity<br>- DPK<br>- Market Risk Monitoring<br>- Liquidity Risk Monitoring<br>- Core Depositors<br>- NII |
| 20 Mei 2024<br>May 20, 2024 | - Market Outlook<br>- Performance Highlight<br>- Credit Highlight<br>- Likuiditas<br>- DPK<br>- Pemantauan Risiko Pasar<br>- Pemantauan Risiko Likuiditas<br>- Deposan Inti<br>- NII<br>- Market Outlook<br>- Performance Highlight<br>- Credit Highlight<br>- Liquidity<br>- DPK<br>- Market Risk Monitoring<br>- Liquidity Risk Monitoring<br>- Core Depositors<br>- NII |
| 24 Juni 2024<br>June 24 2024 | - Market Outlook<br>- Performance Highlight<br>- Credit Highlight<br>- Likuiditas<br>- DPK<br>- Pemantauan Risiko Pasar<br>- Pemantauan Risiko Likuiditas<br>- Deposan Inti<br>- NII<br>- Market Outlook<br>- Performance Highlight<br>- Credit Highlight<br>- Liquidity<br>- DPK<br>- Market Risk Monitoring<br>- Liquidity Risk Monitoring<br>- Core Depositors<br>- NII |

| Tanggal<br>Date | Agenda |
|---|---|
| 24 Juli 2024<br>July 24, 2024 | - Market Outlook<br>- Performance Highlight<br>- Credit Highlight<br>- Likuiditas<br>- DPK<br>- Pemantauan Risiko Pasar<br>- Pemantauan Risiko Likuiditas<br>- Deposan Inti<br>- NII<br>- Market Outlook<br>- Performance Highlight<br>- Credit Highlight<br>- Liquidity<br>- DPK<br>- Market Risk Monitoring<br>- Liquidity Risk Monitoring<br>- Core Depositors<br>- NII |
| 26 Agustus 2024<br>August 26, 2024 | - Market Outlook<br>- Performance Highlight<br>- Credit Highlight<br>- Likuiditas<br>- DPK<br>- Pemantauan Risiko Pasar<br>- Pemantauan Risiko Likuiditas<br>- Deposan Inti<br>- NII<br>- Market Outlook<br>- Performance Highlight<br>- Credit Highlight<br>- Liquidity<br>- DPK<br>- Market Risk Monitoring<br>- Liquidity Risk Monitoring<br>- Core Depositors<br>- NII |
| 23 September 2024<br>September 23, 2024 | - Market Outlook<br>- Performance Highlight<br>- Credit Highlight<br>- Likuiditas<br>- DPK<br>- Pemantauan Risiko Pasar<br>- Pemantauan Risiko Likuiditas<br>- Deposan Inti<br>- NII<br>- Market Outlook<br>- Performance Highlight<br>- Credit Highlight<br>- Liquidity<br>- DPK<br>- Market Risk Monitoring<br>- Liquidity Risk Monitoring<br>- Core Depositors<br>- NII |
| 21 Oktober 2024<br>October 21, 2024 | - Market Outlook<br>- Performance Highlight<br>- Credit Highlight<br>- Likuiditas<br>- DPK<br>- Pemantauan Risiko Pasar<br>- Pemantauan Risiko Likuiditas<br>- Deposan Inti<br>- NII<br>- Suku Bunga Dasar Kredit<br>- Market Outlook<br>- Performance Highlight<br>- Credit Highlight<br>- Liquidity<br>- DPK<br>- Market Risk Monitoring<br>- Liquidity Risk Monitoring<br>- Core Depositors<br>- NII<br>- Basic Credit Interest Rate |

| Tanggal<br>Date | Agenda |
|---|---|
| 25 November 2024<br>November 25, 2024 | - Market Outlook<br>- Performance Highlight<br>- Credit Highlight<br>- Likuiditas<br>- DPK<br>- Pemantauan Risiko Pasar<br>- Pemantauan Risiko Likuiditas<br>- Deposan Inti<br>- NII<br>- Suku Bunga Dasar Kredit<br>- Market Outlook<br>- Performance Highlight<br>- Credit Highlight<br>- Liquidity<br>- DPK<br>- Market Risk Monitoring<br>- Liquidity Risk Monitoring<br>- Core Depositors<br>- NII<br>- Basic Credit Interest Rate |





## Pelaksanaan Tugas dan Tanggung Jawab Tahun 2024

Sepanjang tahun 2024, ALCO Bank Sinarmas telah melaksanakan tugas dan tanggung jawab sebagai berikut.

1. Memacu pertumbuhan portofolio pinjaman pada beberapa produk kunci.
2. Memastikan tingkat likuiditas Bank selalu berada pada level yang optimum.
3. Melakukan pemantauan atas strategi *pricing* pendanaan secara aktif dengan mempertimbangkan tingkat kebutuhan pendanaan, kondisi dan kompetisi di pasar serta tingkat *pricing* pendanaan yang ditetapkan oleh regulator.
4. Menjaga kondisi likuiditas Bank secara stabil dengan tetap meningkatkan pendapatan Bank sesuai dengan Rencana Bisnis Bank yang telah di tetapkan di tahun 2023.
5. Menjaga rasio-rasio regulator tetap berada dalam batasan yang telah di tetapkan oleh regulator, yaitu LCR, NSFR, (ΔEVE, AL NCD, GWM, PLM, rasio deposan inti, RIM, dan lain-lain.
6. Melakukan investasi pada portofolio yang memiliki risiko rendah namun tetap dapat menghasilkan pendapatan yang maksimal.
7. Menetapkan strategi terkait penetapan suku bunga dasar sebagai acuan dalam melakukan intermediasi dengan menyalurkan kredit serta mendapat pendanaan agar dapat tetap bersaing di pasar perbankan.
8. Mengkaji serta menyetujui beberapa kebijakan dan metodologi terkait likuiditas, seperti standar operasional prosedur *contingency funding* plan, SK terkait ALCO, parameter CFP, testing terkait CFP dan PLJP, dan lain-lain.
9. Melakukan pemantauan terkait kinerja Bank secara keseluruhan dalam hal pencapaian dari sisi kredit, pendanaan, *cost of fund* (COF), *non-performing loan* (NPL), *net interest margin* (NIM), *dan core* funding secara berkala sebulan sekali.
10. Memperhatikan market outlook secara global, makro dan mikro ekonomi serta internal dalam rangka menetapkan strategi Bank ke depan serta pengaruh portofolio investasi yang dimiliki atas iklim ekonomi secara keseluruhan.

## Implementation of Duties and Responsibilities in 2024

Throughout 2024, ALCO Bank Sinarmas has carried out the following duties and responsibilities.

1. Stimulating the growth of the loan portfolio in several key products.
2. Ensuring that the Bank's liquidity level is always at an optimum level.
3. Actively monitoring funding pricing strategies by considering the level of funding needs, conditions and competition in the market, and the funding pricing level set by the regulator.
4. Maintaining the Bank's liquidity condition stably by continuing to increase the Bank's income in accordance with the Bank's Business Plan that has been set in 2023.
5. Maintaining regulatory ratios within the limits set by the regulator, namely LCR, NSFR, (ΔEVE, AL NCD, GWM, PLM, core depositor ratio, RIM, and others.
6. Investing in portfolios that have low risk but can still generate maximum income.
7. Determining strategies related to determining the base interest rate as a reference in intermediating by distributing credit and obtaining funding in order to remain competitive in the banking market.
8. Reviewing and approving several policies and methodologies related to liquidity, such as standard operating procedures for contingency funding plans, decrees related to ALCO, CFP parameters, testing related to CFP and PLJP, and others.
9. Monitoring the Bank's overall performance in terms of achievements in terms of credit, funding, cost of funds (COF), non-performing loans (NPL), net interest margin (NIM), and core funding periodically once a month.
10. Pay attention to the global, macro and micro economic and internal market outlook in order to determine the Bank's future strategy and the influence of the investment portfolio owned on the overall economic climate.

## KOMITE *HUMAN CAPITAL*

Komite *Human Capital* dibentuk oleh Direksi untuk mendukung pelaksanaan tugas dan tanggung jawab di bidang sumber daya manusia. Komite ini berperan dalam menjaga independensi dan penerapan prinsip manajemen risiko dalam pengambilan keputusan terkait promosi, mutasi, demosi, dan pengunduran diri untuk karyawan setingkat *department head* ke atas.

### Pedoman Kerja

Komite Human Capital menjalankan tugas tanggung jawabnya dengan berpedoman pada Surat Keputusan No. SK.032/2023/PRESDIR-HCSS tentang Susunan dan Wewenang *Human Capital Committee*.

### Struktur dan Komposisi

Struktur dan komposisi Komite *Human Capital* berdasarkan Surat Keputusan No. SK.032/2023/PRESDIR-HCSS tentang Susunan dan Wewenang *Human Capital Committee*, diungkapkan sebagai berikut.

## HUMAN CAPITAL COMMITTEE

The Human Capital Committee was formed by the Board of Directors to support the implementation of duties and responsibilities in the field of human resources. This committee plays a role in maintaining independence and implementing risk management principles in decision-making related to promotions, transfers, demotions, and resignations for employees at the department head level and above.

### Work Guidelines

The Human Capital Committee carries out its duties and responsibilities by referring to Decree No. SK.032/2023/PRESDIR-HCSS concerning the Composition and Authorities of the Human Capital Committee.

### Structure and Composition

The structure and composition of the Human Capital Committee based on Decree No. SK.032/2023/PRESDIR-HCSS concerning the Composition and Authorities of the Human Capital Committee, are disclosed as follows.

| Jabatan dalam Komite<br>Positions in the Committee | Pelaksana<br>Manager | Hak Suara<br>Voting Rights |
|---|---|---|
| Ketua<br>Chairman | Direktur Utama<br>President Director | √ |
| Anggota<br>Member | Direktur yang membawahi unit kerja terkait dengan perihal yang diputuskan<br>Director in charge of work unit related to the matter decided | √ |
| Anggota<br>Member | Direktur yang membawahi bidang Sumber Daya Manusia<br>Director in charge of Human Resources | √ |
| Anggota<br>Member | Pejabat Eksekutif tertinggi yang membawahi bidang Sumber Daya Manusia<br>Highest Executive Officer in charge of Human Resources | √ |
| Sekretaris<br>Secretary | *Human Capital Process & Performance Management Division Head* | x |

### Pernyataan Independensi

Bank menjamin bahwa seluruh anggota Komite *Human Capital* bertindak secara independen dan tidak menerima/melakukan intervensi dari/kepada pihak lainnya. Komite *Human Capital* juga tidak memiliki kepentingan serta keterkaitan yang bersifat pribadi yang berpotensi menimbulkan benturan kepentingan (*conflict of interest*) dengan Bank.

### Tugas dan Tanggung Jawab

Tugas dan tanggung jawab Komite *Human Capital*, yakni:

1. Memutuskan promosi, mutasi, dan demosi untuk karyawan dengan jabatan setingkat Division Head atau lebih tinggi, dan jabatan Sub Branch Manager.
2. Memutuskan pengunduran diri bagi Pejabat Eksekutif.

### Independence Statement

The Bank ensures that all members of the Human Capital Committee act independently and do not accept or engage in any form of intervention from or toward other parties. The Human Capital Committee also has no personal interests or affiliations that could potentially give rise to a conflict of interest with the Bank.

### Duties and Responsibilities

The duties and responsibilities of the Human Capital Committee include:

1. Making decisions on promotions, transfers, and demotions for employees holding positions equivalent to Division Head or higher, as well as for Sub-Branch Manager positions.
2. Deciding on resignations submitted by Executive Officers.

## Rapat

### Kebijakan

Rapat Komite Human Capital wajib diselenggarakan apabila terdapat permasalahan terkait dengan sumber daya manusia yang membutuhkan keputusan mendesak. Namun, rapat hanya dapat dilaksanakan apabila dihadiri oleh paling kurang 2/3 dari jumlah anggota Komite.

### Frekuensi dan Kehadiran

Sepanjang tahun 2024, 2 (dua) kali pelaksanaan rapat Komite Human Capital.

## Meetings

### Policy

Meetings of the Human Capital Committee must be convened when there are human capital-related issues that require urgent decisions. However, meetings can only proceed if at least two-thirds of the Committee members are present.

### Frequency and Attendance

Throughout 2024, the Human Capital Committee held a total of 2 (two) meetings.

| Jabatan<br>Position | Jumlah Rapat<br>Number of Meetings | Jumlah Kehadiran<br>Number of Attendance | Frekuensi/Tingkat Kehadiran (%)<br>Frequency/Attendance Rate (%) |
|---|---|---|---|
| Direktur Utama<br>President Director | 2 | 2 | 100 |
| Direktur yang membawahi unit kerja terkait dengan perihal yang diputuskan<br>Director in charge of work unit related to subject of the decision | 2 | 2 | 100 |
| Direktur yang membawahi bidang Sumber Daya Manusia<br>Director in charge of Human Resources | 2 | 2 | 100 |
| Pejabat Eksekutif tertinggi yang membawahi bidang Sumber Daya Manusia<br>Highest Executive Officer in charge of Human Resources | 2 | 2 | 100 |
| *Human Capital Process & Performance Management Division Head* | 2 | 2 | 100 |

### Agenda

| Tanggal<br>Date | Agenda |
|---|---|
| 2024 | Pembahasan Promosi – Mutasi Karyawan<br>Discussion on Promotion– Employee Transfer |
| 2024 | Pembahasan Pengunduran diri PE<br>Discussion on PE Resignation |

## Pelaksanaan Tugas dan Tanggung Jawab Tahun 2024

Sepanjang tahun 2024, Komite Human Capital telah membuat 68 keputusan.

## Implementation of Duties and Responsibilities in 2024

Throughout 2024, the Human Capital Committee has made 68 decisions.

# SEKRETARIS PERUSAHAAN
## Corporate Secretary



Sekretaris Perusahaan merupakan organ pendukung Direksi yang memiliki tanggung jawab untuk menjamin kelancaran hubungan antarorgan Bank, menjaga hubungan yang baik antara Bank dan pemangku kepentingan, serta memastikan kepatuhan terhadap ketentuan peraturan perundang-undangan yang berlaku.

### Pedoman Kerja

Sekretaris Perusahaan menjalankan tugas tanggung jawabnya dengan berpedoman pada Peraturan Otoritas Jasa Keuangan No. 35/POJK.04/2014 tentang Sekretaris Perusahaan Emiten atau Perusahaan Publik dan Anggaran Dasar Bank.

### Struktur Sekretaris Perusahaan

Dalam susunan organisasi Bank, Sekretaris Perusahaan bertanggung jawab langsung kepada Direktur Utama. Peran Sekretaris Perusahaan mencakup sejumlah fungsi, termasuk:

1. Memastikan Bank sebagai perusahaan terbuka, melaksanakan tata kelola perusahaan khususnya terkait dengan pasar modal;
2. Stakeholder Management;
3. Komunikasi Korporasi;
4. Kesekretariatan;
5. Corporate Social Responsibility; dan
6. Board Support.

The Corporate Secretary is a supporting organ of the Board of Directors responsible for ensuring smooth coordination among the Bank's organs, maintaining good relations between the Bank and its stakeholders, and ensuring compliance with prevailing laws and regulations.

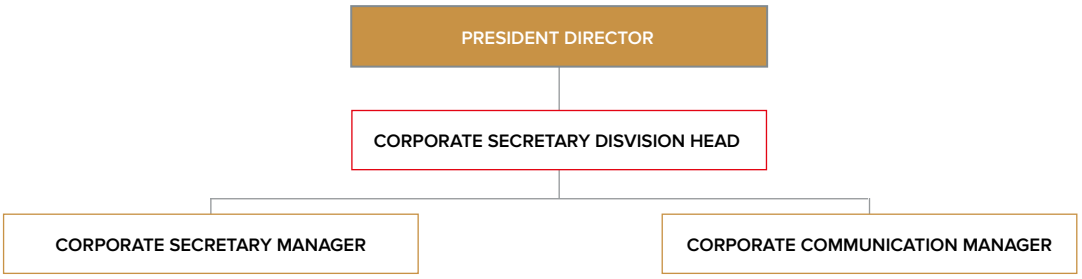
### Work Guidelines

The Corporate Secretary carries out their duties and responsibilities based on the provisions of the Financial Services Authority Regulation No. 35/POJK.04/2014 concerning Corporate Secretaries of Issuers or Public Companies and the Bank's Articles of Association.

### Corporate Secretary Structure

In the Bank's organizational structure, the Corporate Secretary is directly responsible to the President Director. The role of the Corporate Secretary includes a number of functions, including:

1. Ensuring that the Bank, as a public company, implements corporate governance, especially related to the capital market;
2. Stakeholder Management;
3. Corporate Communication;
4. Secretariat;
5. Corporate Social Responsibility; and
6. Board Support.



## Profil Sekretaris Perusahaan

## Corporate Secretary Profile



**Retno Tri Wulandari**
Sekretaris Perusahaan
Corporate Secretary

**Kewarganegaraan | Citizenship**
Indonesia

**Domisili | Domicile**
Jakarta

**Usia | Age**
40 tahun | years old

**Dasar Hukum Pengangkatan**
**Legal Basis for Appointment**

Surat keputusan Direksi No. SK.015/2017/PRESDIR tanggal 16 Maret 2017.
Board of Directors Decree No. SK.015/2017/PRESDIR dated March 16, 2017.

**Riwayat Pendidikan | Educational Background**
Sarjana Akuntansi, STEKPI Jakarta (2005).
Bachelor of Accounting, STEKPI Jakarta (2005).

**Riwayat Pekerjaan | Work Experience**
- Personal Assistance to President Director & Risk Management Human Capital Director PT. Bank Sinarmas Tbk. (2014-1017);
- Personal Assistance to Compliance Director PT Bank Internasional Indonesia (BII) Tbk (2014); dan
- Compliance Assistance ABN AMRO Bank NV/RBS (2005-2010).
- Personal Assistance to President Director & Risk Management Human Capital Director of PT. Bank Sinarmas Tbk. (2014-1017);
- Personal Assistance to Compliance Director of PT Bank Internasional Indonesia (BII) Tbk (2014); and
- Compliance Assistance ABN AMRO Bank NV/RBS (2005-2010).

**Rangkap Jabatan | Concurrent Position**
Tidak merangkap jabatan, baik pada bank, perusahaan, dan/atau lembaga lain.
Does not hold concurrent positions, either in banks, companies, and/or other institutions.

**Hubungan Afiliasi | Affiliated Relationship**
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.
Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders.

## Tugas dan Tanggung Jawab

Tugas dan tanggung jawab Sekretaris Perusahaan Bank Sinarmas diuraikan sebagai berikut.

1. Mengikuti perkembangan pasar modal, khususnya peraturan perundang-undangan yang berlaku di bidang pasar modal.
2. Memberikan masukan kepada Direksi dan Dewan Komisaris Bank untuk mematuhi ketentuan peraturan perundang-undangan di bidang pasar modal.
3. Membantu Direksi dan Dewan Komisaris dalam pelaksanaan tata kelola perusahaan yang meliputi:
   a. Keterbukaan informasi kepada masyarakat, termasuk ketersediaan informasi pada situs web Bank;
   b. Penyampaian laporan kepada Otoritas Jasa Keuangan tepat waktu;
   c. Penyelenggaraan dan dokumentasi RUPS;
   d. Penyelenggaraan dan dokumentasi Rapat Direksi dan/atau Dewan Komisaris; dan
   e. Pelaksanaan program orientasi terhadap perusahaan bagi Direksi dan/atau Dewan Komisaris.
4. Sebagai penghubung antara Bank dengan Pemegang Saham, Otoritas Jasa Keuangan, dan pemangku kepentingan lainnya.

## Duties and Responsibilities

The duties and responsibilities of the Corporate Secretary of Bank Sinarmas are outlined as follows.

1. Following developments in the capital market, especially laws and regulations in force in the capital market sector.
2. Providing input to the Board of Directors and Board of Commissioners of the Bank to comply with the provisions of laws and regulations in the capital market sector.
3. Assisting the Board of Directors and Board of Commissioners in implementing corporate governance, which includes:
   a. Disclosure of information to the public, including the availability of information on the Bank's website;
   b. Submission of reports to the Financial Services Authority on time;
   c. Organizing and documenting GMS;
   d. Organizing and documenting Board of Directors and/or Board of Commissioners Meetings; and
   e. Implementing orientation programs for the company for the Board of Directors and/or Board of Commissioners.
4. As a liaison between the Bank and Shareholders, the Financial Services Authority, and other stakeholders.

## Pengembangan Kompetensi Sekretaris Perusahaan

Bank Sinarmas memfasilitasi Sekretaris Perusahaan untuk mengikuti berbagai program pengembangan kompetensi. Langkah ini dilakukan untuk memastikan Sekretaris Perusahaan memiliki kompetensi yang diperlukan untuk menjalankan perannya secara efektif dalam mendukung kesuksesan dan keberlanjutan Bank.

Informasi mengenai program pengembangan kompetensi Sekretaris Perusahaan pada tahun 2024 diungkapkan sebagai berikut.

## Corporate Secretary Competency Development

Bank Sinarmas facilitates the Corporate Secretary to participate in various competency development programs. This step is taken to ensure that the Corporate Secretary has the necessary competencies to carry out his/her role effectively in supporting the success and sustainability of the Bank.

Information regarding the Corporate Secretary competency development program in 2024 is disclosed as follows.

| Materi Pengembangan Kompetensi<br>Competency Development Material | Tempat/Tanggal<br>Venue/Date | Penyelenggara<br>Organizer |
|---|---|---|
| Togather, Excelllence, Action & Mission Working Life | Simas Plaza, Jakarta/26 Januari 2024<br>Simas Plaza, Jakarta/January 26, 2024 | BSIM |
| Sertifikasi UKMR jenjang 5<br>UKMR Certification Level 5 | Zoom Meetings/26-27 Februari 2024<br>Zoom Meetings/February 26-27, 2024 | BSMR |
| Meningkatkan Efektivitas Penerapan Management Risiko untuk mewujudkan Industri Perbankan yang berkelanjutan<br>Improving the Effectiveness of Risk Management Implementation to Realize a Sustainable Banking Industry | Zoom Meetings/19 Maret 2024<br>Zoom Meetings/March 19, 2024 | Perbans |
| ESG Investing "What is it and why do investors care about it" | Zoom Meetings/25 April 2024<br>Zoom Meetings/April 25, 2024 | Bursa Efek Indonesia |
| Master Strategic Business Analysis Planning & Organizing | Amanuba Hotel, Bogor/9-10 Agustus 2024<br>Amanuba Hotel, Bogor/August 9-10, 2024 | Business Wisdom Institute |
| Service Quality Professional Grooming | 5G Resort, Bogor/29 November 2024<br>5G Resort, Bogor/November 29, 2024 | IIRC |

## Pelaksanaan Tugas dan Tanggung Jawab Tahun 2024

Sepanjang tahun 2024, Sekretaris Perusahaan telah melaksanakan tugas dan tanggung jawab sebagai berikut.

1. Mengikuti perkembangan pasar modal, khususnya terkait dengan peraturan perundang-undangan yang berlaku di bidang pasar modal.
2. Memberikan masukan kepada Direksi dan Dewan Komisaris Bank untuk mematuhi ketentuan peraturan perundang-undangan di bidang pasar modal.
3. Membantu Direksi dan Dewan Komisaris dalam pelaksanaan tata kelola perusahaan yang meliputi:
   a. Keterbukaan informasi kepada masyarakat, termasuk ketersediaan informasi pada situs *web* Bank;
   b. Penyampaian laporan kepada Otoritas Jasa Keuangan tepat waktu;
   c. Penyelenggaraan dan dokumentasi RUPS;
   d. Penyelenggaraan dan dokumentasi rapat Direksi dan/atau Dewan Komisaris; dan
   e. Pelaksanaan program orientasi terhadap perusahaan bagi Direksi dan/atau Dewan Komisaris.
4. Sebagai penghubung antara Bank dengan Pemegang Saham, Otoritas Jasa Keuangan, dan pemangku kepentingan lainnya.

## Implementation of Duties and Responsibilities in 2024

Throughout 2024, the Corporate Secretary has carried out the following duties and responsibilities.

1. Following developments in the capital market, especially related to applicable laws and regulations in the capital market sector.
2. Providing input to the Board of Directors and Board of Commissioners of the Bank to comply with the provisions of laws and regulations in the capital market sector.
3. Assisting the Board of Directors and Board of Commissioners in implementing corporate governance, which includes:
   a. Disclosure of information to the public, including the availability of information on the Bank's website;
   b. Submission of reports to the Financial Services Authority on time;
   c. Organizing and documenting GMS;
   d. Organizing and documenting meetings of the Board of Directors and/or Board of Commissioners; and
   e. Implementing orientation programs for the company for the Board of Directors and/or Board of Commissioners.
4. As a liaison between the Bank and Shareholders, the Financial Services Authority, and other stakeholders.

## Aktivitas Komunikasi Korporasi

Sepanjang tahun 2024, Sekretaris Perusahaan telah melakukan aktivitas komunikasi dengan para pemangku kepentingan melalui berbagai saluran komunikasi, sebagai berikut.

## Corporate Communication Activities

Throughout 2024, the Corporate Secretary has conducted communication activities with stakeholders through various communication channels, as follows.

| No. | Tanggal<br>Date | Tempat<br>Venue | Event Korporasi<br>Corporate Event |
|---|---|---|---|
| 1 | 2 Januari 2024<br>January 2, 2024 | Branch Nanobank Syariah, Menteng, Jakarta | Sipnoff Bank Nano Syariah |
| 2 | 26 Januari 2024<br>January 26, 2024 | Ballroom Simas Plasa, Jakarta | Sambutan Awal Tahun Manajemen dan Townhall Q1 Bank Sinarmas<br>Early Year Greetings from Management and Q1 Townhall Bank Sinarmas |
| 3 | 30 Januari 2024<br>January 30, 2024 | Green Office Park 1, BSD Tangerang | Pengundian Lucky Draw Simas Digi<br>Simas Digi Lucky Draw |
| 4 | 31 Januari 2024<br>January 31, 2024 | The Grand Mansion, Menteng, Jakarta | Workshop Internal Audit Group<br>Internal Audit Group Workshop |
| 5 | 1-31 Desember 2024<br>December 1-31, 2024 | Nasional | Kegiatan Bank Goes to School yang dilaksanakan sebanyak 358 kegiatan di sekolah yg telah bekerjasama<br>Bank Goes to School activities carried out in 358 activities at schools that have collaborated |
| 6 | Januari, November, Desember 2024<br>January, November, December 2024 | Jakarta, Surabaya, Makassar | Program Arisan Bank Sinarmas Prioritas sebanyak 24 Batch<br>Bank Sinarmas Priority Arisan Program in 24 Batche |
| 7 | 18 Februari 2024<br>February 18, 2024 | TBM Lentera Pustaka, Desa Sukaluyu, Bogor, Jawa Barat | Pembukaan Tabungan SimPel kepada 20 anak pembaca aktif TBM Lentera Pustaka, Penyerahan tas sekolah Tzu Chi, donasi 5 perangkat komputer literasi digital, dan peluncuran motor baca Simobi+<br>Opening of SimPel Savings for 20 active children of TBM Lentera Pustaka readers, Handover of Tzu Chi school bags, donation of 5 digital literacy computer devices, and launch of Simobi+ reading motorbike |
| 8 | 23 Februari 2024<br>February 23, 2024 | Desa Petak, Gianyar, Bali | Pembukaan Program CSR Berkelanjutan Diseminasi Olah Limbah Peternakan dan Sampah Organik Basis Teknologi Konsorsium MOL Bio Taro Untuk Pangan Sehat di Kabupaten Gianyar, Bali<br>Opening of Sustainable CSR Program Dissemination of Livestock Waste Processing and Organic Waste Based on MOL Bio Taro Consortium Technology for Healthy Food in Gianyar Regency, Bali |
| 9 | 29 Februari 2024<br>February 29, 2024 | Roxy Square Lantai 9, Jakarta | Pelatihan Relawan Abu Putih Tzu Chi cabang Bank Sinarmas<br>Training of Tzu Chi White Ash Volunteers at Bank Sinarmas Branch |
| 10 | 13 Maret 2024<br>March 13, 2024 | GBI Roxy Square lantai 6, Jakarta | Donor Darah Bank Sinarmas<br>Bank Sinarmas Blood Donation |
| 11 | 15 Maret 2024<br>March 15, 2024 | Bank Indonesia, Jakarta | Kick Off Serambi 2024 |
| 12 | 22 Maret 2024<br>March 22, 2024 | Roxy Square lantai 9, Jakarta | Buka Puasa Bersama Bank Sinarmas<br>Breaking Fast Together with Bank Sinarmas |
| 13 | 26 Maret 2024<br>March 26, 2024 | Area Sekitar Roxy Square, Jakarta dan Sinarmas Land Plaza Thamrin, Jakarta | Takjil Berkah Ramadan<br>Blessing of Ramadan Takjil |
| 14 | 28 Maret 2024<br>March 28, 2024 | TBM Lentera Pustaka, Bogor | Buka Puasa Bersama TBM Lentera Pustaka, Bogor<br>Breaking Fast Together with TBM Lentera Pustaka, Bogor |
| 15 | 16 Mei 2024<br>May 16, 2024 | Sinar Mas Land Plaza, Tower 2 lt.39, Jakarta | Rapat Umum Pemegang Saham Tahunan(RUPST) PT Bank Sinarmas<br>Annual General Meeting of Shareholders (AGMS) of PT Bank Sinarmas |
| 16 | 2 Juni 2024<br>June 2, 2024 | TBM Lentera Pustaka, Desa Sukaluyu, Bogor, Jawa Barat | "Creative Expression for Social Impact" with Bank Sinarmas Crafters Community - Shibori |
| 17 | 11 Juni 2024<br>June 11, 2024 | Restoran Bunga Rampai, Jakarta | Product Launching Reksa Dana Indeks Sri Kehati<br>Product Launching of Sri Kehati Index Mutual Fund |
| 18 | 14 Juni 2024<br>June 14, 2024 | Inews Tower, Jakarta | Penyerahan Hewan Kurban ke MNC Peduli<br>Submission of Qurban Animals to MNC Peduli |
| 19 | 18 Juni 2024<br>June 18, 2024 | TBM Lentera Pustaka, Desa Sukaluyu, Bogor, Jawa Barat | Penyerahan Hewan Kurban ke TBM Lentera Pustaka<br>Submission of Qurban Animals to TBM Lentera Pustaka |
| 20 | 20 Juni 2024<br>June 20, 2024 | Sinarmas Land Plaza Thamrin, Roxy Square | Penuangan Celengan Tzu Chi Bank Sinarmas<br>Pouring of Tzu Chi Piggy Banks of Bank Sinarmas |

| No. | Tanggal<br>Date | Tempat<br>Venue | Event Korporasi<br>Corporate Event |
|---|---|---|---|
| 21 | 19 Juli 2024<br>July 19, 2024 | Bursa Efek Indonesia, Jakarta | Penandatanganan Perjanjian Kerjasama antara PT kustodian Sentral Efek Indonesia dengan Bank Administrator RDN-Bank Pembayaran periode 2024-2029<br>Signing of Cooperation Agreement between PT Kustodian Sentral Efek Indonesia and RDN Administrator Bank-Bank Payment period 2024-2029 |
| 22 | 22 Juli 2024<br>July 22, 2024 | GBI Roxy Square lantai 6, Jakarta | Donor Darah Bank Sinarmas<br>Bank Sinarmas Blood Donation |
| 23 | 31 Juli 2024<br>July 31, 2024 | Green Office Park 1, BSD Tangerang | Pengundian Tahap 1 - Program Lucky Draw Cuan-tastic Bank Sinarmas 2024<br>Phase 1 Draw - Bank Sinarmas Cuan-tastic Lucky Draw Program 2024 |
| 24 | 2 Agustus 2024<br>August 2, 2024 | JCC, Jakarta | Kerjasama Quick Response Code Indonesian Standard (QRIS) antara Bank Sinarmas dan ALTO<br>Quick Response Code Indonesian Standard (QRIS) Cooperation between Bank Sinarmas and ALTO |
| 25 | 3 Agustus 2024<br>August 3, 2024 | JCC, Jakarta | Talkshow: The Rise of NFC Payment: Revolutionizing Payments in Indonesia |
| 26 | 6 Agustus 2024<br>August 6, 2024 | Telkom Landmark Tower, Jakarta | Signing Ceremony Loan Facility Agreement Telkomsel |
| 27 | 10 Agustus 2024<br>August 10, 2024 | Grand Ballroom Mulia Hotel, Jakarta | Sinarmas Wealth Concord Gala |
| 28 | 18 Agustus 2024<br>August 18, 2024 | Orion Sport, Jakarta | 35 Tahun Melaju Bersama<br>35 Years of Moving Forward Together |
| 29 | 25 Agustus 2024<br>August 25, 2024 | TBM Lentera Pustaka, Desa Sukaluyu, Bogor, Jawa Barat | Bakti Sosial: Donasi Beras dan Pemeriksaan Kesehatan Gratis bersama Tzu Chi cabang Bank Sinarmas<br>Social Service: Rice Donation and Free Health Check-up with Tzu Chi branch of Bank Sinarmas |
| 30 | 30 Agustus 2024<br>August 30, 2024 | | Townhal Q2 Bank Sinarmas |
| 31 | 4 September 2024<br>September 4, 2024 | Seluruh Kantor Cabang Bank Sinarmas | Hari Pelanggan Nasional<br>National Customer Day |
| 32 | 18 September 2024<br>September 18, 2024 | The Grand Mansion, Jakarta | AI Day “Explore Beyond The Stars” |
| 33 | 25 September 2024<br>September 25, 2024 | Kolong Jembatan Lodan Raya, Jakarta Utara | Bakti Sosial: Donasi Beras dan Alat Sekolah bersama Tzu Chi cabang Bank Sinarmas<br>Social Service: Donation of Rice and School Supplies with Tzu Chi Branch of Bank Sinarmas |
| 34 | 27 September 2024<br>September 27, 2024 | ICE Bsd, Tangerang | Digital Day<br>Talkwhow: “Empowering Business Through Digital Transformation” |
| 35 | 30 September 2024<br>September 30, 2024 | Menar BP Jamsostek | Penandatanganan Perjanjian Kerja Sama Antara PLN, PLN Icon Plus dengan Bank dan Pos Tentang Pengelolaan Dana atas Penyesuaian Sistem P2APST<br>Signing of Cooperation Agreement Between PLN, PLN Icon Plus with Banks and Post Offices Regarding Management of Funds for Adjustment of P2APST System |
| 36 | 2-3 Oktober 2024<br>October 2-3, 2024 | Sinarmas Land Plaza, Thamrin, Jakarta | Tijpta UMKM Fair |
| 37 | 18 Oktober 2024<br>October 18, 2024 | Desa Petak | Panen Raya di Lahan Uji Coba, Petak Gianyar, Bali<br>Tanam Pangan Sehat Basis Teknologi Konsorsium MOL Biopetak dengan Pemanfaatan Sampah Organik dan Limbah Peternakan menjadi Media Tanam Seketika<br>Big Harvest in Trial Land, Petak Gianyar, Bali<br>Healthy Food Planting Based on MOL Biopetak Consortium Technology with Utilization of Organic Waste and Livestock Waste as Instant Planting Media |
| 38 | 28 Oktober 2024<br>October 28, 2024 | Sinarmas Land Plaza lt.39 Tower 2, Jakarta | Rapat Umum Pemegang Saham Luar Biasa Bank Sinarmas<br>Extraordinary General Meeting of Shareholders of Bank Sinarmas |
| 39 | 30 Oktober 2024<br>October 30, 2024 | Green Forest Roxy Square | Pengundian Tahap 2 - Program Lucky Draw Cuan-tastic Bank Sinarmas 2024<br>Phase 2 Drawing - Lucky Draw Cuan-tastic Program Bank Sinarmas 2024 |
| 40 | 4 November 2024<br>November 4, 2024 | GBI Roxy Square lantai 6, Jakarta | Donor Darah Bank Sinarmas<br>Bank Sinarmas Blood Donor |
| 41 | 5-6 November 2024<br>November 5-6, 2024 | Aston Hotel, Grogol, Jakarta | Product Workshop “Raising The Bar & Time Machine |
| 42 | 8 November 2024<br>November 8, 2024 | Grage Hotel, Bengkulu | Sosialisasi dan Pelatihan Bagi UMKM & Nasabah Bank Sinarmas KC Bengkulu<br>Socialization and Training for UMKM & Bank Sinarmas KC Bengkulu Customers |
| 43 | 21 November 2024<br>November 21, 2024 | Sinarmas Land Plaza Thamrin, Roxy Square | Penuangan Celengan Tzu Chi Bank Sinarmas<br>Pouring of Tzu Chi Piggy Bank Bank Sinarmas |
| 44 | 26 November 2024<br>November 26, 2024 | The Grand Mansion, Jakarta | Public Expose Bank Sinarmas |
| 45 | 6 Desember 2024<br>December 6, 2024 | The Grand Mansion, Jakarta | “Pathway To Infinite Memories” Red Diamond Infinte Card Launch |

# SATUAN KERJA AUDIT INTERNAL
## Internal Audit Work Unit

Satuan Kerja Audit Internal (SKAI) berperan sebagai pertahanan lapis ketiga (*third line of defense*) yang bertugas mengawasi dan menilai pengendalian internal melalui pemeriksaan seluruh divisi di Bank Sinarmas. SKAI juga berperan untuk menjaga dan mengamankan kegiatan usaha Bank, serta bertanggung jawab dalam memastikan tercapainya visi dan misi Bank.

The Internal Audit Work Unit (SKAI) acts as a third line of defense tasked with supervising and assessing internal control through audits of all divisions at Bank Sinarmas. SKAI also plays a role in maintaining and securing the Bank's business activities, and is responsible for ensuring the achievement of the Bank's vision and mission.



2024 Performance Highlights
Management Report
Company Profile
Management Discussion and Analysis
Business Support Overview
CORPORATE GOVERNANCE
Sustainability Report

### Piagam Audit Internal

SKAI menjalankan tugas dan tanggung jawab sesuai dengan Piagam Audit Internal Revisi 7.0 yang disahkan melalui SK.004/2024/PRESDIR-IAG tanggal 11 Januari 2024. Piagam tersebut memuat ketentuan terkait:

1. Misi *Internal Audit*;
2. Standar dan Kepatuhan Terhadap Regulasi;
3. Struktur dan Kedudukan *Internal Audit*;
4. Tanggung Jawab dalam Pelaksanaan Fungsi *Internal Audit*;
5. Tugas dan Tanggung Jawab *Internal Audit*;
6. Wewenang *Internal Audit*;
7. Ruang Lingkup Fungsi *Internal Audit*;
8. Tanggung Jawab dan Akuntabilitas *Internal Audit Group Head*;
9. Persyaratan *Internal Auditor*;
10. Larangan Perangkapan Tugas dan Jabatan *Internal Auditor*;
11. Penggunaan Jasa Pihak Eksternal dalam Pelaksanaan *Internal Audit*;
12. Hubungan *Internal Audit* dengan Unit Kerja Pengendalian, Auditor Ekstern, atau Ahli Hukum;
13. Pembatasan Penugasan, Penggunaan Jasa dan *Cooling Off Period*;
14. Kewajiban Pelaporan kepada Otoritas Jasa Keuangan;
15. Kode Etik *Internal Audit*; dan
16. Program Jaminan Kualitas dan Peningkatan Kualitas.

### Internal Audit Charter

SKAI carries out its duties and responsibilities in accordance with the Internal Audit Charter Revision 7.0, which was ratified through SK.004/2024/PRESDIR-IAG dated January 11, 2024. The charter contains provisions related to:

1. Internal Audit Mission;
2. Standards and Compliance with Regulations;
3. Internal Audit Structure and Position;
4. Responsibilities in Implementing Internal Audit Functions;
5. Internal Audit Duties and Responsibilities;
6. Internal Audit Authority;
7. Scope of Internal Audit Functions;
8. Responsibilities and Accountabilities of Internal Audit Group Head;
9. Internal Auditor Requirements;
10. Prohibition on Dual Duties and Positions of Internal Auditors;
11. Use of External Services in the Implementation of Internal Audit;
12. Relationship of Internal Audit with Control Work Unit, External Auditor, or Legal Expert;
13. Restrictions on Assignments, Use of Services and Cooling Off Period;
14. Reporting Obligations to the Financial Services Authority;
15. Internal Audit Code of Ethics; and
16. Quality Assurance and Quality Improvement Program.

### Misi SKAI

Misi SKAI adalah meningkatkan dan melindungi nilai organisasi dengan memberikan *risk-based and objective assurance, advice,* dan *insight*. Internal Audit membantu PT. Bank Sinarmas Tbk. mencapai tujuan dengan pendekatan yang sistematis dan konsisten untuk mengevaluasi serta meningkatkan efektivitas tata kelola, manajemen risiko, maupun proses pengendalian.

### SKAI Mission

SKAI's mission is to enhance and protect the value of the organization by providing risk-based and objective assurance, advice, and insight. Internal Audit helps PT. Bank Sinarmas Tbk. achieve its goals with a systematic and consistent approach to evaluating and improving the effectiveness of governance, risk management, and control processes.

### Struktur dan Kedudukan SKAI

Struktur dan kedudukan SKAI diatur dalam Peraturan Otoritas Jasa Keuangan No.1/POJK.03/2019 tanggal 29 Januari 2019 tentang Penerapan Fungsi Audit Internal pada Bank Umum. SKAI dipimpin oleh Kepala SKAI yang

### Structure and Position of SKAI

The structure and position of SKAI are regulated in Financial Services Authority Regulation No.1/POJK.03/2019 dated January 29, 2019 concerning the Implementation of Internal Audit Functions in Commercial Banks. SKAI is led by the

diangkat dan diberhentikan oleh Direktur Utama, setelah mendapat persetujuan dari Dewan Komisaris dengan mempertimbangkan rekomendasi Komite Audit.

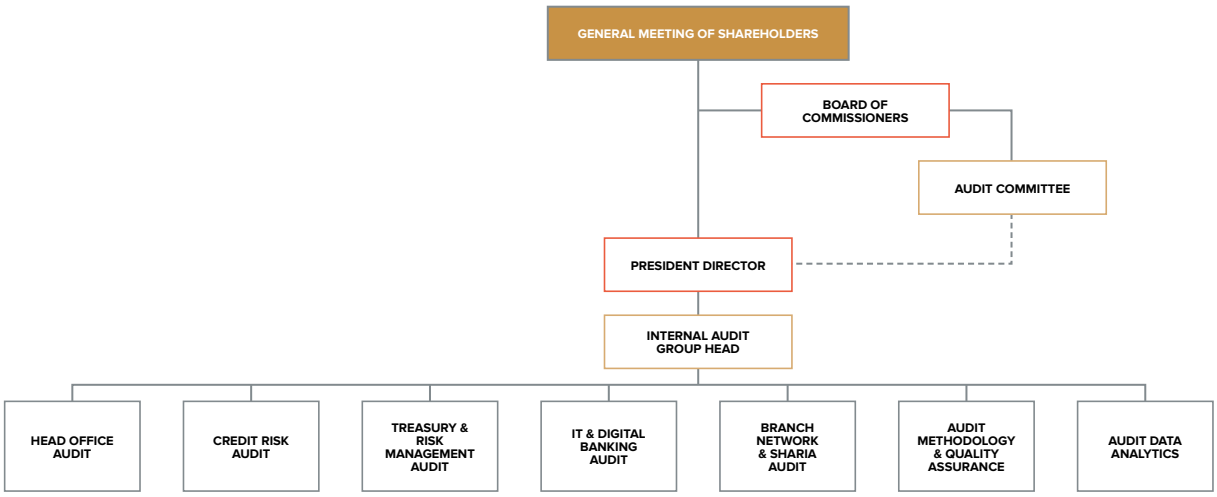
Head of SKAI who is appointed and dismissed by the President Director, after obtaining approval from the Board of Commissioners by considering the recommendations of the Audit Committee.

Kepala SKAI Bank Sinarmas yang menjabat saat ini diangkat melalui Keputusan Direksi No. SK.0240/2021/PRESDIR-HCRS tanggal 26 Januari 2021 dan telah dilaporkan kepada Otoritas Jasa Keuangan melalui Surat SKL.035/2021/PRESDIR tanggal 17 Februari 2021.

The current Head of SKAI of Bank Sinarmas was appointed through Board of Directors Decree No. SK.0240/2021/PRESDIR-HCRS dated January 26, 2021 and has been reported to the Financial Services Authority through Letter SKL.035/2021/PRESDIR dated February 17, 2021.

Kedudukan SKAI dalam struktur organisasi Bank Sinarmas berdasarkan Surat Keputusan No.SK.074/2024/PRESDIR tanggal 28 Oktober 2024, diungkapkan sebagai berikut.

The position of SKAI in the organizational structure of Bank Sinarmas based on Decree No.SK.074/2024/PRESDIR dated October 28, 2024, is disclosed as follows.




Kepala SKAI berkomunikasi langsung dengan Dewan Komisaris atau Komite Audit untuk menyampaikan informasi audit, yang bertujuan mendukung independensi, kelancaran proses, dan wewenang pemantauan tindak lanjut. Manajemen dan Dewan Komisaris memberikan dukungan penuh agar auditor dapat bekerja sama tanpa hambatan dengan *auditee*.

The Head of SKAI communicates directly with the Board of Commissioners or Audit Committee to convey audit information, which aims to support independence, smooth process, and follow-up monitoring authority. Management and the Board of Commissioners provide full support so that auditors can work together without obstacles with auditees.

## Profil Kepala SKAI

## Profile of the Head of SKAI



**Frieda Junia**
Kepala Satuan Kerja Audit Internal
Head of Internal Audit Work Unit

**Kewarganegaraan | Citizenship**
Indonesia

**Domisili | Domicile**
Jakarta

**Usia | Age**
52 tahun | years old

**Dasar Hukum Pengangkatan**
**Legal Basis for Appointment**

Surat Keputusan No. SK.0240/2021/PRESDIR-HCRS tanggal 26 Januari 2021.
Decree No. SK.0240/2021/PRESDIR-HCRS dated January 26, 2021.

**Riwayat Pendidikan | Educational Background**
Sarjana Ekonomi Akuntansi, Universitas Pendidikan Nasional (1996).
Bachelor of Economics in Accounting, Universitas Pendidikan Nasional (1996).

**Riwayat Pekerjaan | Work Experience**
- Country Group Audit Deutsche Bank AG, Jakarta Branch
- (2016-2021);
- Corporate Function Audit Head of Department PT Bank OCBC NISP Tbk (2013-2016);
- Branch Network Audit Team Leader Bank Commonwealth (2012-2013);
- Branch Network Audit Senior Manager Bank Commonwealth (2011-2012);
- Audit Manager Branch and Operation Bank Commonwealth (2010-2011);
- Senior Auditor Bank Commonwealth (2009-2010);
- Regional Operations Manager Bank Commonwealth (2008- 2009);
- Branch Service Manager Bank Commonwealth Bali Branch (2005-2008);
- Royal Resort Bali Business Manager PT Permata Bahari Mandiri (2002-2005);
- Accounts Department Officer PT Permata Bahari Mandiri (1999-2002); dan
- Customer Service Officer PT Bank Internasional Indonesia (BII) Tbk, Denpasar (1996-1999).
- Country Group Audit Deutsche Bank AG, Jakarta Branch (2016-2021);
- Corporate Function Audit Head of Department PT Bank OCBC NISP Tbk (2013-2016);
- Branch Network Audit Team Leader Bank Commonwealth (2012-2013);
- Branch Network Audit Senior Manager Bank Commonwealth (2011-2012);
- Audit Manager Branch and Operation Bank Commonwealth (2010-2011);
- Senior Auditor Bank Commonwealth (2009-2010);
- Regional Operations Manager Bank Commonwealth (2008- 2009);
- Branch Service Manager Bank Commonwealth Bali Branch (2005-2008);
- Royal Resort Bali Business Manager PT Permata Bahari Mandiri (2002-2005);
- Accounts Department Officer PT Permata Bahari Mandiri (1999-2002); and
- Customer Service Officer PT Bank Internasional Indonesia (BII) Tbk, Denpasar (1996-1999).

**Rangkap Jabatan | Concurrent Position**
Tidak merangkap jabatan, baik pada bank, perusahaan, dan/atau lembaga lain.
Does not hold concurrent positions, either in banks, companies, and/or other institutions.

**Sertifikasi Profesi | Professional Certification**
Sertifikasi Manajemen Risiko Level 4.
Risk Management Certification Level 4.

**Hubungan Afiliasi | Affiliated Relationship**
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.
Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders.

## Tugas dan Tanggung Jawab

Tugas dan tanggung jawab SKAI Bank Sinarmas diungkapkan sebagai berikut.

1. Mengusulkan dan mengajukan rencana kerja tahunan *internal audit* berdasarkan risiko dengan mempertimbangkan rekomendasi Komite Audit serta disetujui oleh Direktur Utama dan Dewan Komisaris termasuk mendokumentasikan hasil *risk assessment*, sumber daya manusia, maupun anggaran;
2. Menilai sistem manajemen risiko, pengendalian internal, tata kelola, kepatuhan, keuangan, akuntansi, operasi, dan teknologi informasi yang diterapkan oleh manajemen, dan memastikan bahwa sistem telah memadai, komprehensif, dan efektif;
3. Menilai kepatuhan terhadap hukum dan peraturan yang relevan serta kewajiban kontraktual;
4. Mengkomunikasikan hasil dari penugasan *assurance* kepada Dewan Komisaris, Komite Audit, Direksi, Manajemen Senior, dan manajemen *auditee*;
5. Mengusulkan perbaikan dalam sistem manajemen risiko, pengendalian internal, tata kelola, kepatuhan, keuangan, operasional, dan teknologi informasi;
6. Memantau, menganalisis, dan melaporkan pelaksanaan tindakan perbaikan yang direkomendasikan oleh internal audit dan disepakati *auditee* sebagai hasil dari kegiatan *internal audit;*
7. Mengembangkan program *internal control self-assessment* untuk mengevaluasi efektivitas dan kualitas kegiatan *internal audit*;
8. Melaksanakan penugasan *assurance*, jika ada permintaan Direksi, Dewan Komisaris, Manajemen Senior, dan Manajemen;
9. *Internal audit* dapat melaksanakan kegiatan konsultasi kepada klien terkait, termasuk sifat dan ruang lingkupnya, serta durasinya akan disepakati dengan klien atas permintaan Direksi, Dewan Komisaris, Manajemen Senior, dan/atau Manajemen. *Internal audit* harus menjaga objektivitas dan independensi, ketika melaksanakan kegiatan konsultasi kepada klien terkait;
10. *Internal audit* dalam melaksanakan kegiatan konsultasi kepada klien dapat mengidentifikasi peluang untuk meningkatkan efisiensi proses tata kelola, manajemen risiko, dan pengendalian intern. *Internal audit* harus melaporkan kepada klien hasil dari kegiatan konsultasi tersebut, termasuk peluang perbaikan yang teridentifikasi;
11. *Internal Audit Group Head* maupun internal auditor dilarang mengemban tugas dan jabatan dalam aktivitas operasional PT. Bank Sinarmas Tbk., termasuk anak perusahaan PT. Bank Sinarmas Tbk.;
12. Menjalankan tugas *Internal Audit* Terintegrasi dan menyampaikan laporan kepada Direktur yang ditunjuk untuk melakukan fungsi pengawasan terhadap Lembaga Jasa Keuangan (LJK) dalam Konglomerasi Keuangan dan Dewan Komisaris Entitas Utama serta Direktur yang membawahkan fungsi kepatuhan Entitas Utama;
13. *Internal audit* melaporkan ringkasan hasil audit kepada pejabat yang membawahkan fungsi *internal audit* dari perusahaan induk.

## Duties and Responsibilities

The duties and responsibilities of SKAI Bank Sinarmas are stated as follows.

1. Propose and submit an annual internal audit work plan based on risk by considering the recommendations of the Audit Committee and approved by the President Director and the Board of Commissioners including documenting the results of risk assessments, human resources, and budgets;
2. Assess the risk management system, internal control, governance, compliance, finance, accounting, operations, and information technology implemented by management, and ensure that the system is adequate, comprehensive, and effective;
3. Assess compliance with relevant laws and regulations and contractual obligations;
4. Communicate the results of the assurance assignment to the Board of Commissioners, Audit Committee, Board of Directors, Senior Management, and auditee management;
5. Propose improvements in the risk management system, internal control, governance, compliance, finance, operations, and information technology;
6. Monitor, analyze, and report on the implementation of corrective actions recommended by the internal audit and agreed upon by the auditee as a result of internal audit activities;
7. Develop an internal control self-assessment program to evaluate the effectiveness and quality of internal audit activities;
8. Carry out assurance assignments, if requested by the Board of Directors, Board of Commissioners, Senior Management, and Management;
9. Internal audit can carry out consulting activities to related clients, including the nature and scope, and the duration will be agreed with the client at the request of the Board of Directors, Board of Commissioners, Senior Management, and/or Management. Internal audit must maintain objectivity and independence, when carrying out consulting activities to related clients;
10. Internal audit in carrying out consulting activities to clients can identify opportunities to improve the efficiency of governance processes, risk management, and internal control. Internal audit must report to the client the results of these consulting activities, including identified improvement opportunities;
11. Internal Audit Group Head and internal auditors are prohibited from carrying out duties and positions in the operational activities of PT. Bank Sinarmas Tbk., including subsidiaries of PT. Bank Sinarmas Tbk.;
12. Carry out the Integrated Internal Audit duties and submit reports to the Director appointed to carry out the supervisory function of the Financial Services Institution (LJK) in the Financial Conglomerate and the Board of Commissioners of the Main Entity and the Director in charge of the Main Entity's compliance function;
13. Internal audit reports a summary of audit results to the official in charge of the internal audit function of the parent company.

## Wewenang SKAI

Wewenang yang dimiliki SKAI dalam mendukung pelaksanaan tugas dan tanggung jawabnya, paling sedikit seperti diuraikan di bawah ini.

1. *Internal Audit Group Head* diberi kebebasan dalam menetapkan metode, cara, teknik, dan pendekatan audit yang dilakukan sesuai dengan profesi dan standar *internal audit*.
2. *Internal Audit Group Head* dan seluruh anggota *Internal Audit Group* diberi wewenang penuh untuk mengakses seluruh informasi yang relevan tentang bank terkait dengan tugas dan fungsi *internal audit*.
3. Melakukan komunikasi secara langsung dengan Direksi, Dewan Komisaris, dan Komite Audit.
4. Menyelenggarakan rapat secara berkala dan insidentil dengan Direksi, Dewan Komisaris, dan Komite Audit.
5. Melakukan koordinasi kegiatan dengan auditor ekstern untuk memastikan kecukupan ruang lingkup audit dan menghindari duplikasi pemeriksaan.
6. Mengikuti rapat yang bersifat strategis.

## Ruang Lingkup Pekerjaan SKAI

Ruang lingkup kegiatan SKAI meliputi, namun tidak terbatas pada penugasan yang objektif terhadap *evidence* dengan tujuan memberikan penilaian independen, kecukupan dan efektivitas tata kelola, manajemen risiko, serta sistem pengendalian intern bank maupun anak perusahaan kepada Dewan Komisaris, Direksi, Komite Audit, manajemen, dan pihak eksternal (jika diperlukan).

Penilaian *internal audit* mencakup evaluasi atas:

1. Risiko yang berkaitan dengan pencapaian tujuan strategis bank dapat diidentifikasi dan dimitigasi dengan tepat.
2. Kegiatan yang dilakukan oleh direksi, manajemen, karyawan, dan pihak ketiga telah mematuhi undang-undang, kebijakan, prosedur, serta standar tata kelola perusahaan yang berlaku.
3. Aktivitas dan program operasional konsisten dengan tujuan dan sasaran yang telah ditetapkan serta telah dijalankan secara efektif dan efisien.
4. Aktivitas dan sistem yang ditetapkan patuh terhadap undang-undang, kebijakan, prosedur, serta standar tata kelola perusahaan yang memiliki dampak signifikan terhadap operasional perusahaan.
5. Informasi dan metode yang digunakan untuk mengidentifikasi, mengukur, menganalisis, mengklasifikasikan, dan melaporkan informasi tersebut dapat diandalkan dan memiliki integritas.
6. Sumber daya dan aset perusahaan yang memiliki nilai ekonomis, digunakan secara efisien dan dikelola secara memadai.

## Kualifikasi dan Jumlah SKAI

Jumlah dan kualifikasi jabatan personel audit internal per 31 Desember 2024 diungkapkan pada tabel berikut.

## SKAI Authority

SKAI's authority in supporting the implementation of its duties and responsibilities, at least as described below.

1. Internal Audit Group Head is given the freedom to determine the methods, methods, techniques, and audit approaches carried out in accordance with the profession and internal audit standards.
2. Internal Audit Group Head and all members of the Internal Audit Group are given full authority to access all relevant information about the bank related to the duties and functions of internal audit.
3. Communicate directly with the Board of Directors, Board of Commissioners, and Audit Committee.
4. Hold regular and incidental meetings with the Board of Directors, Board of Commissioners, and Audit Committee.
5. Coordinate activities with external auditors to ensure the adequacy of the audit scope and avoid duplication of examinations.
6. Attend strategic meetings.

## Scope of SKAI Work

The scope of SKAI activities includes, but is not limited to, objective assignments to evidence with the aim of providing an independent assessment of the adequacy and effectiveness of governance, risk management, and internal control systems of the bank and its subsidiaries to the Board of Commissioners, Board of Directors, Audit Committee, management, and external parties (if necessary).

The internal audit assessment includes an evaluation of:

1. Risks related to achieving the bank's strategic objectives can be identified and mitigated appropriately.
2. Activities carried out by the board of directors, management, employees, and third parties have complied with applicable laws, policies, procedures, and corporate governance standards.
3. Operational activities and programs are consistent with the goals and objectives that have been set and have been implemented effectively and efficiently.
4. The activities and systems established comply with laws, policies, procedures, and corporate governance standards that have a significant impact on the company's operations.
5. The information and methods used to identify, measure, analyze, classify, and report such information are reliable and have integrity.
6. Company resources and assets that have economic value are used efficiently and managed adequately.

## Qualifications and Number of Internal Audit Personnel

The number and qualifications of internal audit personnel positions as of December 31, 2024 are disclosed in the following table.

| Uraian<br>Description | S2 | S1 | Jumlah<br>Total |
|---|---|---|---|
| Kepala SKAI<br>Head of SKAI | - | 1 | 1 |
| Kepala Divisi<br>Head of Division | 1 | 5 | 6 |
| Kepala Departemen<br>Head of Department | - | 15 | 15 |
| Kepala Seksi<br>Head of Section | 2 | 20 | 22 |
| Auditor | 3 | 47 | 50 |
| **Jumlah**<br>**Total** | **6** | **88** | **94** |

## Sertifikasi Auditor Internal

Auditor internal dipersyaratkan untuk memperoleh sertifikasi profesi Audit Internal, seperti Sertifikasi Kompetensi Bidang Audit Intern Bank serta disarankan untuk mengikuti program sertifikasi profesi lain, seperti Sertifikasi Kompetensi Bidang Manajeman Risiko Perbankan.

## Internal Auditor Certification

Internal auditors are required to obtain Internal Audit professional certification, such as the Bank Internal Audit Competency Certification and are advised to participate in other professional certification programs, such as the Banking Risk Management Competency Certification.

| Uraian<br>Description | Jumlah<br>Total |
|---|---|
| Sertifikasi Auditor Kualifikasi IV KKNI<br>Auditor Certification Qualification IV KKNI | 53 |
| Sertifikasi Audit Supervisor Kualifikasi V KKNI<br>Audit Supervisor Certification Qualification V KKNI | 23 |
| Sertifikasi Audit Manager Kualifikasi VI KKNI<br>Audit Manager Certification Qualification VI KKNI | 7 |
| Sertifikasi Manajemen Risiko Kualifikasi 4<br>Risk Management Certification Qualification 4 | 65 |
| Sertifikasi Manajemen Risiko Kualifikasi 5<br>Risk Management Certification Qualification 5 | 24 |
| Sertifikasi Manajemen Risiko Kualifikasi 6<br>Risk Management Certification Qualification 6 | 1 |
| *Qualified Internal Audit (QIA)* | 1 |
| *Certified of Information System Auditor (CISA)* | 1 |
| *Control Objective for Information and Related Technology (COBIT)* | 4 |
| *Cisco Certified Network Associate (CCNA)* | 1 |
| *Train the Trainer* | 1 |
| *Certified Anti-Fraud Manager (CAFM)* | 1 |
| *Certified Information Technology Infrastructure Library (ITIL)* | 1 |
| *Certified in Internal Audit on ISMS Based on ISO27001* | 1 |
| ISMS-ISO/IEC 27001:2022 | 3 |
| *Certified Ethical Hacker (CEH)* | 2 |
| *Certified Computer Hacking Forensic Investigator (CHFI)* | 1 |

## Pengembangan Kompetensi SKAI

Bank Sinarmas memfasilitasi personel SKAI, baik kepala maupun SDM di lingkungan SKAI, untuk mengikuti berbagai program pengembangan kompetensi. Langkah ini dilakukan untuk memastikan personel SKAI memiliki kompetensi yang diperlukan untuk menjalankan perannya secara efektif dalam mendukung kesuksesan dan keberlanjutan Bank. Informasi mengenai program pengembangan kompetensi personel SKAI pada tahun 2024 diungkapkan sebagai berikut.

## SKAI Competency Development

Bank Sinarmas facilitates SKAI personnel, both heads and HR within SKAI, to participate in various competency development programs. This step is taken to ensure that SKAI personnel have the competencies needed to carry out their roles effectively in supporting the success and sustainability of the Bank. Information regarding the SKAI personnel competency development program in 2024 is disclosed as follows.

| Materi Pengembangan Kompetensi<br>Competency Development Material | Tempat/Tanggal<br>Venue/Date | Penyelenggara<br>Organizer |
|---|---|---|
| Technical Skill-Risk Management: Pemahaman Sustainability dan Peraturan OJK tentang Keuangan Berkelanjutan<br>Technical Skill-Risk Management: Understanding Sustainability and OJK Regulations on Sustainable Finance | Jakarta, 10 Januari 2024<br>Jakarta, January 10, 2024 | Bank Sinarmas |
| Google Workspace (GWS) Collaborators Tools | Jakarta, 16 Januari 2024<br>Jakarta, January 16, 2024 | Bank Sinarmas |
| Workshop Internal Audit Group: Kick Off Annual Audit Plan 2024 and Training Managing People & Leadership | Jakarta, 30-31 Januari 2024<br>Jakarta, January 31-30, 2024 | Bank Sinarmas |
| Office Application GWS Collaborations Tolls | Jakarta, 23 Januari 2024<br>Jakarta, January 23, 2024 | Bank Sinarmas |
| Town Hall Q1-DREAM T.E.A.M. (Together, Excellence, Action, Mission) | Jakarta, 26 Januari 2024<br>Jakarta, January 26, 2024 | Bank Sinarmas |
| Public Speaking for Audit | Jakarta, 3 Februari 2024<br>Jakarta, February 3, 2024 | The Indonesia Internal Audit Community |
| ISO 27001:2019 Implementation | Jakarta, 12-13 Februari 2024<br>Jakarta, February 12-13, 2024 | Bank Sinarmas |
| Agile Scrum | Jakarta, 26-27 Februari 2024<br>Jakarta, February 26-27, 2024 | PT Smartindo Manajemen Indonesia |
| PCI DSS Foundation | Jakarta, 26-27 Februari 2024<br>Jakarta, February 26-27, 2024 | PT Smartindo Manajemen Indonesia |
| Penilaian Tingkat Maturitas Digital Bank Umum sejalan dengan POJK no.11/POJK.03/2022 tentang Penyelenggaraan Teknologi Informasi oleh Bank Umum<br>Assessment of Digital Maturity Level of Commercial Banks in line with POJK no.11/POJK.03/2022 concerning the Implementation of Information Technology by Commercial Banks | Jakarta, 28-29 Februari 2024<br>Jakarta, February 28-29, 2024 | Nayottama |
| GWS Champion User | Jakarta, 29 Februari 2024<br>Jakarta, February 29, 2024 | Bank Sinarmas |
| Security Services | Jakarta, 7-8 Maret 2024<br>Jakarta, March 7-8, 2024 | Bank Sinarmas |
| GWS Train The Trainer | Jakarta, 29 April 2024<br>Jakarta, April 29, 2024 | Bank Sinarmas |
| Basel III Reform for Credit & Market Risk | Jakarta, 24-25 April 2024<br>Jakarta, April 24-25, 2024 | IAIB |
| ESG Mastery Complete Corporate Sustainability | Jakarta, 1 April-30 Juni 2024<br>Jakarta, April 1-June 30, 2024 | UDEMY |
| Understanding & managing Carbon Accounting: A Masterclass | Jakarta, 1 April-30 Juni 2024<br>Jakarta, April 1-June 30, 2024 | UDEMY |
| Pelatihan Lengkap: Perdagangan Saham dengan Analisa Teknis<br>Complete Training: Stock Trading with Technical Analysis | Jakarta, 1 April-30 Juni 2024<br>Jakarta, April 1-June 30, 2024 | UDEMY |
| Lengkap! Belajar Langkah Demi Langkah Kuasai Pelaporan PPN<br>Complete! Learn Step by Step to Master VAT Reporting | Jakarta, 1 April-30 Juni 2024<br>Jakarta, April 1-June 30, 2024 | UDEMY |
| Time Management Mastery: Tingkarkan Sukses & Produktivitas<br>Time Management Mastery: Increase Success & Productivity | Jakarta, 1 April-30 Juni 2024<br>Jakarta, April 1-June 30, 2024 | UDEMY |
| Manajemen Tim dan Karyawan<br>Team and Employee Management | Jakarta, 1 April-30 Juni 2024<br>Jakarta, April 1-June 30, 2024 | UDEMY |
| Effective Communication in the Workplace | Jakarta, 1 April-30 Juni 2024<br>Jakarta, April 1-June 30, 2024 | UDEMY |
| Master Microsoft Excel Macros and Excel VBA | Jakarta, 1 April-30 Juni 2024<br>Jakarta, April 1-June 30, 2024 | UDEMY |
| Communication Fundamentals: How to Communicate Better | Jakarta, 1 April-30 Juni 2024<br>Jakarta, April 1-June 30, 2024 | UDEMY |
| Fundamentals of ESG and Sustainable Finance for 2024 | Jakarta, 1 April-30 Juni 2024<br>Jakarta, April 1-June 30, 2024 | UDEMY |
| Belajar Bahasa Inggris Lengkap dan Mudah untuk Pemula<br>Learn Complete and Easy English for Beginners | Jakarta, 1 April-30 Juni 2024<br>Jakarta, April 1-June 30, 2024 | UDEMY |
| Governance, Risk and Control | Jakarta, 7 Mei 2024<br>Jakarta, May 7, 2024 | Bank Sinarmas |
| Interest Rate Risk in The Banking Book (IRRBB) | Jakarta, 5-6 Juni 2024<br>Jakarta, June 5-6, 2024 | Bank Sinarmas |
| Forum Penguatan Fungsi GRC: Diseminasi Standar Audit Internal Terkini<br>GRC Function Strengthening Forum: Dissemination of the Latest Internal Audit Standards | Jakarta, 7 Juni 2024<br>Jakarta, June 7, 2024 | Otoritas Jasa Keuangan |
| Workshop Navigating the Global Internal Audit Standards | Semarang, 13-14 Juni 2024<br>Semarang, June 13-14, 2024 | IIA Indonesia |
| Peran Innovative Credit Scoring (ICS) dalam Meningkatkan Akses Pendanaan<br>The Role of Innovative Credit Scoring (ICS) in Increasing Access to Funding | Jakarta, 27 Juni 2024<br>Jakarta, June 27, 2024 | OJK Institute |

| Materi Pengembangan Kompetensi<br>Competency Development Material | Tempat/Tanggal<br>Venue/Date | Penyelenggara<br>Organizer |
|---|---|---|
| Becoming A Probability & Statistics Master | Jakarta,<br>1 Juli-30 September 2024<br>Jakarta,<br>July 1-September 30, 2024 | UDEMY |
| Pengantar Statistika dan Probabilitas untuk Pemula<br>Introduction to Statistics and Probability for Beginners | Jakarta,<br>1 Juli-30 September 2024<br>Jakarta,<br>July 1-September 30, 2024 | UDEMY |
| Internal Auditor Readiness in Facing Cyber Attacks | Jakarta, 6 Juli 2024<br>Jakarta, July 6, 2024 | Yayasan Pendidikan Internal Audit (YPIA) |
| Enterprise Architecture Jumpstart | Jakarta, 5-8 Agustus 2024<br>Jakarta, August 5-8, 2024 | Bank Sinarmas |
| Planning and Organizing for Division Head | Jakarta, 9-10 Agustus 2024<br>Jakarta, August 9-10, 2024 | Bank Sinarmas |
| Insurance Fraud | Jakarta, 22 Agustus 2024<br>Jakarta, August 22, 2024 | Asia Anti Fraus Management |
| ACIIA Regional Conference: Purposeful Impact | Bali, 28-29 Agustus 2024<br>Bali, August 28-29, 2024 | IIA Indonesia |
| How to Prevent Money Laundering and Terrorism Financing | Jakarta, 5 September 2024<br>Jakarta, September 5, 2024 | OJK Institute dan The London Institute of Banking |
| Implementasi Cyber Security Audit | Jakarta, 7-8 November 2024<br>Jakarta, November 7-8, 2024 | Bank Sinarmas |
| The Future Data Analytics in The Financial Industry: Trends and Innovations | Jakarta, 12 September 2024<br>Jakarta, September 12, 2024 | OJK Institute dan Orbit Future Academy |
| Indonesia Security Summit 2024: Encrypting Indonesia for a Secure Tommorow | Jakarta, 24-25 September 2024<br>Jakarta, September 24-25, 2024 | Kementerian Komunikasi dan Informatika |
| Treasury & Fund Transfer Pricing | Jakarta, 24-26 September 2024<br>Jakarta, September 24-26, 2024 | IAIB dan Bank Sinarmas |



## Pelaksanaan Tugas dan Tanggung Jawab Tahun 2024

Sepanjang tahun 2024, SKAI telah merealisasikan tugas dan tanggung jawab berikut.

## Implementation of Duties and Responsibilities in 2024

Throughout 2024, SKAI has realized the following duties and responsibilities.

### Realisasi Tugas SKAI
**Realization of SKAI Duties**

| Area Jenis Pemeriksaan<br>Type of Examination | Kantor Cabang[1]<br>Branch Office | Unit Kerja<br>Work Unit |
|---|---|---|
| Pemeriksaan Tahunan<br>Annual Examination | 88 | 44 |
| Regulatory Requirement | - | 4 |
| Thematic Review | - | 10 |
| Ad-Hoc IT | - | 7 |
| **Jumlah**<br>**Total** | **88** | **65** |

Keterangan:
[1] Termasuk KC, KCP, KK, dan KFO.
Note:
[1] Including KC, KCP, KK, and KFO.

### Rapat SKAI
**SKAI Meeting**

| Uraian<br>Description | Rapat dengan:<br>Meeting with: | | |
|---|---|---|---|
| | Direksi<br>Board of Directors | Dewan Komisaris<br>Board of Commissioners | Komite Audit<br>Audit Committee |
| Jumlah Rapat<br>Number of Meeting | 4 | 4 | 11 |

# SISTEM PENGENDALIAN INTERNAL
## Internal Control System

Sistem Pengendalian Internal (SPI) yang efektif merupakan komponen penting dalam manajemen Bank Sinarmas dan menjadi dasar kegiatan operasional Bank yang sehat dan aman. SPI yang efektif dapat membantu pengurus Bank menjaga aset, menjamin tersedianya pelaporan keuangan dan manajerial yang dapat dipercaya, meningkatkan kepatuhan terhadap ketentuan dan peraturan perundang-undangan yang berlaku, serta mengurangi risiko terjadinya kerugian, penyimpangan dan pelanggaran terhadap aspek kehati-hatian.

### Tujuan Pengendalian Internal

Tujuan penerapan pengendalian internal di lingkungan Bank Sinarmas diuraikan sebagai berikut.

1. Menjamin semua kegiatan usaha Bank telah dilaksanakan sesuai ketentuan dan peraturan perundang-undangan yang berlaku, baik ketentuan yang dikeluarkan pemerintah, Otoritas Jasa Keuangan maupun kebijakan, ketentuan dan peraturan internal yang ditetapkan oleh Bank.
2. Menjamin tersedianya laporan yang lengkap, akurat, tepat guna dan tepat waktu yang diperlukan dalam rangka pengambilan keputusan yang tepat dan dapat dipertanggungjawabkan.
3. Meningkatkan efektivitas dan efisiensi dalam menggunakan aset dan sumber daya lainnya dalam rangka melindungi Bank dari risiko kerugian.
4. Mengidentifikasi kelemahan dan menilai penyimpangan secara dini serta menilai kembali kewajaran kebijakan dan prosedur yang ada di bank secara berkesinambungan.

### Kesesuaian Pengendalian Internal dengan COSO

Bank Sinarmas mengimplementasikan Sistem Pengendalian Intern sesuai pedoman yang telah ditetapkan oleh Komisaris dan Direksi melalui Surat Keputusan SK. No.099/2022/PRESDIR-SKAI tanggal 8 Agustus 2022 mengenai Kebijakan Sistem Pengendalian Intern Versi 5.0. Dalam pelaksanaannya, Bank memiliki pedoman yang mencakup 5 elemen utama yang saling terkait, yakni:

1. *A control environment* (lingkungan pengendalian);
2. *Risk assessment* (penaksiran risiko);
3. *Control activities* (kegiatan pengendalian);
4. *Information and communication* (informasi dan komunikasi); dan
5. *Monitoring* (pemantauan).

Kelima komponen ini sejalan dengan Internal *Control Integrated Framework* yang dikembangkan oleh *The Committee of Sponsoring Organization of the Treadway Commission* (COSO).

An effective Internal Control System (SPI) is an important component in Bank Sinarmas management and is the basis for the Bank's healthy and safe operational activities. An effective SPI can help Bank management maintain assets, ensure the availability of reliable financial and managerial reporting, improve compliance with applicable laws and regulations, and reduce the risk of losses, deviations and violations of prudential aspects.

### Internal Control Objectives

The objectives of implementing internal control in Bank Sinarmas are described as follows.

1. Ensure that all Bank business activities have been carried out in accordance with applicable laws and regulations, both provisions issued by the government, the Financial Services Authority and policies, provisions and internal regulations set by the Bank.
2. Ensure the availability of complete, accurate, appropriate and timely reports needed in order to make appropriate and accountable decisions.
3. Increase the effectiveness and efficiency in using assets and other resources in order to protect the Bank from the risk of loss.
4. Identify weaknesses and assess deviations early on and reassess the fairness of existing policies and procedures in the bank on an ongoing basis.

### Compliance of Internal Control with COSO

Bank Sinarmas implements an Internal Control System in accordance with the guidelines set by the Commissioners and Directors through Decree SK. No.099/2022/PRESDIR-SKAI dated August 8, 2022 concerning the Internal Control System Policy Version 5.0. In its implementation, the Bank has guidelines that cover 5 main interrelated elements, namely:

1. A control environment;
2. Risk assessment;
3. Control activities;
4. Information and communication; and
5. Monitoring.

These five components are in line with the Internal Control Integrated Framework developed by The Committee of Sponsoring Organizations of the Treadway Commission (COSO).

## Pelaksanaan Sistem Pengendalian Internal

Bank Sinarmas mengimplementasikan SPI secara menyeluruh dan memadai sesuai dengan tujuan, ukuran, kompleksitas usaha, dan risiko yang dihadapi. Hal tersebut dilakukan dengan mengacu pada:

1. Kebijakan dan prosedur yang telah ditetapkan oleh Direksi dan/atau Dewan Komisaris;
2. Struktur organisasi yang menggambarkan secara jelas tugas & tanggung jawab masing-masing unit dan individu; serta
3. Tersedianya pelaporan keuangan dan manajerial yang dapat dipercaya dengan sistem yang mendukung serta dilaporkan secara berkala kepada Dewan Komisaris dan Direksi.

Mekanisme pengawasan dilakukan di seluruh tingkatan, mulai dari manajemen tertinggi hingga tingkat terendah, dengan mengacu pada prinsip four eyes principles. Dengan pembagian fungsi, tugas, dan wewenang yang jelas, diharapkan sistem pengendalian intern dapat berjalan efektif.

Sementara itu, tanggung jawab bersama atas pelaksanaan SPI atas fungsi manajemen risiko terletak pada lini pertama, lini kedua, dan lini ketiga. Manajemen dan karyawan memiliki peran, tanggung jawab, serta kewajiban untuk menerapkan, mematuhi, dan meningkatkan SPI di Bank Sinarmas.

## Pengendalian Bidang Keuangan

Bank telah memiliki sistem akuntansi yang memadai. Sistem akuntansi yang dimiliki telah menghasilkan informasi keuangan yang akurat, tepat, dan konsisten karena Bank memiliki kebijakan akuntansi sesuai prinsip/ketentuan yang berlaku dan didukung sistem pencatatan yang efektif dan proses rekonsiliasi yang didokumentasikan dengan baik.

## Pengendalian Bidang Operasional

Untuk dapat mendukung pengendalian risiko operasional secara menyeluruh Bank telah menerapkan Pemisahan fungsi agar tidak menimbulkan conflict of interest, Supervisor yang berfungsi mengawasi jalannya kontrol internal dan Pengawasan Internal yang berfungsi meyakini pelaksanaan kontrol internal di unit kerja operasional.

Selain itu, Setiap transaksi operasional perbankan yang dilakukan telah mempunyai prosedur kerja yang dituangkan dalam manual kerja, untuk memastikan bahwa risiko operasional yang mungkin ada pada aktivitas tersebut telah dimitigasi dengan baik.

## Pengendalian Kepatuhan terhadap Peraturan Perundang-undangan

Untuk memastikan kepatuhan Bank terhadap peraturan perundang-undangan yang berlaku, Bank Sinarmas telah memiliki komitmen mematuhi peraturan perundang-undangan yang berlaku dan mengambil langkah-langkah untuk memperbaiki kelemahan risiko ini, apabila terjadi. Selain itu, Bank melakukan pemantauan kepatuhan pelaporan kepada BI/OJK/regulator lainnya.

## Implementation of Internal Control System

Bank Sinarmas implements SPI comprehensively and adequately in accordance with the objectives, size, complexity of the business, and risks faced. This is done by referring to:

1. Policies and procedures that have been established by the Board of Directors and/or Board of Commissioners;
2. Organizational structure that clearly describes the duties & responsibilities of each unit and individual; and
3. Availability of reliable financial and managerial reporting with a supporting system and reported periodically to the Board of Commissioners and Board of Directors.

The supervision mechanism is carried out at all levels, from the highest management to the lowest level, by referring to the four eyes principles. With a clear division of functions, duties, and authorities, it is expected that the internal control system can run effectively.

Meanwhile, the joint responsibility for the implementation of SPI for the risk management function lies with the first line, second line, and third line. Management and employees have roles, responsibilities, and obligations to implement, comply with, and improve SPI at Bank Sinarmas.

## Financial Control

The Bank has an adequate accounting system. The accounting system has produced accurate, precise, and consistent financial information because the Bank has accounting policies in accordance with applicable principles/regulations and is supported by an effective recording system and a well documented reconciliation process.

## Operational Control

To be able to support overall operational risk control, the Bank has implemented separation of functions so as not to cause conflicts of interest, Supervisors who function to oversee the running of internal controls and Internal Supervision whose function is to ensure the implementation of internal controls in the operational work unit.

In addition, every banking operational transaction carried out has a work procedure outlined in the work manual, to ensure that operational risks that may exist in these activities have been properly mitigated.

## Compliance Control to Legislation

To ensure the Bank's compliance with the prevailing laws and regulations, Bank Sinarmas has a commitment to comply with the prevailing laws and regulations and take steps to correct this risk weakness, if any. In addition, the Bank monitors the compliance of reporting to BI/OJK/other regulators.

## Tinjauan atas Efektivitas Sistem Pengendalian Internal

Bank Sinarmas melaksanakan sistem pengendalian intern sesuai dengan *Internal Control Integrated Framework* yang telah dikeluarkan oleh COSO. Kegiatan pengendalian terlebih dahulu direncanakan dan diterapkan guna mengendalikan risiko yang dapat mempengaruhi kinerja atau mengakibatkan kerugian Bank.

Permasalahan yang berkaitan dengan kecukupan pengendalian intern telah dilaporkan kepada Direksi, Dewan Komisaris dan Komite Audit dan langkah-langkah tindak lanjut telah dilakukan untuk meminimalkan risiko.

## Pernyataan Direksi dan/atau Dewan Komisaris atas Kecukupan Sistem Pengendalian Internal

Direksi dan Dewan Komisaris telah mengevaluasi secara berkala implementasi SPI di Bank. Berdasarkan evaluasi tersebut, keduanya menyatakan bahwa Bank telah berhasil menerapkan SPI yang efektif dan memadai dalam mengelola risiko-risiko yang dihadapi.

Bank tetap berada dalam batas toleransi risiko (*risk appetite*), yang mencerminkan operasional yang berjalan secara efektif dan efisien, penyampaian laporan keuangan yang akurat dan dapat diandalkan, serta pengamanan aset Bank dan kepatuhan terhadap hukum dan peraturan yang berlaku. Oleh karena itu, Bank Sinarmas berpandangan bahwa pelaksanaan sistem pengendalian internal pada tahun 2024 telah berjalan dengan baik. Meskipun demikian, hasil evaluasi tersebut senantiasa dikaji guna meningkatkan efektivitas pelaksanaan sistem pengendalian intern ke depannya.

## Review of the Effectiveness of the Internal Control System

Bank Sinarmas implements an internal control system in accordance with the Internal Control Integrated Framework issued by COSO. Control activities are planned and implemented in advance to control risks that may affect performance or result in losses for the Bank.

Issues related to the adequacy of internal control have been reported to the Board of Directors, Board of Commissioners and Audit Committee and follow-up steps have been taken to minimize the risk.

## Statement by the Board of Directors and/or Board of Commissioners on the Adequacy of the Internal Control System

The Board of Directors and Board of Commissioners have periodically evaluated the implementation of SPI in the Bank. Based on this evaluation, both stated that the Bank has successfully implemented an effective and adequate SPI in managing the risks faced.

The Bank remains within the risk appetite, which reflects effective and efficient operations, accurate and reliable financial reporting, and the security of the Bank's assets and compliance with applicable laws and regulations. Therefore, Bank Sinarmas is of the view that the implementation of the internal control system in 2024 has been running well. However, the results of the evaluation are continuously reviewed in order to improve the effectiveness of the implementation of the internal control system in the future.



# SATUAN KERJA KEPATUHAN
## Compliance Work Unit

Bank Sinarmas memandang bahwa tantangan dan risiko usaha Bank semakin besar, sehingga diperlukan berbagai upaya yang dapat dilakukan untuk memitigasi risiko. Upaya tersebut dapat bersifat preventif (*ex-ante*) dan kuratif (*ex-post*). Upaya yang bersifat preventif sangat diperlukan untuk mengurangi atau memperkecil potensi risiko kegiatan usaha Bank yang diperkirakan akan terjadi.

Bank Sinarmas views that the challenges and risks of the Bank's business are increasing, so that various efforts are needed to mitigate the risks. These efforts can be preventive (ex-ante) and curative (ex-post). Preventive efforts are very much needed to reduce or minimize the potential risks of the Bank's business activities that are expected to occur.

Oleh karena itu, diperlukan adanya peningkatan peran dan Fungsi Kepatuhan serta Satuan Kerja Kepatuhan dalam pengelolaan Risiko Kepatuhan. Upaya yang bersifat kuratif, Direktur yang membawahkan fungsi kepatuhan berperan dalam melakukan mitigasi risiko, dengan dibantu oleh Satuan Kerja Kepatuhan (SKK) yang juga bertugas melaksanakan Fungsi Kepatuhan dan mengoordinasikan upaya peningkatan Budaya Kepatuhan. Melalui upaya tersebut, Bank Sinarmas menegaskan komitmen kuat untuk mematuhi peraturan dan ketentuan regulator, serta memastikan manajemen risiko kepatuhan yang efektif dan efisien dalam merespons perubahan kondisi risiko.

## Direktur Kepatuhan

Posisi Direktur Kepatuhan dijabat oleh Ibu Amandalia Johanes, yang ditetapkan berdasarkan Persetujuan Otoritas Jasa Keuangan melalui Surat Keputusan Anggota Dewan Komisioner Otoritas Jasa Keuangan Nomor KEP-109/D.03/2024 tanggal 30 Agustus 2024 dan Rapat Umum Pemegang Saham Luar Biasa tanggal 28 Oktober 2024. Uraian terkait tugas dan tanggung jawab Direktur Kepatuhan, sebagai berikut.

1. Merumuskan strategi guna mendorong terciptanya Budaya Kepatuhan Bank.
2. Mengusulkan kebijakan kepatuhan atau prinsip-prinsip kepatuhan termasuk penerapan program APU, PPT, dan PPPSPM yang akan ditetapkan oleh Direksi kepada Dewan Komisaris.
3. Menetapkan sistem dan prosedur kepatuhan yang digunakan untuk menyusun ketentuan dan pedoman internal Bank.
4. Melakukan *review* kebijakan, ketentuan, sistem, dan prosedur, serta kegiatan usaha yang dilakukan Bank agar sesuai dengan ketentuan Otoritas Jasa Keuangan, ketentuan Bank Indonesia, dan ketentuan peraturan perundang-undangan.
5. Meminimalkan Risiko Kepatuhan Bank.
6. Melakukan tindakan pencegahan agar kebijakan dan/atau keputusan yang diambil Direksi Bank atau pimpinan kantor cabang dari Bank yang berkedudukan di luar negeri tidak menyimpang dari ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan.
7. Melakukan tugas lain yang terkait dengan Fungsi Kepatuhan, antara lain memantau dan menjaga kepatuhan Bank terhadap komitmen yang dibuat oleh Bank kepada Otoritas Jasa Keuangan maupun otoritas pengawas lain yang berwenang.
8. Melakukan pengawasan aktif terkait dengan penerapan program APU, PPT, dan PPPSPM.
9. Melaporkan pelaksanaan tugas dan tanggungjawabnya sebagaimana tercantum pada poin 1-8 di atas kepada Direktur Utama dengan tembusan kepada Dewan Komisaris paling sedikit secara triwulan.

Therefore, it is necessary to increase the role and Compliance Function and Compliance Work Unit in managing Compliance Risk. Curative efforts, the Director who oversees the compliance function plays a role in mitigating risks, assisted by the Compliance Work Unit (SKK), which is also tasked with implementing the Compliance Function and coordinating efforts to improve Compliance Culture. Through these efforts, Bank Sinarmas confirms its strong commitment to comply with regulatory regulations and provisions, as well as ensuring effective and efficient compliance risk management in responding to changes in risk conditions.

## Compliance Director

The position of Compliance Director is held by Mrs. Amandalia Johanes, who was appointed based on the Approval of the Financial Services Authority through the Decree of the Members of the Board of Commissioners of the Financial Services Authority Number KEP-109/D.03/2024 dated August 30, 2024 and the Extraordinary General Meeting of Shareholders dated October 28, 2024. Description of the duties and responsibilities of the Compliance Director, as follows:.

1. Formulate strategies to encourage the creation of the Bank's Compliance Culture.
2. Propose compliance policies or compliance principles including the implementation of APU, PPT, and PPPSPM programs that will be determined by the Board of Directors to the Board of Commissioners.
3. Determine the compliance systems and procedures used to prepare the Bank's internal provisions and guidelines.
4. Review policies, provisions, systems, and procedures, as well as business activities carried out by the Bank to comply with the provisions of the Financial Services Authority, Bank Indonesia provisions, and provisions of laws and regulations.
5. Minimize Bank Compliance Risk.
6. Taking preventive measures so that policies and/or decisions taken by the Bank's Board of Directors or branch office managers of Banks domiciled abroad do not deviate from the provisions of the Financial Services Authority and the provisions of laws and regulations.
7. Carrying out other tasks related to the Compliance Function, including monitoring and maintaining the Bank's compliance with commitments made by the Bank to the Financial Services Authority and other authorized supervisory authorities.
8. Carrying out active supervision related to the implementation of the APU, PPT, and PPPSPM programs.
9. Reporting the implementation of duties and responsibilities as stated in points 1-8 above to the President Director with a copy to the Board of Commissioners at least quarterly.

## Tanggung Jawab Satuan Kerja Kepatuhan

Tanggung jawab SKK Bank Sinarmas diuraikan sebagai berikut.

1. Membuat program dan langkah-langkah untuk mendukung terciptanya Budaya Kepatuhan pada seluruh kegiatan usaha Bank pada setiap jenjang organisasi.
2. Melakukan identifikasi, pengukuran, pemantauan, dan pengendalian terhadap Risiko Kepatuhan dengan mengacu pada ketentuan Otoritas Jasa Keuangan, Bank Indonesia, Pusat Pelaporan dan Analisis Transaksi Keuangan, serta ketentuan peraturan perundang-undangan lainnya yang mengatur mengenai penerapan manajemen risiko bagi bank umum;
3. Menilai dan mengevaluasi efektivitas, kecukupan, dan kesesuaian kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank dengan ketentuan peraturan perundang-undangan.
4. Melakukan kaji ulang dan/atau merekomendasikan pengkinian dan penyempurnaan kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank agar sesuai dengan ketentuan Otoritas Jasa Keuangan, ketentuan Bank Indonesia dan ketentuan peraturan perundang-undangan lainnya.
5. Melakukan *review* kebijakan, ketentuan, sistem dan prosedur, serta kegiatan usaha Bank agar sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan lainnya.
6. Melakukan tugas-tugas yang terkait dengan Fungsi Kepatuhan, antara lain:
   a. Memastikan kepatuhan Bank terhadap komitmen yang dibuat oleh Bank kepada Bank Indonesia, Otoritas Jasa Keuangan dan/atau otoritas pengawas lain yang berwenang.
   b. Melakukan pemantauan atas peraturan perundangan-undangan yang berdampak pada Bank, menyusun kajian dampak dari peraturan perundangan-undangan serta menyampaikan hasil kajian tersebut kepada unit kerja terkait untuk setiap peraturan eksternal yang berpengaruh terhadap kegiatan operasional Bank;
   c. Memantau dan menganalisis penerapan ketentuan eksternal di unit kerja, baik melalui uji kepatuhan (*compliance testing*) pada unit kerja yang bersangkutan maupun berdasarkan laporan hasil audit SKAI;
   d. Memberikan opini/*advice* kepatuhan kepada unit-unit kerja pada pengembangan aktivitas, produk, Pengajuan fasilitas kredit baru atau pengajuan penambahan *plafond*/ limit fasilitas kredit untuk pihak terkait maupun pihak tidak terkait yang diajukan secara single debitur maupun *one obligor,* Pengajuan fasilitas baru perpanjangan atau perubahan fasilitas yang diajukan oleh Treasury & Financial Institution Group baik secara *single counterparty* maupun *one obligor* termasuk fasilitas untuk pihak terkait, penyusunan kebijakan dan prosedur internal Bank yang memiliki risiko kepatuhan;
   e. Melakukan *review* kepatuhan terhadap aktivitas pengajuan pembukaan, penutupan, relokasi, *upgrade* status cabang, dan jaringan kerja;

## Responsibilities of the Compliance Work Unit

The responsibilities of SKK Bank Sinarmas are described as follows.

1. Create programs and steps to support the creation of a Compliance Culture in all Bank business activities at every level of the organization.
2. Identify, measure, monitor, and control Compliance Risks by referring to the provisions of the Financial Services Authority, Bank Indonesia, the Financial Transaction Reports and Analysis Center, and other laws and regulations governing the implementation of risk management for commercial banks;
3. Assess and evaluate the effectiveness, adequacy, and suitability of policies, provisions, systems and procedures owned by the Bank with the provisions of laws and regulations.
4. Review and/or recommend updating and improving policies, provisions, systems and procedures owned by the Bank to comply with the provisions of the Financial Services Authority, the provisions of Bank Indonesia and other laws and regulations.
5. Review policies, provisions, systems and procedures, as well as the Bank's business activities to comply with the provisions of the Financial Services Authority and other laws and regulations.
6. Performing tasks related to the Compliance Function, including:
   a. Ensuring the Bank's compliance with the commitments made by the Bank to Bank Indonesia, the Financial Services Authority and/or other authorized supervisory authorities.
   b. Monitoring laws and regulations that impact the Bank, compiling impact studies of laws and regulations and submitting the results of these studies to the relevant work units for each external regulation that affects the Bank's operational activities;
   c. Monitoring and analyzing the implementation of external provisions in the work unit, either through compliance testing at the relevant work unit or based on the SKAI audit report;
   d. Providing compliance opinions/advice to work units on the development of activities, products, Submission of new credit facilities or submission of additional credit facility ceilings/limits for related parties or unrelated parties submitted as a single debtor or one obligor, Submission of new facilities, extensions or changes to facilities submitted by the Treasury & Financial Institution Group either as a single counterparty or one obligor including facilities for related parties, preparation of internal Bank policies and procedures that have compliance risks;
   e. Conducting compliance reviews on activities for opening, closing, relocation, upgrading branch status, and work networks;

f. Berkoordinasi dengan unit kerja terkait dalam penyusunan dan pengkinian pedoman internal yang terkait dengan penerapan manajemen risiko kepatuhan;
g. Mengidentifikasi dan mengkinikan parameter serta profil risiko kepatuhan dalam setiap aktivitas fungsional dan memastikan bahwa risiko tersebut telah dikendalikan dengan baik oleh unit kerja terkait;
h. Menyiapkan Laporan Direktur Kepatuhan yang wajib disampaikan kepada regulator maupun untuk kebutuhan pengawasan Direksi dan Komisaris Bank;
i. Melakukan koordinasi untuk pengajuan dan pemantauan atas pengajuan perizinan produk, aktivitas, dan pengembangan sistem Bank di Otoritas Jasa Keuangan dan/atau Bank Indonesia;
j. Memantau dan menganalisa sanksi denda dari regulator, mengidentifikasi akar penyebab denda dan mendorong dilakukan upaya korektif dan/atau preventif guna mencegah terulangnya sanksi dan/atau meminimalisasi sanksi denda;
k. Memantau pelaksanaan dan tindak lanjut pemenuhan ketentuan peraturan perundang-undangan yang berdampak bagi bank;
l. Melakukan supervisi, mengkoordinasi, mendorong serta memantau penerapan *Good Corporate Governance* (GCG), penerapan kepatuhan dan keuangan berkelanjutan pada Bank;
m. Melakukan supervisi, koordinasi, serta memantau penerapan GCG, penerapan kepatuhan pada Konglomerasi Keuangan Grup Sinar Mas;
n. Sebagai *Liaison Officer* Bank ke regulator atas pelaksanaan pengawasan maupun pemeriksaan oleh regulator; dan
o. Meningkatkan kesadaran atas budaya kepatuhan melalui program kampanye kepatuhan melalui media komunikasi internal dalam bentuk *Compliance Info* (Co.In) dengan bentuk infografis yang bertujuan untuk memberikan *refreshment* peraturan perundang-undangan yang menarik dan mudah dipahami.

7. Melakukan tugas dalam rangka memastikan penerapan peraturan perundang-undangan Anti Pencucian Uang, Pencegahan Pendanaan Terorisme dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal (APU, PPT, & PPPSPM) pada Bank, meliputi:
   a. Menganalisis secara berkala penilaian risiko Tindak Pidana Pencucian Uang (TPPU), Tindak Pidana Pendanaan Terorisme (TPPT, dan/atau Pendanaan Proliferasi Senjata Pemusnah Massal (PPSPM) terkait dengan nasabah, negara atau area geografis, produk, jasa, transaksi atau jaringan distribusi;
   b. Menyusun, melakukan pengkinian, dan mengusulkan kebijakan dan prosedur penerapan program APU, PPT, & PPPSPM yang telah disusun untuk mengelola dan memitigasi risiko berdasarkan penilaian risiko, untuk dimintakan pertimbangan dan persetujuan Direksi dan persetujuan Komisaris untuk kebijakan;

f. Coordinating with related work units in preparing and updating internal guidelines related to the implementation of compliance risk management;
g. Identifying and updating compliance risk parameters and profiles in each functional activity and ensuring that the risks have been properly controlled by the related work units;
h. Preparing the Compliance Director's Report, which must be submitted to the regulator or for the supervision needs of the Bank's Board of Directors and Commissioners;
i. Coordinating the submission and monitoring of product licensing applications, activities, and system development of the Bank at the Financial Services Authority and/or Bank Indonesia;
j. Monitoring and analyzing fines from regulators, identifying the root causes of fines and encouraging corrective and/or preventive efforts to prevent the recurrence of sanctions and/or minimize fines;
k. Monitoring the implementation and follow-up of the fulfillment of provisions of laws and regulations that have an impact on the bank;
l. Supervising, coordinating, encouraging and monitoring the implementation of Good Corporate Governance (GCG), the implementation of compliance and sustainable finance at the Bank;
m. Supervising, coordinating, and monitoring the implementation of GCG, the implementation of compliance in the Sinar Mas Group Financial Conglomerate;
n. As the Bank's Liaison Officer to the regulator for the implementation of supervision and inspection by the regulator; and
o. Increasing awareness of the culture of compliance through a compliance campaign program through internal communication media in the form of Compliance Info (Co.In) in the form of infographics that aim to provide an interesting and easy-to-understand refreshment of laws and regulations.

7. Carrying out tasks to ensure the implementation of laws and regulations on Anti-Money Laundering, Prevention of Terrorism Funding and Prevention of Proliferation of Weapons of Mass Destruction (APU, PPT, & PPPSPM) at the Bank, including:
   a. Periodically analyze the risk assessment of Money Laundering (TPPU), Terrorism Financing (TPPT), and/or Proliferation of Weapons of Mass Destruction (PPSPM) related to customers, countries or geographic areas, products, services, transactions or distribution networks;
   b. Prepare, update, and propose policies and procedures for implementing APU, PPT, & PPPSPM programs that have been prepared to manage and mitigate risks based on risk assessments, to request consideration and approval from the Board of Directors and approval from the Commissioner for policies;

c. Melakukan pemantauan dan pengujian terhadap penerapan program APU, PPT & PPPSPM yang berdampak pada Bank dan unit kerja terkait;
d. Melakukan pemantauan terhadap ketentuan Regulator dan peraturan penerapan program APU, PPT & PPPSPM yang berlaku;
e. Melakukan kajian dan/atau memberikan opini/ *advice* terhadap produk/layanan, ketentuan internal, formulir transaksi keuangan dan non-keuangan;
f. Memantau pengkinian profil nasabah;
g. Memastikan adanya sistem yang dapat mengidentifikasi, menganalisis, memantau, dan menyediakan laporan secara efektif mengenai karakteristik transaksi yang dilakukan oleh nasabah;
h. Memantau dan menganalisis terhadap rekening nasabah yang tidak sesuai dengan profil, karakteristik, dan/atau kebiasaan pola transaksi nasabah;
i. Melakukan evaluasi terhadap skenario/parameter pemantauan transaksi nasabah sesuai dengan modus/tipologi yang berkembang;
j. Memelihara, *mereview*, mengkinikan, serta mensosialisasikan secara berkala kriteria risiko Bank berdasarkan pekerjaan, bidang usaha, negara/ kewarganegaraan, dan produk/layanan;
k. Memelihara, mengkinikan daftar terduga teroris dan organisasi teroris, daftar pendanaan proliferasi senjata pemusnah massal, serta daftar lainnya untuk kepentingan penerapan program APU, PPT & PPPSPM serta memastikan identifikasi serta pemeriksaan daftar-daftar dimaksud terhadap *database* nasabah Bank sebelum proses pembukaan hubungan usaha, secara *ad hoc* maupun berkala;
l. Menerima, melakukan analisis, dan menyusun laporan transaksi keuangan mencurigakan dan/atau transaksi keuangan yang dilakukan secara tunai yang disampaikan oleh satuan kerja;
m. Melaporkan Transaksi Keuangan Mencurigakan (LTKM), Transaksi Keuangan Tunai (LTKT), Transaksi Transfer Dana dari dan ke Luar Negeri (LTKL), Laporan Sistem Informasi Pengguna Jasa Terpadu (SIPESAT), Sistem Informasi Terduga Pendanaan Terorisme (SIPENDAR), Sistem Informasi Program Anti Pencucian Uang dan Pendanaan Terorisme (SIGAP), Laporan *Individual Risk Assessment* (IRA), laporan rencana dan realisasi pengkinian data, laporan APU, PPT & PPPSPM di Aplikasi Pelaporan *Online* Otoritas Jasa Keuangan (APOLO) sesuai ketentuan regulator yang berlaku;
n. Menyusun laporan untuk kepentingan manajemen Bank serta memenuhi kewajiban pelaporan ke regulator antara lain namun tidak terbatas pada Transaksi Keuangan Mencurigakan (LTKM), Transaksi Keuangan Tunai (LTKT), Transaksi Transfer Dana dari dan ke Luar Negeri (LTKL), Laporan Sistem Informasi Pengguna Jasa Terpadu (SIPESAT), Sistem Informasi Terduga Pendanaan Terorisme (SIPENDAR), Sistem Informasi Program Anti Pencucian Uang dan Pendanaan

c. Monitor and test the implementation of APU, PPT & PPPSPM programs that have an impact on the Bank and related work units;
d. Monitor the provisions of the Regulator and applicable regulations for implementing APU, PPT & PPPSPM programs;
e. Conduct studies and/or provide opinions/advice on products/services, internal provisions, financial and non-financial transaction forms;
f. Monitor customer profile updates;
g. Ensure the existence of a system that can identify, analyze, monitor, and provide effective reports on the characteristics of transactions carried out by customers;
h. Monitor and analyze customer accounts that do not match the profile, characteristics, and/or transaction pattern habits of customers;
i. Evaluate scenarios/parameters for monitoring customer transactions in accordance with the developing mode/typology;
j. Maintain, review, update, and periodically socialize the Bank's risk criteria based on occupation, business field, country/citizenship, and products/services;
k. Maintain, update the list of suspected terrorists and terrorist organizations, the list of financing proliferation of weapons of mass destruction, and other lists for the purposes of implementing the APU, PPT & PPPSPM programs and ensure the identification and examination of the lists in question against the Bank's customer database before the process of opening a business relationship, either ad hoc or periodically;
l. Receive, analyze, and compile reports on suspicious financial transactions and/or financial transactions carried out in cash submitted by the work unit;
m. Reporting Suspicious Financial Transactions (LTKM), Cash Financial Transactions (LTKT), Overseas Fund Transfer Transactions (LTKL), Integrated Service User Information System Reports (SIPESAT), Suspected Terrorism Funding Information System (SIPENDAR), Anti-Money Laundering and Terrorism Funding Program Information System (SIGAP), Individual Risk Assessment (IRA) Reports, data update plan and realization reports, APU, PPT & PPPSPM reports in the Financial Services Authority Online Reporting Application (APOLO) in accordance with applicable regulatory provisions;
n. Prepare reports for the benefit of Bank management and fulfill reporting obligations to regulators including but not limited to Suspicious Financial Transactions (LTKM), Cash Financial Transactions (LTKT), Overseas and Foreign Fund Transfer Transactions (LTKL), Integrated Service User Information System Reports (SIPESAT), Suspected Terrorism Funding Information System (SIPENDAR), Anti-Money Laundering and Terrorism Funding Program Information System

Terorisme (SIGAP), Laporan *Individual Risk Assessment* (IRA), laporan rencana dan realisasi pengkinian data, laporan APU, PPT & PPPSPM di Aplikasi Pelaporan *Online* Otoritas Jasa Keuangan (APOLO);

o. Melakukan pengawasan kuantitas pelaporan terhadap Laporan Transaksi Keuangan Mencurigakan (LTKM), Laporan Transaksi Keuangan Tunai (LTKT) & Laporan Transaksi Keuangan Transfer Dana dari dan ke Luar Negeri (LTKL) dan pengawasan kualitas pemantauan alert & Laporan Transaksi Keuangan Mencurigakan (LTKM);

p. Memantau, menganalisis, dan merekomendasikan kebutuhan pelatihan tentang penerapan program APU, PPT & PPPSPM bagi pejabat dan/atau pegawai Bank;

q. Melakukan supervisi, mengkoordinasi, mendorong, serta memantau penerapan ketentuan APU, PPT & PPPSPM pada Bank maupun konglomerasi keuangan Sinar Mas Group;

r. Sebagai *Liaison Officer* Bank ke regulator, antara lain pada aktivitas pengawasan dan pemeriksaan Bank oleh regulator;

s. Melakukan review dan/atau menyusun ketentuan internal, kertas kerja dan alat bantu aktivitas kepatuhan dan penerapan program APU, PPT, dan PPPSPM (termasuk untuk uji kepatuhan);

t. Melaksanakan implementasi *Quality Control* (QC) pengawasan terhadap kuantitas dan Quality Assurance (QA) pengawasan terhadap kualitas pelaporan APU, PPT, dan PPPSPM; dan

u. Menyiapkan program dan materi pelatihan dan sosialisasi kepatuhan serta memastikan penyampaiannya kepada karyawan dan unit kerja Bank termasuk untuk penerapan program APU, PPT, dan PPPSPM;

8. Membangun data *base* peraturan regulator yang berkaitan dengan bisnis Perusahaan secara lengkap dan terkini.
9. Menyebarkan referensi kepatuhan dan mensosialisasikannya.
10. Berfungsi sebagai tempat berdiskusi seluruh karyawan mengenai hal-hal yang terkait dengan peraturan regulator, serta tempat berdiskusi dengan satuan kerja hukum terkait peraturan perundang-undangan yang berkaitan dengan peraturan regulator. Dalam pelaksanaan fungsi ini, Satuan Kerja Kepatuhan dapat meminta bantuan para ahli dari dalam maupun dari luar Bank sesuai dengan pertanyaan yang diajukan.
11. Memiliki wewenang untuk melakukan pemeriksaan langsung ke unit bisnis maupun unit pendukung (uji kepatuhan). Dalam melakukan pemeriksaan wewenang yang diberikan meliputi akses untuk memeriksa semua bukti transaksi, catatan maupun dokumen.
12. Secara proaktif, Satuan Kerja Kepatuhan mengidentifikasi risiko kepatuhan yang melekat pada setiap transaksi termasuk dengan adanya produk dan/atau transaksi baru.

(SIGAP), Individual Risk Assessment (IRA) Reports, data update plan and realization reports, APU, PPT & PPPSPM reports in the Financial Services Authority Online Reporting Application (APOLO);

o. Supervise the quantity of reporting on Suspicious Financial Transaction Reports (LTKM), Cash Financial Transaction Reports (LTKT) & Overseas Fund Transfer Transaction Reports (LTKL) and supervise the quality of alert monitoring & Suspicious Financial Transaction Reports (LTKM);

p. Monitor, analyze, and recommend training needs on the implementation of APU, PPT & PPPSPM programs for Bank officials and/or employees;

q. Supervise, coordinate, encourage, and monitor the implementation of APU, PPT & PPPSPM provisions at the Bank and the Sinar Mas Group financial conglomerate;

r. As the Bank's Liaison Officer to the regulator, including in the Bank's supervision and inspection activities by the regulator;

s. Review and/or prepare internal provisions, working papers and tools for compliance activities and the implementation of APU, PPT, and PPPSPM programs (including for compliance tests);

t. Implement Quality Control (QC) supervision of quantity and Quality Assurance (QA) supervision of the quality of APU, PPT, and PPPSPM reporting; and

u. Prepare training programs and materials and socialization of compliance and ensure their delivery to employees and work units of the Bank including for the implementation of APU, PPT, and PPPSPM programs;

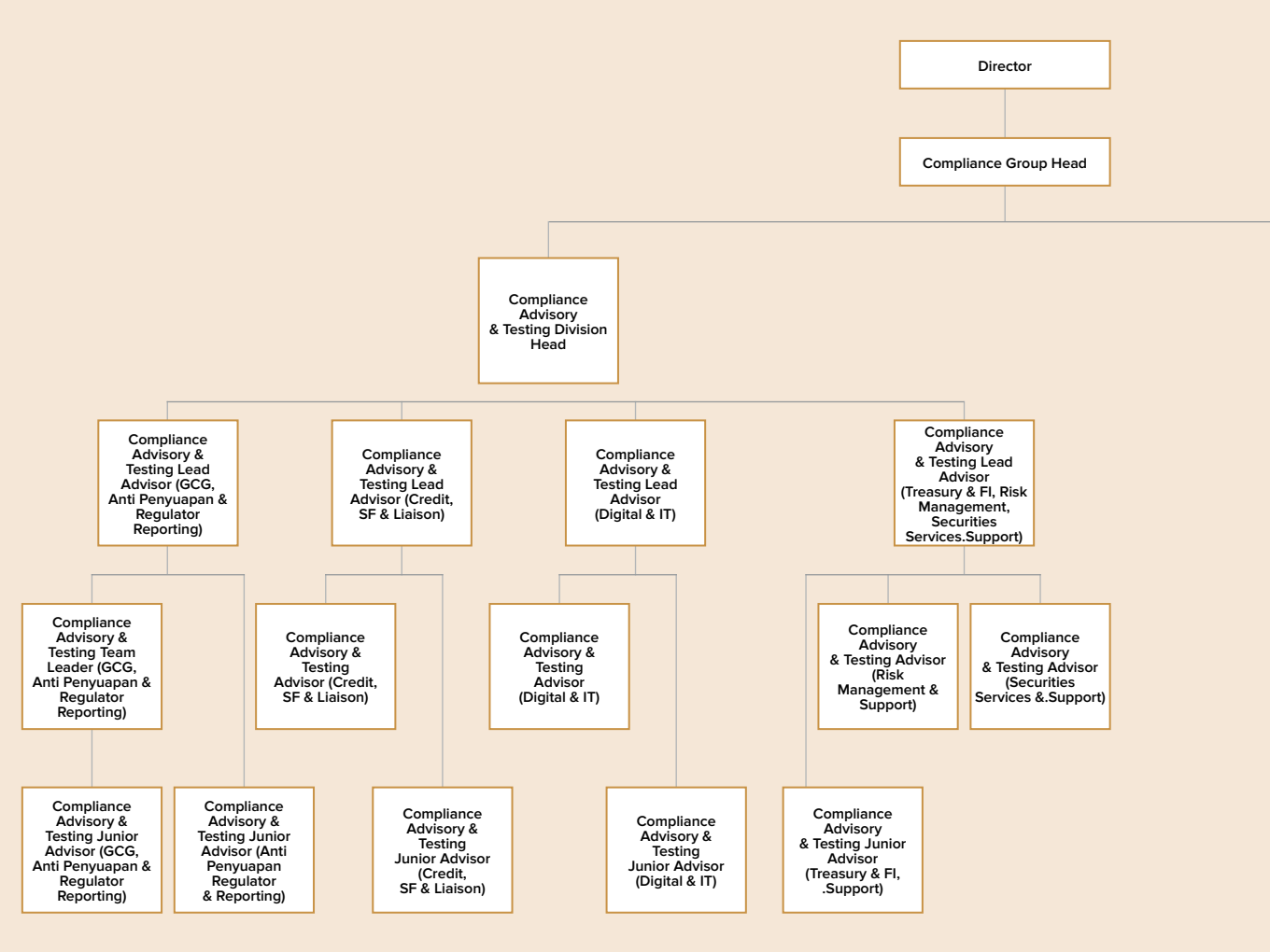
8. Build a complete and up-to-date database of regulatory regulations related to the Company's business.
9. Disseminate compliance references and disseminate them.
10. Serve as a place for all employees to discuss matters related to regulatory regulations, as well as a place to discuss with the legal work unit regarding laws and regulations related to regulatory regulations. In carrying out this function, the Compliance Work Unit can request assistance from experts from within or outside the Bank according to the questions asked.
11. Have the authority to conduct direct inspections of business units and supporting units (compliance tests). In conducting inspections, the authority granted includes access to examine all transaction evidence, records and documents.
12. Proactively, the Compliance Work Unit identifies compliance risks inherent in each transaction including the existence of new products and/or transactions.

13. Melakukan pemantauan dan memberikan masukan, usulan maupun opini dan klarifikasi terhadap praktik yang dilakukan oleh Bank. Terhadap praktik yang tidak sesuai dengan peraturan regulator yang berlaku, Satuan Kerja Kepatuhan memiliki wewenang kepada unit kerja meminta dilakukannya tindakan perbaikan yang diperlukan.
14. Melakukan koordinasi secara berkala kepada Satuan Kerja Manajemen Risiko terkait risiko kepatuhan yang berpotensi dan berdampak terhadap sanksi kepada Bank secara umum.
15. Bertindak sebagai penghubung Perusahaan dengan pihak otoritas/regulator atau pihak lain yang memiliki wewenang untuk melakukan pengawasan terhadap Bank dan/atau membuat peraturan yang memiliki dampak pada Bank.
16. Melakukan kaji ulang dan/atau merekomendasikan pengkinian dan penyempurnaan kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank agar sesuai dengan ketentuan regulator, khususnya Otoritas Jasa Keuangan dan Bank Indonesia.
17. Melakukan upaya untuk memastikan bahwa kebijakan, ketentuan, sistem dan prosedur, serta kegiatan usaha Bank telah sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan regulator lainnya.
18. Melakukan identifikasi, pengukuran, pemantauan, dan pengendalian terhadap Risiko Kepatuhan dengan mengacu pada ketentuan OJK penerapan manajemen riisko bagi Bank Umum. Dalam rangka melakukan proses pengelolaan Risiko Kepatuhan, satuan kerja kepatuhan berkoordinasi dengan satuan kerja manajemen risiko.
19. Menilai dan mengevaluasi efektivitas, kecukupan, dan kesesuaian kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank dengan ketentuan peraturan perundang-undangan, antara lain menilai rancangan kebijakan, ketentuan, sistem maupun prosedur baru, berinisiatif untuk melakukan penyempurnaan kebijakan, ketentuan, sistem maupun prosedur berdasarkan informasi yang diperoleh.
20. Melakukan sosialisasi dan/atau pelatihan mengenai peraturan perundang-undangan yang diterbitkan oleh BI dan/atau OJK maupun otoritas lainnya yang berwenang kepada seluruh unit kerja yang terkait untuk meningkatkan pemahaman dan kesadaran kepatuhan karyawan.
21. Menindaklanjuti setiap permintaan BI dan/atau OJK maupun otoritas lainnya dalam menyediakan informasi/ data dalam rangka pengawasan Bank.
22. Menindaklanjuti setiap temuan audit BI dan/atau OJK maupun otoritas lainnya serta menyelesaikannya sesuai dengan komitmen yang telah disepakati dengan berkoordinasi dengan unit kerja terkait.

13. Monitor and provide input, suggestions or opinions and clarifications on practices carried out by the Bank. For practices that are not in accordance with applicable regulatory regulations, the Compliance Work Unit has the authority to the work unit to request that necessary corrective actions be taken.
14. Conduct regular coordination with the Risk Management Work Unit regarding compliance risks that have the potential to have an impact on sanctions for the Bank in general.
15. Act as a liaison between the Company and the authorities/regulators or other parties who have the authority to supervise the Bank and/or make regulations that have an impact on the Bank.
16. Conduct reviews and/or recommend updates and improvements to policies, provisions, systems and procedures owned by the Bank to comply with regulatory provisions, especially the Financial Services Authority and Bank Indonesia.
17. Make efforts to ensure that the Bank's policies, provisions, systems and procedures, as well as business activities are in accordance with the provisions of the Financial Services Authority and other regulatory provisions.
18. Conduct identification, measurement, monitoring and control of Compliance Risk by referring to OJK provisions on the implementation of risk management for Commercial Banks. In order to carry out the Compliance Risk management process, the compliance work unit coordinates with the risk management work unit.
19. Assess and evaluate the effectiveness, adequacy, and suitability of policies, provisions, systems and procedures owned by the Bank with the provisions of laws and regulations, including assessing drafts of new policies, provisions, systems and procedures, taking the initiative to improve policies, provisions, systems and procedures based on the information obtained.
20. Conduct socialization and/or training regarding laws and regulations issued by BI and/or OJK or other authorized authorities to all related work units to improve employee compliance understanding and awareness.
21. Follow up on every request from BI and/or OJK or other authorities in providing information/data for the purpose of Bank supervision.
22. Follow up on every audit finding from BI and/or OJK or other authorities and resolve it in accordance with the agreed commitment by coordinating with related work units.

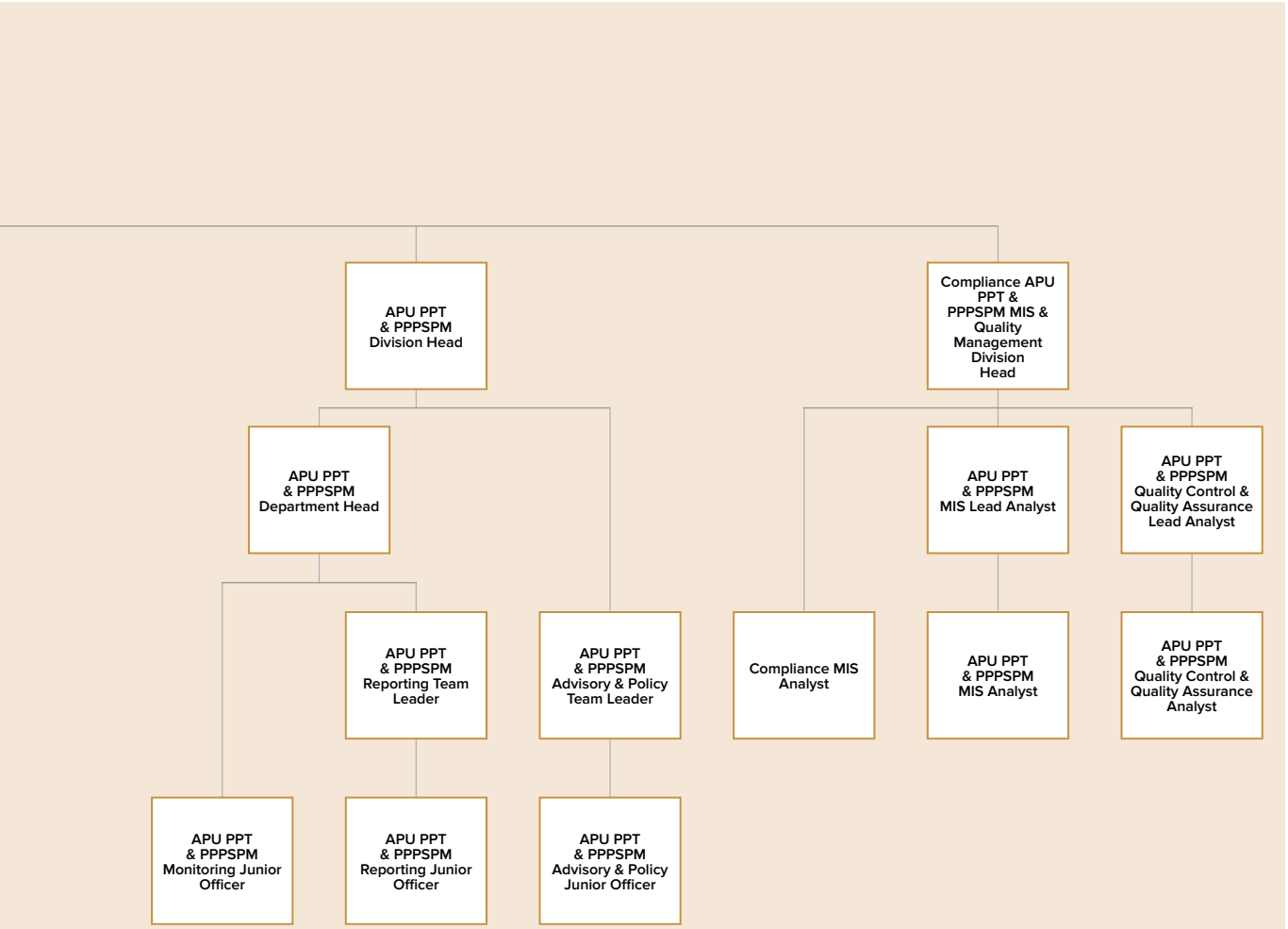
## Struktur Organisasi Kepatuhan

## Compliance Organization Structure




SKK terdiri dari 3 Divisi sebagai berikut.

1. Divisi *Compliance Advisory & Testing*
2. Divisi APU, PPT, & PPPSPM.
3. Divisi *Compliance*, APU, PPT, & PPPSPM, MIS & *Quality Management*.




SKK terdiri dari 3 Divisi sebagai berikut.

1. Divisi *Compliance Advisory & Testing*
2. Divisi APU, PPT, & PPPSPM.
3. Divisi *Compliance*, APU, PPT, & PPPSPM, MIS & *Quality Management*.

## Profil Kepala SKK

## Profile of SKK Head



**Theresia Tyas Piwi**
Pjs Compliance Group Head
Acting Compliance Group Head

**Kewarganegaraan | Citizenship**
Indonesia

**Domisili | Domicile**
Jakarta

**Usia | Age**
34 tahun | years old

**Dasar Hukum Pengangkatan**
**Legal Basis for Appointment**

SK.075/2024/PRESDIR-HCM

**Riwayat Pendidikan | Educational Background**
- S1 Akuntansi – Universitas Atma Jaya Yogyakarta
- S2 Magister Management – Universitas Atmajaya Yogyakarta
- S1 Accounting – Universitas Atma Jaya Yogyakarta
- S2 Magister Management – Universitas Atma Jaya Yogyakarta

**Riwayat Pekerjaan | Work Experience**
1. Oktober 2013 – Juni 2014: MDP 42 Bank Sinarmas
2. Juni 2014 - Maret 2018 : Account Officer Corporate Banking KCU Jakarta Thamrin
3. April 2018 - Mei 2021 : Corporate Credit Analyst KPNO
4. Juni 2021 - Juli 2021 : Corporate Credit Analyst & Policy Division Head KPNO
5. Agustus 2021 : Compliance Advisory & Testing Division Head (Corporate Business & Enterprise) KPNO
6. September 2021 - November 2022 : Compliance Advisory & Testing Division Head (GCG, Anti Penyuapan, Sustainable Finance, Regulatory Reporting & Liaison, & Credit) KPNO
7. Desember 2022 - Maret 2024 : Compliance Advisory & Testing Division Head (GCG, Anti Penyuapan, SF, Credit, Digital & IT) KPNO
8. April 2024 - Desember 2024 : Compliance Advisory & Testing Division Head KPNO

1. October 2013 – June 2014: MDP 42 Bank Sinarmas
2. June 2014 - March 2018: Account Officer Corporate Banking KCU Jakarta Thamrin
3. April 2018 - May 2021: Corporate Credit Analyst KPNO
4. June 2021 - July 2021: Corporate Credit Analyst & Policy Division Head KPNO
5. August 2021: Compliance Advisory & Testing Division Head (Corporate Business & Enterprise) KPNO
6. September 2021 - November 2022: Compliance Advisory & Testing Division Head (GCG, Anti Bribery, Sustainable Finance, Regulatory Reporting & Liaison, & Credit) KPNO
7. December 2022 - March 2024: Compliance Advisory & Testing Division Head (GCG, Anti Bribery, SF, Credit, Digital & IT) KPNO
8. April 2024 - December 2024 : Compliance Advisory & Testing Division Head KPNO

**Rangkap Jabatan | Concurrent Position**
Tidak merangkap jabatan, baik pada bank, perusahaan, dan/atau lembaga lain.
Does not hold concurrent positions, either in banks, companies, and/or other institutions.

**Sertifikasi Profesi | Professional Certification**
Sertifikasi UKMR Jenjang 5
UKMR Level 5 Certification

**Hubungan Afiliasi | Affiliated Relationship**
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.
Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders.

## Pengembangan Kompetensi Satuan Kerja Kepatuhan

Bank Sinarmas memfasilitasi personel SKK, baik kepala maupun SDM di lingkungan SKK, untuk mengikuti berbagai program pengembangan kompetensi. Langkah ini dilakukan untuk memastikan personel SKK memiliki kompetensi yang diperlukan untuk menjalankan perannya secara efektif dalam mendukung kesuksesan dan keberlanjutan Bank. Informasi mengenai program pengembangan kompetensi personel SKK pada tahun 2024 diungkapkan sebagai berikut.

## Compliance Work Unit Competency Development

Bank Sinarmas facilitates SKK personnel, both heads and HR within the SKK environment, to participate in various competency development programs. This step is taken to ensure that SKK personnel have the competencies needed to carry out their roles effectively in supporting the success and sustainability of the Bank. Information regarding the SKK personnel competency development program in 2024 is disclosed as follows.

## Pengembangan Kompetensi Kepala Satuan Kerja Kepatuhan

## Competency Development for the Head of the Compliance Work Unit

| Materi Pengembangan Kompetensi<br>Competency Development Materials | Tanggal Mulai<br>Start Date | Tanggal Selesai<br>End Date | Tempat Pelaksanaan<br>Venue | Penyelenggara<br>Organizer |
|---|---|---|---|---|
| *Connecting the Dots* | 11 Januari 2024<br>January 11, 2024 | 11 Januari 2024<br>January 11, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| *Fraud Awareness* | 15 Januari 2024<br>January 15, 2024 | 15 Maret 2024<br>March 15, 2024 | *E-Learning* | Bank Sinarmas |
| *Motivational Session : Dream T.E.A.M* | 26 Januari 2024<br>January 26, 2024 | 26 Januari 2024<br>January 26, 2024 | Jakarta | Bank Sinarmas |
| *Training Google Workspace* | 19 Februari 2024<br>February 19, 2024 | 19 Februari 2024<br>February 19, 2024 | Jakarta | Bank Sinarmas |
| *Outlook* Ekonomi dan Keuangan di Tahun 2024 | 22 Februari 2024<br>February 22, 2024 | 22 Februari 2024<br>February 22, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| Strategi Mencegah Serangan Siber | 29 Februari 2024<br>February 29, 2024 | 29 Februari 2024<br>February 29, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| *Indonesian Banking Road to Net Zero Emission* | 4 Maret 2024<br>March 4, 2024 | 4 Maret 2024<br>March 4, 2024 | Jakarta | Otoritas Jasa Keuangan - OJK |
| *Artificial Intelligence Changes The Face of The Financial Sector* | 7 Maret 2024<br>March 7, 2024 | 7 Maret 2024<br>March 7, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| Kode Etik & Kebijakan Perlindungan Nasabah<br>Code of Ethics and Customer Protection Policy | 13 Maret 2024<br>March 13, 2024 | 11 Mei 2024<br>May 11, 2024 | *Online Training* | Bank Sinarmas |
| Panduan *Climate Risk Management and Scenario Analysis*<br>Climate Risk Management and Scenario Analysis Guidelines | 28 Maret 2024<br>March 28, 2024 | 28 Maret 2024<br>March 28, 2024 | Jakarta | Otoritas Jasa Keuangan - OJK |
| Dampak Konglomerasi Bank Terhadap Kinerja dan Stabilitas<br>Impact of Bank Conglomeration on Performance and Stability | 23 April 2024<br>April 23, 2024 | 23 April 2024<br>April 23, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| *Open Class : High Heels And High Goals: Climbing the Career Journey Without Pause* | 24 April 2024<br>April 24, 2024 | 24 April 2024<br>April 24, 2024 | *Online Training* | Bank Sinarmas |
| *Governance, Risk, And Control* | 6 Mei 2024<br>May 6, 2024 | 6 Mei 2024<br>May 6, 2024 | Jakarta | Bank Sinarmas |
| *GRC Sharing Session* | 7 Mei 2024<br>May 7, 2024 | 7 Mei 2024<br>May 7, 2024 | Jakarta | Bank Sinarmas |
| Pembekalan Masa Persiapan Pensiun (MPP ) Bagi Karyawan Bank Sinarmas<br>Provision for Retirement Preparation Period (MPP) for Bank Sinarmas Employees | 20 Mei 2024<br>May 20, 2024 | 22 Mei 2024<br>May 22, 2024 | Jakarta | Bank Sinarmas |
| *Security Awareness* 2024 | 27 Mei 2024<br>May 27, 2024 | 16 Agustus 2024<br>August 16, 2024 | *Online Training* | Bank Sinarmas |
| Rancangan SKKNII Manajemen Risiko Perbankan<br>Draft of SKKNII Banking Risk Management | 4 Juni 2024<br>June 4, 2024 | 4 Juni 2024<br>June 4, 2024 | Cirebon | Otoritas Jasa Keuangan - OJK |
| Peraturan Pemerintah Tentang Perlindungan Data Pribadi<br>Government Regulation on Personal Data Protection | 5 Juni 2024<br>June 5, 2024 | 5 Juni 2024<br>June 5, 2024 | *Online Training* | Forum Komunikasi Direktur Kepatuhan Perbankan - FKDKP |
| *Climate Risk Management Policy Development* | 28 Juni 2024<br>June 28, 2024 | 28 Juni 2024<br>June 28, 2024 | Jakarta | Otoritas Jasa Keuangan - OJK |
| *Enterprise Architecture Jumpstart* | 5 Agustus 2024<br>August 5, 2024 | 8 Agustus 2024<br>August 8, 2024 | Jakarta | Bank Sinarmas |
| Pendidikan Peningkatan Kompetensi dengan Topik *Liquidity Risk Management*<br>Competency Enhancement Education with the Topic of Liquidity Risk Management | 23 Agustus 2024<br>August 23, 2024 | 23 Agustus 2024<br>August 23, 2024 | *Online Training* | Perkumpulan Wakil Manajer Investasi Indonesia (PWMII) |
| *Untold Story* | 23 Agustus 2024<br>August 23, 2024 | 23 Agustus 2024<br>August 23, 2024 | *Online Training* | Bank Sinarmas |
| *Town Hall Meeting Q2-2024* | 30 Agustus 2024<br>August 30, 2024 | 30 Agustus 2024<br>August 30, 2024 | Jakarta | Bank Sinarmas |
| *Customer Centricity - The Cornerstone of Sustainable Business Growth* | 3 September 2024<br>September 3, 2024 | 5 September 2024<br>September 5, 2024 | Jakarta | Bank Sinarmas |

| Materi Pengembangan Kompetensi<br>Competency Development Materials | Tanggal Mulai<br>Start Date | Tanggal Selesai<br>End Date | Tempat Pelaksanaan<br>Venue | Penyelenggara<br>Organizer |
|---|---|---|---|---|
| Pendidikan Peningkatan Berkelanjutan<br>Continuous Improvement Education | 4 September 2024<br>September 4, 2024 | 4 September 2024<br>September 4, 2024 | *Online Training* | Perkumpulan Wakil Manajer Investasi Indonesia (PWMII) |
| Undang-undang Perlindungan Data Pribadi<br>Personal Data Protection Act | 6 September 2024<br>September 6, 2024 | 6 September 2024<br>September 6, 2024 | Jakarta | Bank Sinarmas |
| Kerangka Kerja Terbaru Risiko Pasar *Fundamental Review of Trading Book* (FRTB)<br>Latest Framework Fundamental Market Risk Review of Trading Book (FRTB) | 10 September 2024<br>September 10, 2024 | 11 September 2024<br>September 11, 2024 | Jakarta | Bank Sinarmas |
| *AI Day Worshop* | 18 September 2024<br>September 18, 2024 | 18 September 2024<br>September 18, 2024 | *Jakarta* | Bank Sinarmas |
| Pelatihan Kompetensi Sertifikasi *Certified Anti Fraud Governance* (CAFG)<br>Certified Anti Fraud Governance (CAFG) Certification Competency Training | 19 September 2024<br>September 19, 2024 | 20 September 2024<br>September 20, 2024 | *Online Training* | GRC Management |
| Uji Kompetensi Sertifikasi CAFG<br>CAFG Certification Competency Test | 23 September 2024<br>September 23, 2024 | 23 September 2024<br>September 23, 2024 | Jakarta | GRC Management |
| *Training* Coso ERM | 25 September 2024<br>September 25, 2024 | 26 September 2024<br>September 26, 2024 | Jakarta | Bank Sinarmas |
| *Seminar Climate Risk* | 21 Oktober 2024<br>October 21, 2024 | 21 Oktober 2024<br>October 21, 2024 | Jakarta | Otoritas Jasa Keuangan - OJK |
| Workshop Menyusn *Financial Contingency Plan*<br>Workshop on Preparing a Financial Contingency Plan | 29 Oktober 2024<br>October 29, 2024 | 30 Oktober 2024<br>October 30, 2024 | *Online Training* | GRC Management |
| *Product Workshop* | 5 November 2024<br>November 5, 2024 | 6 November 2024<br>November 6, 2024 | Jakarta | Bank Sinarmas |
| *APG Typologies Workshop* | 11 November 2024<br>November 11, 2024 | 13 November 2024<br>November 13, 2024 | Kuala Lumpur | SCRUM ASIA PASIFIK |
| Memerangi Judi *Online* dan Kejahatan Baru di Era Transaksi Digital 5.0<br>Combating Online Gambling and New Crimes in the Era of Digital Transactions 5.0 | 19 November 2024<br>November 19, 2024 | 19 November 2024<br>November 19, 2024 | Jakarta | Pusat Pelaporan dan Analisis Transaksi Keuangan - PPATK |
| *Risk and Governance Summit 2024: Strengthening The GRC Ecosystem in The Financial Sector to Support the Golden Indonesia 2024 Vision* | 26 November 2024<br>November 26, 2024 | 26 November 2024<br>November 26, 2024 | Jakarta | Otoritas Jasa Keuangan - OJK |
| Resolusi & *Recovery Plan*<br>Resolution & Recovery Plan | 28 November 2024<br>November 28, 2024 | 29 November 2024<br>November 29, 2024 | Jakarta | Bank Sinarmas |
| APU, PPT, & PPPSPM | 27 Desember 2024<br>December 27, 2024 | 31 Desember 2024<br>December 31, 2024 | Jakarta | Bank Sinarmas |

## Pelatihan Internal Satuan Kerja Kepatuhan
### Internal Compliance Work Unit Training

| Materi Pengembangan Kompetensi<br>Competency Development Materials | Tanggal Mulai<br>Start Date | Tanggal Selesai<br>End Date | Tempat Pelaksanaan<br>Venue | Penyelenggara<br>Organizer |
|---|---|---|---|---|
| *Open Class* : Pemahaman *Sustainability* Dan Peraturan OJK Tentang Keuangan Berkelanjutan<br>Open Class: Understanding Sustainability and OJK Regulations on Sustainable Finance | 10 Januari 2024<br>January 10, 2024 | 10 Januari 2024<br>January 10, 2024 | Jakarta | Bank Sinarmas |
| MDP: *Modul Banking Business (Lending)* | 12 Januari 2024<br>January 12, 2024 | 19 Februari 2024<br>February 19, 2024 | Jakarta | Bank Sinarmas |
| Sosialisasi Pengkinian Sandi Sektor Ekonomi pada Sistem Bank<br>Socialization of Updating Economic Sector Codes in the Banking System | 12 Januari 2024<br>January 12, 2024 | 12 Januari 2024<br>January 12, 2024 | *Online Training* | Bank Sinarmas |
| *Fraud Awareness* | 15 Januari 2024<br>January 15, 2024 | 15 Maret 2024<br>March 15, 2024 | *E-Learning* | Bank Sinarmas |
| GWS *Collaborations Tools* | 16 Januari 2024<br>January 16, 2024 | 16 Januari 2024<br>January 16, 2024 | Jakarta | Bank Sinarmas |
| *Refreshment* Pengisian Kertas Kerja Self Assesment APU, PPT, dan PPPSPM<br>Refreshment of Filling in the Self Assessment APU, PPT, and PPPSPM Working Papers | 18 Januari 2024<br>January 18, 2024 | 18 Januari 2024<br>January 18, 2024 | *Online Training* | Bank Sinarmas |

| Materi Pengembangan Kompetensi<br>Competency Development Materials | Tanggal Mulai<br>Start Date | Tanggal Selesai<br>End Date | Tempat Pelaksanaan<br>Venue | Penyelenggara<br>Organizer |
|---|---|---|---|---|
| Teknik dan Cara Efisien dalam Penyusunan Kebijakan dan Prosedur (SOP) Perbankan Sesuai POJK No. 18/POJK.03/2016<br>Efficient Techniques and Methods in Preparing Banking Policies and Procedures (SOP) According to POJK No. 18/POJK.03/2016 | 18 Januari 2024<br>January 18, 2024 | 19 Januari 2024<br>January 19, 2024 | Jakarta | Bank Sinarmas |
| *Motivational Session : Dream T.E.A.M* | 26 Januari 2024<br>January 26, 2024 | 26 Januari 2024<br>January 26, 2024 | *Online Training* | Bank Sinarmas |
| *Google Workspace for Communication (Self Learning)* | 31 Januari 2024<br>January 31, 2024 | 6 Februari 2024<br>February 6, 2024 | *E-Learning* | Bank Sinarmas |
| Podcast : Ketika Perselisihan Terjadi Dalam Hubungan Industrial, Harus Gimana Donkkk?!<br>Podcast: When Disputes Occur in Industrial Relations, What Should We Do?! | 31 Januari 2024<br>January 31, 2024 | 31 Januari 2024<br>January 31, 2024 | *Online Training* | Bank Sinarmas |
| *Relationship Manager Development Program - RMDP* | 5 Februari 2024<br>February 5, 2024 | 14 Juni 2024<br>June 14, 2024 | Jakarta | Bank Sinarmas |
| Podcast : Sedia Payung Sebelum Cuan<br>Podcast: Prepare an Umbrella Before Profit | 7 Februari 2024<br>February 7, 2024 | 7 Februari 2024<br>February 7, 2024 | *Online Training* | Bank Sinarmas |
| Program Binus *Internship*<br>Binus Internship Program | 16 Februari 2024<br>February 16, 2024 | 29 Februari 2024<br>February 29, 2024 | Jakarta | Bank Sinarmas |
| STOP OVERTHINKING! Jangan Takut Sama Tantangan di Dunia Kerja<br>STOP OVERTHINKING! Don't Be Afraid of Challenges in the World of Work | 16 Februari 2024<br>February 16, 2024 | 16 Februari 2024<br>February 16, 2024 | *Online Training* | Bank Sinarmas |
| *Refreshment* APU PPT, Identifikasi *Beneficial Owner*<br>*APU PPT Refreshment, Identifying Beneficial Owners* | 19 Februari 2024<br>February 19, 2024 | 19 Februari 2024<br>February 19, 2024 | *Online Training* | Bank Sinarmas |
| *Training Google Workspace* | 19 Februari 2024<br>February 19, 2024 | 19 Februari 2024<br>February 19, 2024 | Jakarta | Bank Sinarmas |
| *Trainer's Leveraging Competency* | 27 Februari 2024<br>February 27, 2024 | 8 Maret 2024<br>March 8, 2024 | *Online Training* | Bank Sinarmas |
| Re-sertifikasi Manajemen Risiko Jenjang 5<br>Re-certification of Risk Management Level 5 | 28 Februari 2024<br>February 28, 2024 | 29 Februari 2024<br>February 29, 2024 | *Online Training* | Bank Sinarmas |
| *GWS Champion User* | 29 Februari 2024<br>February 29, 2024 | 29 Februari 2024<br>February 29, 2024 | Jakarta | Bank Sinarmas |
| Sosialisasi Pengisian Kertas Kerja Evaluasi Penerapan APU, PPT, dan PPPSPM Terintegrasi Konglomerasi Keuangan Sinar Mas Tahun 2024<br>Socialization of Completion of Working Paper Evaluation of Integrated APU, PPT, and PPPSPM Implementation of Sinar Mas Financial Conglomerate in 2024 | 29 Februari 2024<br>February 29, 2024 | 29 Februari 2024<br>February 29, 2024 | *Online Training* | Bank Sinarmas |
| *GWS Champion User* | 7 Maret 2024<br>March 7, 2024 | 7 Maret 2024<br>March 7, 2024 | Jakarta | Bank Sinarmas |
| APU, PPT, & PPPSPM | 13 Maret 2024<br>March 13, 2024 | 11 Mei 2024<br>May 11, 2024 | *Online Training* | Bank Sinarmas |
| Kode Etik & Kebijakan Perlindungan Nasabah<br>Code of Ethics and Customer Protection Policy | 13 Maret 2024<br>March 13, 2024 | 11 Mei 2024<br>May 11, 2024 | *Online Training* | Bank Sinarmas |
| Podcast #16 *Tour The Klaim* | 13 Maret 2024<br>March 13, 2024 | 13 Maret 2024<br>March 13, 2024 | *Online Training* | Bank Sinarmas |
| *GWS Champion User* | 14 Maret 2024<br>March 14, 2024 | 14 Maret 2024<br>March 14, 2024 | Jakarta | Bank Sinarmas |
| TOUR THE KLAIM (KACAMATA DAN GIGI) - NgapDate Vol-16 | 14 Maret 2024<br>March 14, 2024 | 14 Maret 2024<br>March 14, 2024 | *Online Training* | Bank Sinarmas |
| Sosialisasi SK Wewenang Komite Kredit *Corporate* dan *Commercial* dan FI<br>Socialization of the Decree on the Authority of the Corporate and Commercial Credit Committee and FI | 15 Maret 2024<br>March 15, 2024 | 15 Maret 2024<br>March 15, 2024 | *Online Training* | Bank Sinarmas |
| *Senior Relationship Officer* | 18 Maret 2024<br>March 18, 2024 | 4 Mei 2024<br>May 4, 2024 | *Online Training* | Bank Sinarmas |
| *GWS Champion User* | 21 Maret 2024<br>March 21, 2024 | 21 Maret 2024<br>March 21, 2024 | Jakarta | Bank Sinarmas |

| Materi Pengembangan Kompetensi<br>Competency Development Materials | Tanggal Mulai<br>Start Date | Tanggal Selesai<br>End Date | Tempat Pelaksanaan<br>Venue | Penyelenggara<br>Organizer |
|---|---|---|---|---|
| Ada Apa Dengan *Certification* Manajemen Risiko - Ngapdate Vol-17<br>What's Up With Risk Management Certification - Ngapdate Vol-17 | 27 Maret 2024<br>March 27, 2024 | 27 Maret 2024<br>March 27, 2024 | *Online Training* | Bank Sinarmas |
| *Fraud Awareness* | 17 April 2024<br>April 17, 2024 | 17 April 2024<br>April 17, 2024 | *Online Training* | Bank Sinarmas |
| *Google Workspace Train The Trainer* | 18 April 2024<br>April 18, 2024 | 18 April 2024<br>April 18, 2024 | Jakarta | Bank Sinarmas |
| Pelatihan Penyusun Laporan *Individual Risk Assessment* (IRA) ke OJK<br>Training for Compiling Individual Risk Assessment (IRA) Reports to OJK | 20 April 2024<br>April 20, 2024 | 27 April 2024<br>April 27, 2024 | Jakarta | Bank Sinarmas |
| *Branch Supervisory Skills* | 22 April 2024<br>April 22, 2024 | 31 Mei 2024<br>May 31, 2024 | *Online Training* | Bank Sinarmas |
| *Open Class : High Heels And High Goals: Climbing The Career Journey Without Pause* | 24 April 2024<br>April 24, 2024 | 24 April 2024<br>April 24, 2024 | *Online Training* | Bank Sinarmas |
| Sertifikasi Manajemen Risiko Jenjang 4<br>Risk Management Certification Level 4 | 24 April 2024<br>April 24, 2024 | 25 April 2024<br>April 25, 2024 | *Online Training* | Bank Sinarmas |
| Re-sertifikasi Manajemen Risiko Jenjang 5<br>Risk Management Re-certification Level 5 | 8 Mei 2024<br>May 8, 2024 | 8 Juni 2024<br>June 8, 2024 | *Online Training* | Bank Sinarmas |
| *Open Class* : Menembus Batas B.I.S.A (Bersyukur, Inisiatif, Sinergi dan Adaptif)<br>Open Class: Breaking Through the B.I.S.A Limits (Gratitude, Initiative, Synergy and Adaptive) | 13 Mei 2024<br>May 13, 2024 | 13 Mei 2024<br>May 13, 2024 | Jakarta | Bank Sinarmas |
| Sertifikasi Manajemen Risiko Jenjang 4<br>Risk Management Certification Level 4 | 13 Mei 2024<br>May 13, 2024 | 14 Mei 2024<br>May 14, 2024 | *Online Training* | Bank Sinarmas |
| *Open Class : Healing The Inner Child* | 14 Mei 2024<br>May 14, 2024 | 14 Mei 2024<br>May 14, 2024 | *Online Training* | Bank Sinarmas |
| Sosialisasi Hasil *Compliance Testing* APU, PPT, dan PPPSPM periode Semester II 2023<br>Socialization of APU, PPT, and PPPSPM Compliance Testing Results for Semester II 2023 | 15 Mei 2024<br>May 15, 2024 | 15 Mei 2024<br>May 15, 2024 | *Online Training* | Bank Sinarmas |
| *Onboarding New Employee (HC Regulation)* | 16 Mei 2024<br>May 16, 2024 | 16 Mei 2024<br>May 16, 2024 | Jakarta | Bank Sinarmas |
| *Podcast : Update* Modus Penipuan Digital Saat Ini | 16 Mei 2024<br>May 16, 2024 | 16 Mei 2024<br>May 16, 2024 | *Online Training* | Bank Sinarmas |
| Re-sertifikasi Manajemen Risiko Jenjang 5<br>Risk Management Level 5 Re-certification | 20 Mei 2024<br>May 20, 2024 | 21 Mei 2024<br>May 21, 2024 | *Online Training* | Bank Sinarmas |
| Sertifikasi Manajemen Risiko Jenjang 4<br>Risk Management Level 4 Certification | 20 Mei 2024<br>May 20, 2024 | 21 Mei 2024<br>May 21, 2024 | *Online Training* | Bank Sinarmas |
| *Security Awareness* 2024 | 27 Mei 2024<br>May 27, 2024 | 16 Agustus 2024<br>August 16, 2024 | *Online Training* | Bank Sinarmas |
| *Refreshment* APU, PPT, dan PPPSPM<br>Refreshment APU, PPT, and PPPSPM | 4 Juni 2024<br>June 4, 2024 | 4 Juni 2024<br>June 4, 2024 | *Online Training* | Bank Sinarmas |
| Re-sertifikasi Manajemen Risiko Jenjang 5<br>Re-certification of Risk Management Level 5 | 6 Juni 2024<br>June 6, 2024 | 6 Juli 2024<br>July 6, 2024 | *Online Training* | Bank Sinarmas |
| *Induction New Joiner* | 10 Juni 2024<br>June 10, 2024 | 30 Juni 2024<br>June 30, 2024 | *Online Training* | Bank Sinarmas |
| Re-sertifikasi Manajemen Risiko Jenjang 5<br>Re-certification of Risk Management Level 5 | 10 Juni 2024<br>June 10, 2024 | 11 Juni 2024<br>June 11, 2024 | *Online Training* | Bank Sinarmas |
| *Sustainable Worklife Greenify Your Hustle* | 12 Juni 2024<br>June 12, 2024 | 12 Juni 2024<br>June 12, 2024 | Jakarta | Bank Sinarmas |
| Re-sertifikasi Manajemen Risiko Jenjang 5<br>Re-certification of Risk Management Level 5 | 13 Juni 2024<br>June 13, 2024 | 14 Juni 2024<br>June 14, 2024 | *Online Training* | Bank Sinarmas |
| Sosialisasi SOP dan SE Kartu Kredit 2024<br>Socialization of SOP and SE Credit Card 2024 | 19 Juni 2024<br>June 19, 2024 | 19 Juni 2024<br>June 19, 2024 | *Online Training* | Bank Sinarmas |
| Re-sertifikasi Manajemen Risiko Jenjang 5<br>Re-certification of Risk Management Level 5 | 20 Juni 2024<br>June 20, 2024 | 21 Juni 2024<br>June 21, 2024 | *Online Training* | Bank Sinarmas |
| Sosialisasi APU, PPT, & PPPSPM (RFI, Pengisian Formulir EDD, Laporan CTR & STR)<br>Socialization of APU, PPT, & PPPSPM (RFI, EDD Form Completion, CTR & STR Reports) | 26 Juni 2024<br>June 26, 2024 | 26 Juni 2024<br>June 26, 2024 | *Online Training* | Bank Sinarmas |

| Materi Pengembangan Kompetensi<br>Competency Development Materials | Tanggal Mulai<br>Start Date | Tanggal Selesai<br>End Date | Tempat Pelaksanaan<br>Venue | Penyelenggara<br>Organizer |
|---|---|---|---|---|
| Identitas Kependudukan Digital Bagi Warga Negara Indonesia<br>Digital ID for Indonesian Citizens | 28 Juni 2024<br>June 28, 2024 | 28 Juni 2024<br>June 28, 2024 | *Online Training* | Bank Sinarmas |
| Sesi *Workshop* GWS *Compliance*, APU, PPT, & PPPSPM dan *Quality Management*<br>GWS Compliance, APU, PPT, & PPPSPM and Quality Management Workshop Session | 3 Juli 2024<br>July 3, 2024 | 3 Juli 2024<br>July 3, 2024 | Jakarta | Bank Sinarmas |
| Sertifikasi Manajemen Risiko Jenjang 4<br>Certification of Risk Management Level 4 | 11 Juli 2024<br>July 11, 2024 | #VALUE! | *Online Training* | Bank Sinarmas |
| Sosialisasi Produk Program Umroh Bagi Karyawan<br>Socialization of Umrah Program Products for Employees | 11 Juli 2024<br>July 11, 2024 | 11 Juli 2024<br>July 11, 2024 | *Online Training* | Bank Sinarmas |
| Sertifikasi Manajemen Risiko Jenjang 5<br>Re-certification of Risk Management Level 5 | 19 Juli 2024<br>July 19, 2024 | 19 Juli 2024<br>July 19, 2024 | Jakarta | Bank Sinarmas |
| *Onboarding New Employee* | 1 Agustus 2024<br>August 1, 2024 | 1 Agustus 2024<br>August 1, 2024 | Jakarta | Bank Sinarmas |
| Panduan Kesiapsiagaan Tindak Darurat<br>Emergency Preparedness Guide | 1 Agustus 2024<br>August 1, 2024 | 30 September 2024<br>September 30, 2024 | *Online Training* | Bank Sinarmas |
| *Induction New Joiner* | 5 Agustus 2024<br>August 5, 2024 | 30 Agustus 2024<br>August 30, 2024 | *Online Training* | Bank Sinarmas |
| *Training Leveraging Competency (lesson Development And Delevery Pahase)* | 7 Agustus 2024<br>August 7, 2024 | 21 Agustus 2024<br>August 21, 2024 | *Jakarta* | Bank Sinarmas |
| Re-sertifikasi Manajemen Risiko Jenjang 5<br>Re-certification of Risk Management Level 5 | 8 Agustus 2024<br>August 8, 2024 | 9 Agustus 2024<br>August 9, 2024 | *Online Training* | Bank Sinarmas |
| *Planning And Organizing For Division Head* | 9 Agustus 2024<br>August 9, 2024 | 10 Agustus 2024<br>August 10, 2024 | Bogor | Bank Sinarmas |
| *Frontliner* | 12 Agustus 2024<br>August 12, 2024 | 19 September 2024<br>September 19, 2024 | Jakarta | Bank Sinarmas |
| Re-sertifikasi Manajemen Risiko Jenjang 5<br>Re-certification of Risk Management Level 5 | 12 Agustus 2024<br>August 12, 2024 | 13 Agustus 2024<br>August 13, 2024 | *Online Training* | Bank Sinarmas |
| Sertifikasi Manajemen Risiko Jenjang 4<br>Certification of Risk Management Level 4 | 12 Agustus 2024<br>August 12, 2024 | 13 Agustus 2024<br>August 13, 2024 | *Online Training* | Bank Sinarmas |
| Sosialisasi APU, PPT, & PPPSPM terkait Judi *online*<br>Socialization of APU PPT & PPPSPM related to Online Gambling | 13 Agustus 2024<br>August 13, 2024 | 13 Agustus 2024<br>August 13, 2024 | *Online Training* | Bank Sinarmas |
| Sertifikasi Manajemen Risiko Jenjang 4<br>Certification of Risk Management Level 4 | 14 Agustus 2024<br>August 14, 2024 | 15 Agustus 2024<br>August 15, 2024 | *Online Training* | Bank Sinarmas |
| Tote Bag Painting | 15 Agustus 2024<br>August 15, 2024 | 15 Agustus 2024<br>August 15, 2024 | Jakarta | Bank Sinarmas |
| *Podcast : Gold Winner Of The Hr Excellence Awards 2024 : Excellence In Work - Life Harmony* | 20 Agustus 2024<br>August 20, 2024 | 20 Agustus 2024<br>August 20, 2024 | *Online Training* | Bank Sinarmas |
| Re-sertifikasi Manajemen Risiko Jenjang 4<br>Re-certification of Risk Management Level 4 | 20 Agustus 2024<br>August 20, 2024 | 21 Agustus 2024<br>August 21, 2024 | *Online Training* | Bank Sinarmas |
| Sosialisasi APU, PPT, & PPPSPM terkait Judi *Online*<br>Socialization of APU PPT & PPPSPM related to Online Gambling | 23 Agustus 2024<br>August 23, 2024 | 23 Agustus 2024<br>August 23, 2024 | *Online Training* | Bank Sinarmas |
| Perlindungan Data Pribadi<br>Personal Data Protection | 6 September 2024<br>September 6, 2024 | 6 September 2024<br>September 6, 2024 | Jakarta | Bank Sinarmas |
| *Induction New Joiner* | 9 September 2024<br>September 9, 2024 | 30 September 2024<br>September 30, 2024 | *Online Training* | Bank Sinarmas |
| Sosialisasi APU, PPT, & PPPSPM terkait Judi *Online*<br>Socialization of APU PPT & PPPSPM related to Online Gambling | 11 September 2024<br>September 11, 2024 | 11 September 2024<br>September 11, 2024 | *Online Training* | Bank Sinarmas |
| *Podcast #25 : The Power of Customer Centricity* | 13 September 2024<br>September 13, 2024 | 13 September 2024<br>September 13, 2024 | *Online Training* | Bank Sinarmas |
| *Branch Supervisory Skills* | 16 September 2024<br>September 16, 2024 | 25 Oktober 2024<br>October 25, 2024 | *Online Training* | Bank Sinarmas |
| *Relationship Manager Development Program - Rmdp* | 17 September 2024<br>September 17, 2024 | 31 Desember 2024<br>December 31, 2024 | Jakarta | Bank Sinarmas |
| Sosialisasi APU PPT & PPPSPM terkait Judi *Online*<br>Socialization of APU PPT & PPPSPM related to Online Gambling | 2 Oktober 2024<br>October 2, 2024 | 2 Oktober 2024<br>October 2, 2024 | *Online Training* | Bank Sinarmas |

| Materi Pengembangan Kompetensi<br>Competency Development Materials | Tanggal Mulai<br>Start Date | Tanggal Selesai<br>End Date | Tempat Pelaksanaan<br>Venue | Penyelenggara<br>Organizer |
|---|---|---|---|---|
| Kode Etik Dan Kebijakan Pelindungan Nasabah<br>Code of Ethics and Customer Protection Policy | 7 Oktober 2024<br>October 7, 2024 | 27 Desember 2024<br>December 27, 2024 | *Online Training* | Bank Sinarmas |
| Pelindungan Data Pribadi<br>Personal Data Protection | 7 Oktober 2024<br>October 7, 2024 | 27 Desember 2024<br>December 27, 2024 | *Online Training* | Bank Sinarmas |
| Mekanisme Pelaksanaan Penilaian Agunan pada *Micro Loan* dan Restrukturisasi Kredit Mikro dengan Perpanjangan Jangka Waktu<br>Mechanism of Collateral Assessment Implementation on Micro Loan and Micro Loan Restructuring with Term Extension | 9 Oktober 2024<br>October 9, 2024 | 9 Oktober 2024<br>October 9, 2024 | *Online Training* | Bank Sinarmas |
| *Podcast #26 : The Fast & Futur-ious* | 11 Oktober 2024<br>October 11, 2024 | 11 Oktober 2024<br>October 11, 2024 | *Online Training* | Bank Sinarmas |
| Sosialisasi APU PPT & PPPSPM terkait Judi *Online*<br>Socialization of APU PPT & PPPSPM related to Online Gambling | 11 Oktober 2024<br>October 11, 2024 | 11 Oktober 2024<br>October 11, 2024 | *Online Training* | Bank Sinarmas |
| Pemaparan Hasil *Assessment* KCP Fatmawati 2024 dan *Refreshment* APU, PPT, & PPPSPM<br>Exposure of KCP Fatmawati 2024 Assessment Results and AML, PPT, & PPPSPM Refreshment | 1 November 2024<br>November 1, 2024 | 1 November 2024<br>November 1, 2024 | Jakarta | Bank Sinarmas |
| *Tawnhall* - Sosialisasi Produk SME *Loan* | 1 November 2024<br>November 1, 2024 | 1 November 2024<br>November 1, 2024 | *Online Training* | Bank Sinarmas |
| Kode Etik dan Pedoman Tingkah Laku<br>Code of Ethics and Code of Conduct | 4 November 2024<br>November 4, 2024 | 27 Desember 2024<br>December 27, 2024 | *E-Learning* | Bank Sinarmas |
| *Product Workshop* | 5 November 2024<br>November 5, 2024 | 6 November 2024<br>November 6, 2024 | Jakarta | Bank Sinarmas |
| SOP *Teller* Versi 6 | 7 November 2024<br>November 7, 2024 | 7 November 2024<br>November 7, 2024 | Magelang | Bank Sinarmas |
| *Townhall* – QRIS | 10 November 2024<br>November 10, 2024 | 10 November 2024<br>November 10, 2024 | *Online Training* | Bank Sinarmas |
| Re-sertifikasi Manajemen Risiko Jenjang 4<br>Re-certification of Risk Management Level 4 | 11 November 2024<br>November 11, 2024 | 12 November 2024<br>November 12, 2024 | *Online Training* | Bank Sinarmas |
| *Open Class*: Bedah Buku - Berlari di Tengah Hujan<br>Open Class: Book Review - Running in the Rain | 21 November 2024<br>November 21, 2024 | 21 November 2024<br>November 21, 2024 | Jakarta | Bank Sinarmas |
| *Lets Talk About Asset Class And How To Grow It* | 28 November 2024<br>November 28, 2024 | 28 November 2024<br>November 28, 2024 | Jakarta | Bank Sinarmas |
| Resolusi & *Recovery Plan* | 28 November 2024<br>November 28, 2024 | 29 November 2024<br>November 29, 2024 | Jakarta | Bank Sinarmas |
| *One Vision One Working* | 5 Desember 2024<br>December 5, 2024 | 6 Desember 2024<br>November 6, 2024 | Jakarta | Bank Sinarmas |
| Podcast #27 : Anti Tertipu Club : Yuk Laporkan Ke Indonesia *Anti-scam Centre*<br>Podcast #27 : Anti-Deception Club : Let's Report to the Indonesian Anti-scam Center | 10 Desember 2024<br>December 10, 2024 | 10 Desember 2024<br>December 10, 2024 | *Online Training* | Bank Sinarmas |
| ISO/IEC 27001:2022 | 11 Desember 2024<br>December 11, 2024 | 11 Desember 2024<br>December 11, 2024 | Jakarta | Bank Sinarmas |
| *Strategic Communication* | 13 Desember 2024<br>December 13, 2024 | 14 Desember 2024<br>December 14, 2024 | Bogor | Bank Sinarmas |
| APU, PPT, & PPPSPM | 16 Desember 2024<br>December 16, 2024 | 27 Desember 2024<br>December 27, 2024 | *E-Learning* | Bank Sinarmas |

## Pelatihan Eksternal Satuan Kerja Kepatuhan
**External Training for Compliance Work Unit**

| Materi Pengembangan Kompetensi<br>Competency Development Materials | Tanggal Mulai<br>Start Date | Tanggal Selesai<br>End Date | Tempat Pelaksanaan<br>Venue | Penyelenggara<br>Organizer |
|---|---|---|---|---|
| *Connecting the Dots* | 11 Januari 2024<br>January 11, 2024 | 11 Januari 2024<br>January 11, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |

| Materi Pengembangan Kompetensi<br>Competency Development Materials | Tanggal Mulai<br>Start Date | Tanggal Selesai<br>End Date | Tempat Pelaksanaan<br>Venue | Penyelenggara<br>Organizer |
|---|---|---|---|---|
| Pertemuan Koordinasi Tahunan PPATK Tahun 2024 Peran Pencegahan dan Pemberantasan TPPU-TPPT-PPPSPM Dalam Menyongsong Indonesia Emas 2045<br>Annual Coordination Meeting of PPATK in 2024 The Role of Prevention and Eradication of TPPU-TPPT-PPPSPM in Welcoming Indonesia Emas 2045 | 30 Januari 2024<br>January 30, 2024 | 30 Januari 2024<br>January 30, 2024 | Jakarta | Pusat Pelaporan dan Analisis Transaksi Keuangan - PPATK |
| Rakor Pemilu dan Optimalisasi Peran Masyarakat Dalam Mendukung Terwujudnya Indonesia Emas<br>Election Coordination Meeting and Optimization of Community Role in Supporting the Realization of Indonesia Emas | 30 Januari 2024<br>January 30, 2024 | 30 Januari 2024<br>January 30, 2024 | *Online Training* | Pusat Pelaporan dan Analisis Transaksi Keuangan - PPATK |
| Strategi Pengelolaan Investasi Industri Perasuransian dan Dana Pensiun<br>Insurance and Pension Fund Industry Investment Management Strategy | 1 Februari 2024<br>February 1, 2024 | 1 Februari 2024<br>February 1, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| Peran UU P2SK Dalam Memberikan Efek Jera Bagi Pelaku Jasa Keuangan Ilegal<br>The Role of the P2SK Law in Providing a Deterrent Effect for Illegal Financial Services Actors | 15 Februari 2024<br>February 15, 2024 | 15 Februari 2024<br>February 15, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| Program Mentoring Berbasis Risiko Tindak Pidana Pencucian Uang (TPPU) dan Tindak Pendanaan Terorisme (TPPT) yang Berasal dari Tindak Pidana Perdagangan Orang<br>Risk-Based Mentoring Program for Money Laundering (TPPU) and Terrorism Financing (TPPT) Originating from Human Trafficking | 15 Februari 2024<br>February 15, 2024 | 16 Februari 2024<br>February 16, 2024 | *Online Training* | Pusat Pelaporan dan Analisis Transaksi Keuangan - PPATK |
| Strategi Pengembangan SJK Melalui Penguatan Perbankan Syariah dan *Market Conduct*<br>SJK Development Strategy Through Strengthening Islamic Banking and Market Conduct | 15 Februari 2024<br>February 15, 2024 | 15 Februari 2024<br>February 15, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| Penyusunan Dokumen Penilaian Risiko TPPU, TPPT, dan/atau PPPSPM Secara Individual (*Individual Risk Assessment*/IRA)<br>Preparation of Individual Risk Assessment (IRA) Documents for TPPU, TPPT, and/or PPPSPM | 20 Februari 2024<br>February 20, 2024 | 20 Februari 2024<br>February 20, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| Bisnis Bank dan Multifinance Paska POJK Perlindungan Konsumen Nomor 22 Tahun 2023<br>Banking and Multifinance Businesses After POJK on Consumer Protection Number 22 of 2023 | 22 Februari 2024<br>February 22, 2024 | 22 Februari 2024<br>February 22, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| *Outlook* Ekonomi dan Keuangan di Tahun 2024<br>Economic and Financial Outlook in 2024 | 22 Februari 2024<br>February 22, 2024 | 22 Februari 2024<br>February 22, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| Menangkap Peluang di Tengah Perlambatan Ekonomi Global<br>Capturing Opportunities Amidst the Global Economic Slowdown | 23 Februari 2024<br>February 23, 2024 | 23 Februari 2024<br>February 23, 2024 | *Online Training* | Lembaga Pengembangan Perbankan Indonesia - LPPI |
| Sosialisasi Pelaksanaan *Bye Laws*<br>Socialization of the Implementation of Bye Laws | 23 Februari 2024<br>February 23, 2024 | 23 Februari 2024<br>February 23, 2024 | Jakarta | Forum Komunikasi Direktur Kepatuhan Perbankan - FKDKP |
| Strategi Mencegah Serangan Siber<br>Strategy to Prevent Cyber Attacks | 29 Februari 2024<br>February 29, 2024 | 29 Februari 2024<br>February 29, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| *Artificial Intelligence Changes the Face of the Financial Sector* | 7 Maret 2024<br>March 7, 2024 | 7 Maret 2024<br>March 7, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| Peluang dan Tantangan Aset Digital di Indonesia<br>Opportunities and Challenges of Digital Assets in Indonesia | 14 Maret 2024<br>March 14, 2024 | 14 Maret 2024<br>March 14, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| Strategi Mengakselerasi Pangsa Pasar Keuangan Syariah<br>Strategy to Accelerate Sharia Financial Market Share | 21 Maret 2024<br>March 21, 2024 | 21 Maret 2024<br>March 21, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| *Leadership Development Program MMDP 9*<br>MMDP 9 Leadership Development Program | 25 Maret 2024<br>March 25, 2024 | 13 Juni 2024<br>June 13, 2024 | Jakarta | Sinar Mas Multiartha - SMMA |
| Tantangan Pasar Modal dan Keuangan Syariah dalam Dinamika Sosial dan Suku Bunga<br>Challenges of Sharia Capital Markets and Finance in Social Dynamics and Interest Rates | 26 Maret 2024<br>March 26, 2024 | 26 Maret 2024<br>March 26, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |

| Materi Pengembangan Kompetensi<br>Competency Development Materials | Tanggal Mulai<br>Start Date | Tanggal Selesai<br>End Date | Tempat Pelaksanaan<br>Venue | Penyelenggara<br>Organizer |
|---|---|---|---|---|
| Peran Taksonomi untuk Keuangan Berlanjutan Indonesia (TKBI) dalam Mendorong Transisi Energi Menuju *Net Zero Emission* Indonesia<br>The Role of the Taxonomy for Sustainable Finance in Indonesia (TKBI) in Encouraging the Energy Transition Towards Net Zero Emission Indonesia | 28 Maret 2024<br>March 28, 2024 | 28 Maret 2024<br>March 28, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| *Presidential Lecture* | 17 April 2024<br>April 17, 2024 | 17 April 2024<br>April 17, 2024 | *Online Training* | Pusat Pelaporan dan Analisis Transaksi Keuangan - PPATK |
| Prospek Pengembangan SJK Melalui Open Finance dan NIM BOPO Perbankan<br>SJK Development Prospects Through Open Finance and Banking BOPO NIM | 23 April 2024<br>April 23, 2024 | 23 April 2024<br>April 23, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| *Global Sustainable Finance Landscape* | 25 April 2024<br>April 25, 2024 | 25 April 2024<br>April 25, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| Peluang dan Tantangan *Open Finance* di Indonesia<br>Opportunities and Challenges of Open Finance in Indonesia | 25 April 2024<br>April 25, 2024 | 25 April 2024<br>April 25, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| Sosialisasi dengan Pendapat Rancangan POJK Konglomerasi Keuangan & Perusahaan Induk Konglomerasi Keuangan<br>Socialization with Opinions on Draft POJK Financial Conglomerates & Holding Companies of Financial Conglomerates | 25 April 2024<br>April 25, 2024 | 25 April 2024<br>April 25, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| *Paylater*: Solusi Keuangan atau Sumber Masalah Baru?<br>Paylater: Financial Solution or New Source of Problems? | 26 April 2024<br>April 26, 2024 | 26 April 2024<br>April 26, 2024 | *Online Training* | Lembaga Pengembangan Perbankan Indonesia - LPPI |
| *Artificial Intelligence & Machine Learning For Digital Economy and Finance in Indonesia* | 29 April 2024<br>April 29, 2024 | 29 April 2024<br>April 29, 2024 | *Online Training* | Bank Indonesia |
| *Kick Off* & Seminar Bank Indonesia Hackaton 2024 | 29 April 2024<br>April 29, 2024 | 29 April 2024<br>April 29, 2024 | *Online Training* | Bank Indonesia |
| *How to Prevent Accounting Fraud in Financial Sector* | 2 Mei 2024<br>May 2, 2024 | 2 Mei 2024<br>May 2, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| Strategi Pemasaran Digital di Era Digital<br>Digital Marketing Strategy in the Digital Era | 5 Mei 2024<br>May 2, 2024 | 5 Mei 2024<br>May 2, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| Optimalisasi Sinergi dan Kolaborasi Mewujudkan Pilkada Serentak Tahun 2024 yang Mendukung Integrasi Bangsa<br>Optimizing Synergy and Collaboration to Realize Simultaneous Regional Elections in 2024 that Support National Integration | 7 Mei 2024<br>May 7, 2024 | 7 Mei 2024<br>May 7, 2024 | *Online Training* | Pusat Pelaporan dan Analisis Transaksi Keuangan - PPATK |
| *How to Prevent Greenwashing in Sustainable Finance* | 8 Mei 2024<br>May 8, 2024 | 8 Mei 2024<br>May 8, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| *Strengthening International Cooperation on Asset Recovery and Urgency of Detection of Illicit Financial Flows on Cyber-Enabled Fraud* | 17 Mei 2024<br>May 17, 2024 | 17 Mei 2024<br>May 17, 2024 | *Online Training* | Pusat Pelaporan dan Analisis Transaksi Keuangan - PPATK |
| Peluang Pertumbuhan Kredit Pasca Berakhirnya Kebijakan Restrukturisasi Kredit<br>Opportunities for Credit Growth After the End of the Credit Restructuring Policy | 22 Mei 2024<br>May 22, 2024 | 22 Mei 2024<br>May 22, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| *Capacity Development Perhitungan Emisi Gas Rumah Kaca Lingkup*<br>Capacity Development Calculation of Greenhouse Gas Emissions Scope | 28 Mei 2024<br>May 28, 2024 | 30 Mei 2024<br>May 30, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| Seminar Kesiapan Penyusunan *Individual Risk Assessment* (IRA) dan Penguatan Indikator Transaksi Keuangan Mencurigakan (TKM) bagi Penyedia Jasa Keuangan<br>Seminar on Readiness for Preparing Individual Risk Assessments (IRA) and Strengthening Suspicious Financial Transaction Indicators (TKM) for Financial Service Providers | 29 Mei 2024<br>May 29, 2024 | 29 Mei 2024<br>May 29, 2024 | Jakarta | Otoritas Jasa Keuangan - OJK |

| Materi Pengembangan Kompetensi<br>Competency Development Materials | Tanggal Mulai<br>Start Date | Tanggal Selesai<br>End Date | Tempat Pelaksanaan<br>Venue | Penyelenggara<br>Organizer |
|---|---|---|---|---|
| Peluang dan Tantangan Pelindungan Data Pribadi Dalam Transaksi Era Digital<br>Opportunities and Challenges for Protecting Personal Data in Digital Era Transactions | 30 Mei 2024<br>May 30, 2024 | 30 Mei 2024<br>May 30, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| *Capacity Building* Penguatan Pemahaman TPPU, TPPT & PPPSPM dan Kepatuhan Pelaporan Kepada Kupva Bb dan Penyedia Jasa Pembayaran<br>Capacity Building Strengthening Understanding of TPPU, TPPT & PPPSPM and Compliance in Reporting to Kupva Bb and Payment Service Providers | 4 Juni 2024<br>June 4, 2024 | 4 Juni 2024<br>June 4, 2024 | *Online Training* | Bank Indonesia |
| Rembuk Nasional APU PPT & PPPSPM 2024<br>National APU PPT & PPPSPM Conference 2024 | 6 Juni 2024<br>June 6, 2024 | 6 Juni 2024<br>June 6, 2024 | *Online Training* | Pusat Pelaporan dan Analisis Transaksi Keuangan - PPATK |
| *Building Trust For Insurance Industry Via Empathy in Claims Management* | 11 Juni 2024<br>June 11, 2024 | 11 Juni 2024<br>June 11, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| Gerak *Mobile* JKN (Gerakan Pemanfaatan Aplikasi *Mobile* JKN)<br>Mobile JKN Movement (Mobile JKN Application Utilization Movement) | 20 Juni 2024<br>June 20, 2024 | 20 Juni 2024<br>June 20, 2024 | *Online Training* | BPJS |
| BUNDAKU (Ibu, Anak, dan Keluarga Cakap Keuangan) Ibu Cerdas Keuangan, Mewujudkan Keluarga Sejahtera<br>BUNDAKU (Financially Savvy Mothers, Children, and Families) Financially Savvy Mothers, Realizing Prosperous Families | 25 Juni 2024<br>June 25, 2024 | 25 Juni 2024<br>June 25, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| Peran *Innovative Credit Scoring* (ICS) dalam Meningkatkan Akses Pendanaan<br>The Role of Innovative Credit Scoring (ICS) in Increasing Access to Funding | 27 Juni 2024<br>June 27, 2024 | 27 Juni 2024<br>June 27, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| Penanganan Kejahatan Siber Termasuk Perjudian Daring Sebagai Tindak Pidana Asal Tindak Pidana Pencucian Uang<br>Handling Cybercrime Including Online Gambling as a Predicate Crime of Money Laundering | 17 Juli 2024<br>July 17, 2024 | 17 Juli 2024<br>July 17, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| *Driving Corporate Performance Through Artificial Intelligence* | 25 Juli 2024<br>July 25, 2024 | 25 Juli 2024<br>July 25, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| *Workshop Business Continuity and Crisis Management in the Digital Era* | 5 Agustus 2024<br>August 5, 2024 | 6 Agustus 2024<br>August 6, 2024 | Jakarta | Otoritas Jasa Keuangan - OJK |
| Strategi Implementasi *Market Conduct* : Membangun Kepercayaan dan Meningkatkan Kinerja Industri Jasa Keuangan<br>Market Conduct Implementation Strategy: Building Trust and Improving the Performance of the Financial Services Industry | 8 Agustus 2024<br>August 8, 2024 | 8 Agustus 2024<br>August 8, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| Rapat Koordinasi Lanjutan Terkait Persiapan Pelaksanaan Kegiatan Gerakan Nasional Cerdas Keuangan Pada Momentum Hari Indonesia Menabung 2024<br>Follow-up Coordination Meeting Regarding Preparation for the Implementation of the National Financial Intelligence Movement Activities on the Momentum of Indonesia Savings Day 2024 | 14 Agustus 2024<br>August 14, 2024 | 14 Agustus 2024<br>August 14, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| Mengungkap Kejahatan Keuangan dan Tindak Pidana Pencucian Uang: Fokus Pada Judi *Online dan Game Virtual*<br>Exposing Financial Crime and Money Laundering: Focus on Online Gambling and Virtual Games | 15 Agustus 2024<br>August 15, 2024 | 15 Agustus 2024<br>August 15, 2024 | Jakarta | Genesis Inti Utama |
| *Launching* FIR ML & TF 2024 | 20 Agustus 2024<br>August 20, 2024 | 20 Agustus 2024<br>August 20, 2024 | *Online Training* | Pusat Pelaporan dan Analisis Transaksi Keuangan - PPATK |
| Fundamental Analisis Anti Pencucian Uang<br>Fundamentals of Anti Money Laundering Analysis | 27 Agustus 2024<br>August 27, 2024 | 27 Agustus 2024<br>August 27, 2024 | *Online Training* | Asosiasi Analis Transaksi Keuangan (AATKI) |
| *How to Prevent Money Laundering and Terrorism Financing* | 5 September 2024<br>September 5, 2024 | 5 September 2024<br>September 5, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |

| Materi Pengembangan Kompetensi<br>Competency Development Materials | Tanggal Mulai<br>Start Date | Tanggal Selesai<br>End Date | Tempat Pelaksanaan<br>Venue | Penyelenggara<br>Organizer |
|---|---|---|---|---|
| Undangan *Capacity Building* Forum Komunikasi Perkasan Perbankan Sumatera Barat (Formabar) tahun 2024<br>Invitation to Capacity Building of the West Sumatra Banking Cassation Communication Forum (Formabar) in 2024 | 5 September 2024<br>September 5, 2024 | 5 September 2024<br>September 5, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |
| Sosialisasi Komitmen dan Tindak Lanjut Nasional<br>Socialization of National Commitment and Follow-up | 6 September 2024<br>September 6, 2024 | 6 September 2024<br>September 6, 2024 | *Online Training* | Forum Komunikasi Direktur Kepatuhan Perbankan - FKDKP |
| *Training of Trainer* Skema KKNI Level 4 Instruktur<br>Training of Trainer Scheme KKNI Level 4 Instructor | 12 September 2024<br>September 12, 2024 | 14 Desember 2024<br>September 14, 2024 | *Online Training* | PROSMA CONSULTING INDONESIA |
| Sertifikasi Manajemen Risiko Jendang 7<br>Risk Management Certification Level 7 | 19 September 2024<br>September 19, 2024 | 19 September 2024<br>September 19, 2024 | *Online Training* | MAISA EDUKASI |
| *Project Management: the Basics for Success* | 1 Oktober 2024<br>October 1, 2024 | 31 Desember 2024<br>December 31, 2024 | *E-Learning* | MyLearning |
| Identifikasi Transaksi Keuangan Mencurigakan & Penentuan Indikasi Tindak Pidana Asal<br>Identification of Suspicious Financial Transactions & Determination of Indications of Predicate Crimes | 16 Oktober 2024<br>October 16, 2024 | 17 Oktober 2024<br>October 17, 2024 | *Online Training* | Forum Komunikasi Direktur Kepatuhan Perbankan - FKDKP |
| *EV Insurance, International Best Practices for Innovation of New Energy Products and Services* | 31 Oktober 2024<br>October 31, 2024 | 31 Oktober 2024<br>October 31, 2024 | Jakarta | Otoritas Jasa Keuangan - OJK |
| *Refreshment* Kepatuhan Jenjang 5<br>Compliance Refreshment Level 5 | 16 November 2024<br>November 16, 2024 | 16 November 2024<br>November 16, 2024 | *Online Training* | MAISA EDUKASI |
| *Strengthening the GRC Ecosystem in the financial Sector to Support the Golden Indonesia 2045 Vision* | 26 November 2024<br>November 26, 2024 | 26 November 2024<br>November 26, 2024 | *Online Training* | Otoritas Jasa Keuangan - OJK |



## Pelaksanaan Tugas dan Tanggung Jawab Tahun 2024

Organisasi Kepatuhan telah melakukan pengelolaan terhadap risiko kepatuhan Bank melalui program dan aktivitas kepatuhan di sepanjang tahun 2024 sebagai berikut.

1. Melakukan *review* dan analisis terhadap fungsi dan kinerja Satuan Kerja Kepatuhan guna penguatan fungsi kepatuhan dan struktur organisasi kepatuhan, antara lain melalui:
   a. Menyusun dan memantau rencana serta realisasi kerja Kepatuhan untuk periode tahun 2024.
   b. Mengembangkan sumber daya manusia Satuan Kerja Kepatuhan melalui program *capacity building*.
   c. Memastikan peranan Satuan Kerja Kepatuhan sebagai *Second Line of Defense* atau Lini Kedua Pertahanan Bank dalam fungsi kepatuhan berjalan dengan memadai.
2. Terhadap peraturan perundang-undangan baru maupun perubahan yang diterbitkan oleh Otoritas Jasa Keuangan (OJK), Bank Indonesia (BI) dan Peraturan Perundang-Undangan lainnya, yaitu:
   a. Melakukan pemantauan dan membuat kajian/analisa dampak serta menyusun tindak lanjut atas peraturan baru maupun perubahan dari peraturan OJK, BI dan Peraturan Perundang-Undangan lainnya.
   b. Sosialisasi atas peraturan regulator, kajian/analisa dampak, dan tindak lanjut disampaikan kepada Unit Kerja terkait melalui pertemuan langsung atau media komunikasi internal, maupun disampaikan kepada jajaran Direksi, Komisaris, Pejabat Eksekutif, Pimpinan Karyawan serta seluruh Karyawan melalui media komunikasi internal.

## Implementation of Duties and Responsibilities in 2024

The Compliance Organization has managed the Bank's compliance risks through compliance programs and activities throughout 2024 as follows.

1. Conducting a review and analysis of the functions and performance of the Compliance Work Unit in order to strengthen the compliance function and compliance organizational structure, including through:
   a. Preparing and monitoring the Compliance work plan and realization for the 2024 period.
   b. Developing the human resources of the Compliance Work Unit through a capacity building program.
   c. Ensuring that the role of the Compliance Work Unit as the Bank's Second Line of Defense in the compliance function is running adequately.
2. Regarding new laws and regulations or changes issued by the Financial Services Authority (OJK), Bank Indonesia (BI) and other Laws and Regulations, namely:
   a. Monitoring and conducting impact studies/analyses and preparing follow-up actions on new regulations or changes to OJK, BI and other Laws and Regulations.
   b. Dissemination of regulatory regulations, impact studies/analyses, and follow-up actions are submitted to the relevant Work Units through direct meetings or internal communication media, or submitted to the Board of Directors, Commissioners, Executive Officers, Employee Leaders and all Employees through internal communication media.

c. Penyusunan dampak dan tindak lanjut atas peraturan regulator yang dampaknya signifikan terhadap Bank dilakukan bersama dengan Unit Kerja terkait.

3. Terhadap ketentuan internal Bank, antara lain:
   a. Melakukan *review* kebijakan, ketentuan, sistem, dan prosedur, serta kegiatan usaha yang dilakukan Bank agar sesuai dengan peraturan OJK, BI, Otoritas terkait lainnya dan ketentuan peraturan Perundang-undangan.
   b. Meningkatkan kontrol risiko serta simplifikasi proses dan jumlan aturan.
   c. Melakukan pengkajian, *review* serta menjalankan fungsi *advisory* pada proses pengembangan ketentuan internal, sistem, transaksi, aktivitas serta produk dan layanan sebelum ditawarkan kepada nasabah dan/atau diimplementasikan untuk memastikan kepatuhan terhadap ketentuan regulator dan peraturan perundang-undangan yang berlaku.
   d. Memberikan opini/*advice* kepatuhan kepada unit-unit kerja pada pengembangan aktivitas, produk, Pengajuan fasilitas kredit baru atau pengajuan penambahan *plafond*/ limit fasilitas kredit untuk pihak terkait maupun pihak tidak terkait yang diajukan secara *single* debitur maupun *one obligor*, Pengajuan fasilitas baru perpanjangan atau perubahan fasilitas yang diajukan oleh Treasury & Financial Institution Group baik secara *single counterparty* maupun *one obligor* termasuk fasilitas untuk pihak terkait, penyusunan kebijakan dan prosedur internal Bank yang memiliki risiko kepatuhan.
4. Terhadap pengujian kepatuhan kepada Unit Kerja, antara lain:
   a. Melakukan pemeriksaan langsung ke Unit Kerja dan memberikan opini serta penjelasan terhadap praktik yang telah dilakukan oleh Unit Kerja harus sesuai dengan ketentuan regulator.
   b. Mengidentifikasi ketentuan-ketentuan regulator yang terkait dengan pelaksanaan pengujian pada Unit Kerja dan/atau aktifitas yang dipilih.
   c. Dalam pelaksanaan pengujian kepatuhan pada Unit Kerja yaitu memastikan agar kebijakan, ketentuan, sistem, dan prosedur serta kegiatan usaha yang dilakukan oleh Bank telah sesuai dengan peraturan OJK dan ketentuan peraturan perundang-undangan.
5. Meningkatkan kesadaran atas budaya kepatuhan melalui program kampanye kepatuhan yang dilakukan ke seluruh Unit Kerja dan jaringan Cabang Bank baik melalui media komunikasi internal maupun melalui pelatihan kelas dan *e-Learning*, antara lain:
   a. Kampanye kepatuhan melalui media komunikasi internal dalam bentuk *Compliance Info* (Co.in) dengan bentuk infografis yang bertujuan untuk memberikan refreshment peraturan perundang-undangan yang menarik dan mudah dipahami.
   b. Kampanye kepatuhan lainnya dilakukan oleh Unit Anti Penyuapan melalui media komunikasi internal yaitu dalam bentuk kampanye Anti Penyuapan yang diberikan kepada seluruh karyawan sebagai wujud pencegahan tindakan penyuapan maupun gratifikasi di dalam lingkungan Bank Sinarmas.

c. Preparation of the impact and follow-up actions on regulatory regulations that have a significant impact on the Bank is carried out together with the relevant Work Units.

3. Regarding the Bank's internal provisions, including:
   a. Reviewing policies, provisions, systems, and procedures, as well as business activities carried out by the Bank to comply with OJK, BI, other relevant Authorities and provisions of Laws and Regulations.
   b. Increasing risk control and simplifying processes and the number of rules.
   c. Conducting assessments, reviews and implementing advisory functions in the process of developing internal provisions, systems, transactions, activities and products and services before being offered to customers and/or implemented to ensure compliance with regulatory provisions and applicable laws and regulations.
   d. Providing compliance opinions/advice to work units in the development of activities, products, Submission of new credit facilities or submission of additional credit facility ceilings/limits for related parties or unrelated parties submitted as a single debtor or one obligor, Submission of new facilities, extensions or changes to facilities submitted by the Treasury & Financial Institution Group both as a single counterparty or one obligor including facilities for related parties, preparation of internal Bank policies and procedures that have compliance risks.
4. Regarding compliance testing of Work Units, including:
   a. Conducting direct inspections of Work Units and providing opinions and explanations regarding practices that have been carried out by Work Units must be in accordance with regulatory provisions.
   b. Identifying regulatory provisions related to the implementation of testing on Work Units and/or selected activities.
   c. In implementing compliance testing at the Work Unit, namely ensuring that the policies, provisions, systems, and procedures as well as business activities carried out by the Bank are in accordance with OJK regulations and provisions of laws and regulations.
5. Increasing awareness of the culture of compliance through a compliance campaign program carried out to all Work Units and the Bank's Branch network both through internal communication media and through classroom training and e-Learning, including:
   a. Compliance campaign through internal communication media in the form of Compliance Info (Co.in) with infographics that aim to provide interesting and easy-to-understand refreshment of laws and regulations.
   b. Other compliance campaigns are carried out by the Anti-Bribery Unit through internal communication media, namely in the form of an Anti-Bribery campaign given to all employees as a form of prevention of bribery and gratification within the Bank Sinarmas environment.

c. Melakukan pelatihan, sosialisasi dan *advisory meeting* terkait aktivitas kepatuhan termasuk sosialisasi ketentuan-ketentuan eksternal terkini ke seluruh jajaran organisasi Bank.

6. Memonitoring komitmen Bank kepada regulator atas temuan hasil pemeriksaan dan pemenuhan tindak lanjut komitmen yang harus dilakukan Bank dengan cara, antara lain:
   a. Melakukan pemantauan pemenuhan komitmen-komitmen Bank ke regulator dan penerapan kepatuhan pada umumnya di seluruh jajaran organisasi Bank.
   b. Melakukan koordinasi dengan Unit Kerja terkait untuk pemenuhan komitmen tindak lanjut audit regulator termasuk pelaksanaannya.
7. Melakukan *review* dan penyempurnaan terhadap penerapan tata kelola (GCG) Perusahaan yang baik antara lain:
   a. Menerapkan prinsip-prinsip keterbukaan, akuntabilitas, pertanggungjawaban, independensi, dan kewajaran agar terciptanya tata kelola yang baik di Bank Sinarmas.
   b. Menyampaikan laporan tata kelola bank maupun konglomerasi keuangan dan laporan kepatuhan terintegrasi telah disusun dan dilaporkan tepat waktu sesuai ketentuan regulator.
   c. Memperkuat diskusi, komunikasi dan sosialisasi sebagai salah satu bentuk pengawasan atas penerapan tata kelola dan Kepatuhan pada Konglomerasi Keuangan Sinarmas dimana Bank Sinarmas sebagai Entitas Utama yang menjalankan fungsi untuk mendorong peningkatan dan pendalaman kualitas tata kelola dan kepatuhan pada seluruh anggota Konglomerasi Keuangan Sinarmas.
8. Pengelolaan potensi risiko dan/atau risiko kepatuhan dengan baik yang diharapkan dapat meminimalisasi dampak risiko sedini mungkin dengan memberikan mitigasi risikonya, antara lain:
   a. Melakukan pemantauan terhadap rasio-rasio kepatuhan dan rasio prudential banking, antara lain:
      1) Batas Maksimum Pemberian Kredit (BMPK)
      2) *Leverage Ratio* (LR)
      3) *Liquidity Coverage Ratio* (LCR)
      4) *Net Stable Funding Ratio* (NSFR)
      5) *Capital Adequacy Ratio* (CAR)
      6) *Loan to Deposit Ratio* (LDR)
      7) *Non Performing Loan* (NPL)
      8) Giro Wajib Minimum (GWM)
      9) Posisi Devisa Netto (PDN)
   b. Pemenuhan sertifikasi kepatuhan bagi sumber daya manusia yang terdapat di Satuan Kerja Kepatuhan dimana sertifikasi kepatuhan dilakukan untuk memastikan, memelihara dan memberikan jaminan bahwa pemegang sertifikat menguasai bidang kepatuhan perbankan, begitu pula dengan pemenuhan sertifikasi manajemen risiko bagi sumber daya manusia di Satuan Kerja Kepatuhan dalam mengelola risiko kepatuhan agar terciptanya penerapan tata kelola yang baik.

c. Conducting training, socialization and advisory meetings related to compliance activities including socialization of the latest external provisions to all levels of the Bank's organization.

6. Monitoring the Bank's commitment to regulators regarding the findings of the examination results and fulfillment of follow-up commitments that must be carried out by the Bank by, among others:
   a. Monitoring the fulfillment of the Bank's commitments to regulators and the implementation of compliance in general across the Bank's organizational levels.
   b. Coordinating with related Work Units to fulfill the commitment to follow-up audits by regulators including their implementation.
7. Reviewing and improving the implementation of good corporate governance (GCG) including:
   a. Applying the principles of openness, accountability, responsibility, independence, and fairness in order to create good governance at Bank Sinarmas.
   b. Submitting reports on bank and financial conglomerate governance and integrated compliance reports that have been prepared and reported on time in accordance with regulatory provisions.
   c. Strengthening discussions, communication and socialization as a form of supervision over the implementation of governance and compliance at the Sinarmas Financial Conglomerate where Bank Sinarmas as the Main Entity carries out the function of encouraging the improvement and deepening of the quality of governance and compliance for all members of the Sinarmas Financial Conglomerate.
8. Good management of potential risks and/or compliance risks that are expected to minimize the impact of risks as early as possible by providing risk mitigation, including:
   a. Monitoring compliance ratios and prudential banking ratios, including:
      1) Maximum Credit Limit (BMPK)
      2) Leverage Ratio (LR)
      3) Liquidity Coverage Ratio (LCR)
      4) Net Stable Funding Ratio (NSFR)
      5) Capital Adequacy Ratio (CAR)
      6) Loan to Deposit Ratio (LDR)
      7) Non Performing Loan (NPL)
      8) Minimum Reserve Requirement (GWM)
      9) Net Foreign Exchange Position (PDN)
   b. Fulfillment of compliance certification for human resources in the Compliance Work Unit where compliance certification is carried out to ensure, maintain and provide assurance that certificate holders master the field of banking compliance, as well as the fulfillment of risk management certification for human resources in the Compliance Work Unit in managing compliance risks in order to create the implementation of good governance.

c. Melakukan pemantauan sanksi berupa denda yang diterima dari regulator dengan berupaya melakukan mitigasi risiko agar tidak terulang kembali.

9. Melakukan rangkaian aktivitas terkait implementasi penerapan program Anti Pencucian Uang, Pencegahan Pendanaan Terorisme dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal, antara lain:
   a. Implementasi System RRS (*Regulatory Reporting*) APOLO OJK & PEDAL KPK, *Override System handling* cabang, *system screening* pembukaan rekening Simobi Plus, sinkronisasi *system risk rating OneFCC, project system data masking report PPATK, System goAML 5.4, system election report* (Pilkada), *system monitoring internal* dan monitoring transaksi *loan*, dan *DRP (Disaster Recovery Plan) system* Tahun 2024.
   b. Melakukan pemantauan terhadap ketentuan Regulator dan peraturan perundang-undangan terkait penerapan program APU, PPT, dan PPPSPM yang berlaku serta melakukan analisa dampak terhadap regulasi terkini terkait penerapan program APU, PPT, dan PPPSPM.
   c. Menyusun, melakukan pengkinian, dan mengusulkan kebijakan dan prosedur serta ketentuan internal terkait penerapan program APU, PPT, dan PPPSPM.
   d. Melakukan pemantauan dan pengujian terhadap penerapan peraturan perundangan-undangan terkait penerapan APU, PPT, dan PPPSPM yang berdampak pada Bank pada unit-unit kerja Bank dan Cabang.
   e. Secara kontinyu melakukan sosialisasi/pelatihan (ketentuan baru maupun *refreshment*) berkaitan dengan penerapan program APU, PPT, dan PPPSPM, baik melalui media tatap muka secara langsung maupun online, guna meningkatkan pemahaman seluruh karyawan Bank dalam penerapan program APU, PPT, dan PPPSPM.
   f. Kampanye terkait penerapan program APU, PPT, dan PPPSPM melalui media komunikasi internal dalam bentuk *Compliance Info* (Co.in) dengan bentuk infografis yang bertujuan untuk memberikan *refreshment* ketentuan yang menarik dan mudah dipahami.
   g. Melakukan *review* kepatuhan atas ketentuan internal, proses, transaksi, aktivitas, operasional, sistem, aktivitas serta produk dan layanan Bank, guna memastikan kepatuhan terhadap ketentuan penerapan program APU, PPT, dan PPPSPM yang berlaku.
   h. Menganalisis secara berkala penilaian risiko Tindak Pidana Pencucian Uang, Tindak Pidana Pendanaan Terorisme dan Pendanaan Proliferasi Senjata Pemusnah Massal terkait dengan Nasabah, negara atau area geografis, produk, jasa, transaksi atau jaringan distribusi (*delivery channels*).
   i. Supervisi, koordinasi, pemantauan serta evaluasi Kepatuhan APU, PPT, dan PPPSPM Bank.

c. Monitoring sanctions in the form of fines received from regulators by trying to mitigate risks so that they do not happen again.

9. Carrying out a series of activities related to the implementation of the Anti-Money Laundering, Prevention of Terrorism Funding and Prevention of Proliferation of Weapons of Mass Destruction Funding programs, including:
   a. Implementation of the RRS (Regulatory Reporting) System APOLO OJK & PEDAL KPK, Override System handling branches, , Simobi Plus account opening screening system, OneFCC risk rating system synchronization, PPATK data masking report project system, goAML 5.4 System, election report system (Pilkada), internal monitoring system and loan transaction monitoring, and DRP (Disaster Recovery Plan) system in 2024.
   b. Monitoring the provisions of the Regulator and laws and regulations related to the implementation of the APU, PPT, and PPPSPM programs that apply and analyzing the impact of the latest regulations related to the implementation of the APU, PPT, and PPPSPM programs.
   c. Preparing, updating, and proposing policies and procedures as well as internal provisions related to the implementation of the APU, PPT, and PPPSPM programs.
   d. Monitoring and testing the implementation of laws and regulations related to the implementation of APU, PPT, and PPPSPM that have an impact on the Bank in the Bank's work units and Branches.
   e. Continuously conducting socialization/training (new provisions and refreshments) related to the implementation of the APU, PPT, and PPPSPM programs, both through direct face-to-face media and online, in order to improve the understanding of all Bank employees in the implementation of the APU, PPT, and PPPSPM programs.
   f. Campaigning related to the implementation of the APU, PPT, and PPPSPM programs through internal communication media in the form of Compliance Info (Co.in) with infographics that aim to provide refreshments on interesting and easy-to-understand provisions.
   g. Conduct compliance reviews on internal provisions, processes, transactions, activities, operations, systems, activities, and products and services of the Bank, to ensure compliance with the provisions of the implementation of the applicable AML, PPT, and PPPSPM programs.
   h. Periodically analyze the risk assessment of Money Laundering, Terrorism Financing and Proliferation of Weapons of Mass Destruction related to Customers, countries or geographic areas, products, services, transactions or distribution networks (delivery channels).
   i. Supervise, coordinate, monitor and evaluate the Bank's AML, PPT, and PPPSPM Compliance.

j. Memastikan pemeliharaan dan pengkinikan Daftar Terduga Teroris dan Organisasi Teroris (DTTOT), Daftar Pendanaan Proliferasi Senjata Pemusnah Massal (DPPSPM), serta daftar pantau (*watchlist*) lainnya untuk kepentingan program APU, PPT, dan PPPSPM serta memastikan identifikasi dan pemeriksaan daftar-daftar dimaksud terhadap *database* Nasabah Bank, baik sebelum proses pembukaan hubungan usaha, secara adhoc maupun secara berkala.
k. Memantau dan melakukan analisa terhadap transaksi abnormal Nasabah.
l. Melaporkan Transaksi Keuangan Mencurigakan (LTKM), Transaksi Keuangan Tunai (LTKT), Transaksi Keuangan Transfer Dana Dari dan ke Luar Negeri (LTKL) serta Laporan Nasabah baru melalui Sistem Informasi Pengguna Jasa Terpadu (SIPESAT), Sistem Informasi Terduga Pendanaan Terorisme (SIPENDAR) ke PPATK, Sistem Informasi Program Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme (SIGAP), Laporan *Individual Risk Assessment* (IRA) ke OJK.
m. Secara kontinyu melakukan monitoring pengkinian data Nasabah, dimana rencana dan realisasi pengkinian data Nasabah tersebut dilaporkan secara tahunan ke OJK.
n. Menyusun dan menyampaikan laporan APU, PPT, dan PPPSPM melalui sistem bantu APOLO kepada OJK secara semesteran serta menindaklanjuti hasil screening Nasabah terhadap DTTOT dan DPPSPM melalui sistem bantu SIGAP kepada OJK.
o. Menindaklanjuti, menyediakan data/informasi, dan memastikan kelengkapan akurasinya terhadap permintaan terkait APU, PPT, dan PPPSPM dari Regulator dan Aparat Penegak Hukum (Apgakum).
p. Melaksanakan pengawasan atas kuantitas Laporan Transaksi Keuangan Tunai (LTKT), Laporan Transaksi Keuangan Transfer Dana dari dan ke Luar Negeri (LTKL) dan Laporan Transaksi Keuangan Mencurigakan (LTKM) dan pengawasan atas kualitas Laporan Transaksi Keuangan Mencurigakan (LTKM) & Pemantauan Alert.

## Peta Jalan Fungsi Kepatuhan

Organisasi kepatuhan memiliki visi, misi, dan objektif menjaga keseimbangan antara aspek kepatuhan, komersial, dan inovasi guna mendorong pertumbuhan bisnis Bank yang sehat dan berkelanjutan. Bank melakukan penguatan organisasi kepatuhan secara berkesinambungan melalui peta jalan fungsi kepatuhan.

Bank berkomitmen untuk memenuhi ketentuan dan standar praktik perbankan yang sehat dengan menerapkan strategi manajemen risiko kepatuhan. Setiap pimpinan di seluruh unit kerja Bank bertanggung jawab langsung terhadap pelaksanaan kepatuhan di unitnya masing-masing, termasuk memastikan langkah-langkah koreksi atas ketidakpatuhan dan pengawasan terhadap pelaksanaan tindakan korektif tersebut.

j. Ensure the maintenance and updating of the List of Suspected Terrorists and Terrorist Organizations (DTTOT), List of Proliferation of Weapons of Mass Destruction Funding (DPPSPM), and other watchlists for the benefit of the AML, PPT, and PPPSPM programs and ensure the identification and examination of the lists in question against the Bank's Customer database, both before the process of opening a business relationship, on an ad hoc basis and periodically.
k. Monitor and analyze abnormal Customer transactions.
l. Report Suspicious Financial Transactions (LTKM), Cash Financial Transactions (LTKT), Financial Transactions of Fund Transfers From and to Overseas (LTKL) and new Customer Reports through the Integrated Service User Information System (SIPESAT), Suspected Terrorism Funding Information System (SIPENDAR) to PPATK, Anti-Money Laundering and Terrorism Funding Prevention Program Information System (SIGAP), Individual Risk Assessment (IRA) Reports to OJK.
m. Continuously monitor the updating of Customer data, where the plan and realization of updating Customer data are reported annually to OJK.
n. Prepare and submit APU, PPT, and PPPSPM reports through the APOLO support system to OJK on a semi-annual basis and follow up on the results of Customer screening of DTTOT and DPPSPM through the SIGAP support system to OJK.
o. Following up, providing data/information, and ensuring the completeness and accuracy of requests related to APU, PPT, and PPPSPM from Regulators and
p. Carry out supervision of the quantity of Cash Financial Transaction Reports (LTKT), Reports on Financial Transactions of Fund Transfers from and to Overseas (LTKL) and Suspicious Financial Transaction Reports (LTKM) and supervision of the quality of Suspicious Financial Transaction Reports (LTKM) & Alert Monitoring.

## Compliance Function Roadmap

The compliance organization has a vision, mission, and objective to maintain a balance between compliance, commercial, and innovation aspects in order to drive healthy and sustainable business growth of the Bank. The Bank continuously strengthens the compliance organization through the compliance function roadmap.

The Bank is committed to meeting the provisions and standards of healthy banking practices by implementing a compliance risk management strategy. Each leader in all Bank work units is directly responsible for the implementation of compliance in their respective units, including ensuring corrective measures for non-compliance and supervision of the implementation of these corrective actions.

## Rencana Strategis 2025

Rencana strategis yang telah ditetapkan Satuan Kerja Kepatuhan untuk direalisasikan di tahun 2025, yakni:

a. Memperkuat organisasi kepatuhan dengan mengembangkan Sumber Daya Manusia (SDM) unit kepatuhan melalui program-program *Capacity Building* guna mengakselerasi kompetensi SDM SKK dalam menjalankan fungsi *advisory* dan pengawasan yang efektif dan berkualitas dalam mendorong budaya kepatuhan, inovasi dan bisnis. Sejalan dengan pengembangan produk dan layanan Bank menjadi digital, program-program *Capacity Building* diarahkan untuk mengembangkan SDM SKK untuk memahami teknologi digital serta regulasi terkait digital dan teknologi.
b. Compliance Group secara berkelanjutan terus meningkatkan *awareness* dan budaya kepatuhan melalui program *Compliance Campaign* yang lebih intensif ke seluruh unit kerja dan jaringan cabang Bank sebagaimana yang telah dilakukan saat ini melalui *media video conference, e-learning, Compliance Info* (CoIn).
c. Melalui unit Anti Penyuapan yang berada di bawah supervisi *Compliance Group*, berkelanjutan melakukan sosialisasi melalui media komunikasi internal sebagaimana penjelasan di atas, dengan tujuan untuk meningkatkan kepedulian atas tindakan Anti Penyuapan.
d. Meningkatkan peran dan fungsi *Compliance* dalam pelaksanaan assessment atas ketentuan, kebijakan, sistem maupun prosedur, pengajuan penyelenggaraan produk yang akan dijalankan oleh Bank serta kesesuaiannya dengan ketentuan regulator yang berlaku.
e. Pelaksanaan *Regulation update* atas regulasi baru atau perubahan serta membuat gap dan impact analysis atas ketentuan tersebut dan menyampaikan hasil kajian kepada unit kerja terkait.
f. Melaksanakan pengujian kepatuhan (*Compliance Testing*) kepada cabang, *business unit* maupun *supporting unit* berdasarkan analisis risiko kepatuhan, untuk memastikan pemenuhan kepatuhan atas ketentuan regulator yang berlaku pada aktivitas di cabang, *business unit* maupun *supporting unit* serta mengidentifikasi dan mengeskalasi isu-isu terkait dengan kepatuhan Bank yang memerlukan penetapan langkah strategis dan cepat untuk mengatasi kelemahan masalah kepatuhan kepada manajemen.
g. Melakukan *review* dan pengkinian terhadap kebijakan dan prosedur penerapan program APU, PPT, dan PPPSPM guna menyelaraskan dengan ketentuan dan peraturan APU, PPT, dan PPPSPM yang berlaku. Serta secara berkelanjutan melakukan penyesuaian terhadap modus/tipologi TPPU, TPPT, dan/atau PPSPM terkini.
h. Sebagai pemenuhan 5 (lima) pilar APU, PPT & PPPSPM dimana salah satu fokus adalah pengembangan *system* APU, PPT, dan PPPSPM secara berkesinambungan. Terkait hal ini, *Compliance Group* secara berkelanjutan melakukan pengembangan *system* meliputi implementasi sistem baru yang belum ada sebelumnya di *production environment* dan *enhancement* serta

## 2025 Strategic Plan

The strategic plan that has been set by the Compliance Work Unit to be realized in 2025, namely:

a. Strengthening the compliance organization by developing Human Resources (HR) of the compliance unit through Capacity Building programs to accelerate the competence of SKK HR in carrying out effective and quality advisory and supervisory functions in driving a culture of compliance, innovation and business. In line with the development of the Bank's products and services to become digital, Capacity Building programs are directed at developing SKK HR to understand digital technology and regulations related to digital and technology.
b. The Compliance Group continuously increases awareness and compliance culture through a more intensive Compliance Campaign program to all work units and branch networks of the Bank as has been done currently through video conference media, e-learning, Compliance Info (CoIn).
c. Through the Anti-Bribery unit under the supervision of the Compliance Group, continuously conducts socialization through internal communication media as explained above, with the aim of increasing awareness of Anti-Bribery actions.
d. Increasing the role and function of Compliance in implementing assessments of provisions, policies, systems and procedures, submission of product implementation to be run by the Bank and its compliance with applicable regulatory provisions.
e. Implementation of Regulation updates on new regulations or changes and making gap and impact analysis on these provisions and submitting the results of the study to the relevant work units.
f. Conducting compliance testing to branches, business units and supporting units based on compliance risk analysis, to ensure compliance with regulatory provisions applicable to activities at branches, business units and supporting units and identifying and escalating issues related to Bank compliance that require strategic and rapid steps to address weaknesses in compliance issues to management.
g. Conducting reviews and updates on policies and procedures for implementing APU, PPT, and PPPSPM programs in order to align with applicable APU, PPT, and PPPSPM provisions and regulations. And continuously making adjustments to the latest TPPU, TPPT, and/or PPSPM modes/typologies.
h. As a fulfillment of the 5 (five) pillars of APU, PPT & PPPSPM where one focus is the continuous development of APU, PPT, and PPPSPM systems. In this regard, the Compliance Group continuously carries out system development including the implementation of new systems that have not previously existed in the production environment

evaluasi *performance* BaU (*Business as Usual*) guna meningkatkan efektivitas dan efisiensi program APU, PPT, dan PPPSPM sejalan dengan kebutuhan dari Regulator.

i. Penguatan pelaksanaan *Quality Control* (QC) pengawasan terhadap kuantitas dan *Quality Assurance* (QA) pengawasan terhadap kualitas pelaporan APU, PPT, dan PPPSPM.

j. Di samping itu sejalan dengan tren perbankan dan ekonomi digital, Bank telah memanfaatkan teknologi dalam membantu pemenuhan aturan *Know Your Customer* melalui pengembangan sistem antara lain penggunaan *face recognition*.

k. *Monitoring* dan memastikan penerapan GCG Bank dan Konglomerasi Keuangan Sinar Mas telah berjalan sesuai dengan ketentuan yang berlaku.

and enhancement and evaluation of BaU (Business as Usual) performance to improve the effectiveness and efficiency of APU, PPT, and PPPSPM programs in line with the needs of the Regulator.

i. Strengthening the implementation of Quality Control (QC) supervision of quantity and Quality Assurance (QA) supervision of the quality of APU, PPT, and PPPSPM reporting.

j. In addition, in line with the trend of banking and digital economy, the Bank has utilized technology to help fulfill the Know Your Customer regulation through system development including the use of face recognition.

k. Monitoring and ensuring the implementation of GCG Bank and Sinar Mas Financial Conglomerate has been running in accordance with applicable provisions.



# *LEGAL GROUP*
## Legal Group

Seiring dengan meningkatnya kompleksitas bisnis, Bank Sinarmas menugaskan *Legal Group* untuk mengidentifikasi serta mengurangi risiko hukum yang mungkin timbul dari kegiatan usaha Bank. *Legal Group* berada di bawah Direktorat *Compliance & Risk Management*, bersama dengan beberapa unit kerja lainnya.

Fungsi yang dijalankan *Legal Group* sangat penting, antara lain:

1. Tindakan Pencegahan (*Preventive*)
   a. Legal *Review*
      Identifikasi risiko hukum dalam rangka tindakan dan keputusan yang diambil oleh Bank, baik dalam rangka pemberian fasilitas kredit, maupun kerja sama dengan pihak lain;
   b. Legal *Advice*
      Diskusi interaktif dengan seluruh unit kerja Bank dalam rangka pemberian opini hukum dan bantuan hukum secara langsung terhadap peristiwa hukum dan/atau permasalahan hukum yang sedang dihadapi oleh Bank;
   c. Legal *Awareness*
      Dalam rangka meningkatkan legal *awareness* di seluruh Cabang Bank Sinarmas, *Legal Group* melakukan *action plan* tahunan bersama-sama dengan Unit Kerja Pengenalan Nasabah (UKPN),

Along with the increasing complexity of the business, Bank Sinarmas has assigned the Legal Group to identify and reduce legal risks that may arise from the Bank's business activities. The Legal Group is under the Compliance & Risk Management Directorate, together with several other work units.

The functions carried out by the Legal Group are very important, including:

1. Preventive Action
   a. Legal Review
      Identification of legal risks in the context of actions and decisions taken by the Bank, both in the context of providing credit facilities, and cooperation with other parties;
   b. Legal Advice
      Interactive discussions with all Bank work units in order to provide legal opinions and direct legal assistance for legal events and/or legal problems currently being faced by the Bank;
   c. Legal Awareness
      In order to increase legal awareness in all Bank Sinarmas Branches, the Legal Group carries out an annual action plan together with the Customer Recognition Work Unit (UKPN), Service Quality and

Service Quality dan *Anti-Fraud* melalui pemberian materi pengantar hukum dasar dan pembahasan *legal cases* yang dihadapi oleh setiap cabang. Pembekalan pengetahuan hukum dasar ini diberikan kepada pejabat-pejabat operasional (*Regional Operation Manager, Head of Operation, Supervisor, Branch Internal Control, Teller,* dan *Customer Service*). Pejabat-pejabat tersebut diharapkan dapat memiliki kompetensi dan pemahaman hukum dasar yang cukup kuat untuk dapat memitigasi ataupun meminimalisir timbulnya permasalahan hukum;

d. *Legal Knowledge*
*Legal Group* bekerja sama dengan *Learning Center* untuk memberikan materi pembekalan mengenai hukum dan permasalahannya kepada peserta *Management Development Program* (MDP) dan *Corporate Banking Development Program* (CBDP). *Legal Group* juga memberikan materi pada *training refreshment* yang dilakukan bersama dengan unit kerja lainnya. Selain itu, *Legal Group* juga bekerja sama dengan *Corporate Secretary* untuk memberikan materi mengenai hukum yang akan ditampilkan pada Lensa Berita yang dapat diakses oleh seluruh karyawan Bank Sinarmas;

e. *Legal Drafting*
Melakukan *drafting* atas Perjanjian dan/atau dokumen-dokumen antara lain namun tidak terbatas pada Perjanjian Kerja Sama, Perjanjian Kredit, Perjanjian Jaminan, Perjanjian Sewa Menyewa dan/atau Surat Kuasa Direksi;

f. *Legal Resume*
Suatu dokumen tertulis yang merupakan pemeriksaan atas data-data legalitas calon/atau debitur yang meliputi subyek hukum, perizinan, dan jaminan sebelum dilakukan pengikatan kredit dan/atau pengikatan jaminan;

2. Menangani Permasalahan Hukum
*Legal Group* mewakili perusahaan berdasarkan Surat Kuasa untuk melakukan perbuatan hukum di luar pengadilan, seperti pendampingan untuk perkara perdata maupun pidana serta memberikan laporan kepada pimpinan perusahaan untuk setiap perkembangan perkara yang sedang ditanganinya;
3. Melakukan *Review* Kinerja Untuk Pihak Ketiga
*Legal Group* melakukan *review* secara berkala terhadap kinerja pihak ketiga dalam penyelesaian dokumen kredit dan dokumen terkait lainnya;
4. Membina Hubungan Baik
*Legal Group* senantiasa mengedepankan hukum dan menjalin hubungan baik dengan instansi dan regulator dalam rangka penegakan hukum atas penanganan permasalahan hukum yang dihadapi oleh Bank Sinarmas; dan
5. Penguatan kompetensi personel *Legal Group* Bank Sinarmas dipilih berdasarkan latar belakang pendidikan hukum (minimal S1 Hukum). Upaya penguatan dan peningkatan profesi legal terus dilakukan oleh Perseroan, dengan melakukan *workshop* atau *training* secara

Anti-Fraud by providing introductory basic legal materials and discussing legal cases faced by each branch. This basic legal knowledge provision is provided to operational officials (Regional Operation Manager, Head of Operation, Supervisor, Branch Internal Control, Teller, and Customer Service).
These officials are expected to have sufficient basic legal competence and understanding to be able to mitigate or minimize the emergence of legal problems;

d. Legal Knowledge
The Legal Group collaborates with the Learning Center to provide provision materials on law and its problems to participants of the Management Development Program (MDP) and Corporate Banking Development Program (CBDP). The Legal Group also provides materials on refreshment training conducted together with other work units. In addition, the Legal Group also collaborates with the Corporate Secretary to provide materials on law that will be displayed on the News Lens, which can be accessed by all Bank Sinarmas employees;

e. Legal Drafting
Drafting Agreements and/or documents including but not limited to Cooperation Agreements, Credit Agreements, Guarantee Agreements, Lease Agreements and/or Directors' Power of Attorney;

f. Legal Resume
A written document that is an examination of the legal data of prospective/or debtors including legal subjects, permits, and collateral before a credit agreement and/or collateral agreement is made;

2. Handling Legal Issues
The Legal Group represents the company based on a Power of Attorney to carry out legal acts outside the court, such as assistance for civil and criminal cases and providing reports to the company's management for every development of the case being handled;
3. Conducting Performance Reviews for Third Parties
The Legal Group conducts periodic reviews of the performance of third parties in completing credit documents and other related documents;
4. Building Good Relations
The Legal Group always prioritizes the law and establishes good relations with agencies and regulators in the context of law enforcement for handling legal problems faced by Bank Sinarmas; and
5. Strengthening the competence of Bank Sinarmas Legal Group personnel selected based on a legal educational background (minimum S1 Law). Efforts to strengthen and improve the legal profession continue to be carried out by the Company, by conducting workshops or training

berkala. Salah satu bentuk penguatan kompetensi adalah melakukan rapat kerja setiap tahun dengan seluruh legal kantor wilayah dan mengundang Unit Kerja *Corporate Secretary*, Unit Kerja *Loan Recovery Group* dan Unit Kerja terkait lainnya. Dalam rapat kerja tersebut turut diundang Pengacara dan Notaris untuk memberikan pandangan hukum serta diskusi untuk menambah pengetahuan mengenai dinamika hukum yang terjadi.

periodically. One form of competency strengthening is to hold an annual work meeting with all legal regional offices and invite the Corporate Secretary Work Unit, Loan Recovery Group Work Unit and other related Work Units. In the work meeting, Lawyers and Notaries were also invited to provide legal views and discussions to increase knowledge about the legal dynamics that occur.



# PERKARA PENTING YANG DIHADAPI
## Legal Cases

Perkara hukum yang dihadapi Bank di sepanjang tahun 2024, yakni:

Legal cases faced by the Bank throughout 2024, namely:

| Permasalahan Hukum<br>Legal Issues | Perdata (Bank sebagai Tergugat)<br>Civil Law (Bank as Defendant) | | | | Status Penyelesaian<br>Resolution Status |
|---|---|---|---|---|---|
| Unit Usaha<br>Business Unit | Konvensional<br>Conventional | | Unit Usaha Syariah<br>Sharia Business Unit | | |
| Tahun<br>Year | 2024 | 2023 | 2024 | 2023 | |
| Perkara yang telah Selesai (Mempunyai Kekuatan Hukum Tetap)<br>Cases That Have Been Resolved (Legally Binding/Final and Binding Verdicts) | 1 | 10 | 0 | 1 | 1 |
| Perkara dalam Proses Penyelesaian (posisi Desember 2024)<br>Cases in the Process of Resolution (as of December 2024) | 11 | 2 | 0 | 1 | 11 |

Permasalahan hukum yang dihadapi Bank tidak memberikan pengaruh signifikan terhadap kondisi Bank.

Legal issues faced by the Bank do not have a significant impact on the Bank's condition.

### Perkara Penting yang Dihadapi Direksi dan Dewan Komisaris

Dewan Komisaris maupun anggota Direksi Bank Sinarmas tidak menghadapi perkara hukum baik perdata maupun pidana sepanjang tahun 2024.

### Legal Cases Faced by the Board of Directors and Board of Commissioners

The Board of Commissioners and members of the Board of Directors of Bank Sinarmas did not face any civil or criminal legal cases throughout 2024.

| Permasalahan Hukum<br>Legal Issues | Perdata<br>Civil | Pidana<br>Criminal | Status Penyelesaian<br>Resolution Status |
|---|---|---|---|
| Perkara yang telah Selesai (Mempunyai Kekuatan Hukum Tetap)<br>Cases That Have Been Resolved (Legally Binding/Final and Binding Verdicts) | NIHIL<br>NIL | NIHIL<br>NIL | NIHIL<br>NIL |
| Perkara dalam Proses Penyelesaian (posisi Desember 2024)<br>Cases in the Process of Resolution (as of December 2024) | NIHIL<br>NIL | NIHIL<br>NIL | NIHIL<br>NIL |

### Dampak Bagi Bank

Perkara hukum yang dihadapi tidak berdampak terhadap kegiatan usaha Bank.

### Impact on the Bank

The legal proceedings have no effect on the Bank's operational activities.

### Sanksi Administratif

Selama tahun 2024, tidak terdapat sanksi administratif yang material kepada Bank, anggota Dewan Komisaris dan anggota Direksi oleh Otoritas Jasa Keuangan dan otoritas lainnya, yang memengaruhi kelangsungan usaha Bank maupun sanksi yang berdampak kepada Manajemen Bank.

### Administrative Sanctions

Throughout 2024, the Bank, members of the Board of Commissioners, and members of the Board of Directors did not receive any material administrative sanctions from the Financial Services Authority or other regulatory bodies that affected the Bank's business continuity or had an impact on its management.

# KETERBUKAAN INFORMASI
## Information Disclosure



Bank Sinarmas menyampaikan keterbukaan informasi sesuai ketentuan peraturan perundang-undangan sebagai wujud kepatuhan terhadap penerapan prinsip GCG. Sepanjang tahun 2024, Bank telah memenuhi kewajiban terkait keterbukaan informasi melalui berbagai saluran, termasuk media massa, sistem pelaporan elektronik ke Otoritas Jasa Keuangan, Bursa Efek Indonesia, situs web Bank, serta penyampaian laporan secara berkala maupun insidental kepada regulator.

Bank Sinarmas discloses information in accordance with applicable laws and regulations as part of its commitment to implementing the principles of Good Corporate Governance (GCG). Throughout 2024, the Bank fulfilled its disclosure obligations through various channels, including mass media, electronic reporting systems to the Financial Services Authority, the Indonesia Stock Exchange, the Bank's official website, as well as through the submission of both periodic and incidental reports to regulators.

### Rincian Pelaksanaan Keterbukaan Informasi

### Details of the Implementation of Information Disclosure

| Perihal<br>Regarding | Keterangan<br>Description | Jumlah<br>Total |
|---|---|---|
| Keterbukaan Informasi atas Laporan Informasi atau Fakta Material<br>Disclosure of Information on Material Information or Fact Reports | Insidental<br>Incidental | 1 |
| Laporan Bulanan Registrasi Pemegang Efek<br>Monthly Report of Securities Holder Registration | Rutin<br>Routine | 12 |
| Laporan Data Hutang Valuta Asing<br>Foreign Currency Debt Data Report | Rutin<br>Routine | 12 |
| Laporan Tahunan<br>Annual Report | Rutin<br>Routine | 1 |
| Laporan Keuangan Tahunan<br>Annual Financial Report | Rutin<br>Routine | 1 |

# AKSES INFORMASI DAN DATA PERUSAHAAN
## Company Information And Data Access

Bank Sinarmas menyediakan akses informasi bagi seluruh pemangku kepentingan, melalui:

Bank Sinarmas provides information access for all stakeholders, through:

| | |
|---|---|
| Situs Web<br>Website | www.banksinarmas.com |
| Call Center | 1500153; (021) 501 88888 |
| Customer Care | care@banksinarmas.com |
| E-mail | corporate.secretary@banksinarmas.com |
| Media Sosial<br>Social Media | Facebook : Bank Sinarmas |
| | X : @BankSinarmas |
| | Instagram : @BankSinarmas |
| | Youtube : BankSinarmas |
| | LinkedIn : BankSinarmas |
| | TikTok : @banksinarmasofficial |



# SISTEM PELAPORAN PELANGGARAN
[GRI 2-16][GRI 2-26]
## Whistleblowing System

Industri perbankan merupakan sektor yang sangat vital dalam perekonomian global. Sebagai lembaga yang berperan dalam mengelola aliran uang dan transaksi keuangan, Bank harus memelihara integritas dan kepercayaan publik. Salah satu cara untuk memastikan keberlanjutan tersebut adalah dengan membangun sistem pelaporan pelanggaran dan manajemen *anti-fraud* (penipuan) yang efektif.

### Pentingnya Sistem Pelaporan Pelanggaran yang Efektif

Sistem pelaporan pelanggaran yang baik adalah fondasi utama dalam upaya mencegah dan mengidentifikasi praktik *fraud* (penipuan) atau pelanggaran lainnya yang terjadi di dalam perbankan. Pelanggaran ini bisa terjadi pada berbagai level, baik dari pegawai bank, nasabah, atau pihak ketiga yang terlibat dalam transaksi. Tanpa sistem pelaporan yang transparan dan aman, akan sulit untuk mendeteksi kesalahan

The banking industry constitutes a highly vital sector within the global economy. As institutions entrusted with managing the flow of funds and financial transactions, banks are required to uphold the highest standards of integrity and public trust. Ensuring long-term sustainability necessitates, among other things, the establishment of a robust whistleblowing system and an effective anti-fraud management framework.

### The Importance of an Effective Whistleblowing System

A well-functioning whistleblowing system serves as a fundamental pillar in the prevention and detection of fraud and other forms of misconduct within the banking sector. Such violations may occur at various levels, involving bank employees, customers, or third parties engaged in transactions. Without a transparent and secure reporting mechanism, it becomes exceedingly difficult to uncover

atau tindak pidana yang bisa merugikan bank, nasabah, dan perekonomian secara keseluruhan.

Sistem pelaporan harus memastikan bahwa setiap laporan pelanggaran dapat diakses dengan mudah oleh pihak yang berwenang, namun tetap menjaga kerahasiaan dan keamanan data pelapor. Hal ini penting untuk mencegah intimidasi atau pembalasan terhadap individu yang berani melaporkan pelanggaran yang terjadi. Sistem pelaporan Bank Sinarmas sudah menyesuaikan dengan teknologi terkini, agar mempercepat dan mempermudah pelaporan, dengan tetap mengedepankan kerahasiaan pelapor.

Bank Sinarmas telah menerapkan sistem pelaporan pelanggaran (*whistleblowing system*/WBS) sebagai saluran komunikasi bagi pihak internal dan eksternal untuk melaporkan tindakan *fraud*, pelanggaran hukum, Kode Etik, dan/atau benturan kepentingan yang dilakukan oleh karyawan atau pimpinan Bank. Pengaduan yang disampaikan melalui WBS harus didasarkan pada itikad baik dan tidak boleh berupa keluhan pribadi atau fitnah. Selain itu, WBS dilaksanakan sebagai wujud penerapan GCG agar tercipta situasi kerja yang bersih dan bertanggung jawab.

Bank telah menyusun Kebijakan WBS yang disahkan melalui Surat Keputusan SK.013/2024/DIR1-AFM pada 3 Desember 2024. Bank juga mengikuti pedoman dari peraturan Bank Indonesia dan Otoritas Jasa Keuangan, terutama Otoritas Jasa Keuangan No. 12 Tahun 2024 tentang Penerapan Strategi Anti Fraud bagi Lembaga Jasa Keuangan.

WBS Bank Sinarmas dikelola secara mandiri oleh internal Bank secara Independen dan profesional, di mana petugas yang menerima laporan adalah petugas khusus yang ditunjuk langsung oleh Direktur Utama. Sementara itu, Dewan Komisaris berperan aktif dalam pelaksanaan dan pengawasan atas penerapan sistem pelaporan pelanggaran Bank. Peran aktif yang dilakukan Dewan Komisaris, di antaranya menerima dan mengkaji laporan yang disampaikan *Anti-Fraud Management* (AFM) sebagai koordinator penanganan *whistleblowing* melalui Komite Pemantau Risiko secara berkala setiap triwulan. Laporan yang disampaikan berisikan terkait jumlah laporan yang masuk, yang terbukti dan tidak terbukti, sanksi yang diberikan kepada karyawan bila terbukti melakukan *fraud*/pelanggaran, serta tindak lanjut yang dilakukan oleh Bank terhadap kasus yang dilaporkan.

wrongdoing or criminal acts that could harm the bank, its clients, and the broader economy..

The reporting system must ensure that all violation reports are readily accessible to authorized parties while maintaining the confidentiality and security of the whistleblower's data. This is essential to prevent any form of intimidation or retaliation against individuals who come forward to report misconduct. Bank Sinarmas has adopted a whistleblowing system that leverages the latest technology to facilitate faster and more convenient reporting, without compromising the confidentiality of the whistleblower.

Bank Sinarmas has implemented a Whistleblowing System (WBS) as a communication channel for both internal and external parties to report incidents of fraud, legal violations, breaches of the Code of Ethics, and/or conflicts of interest involving Bank employees or management. Reports submitted through the WBS must be made in good faith and must not constitute personal grievances or defamatory content. The WBS also reflects the Bank's commitment to Good Corporate Governance (GCG) and aims to foster a clean and accountable working environment.

The Bank has prepared a WBS Policy, which was ratified through Decree SK.013/2024/DIR1-AFM on December 3, 2024. The Bank also follows the guidelines of Bank Indonesia and Financial Services Authority regulations, especially Financial Services Authority No. 12 of 2024 concerning the Implementation of Anti-Fraud Strategies for Financial Services Institutions.

Bank Sinarmas' WBS is managed independently by the Bank's internal independently and professionally, where the officer who receives the report is a special officer appointed directly by the President Director. Meanwhile, the Board of Commissioners plays an active role in the implementation and supervision of the Bank's violation reporting system. The active role carried out by the Board of Commissioners includes receiving and reviewing reports submitted by Anti-Fraud Management (AFM) as the coordinator of whistleblowing handling through the Risk Monitoring Committee periodically every quarter. The reports submitted contain the number of reports received, those that are proven and unproven, sanctions given to employees if proven to have committed fraud/violations, and follow-up actions taken by the Bank on reported cases.

## Tujuan dan Manfaat *Whistleblowing System*

## Purpose and Benefits of the Whistleblowing System

| Tujuan<br>Purpose | Manfaat<br>Benefits |
|---|---|
| Sebagai sarana bagi pelapor untuk melaporkan tindakan *fraud*, pelanggaran kode etik, kebijakan internal Bank Sinarmas lainnya tanpa rasa takut atau khawatir karena dijamin kerahasiaannya.<br><br>The system serves as a platform for whistleblowers to report fraudulent activities, breaches of the Code of Ethics, and other internal policies of Bank Sinarmas without fear or concern, as confidentiality is guaranteed. | Tersedianya cara penyampaian informasi penting dan kritis bagi perusahaan kepada pihak yang harus segera menanganinya secara aman.<br><br>It provides a secure means of communicating important and critical information to the relevant parties who must address it promptly. |
| Agar indikasi *fraud* yang terjadi dapat dideteksi dan dicegah sedini mungkin.<br><br>To ensure that indications of fraud are detected and prevented at the earliest possible stage | Tersedianya mekanisme deteksi dini (*early warning system*) atas kemungkinan terjadinya masalah akibat suatu pelanggaran.<br><br>The availability of an early warning system to detect potential issues arising from any violations. |



## Pengelola Pengaduan

Bank Sinarmas telah menunjuk *Whistleblowing Officer* (WO), seorang petugas yang secara khusus ditunjuk oleh Direktur Utama untuk mengelola dan menganalisis pengaduan atau pelaporan yang diterima.

## Jenis Pelaporan

- **Pelaporan Internal**: Pelaporan oleh pegawai bank terhadap rekan sejawat atau pihak manajemen yang terlibat dalam pelanggaran.
- **Pelaporan Eksternal**: Pelaporan oleh nasabah atau pihak ketiga yang melihat adanya indikasi pelanggaran atau penyalahgunaan.

## Alur Penanganan Pengaduan

1. Pelapor/*whistleblower* melakukan laporan pelanggaran melalui sarana pengaduan. WO bertugas untuk menerima, menganalisis, menindaklanjuti dan memonitor laporan tersebut. WO akan meminta data tambahan kepada pelapor jika diperlukan dalam jangka waktu 10 hari kerja. WO memastikan data yang disampaikan sudah memadai dan memenuhi kriteria.
2. WO berkoordinasi dengan Divisi *Anti-Fraud*, Satuan Kerja Audit Internal, Unit Anti Penyuapan, Divisi HCM, dan kantor cabang. Dalam waktu maksimal 3 hari kerja laporan pengaduan wajib sudah diberikan kepada unit kerja terkait. Setiap unit kerja memiliki tugas dan tanggung jawab untuk melakukan deteksi awal, investigasi, validasi sampai dengan penyelesaian atas kasus kecurangan ataupun penyimpangan lainnya.
3. WO akan memberikan informasi terkait status perkembangan pelaporan yang telah diteruskan ke Unit kerja Investigasi kepada pelapor. Perkembangan informasi yang diberikan Unit Kerja Investigasi selambat-lambatnya 1 bulan sejak tanggal pelaporan.
4. WO wajib melakukan *monitoring* dan melaporkan jumlah pengaduan yang masuk setiap 3 bulan kepada Direktur Utama dengan tembusan kepada Direktur Kepatuhan. Selain itu, WO juga wajib melakukan dokumentasi penerimaan pelaporan dengan tertib dan rahasia.

## Complaints Management

Bank Sinarmas has appointed a Whistleblowing Officer (WO), an officer specifically appointed by the President Director to manage and analyze complaints or reports received.

## Types of Reporting

- **Internal Reporting**: Reporting by bank employees to colleagues or management involved in violations.
- **External Reporting**: Reporting by customers or third parties who see indications of violations or abuse.

## Complaint Handling Flow

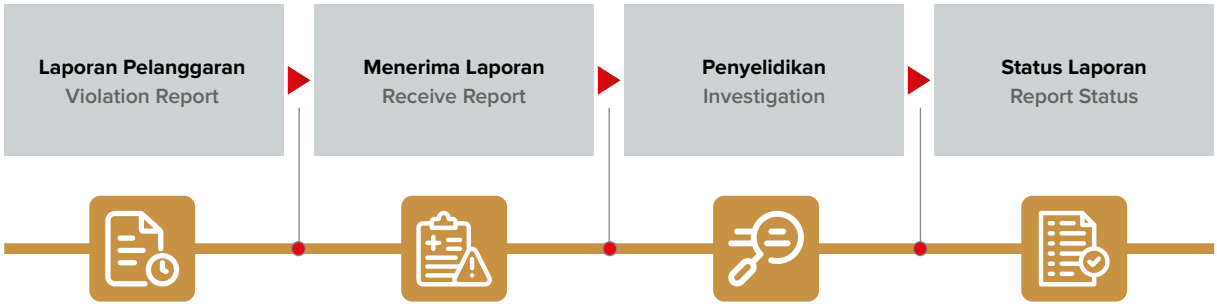
1. The reporter/whistleblower reports violations through the complaint facility. The WO is tasked with receiving, analyzing, following up and monitoring the report. The WO will request additional data from the reporter if necessary within 10 working days. The WO ensures that the data submitted is sufficient and meets the criteria.
2. The WO coordinates with the Anti-Fraud Division, Internal Audit Work Unit, Anti-Bribery Unit, HCM Division, and branch offices. Within a maximum of 3 working days, the complaint report must be submitted to the relevant work unit. Each work unit has the task and responsibility to conduct early detection, investigation, validation until the resolution of fraud cases or other irregularities.
3. WO will provide information related to the status of the progress of the report that has been forwarded to the Investigation Work Unit to the reporter. The development of information provided by the Investigation Work Unit is no later than 1 month from the date of reporting.
4. WO is required to monitor and report the number of complaints received every 3 months to the President Director with a copy to the Compliance Director. In addition, WO is also required to document the receipt of reports in an orderly and confidential manner.

5. Divisi *Anti-Fraud* akan menyampaikan laporan hasil penanganan pengaduan kepada manajemen berisi kesimpulan, rekomendasi perbaikan sistem pengendalian intern jika dinilai masih terdapat kelemahan, serta rekomendasi pemberian sanksi kepada petugas terkait kelemahan yang ditimbulkan. Penanganan dari kasus yang dilaporkan bertujuan untuk memperkuat sistem pengendalian intern dan memotivasi seluruh pihak/karyawan untuk menghindari kegiatan/transaksi yang dapat berpotensi/berakibat merugikan maupun mengganggu operasional Bank.

5. The Anti-Fraud Division will submit a report on the results of handling complaints to management containing conclusions, recommendations for improving the internal control system if it is considered that there are still weaknesses, and recommendations for imposing sanctions on officers related to the weaknesses that arise. Handling of reported cases aims to strengthen the internal control system and motivate all parties/employees to avoid activities/transactions that can potentially/have detrimental consequences or disrupt Bank operations.

## Bagan Alur Pelaporan Pelanggaran

## Flowchart for Reporting Violations




## Cara Penyampaian Laporan Pelanggaran

Pelapor, baik dari pihak internal maupun eksternal, dapat menyampaikan laporannya melalui sarana pengaduan dengan memenuhi ketentuan pelaporan.

## Sarana Pengaduan

Situs Web : www.banksinarmas.com
E-mail : infokan@banksinarmas.com
WhatsApp : 0881 1500 153
Telepon : 0881 1500 153
SMS : 0881 1500 153
Line : 0881 1500 153

## Hal-hal yang Harus Dipenuhi oleh Pelapor

Untuk mempermudah dan mempercepat proses tindak lanjut, terdapat beberapa hal yang harus dipenuhi oleh pelapor dalam menyampaikan pengaduannya.

1. Memberikan informasi mengenai identitas diri pelapor untuk memudahkan komunikasi dengan pelapor, sekurang-kurangnya:
   a. Nama pelapor (diperbolehkan menggunakan anonim);
   b. No. telepon/alamat e-mail yang dapat dihubungi.
2. Harus memberikan indikasi awal yang dapat dipertanggungjawabkan (5W & 1H) yang meliputi:
   a. Indikasi/fakta penyimpangan atau pelanggaran yang terjadi (*What*);
   b. Pihak yang diindikasikan sebagai pelaku dan/atau pihak yang terlibat (*Who*);
   c. Kapan dan di mana terjadinya (*When*);
   d. Kenapa penyimpangan/pelanggaran dapat terjadi (Why);
   e. Modus/cara yang digunakan (*How*);

## How to Submit a Violation Report

The reporter, both from internal and external parties, can submit their report through the complaint facility by fulfilling the reporting requirements.

## Complaint Facilities

Website : www.banksinarmas.com
E-mail : infokan@banksinarmas.com
WhatsApp : 0881 1500 153
Telephone : 0881 1500 153
SMS : 0881 1500 153
Line : 0881 1500 153

## Things That Must Be Fulfilled by the Reporter

To facilitate and accelerate the follow-up process, there are several things that must be fulfilled by the reporter in submitting their complaint.

1. Provide information regarding the reporter's identity to facilitate communication with the reporter, at least:
   a. Reporter's name (allowed to use anonymous);
   b. Telephone number/e-mail address that can be contacted.
2. Must provide an initial indication that can be accounted for (5W & 1H), which includes:
   a. Indication/fact of deviation or violation that occurred (What);
   b. The party indicated as the perpetrator and/or party involved (Who);
   c. When and where it occurred (When);
   d. Why the deviation/violation could occur (Why);
   e. The mode/method used (How);

f. Potensi kerugian yang diderita oleh Bank (untuk kasus yang melibatkan aspek finansial);
g. Keterangan/informasi lain yang dianggap perlu, seperti adanya perubahan sikap/perilaku/gaya hidup maupun tingkat konsumsi yang diduga atau patut diduga menunjukkan ketidakwajaran sesuai dengan kemampuan karyawan tersebut.

3. Laporan yang disampaikan harus berhubungan dengan:
   a. Pelanggaran yang dapat menimbulkan kerugian finansial maupun non-finansial;
   b. Pelanggaran hukum;
   c. Pelanggaran Kode Etik;
   d. Pelanggaran benturan kepentingan;
   e. Pelanggaran lainnya yang dapat dipersamakan dengan itu.

f. Potential losses suffered by the Bank (for cases involving financial aspects);
g. Other information/statements deemed necessary, such as changes in attitude/behavior/lifestyle or consumption levels that are suspected or should be suspected of indicating irregularities in accordance with the employee's capabilities.

3. The report submitted must relate to:
   a. Violations that can cause financial or non-financial losses;
   b. Violations of the law;
   c. Violations of the Code of Ethics;
   d. Violations of conflict of interest;
   e. Other violations that can be equated with that.



## Perlindungan Bagi Pelapor

Bank menjamin perlindungan bagi pelapor, mencakup:

1. Jaminan kerahasiaan identitas pelapor dan isi laporan yang disampaikan;
2. Jaminan perlindungan terhadap perlakuan yang merugikan pelapor; dan
3. Jaminan perlindungan dari kemungkinan adanya tindakan ancaman, intimidasi, hukuman ataupun tindakan tidak menyenangkan lainnya dari pihak terlapor.

## Protection for Whistleblowers

The Bank guarantees protection for whistleblowers, including:

1. Guarantee of confidentiality of the whistleblower's identity and the contents of the report submitted;
2. Guarantee of protection against treatment that is detrimental to the whistleblower; and
3. Guarantee of protection from possible threats, intimidation, punishment or other unpleasant actions from the reported party.

## Jumlah Pengaduan

Pada tahun 2024, Bank menerima 11 laporan terkait pengaduan pelanggaran yang masuk melalui saluran *Whistleblowing System*, baik melalui telepon, *e-mail,* WhatsApp, dan Line.

## Number of Complaints

In 2024, the Bank received 11 reports related to complaints of violations received through the Whistleblowing System channel, either by telephone, e-mail, WhatsApp, and Line.

| Tahun<br>Year | Media Pelaporan<br>Media for Reporting | | | | | Tindak Lanjut Pengaduan<br>Complaint Follow-up | |
|---|---|---|---|---|---|---|---|
| | *E-mail* | SMS | Telepon | *Messenger* | *Website* | Laporan dalam Proses<br>Reports in Process | Laporan yang Selesai Ditindaklanjuti<br>Reports that Has been Followed Up and Resolved |
| 2024 | 7 | 0 | 0 | 2 | 2 | 1 | 10 |

## Pemberian Sanksi terkait Laporan

Berdasarkan laporan terkait indikasi *fraud* yang disampaikan melalui WBS selama tahun 2024, Bank telah memberikan sanksi kepada 2 karyawan yang terindikasi melakukan *fraud*.

## Imposition of Sanctions Related to Reports

In 2024, based on reports of fraud indications submitted through the WBS, the Bank imposed sanctions on two employees identified as having engaged in fraudulent activities.

## Pakta Integritas

Dalam rangka mengembangkan budaya dan kepedulian *anti-fraud* di seluruh jenjang organisasi dan sebagai bentuk pernyataan anti terhadap *fraud*, maka seluruh Manajemen dan karyawan memerlukan komitmen yang sungguh-sungguh dari seluruh jajaran yang ada pada PT. Bank Sinarmas Tbk. Merujuk Peraturan Otoritas Jasa Keuangan No. 12 Tahun 2024 tentang Penerapan Strategi *Anti-Fraud* bagi Lembaga Jasa Keuangan, disebutkan bahwa penerapan Strategi *Anti-Fraud* dilakukan antara lain dengan cara menumbuhkan kesadaran atas risiko serta kepedulian dari Budaya *Anti-Fraud* pada seluruh Jajaran Organisasi Bank, di antaranya dengan penandatanganan Pakta Integritas.

## Integrity Pact

In order to develop an anti-fraud culture and concern at all levels of the organization and as a form of anti-fraud statement, all Management and employees require a serious commitment from all levels of PT. Bank Sinarmas Tbk. Referring to Financial Services Authority Regulation No. 12 of 2024 concerning the Implementation of Anti-Fraud Strategy for Financial Services Institutions, it is stated that the implementation of the Anti-Fraud Strategy is carried out, among others, by raising awareness of the risks and concerns of the Anti-Fraud Culture throughout the Bank's Organizational Ranks, including by signing the Integrity Pact.

Di saat diperlukannya sebuah komitmen bersama dengan menunjukkan iktikad, baik untuk menumbuhkan budaya sadar risiko (*Risk Culture*) maupun kepedulian *Anti-Fraud*, maka perlu kiranya melaksanakan penandatanganan Deklarasi *Anti-Fraud* dan Pakta Integritas. Penandatanganan Pakta Integritas dilakukan oleh Dewan Komisaris dan Dewan Direksi yang kemudian diikuti atestasi oleh seluruh karyawan. Penandatanganan Pakta Integritas dilakukan secara berkala sebanyak 2 kali dalam 1 Tahun.

When a joint commitment is needed by showing good faith, both to foster a risk-aware culture (Risk Culture) and Anti-Fraud concern, it is necessary to sign the Anti-Fraud Declaration and Integrity Pact. The signing of the Integrity Pact was carried out by the Board of Commissioners and the Board of Directors, followed by attestation by all employees. The signing of the Integrity Pact is carried out periodically twice in 1 year.



# KODE ETIK DAN PEDOMAN TINGKAH LAKU

## Code of Ethics and Guidelines of Conduct

Kebijakan Kode Etik dan Pedoman Tingkah Laku merupakan pedoman dasar dalam bersikap dan bertindak bagi seluruh insan Bank Sinarmas serta menjadi bagian integral dari kebijakan perusahaan. Setiap keputusan dan tindakan yang diambil atas nama perusahaan diarahkan oleh standar integritas pribadi dan profesional yang tinggi, sesuai dengan ketentuan perundang-undangan yang berlaku. Detail tentang Kebijakan Kode Etik dan Pedoman Tingkah Laku yang disusun oleh Divisi Organization Development & Industrial Relations – Group Human Capital Management berlaku sejak 20 September 2023, dan telah dipublikasikan di situs web Bank pada laman Hubungan Investor bagian Kebijakan Terkait Tata Kelola.

The Code of Ethics and Guidelines of Conduct Policy is a basic guideline for behaving and acting for all Bank Sinarmas employees and is an integral part of the company's policy. Every decision and action taken on behalf of the company is guided by high standards of personal and professional integrity, in accordance with applicable laws and regulations. Details of the Code of Ethics and Guidelines of Conduct Policy prepared by the Organization Development & Industrial Relations Division - Group Human Capital Management have been in effect since September 20, 2023, and have been published on the Bank's website on the Investor Relations page under Policies Related to Governance.

### Pokok-Pokok Kode Etik dan Pedoman Tingkah Laku

Kode Etik dan Pedoman Tingkah Laku Bank Sinarmas menguraikan secara ringkas prinsip, kebijakan, dan peraturan yang mengatur kegiatan Bank yang harus ditaati oleh seluruh karyawan dan pihak lain yang bekerja dengan Bank atau yang mewakili Bank baik secara langsung maupun tidak langsung sebagaimana tertuang dalam Surat Keputusan No.SK.114/2023/PRESDIR-HCSS tentang Kebijakan Kode Etik dan Pedoman Tingkah Laku. Kode Etik dan Pedoman Tingkah Laku Bank Sinarmas terdiri dari 10 (sepuluh) bagian, yaitu:

1. Ketentuan Umum
2. Hubungan dengan Perusahaan;
3. Hubungan dengan Nasabah;
4. Hubungan dengan Rekanan (pemasok/*suppliers*, vendor, konsultan);
5. Hubungan dengan Pesaing;
6. Hubungan dengan Pemegang Saham;
7. Hubungan dengan Regulator;

### Main Points of the Code of Ethics and Guidelines of Conduct

Bank Sinarmas' Code of Ethics and Guidelines of Conduct briefly outlines the principles, policies, and regulations governing the Bank's activities that must be adhered to by all employees and other parties working with the Bank or representing the Bank, either directly or indirectly, as stated in Decree No.SK.114/2023/PRESDIR-HCSS concerning the Code of Ethics and Guidelines of Conduct Policy. Bank Sinarmas' Code of Ethics and Guidelines of Conduct consist of 10 (ten) parts, namely:

1. General Provisions
2. Relationship with the Company;
3. Relationship with Customers;
4. Relationship with Partners (suppliers, vendors, consultants);
5. Relationship with Competitors;
6. Relationship with Shareholders;
7. Relationship with Regulators;

8. Hubungan dengan *Stakeholder* lainnya;
9. Penerimaan dan pemberian hadiah/bingkisan/kompensasi/hiburan (*entertainment*); dan
10. Pelaporan atas pelanggaran atau potensi pelanggaran.

## Pengungkapan bahwa Kode Etik dan Pedoman Tingkah Laku Berlaku bagi Seluruh Level Organisasi

Kode Etik dan Pedoman Tingkah Laku berlaku bagi seluruh insan Bank, termasuk Dewan Komisaris, Direksi, komite-komite di bawah Komisaris dan Direksi serta seluruh Karyawan. Pihak Manajemen Bank Sinarmas dijadikan sebagai panutan (*role model*) bagi bawahannya dalam hal kepatuhan pada Kode Etik dan Pedoman Tingkah Laku. Selain itu, pihak eksternal yang berhubungan langsung dengan Bank Sinarmas, wajib mematuhi Kode Etik dan Pedoman Tingkah Laku.

## Penyebarluasan/Sosialisasi Kode Etik dan Pedoman Tingkah Laku

Sosialisasi terkait Kode Etik dan Pedoman Tingkah Laku disampaikan kepada karyawan mulai dari *top management* sampai dengan level operasional. Bank memanfaatkan berbagai media yang dimiliki, termasuk pemanfaatan melalui media teknologi informasi yang dapat diakses oleh semua karyawan dengan mudah setiap saat.

Selain itu, Bank juga menyampaikan Surat Keputusan Direksi tentang Kode Etik dan Pedoman Tingkah Laku melalui situs web Bank, platform *e-learning*, dan portal Bank Sinarmas. Sementara itu, bagi karyawan baru diwajibkan untuk membaca, memahami, dan memberikan persetujuan atas Kode Etik dan Pedoman Tingkah Laku pertama kali bergabung, yaitu saat menjalani *induction*, sedangkan untuk karyawan *existing* wajib melakukan *refreshment* secara berkala melalui platform *e-learning*.

## Jenis Sanksi untuk Setiap Pelanggaran Kode Etik dan Pedoman Tingkah Laku

Sanksi bagi pihak yang terbukti melakukan pelanggaran terkait Kode Etik dan Pedoman Tingkah Laku diberikan secara bertahap, mulai dari pemberian Surat Peringatan sampai dengan Pemutusan Hubungan Kerja (PHK) sesuai dengan ketentuan dan perundang-undangan yang berlaku. Karyawan yang mengetahui secara sadar terjadinya pelanggaran terkait Kode Etik dan Pedoman Tingkah Laku namun tidak melaporkannya, dapat dianggap melakukan tindakan pembiaran sehingga dapat dikenakan sanksi mengacu pada ketentuan internal yang berlaku.

Sementara pihak yang dirugikan, baik langsung maupun tidak langsung akibat penyalahgunaan wewenang dan pelanggaran Kode Etik dan Pedoman Tingkah Laku oleh pengusaha dan/atau karyawan, dapat menyampaikannya melalui mekanisme yang telah diatur dalam bagian tersendiri dalam Kode Etik dan Pedoman Tingkah Laku.

8. Relationship with other Stakeholders;
9. Acceptance and giving of gifts/parcels/compensation/entertainment; and
10. Reporting of violations or potential violations.

## Disclosure that the Code of Ethics and Code of Conduct Applies to All Levels of the Organization

The Code of Ethics and Code of Conduct apply to all Bank personnel, including the Board of Commissioners, Board of Directors, committees under the Board of Commissioners and Board of Directors, and all Employees. Bank Sinarmas Management is used as a role model for its subordinates in terms of compliance with the Code of Ethics and Code of Conduct. In addition, external parties who are directly related to Bank Sinarmas are required to comply with the Code of Ethics and Code of Conduct.

## Dissemination/Socialization of the Code of Ethics and Code of Conduct

Socialization related to the Code of Ethics and Code of Conduct is conveyed to employees starting from top management to the operational level. The Bank utilizes various media owned, including utilization through information technology media that can be easily accessed by all employees at any time.

In addition, the Bank also conveys the Board of Directors' Decree on the Code of Ethics and Code of Conduct through the Bank's website, e-learning platform, and the Bank Sinarmas portal. Meanwhile, new employees are required to read, understand, and give their approval to the Code of Ethics and Guidelines for Conduct when they first join, namely during induction, while existing employees are required to carry out periodic refreshments through the e-learning platform.

## Types of Sanctions for Each Violation of the Code of Ethics and Guidelines for Conduct

Sanctions for individuals proven to have violated the Code of Ethics and Conduct Guidelines are applied progressively, ranging from the issuance of a Warning Letter to Termination of Employment (PHK), in accordance with applicable laws and regulations. Employees who are aware of violations related to the Code of Ethics and Conduct Guidelines but fail to report them may be considered to have condoned the actions and may be subject to sanctions based on the relevant internal regulations.

Meanwhile, any parties who are directly or indirectly harmed due to the abuse of authority or violations of the Code of Ethics and Conduct Guidelines by employers and/or employees may report the issue through the mechanisms outlined in a separate section of the Code of Ethics and Conduct Guidelines.

# KEBIJAKAN ANTI KORUPSI
## Anti-Corruption Policy

### Program dan Prosedur
Bank Sinarmas telah mengimplementasikan prinsip-prinsip anti korupsi, sebagaimana tertuang dalam pasal-pasal Peraturan Perusahaan, Kode Etik dan Pedoman Tingkah Laku, dan SOP Kedisiplinan Karyawan. Untuk menangani praktik korupsi, balas jasa (*kickbacks*), *fraud*, suap, dan/atau gratifikasi, Bank telah menetapkan sejumlah prosedur yang diatur dalam Kode Etik dan Pedoman Tingkah Laku Versi 2.0.

Bank juga telah merumuskan etika bisnis dan perilaku sebagai bagian integral dari komitmen integritas, yang diiringi dengan pengembangan sistem manajemen risiko yang disesuaikan dengan menjunjung tinggi prinsip kehati-hatian dan GCG.

### Pelatihan dan Sosialisasi Anti Korupsi
Bank Sinarmas memiliki komitmen kuat dalam menanamkan budaya sadar risiko (*risk culture*) dan kepedulian *anti-fraud* di seluruh lapisan organisasi. Hal ini diwujudkan melalui berbagai upaya, termasuk Sosialisasi Tatap Muka, Pengisian Deklarasi *Anti-Fraud*, dan Pakta Integritas melalui aplikasi SIDILAN serta Sosialisasi melalui *e-mail*, media sosial, Lensa Berita, Kamis *Sharing, Podcast, E-Learning* Video Scorm, artikel situs web Bank Sinarmas, ATM *Idle Screen*, AD Desktop, dan metode lainnya.

### Pakta Integritas
Dalam rangka mengembangkan budaya dan kepedulian *anti-fraud* di seluruh jenjang organisasi dan sebagai bentuk pernyataan anti terhadap *fraud*, maka seluruh Manajemen dan karyawan memerlukan komitmen yang sungguh-sungguh dari seluruh jajaran yang ada pada PT. Bank Sinarmas Tbk. Merujuk Peraturan Otoritas Jasa Keuangan No. 39/POJK.03/2019 tanggal 19 Desember 2019 tentang Penerapan Strategi *Anti-Fraud* bagi Bank Umum, disebutkan bahwa penerapan Strategi *Anti-Fraud* dilakukan antara lain dengan cara menumbuhkan kesadaran atas risiko serta kepedulian dari Budaya *Anti-Fraud* pada seluruh Jajaran Organisasi Bank, di antaranya dengan penandatanganan Pakta Integritas.

Di saat diperlukannya sebuah komitmen bersama dengan menunjukkan iktikad, baik untuk menumbuhkan Budaya Sadar Risiko (*Risk Culture*) dan kepedulian *Anti-Fraud*, maka perlu kiranya melaksanakan penandatanganan Deklarasi *Anti-Fraud* dan Pakta Integritas. Penandatanganan Pakta Integritas dilakukan oleh Dewan Komisaris dan Dewan Direksi yang kemudian diikuti atestasi oleh seluruh karyawan. Penandatanganan Pakta Integritas dilakukan secara berkala sebanyak 2 kali dalam 1 Tahun.

### Programs and Procedures
Bank Sinarmas has implemented anti-corruption principles, as stated in the articles of the Company Regulations, Code of Ethics and Guidelines for Conduct, and Employee Discipline SOP. To handle corrupt practices, kickbacks, fraud, bribery, and/or gratification, the Bank has established a number of procedures regulated in the Code of Ethics and Guidelines for Conduct Version 2.0.

The Bank has also formulated business ethics and behavior as an integral part of the integrity commitment, accompanied by the development of a risk management system that is adjusted to uphold the principles of prudence and GCG.

### Anti-Corruption Training and Socialization
Bank Sinarmas has a strong commitment to instilling a risk culture and anti-fraud awareness throughout all levels of the organization. This is realized through various efforts, including Face-to-Face Socialization, Completing the Anti-Fraud Declaration, and the Integrity Pact through the SIDILAN application as well as Socialization via e-mail, social media, News Lens, Thursday Sharing, Podcast, E-Learning Video Scorm, Bank Sinarmas website articles, ATM Idle Screen, AD Desktop, and other methods.

### Integrity Pact
In order to develop an anti-fraud culture and concern at all levels of the organization and as a form of anti-fraud statement, all Management and employees require a serious commitment from all levels at PT. Bank Sinarmas Tbk. Referring to Financial Services Authority Regulation No. 39/POJK.03/2019 dated December 19, 2019 concerning the Implementation of Anti-Fraud Strategy for Commercial Banks, it is stated that the implementation of the Anti-Fraud Strategy is carried out, among others, by raising awareness of the risks and concern for the Anti-Fraud Culture at all levels of the Bank Organization, including by signing the Integrity Pact.

When a joint commitment is needed by showing good faith, both to foster a Risk Awareness Culture and Anti-Fraud concern, it is necessary to carry out the signing of the Anti-Fraud Declaration and Integrity Pact. The signing of the Integrity Pact is carried out by the Board of Commissioners and the Board of Directors, which is then followed by attestation by all employees. The signing of the Integrity Pact is carried out periodically 2 times in 1 year.

## Kebijakan Anti Penyuapan

Dalam rangka meningkatkan kesadaran seluruh karyawan untuk turut serta berupaya mencegah dan menghindari suap, Bank Sinarmas telah memiliki kebijakan dan/atau *standard operating procedure* (SOP) terkait Sistem Manajemen Anti Penyuapan. Adapun Program Anti Penyuapan yang tertuang dalam Kebijakan/SOP tersebut diuraikan sebagai berikut.

1. Berkomitmen untuk selalu menjalankan GCG dalam menjalankan dan mengawasi bisnis perusahaan.
2. Mematuhi peraturan perundang-undangan dan peraturan lain terkait anti penyuapan.
3. Menyelaraskan ketentuan Anti Penyuapan dengan visi misi dan nilai-nilai Bank Sinarmas.
4. Melarang praktik penyuapan di lingkungan Bank berhubungan dengan pekerjaan, untuk menjaga reputasi bank dan objektivitas pengambilan keputusan:
   a. Tidak menoleransi (*zero tolerance*) segala bentuk korupsi dan penyuapan (kepada atau dari; nasabah, relasi, rekanan, regulator, pejabat pemerintah, Karyawan). Tindak pelanggaran atas hal tersebut akan diproses secara perdata atau pidana sesuai dengan ketentuan yang berlaku;
   b. Melarang karyawan untuk menawarkan atau menyediakan pembayaran atau manfaat dalam bentuk apa pun yang tidak resmi atau tidak lazim kepada pihak lain yang berwenang dalam pengambilan keputusan terhadap urusan Bank Sinarmas;
   c. Melarang penawaran imbalan kepada nasabah, Karyawan atau calon nasabah agar mereka berbisnis dengan Bank Sinarmas; dan
   d. Melaporkan kepada atasan, pendekatan apa pun yang dilakukan oleh seseorang atau perusahaan yang diduga bermaksud meminta atau menawarkan imbalan secara pribadi atau suatu kemudahan khusus lainnya.

## Pelaksanaan Sistem Manajemen Anti Penyuapan

Upaya pencegahan praktik suap yang dilakukan Bank Sinarmas, yakni:

1. Bank Sinarmas secara berkelanjutan dan berkala menjalankan Program Awareness untuk peningkatan pemahaman terhadap anti suap dan anti-penyuapan, antara lain melalui seminar, pelatihan, sosialisasi, sharing session dan sebagainya;
2. *Know Your Customers* (KYC), yaitu uji tuntas terhadap (calon) nasabah dan mitra usaha.
   Dalam melakukan uji tuntas terhadap (calon) nasabah dan mitra usaha, Bank mempertimbangkan aspek-aspek risiko yang bisa jadi muncul dalam membangun hubungan dengan (calon) nasabah dan mitra usaha. Uji tuntas harus memastikan bahwa (calon) nasabah dan mitra usaha yang melaksanakan hubungan dengan perusahaan tidak sedang dalam perkara hukum, terlibat penyuapan, kecurangan, pencucian uang dan/atau terindikasi memiliki benturan kepentingan.

## Anti-Bribery Policy

To raise awareness among all employees about the importance of preventing and avoiding bribery, Bank Sinarmas has implemented policies and/or standard operating procedures (SOPs) related to its Anti-Bribery Management System. The Anti-Bribery Program outlined in these Policies/SOPs is described as follows:

1. Committed to always implementing GCG in running and supervising the company's business.
2. Comply with laws and regulations and other regulations related to anti-bribery.
3. Aligning Anti-Bribery provisions with Bank Sinarmas' vision, mission and values.
4. Prohibiting bribery practices in the Bank's environment related to work, to maintain the bank's reputation and objectivity in decision-making:
   a. Zero tolerance for any form of corruption and bribery (to or from; customers, relations, partners, regulators, government officials, employees). Violations of this will be processed civilly or criminally in accordance with applicable provisions;
   b. Prohibiting employees from offering or providing payments or benefits in any form that are not official or unusual to other parties who are authorized to make decisions regarding Bank Sinarmas affairs;
   c. Prohibiting offers of rewards to customers, employees or prospective customers so that they do business with Bank Sinarmas; and
   d. Report to superior any approach made by a person or company that is suspected of seeking or offering personal rewards or other special favors.

## Implementation of the Anti-Bribery Management System

To prevent bribery practices, Bank Sinarmas undertakes the following measures:

1. Bank Sinarmas continuously and periodically runs an Awareness Program to increase understanding of anti-bribery and anti-bribery, including through seminars, training, socialization, sharing sessions and so on;
2. Know Your Customers (KYC), which is due diligence on (potential) customers and business partners.
   In conducting due diligence on (potential) customers and business partners, the Bank considers aspects of risk that may arise in building relationships with (potential) customers and business partners. Due diligence must ensure that (potential) customers and business partners who carry out relationships with the company are not in legal cases, involved in bribery, fraud, money laundering and/or indicated to have a conflict of interest.

3. *Know Your Employee* (KYE), yaitu uji tuntas terhadap calon karyawan maupun kepada karyawan.
   Salah satu tujuan uji tuntas kepada karyawan dan calon karyawan adalah untuk mengurangi munculnya risiko benturan kepentingan dalam aktivitas perusahaan. Hal ini penting bagi perusahaan agar integritas karyawan tetap terjaga dan di saat yang sama melindungi kepentingan perusahaan.

3. Know Your Employee (KYE), which is due diligence on prospective employees and employees.
   One of the objectives of due diligence on employees and prospective employees is to reduce the risk of conflict of interest in company activities. This is important for the company so that employee integrity is maintained and at the same time protects the interests of the company.

## Sosialisasi dan Kampanye Anti Penyuapan

Bank senantiasa melakukan sosialisasi dan Kampanye Anti Penyuapan kepada seluruh karyawan sebagai upaya mencegah adanya tidak penyuapan maupun gratifikasi di lingkungan Bank.

Pada tahun 2024, Kampanye Anti Penyuapan telah dilaksanakan sebanyak 12 kali, yang diuraikan sebagai berikut.

## Anti-Bribery Socialization and Campaign

The Bank always conducts socialization and Anti-Bribery Campaign to all employees as an effort to prevent bribery or gratification in the Bank's environment.

In 2024, the Anti-Bribery Campaign has been implemented 12 times, which are described as follows.

| No. | Kampanye Anti Penyuapan<br>Anti Bribery Campaign | Tanggal Blast Kampanye Anti Penyuapan<br>Anti-Bribery Campaign Blasting Date |
|---|---|---|
| 1. | Pahami Kebijakan Pemberian/Penerimaan Hadiah<br>Understand the Policy on Giving/Receiving Gifts | 1 Februari 2024<br>February 1, 2024 |
| 2. | Tata Tertib Berpolitik di Lingkungan Perusahaan<br>Political Rules in the Company Environment | 6 Februari 2024<br>February 6, 2024 |
| 3. | Jauhi Gratifikasi dalam Menyambut Hari Raya Idulfitri 1445 H<br>Avoid Gratification in Welcoming Eid al-Fitr 1445 H | 1 April 2024<br>April 1, 2024 |
| 4. | Perbedaan Gratifikasi dengan Hadiah<br>The Difference Between Gratification and Gifts | 29 April 2024<br>April 29, 2024 |
| 5. | Praktik Penerapan Gratifikasi<br>Practice of Implementing Gratification | 30 Mei 2024<br>May 30, 2024 |
| 6. | Tolak Gratifikasi dengan PROVE IT<br>Reject Gratification with PROVE IT | 19 Juni 2024<br>June 19, 2024 |
| 7. | Memberi Pelayanan Sepenuh Hati<br>Providing Service Wholeheartedly | 7 Agustus 2024<br>August 7, 2024 |
| 8. | Hati-hati! Gratifikasi Akar dari Korupsi<br>Be Careful! Gratification is the Root of Corruption | 27 Agustus 2024<br>August 27, 2024 |
| 9. | Hindari "5 LOVE LANGUAGES" yang Berujung Gratifikasi<br>Avoid the "5 LOVE LANGUAGES" that Lead to Gratification | 17 September 2024<br>September 17, 2024 |
| 10. | Perbedaan Gratifikasi, Pemerasan, dan Suap<br>The Difference Between Gratification, Extortion, and Bribery | 15 Oktober 2024<br>October 15, 2024 |
| 11 | Jangan Takut Laporkan Gratifikasi!<br>Don't Be Afraid to Report Gratification! | 19 November 2024<br>November 19, 2024 |
| 12 | Sambut Natal & Tahun Baru Tanpa Gratifikasi<br>Welcome Christmas & New Year Without Gratification | 20 Desember 2024<br>December 20, 2024 |

# PENCEGAHAN TRANSAKSI ORANG DALAM (*INSIDER TRADING*)

## Prevention of Insider Trading

Kebijakan terkait *insider trading* Bank Sinarmas telah tercantum dalam Kode Etik dan Tingkah Laku. Ketentuan tersebut mengatur hal-hal berikut.

1. Karyawan tidak boleh melakukan transaksi surat berharga/saham/*forex* apabila ia memiliki informasi dari individu yang memiliki akses ke informasi non-publik tentang hal tersebut. Istilah *trading* tidak hanya dalam hal pembelian, penjualan dan/untuk rekening sendiri, tapi juga untuk keluarga, teman, dan relasi.
2. Pengungkapan atas kepemilikan investasi saham Karyawan di perusahaan yang memiliki kaitan dengan Bank Sinarmas maupun pilar usaha Sinar Mas dilakukan melalui platform *e-learning*.
3. Setiap karyawan harus tunduk pada seluruh hukum, ketentuan dan peraturan yang terkait dengan perdagangan surat berharga/saham/*forex* Perusahaan dan surat berharga/saham perusahaan lain yang dapat terpengaruh oleh kegiatan bisnis Perusahaan. Karyawan tidak boleh menggunakan posisinya sebagai karyawan untuk memperoleh perilaku istimewa dalam membeli atau menjual surat berharga/saham/*forex* untuk kepentingan pribadi, keluarga, teman dan juga relasi.

Bank Sinarmas's insider trading policy is stated in the Code of Ethics and Conduct. These provisions regulate the following matters.

1. Employees may not conduct securities/stocks/forex transactions if they have information from individuals who have access to non-public information about them. The term trading is not only in terms of buying, selling and/or for their own accounts, but also for family, friends, and relations.
2. Disclosure of Employee stock investment ownership in companies related to Bank Sinarmas or Sinar Mas's business pillars is carried out through the e-learning platform.
3. Every employee must comply with all laws, provisions and regulations related to the trading of securities/stocks/forex of the Company and securities/stocks of other companies that may be affected by the Company's business activities. Employees may not use their position as employees to obtain privileged behavior in buying or selling securities/stocks/forex for personal, family, friends and relations interests.

# PRAKTIK BAD CORPORATE GOVERNANCE

## Bad Corporate Governance Practices

Bank Sinarmas mengungkapkan transparansi praktik *bad corporate governance* sebagai wujud komitmen dalam menjalankan aktivitas bisnis secara bertanggung jawab, sesuai dengan peraturan perundang-undangan yang berlaku. Berikut uraian praktik tersebut.

Bank Sinarmas discloses transparency regarding bad corporate governance practices as a form of its commitment to conducting business activities responsibly, in accordance with prevailing laws and regulations. The following outlines such practices.

| Praktik *Bad Corporate Governance*<br>Bad Corporate Governance Practices Description | Keterangan<br>Description |
|---|---|
| Adanya laporan sebagai Bank yang mencemari lingkungan<br>Reports as a Bank that pollutes the environment | Sebagai perusahaan yang bergerak dalam bidang perbankan, Bank Sinarmas tidak memiliki kegiatan yang mencemari lingkungan. Meskipun demikian, Bank memiliki program Green Office yang telah diterapkan di kantor cabang sebagai bukti komitmen kepedulian terhadap lingkungan.<br>As a company engaged in banking, Bank Sinarmas does not have activities that pollute the environment. However, the Bank has a Green Office program that has been implemented in branch offices as proof of its commitment to environmental concern. |
| Perkara penting yang sedang dihadapi oleh Bank, anggota Dewan Komisaris, dan/atau Direksi yang sedang menjabat tidak diungkapkan dalam Laporan Tahunan<br>Important matters currently being faced by the Bank, members of the Board of Commissioners, and/or incumbent Directors are not disclosed in the Annual Report | Sepanjang tahun 2024, tidak terdapat permasalahan hukum, baik yang dihadapi Bank, anggota Dewan Komisaris dan/atau Direksi dan/atau yang sedang menjabat.<br>Throughout 2024, there were no legal issues, either faced by the Bank, members of the Board of Commissioners and/or Directors and/or incumbent Directors. |
| Ketidakpatuhan dalam pemenuhan kewajiban perpajakan<br>Non-compliance in fulfilling tax obligations | Bank Sinarmas telah memenuhi kewajiban perpajakan.<br>Bank Sinarmas has fulfilled its tax obligations. |
| Ketidaksesuaian penyajian Laporan Tahunan dan Laporan Keuangan dengan peraturan yang berlaku dan Standar Akuntansi Keuangan<br>Non-conformity of presentation of Annual Report and Financial Report with applicable regulations and Financial Accounting Standards | Penyusunan Laporan Tahunan dan Keberlanjutan serta Laporan Keuangan telah disesuaikan dengan peraturan dan perundang-undangan yang berlaku. Laporan Tahunan dan Keberlanjutan Bank Sinarmas menginformasikan mengenai Laporan Manajemen Bank mencakup pelaksanaan tugas, tantangan, dan capaian sepanjang tahun 2024 dan telah disusun dengan mengacu pada Peraturan Otoritas Jasa Keuangan No. 29/POJK.04/2016 tentang Laporan Tahunan Emiten atau Perusahaan Publik. Sementara itu, Laporan Keuangan Tahunan Bank Sinarmas juga memberikan informasi pencatatan dari segala transaksi yang berkaitan dengan dana pihak ketiga, kredit, pembelian dan penjualan secara detail dan perhitungan yang akurat selama 1 tahun dan merupakan hasil pertanggungjawaban manajemen atas penggunaan sumber daya yang dipercayakan kepada mereka. Oleh karena itu, penyusunan Laporan Keuangan dibuat sesuai dengan Standar Akuntansi Keuangan yang berlaku. Laporan Keuangan Tahunan yang berakhir pada 31 Desember 2024 juga telah diperiksa dan disahkan oleh KAP yang ditunjuk oleh Bank, yaitu KAP Mirawati Sensi Idris.<br>The preparation of the Annual and Sustainability Reports and Financial Reports has been adjusted to the applicable laws and regulations. The Annual and Sustainability Report of Bank Sinarmas provides information on the Bank's Management Report covering the implementation of tasks, challenges, and achievements throughout 2024 and has been prepared with reference to the Financial Services Authority Regulation No. 29/POJK.04/2016 concerning the Annual Report of Issuers or Public Companies. Meanwhile, the Annual Financial Report of Bank Sinarmas also provides information on the recording of all transactions related to third party funds, credit, purchases and sales in detail and accurate calculations for 1 year and is the result of management's accountability for the use of resources entrusted to them. Therefore, the preparation of the Financial Report is made in accordance with applicable Financial Accounting Standards. The Annual Financial Report ending on December 31, 2024 has also been audited and approved by the KAP appointed by the Bank, namely KAP Mirawati Sensi Idris. |

| Praktik *Bad Corporate Governance*<br>Bad Corporate Governance Practices Description | Keterangan<br>Description |
|---|---|
| Kasus terkait buruh dan karyawan<br>Cases related to laborers and employees | Sepanjang tahun 2024, tidak terdapat kasus terkait buruh dan karyawan di lingkungan Bank Sinarmas.<br>Throughout 2024, there were no cases related to laborers and employees within Bank Sinarmas. |
| Tidak terdapat pengungkapan segmen operasi<br>There is no disclosure of operating segments | Pengungkapan segmen operasi diungkapkan dalam bab Pembahasan dan Analisis Manajemen dalam Laporan Tahunan dan Keberlanjutan ini.<br>Operational segment disclosure is disclosed in the Management Discussion and Analysis chapter in this Annual and Sustainability Report. |
| Terdapat ketidaksesuaian antara Laporan Tahunan hardcopy dengan Laporan Tahunan *softcopy*<br>There is a discrepancy between the hardcopy Annual Report and the softcopy Annual Report | Bank Sinarmas senantiasa melakukan pengecekan sebelum mengunggah Laporan Tahunan dan Keberlanjutan serta memastikan kesesuaian data antara Laporan Tahunan dan Keberlanjutan *hardcopy* dengan *softcopy*.<br>Bank Sinarmas always checks before uploading the Annual and Sustainability Report and ensures the conformity of data between the hardcopy and softcopy Annual and Sustainability Report. |
| **Ketepatan waktu publikasi laporan keuangan & Laporan tahunan**<br>**Timeliness of publication of financial statements & Annual report** | |
| Tanggal penerbitan Laporan Keuangan Tahunan<br>Date of issuance of Annual Financial Report | 26 Maret 2025<br>March 26, 2025<br>Perusahaan menerbitkan Laporan Keuangan Tahunan tepat waktu seperti ditetapkan oleh regulasi.<br>The Company publishes the Annual Financial Report on time as stipulated by the regulation. |
| Tanggal penerbitan Laporan Tahunan<br>Date of issuance of Annual Report | Perusahaan menerbitkan Laporan Tahunan selalu tepat waktu seperti ditetapkan oleh regulasi.<br>The Company publishes the Annual Report always on time as stipulated by the regulation. |
| Opini auditor independen atas laporan keuangan perusahaan<br>Independent auditor's opinion on the company's financial statements | Wajar Tanpa Modifikasian<br>Reasonable Without Modification |
| Apakah terjadi perdagangan orang dalam yang melibatkan direksi/ komisaris, manajemen dan karyawan dalam tiga tahun terakhir?<br>Has there been any insider trading involving directors/commissioners, management and employees in the last three years? | Tidak<br>Perusahaan, termasuk Dewan Komisaris/Direksi, Manajemen maupun karyawan tidak pernah terlibat kasus perdagangan orang dalam (*insider trading*) dalam 3 (tiga) tahun terakhir.<br>No<br>The Company, including the Board of Commissioners/Directors, Management and employees have never been involved in insider trading cases in the last 3 (three) years. |
| Apakah ada kasus ketidakpatuhan terhadap hukum, aturan dan peraturan yang berkaitan dengan transaksi pihak berelasi yang signifikan atau material dalam tiga tahun terakhir?<br>Have there been any cases of non-compliance with laws, rules and regulations relating to significant or material related party transactions in the last three years? | Tidak<br>Perusahaan selalu mematuhi ketentuan peraturan perundang- undangan dalam transaksi dengan pihak berelasi.<br>No<br>The Company always complies with the provisions of laws and regulations in transactions with related parties. |
| Apakah telah terjadi pelanggaran hukum apa pun yang berkaitan dengan masalah perburuhan/ ketenagakerjaan/konsumen/ kepailitan/ komersial/ persaingan atau lingkungan<br>Has there been any violation of the law relating to labor/employment/ consumer/bankruptcy/commercial/ competition or environmental issues? | Tidak<br>Perusahaan belum pernah melakukan pelanggaran hukum yang berkaitan dengan perburuhan/ ketenagakerjaan/konsumen/ kepailitan/komersial/persaingan atau lingkungan<br>No<br>The Company has never committed any violation of the law relating to labor/employment/consumer/ bankruptcy/commercial/competition or environmental issues |

| Praktik *Bad Corporate Governance*<br>Bad Corporate Governance Practices Description | **Keterangan**<br>Description |
|---|---|
| Apakah perusahaan menghadapi sanksi dari regulator karena tidak membuat pengumuman dalam jangka waktu yang ditentukan untuk peristiwa penting (*material event*)?<br>Does the company face sanctions from regulators for not making announcements within the specified timeframe for material events? | Tidak<br>Perusahaan selalu menyampaikan informasi material kepada regulator.<br>No<br>The company always provides material information to regulators |
| Apakah perusahaan memperoleh putusan bersalah dari pengadilan pajak tertinggi terkait masalah perpajakan apa pun selama tiga tahun terakhir<br>Has the company received a guilty verdict from the highest tax court regarding any tax issues in the last three years? | Tidak<br>Perusahaan tidak pernah mengalami sengketa atau permasalahan pajak apa pun dalam 3 (tiga) tahun terakhir.<br>No<br>The company has never experienced any tax disputes or problems in the last 3 (three) years. |

# MANAJEMEN RISIKO
## Risk Management



Manajemen risiko adalah serangkaian metodologi dan prosedur yang digunakan untuk mengidentifikasi, mengukur, memantau, dan mengendalikan risiko yang timbul dari seluruh kegiatan usaha Bank. Bank Sinarmas menerapkan kerangka manajemen risiko yang mencakup strategi, organisasi, kebijakan dan prosedur, serta metodologi manajemen risiko dengan tujuan memastikan seluruh risiko yang dihadapi Bank dapat diidentifikasi, diukur, dipantau, dikendalikan dan disampaikan secara tepat. Agar Penerapan Manajemen Risiko berjalan dengan baik dan efektif maka Bank selalu secara berkesinambungan meningkatkan budaya kesadaran risiko (*risk awareness*), antara lain melalui campaign yang disampaikan melalui *e-mail, banner,* sosialisasi, program pelatihan dan sertifikasi.

### Kebijakan Penerapan Manajemen Risiko

Bank Sinarmas, sebagai pelaku usaha jasa keuangan yang bergerak di bidang perbankan, berkewajiban menerapkan manajemen risiko secara berkelanjutan. Hal ini bertujuan agar Bank dapat tetap beroperasi dengan kondisi finansial yang sehat dan menjalankan bisnis dengan risiko yang terkendali, sesuai dengan kerangka *risk appetite dan risk tolerance* yang telah ditetapkan. Selain itu, upaya ini juga diarahkan untuk meningkatkan nilai bagi para Pemegang Saham.

Penerapan manajemen risiko di Bank mengacu pada:

1. Undang-Undang No. 7 Tahun 1992 tentang Perbankan sebagaimana telah diubah dengan Undang-Undang No. 10 Tahun 1998;
2. Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2016 tanggal 16 Maret 2016 tentang Penerapan Manajemen Risiko bagi Bank Umum;
3. Surat Edaran Otoritas Jasa Keuangan No. 34/SEOJK.03/2016 tanggal 01 September 2016 tentang Penerapan Manajemen Risiko bagi Bank Umum (beserta lampiran);
4. Peraturan Otoritas Jasa Keuangan No. 65/POJK.03/2016 tanggal 23 Desember 2016 tentang Penerapan Manajemen Risiko bagi Bank Umum Syariah dan Unit Usaha Syariah;
5. Peraturan Otoritas Jasa Keuangan antara lain No.4/POJK.03/2016 tanggal 26 Januari 2016 tentang Penilaian Tingkat Kesehatan Bank Umum;
6. Surat Edaran Otoritas Jasa Keuangan No. 14/SEOJK.03/2017 tanggal 17 Maret 2017 tentang Penilaian Tingkat Kesehatan Bank Umum (beserta lampiran);

Risk management is a set of methodologies and procedures for identifying, measuring, monitoring, and controlling the risks associated with all bank business activities. Bank Sinarmas uses a risk management framework that includes strategies, organizations, policies, and procedures, as well as risk management methodologies, to ensure that all risks faced by the Bank are identified, measured, monitored, controlled, and communicated appropriately. To effectively implement Risk Management, the Bank continuously enhances a culture of risk awareness, including through email campaigns, banners, socialization, training programs, and certification.

### Risk Management Implementation Policy

Bank Sinarmas, as a financial service provider operating in the banking sector, is required to continuously implement risk management procedures. It aims to enable the Bank to maintain a strong financial position and conduct business with controlled risks in accordance with the established framework of risk appetite and risk tolerance. Additionally, these efforts are aimed at increasing value for shareholders.

The implementation of risk management in the Bank refers to:

1. Law No. 7 of 1992 on Banking, as amended by Law No. 10 of 1998;
2. Financial Services Authority Regulation No. 18/POJK.03/2016 dated March 16, 2016, on the Implementation of Risk Management for Commercial Banks;
3. Financial Services Authority Circular Letter No. 34/SEOJK.03/2016, dated September 1, 2016, on the Implementation of Risk Management for Commercial Banks (along with attachments);
4. Financial Services Authority Regulation No. 65/POJK.03/2016, dated December 23, 2016, on the Implementation of Risk Management for Sharia Commercial Banks and Sharia Business Units;
5. Financial Services Authority Regulation No. 4/POJK.03/2016 dated January 26, 2016, on the Assessment of the Soundness Level of Commercial Banks;
6. Financial Services Authority Circular Letter No. 14/SEOJK.03/2017, dated March 17, 2017, on the Rating of Soundness Level for Commercial Banks (along with attachments);

7. Peraturan Otoritas Jasa Keuangan No. 8/POJK.03/2014 tanggal 11 Juni 2014 tentang Penilaian Tingkat Kesehatan Bank Umum Syariah dan Unit Usaha Syariah;
8. Surat Edaran Otoritas Jasa Keuangan No. 10/SEOJK.03/2014 tanggal 11 Juni 2014 tentang Penilaian Tingkat Kesehatan Bank Umum Syariah dan Unit Usaha Syariah (beserta lampiran);
9. Peraturan Otoritas Jasa Keuangan No. 17/POJK.03/2014 tertanggal 18 November 2014 tentang Penerapan Manajemen Risiko Terintegrasi bagi Konglomerasi Keuangan;
10. Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tertanggal 14 September 2023 tentang Penerapan Tata Kelola bagi Bank Umum;
11. Surat Edaran Otoritas Jasa Keuangan No. 14/SEOJK.03/2015 tertanggal 25 Mei 2015 tentang Penerapan Manajemen Risiko Terintegrasi;
12. Surat Edaran Otoritas Jasa Keuangan No. 29/SEOJK.03/2022 tentang Ketahanan dan Keamanan Siber Bagi Bank Umum;
13. Peraturan Otoritas Jasa Keuangan No. 44/POJK.05/2020 tentang Penerapan Manajemen Risiko Bagi Lembaga Jasa Keuangan Non-Bank;
14. Surat Edaran Otoritas Jasa Keuangan No. 8/SEOJK.05/2021 Penerapan Manajemen Risiko Bagi Perusahaan Asuransi, Asuransi Syariah, Reasuransi, dan Reasuransi Syariah;
15. Peraturan Otoritas Jasa Keuangan No. 6/POJK.04/2021 tentang Penerapan Manajemen Risiko Bagi Perusahaan Efek yang Melakukan Kegiatan Usaha Sebagai Penjamin Emisi Efek dan Perantara Pedagang Efek yang Merupakan Anggota Bursa Efek;
16. Surat Edaran Otoritas Jasa Keuangan No. 23/SEOJK.04/2021 tentang Bentuk, Susunan dan Tata Cara Penyampaian Laporan Penilaian Sendiri (*Self-Assessment*) Penerapan Manajemen Risiko Perusahaan Efek yang Melakukan Kegiatan sebagai Penjamin Emisi Efek dan Perantara Pedagang Efek yang Merupakan Anggota Bursa Efek;
17. Peraturan Otoritas Jasa Keuangan No. 4/POJK.05/2021 Penerapan Manajemen Risiko dalam Penggunaan Teknologi Informasi oleh Lembaga Jasa Keuangan Non-Bank;
18. Peraturan Otoritas Jasa Keuangan No. 30 Tahun 2024 tentang Konglomerasi Keuangan dan Perusahaan Induk Konglomerasi Keuangan;
19. Surat Keputusan (SK) No. 095/2023/DIR1-RMG tanggal 28 Desember 2023 tentang Pedoman dan Tata Tertib Kerja Komite Manajemen Risiko PT. Bank Sinarmas Tbk.; dan
20. Surat Keputusan (SK) No. 023/2023/DIRUT-EU tanggal 28 Desember 2023 tentang Pedoman dan Tata Tertib Kerja Komite Manajemen Risiko Terintegrasi Konglomerasi Keuangan Sinar Mas.

7. Financial Services Authority Regulation No. 8/POJK.03/2014, dated June 11, 2014, on the Assessment of Soundness Levels of Sharia Commercial Banks and Sharia Business Units;
8. Financial Services Authority Circular Letter No. 10/SEOJK.03/2014, dated June 11, 2014, on the Assessment of Soundness Levels of Sharia Commercial Banks & Sharia Business Units (along with attachments);
9. Financial Services Authority Regulation No. 17/POJK.03/2014 dated November 18, 2014, on the Implementation of Integrated Risk Management for Financial Conglomeration;
10. Financial Services Authority Regulation No. 17 of 2023 dated September 14, 2023, on the Implementation of Governance for Commercial Banks;
11. Financial Services Authority Circular Letter No. 14/SEOJK.03/2015 dated May 25, 2015, on the Implementation of Integrated Risk Management;
12. Financial Services Authority Circular Letter No. 29/SEOJK.03/2022 on Cyber Resilience and Security for Commercial Banks;
13. Financial Services Authority Regulation No. 44/POJK.05/2020 on the Implementation of Risk Management for Non-Bank Financial Institutions;
14. Financial Services Authority Circular No. 8/SEOJK.05/2021 on the Implementation of Risk Management for Insurance Companies, Sharia Insurance, Reinsurance, and Sharia Reinsurance;
15. Financial Services Authority Regulation No. 6/POJK.04/2021 on the Implementation of Risk Management for Securities Companies Engaged in Business Activities as Underwriters and Securities Broker that are Exchange Members;
16. Financial Services Authority Circular Letter No. 23/SEOJK.04/2021 on the Form, Composition, and Procedures for Submission of Self-Assessment Reports on the Implementation of Risk Management by Securities Companies Engaged in Business Activities as Underwriters and Securities Brokers that are Exchange Members;
17. Financial Services Authority Regulation No. 4/POJK.05/2021 on the Implementation of Risk Management in the Use of Information Technology by Non-Bank Financial Institutions;
18. Financial Services Authority Regulation No. 30 of 2024 on Financial Conglomerates and Financial Conglomerate Holding Companies;
19. Decree (SK) No. 095/2023/DIR1-RMG dated December 28, 2023, on the Charter and Code of Conduct of the Risk Management Committee of PT. Bank Sinarmas Tbk.; and
20. Decree (SK) No. 023/2023/DIRUT-EU dated December 28, 2023, on the Charter and Code of Conduct of the Integrated Risk Management Committee of Sinar Mas Financial Conglomeration.

Bank memiliki kebijakan internal berupa Pedoman Penerapan Manajemen Risiko PT Sinarmas Bank Tbk, bertujuan untuk memastikan risiko-risiko yang dihadapi Bank maupun Lembaga Jasa Keuangan dapat diidentifikasi, diukur, dikendalikan, dan dilaporkan dengan baik. Kebijakan ini telah diunggah pada situs web Bank Sinarmas. Kebijakan tersebut merupakan bagian penting dari upaya merespons dinamika eksternal dan internal perbankan yang berkembang pesat untuk mengidentifikasi, mengukur, memonitor serta mengontrol risiko-risiko yang muncul dari setiap aktivitas Bank, mengelola modal secara komprehensif dan menjaga agar permodalan tetap berada pada tingkat yang kuat, memastikan profitabilitas dan pertumbuhan bisnis yang berkelanjutan serta memaksimalkan nilai tambah bagi Pemegang Saham.

The Bank has an internal policy in the form of PT Sinarmas Bank Tbk's Risk Management Implementation Guidelines, which is designed to ensure that the risks faced by the Bank and Financial Institutions are effectively identified, measured, controlled, and reported. It is an essential part of efforts to respond to the rapid development of external and internal banking dynamics, with the objective of identifying, measuring, monitoring, and controlling risks arising from all Bank activities, managing capital comprehensively, maintaining capital at a high level, ensuring profitability and long-term business growth, and maximizing shareholder value-added.

Bank Sinarmas senantiasa patuh terhadap regulasi yang telah ditetapkan oleh regulator dan mengacu kepada *international best practices* untuk menerapkan manajemen risiko, dan melakukan pelaporan terkait dengan produk dan/atau aktivitas Bank kepada regulator dengan baik dan tepat waktu.

Bank Sinarmas consistently complies with regulations established by regulators and adheres to international best practices in implementing risk management. The Bank also ensures timely and accurate reporting to regulators regarding its products and/or activities.

## Prinsip-prinsip Penerapan Manajemen Risiko

Penerapan Manajemen Risiko Bank secara prinsip mengacu pada pilar-pilar dan ketentuan yang tercantum dalam peraturan otoritas serta peningkatan kualitas penerapan manajemen risiko sejalan dengan perkembangan penerapan kerangka *Basel* yang disesuaikan dengan tujuan, kebijakan usaha, ukuran dan kompleksitas usaha, serta kemampuan Bank dan *best practices*.

## Principles of Risk Management Implementation

The implementation of the Bank's Risk Management in principle refers to the pillars and provisions contained in regulatory authorities as well as the improvement of the quality of risk management implementation in line with developments in the application of the Basel framework, which is adjusted to objectives, business policies, business size and complexity, as well as Bank capabilities and best practices.

Penerapan manajemen risiko dilakukan secara berkesinambungan untuk mencapai pertumbuhan bisnis maupun aktivitas operasional yang sehat dan berkelanjutan serta menjaga agar dapat menghasilkan *return* yang optimal sesuai dengan *risk appetite* dan *risk tolerance* yang telah ditetapkan.

Risk management is implemented on an ongoing basis to ensure soundness and long-term business growth and operational activities, as well as to maintain optimal returns in accordance with the established risk appetite and tolerance.

Dalam menjalankan bisnis, Bank selalu dihadapi risiko yang melekat (inheren) di seluruh kegiatan bisnis dan operasional. Pengelolaan risiko secara keseluruhan dilakukan untuk 12 (dua belas) jenis risiko yang terdiri dari 8 (delapan) jenis risiko yang diukur sesuai dengan kompleksitas bisnis Bank, yaitu Risiko Kredit, Risiko Pasar, Risiko Likuiditas, Risiko Operasional, Risiko Kepatuhan, Risiko Hukum, Risiko Reputasi, dan Risiko Stratejik. Selain itu, terdapat 2 (dua) jenis risiko tambahan yang dinilai pada anak perusahaan yaitu Bank Nano Syariah, diantaranya Risiko Investasi dan Risiko Imbal Hasil serta 2 (dua) jenis risiko tambahan, yaitu Risiko Transaksi Intra grup dan Risiko Asuransi di mana Bank ditunjuk sebagai Entitas Utama dari Konglomerasi Keuangan Sinar Mas. Pengelolaan terhadap seluruh risiko yang dihadapi dilaksanakan dengan mengutamakan prinsip kehati-hatian dan kesesuaian dengan ketentuan regulator.

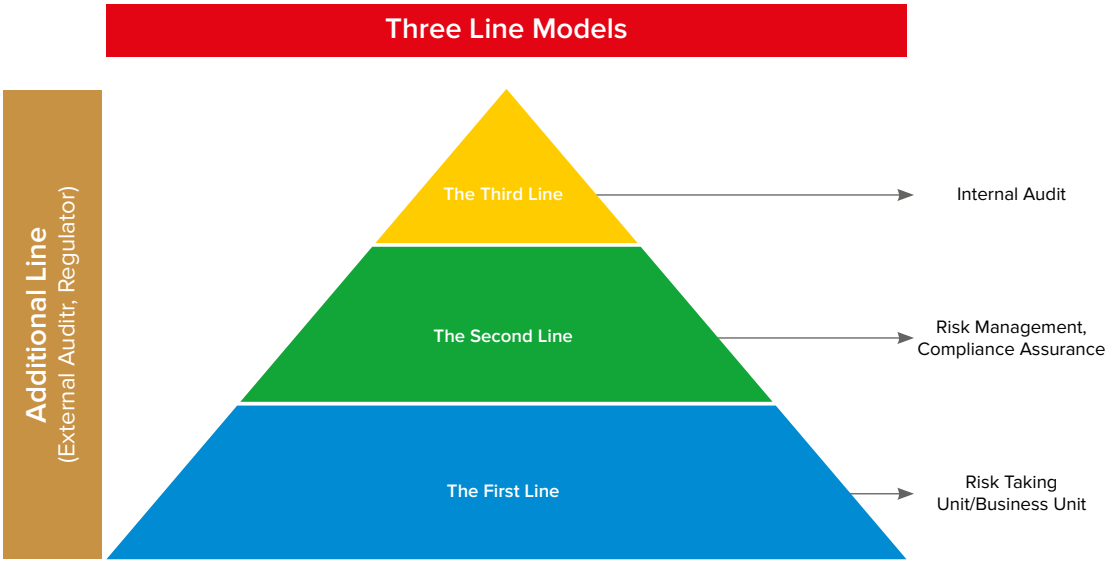
The Bank is always confronted with inherent risks in its business and operational activities. Overall, risk management is carried out for 12 (twelve) types of risks, which are divided into 8 (eight) categories: credit risk, market risk, liquidity risk, operational risk, compliance risk, legal risk, reputation risk, and strategic risk. Furthermore, Bank Nano Syariah assesses two types of additional risk: investment risk and return risk, as well as two types of additional risk: intra-group transaction risk and insurance risk, where the Bank is designated as the Lead Entity of Sinar Mas Financial Conglomeration. All risks are managed by prioritizing caution and regulatory compliance.

## Prinsip *Three Lines Models*

Bank Sinarmas menerapkan manajemen risiko dengan pendekatan yang komprehensif dan tepat melalui penerapan konsep Modal 3 (tiga) Baris (*Three Line Models*). Konsep ini mengorganisasikan fungsi-fungsi yang terlibat dalam manajemen risiko menjadi 3 (tiga) kelompok utama, yaitu pemilik risiko (*risk owner*), pengawas risiko (*risk overseer*), dan penyedia pemastian independen. Di samping itu, Bank juga melibatkan pihak eksternal sebagai lapis tambahan.

## Three Lines Models Principles

Bank Sinarmas implements risk management with a comprehensive and appropriate approach through the application of the Three Lines of Models. This concept organizes the functions involved in risk management into three main groups, namely risk owners, risk overseer, and independent assurance providers. In addition, the Bank also involves external parties as an additional line.




1. Lapis pertama adalah pemilik risiko yang bertanggung jawab mengelola risiko dan menerapkan pengendalian internal pada risiko yang melekat dalam pekerjaan sehari-hari, serta melakukan tindakan korektif dalam mengatasi kelemahan pada proses dan pengendalian.
2. Lapis kedua adalah fungsi atau unit organisasi yang memberikan rekomendasi kepada lapis pertama dalam implementasi kebijakan risiko yang telah ditetapkan, memantau pengendalian lapis pertama, dan memastikan lapis pertama melakukan tanggung jawabnya dengan memadai. Fungsi ini dilakukan oleh Satuan Kerja Manajemen Risiko (SKMR), Satuan Kerja Kepatuhan (SKK), dan Penjaminan Mutu.
3. Lapis ketiga adalah Satuan Kerja Audit Internal yang memastikan secara independen pelaksanaan dari lapis pertama dan lapis kedua terhadap tata kelola, manajemen risiko, dan pengendalian internal.
4. Untuk lapis tambahan, dilakukan oleh auditor eksternal dan regulator yang memberikan tambahan informasi penerapan manajemen risiko Bank kepada para pemangku kepentingan.

1. The first line is the risk owner who is responsible for managing risks and implementing internal controls on the inherent risks in daily operations, as well as taking corrective actions to address weaknesses in processes and controls.
2. The second line is a function or organizational unit providing recommendations to the first line in implementing established risk policies, monitoring the controls of the first line, and ensuring that the first line fulfills its responsibilities adequately. This function is carried out by the Risk Management Work Unit (SKMR), Compliance Work Unit (SKK), and Quality Assurance.
3. The third line is the Internal Audit Work Unit, which independently ensures the implementation of the first and second lines related to governance, risk management, and internal controls.
4. For the additional layer, it is carried out by external auditors and regulators who provide additional information on the implementation of the Bank's risk management to stakeholders.

## Fokus Manajemen Risiko 2024

Sepanjang tahun 2024, perekonomian Indonesia menunjukkan kinerja yang kuat dan stabil. Hal ini tercermin dari pertumbuhan Produk Domestik Bruto (PDB) sebesar 5,1%, sedikit meningkat dibandingkan tahun

## Risk Management Focus in 2024

Throughout 2024, the Indonesian economy showed a robust and stable performance. This was reflected in the Gross Domestic Product (GDP) growth of 5.1%, a slight increase compared to the previous year, which reached 5.0%.

sebelumnya yang mencapai 5,0%. Stabilitas ekonomi dan politik, didukung oleh kebijakan fiskal dan moneter yang efektif, berhasil meningkatkan kepercayaan investor dan mendorong realisasi investasi di berbagai sektor.

Di tengah tantangan global, kinerja ekspor barang dan jasa Indonesia tumbuh sebesar 3,2%, sementara impor meningkat 3,5%. Meskipun demikian, neraca perdagangan tetap terjaga dengan baik. Tingkat inflasi sepanjang tahun 2024 tercatat sebesar 2,8%, berada dalam kisaran target yang ditetapkan oleh pemerintah dan Bank Indonesia. Hal ini menunjukkan kemampuan pemerintah dalam menjaga stabilitas harga dan daya beli masyarakat. (https://fiskal.kemenkeu.go.id/).

Ekonomi domestik yang relatif kuat juga terlihat pada indikator perbankan sebagaimana terlihat pada pertumbuhan kredit (Bank umum) yang masih cukup baik yaitu sebesar 10,52% (yoy) meskipun melambat dari periode yang sama tahun sebelumnya sebesar 10,61% (yoy). Pertumbuhan kredit tersebut turut didorong oleh membaiknya aktivitas usaha dan meningkatnya tingkat keyakinan (optimisme) konsumen. (www.bps.go.id).

Dalam rangka memitigasi potensi risiko bagi Bank dan perbaikan berkelanjutan maka selama tahun 2024 Bank telah melakukan beberapa penyempurnaan dan/atau strategi dalam mengendalikan risiko, antara lain:

1. Bank mengantisipasi Risiko Kredit pasca berakhirnya pandemi Covid-19 atas debitur yang mendapatkan relaksasi mengacu pada Siaran Pers OJK No. SP-41/OJK/GKPB/III/2024 tentang Pengumuman Berakhirnya Stimulus Restrukturisasi Perbankan Dalam Rangka Penanganan Pandemi Covid-19 dengan melakukan monitoring dan meningkatkan pemantauan terhadap debitur yang mendapatkan restrukturisasi.
2. Mengembangkan Budaya Manajemen Risiko, termasuk kesadaran risiko pada seluruh jenjang organisasi, meliputi sosialisasi dan komunikasi yang memadai kepada seluruh jenjang organisasi tentang pentingnya penerapan manajemen risiko yang efektif;
3. Memastikan bahwa Fungsi Manajemen Risiko telah diterapkan secara independen, tercermin antara lain adanya pemisahan fungsi antara SKMR yang melakukan identifikasi, pengukuran, pemantauan, dan pengendalian risiko dengan satuan kerja yang melakukan dan menyelesaikan transaksi;
4. Melalui Komite Manajemen Risiko, Komite Manajemen Risiko Terintegrasi dan Komite Pemantau Risiko, Direksi bersama Komisaris telah melakukan pengawasan aktif atas penerapan manajemen risiko yang efektif dengan melakukan rapat secara berkala membahas agenda dan/atau proposal mengenai manajemen risiko;
5. Telah dilakukan langkah-langkah perbaikan atau tindakan korektif untuk menindaklanjuti permasalahan dan/atau kelemahan dalam kegiatan usaha Bank yang menjadi *concern* audit internal dan/atau eksternal;

Economic and political stability, supported by effective fiscal and monetary policies, succeeded in increasing investor confidence and encouraging investment realization in various sectors.

Amidst global challenges, Indonesia's goods and services export performance increased by 3.2%, while imports increased by 3.5%. Nevertheless, the trade balance was well maintained. The inflation rate throughout 2024 was recorded at 2.8%, within the target range set by the government and Bank Indonesia. It demonstrates the government's ability to maintain price stability and people's purchasing power. (https://fiskal.kemenkeu.go.id/).

The relatively strong domestic economy could also be seen in banking indicators, as seen in the growth of credit (Commercial Banks), which remained quite healthy at 10.52% (yoy) although slower than the same period a year earlier at 10.61% (yoy). This credit growth was driven by improved business activities and increased consumer confidence. (www.bps.go.id).

To mitigate potential risks for the Bank and ensure continuous improvement, during 2024, the Bank implemented several improvements and/or strategies in risk control, among others:

1. The Bank anticipates Credit Risk after the end of the Covid-19 pandemic on debtors who get relaxation, referring to OJK Press Release No. SP-41/OJK/GKPB/III/2024 concerning the Announcement of the End of Banking Restructuring Stimulus in the Context of Handling the Covid-19 Pandemic by monitoring and increasing monitoring of debtors who get restructuring;
2. Developed a Risk Management Culture, including risk awareness at all organizational levels, including adequate outreach and communication throughout the organization regarding the importance of effective risk management implementation;
3. Ensured that the Risk Management Function was applied independently. It was reflected, among other, in the separation of functions between the Risk Management Work unit, which identified, measured, monitored, and controlled risks, and the units that executed and settled transactions;
4. Through the Risk Management Committee, Integrated Risk Management Committee, and Risk Monitoring Committee, the Board of Directors, together with Commissioners, had actively overseen the effective implementation of risk management by holding regular meetings to discuss agendas and/or proposals regarding risk management;
5. Remedial actions or corrective actions have been taken to follow up on issues and/or weaknesses in the Bank's business activities that have become internal and/or external audit concerns;

6. Bank telah menyempurnakan metodologi perhitungan aktiva tertimbang menurut risiko (ATMR) untuk Risiko Kredit, Risiko Operasional, dan Risiko Pasar dengan menggunakan metode pendekatan standar sesuai dengan ketentuan regulator;
7. Bank secara berkala dan senantiasa melakukan kaji ulang dalam rangka penyempurnaan metodologi penilaian, penyusunan parameter penilaian, bobot dan rentang risiko untuk laporan Profil Risiko Bank dan Tingkat Kesehatan Bank baik secara individu (Bank Umum Konvensional) maupun secara konsolidasi dengan Bank Nano Syariah selaku perusahaan anak;
8. *Risk Appetite & Risk Tolerance* telah dikaji ulang dan ditetapkan sesuai dengan strategi dan kerangka Manajemen Risiko termasuk jika terdapat pelampauan limit dan kewenangan untuk persetujuan, baik untuk Bank maupun Terintegrasi Konglomerasi Keuangan Sinar Mas;
9. Telah dilakukan penyusunan, kaji ulang, dan penetapan mekanisme penyempurnaan metodologi penilaian, penyusunan parameter penilaian, bobot dan rentang risiko untuk laporan Profil Risiko Terintegrasi Konglomerasi Keuangan (KK) Sinar Mas;
10. Bank telah melakukan kaji ulang beberapa Kebijakan dan Prosedur antara lain SOP Penilaian Kualitas Aset Bank Versi 1.0, SOP Penyerahan Penagihan Kepada Pihak Ketiga (*Collection Agent*) Kredit *Unsecured* Segmentasi Mikro, *Consumer Loan*, dan Kartu Kredit Versi 2.0, Penyaluran Kredit Simas Dana Tunai, SOP Penyelesaian Kredit Bermasalah versi 3.0, SOP Pengalihan/Penjualan Portofolio Kredit/Piutang (*Cessie*) versi 2.0, Penyaluran Kredit Tanpa Agunan (KTA) *Payroll*, Ketentuan *Negative Database* Bank Sinarmas, Ketentuan Proses Kredit Pada Commercial Loan Origination System, SE Tentang Kredit Pemilikan Mobil, SE Tentang Kredit Pemilikan Rumah (KPR), SOP Supervisi Kredit Segmen *Small & Medium Enterprise* (SME) *Loan*, SOP Hapus Buku Kredit Bermasalah Versi 3.0, SOP *Factoring* (Anjak Piutang) Versi 5.0, SOP Penerbitan Kartu Kredit Bank Sinarmas Versi 1.0, SOP Simas Kredit Usaha Rakyat (KUR) Revisi 5.0, SE Penyaluran Kredit Simas KUK Kredit Usaha Rakyat, SE Fasilitas Kredit Dengan Perluasan Agunan, Ketentuan Metode Analisa Keuangan dalam Pengajuan Kredit *Micro, Small & Medium Enterprise*, SOP Perkreditan Segmen *Corporate* dan *Commercial* Versi 2.0, SE Fasilitas Kredit Berbasis Kontrak Kerja Untuk Pengerjaan Proyek Negara, SE Supply Chain Financing (SCF), SE *Early Warning* Kredit Korporasi & Komersial, SE Segmentasi Fasilitas Kredit Produktif, SK Susunan dan Wewenang Penanganan Kredit Segmen *Corporate* serta *Commercial* Kolektibilitas 1 dan 2 yang Terdampak Penyebaran *Coronavirus Disease* 2019 (COVID-19), SK Susunan dan Wewenang Memutus Untuk Komite Kredit dan Komite Penyelesaian Kredit Bermasalah Kolektibilitas 1 dan 2 *Small & Medium Enterprise Loan*, dan SK Susunan Anggota dan Wewenang Komite

6. The Bank refined the methodology for calculating Risk-Weighted Assets (RWA) for Credit Risk, Operational Risk, and Market Risk using standard approach methods as prescribed by the regulator;
7. The Bank periodically and continuously reviews in order to improve the assessment methodology, preparation of assessment parameters, weights, and risk ranges for the Bank's Risk Profile report and Bank Soundness Level both individually (Conventional Commercial Bank) and in consolidation with Bank Nano Syariah as a subsidiary;
8. Risk Appetite & Risk Tolerance have been reviewed and determined in accordance with the Risk Management strategy and framework, including if there is an exceedance of limits and authority for approval, both for the Bank and Integrated of Sinar Mas Financial Conglomerate;
9. The preparation, review, and establishment of a mechanism for improving the assessment methodology, preparation of assessment parameters, weights, and risk ranges for the Integrated Risk Profile report of Sinar Mas Financial Conglomerate (KK) have been conducted;
10. The Bank reviewed several Policies and Procedures, among others, SOP on Assessment of Bank Assets Quality Version 1.0, SOP on Handover of Collection to Third Party (Collection Agent) of Unsecured Loans for Micro-Segmentation, Consumer Loan, and Credit Card Version 2.0, Simas Dana Cash Loan Disbursement, SOP on Non-performing Loan Settlement version 3.0, SOP on Transfer/Sale of Credit/Debt Portfolio (Cessie) version 2.0, Disbursement of Payroll Unsecured Loan (KTA), Provisions on Negative Database of Bank Sinarmas, Provisions on Credit Process in Commercial Loan Origination System, Circular Letter on Car Ownership Loan, Circular Letter on Home Ownership Loan (KPR), SOP on Credit Supervision of Small & Medium Enterprise (SME) Loan Segment, SOP on Non-performing Loan Write-off Version 3.0, SOP on Factoring Version 5.0, SOP on Issuance of Bank Sinarmas Credit Card Version 1.0, SOP on Simas Kredit Usaha Rakyat (KUR) Revision 5.0, Circular Letter on Credit Distribution of Simas KUK Kredit Usaha Rakyat, Circular Letter on Credit Facility with Collateral Expansion, Provisions on Financial Analysis Methods in Micro, Small & Medium Enterprise Loan Applications, SOP for Corporate and Commercial Segment Credit Version 2.0, Circular Letter of Credit Facilities Based on Labor Contracts for State Projects, Circular Letter on Supply Chain Financing (SCF), Circular Letter on Early Warning of Corporate & Commercial Loans, Circular Letter of Segmentation of Productive Credit Facilities, Decree on the Structure and Authority to Handle Corporate and Commercial Segment Loans with Collectibility 1 and 2 Affected by the Spread of Coronavirus Disease 2019 (COVID-19), Decree on the Composition and Authority to Decide for Credit Committee and Non-Performing

Kredit Bank (KPKB, Kredit Corporate, Komite FI, Kredit Commercial, Credit Card melalui kantor Cabang, Kredit KPR melalui kantor Cabang).

Di samping itu, kaji ulang juga dilakukan secara berkala terhadap beberapa Kebijakan dan Prosedur seperti *Risk Appetite* & *Risk Tolerance* Bank dan *Risk Appetite* & *Risk Tolerance* Terintegrasi bagi Konglomerasi Keuangan Sinar Mas, Kebijakan Penerapan Manajemen Risiko Terintegrasi, Peran SKMR dalam Melaksanakan *Risk Assessment dan Monitoring*, Prosedur *Enterprise Risk Management*, Prosedur Penyusunan Metodologi ATMR, Prosedur Pinjaman Likuiditas Jangka Pendek (PLJP) Bank Indonesia, Prosedur *Contingency Funding Plan* (CFP), Prosedur *Off Market Rate* (OMR), Prosedur Valuasi (*Mark to Market*) dan Verifikasi Hasil Valuasi Portofolio Surat Berharga, Prosedur *Scoring Model*, Petunjuk Pelaksanaan Pemantauan Risiko Pasar dan Risiko Likuiditas, Petunjuk Pelaksanaan Divisi Manajemen Risiko Kredit, Petunjuk Pelaksanaan Sistem Pelaporan dan Monitoring Penyediaan Dana dan BMPK.

11. Bank juga telah melaksanakan *stress testing* Risiko Kredit, Risiko Pasar, Risiko Likuiditas, dan Risiko Operasional secara berkala baik secara individu maupun konsolidasi dengan Bank Nano Syariah sebagai perusahaan anak dalam rangka menguji ketahanan aktivitas bisnis, dampak terhadap *non-performing loan* (NPL), cadangan kerugian penurunan nilai (CKPN), kemampuan likuiditas, pendapatan dan ketahanan permodalan Bank Sinarmas. Selain itu, Bank juga dilakukan perhitungan *Stress Testing* Terintegrasi Konglomerasi Keuangan Sinarmas di mana Bank selaku Entitas Utama.
12. Bank telah menetapkan strategi, parameter, *threshold* serta penyusunan Laporan Rencana Aksi Pemulihan (*Recovery Plan*) Tahun 2024 sebagai salah satu pemenuhan ketentuan regulator serta rencana darurat dalam rangka mengelola kelangsungan aktivitas Bank.
13. Untuk meningkatkan kualitas sumber daya manusia dalam melakukan pengelolaan risiko, Bank telah mengadakan sejumlah *training*, baik yang diadakan secara *inhouse* maupun eksternal, antara lain pemberian materi *risk management*, program sertifikasi manajemen risiko berikut *refreshment*, sosialisasi implementasi *Risk Control Self Assessment* (RCSA) dan *Loss Event Database* (LED), *Training* Penerapan Manajemen Risiko Terintegrasi Bagi Konglomerasi Keuangan Sinar Mas, *Training* melalui platform UDEMY, penyampaian materi *risk campaign* melalui email, dan lain sebagainya.

Dari sisi manajemen risiko kredit, Bank juga telah mengadakan sejumlah *training* seperti Mekanisme Pelaksanaan Penilaian Agunan Pada *Micro Loan*, Analisa Kredit SME *Loan*, Penyaluran Kredit Mikro *Micro Loan* Melalui Sistem Simas Lead dan Pegasystem MSME,

Loan Settlement Committee for Collectibility 1 and 2 Small & Medium Enterprise Loan, and Decree on the Composition of Members and Authority of Bank Credit Committee (KPKB, Corporate Credit, FI Committee, Commercial Credit, Credit Card through Branch offices, Mortgage Credit through Branch offices).

In addition, periodic reviews were also conducted on several Policies and Procedures such as the Bank's Risk Appetite & Risk Tolerance and Integrated Risk Appetite & Risk Tolerance for Sinar Mas Financial Conglomeration, Integrated Risk Management Implementation Policy, SKMR's Role in Conducting Risk Assessment and Monitoring, Enterprise Risk Management Procedure, RWA Methodology Preparation Procedure, Bank Indonesia Short-Term Liquidity Loan (PLJP) Procedure, Contingency Funding Plan (CFP) Procedure, Off Market Rate (OMR) Procedure, Valuation Procedure (Mark to Market) and Verification of Valuation Results of Securities Portfolio, Scoring Model Procedure, Implementation Guidelines for Monitoring Market Risk and Liquidity Risk, Implementation Guidelines for Credit Risk Management Division, Implementation Guidelines for Reporting and Monitoring System of Fund Provision and Legal Lending Limit (LLL);

11. The Bank also regularly conducted stress testing for Credit Risk, Market Risk, Liquidity Risk, and Operational Risk, both individually or consolidated with Bank Nano Syariah as a subsidiary, to test the resilience of business activities, the impact on non-performing loans (NPLs), allowance for impairment losses (CKPN), liquidity capability, revenue and the capital adequacy of Bank Sinarmas. Additionally, the Bank conducted integrated Stress Testing calculations for Sinar Mas Financial Conglomeration, where the Bank acts as the Lead Entity;
12. The Bank determined the strategy, parameters, thresholds, and preparation of the Recovery Plan Report 2024 as one of the fulfillment of regulatory requirements and emergency plans to manage the continuity of the Bank's activities.
13. To improve the quality of human resources in conducting risk management, the Bank conducted a number of trainings, both in-house and external, including the provision of risk management materials, risk management certification program and refreshment, socialization of Risk Control Self Assessment (RCSA) and Loss Event Database (LED) implementation, Training on Integrated Risk Management Implementation for Sinar Mas Financial Conglomeration, Training through UDEMY platform, delivery of risk campaign materials through email, and so forth.

In terms of credit risk management, the Bank also conducted several trainings such as Mechanism of Collateral Assessment Implementation on Micro Loan, SME Loan Credit Analysis, Micro Loan Disbursement through Simas Lead System and Pegasystem MSME,

Kredit *Joint Financing*, Sosialisasi Akad Murabahah dan *Deploy* Restruktur Murabahah, Sosialisasi Ketentuan Baru dan Bedah Kasus KPR, *Refreshment* Proses Analisa Kredit MSME, Penanganan Kredit Bermasalah, *Sharing Session* dan Bedah Kasus *Appraisal*, *Banking Credit Analysis Process (for Bankers)*, *Intro to Commercial Credit Analysis, Credit Risk* and *Lending Banking Credit Analysis Process (for Bankers)*, *Intro to Commercial Credit Analysis, Credit Risk and Lending*, *Workshop Create And Elaborate Excellent Process For MSME Loan*, Pengikatan Kredit dan Agunan, *Refreshment Macroeconomics & Product*, Mekanisme Pelaksanaan Penilaian Agunan Pada *Micro Loan*, Analisis Kredit SME, Penilaian Jaminan, Analisa Sawit, Penerbitan Bank Garansi Melalui Media Swift, *Refreshment* Proses Analisa Kredit MSME, dan Sosialisasi Katalog, serta lain sebagainya.

14. Bank secara terus menerus dan berkesinambungan melakukan pengembangan pada kanal-kanal elektronik yang dimiliki untuk meningkatkan efektivitas pada aktivitas penghimpunan dana dan meningkatkan pendapatan *fee*;
15. Bank melakukan perhitungan dan menyampaikan pelaporan untuk rasio likuiditas yaitu *liquidity coverage ratio* (LCR), *net stable funding ratio* (NSFR), dan *Leverage Ratio* sesuai dengan ketentuan yang ditetapkan secara tepat waktu dan dipublikasikan pada web Bank.;
16. Bank mengukur *Interest Rate Risk in Banking Book* (IRRBB) dimana penerapan dilakukan dengan mengidentifikasi, mengukur, dan memantau serta mengendalikan pergerakan suku bunga yang dapat menyebabkan perubahan pada nilai kini dan penetapan waktu arus kas pada masa mendatang yang mempengaruhi nilai ekonomis dari aset, liabilitas dan transaksi rekening administratif serta menyebabkan perubahan pada pendapatan bunga bersih. Risiko suku bunga dalam buku bank (IRRBB) diukur berdasarkan dampak perubahan suku bunga terhadap perubahan nilai ekonomis dari ekuitas (*economic value of equity*/EVE) dan perubahan pada pendapatan bunga bersih (*net interest income*/NII). Pengelolaan risiko suku bunga dilengkapi dengan analisa sensitivitas secara periodik untuk mengukur dampak dari perubahan suku bunga yang signifikan;
17. Tingkat risiko yang dihadapi Bank telah dipantau secara berkala dan secara keseluruhan proses manajemen risiko dijalankan berdasarkan pada penerapan prinsip GCG dan prinsip kehati-hatian;
18. Seluruh risiko yang material dan dampak yang ditimbulkan oleh risiko telah ditindaklanjuti dan disampaikan pertanggungjawaban kepada Direksi, Dewan Komisaris dan/atau regulator, termasuk langkah-langkah perbaikan yang telah, sedang, dan akan dilakukan; serta
19. Bank senantiasa meningkatkan *risk awareness* dari sisi informasi dan teknologi yang sejalan dengan di terbitkannya Peraturan Otoritas Jasa Keuangan No.29/SEOJK.03/2022 tentang Ketahanan dan Keamanan Siber

Joint Financing Credit, Socialization of Murabahah Agreement and Deployment of Murabahah Restructure, Socialization of New Provisions and Case Review of Mortgage, Refreshment of MSME Credit Analysis Process, Troubled Credit Handling, Sharing Session and Case Review of Appraisal, Banking Credit Analysis Process (for Bankers), Intro to Commercial Credit Analysis, Credit Risk and Lending Banking Credit Analysis Process (for Bankers), Intro to Commercial Credit Analysis, Credit Risk and Lending, Workshop on Create and Elaborate Excellent Process for MSME Loan, Credit and Collateral Binding, Macroeconomics & Product Refreshment, Mechanism of Collateral Assessment Implementation on Micro Loan, SME Credit Analysis, Collateral Assessment, Palm Analysis, Issuance of Bank Guarantee through Swift Media, Refreshment of MSME Credit Analysis Process, and Catalog Socialization, etc.

14. The Bank continuously and sustainably develops its electronic channels to increase the effectiveness of fundraising activities and increase fee income;
15. The Bank calculates and submits reporting for liquidity ratios, namely liquidity coverage ratio (LCR), net stable funding ratio (NSFR), and Leverage Ratio in accordance with the stipulated provisions promptly and published on the Bank's website;
16. The Bank measures Interest Rate Risk in the Banking Book (IRRBB), which is implemented by identifying, measuring, monitoring, and controlling interest rate movements that can cause changes in the present value and timing of future cash flows that affect the economic value of assets, liabilities, and administrative account transactions and cause changes in net interest income. Interest rate risk in the Bank's book (IRRBB) is measured based on the impact of interest rate changes on changes in the economic value of equity (EVE) and changes in net interest income (NII). Interest rate risk management is complemented by periodic sensitivity analysis to measure the impact of significant changes in interest rates;
17. The level of risk faced by the Bank has been monitored regularly, and the overall risk management process is carried out based on the application of GCG principles and prudential principles;
18. All material risks and impacts caused by the risks have been followed up and submitted to the Board of Directors, Board of Commissioners, and/or regulators, including corrective measures that have been, are being, and will be carried out; and
19. The Bank continues to increase risk awareness in terms of information and technology in line with the issuance of Financial Services Authority Regulation No.29/SEOJK.03/2022 concerning Cyber Resilience and

Bagi Bank Umum yaitu dengan melakukan pengukuran mandiri atau penilaian sendiri (*self-assessment*) yang mengacu kepada parameter, *threshold* dan bobot risiko yang telah di tetapkan serta disetujui oleh Komite Manajemen Risiko dan Komite Pemantau Risiko.

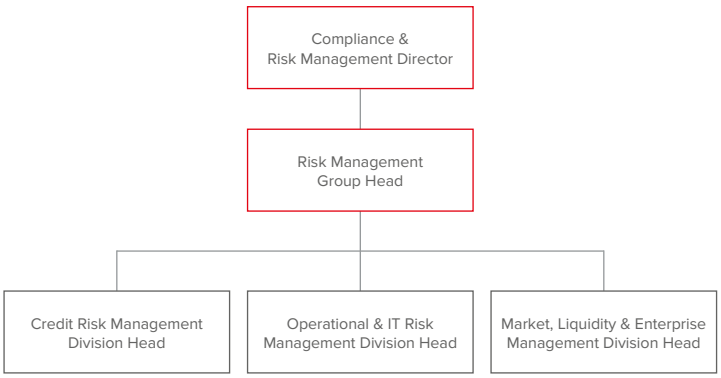
Security for Commercial Banks, namely by conducting self-measurement or self-assessment, which refers to the risk parameters, thresholds, and weights that have been determined and approved by the Risk Management Committee and Risk Monitoring Committee.

## Struktur Organisasi Manajemen Risiko Bank Sinarmas

Bank Sinarmas telah memiliki struktur organisasi yang memadai untuk mendukung penerapan manajemen risiko. Organ dalam struktur tersebut diuraikan sebagai berikut.

## Risk Management Organizational Structure of Bank Sinarmas

Bank Sinarmas has a well-established organizational structure to support the implementation of risk management. The organs within the structure are outlined as follows.




## Organ Struktur Manajemen Risiko Bank Sinarmas

**Structure Organ of the Integrated Risk Management of Sinarmas**

| Organ | Wewenang dan Tanggung Jawab<br>Authority and Responsibility | |
|---|---|---|
| **Satuan Kerja Manajemen Risiko (SKMR)**<br>**Risk Management Work Unit (SKMR)** | | |
| SKMR merupakan satuan kerja yang menjalankan fungsi pengelolaan penerapan manajemen risiko pada aktivitas operasional Bank. Organ ini merupakan bagian dari Direktorat Kepatuhan dan Manajemen Risiko yang memiliki 3, Divisi yaitu:<br>• *Credit Risk Management Division;*<br>• *Operational & IT Risk Management Division;* dan<br>• *Market, Liquidity & Enterprise Risk Management Division.* | • Melakukan pemantauan pelaksanaan strategi manajemen risiko yang telah disetujui oleh direksi;<br>• Melakukan pemantauan posisi risiko secara keseluruhan, per jenis risiko, dan per jenis aktivitas fungsional serta melakukan *stress testing*;<br>• Melakukan kaji ulang secara berkala terhadap proses manajemen risiko;<br>• Melakukan pengkajian usulan aktivitas dan/atau produk baru serta usulan perubahan sistem dan prosedur;<br>• Melakukan evaluasi terhadap akurasi model dan validitas data yang digunakan untuk mengukur risiko;<br>• Memberikan rekomendasi kepada satuan kerja operasional (*risk taking unit*) dan/atau kepada Komite Manajemen Risiko, sesuai kewenangan yang dimiliki; dan<br>• Menyusun dan menyampaikan laporan profil risiko kepada direktur utama atau direktur yang ditugaskan secara khusus serta Komite Manajemen Risiko secara berkala. | • Monitoring the implementation of risk management strategies approved by the Board of Directors;<br>• Monitoring the overall risk position, per type of risk, and type of functional activity and conducting stress testing;<br>• Conducting periodic reviews of the risk management process;<br>• Reviewing proposals for new activities and/or products as well as proposals for changes to systems and procedures;<br>• Evaluating the accuracy of the model and the validity of the data used to measure risk;<br>• Providing recommendations to operational work units (risk-taking units) and/or to the Risk Management Committee, according to their authority; and<br>• Preparing and submitting risk profile reports to the President Director or specially assigned Director and the Risk Management Committee regularly. |
| The Risk Management Work Unit is a work unit carrying out the function of managing the implementation of risk management in the operational activities of the bank. This unit is part of the Compliance and Risk Management Directorate, which consists of three divisions, namely:<br>• Credit Risk Management Division;<br>• Operational & IT Risk Management Division; and<br>• Market, Liquidity & Enterprise Risk Management Division. | | |

| Organ | Wewenang dan Tanggung Jawab<br>Authority and Responsibility |
|---|---|
| **Komite Manajemen Risiko**<br>Risk Management Committee | |
| Komite Manajemen Risiko merupakan komite yang dibentuk dengan tujuan menjalankan fungsi manajemen risiko pada level Direksi dan pejabat eksekutif untuk mengarahkan serta menyetujui penyusunan strategi, kebijakan, prosedur, limit dan metodologi yang digunakan untuk memitigasi risiko yang mungkin di hadapi.<br>The Risk Management Committee is a committee formed aiming to carry out risk management functions at the Board of Directors and executive officer levels to direct and approve the formulation of strategies, policies, procedures, limits, and methodologies used to mitigate potential risks. | Komite Manajemen Risiko memiliki tugas dan tanggung jawab memberikan rekomendasi kepada Direktur Utama, paling sedikit mencakup:<br>• Penyusunan kebijakan, strategi, dan pedoman penerapan manajemen risiko serta perubahannya, termasuk strategi manajemen risiko, tingkat risiko yang diambil dan toleransi risiko, kerangka manajemen risiko serta rencana kontinjensi untuk mengantisipasi terjadinya kondisi tidak normal;<br>• Perbaikan atau penyempurnaan pelaksanaan manajemen risiko secara berkala maupun bersifat insidental sebagai akibat dari suatu perubahan kondisi eksternal dan internal Bank yang mempengaruhi kecukupan permodalan, Profil Risiko Bank, dan tidak efektifnya penerapan manajemen risiko berdasarkan hasil evaluasi;<br>• Penetapan kebijakan dan/atau keputusan bisnis yang menyimpang dari prosedur normal, seperti pelampauan ekspansi usaha yang signifikan dibandingkan dengan rencana bisnis Bank yang telah ditetapkan sebelumnya atau pengambilan posisi/eksposur risiko yang melampaui limit yang telah ditetapkan yang dapat disampaikan melalui rapat Komite Manajemen Risiko atau dilakukan melalui sirkulasi memorandum internal;<br>• Menyetujui laporan Tingkat Kesehatan Bank yang meliputi Laporan Profil Risiko Bank mencakup 8 (delapan) jenis risiko, yaitu Risiko Kredit, Risiko Pasar, Risiko Likuiditas, Risiko Stratejik, Risiko Operasional, termasuk Risiko Siber sebagai indikator tambahan, Risiko Kepatuhan, Risiko Reputasi dan Risiko Hukum serta terdapat tambahan 2 (dua) risiko terkait syariah, yaitu Risiko Investasi dan Risiko Imbal Hasil, Laporan Tata Kelola Bank, Laporan Rentabilitas Bank, dan Laporan Permodalan Bank yang wajib disampaikan secara berkala kepada regulator yaitu triwulan dan semester yang disampaikan pada rapat dan direkomendasikan oleh Komite Manajemen Risiko;<br>• Menyetujui laporan lain yang wajib dilaporkan kepada regulator secara berkala, seperti Laporan *Internal Capital Adequacy Assessment Process* (ICAAP), Laporan *Stress Test*, dan lain-lain yang perlu disampaikan dan disetujui melalui rapat Komite Manajemen Risiko atau melalui sirkulasi memorandum internal;<br>• Menjalankan fungsi yang lain seperti yang diarahkan oleh Direktur Utama dan/atau Komite Pemantau Risiko; dan<br>• Menyetujui rencana kerja yang disusun dan disampaikan oleh sekretaris Komite Manajemen Risiko.<br><br>**Keanggotaan Komite Manajemen Risiko**<br>Keanggotaan Komite Manajemen Risiko sesuai dengan Pedoman dan Tata Tertib Kerja Komite Manajemen Risiko, sebagai berikut :<br>1. Ketua (merangkap anggota tetap) yaitu Direktur yang membawahi Kepatuhan dan Manajemen Risiko<br>2. Sekretaris (merangkap anggota tetap) yaitu Risk Management Group Head<br>3. Anggota Tetap yaitu Seluruh Direktur<br>4. Anggota Tidak Tetap yaitu terdiri dari:<br>• Bidang *Audit Internal*<br>• Bidang *Compliance*<br>• Bidang *Credit Management* (MSME & Consumer)<br>• Bidang *Loan Recovery*<br>• Bidang *Legal*<br>• *Bidang Anti Fraud Management*<br>• *Bidang Deposit Investment Product Development* | The Risk Management Committee has duties and responsibilities to provide recommendations to the President Director, at least including:<br>• Formulation of policies, strategies, and guidelines for the implementation of risk management and any changes thereto, including risk management strategies, risk appetite, risk tolerance levels, risk management frameworks, and contingency plans to anticipate abnormal conditions;<br>• Improvement or refinement of risk management implementation regularly or incidentally as a result of changes in external and internal conditions of the Bank that affect capital adequacy, the Bank›s risk profile, and the ineffectiveness of risk management implementation based on evaluation results;<br>• Determination of policies and/or business decisions that deviate from normal procedures, such as significant business expansion beyond the Bank›s previously established business plans or taking positions/exposures that exceed the predefined limits, which can be conveyed through Risk Management Committee meetings or internal memorandum circulation;<br>• Approval of the Bank›s Soundness Level Report, which includes the Bank›s Risk Profile Report covering 8 (eight) types of risks such as Credit Risk, Market Risk, Liquidity Risk, Strategic Risk, Operational Risk, including Cyber Risk as an additional indicator, Compliance Risk, Reputation Risk, and Legal Risk, as well as two additional Sharia-related risks, namely Investment Risk and Yield Risk, Governance Report, Profitability Report, and Capital Report, which must be submitted periodically to regulators on a quarterly and semi-annual basis and approved through Risk Management Committee meetings;<br>• Approval of other reports that must be submitted to regulators periodically, such as the Internal Capital Adequacy Assessment Process (ICAAP) Report, Stress Test Report, and others that need to be submitted and approved through Risk Management Committee meetings or internal memorandum circulation;<br>• Performing other functions as directed by the President Director and/or the Risk Monitoring Committee; and<br>• Approving the work plan prepared and submitted by the secretary of the Risk Management Committee.<br><br>**Risk Management Committee Membership**<br>The Risk Management Committee›s membership is in line with the Charter and Working Procedures of the Risk Management Committee, as follows:<br>1. Chairperson (also a permanent member), namely the Director in Charge of Compliance and Risk Management<br>2. Secretary (also a permanent member), namely the Risk Management Group Head<br>3. Permanent Members, consisting of all Directors<br>4. Non-Permanent Members, consisting of:<br>• Internal Audit Department<br>• Compliance Department<br>• Credit Management Department (MSME & Consumer)<br>• Loan Recovery Department<br>• Legal Department<br>• Anti-Fraud Management Department<br>• Deposit Investment Product Development Department |

| Organ | Wewenang dan Tanggung Jawab<br>Authority and Responsibility |
|---|---|

- *Bidang Customer Segmentation*
- Bidang *Micro, Small & Medium Enterprise Business*

- Bidang *Corporate & Commercial Banking*
- Bidang *Corporate Banking Business Solution*
- Bidang *Treasury & Financial Institution*
- Bidang *Payment Transaction & Consumer Loan*

- Bidang *Credit Card*
- Bidang *Securities Services*
- Bidang IT
- Bidang *Business Intelligence*
- Bidang *Artificial Intelligence & Decision Science*

- Bidang *Credit Administration & Control*
- Bidang *Branch Network, Business Continuation & General Services*
- Bidang *Procurement*
- Bidang *Finance & Performance Management*
- Bidang *Operations*
- Bidang *Human Capital Management*
- Bidang *Digital Marketing*
- Bidang *Sales and Distribution*

**Keputusan Komite Manajemen Risiko**

a. Keputusan Rapat Komite Manajemen Risiko dilakukan dengan tujuan untuk mencapai musyawarah dan mufakat, pengambilan keputusan dilakukan berdasarkan pemungutan suara dan dinyatakan sah apabila disetujui oleh lebih dari 50% dari anggota tetap yang hadir. Selain dilakukan rapat, keputusan dapat dilakukan melalui sirkulasi dan/ atau email, dan dapat dinyatakan sah/quorum apabila disetujui oleh lebih dari 50% jumlah anggota termasuk Ketua komite manajemen risiko dan/atau Sekretaris Komite;
b. Dalam hal pengambilan hak suara berimbang maka ketua komite berhak untuk memberikan hak suara kedua. Dalam hal Ketua Komite berhalangan maka Direktur Utama berhak untuk memberikan hak suara kedua. Rekomendasi yang diberikan oleh Komite Manajemen Risiko harus mencerminkan suatu kesepakatan diantara para anggota Komite;
c. Keputusan Direksi yang diambil sesuai dengan pedoman dan tata tertib kerja mengikat dan menjadi tanggung jawab seluruh anggota Direksi;

**Realisasi Rencana Kerja Komite Manajemen Risiko 2024**

1. Penyusunan dan perbaikan Kebijakan Manajemen Risiko (strategi dan kerangka manajemen risiko), meliputi :
   1) Menyetujui Kebijakan Manajemen Risiko dan wajib mendapatkan persetujuan Komisaris.
   2) Mengkomunikasikan atau sosialisasi Kebijakan Manajemen Risiko secara efektif kepada seluruh jenjang organisasi agar penerapan sesuai dengan yang telah ditetapkan.
   3) Kaji ulang Kebijakan Manajemen Risiko paling sedikit 1 (satu) kali dalam setahun atau sewaktu-waktu terdapat perubahan faktor-faktor yang mempengaruhi kegiatan usaha secara signifikan sebagai akibat dari suatu perubahan kondisi eksternal dan internal yang berdampak pada kecukupan permodalan, profil risiko, dan tidak efektifnya penerapan Manajemen Risiko.

- Customer Segmentation Department
- Micro, Small & Medium Enterprise Business Department
- Corporate & Commercial Banking Department
- Corporate Banking Business Solution Department
- Treasury & Financial Institution Department
- Payment Transaction & Consumer Loan Department
- Credit Card Department
- Securities Services Department
- IT Department
- Business Intelligence Department
- Artificial Intelligence & Decision Science Department
- Credit Administration & Control Department
- Branch Network, Business Continuation & General Services Department
- Procurement Department
- Finance & Performance Management Department
- Operations Department
- Human Capital Management Department
- Digital Marketing Department
- Sales and Distribution Department

**Risk Management Committee Decision**

a. Decisions of the Risk Management Committee Meetings are conducted to achieve deliberation and consensus. Decision-making is based on voting and is declared valid if approved by more than 50% of the permanent members present. In addition to meetings, decisions can be made through circulation and/or email and can be declared valid/quorum if approved by more than 50% of the number of members, including the Chairman of the risk management committee and/ or Secretary of the Committee;
b. In the event of a tie vote, the chairman of the committee shall have the right to cast the second vote. If the Chairman of the Committee is absent, the President Director is entitled to cast the second vote. Recommendations provided by the Risk Management Committee must reflect an agreement among the Committee members;
c. Decisions of the Board of Directors taken in accordance with the guidelines and work rules are binding and the responsibility of all members of the Board of Directors;

**Implementation of Risk Management Committee Work Plan in 2024**

1. Preparation and improvement of Risk Management Policy (risk management strategy and framework), including:
   1) Approved the Risk Management Policy and must obtain the Commissioner›s approval.
   2) Communicated or socialized the Risk Management Policy effectively to all levels of the organization so that the implementation is in accordance with what has been determined.
   3) Reviewed the Risk Management Policy at least once a year or at any time there are changes in factors that significantly affect business activities as a result of changes in external and internal conditions that have an impact on capital adequacy, risk profile, and ineffective implementation of Risk Management.

| Organ | Wewenang dan Tanggung Jawab<br>Authority and Responsibility | |
|---|---|---|
| | 4) Mengevaluasi kesesuaian antara kebijakan Manajemen Risiko dengan penerapan dan rencana kontijensi paling sedikit 1 (satu) kali dalam setahun untuk mengantisipasi terjadinya kondisi tidak normal dan guna perbaikan atau penyempurnaan kebijakan manajemen risiko. | 4) Evaluated the suitability of Risk Management policies with implementation and contingency plans at least once a year to anticipate the occurrence of abnormal conditions and to improve or refine risk management policies. |
| | 2. Memastikan manajemen risiko telah diterapkan sesuai dengan karakteristik dan kompleksitas usaha Bank dan ketentuan regulator, meliputi: | 2. Ensuring risk management has been implemented in accordance with the characteristics and complexity of the Bank›s business and regulatory requirements, including: |
| | 1) Menyetujui Pedoman atau Rencana Kerja Komite Manajemen Risiko disesuaikan dengan karakteristik, kompleksitas usaha, dan risiko yang melekat pada bisnis bank. | 1) Approved the Guidelines or Work Plan of the Risk Management Committee in accordance with the characteristics, business complexity, and risks inherent in the Bank›s business. |
| | 2) Menyetujui Laporan *Internal Capital Adequacy Assessment Process* (ICAAP) dan memastikan kecukupan permodalan Bank dalam mengantisipasi potensi risiko yang akan terjadi, memiliki modal yang kuat dalam mendukung strategi bisnis dan menjadi *buffer* saat terjadi krisis. (termasuk konsolidasi dengan Bank Nano Syariah selaku anak perusahaan). | 2) Approved the Internal Capital Adequacy Assessment Process (ICAAP) Report and ensured the adequacy of the Bank›s capital in anticipating potential risks that will occur, having robust capital in supporting business strategies, and becoming a buffer in the event of a crisis. (including consolidation with Bank Nano Syariah as a subsidiary). |
| | 3) Memantau risiko inheren yang signifikan yang mempengaruhi Profil Risiko dan Tingkat Kesehatan. | 3) Monitored significant inherent risks that affect the Risk Profile and Soundness Level. |
| | 4) Menetapkan dan Menyetujui *Risk Appetite* dan *Risk Tolerance* (RART) serta melakukan kaji ulang minimal 1 (satu) kali dalam setahun. | 4) Determined and Approved Risk Appetite and Risk Tolerance (RART) and conducted a review at least once a year. |
| | 5) Melakukan evaluasi dan rekomendasi atas pelampauan ekspansi usaha yang signifikan dibandingkan dengan rencana bisnis yang telah ditetapkan atau pengambilan posisi atau eksposur Risiko yang melampaui limit RART yang telah ditetapkan. | 5) Evaluated and recommended significant business expansion compared to the established business plan or taking positions or risk exposures that exceed the established RART limits. |
| | 6) Memantau kecukupan proses identifikasi, pengukuran, pemantauan, dan pengendalian risiko, serta sistem informasi manajemen risiko. | 6) Monitored the adequacy of risk identification, measurement, monitoring, and control processes, as well as risk management information systems. |
| | 7) Memastikan kecukupan SDM (kompetensi dan kualitas) dalam mengelola dan mengendalikan risiko serta memastikan bahwa fungsi manajemen risiko telah diterapkan secara independen tercermin antara lain adanya pemisahan fungsi antara *Risk Management Group* dengan satuan kerja bisnis yang melakukan dan menyelesaikan transaksi serta Internal Audit. | 7) Ensured the adequacy of HR (competence and quality) in managing and controlling risks and ensured that the risk management function has been independently implemented as reflected, among others, by the separation of functions between the Risk Management Group and business units that conduct and complete transactions and Internal Audit. |
| | 8) Menyetujui, mengevaluasi dan memantau skenario serta hasil *Stress Testing* yang dilakukan. | 8) Approved, evaluated, and monitored scenarios and results of Stress Testing conducted. |
| | 9) Melaksanakan Rapat KMR minimal 10 kali dalam 1 (satu) tahun. | 9) Carried out the Risk Management Committee Meeting at least 10 times a year. |
| | 3. Memahami dengan baik risiko yang melekat pada bisnis : | 3. Understanding well the risks inherent in the business: |
| | 1) Menyetujui dan memastikan telah melakukan *Self Assessment* Laporan Profil Risiko dan Laporan Tingkat Kesehatan dengan struktur, skala, kompleksitas, dan tingkat risiko sesuai ketentuan yang ditetapkan. | 1) Approved and ensured that the Bank has conducted Self Assessment of the Risk Profile Report and Health Level Report with structure, scale, complexity, and risk level in accordance with the stipulated provisions. |
| | 2) Menyetujui dan memastikan Bank telah melakukan kaji ulang parameter/rentang risiko/bobot risiko dari Profil Risiko dan Tingkat Kesehatan secara berkala dengan mengacu pada ketentuan internal dan Regulator mengenai Penerapan Manajemen Risiko. | 2) Approved and ensured that the Bank has reviewed the parameters/risk ranges/risk weights of the Risk Profile and Soundness Level regularly with reference to internal and regulatory provisions regarding the Implementation of Risk Management. |
| | 3) Memantau dan memastikan seluruh risiko yang material melalui penerapan Manajemen Risiko. | 3) Monitored and ensured all material risks through the implementation of Risk Management. |
| | 4) Melakukan pengawasan dan/atau pemantauan terkait Ketentuan dan uji coba *Contigency Funding Plan* dan Pinjaman Likuiditas Jangka Pendek (PLJP) Bank Indonesia. | 4) Supervised and/or monitored the Provisions and trials of the Contingency Funding Plan and Short-Term Liquidity Loan (PLJP) of Bank Indonesia. |

| Organ | Wewenang dan Tanggung Jawab<br>Authority and Responsibility |
|---|---|

5) Menyetujui Laporan Profil Risiko secara komposit per jenis risiko dan Laporan Tingkat Kesehatan secara keseluruhan dan per faktor penilaian, serta dapat menyesuaikan tingkat risiko (lebih tinggi atau lebih rendah dari tingkat risiko dalam rangka menggambarkan tingkat risiko yang sebenarnya (termasuk konsolidasi dengan Bank Nano Syariah sebagai anak perusahaan).

4. Mengembangkan budaya risiko sebagai bagian dari penerapan manajemen risiko :
   1) Memantau sertifikasi dan pelatihan untuk seluruh jenjang organisasi mengenai penerapan manajemen risiko.
   2) Melakukan komunikasi atau *Focus Group Discussion* yang memadai kepada seluruh jenjang organisasi tentang pentingnya pengendalian intern yang efektif.

**Rapat Komite Manajemen Risiko**
Komite Manajemen Risiko mengadakan rapat secara berkala minimal 10 (sepuluh) kali dalam setahun dan rapat Adhoc di luar rapat berkala. Rapat komite dihadiri oleh seluruh anggota tetap dan anggota tidak tetap. Selama tahun 2024, Komite Manajemen Risiko telah menyelengarakan rapat secara berkala sebanyak 11 (sebelas) kali rapat dan seluruh hasil rapat yang dilaksanakan telah mencapai keputusan bersama secara musyawarah dan mufakat serta dinyatakan sah dan seluruh hasil rapat Komite Manajemen Risiko dituangkan didalam risalah rapat dan telah didokumentasikan dengan baik.

5) Approved the Risk Profile Report on a composite basis per risk type and the Soundness Report as a whole and per assessment factor, and may adjust the risk level (higher or lower than the risk level to reflect the actual risk level (including consolidation with Bank Nano Syariah as a subsidiary).

4. Developing a risk culture as part of risk management implementation:
   1) Monitored certification and training for all levels of the organization on the implementation of risk management.
   2) Conducted adequate communication or Focus Group Discussions at all levels of the organization on the importance of effective internal control.

**Risk Management Committee Meeting**
The Risk Management Committee holds regular meetings at least 10 (ten) times a year and Adhoc meetings outside the regular meetings. Committee meetings are attended by all permanent and non-permanent members.
During 2024, the Risk Management Committee held 11 (eleven) regular meetings and all the results of the meetings held have reached a joint decision by deliberation and consensus and are declared valid and all the results of the Risk Management Committee meetings are stated in the minutes of meetings and have been well documented.

## Komite Pemantau Risiko
## Risk Monitoring Committee

Komite Pemantau Risiko merupakan komite yang dibentuk untuk menjalankan fungsi pengawasan manajemen risiko pada tingkat Komisaris Bank dan Komisaris Pihak Independen yang bertanggung Jawab kepada Dewan Komisaris dalam hal pengawasan dan pemantauan penerapan manajemen risiko yang efektif.
The Risk Monitoring Committee is a committee formed in order to carry out risk management supervisory functions at the Board of Commissioners and Independent Commissioners levels responsible to the Board of Commissioners in term of supervision and monitoring of effective risk management implementation.

Tugas dan tanggung jawab Komite Pemantau Risiko:
- Evaluasi tentang kesesuaian antara kebijakan manajemen risiko dengan pelaksanaan kebijakan Bank;
- Pemantauan dan evaluasi pelaksanaan tugas Komite Manajemen Risiko dan Satuan Kerja Manajemen Risiko guna memberikan rekomendasi kepada Dewan Komisaris.

**Keanggotaan Komite Pemantau Risiko**
Keanggotaan Komite Pemantau Risiko PT. Bank Sinarmas Tbk. terdiri dari:
1. 1 (satu) orang Komisaris Independen;
2. 1 (satu) orang Pihak Independen yang memiliki keahlian bidang manajemen risiko; dan
3. 1 (satu) orang dari Pihak Independen yang memiliki keahlian :
   1) Bidang keuangan, bagi Bank yang melaksanakan kegiatan usaha secara konvensional; atau
   2) Bidang perbankan syariah, bagi Bank yang melaksanakan kegiatan usaha secara syariah dan Bank yang melaksanakan kegiatan usaha secara konvensional yang memiliki UUS.

**Keputusan Komite Pemantau Risiko**
1. Keputusan rapat komite terlebih dahulu dilakukan berdasarkan musyawarah untuk mufakat.
2. Dalam hal tidak terjadi musyawarah untuk mufakat, pengambilan keputusan dilakukan berdasarkan suara terbanyak.
3. Hasil rapat komite wajib dituangkan dalam risalah rapat dan didokumentasikan sesuai dengan ketentuan peraturan perundang-undangan.
4. Perbedaan pendapat yang terjadi dalam rapat komite wajib dicantumkan secara jelas dalam risalah rapat beserta alasan perbedaan pendapat.

**Rapat Komite Pemantau Risiko**
Komite Pemantau Risiko mengadakan rapat secara berkala minimal 12 (dua belas) kali dalam setahun yang dihadiri oleh seluruh anggota. Selama Tahun 2024, Komite Pemantau Risiko telah menyelengarakan rapat secara berkala sebanyak 12 (dua belas) kali rapat.

Duties and responsibilities of the Risk Monitoring Commitee:
- Evaluation of the conformity between risk management policies and the implementation of the Bank›s policies;
- Monitoring and evaluating the implementation of duties of the Risk Management Committee and the Risk Management Work Unit to provide recommendations to the Board of Commissioners.

**Risk Monitoring Committee Membership**
The Membership of the Risk Monitoring Committee of PT. Bank Sinarmas Tbk., consists of:
1. 1 (one) Independent Commissioner;
2. 1 (one) Independent Party who has expertise in risk management; and
3. 1 (one) person from the Independent Party who has expertise in:
   1) Financial sector, for Banks conducting business conventionally; or
   2) Sharia banking sector, for Banks conducting sharia business activities and Banks conducting conventional business activities that have Sharia Business Unit (UUS).

**Risk Monitoring Committee Decision**
1. Decisions at committee meetings are first made based on deliberation for consensus.
2. If there is no deliberation for consensus, the decision is made based on a majority vote.
3. The results of committee meetings shall be outlined in the minutes of meetings and documented in accordance with the provisions of laws and regulations.
4. Differences of opinion that occur in committee meetings must be clearly stated in the minutes of the meeting, along with the reasons for the differences of opinion.

**Risk Monitoring Committee**
The Risk Monitoring Committee holds regular meetings at least 12 (twelve) times a year attended by all members. During 2024, the Risk Monitoring Committee held 12 (twelve) regular meetings.

| Organ | Wewenang dan Tanggung Jawab<br>Authority and Responsibility | |
|---|---|---|
| | **Realisasi Rencana Kerja Komite Pemantau Risiko 2024.**<br><br>1. Memberikan rekomendasi kepada Dewan Komisaris dalam rangka:<br>1) Meningkatkan efektivitas pelaksanaan tugas dan tanggung jawab di bidang manajemen risiko, dan<br><br>2) Melakukan pemantauan dan evaluasi pelaksanaan tugas Komite Manajemen Risiko dan Satuan Kerja Manajemen Risiko, diantaranya:<br>a. Mengevaluasi kesesuaian antara kebijakan Manajemen Risiko dengan pelaksanaan kebijakan Bank disesuaikan dengan tujuan, kebijakan usaha, ukuran dan kompleksitas usaha serta kemampuan Bank, antara lain melalui *monitoring* pelaksanaan *risk appetite* & *risk tolerance* Bank.<br><br>b. Mengevaluasi dan memantau strategi agar selalu mampu mempertahankan peringkat Tingkat Kesehatan Bank (Profil Risiko, *Good Corporate Governance*, Rentabilitas dan Permodalan) pada peringkat 2 (dua) atau SEHAT – Individu (Bank Sinarmas Konvensional) & Konsolidasi dengan Bank Nano Syariah.<br>c. Memantau posisi/eksposur risiko secara keseluruhan, maupun per risiko termasuk pemantauan kepatuhan terhadap toleransi risiko dan limit yang ditetapkan (*risk appetite* & *risk tolerance*) – Individu (Bank Sinarmas Konvensional) & Konsolidasi dengan Bank Nano Syariah.<br><br>d. Melakukan pengawasan terhadap proses mitigasi risiko (*action plan*) secara aktif yang dilakukan oleh *risk taking unit*, sistem pengendalian internal, serta pengawasan terhadap pengembangan budaya sadar risiko pada seluruh unit kerja Bank.<br>e. Monitoring dan/atau mendapatkan informasi mengenai skenario dan hasil *Stress Testing* Bank 2024.<br>f. Melakukan pengawasan dan/atau pemantauan terkait Ketentuan dan Uji Coba *Contigency Funding Plan* dan Pinjaman Likuiditas Jangka Pendek (PLJP) Bank Indonesia).<br>2. Rencana Bisnis Bank.<br>Mengevaluasi dan memantau realisasi Rencana Bisnis Bank 2024 – 2026.<br>3. Strategi Anti *Fraud.*<br>Pemantauan dan evaluasi penerapan strategi anti *fraud*. | **Implementation of Risk Monitoring Committee Work Plan in 2024**<br>1. Provided recommendations to the Board of Commissioners in the context of:<br>1) Enhancing the effectiveness of the implementation of duties and responsibilities in the field of risk management, and<br>2) Monitoring and evaluating the implementation of duties of the Risk Management Committee and Risk Management Work Unit, among others:<br>a. Evaluated the suitability between the Risk Management policy and the implementation of the Bank›s policy in accordance with the objectives, business policy, size and complexity of the business, as well as the Bank›s capability, among others, through monitoring the implementation of the Bank›s risk appetite & risk tolerance.<br>b. Evaluated and monitored the strategy to always be able to maintain the Bank›s Soundness Level rating (Risk Profile, Good Corporate Governance, Profitability, and Capital) at rating 2 (two) or HEALTHY - Individual (Bank Sinarmas Conventional) & Consolidated with Bank Nano Syariah.<br>c. Monitored the overall risk position/exposure, as well as per risk, including monitoring compliance with the risk appetite and risk tolerance - Individual (Conventional Bank Sinarmas) & Consolidated with Bank Nano Syariah.<br><br>d. Supervised the risk mitigation process (action plan) actively carried out by the risk-taking unit, and internal control system and supervised the development of a risk-aware culture in all work units of the Bank.<br><br>e. Monitored and/or obtained information regarding the scenario and results of the Bank›s Stress Testing 2024.<br>f. Supervised and/or monitored the provisions and trials of the Contingency Funding Plan and the Bank Indonesia Short-Term Liquidity Loan (PLJP).<br>2. Bank Business Plan.<br>Evaluated and monitored the realization of the Bank›s Business Plan 2024 - 2026.<br>3. Anti-Fraud Strategy.<br>Monitoring and evaluating the implementation of the anti-fraud strategy. |
| ***Risk Taking Unit*** | | |
| *Risk Taking Unit* adalah satuan kerja operasional yang mengambil dan melaksanakan keputusan atas risiko yang antara lain meliputi namun tidak terbatas pada kegiatan perkreditan, *treasury*, sistem informasi, dan akunting termasuk kantor operasional.<br>The Risk-Taking Unit is an operational unit that takes and executes decisions regarding risks, including but not limited to lending activities, treasury operations, information systems, accounting, and operational offices. | *Risk Taking Unit* bertanggung jawab atas masing-masing risiko pada setiap aktivitas bisnis baik oleh Satuan kerja bisnis maupun oleh satuan kerja operasional. | The Risk Taking Unit is responsible for each risk in every business activity, both by business units and operational units. |

| Organ | Wewenang dan Tanggung Jawab<br>Authority and Responsibility | |
|---|---|---|
| **Pengendalian Internal**<br>Internal Control | | |
| Sistem Pengendalian Internal Bank didukung oleh fungsi pengawasan dari Satuan Kerja Audit Internal (SKAI) serta pengawasan dari Satuan Kerja Kepatuhan (SKK).<br>The Bank's Internal Control System is supported by supervisory function of the Internal Audit Work Unit (IAU) and the Compliance Work Unit (SKK). | Berdasarkan Peraturan Otoritas Jasa Keuangan No. 1/POJK.03/2019 tentang Penerapan Fungsi Audit Intern Pada Bank Umum, SKAI mempunyai wewenang paling sedikit:<br>• Mengakses seluruh informasi yang relevan tentang Bank terkait dengan tugas dan fungsi SKAI;<br>• Melakukan komunikasi secara langsung dengan Direksi, Dewan Komisaris, dan Komite Audit, serta Dewan Pengawas Syariah bagi bank umum syariah dan bank umum konvensional yang memiliki unit usaha syariah;<br>• Menyelenggarakan rapat secara berkala dan insidental dengan Direksi, Dewan Komisaris, dan Komite Audit, serta Dewan Pengawas Syariah bagi Bank Umum Syariah dan Bank Umum Konvensional yang memiliki Unit Usaha Syariah;<br>• Melakukan koordinasi kegiatan dengan auditor eksternal; dan<br>• Mengikuti rapat yang bersifat strategis.<br><br>Tugas pokok SKAI paling sedikit:<br>• Membantu tugas direktur utama dan Dewan Komisaris dalam melakukan pengawasan dengan cara menjabarkan secara operasional baik perencanaan, pelaksanaan, maupun pemantauan hasil audit;<br>• Membuat analisis dan penilaian di bidang keuangan, akuntansi, operasional, dan kegiatan lain melalui audit;<br>• Mengidentifikasi segala kemungkinan untuk memperbaiki dan meningkatkan efisiensi penggunaan sumber daya dan dana; dan<br>• Memberikan saran perbaikan dan informasi yang objektif tentang kegiatan yang diperiksa pada tingkatan manajemen.<br><br>Di samping itu, berdasarkan Peraturan Otoritas Jasa Keuangan No. 46/POJK.03/2017 tentang Pelaksanaan Fungsi Kepatuhan Bank Umum, tugas dan tanggung jawab SKK paling sedikit:<br>• Membuat langkah untuk mendukung terciptanya Budaya Kepatuhan pada seluruh kegiatan usaha Bank pada setiap jenjang organisasi;<br>• Melakukan identifikasi, pengukuran, pemantauan, dan pengendalian terhadap Risiko Kepatuhan dengan mengacu pada ketentuan Otoritas Jasa Keuangan yang mengatur mengenai penerapan manajemen risiko bagi Bank Umum dan ketentuan Otoritas Jasa Keuangan yang mengatur mengenai penerapan manajemen risiko bagi Bank Umum Syariah dan Unit Usaha Syariah;<br>• Menilai dan mengevaluasi efektivitas, kecukupan, dan kesesuaian kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank dengan ketentuan peraturan perundang-undangan;<br>• Melakukan kaji ulang dan/atau merekomendasikan pengkinian dan penyempurnaan kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank agar ketentuan peraturan perundang-undangan, termasuk prinsip syariah bagi Bank Umum Syariah dan Unit Usaha Syariah;<br>• 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<br>• Melakukan tugas lain yang terkait dengan Fungsi Kepatuhan. | Based on Financial Services Authority Regulation No. 1/POJK.03/2019 concerning the Implementation of the Internal Audit Function at Commercial Banks, the Internal Audit Work Unit (IAU) has the authority to at least:<br>• Accessing all relevant information about the Bank related to the duties and functions of IAU;<br>• Communicating directly with the Board of Directors, Board of Commissioners, and Audit Committee, as well as the Sharia Supervisory Board for sharia commercial banks and conventional commercial banks that have Sharia business units;<br>• Organizing regular and incidental meetings with the Board of Directors, the Board of Commissioners, and the Audit Committee, as well as the Sharia Supervisory Board for sharia commercial banks and conventional commercial banks that have Sharia business units;<br>• Coordinating activities with external auditors; and<br>• Attending strategic meetings.<br><br>The main duties of IAU at least:<br>• Assisting the president director and the Board of Commissioners in carrying out supervision by operationally elaborating the planning, implementation, and monitoring of audit results;<br>• Preparing analysis and assessment related to finance, accounting, operations, and other activities through audits;<br>• Identifying all possibilities to improve and increase the efficiency of the use of resources and funds; and<br>• Providing improvement advice and objective information about the activities examined at all levels of management.<br><br>In addition, based on Financial Services Authority Regulation No. 46/POJK.03/2017 concerning the implementation of Compliance Function for Commercial Banks, duties and responsibilities of the Compliance Work Unit (SKK) at least:<br>• Preparing actions to support the establishment of a Compliance Culture in all Bank business operations at all organizational levels;<br>• Identifying, measuring, monitoring, and controlling Compliance Risk refers to the provisions of the Financial Services Authority, which regulate the implementation of risk management for commercial banks, and the provisions of the Financial Services Authority, which regulate the implementation of risk management for Sharia commercial banks and sharia business units;<br>• Assessing and evaluating the effectiveness, adequacy, and conformity of policies, provisions, systems, and procedures of the Bank with laws and regulations;<br>• Reviewing and/or recommending an update and improvement of the policies, provisions, systems, and procedures of the Bank to comply with laws and regulations, including sharia principles for sharia commercial banks and sharia business units;<br>• Attempting to ensure that the policies, provisions, systems, and procedures, as well as the Bank's business activities, are in accordance with the provisions of the Financial Services Authority and laws and regulations; and<br>• Performing other duties related to the Compliance Function. |

## Konglomerasi Keuangan Terintegrasi Sinarmas

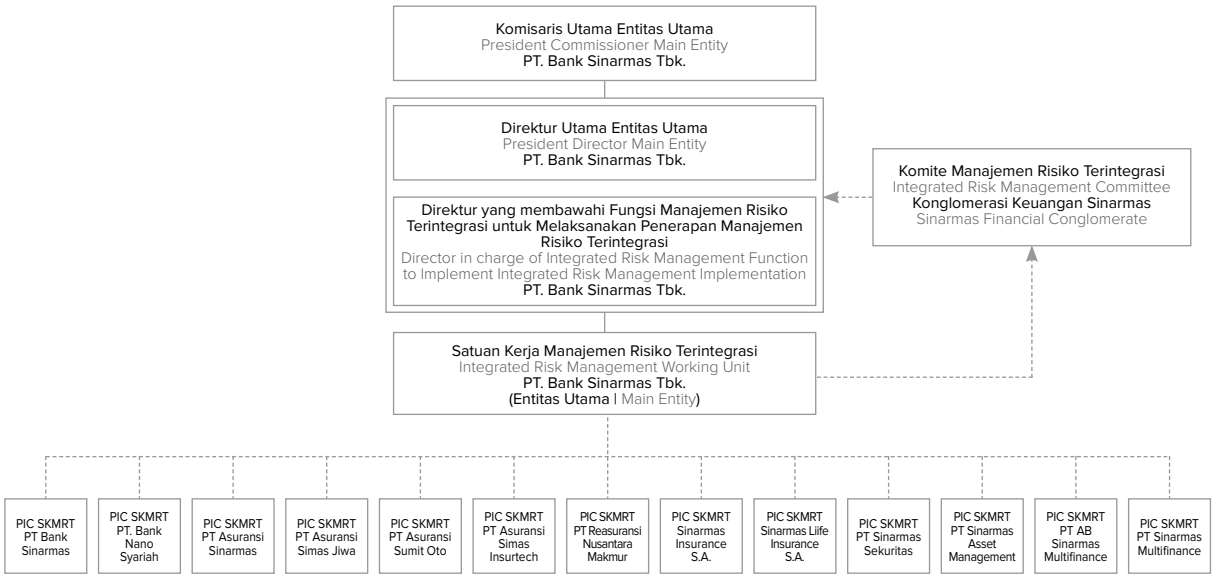
Bank, sesuai dengan Surat Otoritas Jasa Keuangan No. S-95/PB.33/2015 tanggal 1 Oktober 2015 tentang Penetapan PT. Bank Sinarmas Tbk. yang ditunjuk sebagai Entitas Utama Grup Sinarmas dari Konglomerasi Keuangan Sinarmas yang menjalani fungsi dalam menerapkan manajemen risiko terintegrasi yang efektif dengan struktur organisasi sebagai berikut.

## Sinarmas Integrated Financial Conglomeration

The Bank, in accordance with Financial Services Authority Letter No. S-95/PB.33/2015 dated October 1, 2015, on the Designation of PT. Bank Sinarmas Tbk. appointed as the Main Entity of Sinarmas Group, is appointed as the Main Entity of Sinarmas Financial Conglomeration, which functions to implement effective integrated risk management with the following organizational structure.

## Struktur Organisasi Manajemen Risiko Terintegrasi Sinarmas

## Organizational Structure of Sinarmas Integrated Risk Management




Keterangan | Description:
------ : Garis Koordinasi dengan PIC | Coordination Line with PIC

## Organ Struktur Manajemen Risiko Terintegrasi Sinarmas

### Structure Organ of the Integrated Risk Management of Sinarmas

| Organ | Tugas dan Tanggung Jawab<br>Duties and Responsibilities | |
|---|---|---|
| **Satuan Kerja Manajemen Risiko Terintegrasi**<br>**Integrated Risk Management Work Unit** | | |
| Merupakan Satuan Kerja Manajemen Risiko Terintegrasi yang dibentuk sesuai dengan karakteristik dan kompleksitas risiko Konglomerasi keuangan yang berada di bawah Entitas Utama.<br>An Integrated Risk Management Work Unit established in accordance with the characteristics and complexity of the risks of the financial conglomeration under the Main Entity. | • Memberikan masukan kepada Direksi Entitas Utama antara lain dalam penyusunan kebijakan Manajemen Risiko Terintegrasi;<br>• Memantau pelaksanaan kebijakan Manajemen Risiko Terintegrasi termasuk mengembangkan prosedur dan alat untuk identifikasi, pengukuran, pemantauan, dan pengendalian Risiko;<br>• Melakukan pemantauan risiko pada Konglomerasi Keuangan berdasarkan hasil penilaian:<br>• Profil Risiko setiap LJK dalam Konglomerasi Keuangan;<br>- Tingkat Risiko masing-masing risiko secara terintegrasi;<br>- Profil Risiko secara terintegrasi;<br>• Melakukan *stress testing* secara berkala;<br>• Melakukan pemantauan kecukupan pemenuhan modal minimum terintegrasi secara berkala;<br>• Melaksanakan kaji ulang secara berkala untuk memastikan:<br>- Keakuratan metodologi penilaian risiko;<br>- Kecukupan implementasi sistem informasi manajemen;<br>- Ketepatan kebijakan, prosedur, dan penetapan limit risiko secara terintegrasi;<br>• Mengkaji usulan lini bisnis baru yang bersifat strategis dan berpengaruh signifikan terhadap eksposur Risiko Konglomerasi Keuangan;<br>• Memberikan informasi kepada Komite Manajemen Risiko Terintegrasi terhadap hal-hal yang perlu ditindaklanjuti terkait hasil evaluasi terhadap penerapan Manajemen Risiko Terintegrasi;<br>• Memberikan masukan kepada Komite Manajemen Risiko Terintegrasi, dalam rangka penyusunan dan penyempurnaan kebijakan Manajemen Risiko Terintegrasi; dan<br>• Menyusun dan menyampaikan laporan Profil Risiko Terintegrasi secara berkala kepada Direktur dari Entitas Utama yang membawahkan Fungsi Manajemen Risiko Terintegrasi dan kepada Komite Manajemen Risiko Terintegrasi. | • Providing input to the Board of Directors of the Main Entity, including in the formulation of Integrated Risk Management policies;<br>• Monitoring the implementation of Integrated Risk Management policies, including developing procedures and tools for risk identification, measurement, monitoring, and control;<br>• Conducting risk monitoring in the Financial Conglomeration based on assessment results:<br>• Risk Profile of each Financial Services Institution in the Financial Conglomeration;<br>- The risk level of each risk in an integrated manner;<br>- The integrated risk profile;<br>• Conducting periodic stress testing;<br>• Conducting regular monitoring of integrated compliance with minimum capital adequacy;<br>• Conducting periodic reviews to ensure:<br>- The accuracy of the risk assessment methodology;<br>- The adequacy of management information system implementation;<br>- The accuracy of policies, procedures, and risk limit setting in an integrated manner;<br>• Reviewing proposals for new strategic business lines that significantly impact the exposure of the Financial Conglomeration›s Risks;<br>• Providing information to the Integrated Risk Management Committee on matters requiring follow-up related to the evaluation results of the implementation of Integrated Risk Management;<br>• Providing input to the Integrated Risk Management Committee in the formulation and improvement of Integrated Risk Management policies; and<br>• Compiling and presenting Integrated Risk Profile reports periodically to the Director of the Main Entity in charge of the Integrated Risk Management Function and to the Integrated Risk Management Committee. |

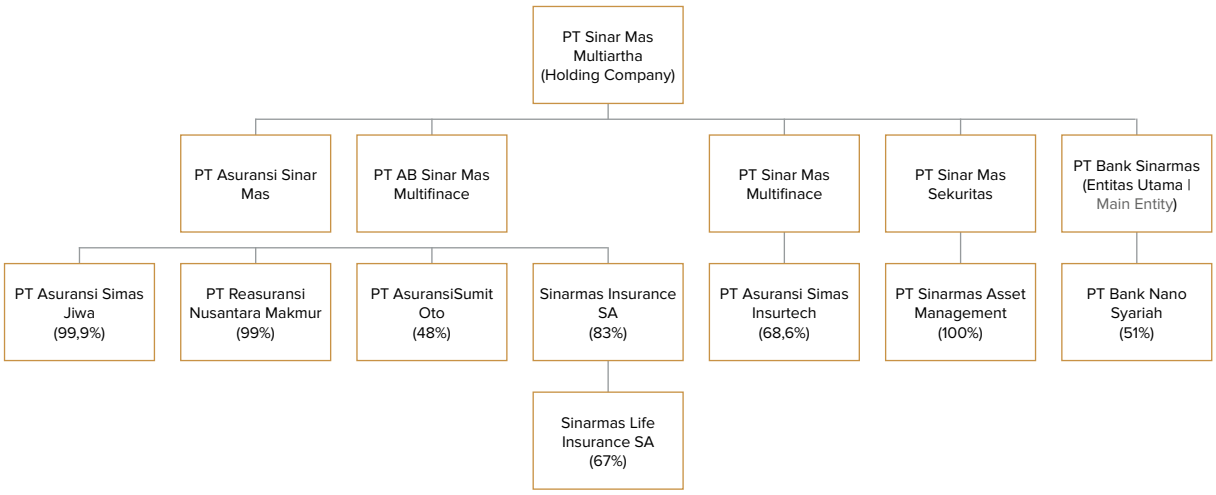
| Organ | Tugas dan Tanggung Jawab<br>Duties and Responsibilities | |
|---|---|---|
| **Satuan Kerja Manajemen Risiko Lembaga Jasa Keuangan Non-Bank (LJKNB)**<br>Risk Management Work Unit for Non-Bank Financial Services Institutions (LJKNB) | | |
| Merupakan Satuan Kerja Manajemen Risiko yang terdapat dalam Lembaga Jasa Keuangan yang tergabung pada Konglomerasi Keuangan Sinar Mas.<br>A Risk Management Work Unit within a Financial Services Institution that is part of Sinar Mas Financial Conglomeration. | • Mengidentifikasi risiko, termasuk risiko yang melekat pada kegiatan usaha LJKNB;<br>• Menyusun metode pengukuran risiko;<br>• Memantau pelaksanaan strategi manajemen risiko yang telah disusun oleh Direksi;<br>• Memantau posisi risiko secara keseluruhan, per jenis risiko, dan per jenis aktivitas fungsional, serta melakukan pengujian dengan menggunakan skenario/ asumsi kondisi tidak normal dan pengujian dengan menggunakan data historis;<br>• Mengkaji ulang secara berkala terhadap proses manajemen risiko;<br>• Mengkaji usulan pengembangan atau perluasan kegiatan usaha;<br>• Mengevaluasi terhadap akurasi model dan validitas data yang digunakan untuk mengukur risiko, bagi LJKNB yang menggunakan model untuk keperluan internal;<br>• Memberikan rekomendasi kepada fungsi bisnis dan operasional dan/atau kepada Komite Manajemen Risiko, sesuai kewenangan yang dimiliki; dan<br>• Menyusun dan menyampaikan Laporan Tingkat Kesehatan kepada Direktur Utama atau yang setara, atau anggota Direksi yang membawahkan Fungsi Manajemen Risiko dan Komite Manajemen Risiko secara berkala. | • Identifying risks, including those inherent in the business activities of Non-Bank Financial Services Institutions (LJKNB);<br>• Developing risk measurement methods;<br>• Monitoring the implementation of the Risk Management strategy that has been prepared by the Board of Directors;<br>• Monitoring the overall risk position, per type of risk, and type of functional activity, as well as conducting tests using scenarios/assumptions of abnormal conditions and testing using historical data;<br>• Periodically reviewing the Risk Management process;<br>• Reviewing the proposed development or expansion of business activities;<br>• Evaluating the accuracy of the model and the validity of the data used to measure risk for LJKNB that use the model for internal purposes;<br>• Providing recommendations on business and operational functions and/or to the Risk Management Committee, according to their authority; and<br>• Preparing and submitting risk profile reports to the President Director or equivalent, or members of the Board of Directors in charge of the risk management function and the Risk Management Committee regularly. |
| **Komite Manajemen Risiko Terintegrasi**<br>Integrated Risk Management Committee | | |
| Komite Manajemen Risiko Terintegrasi merupakan komite yang dibentuk dengan tujuan menjalankan fungsi manajemen risiko terintegrasi dengan merekomendasikan kerangka atau kebijakan yang terintegrasi untuk mengidentifikasi, mengukur, memantau, mengelola, dan mengendalikan seluruh faktor risiko.<br>The Integrated Risk Management Committee is a committee formed aiming to carry out integrated risk management functions by recommending an integrated framework or policy to identify, measure, monitor, manage, and control all risk factors. | Komite Manajemen Risiko Terintegrasi memiliki tugas dan tanggung jawab, yaitu memberikan rekomendasi kepada Direksi Entitas Utama berupa:<br>1. Penyusunan dan perbaikan Kebijakan Manajemen Risiko Terintegrasi berupa penyempurnaan strategi dan kerangka Risiko berdasarkan hasil evaluasi pelaksanaan termasuk tingkat risiko yang diambil serta toleransi risiko yang dapat di terima.<br>2. Merekomendasikan Laporan yang dipantau seperti Profil Risiko Konglomerasi Keuangan, Laporan Kewajiban Penyediaan Modal Minimun Terintegrasi Konglomerasi Keuangan, Laporan Transaksi Intragrup dan Laporan *Stress Test* yang wajib disampaikan secara berkala kepada regulator.<br><br>**Keanggotaan Komite Manajemen Risiko Terintegrasi.**<br>a. Ketua (merangkap anggota tetap) yaitu Direktur Entitas Utama yang Membawahi Manajemen Risiko Terintegrasi.<br>b. Sekretaris (merangkap anggota tetap) yaitu *Risk Management Group Head.*<br>c. Anggota Tetap terdiri dari Direktur Utama Entitas Utama dan Seluruh Direktur Lembaga Jasa Keuangan Konglomerasi Keuangan Sinar Mas yang membawahi Fungsi Manajemen Risiko dan/atau Direktur yang ditunjuk oleh Lembaga Jasa Keuangan.<br>d. Anggota Tidak Tetap terdiri dari *Compliance Group Head* Entitas Utama, *Internal Audit Group Head* Entitas Utama, dan Satuan Kerja yang melaksanakan fungsi Manajemen Risiko pada masing-masing Lembaga Jasa Keuangan Konglomerasi Keuangan Sinar Mas.<br><br>**Keputusan Komite Manajemen Risiko Terintegrasi.**<br>1. Keputusan Rapat Komite Manajemen Risiko Terintegrasi dilakukan dengan tujuan untuk mencapai musyawarah dan mufakat.<br>2. Pengambilan keputusan dilakukan berdasarkan pemungutan suara dan dinyatakan sah apabila disetujui oleh lebih dari 50% anggota tetap yang hadir.<br>3. Selain dilakukan rapat, keputusan dapat dilakukan melalui sirkulasi dan/ atau email, dan<br>4. Rapat dapat dinyatakan sah/quorum apabila disetujui oleh lebih dari 50% jumlah anggota termasuk Ketua komite manajemen risiko dan/atau Sekretaris Komite. | The Integrated Risk Management Committee has duties and responsibilities, namely to provide reccomendations to the Board of Director of the Main Entity in the form of:<br>1. Preparation and improvement of Integrated Risk Management Policy in the form of refinement of strategy and risk framework based on the results of implementation evaluation, including the level of risk taken and acceptable risk tolerance.<br>2. Recommending monitored Reports such as Financial Conglomerate Risk Profile, Financial Conglomerate Integrated Capital Adequacy Report, Intergroup Transaction Report, and Stress Test Report, which must be submitted periodically to the regulator.<br><br>**Integrated Risk Management Committee Membership**<br>a. Chairman (also serving as a permanent member), namely the Director of the Main Entity in Charge of integrated risk management;<br>b. Secretary (also serving as a permanent member), namely the Risk Management Group Head;<br>c. Permanent Members, consisting of the President Director of the Main Entity and all Directors of Financial Services Institutions of the Sinar Mas Financial Conglomeration in Charge of Risk Management Functions and/or Directors appointed by Financial Services Institutions; and<br>d. Non-permanent Members, consisting of the Compliance Group Head of the Main Entity, the Internal Audit Group Head of the Main Entity, and Units carrying out Risk Management functions in each Financial Services Institution of the Sinar Mas Financial Conglomeration.<br><br>**Integrated Risk Management Committee Decision**<br>1. Decisions of the Integrated Risk Management Committee Meeting were made to achieve deliberation and consensus.<br>2. Decision-making is based on voting and is valid if approved by more than 50% of the permanent members present.<br>3. In addition to meetings, decisions may be made through circulation and/or email, and<br>4. Meetings can be declared valid/quorum if approved by more than 50% of the total members, including the Chairman of the risk management committee and/or the Secretary of the Committee. |

| Organ | Tugas dan Tanggung Jawab<br>Duties and Responsibilities | |
|---|---|---|
| | **Realisasi Rencana Kerja Komite Manajemen Risiko Terintegrasi 2024.**<br>1. *Monitoring* Penyempurnaan Manajemen Risiko Terintegrasi Tahun 2023 yang telah dan/atau akan dilakukan di tahun 2024.<br>2. *Monitoring* rencana pertumbuhan kredit dan pembiayaan selama tahun 2024.<br>3. *Monitoring* perbaikan kualitas kredit Lembaga Jasa Keuangan Bank dan pembiayaan.<br>4. *Monitoring* konsentrasi investasi pada pihak terafiliasi, BUMN dan perusahaan yang memiliki kinerja negatif dan dampak kinerja surat berharga/investasi yang dimiliki oleh Konglomerasi Keuangan terhadap rentabilitas.<br>5. *Monitoring* Batas Maksimum Pemberian Pembiayaan (BMPP), Batas Maksimum Pemberian Kredit (BMPK), Batas Maksimum Penyediaan Dana (BMPD) dan Batas Maksimum Investasi (BMI).<br>6. *Monitoring* Sinergi Bisnis Anggota Konglomerasi Keuangan Sinar Mas.<br>7. *Monitoring* Perubahan berupa Penambahan dan pengurangan anggota Konglomerasi Keuangan.<br>8. Merekomendasikan Metodologi Pengukuran Penilaian Laporan Tingkat Kesehatan Terintegrasi Konglomerasi Keuangan Sinar Mas baik dari penilaian per bidang usaha maupun per jenis risiko untuk digunakan di tahun 2024.<br>9. *Monitoring* Simulasi Laporan Tingkat Kesehatan Terintegrasi Konglomerasi Keuangan Sinar Mas tahun 2023.<br>10. Merekomendasikan metodologi dan parameter *Risk Appetite* dan/atau *Risk Tolerance* Konglomerasi Keuangan Sinar Mas tahun 2024.<br>11. Mengetahui dan merekomendasikan Rencana Kerja Satuan Kerja Manajemen Risiko Terintegrasi 2023.<br>12. Merekomendasikan Kaji Ulang untuk Parameter, Rentang Risiko, Bobot Risiko Laporan Profil Risiko Terintegrasi Tahun 2024.<br>13. *Monitoring performance* Konglomerasi Keuangan Sinar Mas Semester II – 2023 dan Semester I – 2024 diantaranya total aset, modal, dan laba serta penghargaan yang diterima.<br>14. Merekomendasikan Laporan Profil Risiko Terintegrasi Posisi Semester II – 2023 dan Semester I – 2024.<br>15. Merekomendasikan Laporan Kewajiban Penyediaan Modal Minimum (KPMM) Terintegrasi Posisi Semester II – 2023 dan Semester I – 2024.<br>16. Merekomendasikan Laporan *Stress Testing* Terintegrasi KK Sinar Mas Semester II – 2023 dan Semester I – 2024<br>17. *Monitoring* Tindak Lanjut Pemantauan Dan Langkah Perbaikan mengacu pada Surat OJK S-12/PB.11/2024 tertanggal 02 Mei 2024.<br>18. *Monitoring Risk Appetite* dan *Risk Tolerance* Semester I – 2024 dan Semester II - 2024.<br><br>**Rapat Komite Manajemen Risiko Terintegrasi**<br>Komite Manajemen Risiko Terintegrasi mengadakan rapat secara berkala minimal 2 (dua) kali dalam setahun dan rapat Adhoc di luar rapat berkala yang dihadiri oleh seluruh anggota.<br>Selama tahun 2024, Komite Manajemen Risiko Terintegrasi telah menyelenggarakan rapat secara berkala sebanyak 6 (enam) kali rapat. | Implementation of Integrated Risk Management Committee Work Plan in 2024<br>1. Monitoring of Integrated Risk Management Enhancements in 2023 that have been and/or will be carried out in 2024.<br>2. Monitoring of credit and financing growth plans during 2024.<br>3. Monitoring of credit quality improvement of Bank Financial Services Institutions and financing.<br>4. Monitoring the concentration of investments in affiliated parties, SOEs, and companies that have negative performance and the impact of the performance of securities/investments held by the Financial Conglomerate on profitability.<br>5. Monitoring of Maximum Financing Limit (BMPP), Maximum Lending Limit (BMPK), Maximum Provision of Funds Limit (BMPD), and Maximum Investment Limit (BMI).<br>6. Monitoring of Business Synergy of Sinar Mas Financial Conglomerate Members.<br>7. Monitoring Changes in the form of Addition and Subtraction of Financial Conglomeration members.<br>8. Recommending the Measurement Methodology for the Assessment of the Sinar Mas Financial Conglomerate Integrated Soundness Level Report both from the assessment per line of business and per type of risk to be used in 2024.<br>9. Monitoring the Simulation of Integrated Soundness Level Report of Sinar Mas Financial Conglomerate in 2023.<br>10. Recommending the methodology and parameters of Risk Appetite and/or Risk Tolerance of Sinar Mas Financial Conglomeration in 2024.<br>11. Reviewing and recommending the 2023 Integrated Risk Management Work Unit Work Plan.<br>12. Recommending Review for Parameters, Risk Range, and Risk Weight of Integrated Risk Profile Report in 2024.<br>13. Monitoring the performance of Sinar Mas Financial Conglomeration Semester II - 2023 and Semester I - 2024, including total assets, capital, and profit as well as awards received.<br>14. Recommending the Integrated Risk Profile Report for Semester II - 2023 and Semester I - 2024.<br>15. Recommending the Integrated Capital Adequacy Report (CAR) for Semester II - 2023 and Semester I - 2024.<br>16. Recommending the Integrated Stress Testing Report of KK Sinar Mas for Semester II - 2023 and Semester I - 2024.<br>17. Monitoring Follow-up and Corrective Steps referring to OJK Letter S-12/PB.11/2024 dated May 2, 2024.<br>18. Monitoring Risk Appetite and Risk Tolerance Semester I - 2024 and Semester II - 2024.<br><br>**Integrated Risk Management Committee Meeting**<br>The Integrated Risk Management Committee held regular meetings at least 2 (two) times a year and Adhoc meetings outside the regular meetings attended by all members.<br><br>During 2024, the Integrated Risk Management Committee held 6 (six) regular meetings. |

| Organ | Tugas dan Tanggung Jawab<br>Duties and Responsibilities |
|---|---|
| **Pengendalian Internal**<br>Internal Control | |
| | Entitas Utama secara bertahap telah melaksanakan sistem pengendalian intern yang menyeluruh terhadap Penerapan Manajemen Risiko Terintegrasi.<br><br>Sistem pengendalian intern disusun agar dapat memastikan:<br>• Dipatuhinya kebijakan atau ketentuan intern serta peraturan dan perundang-undangan yang berlaku;<br>• Tersedianya informasi keuangan dan manajemen yang lengkap, akurat, tepat guna, dan tepat waktu; dan<br>• Efektivitas Budaya Risiko (*Risk Culture*) pada organisasi Konglomerasi Keuangan secara menyeluruh.<br><br>Pada Konglomerasi Keuangan Sinarmas juga telah dilakukan pemisahan satuan kerja yang melaksanakan Fungsi Manajemen Risiko Terintegrasi dan yang melaksanakan Fungsi Pengendalian Internal (Audit Internal) dengan Satuan Kerja Operasional (*Risk-Taking Unit*) pada Entitas Utama, Entitas Anak, dan perusahaan terelasi. Selain itu, pada seluruh entitas dipastikan agar terdapat dokumentasi prosedur yang memadai, yaitu dokumentasi yang tertulis, lengkap, dan memudahkan untuk dilakukan jejak audit (*audit trail*) untuk keperluan pengendalian internal. |
| | The Main Entity has gradually carried out a comprehensive internal control system in the Implementation of Integrated Risk Management.<br><br>The internal control system is designed to ensure:<br>• Compliance with internal policies or regulations and applicable laws and regulations;<br>• Availability of complete, accurate, relevant, and timely financial and management information; and<br>• Effectiveness of Risk Culture throughout the Financial Conglomeration organization.<br><br>At Sinarmas Financial Conglomeration, a separation of work units has also been implemented between those responsible for Integrated Risk Management Functions and those responsible for Internal Control Functions (Internal Audit) within the Operational Work Units (Risk-Taking Unit) in the Main Entity, Subsidiaries, and related companies. Additionally, procedural documentation is ensured to be available across all entities, namely written, complete documentation that facilitates audit trails for internal control purposes. |

## Susunan Anggota Konglomerasi Keuangan Sinarmas

## Composition of Members of Sinarmas Financial Conglomeration




Konglomerasi Keuangan Sinarmas, terdiri dari 13 (tiga belas) Lembaga Jasa Keuangan (LJK) yang berada di bawah kepemilikan PT Sinar Mas Multiartha sebagai *Holding Company*, yaitu PT. Bank Sinarmas Tbk., PT Bank Nano Syariah, PT Asuransi Sinar Mas, PT Asuransi Simas Jiwa, PT Asuransi Sumit Oto, PT Asuransi Simas Insurtech, Sinarmas Insurance SA, Sinarmas Life Insurance SA, PT Reasuransi Nusantara Makmur, PT Sinar Mas Multifinance, PT AB Sinar Mas Multifinance, PT Sinarmas Sekuritas dan PT Sinarmas Asset Management. Sesuai dengan keputusan Otoritas Jasa Keuangan, maka PT. Bank Sinarmas Tbk. ditunjuk sebagai Entitas Utama bagi Konglomerasi Keuangan Sinarmas yang bertanggung jawab atas penerapan Manajemen risiko terintegrasi serta tata kelola terintegrasi bagi seluruh *sister company* yang masuk sebagai bagian dalam Konglomerasi Keuangan Sinar Mas.

Sinarmas Financial Conglomeration consists of 13 (thirteen) Financial Services Institutions (FSIs) under the ownership of PT Sinar Mas Multiartha as the Holding Company, namely PT. Bank Sinarmas Tbk., PT Bank Nano Syariah, PT Asuransi Sinar Mas, PT Asuransi Simas Jiwa, PT Asuransi Sumit Oto, PT Asuransi Simas Insurtech, Sinarmas Insurance SA, Sinarmas Life Insurance SA, PT Reasuransi Nusantara Makmur, PT Sinar Mas Multifinance, PT AB Sinar Mas Multifinance, PT Sinarmas Sekuritas, and PT Sinarmas Asset Management. In accordance with the decision of the Financial Services Authority, PT. Bank Sinarmas Tbk. is appointed as the Main Entity for the Sinarmas Financial Conglomeration, which is responsible for the implementation of integrated risk management and integrated governance for all sister companies included as part of the Sinar Mas Financial Conglomeration.

Konglomerasi Keuangan Sinar Mas mencakup 4 bidang usaha yaitu Bank, Pembiayaan, Asuransi (Umum, Jiwa, Reasuransi) dan Perusahaan Efek (Sekuritas dan *Asset Management*). Keseluruhan LJK dalam konglomerasi keuangan Sinar Mas tersebut merupakan LJK yang sudah cukup dikenal serta memiliki keunggulan kompetitif di masing-masing industri.

Sepanjang tahun 2024, beberapa LJK di dalam Konglomerasi Keuangan Sinar Mas juga telah memperoleh berbagai penghargaan, seperti:

1. PT Bank Sinarmas, antara lain yaitu :
   - *The 1st Best Branch* ATM Bank Umum Konvensional 2024;
   - *The 2nd Live Chat* Bank Umum Konvensional 2024;
   - *Indonesia Best Bank 2024 for Enhancing Performance Growth through Strategies Implementation*;
   - *Smartfren Appreciation & Collaboration Day 2024: Best Innovative Technology Integration*;
   - *Smartfren Appreciation & Collaboration Day 2024: Best Business Productivity Transformation*;
   - *Asian Technology Excellence Awards 2024 - Indonesia Technology Excellence Award for Automation - MSME Loan Origination System*;
   - *Asian Technology Excellence Awards 2024 - Indonesia Technology Excellence Award for Mobile - SimobiPlus Revamp*;
   - *The Best Indonesia Annual Report Award 2024 - Platinum Award (A)(Very Excellent) (5 Stars *****)*;
   - *TOP 100 CEO & 200 Future Leaders Forum 2024 - HOW GREAT LEADER CREATES MORE LEADERS*.

2. PT Bank Nano Syariah antara lain yaitu:
   - Warta Ekonomi – *Indonesia Sharia and Halal Top Brand Awards* 2024;
   - *Marketeers Editor's Choice AWARD 2024 The Most Innovative Charity Platform of The Year 2024*;
   - Bank Penerima Setoran Biaya Penyelenggaraan Ibadah Haji 2024 – 2027;
   - BPKH *Banking Award 2024:*
     - BPS BPIH Pendaftar Haji Terbaik 2024, Kategori Bank Nasional - BUS : Terbaik 3;
     - BPS BPIH Pendaftar Haji Muda Terbaik 2024, Kategori Bank Nasional - BUS : Terbaik 3;
     - BPS BPIH Kontribusi Pertumbuhan Pendaftar Haji Terbaik 2024. Kategori Bank Nasional - BUS : Terbaik 3;
     - Rewarding Umrah Pencapaian Terbaik Semester 2 (Juli s/d Nov 2024), Kategori BPS BPIH Bank Syariah Nasional : Terbaik 3.

3. PT Sinar Mas Multifinance antara lain yaitu:
   - *Digital Transformation Award*;
   - *Innovation Excellence Award*;
   - *AI Pitch Hackathon for Innovation with Generative AI*.

Sinarmas Financial Conglomeration consists of four business sectors: Banking, Financing, Insurance (General, Life, Reinsurance), and Securities Companies (Securities and Asset Management). All Financial Services Business Actors (PUJK) within Sinarmas Financial Conglomeration are well-known and have competitive advantages in their respective industries.

Throughout 2024, several LJK within Sinarmas Financial Conglomeration also received various awards, such as:

1. PT Bank Sinarmas, among others :
   - The 1st Best Branch ATM of Conventional Commercial Banks 2024;
   - The 2nd Live Chat of Conventional Commercial Banks 2024;
   - Indonesia Best Bank 2024 for Enhancing Performance Growth through Strategies Implementation;
   - Smartfren Appreciation & Collaboration Day 2024: Best Innovative Technology Integration;
   - Smartfren Appreciation & Collaboration Day 2024: Best Business Productivity Transformation;
   - Asian Technology Excellence Awards 2024 - Indonesia Technology Excellence Award for Automation - MSME Loan Origination System;
   - Asian Technology Excellence Awards 2024 - Indonesia Technology Excellence Award for Mobile - SimobiPlus Revamp;
   - The Best Indonesia Annual Report Award 2024 - Platinum Award (A)(Very Excellent) (5 Stars *****);
   - TOP 100 CEO & 200 Future Leaders Forum 2024 - HOW GREAT LEADER CREATES MORE LEADERS.

2. PT Bank Nano Syariah, among others:
   - Warta Ekonomi – Indonesia Sharia and Halal Top Brand Awards 2024;
   - Marketeers Editor's Choice AWARD 2024 The Most Innovative Charity Platform of The Year 2024;
   - Recipient Bank for Hajj Pilgrimage Cost Deposit for 2024 – 2027;
   - BPKH Banking Award 2024:
     - BPS BPIH Best Hajj Registrar 2024, National Bank Category - BUS: Top 3;
     - BPS BPIH Best Young Hajj Registrar 2024, National Bank Category - BUS: Top 3;
     - BPS BPIH Best Hajj Registrant Growth Contribution 2024. National Bank Category - BUS: Top 3;
     - Rewarding Umrah for the Best Achievement of Semester 2 (July to Nov 2024), BPS BPIH National Islamic Bank Category: Top 3.

3. PT Sinar Mas Multifinance, among others:
   - Digital Transformation Award;
   - Innovation Excellence Award;
   - AI Pitch Hackathon for Innovation with Generative AI.

4. PT AB Sinar Mas Multifinance antara lain yaitu:
   - *Infobank - The Excellent Performance Multifinance Company (Asset Rp1 Trillion > Rp5 Trillion)*;
   - *The Finance - The Best Performing Multifinance 2024 (Bases on Financial Performance 2021-2023, Multifinance Company Category with Assets Rp1 Trillion Less Than Rp5 Trillion)*.

5. PT Asuransi Simas Insurtech antara lain yaitu:
   - Media Asuransi *Insurance Market Leader Awards 2024 - General Insurance Market Leader Awards 2024*;
   - *Investor trust Best Insurance* 2024 - Kategori Asuransi Umum (Aset Rp1T s/d Rp2T);
   - Media Asuransi 2024 *Insurance Awards* - Ekuitas Rp500M s/d Rp1T;
   - Media Asuransi *Digital Financial Excellence Awards 2024 - Insurtech Full Stack*.

6. PT Asuransi Sinar Mas antara lain yaitu:
   - *The Excellent Performance General Insurance Company* (*Gross Premium* > IDR 2,5 *Trillion*);
   - 2024 *Insurance Market Leaders Award*;
   - Top GRC *Awards* 2024 #Star 5 – Trophy;
   - Top GRC *Awards* 2024 - *The Most Committed GRC Leader* 2023 (Bp Howen Widjaja) – Trophy;
   - Top GRC *Golden Trophy* 2024;
   - *The Best Sharia General Insurance* 2024 (*Excellent Financial Performance* 2023).

7. PT Asuransi Simas Jiwa antara lain yaitu:
   - (*Indonesia Sharia and Halal Top Brand Awards* dari Warta Ekonomi) – *Indonesia Best Sharia Business Unit of Life Insurance 2024 with Product Information Transparency and Accessibility*;
   - (*Insurance Market Leaders Award* dari Media Asuransi) – *Life Insurance Market Leaders Award*;
   - *Indonesia Most Acclaimed Companies Awards* dari Warta Ekonomi – *Advancing Resilience with Continuous Innovation*;
   - *Best Sharia Awards dari Investortrust* – Kategori *Best Unit Link Sharia* Pendapatan Tetap Periode 5 Tahun – Simas Tasyakur *Fixed Fund*;
   - Indonesia *CEO Excellence Award* 2024 - *Indonesia CEO Excellence 2024 for Digital Transformation and Innovation in Enhancing Insurance Services and Customer Experience, Category: Life Insurance*.

8. PT Asuransi Sumit Oto antara lain yaitu:
   - *Best Insurace* 2024 - Asuransi Umum Aset diatas Rp250 Miliar - Rp500 Miliar;
   - *The Excellent Performance General Insurance Company*;
   - Media Asuransi: *Insurance Award 2024 – Best General Insurance*;
   - Bisnis Indonesia *Financial Awards* 2024 – *The Best Performance Insurance* Asuransi Umum Aset < Rp1 Triliun;

4. PT AB Sinar Mas Multifinance, among others:
   - Infobank - The Excellent Performance Multifinance Company (Asset Rp1 Trillion > Rp5 Trillion);
   - The Finance - The Best Performing Multifinance 2024 (Bases on Financial Performance 2021-2023, Multifinance Company Category with Assets Rp1 Trillion Less Than Rp5 Trillion).

5. PT Asuransi Simas Insurtech, among others:
   - Media Asuransi: Insurance Market Leader Awards 2024 - General Insurance Market Leader Awards 2024;
   - Investor trust: Best Insurance 2024 - General Insurance Category (Assets Rp1T s/d Rp2T);
   - Media Asuransi: 2024 Insurance Awards - Equity Rp500M s/d Rp1T;
   - Media Asuransi: Digital Financial Excellence Awards 2024 - Insurtech Full Stack.

6. PT Asuransi Sinar Mas, among others:
   - The Excellent Performance General Insurance Company (Gross Premium > Rp2,5 Trillion);
   - 2024 Insurance Market Leaders Award;
   - Top GRC Awards 2024 #Star 5 – Trophy;
   - Top GRC Awards 2024 - The Most Committed GRC Leader 2023 (Mr. Howen Widjaja) – Trophy;
   - Top GRC Golden Trophy 2024;
   - The Best Sharia General Insurance 2024 (Excellent Financial Performance 2023).

7. PT Asuransi Simas Jiwa, among others:
   - (Indonesia Sharia and Halal Top Brand Awards from Warta Ekonomi) – Indonesia Best Sharia Business Unit of Life Insurance 2024 with Product Information Transparency and Accessibility;
   - (Insurance Market Leaders Award from Media Asuransi) – Life Insurance Market Leaders Award;
   - Indonesia Most Acclaimed Companies Awards from Warta Ekonomi – Advancing Resilience with Continuous Innovation;
   - Best Sharia Awards from Investortrust –Best Unit Link Sharia Category with Fixed Income 5-Year Period – Simas Tasyakur Fixed Fund;
   - Indonesia CEO Excellence Award 2024 - Indonesia CEO Excellence 2024 for Digital Transformation and Innovation in Enhancing Insurance Services and Customer Experience, Category: Life Insurance.

8. PT Asuransi Sumit Oto, among others:
   - Best Insurace 2024 - General Insurance Assets above Rp250 Billion - Rp500 Billion;
   - The Excellent Performance General Insurance Company;
   - Media Asuransi: Insurance Award 2024 – Best General Insurance;
   - Bisnis Indonesia Financial Awards 2024 – The Best Performance Insurance with General Insurance Assets <Rp1 Trillion;

- *Best General Insurace 2024* – Ekuitas Rp150 Miliar – Rp250 Miliar;
- *The Best Performance General Insurance Company – Gross Premium IDR 100 Billion to < IDR 250 Billion*.

9. PT Reasuransi Nusantara Makmur antara lain yaitu:
   - *Best Reinsurance* 2024;
   - *Best Reinsurance Sharia Unit* 2024;
   - *Investortrust Best Insurance* 2024;
   - Media Asuransi *Reinsurance Market Leaders Award* 2024;
   - *The Finance Award – The Best Performing Reinsurance* 2024.

10. PT Sinarmas Asset Management antara lain yaitu:
    - *Investortrust Best Sharia Awards* 2024;
    - *Investment Management Awards* (IMA) 2024

11. PT Sinarmas Sekuritas antara lain yaitu 7 *Most Popular Brand of the Year* 2024.

## Transaksi Intragroup

Manajemen risiko transaksi intra-grup merupakan serangkaian metodologi dan prosedur yang digunakan untuk mengidentifikasi, mengukur, memantau, dan mengendalikan risiko transaksi intragrup yang timbul dari seluruh kegiatan usaha LJK yang tergabung dalam suatu Konglomerasi Keuangan.

Transaksi intragrup merupakan transaksi yang dilakukan antara suatu entitas dengan entitas lainnya secara langsung dan tidak langsung dalam satu Konglomerasi Keuangan dalam rangka pemenuhan kewajiban perjanjian tertulis maupun tidak tertulis. Kewajiban pelaporan transaksi intragrup baik dari LJK kepada Entitas Utama maupun dari Entitas Utama kepada Otoritas Jasa Keuangan dilaporkan secara triwulanan dengan format yang efektif untuk memantau dan mengevaluasi risiko pada Konglomerasi Keuangan.

Ketentuan umum pelaksanaan transaksi intragrup pada Konglomerasi Keuangan Sinarmas sebagai berikut.

1. Transaksi intragrup dilaksanakan dan disesuaikan dengan kebutuhan dari masing-masing entitas.
2. Setiap transaksi intragrup yang dilaksanakan tidak bertentangan dengan peraturan maupun ketentuan internal dan eksternal yang berlaku.
3. Setiap transaksi intra grup yang dilaksanakan oleh masing-masing LJK harus mendapatkan persetujuan sesuai dengan kewenangan di masing-masing Entitas LJK.
4. Transaksi intragrup dilaksanakan dengan memperhatikan prinsip kewajaran/*arm's length*.
5. Semua pencatatan/perjanjian kerja sama intragrup antar LJK didokumentasikan dengan baik oleh masing-masing Entitas LJK.

- Best General Insurace 2024 – Equity Rp150 Billion – Rp250 Billion;
- The Best Performance General Insurance Company – Gross Premium Rp100 Billion to < Rp250 Billion.

9. PT Reasuransi Nusantara Makmur, among others:
   - Best Reinsurance 2024;
   - Best Reinsurance Sharia Unit 2024;
   - Investortrust Best Insurance 2024;
   - Media Asuransi Reinsurance Market Leaders Award 2024;
   - The Finance Award – The Best Performing Reinsurance 2024.

10. PT Sinarmas Asset Management, among others:
    - Investortrust Best Sharia Awards 2024;
    - Investment Management Awards (IMA) 2024

11. PT Sinarmas Sekuritas, among others, 7 Most Popular Brand of the Year 2024.

## Intragroup Transactions

Risk management of intragroup transactions is a set of methodologies and procedures used to identify, measure, monitor, and control the risks of intragroup transactions arising from all business activities of Financial Services Institutions (LJK) within the Financial Conglomeration.

Intra-group transactions are transactions conducted between one entity and another, directly and indirectly, within a Financial Conglomeration for the fulfillment of written or unwritten agreement obligations. Reporting obligations for intragroup transactions, both from LJK to the Main Entity and from the Main Entity to the Financial Services Authority, are submitted quarterly with an effective format to monitor and evaluate risks within the Financial Conglomeration.

General provisions for implementing intra-group transactions in Sinarmas Financial Conglomeration are as follows:

1. Intragroup transactions are conducted and adjusted according to the needs of each entity.
2. Every intragroup transaction conducted must comply with applicable internal and external regulations and provisions.
3. Every intragroup transaction carried out by each Financial Services Institution (LJK) must obtain approval in accordance with the authority of each LJK entity.
4. Intragroup transactions are conducted in accordance with the principle of fairness/arm's length.
5. All records/agreements of intragroup cooperation among LJKs are well documented by each LJK entity.

## Profil Ketua Manajemen Risiko Terintegrasi

Direktur *Compliance and Risk Management* saat ini adalah Ibu Amandalia Johanes. Diangkat sebagai Direktur Kepatuhan PT. Bank Sinarmas Tbk. pada tanggal 23 Maret 2018 berdasarkan Surat Keputusan Anggota Dewan Komisioner Otoritas Jasa Keuangan dengan No. KEP-47/D.09/2018 tanggal 23 Maret 2018 juga ditunjuk sebagai menjadi Direktur yang membawahkan Fungsi Manajemen Risiko Terintegrasi untuk melaksanakan penerapan Manajemen Risiko Terintegrasi. Profil Amandalia Johanes telah disampaikan dalam Profil Direksi yang terdapat pada Laporan Tahunan dan Keberlanjutan ini.

## Profile of the Chairman of Integrated Risk Management

The current Compliance and Risk Management Director is Ms. Amandalia Johanes. She was appointed as the Compliance Director of PT. Bank Sinarmas Tbk on March 23, 2018, based on the Decision Letter of Members of the Board of Commissioner of Financial Services Authority with No. KEP-47/D.09/2018 dated March 23, 2018. She was also appointed as the Director overseeing the Integrated Risk Management Function to implement Integrated Risk Management. Ms. Amandalia Johanes's profile has been provided in the Profile of the Board of Directors section of this Annual and Sustainability Report.

## Profil Kepala Satuan Kerja Manajemen Risiko

## Profile of the Head of Risk Management Work Unit



**Santy Jamhari**
Kepala Satuan Kerja Manajemen Risiko
Head of Risk Management Work Unit

**Kewarganegaraan** | Citizenship
Indonesia

**Domisili** | Domicile
Jakarta

**Usia** | Age
43 tahun | years old

**Periode dan Dasar Hukum Pengangkatan**
**Term of Office and Legal Basis of Appointment**

Surat Keputusan No. 1121/2024/PRESDIR-HCPPM tanggal 28 November 2024
Decree No. 1121/2024/PRESDIR-HCPPM dated November 28, 2024

**Riwayat Pendidikan** | Educational Background
Sarjana Akuntansi, Universitas Tarumanagara (2004).
Bachelor's degree in Accounting, Universitas Tarumanagara (2004).

**Riwayat Pekerjaan** | Work Experience
- Business Intelligence Group Head PT. Bank Sinarmas Tbk. (2019 – 2024)
- Strategic Alignment Group Head PT. Bank Sinarmas Tbk. (2017 – 2019)
- Customer Segmentation Group Head PT. Bank Sinarmas Tbk. (2015 – 2017)
- Privilege Banking Portfolio Manager PT Bank UOB Indonesia (2011 – 2015)
- Portfolio Growth and Cross Sell Manager PT Bank HSBC Indonesia (sebelumnya The HSBC Corporation Limited, Indonesia Branch) (2008 – 2011)
- Business Control Analyst PT XL Axiata Tbk (sebelumnya PT Excelcomindo Pratama Tbk) (2007 – 2008)
- Senior Auditor KPMG Indonesia (2004 – 2007)
- Business Intelligence Group Head of PT. Bank Sinarmas Tbk. (2019 – 2024)
- Strategic Alignment Group Head of PT. Bank Sinarmas Tbk. (2017 – 2019)
- Customer Segmentation Group Head of PT. Bank Sinarmas Tbk. (2015 – 2017)
- Privilege Banking Portfolio Manager of PT Bank UOB Indonesia (2011 – 2015)
- Portfolio Growth and Cross Sell Manager of PT Bank HSBC Indonesia (previously The HSBC Corporation Limited, Indonesia Branch) (2008 – 2011)
- Business Control Analyst of PT XL Axiata Tbk (previously PT Excelcomindo Pratama Tbk) (2007 – 2008)
- Senior Auditor of KPMG Indonesia (2004 – 2007)

**Rangkap Jabatan** | Concurrent Position
Tidak merangkap jabatan, baik pada bank, perusahaan, dan/atau lembaga lain.
Has no concurrent positions, either at banks, companies, and/or other institutions.

**Sertifikasi Profesi** | Professional Certification
Sertifikasi Manajemen Risiko Jenjang 6
Risk Management Certification Level 6

**Hubungan Afiliasi** | Affiliated Relationship
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Pengendali.
Has no affiliation with members of the Board of Commissioners, Board of Directors, and Controlling Shareholders.

## Pengawasan Aktif Dewan Komisaris, Direksi, dan Dewan Pengawas Syariah atas Penerapan Manajemen Risiko

Dewan Komisaris dan Direksi Bank Sinarmas memahami risiko-risiko yang dihadapi Bank dan memberikan arahan yang jelas, melakukan pengawasan dan mitigasi secara aktif. Dewan Komisaris menjalankan fungsi pengawasan risiko (*risk oversight*) melalui Komite Pemantau Risiko, Komite Audit, Komite Remunerasi & Nominasi dan Komite Tata Kelola Terintegrasi. Dewan Direksi menjalankan fungsi kebijakan risiko (*risk policy*), melalui *Executive Committee* seperti Komite Manajemen Risiko, Komite Manajemen Risiko Terintegrasi, ALCO, Komite Kebijakan Perkreditan, Komite Kebijakan Perkreditan, Komite *Human Capital*, dan Komite *Information Technology*.

Pada Bank Nano Syariah selaku perusahaan anak, Bank memiliki Dewan Pengawas Syariah yang bertugas melakukan supervisi atas aktivitas pada perusahaan anak. Anggota Dewan Pengawas Syariah bertindak sebagai penasihat dan konsultan bagi Direksi dan perusahaan anak dalam segala hal yang menyangkut aktivitas perbankan syariah.

## Active Monitoring of the Board of Commissioners, Board Directors, and Sharia Supervisory Board on the Implementation of Risk Management

The Board of Commissioners and Board of Directors of Bank Sinarmas understand the risks faced by the Bank and provide clear direction, conduct active supervision, and mitigation. The Board of Commissioners performs the risk oversight function through the Risk Monitoring Committee, Audit Committee, Remuneration & Nomination Committee, and Integrated Governance Committee. The Board of Directors carries out the risk policy function, through Executive Committees such as the Risk Management Committee, Integrated Risk Management Committee, ALCO, Credit Policy Committee, Credit Policy Committee, Human Capital Committee, and Information Technology Committee.

At Bank Nano Syariah as a subsidiary, the Bank has a Sharia Supervisory Board that is tasked with supervising the activities of the subsidiary. Members of the Sharia Supervisory Board act as advisors and consultants to the Board of Directors and subsidiaries in all matters concerning sharia banking activities.

### Peran Dewan Komisaris dan Direksi dalam Manajemen Risiko
**Board of Commissioners and Board of Directors' Role in Risk Management**

| Bentuk Pengawasan Aktif Dewan Komisaris<br>Form of Active Supervision of the Board of Commissioners | Tugas dan Tanggung Jawab Direksi<br>Duties and Responsibilities of the Board of Directors |
|---|---|
| Menyetujui Kebijakan Manajemen Risiko, termasuk strategi dan kerangka manajemen risiko yang ditetapkan sesuai dengan tingkat risiko yang akan diambil (*risk appetite*) dan toleransi risiko (*risk tolerance*) Bank.<br>Approve Risk Management Policies, including the strategies and risk management framework established in accordance with the risk appetite and the risk tolerance of the Bank. | Menyusun kebijakan, strategi, dan kerangka manajemen risiko secara tertulis dan komprehensif termasuk limit risiko secara keseluruhan dan per jenis Risiko, dengan memperhatikan tingkat risiko yang akan diambil (*risk appetite*) dan toleransi risiko (*risk tolerance*) sesuai kondisi Bank serta memperhitungkan dampak Risiko terhadap kecukupan permodalan. Setelah mendapat persetujuan dari Dewan Komisaris, Direksi menetapkan kebijakan, strategi, dan kerangka Manajemen Risiko.<br>Formulate written and comprehensive risk management policies, strategies, and frameworks, including overall risk limits and per type of risk, considering the risk appetite and the risk tolerance in line with the Bank's condition and considering the impact of risks on capital adequacy. Upon approval from the Board of Commissioners, the Board of Directors establishes risk management policies, strategies, and frameworks. |
| Mengevaluasi Kebijakan Manajemen Risiko dan Strategi Manajemen Risiko paling sedikit 1 kali dalam 1 tahun atau dalam frekuensi yang lebih sering dalam hal terdapat perubahan faktor yang memengaruhi kegiatan usaha Bank secara signifikan.<br>Evaluate Risk Management Policies and Strategies at least once a year or more frequently if there are significant changes in factors affecting the Bank's business activities. | Menyusun, menetapkan, dan mengkinikan prosedur dan alat untuk mengidentifikasi, mengukur, memonitor, dan mengendalikan risiko.<br>Formulate and establish transaction approval mechanisms, including those exceeding limits and authorities for each hierarchical level. |
| Mengevaluasi pertanggungjawaban Direksi dan memberikan arahan perbaikan atas pelaksanaan kebijakan Manajemen Risiko secara berkala. Evaluasi dilakukan dalam rangka memastikan bahwa Direksi mengelola aktivitas dan Risiko Bank secara efektif.<br>Evaluate the accountability of the Board of Directors and provide guidance for improvement in the implementation of risk management policies periodically. The evaluation is conducted to ensure that the Board of Directors manages the Bank's activities and risks effectively. | Menyusun dan menetapkan mekanisme persetujuan transaksi, termasuk yang melampaui limit dan kewenangan untuk setiap jenjang jabatan.<br>Formulate and establish transaction approval mechanisms, including those exceeding limits and authorities for each hierarchical level. |

| Bentuk Pengawasan Aktif Dewan Komisaris<br>Form of Active Supervision of the Board of Commissioners | Tugas dan Tanggung Jawab Direksi<br>Duties and Responsibilities of the Board of Directors |
|---|---|
| Memastikan kebijakan dan proses manajemen risiko dilaksanakan secara efektif dan terintegrasi dalam proses manajemen risiko secara keseluruhan.<br>Ensures that the risk management's policy and processes are effectively and integrated implemented into overall risk management processes. | • Mengevaluasi dan/atau mengkinikan kebijakan, strategi, dan kerangka manajemen risiko paling sedikit 1 kali dalam 1 tahun atau dalam frekuensi yang lebih sering dalam hal terdapat perubahan faktor yang mempengaruhi kegiatan usaha Bank, eksposur Risiko, dan/atau Profil Risiko secara signifikan;<br>• Menetapkan struktur organisasi, termasuk wewenang dan tanggung jawab yang jelas pada setiap jenjang jabatan yang terkait dengan penerapan manajemen risiko;<br>• Bertanggung jawab atas pelaksanaan kebijakan, strategi, dan kerangka manajemen risiko yang telah disetujui oleh Dewan Komisaris serta mengevaluasi dan memberikan arahan berdasarkan laporan yang disampaikan oleh Satuan Kerja Manajemen Risiko (SKMR) termasuk laporan mengenai Profil Risiko;<br>• Memastikan seluruh Risiko yang material dan dampak yang ditimbulkan oleh Risiko dimaksud telah ditindaklanjuti dan menyampaikan laporan pertanggungjawaban kepada Dewan Komisaris secara berkala, antara lain memuat laporan perkembangan dan permasalahan terkait risiko yang material disertai langkah-langkah perbaikan yang telah, sedang, dan akan dilakukan;<br>• Memastikan pelaksanaan langkah-langkah perbaikan atas permasalahan atau penyimpangan dalam kegiatan usaha Bank yang ditemukan oleh Satuan Kerja Audit Internal (SKAI);<br>• Mengembangkan Budaya Manajemen Risiko termasuk kesadaran risiko pada seluruh jenjang organisasi, meliputi komunikasi yang memadai kepada seluruh jenjang organisasi tentang pentingnya pengendalian internal yang efektif;<br>• Memastikan kecukupan dukungan sumber daya untuk mengelola dan mengendalikan risiko; dan<br>• Memastikan bahwa Fungsi Manajemen Risiko telah diterapkan secara independen yang dicerminkan antara lain adanya pemisahan fungsi antara SKMR yang melakukan identifikasi, pengukuran, pemantauan, dan pengendalian risiko dengan satuan kerja yang melakukan dan menyelesaikan transaksi.<br>• Evaluate and/or update risk management policies, strategies, and frameworks at least once a year or more frequently due to significant changes in factors affecting the Bank›s business activities, risk exposures, and/or risk profiles;<br>• Establish the organizational structure, including clear authorities and responsibilities at each position related to the implementation of risk management;<br>• Responsible for the implementation of risk management policies, strategies, and frameworks approved by the Board of Commissioners, as well as evaluating and providing guidance based on reports submitted by the Risk Management Work Unit (SKMR), including reports on Risk Profiles;<br>• Ensure that all material risks and the impacts caused by such risks have been followed up on and provide regular accountability reports to the Board of Commissioners, including progress reports and issues related to material risks along with corrective actions that have been, are being, or will be taken;<br>• Ensure the implementation of corrective measures for issues or deviations in the Bank›s operations identified by the Internal Audit Work Unit (IAU);<br>• Develop a Risk Management Culture, including risk awareness at all levels of the organization, including adequate communication to all organizational levels about the importance of effective internal controls;<br>• Ensure sufficient resource support to manage and control risks; and<br>• Ensure that the Risk Management Function is applied independently, reflected among others by the separation of functions between the Risk Management Work Unit responsible for identifying, measuring, monitoring, and controlling risks and the operational units performing and transaction completion. |



## Budaya Manajemen Risiko

Budaya Manajemen Risiko yang diterapkan di Bank, diuraikan sebagai berikut.

1. Pemberian materi *risk management* sebagai salah satu kurikulum didalam pelatihan/pendidikan bagi karyawan;
2. Bank Sinarmas juga telah menyertakan karyawan dalam Program Sertifikasi Manajemen Risiko serta program *refreshment* sesuai dengan sertifikasi minimum yang diwajibkan. Diharapkan dengan adanya Program Sertifikasi tersebut, seluruh karyawan memiliki pemahaman dan kesadaran risiko yang semakin baik;
3. Melakukan sosialisasi terkait risiko operasional termasuk didalamnya implementasi *Risk Control Self Assesment* (RCSA) dan *Loss Event Database* (LED) dalam rangka meningkatkan *risk awareness* karyawan pada kantor pusat, cabang, divisi bisnis dan divisi non-operasional;
4. Pelaksanaan sosialisasi Anti *Fraud* melalui Aplikasi SIDILAN;
5. Penyampaian terkait *risk awareness* melalui media email kepada seluruh karyawan seperti Materi ***Risk** Campaign* Pentingnya Implementasi SOP dalam Pengelolaan Bank;

## Risk Management Culture

The Risk Management Culture implemented at the Bank is disclosed as follows.

1. Provision of risk management material as part of the curriculum in the training/education program for employees;
2. Bank Sinarmas also sends employees to join the Risk Management Certification Program and refreshment programs according to the required minimum certification. It is expected that with this Certification Program, all employees will have a better understanding and awareness of risks;
3. Organize outreach activity on operational risks, including the implementation of risk control self-assessment (RCSA), and loss event database (LED), and to enhance risk awareness among employees at head office, branch offices, business divisions, and non-operational divisions;
4. Implementation of Anti-Fraud dissemination through the SIDILAN Application;
5. Delivery of risk awareness through email media to all employees such as Risk Campaign Material on the Importance of SOP Implementation in Bank Management;

6. *Sharing discussion* terkait Kaji Ulang Parameter Profil Risiko Terintegrasi pada Konglomerasi Keuangan Sinar Mas;
7. *Sharing discussion* terkait penerapan manajemen risiko terintegrasi bagi LJK;
8. Sosialisasi Kaji ulang *Risk Appetite* & *Risk Tolerance* kepada pemilik segmen dan unit bisnis Bank;
9. Sosialisasi Penyusunan *Risk Appetite* & *Risk Tolerance* Terintegrasi kepada LJK KK Sinar Mas;
10. Sosialisasi terkait Rencana Aksi Pemulihan kepada Direksi, Komisaris, Pejabat Eksekutif.
11. Sosialisasi Peran *Risk Management Group* (RMG) Dalam Menyampaikan *Risk Assessment* & Monitoring.
12. Sosialisasi pengukuran *Stress Testing* Bank dan *Stress Testing* Terintegrasi.
13. FGD dengan seluruh Bisnis Unit (BIU) terkait hasil penilaian sendiri profil risiko sebagai salah satu meningkatkan *awareness* dalam menjalankan bisnis.
14. FGD dengan seluruh Bisnis Unit (BIU) terkait hasil penilaian sendiri profil risiko sebagai salah satu meningkatkan *awareness* dalam menjalankan bisnis.
15. FGD dengan LJK Baru terkait Kegiatan Konglomerasi Keuangan yaitu dengan Sinarmas Insurance Life.
16. FGD terkait Revamping Transaksi Intragrup dengan LJK KK Sinar Mas.
17. Sosialisasi Penerapan PSAK 71 kepada Asuransi Sinarmas.
18. Sosialisasi Pedoman dan Tata Tertib Kerja Komite Kebijakan Perkreditan PT Bank Sinarmas.

## Kecukupan Kebijakan, Prosedur, dan Penetapan Limit

Penerapan Manajemen Risiko di Bank Sinarmas didukung dengan penetapan kerangka yang mencakup kebijakan dan prosedur Manajemen Risiko serta limit risiko secara jelas dan sejalan dengan visi, misi, dan strategi Bisnis Bank serta ketentuan regulator yang berlaku. Bank telah melakukan penetapan limit risiko sesuai dengan kompleksitas bisnis Bank dan melakukan *monitoring* terhadap limit secara periodik.

Bank Sinarmas telah memiliki kebijakan dan prosedur untuk area bisnis yang lebih spesifik, misalnya di bidang perkreditan, *treasury*, dan operasional. Kebijakan dan prosedur tersebut mengatur penetapan limit untuk masing-masing aktivitas, baik pada level portofolio maupun transaksional. Seluruh kebijakan dan prosedur di Bank Sinarmas merupakan bentuk pengelolaan risiko yang melekat pada setiap aktivitas operasional Bank Sinarmas yang dievaluasi dan dimutakhirkan (*update*) secara berkala.

Bank Sinarmas juga telah menetapkan *Risk Appetite & Risk Tolerance* sebagai panduan dalam mengelola limit risiko yang dapat diterima oleh Bank dalam pelaksanaan aktivitas bisnis. *Risk Appetite & Risk Tolerance* dikaji ulang secara berkala setiap tahun sehingga dapat menyesuaikan dengan risiko dan kompleksitas bisnis yang akan dihadapi ke depannya.

6. Sharing discussions related to the Review of Integrated Risk Profile Parameters and the Sinar Mas Financial Conglomeration;
7. Sharing discussions related to the implementation of integrated risk management for Financial Services Institutions (LJK);
8. Socialization of Risk Appetite & Risk Tolerance Review to the Bank's segment and business unit owners;
9. Socialization of Integrated Risk Appetite & Risk Tolerance Formulation to the LJK KK Sinar Mas;
10. Dissemination of Recovery Action Plan to the Board of Directors, Commissioners, and Executive Officers.
11. Socialization of the Role of Risk Management Group (RMG) in Delivering Risk Assessment & Monitoring.
12. Socialization of Bank Stress Testing and Integrated Stress Testing measurements.
13. FGD with all Business Units (BIU) related to the results of risk profile self-assessment as one of the efforts to increase awareness in running the business.
14. FGD with New LJK related to Financial Conglomeration Activities, namely with Sinarmas Insurance Life.
15. FGD related to Intragroup Transaction Revamping with LJK KK Sinar Mas.
16. FGD on Intragroup Transaction Revamping with LJKKK Sinar Mas.
17. Socialization of PSAK 71 Implementation to Sinarmas Insurance.
18. Socialization of Guidelines and Work Rules of Credit Policy Committee of PT Bank Sinarmas.

## Adequacy of Policies, Procedures, and Limit Settings

The implementation of Risk Management at Bank Sinarmas is supported by establishing a framework that includes Risk Management policies and procedures as well as clear risk limits that are in line with the Bank's vision, mission, and business strategies, as well as applicable regulatory provisions. The Bank has set risk limits according to the complexity of the Bank's business and periodically monitors these limits.

Bank Sinarmas has established policies and procedures for more specific business areas, such as credit, treasury, and operations. These policies and procedures regulate the setting of limits for each activity, both at the portfolio and transactional levels. All policies and procedures at Bank Sinarmas represent inherent risk management in every operational activity, which is evaluated and periodically updated.

Bank Sinarmas also sets Risk Appetite & Risk Tolerance as guidelines in managing the acceptable risk limits for the Bank in conducting business activities. Risk Appetite & Risk Tolerance are annually reviewed to adjust to the risks and complexity of future business endeavors.

Guna memastikan kecukupan kebijakan dan prosedur dalam mengidentifikasi risiko serta memastikan kepatuhan kebijakan Bank terhadap ketentuan regulator, maka setiap kebijakan yang akan diterbitkan selalu mendapat kajian terlebih dahulu dari satuan kerja independen, yaitu Satuan Kerja Manajemen Risiko (SKMR) dan Satuan Kerja Kepatuhan (SKK).

## Proses Manajemen Risiko dan Sistem Informasi Manajemen Risiko

Penerapan manajemen risiko Bank berfokus 4 risiko utama, yaitu Risiko Kredit, Risiko Operasional, Risiko Pasar & Risiko Likuiditas, dengan tetap memperhatikan risiko-risiko lainnya, yaitu Risiko Hukum, Risiko Reputasi, Risiko Stratejik dan Risiko Kepatuhan. Proses pelaksanaan manajemen risiko diwujudkan melalui beberapa tahap, mulai dari Proses Identifikasi, Pengukuran, Pemantauan, Pengendalian Risiko, Sistem Informasi Manajemen Risiko, dan Pengelolaan Risiko.

### Proses Identifikasi Risiko

Bank melakukan identifikasi risiko dengan menganalisis seluruh sumber risiko yang diperkirakan muncul dari produk dan aktivitas Bank, serta memastikan bahwa risiko dari produk dan aktivitas baru telah melalui proses manajemen risiko yang layak sebelum diperkenalkan atau dijalankan. SKMR melakukan proses identifikasi risiko menggunakan *risk assessment* untuk memperkirakan potensi risiko yang akan terjadi atas aktivitas transaksi atau produk dan menyampaikan rekomendasi kepada unit bisnis maupun unit kerja terkait lainnya untuk meminimalkan terjadinya potensi risiko tersebut dengan meningkatkan pengendalian internal yang ada dan/atau menambahkan pengendalian internal sebagai perlakuan terhadap potensi risiko. Pelaksanaan proses identifikasi risiko didukung oleh sistem informasi manajemen dan laporan yang akurat dan informatif mengenai kondisi keuangan, kinerja aktivitas fungsional, dan eksposur risiko Bank.

### Pengukuran Risiko

Secara berkelanjutan, Bank telah mengembangkan metodologi dan/atau alat pengukuran risiko, antara lain *credit scoring*, *value at risk* (VaR), pemantauan *portfolio management*, *stress testing*, *credit value adjustment* (CVA), *pre-settlement risk* (PSR), *sharpe ratio*, *present value* 1 (satu) basis poin (PV01), *Interest Rate Risk in Banking Book* (IRRBB), *liquidity coverage ratio* (LCR), *net stable funding ratio* (NSFR), *leverage ratio, maximum cumulative outflow* (MCO), *core funding, risk control self-assessment* (RCSA), *loss event database* (LED), *key risk indicator* (KRI) sebagai pendukung untuk membuat keputusan bisnis yang tepat. Secara periodik, alat pengukuran risiko tersebut senantiasa dikaji ulang dan disesuaikan dengan perkembangan/perubahan yang akan terjadi baik internal maupun eksternal.

### Pemantauan Risiko

Bank melakukan pemantauan risiko secara berkala dengan cara turut serta dalam pemantauan proses pelaksanaan aktivitas bisnis dan operasional, pemberian kajian-kajian serta

To ensure the adequacy of policies and procedures in identifying risks and to ensure the Bank's compliance with regulatory provisions, every policy issued undergoes prior review by independent units, namely the Risk Management Work Unit (SKMR) and the Compliance Work Unit (SKK).

## Risk Management Process and Risk Management Information System

The implementation of the Bank's risk management focuses on four main risks, namely Credit Risk, Operational Risk, Market Risk & Liquidity Risk, but still considering other risks, namely Legal Risk, Reputation Risk, Strategic Risk, and Compliance Risk. The risk management implementation process is manifested through several stages, starting from the Identification, Measurement, Monitoring, Risk Control, Risk Management Information System, and Risk Management stages.

### Risk Identification Process

The Bank conducts risk identification by analyzing all potential sources of risk arising from its products and activities, ensuring that risks associated with new products and activities have undergone appropriate risk management processes before their introduction or implementation. The SKMR conducts the risk identification process using risk assessment to estimate the potential risks that may arise from transaction activities or products and provides recommendations to business units and other relevant units to minimize the occurrence of such potential risks by enhancing existing internal controls and/or adding internal controls as measures against potential risks. The implementation of the risk identification process is supported by management information systems and accurate, informative reports regarding the financial condition, performance of functional activities, and risk exposure of the Bank.

### Risk Measurement

The Bank continuously develops methodologies and/or risk measurement tools, including credit scoring, value at risk (VaR), portfolio management monitoring, stress testing, credit value adjustment (CVA), pre-settlement risk (PSR), sharpe ratio, present value 1 (PV01), liquidity coverage ratio (LCR), net stable funding ratio (NSFR), maximum cumulative outflow (MCO), core funding, risk control self-assessment (RCSA), loss event database (LED), key risk indicators (KRI), to support appropriate business decisionmaking. Periodically, these risk measurement tools are reviewed and adjusted in line with internal and external developments/changes.

### Risk Monitoring

The Bank conducts regular risk monitoring by actively participating in monitoring the implementation process of business and operational activities, providing studies and

rekomendasi yang disampaikan baik kepada manajemen maupun kepada unit kerja, laporan-laporan yang disusun oleh internal SKMR maupun melalui Laporan Eksposur Risiko yang disampaikan oleh unit bisnis dan unit pendukung lainnya secara berkala. Adapun jenis laporan yang disampaikan yaitu berupa hasil pemantauan eksposur risiko beserta dengan rekomendasi dan *action plan* yang disampaikan kepada Direksi dan/atau Komisaris beserta unit kerja.

recommendations to both management and working units, reports prepared by the internal SKMR, as well as through Risk Exposure Reports submitted by business units and other supporting units periodically. The types of reports presented include the results of risk exposure monitoring along with recommendations and action plans submitted to the Board of Directors and/or the Board of Commissioners and working units.

**Pengendalian Risiko**

Seluruh unit kerja Bank Sinarmas melakukan pengendalian eksposur risiko untuk meminimalisir/memitigasi potensi risiko yang dapat terjadi. Pengendalian risiko antara lain dilakukan melalui pelaksanaan pengawasan *dual control* berupa *four eyes principle* untuk seluruh aktivitas bisnis dan operasional Bank Sinarmas. Beberapa bentuk pengendalian internal lainnya antara lain melalui pelaksanaan restrukturisasi kredit, pembentukan CKPN kredit serta *write off* untuk kredit yang bermasalah. Selain itu, Bank juga melakukan pengelolaan untuk menjaga aset dan liabilitas yang dimiliki sehingga dapat memitigasi potensi risiko likuiditas.

**Risk Control**

All units within Bank Sinarmas implement risk exposure controls to minimize/mitigate potential risks. Risk control is carried out through, among others, the implementation of dual control supervision, such as the four eyes principle, for all business and operational activities of Bank Sinarmas. Other forms of internal control include credit restructuring, the establishment of credit allowance for impairment losses (CKPN), and write-offs for nonperforming loans. Additionally, the Bank also manages its assets and liabilities to mitigate potential liquidity risks.

**Sistem Informasi Manajemen Risiko**

Bank memandang bahwa Sistem informasi manajemen risiko merupakan hal penting untuk mendukung pelaksanaan proses identifikasi, pengukuran, pemantauan, dan pengendalian risiko. Sistem informasi yang dimiliki Bank, antara lain program bantu *Enterprise Data Management* untuk mengakomodir kebutuhan data, seperti *monitoring* portofolio kredit dan dana pihak ketiga, program bantu *scoring* kredit dalam rangka menganalisis kelayakan dalam pemberian kredit kepada debitur, pelaksanaan RCSA (*Risk Control Self Assessment*), *loss event database* (LED) untuk mengidentifikasi risiko operasional Bank.

**Risk Management Information System**

The Bank considers that the Risk Management Information System (RMIS) is essential to support the implementation of risk identification, measurement, monitoring, and control processes. The Bank's information system includes an Enterprise Data Management program to accommodate data needs, including monitoring credit portfolios and third-party funds, a credit scoring program to analyze the creditworthiness of debtors, RCSA (Risk Control Self Assessment) implementation, and a Loss Event Database (LED) program to identify operational risks in the Bank.

Bank juga telah mengimplementasikan Sistem *Treasury* (OSTS) yang terintegrasi dengan manajemen risiko. Tujuannya adalah untuk mendukung pelaksanaan proses identifikasi, pengukuran, pemantauan dan pengendalian risiko pada aktivitas *treasury*.

The Bank also implements an Integrated Treasury System (OSTS), which is integrated with risk management. It aims to support the implementation of risk identification, measurement, monitoring, and control processes in treasury activities.

Di samping itu, Bank sudah mengimplementasikan sistem untuk mengakomodir perhitungan rasio LCR, NSFR, *maximum cumulative outflow* (MCO), dan IRRBB serta sedang mengembangkan sistem ATMR Risiko Pasar. Sistem ini akan membantu Bank dalam mengoptimalkan pelaksanaan fungsi pengelolaan Risiko Likuiditas dan Pasar.

In addition, the Bank has implemented a system to accommodate the calculation of LCR, NSFR, maximum cumulative outflow (MCO), and IRRBB ratios and is developing a Market Risk RWA system. This system will assist the Bank in optimizing the implementation of Liquidity and Market Risk management functions.

Bank, selaku Entitas Utama, menyadari pentingnya pengelolaan risiko Konglomerasi Keuangan secara komprehensif serta terintegrasi untuk seluruh Lembaga Jasa Keuangan (LJK) sehingga Bank sedang mengembangkan sistem terkait Konglomerasi Keuangan yang terintegrasi terkait Pelaporan Profil Risiko Terintegrasi, Laporan Kewajiban Penyediaan Modal Minimum, Laporan Transaksi Intragorup, Laporan *Risk Appetite & Risk Tolerance,* serta Laporan *Stress Test* Terintegrasi.

The Bank, as the Main Entity, realizes the importance of managing Financial Conglomerate risk in a comprehensive and integrated manner for all Financial Services Institutions (LJK) so the Bank is developing an integrated Financial Conglomerate related system related to Integrated Risk Profile Reporting, Minimum Capital Adequacy Report, Intragroup Transaction Report, Risk Appetite & Risk Tolerance Report, and Integrated Stress Test Report.

Seluruh sistem informasi manajemen risiko yang dimiliki oleh Bank digunakan untuk menghasilkan laporan atau informasi mengenai eksposur risiko, kepatuhan pelaksanaan manajemen risiko terhadap kebijakan dan prosedur yang disusun serta kepatuhan terhadap penetapan limit. Bentuk laporan yang sudah disampaikan sebagai bagian dari sistem informasi manajemen risiko, antara lain Laporan Tingkat Kesehatan Bank, Laporan Profil Risiko Bank yang disampaikan secara berkala kepada Direksi dan Komite Manajemen Risiko, Laporan Portofolio Kredit, Laporan Portofolio Surat Berharga, Laporan penyediaan dana dan BMPK, Laporan *Monitoring Risk Appetite & Risk Tolerance,* serta Laporan RCSA & LED.

All risk management information systems of the Bank generate reports or information regarding risk exposure, compliance with risk management implementation to the policies and procedures established, as well as compliance with limit setting. The type of report is already provided as part of the risk management information system, including the Bank Soundness Level Report, the Bank Risk Profile Report submitted periodically to the Board of Directors and the Risk Management Committees, Credit Portfolio Reports, Securities Portfolio Reports, funds and BMPK provision Reports, Risk Appetite & Risk Tolerance Monitoring Reports, as well as RCSA & LED Reports.

**Pengelolaan Risiko**

Penyempurnaan penerapan manajemen risiko juga melalui 2 pendekatan, yaitu pengelolaan risiko melalui permodalan dan pengelolaan risiko melalui aktivitas operasional sehingga diharapkan tercapai pengelolaan risiko yang melekat dalam pengelolaan bisnis.

**Risk Management**

The improvement of risk management implementation also involves two approaches: risk management through capital management and risk management through operational activities, aiming to achieve inherent risk management in business management.

1. **Pengelolaan Risiko melalui Permodalan dan Likuiditas Bank**

   Bank memastikan kecukupan modal untuk mengelola (*cover*) risiko kredit, risiko pasar dan risiko operasional, dan risiko likuiditas, baik berdasarkan ketentuan regulator (Otoritas Jasa Keuangan dan *Basel*) maupun kebutuhan internal Bank.

   Terkait dengan *Basel* III, Bank meningkatkan kecukupan permodalan baik secara kualitas maupun kuantitas sesuai dengan ketentuan Otoritas Jasa Keuangan. Implementasi *Basel* III pada Bank Sinarmas telah diterapkan secara bertahap antara lain berupa penguatan modal melalui perhitungan *leverage ratio*, penguatan likuiditas melalui perhitungan rasio *net stable funding ratio* (NSFR) dan *liquidity coverage ratio* (LCR) serta penguatan risiko pasar melalui perhitungan *interest rate risk in banking book* (IRRBB).

1. **Risk Management through the Bank Capital and Liquidity**

   The Bank ensures an adequate capital to manage (cover) credit risk, market risk, and operational risk, both based on regulatory requirements (Financial Services Authority and Basel) and internal Bank needs.

   In terms of Basel III, the Bank has enhanced capital adequacy both qualitatively and quantitatively in accordance with Financial Services Authority regulations. The implementation of Basel III at Bank Sinarmas has been carried out gradually, including capital strengthening through leverage ratio calculation, liquidity strengthening through the calculation of the net stable funding ratio (NSFR) and liquidity coverage ratio (LCR), and market risk strengthening through the calculation of the interest rate risk in the banking book (IRRBB).

2. **Pengelolaan Risiko melalui Aktivitas Operasional**

   Pengelolaan risiko melalui aktivitas operasional ditujukan untuk mengelola risiko kredit, risiko pasar dan risiko likuiditas serta risiko operasional pada level yang dapat diterima. Bank menerapkan *Risk Appetite & Risk Tolerance* dalam bentuk kebijakan dan prosedur serta penetapan batasan risiko maksimal yang akan diambil. Penetapan limit didasarkan atas limit secara keseluruhan, limit per jenis risiko maupun limit per aktivitas fungsional tertentu yang memiliki eksposur risiko. Secara spesifik, untuk pengelolaan Risiko Kredit, Pasar dan Operasional dilakukan melalui *front end*, *middle end* dan *back end* serta melalui penetapan limit-limit. Untuk pengelolaan risiko operasional juga dilakukan oleh seluruh unit kerja terhadap produk dan aktivitas yang dilakukan serta *review* oleh *Risk Management* dan dipastikan keefektifan pelaksanaannya *(assurance)* oleh Internal Audit.

2. **Risk Management through the Operational Activities**

   Risk management through operational activities is aimed at managing credit risk, market risk, liquidity risk, and operational risk at an acceptable level. The Bank implements Risk Appetite & Risk Tolerance in the form of policies and procedures, as well as the determination of maximum risk limits to be taken. The establishment of limits is based on overall limits, limits per type of risk, and limits per specific functional activity with risk exposure. Specifically, the management of Credit, Market, and Operational Risks is conducted through front-end, middle-end, and back-end processes, as well as through the establishment of limits. Operational risk management is also carried out by all work units on products and activities carried out, reviewed by the Risk Management, and the effectiveness of its implementation (assurance) is ensured by the Internal Audit.

## Hasil Review atas Efektivitas Penerapan Manajemen Risiko

Bank senantiasa melakukan *review* atas penerapan manajemen risiko secara berkala. Selain untuk menyesuaikan dengan peraturan perundang-undangan yang ada, hal tersebut juga dilakukan sebagai respons atas dinamika yang terkait dengan bisnis Bank. Pelaksanaan proses *review* antara lain dilaksanakan secara menyeluruh, baik untuk proses identifikasi, pengukuran, pemantauan dan pengendalian risiko. Selain itu, sistem informasi manajemen risiko juga merupakan hal penting yang dikembangkan dalam rangka mendukung proses penerapan manajemen risiko. Salah satunya dengan adanya implementasi Sistem *Treasury* (OSTS) yang terintegrasi dengan manajemen risiko. Tujuannya adalah untuk mendukung pelaksanaan proses identifikasi, pengukuran, pemantauan, dan pengendalian risiko pada aktivitas *treasury*.

## Review Results on the Effectiveness of Risk Management Implementation

The Bank consistently conducts periodic reviews of risk management implementation. In addition to adjusting to existing regulations, the review is also conducted to respond to dynamics related to the Bank's business. The review process is carried out comprehensively, covering risk identification, measurement, monitoring, and control processes. Furthermore, risk management information systems are also crucially developed to support the risk management implementation process. One of them is through the implementation of the Treasury System (OSTS), which is integrated with risk management. It aims to support the implementation of risk identification, measurement, monitoring, and control processes in treasury activities.

## Pernyataan Direksi dan/atau Dewan Komisaris atau Komite Audit atas Kecukupan Manajemen Risiko

Dalam organisasi manajemen risiko, Dewan Komisaris dan Direksi berperan melakukan pengawasan terhadap pelaksanaan di Bank. Dalam melaksanakan tugas dan fungsinya, Dewan Komisaris juga dibantu oleh organ di bawahnya, termasuk di antaranya Komite Audit.

Kebijakan internal Bank terkait dengan manajemen risiko telah mengacu peraturan perundang-undangan yang berlaku, termasuk ketentuan *Basel Committee on Banking Supervision* (BCBS). Mengacu pada peraturan-peraturan tersebut, Bank juga memiliki mekanisme *review* yang dilakukan secara berkala terhadap efektivitas penerapan manajemen risiko.

Melalui berbagai pertimbangan tersebut, Direksi dan Dewan Komisaris memandang bahwa kecukupan manajemen risiko Bank hingga tahun 2024 telah memadai di mana penerapan kerangka manajemen risiko juga senantiasa diselaraskan dengan perkembangan kondisi bisnis Bank, maupun faktor-faktor lain yang mempengaruhnya.

## Statement of the Board of Directors and/or Board of Commissioners or Audit Committee on the Adequacy of Risk Management System

In a risk management organization, the Board of Commissioners and the Board of Directors play a role in supervising the implementation within the Bank. In carrying out their duties and functions, the Board of Commissioners is also assisted by its subordinates, including the Audit Committee.

The Bank's internal policies related to risk management are referred to applicable laws and regulations, including the provisions of the Basel Committee on Banking Supervision (BCBS). Referring to these regulations, the Bank also has a mechanism for periodic reviews to assess the effectiveness of risk management implementation.

Through various considerations, the Board of Directors and the Board of Commissioners consider that the adequacy of the Bank's risk management until 2024 was sufficient, where the implementation of the risk management framework was continuously aligned with the development of the Bank's business conditions, as well as other influencing factors.

## Pengungkapan Eksposur Permodalan dan Risiko

## Capital and Risk Exposure Disclosure

### PERMODALAN

### CAPITAL

**Penjelasan Kualitatif**

Bank Sinarmas telah menjaga soliditas struktur permodalan yang berasal dari Modal Inti (*Tier* I). Pada tahun 2024, seluruh kebutuhan permodalan Bank Sinarmas dapat terpenuhi dari pertumbuhan modal secara organik dengan didukung oleh kinerja keuangan Bank yang sehat.

**Qualitative Explanation**

Bank Sinarmas has maintained the solidity of its capital structure derived from Tier I Capital. In 2024, all capital needs of Bank Sinarmas were met through organic capital growth supported by the Bank's healthy financial performance.

## Struktur Permodalan

Sesuai dengan ketentuan Otoritas Jasa Keuangan, struktur permodalan Bank Sinarmas terdiri dari:

### Modal Inti (*Tier* 1)

Modal Inti (*Tier* 1), terdiri dari Modal Inti Utama (*Common Equity Tier* - CET 1) dan Modal Inti Tambahan (*Additional Tier* 1). Modal inti utama mencakup modal disetor, cadangan tambahan modal (*disclosure 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).

### Modal Pelengkap (*Tier* 2)

Modal Pelengkap (*Tier* 2) meliputi Instrumen modal dalam bentuk saham atau lainnya yang memenuhi persyaratan *Tier* 2, Cadangan umum PPA atas aset produktif yang wajib dibentuk (paling tinggi 1,25% ATMR Risiko Kredit) serta Penempatan dana pada instrumen *Tier* 2 pada bank lain.

Pemenuhan struktur modal Bank Sinarmas di tahun 2024 dan 2023, diungkapkan sebagai berikut.

## Capital Structure

In line with Financial Services Authority Regulation, the capital structure of Bank Sinarmas consists of:

### Core Capital (Tier 1)

Core Capital (Tier 1) consists of Common Equity Tier 1 (CET 1) and Additional Core Capital (Additional Tier 1). Common Equity Tier 1 comprises paid-up capital, additional capital reserves (disclosure reserve), and deductions from Common Equity Tier 1 capital. Additional capital reserves consist of additional factors (other comprehensive income and other additional capital reserves) and deducting factors (other comprehensive income and other additional capital reserves).

### Supplementary Capital (Tier 2)

The supplementary Capital (Tier 2) consists of capital instruments in the form of shares or others that meet Tier 2 requirements, PPA general reserves for earning assets that must be formed (maximum 1.25% of Credit Risk RWA), and placement of funds in Tier 2 instruments at other banks.

The fulfillment of Bank Sinarmas' capital structure in 2024 and 2023 is disclosed as follows.

dalam jutaan Rupiah | in million Rupiah

| Jenis Modal<br>Types of Capital | 2024 | 2023 |
|---|---|---|
| Modal Inti (*Tier* 1)<br>Core Capital (Tier 1) | 6.930.875 | 7.283.216 |
| Modal Pelengkap (*Tier* 2)<br>Supplementary Capital (Tier 2) | 641.610 | 711.607 |
| **Total Modal**<br>**Total Capital** | **7.572.485** | **7.994.823** |

## Kecukupan Permodalan

Bank Sinarmas telah melakukan pengelolaan modal sesuai dengan regulasi Bank Indonesia dan Otoritas Jasa Keuangan (*Basel* II dan *Basel* III) dalam rangka memastikan bahwa Bank dapat menjaga kecukupan modalnya untuk men-*cover* risiko-risiko utama pada kegiatan perbankan, yaitu Risiko Kredit, Risiko Pasar dan Risiko Operasional, dengan tetap memberikan *return* bagi pemangku kepentingan.

Untuk perhitungan kecukupan modal dengan memperhitungkan risiko kredit, risiko pasar, dan risiko operasional, Bank Sinarmas telah menyesuaikan dengan ketentuan regulator terkait menggunakan Pendekatan Standar *Basel* (*Standardized Approach*).

Bank Sinarmas memiliki tingkat permodalan yang memadai dengan rasio kecukupan modal (*capital adequacy ratio*/ CAR) sebesar 31,26% pada Desember 2024. Posisi tersebut di atas persyaratan minimum sesuai profil risiko yang ditetapkan oleh regulator, sehingga sangat memadai untuk mendukung rencana bisnis Bank yang diimbangi dengan upaya dalam mengantisipasi seluruh risiko yang dihadapi.

## Capital Adequacy

Bank Sinarmas has managed its capital in accordance with Bank Indonesia and the Financial Services Authority regulations (Basel II and Basel III) to ensure that the Bank can maintain its capital adequacy to cover key risks in banking activities, namely Credit Risk, Market Risk, and Operational Risk, while still providing returns to stakeholders.

In terms of the calculation of capital adequacy considering credit risk, market risk, and operational risk, Bank Sinarmas has adjusted according to the relevant regulatory requirements using the Basel Standardized Approach.

Bank Sinarmas has adequate capital with a capital adequacy ratio (CAR) of 31.26% as of December 2024. This position is above the minimum requirements according to the risk profile set by the regulator; thus, it is highly sufficient to support the Bank's business plans balanced with efforts to anticipate all faced risks.

Selain perhitungan tersebut, Bank Sinarmas juga memperhitungkan kecukupan permodalan dengan mengacu kepada Pilar 2 *Basel* II atau yang lebih dikenal dengan pendekatan *internal capital adequacy assessment process* (ICAAP). Sesuai dengan peringkat profil risiko Bank, maka perhitungan ICAAP Bank dijaga minimal sebesar 10%-11% atau sesuai dengan ketentuan regulator.

Sebagaimana yang disyaratkan oleh regulator, Bank Sinarmas wajib membentuk tambahan modal sebagai penyangga (*buffer*) selain menyediakan modal minimum sesuai profil risiko. Tambahan modal sesuai ketentuan regulator yang dibentuk Bank Sinarmas adalah berupa *countercyclical buffer*, yaitu yang berfungsi sebagai penyangga (*buffer*) untuk mengantisipasi kerugian apabila terjadi pertumbuhan kredit perbankan yang berlebihan sehingga berpotensi mengganggu stabilitas sistem keuangan. Sesuai dengan regulasi terkait pemenuhan *buffer* tersebut, maka persentase *buffer* yang wajib dipenuhi oleh Bank Sinarmas yaitu berupa *countercyclical buffer* sebesar 0% dan *capital conservation buffer* sebesar 2,5%.

## RISIKO

### Penilaian Profil Risiko

Peringkat risiko komposit Bank Sinarmas per 31 Desember 2024, yaitu berada pada peringkat 2 (dua) atau *Low to Moderate* dengan tren stabil dengan penilaian risiko melekat (*inheren risk*) pada peringkat 2 (dua) atau *Low to Moderate* dan Kualitas Penerapan Manajemen Risiko (KPMR) pada peringkat 2 (dua) atau *Satisfactory*.

### Profil Risiko

#### Risiko Kredit

Risiko kredit adalah risiko yang timbul akibat kegagalan debitur/pihak lawan (*counterparty*) serta pihak lainnya dalam memenuhi kewajibannya ketika jatuh tempo. Berbagai kewajiban ini dapat timbul dari beragam aktivitas fungsional penyediaan dana, seperti perkreditan, *treasury*, investasi, dan pembiayaan perdagangan (*trade finance*).

Proses pengelolaan kredit Bank Sinarmas diawali dengan menentukan target pasar dalam menyalurkan kredit dengan mengacu pada *risk acceptance criteria* dan dilanjutkan dengan melakukan *risk assessment & monitoring* atas pemberian kredit. Dalam menyalurkan kredit, Bank Sinarmas senantiasa mengedepankan prinsip kehati-hatian di mana seluruh aktivitas pengelolaan kredit akan dianalisis oleh Unit *Credit Analyst* yang terpisah dengan unit bisnis dan unit risiko kredit yang independen. Bank Sinarmas senantiasa berpedoman pada Kebijakan Perkreditan Bank Sinarmas serta ketentuan yang ditetapkan oleh regulator dalam mengelola risiko kredit secara *end-to-end*.

In addition to those calculations, Bank Sinarmas also considers capital adequacy in reference to Pillar 2 of Basel II, known as the Internal Capital Adequacy Assessment Process (ICAAP). According to the Bank's risk profile rating, the minimum maintained ICAAP calculation is 10%-11%, or as per regulatory requirements.

As required by the regulator, Bank Sinarmas is obliged to form additional capital as a buffer in addition to providing minimum capital according to the risk profile. The additional capital as stipulated by the regulator formed by Bank Sinarmas is in the form of a countercyclical buffer, which serves as a buffer to anticipate losses due to excessive growth in banking credit that could potentially disrupt financial system stability. In accordance with regulations regarding the fulfillment of these buffers, the mandatory percentage of buffers to be met by Bank Sinarmas consists of a countercyclical buffer of 0% and a capital conservation buffer of 2.5%.

## RISK

### Risk Profile Assessment

The composite risk rating of Bank Sinarmas as of December 31, 2024, is ranked 2 (Low to Moderate) with a stable trend, inherent risk assessment at level 2 or Low to Moderate, and the Quality of Risk Management Implementation (KPMR) at level 2 or Satisfactory.

### Risk Profile

#### Credit Risk

Credit risk is the risk arising from the failure of the debtor/counterparty and other parties to fulfill their maturing obligation. These various obligations can arise from a variety of functional activities related to fund provision, such as credit, treasury, investment, and trade finance.

The credit management process at Bank Sinarmas begins with identifying the target market for credit disbursement by referring to risk acceptance criteria and then proceeds with conducting risk assessment and monitoring for credit provision. In disbursing credit, Bank Sinarmas always prioritizes prudential principles, where all credit management activities will be analyzed by a separate Credit Analyst Unit independent from business units and credit risk units. Bank Sinarmas consistently adheres to the Bank's Credit Policy as well as regulations established by regulators in managing credit risk end-to-end.

**1. Penerapan Manajemen Risiko Kredit**

a. Struktur Organisasi Manajemen Risiko Kredit

Satuan Kerja Manajemen Risiko dalam menjalankan wewenang dan tanggung jawabnya melakukan fungsi pengawasan yang independen dari aktivitas bisnis serta melakukan identifikasi, pengukuran, pemantauan, dan pengendalian risiko dan menyampaikan laporan atas tingkat risiko. Organisasi manajemen risiko kredit Bank Sinarmas menerapkan sistem *four eyes principle* sebagai salah satu pengendalian Risiko Kredit pada proses pemberian kredit pada segmen *Corporate, Channeling /Joint Financing*, *Financial Institution*, *Commercial, Micro, Small Medium Enterprise (SME),* dan *Consumer*.

b. Strategi Manajemen Risiko Kredit

1) Bank telah menetapkan prosedur dan kebijakan kredit, pengaturan limit, tingkat risiko yang diambil (risk appetite) dan toleransi risiko (risk tolerance) serta melakukan pemantauan dan evaluasi secara berkala untuk memastikan bahwa seluruh risiko yang mungkin timbul dari proses pemberian kredit dapat dimitigasi dengan penerapan prinsip *"four eyes principles"* secara konsisten. Satuan Kerja Manajemen Risiko melakukan penilaian risiko memberikan rekomendasi secara independen terhadap eksposur dan limit kredit serta mengidentifikasi besaran risiko yang melekat pada produk dan aktivitas yang terkait dengan perkreditan.

2) Bank juga melakukan *assessment* dan *monitoring* dengan memperhatikan konsep *one obligor*, pemantauan konsentrasi kredit berdasarkan sektor ekonomi, debitur inti, penyediaan dana kepada pihak terkait (*related party*), pihak tidak terkait serta penyediaan dana besar dengan melakukan analisis secara komprehensif dan *risk assessment* diberikan dari SKMR serta Internal Audit sebagai Unit Independen, serta dalam pelaksanaannya, Bank memastikan portofolio kredit tidak terkonsentrasi pada kelompok atau individu tertentu serta tidak terdapat pelampauan atau pelanggaran batas maksimum pemberian kredit (BMPK) dengan mematuhi ketentuan regulator atas penyediaan dana kepada pihak terkait dan kepada pihak tidak terkait.

3) Pemantauan terhadap perkembangan portofolio kredit Bank dilakukan secara intensif sehingga memungkinkan Bank untuk melakukan tindakan pencegahan secara tepat waktu dengan implementasi *early warning* sebagai upaya mendeteksi debitur yang berpotensi terjadi penurunan kualitas kredit. Pemantauan portofolio kredit Bank disusun berdasarkan jenis penggunaan, sektor ekonomi, debitur inti, jenis fasilitas, kategori debitur, jenis mata uang, geografis, cabang dan lainnya. Laporan perkembangan portofolio tersebut disampaikan kepada Direksi secara berkala.

**1. Implementation of Credit Risk Management**

a. Organizational Structure of Credit Risk Management

In carrying out its authority and responsibilities, the Risk Management Work Unit performs independent supervisory functions of business activities and conducts identification, measurement, monitoring, and control of risks, as well as reports on the risk levels. The credit risk management organization of Bank Sinarmas implements the four eyes principle system as one of the credit risk controls in the process of granting credit for Corporate, Channeling/Joint Financing, Financial Institution, Commercial, Micro, Small Medium Enterprise (MSME), and Consumer segments.

b. Credit Risk Management Strategy

1) The Bank has determined credit procedures and policies, set credit limits, determined the risk appetite, defined the risk tolerance, and conducted regular monitoring and evaluation to ensure that all risks arising from the credit granting process can be mitigated through consistent application of the "four-eyes principle." The Risk Management Work Unit conducts risk assessments, provides independent recommendations on exposure and credit limits, and identifies the inherent risks associated with products and activities related to credit.

2) The Bank also conducts assessments and monitoring while considering the concept of one obligor, monitoring credit concentration based on economic sectors, core debtors, and funding provided to related parties, unrelated parties, and large fund providers by conducting comprehensive analysis and risk assessment provided by the SKMR and the Internal Audit as an Independent Unit. In its implementation, the Bank ensures that the credit portfolio is not concentrated in specific groups or individuals and no breaches or violations of the maximum credit limits (BMPK) by adhering to regulatory provisions regarding funding provided to related and unrelated parties.

3) Monitoring of the Bank's credit portfolio development is conducted intensively, allowing the Bank to take preventive actions in a timely manner with the implementation of early warning systems to detect potential deterioration in credit quality. The Bank's credit portfolio monitoring is organized based on usage types, economic sectors, core debtors, facility types, debtor categories, currency, geographic regions, branches, and others. Progress reports on the portfolio development are regularly submitted to the Board of Directors.

4) Dalam rangka memenuhi ketentuan regulator sehubungan dikeluarkannya kebijakan rasio pembiayaan inklusif makroprudensial (RPIM) dalam sektor pembiayaan inklusif dan usaha mikro, kecil dan menengah (UMKM), maka pada tahun 2024 Bank tetap berkomitmen fokus kepada penyaluran kredit pada segmen usaha kecil dan menengah (UMKM) dan realisasi pencapaian rasio RPIM posisi 31 Desember 2024 belum memenuhi *target risk appetite* dan *risk tolerance* yang ditetapkan.
5) Untuk akselerasi proses persetujuan kredit pada segmen MSME, Bank menggunakan *credit scoring* sebagai alat bantu komite untuk menilai kelayakan calon debitur dalam memperoleh pinjaman untuk membuat keputusan persetujuan secara cepat, efisien, dan obyektif.
6) Pemantauan terhadap portofolio kredit MSME dilakukan secara harian oleh unit bisnis dalam bentuk laporan harian yang disampaikan kepada unit-unit mikro. Laporan tersebut digunakan sebagai *dashboard* bagi unit-unit mikro sehingga dapat sedini mungkin melakukan tindak lanjut penanganan terhadap debitur-debitur yang mulai menunggak.
7) Perkembangan teknologi yang cepat dan dinamis seta dorongan dari pandemi, maka sejak tahun 2021, Bank telah melakukan akselerasi transformasi digital dengan pengembangan sistem untuk penyaluran kredit dilakukan melalui aplikasi secara digital (*digital loan*), di mana dibangun *credit risk engine* sebagai *underwriting system* untuk membantu menganalisis dan menilai kelayakan calon debitur untuk menerima pinjaman dari Bank. Bank melakukan pengembangan model risiko berupa *credit scoring* dan secara periodik dilakukan analisa *performance monitoring*, kalibrasi model dan validasi atas *scoring model* pada setiap produk *digital loan* untuk menjaga keandalan dan validitas model.
8) Dengan adanya pencabutan status pandemi Covid-19 oleh Pemerintah sesuai dengan Keppres No. 17 Tahun 2023 pada Juni 2023 yang menyatakan status pandemi Covid-19 di Indonesia dinyatakan telah berakhir, Bank telah mencabut beberapa ketentuan terkait penyaluran kredit terdampak Covid-19. Namun Bank masih terus melakukan pemantauan secara ketat pada debitur yang sebelumnya direstrukturisasi karena pandemi Covid-19 demi menjaga kualitas kredit tetap baik.

c. Pengelolaan Risiko Konsentrasi Kredit

Dalam hal mengelola portofolio kredit, Bank memperhatikan dan melakukan evaluasi dalam pelaksanaan diversifikasi penyaluran kredit serta dalam hal mengelola risiko Konsentrasi Kredit. Bank senantiasa melakukan *monitoring* untuk memastikan tidak terdapat pelampauan limit dan kualitas kredit

4) In order to comply with regulatory requirements regarding the issuance of the Macroprudential Inclusive Financing Ratio (RPIM) policy in the inclusive financing sector and micro, small, and medium enterprises (MSMEs), in 2024, the Bank was committed to focusing on credit to the small and medium enterprise (SME) segment. The realization of the RPIM ratio as of December 31, 2024, met the target risk appetite and risk tolerance set by the Bank.
5) For accelerating the credit approval process in the MSME segments, the Bank utilizes credit scoring as a tool to assist the committee in assessing the eligibility of potential borrowers to make approval decisions quickly, efficiently, and objectively.
6) Monitoring of the MSME credit portfolios is conducted daily by the business units in the form of daily reports submitted to micro units. These reports serve as dashboards for the micro units, enabling them to take early action in handling borrowers who are starting to fall behind.
7) Due to rapid and dynamic technological developments along with the pandemic, since 2021, the Bank has accelerated digital transformation efforts with the development of a system for credit disbursement through digital applications (digital loans). A credit risk engine has been built as an underwriting system to assist in analyzing and assessing the eligibility of prospective borrowers to receive loans from the Bank. The Bank develops risk models such as credit scoring and periodically conducts performance analysis, model calibration, and validation of scoring models for each digital loan product to maintain the reliability and validity of the model.
8) With the revocation of the Covid-19 pandemic status by the Government in accordance with Presidential Decree No. 17 of 2023 in June 2023, which stated that the status of the Covid-19 pandemic in Indonesia was declared over, the Bank revoked several provisions related to the distribution of loans affected by Covid-19. However, the Bank continues to closely monitor debtors who were previously restructured due to the COVID-19 pandemic in order to maintain good credit quality.

c. Credit Concentration Risk Management

In managing the credit portfolio, the Bank highlights and evaluates the implementation of credit disbursement diversification as well as Credit Concentration Risk Management. The Bank consistently carries out monitoring to ensure there are no breaches of limits and credit quality is maintained in accordance with

terjaga sesuai *risk appetite* dan *risk tolerance*. Bank melakukan pengelolaan risiko konsentrasi kredit dengan menentukan limit disesuaikan dengan kebutuhan dan tingkat risiko yang diambil dengan memperhatikan *risk appetite* dan *risk tolerance* serta memperhitungkan dampak risikonya, antara lain menetapkan batasan pemberian kredit kepada satu debitur/grup sesuai dengan regulasi terkait batas maksimum pemberian kredit (BMPK) limit sektor ekonomi kredit dan surat berharga, debitur inti, rasio NPL (*gross, net* dan per segmentasi), CKPN untuk NPL, CKPN untuk NPL Bank, CKPN NPL Collective, CKPN NPL Individual dan rasio pembiayaan inklusif makroprudensial (RPIM). Pemantauan terhadap risiko konsentrasi tersebut dilakukan secara bulanan. Dalam penetapan limit risiko konsentrasi tersebut Bank telah mempertimbangkan kondisi historis, Statistik Perbankan, Ketentuan Regulator, Modal Bank, *Peers/Bank Benchmarking* dan rencana Portofolio Bank yang ditetapkan sesuai dengan Rencana Bisnis Bank.

d. Pengukuran dan Pengendalian Risiko Kredit

1) Pengukuran Risiko Kredit

Dalam mengukur beban modal atas Risiko Kredit, Bank menggunakan metode standar sesuai yang diatur dalam Surat Edaran Otoritas Jasa Keuangan No. 24/SEOJK.03/2021 tentang Perhitungan Aset Tertimbang Menurut Risiko Untuk Risiko Kredit dengan Menggunakan Pendekatan Standar Bagi Bank Umum. Penilaian terhadap Profil Risiko Kredit juga dilakukan secara berkala untuk mengukur risiko yang melekat serta kecukupan penerapan manajemen risiko. Risiko yang melekat diukur dengan menggunakan sejumlah parameter yang mencakup antara lain komposisi portofolio aset dan tingkat konsentrasi, kualitas penyediaan dana dan kecukupan pencadangan, strategi penyediaan dana dan sumber timbulnya penyediaan dana dan faktor eksternal.

Secara berkala, Bank melakukan *stress testing* dengan berbagai skenario dan *review* terhadap faktor dan parameter dalam *stress* testing guna mengukur seberapa besar potensi kenaikan *non-performing loan* yang dialami Bank dan potensi penambahan pembentukan CKPN, serta untuk mengukur kemampuan ketahanan permodalan dan CAR Bank dalam mengatasi kondisi ekstrim yang mungkin terjadi akibat perubahan kondisi ekonomi yang memburuk. Hal ini dilakukan untuk mendapatkan informasi yang diperlukan dalam upaya mitigasi risiko yang paling tepat dan akurat. Hasil *Stress Testing* secara umum menunjukkan Bank Sinarmas memiliki permodalan dan likuiditas yang kuat dalam mengantisipasi estimasi kerugian dari potensi risiko yang dihadapi dalam skenario terburuk.

risk appetite and risk tolerance. The Bank manages credit concentration risk by setting limits adjusted to needs and the level of risk taken by considering risk appetite and risk tolerance, as well as considering its impact. This includes establishing limits on credit provision to a single debtor/group in accordance with regulations related to the maximum credit limit (BMPK), limits on economic sectors, core debtors, NPL ratios (gross, net, and segmented), allowance for impairment losses (CKPN) for NPL, CKPN for Bank NPL, Collective NPL CKPN, Individual NPL CKPN, and the Macroprudential Inclusive Financing Ratio (RPIM). Monitoring of concentration risks is conducted every month. In setting these concentration risk limits, the Bank has considered historical conditions, banking statistics, regulatory provisions, the Bank's capital, Peers/Bank benchmarking, and the Bank's portfolio plan established in line with the Bank's business plan.

d. Credit Risk Measurement and Control

1) Credit Risk Measurement

In measuring the capital charge for Credit Risk, the Bank utilizes the standard method as regulated in Financial Services Authority Circular No. 24/SEOJK.03/2021 on the Calculation of Risk-Weighted Assets for Credit Risk Using the Standard Approach for Commercial Banks. Assessment of the Credit Risk Profile is also conducted periodically to measure inherent risks and the adequacy of risk management implementation. Inherent risks are measured using several parameters, including portfolio asset composition and concentration levels, the quality of the provision of funds and the adequacy of reserves, the strategy of funding provision and sources, and external factors.

The Bank periodically conducts stress testing with various scenarios and reviews factors and parameters within stress testing to measure the potential increase in non-performing loans experienced by the Bank and the potential addition of the allowance for impairment losses (CKPN) formation, as well as to measure the capital resilience and CAR of the Bank's ability to cope with extreme conditions that may arise due to worsening economic conditions. This is conducted to obtain the necessary information for the most appropriate and accurate risk mitigation efforts. The results of stress testing generally indicate that Bank Sinarmas has robust capital and liquidity to anticipate estimated losses from potential risks that could arise in the worst scenario.

2) Pengendalian Risiko Kredit
Bank mengembangkan serta menerapkan *risk governance* sebagai bagian dalam pengendalian internal perkreditan sebagai berikut.
a) Lini pertama (pilar bisnis dan pendukung) terutama bertanggung jawab mengelola risiko kredit yang merupakan bagian dari aktivitasnya sehari-hari.
b) Lini kedua menyediakan sumber daya yang diperlukan untuk mengembangkan kerangka kerja risiko kredit, kebijakan, metodologi dan perangkat risiko kredit dalam pengelolaan risiko kredit yang bersifat material secara *bank wide*.
c) Lini ketiga merupakan audit internal dan kontrol internal, yang secara independen bertugas untuk melakukan pemeriksaan terhadap kepatuhan, kecukupan dan efektivitas proses manajemen risiko kredit.

3) Dalam menjalankan fungsi manajemen risiko kredit, proses persetujuan kredit telah diatur dalam kebijakan bank, yaitu dengan menetapkan wewenang di cabang-cabang, kantor wilayah, dan kantor pusat sehingga memungkinkan proses pengambilan keputusan kredit yang optimal. Seiring dengan bertumbuhnya perkreditan Bank, maka untuk mendukung efektivitas dan efisiensi dalam pengajuan permohonan kredit serta mempercepat pelaksanaan proses persetujuan kredit, Bank menggunakan suatu program bantu yang dikenal dengan PEGA yang terus dikembangkan dan disempurnakan dalam proses pengajuan kredit *commercial*, MSME, dan *consumer* dengan menerapkan parameter-parameter risiko secara menyeluruh.

4) Bank telah memiliki *Loan Recovery Group* yang khusus menangani debitur/nasabah yang mengalami kesulitan untuk memenuhi kewajibannya. *Loan Recovery Group* telah memperluas struktur organisasi, menambah sumber daya manusia dan menyusun beberapa strategi agar upaya penyehatan dan/atau penyelamatan kredit bermasalah dapat dijalankan lebih fokus dan termonitor. Dengan begitu, penanganan dapat lebih intensif dan kualitas kredit Bank tetap terjaga serta *recovery rate* atas penanganan kredit bermasalah meningkat. Tata cara dan pedoman untuk melaksanakan penyehatan dan/atau penyelamatan kredit bermasalah juga telah diatur dalam kebijakan internal Bank dan dilakukan *review* secara berkala.

5) Sebagai langkah mitigasi risiko kredit, Bank juga mewajibkan debitur untuk memberikan agunan yang memenuhi persyaratan Bank. Jenis agunan yang diterima Bank sebagai agunan kredit, antara lain berupa *cash collateral*, *fixed asset*, mesin, kendaraan bermotor, persediaan,

2) Credit Risk Control
The Bank develops and implements risk governance as part of credit internal control as follows:
a) The first line (business and support pillars) is primarily responsible for managing credit risk, which is part of its daily activities.
b) The second line provides the necessary resources to develop the credit risk framework, policies, methodologies, and credit risk tools in managing material credit risks across the bank-wide scope.
c) The third line consists of internal audit and internal control, which independently examine compliance, adequacy, and effectiveness of the credit risk management processes.

3) In carrying out the credit risk management function, the credit approval process has been regulated in the Bank's policy by assigning authorities at branches, regional offices, and head offices to enable an optimal credit decision-making process. Along with the Bank's credit growth, to support effectiveness and efficiency in loan applications and expedite the credit approval process, the Bank utilizes an assisting program known as PEGA, which is continuously developed and refined in the commercial, MSME, and consumer credit application processes by applying comprehensive risk parameters.

4) The Bank has established a Loan Recovery Group specifically tasked with handling borrowers/customers experiencing difficulties in meeting their obligations. The Loan Recovery Group has expanded its organizational structure, increased human resources, and developed several strategies to ensure that efforts to restructure and/or recover non-performing loans can be more focused and monitored. Therefore, handling can be conducted more intensively while maintaining the Bank's credit quality, and the recovery rate for handling non-performing loans increases. Restructure and/or recovery of non-performing loans implementation procedures and guidelines have also been regulated in the Bank's internal policies and are regularly reviewed.

5) The Bank also requires debtors to provide collateral that complies with the Bank's requirements as a credit risk mitigation measure. Cash collateral, fixed assets, machinery, motor vehicles, inventories, stocks, and other types of collateral are among those that the Bank accepts

saham dan lainnya sesuai dengan kebijakan yang berlaku. Perkiraan nilai wajar dari agunan berdasarkan penilaian dari internal maupun eksternal tergantung dari nilai *plafond* yang diajukan calon debitur.

6) Pelaksanaan proses manajemen risiko dituangkan dalam Laporan Profil Risiko, Laporan Pemantauan, Laporan Kaji Ulang Limit *Risk Appetite* dan *Risk Tolerance*, dan Laporan BMPK dan laporan lainnya

**2. Pendekatan Bank untuk Pembentukan Cadangan Kerugian Penurunan Nilai (CKPN)**

Sejak Januari 2020, Bank telah mengimplementasikan PSAK 71 dalam pembentukan *impairment* kredit sesuai dengan penetapan Dewan Standar Akuntansi Keuangan Ikatan Akuntan Indonesia (DSAK IAI). Bank bekerja sama dengan konsultan telah membangun infrastruktur dan sistem teknologi informasi yang dapat melakukan *classification & measurement*, perhitungan *impairment* (*collective & individual*), serta *disclosure reporting*. Cakupan penurunan nilai berdasarkan PSAK 71 (IFRS 9) telah memperhitungkan kerugian di masa mendatang (*expected credit loss*).

Berbeda dengan PSAK 50/55 sebelumnya yang mengakui kerugian kredit pada saat peristiwa kerugian kredit terjadi, metode yang diperkenalkan pada PSAK 71 ini mensyaratkan pengakuan segera atas dampak perubahan kerugian kredit ekspektasi setelah pengakuan awal aset keuangan. PSAK 71 memperkenalkan metode kerugian kredit ekspektasi (*expected credit loss*/ECL) dalam mengukur kerugian instrumen keuangan akibat penurunan nilai instrumen keuangan.

Cadangan kerugian penurunan nilai (CKPN) dengan menggunakan metode *expected credit loss* sesuai dengan ketentuan PSAK 71 (IFRS 9) menghitung penurunan nilai pada Portofolio (1) Kredit; (2) *Treasury*; (3) *Trade Finance,* baik untuk *On* B/S maupun *Off* B/S - secara bulanan, yang dicatat pada biaya perolehan diamortisasi atau pada nilai wajar melalui penghasilan komprehensif lain, ditambah piutang sewa, aset kontrak, komitmen pinjaman, dan kontrak jaminan keuangan yang tidak diukur pada nilai wajar melalui laba rugi.

Tujuan dari persyaratan penurunan nilai adalah untuk mengakui kerugian kredit ekspektasi sepanjang umurnya atas semua instrumen keuangan yang telah mengalami peningkatan risiko kredit secara signifikan sejak pengakuan awal, baik dinilai secara individu atau kolektif, dengan mempertimbangkan semua informasi yang wajar dan didukung informasi yang bersifat perkiraan masa depan (*forward-looking*).

as credit collateral in accordance with applicable policies. The estimated fair value of the collateral is based on internal and external assessments, depending on the ceiling value proposed by the prospective debtor.

6) The implementation of risk management processes is documented in Risk Profile Reports, Monitoring Reports, Risk Appetite and Risk Tolerance Limit Review Reports, BMPK Reports, and other reports.

**2. Bank's Approach to the formation of Allowance for Impairment Losses (CKPN)**

Since January 2020, the Bank has implemented PSAK 71 in establishing credit impairment in accordance with the stipulation of the Board of Financial Accounting Standards of the Institute of Indonesia Chartered Accountants (DSAK IAI). In collaboration with consultants, the Bank has built infrastructure and information technology systems that can carry out Classification & Measurement, impairment calculations (collective & individual), and disclosure reporting. The coverage for impairment losses under PSAK 71 (IFRS 9) has considered future losses (expected credit loss).

Unlike the previous PSAK 50/55, which recognized credit losses when a credit loss event occurred, the method introduced in PSAK 71 requires immediate recognition of the impact of changes in expected credit losses after initial recognition of financial assets. PSAK 71 introduces the Expected Credit Loss (ECL) method in measuring financial instrument losses due to a decrease in the value of financial instruments.

The Allowance for Impairment Losses (CKPN) using the expected credit loss method in line with PSAK 71 (IFRS 9) provision that calculates impairment on the Portfolio (1) Credit; (2) Treasury; (3) Trade Finance, both On-Balance Sheet and Off-Balance Sheet - monthly, which is recorded in amortized cost or fair value through other comprehensive income, plus lease receivables, contract assets, loan commitments, and financial guarantee contracts not measured at fair value through profit or loss.

The objective of impairment requirements is to recognize lifetime expected credit losses for all financial instruments that have experienced a significant increase in credit risk since initial recognition, whether assessed individually or collectively, considering all reasonable and supported forward-looking information.

Bank Sinarmas mengukur penyisihan kerugian instrumen keuangan sejumlah kerugian kredit ekspektasi sepanjang umurnya, jika risiko kredit atas instrumen keuangan tersebut telah meningkat secara signifikan sejak pengakuan awal. Jika pada tanggal pelaporan, risiko kredit atas instrumen keuangan tidak meningkat secara signifikan sejak pengakuan awal, entitas mengukur penyisihan kerugian untuk instrumen keuangan tersebut sejumlah kerugian kredit ekspektasi 12 bulan.

Bank Melakukan permodelan *Probability of Default, Loss Given Default, Credit Conversion Factor, Exposure at Default*, dan *Forward Looking of Macroeconomic* untuk semua segmentasi portofolio instrumen keuangan sesuai dengan metodologi yang telah ditentukan oleh Bank Sinarmas. Selain itu, Bank melakukan *review* secara berkala terhadap parameter *Probability of Default, Loss Given Default, Credit Conversion Factor*, dan *Forward Looking of Macroeconomic* minimal 1 tahun sekali.

Seperti pada penerapan PSAK 50/55, perhitungan *impairment* juga dilakukan dalam 2 kategori, yaitu individual dan kolektif.

a. Cadangan Kerugian Penurunan Nilai (CKPN) secara Individual
   1) CKPN individual dibentuk untuk kredit dengan plafon di atas Rp15 miliar dan telah menunggak lebih dari 90 hari atau belum menunggak selama 90 hari tetapi terdapat bukti objektif penurunan nilai.
   2) Perhitungan penurunan nilai secara individu:
      a) *Discounted Cash Flow*
         Penurunan nilai yang mengakibatkan kerugian diukur dari selisih antara nilai tercatat aset keuangan dengan nilai kini dari estimasi arus kas masa datang yang didiskontokan memakai tingkat suku bunga efektif awal dari aset keuangan yang dimaksud. Nilai tercatat aset tersebut dikurangi melalui akun cadangan kerugian penurunan nilai dan beban kerugian yang diakui pada Laporan Laba Rugi.

         Apabila tagihan telah jatuh tempo memiliki suku bunga variabel, maka kerugian penurunan nilai didiskontokan dengan menggunakan suku bunga efektif yang berlaku sesuai yang tertera dalam kontrak.
      b) Fair Value of Collateral
         Pengukuran aset keuangan dengan agunan dihitung berdasarkan nilai kini dari estimasi arus kas masa datang yang mencerminkan arus kas dari hasil penjualan atau pengambilalihan agunan dikurangi biaya-biaya untuk memperoleh dan menjual agunan tersebut.

Bank Sinarmas measures the allowance for financial instrument losses as the expected credit losses over their lifetime if the credit risk of those financial instruments has significantly increased since initial recognition. If, at the reporting date, the credit risk of the financial instruments has not increased significantly since initial recognition, the entity measures the allowance for those financial instruments as the 12-month expected credit losses.

The Bank conducts modeling of Probability of Default, Loss Given Default, Credit Conversion Factor, Exposure at Default, and Forward-Looking Macroeconomic for all segmentation of financial instrument portfolios according to the methodology established by Bank Sinarmas. Additionally, the Bank performs periodic reviews of the Probability of Default, Loss Given Default, Credit Conversion Factor, and Forward-Looking Macroeconomic parameters at least once a year.

In the application of PSAK 50/55, impairment calculations are also conducted in two categories, namely individual and collective.

a. Allowance for Impairment Losses (CKPN) on an Individual Basis
1) Allowance for Impairment Losses (CKPN) on an individual basis is established for credits with limits above Rp15 billion and have been overdue for more than 90 days or have not been overdue for 90 days but there is objective evidence of impairment.
2) Calculation of impairment on an individual basis:
   a) Discounted Cash Flow
      Impairment resulting in losses is measured by the difference between the carrying amount of the financial asset and the present value of estimated future cash flows discounted using the financial asset's original effective interest rate. The carrying value of the asset is reduced through the allowance for impairment losses account and recognized as an impairment loss in the Statement of Profit or Loss.

      If the matured receivable has a variable interest rate, then the impairment loss is discounted using the prevailing effective interest rate as stated in the contract.

   b) Fair Value of Collateral
      The measurement of financial assets with collateral is calculated based on the present value of estimated future cash flows reflecting the cash flows from the proceeds of the sale or realization of the collateral reduced by net of costs to obtain and sell the collateral.

b. Cadangan Kerugian Penurunan Nilai (CKPN) Kolektif
   1) CKPN kolektif dibentuk untuk seluruh kredit dengan plafon di bawah Rp15 miliar dan kredit dengan plafon di atas Rp15 miliar yang tunggakannya belum melebihi 90 hari. Metode perhitungan CKPN disesuaikan dengan standar kebijakan akuntansi yang berlaku.
   2) Bank melakukan evaluasi penurunan nilai secara kolektif menggunakan parameter *Probability of Default, Loss Given Default, Credit Conversion Factor, Exposure at Default*, dan *Forward Looking of Macroeconomic* dengan mengelompokkan aset keuangan berdasarkan kesamaan karakteristik risiko kredit, seperti terhadap jenis segmentasi kredit dan lama tunggakan.
   3) Bank menggunakan metode *migration analysis*, yaitu metode pendekatan yang dilakukan dengan menggunakan tingkat migrasi DPD secara *historical* minimal 3 tahun terakhir dalam menghitung *Probability of Default* (PD).

**3. Pengungkapan Risiko Kredit menggunakan Metode Standar**

a. Kebijakan Penggunaan Peringkat dalam Perhitungan Aset Tertimbang Menurut Risiko (ATMR) untuk Risiko Kredit.
   1) Dalam perhitungan ATMR risiko kredit, Bank menggunakan perhitungan dengan Pendekatan Standar (*Standardized Approach*).
   2) Kategori portofolio yang menggunakan peringkat eksternal adalah tagihan kepada pemerintah, entitas sektor publik, tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional, tagihan berupa *Covered Bond*, dan tagihan kepada Korporasi (surat berharga).
   3) Lembaga pemeringkat yang digunakan oleh Bank berpedoman pada ketentuan Bank Indonesia. Bank menggunakan beberapa lembaga pemeringkat yang diakui Otoritas Jasa Keuangan sesuai dengan Surat Edaran Otoritas Jasa Keuangan No. 37/SEOJK.03/2016 dalam rangka pemberian kredit kepada debitur berupa obligasi dan surat berharga lainnya, yaitu: Standard and Poor's, Fitch Rating, Moody's, Fitch Ratings Indonesia, dan Pemeringkat Efek Indonesia.

b. Pengungkapan Risiko Kredit Pihak Lawan (*Counterparty Credit Risk*)
   Eksposur derivatif yang dimiliki Bank Sinarmas tidak terlalu signifikan, di mana Bank hanya memiliki eksposur derivative nilai tukar. Transaksi Reverse Repo dan Repo yang dilakukan Bank cenderung insignifikan di mana transaksi tersebut sepenuhnya dilakukan dengan Bank Indonesia.

b. Collective allowance for impairment losses (CKPN)
   1) The collective allowance for impairment loss (CKPN) is formed for all credits with limits below Rp15 billion and credits with limits above Rp15 billion whose overdue period does not exceed 90 days. The method for calculating CKPN is adjusted in accordance with applicable accounting policy standards.
   2) The Bank evaluates impairment collectively using parameters such as Probability of Default, Loss Given Default, Credit Conversion Factor, Exposure at Default, and Forward-Looking Macroeconomic by grouping financial assets based on similar credit risk characteristics, such as credit segmentation types and overdue periods.
   3) The Bank uses the migration analysis method, an approach conducted by using historical migration rates of Days Past Due (DPD) for at least the last three years in calculating the Probability of Default (PD).

**3. Disclosure of Credit Risk Using Standard Methods**

a. Policy on the use of ratings in the calculation of Risk-Weigthed Assets (RWA) for credit.
   1) The Bank calculates RWA for credit risk using the Standardized Approach.
   2) Portfolio categories that use external ratings include receivables to the government, public sector entities, receivables to Multilateral Development Banks and International Institutions, receivables in the form of Covered Bonds, and receivables to Corporations (securities).
   3) The rating agencies hired by the Bank adhere to the regulations of Bank Indonesia. The Bank hires several rating agencies recognized by the Financial Services Authority (OJK) in accordance with Circular Letter No. 37/SEOJK.03/2016 for the provision of credit to debtors in the form of bonds and other securities, namely Standard and Poor's, Fitch Ratings, Moody's, Fitch Ratings Indonesia, and the Indonesian Securities Rating Agency.

b. Disclosure of Counterparty Credit Risk
   Bank Sinarmas's derivative exposure is not very significant, as the Bank only holds exposure to exchange rate derivatives. The Reverse Repo and Repo transactions conducted by the Bank tend to be insignificant, as these transactions are carried out entirely with Bank Indonesia.

c. Mitigasi Risiko Kredit

Pengungkapan risiko kredit sebesar eksposur tagihan/kredit yang diterima oleh pihak lawan/debitur dengan memperhitungkan jenis agunan yang diserahkan kepada Bank sebagai mitigasi risiko kredit Bank.

1) Dalam kebijakan perkreditan Bank jenis agunan yang umumnya dapat diterima, antara lain:
   a) Agunan yang *tangible*, yaitu termasuk benda yang tidak bergerak, seperti tanah dan/atau bangunan, maupun benda bergerak seperti deposito berjangka, kendaraan, mesin, kapal, persediaan barang, dan piutang usaha.
   b) Agunan yang *intangible*, yaitu seperti saham, *bancassurance*, reksadana, dan setoran jaminan.
   c) Bank dapat juga menerima penjaminan, seperti jaminan pribadi (*personal guarantee*), jaminan perusahaan (*corporate guarantee*), dan/atau penanggung (*guarantor*).
2) Kebijakan, prosedur dan proses untuk menilai dan mengelola agunan

   Pada prinsipnya pemberian pinjaman harus disesuaikan dengan kemampuan pembayarannya, tetapi analisa jaminan tetap dibutuhkan sebagai alternatif penyelesaian apabila pinjaman menjadi bermasalah. Jaminan yang diterima merupakan jaminan yang materil dan memiliki nilai pasar yang tinggi (*marketable*) dan diutamakan atas nama calon debitur. Agunan dilakukan penilaian oleh internal atau independen *appraisal* tergantung besar pinjamannya, mengacu pada Peraturan Otoritas Jasa Keuangan No. 40/POJK.03/2019 tentang Penilaian Kualitas Aset Bank Umum, pinjaman dari debitur atau kelompok peminjam dengan jumlah lebih dari Rp10 miliar, maka agunan harus dilakukan penilaian oleh independen *appraisal* sedangkan pinjaman dari debitur atau kelompok peminjam dengan jumlah sampai dengan Rp10 miliar dilakukan oleh internal *appraisal* Bank.
3) Pihak-pihak utama pemberi jaminan/garansi dan kelayakan kredit (*creditworthiness*)

   Untuk menjaga kemungkinan tidak tertagihnya kredit yang sudah diberikan kepada debitur, maka Bank dapat meminta tambahan agunan antara lain meminta jaminan dari pihak ketiga lainnya dan/atau garansi yang tidak berkaitan langsung dengan obyek yang dibiayai dan Bank akan menilai kelayakan kredit (*creditworthiness*) dari pihak-pihak tersebut. Pihak-pihak Utama pemberi jaminan/garansi tersebut dianalisis pada saat proses kredit dan kelayakannya diputuskan dengan penerapan *four-eye principles*.

c. Credit Risk Mitigation

Disclosure of credit risk is equal to the exposure of receivables/credit received by the counterparty/debtor by considering the type of collateral submitted to the Bank as its credit risk mitigation.

1) In the Bank's credit policy, the types of collateral accepted, among others:
   a) Tangible collateral includes immovable objects such as land and/or buildings, as well as movable objects such as time deposits, vehicles, machinery, ships, goods inventories, and trade receivables.
   b) Intangible collateral, such as stocks, bancassurance, mutual funds, and guarantee deposits.
   c) Banks may also accept guarantees such as personal guarantees, corporate guarantees, and/or guarantors.
2) Policies, procedures, and processes for assessing and managing collateral

   In principle, lending should be adjusted to the borrower's ability to pay, but the collateral analysis is still required as an alternative resolution if the loan encounters difficulties. The accepted collateral must be tangible and have high market value (marketable), preferably in the name of the prospective borrower. Collateral is assessed either internally or by independent appraisal depending on the loan amount, in accordance with Financial Services Authority Regulation No. 40/POJK.03/2019 regarding the Assessment of Asset Quality of Commercial Banks. For loans from a single borrower or group of borrowers exceeding Rp10 billion, an independent appraisal is required, while loans from a single borrower or group of borrowers totaling up to Rp10 billion are appraised internally by the bank.
3) Main parties providing collateral/guarantees and creditworthiness

   To mitigate the risk of uncollectible loans disbursed to borrowers, the Bank may request additional collateral, including guarantees from third parties and/or unrelated guarantees to the financed object, and the Bank will assess the creditworthiness of these parties. The main parties providing such guarantees are analyzed during the credit process, and their eligibility is determined through the application of the four-eye principle.

**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*. Risiko Pasar terjadi akibat adanya pergerakan variabel pasar (*adverse movement*) dari portofolio yang dimiliki Bank. Variabel pasar yang dimaksud adalah suku bunga dan nilai tukar. Risiko Pasar, antara lain terdapat pada aktivitas fungsional Bank seperti kegiatan *treasury* dan investasi dalam bentuk surat berharga dan pasar uang maupun penyertaan pada lembaga keuangan lainnya, penyediaan dana (pinjaman dan bentuk sejenis), kegiatan pendanaan dan penerbitan surat utang, serta kegiatan pembiayaan perdagangan(*trade finance*).

Bank menerapkan prinsip *segregation of duties* dengan memisahkan fungsi dan tanggung jawab secara independen atas transaksi perdagangan *treasury*, yang terdiri dari Unit *Front Office*, *middle office* dan *back office*. *Front office* melakukan aktivitas bisnis dan berhubungan langsung dengan nasabah. Dalam melakukan aktivitasnya, eksposur risiko yang timbul dibatasi dengan *risk appetite & risk tolerance* yang telah ditetapkan.

Pemantauan eksposur risiko dan kepatuhan terhadap limit-limit risiko dilakukan oleh unit independen, yaitu SKMR selaku *middle office*. Sedangkan proses aktivitas pembukuan dan *settlement* transaksi *treasury* serta proses valuasi portofolio dilakukan oleh Divisi *Treasury Settlement* sebagai *back office*. Koordinasi antar unit bisnis (sebagai *Front Office*) dan SKMR (sebagai *middle office*) semakin ditingkatkan, sehingga apabila terdapat potensi risiko bagi Bank dapat segera teridentifikasi dan dapat ditindaklanjuti dengan segera.

Kepemilikan Bank atas surat berharga terdapat pada seluruh buku, yaitu *Fair Value Through Profit and Loss* (FVTPL), *Fair Value Through Other Comprehensive Income* (FVOCI) dan *Amortized Cost* (AC). Secara komposisi, mayoritas Surat berharga berada pada buku FVOCI, diikuti AC dan FVTPL.

1. **Penerapan Manajemen Risiko Pasar**

   Risiko Pasar dapat terjadi pada seluruh portofolio yang dimiliki oleh Bank yang mencakup posisi yang dimiliki oleh Bank baik pada posisi buku *trading* (*trading book*) maupun pada buku Bank (*banking book*) sehingga pengelolaan risiko pasar dilakukan terhadap posisi instrumen keuangan dalam *trading book* maupun *banking book*.

   Berdasarkan pada Surat Otoritas Jasa Keuangan No. 23/SEOJK.03/2022 tentang Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Pasar bagi Bank Umum. Setiap instrumen yang dimiliki Bank untuk satu atau lebih tujuan berikut ini ditetapkan sebagai instrumen *trading book* ketika pertama kali dibukukan:

**Market Risk**

Market Risk is the risk to balance sheet positions and administrative accounts, including derivative transactions, due to overall changes in market conditions, including the risk of changes in option prices. Market risk occurs due to the movement of market variables (adverse movement) in the Bank's portfolio. The market variables are interest rates and exchange rates. Market risk, among others, is in the Bank's functional activities, such as treasury and investment activities in the form of securities and money market transactions, as well as participation in other financial institutions, the provision of funds (loans and similar forms), funding activities, and the issuance of debt securities, as well as trade finance activities.

The Bank implements the principle of segregation of duties by independently separating functions and responsibilities for treasury trading transactions, which consist of the Front Office, Middle Office, and Back Office units. The Front Office conducts business activities and interacts directly with customers. In carrying out its activities, the risk exposure is limited within the established risk appetite and risk tolerance.

Monitoring of risk exposure and compliance with risk limits is conducted by an independent unit, namely the Risk Management Work Unit (SKMR), as the middle office. Meanwhile, the bookkeeping and settlement processes of treasury transactions, as well as portfolio valuation, are carried out by the Treasury Settlement Division as the back office. Coordination between business units (as the Front Office) and SKMR (as the Middle Office) is enhanced so that potential risks to the Bank can be promptly identified and addressed accordingly.

The Bank's ownership of securities is present in all books, namely Fair Value Through Profit and Loss (FVTPL), Fair Value Through Other Comprehensive Income (FVOCI), and Amortized Cost (AC). In terms of composition, the majority of securities are in the FVOCI book, followed by AC and FVTPL.

1. Implementation of Market Risk Management

   Market risk can occur in the entire portfolio held by the Bank, encompassing positions held by the Bank in both the trading book and the banking book so that market risk management is conducted for financial instrument positions in both the trading book and the banking book.

   Based on Financial Services Authority Letter No. 23/SEOJK.03/2022 on the Calculation of Risk-Weighted Assets for Market Risk in Commercial Banks, any instrument owned by the Bank for one or more of the following purposes is designated as a trading book instrument when first booked:

a. Jual beli jangka pendek;
b. Mengambil keuntungan dari pergerakan harga jangka pendek;
c. Mengunci keuntungan arbitrase; dan/atau
d. Risiko lindung nilai yang timbul dari instrumen di atas, kecuali memiliki hambatan hukum atau termasuk dalam instrumen yang dikategorikan sebagai *banking book*.

Kemudian, setiap instrumen berikut ini, kecuali memiliki hambatan hukum atau termasuk dalam instrumen yang dikategorikan sebagai *banking book*, dianggap dimiliki untuk setidaknya satu dari tujuan *trading book* sehingga harus dikategorikan dalam *trading book*. Instrumen dimaksud, yaitu:

a. Instrumen pada *correlation trading portfolio*.
   *Correlation trading portfolio* merupakan seperangkat instrumen yang memenuhi persyaratan di bawah ini:
   1) Instrumen dimaksud merupakan posisi sekuritisasi; dan
   2) Instrumen merupakan lindung nilai non-sekuritisasi.
b. Instrumen yang akan menimbulkan posisi *net short* pada kredit atau ekuitas dalam *banking book*.
c. Instrumen yang dihasilkan dari komitmen penjaminan emisi (*underwriting commitments*).
d. Dalam hal *credit default swap* (CDS) yang digunakan untuk melindungi kredit pada *banking book* tetapi menimbulkan posisi *net short* kredit, maka instrumen CDS dimaksud atau instrumen serupa yang menimbulkan posisi *net short* kredit di *banking book* harus ditetapkan dalam *trading book*, kecuali perlakuan *trading book* secara eksplisit dikecualikan untuk jenis posisi tertentu.
e. Instrumen di bawah ini diasumsikan dimiliki dengan tujuan *trading* sehingga dapat dikategorikan sebagai instrumen *trading book*, kecuali memiliki hambatan hukum atau termasuk dalam instrumen *banking book*:
   1) Instrumen yang dimiliki sebagai aset atau liabilitas yang diperlakukan sebagai *trading* menurut standar akuntansi;
   2) Instrumen yang berasal dari aktivitas *market-making*; dan
   3) Investasi ekuitas dalam *fund* yang memenuhi persyaratan berikut.
      a) Bank dapat melakukan *look through* pada komponen individualnya serta terdapat informasi yang diberikan kepada Bank mengenai komposisi dari *fund* yang memadai dan berkala serta diverifikasi oleh pihak ketiga yang independen.
      b) Bank memperoleh penawaran harga harian untuk *fund* tersebut dan memiliki akses ke informasi yang tercakup dalam mandat *fund* atau dalam ketentuan peraturan perundang-undangan yang mengatur mengenai dana

a. Short-term trading;
b. Profiting from short-term price movements;
c. Locking in arbitrage profits; and/or
d. Hedging risks arising from the above instruments, unless legally constrained or classified as banking book instruments.

Then, each of the following instruments, unless legally constrained or classified as banking book instruments, is considered to be held for at least 1 of the trading book purposes and must therefore be categorized in the trading book. The instruments referred to are:

a. Instruments in correlation trading portfolio.
The correlation trading portfolio is a set of instruments that meet the following criteria:
   1) The instruments are securitized positions; and
   2) The instruments are non-securitized hedge positions.
b. Instruments that will result in a net short position on credit or equity in the banking book.
c. Instruments generated from underwriting commitments.
d. In term of a credit default swap (CDS) used to hedge credit in the banking book but resulting in a net short credit position, the CDS instrument or similar instruments generating a net short credit position in the banking book must be designated in the trading book, unless explicit trading book treatment is exempted for certain types of positions.
e. The following instruments are assumed to be held for trading purposes and therefore, can be categorized as trading book instruments unless legally constrained or included in banking book instruments:
   1) Instruments held as assets or liabilities treated as trading under accounting standards;
   2) Instruments derived from market-making activities; and
   3) Equity investments in funds that meet the following criteria.
      a) The Bank can perform a look-through on its individual components, and there is information provided to the Bank regarding the adequate and periodic composition of the fund, as well as being verified by an independent third party.
      b) The Bank obtains daily price quotations for the fund and has access to the information covered in the fund's mandate or laws and regulations governing the investment fund. The lookthrough approach is an approach

investasi tersebut. Adapun pendekatan *look through* merupakan pendekatan di mana Bank menentukan besarnya perhitungan beban modal yang relevan untuk posisi aset yang mendasari (*underlying*) seolah-olah posisi dimaksud dimiliki secara langsung oleh Bank sampai dengan komponen individualnya.

f. Transaksi *repo* yang berkaitan dengan *trading,* terdiri dari transaksi yang dilakukan untuk tujuan membentuk pasar (*market-making*), mengunci keuntungan arbitrase, atau menciptakan posisi *short* kredit atau ekuitas.

g. Hak opsi, termasuk derivatif melekat (*embedded derivative*) dari instrumen yang diterbitkan dari *banking book* dan yang berkaitan dengan risiko kredit atau risiko ekuitas.

Sementara itu, setiap instrumen yang tidak dimiliki untuk tujuan trading sebagaimana dimaksud pada poin-poin di atas, harus dikategorikan ke dalam *banking book*.

Risiko Pasar dalam *trading book* diukur dengan berbagai metodologi antara lain:

a. Analisa Sensitivitas Nilai Tukar
   Sensitivitas pada nilai tukar diukur dengan menghitung perubahan nilai wajar dari suatu instrumen nilai tukar apabila terdapat pergerakan sebesar 1 basis poin pada kurs *currency pair* yang digunakan pada instrumen nilai tukar tersebut.

b. *Value at Risk* (VaR)
   Secara umum, VaR dihitung dengan 3 metode, *Variance Covariance, Historical Simulations* dan *Monte Carlo*. Untuk saat ini, regulator mencukupkan pada metode *historical simulations*, dikarenakan metode *variance covariance* memiliki kekurangan terutama pada instrumen di mana faktor risiko dan nilai instrumen bergerak secara non-linear, dan *monte carlo* dianggap terlalu mutakhir dan cenderung memiliki biaya lebih tinggi.

   Metode VaR yang digunakan adalah *Historical Simulations,* dengan total data historis sebanyak 250 hari dan *confidence level* yang ditentukan, contohnya adalah sebesar 95% atau 99%. VaR *Historical Simulations* dihitung menggunakan *closing rate/ price* pada tiap harinya, dengan menstimulasikan durasi pembelian dan penjualan aset, atau dikenal sebagai *holding period,* hanya sebesar 1 hari. Keuntungan dan kerugian yang terbentuk akan menjadi acuan perhitungan VaR.

c. *Present Value of a Basis Point* (PV01)
   PV01 adalah parameter sensitivitas yang mengukur perubahan nilai wajar dari suatu instrumen apabila terdapat pergerakan sebesar 1 basis poin pada suku bunga.

where the Bank determines the amount of relevant capital charge calculation for the underlying asset positions as if the positions were held directly by the Bank up to their individual components.

f. Repo transactions related to trading consist of transactions conducted for the purpose of market-making, locking in arbitrage profits, or creating short positions in credit or equity.

g. Option rights, including embedded derivatives of instruments issued from the banking book and related to credit risk or equity risk.

Meanwhile, any instrument not held for trading purposes as described in the above points must be categorized into the banking book.

Market risk in the trading book is measured using various methodologies, including:

a. Exchange Rate Sensitivity Analisis
   Sensitivity to exchange rates is measured by calculating the fair value change of a foreign exchange instrument if there is a movement of one basis point in the currency pair exchange rate used for that instrument.

b. Value at Risk (VaR)
   In general, VaR is calculated using three methods, namely Variance Covariance, Historical Simulations, and Monte Carlo. Currently, regulators suffice with the historical simulations method, as the variance-covariance method has shortcomings, especially for instruments where risk factors and instrument values move nonlinearly, and Monte Carlo is considered too sophisticated and tends to incur higher costs.

   The VaR method used is Historical Simulations, with a total historical data of 250 days and a determined confidence level, for example, 95% or 99%. The VaR Historical Simulations are calculated using the closing rate/price for each day, simulating the duration of asset purchases and sales, also known as the holding period, which is only one day. Profits and losses that occur will be the reference for VaR calculation.

c. Present Value of a Basis Point (PV01)
   PV01 is a sensitivity parameter measuring the fair value change of an instrument when there is a movement of one basis point in interest rates.

d. Stop Loss Limit
*Stop loss limit* adalah perintah untuk menghentikan segala aktivitas yang menyebabkan kerugian kepada Bank akibat dari eksposur atau posisi yang dimiliki Bank terhadap suatu instrumen.
e. *Foreign Exchange Net Open Position* (FXNOP)
FX NOP adalah posisi devisa *netto* yang digunakan sebagai alat ukur eksposur Bank terhadap kepemilikan atas valuta asing.
f. *Stress Testing* Risiko Pasar
*Stress testing* risiko pasar adalah parameter yang digunakan untuk mengukur ketahanan permodalan Bank atas pergerakan nilai tukar dan suku bunga pada pasar.
g. Back Testing
*Back testing* adalah parameter yang digunakan untuk mengukur akurasi dari metodologi yang ditetapkan, dengan membandingkan hasil perhitungan dari metodologi dengan kondisi riil yang terjadi.

Pengelolaan portofolio yang terekspos risiko pasar dalam *trading book* dengan dilakukan penetapan dan memantau limit-limit, seperti limit portofolio, limit PV01, dan *stop loss* limit serta Bank melakukan proses valuasi secara harian berdasarkan harga transaksi yang terjadi atau kuotasi harga pasar dari sumber yang independen untuk seluruh instrumen yang diklasifikasikan dalam portofolio *trading book* dan *available for sale*. Sumber harga pasar yang digunakan terutama dari harga pasar yang dikeluarkan oleh Indonesia Bond Pricing Agency (IBPA) serta mempertimbangkan pula sumber acuan lainnya seperti, Refinitiv dan Bloomberg.

Pengukuran risiko pasar untuk perhitungan kewajiban penyediaan modal minimum (KPMM) dihitung dengan pendekatan standar (*standardized approach*) sesuai dengan SEOJK No. 23/SEOJK.03/2022 tentang Perhitungan Aset Tertimbang Menurut Risiko (ATMR) untuk Risiko Pasar bagi Bank Umum yang mulai diberlakukan pada 1 Januari 2024, yaitu meliputi perhitungan beban modal dengan metode *sensitivities based* (SBM), perhitungan beban modal untuk risiko gagal bayar/*default risk capital* (DRC), tambahan risiko residual / *Residual Risk Add-On* (RRAO) dan *Credit valuation adjustment* (CVA).

Bank telah menetapkan limit-limit untuk membatasi eksposur portofolio maupun potensi kerugian yang timbul dari aktivitas bisnis Bank. Pemantauan terhadap limit-limit tersebut dilakukan secara harian sehingga potensi risiko pasar yang timbul diharapkan dapat segera dimitigasi.

Kebijakan pengelolaan risiko nilai tukar berpedoman pada batas Posisi Devisa Neto sesuai limit internal bank dan ketentuan Bank Indonesia yaitu Bank wajib mengelola dan memelihara Posisi Devisa Neto paling tinggi 20% dari modal. Bank secara berkala melakukan kaji ulang terhadap kebijakan-kebijakan terkait Risiko Pasar. Bank menerapkan kebijakan *off market rate* pada transaksi yang dijalankan

d. Stop Loss Limit
A stop loss limit is an order to cease all activities that result in losses to the Bank due to the exposure or positions held by the Bank in a particular instrument.

e. Foreign Exchange Net Open Position (FXNOP)
FX NOP is the net foreign exchange position used as a measure of the Bank's exposure to ownership of foreign currencies.
f. Market Risk Stress Testing
Market risk stress testing is a parameter used to measure the resilience of the Bank's capital against movements in exchange rates and interest rates in the market.
g. Back Testing
Back Testing is a parameter used to measure the accuracy of the established methodology by comparing the calculation results of the methodology with real-life conditions.

Portfolio management exposed to market risk in the trading book involves setting and monitoring limits, such as portfolio limits, PV01 limits, and stop-loss limits. The Bank also conducts daily valuation processes based on transaction prices or market quotations from independent sources for all instruments classified in the trading book and available for sale. The primary source of market prices used is from the Indonesia Bond Pricing Agency (IBPA), while other reference sources such as Refinitiv and Bloomberg are also considered.

Market risk measurement for the calculation of minimum capital adequacy (CAR) is calculated using the standardized approach in accordance with SEOJK No. 23/SEOJK.03/2022 concerning the Calculation of Risk-Weighted Assets (ATMR) for Market Risk for Commercial Banks, which is effective on January 1, 2024. It includes the calculation of capital charges using the sensitivity-based method (SBM), calculation of capital charges for default risk capital (DRC), Residual Risk Add-On (RRAO), and Credit valuation adjustment (CVA).

The Bank has established limits to constrain portfolio exposure and potential losses arising from the Bank's business activities. Monitoring of these limits is conducted daily to promptly mitigate any potential market risks that arise.

The foreign exchange risk management policy is guided by the Net Open Position limit in accordance with the Bank's internal limits and Bank Indonesia regulations, which require banks to manage and maintain the Net Open Position at a maximum of 20% of capital. The Bank periodically reviews policies related to Market Risk. The Bank implements an off-market rate policy in transactions executed by the Treasury

oleh *Treasury* dengan tujuan agar *rate* yang ditransaksikan tidak berada di luar rentang harga wajar pasar, mengingat hal ini dapat menimbulkan potensi kerugian terhadap bank atau kerugian dari sisi nasabah yang akan memicu timbulnya risiko reputasi pada Bank.

Bank senantiasa memantau dan mengukur kecukupan modal yang dialokasikan untuk menutupi potensi kerugian yang timbul dari risiko pasar, baik risiko nilai tukar maupun risiko suku bunga. Pengukuran dilakukan dengan skenario: pergerakan nilai tukar dan suku bunga diasumsikan dalam kondisi normal hingga kondisi terburuk.

Bank telah menetapkan limit-limit untuk membatasi eksposur portofolio maupun potensi kerugian yang timbul dari aktivitas bisnis Bank. Pemantauan terhadap limit-limit tersebut dilakukan secara harian sehingga potensi risiko pasar yang timbul diharapkan dapat segera dimitigasi.

**2. Penerapan Manajemen Risiko Suku Bunga pada Buku Bank (IRRBB)**

Risiko Suku Bunga dalam *banking book* atau *Interest Rate Risk in The Banking Book* (IRRBB) merupakan risiko akibat pergerakan suku bunga di pasar yang berlawanan dengan posisi *banking book*, yang berpotensi memberikan dampak terhadap permodalan dan rentabilitas (*earnings*) Bank baik untuk saat ini maupun pada masa mendatang.

Pada *banking book*, risiko suku bunga dikelola dengan melakukan analisa *repricing gap* antara *risk sensitive asset* (RSA) dan *risk sensitive liabilities* (RSL). Analisa dilakukan untuk mengukur sensitivitas pendapatan bunga bersih dan kecukupan permodalan atas pergerakan suku bunga.

Bank melakukan proses identifikasi, pengukuran dan pengendalian atas risiko suku bunga di *banking book*. Risiko tersebut timbul akibat dari posisi aset dan kewajiban yang mempunyai perbedaan antara waktu perubahan suku bunga dan arus kas (*repricing risk*), perubahan keterkaitan suku bunga dari beberapa *yield curve* dengan posisi berbeda yang mempengaruhi aktivitas Bank (*basis risk*), perubahan keterkaitan suku bunga pada rentang jatuh tempo (*yield curve risk*), dan suku bunga terkait *option embedded* dalam produk *banking book* (*option risk*).

Dalam melakukan pengukuran risiko IRRBB, Bank menggunakan 2 (dua) metode yaitu berdasarkan perubahan pada nilai ekonomis dari ekuitas (*economic value of equity*) atau disingkat ΔEVE dan pengukuran berdasarkan perubahan pada pendapatan bunga bersih (*net interest income*) atau disingkat ΔNII yang mencakup skenario *shock* suku bunga dan skenario *stress* sesuai dengan skala waktu yang diatur pada Surat Edaran Otoritas Jasa Keuangan No. 12/SEOJK.03/2018.

to ensure that the transacted rate remains within the fair market price range, considering that deviations may lead to potential losses for the Bank or losses for customers, which could trigger reputation risks for the Bank.

The Bank continuously monitors and measures the adequacy of capital allocated to cover potential losses arising from market risks, including both foreign exchange and interest rate risks. Measurements are conducted using scenarios: exchange rate and interest rate movements are assumed under normal conditions to worst-case scenarios.

The Bank has set limits to constrain portfolio exposure and potential losses arising from the Bank's business activities. Monitoring of these limits is conducted daily to promptly mitigate any potential market risks that arise.

**2. Implementation of Risk Management for the Interest Rate in the Banking Book (IRRBB)**

Interest Rate Risk in the Banking Book (IRRBB), is the risk resulting from interest rate movements in the market that are opposite to the banking book positions, which potentially impact the Bank's capital and earnings, both at present and in the future.

In the banking book, interest rate risk is managed by analyzing the repricing gap between risk-sensitive assets (RSA) and risk-sensitive liabilities (RSL). This analysis is conducted to measure the sensitivity of net interest income and the adequacy of capital to interest rate movements.

The Bank conducts identification, measurement, and controlling processes of interest rate risk in the banking book. This risk arises from positions of assets and liabilities that have differences between the timing of interest rate changes and cash flows (repricing risk), changes in the connection of interest rates from several yield curves with different positions that affect the Bank's activities (basis risk), changes in the connection of interest rates across maturity ranges (yield curve risk), and interest rates related to options embedded in banking book products (option risk).

In measuring IRRBB risk, the Bank uses 2 (two) methods, namely based on changes in the economic value of equity (ΔEVE) or ΔEVE and measurement based on changes in net interest income (NII) or ΔNII, which includes interest rate shock scenarios and stress scenarios according to the time scale regulated in Financial Services Authority Circular Letter No. 12/SEOJK.03/2018.

Bank melakukan perhitungan IRRBB untuk setiap posisi akhir bulan laporan dan melakukan pelaporan kepada regulator serta pelaporan publikasi untuk setiap posisi akhir triwulan laporan sesuai ketentuan yang berlaku. Pengukuran sensitivitas terhadap IRRBB dilakukan sesuai ketentuan dalam Surat Edaran Otoritas Jasa Keuangan No. 12/SEOJK.03/2018, sebagai berikut.

a. Perhitungan IRRBB memperhitungkan keseluruhan posisi *banking book* dan dikelompokkan berdasarkan posisi mata uang yang material bagi Bank.
b. Pengukuran risiko IRRBB menggunakan metode ΔEVE dan ΔNII.
c. Perhitungan ΔEVE tidak memperhitungkan keberadaan margin komersial dalam arus kas dan dilakukan diskonto dengan *risk free rate* pada tanggal pelaporan.

Skenario *shock* suku bunga yang digunakan Bank dalam pengukuran IRRBB mengacu pada Surat Edaran Otoritas Jasa Keuangan No. 12/SEOJK.03/2018, sebagai berikut.

a. Metode EVE menggunakan 6 skenario *shock* suku bunga, yaitu:
   1) *Parallel Up*: *Shock* suku bunga yang paralel ke atas.
   2) *Parallel Down*: *Shock* suku bunga yang paralel ke bawah.
   3) *Steepener*: *Shock* suku bunga yang melandai dengan suku bunga jangka pendek menurun dan suku bunga jangka panjang meningkat (*short rates down* dan *long rates up*).
   4) *Flattener*: *Shock* suku bunga yang mendatar dengan perpaduan suku bunga jangka pendek meningkat dan suku bunga jangka panjang menurun.
   5) *Short Up*: *Shock* suku bunga jangka pendek yang meningkat.
   6) *Short Down*: *Shock* suku bunga jangka pendek yang menurun.
b. Metode NII menggunakan 2 skenario *shock* suku bunga, yaitu:
   1) *Parallel Up: Shock* suku bunga yang paralel ke atas.
   2) *Parallel Down: Shock* suku bunga yang paralel ke bawah.

Berikut adalah asumsi utama pemodelan dan parametrik yang digunakan Bank.

a. Perhitungan ΔEVE tidak memperhitungkan keberadaan margin komersial dalam arus kas dan dilakukan diskonto dengan *risk free rate* pada tanggal pelaporan.
b. Bank menetapkan rata-rata jatuh tempo (*repricing maturities*) NMD berdasarkan metodologi *core* deposit yang saat ini berlaku di Bank dengan menerapkan maksimal *core* yang ditetapkan oleh regulator.
c. Bank saat ini belum dapat mengestimasi *prepayment rate* dari pinjaman dan *early redemption rate* untuk deposito berjangka.

The Bank calculates IRRBB for each end-of-month position in the report and reports to the regulator, as well as public reporting for each end-of-quarter position, according to applicable regulations. Sensitivity measurements to IRRBB are conducted in accordance with the provisions in Financial Services Authority Circular No. 12/SEOJK.03/2018, as follows:

a. IRRBB calculations consider the entire banking book positions and are grouped based on material currency positions for the Bank.
b. IRRBB risk measurement uses the ΔEVE and ΔNII methods.
c. ΔEVE calculations do not consider the commercial margin in cash flows and are discounted with the risk-free rate on the reporting date.

The interest rate shock scenario used by banks in measuring IRRBB refers to Financial Services Authority Circular No. 12/SEOJK.03/2018, as follows:

a. The EVE method using six interest rate shock scenarios, namely:
   1) Parallel Up: an interest rate shock that is parallel to the top.
   2) Parallel Down: an interest rate shock that is parallel to the bottom.
   3) Steepener: a sloping interest rate shock with short-term interest rates decreasing and long-term interest rates increasing (short rates down and long rates up).
   4) Flattener: A flat interest rate shock characterized by an increase in short-term interest rates and a decrease in long-term interest rates.
   5) Short Up: An increase in short-term interest rates shock.
   6) Short Down: A decrease in short-term interest rates shock.
b. The NII method uses two interest rate shock scenarios, as follows:
   1) Parallel Up: An interest rate shock that is parallel to the top.
   2) Parallel Down: An interest rate shock that is parallel to the bottom.

Here are the main modeling assumptions and parametric used by the Bank:

a. The calculation of ΔEVE does not consider the presence of commercial margin in cash flows and is discounted with the risk-free rate on the reporting date.
b. The Bank sets the average repricing maturities of NMD based on the current core deposit methodology of the Bank by applying the maximum core set by the regulator.
c. Currently, the Bank is unable to estimate the prepayment rate for loans and the early redemption rate for time deposits.

d. Bank mengukur IRRBB untuk mata uang yang signifikan terhadap Total Aset atau Liabilitas mengikuti ketentuan regulator yakni IDR dan USD. Selanjutnya dalam menghitung ΔEVE dan ΔNII dilakukan agregasi dari kedua mata uang tersebut.

**Risiko Likuiditas**

Risiko likuiditas adalah risiko akibat ketidakmampuan Bank untuk memenuhi kewajiban yang jatuh tempo dari sumber pendanaan arus kas dan/atau dari aset likuid berkualitas tinggi yang dapat diagunkan, tanpa mengganggu aktivitas dan kondisi keuangan Bank. Pengelolaan risiko likuiditas merupakan salah satu aktivitas terpenting yang dilakukan oleh Bank yang bertujuan untuk meminimalkan kemungkinan ketidakmampuan Bank dalam memperoleh sumber pendanaan arus kas.

Salah satu upaya yang dilakukan Bank untuk memitigasi terjadinya risiko likuiditas adalah dibentuknya Tim *Asset Liability Management* (ALMA) yang berfungsi mengelola dan memonitor struktur aktiva dan kewajiban serta membuat strategi pendanaan Bank.

Dalam penerapan manajemen risiko likuiditas, Bank melakukan pemantauan likuiditas secara berkala, yang mencakup rasio-rasio likuiditas Bank diantaranya giro wajib minimum (GWM), giro RIM, rasio intermediasi makroprudensial (RIM), Penyangga Likuiditas Makroprudensial (PLM), *liquidity coverage ratio* (LCR), dan *net stable funding ratio* (NSFR), Pergerakan Deposan Inti, Laporan *Maximum Cumulative Outflow* (MCO), Laporan *Early Warning Indicator* (EWI), Laporan *Risk Appetie* dan *Risk Tolerance* (RART) dan *Stress Testing* likuiditas guna memastikan kecukupan likuiditas Bank untuk memenuhi penarikan dana nasabah pada kondisi krisis.

*Liquidity Coverage Ratio* (LCR) Bank berada pada level yang sangat memadai dengan komposisi *high quality liquid asset* (HQLA) terbesar berasal dari HQLA Level 1 berupa penempatan pada Bank Indonesia dan Surat Berharga yang diterbitkan Pemerintah Pusat dan Bank Indonesia. Selain itu, rasio NSFR Bank juga selalu berada di atas batas minimum yang ditetapkan oleh regulator (100%). Ketersediaan *stable funding* yang dimiliki Bank mencukupi untuk menutupi kebutuhan dana yang diperlukan di mana komposisi terbesar sumber dana berasal dari Simpanan terutama simpanan yang berasal dari nasabah perorangan dan pendanaan yang berasal dari nasabah usaha mikro dan kecil.

Dalam memastikan pengelolaan risiko likuiditas sudah sejalan dengan ketentuan/regulasi yang dikeluarkan oleh regulator dan sebagai dasar dalam melakukan identifikasi, analisa, pemantauan dan pengendalian risiko maka dilakukan kajian secara berkala terkait kebijakan, prosedur, limit, anggaran dan metodologi yang dimiliki oleh Bank.

d. The Bank measures IRRBB for significant currencies against Total Assets or Liabilities following regulatory requirements, namely IDR and USD. Furthermore, in calculating ΔEVE and ΔNII, aggregation is performed for both currencies.

**Liquidity Ratio**

Liquidity risk is the risk resulting from the Bank's inability to meet maturing obligations from cash flow funding sources and/or from high-quality liquid assets that can be easily monetized, without disrupting the Bank's activities and financial condition. Managing liquidity risk is one of the most important activities carried out by the Bank aiming at minimizing the possibility of the Bank's inability to obtain cash flow funding sources.

One of the efforts made by the Bank to mitigate liquidity risk is the establishment of an Asset Liability Management (ALMA) Team, which functions to manage and monitor the structure of assets and liabilities and develop funding strategies for the Bank.

In the implementation of liquidity risk management, the Bank conducts regular liquidity monitoring, which includes the Bank's liquidity ratios, including minimum reserve requirement (GWM), RIM, macroprudential intermediation ratio (RIM), Macroprudential Liquidity Buffer (PLM), liquidity coverage ratio (LCR), and net stable funding ratio (NSFR), Core Depositor Movement, Maximum Cumulative Outflow (MCO) Report, Early Warning Indicator (EWI) Report, Risk Appetie and Risk Tolerance (RART) Report, and liquidity Stress Testing to ensure the Bank's liquidity adequacy to meet customer's fund withdrawal in crisis condition.

The Bank's Liquidity Coverage Ratio (LCR) is highly adequate, with the largest composition of high-quality liquid assets (HQLA) derived from Level 1 HQLA in the form of placements with Bank Indonesia and Securities issued by the Central Government and Bank Indonesia. In addition, the Bank's NSFR ratio is always above the minimum limit set by the regulator (100%). The availability of stable funding owned by the Bank is sufficient to cover the necessary funding needs, where the largest composition of fund sources comes from Savings, especially savings from individual customers and funding from micro and small business customers.

To ensure that liquidity risk management is in line with the provisions/regulations issued by the regulator and as a basis for identifying, analyzing, monitoring, and controlling risks, the Bank conducts periodic reviews of its policies, procedures, limits, budgets, and methodologies.

Untuk memitigasi penarikan dana yang cukup signifikan, Bank menjaga kecukupan aset likuid pada level yang aman. Mitigasi risiko likuiditas juga dilakukan dengan cara *monitoring* arus kas oleh *Treasury* yang memiliki akses langsung kepada nasabah-nasabah besar dan mempunyai akses untuk memasuki pasar antar bank maupun non-bank untuk melakukan aktivitas *placing* maupun *taking*.

To mitigate significant withdrawal of funds, the Bank maintains an adequate level of liquid assets. Liquidity risk mitigation is also carried out by monitoring cash flows by the Treasury, which has direct access to large customers and has access to enter both interbank and non-bank markets to conduct placing and taking activities.

Bank secara berkala melakukan simulasi *stress testing* likuiditas dengan asumsi dan skenario dari kondisi biasa (*mild*) sampai dengan kondisi terburuk (*severe*) untuk melihat ketahanan likuiditas Bank pada kondisi krisis. Dalam hal jika Bank memasuki kondisi krisis likuiditas, Bank telah menyusun dokumen *Contingency Funding Plan* dan dokumen Pinjaman Likuiditas Jangka Pendek. Dokumen terkait *Contingency Funding Plan* dan Pinjaman Likuiditas Jangka Pendek mencakup kebijakan, strategi, prosedur dan rencana tindak (*action plan*) untuk memastikan kemampuan Bank memperoleh sumber pendanaan yang diperlukan secara tepat waktu dan dengan biaya yang wajar. Uji Coba *Contingency Funding Plan* dan Pinjaman Likuiditas Jangka Pendek secara berkala dilakukan oleh Bank untuk mengetahui ketersediaan dan kemampuan Bank dalam memperoleh pendanaan terutama dalam menghadapi kondisi *stress* likuiditas.

The Bank periodically conducts liquidity stress testing simulations with assumptions and scenarios ranging from mild to severe conditions to assess the Bank's liquidity resilience during crises. If the Bank enters a liquidity crisis, the Bank has prepared Contingency Funding Plan and Short-Term Liquidity Loan documents. These documents include policies, strategies, procedures, and action plans to ensure the Bank's ability to obtain necessary funding sources promptly and at reasonable costs. Testing of the Contingency Funding Plan and Short-Term Liquidity Loan is conducted regularly by the Bank to assess the availability and capability of the Bank to obtain funding, especially when facing liquidity stress conditions.

Pada dasarnya, risiko likuiditas dikelola sesuai dengan kerangka kebijakan, pengawasan, dan batasan yang memastikan bahwa konsentrasi pendanaan bersifat minimal, sumber dan jangka waktu pendanaan telah terdiversifikasi. Bank juga secara proaktif mengelola basis simpanan inti dan memastikan bahwa batas likuiditas yang ada dipatuhi.

Basically, liquidity risk is managed according to a framework of policies, monitoring, and limitations to ensure minimal concentration of funding, as well as diversified funding sources and durations. The Bank also proactively manages its core deposit base and ensures compliance with existing liquidity limits.

**Risiko Operasional**

Risiko operasional dapat disebabkan oleh ketidakcukupan dan/atau tidak berfungsinya proses internal, kesalahan manusia, kegagalan sistem, atau adanya faktor eksternal yang mempengaruhi operasional Bank.

**Operational Risk**

Operational risk can be caused by inadequacy and/or malfunctioning of internal processes, human errors, system failures, or external factors affecting the Bank's operations.

Pengelolaan risiko operasional didukung dengan struktur organisasi Bank yang mencakup:

1. Komite Pemantau Risiko: melakukan fungsi pengawasan dan memberikan arahan terkait dengan Manajemen Risiko Bank.
2. Komite Manajemen Risiko: melakukan pengawasan atas pengelolaan risiko yang dijalankan oleh Bank.
3. Direksi dan Komisaris, memastikan kebijakan terkait risiko operasional sejalan dengan strategi manajemen risiko Bank dan melakukan pemantauan terhadap implementasi pengelolaan risiko operasional.
4. Unit Kerja (lini pertama), merupakan *risk owner* yang bertanggung jawab untuk pengelolaan manajemen risiko pada aktivitas operasional harian.
5. *Risk Management Group* (lini kedua), melakukan identifikasi, pengukuran, *monitoring* terhadap risiko, serta memberikan rekomendasi untuk peningkatan kualitas kontrol kepada unit kerja terkait dengan menggunakan *operational risk tools*.

Operational risk management is supported by the Bank's organizational structure, which includes:

1. Risk Monitoring Committee: supervises and provides guidance on the Bank's Risk Management functions.
2. Risk Management Committee: supervises the risk management conducted by the Bank.
3. The Board of Directors and Board of Commissioners, ensures that policies related to operational risk are aligned with the Bank's risk management strategy and monitors the implementation of operational risk management.
4. Work Unit (first line), is the risk owners responsible for managing risk management in daily operational activities.
5. The Risk Management Group (second line), conducts risk identification, measurement, monitoring, and provides recommendations for improving control quality to the work units related, using operational risk tools.

6. Internal Audit (lini ketiga), memastikan bahwa risiko yang teridentifikasi telah dikelola dengan baik serta memastikan keefektifan pelaksanaan manajemen risiko dan internal kontrol oleh unit-unit bisnis.

Bank melaksanakan *Risk Control Self-Assessment* (RCSA) secara berkala untuk mengidentifikasi dan mengukur risiko operasional dan teknologi informasi serta internal kontrol yang telah dilakukan oleh lini pertama (unit kerja) dan dilakukan *focus group discussion*, penilaian dan validasi dokumen oleh lini kedua (*Operational* dan *IT Risk Management* ), dan dilakukan validasi atau audit mengenai keakuratan dan keandalannya oleh lini ketiga. Pencatatan atas kejadian operasional telah dilakukan Bank dengan menggunakan *loss event database* (LED) di mana detail kejadian dan nilai kerugian (*financial* dan *non-financial*) yang terjadi dicatat. Kelemahan yang ada telah ditindaklanjuti untuk penyempurnaan proses dan meminimalkan terjadinya pengulangan kejadian.

Bank juga memiliki perangkat risiko operasional berupa *Key Risk Indicators* (KRI) yang digunakan untuk mengidentifikasi atau memberikan suatu indikator (*early warning signal*) dan menganalisa risiko sejak dini atas naik turunnya indikator-indikator tingkat risiko dalam rangka pengendalian setiap risiko operasional yang melekat pada setiap aktivitas bisnis dan operasional Bank.

Mitigasi risiko operasional dilakukan melalui:

1. *Risk assessment* terhadap inisiatif produk dan aktivitas baru, kebijakan dan prosedur, *user access matrix* yang dimiliki oleh Bank.
2. Melakukan pengukuran risiko operasional dengan penerapan RCSA yang dilakukan secara komprehensif oleh lini pertama (unit kerja) dan lini kedua (*operational risk management*).
3. Pencatatan atas kejadian operasional baik yang menimbulkan kerugian finansial maupun tidak dalam LED.
4. Pengembangan KRI untuk unit kerja yang pengukurannya dilakukan secara berkala.
5. Dilakukan penerapan Strategi *Anti-Fraud* dalam rangka pengendalian potensi risiko *fraud,* baik dari internal maupun eksternal. Penerapan Strategi *Anti-Fraud* juga didukung oleh kebijakan serta sistem yang digunakan, seperti *Fraud Detection System.*
6. Penerapan *internal control* yang memadai antara lain melalui implementasi *Segregation of Duties* (SoD)/ pemisahan yang jelas terhadap tugas dan tanggung jawab pada setiap unit kerja, implementasi fungsi *dual control* dalam aktivitas transaksional dan/atau operasional.
7. *Training* dan sosialisasi berkala untuk meningkatkan kompetensi sumber daya manusia (SDM).

6. Internal Audit (third line), ensures that identified risks are well managed and ensures the effectiveness of risk management and internal control implementation by business units.

The Bank periodically conducts Risk Control Self-Assessment (RCSA) to identify and measure operational and information technology risks, as well as internal controls carried out by the first line (work units). This process involves focus group discussions, assessment, and document validation by the second line (Operational and IT Risk Management) and validation or audit regarding accuracy and reliability by the third line. Operational events are recorded by the Bank using a loss event database (LED), where details of the events and the value of losses (both financial and non-financial) are recorded. Identified weaknesses are followed up for process improvement and to minimize the occurrence of recurring events.

The Bank also has operational risk tools in the form of Key Risk Indicators (KRI) used to identify or provide an indicator (early warning signal) and analyze risks earlier concerning the fluctuations of risk level indicators in order to control every operational risk inherent in each business and operational activity of the Bank.

Operational risk mitigation is carried out through:

1. Risk assessment of new product initiatives and activities, policies and procedures, and user access matrices owned by the Bank.
2. Conducting operational risk measurement through comprehensive RCSA implementation carried out by the first line (work units) and the second line (operational risk management).
3. Recording of operational events, whether causing financial losses or not, in the Loss Event Database (LED).
4. Development of Key Risk Indicators (KRI) for work units with periodic measurement.
5. Implementation of Anti-Fraud Strategy to control potential fraud risks, both internal and external. The implementation of the Anti-Fraud Strategy is also supported by policies and systems used, such as the Fraud Detection System.
6. Adequate internal control implementation includes the implementation of Segregation of Duties (SoD) to clearly separate tasks and responsibilities in each work unit and the implementation of dual control functions in transactional and/or operational activities.
7. Periodic training and socialization to enhance the competency of human resources.

**Risiko Hukum**

Risiko hukum diidentifikasi sebagai risiko yang timbul dari kelemahan aspek hukum. Hal itu, antara lain akibat dari tindakan hukum, tidak adanya peraturan yang mendukung atau kelemahan dari ketentuan-ketentuan yang mengikat secara hukum, seperti kegagalan untuk mematuhi persyaratan hukum suatu perjanjian dan celah-celah dalam pengikatan jaminan.

Perkembangan dan dinamika transaksi memerlukan peningkatan optimalisasi atas peran dan Fungsi Legal yang ada. Dalam setiap aktivitas, baik perkreditan, operasional maupun *treasury*, Bank juga selalu memperhatikan kelengkapan aspek hukum, terutama yang berkaitan dengan aktivitas perikatan perjanjian dengan nasabah/debitur dan kelengkapan dokumen legalitas sebagai bentuk pengendalian risiko.

Sejumlah upaya yang telah dilakukan Bank untuk memperbaiki kelemahan-kelemahan terkait perjanjian, antara lain dengan melakukan *review* ulang dan pemutakhiran perjanjian kerja sama yang sudah tidak sesuai dengan pelaksanaan, program pelatihan bagi karyawan, sosialisasi guna membangun budaya sadar risiko hukum dan kepatuhan pada seluruh aspek lini Bank serta efektivitas terhadap pengendalian internal.

**Risiko Stratejik**

Secara umum, Risiko Stratejik adalah potensi kerugian yang ditimbulkan akibat ketidaktepatan dalam pembuatan dan pelaksanaan suatu keputusan strategis, serta kegagalan Bank dalam menanggapi perubahan lingkungan bisnis.

Bank telah membentuk Komite Manajemen Risiko dan Satuan Kerja Manajemen Risiko yang bertujuan untuk menunjang pengelolaan risiko yang menyeluruh, terpadu, terukur dan terkendali. Setiap komite ini didukung oleh grup kerja (*working group*) yang anggotanya terdiri dari grup-grup yang terkait langsung dengan permasalahan risiko yang termasuk dalam cakupan komite dimaksud salah satunya terkait dengan risiko stratejik seperti *Finance Performance Group*.

Pengelolaan risiko Bank diatur dalam suatu kebijakan manajemen risiko bank yang disusun dengan mengacu pada Peraturan Bank Indonesia (PBI), Peraturan Otoritas Jasa Keuangan (POJK), ketentuan Basel dan international best practices. Kebijakan ini ditinjau secara rutin untuk mengantisipasi perubahan kondisi bisnis, regulasi, dan kondisi internal Bank.

Dalam melakukan pengelolaan risiko strategis, Bank telah menyusun strategi dan rencana bisnis yang sebelumnya telah didiskusikan dengan Dewan Komisaris dan Direksi. Bank senantiasa melakukan review kinerja dan evaluasi kebijakan penyusunan target bisnis dan melakukan langkah-langkah perbaikan dalam menyusun rencana strategi dan target bisnis dengan mempertimbangkan kondisi internal dan eksternal, apabila diperlukan.

**Legal Risk**

Legal risk is identified as the risk arising from weaknesses in legal aspects. This includes, among others, the results of legal actions, lack of supporting regulations, or weaknesses in legally binding provisions, such as failure to comply with legal requirements of an agreement and gaps in security arrangements.

The development and dynamics of transactions require optimal enhancement of the role and function of existing Legal departments. In every activity, whether in lending, operations, or treasury, the Bank also always pays attention to the completeness of legal aspects, especially those related to contractual agreements with customers/debtors, and the completeness of legal documents as a form of risk control.

A number of efforts have been made by the Bank to address weaknesses related to agreements, including conducting a review and updating cooperation agreements that no longer align with implementation, training programs for employees, dissemination program to foster a culture of legal risk awareness and compliance with all aspects of the Bank's operations, and effectiveness of internal controls.

**Strategic Risk**

Generally, Strategic Risk is the potential loss resulting from inaccuracies in making and implementing strategic decisions, as well as the Bank's inability to respond to changes in the business environment.

The Bank established a Risk Management Committee and Risk Management Work Unit to support comprehensive, integrated, measurable, and controllable risk management. Each of these committees is supported by a working group whose members consist of groups directly related to the risk issues included in the scope of the committee, one of which is related to strategic risk such as the Finance Performance Group.

The Bank's risk management is regulated in a bank risk management policy prepared with reference to Bank Indonesia Regulations (PBI), Financial Services Authority Regulations (POJK), Basel provisions, and international best practices. Kebijakan ini ditinjau secara rutin untuk mengantisipasi perubahan kondisi bisnis, regulasi, dan kondisi internal Bank.

In managing strategic risk, the Bank has developed strategies and business plans that have previously been discussed with the Board of Commissioners and Board of Directors. The Bank constantly reviews performance and evaluates the policy for preparing business targets and takes corrective steps in preparing strategic plans and business targets by considering internal and external conditions, if necessary.

Pengukuran kinerja Bank dilakukan dengan melakukan *monitoring* secara berkala melalui laporan-laporan yang ditujukan kepada Direksi serta kantor cabang/unit kerja terkait.

Bank performance measurement is conducted by regularly monitoring through reports directed to the Board of Directors and relevant branch offices/work units.

Pada akhir tahun 31 Desember 2024, Bank telah mencapai realisasi yang baik pada pos-pos keuangan seperti Laba, CAR, NPL Gross, NPL Net, ROE, ROA, dan BOPO. Hal ini menunjukkan bahwa Bank secara bertahap melakukan penyempurnaan pada seluruh proses aktivitas bisnis Bank untuk lebih mengakselerasi pencapaian kinerja sesuai dengan target yang ditentukan.

At the end of the year, December 31, 2024, the Bank achieved good realization on financial items such as Profit, CAR, Gross NPL, Net NPL, ROE, ROA, and BOPO. It shows that the Bank gradually makes improvements to the entire process of the Bank's business activities to further accelerate the achievement of performance in accordance with the specified targets.

Sesuai dengan Rencana Stratejik Bank, maka Bank telah melaksanakan *spin off* UUS menjadi PT Bank Nano Syariah pada Januari 2024 dan pengembangan *Digital Banking* yang bekerja sama dengan pihak ketiga dalam rangka pemberian kredit melalui platform *mobile banking* (*Digital Loan*) secara bertahap.

In accordance with the Bank's Strategic Plan, the Bank carried out the UUS spin off into PT Bank Nano Syariah in January 2024 and the development of Digital Banking in collaboration with third parties in order to provide credit through the mobile banking platform (Digital Loan) in stages.

Pengembangan bisnis Bank pada tahun 2024, yaitu dengan melakukan diversifikasi produk dengan mengembangkan beberapa produk/aktivitas baru, seperti:

1. Reksana Dana Indeks Simas Sri-Kehati, yaitu reksa dana berbasis Sri-Kehati yang bertujuan untuk memperoleh pendapatan yang optimal dalam jangka panjang dengan tingkat fleksibilitas.
2. Unit Link Premi Sekaligus / SPUL, yaitu produk asuransi yang dikaitkan dengan investasi (Unit Link) dengan pembayaran premi sekaligus yang memberikan manfaat asuransi jiwa dan pilihan asuransi tambahan serta investasi.
3. *Marketing Management Plattform*, yaitu *tools* untuk melakukan pengelolaan aktivitas marketing secara digital, mulai dari *campaign management* hingga *performance marketing*.
4. Reksa Dana Terpotreksi STAR Protected 23, yaitu reksa dana yang akan memproteksi 100% pokok investasi Investor pada saat jatuh tempo, dengan fitur khusus adanya proteksi (namun bukan jaminan) terhadap nilai pokok investasi awal jika tidak terjadi wan-prestasi (gagal bayar) dari Emiten penerbit obligasi / surat hutang yang digunakan (dalam mata uang Rupiah).
5. Unit Link Premi Berkala / RPUL / Pengganti Simas Magna Link, yaitu produk asuransi yang dikaitkan dengan investasi (Unit Link) dengan pembayaran premi berkala yang memberikan manfaat asuransi jiwa dan pilihan asuransi tambahan serta investasi.
6. Sinergi Perbankan (dalam rangka *spin off* UUS menjadi BUS), yaitu kerja sama antara BUK dan BUS hasil *spin off* melalui pengoptimalan sumber daya Bank Umum untuk menunjang pelaksanaan kegiatan BUS yang memberikan nilai tambah bagi BUS dan Bank Umum.
7. Term ROP (DMTM), yaitu produk asuransi jiwa berjangka yang memberikan manfaat perlindungan jiwa selama 12 tahun dan manfaat pengembalian premi pada tahun polis ke-8.

The Bank's business development in 2024 involved diversifying products by developing several new products/activities, such as:

1. Simas Sri-Kehati Index Mutual Fund, a Sri-Kehati-based mutual fund that aims to obtain optimal income in the long term with a level of flexibility.
2. Unit Link Premi Sekaligus/SPUL, an insurance product linked to investment (Unit Link) with a lump sum premium payment that provides life insurance benefits and additional insurance and investment options.
3. Marketing Management Plattform, a tool to manage marketing activities digitally, from campaign management to performance marketing.
4. STAR Protected 23 Mutual Fund, a mutual fund that will protect 100% of the Investor's investment principal at maturity, with a special feature of protection (but not a guarantee) of the initial investment principal value if there is no default of the issuer of the bonds/debt securities used (in Rupiah currency).
5. Periodic Premium Link Unit/RPUL/Simas Magna Link Replacement, an insurance product linked to investment (Unit Link) with periodic premium payments that provide life insurance benefits and additional insurance and investment options.
6. Banking Synergy (in the context of UUS spin off into BUS), namely cooperation between BUK and BUS spin off results through optimizing Commercial Bank resources to support the implementation of BUS activities that provide added value to BUS and Commercial Banks.
7. Term ROP (DMTM), a term life insurance product that provides life protection benefits for 12 years and premium return benefits in the 8th policy year.

8. Pengembangan bisnis *acquiring* untuk transaksi pembayaran menggunakan *contactless* dan lainnya kerjasama dengan lembaga *switching* (GPN) dan principal internasional, termasuk Kartu Kredit Indonesia (KKI), yaitu pengembangan *issuing* & *acquiring* untuk menerima pembayaran, bekerja sama dengan lembaga *switching* (GPN), principal internasional ataupun pihak ketiga lainnya seperti fitur *contactless* pada EDC, *cardless withdraw*, dan lain-lain.
9. Kerja sama tarik dan setor dengan Pihak Ketiga, sehingga nasabah Bank Sinarmas dapat melakukan transaksi tarik dan setor tunai melalui pihak ketiga.

Bank senantiasa menjaga efektivitas serta efisiensi dari aktivitas operasional antara lain pelaksanaan operasional kantor Bank dilakukan secara *hybrid* (separuh dilakukan di rumah (*Work From Home*) dan separuh dilakukan di kantor (*Work From Office*)), meningkatkan pertumbuhan DPK, secara bertahap meningkatkan rasio RIM, selektif dalam penyaluran kredit, meningkatkan kepemilikan SUN, dan Bank menyusun Pokok-Pokok Kebijakan Internal Bank yang mendukung POJK Stimulus dalam rangka Pertumbuhan Ekonomi kepada Regulator.

**Risiko Kepatuhan**

Risiko kepatuhan merupakan risiko yang timbul ketika Bank tidak mematuhi atau tidak melaksanakan peraturan perundang-undangan dan ketentuan hukum lain yang berlaku.

Bank secara berkala menyempurnakan kebijakan dan prosedur serta limit-limit yang mengacu kepada ketentuan regulator serta institusi terkait lainnya, seperti Kementerian Keuangan, Peraturan Pemerintah, Undang-Undang Perbankan, dan lainnya. Bank melakukan kajian kembali secara berkala terhadap kebijakan, prosedur dan limit. Kajian tersebut untuk mengukur kesesuaiannya dengan skala dan kompleksitas Bank serta untuk meningkatkan kehati-hatian dan mitigasi risiko kepatuhan.

Dalam rangka menerapkan manajemen risiko kepatuhan yang efektif, Bank Sinarmas melakukan identifikasi dan pengelolaan terhadap faktor-faktor yang dapat menyebabkan meningkatnya eksposur risiko kepatuhan, antara lain:

1. Penerapan GCG secara efektif untuk memastikan dan memantau kepatuhan terhadap setiap peraturan dan persyaratan secara eksternal maupun internal.
2. Melakukan penilaian secara aktif dan berkala terhadap kecukupan kebijakan Pedoman dan Prosedur Internal yang dimiliki oleh Bank untuk memastikan kesesuaiannya terhadap peraturan dan perundang-undangan yang berlaku.
3. Proaktif melakukan sosialisasi terkait dengan pemberlakuan peraturan-peraturan Regulator yaitu baik dalam bentuk sosialisasi langsung, juga dilakukan penyempurnaan materi sosialisasi ketentuan terbaru melalui media internal dengan menambahkan rangkuman dari ketentuan tersebut.

8. Development of acquiring business for payment transactions using contactless and others in collaboration with switching institutions (NPG) and international principals, including Indonesian Credit Cards (KKI), namely the development of issuing & acquiring to receive payments, in collaboration with switching institutions (NPG), international principals or other third parties such as contactless features on EDC, cardless withdrawals, etc.
9. Cooperation of withdrawal and deposit with third parties, so that Bank Sinarmas' customers can conduct cash withdrawal and deposit transactions through third parties.

The Bank continues to maintain the effectiveness and efficiency of operational activities, among others, the implementation of the Bank's office operations is carried out in a hybrid manner (half is performed at home (Work From Home) and half is performed in the office (Work From Office)), increasing the growth of deposits, gradually increasing the RIM ratio, being selective in lending, increasing SUN ownership, and the Bank compiles the Bank's Internal Policy Principles that support POJK Stimulus in the context of Economic Growth to the Regulator.

**Compliance Risk**

Compliance risk is the risk that arises when the Bank fails to comply with or implement applicable laws and regulations and other legal provisions.

The Bank periodically enhances policies, procedures, and limits that adhere to regulatory requirements and other relevant institutions, such as the Ministry of Finance, Government Regulations, Banking Laws, and others. The Bank conducts regular reviews of policies, procedures, and limits to assess their suitability with the Bank's scale and complexity and to enhance caution and compliance risk mitigation.

In order to implement effective compliance risk management, Bank Sinarmas identifies and manages factors that can lead to increased compliance risk exposure, including:

1. Effective implementation of GCG to ensure and monitor compliance with external and internal regulations and requirements.
2. Actively and periodically assessing the adequacy of the Bank's Internal Guidelines and Procedures to ensure their compliance with applicable regulations and laws.
3. Proactively conducting dissemination regarding the implementation of Regulatory regulations, both in the form of a direct dissemination program and by improving the material of the latest provisions through internal media by adding summaries of those provisions.

4. Melakukan identifikasi dan analisa kepatuhan (*compliance analysis*) atas rencana dan pengembangan produk dan aktivitas baru guna memastikan kepatuhannya terhadap peraturan dan perundang-undangan yang berlaku.

**Risiko Reputasi**

Risiko reputasi dapat timbul akibat adanya pemberitaan negatif yang menyangkut operasional Bank, atau persepsi negatif tentang Bank.

Dalam rangka memenuhi kebutuhan pengelolaan risiko reputasi yang memadai, Bank antara lain memiliki Unit Kerja *Contact Center* untuk memberikan layanan informasi perbankan serta menerima keluhan/pengaduan nasabah. Kemudian, *Corporate Secretary* memberikan informasi yang perlu disampaikan kepada publik/*stakeholders* terkait aktivitas Bank, serta petugas Bank di kantor-kantor cabang yang setiap saat dapat memberikan informasi kepada nasabah.

Selain itu, pengendalian risiko reputasi juga dilakukan antara lain dengan melalui pemantauan yang dilakukan oleh Unit Kerja *Corporate Secretary* terhadap berita yang berkaitan dengan Bank Sinarmas di media massa, Bank juga secara aktif melakukan *Corporate Social Responsibility* yang dilaksanakan di bidang pendidikan dan kesehatan.

Bank telah menerapkan prinsip transparansi dalam tata cara penanganan pengaduan nasabah dan penyelesaian sengketa kepada kantor cabang/unit kerja serta kepada nasabah. Hal itu sesuai dengan ketentuan regulator tentang Pengaduan Nasabah dan Mediasi Perbankan, termasuk dalam hal apabila terjadi krisis.

Bank memiliki sistem informasi manajemen untuk pencatatan dan administrasi pengaduan nasabah, terutama terkait dengan pengaduan mengenai produk dan layanan Bank. Aplikasi ini membantu Bank untuk menyelesaikan pengaduan dengan baik sesuai *Service Level Agreement* (SLA).

Transparansi produk yang ditawarkan kepada nasabah sesuai dengan ketentuan regulator mengenai transparansi produk melalui situs web Bank, serta upaya peningkatan standar layanan nasabah dengan melakukan *training service excellence* kepada petugas Bank. Selain itu, Bank memiliki Unit Kerja *Service Quality* yang bertugas untuk memastikan kualitas pelayanan yang diberikan oleh petugas bank kepada nasabah sudah sesuai dengan standar yang ditetapkan.

Untuk memastikan pelayanan yang berkualitas, cabang melakukan *role play* minimal 1 minggu sekali serta *Mystery Call* yang berkoordinasi dengan Unit Kerja *Service Quality, Mystery Shopper* yang dilakukan oleh Unit Kerja *Service Quality* maupun petugas yang ditunjuk oleh unit kerja tersebut. Selain itu, melalui unit *Service Quality*, Bank juga melakukan sosialisasi terkait kebijakan di bidang layanan.

4. Conducting identification and compliance analysis of plans and development of new products as well as activities to ensure their compliance with applicable laws and regulations.

**Reputation Risk**

Reputation risk can arise due to negative news related to the Bank's operations or negative perceptions about the Bank.

In order to meet the needs of adequate reputation risk management, the Bank, among other things, has a Contact Center Work Unit to provide banking information services and handle customer complaints.
Additionally, the Corporate Secretary provides information that needs to be communicated to the public/stakeholders regarding the Bank's activities, and Bank officers at branch offices who can provide information to customers at any time.

Furthermore, reputation risk control is also carried out, among other things, through monitoring conducted by the Corporate Secretary Work Unit on news related to Bank Sinarmas in the mass media. The Bank also actively engages in Corporate Social Responsibility activities in the education and healthcare sectors.

The Bank has implemented transparency principles in handling customer complaints and dispute resolutions at branch offices/work units and for customers. This is in accordance with regulatory provisions regarding Customer Complaints and Banking Mediation, including during a crisis.

The Bank has a management information system for recording and administering customer complaints, especially regarding complaints about Bank products and services. This application helps the Bank to resolve complaints efficiently according to the Service Level Agreement (SLA).

Product transparency offered to customers complies with regulatory provisions regarding product transparency through the Bank's website, and efforts to improve customer service standards are made through service excellence training for Bank officers. Additionally, the Bank has a Service Quality Work Unit responsible for ensuring that the quality of service provided by bank officers to customers meets established standards.

To ensure quality service, branch offices conduct role-play sessions at least once a week, as well as Mystery Calls coordinated with the Service Quality Work Unit and Mystery Shopper evaluations conducted by the Service Quality Work Unit or designated officers. In addition, through the Service Quality unit, the Bank also conducts outreach activity regarding policies in the service segment.

# Laporan Publikasi Eksposur Risiko dan Permodalan untuk ATMR Risiko Kredit - Pendekatan Standar

## Publication Report on Risk Exposure and Capital for Credit Risk RWA - Standardized Approach

### Pengungkapan Informasi Kualitatif terkait Risiko Kredit secara Umum (CRA)

**Qualitative Information Disclosure Related to Credit Risk in General (CRA)**

Periode Laporan : Desember 2024
Report Period : December 2024

| Analisa Kualitatif | Qualitative Analysis |
|---|---|
| Dalam penerapan Manajemen Risiko Kredit di Bank Sinarmas, Model bisnis dilakukan sesuai dengan profil risiko bank, yang meliputi risiko yang melekat pada aktivitas perkreditan Bank (Inherent Risk), serta terhadap Kualitas Penerapan Manajemen Risiko (KPMR). Hasil penilaian profil risiko Bank digunakan untuk melihat efektivitas penerapan manajemen risiko. Apabila terdapat penerapan manajemen risiko yang belum efektif, Bank dapat segera memperbaiki penerapan kontrol yang ada, sehingga tujuan yang telah ditetapkan oleh Bank dapat tercapai. Penilaian profil risiko tersebut dilakukan secara self asessment oleh Bank untuk disampaikan kepada Otoritas Jasa Keuangan. | In the implementation of Credit Risk Management at Bank Sinarmas, the business model is aligned with the bank's risk profile, which includes the inherent risks associated with the bank's lending activities (Inherent Risk), as well as the Quality of Risk Management Implementation (KPMR). The results of the bank's risk profile assessment are utilized to evaluate the effectiveness of risk management practices. Should there be any ineffective risk management implementations, the bank can promptly rectify the existing controls, ensuring that the objectives set by the bank are achieved. This risk profile assessment is conducted through self-assessment by the bank and reported to the Financial Services Authority. |
| Bank memiliki kebijakan, dan prosedur penerapan manajemen risiko kredit, yang tertuang dalam Pedoman Manajemen Risiko Bank Sinarmas. Pedoman tersebut telah diterapkan secara konsisten dan secara berkala dilakukan peninjauan kembali untuk memastikan kesesuaiannya dengan perkembangan bisnis, visi, misi, dan strategi Bank, serta perubahan regulasi yang berlaku. Penyusunan pedoman tersebut didasarkan pada strategi manajemen risiko, limit risiko dalam kewenangan pengambilan keputusan pemberian kredit, maupun dalam Risk appetite dan Risk Tolerance yang memperhatikan kemampuan modal Bank untuk dapat menyerap risiko. Penetapan Risk Appetite dan Risk Tolerance disesuaikan dengan kompleksitas bisnis Bank, hasil dari Rencana Bisnis Bank, data historis Bank satu tahun terakhir, ketentuan regulator, data benchmarking terhadap peers Bank, statistik perbankan, serta informasi modal Bank. Risk Appetite dan Risk Tolerance disusun oleh Satuan kerja Risk Management Group untuk dievaluasi dan diajukan kepada Komite Manajemen Risiko. Selanjutnya, Risk Appetite dan Risk Tolerance direkomendasikan kepada Dewan Direksi untuk mendapatkan persetujuan dan penetapan. | The bank has established policies and procedures for credit risk management, outlined in the Bank Sinarmas Risk Management Guidelines. These guidelines have been consistently applied and are periodically reviewed to ensure their alignment with business developments, the bank's vision, mission, and strategy, as well as applicable regulatory changes. The formulation of these guidelines is based on risk management strategies, risk limits within the authority of credit decision-making, and the Risk Appetite and Risk Tolerance that consider the bank's capital capacity to absorb risks. The establishment of Risk Appetite and Risk Tolerance is adjusted to the complexity of the bank's business, the results of the Bank's Business Plan, historical data from the past year, regulatory provisions, benchmarking data against peer banks, banking statistics, and the bank's capital information. Risk Appetite and Risk Tolerance are prepared by the Risk Management Group for evaluation and submission to the Risk Management Committee, and subsequently recommended to the Board of Directors for approval and establishment. |
| Dalam rangka penerapan manajemen Risiko dan tata kelola yang efektif, Bank telah menetapkan struktur manajemen risiko disertai dengan tugas dan tanggung jawab pada seluruh satuan kerja yang disesuaikan dengan tujuan dan kebijakan, serta ukuran dan kompleksitas kegiatan usaha Bank. Dimana telah membentuk satuan kerja Risk Management Group yang bertanggung jawab kepada Compliance and Risk Management Director. Satuan kerja Risk Management Group tersebut independen terhadap satuan kerja bisnis. Untuk melaksanakan fungsi pengawasan dan pemantauan risiko Bank (Risk Oversight), serta mewujudkan Good Corporate Governance, Dewan Komisaris menetapkan Komite Pemantau Risiko yang memiliki tugas membantu Dewan Komisaris dalam melakukan pengawasan dan pemantauan pelaksanaan penerapan manajemen risiko, dan menilai efektifitas penerapan manajemen risiko. Sedangkan di tingkat Direksi ditetapkan Komite Manajemen Risiko yang memiliki wewenang dan tanggung jawab untuk melakukan evaluasi dan memberikan rekomendasi kepada direktur utama terkait penerapan Manajemen Risiko termasuk didalamnya Risiko Kredit. Dalam pelaksanaan aktivitas perkreditan, Organisasi manajemen risiko kredit Bank Sinarmas menerapkan sistem four eyes principle sebagai salah satu pengendalian Risiko Kredit dalam proses pemberian kredit pada segmen Corporate, Commercial Business Management, MSME dan Card & Consumer Loan. | To ensure effective risk management and governance, the bank has established a risk management structure accompanied by duties and responsibilities across all work units, tailored to the objectives and policies, as well as the size and complexity of the bank's business activities. The bank has formed a Risk Management Group that reports to the Compliance and Risk Management Director. This Risk Management Group operates independently from the business units. To carry out the risk oversight function and realize Good Corporate Governance, the Board of Commissioners has established a Risk Monitoring Committee tasked with assisting the Board of Commissioners in overseeing and monitoring the implementation of risk management and assessing its effectiveness. At the Board of Directors level, a Risk Management Committee has been established with the authority and responsibility to evaluate and provide recommendations to the President Director regarding the implementation of Risk Management, including Credit Risk. In the execution of lending activities, the credit risk management organization at Bank Sinarmas applies the four eyes principle as one of the controls for Credit Risk in the credit granting process across the Corporate, Commercial Business Management, MSME, and Card & Consumer Loan segments. |

| Analisa Kualitatif | Qualitative Analysis |
|---|---|
| Bank mengadopsi model Three Lines of Defense, dimana masing-masing lini saling bersinergi dalam menerapkan manajemen risiko. Lini Pertahanan Pertama (1st Lines of Defense) merupakan Risk Taking Unit (Pemilik Risiko), yang terdiri dari unit bisnis dan unit pendukung yang bertanggung jawab melakukan identifikasi dan mengelola risiko yang ada dari kegiatan/ aktivitas bisnis sehari-hari sesuai dengan ketentuan internal, dan tingkat risiko yang berlaku. Untuk Lini Pertahanan Kedua (2nd Lines of Defense), memiliki fungsi sebagai pengawas risiko terdiri dari Risk Management Group (yang membawahi Credit Risk Division), dan Compliance Group, yang bertanggungjawab menetapkan kebijakan, Risk Appetite dan Risk Tolerance, melakukan pengawasan yang independen dari aktivitas bisnis khususnya perkreditan, serta pelaporan ke manajemen untuk memastikan bahwa Bank melakukan aktivitas bisnis dan beroperasi sesuai dengan appetite dan ketentuan yang berlaku. Selanjutnya Lini Pertahanan Ketiga (3rd Lines of Defense), merupakan Satuan Kerja Audit Internal, yang memiliki fungsi mengevaluasi pelaksanaan manajemen risiko kredit dan proses pengendalian bidang perkreditan di Bank seperti apakah risiko kredit telah diidentifikasi dan dikelola secara tepat serta kualitas dan perbaikan berkesinambungan telah melekat di dalam proses pengendalian Bank, baik pada lini pertama maupun lini kedua. | The bank adopts the Three Lines of Defense model, where each line synergizes in implementing risk management. The First Line of Defense consists of the Risk Taking Unit (Risk Owner), which includes business units and supporting units responsible for identifying and managing risks arising from daily business activities in accordance with internal regulations and applicable risk levels. The Second Line of Defense functions as the risk supervisor, comprising the Risk Management Group (which oversees the Credit Risk Division) and the Compliance Group, responsible for establishing policies, Risk Appetite, and Risk Tolerance, conducting independent oversight of business activities, particularly lending, and reporting to management to ensure that the bank conducts business activities and operates within the established appetite and regulations. The Third Line of Defense is the Internal Audit Unit, which evaluates the implementation of credit risk management and the control processes in lending at the bank, assessing whether credit risks have been identified and managed appropriately, and whether quality and continuous improvement are embedded in the bank's control processes, both at the first and second lines. |
| Pelaporan informasi risiko kredit disampaikan kepada Dewan Komisaris dan Direksi melalui komite yang dibentuk dan berada di bawah Dewan Komisaris dan Direksi. Untuk komite di bawah Dewan Komisaris disampaikan melalui Komite Pemantau Risiko, sedangkan untuk Komite dibawah Direksi disampaikan melalui Komite Manajemen Risiko. Beberapa informasi yang disampaikan dalam laporan adalah Laporan Profil Risiko, dan Laporan Portofolio Kredit. | Reporting of credit risk information is conveyed to the Board of Commissioners and the Board of Directors through committees established under the Board of Commissioners and the Board of Directors. For the committee under the Board of Commissioners, information is reported through the Risk Monitoring Committee, while for the committee under the Board of Directors, information is reported through the Risk Management Committee. Some of the information presented in the reports includes the Risk Profile Report and the Credit Portfolio Report. |

## Laporan Publikasi Eksposur Risiko dan Permodalan untuk ATMR Risiko Kredit - Pendekatan Standar

## Publication Report on Risk Exposure and Capital for Credit Risk RWA - Standardized Approach

### Pengungkapan Kualitas Kredit atas Aset (CR1)

**Disclosure of Credit Quality of Assets (CR1)**

Periode Laporan : Desember 2024
Report Period : December 2024

### Bank Secara Konsolidasi dengan Entitas Anak

**The Bank consolidated with Subsidiaries**

| | | Nilai Tercatat Bruto<br>Gross Carrying Value | | CKPN<br>Allowance for Impairment Losses |
|---|---|---|---|---|
| | | Tagihan yang Telah Jatuh Tempo<br>Overdue Bills | Tagihan yang Belum Jatuh Tempo<br>Undue Bills | |
| | | a | b | c |
| 1 | Kredit | 87.075 | 14.611.628 | 484.482 |
| 2 | Surat Berharga | - | 22.629.220 | - |
| 3 | Transaksi Rekening Administratif | - | 4.395.592 | - |
| 4 | Penempatan | - | 16.472.477 | - |
| 5 | Aset Lainnya | - | 2.720.091 | - |
| 6 | Derivatif selain Kredit | - | 2.292 | - |
| **7** | **Total** | **87.075** | **60.831.301** | **484.482** |

| Pengungkapan Tambahan |
|---|
| Tagihan yang telah jatuh tempo merupakan seluruh tagihan yang telah tertunggak / jatuh tempo lebih dari 90 (sembilan puluh) hari, baik atas pembayaran pokok dan/atau pembayaran bunga atau tagihan kepada debitur yang wanprestasi. |

dalam jutaan Rupiah | in million Rupiah

| CKPN Allowance for Impairment Losses | | CKPN (Pendekatan IRB) Allowance for Impairment Losses (IRB Approach) | Nilai Bersih Net Worth (a+b-c) | |
|---|---|---|---|---|
| Stage 2 dan Stage 3 Stage 2 and Stage 3 | *Stage 1* | | | |
| d | e | f | g | |
| 478.244 | 6.238 | - | 14.214.222 | Credit |
| - | - | - | 22.629.220 | Securities |
| - | - | - | 4.395.592 | Administrative Account Transactions |
| - | - | - | 16.472.477 | Placement |
| - | - | - | 2.720.091 | Other Assets |
| - | - | - | 2.292 | Derivatives other than credit |
| **478.244** | **6.238** | **-** | **60.433.895** | **Total** |

| Additional Disclosure |
|---|
| Past Due Receivables are all receivables that have been overdue for more than 90 (ninety) days, including both principal and/or interest payments or receivables from defaulting debtors. |

### Bank Secara Individu
**Bank Individually**

| | | Nilai Tercatat Bruto<br>Gross Carrying Value | | CKPN<br>Allowance for Impairment Losses |
|---|---|---|---|---|
| | | Tagihan yang Telah Jatuh Tempo<br>Overdue Bills | Tagihan yang Belum Jatuh Tempo<br>Undue Bills | |
| | | a | b | c |
| 1 | Kredit | 80.179 | 11.136.516 | 478.093 |
| 2 | Surat Berharga | - | 17.635.535 | - |
| 3 | Transaksi Rekening Administratif | - | 4.395.342 | - |
| 4 | Penempatan | - | 14.878.937 | - |
| 5 | Aset Lainnya | - | 2.531.006 | - |
| 6 | Derivatif selain Kredit | - | 2.292 | - |
| **7** | **Total** | **80.179** | **50.579.629** | **478.093** |



## Laporan Publikasi Eksposur Risiko dan Permodalan untuk ATMR Risiko Kredit - Pendekatan Standar
**Publication Report on Risk Exposure and Capital for Credit Risk RWA - Standardized Approach**

### Pengungkapan Mutasi Kredit dan Surat Berharga yang Telah Jatuh Tempo (CR2)
**Disclosure of Changes in Due Loans and Securities (CR2)**

Periode Laporan : Desember 2024
Report Period : December 2024

### Bank Secara Konsolidasi dengan Entitas Anak
**The Bank consolidated with Subsidiaries**

dalam jutaan Rupiah | in million Rupiah

| No | Pos-Pos | a | Posts |
|---|---|---|---|
| 1 | Kredit dan Surat Berharga yang Telah Jatuh Tempo pada periode pelaporan terakhir | 95.500 | Due Loans and Securities on Last Reporting Period |
| 2 | Kredit dan Surat Berharga yang Telah Jatuh Tempo sejak periode pelaporan terakhir | 67.002 | Due Loans and Securities since Last Reporting Period |
| 3 | Kredit dan Surat Berharga yang kembali menjadi tagihan yang belum jatuh tempo | 5.799 | Loans and Securities that return to become undue bills |
| 4 | Nilai hapus buku | 68.866 | Write-Off Value |
| 5 | Perubahan lain | (761) | Other Changes |
| **6** | **Kredit dan Surat Berharga yang Telah Jatuh Tempo pada akhir periode pelaporan (1+2-3-4+5)** | **87.076** | **Due Loans and Securities on Last Reporting Period (1+2-3-4+5)** |

| Pengungkapan Tambahan | Additional Disclosure |
|---|---|
| Perubahan Nilai Kredit dan Surat Berharga yang Telah Jatuh Tempo disebabkan adanya metode perhitungan baru mengacu pada SEOJK Nomor 24/SEOJK.03/2021 tentang Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Kredit dengan Menggunakan Pendekatan Standar Bagi Bank Umum. | Changes in the Value of Credit and Past Due Securities are due to the new calculation method referring to SEOJK Number 24/SEOJK.03/2021 concerning the Calculation of Risk-Weighted Assets for Credit Risk Using the Standard Approach for Commercial Banks. |

### Bank Secara Individu
**Bank Individually**

dalam jutaan Rupiah | in million Rupiah

| No | Pos-Pos | a | Posts |
|---|---|---|---|
| 1 | Kredit dan Surat Berharga yang Telah Jatuh Tempo pada periode pelaporan terakhir | 88.740 | Due Loans and Securities on Last Reporting Period |
| 2 | Kredit dan Surat Berharga yang Telah Jatuh Tempo sejak periode pelaporan terakhir | 63.922 | Due Loans and Securities since Last Reporting Period |
| 3 | Kredit dan Surat Berharga yang kembali menjadi tagihan yang belum jatuh tempo | 4.977 | Loans and Securities that return to become undue bills |
| 4 | Nilai hapus buku | 66.996 | Write-Off Value |
| 5 | Perubahan lain | (510) | Other Changes |
| **6** | **Kredit dan Surat Berharga yang Telah Jatuh Tempo pada akhir periode pelaporan (1+2-3-4+5)** | **80.179** | **Due Loans and Securities on Last Reporting Period (1+2-3-4+5)** |

| CKPN Allowance for Impairment Losses | | CKPN (Pendekatan IRB) Allowance for Impairment Losses (IRB Approach) | Nilai Bersih Net Worth (a+b-c) | |
|---|---|---|---|---|
| Stage 2 dan Stage 3 Stage 2 and Stage 3 | *Stage 1* | | | |
| d | e | f | g | |
| 478.093 | - | | 10.738.603 | Credit |
| - | - | | 17.635.535 | Securities |
| - | - | | 4.395.342 | Administrative Account Transactions |
| - | - | | 14.878.937 | Placement |
| - | - | | 2.531.006 | Other Assets |
| - | - | | 2.292 | Derivatives other than credit |
| **478.093** | **-** | **-** | **50.181.716** | **Total** |



## Laporan Publikasi Eksposur Risiko dan Permodalan untuk ATMR Risiko Kredit - Pendekatan Standar

**Publication Report on Risk Exposure and Capital for Credit Risk RWA - Standardized Approach**

### Pengungkapan Tambahan terkait Kualitas Kredit atas Aset (CRB)

**Additional Disclosure of Credit Quality of Assets (CRB)**

Periode Laporan : Desember 2024
Report Period : December 2024

### Bank Secara Konsolidasi dengan Entitas Anak

**The Bank consolidated with Subsidiaries**

| Analisa Kualitatif | Qualitative Analysis |
|---|---|
| Tagihan yang telah jatuh tempo merupakan seluruh tagihan yang telah jatuh tempo lebih dari 90 (sembilan puluh) hari, baik atas pembayaran pokok dan/atau pembayaran bunga. Tagihan yang mengalami penurunan nilai adalah tagihan yang termasuk pada stage 2 dan stage 3 pada perhitungan CKPN, yakni seluruh tagihan yang telah jatuh tempo lebih dari 30 (tiga puluh) hari, baik atas pembayaran pokok dan/atau pembayaran bunga. Dengan kata lain, seluruh tagihan yang telah jatuh tempo merupakan bagian dari tagihan yang mengalami penurunan nilai.<br><br>Perusahaan telah mengimplementasikan PSAK No. 71 sejak Januari 2020 dalam hal pembentukan cadangan kerugian penurunan nilai (CKPN) sesuai dengan penetapan Dewan Standar Akuntansi Keuangan Ikatan Akuntan Indonesia (DSAK IAI). CKPN yang dibentuk dengan menggunakan metode Expected Credit Loss sesuai dengan ketentuan PSAK No. 71 menghitung penurunan nilai pada Portofolio Kredit, Treasury dan Trade Finance setiap bulan, baik untuk on balance sheet maupun off balance sheet. Perusahaan melakukan permodelan PD, LGD, EAD dan Forward Looking Macroeconomic untuk semua segmentasi portofolio instrumen keuangan sesuai dengan metodologi yang telah ditentukan oleh Perusahaan. | Past Due Receivables are all receivables that have been overdue for more than 90 (ninety) days, including both principal and/or interest payments. Receivables that experience a decline in value are those classified as stage 2 and stage 3 in the calculation of Allowance for Impairment Losses (CKPN), which includes all receivables that have been overdue for more than 30 (thirty) days, whether for principal and/or interest payments. In other words, all past due receivables are part of the receivables that have experienced a decline in value.<br><br>The company has implemented PSAK No. 71 since January 2020 regarding the establishment of the allowance for impairment losses (CKPN) in accordance with the provisions set by the Financial Accounting Standards Board of the Indonesian Institute of Accountants (DSAK IAI). The CKPN is established using the Expected Credit Loss method in accordance with PSAK No. 71, which calculates impairment on the Credit, Treasury, and Trade Finance Portfolios monthly, for both on-balance sheet and off-balance sheet items. The company conducts modeling for Probability of Default (PD), Loss Given Default (LGD), Exposure at Default (EAD), and Forward Looking Macroeconomic factors for all segments of the financial instrument portfolio in accordance with the methodology established by the company. |

## Laporan Publikasi Eksposur Risiko dan Permodalan untuk ATMR Risiko Kredit - Pendekatan Standar

**Publication Report on Risk Exposure and Capital for Credit Risk RWA - Standardized Approach**

### Pengungkapan Tagihan Bersih Berdasarkan Wilayah

**Disclosure of Net Receivables by Area**

Periode Laporan : Desember 2024
Report Period : December 2024

### Bank Secara Konsolidasi dengan Entitas Anak

**The Bank consolidated with Subsidiaries**

| No | Kategori Portofolio | Posisi Tanggal Laporan / Report Date | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | Tagihan Bersih Berdasarkan Wilayah / Net Receivables by Area | | | | | | |
| | | Wilayah-01 Region-01 | Wilayah-02 Region-02 | Wilayah-03 Region-03 | Wilayah-04 Region-04 | Wilayah-05 Region-05 | Wilayah-06 Region-06 | Wilayah-07 Region-07 |
| a | b | c | d | e | f | f | g | h |
| 1 | Tagihan Kepada Pemerintah | - | - | 20.895.065 | - | 6.777.502 | - | - |
| 2 | Tagihan kepada Entitas Sektor Publik | - | - | 2.009.545 | - | - | - | - |
| 3 | Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional | - | - | - | - | - | - | - |
| 4 | Tagihan kepada Bank | 5 | 5 | 4.667.172 | - | 787.807 | - | - |
| 5 | Tagihan berupa Covered Bond | - | - | - | - | - | - | - |
| 6 | Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya | - | - | 929.696 | - | 0 | - | - |
| 7 | Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya | - | - | - | - | - | - | - |
| 8 | Kredit Beragun Rumah Tinggal | 828 | - | 17.516 | 35.723 | 76.169 | 6.320 | 1.137 |
| 9 | Kredit Beragun Properti Komersial | - | - | - | - | - | - | - |
| 10 | Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi | 12.241 | 122.419 | 25.434 | 49.159 | 53.078 | - | - |
| 11 | Kredit Pegawai atau Pensiunan | - | - | - | - | - | - | - |
| 12 | Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel | 487.653 | 857.565 | 700.772 | 249.670 | 102.687 | 442.432 | 405.481 |
| 13 | Tagihan kepada Korporasi | 56.150 | 52.857 | 10.702.972 | 116.244 | 1.969.416 | 109.392 | 44.349 |
| 14 | Tagihan yang Telah Jatuh Tempo | 2.742 | 5.629 | 4.750 | 1.836 | 822 | 6.633 | 4.377 |
| 15 | Aset Lainnya | - | - | - | - | 2.720.091 | - | - |
| | **TOTAL** | **559.619** | **1.038.475** | **39.952.922** | **452.632** | **12.487.572** | **564.777** | **455.344** |

dalam jutaan Rupiah | in million Rupiah

| Wilayah-08 Region-08 | Wilayah-09 Region-09 | Wilayah-10 Region-10 | Wilayah-11 Region-11 | Wilayah-12 Region-12 | Wilayah-13 Region-13 | Wilayah-14 Region-14 | Total | Portfolio Category |
|---|---|---|---|---|---|---|---|---|
| i | j | k | l | l | m | n | o | |
| - | - | - | - | - | - | - | 27.672.567 | Receivables from Government |
| - | - | - | - | - | - | - | 2.009.545 | Receivables from Public Sector Entities |
| - | - | - | - | - | - | - | - | Receivables from Multilateral Development Banks and International Institutions |
| - | 4 | - | - | - | - | - | 5.454.993 | Receivables from Banks |
| - | - | - | - | - | - | - | - | Receivables from Covered Bond |
| - | - | - | - | - | - | - | 929.696 | Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya |
| - | - | - | - | - | - | - | - | Receivables from Securities Companies and Other Financial Services Institutions |
| 2.456 | - | - | - | - | - | - | 140.149 | Commercial Property Collateralized Loans |
| 133 | - | - | - | - | - | - | 133 | Commercial Property Backed Loans |
| 2.000 | - | - | - | - | - | - | 264.331 | Land Acquisition, Land Processing and Construction Loans |
| - | - | - | - | - | - | - | - | Employee or Retairement Loans |
| 560.245 | 361.376 | 270.820 | - | - | - | - | 4.438.701 | Receivables from Microbusiness,Small Business, and Retail Portfolio |
| 199.174 | 16.875 | 44.352 | - | - | - | - | 13.311.781 | Receivables from Corporations |
| 7.879 | 5.584 | 2.382 | - | - | - | - | 42.634 | Due Receivables |
| - | - | - | - | - | - | - | 2.720.091 | Other Assets |
| **771.887** | **383.839** | **317.554** | **-** | **-** | **-** | **-** | **56.984.621** | **TOTAL** |

| No | Kategori Portofolio | Posisi Tanggal Laporan Tahun Sebelumnya<br>Previous Year Report Date Position | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | Tagihan Bersih Berdasarkan Wilayah<br>Net Receivables by Area | | | | | | |
| | | **Wilayah-01**<br>Region-01 | **Wilayah-02**<br>Region-02 | **Wilayah-03**<br>Region-03 | **Wilayah-04**<br>Region-04 | **Wilayah-05**<br>Region-05 | **Wilayah-06**<br>Region-06 | **Wilayah-07**<br>Region-07 |
| a | b | c | d | e | f | f | g | h |
| 1 | Tagihan Kepada Pemerintah | - | - | - | - | 24.157.992 | - | - |
| 2 | Tagihan kepada Entitas Sektor Publik | - | - | - | - | 2.210.968 | - | - |
| 3 | Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional | - | - | - | - | - | - | - |
| 4 | Tagihan kepada Bank | 5 | 5 | - | - | 2.831.842 | - | - |
| 5 | Tagihan berupa Covered Bond | - | - | - | - | - | - | - |
| 6 | Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya | - | - | - | - | 1.001.786 | - | - |
| 7 | Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya | - | - | - | - | - | - | - |
| 8 | Kredit Beragun Rumah Tinggal | 975 | - | 2.272 | - | 4.103 | 330 | - |
| 9 | Kredit Beragun Properti Komersial | - | - | - | - | - | - | - |
| 10 | Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi | 1.524 | 19.641 | - | - | 14.593 | 400 | 2.977 |
| 11 | Kredit Pegawai atau Pensiunan | - | - | - | - | - | - | - |
| 12 | Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel | 523.695 | 914.292 | 129.208 | 55.920 | 549.614 | 602.489 | 487.171 |
| 13 | Tagihan kepada Korporasi | 50.794 | 82.501 | 85.460 | - | 15.109.697 | 10.811 | 35.960 |
| 14 | Tagihan yang Telah Jatuh Tempo | 5.183 | 8.851 | 1.060 | 919 | 3.191 | 9.973 | 5.263 |
| 15 | Aset Lainnya | - | - | - | - | 3.001.980 | - | - |
| | **TOTAL** | **582.176** | **1.025.290** | **218.000** | **56.839** | **48.885.766** | **624.003** | **531.371** |

dalam jutaan Rupiah | in million Rupiah

| Wilayah-08 Region-08 | Wilayah-09 Region-09 | Wilayah-10 Region-10 | Wilayah-11 Region-11 | Wilayah-12 Region-12 | Wilayah-13 Region-13 | Wilayah-14 Region-14 | Total | Portfolio Category |
|---|---|---|---|---|---|---|---|---|
| i | j | k | l | l | m | n | o | |
| - | - | - | - | - | - | - | 24.157.992 | Receivables from Government |
| - | - | - | - | - | - | - | 2.210.968 | Receivables from Public Sector Entities |
| - | - | - | - | - | - | - | - | Receivables from Multilateral Development Banks and International Institutions |
| 4.630 | - | 4 | - | - | - | - | 2.836.486 | Receivables from Banks |
| - | - | - | - | - | - | - | - | Receivables from Covered Bond |
| - | - | - | - | - | 94 | - | 1.001.880 | Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya |
| - | - | - | - | - | - | - | - | Receivables from Securities Companies and Other Financial Services Institutions |
| 547 | - | - | - | - | - | - | 8.227 | Commercial Property Collateralized Loans |
| 142 | - | - | - | - | - | - | 142 | Commercial Property Backed Loans |
| 2.057 | - | - | - | - | 22.841 | 31.721 | 95.754 | Land Acquisition, Land Processing and Construction Loans |
| - | - | - | - | - | - | - | - | Employee or Retairement Loans |
| 345.972 | 344.282 | 478.517 | 359.919 | - | 210.656 | 10.244 | 5.011.979 | Receivables from Microbusiness,Small Business, and Retail Portfolio |
| 118.726 | 11.032 | 37.931 | 33.072 | - | 80.272 | 63.818 | 15.720.074 | Receivables from Corporations |
| 4.869 | 5.077 | 5.469 | 2.461 | - | 3.859 | 209 | 56.384 | Due Receivables |
| - | - | - | - | - | - | - | 3.001.980 | Other Assets |
| **476.943** | **360.391** | **521.921** | **395.452** | **-** | **317.722** | **105.992** | **54.101.866** | **TOTAL** |

## Bank Secara Individu
**Bank Individually**

| No | Kategori Portofolio | Posisi Tanggal Laporan Report Date | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | Tagihan Bersih Berdasarkan Wilayah Net Receivables by Area | | | | | | |
| | | Wilayah-01 Region-01 | Wilayah-02 Region-02 | Wilayah-03 Region-03 | Wilayah-04 Region-04 | Wilayah-05 Region-05 | Wilayah-06 Region-06 | Wilayah-07 Region-07 |
| a | b | c | d | e | f | f | g | h |
| 1 | Tagihan Kepada Pemerintah | - | - | 20.895.065 | - | - | - | - |
| 2 | Tagihan kepada Entitas Sektor Publik | - | - | 2.009.545 | - | - | - | - |
| 3 | Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional | - | - | - | - | - | - | - |
| 4 | Tagihan kepada Bank | 5 | 5 | 4.667.172 | - | - | - | - |
| 5 | Tagihan berupa Covered Bond | - | - | - | - | - | - | - |
| 6 | Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya | - | - | 929.696 | - | 0 | - | - |
| 7 | Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya | - | - | - | - | - | - | - |
| 8 | Kredit Beragun Rumah Tinggal | 828 | - | 17.516 | 35.723 | 71.258 | 6.320 | 1.137 |
| 9 | Kredit Beragun Properti Komersial | - | - | - | - | - | - | - |
| 10 | Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi | 12.241 | 122.419 | 25.434 | 49.159 | 53.078 | - | - |
| 11 | Kredit Pegawai atau Pensiunan | - | - | - | - | - | - | - |
| 12 | Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel | 313.212 | 681.505 | 608.497 | 166.484 | 45.650 | 442.432 | 405.481 |
| 13 | Tagihan kepada Korporasi | 56.150 | 43.808 | 10.702.972 | 116.244 | 69.393 | 109.392 | 44.349 |
| 14 | Tagihan yang Telah Jatuh Tempo | 2.480 | 5.500 | 4.715 | 1.634 | 772 | 6.633 | 4.377 |
| 15 | Aset Lainnya | - | - | - | - | 2.531.006 | - | - |
| | **TOTAL** | **384.916** | **853.237** | **39.860.612** | **369.244** | **2.771.157** | **564.777** | **455.344** |

dalam jutaan Rupiah | in million Rupiah

| Wilayah-08 Region-08 | Wilayah-09 Region-09 | Wilayah-10 Region-10 | Wilayah-11 Region-11 | Wilayah-12 Region-12 | Wilayah-13 Region-13 | Wilayah-14 Region-14 | Total | Portfolio Category |
|---|---|---|---|---|---|---|---|---|
| i | j | k | l | l | m | n | o | |
| - | - | - | - | - | - | - | 20.895.065 | Receivables from Government |
| - | - | - | - | - | - | - | 2.009.545 | Receivables from Public Sector Entities |
| - | - | - | - | - | - | - | - | Receivables from Multilateral Development Banks and International Institutions |
| - | 4 | - | - | - | - | - | 4.667.186 | Receivables from Banks |
| - | - | - | - | - | - | - | - | Receivables from Covered Bond |
| - | - | - | - | - | - | - | 929.696 | Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya |
| - | - | - | - | - | - | - | - | Receivables from Securities Companies and Other Financial Services Institutions |
| 2.456 | - | - | - | - | - | - | 135.238 | Commercial Property Collateralized Loans |
| 133 | - | - | - | - | - | - | 133 | Commercial Property Backed Loans |
| 2.000 | - | - | - | - | - | - | 264.331 | Land Acquisition, Land Processing and Construction Loans |
| - | - | - | - | - | - | - | - | Employee or Retairement Loans |
| 560.245 | 361.376 | 270.820 | - | - | - | - | 3.855.702 | Receivables from Microbusiness,Small Business, and Retail Portfolio |
| 199.174 | 16.875 | 44.352 | - | - | - | - | 11.402.709 | Receivables from Corporations |
| 7.879 | 5.584 | 2.382 | - | - | - | - | 41.956 | Due Receivables |
| - | - | - | - | - | - | - | 2.531.006 | Other Assets |
| **771.887** | **383.839** | **317.554** | **-** | **-** | **-** | **-** | **46.732.567** | **TOTAL** |

| No | Kategori Portofolio | Posisi Tanggal Laporan Tahun Sebelumnya<br>Previous Year Report Date Position | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | Tagihan Bersih Berdasarkan Wilayah<br>Net Receivables by Area | | | | | | |
| | | Wilayah-01<br>Region-01 | Wilayah-02<br>Region-02 | Wilayah-03<br>Region-03 | Wilayah-04<br>Region-04 | Wilayah-05<br>Region-05 | Wilayah-06<br>Region-06 | Wilayah-07<br>Region-07 |
| a | b | c | d | e | f | f | g | h |
| 1 | Tagihan Kepada Pemerintah | - | - | - | - | 21.799.569 | - | - |
| 2 | Tagihan kepada Entitas Sektor Publik | - | - | - | - | 2.210.968 | - | - |
| 3 | Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional | - | - | - | - | - | - | - |
| 4 | Tagihan kepada Bank | 5 | 5 | - | - | 2.831.842 | - | - |
| 5 | Tagihan berupa Covered Bond | - | - | - | - | - | - | - |
| 6 | Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya | - | - | - | - | 1.001.786 | - | - |
| 7 | Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya | - | - | - | - | - | - | - |
| 8 | Kredit Beragun Rumah Tinggal | 975 | - | 2.272 | - | - | 330 | - |
| 9 | Kredit Beragun Properti Komersial | - | - | - | - | - | - | - |
| 10 | Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi | 1.524 | 19.641 | - | - | 14.593 | 400 | 2.977 |
| 11 | Kredit Pegawai atau Pensiunan | - | - | - | - | - | - | - |
| 12 | Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel | 382.912 | 810.626 | 73.849 | - | 523.567 | 602.489 | 487.171 |
| 13 | Tagihan kepada Korporasi | 50.794 | 82.501 | 85.460 | - | 12.068.660 | 10.811 | 35.960 |
| 14 | Tagihan yang Telah Jatuh Tempo | 4.074 | 7.435 | - | - | 3.173 | 9.973 | 5.263 |
| 15 | Aset Lainnya | - | - | - | - | 2.854.488 | - | - |
| | **TOTAL** | **440.284** | **920.208** | **161.581** | **-** | **43.308.646** | **624.003** | **531.371** |

dalam jutaan Rupiah | in million Rupiah

| Wilayah-08 Region-08 | Wilayah-09 Region-09 | Wilayah-10 Region-10 | Wilayah-11 Region-11 | Wilayah-12 Region-12 | Wilayah-13 Region-13 | Wilayah-14 Region-14 | Total | Portfolio Category |
|---|---|---|---|---|---|---|---|---|
| i | j | k | l | l | m | n | o | |
| - | - | - | - | - | - | - | 21.799.569 | Receivables from Government |
| - | - | - | - | - | - | - | 2.210.968 | Receivables from Public Sector Entities |
| - | - | - | - | - | - | - | - | Receivables from Multilateral Development Banks and International Institutions |
| 4.630 | - | 4 | - | - | - | - | 2.836.486 | Receivables from Banks |
| - | - | - | - | - | - | - | - | Receivables from Covered Bond |
| - | - | - | - | - | 94 | - | 1.001.880 | Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya |
| - | - | - | - | - | - | - | - | Receivables from Securities Companies and Other Financial Services Institutions |
| 547 | - | - | - | - | - | - | 4.124 | Commercial Property Collateralized Loans |
| 142 | - | - | - | - | - | - | 142 | Commercial Property Backed Loans |
| 2.057 | - | - | - | - | 22.841 | 31.721 | 95.754 | Land Acquisition, Land Processing and Construction Loans |
| - | - | - | - | - | - | - | - | Employee or Retairement Loans |
| 345.972 | 344.282 | 478.517 | 359.919 | - | 210.656 | 10.244 | 4.630.204 | Receivables from Microbusiness,Small Business, and Retail Portfolio |
| 118.726 | 11.032 | 37.931 | 33.072 | - | 80.272 | 63.818 | 12.679.037 | Receivables from Corporations |
| 4.869 | 5.077 | 5.469 | 2.461 | - | 3.859 | 209 | 51.862 | Due Receivables |
| - | - | - | - | - | - | - | 2.854.488 | Other Assets |
| **476.943** | **360.391** | **521.921** | **395.452** | **-** | **317.722** | **105.992** | **48.164.514** | **TOTAL** |

## Laporan Publikasi Eksposur Risiko dan Permodalan untuk ATMR Risiko Kredit - Pendekatan Standar

**Publication Report on Risk Exposure and Capital for Credit Risk RWA - Standardized Approach**

### Pengungkapan Tagihan dan Pencadangan Berdasarkan Wilayah

Disclosure of Receivables and Allowances by Area

Periode Laporan : Desember 2024
Report Period : December 2024

### Bank Secara Konsolidasi dengan Entitas Anak

The Bank consolidated with Subsidiaries

| No. | Keterangan | Posisi Tanggal Laporan / Report Date | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | Wilayah / Area | | | | | | |
| | | Wilayah-01 Region-01 | Wilayah-02 Region-02 | Wilayah-03 Region-03 | Wilayah-04 Region-04 | Wilayah-05 Region-05 | Wilayah-06 Region-06 | Wilayah-07 Region-07 |
| a | b | c | d | e | f | g | h | i |
| 1 | Tagihan | 747.242 | 1.223.510 | 42.666.071 | 675.282 | 12.621.374 | 3 | 511.138 |
| 2 | Tagihan yang Mengalami Penurunan Nilai | - | - | - | - | - | - | - |
| | a. Belum Jatuh Tempo | 80 | - | 108 | 9 | - | - | - |
| | b. Telah Jatuh Tempo | 6.816 | 12.470 | 13.012 | 3.762 | 1.563 | 12.700 | 8.244 |
| 3 | CKPN - *Stage* 1 | 2.211 | 2.069 | 1.356 | 583 | 18 | - | - |
| 4 | CKPN - *Stage 2* | 1.827 | 3.958 | 280.595 | 1.822 | 291 | 4.464 | 3.379 |
| 5 | CKPN - *Stage 3* | 1.931 | 4.772 | 135.882 | 1.345 | 1.021 | 6.069 | 3.877 |
| 6 | Tagihan yang Dihapus Buku | - | - | - | - | - | - | - |

| No. | Keterangan | Posisi Tanggal Laporan Tahun Sebelumnya / Previous Year Report Date Position | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | Wilayah / Area | | | | | | |
| | | Wilayah-01 Region-01 | Wilayah-02 Region-02 | Wilayah-03 Region-03 | Wilayah-04 Region-04 | Wilayah-05 Region-05 | Wilayah-06 Region-06 | Wilayah-07 Region-07 |
| a | b | c | d | e | f | g | h | i |
| 1 | Tagihan | 760.512 | 1.190.994 | 406.127 | 56.840 | 50.817.831 | 3 | 595.088 |
| 2 | Tagihan yang Mengalami Penurunan Nilai | 96.694 | 130.193 | 17.653 | - | 629.928 | 157.323 | 83.930 |
| | a. Belum Jatuh Tempo | 88.948 | 116.340 | 17.653 | - | 621.049 | 137.822 | 73.080 |
| | b. Telah Jatuh Tempo | 7.746 | 13.853 | - | - | 8.879 | 19.501 | 10.850 |
| 3 | CKPN - *Stage* 1 | 138 | 81 | 54 | 83 | 331.192 | - | - |
| 4 | CKPN - *Stage 2* | 4.005 | 7.472 | 3.235 | - | 296.813 | 7.879 | 5.209 |
| 5 | CKPN - *Stage 3* | 3.685 | 6.465 | 1.310 | - | 154.598 | 10.018 | 6.043 |
| 6 | Tagihan yang Dihapus Buku | 106.423 | 70.582 | 74.501 | 27.355 | 5.135.050 | 129.732 | 76.494 |

dalam jutaan Rupiah | in million Rupiah

| Wilayah-08 Region-08 | Wilayah-09 Region-09 | Wilayah-10 Region-10 | Wilayah-11 Region-11 | Wilayah-12 Region-12 | Wilayah-13 Region-13 | Wilayah-14 Region-14 | Total | Description |
|---|---|---|---|---|---|---|---|---|
| j | k | l | m | n | o | p | q | |
| 1.059.911 | 444.598 | 381.877 | - | - | - | - | **60.911.281** | Receivables |
| - | - | - | - | - | - | - | **-** | "Claims with Increased and Worsening Credit Risk" |
| - | - | - | - | - | - | - | **197** | a. Not Due |
| 14.432 | 9.845 | 4.232 | - | - | - | - | **87.076** | b. Due |
| - | - | - | - | - | - | - | **6.237** | Allowance for Impairment Losses Stage 1 |
| 5.982 | 5.570 | 2.178 | - | - | - | - | **310.066** | Allowance for Impairment Losses Stage 2 |
| 7.159 | 4.272 | 1.850 | - | - | - | - | **168.179** | Allowance for Impairment Losses Stage 3 |
| - | - | - | - | - | - | - | **-** | Receivables Written Off |

dalam jutaan Rupiah | in million Rupiah

| Wilayah-08 Region-08 | Wilayah-09 Region-09 | Wilayah-10 Region-10 | Wilayah-11 Region-11 | Wilayah-12 Region-12 | Wilayah-13 Region-13 | Wilayah-14 Region-14 | Total | Description |
|---|---|---|---|---|---|---|---|---|
| j | k | l | m | n | o | p | q | |
| 709.715 | 408.305 | 615.274 | 459.386 | - | 476.792 | 274.049 | **57.415.506** | Receivables |
| 84.021 | 96.172 | 177.873 | 77.990 | - | 50.686 | 731 | **1.603.194** | "Claims with Increased and Worsening Credit Risk" |
| 74.945 | 86.930 | 167.456 | 73.385 | - | 43.525 | 340 | **1.501.473** | a. Not Due |
| 9.076 | 9.242 | 10.417 | 4.605 | - | 7.161 | 391 | **101.721** | b. Due |
| - | - | - | - | - | - | - | **331.548** | Allowance for Impairment Losses Stage 1 |
| 4.235 | 4.380 | 9.119 | 2.953 | - | 2.054 | 11 | **347.365** | Allowance for Impairment Losses Stage 2 |
| 4.317 | 4.693 | 5.000 | 2.235 | - | 3.375 | 182 | **201.920** | Allowance for Impairment Losses Stage 3 |
| 41.778 | 31.490 | 56.677 | 32.878 | 637 | 65.296 | 5.226 | **5.854.119** | Receivables Written Off |

## Bank Secara Individu
**Bank Individually**

| No. | Keterangan | Posisi Tanggal Laporan<br>Report Date | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | Wilayah<br>Area | | | | | | |
| | | **Wilayah-01**<br>Region-01 | **Wilayah-02**<br>Region-02 | **Wilayah-03**<br>Region-03 | **Wilayah-04**<br>Region-04 | **Wilayah-05**<br>Region-05 | **Wilayah-06**<br>Region-06 | **Wilayah-07**<br>Region-07 |
| **a** | **b** | **c** | **d** | **e** | **f** | **g** | **h** | **i** |
| 1 | Tagihan | 572.816 | 1.038.402 | 42.573.800 | 592.103 | 2.904.884 | 580.278 | 511.138 |
| 2 | Tagihan yang Mengalami Penurunan Nilai | | | | | | | |
| | a. Belum Jatuh Tempo | - | - | - | - | - | - | - |
| | b. Telah Jatuh Tempo | 4.365 | 10.248 | 11.722 | 2.904 | 1.487 | 12.700 | 8.244 |
| 3 | CKPN - *Stage* 1 | - | - | - | - | - | - | - |
| 4 | CKPN - *Stage 2* | 1.827 | 3.958 | 280.595 | 1.822 | 291 | 4.464 | 3.379 |
| 5 | CKPN - *Stage 3* | 1.890 | 4.748 | 135.878 | 1.270 | 1.013 | 6.069 | 3.877 |
| 6 | Tagihan yang Dihapus Buku | - | - | - | - | - | - | - |

| No. | Keterangan | Posisi Tanggal Laporan Tahun Sebelumnya<br>Previous Year Report Date Position | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | Wilayah<br>Area | | | | | | |
| | | **Wilayah-01**<br>Region-01 | **Wilayah-02**<br>Region-02 | **Wilayah-03**<br>Region-03 | **Wilayah-04**<br>Region-04 | **Wilayah-05**<br>Region-05 | **Wilayah-06**<br>Region-06 | **Wilayah-07**<br>Region-07 |
| **a** | **b** | **c** | **d** | **e** | **f** | **g** | **h** | **i** |
| 1 | Tagihan | 618.621 | 1.085.912 | 349.708 | - | 45.092.743 | 644.593 | 595.088 |
| 2 | Tagihan yang Mengalami Penurunan Nilai | 96.694 | 130.193 | 17.653 | - | 629.928 | 157.323 | 83.930 |
| | a. Belum Jatuh Tempo | 88.948 | 116.340 | 17.653 | - | 621.049 | 137.822 | 73.080 |
| | b. Telah Jatuh Tempo | 7.746 | 13.853 | - | - | 8.879 | 19.501 | 10.850 |
| 3 | CKPN - *Stage* 1 | - | - | - | - | - | - | - |
| 4 | CKPN - *Stage 2* | 4.005 | 7.472 | 3.235 | - | 296.813 | 7.879 | 5.209 |
| 5 | CKPN - *Stage 3* | 3.685 | 6.465 | 1.310 | - | 6.629 | 10.018 | 6.043 |
| 6 | Tagihan yang Dihapus Buku | 100.235 | 57.266 | 58.391 | - | 4.889.659 | 129.732 | 76.494 |

dalam jutaan Rupiah | in million Rupiah

| Wilayah-08 Region-08 | Wilayah-09 Region-09 | Wilayah-10 Region-10 | Wilayah-11 Region-11 | Wilayah-12 Region-12 | Wilayah-13 Region-13 | Wilayah-14 Region-14 | Total | Description |
|---|---|---|---|---|---|---|---|---|
| j | k | l | m | n | o | p | q | |
| 1.059.911 | 444.598 | 381.877 | - | - | - | - | **50.659.807** | Receivables |
| | | | | | | | - | "Claims with Increased and Worsening Credit Risk" |
| - | - | - | - | - | - | - | - | a. Not Due |
| 14.432 | 9.845 | 4.232 | - | - | - | - | **80.179** | b. Due |
| - | - | - | - | - | - | - | - | Allowance for Impairment Losses Stage 1 |
| 5.982 | 5.570 | 2.178 | - | - | - | - | **310.066** | Allowance for Impairment Losses Stage 2 |
| 7.159 | 4.272 | 1.850 | - | - | - | - | **168.027** | Allowance for Impairment Losses Stage 3 |
| - | - | - | - | - | - | - | - | Receivables Written Off |

dalam jutaan Rupiah | in million Rupiah

| Wilayah-08 Region-08 | Wilayah-09 Region-09 | Wilayah-10 Region-10 | Wilayah-11 Region-11 | Wilayah-12 Region-12 | Wilayah-13 Region-13 | Wilayah-14 Region-14 | Total | Description |
|---|---|---|---|---|---|---|---|---|
| j | k | l | m | n | o | p | q | |
| 709.715 | 408.305 | 615.274 | 459.386 | - | 476.792 | 274.049 | **51.330.186** | Receivables |
| 84.021 | 96.172 | 177.873 | 77.990 | - | 50.686 | 731 | **1.603.194** | "Claims with Increased and Worsening Credit Risk" |
| 74.945 | 86.930 | 167.456 | 73.385 | - | 43.525 | 340 | **1.501.473** | a. Not Due |
| 9.076 | 9.242 | 10.417 | 4.605 | - | 7.161 | 391 | **101.721** | b. Due |
| - | - | - | - | - | - | - | - | Allowance for Impairment Losses Stage 1 |
| 4.235 | 4.380 | 9.119 | 2.953 | - | 2.054 | 11 | **347.365** | Allowance for Impairment Losses Stage 2 |
| 4.317 | 4.693 | 5.000 | 2.235 | - | 3.375 | 182 | **53.951** | Allowance for Impairment Losses Stage 3 |
| 41.778 | 31.490 | 56.677 | 32.878 | 637 | 65.296 | 5.226 | **5.545.759** | Receivables Written Off |

# Laporan Publikasi Eksposur Risiko dan Permodalan untuk ATMR Risiko Kredit - Pendekatan Standar

## Publication Report on Risk Exposure and Capital for Credit Risk RWA - Standardized Approach

### Pengungkapan Tagihan Bersih Berdasarkan Sektor Ekonomi

Disclosure of Net Receivables by Economic Sector

Periode Laporan : Desember 2024
Report Period : December 2024

### Bank Secara Konsolidasi dengan Entitas Anak

The Bank consolidated with Subsidiaries

| No. | Sektor Ekonomi | 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, Equity and Other Capital Instruments |
|---|---|---|---|---|---|---|---|---|
| a | b | c | d | e | f | g | h | i |
| | **Posisi Tanggal Laporan** | | | | | | | |
| 1 | Pertanian, Kehutanan dan Perikanan | - | - | - | - | - | - | - |
| 2 | Pertambangan dan Penggalian | - | - | - | - | - | - | - |
| 3 | Industri Pengolahan | - | - | - | - | - | - | - |
| 4 | Pengadaan Listrik, Gas, Uap/Air Panas dan Udara Dingin | - | - | - | - | - | - | - |
| 5 | Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah, dan Aktivitas Remediasi | - | - | - | - | - | - | - |
| 6 | Konstruksi | 1.046.391 | - | - | - | - | - | - |
| 7 | Perdagangan Besar dan Eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor | - | - | - | - | - | - | - |
| 8 | Pengangkutan dan Pergudangan | - | - | - | - | - | - | - |
| 9 | Penyediaan Akomodasi dan Penyediaan Makan Minum | - | - | - | - | - | - | - |
| 10 | Informasi dan Komunikasi | 6.730.237 | - | - | 787.807 | - | - | - |
| 11 | Aktivitas Keuangan dan Asuransi | 19.895.939 | 2.009.545 | - | 4.667.186 | - | 929.696 | - |
| 12 | Real Estat | - | - | - | - | - | - | - |
| 13 | Aktivitas Profesional, Ilmiah dan Teknis | - | - | - | - | - | - | - |
| 14 | Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Ketenagakerjaan, Agen Perjalanan dan Penunjang Usaha Lainnya | - | - | - | - | - | - | - |
| 15 | Administrasi Pemerintahan, Pertahanan dan Jaminan Sosial Wajib | - | - | - | - | - | - | - |
| 16 | Pendidikan | - | - | - | - | - | - | - |
| 17 | Aktivitas Kesehatan Manusia dan Aktivitas Sosial | - | - | - | - | - | - | - |
| 18 | Kesenian, Hiburan dan Rekreasi | - | - | - | - | - | - | - |
| 19 | Aktivitas Jasa Lainnya | - | - | - | - | - | - | - |
| 20 | Aktivitas Rumah Tangga sebagai Pemberi Kerja; Aktivitas yang Menghasilkan Barang dan Jasa oleh Rumah Tangga yang Digunakan untuk Memenuhi Kebutuhan Sendiri | - | - | - | - | - | - | - |
| 21 | Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya | - | - | - | - | - | - | - |
| 22 | Rumah Tangga | - | - | - | - | - | - | - |
| 23 | Bukan Lapangan Usaha Lainnya | - | - | - | - | - | - | - |
| 24 | Lainnya | - | - | - | - | - | - | - |
| | **Total** | **27.672.567** | **2.009.545** | **-** | **5.454.993** | **-** | **929.696** | **-** |

dalam jutaan Rupiah | in million Rupiah

| j | k | l | m | n | o | p | q | Economic Sector |
|---|---|---|---|---|---|---|---|---|
| **Kredit Beragun Properti Rumah Tinggal** Residential Property Collateralized Loans | **Kredit Beragun Properti Komersial** Commercial Property Collateralized Loans | **Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi** Land Acquisition, Land Processing and Construction Loans | **Kredit Pegawai atau Pensiunan** Employee or Retirement Loans | **Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel** Receivables from Micro, Small and Retail Portfolios | **Tagihan kepada Korporasi** Receivables from Corporations | **Tagihan yang Telah Jatuh Tempo** Due Receivables | **Aset Lainnya** Other Assets | |
| | | | | | | | | **Report Date Position** |
| - | - | - | - | 359.317 | 31.259 | 1.537 | - | Agriculture, Forestry, and Fishery |
| - | - | - | - | 52.055 | 860.393 | - | - | Mining and Extractive Industries |
| 1.035 | - | - | - | 101.939 | 441.084 | 1.693 | - | Processing Industry |
| - | - | - | - | 4.561 | - | - | - | Procurement of Electricity, Gas, Steam/Hot Water, and Cold Air |
| - | - | - | - | 9.874 | 203.500 | - | - | Water Management, Wastewater Management, Waste Management and Recycling, and Remediation Activities |
| - | - | 264.331 | - | 283.186 | 1.331.878 | 89 | - | Construction |
| 6.460 | - | - | - | 745.188 | 3.932.268 | 8.711 | - | "Wholesale and Retail Trade, Car and Motorcycle Repair and Maintenance" |
| - | - | - | - | 58.919 | 162.112 | 286 | - | Transportation and Warehousing |
| 704 | - | - | - | 91.760 | 14.804 | 267 | - | Provision of Accommodation and Foods & Beverages |
| - | - | - | - | 2.591 | 168.337 | 56 | - | Information and Communication |
| - | - | - | - | 29.551 | 5.574.238 | 18 | - | Financial and Insurance Activities |
| - | - | - | - | 11.261 | 275.751 | - | - | Real Estate |
| - | - | - | - | 1.908 | 57.733 | 17 | - | Professional, Scientific, and Technical Activities |
| - | - | - | - | 36.082 | 25.149 | 547 | - | Rental and Leasing Activities Without Option Rights, Employment, Travel agencies, and Other Business Supports |
| - | - | - | - | 10.969 | 3.705 | - | - | Government Administration, Land Business, and Mandatory Social Service |
| - | - | - | - | 20.263 | 8.982 | - | - | Education |
| 624 | - | - | - | 18.377 | 70.073 | - | - | Human Health Activities and Social Activities |
| - | - | - | - | 6.308 | 871 | - | - | Arts, Entertainment, and Recreation |
| 5.565 | - | - | - | 41.926 | - | 126 | - | Other Service Activities |
| - | - | - | - | - | - | - | - | Activities of Households as Employers; Activities that Produce Goods and Services by Households Used to Meet Their Own Needs |
| - | - | - | - | - | - | - | - | International Organizations and Other Extra International Organizations Activities |
| 125.761 | 133 | - | - | 2.372.526 | 15.175 | 29.287 | - | Household |
| - | - | - | - | 144.707 | 37.591 | - | 189.085 | Non-Business |
| - | - | - | - | - | - | - | 2.531.006 | Others |
| **140.149** | **133** | **264.331** | **-** | **4.403.268** | **13.214.903** | **42.634** | **2.720.091** | Total |

| No. | Sektor Ekonomi | 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, Equity and Other Capital Instruments |
|---|---|---|---|---|---|---|---|---|
| a | b | c | d | e | f | g | h | i |
| | **Posisi Periode Sebelumnya** | | | | | | | |
| 1 | Pertanian, Kehutanan dan Perikanan | - | - | - | - | - | - | - |
| 2 | Pertambangan dan Penggalian | - | - | - | - | - | - | - |
| 3 | Industri Pengolahan | - | - | - | - | - | - | - |
| 4 | Pengadaan Listrik, Gas, Uap/Air Panas dan Udara Dingin | - | - | - | - | - | - | - |
| 5 | Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah, dan Aktivitas Remediasi | - | - | - | - | - | - | - |
| 6 | Konstruksi | - | - | - | - | - | - | - |
| 7 | Perdagangan Besar dan Eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor | 2.005.238 | - | - | - | - | - | - |
| 8 | Pengangkutan dan Pergudangan | - | - | - | - | - | - | - |
| 9 | Penyediaan Akomodasi dan Penyediaan Makan Minum | - | - | - | - | - | - | - |
| 10 | Informasi dan Komunikasi | 1.159.769 | - | - | - | - | - | - |
| 11 | Aktivitas Keuangan dan Asuransi | 20.992.985 | 2.210.968 | - | 2.836.486 | - | 1.001.881 | - |
| 12 | Real Estat | - | - | - | - | - | - | - |
| 13 | Aktivitas Profesional, Ilmiah dan Teknis | - | - | - | - | - | - | - |
| 14 | Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Ketenagakerjaan, Agen Perjalanan dan Penunjang Usaha Lainnya | - | - | - | - | - | - | - |
| 15 | Administrasi Pemerintahan, Pertahanan dan Jaminan Sosial Wajib | - | - | - | - | - | - | - |
| 16 | Pendidikan | - | - | - | - | - | - | - |
| 17 | Aktivitas Kesehatan Manusia dan Aktivitas Sosial | - | - | - | - | - | - | - |
| 18 | Kesenian, Hiburan dan Rekreasi | - | - | - | - | - | - | - |
| 19 | Aktivitas Jasa Lainnya | - | - | - | - | - | - | - |
| 20 | Aktivitas Rumah Tangga sebagai Pemberi Kerja; Aktivitas yang Menghasilkan Barang dan Jasa oleh Rumah Tangga yang Digunakan untuk Memenuhi Kebutuhan Sendiri | - | - | - | - | - | - | - |
| 21 | Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya | - | - | - | - | - | - | - |
| 22 | Rumah Tangga | - | - | - | - | - | - | - |
| 23 | Bukan Lapangan Usaha Lainnya | - | - | - | - | - | - | - |
| 24 | Lainnya | - | - | - | - | - | - | - |
| | **Total** | **24.157.992** | **2.210.968** | **-** | **2.836.486** | **-** | **1.001.881** | **-** |

dalam jutaan Rupiah | in million Rupiah

| j | k | l | m | n | o | p | q | |
|---|---|---|---|---|---|---|---|---|
| **Kredit Beragun Properti Rumah Tinggal** Residential Property Collateralized Loans | **Kredit Beragun Properti Komersial** Commercial Property Collateralized Loans | **Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi** Land Acquisition, Land Processing and Construction Loans | **Kredit Pegawai atau Pensiunan** Employee or Retirement Loans | **Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel** Receivables from Micro, Small and Retail Portfolios | **Tagihan kepada Korporasi** Receivables from Corporations | **Tagihan yang Telah Jatuh Tempo** Due Receivables | **Aset Lainnya** Other Assets | Economic Sector |
| | | | | | | | | **Previous Period Position** |
| - | - | - | - | 361.910 | 446.601 | 1.097 | - | Agriculture, Forestry, and Fishery |
| - | - | - | - | 3.583 | 1.011.234 | - | - | Mining and Extractive Industries |
| - | - | - | - | 136.135 | 457.003 | 1.288 | - | Processing Industry |
| - | - | - | - | 3.206 | - | - | - | Procurement of Electricity, Gas, Steam/Hot Water, and Cold Air |
| - | - | - | - | 2.448 | 797 | 14 | - | Water Management, Wastewater Management, Waste Management and Recycling, and Remediation Activities |
| - | - | 95.754 | - | 50.462 | - | 260 | - | Construction |
| 330 | - | - | - | 948.494 | 5.387.608 | 11.610 | - | "Wholesale and Retail Trade, Car and Motorcycle Repair and Maintenance" |
| - | - | - | - | 19.437 | 115.747 | 226 | - | Transportation and Warehousing |
| - | - | - | - | 91.706 | 13.625 | 796 | - | Provision of Accommodation and Foods & Beverages |
| - | - | - | - | 3.029 | 697.073 | 208 | - | Information and Communication |
| - | - | - | - | 10.635 | 6.831.110 | - | - | Financial and Insurance Activities |
| - | - | - | - | 6.447 | 619.402 | - | - | Real Estate |
| - | - | - | - | 6.248 | 34.756 | 32 | - | Professional, Scientific, and Technical Activities |
| - | - | - | - | 70.126 | 25.154 | 359 | - | Rental and Leasing Activities Without Option Rights, Employment, Travel agencies, and Other Business Supports |
| - | - | - | - | - | - | - | - | Government Administration, Land Business, and Mandatory Social Service |
| - | - | - | - | 6.778 | 8.986 | 20 | - | Education |
| - | - | - | - | 5.837 | - | 7 | - | Human Health Activities and Social Activities |
| - | - | - | - | 3.431 | 1.030 | - | - | Arts, Entertainment, and Recreation |
| - | - | - | - | 10.917 | 8.443 | 677 | - | Other Service Activities |
| 4.103 | - | - | - | 2.546 | - | 11 | - | Activities of Households as Employers; Activities that Produce Goods and Services by Households Used to Meet Their Own Needs |
| - | - | - | - | - | - | - | - | International Organizations and Other Extra International Organizations Activities |
| 3.794 | 142 | - | - | 3.152.881 | 22.949 | 39.779 | - | Household |
| - | - | - | - | 115.723 | 38.556 | - | - | Non-Business |
| - | - | - | - | - | - | - | 3.001.980 | Others |
| **8.227** | **142** | **95.754** | **-** | **5.011.979** | **15.720.074** | **56.384** | **3.001.980** | Total |

## Bank Secara Individu
## Bank Individually

| No. | Sektor Ekonomi | 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, Equity and Other Capital Instruments |
|---|---|---|---|---|---|---|---|---|
| a | b | c | d | e | f | g | h | i |
| | **Posisi Tanggal Laporan** | | | | | | | |
| 1 | Pertanian, Kehutanan dan Perikanan | - | - | - | - | - | - | - |
| 2 | Pertambangan dan Penggalian | - | - | - | - | - | - | - |
| 3 | Industri Pengolahan | - | - | - | - | - | - | - |
| 4 | Pengadaan Listrik, Gas, Uap/Air Panas dan Udara Dingin | - | - | - | - | - | - | - |
| 5 | Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah, dan Aktivitas Remediasi | - | - | - | - | - | - | - |
| 6 | Konstruksi | - | - | - | - | - | - | - |
| 7 | Perdagangan Besar dan Eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor | - | - | - | - | - | - | - |
| 8 | Pengangkutan dan Pergudangan | - | - | - | - | - | - | - |
| 9 | Penyediaan Akomodasi dan Penyediaan Makan Minum | - | - | - | - | - | - | - |
| 10 | Informasi dan Komunikasi | 999.126 | - | - | - | - | - | - |
| 11 | Aktivitas Keuangan dan Asuransi | 19.895.939 | 2.009.545 | - | 4.667.186 | - | 929.696 | - |
| 12 | Real Estat | - | - | - | - | - | - | - |
| 13 | Aktivitas Profesional, Ilmiah dan Teknis | - | - | - | - | - | - | - |
| 14 | Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Ketenagakerjaan, Agen Perjalanan dan Penunjang Usaha Lainnya | - | - | - | - | - | - | - |
| 15 | Administrasi Pemerintahan, Pertahanan dan Jaminan Sosial Wajib | - | - | - | - | - | - | - |
| 16 | Pendidikan | - | - | - | - | - | - | - |
| 17 | Aktivitas Kesehatan Manusia dan Aktivitas Sosial | - | - | - | - | - | - | - |
| 18 | Kesenian, Hiburan dan Rekreasi | - | - | - | - | - | - | - |
| 19 | Aktivitas Jasa Lainnya | - | - | - | - | - | - | - |
| 20 | Aktivitas Rumah Tangga sebagai Pemberi Kerja; Aktivitas yang Menghasilkan Barang dan Jasa oleh Rumah Tangga yang Digunakan untuk Memenuhi Kebutuhan Sendiri | - | - | - | - | - | - | - |
| 21 | Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya | - | - | - | - | - | - | - |
| 22 | Rumah Tangga | - | - | - | - | - | - | - |
| 23 | Bukan Lapangan Usaha Lainnya | - | - | - | - | - | - | - |
| 24 | Lainnya | - | - | - | - | - | - | - |
| | **Total** | **20.895.065** | **2.009.545** | **-** | **4.667.186** | **-** | **929.696** | **-** |

dalam jutaan Rupiah | in million Rupiah

| Kredit Beragun Properti Rumah Tinggal Residential Property Collateralized Loans | Kredit Beragun Properti Komersial Commercial Property Collateralized Loans | Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi Land Acquisition, Land Processing and Construction Loans | Kredit Pegawai atau Pensiunan Employee or Retirement Loans | Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables from Micro, Small and Retail Portfolios | Tagihan kepada Korporasi Receivables from Corporations | Tagihan yang Telah Jatuh Tempo Due Receivables | Aset Lainnya Other Assets | Economic Sector |
|---|---|---|---|---|---|---|---|---|
| j | k | l | m | n | o | p | q | |
| | | | | | | | | Report Date Position |
| - | - | - | - | 355.935 | 31.259 | 1.537 | - | Agriculture, Forestry, and Fishery |
| - | - | - | - | 258 | 840.324 | - | - | Mining and Extractive Industries |
| 1.035 | - | - | - | 101.939 | 441.084 | 1.693 | - | Processing Industry |
| - | - | - | - | 4.561 | - | - | - | Procurement of Electricity, Gas, Steam/Hot Water, and Cold Air |
| - | - | - | - | 4.616 | 2.936 | - | - | Water Management, Wastewater Management, Waste Management and Recycling, and Remediation Activities |
| - | - | 264.331 | - | 62.598 | - | - | - | Construction |
| 6.460 | - | - | - | 734.377 | 3.844.963 | 8.711 | - | "Wholesale and Retail Trade, Car and Motorcycle Repair and Maintenance" |
| - | - | - | - | 17.738 | 162.112 | 285 | - | Transportation and Warehousing |
| 704 | - | - | - | 91.760 | 14.804 | 267 | - | Provision of Accommodation and Foods & Beverages |
| - | - | - | - | 2.466 | 100.030 | 56 | - | Information and Communication |
| - | - | - | - | 3.834 | 5.473.872 | 18 | - | Financial and Insurance Activities |
| - | - | - | - | 11.261 | 275.751 | - | - | Real Estate |
| - | - | - | - | 1.908 | 57.733 | 17 | - | Professional, Scientific, and Technical Activities |
| - | - | - | - | 36.082 | 25.149 | 547 | - | Rental and Leasing Activities Without Option Rights, Employment, Travel agencies, and Other Business Supports |
| - | - | - | - | - | - | - | - | Government Administration, Land Business, and Mandatory Social Service |
| - | - | - | - | 3.782 | 8.982 | - | - | Education |
| 624 | - | - | - | 6.595 | 70.073 | - | - | Human Health Activities and Social Activities |
| - | - | - | - | 6.308 | 871 | - | - | Arts, Entertainment, and Recreation |
| 654 | - | - | - | 38.079 | - | 126 | - | Other Service Activities |
| - | - | - | - | - | - | - | - | Activities of Households as Employers; Activities that Produce Goods and Services by Households Used to Meet Their Own Needs |
| - | - | - | - | - | - | - | - | International Organizations and Other Extra International Organizations Activities |
| 125.761 | 133 | - | - | 2.226.898 | 15.175 | 28.699 | - | Household |
| - | - | - | - | 144.707 | 37.591 | - | - | Non-Business |
| - | - | - | - | - | - | - | 2.531.006 | Others |
| **135.238** | **133** | **264.331** | **-** | **3.855.702** | **11.402.709** | **41.956** | **2.531.006** | Total |

| No. | Sektor Ekonomi | 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, Equity and Other Capital Instruments |
|---|---|---|---|---|---|---|---|---|
| a | b | c | d | e | f | g | h | i |
| | **Posisi Periode Sebelumnya** | | | | | | | |
| 1 | Pertanian, Kehutanan dan Perikanan | - | - | - | - | - | - | - |
| 2 | Pertambangan dan Penggalian | - | - | - | - | - | - | - |
| 3 | Industri Pengolahan | - | - | - | - | - | - | - |
| 4 | Pengadaan Listrik, Gas, Uap/Air Panas dan Udara Dingin | - | - | - | - | - | - | - |
| 5 | Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah, dan Aktivitas Remediasi | - | - | - | - | - | - | - |
| 6 | Konstruksi | - | - | - | - | - | - | - |
| 7 | Perdagangan Besar dan Eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor | - | - | - | - | - | - | - |
| 8 | Pengangkutan dan Pergudangan | - | - | - | - | - | - | - |
| 9 | Penyediaan Akomodasi dan Penyediaan Makan Minum | - | - | - | - | - | - | - |
| 10 | Informasi dan Komunikasi | 1.159.769 | - | - | - | - | - | - |
| 11 | Aktivitas Keuangan dan Asuransi | 20.639.800 | 2.210.968 | - | 2.836.486 | - | 1.001.881 | - |
| 12 | Real Estat | - | - | - | - | - | - | - |
| 13 | Aktivitas Profesional, Ilmiah dan Teknis | - | - | - | - | - | - | - |
| 14 | Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Ketenagakerjaan, Agen Perjalanan dan Penunjang Usaha Lainnya | - | - | - | - | - | - | - |
| 15 | Administrasi Pemerintahan, Pertahanan dan Jaminan Sosial Wajib | - | - | - | - | - | - | - |
| 16 | Pendidikan | - | - | - | - | - | - | - |
| 17 | Aktivitas Kesehatan Manusia dan Aktivitas Sosial | - | - | - | - | - | - | - |
| 18 | Kesenian, Hiburan dan Rekreasi | - | - | - | - | - | - | - |
| 19 | Aktivitas Jasa Lainnya | - | - | - | - | - | - | - |
| 20 | Aktivitas Rumah Tangga sebagai Pemberi Kerja; Aktivitas yang Menghasilkan Barang dan Jasa oleh Rumah Tangga yang Digunakan untuk Memenuhi Kebutuhan Sendiri | - | - | - | - | - | - | - |
| 21 | Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya | - | - | - | - | - | - | - |
| 22 | Rumah Tangga | - | - | - | - | - | - | - |
| 23 | Bukan Lapangan Usaha Lainnya | - | - | - | - | - | - | - |
| 24 | Lainnya | - | - | - | - | - | - | - |
| | **Total** | **21.799.569** | **2.210.968** | **-** | **2.836.486** | **-** | **1.001.881** | **-** |

dalam jutaan Rupiah | in million Rupiah

| **Kredit Beragun Properti Rumah Tinggal** Residential Property Collateralized Loans | **Kredit Beragun Properti Komersial** Commercial Property Collateralized Loans | **Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi** Land Acquisition, Land Processing and Construction Loans | **Kredit Pegawai atau Pensiunan** Employee or Retirement Loans | **Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel** Receivables from Micro, Small and Retail Portfolios | **Tagihan kepada Korporasi** Receivables from Corporations | **Tagihan yang Telah Jatuh Tempo** Due Receivables | **Aset Lainnya** Other Assets | Economic Sector |
|---|---|---|---|---|---|---|---|---|
| j | k | l | m | n | o | p | q | |
| | | | | | | | | **Previous Period Position** |
| - | - | - | - | 335.312 | 6.087 | 1.083 | - | Agriculture, Forestry, and Fishery |
| - | - | - | - | 3.583 | 1.011.234 | - | - | Mining and Extractive Industries |
| - | - | - | - | 119.877 | 457.003 | 1.288 | - | Processing Industry |
| - | - | - | - | 3.146 | - | - | - | Procurement of Electricity, Gas, Steam/Hot Water, and Cold Air |
| - | - | - | - | 2.448 | 797 | - | - | Water Management, Wastewater Management, Waste Management and Recycling, and Remediation Activities |
| - | - | 95.754 | - | 45.169 | - | 260 | - | Construction |
| 330 | - | - | - | 836.811 | 2.911.568 | 10.640 | - | "Wholesale and Retail Trade, Car and Motorcycle Repair and Maintenance" |
| - | - | - | - | 17.304 | 115.747 | 219 | - | Transportation and Warehousing |
| - | - | - | - | 80.474 | 13.625 | 776 | - | Provision of Accommodation and Foods & Beverages |
| - | - | - | - | 2.850 | 697.073 | 208 | - | Information and Communication |
| - | - | - | - | 10.635 | 6.820.165 | - | - | Financial and Insurance Activities |
| - | - | - | - | 6.294 | 505.864 | - | - | Real Estate |
| - | - | - | - | 5.477 | 34.756 | 32 | - | Professional, Scientific, and Technical Activities |
| - | - | - | - | 50.482 | 25.154 | 359 | - | Rental and Leasing Activities Without Option Rights, Employment, Travel agencies, and Other Business Supports |
| - | - | - | - | - | - | - | - | Government Administration, Land Business, and Mandatory Social Service |
| - | - | - | - | 3.958 | 8.986 | 20 | - | Education |
| - | - | - | - | 4.613 | - | - | - | Human Health Activities and Social Activities |
| - | - | - | - | 1.319 | 1.030 | - | - | Arts, Entertainment, and Recreation |
| - | - | - | - | 7.529 | 8.443 | 677 | - | Other Service Activities |
| - | - | - | - | - | - | - | - | Activities of Households as Employers; Activities that Produce Goods and Services by Households Used to Meet Their Own Needs |
| - | - | - | - | - | - | - | - | International Organizations and Other Extra International Organizations Activities |
| 3.794 | 142 | - | - | 2.977.200 | 22.949 | 36.300 | - | Household |
| - | - | - | - | 115.723 | 38.556 | - | - | Non-Business |
| - | - | - | - | - | - | - | 2.854.488 | Others |
| **4.124** | **142** | **95.754** | **-** | **4.630.204** | **12.679.037** | **51.862** | **2.854.488** | Total |

## Laporan Publikasi Eksposur Risiko dan Permodalan untuk ATMR Risiko Kredit - Pendekatan Standar

**Publication Report on Risk Exposure and Capital for Credit Risk RWA - Standardized Approach**

### Pengungkapan Tagihan Bersih Berdasarkan Sisa Jangka Waktu Kontrak

**Disclosure of Net Receivables by Remaining Contact Period**

Periode Laporan : Desember 2024
Report Period : December 2024

### Bank Secara Konsolidasi dengan Entitas Anak

**The Bank consolidated with Subsidiaries**

| No. | Kategori Portofolio | Posisi Tanggal Laporan Report Date | | | | | |
|---|---|---|---|---|---|---|---|
| | | Tagihan Bersih berdasarkan sisa jangka waktu kontrak Net Receivables by Remaining Contact Period | | | | | |
| | | ≤ 1 tahun ≤ 1 year | > 1 thn s.d. 3 thn >1 year to 3 years | > 3 thn s.d. 5 thn > 3 years to 5 years | > 5 thn >5 year | Non Kontraktual Non Contractual | Total |
| a | b | c | d | e | f | g | h |
| 1 | Tagihan kepada Pemerintah | 14.153.786 | 114.081 | 3.883.504 | 9.521.196 | - | **27.672.567** |
| 2 | Tagihan kepada Entitas Sektor Publik | - | - | - | 2.009.545 | - | **2.009.545** |
| 3 | Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional | - | - | - | - | - | **-** |
| 4 | Tagihan kepada Bank | 5.279.989 | 161.155 | 5.522 | 8.327 | - | **5.454.993** |
| 5 | Tagihan berupa Covered Bond | - | - | - | - | - | **-** |
| 6 | Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya | 661.762 | - | 121.738 | 146.196 | - | **929.696** |
| 7 | Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya | - | - | - | - | - | **-** |
| 8 | Kredit Beragun Properti Rumah Tinggal | - | 384 | 13.066 | 126.699 | - | **140.149** |
| 9 | Kredit Beragun Properti Komersial | - | - | - | 133 | - | **133** |
| 10 | Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi | 264.331 | - | - | - | - | **264.331** |
| 11 | Kredit Pegawai atau Pensiunan | - | - | - | - | - | **-** |
| 12 | Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel | 641.824 | 2.110.401 | 1.480.968 | 205.508 | - | **4.438.701** |
| 13 | Tagihan kepada Korporasi | 5.348.372 | 950.606 | 1.065.284 | 5.947.519 | - | **13.311.781** |
| 14 | Tagihan yang Telah Jatuh Tempo | 8.544 | 25.520 | 6.975 | 1.595 | - | **42.634** |
| 15 | Aset Lainnya | - | - | - | - | 2.720.091 | **2.720.091** |
| | **Total** | **26.358.608** | **3.362.147** | **6.577.057** | **17.966.718** | **2.720.091** | **56.984.621** |

dalam jutaan Rupiah | in million Rupiah

| Posisi Tanggal Laporan Tahun Sebelumnya<br>Previous Year Report Date Position | | | | | | Portfolio Category |
|---|---|---|---|---|---|---|
| Tagihan Bersih berdasarkan sisa jangka waktu kontrak<br>Net Receivables by Remaining Contact Period | | | | | | |
| **≤ 1 tahun**<br>≤ 1 year | **> 1 thn s.d. 3 thn**<br>>1 year to 3 years | **> 3 thn s.d. 5 thn**<br>> 3 years to 5 years | **> 5 thn**<br>>5 year | **Non Kontraktual**<br>Non Contractual | **Total** | |
| **i** | **j** | **k** | **l** | **m** | **n** | |
| 14.821.888 | 810.002 | - | 8.526.101 | - | **24.157.991** | Receivables from Government |
| - | - | 48.839 | 2.162.129 | - | **2.210.968** | Receivables from Public Sector Entities |
| - | - | - | - | - | **-** | Receivables from Multilateral Development Banks and International Institutions |
| 2.807.808 | 23.311 | 5.367 | - | - | **2.836.486** | Receivables from Banks |
| - | - | - | - | - | **-** | Receivables from Covered Bond |
| 700.897 | 94 | - | 300.890 | - | **1.001.881** | Receivables from Securities Companies and Other Financial Services Institutions |
| - | - | - | - | - | **-** | Receivables in the form of Subordinated Securities, Equity and Other Capital Instruments |
| 1.755 | - | 877 | 5.596 | - | **8.228** | Residential Property Collateralized Loans |
| - | - | - | 142 | - | **142** | Commercial Property Collateralized Loans |
| 94.541 | 1.213 | - | - | - | **95.754** | Land Acquisition, Land Processing and Construction Loans |
| - | - | - | - | - | **-** | Employee or Retairement Loans |
| 488.163 | 2.956.556 | 1.393.135 | 174.125 | - | **5.011.979** | Receivables from Microbusiness,Small Business, and Retail Portfolio |
| 3.921.056 | 2.699.422 | 304.371 | 8.795.225 | - | **15.720.074** | Receivables from Corporations |
| 9.149 | 32.546 | 13.185 | 1.504 | - | **56.384** | Due Receivables |
| - | - | - | - | 3.001.980 | **3.001.980** | Other Assets |
| **22.845.257** | **6.523.144** | **1.765.774** | **19.965.712** | **3.001.980** | **54.101.866** | |

## Bank Secara Individu
**Bank Individually**

| No. | Kategori Portofolio | Posisi Tanggal Laporan Report Date | | | | | |
|---|---|---|---|---|---|---|---|
| | | Tagihan Bersih berdasarkan sisa jangka waktu kontrak Net Receivables by Remaining Contact Period | | | | | |
| | | **≤ 1 tahun** ≤ 1 year | **> 1 thn s.d. 3 thn** >1 year to 3 years | **> 3 thn s.d. 5 thn** > 3 years to 5 years | **> 5 thn** >5 year | **Non Kontraktual** Non Contractual | **Total** |
| **a** | **b** | **c** | **d** | **e** | **f** | **g** | **h** |
| 1 | Tagihan kepada Pemerintah | 11.339.680 | 10.289 | 23.900 | 9.521.196 | - | **20.895.065** |
| 2 | Tagihan kepada Entitas Sektor Publik | - | - | - | 2.009.545 | - | **2.009.545** |
| 3 | Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional | - | - | - | - | - | **-** |
| 4 | Tagihan kepada Bank | 4.492.182 | 161.155 | 5.522 | 8.327 | - | **4.667.186** |
| 5 | Tagihan berupa Covered Bond | - | - | - | - | - | **-** |
| 6 | Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya | 661.762 | - | 121.738 | 146.196 | - | **929.696** |
| 7 | Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya | - | - | - | - | - | **-** |
| 8 | Kredit Beragun Properti Rumah Tinggal | - | 384 | 8.155 | 126.699 | - | **135.238** |
| 9 | Kredit Beragun Properti Komersial | - | - | - | 133 | - | **133** |
| 10 | Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi | 264.331 | - | - | - | - | **264.331** |
| 11 | Kredit Pegawai atau Pensiunan | - | - | - | - | - | **-** |
| 12 | Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel | 615.609 | 1.929.462 | 1.105.248 | 205.383 | - | **3.855.702** |
| 13 | Tagihan kepada Korporasi | 4.163.765 | 901.458 | 389.967 | 5.947.519 | - | **11.402.709** |
| 14 | Tagihan yang Telah Jatuh Tempo | 8.505 | 25.059 | 6.797 | 1.595 | - | **41.956** |
| 15 | Aset Lainnya | - | - | - | - | 2.531.006 | **2.531.006** |
| | **Total** | **21.545.834** | **3.027.807** | **1.661.327** | **17.966.593** | **2.531.006** | **46.732.567** |

dalam jutaan Rupiah | in million Rupiah

| Posisi Tanggal Laporan Tahun Sebelumnya<br>Previous Year Report Date Position | | | | | | Portfolio Category |
|---|---|---|---|---|---|---|
| Tagihan Bersih berdasarkan sisa jangka waktu kontrak<br>Net Receivables by Remaining Contact Period | | | | | | |
| **≤ 1 tahun**<br>≤ 1 year | **> 1 thn s.d. 3 thn**<br>>1 year to 3 years | **> 3 thn s.d. 5 thn**<br>> 3 years to 5 years | **> 5 thn**<br>>5 year | **Non Kontraktual**<br>Non Contractual | **Total** | |
| **i** | **j** | **k** | **l** | **m** | **n** | |
| 13.318.713 | 307.940 | - | 8.172.916 | - | **21.799.569** | Receivables from Government |
| - | - | 48.839 | 2.162.129 | - | **2.210.968** | Receivables from Public Sector Entities |
| - | - | - | - | - | **-** | Receivables from Multilateral Development Banks and International Institutions |
| 2.807.808 | 23.311 | 5.367 | - | - | **2.836.486** | Receivables from Banks |
| - | - | - | - | - | **-** | Receivables from Covered Bond |
| 700.897 | 94 | - | 300.890 | - | **1.001.881** | Receivables from Securities Companies and Other Financial Services Institutions |
| - | - | - | - | - | **-** | Receivables in the form of Subordinated Securities, Equity and Other Capital Instruments |
| - | - | 877 | 3.247 | - | **4.124** | Residential Property Collateralized Loans |
| - | - | - | 142 | - | **142** | Commercial Property Collateralized Loans |
| 94.541 | 1.213 | - | - | - | **95.754** | Land Acquisition, Land Processing and Construction Loans |
| - | - | - | - | - | **-** | Employee or Retairement Loans |
| 477.076 | 2.832.937 | 1.159.932 | 160.259 | - | **4.630.204** | Receivables from Microbusiness,Small Business, and Retail Portfolio |
| 2.639.151 | 1.854.208 | 153.272 | 8.032.406 | - | **12.679.037** | Receivables from Corporations |
| 8.352 | 30.972 | 11.034 | 1.504 | - | **51.862** | Due Receivables |
| - | - | - | - | 2.854.488 | **2.854.488** | Other Assets |
| **20.046.538** | **5.050.675** | **1.379.321** | **18.833.493** | **2.854.488** | **48.164.514** | |

## Laporan Publikasi Eksposur Risiko dan Permodalan untuk ATMR Risiko Kredit - Pendekatan Standar

**Publication Report on Risk Exposure and Capital for Credit Risk RWA - Standardized Approach**

### Pengungkapan Tagihan dan Pencadangan Berdasarkan Sektor Ekonomi

**Disclosure of Receivables and Allowances by Economic Sector**

Periode Laporan : Desember 2024
Report Period : December 2024

### Bank Secara Konsolidasi dengan Entitas Anak

**The Bank consolidated with Subsidiaries**

| No. | Sektor Ekonomi | Tagihan Receivables | Tagihan yang Mengalami Penurunan Nilai Impaired Receivables | |
|---|---|---|---|---|
| | | | Belum Jatuh Tempo Not yet matured | Telah Jatuh Tempo Matured |
| a | b | c | d | e |
| | **Posisi Tanggal Laporan** | | | |
| 1 | Pertanian, Kehutanan dan Perikanan | 405.360 | - | 3.199 |
| 2 | Pertambangan dan Penggalian | 850.874 | - | - |
| 3 | Industri Pengolahan | 699.038 | - | 3.786 |
| 4 | Pengadaan Listrik, Gas, Uap/Air Panas dan Udara Dingin | 4.732 | - | - |
| 5 | Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah, dan Aktivitas Remediasi | 9.814 | - | - |
| 6 | Konstruksi | 650.562 | - | - |
| 7 | Perdagangan Besar dan Eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor | 5.896.350 | - | 16.965 |
| 8 | Pengangkutan dan Pergudangan | 445.172 | - | 556 |
| 9 | Penyediaan Akomodasi dan Penyediaan Makan Minum | 110.244 | - | 520 |
| 10 | Informasi dan Komunikasi | 2.002.003 | - | 110 |
| 11 | Aktivitas Keuangan dan Asuransi | 33.635.282 | - | 60 |
| 12 | Real Estate | 288.913 | - | - |
| 13 | Aktivitas Profesional, Ilmiah dan Teknis | 77.629 | - | 32 |
| 14 | Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Ketenagakerjaan, Agen Perjalanan dan Penunjang Usaha Lainnya | 72.692 | - | 1.066 |
| 15 | Administrasi Pemerintahan, Pertahanan dan Jaminan Sosial Wajib | - | - | - |
| 16 | Pendidikan | 12.786 | - | - |
| 17 | Aktivitas Kesehatan Manusia dan Aktivitas Sosial | 79.206 | - | - |
| 18 | Kesenian, Hiburan dan Rekreasi | 8.664 | - | - |
| 19 | Aktivitas Jasa Lainnya | 40.182 | - | 245 |
| 20 | Aktivitas Rumah Tangga sebagai Pemberi Kerja; Aktivitas yang Menghasilkan Barang dan Jasa oleh Rumah Tangga yang Digunakan untuk Memenuhi Kebutuhan Sendiri | - | - | - |
| 21 | Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya | - | - | - |
| 22 | Rumah Tangga | 2.449.796 | - | 53.640 |
| 23 | Bukan Lapangan Usaha Lainnya | 389.064 | - | - |
| 24 | Lainnya | 2.531.443 | - | - |
| | **Total** | **50.659.807** | **-** | **80.179** |

dalam jutaan Rupiah | in million Rupiah

| CKPN Stage 1 Allowance for Impairment Losses Stage 1 | CKPN Stage 2 Allowance for Impairment Losses Stage 2 | CKPN Stage 3 Allowance for Impairment Losses Stage 3 | Tagihan yang Dihapus Buku Amounts written-off | Economic Sector |
|---|---|---|---|---|
| f | g | h | i | |
| | | | | Report Date Position |
| - | 1.079 | 1.662 | - | Agriculture, Forestry, and Fishery |
| - | - | - | - | Mining and Extractive Industries |
| - | 939 | 2.094 | - | Processing Industry |
| - | - | - | - | Procurement of Electricity, Gas, Steam/Hot Water, and Cold Air |
| - | 195 | - | - | Water Management, Wastewater Management, Waste Management and Recycling, and Remediation Activities |
| - | 221 | - | - | Construction |
| - | 276.433 | 137.882 | - | Wholesale and Retail Trade, Car and Motorcycle Repair and Maintenance |
| - | 102 | 270 | - | Transportation and Warehousing |
| - | 859 | 253 | - | Provision of Accommodation and Foods & Beverages |
| - | - | 53 | - | Information and Communication |
| - | - | 42 | - | Financial and Insurance Activities |
| - | 86 | - | - | Real Estate |
| - | - | 16 | - | Professional, Scientific, and Technical Activities |
| - | 495 | 519 | - | Rental and Leasing Activities Without Option Rights, Employment, Travel agencies, and Other Business Supports |
| - | - | - | - | Government Administration, Land Business, and Mandatory Social Service |
| - | - | - | - | Education |
| - | 364 | - | - | Human Health Activities and Social Activities |
| - | 7 | - | - | Arts, Entertainment, and Recreation |
| - | 1.203 | 119 | - | Other Service Activities |
| - | - | - | - | Activities of Households as Employers; Activities that Produce Goods and Services by Households Used to Meet Their Own Needs |
| - | - | - | - | International Organizations and Other Extra International Organizations Activities |
| - | 28.071 | 25.060 | - | Household |
| - | 12 | 57 | - | Non-Business |
| - | - | - | - | Others |
| **-** | **310.066** | **168.027** | **-** | **Total** |

| No. | Sektor Ekonomi | Tagihan<br>Receivables | Tagihan yang Mengalami Penurunan Nilai<br>Impaired Receivables | |
|---|---|---|---|---|
| | | | Belum Jatuh Tempo<br>Not yet matured | Telah Jatuh Tempo<br>Matured |
| a | b | c | d | e |
| | **Posisi Periode Sebelumnya** | | | |
| 1 | Pertanian, Kehutanan dan Perikanan | 813.800 | 6.096 | 3.049 |
| 2 | Pertambangan dan Penggalian | 1.014.904 | 147 | - |
| 3 | Industri Pengolahan | 685.963 | 78.231 | 3.212 |
| 4 | Pengadaan Listrik, Gas, Uap/Air Panas dan Udara Dingin | 3.359 | - | - |
| 5 | Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah, dan Aktivitas Remediasi | 7.467 | - | - |
| 6 | Konstruksi | 374.749 | 1.887 | 485 |
| 7 | Perdagangan Besar dan Eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor | 9.810.355 | 462.453 | 18.928 |
| 8 | Pengangkutan dan Pergudangan | 427.844 | 264 | 389 |
| 9 | Penyediaan Akomodasi dan Penyediaan Makan Minum | 113.277 | 14.066 | 1.375 |
| 10 | Informasi dan Komunikasi | 1.873.999 | 1.986 | 369 |
| 11 | Aktivitas Keuangan dan Asuransi | 34.539.307 | - | - |
| 12 | Real Estate | 628.593 | 279 | - |
| 13 | Aktivitas Profesional, Ilmiah dan Teknis | 82.411 | - | 57 |
| 14 | Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Ketenagakerjaan, Agen Perjalanan dan Penunjang Usaha Lainnya | 163.593 | 1.817 | 636 |
| 15 | Administrasi Pemerintahan, Pertahanan dan Jaminan Sosial Wajib | - | - | - |
| 16 | Pendidikan | 15.817 | - | 36 |
| 17 | Aktivitas Kesehatan Manusia dan Aktivitas Sosial | 153.842 | 98 | - |
| 18 | Kesenian, Hiburan dan Rekreasi | 4.462 | - | - |
| 19 | Aktivitas Jasa Lainnya | 25.319 | 524 | 1.200 |
| 20 | Aktivitas Rumah Tangga sebagai Pemberi Kerja; Aktivitas yang Menghasilkan Barang dan Jasa oleh Rumah Tangga yang Digunakan untuk Memenuhi Kebutuhan Sendiri | 6.660 | - | - |
| 21 | Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya | - | - | - |
| 22 | Rumah Tangga | 3.314.778 | 933.209 | 71.986 |
| 23 | Bukan Lapangan Usaha Lainnya | 318.421 | 416 | - |
| 24 | Lainnya | 3.036.586 | - | - |
| | **Total** | **57.415.506** | **1.501.473** | **101.721** |

dalam jutaan Rupiah | in million Rupiah

| CKPN Stage 1 Allowance for Impairment Losses Stage 1 | CKPN Stage 2 Allowance for Impairment Losses Stage 2 | CKPN Stage 3 Allowance for Impairment Losses Stage 3 | Tagihan yang Dihapus Buku Amounts written-off | Economic Sector |
|---|---|---|---|---|
| f | g | h | i | |
| | | | | Previous Period Position |
| 13 | 1.356 | 1.967 | 12.760 | Agriculture, Forestry, and Fishery |
| - | 25 | - | 56.449 | Mining and Extractive Industries |
| - | 1.589 | 2.527 | 23.068 | Processing Industry |
| - | - | - | - | Procurement of Electricity, Gas, Steam/Hot Water, and Cold Air |
| - | 5 | - | - | Water Management, Wastewater Management, Waste Management and Recycling, and Remediation Activities |
| - | 412 | 335 | 56.570 | Construction |
| 331.233 | 275.364 | 9.328 | 2.904.661 | Wholesale and Retail Trade, Car and Motorcycle Repair and Maintenance |
| - | 322 | 169 | 2.264 | Transportation and Warehousing |
| 8 | 525 | 1.816 | 99.884 | Provision of Accommodation and Foods & Beverages |
| - | 7.790 | 1.026 | 2.721 | Information and Communication |
| - | - | 72 | 241.994 | Financial and Insurance Activities |
| - | 59 | - | 667.103 | Real Estate |
| - | - | 25 | 1.960 | Professional, Scientific, and Technical Activities |
| - | 161 | 277 | 707.365 | Rental and Leasing Activities Without Option Rights, Employment, Travel agencies, and Other Business Supports |
| - | - | - | - | Government Administration, Land Business, and Mandatory Social Service |
| 2 | - | 16 | - | Education |
| 1 | 28 | 147.969 | 517 | Human Health Activities and Social Activities |
| - | - | - | 285.194 | Arts, Entertainment, and Recreation |
| - | 160 | 523 | 582 | Other Service Activities |
| - | - | - | 10.273 | Activities of Households as Employers; Activities that Produce Goods and Services by Households Used to Meet Their Own Needs |
| - | - | - | - | International Organizations and Other Extra International Organizations Activities |
| 291 | 59.381 | 35.847 | 346.144 | Household |
| - | 187 | 25 | 434.610 | Non-Business |
| - | - | - | - | Others |
| **331.548** | **347.365** | **201.920** | **5.854.119** | **Total** |

## Bank Secara Individu
**Bank Individually**

| No. | Sektor Ekonomi | Tagihan Receivables | Tagihan yang Mengalami Penurunan Nilai Impaired Receivables | |
|---|---|---|---|---|
| | | | Belum Jatuh Tempo Not yet matured | Telah Jatuh Tempo Matured |
| a | b | c | d | e |
| | **Posisi Tanggal Laporan** | | | |
| 1 | Pertanian, Kehutanan dan Perikanan | 405.360 | - | 3.199 |
| 2 | Pertambangan dan Penggalian | 850.874 | - | - |
| 3 | Industri Pengolahan | 699.038 | - | 3.786 |
| 4 | Pengadaan Listrik, Gas, Uap/Air Panas dan Udara Dingin | 4.732 | - | - |
| 5 | Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah, dan Aktivitas Remediasi | 9.814 | - | - |
| 6 | Konstruksi | 650.562 | - | - |
| 7 | Perdagangan Besar dan Eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor | 5.896.350 | - | 16.965 |
| 8 | Pengangkutan dan Pergudangan | 445.172 | - | 556 |
| 9 | Penyediaan Akomodasi dan Penyediaan Makan Minum | 110.244 | - | 520 |
| 10 | Informasi dan Komunikasi | 2.002.003 | - | 110 |
| 11 | Aktivitas Keuangan dan Asuransi | 33.635.282 | - | 60 |
| 12 | Real Estate | 288.913 | - | - |
| 13 | Aktivitas Profesional, Ilmiah dan Teknis | 77.629 | - | 32 |
| 14 | Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Ketenagakerjaan, Agen Perjalanan dan Penunjang Usaha Lainnya | 72.692 | - | 1.066 |
| 15 | Administrasi Pemerintahan, Pertahanan dan Jaminan Sosial Wajib | - | - | - |
| 16 | Pendidikan | 12.786 | - | - |
| 17 | Aktivitas Kesehatan Manusia dan Aktivitas Sosial | 79.206 | - | - |
| 18 | Kesenian, Hiburan dan Rekreasi | 8.664 | - | - |
| 19 | Aktivitas Jasa Lainnya | 40.182 | - | 245 |
| 20 | Aktivitas Rumah Tangga sebagai Pemberi Kerja; Aktivitas yang Menghasilkan Barang dan Jasa oleh Rumah Tangga yang Digunakan untuk Memenuhi Kebutuhan Sendiri | - | - | - |
| 21 | Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya | - | - | - |
| 22 | Rumah Tangga | 2.449.796 | - | 53.640 |
| 23 | Bukan Lapangan Usaha Lainnya | 389.064 | - | - |
| 24 | Lainnya | 2.531.443 | - | - |
| | **Total** | **50.659.807** | **-** | **80.179** |

dalam jutaan Rupiah | in million Rupiah

| CKPN Stage 1 Allowance for Impairment Losses Stage 1 | CKPN Stage 2 Allowance for Impairment Losses Stage 2 | CKPN Stage 3 Allowance for Impairment Losses Stage 3 | Tagihan yang Dihapus Buku Amounts written-off | Economic Sector |
|---|---|---|---|---|
| f | g | h | i | |
| | | | | Report Date Position |
| - | 1.079 | 1.662 | - | Agriculture, Forestry, and Fishery |
| - | - | - | - | Mining and Extractive Industries |
| - | 939 | 2.094 | - | Processing Industry |
| - | - | - | - | Procurement of Electricity, Gas, Steam/Hot Water, and Cold Air |
| - | 195 | - | - | Water Management, Wastewater Management, Waste Management and Recycling, and Remediation Activities |
| - | 221 | - | - | Construction |
| - | 276.433 | 137.882 | - | Wholesale and Retail Trade, Car and Motorcycle Repair and Maintenance |
| - | 102 | 270 | - | Transportation and Warehousing |
| - | 859 | 253 | - | Provision of Accommodation and Foods & Beverages |
| - | - | 53 | - | Information and Communication |
| - | - | 42 | - | Financial and Insurance Activities |
| - | 86 | - | - | Real Estate |
| - | - | 16 | - | Professional, Scientific, and Technical Activities |
| - | 495 | 519 | - | Rental and Leasing Activities Without Option Rights, Employment, Travel agencies, and Other Business Supports |
| - | - | - | - | Government Administration, Land Business, and Mandatory Social Service |
| - | - | - | - | Education |
| - | 364 | - | - | Human Health Activities and Social Activities |
| - | 7 | - | - | Arts, Entertainment, and Recreation |
| - | 1.203 | 119 | - | Other Service Activities |
| - | - | - | - | Activities of Households as Employers; Activities that Produce Goods and Services by Households Used to Meet Their Own Needs |
| - | - | - | - | International Organizations and Other Extra International Organizations Activities |
| - | 28.071 | 25.060 | - | Household |
| - | 12 | 57 | - | Non-Business |
| - | - | - | - | Others |
| **-** | **310.066** | **168.027** | **-** | **Total** |

| No. | Sektor Ekonomi | Tagihan<br>Receivables | Tagihan yang Mengalami Penurunan Nilai<br>Impaired Receivables | |
|---|---|---|---|---|
| | | | Belum Jatuh Tempo<br>Not yet matured | Telah Jatuh Tempo<br>Matured |
| a | b | c | d | e |
| | **Posisi Periode Sebelumnya** | | | |
| 1 | Pertanian, Kehutanan dan Perikanan | 346.675 | 6.096 | 3.049 |
| 2 | Pertambangan dan Penggalian | 1.014.904 | 147 | - |
| 3 | Industri Pengolahan | 669.705 | 78.231 | 3.212 |
| 4 | Pengadaan Listrik, Gas, Uap/Air Panas dan Udara Dingin | 3.299 | - | - |
| 5 | Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah, dan Aktivitas Remediasi | 7.453 | - | - |
| 6 | Konstruksi | 369.457 | 1.887 | 485 |
| 7 | Perdagangan Besar dan Eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor | 5.216.425 | 462.453 | 18.928 |
| 8 | Pengangkutan dan Pergudangan | 425.704 | 264 | 389 |
| 9 | Penyediaan Akomodasi dan Penyediaan Makan Minum | 102.025 | 14.066 | 1.375 |
| 10 | Informasi dan Komunikasi | 1.873.820 | 1.986 | 369 |
| 11 | Aktivitas Keuangan dan Asuransi | 34.175.175 | - | - |
| 12 | Real Estate | 514.905 | 279 | - |
| 13 | Aktivitas Profesional, Ilmiah dan Teknis | 81.640 | - | 57 |
| 14 | Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Ketenagakerjaan, Agen Perjalanan dan Penunjang Usaha Lainnya | 143.949 | 1.817 | 636 |
| 15 | Administrasi Pemerintahan, Pertahanan dan Jaminan Sosial Wajib | - | - | - |
| 16 | Pendidikan | 12.997 | - | 36 |
| 17 | Aktivitas Kesehatan Manusia dan Aktivitas Sosial | 4.641 | 98 | - |
| 18 | Kesenian, Hiburan dan Rekreasi | 2.349 | - | - |
| 19 | Aktivitas Jasa Lainnya | 21.931 | 524 | 1.200 |
| 20 | Aktivitas Rumah Tangga sebagai Pemberi Kerja; Aktivitas yang Menghasilkan Barang dan Jasa oleh Rumah Tangga yang Digunakan untuk Memenuhi Kebutuhan Sendiri | - | - | - |
| 21 | Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya | - | - | - |
| 22 | Rumah Tangga | 3.135.617 | 933.209 | 71.986 |
| 23 | Bukan Lapangan Usaha Lainnya | 318.421 | 416 | - |
| 24 | Lainnya | 2.889.094 | - | - |
| | **Total** | **51.330.186** | **1.501.473** | **101.721** |

dalam jutaan Rupiah | in million Rupiah

| CKPN Stage 1 Allowance for Impairment Losses Stage 1 | CKPN Stage 2 Allowance for Impairment Losses Stage 2 | CKPN Stage 3 Allowance for Impairment Losses Stage 3 | Tagihan yang Dihapus Buku Amounts written-off | Economic Sector |
|---|---|---|---|---|
| f | g | h | i | |
| | | | | Previous Period Position |
| - | 1.356 | 1.967 | 12.306 | Agriculture, Forestry, and Fishery |
| - | 25 | - | 18.368 | Mining and Extractive Industries |
| - | 1.589 | 2.527 | 23.068 | Processing Industry |
| - | - | - | - | Procurement of Electricity, Gas, Steam/Hot Water, and Cold Air |
| - | 5 | - | - | Water Management, Wastewater Management, Waste Management and Recycling, and Remediation Activities |
| - | 412 | 335 | 49.867 | Construction |
| - | 275.364 | 9.328 | 2.795.112 | Wholesale and Retail Trade, Car and Motorcycle Repair and Maintenance |
| - | 322 | 169 | 2.256 | Transportation and Warehousing |
| - | 525 | 1.816 | 60.726 | Provision of Accommodation and Foods & Beverages |
| - | 7.790 | 1.026 | 166 | Information and Communication |
| - | - | 72 | 168.092 | Financial and Insurance Activities |
| - | 59 | - | 655.529 | Real Estate |
| - | - | 25 | 1.960 | Professional, Scientific, and Technical Activities |
| - | 161 | 277 | 700.272 | Rental and Leasing Activities Without Option Rights, Employment, Travel agencies, and Other Business Supports |
| - | - | - | - | Government Administration, Land Business, and Mandatory Social Service |
| - | - | 16 | - | Education |
| - | 28 | - | 148 | Human Health Activities and Social Activities |
| - | - | - | 285.194 | Arts, Entertainment, and Recreation |
| - | 160 | 523 | 463 | Other Service Activities |
| - | - | - | 10.273 | Activities of Households as Employers; Activities that Produce Goods and Services by Households Used to Meet Their Own Needs |
| - | - | - | - | International Organizations and Other Extra International Organizations Activities |
| - | 59.381 | 35.847 | 346.144 | Household |
| - | 187 | 25 | 415.815 | Non-Business |
| - | - | - | - | Others |
| **-** | **347.365** | **53.951** | **5.545.759** | **Total** |

# Laporan Publikasi Eksposur Risiko dan Permodalan untuk ATMR Risiko Kredit - Pendekatan Standar

## Publication Report on Risk Exposure and Capital for Credit Risk RWA - Standardized Approach

### Pengungkapan Tagihan Berdasarkan Hari Tunggakan

Disclosure of Receivables by Due Date

Periode Laporan : Desember 2024
Report Period : December 2024

### Bank Secara Konsolidasi dengan Entitas Anak

The Bank consolidated with Subsidiaries

dalam jutaan Rupiah | in million Rupiah

| No. | Jenis Eksposur<br>Exposure Type | Posisi Tanggal Laporan<br>Report Date | | | | Posisi Tanggal Laporan Tahun Sebelumnya<br>Previous Year Report Date Position | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | Tagihan Berdasarkan Hari Tunggakan<br>Receivables by Due Date | | | | Tagihan Berdasarkan Hari Tunggakan<br>Receivables by Due Date | | | |
| | | > 90 hari s.d. 120 hari<br>> 90 days to 120 days | > 120 hari s.d. 180 hari<br>> 120 days to 180 days | > 180 hari<br>> 180 days | Total | > 90 hari s.d. 120 hari<br>> 90 days to 120 days | > 120 hari s.d. 180 hari<br>> 120 days to 180 days | > 180 hari<br>> 180 days | Total |
| a | b | c | d | e | f | g | h | i | j |
| 1 | Kredit yang termasuk dalam Tagihan yang Telah Jatuh Tempo<br>Loan included in Due Receivables | 25.960 | 22.440 | 38.675 | **87.075** | 52.908 | 20.716 | 32.620 | 106.244 |
| 2 | Surat Berharga yang termasuk dalam Tagihan yang Telah Jatuh Tempo<br>Securities Included in Due Receivables | - | - | - | - | - | - | - | - |
| | **Total** | **25.960** | **22.440** | **38.675** | **87.075** | **52.908** | **20.716** | **32.620** | **106.244** |

### Bank Secara Individu

Bank Individually

dalam jutaan Rupiah | in million Rupiah

| No. | Jenis Eksposur<br>Exposure Type | Posisi Tanggal Laporan<br>Report Date | | | | Posisi Tanggal Laporan Tahun Sebelumnya<br>Previous Year Report Date Position | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | Tagihan Berdasarkan Hari Tunggakan<br>Receivables by Due Date | | | | Tagihan Berdasarkan Hari Tunggakan<br>Receivables by Due Date | | | |
| | | > 90 hari s.d. 120 hari<br>> 90 days to 120 days | > 120 hari s.d. 180 hari<br>> 120 days to 180 days | > 180 hari<br>> 180 days | Total | > 90 hari s.d. 120 hari<br>> 90 days to 120 days | > 120 hari s.d. 180 hari<br>> 120 days to 180 days | > 180 hari<br>> 180 days | Total |
| a | b | c | d | e | f | g | h | i | j |
| 1 | Kredit yang termasuk dalam Tagihan yang Telah Jatuh Tempo<br>Loan included in Due Receivables | 23.071 | 20.604 | 36.504 | **80.179** | 50.136 | 20.017 | 31.569 | 101.722 |
| 2 | Surat Berharga yang termasuk dalam Tagihan yang Telah Jatuh Tempo<br>Securities Included in Due Receivables | - | - | - | - | - | - | - | - |
| | **Total** | **23.071** | **20.604** | **36.504** | **80.179** | **50.136** | **20.017** | **31.569** | **101.722** |

## Laporan Publikasi Eksposur Risiko dan Permodalan untuk ATMR Risiko Kredit - Pendekatan Standar

**Publication Report on Risk Exposure and Capital for Credit Risk RWA - Standardized Approach**

### Pengungkapan Tambahan terkait Perlakuan terhadap Aset Bermasalah (CRB-A)

**Additional Disclosures regarding Treatment of Non-Performing Assets (CRB-A)**

Periode Laporan : Desember 2024
Report Period : December 2024

### Bank Secara Konsolidasi dengan Entitas Anak

**The Bank consolidated with Subsidiaries**

| Analisa Kualitatif | Qualitative Analysis |
|---|---|
| Aset Non-performing adalah aset produktif sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan No.40/POJK.03/2019 tentang Penilaian Kualitas Aset Bank Umum, dan memiliki kualitas aset Kurang Lancar, Diragukan, dan Macet. Kredit korporasi adalah tagihan kepada korporasi berupa pinjaman atau surat utang kepada korporasi termasuk tagihan kepada perusahaan asuransi sesuai dengan Ketentuan SEOJK No.24/SEOJK.03/2021, sedangkan untuk kredit ritel adalah tagihan selain kepada korporasi. | Non-performing Assets are productive assets as regulated in the Financial Services Authority Regulation No. 40/POJK.03/2019 concerning the Assessment of the Quality of Commercial Bank Assets, and are classified as having Poor, Doubtful, and Loss asset quality. Corporate credit refers to receivables from corporations in the form of loans or debt securities to corporations, including receivables from insurance companies in accordance with SEOJK Regulation No. 24/SEOJK.03/2021, while retail credit refers to receivables other than those from corporations. |
| Restrukturisasi Kredit/Pembiayaan adalah upaya perbaikan yang dilakukan oleh Bank kepada Debitur/Nasabah yang mengalami kesulitan untuk memenuhi kewajibannya (pembayaran pokok dan/atau bunga/ margin/bagi hasil/ujrah) sepanjang Debitur/Nasabah yang bersangkutan masih memiliki prospek usaha yang baik dan dinilai mampu memenuhi kewajiban setelah Kredit/Pembiayaan direstrukturisasi. Selain itu terdapat Restrukturisasi Covid-19, yakni penanganan khusus kepada debitur/ nasabah yang mengalami kesulitan untuk memenuhi kewajiban pada Bank karena usahanya terkena dampak dari penyebaran COVID-19 baik secara langsung ataupun tidak langsung namun masih memiliki prospek usaha sehingga masih memiliki kemampuan membayar kewajiban. | Credit/Financing Restructuring is an improvement effort made by the Bank to Debtors/Customers who are experiencing difficulties in fulfilling their obligations (principal and/or interest/margin/profit sharing/ujrah) as long as the Debtor/Customer still has good business prospects and is assessed to be able to meet obligations after the Credit/Financing is restructured. Additionally, there is Covid-19 Restructuring, which refers to special handling for debtors/customers who are experiencing difficulties in meeting their obligations to the Bank due to their businesses being affected by the spread of COVID-19, either directly or indirectly, but still have business prospects and the ability to pay their obligations. |

# Laporan Publikasi Eksposur Risiko dan Permodalan untuk ATMR Risiko Kredit - Pendekatan Standar

## Publication Report on Risk Exposure and Capital for Credit Risk RWA - Standardized Approach

### Pengungkapan Aset Performing dan Non Performing

Disclosure of Performing and Non-Performing Assets

Periode Laporan : Desember 2024
Report Period : December 2024

### Bank Secara Konsolidasi dengan Entitas Anak

The Bank consolidated with Subsidiaries

dalam jutaan Rupiah | in million Rupiah

| | | *Performing* (Kualitas L dan DPK) (Quality L and DPK) | | *Non Performing* (Kualitas KL, D, M) (Quality KL, D, M) | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | | | Tagihan yang Mengalami Penurunan Nilai Impaired Receivables | | Tagihan yang Tidak Mengalami Penurunan Nilai Non Impaired Receivables | | | |
| | | | | | | Memiliki Tunggakan > 90 Hari > 90 days past due | | Memiliki Tunggakan ≤ 90 Hari ≤ 90 days past due | |
| | | Nilai Tercatat Bruto Gross | CKPN Allowance for Impairment Losses | Nilai Tercatat Bruto Gross | CKPN Allowance for Impairment Losses | Nilai Tercatat Bruto Gross | CKPN Allowance for Impairment Losses | Nilai Tercatat Bruto Gross | CKPN Allowance for Impairment Losses |
| | | a | b | c | d | e | f | g | h |
| 1 | Surat Berharga Securities | 22.162.929 | - | 466.291 | - | | | | |
| 2 | Kredit Loans | 14.481.024 | 606.004 | 217.680 | 60.341 | | | | |
| | a. Korporasi Corporate | 7.819.097 | 356.247 | 129.922 | 1.348 | | | | |
| | b. Ritel Retail | 6.661.927 | 249.757 | 87.758 | 58.993 | | | | |
| 3 | Transaksi Rekening Administratif Administrative Account Transactions | 4.395.592 | - | - | - | | | | |
| 4 | Penempatan Placement | 16.472.477 | - | - | - | | | | |
| 5 | Aset Lainnya Other Assets | 2.720.091 | - | - | - | | | | |
| 6 | Derivatif selain Kredit Derivatives other than Credit | 2.292 | - | - | - | | | | |

## Bank Secara Individu
## Bank Individually

dalam jutaan Rupiah | in million Rupiah

| | | *Performing* (Kualitas L dan DPK) (Quality L and DPK) | | *Non Performing* (Kualitas KL, D, M) (Quality KL, D, M) | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | | | Tagihan yang Mengalami Penurunan Nilai Impaired Receivables | | Tagihan yang Tidak Mengalami Penurunan Nilai Non Impaired Receivables | | | |
| | | | | | | Memiliki Tunggakan > 90 Hari > 90 days past due | | Memiliki Tunggakan ≤ 90 Hari ≤ 90 days past due | |
| | | Nilai Tercatat Bruto Gross | CKPN Allowance for Impairment Losses | Nilai Tercatat Bruto Gross | CKPN Allowance for Impairment Losses | Nilai Tercatat Bruto Gross | CKPN Allowance for Impairment Losses | Nilai Tercatat Bruto Gross | CKPN Allowance for Impairment Losses |
| | | a | b | c | d | e | f | g | h |
| 1 | Surat Berharga Securities | 17.169.244 | - | 466.291 | - | | | | |
| 2 | Kredit Loans | 11.006.108 | 606.004 | 210.588 | 53.952 | | | | |
| | a. Korporasi Corporate | 5.978.333 | 356.247 | 129.922 | 1.348 | | | | |
| | b. Ritel Retail | 5.027.775 | 249.757 | 80.666 | 52.604 | | | | |
| 3 | Transaksi Rekening Administratif Administrative Account Transactions | 4.395.342 | - | - | - | | | | |
| 4 | Penempatan Placement | 14.878.937 | - | - | - | | | | |
| 5 | Aset Lainnya Other Assets | 2.531.006 | - | - | - | | | | |
| 6 | Derivatif selain Kredit Derivatives other than Credit | 2.292 | - | - | - | | | | |

# Laporan Publikasi Eksposur Risiko dan Permodalan untuk ATMR Risiko Kredit - Pendekatan Standar

## Publication Report on Risk Exposure and Capital for Credit Risk RWA - Standardized Approach

### Pengungkapan Aset Restrukturisasi Performing dan Non-Performing

Disclosure of Performing and Non-Performing Restructuring Assets

Periode Laporan : Desember 2024
Report Period : December 2024

### Bank Secara Konsolidasi dengan Entitas Anak

The Bank consolidated with Subsidiaries

| | | *Performing* (Kualitas L dan DPK \| Quality L and DPK) | | *Non Performing* (Kualitas KL, D dan M \| Quality KL, D, M) | |
|---|---|---|---|---|---|
| | | Nilai Tercatat Bruto Gross | CKPN Allowance for Impairment Losses | Nilai Tercatat Bruto Gross | CKPN Allowance for Impairment Losses |
| | | a | b | c | d |
| 1 | Surat Berharga | - | - | - | - |
| 2 | Kredit | 974.284 | 330.683 | 22.910 | 12.070 |
| | a. Korporasi | 823.624 | 320.560 | 1.792 | 870 |
| | b. Ritel | 150.660 | 10.123 | 21.118 | 11.200 |
| 3 | Transaksi Rekening Administratif | 2.537 | - | - | - |
| 4 | Penempatan | - | - | - | - |
| 5 | Aset Lainnya | - | - | - | - |
| 6 | Derivatif selain Kredit | - | - | - | - |

### Bank Secara Individu

Bank Individually

| | | *Performing* (Kualitas L dan DPK \| Quality L and DPK) | | *Non Performing* (Kualitas KL, D dan M \| Quality KL, D, M) | |
|---|---|---|---|---|---|
| | | Nilai Tercatat Bruto Gross | CKPN Allowance for Impairment Losses | Nilai Tercatat Bruto Gross | CKPN Allowance for Impairment Losses |
| | | a | b | c | d |
| 1 | Surat Berharga | - | - | - | - |
| 2 | Kredit | 614.184 | 330.683 | 21.289 | 10.535 |
| | a. Korporasi | 464.879 | 320.560 | 1.792 | 870 |
| | b. Ritel | 149.305 | 10.123 | 19.497 | 9.665 |
| 3 | Transaksi Rekening Administratif | 2.537 | - | - | - |
| 4 | Penempatan | - | - | - | - |
| 5 | Aset Lainnya | - | - | - | - |
| 6 | Derivatif selain Kredit | - | - | - | - |

dalam jutaan Rupiah | in million Rupiah

| Stage 1 | | Stage 2 | | Stage 3 | | |
|---|---|---|---|---|---|---|
| **Nilai Tercatat Bruto** Gross | **CKPN** Allowance for Impairment Losses | **Nilai Tercatat Bruto** Gross | **CKPN** Allowance for Impairment Losses | **Nilai Tercatat Bruto** Gross | **CKPN** Allowance for Impairment Losses | |
| **e** | **f** | **g** | **h** | **i** | **j** | |
| - | - | - | - | - | - | Securities |
| 459.487 | 364.781 | 506.914 | 278.199 | 21.123 | 10.528 | Loans |
| 411.794 | 363.119 | 400.919 | 269.632 | 1.792 | 871 | a. Corporate |
| 47.693 | 1.662 | 105.995 | 8.567 | 19.331 | 9.657 | b. Retail |
| - | - | - | - | - | - | Administrative Account Transactions |
| - | - | - | - | - | - | Placement |
| - | - | - | - | - | - | Other Assets |
| - | - | - | - | - | - | Derivatives other than Credit |

dalam jutaan Rupiah | in million Rupiah

| Stage 1 | | Stage 2 | | Stage 3 | | |
|---|---|---|---|---|---|---|
| **Nilai Tercatat Bruto** Gross | **CKPN** Allowance for Impairment Losses | **Nilai Tercatat Bruto** Gross | **CKPN** Allowance for Impairment Losses | **Nilai Tercatat Bruto** Gross | **CKPN** Allowance for Impairment Losses | |
| **e** | **f** | **g** | **h** | **i** | **j** | |
| - | - | - | - | - | - | Securities |
| 109.474 | 52.490 | 506.914 | 278.199 | 21.123 | 10.528 | Loans |
| 63.960 | 50.927 | 400.919 | 269.632 | 1.792 | 871 | a. Corporate |
| 45.514 | 1.563 | 105.995 | 8.567 | 19.331 | 9.657 | b. Retail |
| - | - | - | - | - | - | Administrative Account Transactions |
| - | - | - | - | - | - | Placement |
| - | - | - | - | - | - | Other Assets |
| - | - | - | - | - | - | Derivatives other than Credit |

# Laporan Publikasi Eksposur Risiko dan Permodalan untuk ATMR Risiko Kredit - Pendekatan Standar

## Publication Report on Risk Exposure and Capital for Credit Risk RWA - Standardized Approach

### Pengungkapan Kualitatif terkait Teknik MRK (CRC)

**Qualitative Disclosures related to MRK Techniques (CRC)**

Periode Laporan : Desember 2024
Report Period : December 2024

### Bank Secara Konsolidasi dengan Entitas Anak

**The Bank consolidated with Subsidiaries**

| Analisa Kualitatif | Qualitative Analysis |
|---|---|
| Manajemen agunan yang diterapkan di Bank, termasuk penilaian agunan secara berkala, diatur pada ketentuan masing-masing produk sesuai segmentasi yang terdapat di Bank. Bank juga memiliki ketentuan terkait pelaksanaan penilaian agunan dan metode serta pendekatan penilaian berdasarkan Standar Penilaian Indonesia (SPI) dan Kode Etik Penilai Indonesia (KEPI). | The collateral management implemented at the Bank, including periodic collateral assessments, is regulated according to the provisions of each product based on the segmentation present at the Bank. The Bank also has regulations regarding the implementation of collateral assessments and the methods and approaches to valuation based on the Indonesian Valuation Standards (SPI) and the Indonesian Appraisers' Code of Ethics (KEPI). |
| Bank secara Individu memiliki tagihan yang tidak dijamin dengan teknik MRK sebesar Rp 22,801,965 (dalam jutaan rupiah) dan memiliki tagihan yang dijamin dengan teknik MRK sebesar Rp 27,379,751 (dalam jutaan rupiah). Teknik MRK - Agunan dilakukan dengan cara mengurangi nilai tagihan bersih dengan nilai agunan, dimana faktor pengurang ATMR Kredit pada Bank adalah agunan berupa cash collateral, sehingga bobot risiko sebesar 100%. | Individually, the Bank has receivables that are unsecured using the MRK technique amounting to Rp 22,801,965 (in millions of rupiah) and receivables that are secured using the MRK technique amounting to Rp 27,379,751 (in millions of rupiah). The MRK technique for collateral is conducted by deducting the net receivable value by the collateral value, where the credit risk-weighted asset reduction factor at the Bank is collateral in the form of cash collateral, resulting in a risk weight of 100%. |

## Pengungkapan Penggunaan Peringkat Kredit External (CRD)
Disclosure of the Use of External Credit Ratings (CRD)

| a. | Format Laporan | Report Format |
|---|---|---|

Lembaga pemeringkat yang digunakan adalah Pemeringkat Efek Indonesia (Pefindo) dan Fitch Ratings Indonesia untuk entitas lokal. Sedangkan untuk entitas asing menggunakan rating atau peringkat yang dikeluarkan oleh lembaga pemeringkat Standar and Poor's (S&P), Fitch Ratings, atau Moody's Investor Service. Hal tersebut sesuai SEOJK no.37/SEOJK.03/2016 tentang "Lembaga Pemeringkat dan Peringkat yang diakui Otoritas Jasa Keuangan", yaitu :

The rating agencies used are the Indonesian Securities Rating Agency (Pefindo) and Fitch Ratings Indonesia for local entities. Meanwhile, for foreign entities, ratings issued by rating agencies such as Standard & Poor's (S&P), Fitch Ratings, or Moody's Investor Service are used. This is in accordance with Financial Services Authority Regulation No. 37/SEOJK.03/2016 regarding "Rating Agencies and Ratings Recognized by the Financial Services Authority", which states:

**Tabel 1. Daftar Lembaga Pemeringkat dan Peringkat yang Diakui Otoritas Jasa Keuangan**

| Perusahaan Pemeringkat | Peringkat Jangka Pendek | Peringkat Jangka Menengah dan Jangka Panjang |
|---|---|---|
| Fitch Ratings | F1+; F1; F2; F3; B; C; D | "AAA; AA+; AA; AA-; A+; A; A-; BBB+; BBB; BBB-; BB+; BB; BB-; B+; B; B-; CCC; CC; C; RD; D" |
| Moody's Investor Service | P-1; P-2; P-3; NP | "Aaa; Aa1; Aa2; Aa3; A1; A2; A3; Baa1; Baa2; Baa3; Ba1; Ba2; Ba3; B1; B2; B3; Caa1; Caa2; Caa3; Ca; C" |
| Standard and Poor's | "A-1; A-2; A-3; B; B-1; B-2; B-3; C; D" | "AAA; AA+; AA; AA-; A+; A; A-; BBB+; BBB; BBB-; BB+; BB; BB-; B+; B; B-; CCC+; CCC; CCC-; CC; C; D" |
| PT. Fitch Ratings Indonesia | F1+(idn); F1(idn); F2(idn); F3(idn); B(idn); C(idn); D(idn) | "AAA(idn); AA+(idn); AA(idn); AA-(idn); A+(idn); A(idn); A-(idn); BBB+(idn); BBB(idn); BBB-(idn); BB+(idn); BB(idn); BB-(idn); B+(idn); B(idn); B-(idn); CCC(idn); CC(idn); C(idn); RD(idn); D(idn)" |
| PT. Pemeringkat Efek Indonesia | idA1; idA2; idA3; idA4;idB; idC; idD | "idAAA; idAA+; idAA; idAA-; idA+;idA; idA-; idBBB+; idBBB; idBBB-;idBB+; idBB; idBB-; idB+; idB;idB-; idCCC; idSD; idD" |

Portofolio yang menggunakan peringkat adalah portofolio surat utang berupa obligasi dan sukuk, serta Medium Term Notes (MTN) yang diterbitkan oleh entitas. Tidak ada proses yang digunakan untuk mentransfer peringkat pihak lawan ke peringkat surat berharga ke dalam aset yang sebanding dengan banking book karena dilakukan sesuai dengan pemetaan peringkat berdasarkan informasi dari OJK, yaitu :

The portfolio that utilizes ratings consists of debt securities portfolios such as bonds and sukuk, as well as Medium Term Notes (MTNs) issued by entities.
There is no process used to transfer counterparty ratings to bond ratings within assets that are comparable to the banking book because it is carried out in accordance with the rating mapping based on information from OJK, namely:

**Tabel 4. Pemetaan Peringkat**

**a. Peringkat Jangka Panjang**

| Lembaga Pemeringkat Domestik | | Lembaga Pemeringkat Internasional | | |
|---|---|---|---|---|
| Fitch Indonesia | Pefindo | Fitch Ratings | Moody's Investor Service | Standard and Poor's |
| AAA(idn) | idAAA | AAA | Aaa | AAA |
| AA+(idn) s.d AA-(idn) | idAA+ s.didAA- | AA+ s.d AA- | Aa1 s.d Aa3 | AA+ s.d AA- |
| A+(idn) s.d A-(idn) | idA+ s.d idA- | A+ s.d A- | A1 s.d A3 | A+ s.d A- |
| BBB+(idn) s.d BBB-(idn) | idBBB+ s.didBBB- | BBB+ s.d BBB- | Baa1 s.d Baa3 | BBB+ s.d BBB- |
| BB+(idn) s.d BB-(idn) | idBB+ s.didBB- | BB+ s.d BB- | Ba1 s.d Ba3 | BB+ s.d BB- |
| B+(idn) s.d B-(idn) | idB+ s.d idB- | B+ s.d B- | B1 s.d B3 | B+ s.d B- |
| Kurang dari B-(idn) | Kurang daridB- | Kurang dari B- | Kurang dari B3 | Kurang dari B- |

**b. Peringkat Jangka Pendek**

| Lembaga Pemeringkat Domestik | | Lembaga Pemeringkat Internasional | | |
|---|---|---|---|---|
| Fitch Indonesia | Pefindo | Fitch Ratings | Moody's Investor Service | Standard and Poor's |
| F1+(idn) s.d F1 (idn) | idA1 | F1+ s.d F1 | P-1 | A-1 |
| F2(idn) | idA2 | F2 | P-2 | A-2 |
| F3(idn) | idA3 s.d idA4 | F3 | P-3 | A-3 |
| Kurang dari F3(idn) | Kurang dari idA4 | Kurang dari F3 | Kurang dari P-3 | Kurang dari A-3 |

# Laporan Publikasi Eksposur Risiko dan Permodalan untuk ATMR Risiko Kredit - Pendekatan Standar

## Publication Report on Risk Exposure and Capital for Credit Risk RWA - Standardized Approach

### Pengungkapan Kuantitatif terkait Teknik MRK (CR3)

Quantitative Disclosures related to MRK Techniques (CR3)

Periode Laporan : Desember 2024
Report Period : December 2024

### Bank Secara Konsolidasi dengan Entitas Anak

The Bank consolidated with Subsidiaries

dalam jutaan Rupiah | in million Rupiah

| | | Tagihan yang Tidak Dijamin dengan Teknik MRK Receivables not Guaranteed by MRK Technique | Tagihan yang Dijamin dengan Teknik MRK Receivables Guaranteed by MRK Technique | Tagihan yang Dijamin Receivables Guaranteed with | | | | Tagihan yang Dijamin dengan Derivatif Kredit Receivables Guaranteed with Credit Derivatives |
|---|---|---|---|---|---|---|---|---|
| | | | | Agunan Collateral | Garansi Guaranteed | Asuransi Kredit Insurance Credit | Lainnya Others | |
| | | a | b | c | d | e | f | g |
| 1 | Kredit Loans | 11.592.652 | 2.578.947 | 2.578.947 | - | - | - | |
| 2 | Surat Berharga Securities | 7.055.192 | 15.574.026 | 15.574.026 | - | - | - | |
| 3 | Penempatan Placement | 2 | 16.472.477 | 16.472.477 | - | - | - | |
| 4 | Aset Lainnya Other Assets | 2.720.091 | - | - | - | - | - | |
| 5 | Derivatif selain Kredit Derivatives other than Credit | 4.070.424 | 327.461 | 327.461 | - | - | - | |
| **6** | **Total** | **25.438.361** | **34.952.911** | **34.952.911** | **-** | **-** | **-** | |
| 7 | Kredit dan Surat Berharga yang Telah Jatuh Tempo Due Loans and Securities | 42.623 | - | - | - | - | - | |

| Pengungkapan Tambahan | Additional Disclosure |
|---|---|
| Perubahan Nilai Kuantitatif terkait Teknik MRK disebabkan adanya metode perhitungan baru mengacu pada SEOJK Nomor 24/SEOJK.03/2021 Tentang Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Kredit dengan Menggunakan Pendekatan Standar Bagi Bank Umum | Changes in Quantitative Value related to the MRK Technique are due to the adoption of a new calculation method in accordance with Financial Services Authority Regulation No. 24/SEOJK.03/2021 Regarding the Calculation of Risk-Weighted Assets for Credit Risk Using the Standardized Approach for Commercial Banks. |

## Bank Secara Individu
## Bank Individually

dalam jutaan Rupiah | in million Rupiah

| | | Tagihan yang Tidak Dijamin dengan Teknik MRK Receivables not Guaranteed by MRK Technique | Tagihan yang Dijamin dengan Teknik MRK Receivables Guaranteed by MRK Technique | Tagihan yang Dijamin Receivables Guaranteed with | | | | Tagihan yang Dijamin dengan Derivatif Kredit Receivables Guaranteed with Credit Derivatives |
|---|---|---|---|---|---|---|---|---|
| | | | | Agunan Collateral | Garansi Guaranteed | Asuransi Kredit Insurance Credit | Lainnya Others | |
| | | a | b | c | d | e | f | g |
| 1 | Kredit Loans | 9.171.953 | 1.524.705 | 1.524.705 | - | - | - | |
| 2 | Surat Berharga Securities | 6.986.885 | 10.648.648 | 10.648.648 | - | - | - | |
| 3 | Penempatan Placement | 2 | 14.878.937 | 14.878.937 | - | - | - | |
| 4 | Aset Lainnya Other Assets | 2.531.006 | - | - | - | - | - | |
| 5 | Derivatif selain Kredit Derivatives other than Credit | 4.070.174 | 327.461 | 327.461 | - | - | - | |
| **6** | **Total** | **22.760.020** | **27.379.751** | **27.379.751** | **-** | **-** | **-** | |
| 7 | Kredit dan Surat Berharga yang Telah Jatuh Tempo Due Loans and Securities | 41.945 | - | - | - | - | - | |

## Laporan Publikasi Eksposur Risiko dan Permodalan untuk ATMR Risiko Kredit - Pendekatan Standar

**Publication Report on Risk Exposure and Capital for Credit Risk RWA - Standardized Approach**

### Pengungkapan Eksposur Risiko Kredit dan Dampak Teknik MRK (CR4)

Disclosure of Credit Risk Exposure and Impact of MRK Techniques (CR4)

Periode Laporan : Desember 2024
Report Period : December 2024

### Bank Secara Konsolidasi dengan Entitas Anak

The Bank consolidated with Subsidiaries

| | | Tagihan Bersih Sebelum Penerapan FKK dan Teknik MRK<br>Net Receivables Before the Application of FKK and MRK Technique | |
|---|---|---|---|
| | | Kategori Portofolio Laporan Posisi Keuangan<br>Financial Statement Position | TRA<br>Administrative Account Transactions |
| | | a | b |
| 1 | Tagihan kepada Pemerintah | 26.481.226 | 1.191.341 |
| 2 | Tagihan kepada Entitas Sektor Publik | 2.009.545 | - |
| 3 | Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional | - | - |
| 4 | Tagihan kepada Bank | 5.454.993 | - |
| | Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lain1) | 905.052 | 142.945 |
| 5 | Tagihan berupa Covered Bond | - | - |
| 6 | Tagihan kepada Korporasi - Eksposur Korporasi Umum 2) | 12.600.487 | 3.520.812 |
| | Tagihan kepada perusahaan efek dan lembaga jasa keuangan lain3) | - | - |
| | Eksposur Pembiayaan Khusus4) | - | - |
| 7 | Tagihan berupa Surat Berharga/Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya | - | - |
| 8 | Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel | 4.301.986 | 344.169 |
| 9 | Kredit Beragun Properti | - | - |
| | Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Tidak Bergantung Secara Material pada Arus Kas Properti | 135.238 | - |
| | Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Bergantung Secara Material pada Arus Kas Properti | 4.911 | - |
| | Kredit Beragun Properti Komersial yang Pembayarannya Tidak Bergantung Secara Material pada Arus Kas Properti | 133 | - |
| | Kredit Beragun Properti Komersial yang Pembayarannya Bergantung Secara Material pada Arus Kas Properti | - | - |
| | Kredit Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi | 228.807 | 349.521 |
| 10 | Tagihan yang Telah Jatuh Tempo | 42.634 | - |
| 11 | Aset Lainnya | 2.720.091 | - |
| **12** | **Total** | **54.885.107** | **5.548.788** |

| Pengungkapan Tambahan |
|---|
| Perubahan Nilai Eksposur Risiko Kredit dan Dampak Teknik MRK disebabkan adanya metode perhitungan baru mengacu pada SEOJK Nomor 24/SEOJK.03/2021 Tentang Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Kredit dengan Menggunakan Pendekatan Standar Bagi Bank Umum, dimana Bank menggunakan Cadangan Kerugian Penurunan Nilai (CKPN) sebagai pengurang tagihan dan dikenakan Faktor Konversi Kredit (FKK) untuk Transaksi Rekening Administratif (TRA) serta menggunakan teknik Mitigasi Risiko Kredit (MRK) sebagai pengurang Aset Tertimbang Menurut Risiko (ATMR). |

dalam jutaan Rupiah | in million Rupiah

| Tagihan Bersih Setelah Penerapan FKK dan Teknik Net Receivables After the Application of FKK and MRK Technique | | ATMR dan Rata-rata Bobot Risiko RWA and Average Risk Weight | | Portfolio Category |
|---|---|---|---|---|
| Laporan Posisi Keuangan Financial Statement Position | TRA Administrative Account Transactions | ATMR Risk Weighted Assets (RWA) | Persentase Rata-rata Bobot Risiko Average Risk Weighting (e/(c+d)) | |
| c | d | e | f | |
| 26.481.226 | 1.191.341 | - | 0,00% | Receivables from Government |
| 2.009.545 | - | 787.164 | 39,17% | Receivables from Public Sector Entities |
| - | - | - | 0,00% | Receivables from Multilateral Development Banks and International Institutions |
| 5.454.993 | - | 29.691 | 0,54% | Receivables from Banks |
| 905.052 | 24.645 | 338.973 | 36,46% | Receivables from Securities Companies and Other Financial Services Institutions1) |
| - | - | - | 0,00% | Receivables in the form of Covered Bond |
| 12.600.487 | 711.292 | 9.713.151 | 72,97% | Receivables from Corporations - General Corporate Exposure 2) |
| - | - | - | 0,00% | Receivables from Securities Companies and Other Financial Services Institutions3) |
| - | - | - | 0,00% | Special Financing Exposure4) |
| - | - | - | 0,00% | Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments |
| 4.301.986 | 136.716 | 3.242.955 | 73,06% | Receivables from Microbusiness, Small Business, and Retail Portfolio |
| - | - | - | 0,00% | Property Collateralized Loans |
| 135.238 | - | 202.857 | 150,00% | Residential Property Collateralized Loans which the Payments Are Not Materially Dependent on Property Cash Flow |
| 4.911 | - | 1.719 | 35,00% | Residential Property Collateralized Loans which the Payments Are Materially Dependent on Property Cash Flow |
| 133 | - | 200 | 150,38% | Commercial Property Collateralized Loans which the Payments Are Not Materially Dependent on Property Cash Flow |
| - | - | - | 0,00% | Commercial Property Collateralized Loans which the Payments Are Materially Dependent on Property Cash Flow |
| 228.807 | 35.524 | 387.527 | 146,61% | Land Acquisition, Land Processing, and Construction Loans |
| 42.634 | - | 41.200 | 96,64% | Due Receivables |
| 2.720.091 | - | 2.220.836 | 81,65% | Other Assets |
| **54.885.103** | **2.099.518** | **16.966.272** | **29,77%** | **Total** |

| Additional Disclosure |
|---|
| Changes in Credit Risk Exposure Value and the Impact of MRK Techniques are due to the new calculation method referring to SEOJK Number 24/ SEOJK.03/2021 concerning Calculation of Risk-Weighted Assets for Credit Risk Using the Standardized Approach for Commercial Banks, where the Bank uses Allowance for Impairment Losses (CKPN) as a deduction for receivables and is subject to Credit Conversion Factor (FKK) for Administrative Account Transactions (TRA) and uses Credit Risk Mitigation (MRK) techniques as a deduction for Risk-Weighted Assets (RWA). |

## Bank Secara Individu
**Bank Individually**

| | | Tagihan Bersih Sebelum Penerapan FKK dan Teknik MRK<br>Net Receivables Before the Application of FKK and MRK Technique | |
|---|---|---|---|
| | | Kategori Portofolio Laporan Posisi Keuangan<br>Financial Statement Position | TRA<br>Administrative Account Transactions |
| | | a | b |
| 1 | Tagihan kepada Pemerintah | 19.703.724 | 1.191.341 |
| 2 | Tagihan kepada Entitas Sektor Publik | 2.009.545 | - |
| 3 | Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional | - | - |
| 4 | Tagihan kepada Bank | 4.667.186 | - |
| | Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lain1) | 905.052 | 142.945 |
| 5 | Tagihan berupa Covered Bond | - | - |
| 6 | Tagihan kepada Korporasi - Eksposur Korporasi Umum 2) | 10.691.415 | 3.520.812 |
| | Tagihan kepada perusahaan efek dan lembaga jasa keuangan lain3) | - | - |
| | Eksposur Pembiayaan Khusus4) | - | - |
| 7 | Tagihan berupa Surat Berharga/Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya | - | - |
| 8 | Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel | 3.719.112 | 343.919 |
| 9 | Kredit Beragun Properti | - | - |
| | Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Tidak Bergantung Secara Material pada Arus Kas Properti | 135.238 | - |
| | Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Bergantung Secara Material pada Arus Kas Properti | - | - |
| | Kredit Beragun Properti Komersial yang Pembayarannya Tidak Bergantung Secara Material pada Arus Kas Properti | 133 | - |
| | Kredit Beragun Properti Komersial yang Pembayarannya Bergantung Secara Material pada Arus Kas Properti | - | - |
| | Kredit Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi | 228.807 | 349.521 |
| 10 | Tagihan yang Telah Jatuh Tempo | 41.956 | - |
| 11 | Aset Lainnya | 2.531.006 | - |
| **12** | **Total** | **44.633.178** | **5.548.538** |

dalam jutaan Rupiah | in million Rupiah

| Tagihan Bersih Setelah Penerapan FKK dan Teknik Net Receivables After the Application of FKK and MRK Technique | | ATMR dan Rata-rata Bobot Risiko RWA and Average Risk Weight | | Portfolio Category |
|---|---|---|---|---|
| Laporan Posisi Keuangan Financial Statement Position | TRA Administrative Account Transactions | ATMR Risk Weighted Assets (RWA) | Persentase Rata-rata Bobot Risiko Average Risk Weighting (e/(c+d)) | |
| c | d | e | f | |
| 19.703.724 | 1.191.341 | - | 0,00% | Receivables from Government |
| 2.009.545 | - | 787.164 | 39,17% | Receivables from Public Sector Entities |
| - | - | - | 0,00% | Receivables from Multilateral Development Banks and International Institutions |
| 4.667.186 | - | 29.691 | 0,64% | Receivables from Banks |
| 905.052 | 24.645 | 338.973 | 36,46% | Receivables from Securities Companies and Other Financial Services Institutions1) |
| - | - | - | 0,00% | Receivables in the form of Covered Bond |
| 10.691.415 | 711.292 | 7.851.472 | 68,86% | Receivables from Corporations - General Corporate Exposure 2) |
| - | - | - | 0,00% | Receivables from Securities Companies and Other Financial Services Institutions3) |
| - | - | - | 0,00% | Special Financing Exposure4) |
| - | - | - | 0,00% | Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments |
| 3.719.112 | 136.591 | 2.807.586 | 72,82% | Receivables from Microbusiness, Small Business, and Retail Portfolio |
| - | - | - | 0,00% | Property Collateralized Loans |
| 135.238 | - | 202.857 | 150,00% | Residential Property Collateralized Loans which the Payments Are Not Materially Dependent on Property Cash Flow |
| - | - | - | 0,00% | Residential Property Collateralized Loans which the Payments Are Materially Dependent on Property Cash Flow |
| 133 | - | 200 | 150,38% | Commercial Property Collateralized Loans which the Payments Are Not Materially Dependent on Property Cash Flow |
| - | - | - | 0,00% | Commercial Property Collateralized Loans which the Payments Are Materially Dependent on Property Cash Flow |
| 228.807 | 35.524 | 387.527 | 146,61% | Land Acquisition, Land Processing, and Construction Loans |
| 41.956 | - | 40.522 | 96,58% | Due Receivables |
| 2.531.006 | - | 2.071.870 | 81,86% | Other Assets |
| **44.633.174** | **2.099.393** | **14.517.860** | **31,07%** | **Total** |

# Laporan Publikasi Eksposur Risiko dan Permodalan untuk ATMR Risiko Kredit - Pendekatan Standar

## Publication Report on Risk Exposure and Capital for Credit Risk RWA - Standardized Approach

### Pengungkapan Eksposur berdasarkan Kelas Aset dan Bobot Risiko (CR5)

Disclosure of Exposure by Asset Class and Risk Weight (CR5)

Periode Laporan : Desember 2024
Report Period : December 2024

### Bank Secara Konsolidasi dengan Entitas Anak

The Bank consolidated with Subsidiaries

| | Kategori Portofolio | 0% | 10% | 15% | 20% | 25% | 30% | 35% | 40% | 45% | 50% | 60% | 65%5) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | Tagihan kepada Pemerintah | 27.672.568 | | | - | | | | | | - | | |
| 2 | Tagihan kepada Entitas Sektor Publik | | | | 725.362 | | | | | | 1.284.183 | | |
| 3 | Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional | - | | | - | | - | | | | - | | |
| 4 | Tagihan kepada Bank | | | | 5.430.135 | | - | | - | | 9.557 | | |
| | Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lain1) | | | | - | | - | | 905.052 | | - | | |
| 5 | Tagihan berupa *Covered Bond* | | - | - | - | - | | - | | | - | | |
| 6 | Tagihan kepada Korporasi Umum2) | | | | 1.842.479 | | | | | | 1.177.541 | | - |
| | Tagihan kepada perusahaan efek dan lembaga jasa keuangan lain3) | | | | - | | | | | | - | | - |
| | Eksposur Pembiayaan Khusus4) | | | | - | | | | | | - | | |
| 7 | Tagihan berupa Surat Berharga/Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya | | | | | | | | | | | | |
| 8 | Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel | | | | | | | | | - | | | |
| 9 | Kredit Beragun Properti | - | | | - | - | - | - | - | - | - | - | - |
| | Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Tidak Bergantung Secara Material pada Arus Kas Properti | - | | | - | - | - | | - | | - | | - |
| | tanpa pendekatan pembagian kredit5) | - | | | - | - | - | | - | | - | | - |
| | dengan menggunakan pendekatan pembagian kredit (dijamin)5) | | | | - | | | | | | | | |
| | dengan menggunakan pendekatan pembagian kredit (dijamin)5) | - | | | - | | - | | - | | - | | - |
| | Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Bergantung Secara Material pada Arus Kas Properti | | | | | | - | - | | - | | - | |
| | Kredit Beragun Properti Komersial yang Pembayarannya Tidak Bergantung Secara Material pada Arus Kas Properti | - | | | - | | - | | - | | - | - | - |
| | tanpa pendekatan pembagian kredit5) | - | | | - | | - | | - | | - | - | |
| | dengan menggunakan pendekatan pembagian kredit (dijamin)5) | | | | | | | | | | | - | |
| | dengan menggunakan pendekatan pembagian kredit ( dijamin)5) | - | | | - | | - | | - | | - | | - |
| | Kredit Beragun Properti Komersial yang Pembayarannya Bergantung Secara Material pada Arus Kas Properti | | | | | | | | | | | | |
| | Kredit Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi5) | | | | | | | | | | | | |
| 10 | Tagihan yang Telah Jatuh Tempo | | | | | | | | | | 2.869 | | |
| 11 | Aset Lainnya | 509.207 | | | - | | | | | | | | |

| No | Bobot Risiko<br>Risk weight | Tagihan Bersih Laporan Posisi Keuangan<br>Net Receivables Statement Financial Position | Tagihan Bersih TRA (sebelum pengenaan FKK)<br>TRA Net Receivables (Before FKK Application) | Rata-rata FKK<br>FKK Average | Tagihan Bersih (Setelah pengenaan FKK dan Teknik MRK)<br>Net Receivables (After the Application of FKK and MRK Technique) |
|---|---|---|---|---|---|
| 1 | < 40% | 34.992.884 | 1.191.777 | 1.191.777 | 36.184.661 |
| 2 | 40%-70% | 3.354.203 | - | 25.000 | 3.379.203 |
| 3 | 75% | 4.175.797 | 344.169 | 122.540 | 4.298.337 |
| 4 | 85% | - | - | - | - |
| 5 | 90%-100% | 11.946.409 | 3.520.813 | 700.468 | 12.646.877 |
| 6 | 105%-130% | - | - | - | - |
| 7 | 150% | 415.375 | 492.466 | 60.169 | 475.544 |
| 8 | 250% | - | - | - | - |
| 9 | 400% | - | - | - | - |
| 10 | 1250% | - | - | - | - |
| 11 | **Total Tagihan Bersih**<br>**Total net billings** | **54.884.668** | **5.549.225** | **2.099.953** | **56.984.621** |

dalam jutaan Rupiah | In million Rupiah

| 70% | 75% | 80% | 85% | 90% | 100% | 105% | 110% | 130% | 150% | 250% | 400% | 1250%5) | Lainnya Others | Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables after FKK and MRK Technique | Portfolio Category |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | - | | | | - | | | | - | 27.672.568 | Receivables from Government |
| | | | | | - | | | | - | | | | - | 2.009.545 | Receivables from Public Sector Entities |
| | | | | | - | | | | - | | | | - | - | Receivables from Multilateral Development Banks and International Institutions |
| | - | | | | - | | | | 15.300 | | | | - | 5.454.992 | Receivables from Banks |
| | - | | | | - | | | | 24.645 | | | | - | 929.697 | Receivables from Securities Companies and Other Financial Services Institutions1) |
| | | | | | - | | | | | | | | - | - | Receivables in the form of Covered Bond |
| | 447 | - | - | | 10.291.312 | | | - | - | | | | - | 13.311.778 | Receivables from Corporations - General Corporate Exposure 2) |
| | - | | - | | - | | | | - | | | | - | - | Receivables from Securities Companies and Other Financial Services Institutions3) |
| | - | - | | | - | | | - | - | | | | - | - | Special Financing Exposure4) |
| | | | | | - | | | | - | - | - | | - | - | Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments |
| | 4.297.890 | | - | | 140.812 | | | | | | | | - | 4.438.702 | Receivables from Microbusiness, Small Business, and Retail Portfolio |
| - | - | - | - | - | - | - | - | | - | | | | - | - | Property Collateralized Loans |
| - | - | | - | | - | | | | 135.238 | | | | - | 140.149 | Residential Property Collateralized Loans which the Payments Are Not Materially Dependent on Property Cash Flow |
| - | - | | - | | - | | | | - | | | | - | - | Without a Credit-Sharing Approach5) |
| | | | | | | | | | | | | | - | - | Using the Credit-Sharing Approach (Guaranteed)5) |
| | - | | - | | - | | | | - | | | | - | - | Using the Credit-Sharing Approach (Guaranteed)5) |
| | - | | | | | - | | | - | | | | - | - | Residential Property Collateralized Loans which the Payments Are Materially Dependent on Property Cash Flow |
| | - | | - | | 133 | | | | - | | | | - | 133 | Commercial Property Collateralized Loans which the Payments Are Not Materially Dependent on Property Cash Flow |
| | | | | | | | | | | | | | - | - | Without a Credit-Sharing Approach5) |
| | | | | | | | | | | | | | - | - | Using the Credit-Sharing Approach (Guaranteed)5) |
| | - | | - | | - | | | | - | | | | - | - | Using the Credit-Sharing Approach (Guaranteed)5) |
| - | | | | - | | | - | | - | | | | - | - | Commercial Property Collateralized Loans which the Payments Are Materially Dependent on Property Cash Flow |
| | | | | | - | | | | 264.331 | | | | - | 264.331 | Land Acquisition, Land Processing, and Construction Loans |
| | | | | | 39.765 | | | | - | | | | - | 42.634 | Due Receivables |
| | | | | | 2.174.855 | | | | 36.030 | | | - | - | 2.720.091 | Other Assets |

| Pengungkapan Tambahan | Additional Disclosure |
|---|---|
| Perubahan Nilai Eksposur berdasarkan Kelas Aset dan Bobot Risiko disebabkan adanya metode perhitungan baru mengacu pada SEOJK Nomor 24/SEOJK.03/2021 Tentang Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Kredit dengan Menggunakan Pendekatan Standar Bagi Bank Umum, dimana Bank menggunakan Cadangan Kerugian Penurunan Nilai (CKPN) sebagai pengurang tagihan dan dikenakan Faktor Konversi Kredit (FKK) untuk Transaksi Rekening Administratif (TRA) serta menggunakan teknik Mitigasi Risiko Kredit (MRK) sebagai pengurang Aset Tertimbang Menurut Risiko (ATMR). | Changes in the Value of Exposure based on Asset Class and Risk Weight are due to the new calculation method referring to SEOJK Number 24/SEOJK.03/2021 concerning the Calculation of Risk-Weighted Assets for Credit Risk Using the Standard Approach for Commercial Banks, where the Bank uses the Allowance for Impairment Losses (CKPN) as a deduction from receivables and applies the Credit Conversion Factor (FKK) for Administrative Account Transactions (TRA), as well as using the Credit Risk Mitigation (MRK) technique as a deduction from Risk-Weighted Assets (ATMR) |

## Bank Secara Individu
### Bank Individually

| | Kategori Portofolio | 0% | 10% | 15% | 20% | 25% | 30% | 35% | 40% | 45% | 50% | 60% | 65%5) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | Tagihan kepada Pemerintah | 20.895.066 | | | - | | | | | | - | | |
| 2 | Tagihan kepada Entitas Sektor Publik | | | | 725.362 | | | | | | 1.284.183 | | |
| 3 | Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional | - | | | - | | - | | | | - | | |
| 4 | Tagihan kepada Bank | | | | 4.642.328 | | - | | - | | 9.557 | | |
| | Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lain1) | | | | - | | - | | 905.052 | | - | | |
| 5 | Tagihan berupa *Covered Bond* | | - | - | - | - | | - | | | - | | |
| 6 | Tagihan kepada Korporasi Umum2) | | | | 1.816.163 | | | | | | 1.135.549 | | - |
| | Tagihan kepada perusahaan efek dan lembaga jasa keuangan lain3) | | | | - | | | | | | - | | - |
| | Eksposur Pembiayaan Khusus4) | | | | - | | | | | | - | | |
| 7 | Tagihan berupa Surat Berharga/Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya | | | | | | | | | | | | |
| 8 | Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel | | | | | | | | | - | | | |
| 9 | Kredit Beragun Properti | - | | | - | - | - | - | - | - | - | - | - |
| | Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Tidak Bergantung Secara Material pada Arus Kas Properti | - | | | - | - | - | | - | | - | | - |
| | tanpa pendekatan pembagian kredit5) | - | | | - | - | - | | - | | - | | - |
| | dengan menggunakan pendekatan pembagian kredit (dijamin)5) | | | | - | | | | | | | | |
| | dengan menggunakan pendekatan pembagian kredit (dijamin)5) | - | | | - | | - | | - | | - | | - |
| | Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Bergantung Secara Material pada Arus Kas Properti | | | | | | - | - | | - | | - | - |
| | Kredit Beragun Properti Komersial yang Pembayarannya Tidak Bergantung Secara Material pada Arus Kas Properti | - | | | - | | - | | - | | - | - | - |
| | tanpa pendekatan pembagian kredit5) | - | | | - | | - | | - | | - | - | |
| | dengan menggunakan pendekatan pembagian kredit (dijamin)5) | | | | | | | | | | | - | |
| | dengan menggunakan pendekatan pembagian kredit ( dijamin)5) | - | | | - | | - | | - | | - | | - |
| | Kredit Beragun Properti Komersial yang Pembayarannya Bergantung Secara Material pada Arus Kas Properti | | | | | | | | | | | | |
| | Kredit Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi5) | | | | | | | | | | | | |
| 10 | Tagihan yang Telah Jatuh Tempo | | | | | | | | | | 2.869 | | |
| 11 | Aset Lainnya | 469.088 | | | - | | | | | | | | |

| No | Bobot Risiko<br>Risk weight | Tagihan Bersih Laporan Posisi Keuangan<br>Net Receivables Statement Financial Position | Tagihan Bersih TRA (sebelum pengenaan FKK)<br>TRA Net Receivables (Before FKK Application) | Rata-rata FKK<br>FKK Average | Tagihan Bersih (Setelah pengenaan FKK dan Teknik MRK)<br>Net Receivables (After the Application of FKK and MRK Technique) |
|---|---|---|---|---|---|
| 1 | < 40% | 27.356.229 | 1.191.777 | 1.191.777 | 28.548.006 |
| 2 | 40%-70% | 3.312.211 | - | 25.000 | 3.337.211 |
| 3 | 75% | 3.630.441 | 343.919 | 122.415 | 3.752.856 |
| 4 | 85% | - | - | - | - |
| 5 | 90%-100% | 9.934.613 | 3.520.813 | 700.468 | 10.635.081 |
| 6 | 105%-130% | - | - | - | - |
| 7 | 150% | 399.245 | 492.466 | 60.169 | 459.414 |
| 8 | 250% | - | - | - | - |
| 9 | 400% | - | - | - | - |
| 10 | 1250% | - | - | - | - |
| 11 | **Total Tagihan Bersih<br>Total net billings** | **44.632.739** | **5.548.975** | **2.099.828** | **46.732.567** |

dalam jutaan Rupiah | in million Rupiah

| 70% | 75% | 80% | 85% | 90% | 100% | 105% | 110% | 130% | 150% | 250% | 400% | 1250%5) | Lainnya Others | Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables after FKK and MRK Technique | Portfolio Category |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | - | | | | - | | | | - | 20.895.066 | Receivables from Government |
| | | | | | - | | | | - | | | | - | 2.009.545 | Receivables from Public Sector Entities |
| | | | | | - | | | | - | | | | - | - | Receivables from Multilateral Development Banks and International Institutions |
| | - | | | | - | | | | 15.300 | | | | - | 4.667.185 | Receivables from Banks |
| | - | | | | - | | | | 24.645 | | | | - | 929.697 | Receivables from Securities Companies and Other Financial Services Institutions1) |
| | | | | | - | | | | | | | | - | - | Receivables in the form of Covered Bond |
| | 447 | - | - | | 8.450.548 | | | - | - | | | | - | 11.402.706 | Receivables from Corporations - General Corporate Exposure 2) |
| | - | | - | | - | | | | - | | | | - | - | Receivables from Securities Companies and Other Financial Services Institutions3) |
| | - | - | | | - | | | - | - | | | | - | - | Special Financing Exposure4) |
| | | | | | - | | | | - | - | - | | - | - | Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments |
| | 3.752.409 | | - | | 103.294 | | | | - | | | | - | 3.855.703 | Receivables from Microbusiness, Small Business, and Retail Portfolio |
| - | - | | - | - | - | - | - | | - | | | | - | - | Property Collateralized Loans |
| - | - | | - | | - | | | | 135.238 | | | | - | 135.238 | Residential Property Collateralized Loans which the Payments Are Not Materially Dependent on Property Cash Flow |
| - | - | | - | | - | | | | - | | | | - | - | Without a Credit-Sharing Approach5) |
| | | | | | - | | | | - | | | | - | - | Using the Credit-Sharing Approach (Guaranteed)5) |
| | - | | - | | - | | | | - | | | | - | - | Using the Credit-Sharing Approach (Guaranteed)5) |
| | - | | | | - | - | | | - | | | | - | - | Residential Property Collateralized Loans which the Payments Are Materially Dependent on Property Cash Flow |
| | - | | - | | 133 | | | | - | | | | - | 133 | Commercial Property Collateralized Loans which the Payments Are Not Materially Dependent on Property Cash Flow |
| | | | | | | | | | | | | | - | - | Without a Credit-Sharing Approach5) |
| | | | | | | | | | | | | | - | - | Using the Credit-Sharing Approach (Guaranteed)5) |
| | - | | - | | - | | | | - | | | | - | - | Using the Credit-Sharing Approach (Guaranteed)5) |
| - | | | | - | | | - | | - | | | | - | - | Commercial Property Collateralized Loans which the Payments Are Materially Dependent on Property Cash Flow |
| - | | | | - | - | | | | 264.331 | | | | - | 264.331 | Land Acquisition, Land Processing, and Construction Loans |
| | | | | | 39.087 | | | | - | | | | - | 41.956 | Due Receivables |
| | | | | | 2.042.019 | | | | 19.900 | | | | - | 2.531.006 | Other Assets |

## Laporan Publikasi Eksposur Risiko dan Permodalan untuk ATMR Risiko Kredit - Pendekatan Standar

**Publication Report on Risk Exposure and Capital for Credit Risk RWA - Standardized Approach**

### Pengungkapan Risiko Pasar dengan Menggunakan Metode Standar

**Disclosure of Market Risk Using Standardized Method**

Periode Laporan : Desember 2024
Report Period : December 2024

### Bank Secara Konsolidasi dengan Entitas Anak

**The Bank consolidated with Subsidiaries**

| Jenis Risiko | 31 Desember 2024 / December 31, 2024 | | | |
|---|---|---|---|---|
| | Individual | | | |
| | **Korelasi Menengah** Intermediate Correlation | **Korelasi Tinggi** High Correlation | **Korelasi Rendah** Low Correlation | **Beban Modul SBM** SBM Module Load |
| | **a** | **b** | **a** | **b** |
| a. Beban modal berdasarkan *sensitivity based method* | 198.849,35 | 218.134,09 | 141.556,33 | 218.134,09 |
| i. Kelas risiko GIRR | 72.342,15 | 75.434,44 | 69.111,64 | |
| *ii. Kelas risiko CSR (non-sekuritisasi)* | 121.512,71 | 138.513,14 | 66.755,85 | |
| iii. Kelas risiko CSR (sekuritisasi: non-CTP) | - | - | - | |
| iv. Kelas risiko CSR (sekuritisasi: CTP) | - | - | - | |
| v. Kelas risiko ekuitas | - | - | - | |
| vi. Kelas risiko komoditas | - | - | - | |
| vii. Kelas risiko nilai tukar | 4.994,49 | 4.186,52 | 5.688,84 | |
| b. Beban modal default risk capital (DRC) | 20.399,59 | | | |
| *c. Residual risk add-on (RRAO)* | - | | | |
| ***Beban Modal Risiko Pasar*** | **238.533,68** | | | |
| **ATMR Pilar 1 tambahan** | **-** | | | |
| **Credit Valuation Adjustment (CVA)** | **-** | | | |
| Pendekatan Dasar yang Disederhanakan | | | | |
| 100% ATMR SACCR | 9,04 | | | |
| **Total ATMR Risiko Pasar** | **2.981.680,05** | | | |

dalam jutaan Rupiah | in million Rupiah

| Konsolidasian Consolidated | | | | Type of risk |
|---|---|---|---|---|
| **Korelasi Menengah** Intermediate Correlation | **Korelasi Tinggi** High Correlation | Korelasi Rendah Low Correlation | **Beban Modul SBM** SBM Module Load | |
| **a** | **b** | **a** | **b** | |
| 198.449,78 | 217.608,50 | 141.236,31 | 217.608,50 | a. Capital charge based on sensitivity based method |
| 72.342,15 | 75.434,44 | 69.111,64 | | i. GIRR risk class |
| 121.512,71 | 138.513,14 | 66.755,85 | | ii. CSR risk class (non-securitization) |
| - | - | - | | iii. CSR risk class (securitized: non-CTP) |
| - | - | - | | iv. CSR risk class (securitization: CTP) |
| - | - | - | | v. Equity risk class |
| - | - | - | | vi. Commodity risk class |
| 4.594,92 | 3.660,93 | 5.368,82 | | vii. Exchange rate risk class |
| 20.399,59 | | | | b. Default risk capital (DRC) charge |
| - | | | | c. Residual risk add-on (RRAO) |
| **238.008,09** | | | | **Market risk capital charge** |
| **-** | | | | **Additional Pillar 1 RWA** |
| **-** | | | | **Credit Valuation Adjustment (CVA)** |
| | | | | Simplified Basic Approach |
| 9,04 | | | | 100% ATMR SACCR |
| **2.975.110,16** | | | | **Total Market Risk RWA** |

## Laporan Publikasi Eksposur Risiko dan Permodalan untuk ATMR Risiko Kredit - Pendekatan Standar

**Publication Report on Risk Exposure and Capital for Credit Risk RWA - Standardized Approach**

### Pengungkapan Perhitungan Risiko Operasional - Bank secara Individu

### Form D1. Laporan Data Kerugian Historis

Disclosure of Operational Risk Calculations - Bank Individually

Form D1. Historical Loss Data Report

Periode Laporan : Desember 2024
Report Period : December 2024

### Bank Secara Individu

Bank Individually

| No | Indikator Bisnis (IB) dan komponen IB | 31 Desember 2024 December 31, 2024 | | | | |
|---|---|---|---|---|---|---|
| | | A | B | C | D | E |
| | | T | T-1 | T-2 | T-3 | T-4 |
| | **Batasan minimum untuk suatu kejadian kerugian operasional (loss event) sebesar Rp300.000.000,00 (tiga ratus juta rupiah) atau lebih** | | | | | |
| 01 | Jumlah kerugian operasional bersih setelah memperhitungkan nilai pemulihan (tanpa pengecualian) | 6.695,03 | 15.428,00 | 435,00 | 5.909,00 | 21.488,00 |
| 02 | Jumlah terjadinya kerugian risiko operasional | 2,00 | 2,00 | 1,00 | 1,00 | 1,00 |
| 03 | Jumlah kerugian risiko operasional yang dikecualikan | - | - | - | - | - |
| 04 | Jumlah terjadinya kerugian risiko operasional yang dikecualikan | - | - | - | - | - |
| 05 | Jumlah kerugian operasional bersih setelah memperhitungkan nilai pemulihan dan kerugian risiko operasional yang dikecualikan | 6.695,03 | 15.428,00 | 435,00 | 5.909,00 | 21.488,00 |
| | **Batasan minimum untuk suatu kejadian kerugian operasional (loss event) sebesar Rp1.500.000.000,00 (satu milyar lima ratus juta rupiah) atau lebih** | | | | | |
| 06 | Jumlah kerugian operasional bersih setelah memperhitungkan nilai pemulihan (tanpa pengecualian) | - | - | - | - | - |
| 07 | Jumlah terjadinya kerugian risiko operasional | - | - | - | - | - |
| 08 | Jumlah kerugian risiko operasional yang dikecualikan | - | - | - | - | - |
| 09 | Jumlah terjadinya kerugian risiko operasional yang dikecualikan | - | - | - | - | - |
| 10 | Jumlah kerugian operasional bersih setelah memperhitungkan nilai pemulihan dan kerugian risiko operasional yang dikecualikan | - | - | - | - | - |
| | **Rincian perhitungan modal untuk risiko operasional** | | | | | |
| 11 | Apakah kerugian digunakan dalam perhitungan FPKI? (Ya/Tidak) | T | | | | |
| 12 | Dalam hal baris 11 diisi "Tidak", apakah tidak digunakannya data kerugian intern tersebut disebabkan ketidaksesuaian standar minimum untuk data kerugian? (Ya/Tidak) | T | | | | |
| 13 | Threshold yg digunakan dalam perhitungan modal untuk risiko operasional (dalam satuan rupiah penuh) | 300.000.000 | | | | |
| 14 | Keterangan Tambahan (jika ada) | Optional | | | | |

dalam jutaan Rupiah | in million Rupiah

| F | G | H | I | J | K | Business Indicator (IB) and IB Components |
|---|---|---|---|---|---|---|
| T-5 | T-6 | T-7 | T-8 | T-9 | Rata-rata 10 Tahun | |
| | | | | | | **Minimum Limit of an Operating Loss Event of Rp300,000,000 (Three Hundred Million Rupiah) or More** |
| - | - | - | - | - | 4.995,50 | Total Net Operating Loss After Calculating the Recovery Value (Without Exception) |
| - | - | - | - | - | 0,70 | Total Occurrence of Operational Risk Loss |
| - | - | - | - | - | - | Total Excluded Operational Risk Loss |
| - | - | - | - | - | - | Total Occurrence of Excluded Operational Risk Loss |
| - | - | - | - | - | 4.995,50 | Total Net Operating Loss After Calculating the Recovery Value and Excluded Operational Risk Losses |
| | | | | | | **Minimum Limit of an Operational Loss Event of Rp1,500,000,000 (One Billion Five Hundred Million Rupiah) or More** |
| - | - | - | - | - | - | Total Net Operating Loss After Calculating the Recovery Value (Without Exception) |
| - | - | - | - | - | - | Total Occurrence of Operational Risk Loss |
| - | - | - | - | - | - | Total Excluded Operational Risk Loss |
| - | - | - | - | - | - | Total Occurrence of Excluded Operational Risk Loss |
| - | - | - | - | - | - | Total Net Operating Loss After Calculating the Recovery Value and Excluded Operational Risk Losses |
| | | | | | | **Details of Capital Calculation for Operational Risks** |
| | | | | | | Are Losses Used in Calculating FPKI? (Yes/No) |
| | | | | | | If Line 11 answer is 'No', Is the Internal Loss Data Not Use Due to a Discrepancy of the Minimum Standards for Loss Data? (Yes/No) |
| | | | | | | Threshold Used in Capital Calculation for Operational Risks (in Full Rupiah Amount) |
| | | | | | | Additional Information (If Any) |

## Laporan Publikasi Eksposur Risiko dan Permodalan untuk ATMR Risiko Kredit - Pendekatan Standar

**Publication Report on Risk Exposure and Capital for Credit Risk RWA - Standardized Approach**

### Pengungkapan Perhitungan Risiko Operasional - Bank secara Individu

### Form D3. Laporan Rincian Indikator Bisnis

**Disclosure of Operational Risk Calculations - Bank Individually**

**Form D3. Report on the Detail of Business Indicators**

Periode Laporan : Desember 2024
Report Period : December 2024

### Bank Secara Individu

**Bank Individually**

| No | Indikator Bisnis (IB) dan komponen IB<br>Business Indicators (IB) and IB Components | 31 Desember 2024<br>December 31, 2024 | | |
|---|---|---|---|---|
| | | a | b | c |
| | | T | T-1 | T-2 |
| 1 | Komponen Bunga, Sewa, dan Dividen (KBSD)<br>Interest, Rent and Dividend Components (KBSD) | 850.240,27 | | |
| 1a | Pendapatan Bunga<br>Interest Income | 3.458.915,00 | 3.234.228,00 | 3.233.204,00 |
| 1b | Beban Bunga<br>Interest Expenses | 795.068,00 | 652.318,00 | 817.832,00 |
| 1c | Aset Produktif<br>Earning Assets | 38.298.239,00 | 37.082.203,00 | 37.984.927,00 |
| 1d | Pendapatan Dividen<br>Dividend Income | - | - | - |
| 2 | Komponen Jasa (KJ)<br>Services Components | 3.486.098,00 | | |
| 2a | Pendapatan Jasa dan Komisi<br>Fees and Commission Income | 449.045,00 | 417.193,00 | 445.369,00 |
| 2b | Beban Jasa dan Komisi<br>Fees and Commission Expenses | 2.500.251,00 | 2.018.587,00 | 2.322.714,00 |
| 2c | Pendapatan operasional lainnya<br>Other Operating Income | 398.925,00 | 405.879,00 | 514.043,00 |
| 2d | Beban operasional lainnya<br>Other Operating Expenses | 1.250.472,00 | 1.193.243,00 | 1.173.027,00 |
| 3 | Komponen Keuangan (KK)<br>Financial Components | 145.672,33 | - | - |
| 3a | Laba Rugi Bersih Trading Book<br>Net Profit Loss Trading Book | 104.115,00 | 67.338,00 | 62.067,00 |
| 3b | Laba Rugi Bersih Banking Book<br>Net Profit Loss Banking Book | (7.724,00) | 17.918,00 | 177.855,00 |
| 4 | IB | 4.482.010,60 | | |
| 5 | Komponen Indikator Bisnis (KIB)<br>Business Indicator Components | 537.841,27 | | |
| Pengungkapan IB<br>IB Disclosure | | | | |
| 6a | IB total termasuk aktivitas yang didivestasi<br>Total IB including Divested Activities | - | | |
| 6b | Pengurangan IB dikarenakan pengecualian atas aktivitas yang didivestasi<br>IB Reduction due to Exclusion of Divested Activities | 4.482.010,60 | | |
| 7 | Keterangan Tambahan<br>Additional information | Penyajian informasi keuangan telah diaudit oleh Kantor Akuntan Publik Mirawati Sensi Idris untuk periode tahun 2023, sebagaimana laporannya tertanggal 28 Maret 2024 dengan Opini Audit Wajar Tanpa Modifikasian.<br>The presentation of financial information has been audited by Mirawati Sensi Idris Public Accountant firm for the period of 2023, as reported on March 28, 2024 with an Unmodified Audit Opinion. | | |

## Laporan Publikasi Eksposur Risiko dan Permodalan untuk ATMR Risiko Kredit - Pendekatan Standar

**Publication Report on Risk Exposure and Capital for Credit Risk RWA - Standardized Approach**

### Pengungkapan Perhitungan Risiko Operasional - Bank secara Individu

### Form D5. Laporan Perhitungan ATMR Risiko Operasional dengan menggunakan pendekatan standar

**Disclosure of Operational Risk Calculations - Bank Individually**

**Form D5. Operational Risk RWA Calculation Report using a standardized approach**

Periode Laporan : Desember 2024
Report Period : December 2024

### Bank Secara Individu

**Bank Individually**

| No | Rincian | 31 Desember 2024<br>December 31, 2024<br>Individual | Description |
|---|---|---|---|
| | | a | |
| 01 | Komponen Indikator Bisnis (KIB) | 537.841 | Business Indicator Components (KIB) |
| 02 | Faktor Pengali Kerugian Internal (FPKI) | 1 | Internal Loss Multiplier Factor (FPKI) |
| 03 | Modal Minimum Risiko Operasional (MMRO) | 537.841 | Operational Risk Minimum Capital (MMRO) |
| 04 | ATMR untuk Risiko Operasional | 6.723.016 | RWA for Operational Risk |

### Konvensional

**Conventional**

| No | Rincian | 31 Desember 2024<br>December 31, 2024<br>Individual | Description |
|---|---|---|---|
| | | a | |
| 01 | Komponen Indikator Bisnis (KIB) | 537.841 | Business Indicator Components (KIB) |
| 02 | Faktor Pengali Kerugian Internal (FPKI) | 1 | Internal Loss Multiplier Factor (FPKI) |
| 03 | Modal Minimum Risiko Operasional (MMRO) | 537.841 | Operational Risk Minimum Capital (MMRO) |
| 04 | ATMR untuk Risiko Operasional | 6.723.016 | RWA for Operational Risk |



# LAPORAN KEBERLANJUTAN

## Sustainability Report



.07

# TENTANG LAPORAN KEBERLANJUTAN
## About Sustainability Report



Laporan Keberlanjutan ini disusun sebagai wujud komitmen Bank Sinarmas dalam mendukung pembangunan berkelanjutan serta memenuhi prinsip tata kelola yang transparan dan bertanggung jawab. Melalui laporan ini, Bank Sinarmas ingin menyampaikan informasi yang akurat dan komprehensif mengenai berbagai inisiatif keberlanjutan yang telah, sedang, dan akan dijalankan dalam aspek lingkungan, sosial, serta tata kelola (ESG).

Laporan ini tidak hanya bertujuan untuk menunjukkan kinerja keberlanjutan Bank Sinarmas, tetapi juga untuk memperkuat dialog dengan para pemangku kepentingan terkait peran serta kontribusi bank dalam menciptakan dampak positif bagi masyarakat dan lingkungan. Penyusunan laporan ini dilakukan sesuai dengan peraturan yang dikeluarkan Otoritas Jasa Keuangan (OJK), sehingga dapat memberikan gambaran yang jelas tentang pencapaian dan tantangan yang dihadapi dalam perjalanan menuju keuangan yang berkelanjutan.

This Sustainability Report is prepared as a manifestation of Bank Sinarmas' commitment to supporting sustainable development and fulfilling the principles of transparent and responsible governance. Through this report, Bank Sinarmas would like to convey accurate and comprehensive information on various sustainability initiatives that have been, are being, and will be implemented in environmental, social, and governance (ESG) aspects.

This report not only aims to demonstrate Bank Sinarmas' sustainability performance, but also to strengthen the dialog with stakeholders regarding the Bank's role and contribution in creating a positive impact on society and the environment. The preparation of this report is conducted in accordance with the regulations issued by the Financial Services Authority (OJK) so as to provide a clear picture of the achievements and challenges faced in the journey toward sustainable finance.

| | |
|---|---|
| **Pedoman dan Standar**<br>**Guidelines and Standard** | • Peraturan Otoritas Jasa Keuangan No.51/POJK.03/2017 tentang Penerapan Keuangan Berkelanjutan bagi Lembaga Jasa Keuangan, Emiten, dan Perusahaan Publik<br>• Format laporan mengacu pada Surat Edaran Otoritas Jasa Keuangan No.16/SOJK.04/2021 tentang Bentuk dan Isi Laporan Tahunan Emiten atau Perusahaan Publik<br>• Financial Services Authority Regulation No.51/POJK.03/2017 on the Implementation of Sustainable Finance for Financial Services Institutions, Issuers, and Public Companies<br>• The format of the report refers to the Circular Letter of the Financial Services Authority No.16/SOJK.04/2021 regarding the Form and Content of the Annual Report of Issuers or Public Companies |
| Siklus dan Periode Pelaporan **[GRI 2-3]**<br>Reporting Cycle and Period | • Diterbitkan setiap tahun<br>• Periode pelaporan 1 Januari 2024 sampai 31 Desember 2024<br>• Laporan sebelumnya diterbitkan pada bulan April 2024<br>• Issued annually<br>• Reporting period from January 1, 2024 to December 31, 2024<br>• Previous report published in April 2024 |
| Cakupan dan Batasan **[GRI 2-2]**<br>Scope and Limitation | • Informasi dan data kinerja Laporan Keberlanjutan mencakup kinerja keuangan konsolidasi dengan entitas anak<br>• Informasi dan data kinerja sosial dan lingkungan hanya mencakup PT Bank Sinarmas Tbk, tidak termasuk entitas anak<br>• Information and data of Sustainability Report performance includes consolidated financial performance with subsidiaries<br>• Information and data on social and environmental performance only covers PT Bank Sinarmas Tbk, excluding subsidiaries |
| Penyajian Kembali Informasi **[GRI 2-4]**<br>Information Restatement | Tidak terdapat penyajian kembali informasi<br>No restatement of information |
| Tanggapan Umpan Balik Laporan Sebelumnya **[OJK G.3]**<br>Feedback on Previous Reports | Tidak terdapat umpan balik dari laporan sebelumnya<br>No feedback from previous reports |
| Verifikasi Pihak Eksternal **[OJK G.1][GRI 2-5]**<br>External Party Verification | Tidak melakukan verifikasi eksternal<br>No external verification |
| Titik Kontak Pelaporan **[GRI 2-3]**<br>Reporting Contact Point | Sekretaris Perusahaan<br>Sinar Mas Land Plaza Tower I, Lt.1 & 2<br>Jl. M.H. Thamrin Kav. 51<br>Jakarta 10350<br>T: (+62 21) 3199 0101<br>F: (+62 21) 3199 0401 |

## TOPIK MATERIAL [GRI 3-1][GRI 3-2]

Bank Sinarmas telah menentukan topik-topik material dalam laporan ini dengan melibatkan kelompok pemangku kepentingan. Proses pemetaan dilakukan melalui diskusi internal antar unit operasional Bank. Langkah ini dilakukan karena setiap pemangku kepentingan memiliki sudut pandang yang berbeda terkait pengelolaan isu-isu penting yang relevan dengan aktivitas bisnis Bank, termasuk isu-isu keuangan berkelanjutan.

Dari pelibatan pemangku kepentingan tersebut, Bank kemudian menentukan prioritas topik-topik material yang dianggap memiliki dampak signifikan terhadap perusahaan maupun pemangku kepentingan. Berikut adalah daftar topik material pada laporan ini:

## MATERIAL TOPIC [GRI 3-1][GRI 3-2]

Bank Sinarmas determined the material topics in this report by involving stakeholder groups. The mapping process is conducted through internal discussions among the Bank's operational units. This step was taken because each stakeholder has a different perspective on how to manage important issues related to the Bank's business activities, including sustainable finance.

From the stakeholder engagement, the Bank then determines the priority of material topics that are considered to have a significant impact on the company and stakeholders. The following is a list of material topics in this report:

| **Topik**<br>Topic | **Alasan Bersifat Material**<br>Material Reasons |
|---|---|
| **Aspek Ekonomi**<br>**Economic Aspect** | |
| Kinerja Ekonomi<br>Economic Performance | Peningkatan pada kinerja ekonomi akan menopang keberlanjutan usaha yang dijalankan serta dapat berkontribusi dalam meningkatkan perekonomian para pemangku kepentingan, daerah, maupun nasional.<br>Improvements in economic performance will support the business sustainability and contribute to enhancing the economies of stakeholders, regions, and the nation. |
| Digitalisasi Produk dan Layanan<br>Digitized Products and Services | Layanan berbasis digital akan memberikan kemudahan bagi para nasabah untuk melakukan transaksi.<br>Digital-based services will provide convenience for customers to conduct transactions. |
| Anti-fraud, Anti-korupsi, dan APU-PPT<br>Anti-Fraud, Anti-Corruption, and AML-CTF | Aktivitas operasional yang sehat dan terhindar dari tindak kecurangan atau menyimpang akan menumbuhkan rasa kepercayaan para Pemegang Saham dan pemangku kepentingan lainnya.<br>Healthy operational activities that are free from fraudulent or deviant actions will foster trust among shareholders and other stakeholders. |
| **Aspek Sosial**<br>**Social Aspect** | |
| Privasi Data Nasabah<br>Confidentiality of Customer Data | Kerahasiaan data nasabah perlu dijaga dalam rangka memberikan rasa aman dan meningkatkan kepercayaan nasabah terhadap Bank.<br>Customer data confidentiality needs to be maintained in order to provide a sense of security and enhance customer trust in the Bank. |
| Pengembangan Kompetensi Karyawan<br>Employee Competency Development | Pengembangan kompetensi diselenggarakan dalam rangka membentuk karyawan yang kompeten serta menunjang pelaksanaan tugas dan tanggung jawab, khususnya di bidang keuangan berkelanjutan.<br>Competency development is conducted to create competent employees and support the implementation of duties and responsibilities, especially in sustainable finance area. |
| Literasi dan Inklusi Keuangan Serta Pemberdayaan Masyarakat<br>Financial Literacy and Inclusion and Community Empowerment | Memberikan pemahaman bagi masyarakat terkait manfaat produk dan jasa perbankan berperan penting dalam meningkatkan kesejahteraan ekonomi dan sosial.<br>Providing understanding to the public regarding the benefits of banking products and services that play a crucial role in improving economic and social welfare. |
| **Aspek Lingkungan**<br>**Social Environmental** | |
| Penggunaan Energi<br>Energy Usage | Pelaksanaan kegiatan usaha yang dijalankan menggunakan energi yang cukup besar. Maka dari itu Bank berupaya untuk melakukan pengendalian dalam mengefisiensikan penggunaan energi.<br>The business activities conducted use a considerable amount of energy. Therefore, the Bank strives to control and efficiently use energy |
| Penggunaan Kertas<br>Paper Usage | Penggunaan kertas berlebih dalam aktivitas operasional Bank secara tidak langsung dapat menyebabkan deforestasi dan berdampak pada ekosistem.<br>Excessive paper usage in the Bank's operational activities can indirectly lead to deforestation and impact ecosystems. |

# STRATEGI KEBERLANJUTAN [OJK A.1][GRI 2-23] [GRI 2-24]
## Sustainability Strategy






Sebagai bagian dari komitmennya terhadap pembangunan berkelanjutan, PT Bank Sinarmas Tbk terus mengintegrasikan prinsip-prinsip keberlanjutan dalam setiap aspek strategi bisnisnya. Bank berupaya mewujudkan pembangunan berkelanjutan yang mampu menjaga stabilitas ekonomi serta bersifat inklusif dan mengedepankan keselarasan antara aspek ekonomi, sosial, dan lingkungan hidup. Melalui berbagai inisiatif dan kebijakan yang mendukung aspek ekonomi, sosial, dan lingkungan, Bank berupaya mewujudkan visi untuk menjadi lembaga keuangan yang berkontribusi positif dalam menciptakan masa depan yang lebih baik dan berkelanjutan.

As part of its commitment to sustainable development, PT Bank Sinarmas Tbk incorporates sustainability principles into all aspects of its business strategy. The Bank strives for sustainable development in order to maintain economic stability while also being inclusive and prioritizing economic, social, and environmental harmony. Through various initiatives and policies that support economic, social, and environmental aspects, the Bank strives to realize its vision of becoming a financial institution that positively contributes to the creation of a better and more sustainable future.

## Visi dan Misi Keuangan Berkelanjutan [OJK C.1]

## Vision and Mission Sustainable Finance

### VISI Vision

Menjadi Bank yang terkemuka yang senantiasa menjaga keseimbangan aspek ekonomi, sosial dan lingkungan dalam menjalankan aktivitas operasionalnya.

To become a leading bank that always maintains a balance of economic, social and environmental aspects in carrying out its operational activities.



### MISI Mission

Meningkatkan efisiensi penggunaan energi dan sumber daya dalam operasional usaha.

Increase the efficiency of energy and resource utilization in business operations.

Meningkatkan peranan tanggung jawab sosial dan lingkungan (TJSL) dalam rangka meningkatkan kesejahteraan masyarakat.

Increase the role of social and environmental responsibility (CSER) to improve community welfare.

Mengembangkan produk dan/atau jasa keuangan yang menerapkan prinsip keuangan berkelanjutan.

Develop financial products and/or services that apply sustainable finance principles.

Mengelola risiko sosial dan lingkungan hidup yang lebih baik dengan menerapkan prinsip keuangan berkelanjutan.

Manage social and environmental risks better by applying sustainable finance principles.

## KEBIJAKAN KEUANGAN BERKELANJUTAN

Bank Sinarmas menyadari pentingnya memperhatikan proyek yang dibiayai agar senantiasa sesuai dengan prinsip-prinsip keuangan berkelanjutan. Dalam realisasinya, Bank menetapkan persyaratan khusus berupa analisis mengenai dampak lingkungan (AMDAL) bagi debitur dengan risiko lingkungan tinggi, melalui program Kredit Kegiatan Usaha Berkelanjutan (KKUB).

Selain itu, Bank juga menetapkan kebijakan terkait sertifikasi keberlanjutan bagi debitur di sektor usaha tertentu, kebijakan pemberian kredit usaha mikro, kecil, dan menengah (UMKM) atau kredit usaha rakyat (KUR), serta kebijakan pelaksanaan tanggung jawab sosial dan lingkungan (TJSL). Bank menetapkan kriteria penilaian dan identifikasi terhadap prospek usaha, pengelolaan risiko lingkungan atas usaha yang dilakukan oleh debitur, termasuk pengelolaan limbah. Dengan demikian, Bank senantiasa dapat memastikan bahwa debitur tidak berada pada segmen atau kegiatan usaha yang dilarang oleh pemerintah atau Bank.

## SUSTAINABLE FINANCE POLICY

Bank Sinarmas acknowledges that it is important for the Bank to ensure that financing projects always comply with sustainable finance principles. In its realization, the Bank establishes specific requirements such as Environmental Impact Assessments (AMDAL) for debtors with high environmental risk, through the Sustainable Business Activity Financing (KKUB) program.

Furthermore, the Bank also implements policies related to sustainability certification for debtors in certain business sectors, policies for providing Micro, Small, and Medium Enterprise (MSME) loans or People's Business Credit (KUR), as well as policies for implementing social and environmental responsibility (CSER). Moreover, the Bank establishes criteria for assessing and identifying business prospects, environmental risk management for activities carried out by debtors, including waste management. Thus, the Bank can always ensure that debtors do not engage in segments or activities prohibited by the government or the Bank.

Bank Sinarmas berkontribusi dalam mendukung penerapan pembangunan berkelanjutan di Indonesia dengan menjunjung tinggi prinsip-prinsip keuangan berkelanjutan. Hal ini dapat diuraikan sebagai berikut:

1. Sektor Perkebunan Sawit
   Penerapan ketentuan tentang sertifikasi sawit berkelanjutan Indonesia atau *Indonesian Sustainable Palm Oil* (ISPO) dan/atau *Indonesian Sustainable Palm Oil* (RSPO) sebagai kewajiban kepada debitur yang bergerak di bidang perkebunan sawit. Debitur diharapkan lebih memahami dan menyadari pentingnya keselarasan aspek sosial dan lingkungan dalam usahanya untuk mendukung implementasi pembangunan berkelanjutan.
2. Kredit Usaha Rakyat
   Bank Sinarmas telah dan akan terus berkontribusi dalam penyaluran Kredit Usaha Rakyat (KUR) pada sektor produksi seperti perikanan, peternakan, dan pertanian. Dengan begitu, Bank dapat mendorong pembangunan berkelanjutan kepada masyarakat dengan tidak hanya memberikan pembiayaan, namun juga memberikan pendampingan dan pembelajaran atas produk dan/atau jasa keuangan. Hal ini dilakukan guna memberikan kontribusi dalam pengelolaan dan memajukan usaha masyarakat Indonesia.
3. Pembiayaan Digital
   Bank Sinarmas menyadari perkembangan teknologi informasi (TI) dapat meningkatkan peran dan kontribusi dalam literasi dan inklusi keuangan di tanah air. Maka dari itu, Bank membidik peluang perkembangan ekonomi digital di Indonesia dengan mengembangkan layanan pemberian kredit secara *online* (*digital loan*) untuk kebutuhan penyaluran kredit mikro maupun kredit konsumer. Penyaluran kredit secara digital terbukti mendukung upaya pelestarian alam, seperti yang terlihat pada pengurangan penggunaan kertas (*paperless)* dalam operasional usaha.
4. Pembukaan Rekening Pendaftaran
   Melalui inovasi mekanisme, Bank bertekad untuk memudahkan nasabah untuk memberikan kenyamanan pada proses digitalisasi pembukaan rekening; dan
5. Proses Kredit *Supply Chain Financing*
   Bank berupaya meningkatkan efisiensi dan efektivitas yang menunjang perkembangan bisnis debitur melalui pengembangan sistem pencairan kredit (*paperless*) dan terdigitalisasi pada Proses Kredit *Supply Chain Financing*.

Bank memetakan portofolio penyaluran kredit menjadi 12 kategori sesuai Rencana Aksi Keuangan Berkelanjutan melalui program pembiayaan KKUB. Selain itu, Bank secara khusus juga memberikan kredit pada segmen usaha mikro kecil dan menengah (UMKM) dengan menciptakan produk *Virtual Credit Card*. Produk ini terbukti efektif mendukung pengurangan sumber daya alam dan mengurangi penggunaan kertas.

Bank Sinarmas contributes to supporting the implementation of sustainable development in Indonesia by upholding the principles of sustainable finance. This can be outlined as follows:

1. Palm Oil Plantation Sector
   The implementation of provisions regarding Indonesian Sustainable Palm Oil (ISPO) certification and/or Roundtable on Sustainable Palm Oil (RSPO) certification as obligations for debtors engaging in the palm oil plantation sector. Debtors are expected to have a better understanding and awareness of the importance of social and environmental aspects in their businesses to support the implementation of sustainable development.
2. People's Business Credit
   Bank Sinarmas has and will continue to contribute to the distribution of People's Business Credit (KUR) in production sectors such as fisheries, livestock, and agriculture. That way, the Bank can encourage sustainable development in the community by not only offering financing, but also providing guidance and education on financial products and/or services to contribute to the management and advancement of Indonesian community businesses.
3. Digital Financing
   Bank Sinarmas realizes that the development of information technology (IT) enhances its role and contribution to financial literacy and inclusion in the country. Therefore, the Bank aims to explore the opportunities of the digital economy development in Indonesia by developing online credit services (digital loans) for micro credit and consumer credit needs. Digital credit distribution has been proven to support environmental conservation efforts, as seen in the reduction of paper usage (paperless) in business operations.
4. Registration for Opening an Account
   Through mechanism innovation, the Bank is determined to facilitate customers to provide convenience in the digital account opening process; and
5. Supply Chain Financing Credit Process
   The Bank seeks to enhance efficiency and effectiveness that support the business development of debtors through the development of a paperless and digitalized credit disbursement system in the Supply Chain Financing Credit Process.

The Bank maps its credit distribution portfolio into 12 categories according to the Sustainable Finance Action Plan through the Sustainable Business Activity Financing (KKUB) program. In addition, the Bank specifically provides credit to the micro, small, and medium enterprise (MSME) segments by creating a Virtual Credit Card product. This product has proven effective in supporting natural resource reduction and decreasing paper usage.

Pada struktur pengelola kredit, Bank telah memisahkan fungsi pemasaran dan analisa kredit dalam penerimaan permohonan kredit. Maka dari itu, Bank berupaya menjaga kualitas kredit berdasarkan prinsip kehati-hatian. Pemberian kredit wajib mendapatkan persetujuan dari Komite Kredit yang memiliki integritas, profesionalisme, serta berkompeten di bidang perkreditan.

In the credit management structure, the Bank has separated the marketing and credit analysis functions in accepting credit applications. Therefore, the Bank strives to maintain credit quality based on the principle of prudence. Credit approval also requires approval from the Credit Committee, which possesses integrity, professionalism, and competence in credit management.

## PELIBATAN PEMANGKU KEPENTINGAN [GRI 2-29]

Pelibatan pemangku kepentingan merupakan aspek kunci dalam penerapan strategi keberlanjutan Bank Sinarmas. Bank memahami bahwa keberhasilan jangka panjang sangat bergantung pada hubungan yang kuat dan kolaboratif dengan berbagai pemangku kepentingan, termasuk karyawan, nasabah, investor, regulator, komunitas, serta mitra bisnis. Oleh karena itu, Bank Sinarmas secara proaktif menjalin komunikasi dan kolaborasi yang transparan serta responsif untuk memastikan bahwa kepentingan dan harapan pemangku kepentingan dapat dipahami dan dipenuhi.

## STAKEHOLDERS ENGAGEMENT [GRI 2-29]

Stakeholder engagement is a key aspect in implementing Bank Sinarmas' sustainability strategy. The Bank understands that long-term success is highly dependent on strong and collaborative relationships with various stakeholders, including employees, customers, investors, regulators, communities, and business partners. Therefore, Bank Sinarmas proactively establishes transparent and responsive communication and collaboration to ensure that stakeholder interests and expectations can be understood and met.

Dalam menjalin hubungan dengan pemangku kepentingan, Bank telah melakukan pemetaan kelompok pemangku kepentingan berdasarkan kedekatan dan pengaruh mereka terhadap Bank. Proses pemetaan dilakukan melalui diskusi internal antar unit operasional Bank. Langkah ini dilakukan karena setiap pemangku kepentingan memiliki sudut pandang yang berbeda terkait pengelolaan isu-isu penting yang relevan dengan aktivitas bisnis Bank, termasuk isu-isu keuangan berkelanjutan. Isu-isu penting yang muncul dari pemangku kepentingan menjadi dasar dalam menentukan fokus penyajian laporan ini.

In establishing relationships with stakeholders, the Bank has mapped stakeholders' groups based on their proximity and influence on the Bank through internal discussions among the Bank's operational units. This step is taken because each stakeholder has a different perspective regarding the management of important issues relevant to the Bank's business activities, including sustainable finance issues. Important issues arising from stakeholders serve as the basis for determining the focus of this report presentation.

### Daftar Kelompok Pemangku Kepentingan dan Metode Pelibatan
**List of Stakeholder Groups and Engagement Methods**

| **Kelompok Pemangku Kepentingan** Stakeholders Group | **Kebutuhan Pemangku Kepentingan** Stakeholders Needs | **Respon Terhadap Kebutuhan Pemangku Kepentingan** Response to Stakeholders Needs | **Metode Pelibatan** Engagement Methods | **Frekuensi Pelaksanaan** Implementation Frequency |
|---|---|---|---|---|
| Pemegang Saham | • Kinerja keuangan dan non-keuangan<br>• Kinerja lingkungan, sosial, dan tata kelola<br>• Pertumbuhan nilai saham<br>• Penerapan prinsip keuangan berkelanjutan<br>• Keberlangsungan usaha Bank | • Menyusun Rencana Bisnis Bank dan RAKB<br>• Menjaga kinerja Bank tetap optimal dan sesuai target, dengan memperhatikan tiga pilar keberlanjutan<br>• Menerapkan tata kelola perusahaan yang baik (GCG) secara optimal<br>• Mengelola manajemen risiko dan menjaga reputasi Bank<br>• Menjaga keterbukaan informasi | • Pelaksanaan Rapat Umum Pemegang Saham (RUPS) dan Paparan Publik<br>• Penyampaian Laporan Tahunan dan Laporan Keberlanjutan<br>• Penyediaan sarana akses informasi | Setiap tahun, sesuai waktu yang ditentukan, atau sesuai kebutuhan |

| **Kelompok Pemangku Kepentingan** Stakeholders Group | **Kebutuhan Pemangku Kepentingan** Stakeholders Needs | **Respon Terhadap Kebutuhan Pemangku Kepentingan** Response to Stakeholders Needs | **Metode Pelibatan** Engagement Methods | **Frekuensi Pelaksanaan** Implementation Frequency |
|---|---|---|---|---|
| Shareholders | • Financial and non-financial performance<br>• Environmental, social and governance performance<br>• Stock value growth<br>• Implementation of sustainable finance principles<br>• The Bank's business sustainability | • Developing the Bank's Business Plan and Sustainable Finance Action Plan (RAKB)<br>• Maintaining the Bank's performance to remain optimal and in line with targets, while paying attention to the three pillars of sustainability<br>• Implementing good corporate governance (GCG) optimally<br>• Managing risk management and maintaining the Bank's reputation<br>• Maintaining information transparency | • Holding the General Meeting of Shareholders (GMS) and Public Expose<br>• Submission of Annual Report and Sustainability Report<br>• Provision of information access facilities | Annually, as scheduled, or as needed |
| Pemerintah | • Kepatuhan regulasi dan pelaksanaan prinsip kehati-hatian serta tata kelola perusahaan<br>• Analisis risiko sosial dan lingkungan dalam pembiayaan<br>• Penyampaian beragam laporan yang wajib<br>• Pemenuhan kewajiban perpajakan<br>• Komitmen dalam mencegah anti-fraud, anti-korupsi, serta anti-pencucian uang dan pencegahan pendanaan terorisme (APUPPT) | • Memastikan pemenuhan seluruh regulasi yang berlaku bagi Bank<br>• Meningkatkan kualitas penerapan GCG, termasuk sistem pengendalian internal dan sistem manajemen risiko<br>• Menyusun RAKB<br>• Menyampaikan setiap laporan dengan tepat waktu<br>• Membayar pajak dan penerimaan negara bukan pajak (PNBP)<br>• Menyusun kebijakan untuk mencegah praktik fraud, korupsi, dan APU-PPT | • Penyampaian Laporan Tahunan dan Keberlanjutan, Laporan Keuangan, Laporan GCG, dan laporan lainnya dengan tepat waktu<br>• Pembayaran dan pelaporan pajak serta PNBP<br>• Penyusunan kebijakan anti-fraud, anti-korupsi, dan APUPPT<br>• Pertemuan-pertemuan lainnya | Setiap tahun, sesuai waktu yang ditentukan, atau sesuai kebutuhan. |
| Government | • Compliance with regulations and implementation of prudential principles as well as corporate governance<br>• Analysis of social and environmental risks in financing<br>• Submission of various mandatory reports<br>• Fulfillment of tax obligations<br>• Commitment to preventing fraud, corruption, as well as money laundering and countering terrorism financing (AML-CFT) | • Ensuring compliance with all applicable regulations for the Bank<br>• Improving the quality of GCG implementation, including internal control and risk management systems<br>• Formulating the Sustainable Finance Action Plan (RAKB)<br>• Timely submission of every report<br>• Paying taxes and non-tax state revenues (PNBP)<br>• Formulating policies to prevent fraudulent, corruption, and AML-CFT practices | • Timely submission of Annual and Sustainability Reports, Financial Statements, GCG Reports, and other reports<br>• Payment and reporting of taxes and non-tax state revenues (PNBP)<br>• Formulation of anti-fraud, anti-corruption, and AML-CFT policies<br>• Other meetings | Annually, as scheduled, or as needed |
| Karyawan | • Hubungan Industrial yang baik;<br>• Hak dan kewajiban karyawan;<br>• Kesempatan setara dalam pengembangan karier, kompetensi, pelatihan dan pendidikan; serta Keselamatan dan Kesehatan Kerja (K3). | • Menyediakan sistem pengaduan karyawan; Memenuhi hak dan kewajiban karyawan;<br>• Menyediakan pelatihan dan pendidikan untuk semua karyawan;<br>• Membangun sistem pengelolaan talenta, termasuk evaluasi kinerja yang adil, kenaikan jabatan, promosi, dan mutasi; serta<br>• Memastikan lingkungan kerja yang aman. | • Penyelenggaraan *gathering* karyawan dan *focus group discussion* (FGD);<br>• Penyediaan *whistleblowing system* (WBS) untuk melaporkan pelanggaran hak-hak karyawan atau praktik ketenagakerjaan di lingkungan Bank;<br>• Pelaksanaan berbagai program pendidikan/ pelatihan, serta promosi atau mutasi;<br>• Penyediaan sarana dan prasarana (K3) yang memadai; serta<br>• Pelaksanaan survei kepuasan karyawan. | Setiap tahun atau sesuai rencana pelaksanaan program. |

| **Kelompok Pemangku Kepentingan** Stakeholders Group | **Kebutuhan Pemangku Kepentingan** Stakeholders Needs | **Respon Terhadap Kebutuhan Pemangku Kepentingan** Response to Stakeholders Needs | **Metode Pelibatan** Engagement Methods | **Frekuensi Pelaksanaan** Implementation Frequency |
|---|---|---|---|---|
| Employee | • Good Industrial Relations;<br>• Employee rights and obligations;<br>• Equal opportunities in career development, competence enhancement, training and education; and<br>• Occupational Health and Safety (OHS). | • Providing an employee complaint system;<br>• Fulfilling employee rights and obligations;<br>• Providing training and education for all employees;<br>• Developing a talent management system, including fair performance evaluations, promotions, and transfer; and<br>• Ensuring a safe working environment. | • Organizing employee gatherings and focus group discussions (FGD);<br>• Providing a whistleblowing system (WBS) to report violations of employee rights or employment practices within the Bank;<br>• Implementing various education/training programs, as well as promotions or transfers;<br>• Providing adequate facilities and infrastructure (OHS); and<br>• Conducting employee satisfaction surveys. | Annually or according to the program implementation plan. |
| Nasabah | • Tanggapan dan tindak lanjut atas umpan balik, masukan, keluhan, dan permintaan informasi;<br>• Pengembangan produk perbankan;<br>• Kesehatan dan keselamatan dalam operasional bank;<br>• Kinerja keberlanjutan;<br>• Perlindungan privasi nasabah dan keamanan data;<br>• Pendidikan dan pelatihan;<br>• Layanan perbankan yang prima; serta<br>• Literasi dan inklusi keuangan. | • Menindaklanjuti umpan balik, masukan, keluhan, dan pengaduan yang diterima;<br>• Menggali kebutuhan nasabah serta melakukan inovasi produk dan layanan;<br>• Meningkatkan kualitas layanan, termasuk dalam hal teknologi informasi;<br>• Memberikan perlindungan simpanan dan kerahasiaan data nasabah;<br>• Menyelenggarakan program literasi dan inklusi keuangan; serta<br>• Menyediakan informasi yang lengkap dan transparan terkait produk dan jasa Bank melalui situs web atau brosur yang tersedia di setiap kantor cabang. | • Pelaksanaan *customer gathering*<br>• Penyediaan layanan *call center* Bank di 1500153;<br>• Pelaksanaan program literasi dan inklusi keuangan; serta<br>• Pelaksanaan survei kepuasan nasabah. | Sepanjang tahun atau sesuai kebutuhan. |
| Customers | • Response and follow-up on feedback, input, complaints, and information requests;<br>• Development of banking products;<br>• The Bank's health and safety operations;<br>• Sustainability performance;<br>• Protection of customer privacy and data security;<br>• Education and training;<br>• Excellent banking services; and<br>• Financial literacy and inclusion. | • Following up on feedback, input, complaints, and grievances received;<br>• Identifying customer needs and innovating products and services;<br>• Improving service quality, including in terms of information technology;<br>• Providing protection of customer deposits and data confidentiality;<br>• Organizing financial literacy and inclusion programs; and<br>• Providing comprehensive and transparent information regarding Bank products and services through the website or brochures available at each branch office. | • Organizing customer gatherings;<br>• Provision of Bank call center services at 1500153;<br>• Organizing financial literacy and inclusion programs; and<br>• Conducting customer satisfaction surveys. | Throughout the year or as needed. |
| Mitra Bisnis atau Rekanan | • Pengadaan barang dan/ atau jasa yang adil dan transparan;<br>• Kontrak kerja yang saling menguntungkan;<br>• Pembayaran tepat waktu; serta<br>• Hubungan kerja yang baik. | • Memberikan informasi yang dibutuhkan untuk memperlancar proses pengadaan dan pekerjaan;<br>• Sosialisasi dan edukasi kebijakan dan Kode Etik;<br>• Membangun komunikasi bisnis yang sistematis; serta<br>• Melakukan pembayaran tepat waktu. | • Perumusan kontrak kerja sama; serta<br>• Pelaksanaan pertemuan berkala. | Sepanjang tahun atau sesuai kebutuhan |

| Kelompok Pemangku Kepentingan<br>Stakeholders Group | Kebutuhan Pemangku Kepentingan<br>Stakeholders Needs | Respon Terhadap Kebutuhan Pemangku Kepentingan<br>Response to Stakeholders Needs | Metode Pelibatan<br>Engagement Methods | Frekuensi Pelaksanaan<br>Implementation Frequency |
|---|---|---|---|---|
| Business Partners or Associates | • Fair and transparent provision of goods and/or services;<br>• Mutually beneficial employment contracts;<br>• Timely payments; and<br>• Good working relationships. | • Providing necessary information to facilitate procurement and work processes;<br>• Dissemination and education of policies and Code of Ethics;<br>• Developing systematic business communication; and<br>• Making timely payments. | • Formulation of cooperation contracts; and<br>• Organizing regular meetings. | Throughout the year or as needed. |
| Media | Informasi dan data Bank, seperti kinerja finansial, layanan dan produk, serta aksi korporasi. | Menyediakan informasi yang relevan dan transparan melalui situs web Bank dan Bursa Efek Indonesia. | • Pelaksanaan Paparan Publik dan *press release/ conference;* serta<br>• Publikasi media dan Laporan Bank. | Setiap tahun, sesuai waktu yang ditentukan, atau sesuai kebutuhan. |
| Media | Bank information and data, such as financial performance, services and products, as well as corporate actions. | Providing relevant and transparent information through the Bank's and Indonesia Stock Exchange's websites. | • Holding Public Expose and press releases/conferences; and<br>• Media publications and Bank Reports. | Annually, as scheduled, or as needed. |
| Masyarakat | • Pemahaman mengenai keuangan berkelanjutan; serta<br>• Peningkatan kesejahteraan masyarakat. | • Memberikan pemahaman dan perannya dalam penerapan keuangan berkelanjutan Bank;<br>• Rekrutmen tenaga kerja lokal; serta<br>• Melaksanakan berbagai kegiatan TJSL, termasuk literasi dan inklusi keuangan. | • Pelaksanaan program TJSL; serta<br>• Penyediaan WBS untuk menyampaikan pengaduan masyarakat. | Sesuai rencana pelaksanaan program atau sesuai kebutuhan. |
| Community | • Understanding about sustainable finance; and<br>• Improving community welfare. | • Providing understanding and the role of sustainable finance implementation at the Bank;<br>• Recruitment of local employees; and<br>• Implementing various CESR activities, including financial literacy and inclusion. | • Organizing CSER programs; and<br>• Providing WBS for community to convey their complaints. | As scheduled, or as needed. |



## PENERAPAN KEUANGAN BERKELANJUTAN

Bank Sinarmas memiliki perhatian besar terhadap pembangunan keuangan berkelanjutan. Bank menyadari pentingnya isu pengelolaan keuangan berkelanjutan dengan mengedepankan penerapan prinsip *triple bottom line* dalam kegiatan usaha Bank, *people*, *profit* dan *planet*, di mana aspek ekonomi, sosial dan lingkungan hidup merupakan 3 (tiga) hal yang seharusnya berjalan dengan selaras. Arah dari pengaturan penerapan Keuangan Berkelanjutan adalah mendorong penciptaan Keuangan Berkelanjutan di sektor jasa keuangan yang mendukung keberlanjutan ekonomi, sosial, dan Lingkungan Hidup dalam pelaksanaan proses pembangunan di Indonesia.

Melalui semangat tersebut, Bank Sinarmas telah dan akan terus berupaya menyusun program-program keuangan berkelanjutan antara lain seperti meningkatkan program inklusi keuangan untuk meningkatkan perekonomian dan kesejahteraan masyarakat, meningkatkan keberlanjutan dalam program tanggung jawab sosial perusahaan, meningkatkan program-program kesejahteraan karyawan, serta berhati-hati dalam penyaluran kredit sehingga tidak membahayakan lingkungan.

## IMPLEMENTATION OF SUSTAINABLE FINANCE

Bank Sinarmas has a great concern for the development of sustainable finance. The Bank realizes the importance of the issue of sustainable finance management by prioritizing the application of the triple bottom line principle in the Bank's business activities—people, profit, and planet—where economic, social, and environmental aspects are 3 (three) things that should run in harmony. The direction of the regulation of the implementation of Sustainable Finance is to encourage the creation of Sustainable Finance in the financial services sector that supports economic, social, and environmental sustainability in the implementation of the development process in Indonesia.

Through this spirit, Bank Sinarmas has and will continue to strive to formulate sustainable finance programs, including increasing financial inclusion programs to improve the economy and community welfare, increasing sustainability in corporate social responsibility programs, improving employee welfare programs, and being careful in distributing credit so as not to endanger the environment.

## Penerapan Rencana Aksi Keuangan Berkelanjutan (RAKB)

Bank Sinarmas telah menyusun langkah inisiatif dan rencana strategis dalam penerapan keuangan berkelanjutan yang tercantum dalam Rencana Aksi Keuangan Berkelanjutan (RAKB). Melalui aspek keberlanjutan yang tertuang dalam RAKB, Bank berperan penting dalam mendukung Tujuan Pembangunan Berkelanjutan (TPB).

Bank Sinarmas memiliki 3 (tiga) prioritas yang dituangkan dalam *roadmap* RAKB yaitu:

1. Pengembangan Kapasitas Intern;
2. Pengembangan Produk dan Layanan Keuangan Berkelanjutan;
3. Penyesuaian Tata Kelola, Organisasi dan Lingkungan Kerja yang sesuai Prinsip Keuangan Berkelanjutan.

## Implementation of Sustainable Finance Action Plan (RAKB)

Bank Sinarmas has prepared initiative measures and strategic plans for implementing sustainable finance as stated in the Sustainable Finance Action Plan (RAKB). Through the sustainability aspects stated in the RAKB, the Bank plays an important role in supporting the Sustainable Development Goals (SDGs).

Bank Sinarmas has established 3 (three) priorities stated in the RAKB roadmap, namely:

1. Internal Capacity Development;
2. Development of Sustainable Finance Products and Services;
3. Adjustment of Governance, Organization and Work Environment in accordance with Sustainable Finance Principles.

### Peta Jalan RAKB

**Sustainable Finance Action Plan Roadmap**

| **Prioritas Keuangan Berkelanjutan** Sustainable Finance Priorities | 2024 | 2025 | 2026 | 2027 | 2028 |
|---|---|---|---|---|---|
| Pengembangan Kapasitas Intern | 1) Program *Awareness* Rencana Aksi Keuangan Berkelanjutan.<br>2) *Refreshment* Materi Rencana Aksi Keuangan Berkelanjutan.<br>3) Memantau parameter KPI keuangan berkelanjutan pada KPI unit kerja terkait di KPNO untuk menyesuaikan dengan strategi perusahaan.<br>4) Proses *improvement* melalui pengembangan sistem dan aplikasi.<br>5) Pelaksanaan 360 *Degree Assessment* karyawan: Penerapan 360 *degree assessment* karyawan secara bertahap dan periodik sebagai dasar rencana pengembangan karyawan.<br>6) Pelaksanaan pengembangan Karyawan berbasis kompetensi sebagai tindak lanjut pelaksanaan kegiatan *assessment* dan pemenuhan kebutuhan organisasi.<br>7) Program rutin *work life balance*. | | | 1) Pelaksanaan 360 Degree Assessment karyawan: Penerapan 360 degree assessment karyawan secara bertahap dan periodik sebagai dasar rencana pengembangan karyawan.<br>2) Pelaksanaan pengembangan Karyawan berbasis kompetensi sebagai tindak lanjut pelaksanaan kegiatan *assessment* dan pemenuhan kebutuhan organisasi.<br>3) Program *Awareness* Rencana Aksi Keuangan Berkelanjutan<br>*4) Refreshment* materi RAKB kepada semua karyawan.<br>5) Program rutin *work life balance*.<br>6) Proses *improvement* melalui pengembangan sistem dan aplikasi. Memantau parameter KPI keuangan berkelanjutan pada KPI unit kerja terkait di KPNO untuk menyesuaikan dengan strategi perusahaan. | |
| Internal Capacity Development | 1) Sustainable Finance Action Plan Awareness Program.<br>2) Refreshment of Sustainable Finance Action Plan Material.<br>3) Monitoring sustainable finance KPI parameters on related work unit KPIs in KPNO to align with company strategy.<br>4) Improvement process through system and application development.<br>5) Implementation of 360 Degree Employee Assessment: Implementation of 360 degree employee assessments gradually and periodically as the basis for employee development plans.<br>6) Implementation of competency-based Employee development as a follow-up to the implementation of assessment activities and fulfillment of organizational needs.<br>7) Implementation of routine work life balance program. | | | 1) Implementation of 360 Degree Employee Assessment: Implementation of 360 degree employee assessment gradually and periodically as the basis for employee development plans.<br>2) Implementation of competency-based Employee development as a follow-up to the implementation of assessment activities and fulfillment of organizational needs.<br>3) Sustainable Finance Action Plan Awareness Program<br>4) Refreshment of RAKB materials to all employees.<br>5) Implementation of routine work life balance program.<br>6) Improvement process through system and application development. Monitoring sustainable finance KPI parameters on related work unit KPIs at KPNO to align with company strategy. | |

| **Prioritas Keuangan Berkelanjutan** Sustainable Finance Priorities | 2024 | 2025 | 2026 | 2027 | 2028 |
|---|---|---|---|---|---|
| Pengembangan Produk dan Layanan Keuangan Berkelanjutan | 1) Membeli obligasi Pemerintah *green*/keuangan berkelanjutan<br>2) Pembukaan Rekening dan Transaksi Reksa Dana melalui Simobiplus.<br>3) Menyalurkan produk kredit/pembiayaan baru yang inovatif.<br>4) Aktivitas yang dapat meningkatkan keaktifan nasabah untuk selalu menggunakan layanan perbankan digital. | 1) Memperluas jangkauan kredit kepada UMKM dengan dukungan teknologi informasi.<br>2) Membeli obligasi pemerintah *green*/keuangan berkelanjutan.<br>3) Penyaluran kredit dengan aplikasi yang mudah, cepat dan Smart.<br>4) Aktivitas yang dapat meningkatkan keaktifan nasabah untuk selalu menggunakan layanan perbankan digital.<br>5) *Retail Bonds* | 1) Meningkatkan penyaluran kredit kepada UMKM<br>2) Aktivitas yang dapat meningkatkan keaktifan nasabah untuk selalu menggunakan layanan perbankan digital.<br>3) Membeli obligasi pemerintah *green*/keuangan berkelanjutan | 1) Aktivitas yang dapat meningkatkan keaktifan nasabah untuk selalu menggunakan layanan perbankan digital.<br>2) Pengembangan aplikasi di Simobiplus.<br>3) Membeli obligasi pemerintah *green*/ keuangan berkelanjutan. | |
| Sustainable Finance Products and Services Development | 1) Purchasing government's green bonds/sustainable finance instruments.<br>2) Opening Mutual Fund Accounts and Transactions through Simobiplus.<br>3) Distributing new innovative credit/ financing products.<br>4) Conducting activities that can enhance customer engagement to consistently use digital banking services. | 1) Expanding the reach of credit to MSMEs with the support of information technology.<br>2) Purchasing government's green bonds / sustainable finance instruments.<br>3) Credit distribution with easy, fast and Smart applications.<br>4) Conducting activities can enhance customer engagement to consistently use digital banking services.<br>5) Retail Bonds. | 1) Increasing credit distribution to MSMEs<br>2) Conducting activities that can enhance customer engagement to consistently use digital banking services.<br>3) Purchasing government's green bonds/ sustainable finance instruments. | 1) Conducting activities that can enhance customer engagement to consistently use digital banking services.<br>2) Application development in Simobiplus.<br>3) Purchasing government's green bonds/ sustainable finance instruments. | |

| **Prioritas Keuangan Berkelanjutan** Sustainable Finance Priorities | 2024 | 2025 | 2026 | 2027 | 2028 |
|---|---|---|---|---|---|
| Penyesuaian Tata Kelola, Organisasi, dan Lingkungan Kerja yang Sesuai Prinsip Keuangan Berkelanjutan | 1) Menciptakan lingkungan kerja yang berwawasan lingkungan (penghematan penggunaan air, listrik dan kertas). Serta efisiensi waktu dan biaya operasional kantor.<br>2) Melakukan kajian dan sosialisasi atau penyampaian informasi kepada seluruh unit kerja dalam hal terdapat informasi atau ketentuan baru terkait Keuangan Berkelanjutan.<br>3) Evaluasi dan pengkinian ketentuan internal terkait keuangan berkelanjutan apabila diperlukan.<br>4) Bank Sinarmas berkomitmen untuk secara konsisten menerapkan pembangunan dalam pemberdayaan ekonomi, lingkungan, dan sosial yang berkelanjutan, serta terus mendukung program-program pemerintah, seperti Kredit Usaha Mikro, Kecil, dan Menengah (UMKM). | 1) Menciptakan lingkungan kerja yang berwawasan lingkungan (penghematan penggunaan air, listrik dan kertas). Serta efisiensi waktu dan biaya operasional kantor.<br>2) Melakukan kajian dan sosialisasi atau penyampaian informasi kepada seluruh unit kerja dalam hal terdapat informasi atau ketentuan baru terkait Keuangan Berkelanjutan.<br>3) Evaluasi dan pengkinian ketentuan internal terkait keuangan berkelanjutan apabila diperlukan.<br>4) Bank Sinarmas memberikan manfaat ekonomi yang berkelanjutan bagi masyarakat sekitar serta berkontribusi dalam pemberdayaan sosial. | 1) Menciptakan lingkungan kerja yang berwawasan lingkungan (penghematan penggunaan air, listrik dan kertas). Serta efisiensi waktu dan biaya operasional kantor.<br>2) Melakukan kajian dan sosialisasi atau penyampaian informasi kepada seluruh unit kerja dalam hal terdapat informasi atau ketentuan baru terkait Keuangan Berkelanjutan.<br>3) Evaluasi dan pengkinian ketentuan internal terkait keuangan berkelanjutan apabila diperlukan.<br>4) Bank Sinarmas berkomitmen untuk secara konsisten menerapkan pembangunan dalam pemberdayaan ekonomi, lingkungan, dan sosial yang berkelanjutan, serta terus mendukung program-program pemerintah, seperti Kredit Usaha Mikro, Kecil, dan Menengah (UMKM). | 1) Menciptakan lingkungan kerja yang berwawasan lingkungan (penghematan penggunaan air, listrik dan kertas). Serta efisiensi waktu dan biaya operasional kantor.<br>2) Melakukan kajian dan sosialisasi atau penyampaian informasi kepada seluruh unit kerja dalam hal terdapat informasi atau ketentuan baru terkait Keuangan Berkelanjutan.<br>3) Evaluasi dan pengkinian ketentuan internal terkait keuangan berkelanjutan apabila diperlukan.<br>4) Bank Sinarmas memberikan manfaat ekonomi yang berkelanjutan bagi masyarakat sekitar serta berkontribusi dalam pemberdayaan sosial. | 1) Menciptakan lingkungan kerja yang berwawasan lingkungan (penghematan penggunaan air, listrik dan kertas). Serta efisiensi waktu dan biaya operasional kantor.<br>2) Melakukan kajian dan sosialisasi atau penyampaian informasi kepada seluruh unit kerja dalam hal terdapat informasi atau ketentuan baru terkait Keuangan Berkelanjutan.<br>3) Evaluasi dan pengkinian ketentuan internal terkait keuangan berkelanjutan apabila diperlukan.<br>4) Bank Sinarmas memberikan manfaat ekonomi yang berkelanjutan bagi masyarakat sekitar serta berkontribusi dalam pemberdayaan sosial. |

| **Prioritas Keuangan Berkelanjutan** Sustainable Finance Priorities | 2024 | 2025 | 2026 | 2027 | 2028 |
|---|---|---|---|---|---|
| Adjustment of Governance, Organization, and Work Environment in Accordance with Sustainable Finance Principles | 1) Creating an environmentally friendly work environment (conserving water, electricity and paper utilization). As well as efficiency of time and office operational costs.<br>2) Conducting studies and dissemination or delivering information across all work units in the event of new information or provisions related to Sustainable Finance.<br>3) Evaluating and updating internal provisions related to sustainable finance if necessary.<br>4) Bank Sinarmas is committed to consistently implementing development in sustainable economic, environmental and social empowerment, as well as continuing to support government programs, such as Micro, Small and Medium Enterprises (MSMEs) Credit. | 1) Creating an environmentally friendly work environment (conserving water, electricity and paper utilization). As well as efficiency of time and office operational costs.<br>2) Conducting studies and dissemination or delivering information across all work units in the event of new information or provisions related to Sustainable Finance.<br>3) Evaluating and updating internal regulations related to sustainable finance if necessary.<br>4) Bank Sinarmas provides sustainable economic benefits to the surrounding community and contributes to social empowerment. | 1) Creating an environmentally friendly work environment (conserving water, electricity and paper utilization). As well as efficiency of time and office operational costs.<br>2) Conducting studies and dissemination or delivering information across all work units in the event of new information or regulations related to Sustainable Finance.<br>3) Evaluating and updating internal provisions related to sustainable finance if necessary.<br>4) Bank Sinarmas is committed to consistently implementing development in sustainable economic, environmental and social empowerment, as well as continuing to support government programs, such as Micro, Small and Medium Enterprises (MSMEs) Credit. | 1) Creating an environmentally friendly work environment (conserving water, electricity and paper utilization). As well as efficiency of time and office operational costs.<br>2) Conducting studies and dissemination or delivering information across all work units in the event of new information or regulations related to Sustainable Finance.<br>3) Evaluating and updating internal provisions related to sustainable finance if necessary.<br>4) Bank Sinarmas provides sustainable economic benefits to the surrounding community and contributes to social empowerment. | 1) Creating an environmentally friendly work environment (conserving water, electricity and paper utilization). As well as efficiency of time and office operational costs.<br>2) Conducting studies and dissemination or delivering information across all work units in the event of new information or regulations related to Sustainable Finance.<br>3) Evaluating and updating internal provisions related to sustainable finance if necessary.<br>4) Bank Sinarmas provides sustainable economic benefits to the surrounding community and contributes to social empowerment. |



Selain *roadmap* lima tahun, Bank Sinarmas memiliki rencana satu tahunan yang telah disusun untuk tahun 2024 berdasarkan target kegiatan prioritas.

In addition to the five-year roadmap, Bank Sinarmas has established a one-year plan that has been formulated for 2024 based on priority activity targets.

## Rencana Satu Tahunan RAKB 2024

**One Year Plan of the 2024 Sustainable Finance Action Plan (RAKB)**

| **Uraian Aktivitas** Activity Description | Tujuan Aktivitas Activity Objectives | **Indikator Keberhasilan** Success Indicators |
|---|---|---|
| Kerja sama pembukaan rekening *online* melalui platform Partner (Pihak Ketiga) | 1) Memperluas kanal akuisisi nasabah Bank Sinarmas untuk meningkatkan inklusivitas keuangan dan meningkatkan *brand awareness*.<br>2) Menambah Portofolio DPK dalam bentuk CASA dari nasabah baru tersebut.<br>3) Sebagai sarana promosi Bank Sinarmas sehingga meningkatkan *brand Image* di masyarakat. | 1) Aktivitas dapat diimplementasikan.<br>2) Jumlah pihak ketiga yang bekerja sama dan jumlah akuisisi rekening tabungan *online* melalui meningkat. |
| Collaborating on online accounts opening through Partner platforms (Third Parties) | 1) Expanding Bank Sinarmas' customer acquisition channels to promote financial inclusiveness and increase brand awareness.<br>2) Increasing the TPF Portfolio in the form of CASA from new customers.<br>3) As a means of promoting Bank Sinarmas so as to increase the brand image in the community. | 1) Activities is able to be implemented.<br>2) The number of third parties cooperating and the number of online savings account acquisitions increases. |

| **Uraian Aktivitas**<br>Activity Description | Tujuan Aktivitas<br>Activity Objectives | **Indikator Keberhasilan**<br>Success Indicators |
|---|---|---|
| Menciptakan lingkungan kerja yang berwawasan lingkungan. | Mendukung pelaksanaan keuangan berkelanjutan pada lingkungan kerja internal. | Adapun programnya sebagai berikut:<br>1) Print out dan fotokopi bolak balik dan mulai menjalankan budaya permintaan persetujuan menggunakan e-sign.<br>2) Mematikan lampu pada jam-jam istirahat<br>3) Mematikan AC mulai pukul 17.00 WIB (setelah jam kerja).<br>4) Mematikan komputer (personal computer) dan peralatan lain pada saat menjelang hari libur (khusus personal computer tidak dalam kondisi standby)<br>5) Penggunaan lampu LED<br>6) Pemasangan Surya Panel<br>7) Penambahan Motor Listrik (12 unit). |
| Creating an environmentally friendly work environment. | Promoting the implementation of sustainable finance within the internal work environment. | The programs are as follows:<br>1) Printing out and making photocopy on both sides of paper and start implementing the culture of requesting approval using e-sign.<br>2) Turning off lights during break times<br>3) Turning off the AC starting at 17.00 WIB (after working hours).<br>4) Turning off computers (personal computers) and other equipment during holidays (especially personal computers are not on standby mode)<br>5) Utilizing LED lights<br>6) Installing Solar Panels<br>7) Adding Electric Motorcycles (12 units). |
| Menyalurkan dan kredit terutama kepada sektor UMKM dengan produk Kredit Usaha Rakyat (KUR) | Meningkatkan portfolio kredit serta mendukung kepentingan pembangunan nasional dan program unggulan pemerintah. | 1) Kuota Kredit Usaha Rakyat (KUR) Mikro sebesar Rp5 miliar dapat disalurkan.<br>2) Kuota Kredit Usaha Rakyat (KUR) Kecil sebesar Rp395 miliar dapat disalurkan. |
| Channeling credit funds, especially to the SME sector with the People's Business Credit (KUR) product. | Increasing credit portfolio and supporting national development interests and government flagship programs. | 1) People's Business Credit (KUR) quota of Rp5 billion can be disbursed.<br>2) People's Business Credit (KUR) quota of Rp395 billion can be disbursed. |
| 1) Program *Awareness* Rencana Aksi Keuangan Berkelanjutan.<br>*2) Refreshment* Materi Rencana Aksi Keuangan Berkelanjutan.<br>3) Memantau parameter KPI keuangan berkelanjutan pada KPI unit kerja terkait di KPNO untuk menyesuaikan dengan strategi perusahaan.<br>4) Proses *Improvement* melalui pengembangan sistem dan aplikasi.<br>5) Pelaksanaan *360 Degree Assessment* karyawan: Penerapan 360 *degree assessment* karyawan secara bertahap dan periodik sebagai dasar rencana pengembangan karyawan.<br>6) Pelaksanaan pengembangan karyawan berbasis kompetensi sebagai tindak lanjut pelaksanaan kegiatan *assessment* dan pemenuhan kebutuhan organisasi.<br>7) Program rutin *work life balance*. | 1) Melaksanakan program *awareness* kepada seluruh karyawan, termasuk karyawan baru, melalui program pelatihan yang terdiri dari *e-learning* dan *in-class session* untuk memastikan pemahaman yang mendalam mengenai RAKB yang dijalankan oleh perusahaan.<br>2) Menyelenggarakan program penyegaran dan pembaruan materi RAKB kepada unit-unit yang terlibat dalam penyusunan RAKB untuk memastikan keselarasan pemahaman dan implementasi yang tepat.<br>3) Memastikan bahwa seluruh kegiatan bisnis dan operasional perusahaan selaras dengan prinsip keuangan berkelanjutan untuk mendukung tujuan jangka panjang yang bertanggung jawab.<br>4) Melakukan *refresh pada core system* HCM agar menjadi lebih robust dan sesuai dengan standar internasional, guna mendukung pengelolaan sumber daya manusia yang lebih efektif dan efisien.<br>5) Menerapkan *360-degree assessment* bagi karyawan secara periodik sebagai dasar dalam perencanaan pengembangan karir dan peningkatan kinerja individu.<br>6) Menjamin bahwa setiap karyawan memiliki kompetensi yang dibutuhkan dalam pekerjaannya, sekaligus mendukung pengembangan diri dan karir, serta memastikan keberlangsungan perusahaan dalam jangka panjang.<br>7) Meningkatkan engagement karyawan agar memiliki rasa keterikatan yang tinggi terhadap perusahaan dan termotivasi untuk memberikan kontribusi terbaik dalam mencapai tujuan perusahaan. | 1) Seluruh karyawan melaksanakan program *awareness* RAKB.<br>2) Unit yang berpartisipasi dalam penyusunan RAKB melaksanakan program awareness RAKB.<br>3) KPI Unit Kerja terkait sudah memasukkan KPI keuangan berkelanjutan.<br>4) *Enhancement* dan pengembangan sistem yang dibutuhkan terimplementasi dengan baik dan sesuai rencana.<br>5) Terlaksana sesuai dengan level jabatan yang dituju.<br>6) Terlaksana sesuai dengan rancangan program pengembangan.<br>7) Akan dilaksanakan kegiatan *employee engagement* setiap 3 bulan sekali selama 1 tahun, program rutin komunitas untuk olahraga dan hobi, serta pemberian penghargaan masa kerja karyawan. |

| **Uraian Aktivitas**<br>Activity Description | Tujuan Aktivitas<br>Activity Objectives | **Indikator Keberhasilan**<br>Success Indicators |
|---|---|---|
| 1) Sustainable Financial Action Plan Awareness Program.<br>2) Refreshment of Sustainable Finance Action Plan Material.<br>3) Monitoring sustainable finance KPI parameters on related work unit KPIs in KPNO to align with Company strategies.<br>4) Improvement process through system and application development.<br>5) Implementing 360 Degree Employee Assessment: Implementing 360 degree employee assessments gradually and periodically as the basis for employee development plans.<br>6) Implementing competency-based employee development as a follow-up to the implementation of assessment activities and fulfillment of organizational needs.<br>7) Implementing routine work life balance program. | 1) Conducting awareness programs for all employees, including new employees, through training programs consisting of e-learning and in-class sessions to ensure a deep understanding of the Company's Bank Policy Action Plan (RAKB)..<br>2) Organizing refreshment programs and update on RAKB materials to units involved in the preparation of RAKB to ensure alignment of understanding and proper implementation.<br>3) Ensuring that all business and operational activities of the company are aligned with sustainable finance principles to support the objectives<br>4) Refreshing the HCM core system to make it more robust and in accordance with international standards, to support more effective and efficient human resource management.<br>5) Implementing 360-degree assessments for employees periodically as a basis for career development planning and improving individual performance.<br>6) Ensuring that every employee has the competencies needed in their work, while supporting self-development and career, and ensuring the long-term sustainability of the Company.<br>7) Improving employee engagement so that they have a high sense of attachment to the Company and are motivated to provide the best contribution in achieving Company goals. | 1) All employees implement the RAKB awareness program.<br>2) Units participating in the formulation of RAKB implement the RAKB awareness program.<br>3) The related Work Unit KPI has included sustainable finance KPI.<br>4) Enhancements and developments of required system are well-implemented and in line with the plan.<br>5) Program can be implemented according to the targeted position level.<br>6) Implemented according to the development program design.<br>7) Employee engagement activities will be carried out quarterly for one year, routine community programs for sports and hobbies, as well as recognition of employees' length of service. |
| 1) Pelatihan dan edukasi kepada masyarakat dalam hal kapasitas, keahlian, dan kesejahteraan.<br>2) Diseminasi Aplikasi Olah Limbah Peternakan dan Sampah Organik Basis Teknologi Konsorsium MOL Biotaro untuk Pangan Sehat di Kabupaten Gianyar, Bali. | 1) Meningkatkan edukasi kepada masyarakat untuk membentuk masyarakat yang berkualitas dan berkompeten. Revitalisasi *rooftop* baca TBM Lentera Pustaka agar dapat memberikan kenyamanan bagi anak-anak dalam membaca dan mendukung aktivitas/ event bulanan yang telah dilakukan secara rutin. Ini juga merupakan wujud komitmen Bank terhadap peningkatan minat baca anak dan budaya literasi masyarakat.<br>2) Melakukan diseminasi aplikasi olah limbah peternakan dan sampah organik menggunakan teknologi konsorsium MOL Biotaro dan membangun ekonomi sirkular untuk pertanian pangan sehat. Hal ini dilakukan dengan melibatkan peran aktif masyarakat dalam ekonomi sirkular melalui kegiatan pemberdayaan untuk membangun ketahanan pangan sehat yang ramah lingkungan, melalui optimalisasi sumber daya yang ada. | 1) Bank Sinarmas menyelenggarakan edukasi untuk membentuk masyarakat yang berkualitas dan kompeten.<br>2) Bank Sinarmas mengembangkan Program Desa Binaan ini dengan melaksanakan Program Pemanfaatan Limbah Peternakan Sapi Taro dan Pemberdayaan Model Pengolahan Sampah Organik di Desa Taro, Bali. |
| 1) Training and education for the community in terms of capacity, skills, and welfare.<br>2) Dissemination of Applications for Livestock Waste and Organic Waste Processing Based on MOL Biotaro Consortium Technology for Healthy Food in Gianyar Regency, Bali. | 1) Improving community education to form a quality and competent society. Revitalizing the rooftop reading area of Community Reading Park (Taman Bacaan Masyarakat/TBM) Lentera Pustaka to provide comfort for children in reading and support monthly activities/ events that have been carried out routinely. This is also a manifestation of the Bank's commitment to increasing children's interest in reading and the community's literacy culture.<br>2) Disseminating livestock waste and organic waste processing applications using MOL Biotaro consortium technology and building a circular economy for healthy food agriculture. This is done by involving the active role of the community in the circular economy through empowerment activities to build environmentally friendly healthy food security, through optimization of existing resources. | 1) Bank Sinarmas organizes education program to shape a quality and competent society.<br>2) Bank Sinarmas develops this Foster Village Program by implementing the Utilization of Taro Cattle Farm Waste Program and Empowerment of Organic Waste Processing Models in Taro Village, Bali. |
| Membeli obligasi pemerintah *green*/keuangan berkelanjutan. | Turut berkontribusi terhadap pengembangan dan penyaluran dana untuk ekonomi hijau maupun keuangan inklusif. | Bank berhasil membeli obligasi pemerintah *green*/keuangan berkelanjutan baik SBN maupun SBSN. |
| Purchasing government's green bonds/sustainable finance instruments. | Contribute to the development and distribution of funds for the green economy and inclusive finance. | The Bank successfully purchased government's green bonds/sustainable finance instruments, both SBN and SBSN. |
| Pembukaan RDN digital secara penuh atau *online* | Mendukung aktivitas perbankan yang *less paper* sehingga dapat mengurangi limbah kertas. | Meningkatnya pembukaan RDN digital secara penuh atau *online*. |
| Opening digital Customer Fund Accounts (RDN) in full or online | Promoting less paper banking activities to reduce paper waste. | Increased opening of digital Customer Fund Accounts in full or online. |

| **Uraian Aktivitas**<br>Activity Description | Tujuan Aktivitas<br>Activity Objectives | **Indikator Keberhasilan**<br>Success Indicators |
|---|---|---|
| 1) Penyaluran KPR.<br>2) Kerja sama dengan pihak ketiga (P2P Lending, E-Commerce, Agent Property, Developer). | 1) Meningkatkan portofolio kredit dan menyediakan fasilitas kredit agar konsumen dapat membeli rumah secara kredit.<br>2) Mempercepat proses akuisisi dan mempermudah nasabah untuk mendapatkan akses fasilitas kredit yang diberikan oleh bank. | 1) Tercapainya disburse KPR NoA dan tercapainya disburse KPR secara baki debet/ OS.<br>2) Menjalin kerja sama dengan 10 partner. |
| 1) Mortgage Distribution.<br>2) Collaboration with third parties (P2P Lending, E-Commerce, Property Agent, Developer). | 1) Increasing credit portfolio and providing credit facilities, so that consumers can afford buy houses on credit.<br>2) Accelerating the acquisition process and providing customers with easy access credit facilities offered by the Bank. | 1) Achieving NoA (Number of Account) Mortgage disbursement and Mortgage disbursement on debit balance/OS.<br>2) Establishing cooperation with 10 partners. |
| 1) Pembukaan rekening Reksa Dana digital secara penuh atau *online*.<br>2) Transaksi Reksa Dana digital secara penuh atau *online*. | Mendukung aktivitas perbankan yang *less paper* sehingga dapat mengurangi limbah kertas. | 1) Meningkatnya Pembukaan Rekening Reksa Dana digital secara penuh atau *online*.<br>2) Meningkatnya volume transaksi, AUM dan FBI Reksa Dana. |
| 1) Opening of digital Mutual Fund account in full or online.<br>2) Transactions of digital Mutual Fund in full or online. | Promoting less paper banking activities to reduce paper waste. | 1) Increased opening of digital mutual fund accounts in full or online.<br>2) Increased transaction volume, AUM and FBI of mutual funds. |

## Realisasi Pembiayaan Keuangan Berkelanjutan

[OJK F.3]

Sepanjang tahun 2024, realisasi penyaluran kredit kepada Kategori Kegiatan Usaha Berkelanjutan (KKUB) mencapai Rp1,80 triliun. Penjelasannya dapat dilihat pada penjelasan berikut:

## Realization of Sustainable Business Activity Financing [OJK F.3]

In 2024, the realization of credit disbursement to the Sustainable Business Activity Category (KKUB) reached Rp1.80 trillion. The explanation can be seen as follows:

*dalam jutaan Rupiah, kecuali dinyatakan lain
*in millions of Rupiah, unless otherwise stated

| **Uraian**<br>Description | 2024 | 2023 | 2022 |
|---|---|---|---|
| Jumlah Produk yang Memenuhi Kriteria Kegiatan Usaha Berkelanjutan<br>Total products that meet the criteria for sustainable business activities | | | |
| a. Penghimpunan Dana<br>Fund Raising | 1.976.924 | 2.112.628 | 1.187.866 |
| b. Penyaluran Dana<br>Fund Distribution | 1.797.047 | 2.390.568 | 2.372.966 |
| Jumlah Aset Produktif Kegiatan Usaha Berkelanjutan<br>Total Productive Assets of Sustainable Business Activities | | | |
| a. Jumlah Kredit/Pembiayaan Kegiatan Usaha Berkelanjutan<br>Total Credit/Financing of Sustainable Business Activities | 1.797.047 | 2.390.568 | 2.372.976 |
| b. Jumlah Non-Kredit/Pembiayaan Non-Kegiatan Usaha Berkelanjutan<br>Total Non-Credit/Financing of Sustainable Business Activities | 9.419.958 | 14.907.092 | 13.420.826 |
| Persentase Jumlah Kredit/Pembiayaan Kegiatan Usaha berkelanjutan terhadap Jumlah Kredit/ Pembiayaan Bank (%)<br>Percentage of Total Credit/Financing of Sustainable Business Activities to Total Bank's Credit/Financing (%) | 16,07 | 13,82 | 14,93 |

| Uraian<br>Description | 2024 | | 2023 | | 2022 | |
|---|---|---|---|---|---|---|
| | Nilai (jutaan Rupiah)<br>Value (millions of Rupiah) | NPL (%) | Nilai (jutaan Rupiah)<br>Value (millions of Rupiah) | NPL (%) | Nilai (jutaan Rupiah)<br>Value (millions of Rupiah) | NPL (%) |
| Energi Terbarukan<br>Renewable Energy | - | - | - | - | - | - |
| Transportasi Ramah Lingkungan<br>Environmentally Friendly Transportation | 4.198 | 0 | 3.489 | 0,00 | | |
| Produk yang Dapat Mengurangi Penggunaan Sumber Daya dan Menghasilkan Lebih Sedikit Polusi<br>Products That Can Reduce Resource Utilization and Generate Less Pollution | 946 | 4,59 | 1.017 | 2,86 | 11,36 | 2,20 |
| Bangunan Berwawasan Lingkungan yang Memenuhi Standar atau Sertifikasi yang Diakui Secara Nasional, Regional, atau Internasional.<br>Environmentally Friendly Buildings that Meet Nationally, Regionally, or Internationally Recognized Standards or Certifications | 269.791 | 0 | 506.500 | 0,00 | | |
| Kegiatan UMKM<br>MSME Activities | 1.522.112 | 1,79 | 1.879.562 | 2,01 | 2.372.965 | 1,52 |



## PRIORITAS DUKUNGAN TERHADAP TUJUAN PEMBANGUNAN BERKELANJUTAN

Bank Sinarmas telah melakukan pemetaan dukungan pada TPB berdasarkan prioritas kegiatan RAKB 2024 serta pelaksanaan program sosial dan lingkungan sebagai berikut:

## PRIORITY SUPPORT FOR SUSTAINABLE DEVELOPMENT GOALS

Bank Sinarmas has mapped its support for the Sustainable Development Goals (SDGs) based on the priority activities outlined in the 2024 Sustainable Finance Action Plan (RAKB), as well as the implementation of social and environmental programs, as follows:

| Target | Realisasi<br>Realization |
|---|---|
|  | • Bank Sinarmas meluncurkan Tabungan SIMPEL (SIMpenan PELajar) untuk 20 anak pembaca aktif TBM Lentera Pustaka di Bogor pada tanggal 18 Februari 2024.<br>• Bank Sinarmas bersinergi dengan TBM Lentera Pustaka mengadakan Festival Literasi Gunung Salak #7 di, Bogor, Jawa Barat.<br>• Peresmian kanopi *rooftop* baca, penyerahan tas sekolah Tzu Chi, donasi 5 perangkat komputer literasi digital, dan peluncuran motor baca SIMOBI<br>• Penyelenggaraan 15 program literasi keuangan bekerja sama dengan berbagai pihak<br><br>• Bank Sinarmas launched SIMPEL Savings (SIMpenan PELajar) for 20 active children of TBM Lentera Pustaka readers in Bogor on February 18, 2024.<br>• Bank Sinarmas in synergy with TBM Lentera Pustaka held the Gunung Salak Literacy Festival #7 in Bogor, West Java.<br>• Inauguration of the rooftop reading canopy, handover of Tzu Chi school bags, donation of 5 digital literacy computer devices, and launch of the SIMOBI reading motorbike<br>• Implementation of 15 financial literacy programs in collaboration with various parties |
|  | • Sepanjang tahun 2024, Bank Sinarmas telah merekrut 1.375 karyawan baru. Proses rekrutmen dijalankan secara profesional dan tanpa diskriminasi, dimana seluruh kandidat karyawan dievaluasi dan dinilai berdasarkan kompetensi dan pengalaman yang relevan<br>• Per tanggal 31 Desember 2024, komposisi karyawan wanita di Bank adalah sebesar 50,7 %.<br>• Kebijakan remunerasi mematuhi seluruh ketentuan perundang-undangan yang berlaku, termasuk standar upah minimum yang ditetapkan oleh pemerintah.<br>• Memberikan 413.595,07 jam pelatihan dengan rata-rata 100,02 jam pelatihan per karyawan pada 2024.<br><br>• In 2024, Bank Sinarmas recruited 1,375 new employees. The recruitment process was conducted professionally and without discrimination, where all employee candidates are evaluated and assessed based on relevant competencies and experience<br>• As of December 31, 2024, the composition of female employees at the Bank was 50.7%.<br>• The remuneration policy complies with all applicable laws and regulations, including the minimum wage standards set by the government.<br>• Providing 413,595.07 hours of training with an average of 100.02 hours of training per employee in 2024. |

| Target | Realisasi<br>Realization |
|---|---|
|  | • Pengaturan pemakaian pendingin ruangan dan lampu, serta penggunaan lampu Light Emitting Diode (LED) di beberapa wilayah operasional.<br>• Penggunaan sumber energi terbarukan yang berasal dari panel surya di Kantor Cabang Klampis dan Diponegoro.<br>• Penggunaan motor listrik sebagai pengganti kendaraan berbahan bakar fosil dalam kegiatan operasional di beberapa kantor cabang.<br>• Pelaksanaan rapat atau pertemuan secara daring sehingga mengurangi penggunaan kendaraan operasional kantor.<br>• Penyediaan ruang terbuka hijau di sekitar wilayah kantor.<br>• Sosialisasi penerapan konsep paperless dalam kegiatan operasional untuk mengurangi penggunaan kertas.<br>• Program Diseminasi Aplikasi Olah Limbah Peternakan dan Sampah Organik Basis Teknologi Konsorsium MOL Biotaro untuk Pangan Sehat di Kabupaten Gianyar, Bali<br>• Penanaman Bibit Bambu di Area sekitar Pabrik Tjiwi Kimia oleh Bank Sinarmas KC Mojokerto<br><br>• Managing air conditioning and lighting utilization, as well as the use of Light Emitting Diode (LED) lamps in several operational areas.<br>• Utilizing renewable energy sources from solar panels at the Klampis and Diponegoro Branch Offices.<br>• Utilizing electric motorcycles as a substitute for fossil fuel vehicles in operational activities at several branch offices.<br>• Implementing online meetings or gatherings to reduce the use of office operational vehicles.<br>• Providing green open spaces around office areas.<br>• Socialization of the application of the paperless concept in operational activities to reduce paper usage.<br>• Dissemination Program for Applications for Processing Livestock Waste and Organic Waste Based on MOL Biotaro Consortium Technology for Healthy Food in Gianyar Regency, Bali<br>• Planting of Bamboo Seedlings in the Area around the Tjiwi Kimia Factory by Bank Sinarmas KC Mojokerto |
|  | • Memenuhi indikator kepatuhan, yaitu Kewajiban Penyediaan Modal Minimum (KPMM), Non-Performing Loan (NPL) Net, Batas Maksimum Pemberian Kredit (BMPK), dan Rasio<br>• Pembiayaan Inklusif Makroprudensial (RPIM); serta Seluruh pekerja telah menandatangani Pakta Integritas dan Kode Etik.<br>• Realisasi penyaluran kredit kepada Kategori Kegiatan Usaha Berkelanjutan (KKUB) pada 2024 mencapai Rp1,80 triliun<br><br>• Fulfilling compliance indicators, namely Minimum Capital Adequacy Requirement (CAR), Net Non-Performing Loan (NPL), Legal Limit Lending (BMPK), and Macroprudential Inclusive Financing Ratio (RPIM); and<br>• All employees have signed the Integrity Pact and Code of Ethics.<br>• Realization of credit disbursement to the Sustainable Business Activity Category (KKUB) in 2024 reached Rp1.80 trillion. |

# MENGELOLA KEBERLANJUTAN
## Managing Sustainability





### PENANGGUNG JAWAB PENERAPAN KEUANGAN BERKELANJUTAN [OJK E.1][GRI 2-9] [GRI 2-12][GRI 2-13][GRI 2-14]

Bank telah menunjuk Compliance Group untuk mengawasi pelaksanaan kebijakan keuangan berkelanjutan yang bertanggung jawab langsung kepada Direksi. Tim Compliance bekerja sama dengan unit-unit terkait dalam kegiatan operasional dan menerapkan praktik tata kelola keberlanjutan. Sedangkan Direksi memiliki peran dalam mengawasi pelaksanaan keuangan berkelanjutan, mengawasi penyusunan Laporan Keberlanjutan dan memberikan persetujuan terhadap laporan tersebut.

Selain itu, Bank juga telah memiliki kebijakan induk yang mengatur tentang penerapan keuangan berkelanjutan. Adapun pelaksanaannya didelegasikan ke seluruh unit kerja di lingkungan organisasi internal. Bank berupaya untuk memastikan bahwa prinsip-prinsip keuangan berkelanjutan dapat terus melekat dan diterapkan pada semua aspek usaha.

### PERSON IN CHARGE OF SUSTAINABLE FINANCE IMPLEMENTATION [OJK E.1][GRI 2-9][GRI 2-12][GRI 2-13][GRI 2-14]

The Bank has appointed a Compliance Group to oversee the implementation of sustainable finance policies, and it reports directly to the Board of Directors. The Compliance team collaborates closely with relevant units on operational activities and sustainable governance practices. Meanwhile, the Board of Directors is responsible for overseeing the implementation of sustainable finance, as well as the preparation and approval of the Sustainability Report.

In addition, the Bank has a parent policy that governs the implementation of sustainable finance. The implementation is delegated to all internal work units. The Bank strives to ensure that sustainable finance principles are embedded and applied across all aspects of the business.

## PENGEMBANGAN KOMPETENSI KEUANGAN BERKELANJUTAN [OJK E.2][GRI 2-17]

Dalam menghadapi perkembangan pengetahuan, standar, dan regulasi terkait keuangan berkelanjutan, Bank Sinarmas memberikan pengembangan kompetensi kepada berbagai tingkatan jabatan. Pengembangan kompetensi ini berada di bawah tanggung jawab Divisi Human Capital Management Group dan menggunakan metode *e-learning* dan *in-class*.

Selain itu, Bank juga menjalin kerja sama dengan pihak eksternal untuk menyelenggarakan pelatihan dan *webinar* terkait keuangan berkelanjutan. Adapun total biaya yang dikeluarkan untuk pengembangan kompetensi keberlanjutan pada 2024 mencapai Rp12.935.000 yang diikuti sebanyak 1.219 karyawan.

## COMPETENCY DEVELOPMENT IN SUSTAINABLE FINANCE [OJK E.2][GRI 2-17]

Bank Sinarmas provides competency development to employees at all levels in response to the development of knowledge, standards, and regulations related to sustainable finance. The Human Capital Management Group Division is in charge of this competency development, which is done through e-learning and in-person classes.

Furthermore, the Bank collaborates with external parties to organize sustainable finance training and webinars. The total cost for sustainability competency development in 2024 was Rp12,935,000, with 1,219 employees participating.

### Pengembangan Kompetensi Keberlanjutan 2024
**Sustainability Competency Development in 2024**

| **Materi** Material | **Jumlah Peserta** Number of Participants | **Jam Pelatihan** Training Hours | **Peserta** Participant |
|---|---|---|---|
| Carbon Trading and Its Effect on Indonesia Economy | 2 | 3 | 4-SectHead / 5-Staff |
| Corporate ESG And Sustainability - 101 Level Masterclass | 1 | 4,5 | 4-SectHead |
| Customer Centricity - The Cornerstone of Sustainable Business Growth | 1 | 9 | 0-BOC & BOD |
| ESG & Sustainability: ESG Corporate Masterclass | 1 | 4,5 | 3-DeptHead |
| ESG 2.0: Understanding Sustainable Development Goals (SDGS) | 1 | 3 | 2-DivHead |
| ESG Mastery: Complete Corporate Sustainability | 1 | 1,4 | 4-SectHead |
| Fundamentals of ESG and Sustainable Finance for 2024 | 4 | 3 | 3-DeptHead / 4-SectHead |
| Global Sustainable Finance Landscape | 1 | 3 | 3-DeptHead |
| How Sustainability Is Changing the Financial Sector | 1 | 5 | 3-DeptHead |
| How To Prevent Greenwashing in Sustainable Finance | 118 | 3 | 3-DeptHead / 4-SectHead / 5-Staff |
| Membangun Kepemimpinan Berbasis Spiritual: Pendekatan Holistik Untuk Pertumbuhan dan Keberlanjutan Bisnis<br>Building Spiritual Leadership: A Holistic Approach to Business Growth and Sustainability | 4 | 3 | 3-DeptHead / 5-Staff |
| Open Class: Pemahaman Sustainability dan Peraturan Ojk Tentang Keuangan Berkelanjutan<br>Open Class: Understanding Sustainability and OJK Regulation on Sustainable Finance | 278 | 3 | 0-BOC & BOD / 1-GroupHead / 2-DivHead / 3-DeptHead / 4-SectHead / 5-Staff |
| Pendekatan Holistik Untuk Pertumbuhan dan Keberlanjutan Bisnis<br>A Holistic Approach to Business Growth and Sustainability | 1 | 3 | 5-Staff |
| Peran Taksonomi Untuk Keuangan Berlanjutan Indonesia (tkbi) Dalam Mendorong Transisi Energi Menuju Net Zero Emission Indonesia<br>The Role of Taxonomy for Indonesian Sustainable Finance (TKBI) in Driving the Energy Transition Towards Net Zero Emission in Indonesia | 42 | 3 | 2-DivHead / 3-DeptHead / 4-SectHead / 5-Staff |
| Setting Your Sail on The Indonesia Carbon Trading Ecosystem Oleh Bursa Efek Indonesia<br>Setting Your Sail on The Indonesia Carbon Trading Ecosystem by Indonesia Stock Exchange | 2 | 2 | 4-SectHead |
| Sosialisasi POJK Nomor 18 Tahun 2023 Tentang Penerbitan dan Persyaratan Efek Bersifat Utang dan Sukuk Berlandaskan Keberlanjutan<br>Socialization of POJK Number 18 of 2023 concerning the Issuance and Requirements of Debt Securities and Sukuk Based on Sustainability | 2 | 3 | 3-DeptHead / 4-SectHead |
| Sustainability and Corporate ESG | Practical Implementation | 1 | 4,5 | 4-SectHead |
| Sustainable Supply Chains 3: Procurement Strategies | 1 | 1,5 | 2-DivHead |
| Sustainable Worklife Greenify Your Hustle | 648 | 2 | 2-DivHead / 3-DeptHead / 4-SectHead / 5-Staff |

| Materi<br>Material | Jumlah Peserta<br>Number of Participants | Jam Pelatihan<br>Training Hours | Peserta<br>Participant |
|---|---|---|---|
| Sustainable, Green and Climate Finance | 1 | 1 | 4-SectHead |
| Taksonomi Untuk Keuangan Berkelanjutan Indonesia (TKBI)<br>Taxonomy for Indonesian Sustainable Finance (TKBI) | 3 | 8,5 | 3-DeptHead / 5-Staff |
| Taksonomi Untuk Keuangan Berkelanjutan Indonesia (TKBI) Dalam Mendorong Transisi Energi Menuju Net Zero Emission Indonesia<br>Taxonomy for Indonesian Sustainable Finance (TKBI) in Driving the Energy Transition Towards Net Zero Emission in Indonesia | 99 | 3 | 2-DivHead / 3-DeptHead / 4-SectHead / 5-Staff |
| The 1st OJK International Research Forum 2023: Save The Planet - The Role of Financial Sector to Support Carbon Reduction and Electric Vehicles Development | 1 | 3 | 3-DeptHead |
| Understanding & Managing Carbon Accounting: A Masterclass | 1 | 1,5 | 4-SectHead |
| Webinar Carbon Trading & It's Effect on Indonesia's Economy | 4 | 2,75 | 3-DeptHead / 4-SectHead |
| Total | 1.219 | 84,15 | |



## PENILAIAN RISIKO ATAS PENERAPAN KEUANGAN BERKELANJUTAN [OJK E.3][GRI 2-25]

Bank Sinarmas menyadari adanya potensi risiko dalam penerapan keuangan berkelanjutan. Oleh karena itu, Bank menerapkan sejumlah inisiatif untuk memitigasi risiko-risiko terkait penerapan keuangan berkelanjutan, sebagai berikut:

1. Bank telah memiliki Kebijakan Keuangan Berkelanjutan sebagai panduan untuk pengembangan keuangan berkelanjutan yang sesuai dengan regulasi. Kebijakan ini telah disetujui oleh Dewan Komisaris dan Direksi Bank. Secara berkala, Bank akan melakukan evaluasi dan pengkinian kebijakan internal agar tetap selaras dengan kebijakan regulator.
2. Melakukan proses penyaringan awal (*prescreening*) pada permohonan pinjaman, peningkatan portofolio pembiayaan, dan investasi untuk memastikan sesuai dengan kriteria risiko dan dampaknya terhadap lingkungan.
3. Melakukan telaah ulang atas kebijakan internal terhadap proses dan aktivitas yang sedang berjalan.
4. Menetapkan strategi implementasi keuangan berkelanjutan, khususnya pada sektor yang menjadi fokus dan potensial dalam mendukung keuangan berkelanjutan, pengembangan kapasitas internal Lembaga Jasa Keuangan (LJK) dalam kelompok usaha Sinar Mas, termasuk penyesuaian organisasi, serta manajemen risiko untuk mendukung program literasi keuangan dan inklusi keuangan.
5. Menerapkan prinsip-prinsip keuangan berkelanjutan melalui pengelolaan risiko ekonomi, sosial, dan lingkungan hidup.
6. Melakukan telaah berkala serta meninjau efektivitasnya agar memberikan manfaat, tidak hanya pada kinerja Bank, tetapi juga pada perekonomian serta lingkungan sosial dan lingkungan hidup secara umum.

Adapun informasi terkait profil dan mitigasi risiko Bank Sinarmas dapat mengacu pada bab Tata Kelola Perusahaan di Laporan Tahunan.

## RISK ASSESSMENT FOR THE IMPLEMENTATION OF SUSTAINABLE FINANCE [OJK E.3][GRI 2-25]

Bank Sinarmas realizes the potential risks in the implementation of sustainable finance. Therefore, the Bank implements a number of initiatives to mitigate risks related to the implementation of sustainable finance, as follows:

1. The Bank has established a Sustainable Financed Policy as a guideline for sustainable financial development in accordance with regulations. This policy has been approved by the Board of Commissioners and the Board of Directors of the Bank. The Bank will periodically conduct evaluations and updates of internal policies to ensure they comply with regulatory policies.
2. Conducting pre-screening processes on loan applications, financing portfolio enhancements, and investments to ensure compliance with risk criteria and their environmental impact.
3. Reviewing internal policies on ongoing processes and activities.
4. Establishing a sustainable finance implementation strategy, particularly in sectors that are the focus and potential in supporting sustainable finance, developing the internal capacity of Financial Services Institutions (LJK) within the Sinar Mas business group, including organizational adjustment and risk management to support financial literacy and financial inclusion programs.
5. Implementing sustainable finance principles through managing economic, social, and environmental risks.
6. Regularly reviewing and assessing their effectiveness to provide benefits, not only to the Bank's performance but also to the economy and the social and environmental aspects in general.

Please refer to the Corporate Governance chapter in the Annual Report for information related to Bank Sinarmas' risk profile and mitigation.

## ANTI-KORUPSI, ANTI-FRAUD, ANTI-PENCUCIAN UANG DAN PENCEGAHAN PENDANAAN TERORISME [GRI 205-2]

Bank memiliki komitmen untuk mencegah tindakan korupsi di lingkup internal maupun eksternal yang berhubungan dengan Bank. Bank telah menerapkan prinsip-prinsip anti-korupsi yang dituangkan dalam pasal-pasal pada Peraturan Perusahaan, Kode Etik, dan Pedoman Tingkah Laku. Bank telah memiliki ketentuan internal terkait anti penyuapan yang diatur pada Surat Keputusan No. SK.039/2021/Dir1-Comp tentang SOP Sistem Manajemen Anti Penyuapan.

SOP Sistem Manajemen Anti Penyuapan ini merupakan bentuk pernyataan prinsip dan komitmen Bank Sinarmas dalam mendukung praktik anti-suap di lingkungan Bank Sinarmas. Selain itu, SOP Sistem Manajemen Anti Penyuapan berfungsi sebagai informasi atau panduan oleh Manajemen, karyawan, dan/atau pihak-pihak yang bekerja untuk dan atas nama Bank Sinarmas tentang cara mengenali, memahami, menyampaikan, dan menangani masalah suap.

Kebijakan *Anti-Fraud* Bank merupakan landasan pokok penerapan strategi *Anti-fraud* melalui 4 pilar sistem pengendalian *fraud*, yaitu Pencegahan *Fraud*, Deteksi *Fraud*, Investigasi, Pelaporan dan Pengenaan Sanksi Fraud, Pemantauan, Evaluasi, serta Tindak Lanjut *Fraud*. Kerangka kerja *Anti-Fraud* Bank Sinarmas dibangun berlandaskan tata kelola perusahaan (*corporate governance*) dengan penerapan yang berfokus pada pengendalian *fraud*, budaya etika yang didukung dengan kode etik (*code of conduct*), *anti-fraud culture & awareness*, serta *whistleblowing system*.

Dalam menanamkan budaya sadar risiko (*risk culture*) dan kepedulian anti-fraud di seluruh lapisan organisasi, Bank melakukan berbagai upaya seperti Sosialisasi Tatap Muka, Pengisian Deklarasi Anti- Fraud, dan Pakta Integritas melalui aplikasi SIDILAN serta Sosialisasi melalui e-mail, media sosial, Lensa Berita, Kamis Sharing, Podcast, E-Learning Video Scorm, artikel situs web Bank Sinarmas, ATM Idle Screen, AD Desktop, dan metode lainnya. Adapun selama tahun 2024, Bank Sinarmas memiliki/tidak memiliki kasus korupsi yang melibatkan karyawan dan mitra kerja.

Bank juga berkomitmen dalam menerapkan program Anti-Pencucian Uang (APU) dan Pencegahan Pendanaan Terorisme (PPT) sebagaimana diatur dalam perundang-undangan yang berlaku dengan melakukan upaya pencegahan, pemantauan, pendeteksian, serta pelaporan terkait APU & PPT. Adapun komitmen dan kebijakan APU & PPT dapat diunduh di website Perusahaan kami melalui tautan berikut https://www.banksinarmas.com/id/informasiumum/tatakelola/apu-ppt-bank-sinarmas/

## ANTI-CORRUPTION, ANTI-FRAUD, ANTI-MONEY LAUNDERING, AND COMBATING THE FINANCING OF TERRORISM [GRI 205-2]

The Bank is committed to preventing corruption both internally and externally related to its operations. The Bank has implemented anti-corruption principles outlined in the Company Regulations, Code of Ethics, and Code of Conduct. The Bank has internal anti-bribery provisions that are governed by Decree No. SK.039/2021/Dir1-Comp on the Standard Operating Procedures for Anti-bribery Management Systems.

This SOP for the Anti-Bribery Management System is a statement of principles and Bank Sinarmas' commitment to promoting anti-bribery practices within the bank. Furthermore, the SOP of the Anti-Bribery Management System provides information or guidance to management, employees, and/or parties working for and on behalf of Bank Sinarmas on how to recognize, understand, communicate, and deal with bribery issues.

The Bank's Anti-Fraud Policy serves as the main foundation for implementing the anti-fraud strategy through four pillars of the fraud control system: fraud prevention, detection, investigation, fraud reporting and sanctioning, monitoring, evaluation, and fraud follow-up. Bank Sinarmas' Anti-Fraud Framework is founded on corporate governance, with implementation centered on fraud control, an ethical culture supported by a code of conduct, anti-fraud culture and awareness, and a whistleblowing system.

The Bank has made a variety of efforts to instill risk culture and anti-fraud awareness at all levels of the organization, including face-to-face socialization, anti-fraud declaration filling, and the Integrity Pact through the SIDILAN application, as well as socialization via e-mail, social media, News Lens, Thursday Sharing, Podcast, E-Learning Video Scorm, Bank Sinarmas website articles, ATM idle screen, AD Desktop, and other methods. There were no corruption cases involving employees or partners at Bank Sinarmas in 2024.

The Bank is also committed to implementing the Anti-Money Laundering (AML) and Countering the Financing of Terrorism (PPT) program as stipulated in the applicable legislation by carrying out prevention, monitoring, detection, and reporting efforts related to AML & PPT. The AML & PPT commitments and policies can be downloaded on our Company website via the following link https://www.banksinarmas.com/id/informasiumum/tatakelola/apu-ppt-bank-sinarmas/

## TANTANGAN DAN PERMASALAHAN DALAM PENERAPAN KEUANGAN BERKELANJUTAN

[OJK E.5]

Dalam perjalanan menuju penerapan keuangan berkelanjutan, Bank Sinarmas berkomitmen untuk menyeimbangkan pertumbuhan bisnis dengan tanggung jawab lingkungan dan sosial. Namun, penerapan keuangan berkelanjutan dihadapkan pada berbagai tantangan yang kompleks, baik dari segi regulasi, biaya, hingga pemahaman publik yang masih terbatas. Berikut adalah beberapa tantangan dalam penerapan keuangan berkelanjutan:

1. Perkembangan Infrastruktur dan Teknologi
   Keuangan berkelanjutan sering memerlukan teknologi mutakhir, terutama dalam sistem pelacakan emisi karbon dan analisis risiko iklim. Bank Sinarmas mungkin menghadapi tantangan dalam investasi teknologi hijau ini, terutama jika belum ada infrastruktur atau sistem yang mendukung pelaksanaan keuangan berkelanjutan secara optimal.

2. Tantangan Regulasi, Kepatuhan, dan Standar Global
   Regulasi dan standar mengenai keuangan berkelanjutan terus berkembang serta memiliki kriteria yang dapat berubah. Hal ini memerlukan penyesuaian bagi Bank Sinarmas agar proses dan produk keuangan berkelanjutan dapat sejalan dengan regulasi dan standar yang terbaru.

3. Tantangan untuk Meningkatkan Pemahaman dan Kesadaran Publik
   Keuangan berkelanjutan masih merupakan konsep yang relatif baru bagi sebagian nasabah dan publik di Indonesia. Banyak nasabah yang belum sepenuhnya memahami manfaat dari produk keuangan berkelanjutan atau menganggap investasi dalam keuangan berkelanjutan lebih berisiko. Edukasi publik menjadi penting, namun ini membutuhkan sumber daya dan waktu yang tidak sedikit.

4. Biaya Implementasi yang Tinggi
   Program keuangan berkelanjutan memerlukan biaya investasi yang tinggi seperti investasi pada proyek hijau, pengembangan portofolio ramah lingkungan, hingga pelatihan sumber daya manusia untuk memahami *Environmental, Social, Governance* (ESG).

Dengan mengidentifikasi dan memahami tantangan ini, Bank Sinarmas dapat merancang strategi yang lebih efektif dalam mencapai keberlanjutan, memastikan bahwa seluruh inisiatif tidak hanya memberikan nilai tambah bagi nasabah, tetapi juga mendukung pembangunan yang berwawasan lingkungan dan sosial di Indonesia.

## CHALLENGES AND ISSUES IN SUSTAINABLE FINANCE IMPLEMENTATION

[OJK E.5]

In the journey towards implementing sustainable finance, Bank Sinarmas is committed to balancing business growth with environmental and social responsibility. However, the implementation of sustainable finance is faced with various complex challenges, both in terms of regulations, costs, and limited public understanding. The following are several challenges in the implementation of sustainable finance:

1. Infrastructure and Technology Development
   Sustainable finance often requires cutting-edge technology, especially in carbon emission tracking systems and climate risk analysis. Bank Sinarmas may face challenges in investing in these green technologies, especially if there is no infrastructure or system that supports the implementation of sustainable finance optimally.

2. Global Regulatory, Compliance, and Standards Challenges
   Regulations and standards regarding sustainable finance are constantly evolving and have criteria that may change. It requires adjustments for Bank Sinarmas so that sustainable finance processes and products can be in line with the latest regulations and standards.

3. Challenges to Increase Public Understanding and Awareness
   Sustainable finance is still a relatively new concept for some customers and the public in Indonesia. Many customers do not fully understand the benefits of sustainable finance products or perceive investments in sustainable finance as riskier. Public education is important, but this requires significant resources and time.

4. High Cost of Implementation
   Sustainable finance programs require high investment costs, such as investing in green projects, developing environmentally friendly portfolios, and training human resources to understand Environmental, Social, and Governance (ESG).

By identifying and understanding these challenges, Bank Sinarmas can design more effective strategies for achieving sustainability, ensuring that all initiatives not only provide added value for customers but also support environmentally and socially sound development in Indonesia.

## KEPATUHAN TERHADAP HUKUM DAN PERATURAN [GRI 2-27]

Selama tahun 2024, Bank tidak memiliki permasalahan hukum yang berdampak pada kerugian finansial terkait isu sosial dan lingkungan. Bank terus berupaya mengikuti seluruh peraturan yang berlaku dan mengadopsi peraturan-peraturan yang telah diperbarui.

## MENINGKATKAN BUDAYA KEBERLANJUTAN [OJK F.1]

Bank Sinarmas memiliki komitmen yang kuat dalam menginternalisasi budaya keberlanjutan ke dalam setiap level organisasi, serta menjadikannya sebagai bagian dari identitas dan nilai perusahaan. Melalui budaya keberlanjutan ini, Bank Sinarmas berupaya membangun kesadaran kolektif mengenai pentingnya tanggung jawab sosial dan lingkungan, serta mengintegrasikan prinsip-prinsip keberlanjutan dalam seluruh proses bisnis.

*Human Capital Management Group* secara aktif melakukan sosialisasi dan edukasi kepada seluruh karyawan dengan memanfaatkan berbagai sarana yang tersedia, seperti penyediaan anggaran, platform *e-learning*, serta platform virtual seperti, Zoom. Di sisi normatif, Bank meningkatkan akuntabilitas dalam semua fungsi organisasi melalui perumusan dan penerapan strategi kepatuhan, *anti-fraud, risk awareness*, GCG, dan keamanan data. Kegiatan ini merupakan bagian integral dari proses penerapan Budaya Keberlanjutan di lingkungan Bank.

Bank Sinarmas juga menerapkan Budaya Keberlanjutan dalam kegiatan operasional melalui upaya penghematan dalam penggunaan kertas, air, listrik, dan bahan bakar. Kebijakan ini diterapkan secara menyeluruh di seluruh jenjang organisasi, mulai dari kantor pusat hingga kantor cabang, dengan harapan memberikan dampak positif terhadap lingkungan.

Dengan membangun budaya keberlanjutan ini, Bank Sinarmas tidak hanya berfokus pada pencapaian tujuan bisnis jangka panjang, tetapi juga memberikan kontribusi yang nyata terhadap pembangunan berkelanjutan di Indonesia.

## COMPLIANCE WITH LAWS AND REGULATIONS [GRI 2-27]

During 2024, the Bank had no legal issues related to social and environmental issues that resulted in financial losses. The Bank continues to comply with all applicable regulations and adopt updated regulations.

## ENHANCING SUSTAINABILITY CULTURE [OJK F.1]

Bank Sinarmas has a strong commitment to internalizing sustainability culture into every level of the organization, as well as making it part of the Company's identity and values. Through this sustainability culture, Bank Sinarmas strives to build collective awareness on the importance of social and environmental responsibility, as well as to integrate sustainability principles in all business processes.

The Human Capital Management Group actively conducts socialization and education for all employees by utilizing various available means, such as budget provision, e-learning platforms, and virtual platforms such as Zoom. On the normative side, the Bank enhances accountability in all organizational functions through the formulation and implementation of compliance, anti-fraud, risk awareness, GCG, and data security strategies. These activities are an integral part of the process of implementing a Sustainability Culture within the Bank.

Bank Sinarmas also implements a Sustainability Culture in operational activities through savings efforts in paper, water, electricity, and fuel usage. This policy is applied thoroughly at all levels of the organization, from the head office to branch offices, with the hope of having a positive impact on the environment.

By building this culture of sustainability, Bank Sinarmas not only focuses on achieving long-term business goals but also makes a real contribution to sustainable development in Indonesia.

# MENGEMBANGKAN KOMPETENSI SUMBER DAYA MANUSIA
## Developing Human Resources Competence



### MENGEMBANGKAN KOMPETENSI SUMBER DAYA MANUSIA

Bank Sinarmas memiliki komitmen untuk mengembangkan kompetensi Sumber Daya Manusia (SDM) serta memberikan lingkungan kerja yang aman, layak, nyaman, inklusi, dan kondusif. Bank juga menjunjung tinggi praktik ketenagakerjaan yang baik dengan berkomitmen pada prinsip kesetaraan dan kesempatan yang sama kepada setiap karyawan.

### PRAKTIK KETENAGAKERJAAN

Dalam mengelola praktik ketenagakerjaan, Bank Sinarmas menunjuk Human Capital Management (HCM) Group dengan tetap memperhatikan prinsip keuangan berkelanjutan. Bank menyadari pentingnya menyelaraskan berbagai kebijakan dan keputusan mengenai pengelolaan SDM dengan mempertimbangkan dampak sosial, lingkungan, dan ekonomi karyawan.

#### Kesetaraan Gender dan Kesempatan Kerja

[OJK F.18]

Bank Sinarmas berkomitmen untuk memberikan perlakuan yang adil dan setara kepada seluruh karyawan, tanpa diskriminasi berdasarkan gender, suku, agama, ras, atau golongan (SARA). Prinsip kesetaraan ini diterapkan secara konsisten mulai dari proses rekrutmen, pengembangan kompetensi, hingga pemberian peluang karier.

### DEVELOPING HUMAN RESOURCES COMPETENCE

Bank Sinarmas is committed to developing the competence of Human Resources (HR) and providing a safe, decent, comfortable, inclusive, and conducive work environment. The Bank also upholds healthy labor practices by committing to equality and equal opportunity for every employee.

### EMPLOYMENT PRACTICES

In managing employment practices, Bank Sinarmas appoints the Human Capital Management (HCM) Group, keeping in mind the principles of sustainable finance. The Bank realizes the importance of aligning various HR management policies and decisions by considering employees' social, environmental, and economic impacts.

#### Gender Equality and Employment Opportunities

[OJK F.18]

Bank Sinarmas is committed to providing fair and equal treatment to all employees without discrimination based on gender, ethnicity, religion, race, or class (SARA). This principle of equality is consistently applied from the recruitment process to competency development to the provision of career opportunities.



Sepanjang tahun 2024, Bank Sinarmas telah merekrut **1.375** karyawan baru. Proses rekrutmen dijalankan secara profesional dan tanpa diskriminasi, dimana seluruh kandidat karyawan dievaluasi dan dinilai berdasarkan kompetensi dan pengalaman yang relevan. Bank memastikan bahwa setiap keputusan rekrutmen dilaksanakan tanpa bias dan didasari oleh faktor-faktor yang berkaitan dengan kemampuan kerja mereka.

Peluang kerja yang sama juga diberikan oleh perusahaan dengan menerapkan prinsip kesetaraan gender kepada calon karyawan wanita. Bank Sinarmas memastikan bahwa posisi dan jabatan yang tersedia terbuka bagi mereka yang memenuhi kualifikasi tanpa terkecuali. Hal ini tercermin dengan beberapa diantara karyawan wanita menduduki jabatan strategis, seperti Dewan Komisaris, Direksi dan Pejabat Eksekutif. Adapun per tanggal 31 Desember 2024, komposisi karyawan wanita di Bank adalah sebesar **50,7**%.

Dalam mewujudkan komitmen untuk menciptakan lingkungan kerja yang inklusif serta adil dan setara, Bank Sinarmas juga memberikan kesempatan khusus bagi penyandang disabilitas dan memastikan penempatan mereka pada posisi yang sesuai dengan kemampuan dan keadaan yang disesuaikan.

### Tenaga Kerja Paksa dan Tenaga Kerja Anak [OJK F.19]

Sebagai pemenuhan Undang Undang No. 19 Tahun 1999 tentang Pengesahan Konvensi International Labour Organization (ILO) mengenai Penghapusan Kerja Paksa, Bank senantiasa memastikan waktu kerja yang layak bagi karyawan, dengan membatasi waktu kerja maksimal hingga 40 jam dalam seminggu.

Bank Sinarmas juga telah menetapkan batas usia karyawan yang layak bekerja, yakni usia 18 tahun. Hal ini sejalan dengan ketentuan Pasal 68 Undang-Undang No. 13 Tahun 2003 tentang Ketenagakerjaan. Hal ini memastikan bahwa Bank tidak memperkerjakan karyawan di bawah umur seperti yang tertera dalam undang-undang.

### Remunerasi dan Manfaat bagi Karyawan [OJK F.20]

Bank Sinarmas merumuskan kebijakan remunerasi yang dirancang untuk menjunjung prinsip keadilan dan kewajaran. Penetapan kebijakan ini mempertimbangkan berbagai faktor, termasuk kontribusi individu karyawan, daya saing industri, serta kemampuan perusahaan.

Bank mengikuti program *salary survey* yang difasilitasi oleh konsultan independen yang diakui dalam industri perbankan, demi mendapatkan referensi dalam penyusunan struktur upah karyawan. Hasil dari survei ini menjadi referensi utama dalam penyusunan struktur upah karyawan, selain mempertimbangkan kajian internal yang mengacu pada praktik terbaik di industri.

Throughout 2024, Bank Sinarmas has recruited **1,375** new employees. The recruitment process was run professionally and without discrimination, where all employee candidates were evaluated and assessed based on relevant competencies and experience. The Bank ensured that every hiring decision was made without bias and based it on factors related to candidates' employability.

The company also provides equal employment opportunities by applying the principle of gender equality to prospective female employees. Bank Sinarmas ensures that the available positions and titles are open to those who meet the qualifications without exception. The policy is reflected in appointing some female employees to strategic positions, such as the Board of Commissioners, Board of Directors, and Executive Officers. As of December 31, 2024, the composition of female employees in the Bank is **50.7**%.

Realizing its commitment to creating an inclusive, fair, and equal work environment, Bank Sinarmas also provides special opportunities for persons with disabilities and ensures their placement in positions that are in accordance with their abilities and adjusted circumstances.

### Forced Labor and Child Labor [OJK F.19]

As a fulfillment of Law No. 19 of 1999 on the Ratification of the International Labor Organization (ILO) Convention on the Abolition of Forced Labor, the Bank always ensures decent working time for employees by limiting the maximum working time to 40 hours a week.

Bank Sinarmas has also set the age limit for eligible employees to work at 18. The limit is in line with the provisions of Article 68 of Law No. 13 Year 2003 on Manpower and ensures that the Bank does not employ underage employees as stated in the law.

### Remuneration and Benefits for Employees [OJK F.20]

Bank Sinarmas formulates a remuneration policy designed to uphold the principles of fairness and reasonableness. This policy is determined by various factors, including individual employee contributions, industry competitiveness, and company capabilities.

The Bank participates in a salary survey program facilitated by an independent consultant recognized in the banking industry to obtain references in preparing the employee wage structure. The results of this survey become the main reference, in addition to considering internal studies that refer to best practices in the industry.

Selain itu, Bank juga mempertimbangkan kajian internal yang mengacu pada praktik terbaik di industri perbankan serta memastikan kebijakan remunerasi mematuhi seluruh ketentuan perundang-undangan yang berlaku, termasuk standar upah minimum yang ditetapkan oleh pemerintah.

In addition, the Bank considers internal studies that refer to best practices in the banking industry and ensures that remuneration policies comply with all applicable laws and regulations, including government minimum wage standards.

### Rasio Penghasilan Karyawan Terendah terhadap Upah Minimum
**Ratio of Lowest Employee Earnings to Minimum Wage**

| Provinsi | Persentase terhadap UMP<br>Percentage of Provincial Minimum Wage | Province |
|---|---|---|
| Bali | 105% | Bali |
| Bangka Belitung | 104% | Bangka Belitung |
| Banten | 158% | Banten |
| Bengkulu | 152% | Bengkulu |
| DI Yogyakarta | 133% | DI Yogyakarta |
| DKI Jakarta | 110% | DKI Jakarta |
| Gorontalo | 113% | Gorontalo |
| Jambi | 113% | Jambi |
| Jawa Barat | 112% | West Java |
| Jawa Tengah | 112% | Central Java |
| Jawa Timur | 108% | East Java |
| Kalimantan Barat | 116% | West Kalimantan |
| Kalimantan Selatan | 110% | South Kalimantan |
| Kalimantan Tengah | 109% | Central Kalimantan |
| Kalimantan Timur | 108% | East Kalimantan |
| Kalimantan Utara | 137% | North Kalimantan |
| Kepulauan Riau | 105% | Riau Islands |
| Lampung | 111% | Lampung |
| Maluku | 112% | Maluku |
| Maluku Utara | 112% | North Maluku |
| NTB | 104% | West Nusa Tenggara |
| NTT | 107% | East Nusa Tenggara |
| Papua | 110% | Papua |
| Papua Barat | 110% | West Papua |
| Papua Barat Daya | 125% | Southwest Papua |
| Papua Selatan | 104% | South Papua |
| Papua Tengah | 110% | Central Papua |
| Riau | 108% | Riau |
| Sulawesi Barat | 104% | West Sulawesi |
| Sulawesi Selatan | 110% | South Sulawesi |
| Sulawesi Tengah | 121% | Central Sulawesi |
| Sulawesi Tenggara | 104% | Southeast Sulawesi |
| Sulawesi Utara | 110% | North Sulawesi |
| Sumatera Barat | 107% | West Sumatra |
| Sumatera Selatan | 104% | South Sumatra |
| Sumatera Utara | 110% | North Sumatra |

Bank memberikan manfaat lain selain remunerasi bagi karyawan sesuai dengan status masing-masing. Hal ini mencakup rawat inap, rawat jalan, biaya melahirkan bagi karyawati dan istri karyawan, dan juga pergantian kacamata untuk karyawan/karyawati dengan limit yang disesuaikan

The Bank provides benefits other than employee remuneration according to their respective status. These include hospitalization, outpatient care, maternity expenses for employees and employees' wives, and eyeglasses replacement for employees with limits adjusted by the Bank.

oleh Bank. Bank turut menyediakan pemeliharaan kesehatan melalui program Badan Penyelenggara Jaminan Sosial (BPJS) bagi yang berstatus tenaga alih daya (*outsourcing*).

## LINGKUNGAN KERJA YANG LAYAK DAN KONDUSIF [OJK F.21]

Bank Sinarmas berupaya melakukan sejumlah inisiatif untuk memastikan keselamatan dan kesehatan karyawan. Komitmen untuk menerapkan praktik terbaik dalam pemenuhan hak-hak karyawan dengan memprioritaskan prinsip-prinsip keselamatan dan kesehatan kerja (K3) ini guna menciptakan lingkungan kerja yang layak dan kondusif.

Melalui unit *Business Resilience & Continuity Management*, Bank berkomunikasi dengan karyawan melalui berbagai saluran, termasuk *e-mail* dan *e-learning*, demi meningkatkan kesadaran dan pengetahuan tentang K3 serta keadaan darurat. Bank telah mengupayakan beberapa sarana pengamanan, seperti alat pemadam api ringan (APAR) dan alarm pada infrastruktur gedung kantor bank sebagai tindakan pencegahan. Bank juga mendukung ibu pekerja dengan menyediakan ruang laktasi yang nyaman dan bersih.

Dalam rangka memastikan terpenuhinya hak karyawan terkait kesehatan, Bank telah menyediakan fasilitas kesehatan karyawan, sesuai dengan Surat Keputusan Direksi No.SK.090/2024/PRESDIR-HCM tentang Petunjuk Pelaksanaan Fasilitas Kesehatan Bagi Karyawan. Adapun beberapa fasilitas kesehatan karyawan antara lain:

- BPJS Kesehatan
- Asuransi Kesehatan

Selain itu, Bank juga memastikan keselamatan kerja karyawan melalui pembentukan Tim Darurat yang bertanggung jawab terhadap keselamatan kerja. Tujuan dibentuknya tim ini adalah:

1. Mengetahui kegiatan yang harus diprioritaskan pada saat terjadi keadaan darurat demi kelangsungan bisnis dan pelayanan terhadap nasabah;
2. Meminimalkan kehilangan dokumen-dokumen penting; dan
3. Meminimalkan dampak bencana terhadap perusahaan secara keseluruhan. Tim Darurat pun senantiasa diberikan pelatihan dan pelatihan dan simulasi menghadapi bencana, baik kebakaran maupun gempa bumi.

Tujuan dari pelatihan tersebut, yakni:

1. Meningkatkan kesadaran dan kesiapan menghadapi bencana;
2. Memberikan pemahaman mengenai *basic floor captain*; dan
3. Melatih kemampuan dan kesigapan para peserta pelatihan dalam mengoordinasi rekan-rekan kerjanya untuk melakukan proses evakuasi saat gempa dan kebakaran pada gedung bertingkat.

The Bank also provides health care through the Social Security Agency for Health (BPJS) program for those with outsourcing status.

## PROPER AND CONDUCIVE WORKING ENVIRONMENT [OJK F.21]

Bank Sinarmas endeavors to conduct several initiatives to ensure the safety and health of employees. The commitment to implement best practices in fulfilling employees' rights by prioritizing the principles of occupational safety and health (K3) is to create a decent and conducive working environment.

Through the Business Resilience & Continuity Management unit, the Bank communicates with employees through various channels, including e-mail and e-learning, to increase awareness and knowledge of OHS and emergencies. The Bank has also implemented several security measures, such as light fire extinguishers (APAR) and alarms on the infrastructure of the Bank's office buildings. The Bank also supports working mothers by providing comfortable and clean lactation rooms.

To ensure the fulfillment of employee rights related to health, the Bank has provided employee health facilities by the Decree of the Board of Directors No.SK.090/2024/PRESDIR-HCM on the Implementation Guidelines for Health Facilities for Employees. Some of the employee health facilities include:

- BPJS Health
- Health Insurance

In addition, the Bank also ensures employee work safety through the establishment of an Emergency Team responsible for work safety. The objectives of this team are:

1. Knowing the activities that must be prioritized in the event of an emergency for business continuity and customer service;
2. Minimize the loss of essential documents; and
3. Minimizing the impact of disasters on the company as a whole. The Emergency Team is constantly provided with training and simulations for fires and earthquakes.

The objectives of the training are:

1. Increase awareness and readiness to face disasters;
2. Provide an understanding of the essential floor captain; and
3. Train the trainees' ability and alertness in coordinating with their coworkers to evacuate during earthquakes and fires in high-rise buildings.

Demi melatih kesadaran, kesiapan, dan kesiapsiagaan karyawan dalam menghadapi keadaan darurat kebakaran, Bank juga melakukan simulasi kebakaran termasuk di dalamnya untuk mengetahui jalur evakuasi, pintu *emergency exit* hingga lokasi titik kumpul yang telah ditentukan.

Bank Sinarmas menyadari peran penting tenaga keamanan (sekuriti) dalam pelaksaan keselamatan kerja. Untuk itu, Bank Sinarmas telah mengikutsertakan tim keamanan pada beberapa pelatihan, dengan tujuan:

1. Meningkatkan kemampuan, kesigapan, dan sikap mental dari personel Sekuriti Bank Sinarmas dalam merespons secara tepat dan cepat saat keadaan darurat terjadi;
2. Melatih dan meningkatkan kemampuan peserta dalam evakuasi mandiri kebakaran dan evakuasi korban gedung runtuh; dan
3. Memberikan pemahaman lanjutan tentang sistem koordinasi *Incident Command System* (ICS) dalam menangani situasi keadaan darurat di lingkungan kantor

Sepanjang tahun 2024, berbagai upaya untuk meningkatkan kualitas keselamatan kerja telah dilaksanakan sebagai berikut:

1. Bekerja sama dengan Task Force Spin off USS dalam melengkapi beberapa dokumen, seperti Kebijakan BCM, Petunjuk Pelaksana Lokasi Kerja Alternatif, SOP Lokasi Kerja Alternatif, Petunjuk Pelaksana Rencana Tindak Darurat, dan Petunjuk Pelaksana Risk Assessment Bank sebagai prasyarat dokumen yang diminta oleh regulator.
2. Melaksanakan uji coba BC Plan
3. Melaksanakan uji coba jalur komunikasi yang melibatkan pimpinan unit kerja kritikal yang ada di kantor pusat serta pejabat Regional Operation Manager, Head of Operation, dan/atau Supervisor di kantor cabang.
4. Melakukan simulasi dan evakuasi bencana kebakaran.
5. Melakukan sosialisasi dengan mempergunakan media Sidilan kepada seluruh cabang dengan jabatan Head Of Operation, Supervisor, Sub Branch Service Manager, Customer Sales Service Officer, Teller, dan Security melakukan ujian tes kemampuan yang berkaitan dengan Petunjuk Pelaksanaan Rencana Tindakan Darurat (Rev. 3.0) dan Kebijakan BCM (Rev 5.0)
6. Melakukan sosialisasi ketentuan Petunjuk Pelaksanaan Rencana Tindak Darurat (Rev. 3.0) menggunakan media Sidilan untuk seluruh karyawan
7. Seluruh kantor cabang menjalankan simulasi dan evakuasi dari bencana alam gempa bumi.
8. Membuat acara webinar dengan tema Tanggap Darurat untuk seluruh kantor cabang.

## PENGEMBANGAN KOMPETENSI [OJK F.22][GRI 404-1][GRI 404-2]

Pengembangan kompetensi SDM menjadi salah satu komitmen utama Bank Sinarmas. Dalam mewujudkan komitmen tersebut, Bank telah menyelenggarakan pelatihan pengembangan kompetensi kepada karyawan pada berbagai jenjang jabatan. Kegiatan yang berada dibawah

The Bank also conducts fire simulations, including the evacuation routes, emergency exit doors, and the location of the designated gathering points, to train the employees' awareness, readiness, and preparedness for dealing with fire emergencies.

Bank Sinarmas realizes the critical role of security personnel in implementing work safety. Therefore, Bank Sinarmas has participated with the security team in several trainings, with the following objectives:

1. Improving the ability, readiness, and mental attitude of Bank Sinarmas' security personnel in responding appropriately and quickly when an emergency occurs;
2. To train and improve the ability of participants in fire self-evacuation and evacuation of victims of building collapse and
3. Providing further understanding of the Incident Command System (ICS) coordination system in handling emergency situations in the office environment.

Throughout 2024, the company has implemented various efforts to improve the quality of work safety as follows:

1. Collaborated with the USS Spin-off Task Force in completing several documents, such as the BCM Policy, Alternative Work Location Implementation Manual, Alternative Work Location SOP, Emergency Action Plan Implementation Manual, and Bank Risk Assessment Implementation Manual, as prerequisite documents requested by regulators.
2. Conduct a BC Plan pilot test
3. Conduct a trial of communication channels involving leaders of critical work units at the head office and Regional Operation Manager, Head of Operation, and/or Supervisor officials at branch offices.
4. Conduct fire disaster simulation and evacuation.
5. Conduct socialization using Sidilan media to all branches with the positions of Head of Operation, Supervisor, Sub Branch Service Manager, Customer Sales Service Officer, Teller, and Security to conduct a proficiency test related to the Emergency Action Plan Implementation Guidelines (Rev. 3.0) and BCM Policy (Rev. 5.0).
6. Conduct socialization of the provisions of the Emergency Action Plan Implementation Guidelines (Rev. 3.0) using Sidilan media for all employees.
7. All branch offices conducted simulations and evacuations from natural disasters like earthquakes.
8. Creating a webinar event with the theme of Emergency Response for all branch offices.

## COMPETENCY DEVELOPMENT [OJK F.22][GRI 404-1][GRI 404-2]

HR competency development is one of Bank Sinarmas' main commitments. In realizing this commitment, the Bank has organized competency development training for employees at various levels of positions. The activities under the responsibility of HCM have been conducted through

tanggung jawab HCM telah direalisasikan melalui *metode e-learning* maupun *in-class*. Bank juga bekerja sama dengan pihak eksternal untuk memberikan pelatihan maupun webinar terkait keuangan berkelanjutan

e-learning and in-class methods. The Bank also cooperates with external parties to provide training and webinars related to sustainable finance.

Beberapa program pengembangan kompetensi lain, seperti pelatihan untuk kebutuhan promosi jabatan atau menduduki jabatan tertentu, pelatihan wajib (sertifikasi) bagi karyawan juga telah dilaksanakan pada tahun 2024. Adapun jumlah jam pelatihan yang diikuti oleh seluruh karyawan organik atau di bawah Bank Sinarmas sepanjang tahun 2024 adalah sebesar 445.707,52 jam dengan rata-rata sekitar 91,48 jam/karyawan.

Several other competency development programs, like training for promotion or occupying certain positions and mandatory employee training (certification), were also implemented in 2024. The number of training hours attended by all employees, organic or under Bank Sinarmas, throughout 2024 amounted to 445,707.52 hours, with an average of around 91.48 hours per employee.

**445.707,52**
**Jam | Hour**
Jumlah Jam Pelatihan Karyawan Bank Sinarmas 2024
Total Training Hours of Bank Sinarmas Employees 2024

**91,48**
**Jam/Karyawan | Hour/Employee**
Rata-rata Jam Pelatihan Per Karyawan Tahun 2024
Average Training Hours Per Employee in 2024

### Jam Pelatihan Berdasarkan Jenis Kelamin
**Training Hours by Gender**

| Jenis Kelamin<br>Gender | Jumlah Karyawan yang Memperoleh Pelatihan<br>Number of Employees Receiving Training | Jam Pelatihan<br>Training Hours | Rata-rata Jam Pelatihan<br>Average Training Hours |
|---|---|---|---|
| Laki-laki \| Male | 2.398 | 210.155,13 | 87,64 |
| Perempuan \| Female | 2.474 | 235.552,39 | 95,21 |

### Jam Pelatihan Berdasarkan Level Jabatan
**Training Hours by Position Level**

| Level Jabatan<br>Level of Position | Jumlah Karyawan yang Memperoleh Pelatihan<br>Number of Employees Receiving Training | Jam Pelatihan<br>Training Hours | Rata-rata Jam Pelatihan<br>Average Training Hours |
|---|---|---|---|
| *Top Management* | 53 | 5.632,5 | 106,27 |
| *Middle Management* | 795 | 83.878,7 | 105,51 |
| *Firstline Management* | 1.548 | 157.844,79 | 101,97 |
| Staf \| Staff | 2.461 | 197.472,03 | 80,24 |
| Non-staf \| Non-staff | 15 | 879,5 | 58,63 |

## PELIBATAN PIHAK LOKAL

Dalam rangka mewujudkan kesejahteraan ekonomi masyarakat dan memberikan dampak ekonomi tidak langsung, Bank Sinarmas berkomitmen untuk melibatkan tenaga kerja lokal dalam kegiatan usaha yang dijalankan. Tenaga kerja lokal yang dimaksud yaitu tenaga kerja yang berasal dari sekitar wilayah operasional Bank. Upaya untuk meningkatkan pelibatan pihak lokal ini terkait dengan keuangan berkelanjutan melalui layanan keuangan tanpa kantor dalam rangka keuangan inklusi (Laku Pandai) yang berjalan sejak akhir 2015.

## INVOLVEMENT OF LOCAL PARTIES

To realize the community's economic welfare and provide an indirect economic impact, Bank Sinarmas is committed to involving local labor in business activities. The local workforce is the workforce from around the Bank's operational areas. The effort to increase the involvement of local parties is related to sustainable finance through branchless financial services in the framework of financial inclusion (Laku Pandai), which has been running since the end of 2015.

Bank mengupayakan layanan perbankan dapat tetap dinikmati masyarakat terutama di daerah pedesaan melalui Agen Laku Pandai, sehingga masyarakat dapat melakukan transaksi keuangan, seperti menabung, menarik tunai, transfer dana, hingga membeli pulsa dan membayar berbagai tagihan secara cepat dan aman di agen-agen Laku Pandai.

Hingga akhir 2024, Bank Sinarmas telah bekerja sama dengan lebih dari 9.695 agen Laku Pandai yang tersebar di 165 kota dan kabupaten di seluruh Indonesia.

The Bank strives for banking services to continue to be enjoyed by the community, especially in rural areas, through Laku Pandai Agents. This allows the community to conduct financial transactions, such as saving, withdrawing cash, transferring funds, buying credit, and paying various bills, quickly and safely at Laku Pandai agents.

Until the end of 2024, Bank Sinarmas collaborated with more than 9,695 Laku Pandai agents in 165 cities and regions throughout Indonesia.



**9.695**

**Mitra** | **Partners**

Agen Laku Pandai yang Menjadi Mitra Lokal

Laku Pandai Agents who Become Local Partners

# MENINGKATKAN KEPEDULIAN SOSIAL DAN PENGEMBANGAN MASYARAKAT

## Improving Social Care and Community Development

Sebagai bagian dari komitmen untuk menciptakan dampak positif yang berkelanjutan, Bank Sinarmas terus berkontribusi dalam pemberdayaan masyarakat melalui berbagai program yang terarah dan berkelanjutan. Fokus kami adalah mendorong literasi dan inklusi keuangan, meningkatkan kualitas pendidikan, serta mendukung kesejahteraan sosial melalui kegiatan-kegiatan di bidang kesehatan, keagamaan, sarana dan prasarana sosial, hingga filantropi.

### DAMPAK OPERASIONAL [OJK F.23][GRI 413-2]

Kegiatan operasional perbankan Bank Sinarmas tidak memiliki dampak negatif langsung kepada masyarakat sekitar. Meski demikian, Bank berupaya memberikan kontribusi positif kepada masyarakat, terutama di wilayah operasionalnya, melalui berbagai inisiatif pengembangan sosial dan kemasyarakatan.

### LITERASI DAN INKLUSI KEUANGAN

[OJK F.25][GRI 413-1]

Bank Sinarmas menyadari pentingnya literasi dan inklusi keuangan masyarakat di Indonesia. Demi menciptakan masa depan keuangan yang stabil dan berkelanjutan, baik bagi individu maupun masyarakat secara keseluruhan, Bank berupaya menginisiasi berbagai program literasi keuangan. Bank juga memastikan akses yang lebih merata terhadap produk dan layanan keuangan melalui Inovasi digital dan teknologi informasi.

Sepanjang tahun 2024, program dan kegiatan literasi dan inklusi keuangan telah dilaksanakan salah satunya bekerja sama dengan Taman Baca Masyarakat (TBM) Lentera Pusaka.

As part of the commitment to creating a sustainable positive impact, Bank Sinarmas continues to contribute to community empowerment through various targeted and sustainable programs. Our focus is to encourage financial literacy and inclusion, improve the quality of education, and support social welfare through activities in health, religion, social facilities and infrastructure, and philanthropy.

### IMPACT OF OPERATIONS [OJK F.23][GRI 413-2]

Bank Sinarmas' banking operations have no direct negative impact on the surrounding community. Nevertheless, the Bank strives to contribute positively to the community, especially in its operational areas, through various social and community development initiatives.

### FINANCIAL LITERACY AND INCLUSION

[OJK F.25][GRI 413-1]

Bank Sinarmas realizes the importance of financial literacy and inclusion in Indonesia. In order to create a stable and sustainable financial future, both for individuals and society as a whole, the Bank strives to initiate various financial literacy programs. The Bank also ensures more equitable access to financial products and services through digital innovation and information technology.

Throughout 2024, financial literacy and inclusion programs and activities have been implemented, one of which was in collaboration with Community Reading Park (TBM) Lentera Pusaka.




### Tabungan SIMPEL untuk Meningkatkan Kualitas Pendidikan Anak-anak Indonesia

Bank Sinarmas meluncurkan Tabungan SIMPEL (SIMpenan PELajar) untuk 20 anak pembaca aktif TBM Lentera Pustaka di Bogor pada tangagal 18 Februari 2024. Pada saat yang sama dilakukan pula peresmian kanopi rooftop baca, penyerahan tas sekolah Tzu Chi, donasi 5 perangkat komputer literasi digital, dan peluncuran motor baca SIMOBI. Kegiatan yang dihadiri 140 anak pembaca aktif dan ibunya ini menjadi bukti kepedulian sosial Bank Sinarmas dalam mendukung gerakan literasi dan aktivitas taman bacaan.

### Gelar Festival Literasi Gunung Salak untuk Tingkatkan Kampanye Ayo Baca

Bank Sinarmas bersinergi dengan TBM Lentera Pustaka mengadakan Festival Literasi Gunung Salak #7 di, Bogor, Jawa Barat. Festival ini merupakan ajang kreasi anak-anak pembaca aktif dan membangun kecintaan budaya Indonesia melalui literasi yang diselenggarakan pada tanggal 24 November 2024. Ke depan, Bank Sianrmas akan terus mendukung aktivitas TBM Lentera Pustaka, termasuk untuk memperkuat literasi finansial anak-anak dan pembukaaan rekening SimPel.

## PENDIDIKAN [OJK F.25][GRI 413-1]

Bank Sinarmas melakukan beberapa kerja sama dengan berbagai pihak guna mendukung program pemerintah dalam meningkatkan mutu pendidikan. Salah satunya adalah dengan berkolaborasi dengan Taman Bacaan Masyarakat (TBM) Lentera Pustaka yang telah dilaksanakan sejak tahun 2018. Kegiatan ini bertujuan untuk menekan angka putus sekolah dan pernikahan dini serta meningkatkan kegemaran

### SIMPEL Savings to Enhance the Quality of Education of Indonesian Children

Bank Sinarmas launched SIMPEL Savings (Student Savings) for 20 active readers of TBM Lentera Pustaka in Bogor on February 18, 2024. At the same time, the inauguration of the rooftop reading canopy, the handover of Tzu Chi school bags, the donation of five digital literacy computer devices, and the launch of the SIMOBI reading motorcycle were also held. The activity, which was attended by 140 active reader children and their mothers, is proof of Bank Sinarmas' social concern in supporting the literacy movement and reading park activities.

### Literacy Festival Held at Gunung Salak to Improve the Let's Read Campaign

Bank Sinarmas, in synergy with TBM Lentera Pustaka, held the Gunung Salak Literacy Festival #7 in Bogor, West Java. This festival is an event for children to create active readers and build a love for Indonesian culture through literacy, held on November 24, 2024. Going forward, Bank Sianrmas will continue to support the activities of TBM Lentera Pustaka, including strengthening children's financial literacy and opening SimPel accounts.

## EDUCATION [OJK F.25][GRI 413-1]

Bank Sinarmas conducts several collaborations with various parties to support the government program in improving the quality of education. One of them is by collaborating with the Community Reading Park (TBM) Lentera Pustaka which has been implemented since 2018. This activity aims to reduce the number of school dropouts and early marriages and increase the reading habit of school-age children in villages

membaca anak-anak usia sekolah di perkampungan dan pelosok daerah. Kolaborasi Bank dengan TBM Lentera Pustaka telah berjalan sesuai dengan jalur dan memberikan dampak positif kepada masyarakat.

Per 31 Desember tahun 2024, terdapat 16 program literasi di antaranya adalah:

1) TABA (TAman BAcaan) dengan 100 anak pembaca aktif dari 3 desa (Sukaluyu, Tamansari, dan Sukajaya)
2) GEBERBURA (GErakan BERantas BUta aksaRA) dengan 9 warga belajar
3) KEPRA (Kelas PRAsekolah) dengan 20 anak usia prasekolah
4) YABI (YAtim BInaan) dengan 14 anak yatim yang disantuni dan 4 di antaranya diberikan beasiswa
5) JOMBI (JOMpo BInaan) dengan 8 jompo usia lanjut
6) TBM Ramah Difabel dengan 2 anak difabel
7) KOPERASI LENTERA dengan 30 anggota
8) DonBuk (Donasi Buku),
9) RABU (RAjin menaBUng),
10) LITDIG (LITerasi DIGital) untuk mengenalkan cara internet sehat,
11) LITFIN (LITerasi FINansial), edukasi literasi keuangan
12) LIDAB (LIterasi ADAb), edukasi sopan santun dan adab
13) MOBAKE (MOtor BAca KEliling), beroperasi ke tiga kampung
14) Rooftop Baca, tempat membaca outdoor
15) Berantas Buta Aksara Al Quran.
16) Literasi budaya menabung sejak dini (SMP BESTARI UTAMI)

Selain itu, Bank Sinarmas juga menginisiasi kegiatan dalam rangka mendukung kegiatan pendidikan anak dengan menggelar event eksklusif hasil kolaborasi dengan Expert Education dan GWS Medika. Kegiatan ini turut membantu orang tua yang ingin atau sedang mempersiapkan putra/i mereka untuk menempuh pendidikan di luar negeri.

## KESEHATAN

Bank Sinarmas rutin melakukan program donor darah yang bekerja sama dengan Palang Merah Indonesia (PMI) setempat. Program tahunan ini merupakan kontribusi Bank demi pemenuhan stok darah untuk transfusi kepada masyarakat maupun karyawan yang membutuhkan. Sepanjang tahun 2024, Bank telah melaksanakan program ini sebanyak 3 kali dengan jumlah 219 kantong darah yang diterima.

and remote areas. The Bank's collaboration with TBM Lentera Pustaka has been on track and has had a positive impact on the community.

As of December 31, 2024, there were 16 literacy programs including:

1) TABA (TAman BAcaan/Reading Park) with 100 active child readers from three villages (Sukaluyu, Tamansari, and Sukajaya)
2) GEBERBURA (GErakan BERantas BUta aksaRA/ Movement to Eradicate Illiteracy) with nine adult learners
3) KEPRA (Kelas PRAsekolah/Pre-school Class) with 20 preschool-age children
4) YABI (YAtim BInaan/Assisted Orphans) with 14 orphans being cared for and four of them receiving scholarships
5) JOMBI (JOMpo BInaan/Assisted Elderly) with eight elderly beneficiaries
6) TBM Ramah Difabel (Disabled-Friendly TBM) with two disabled children
7) KOPERASI LENTERA with 30 members
8) DonBuk (Book Donation)
9) RABU (RAjin menaBUng/Saving Diligently)
10) LITDIG (LITerasi DIGital) to introduce healthy internet practices
11) LITFIN (LITerasi FINansial/Financial Literacy), financial literacy education
12) LIDAB (LIterasi ADAb/Ethical Literacy), education on manners and etiquette
13) MOBAKE (MOtor BAca KEliling/Mobile Library), operates to three villages
14) Rooftop Reading, outdoor reading place
15) Berantas Buta Aksara Al-Qur'an (Eradicate Illiteracy in the Quran)
16) Literacy of savings culture from an early age (SMP BESTARI UTAMI)

In addition, Bank Sinarmas also initiated activities to support children's education by holding an exclusive event in collaboration with Expert Education and GWS Medika. This activity also helps parents who want or are preparing their children to study abroad.

## HEALTH

Bank Sinarmas routinely conducts a blood donation program in collaboration with the local Indonesian Red Cross (PMI). This annual program is the Bank's contribution to the fulfillment of bloodstock for transfusion to the community and employees in need. Throughout 2024, the Bank conducted this program three times, with a total of 219 blood bags received.

Pada tahun 2024, Bank Sinarmas bersama tim dokter GWS Medika dan relawan Yayasan Tzu Chi menggelar pemeriksaan kesehatan gratis yang diikuti 110 warga. Berbagai periksa kesehatan seperti gula darah, kolesterol, penyakit umum, tensi dan berat badan disambut antusias warga.

## KEAGAMAAN

Sejumlah program dan bantuan dana ke sejumlah yayasan, pondok pesantren, serta masjid dan mushola telah dilaksanakan Bank sebagai bentuk perhatian dan dukungan Bank dalam kegiatan keagamaan. Beberapa Yayasan, Masjid dan Pondok Pesantren tersebut antara lain Masjid Agung Al-Jami' Pekalongan, Ponpes Al-Islah Bungah Gresik, Masjid Al Fatah Malang, Masjid Nurul Huda Malang, Masjid Baiturohman Batu, Pondok Pesantren Nurul Huda, Masjid An-Nur (Bumisari) Jakarta Selatan, Mushollah Ar-Raudhah, GPdi Ketapang dan Neo Soho serta Gereja Katolik Paroki St. Fransiskus Asisi APO di Kota Jayapura.

Pada momen Hari Haya Keagamaan seperti bulan Ramadhan dan Idul Fitri, Bank Sinarmas memberikan donasi dan santunan Ramadhan untuk masyarakat sekitar dan menjalankan Program Bingkisan Ramadhan kepada tenaga alih daya, khususnya tenaga pendukung (security, office boy/ girl, cleaning service, driver, serta ekspedisi). Bank juga menyelenggarakan Buka Puasa Bersama Karyawan dan Panti Asuhan/Pondok Pesantren serta Berkah Takjil Ramadhan.

Selain itu, pada Hari Raya Idul Adha, Bank memberikan sumbangan hewan kurban ke berbagai daerah dan lingkup masyarakat luas di Indonesia, salah satunya melalui MNC Peduli dan Bappepti.

## PERBAIKAN SARANA DAN PRASARANA SOSIAL

Bank Sinarmas terus meningkatkan program perbaikan saran dan prasarana sosial yang bertujuan agar tercipta sinergi dalam meningkatkan kesejahteraan masyarakat serta memperkuat fondasi pembangunan yang inklusif dan berkelanjutan.

Sejumlah aktivitas penyaluran dana untuk proyek perbaikan sarana dan prasarana sosial telah dilakukan oleh Bank pada tahun 2024, beberapa di antaranya adalah:

1. CSR perbaikan ruang Polres Lubuk Linggau;
2. CSR penggantian, perawatan dan perbaikan toilet sekolah SD dan SMP Yayasan Ekklesia Dumai;

In 2024, Bank Sinarmas, together with GWS Medika's team of doctors and Tzu Chi Foundation's volunteers, held a free health check-up, which was attended by 110 residents. Various health checks, such as blood sugar, cholesterol, general diseases, tension, and weight, were welcomed enthusiastically by the residents.

## RELIGIOUS

As a form of attention and support for religious activities, the Bank has implemented a number of programs and provided financial assistance to various foundations, Islamic boarding schools, mosques, and mushollas. Al-Jami' Grand Mosque Pekalongan, Al-Islah Bungah Gresik Islamic Boarding School, Al Fatah Mosque Malang, Nurul Huda Mosque Malang, Baiturohman Mosque Batu, Nurul Huda Islamic Boarding School, An-Nur Mosque (Bumisari) South Jakarta, Mushollah Ar-Raudhah, GPdi Ketapang and Neo Soho, and St. Francis Asisi APO Parish Catholic Church in Jayapura City are some of these Foundations, Mosques, and Islamic Boarding Schools.

On the occasion of Religious Holidays such as Ramadhan and Eid al-Fitr, Bank Sinarmas provides Ramadhan donations and compensation for the surrounding community and runs a Ramadhan Gift Program for outsourced personnel, especially support personnel (security, office boy/girl, cleaning service, driver, and expedition). The Bank also organized Iftar with employees and Orphanages/Islamic Boarding Schools as well as Ramadan Takjil Blessings.

In addition, on Eid al-Adha, the Bank donated sacrificial animals to various regions and the wider community in Indonesia, one of which was through MNC Peduli and Bappepti.

## SOCIAL FACILITY AND INFRASTRUCTURE REPAIR

Bank Sinarmas continues to increase the social infrastructure improvement program, which aims to create synergy in improving the welfare of the community and strengthening the foundation of inclusive and sustainable development.

A number of fund disbursement activities for social facilities and infrastructure improvement projects have been carried out by the Bank in 2024, among others:

1. CSR on Lubuk Linggau police station room renovation;
2. CSR on School toilet replacement, maintenance, and repair of elementary and junior high schools of Ekklesia Dumai Foundation;

## PROGRAM DONASI DAN FILANTROPI

Bank Sinarmas melaksanakan tanggung jawab sosial lingkungan (TJSL) sebagai wujud tanggung jawab perusahaan terhadap para pemangku kepentingan. Sepanjang tahun 2024 Bank Sinarmas telah mengalokasikan dana TJSL untuk program donasi kepada masyarakat, antara lain:

1. Bank Sinarmas membuka program solusi berkelanjutan yang berfokus pada diseminasi olah limbah peternakan dan sampah organik basis teknologi konsorsium MOL Biotaro untuk pangan sehat di Kabupaten Gianyar. Kegiatan ini diselenggarakan pada tanggal, 23 Februari 2024 bertempat di Umah Joglo Desa Petak, Gianyar, Bali
2. Sinarmas Mengabdi untuk Negeri, Peduli untuk Masyarakat, dilaksanakan pada tanggal 25 Agustus 2024 di TBM Lentera Pustaka dalam rangka memperingati ulang tahun ke-35 Bank Sinarmas. Kegiatan yang didukung oleh Yayasan Tzu Chi Sinarmas dan GWS Medika ini beberapa di antaranya adalah:
   a) berdonasi beras untuk 100 keluarga miskin dan
   b) pemeriksaan kesehatan gratis untuk 100 orang
   c) interaksi relawan dengan 160 anak pembaca aktif di TBM Lentera Pustaka.
3. Melalui aplikasi SiMobiPlus, Bank Sinarmas menyediakan menu donasi nasabah yang dapat membantu nasabah yang ingin menyalurkan dana donasi seperti pada program PeduliSehat.id.

Pada tahun 2024, Bank Sinarmas telah bekerja sama dengan berbagai pihak dalam penyaluran donasi dan telah mengeluarkan dana sebesar Rp 1.785.555.503,- untuk kegiatan filantropi.

Sepanjang tahun 2024, Bank Sinarmas telah mengalokasikan dana TJSL untuk program donasi kepada masyarakat, antara lain:

1. Pemberian bantuan sembako kepada korban bencana alam banjir di kabupaten sarolangun jambi oleh KCP lintas Sumatra di Sarolangun
2. Bantuan sosial kebutuhan pangan pra-sejahtera DKI Jakarta
3. Bantuan sosial minyak goreng pra-sejahtera Wongsorejo, Kabupaten Banyuwangi
4. Bantuan minyak goreng untuk Polres Jakarta Selatan
5. Bantuan pengadaan kursi roda oleh Yayasan Sahabat Insan Widyantara
6. Bantuan modal untuk UMKM PPLIPI
7. Donasi kegiatan Retreat Gereja Pantekosta di Indonesia

## DONATION AND PHILANTHROPY PROGRAM

Bank Sinarmas implements social and environmental responsibility (CSER) as a form of corporate responsibility to the stakeholders. Throughout 2024, Bank Sinarmas allocated CSER funds for donation programs to the community, among others:

1. Bank Sinarmas opened a sustainable solution program that focuses on the dissemination of livestock waste and organic waste processing based on MOL Biotaro consortium technology for healthy food in Gianyar Regency. This activity was held on February 23, 2024, at Umah Joglo, Petak Village, Gianyar, Bali.
2. Sinarmas Mengabdi untuk Negeri, Peduli untuk Masyarakat or Sinarmas Service for the Country, Cared for the Community, was held on August 25, 2024, at TBM Lentera Pustaka in commemoration of Bank Sinarmas' 35th anniversary. The activities supported by the Tzu Chi Sinarmas Foundation and GWS Medika included:
   a) rice donation for 100 impoverished families and
   b) free health checks for 100 people
   c) volunteer interaction with 160 active children readers at TBM Lentera Pustaka.
3. Through the SiMobiPlus application, Bank Sinarmas provides a customer donation menu that can help customers who want to channel donation funds such as in the PeduliSehat.id program.

In 2024, Bank Sinarmas cooperated with various parties in the distribution of donations and spent Rp1,785,555,503 for philanthropic activities.

Throughout 2024, Bank Sinarmas allocated CSER funds for donation programs to the community, among others:

1. Provision of basic food assistance to victims of the flood disaster in Sarolangun Regency, Jambi, by KCP Cross Sumatera in Sarolangun.
2. Social assistance for pre-prosperous food needs in DKI Jakarta
3. Social assistance for pre-prosperous cooking oil Wongsorejo, Banyuwangi Regency
4. Cooking oil assistance for South Jakarta Police
5. Wheelchair procurement assistance by Sahabat Insan Widyantara Foundation
6. Capital assistance for PPLIPI MSMEs
7. Donations for Indonesian Pentecostal Church Retreat activities

8. Bantuan sosial minyak goreng pra-sejahtera di Kabupaten Banyuwangi, Kabupaten Bondowoso dan Kabupaten Situbondo
9. Bantuan minyak goreng Polresta Tulungagung
10. Bantuan minyak goreng di Kota Malang
11. CSR kepada Serikat Pekerja Seluruh Indonesia (SPSI) PT Pabrik Kertas Tjiwi Kimia Tbk. oleh KC Mojokerto
12. Kegiatan Bakti Sosial pemberian beras dan alat sekolah kepada warga pra-sejahtera dan tuna wisma Lodan Raya
13. Bantuan musibah kebakaran rumah karyawan Bank Sinarmas
14. CSR kepada Raws Charity Taman Werdha Syailendra Foundation dan Raw Foundation
15. Pengadaan mobil ambulans kepada Forum Kounikasi Kaum Betawi Indonesia (FORKKABI)
16. Bantuan minyak goreng kepada Yayasan Pendidikan Sosial Raudlotus Sibyan Albadawi Demak
17. Bantuan minyak goreng untuk Polres Garut
18. Pengadaan mobil ambulans kepada Pondok Pesantren Salafy "BABUSSALAM SINDANGKERTA" Bandung Barat
19. Bantuan minyak goreng kepada Yayasan Ar Romah Insan Kamil
20. Bantuan minyak goreng kepada Kodim 0710 Pekalongan
21. Kontribusi ke Polresta Palu
22. Lomba Budaya Humanis Tzu Chi
23. HUT Polisi Militer AU ke-78 di Makassar
24. Bantuan Air Mineral Pristine ke Paguyuban Sosial Marga Tionghoa Indonesia (PSMTI) Pekalongan

8. Social assistance for pre-prosperous cooking oil in Banyuwangi Regency, Bondowoso Regency, and Situbondo Regency
9. Cooking oil donation from Polresta Tulungagung
10. Cooking oil donation in Malang City
11. CSR to the Indonesian Labor Union (SPSI) of PT Pabrik Kertas Tjiwi Kimia Tbk. by Mojokerto Branch Office
12. Social Service activities of providing rice and school supplies to underprivileged and homeless residents of Lodan Raya
13. Assistance in the fire disaster of Bank Sinarmas employee's house
14. CSR to Raws Charity Taman Werdha Syailendra Foundation and Raw Foundation
15. Procurement of ambulance car to Forum Kounikasi Kaum Betawi Indonesia (FORKKABI)
16. Donation of cooking oil to Raudlotus Sibyan Albadawi Social Education Foundation, Demak
17. Cooking oil donation to Garut Police
18. Procurement of ambulance car to Salafy Islamic Boarding School "BABUSSALAM SINDANGKERTA" West Bandung
19. Cooking oil donation to Ar Romah Insan Kamil Foundation
20. Cooking oil donation to Kodim 0710 Pekalongan
21. Contribution to Palu Police Station
22. Tzu Chi Humanist Culture Competition
23. 78th AU Military Police Anniversary in Makassar
24. Pristine Mineral Water donation to Pekalongan Chinese Social Marga Society of Indonesia (PSMTI)

# MENINGKATKAN KUALITAS PRODUK DAN LAYANAN

## Improve Product and Service Quality

Bank Sinarmas senantiasa berkomitmen untuk memberikan pengalaman terbaik kepada nasabah melalui inovasi produk dan peningkatan kualitas layanan. Bank percaya bahwa kepuasan dan kepercayaan nasabah merupakan fondasi utama dalam menjaga keberlanjutan bisnis. Oleh karena itu, Bank Sinarmas secara konsisten melakukan evaluasi dan pengembangan, baik dari sisi teknologi, keunggulan produk, maupun pendekatan layanan yang responsif terhadap kebutuhan pasar yang terus berkembang.

### MENYEDIAKAN PRODUK DAN LAYANAN YANG TERBAIK DAN SETARA [OJK F.17]

Bank Sinarmas selalu menempatkan nasabah sebagai pemangku kepentingan utama dalam keberlanjutan usaha. Demi menciptakan hubungan yang saling menguntungkan dan mendukung pembangunan berkelanjutan, Bank berupaya memberikan produk dan layanan terbaik bagi para nasabah.

Bank Sinarmas terus meningkatkan standar kualitas pelayanan serta memastikan pemberian layanan yang setara kepada seluruh nasabah di seluruh cakupan wilayah atas produk dan jasa yang ditawarkan. Salah satu yang menjadi titik utama insiatif pengembangan adalah melalui pengembangan teknologi digital. Bank berupaya meningkatkan layanan digital dengan fokus pada kebutuhan, kemudahan, dan kenyamanan nasabah.

### MENINGKATKAN KEPUASAN NASABAH [OJK F.30]

Kepuasan nasabah merupakan prioritas utama Bank Sinarmas dalam menjalankan operasional bisnis yang berkelanjutan. Melalui pendekatan yang berpusat pada kebutuhan nasabah, kami berkomitmen untuk menghadirkan layanan yang prima, solusi yang inovatif, serta pengalaman perbankan yang terpercaya. Bank Sinarmas secara rutin mengukur tingkat kepuasan nasabah dan menjadikannya sebagai dasar untuk terus meningkatkan kualitas produk, layanan, dan interaksi dengan para pemangku kepentingan.

Bank melakukan beberapa survei untuk mengukur apakah produk dan layanan yang diberikan telah memenuhi harapan nasabah. Survei ini dilakukan untuk mengevaluasi kualitas layanan kepada nasabah yang diberikan oleh Bank sebagai bahan penyempurnaan di masa mendatang. Bank Sinarmas mengukur tingkat kepuasan nasabah terhadap informasi produk dan layanan yang diberikan melalui dua metode survei berikut.

Bank Sinarmas is always committed to providing the best experience to customers through product innovation and service quality improvement. The Bank believes that customer satisfaction and trust are the main foundations in maintaining business sustainability. Therefore, Bank Sinarmas consistently evaluates and develops, both in terms of technology, product excellence, and service approaches that are responsive to the evolving market needs.

### PROVIDING THE BEST AND EQUAL PRODUCTS AND SERVICES [OJK F.17]

Bank Sinarmas has always regarded customers as the primary stakeholders in business sustainability. To foster a mutually beneficial relationship and promote long-term development, the Bank strives to provide the best products and services to its customers.

Bank Sinarmas continues to improve service quality standards and ensure that all customers receive equal service across all areas of coverage for the products and services offered. One of the primary goals of development initiatives is the advancement of digital technology. The Bank strives to improve digital services by prioritizing customer needs, convenience, and comfort.

### INCREASING CUSTOMERS SATISFACTION [OJK F.30]

Customer satisfaction is Bank Sinarmas' top priority in conducting sustainable business operations. Through a customer-centered approach, we are committed to providing excellent services, innovative solutions, and a trusted banking experience. Bank Sinarmas routinely measures the level of customer satisfaction and makes it a basis to continuously enhance the quality of products, services, and interactions with stakeholders.

The Bank conducts several surveys to measure whether the products and services provided have met customer expectations. This survey is conducted to evaluate the quality of services to customers provided by the Bank as material for future improvement. Bank Sinarmas measures the level of customer satisfaction with the product and service information provided through the following two survey methods.

1. Nilai Kepuasan Nasabah Melalui Koin/Tab/Scan QR
   Nasabah memberikan penilaian untuk petugas *Customer Service & Sales Officer* (CSSO)/*Teller* setiap kali mereka selesai bertransaksi dengan menggunakan koin/tab/*scan* QR. Penilaian tersebut terdiri dari tiga kategori, yakni *poor*, *good*, dan *excellent*. Hasil survei ini dianalisis setiap triwulan. Pada tahun pengukuran 2024, hasilnya sebagai berikut:

1. Customers Satisfaction Score through QR Coin/Tab/Scan
   Customers rate the Customer Service & Sales Officer (CSSO)/Teller every time they finish a transaction using a QR coin/tab/scan. The assessment consists of three categories, namely poor, good, and excellent. The results of this survey are analyzed quarterly. In the measurement year 2024, the results are as follows:

### Rata-Rata Persentase Koin Kepuasan (dalam %)
**Average Satisfaction Coin Percentage (in %)**

| Uraian<br>Description | Poor | Good | Excellent |
|---|---|---|---|
| Kantor Konvensional (Bank Sinarmas)<br>Conventional Office (Bank Sinarmas) | 0,017% | 2,47% | 97,51% |
| Kantor Syariah (Bank Nano Syariah)<br>Sharia Office (Bank Nano Syariah) | 0,001% | 1,90% | 98,10% |

2. *Customer Satisfaction Survey*
   Pada tahun 2024, Bank melaksanakan *Customer Satisfaction* Survei dengan Net Promotor Score sebesar 87, dengan rincian sebagai berikut:

2. Customer Satisfaction Survey
   In 2024, the Bank conducted a Customer Satisfaction Survey with a Net Promoter Score of 87, with the following details:

### Jumlah Responden
**Number of Respondents**

| Uraian<br>Description | Datang ke Kantor<br>Come to Office | Melalui E-mail<br>Via E-Mail | Jumlah | Total Nasabah<br>Total Customers |
|---|---|---|---|---|
| Nasabah<br>Customer | 5.828 | 1.253 | | 7.081 |

### Rincian Customer Satisfaction Survei
**Details of Customer Satisfaction Survei**

| No | Uraian<br>Description | Nilai<br>Score |
|---|---|---|
| 1 | Branch Office | 4,93 |
| 2 | Customer Care | - |
| 3 | SimobiPlus | 4,93 |
| 4 | IB Personal | 4,91 |
| 5 | IB Business | 4,88 |
| 6 | ATM | 4,91 |

### Masukan untuk Menu/Fitur SimobiPlus
Secara umum Bank Sinarmas menjunjung tinggi aspek-aspek perlindungan nasabah dan selalu berupaya memastikan untuk memberikan layanan terbaik kepada nasabah Bank khususnya pengguna mobile Banking SimobiPlus. Kami juga berupaya untuk mendengarkan masukan-masukan yang membangun dari nasabah kami untuk pengembangan SimobiPlus secara berkelanjutan dan melalui survei yang kami lakukan.

### Feedback for SimobiPlus Menu/Features
In general, Bank Sinarmas upholds the aspects of customer protection and always strives to ensure it provides the best service to the Bank's customers, especially SimobiPlus mobile banking users. We also strive to listen to constructive feedback from our customers for the continuous development of SimobiPlus and in our survey.

Kami memahami bahwa nasabah-nasabah kami menginginkan adanya peningkatan performa sistem pada SimobiPlus, seperti kemudahan penggunaan (*user friendly*) dan peningkatan desain antar-muka (*user interface*) untuk memberikan pengalaman terbaik kepada nasabah kami. Berdasarkan masukan-masukan tersebut, kami telah menghadirkan tampilan baru yang lebih modern dan intuitif, memastikan navigasi yang lebih mudah dan pengalaman yang lebih menyenangkan bagi pengguna. Selain itu, kami juga menambahkan berbagai fitur utilitas yang mempermudah transaksi harian Anda—mulai *dari logout button, Simas Calendar, dan navigation bar*.

We understand that our customers want to improve the system performance of SimobiPlus, such as user-friendliness and improved user interface design, to provide the best experience to our customers. Based on this feedback, we delivered a more modern and intuitive new look, ensuring easier navigation and a more enjoyable experience for users. In addition, we added various utility features that simplify your daily transactions, from the logout button to the Simas Calendar and navigation bar.

Tidak hanya itu, kami berkomitmen untuk memberikan lebih banyak keuntungan bagi pengguna dengan menghapus biaya administrasi, sehingga nasabah dapat menikmati layanan perbankan yang lebih hemat dan efisien.

Moreover, we are committed to providing more benefits to users by removing administration fees so that customers can enjoy more cost-effective and efficient banking services.

## INOVASI PRODUK DAN LAYANAN [OJK F.26]

Pada tahun 2024, Bank terus melakukan inovasi serta pengembangan produk dan layanan melalui transformasi digital sebagai upaya dalam menunjang pelaksanaan kegiatan usaha yang berkelanjutan. Hal ini tidak hanya memudahkan nasabah dalam melakukan transaksi, tetapi juga secara tidak langsung dapat membantu pengurangan tingkat polusi dan emisi akibat berkurangnya aktivitas transportasi.

Pada aplikasi *mobile banking* SimobiPlus, Bank terus mengembangkan berbagai fitur seperti pembukaan rekening online, transaksi QRIS, pembayaran tagihan, dan manajemen aset. Selain itu, Bank Sinamas juga melakukan peluncuran Sistem Originasi Pinjaman Usaha Mikro, Kecil, dan Menengah (UMKM) yang merupakan otomatisasi proses bisnis *end-to-end* untuk originasi pinjaman, penilaian kredit, penjaminan, dan persetujuan pinjaman.

Sistem Originasi Pinjaman UMKM dirancang untuk memungkinkan perseroan melakukan otomatisasi proses akuisisi kredit, mulai dari input data prospek melalui aplikasi mobile, proses penilaian pinjaman, penilaian risiko otomatis hingga otomatisasi alur kerja persetujuan untuk menyetujui atau menolak aplikasi pinjaman UMKM.

Berbagai inisiatif pada transformasi digital tersebut membawa Bank Sinarmas meraih dua penghargaan Indonesia Technology Excellence Awards 2024 di Bangkok, Thailand.

## PRODUCTS AND SERVICES INNOVATION [OJK F.26]

In 2024, the Bank continued to innovate and develop products and services through digital transformation as an effort to support the implementation of sustainable business activities. This not only makes it easier for customers to make transactions but also indirectly helps reduce pollution and emissions due to fewer transportation activities.

In the SimobiPlus mobile banking application, the Bank continues to develop various features such as online account opening, QRIS transactions, bill payments, and asset management. In addition, Bank Sinamas also launched the Micro, Small, and Medium Enterprises (MSME) Loan Origination System, an end-to-end business process automation for loan origination, credit appraisal, guarantee, and loan approval.

The MSME Loan Origination System is designed to allow the Company to automate the loan acquisition process, starting from the input of prospect data through the mobile application, loan appraisal process, automatic risk assessment, and the automation of approval workflow to approve or reject MSME loan applications.

Bank Sinarmas won two Indonesia Technology Excellence Awards 2024 in Bangkok, Thailand, for various initiatives on digital transformation.

## Bank Sinarmas Raih Penghargaan Atas Pengembangan SimobiPlus

Bank Sinarmas Receives Awards for SimobiPlus Development

Bank Sinarmas meraih dua penghargaan Indonesia Technology Excellence Awards 2024 for Mobile-Banking for SimobiPlus Revamp dan Indonesia Technology Excellence Award for Automation- Banking for MSME Loan Origination System dalam Indonesia Technology Excellence Awards 2024 di Thailand, Bangkok.

Kedua penghargaan tersebut didapat atas keberhasilan pengembangan aplikasi mobile banking SimobiPlus, serta peluncuran Sistem Originasi Pinjaman Usaha Mikro Kecil dan Menengah (UMKM) yang merupakan otomatisasi proses bisnis end-to-end untuk originasi pinjaman, penilaian kredit, penjaminan, dan persetujuan pinjaman.

Bank Sinarmas received two Indonesia Technology Excellence Awards 2024, one for Mobile Banking for SimobiPlus Revamp and one for Automation Banking for MSME Loan Origination System, both in Bangkok, Thailand.

Both awards were given for the successful development of the SimobiPlus mobile banking app and the launch of the Micro, Small, and Medium Enterprises (MSME) Loan Origination System, which automates loan origination, credit appraisal, underwriting, and loan approval.

## DAMPAK PRODUK DAN LAYANAN KEUANGAN BERKELANJUTAN [OJK F.28]

Bank Sinarmas berkomitmen untuk menerapkan keuangan berkelanjutan yang tercermin dalam Kredit Kegiatan Usaha Berkelanjutan (KKUB). Bank telah memiliki sistem audit internal yang melaksanakan aktivitas audit internal terkait dampak negatif yang dihasilkan atas pembiayaan KKUB.

Sepanjang tahun 2024, Bank tidak mencatat adanya dampak negatif yang timbul akibat kegiatan bisnis keuangan berkelanjutan.

Dalam rangka mendukung komunikasi dan layanan tanpa batas kepada nasabah, Bank Sinarmas menyediakan “Bank Sinarmas CARE,” yaitu layanan call center selama 24 jam. Nasabah dapat menghubungi layanan ini melalui nomor 1500153 atau (021) 501 88888. Layanan ini dapat membantu menjawab pertanyaan, memberikan bantuan, dan menangani berbagai masalah terkait dengan produk dan layanan Bank Sinarmas.

## EVALUASI KEAMANAN PRODUK DAN LAYANAN [OJK F.27]

Komitmen Bank terhadap evaluasi keamanan produk dan layanan keuangan dicerminkan dengan dilakukannya audit dan pengecekan rutin sebelum produk dan layanan tersebut diluncurkan. Dalam pelaksanaannya, Bank melibatkan pihak eksternal, seperti Bank Indonesia dan Otoritas Jasa Keuangan.

Bank senantiasa memastikan bahwa semua produk dan layanan memenuhi regulasi Otoritas Jasa Keuangan, termasuk UndangUndang No. 10 Tahun 1998 tentang Perubahan atas UndangUndang No. 7 Tahun 1992 tentang Perbankan serta Peraturan Otoritas Jasa Keuangan No. 22 Tahun 2023 tentang Pelindungan Konsumen dan Masyarakat di Sektor Jasa Keuangan.

## IMPACT OF SUSTAINABLE FINANCE PRODUCTS AND SERVICES [OJK F.28]

Bank Sinarmas is committed to implementing sustainable finance, which is reflected in the Sustainable Business Activity Credit (KKUB). The Bank has an internal audit system that carries out internal audit activities related to the negative impacts generated by KKUB financing.

Throughout 2024, the Bank did not record any negative impacts arising from sustainable finance business activities.

In order to support unlimited communication and services to customers, Bank Sinarmas provides “Bank Sinarmas CARE,” a 24-hour call center service. Customers can contact this service through the number 1500153 or (021) 501 88888. This service can help answer questions, assist, and handle various problems related to Bank Sinarmas products and services.

## PRODUCT AND SERVICE SAFETY EVALUATION [OJK F.27]

The Bank’s commitment to evaluating the safety of financial products and services is reflected in the regular audits and checks conducted prior to their launch. The Bank works with external parties on its implementation, including Bank Indonesia and the Financial Services Authority.

The Bank always ensures that all products and services comply with Financial Services Authority regulations, including Law No. 10 of 1998 on the Amendment to Law No. 7 of 1992 on Banking and Financial Services Authority Regulation No. 22 of 2023 on Consumer and Community Protection in the Financial Services Sector.

Bank juga menjamin perlindungan privasi data nasabah dengan merujuk pada Undang-Undang No. 27 Tahun 2022 tentang Perlindungan Data Pribadi dan Peraturan Otoritas Jasa Keuangan No. 22 Tahun 2023 tentang Pelindungan Konsumen dan Masyarakat di Sektor Jasa Keuangan. Terkait dengan manajemen risiko, SKMR melakukan kajian risiko terhadap rencana penerbitan produk dan aktivitas baru sesuai Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum dan Peraturan Pelaksanaannya.

## PRIVASI DATA [GRI 418-1]

Pada era digital yang semakin terhubung, perlindungan data privasi menjadi salah satu pilar utama dalam membangun kepercayaan nasabah. Bank Sinarmas berkomitmen untuk menjaga kerahasiaan dan keamanan data nasabah melalui penerapan standar perlindungan data yang ketat dan sesuai dengan regulasi yang berlaku. Bank terus meningkatkan infrastruktur teknologi dan kebijakan internal untuk memastikan bahwa informasi pribadi nasabah dikelola dengan transparansi, tanggung jawab, dan integritas tinggi.

Dalam mengelola privasi data nasabah, Bank memiliki Kebijakan Privasi yang menguraikan secara transparan bagaimana cara Bank mengumpulkan, menyimpan, mengolah, menganalisis, dan menggunakan data pribadi nasabah. Adapun selama tahun 2024, Bank tidak memiliki kasus terkait kebocoran data nasabah.

Informasi lebih lengkap terkait Kebijakan Privasi dapat dilihat pada *website* Bank Sinarmas dengan tautan https://www.banksinarmas.com/id/layanan/simobi-plus-kebijakanprivasi

## PENARIKAN PRODUK DAN LAYANAN [OJK F.29]

Sepanjang tahun taun 2024, tidak ada produk atau layanan dari Bank yang ditarik dari peredaran. Hal ini dikarenakan produk dan layanan yang ditawarkan oleh Bank Sinarmas tidak melanggar ketentuan regulator, dilengkapi dengan sistem keamanan data yang memadai, dan masih diminati oleh nasabah.

## MEKANISME PENGADUAN MASYARAKAT DAN KELUHAN NASABAH [OJK F.16][OJK F.24]

Bank menyediakan beberapa kanal pengaduan bagi masyarakat apabila menemukan tindakan menyimpang terkait pelaksanaan program pengembangan sosial dan kemasyarakatan. Kanal-kanal tersebut dapat juga digunakan untuk menerima keluhan dari nasabah terkait produk dan layanan yang ditawarkan oleh Bank.

The Bank also ensures the protection of customer data privacy by referring to Law No. 27 of 2022 on Personal Data Protection and Financial Services Authority Regulation No. 22 of 2023 on Consumer and Community Protection in the Financial Services Sector. In relation to risk management, the Risk Management Unit (SKMR) conducts a risk assessment of the plan to issue new products and activities in accordance with the Financial Services Authority Regulation No. 18/POJK.03/2016 concerning the Implementation of Risk Management for Commercial Banks and its Implementing Regulations.

## DATA CONFIDENTIALITY [GRI 418-1]

In the increasingly connected digital era, data privacy protection has become one of the main pillars of building customer trust. Bank Sinarmas is committed to maintaining the confidentiality and security of customer data through the implementation of strict data protection standards and in accordance with applicable regulations. The Bank continues to improve technology infrastructure and internal policies to ensure that customers' personal information is managed with transparency, responsibility, and high integrity.

In managing customer data privacy, the Bank has a Privacy Policy that transparently elaborates how the Bank collects, stores, processes, analyzes, and uses customer personal data. During 2024, the Bank has no cases related to customer data leakage.

Please see more complete information related to the Privacy Policy on the Bank Sinarmas website with the following link https://www.banksinarmas.com/id/layanan/simobi-plus-kebijakanprivasi

## PRODUCT AND SERVICE RECALLS [OJK F.29]

Throughout 2024, no Bank products or services have been withdrawn from circulation. It is because Bank Sinarmas' products and services do not violate regulatory provisions, are equipped with an adequate data security system, and continue to be in high demand among customers.

## MECHANISM FOR PUBLIC AND CUSTOMER COMPLAINTS [OJK F.16][OJK F.24]

The Bank provides several grievance channels for the community if they find any deviant actions related to the implementation of social and community development programs. These channels can also be used to receive complaints from customers regarding products and services offered by the Bank.

Kanal layanan yang tersedia adalah:
1. Kantor Cabang;
2. Bank Sinarmas CARE di Nomor 1500153/021 - 50188888
3. E-mail care@banksinarmas.com;
4. Agent chat di situs web: www. banksinarmas.com;
5. Facebook;
6. WhatsApp di nomor 08822-1500-153;
7. Twitter ("sekarang dikenal dengan nama "X");
8. Tiktok dan
9. Instagram resmi Bank Sinarmas.

Seluruh laporan yang diterima Bank akan ditindaklanjuti dengan baik dan objektif, tanpa adanya diskriminasi, oleh Divisi Contact Center, Telemarketing, dan Consumer Protection dengan merujuk pada kebijakan SK.036/2024/DIR5-ContactCenter - Standard Operating Procedure (SOP) tentang Penanganan Pengaduan Nasabah Bank Sinarmas Versi 5.0. Hal ini juga dijadikan sebagai bahan evaluasi internal demi keberlangsungan usaha di masa mendatang.

Apabila terdapat pengaduan ataupun masukan terkait dampak positif dan/atau negatif dari penerapan keuangan berkelanjutan, dapat pula disampaikan melalui situs web konsumen Otoritas Jasa Keuangan/Sistem Layanan Terintegrasi di sektor jasa keuangan, media massa, media sosial, atau tatap muka di seluruh Kantor Cabang Bank Sinarmas.

Pada tahun 2024, laporan yang diterima berkaitan dengan:
1. Mobile Banking
2. ATM/Kartu Debit
3. Internet Banking
4. QRIS
5. Kartu Kredit
6. Direct Debit
7. Uang Elektronik

Sepanjang tahun 2024, Divisi Contact Center, Telemarketing, dan Consumer Protection mencatat 13.229 laporan pengaduan terkait produk dan layanan. Di mana 13.027 laporan di antaranya dinyatakan selesai pada 2024, dan 202 laporan sisanya ditindaklanjuti pada Januari 2025. Dari 202 laporan tersebut, 192 telah dinyatakan selesai pada Januari 2025 sehingga tersisa 10 laporan yang masih dalam tahap penanganan saat laporan ini disusun.

Adapun rata-rata jenis pengaduan yang diterima adalah mengenai kendala Mobile Banking, kendala Transaksi ATM, Internet Banking, QRIS, Kartu Kredit, Direct Debit dan Uang Elektronik. Berikut adalah uraian keluhan terhadap produk dan layanan:

The available service channels are:
1. Branch Offices;
2. Bank Sinarmas CARE at Number 1500153/021 - 50188888
3. E-mail care@banksinarmas.com;
4. Agent chat on the website: www. banksinarmas.com;
5. Facebook;
6. WhatsApp at number 08822-1500-153;
7. Twitter ("now known as "X");
8. Tiktok, and
9. Official Instagram of Bank Sinarmas.

All reports received by the Bank will be followed up properly and objectively, without any discrimination, by the Contact Center, Telemarketing, and Consumer Protection Division by referring to the policy SK.036/2024/DIR5-ContactCenter-Standard Operating Procedure (SOP) on Customer Complaint Handling of Bank Sinarmas Version 5.0. This is also used as an internal evaluation material for future business continuity.

If there are any complaints or inputs about the positive and/or negative effects of the implementation of sustainable finance, they can be submitted via the Financial Services Authority's consumer website/Integrated Service System in the financial services sector, mass media, social media, or in person at any Bank Sinarmas Branch Office.

In 2024, the reports received are related to:
1. Mobile Banking
2. ATM/Debit Card
3. Internet Banking
4. QRIS
5. Credit Card
6. Direct Debit
7. Electronic Money

Throughout 2024, the Contact Center, Telemarketing, and Consumer Protection Division received 13,229 complaints about products and services. 13,027 reports were declared completed in 2024, with the remaining 202 reports being followed up in January 2025. Of the 202 reports, 192 were declared complete in January 2025, leaving 10 reports that remained in progress during the preparation of this report.

The most common types of complaints are about mobile banking issues, ATM transactions, internet banking, QRIS, credit cards, direct debit, and electronic money. The following are common complaints about these products and services:

| Uraian<br>Description | 2024 | | | 2023 | | 2022 | |
|---|---|---|---|---|---|---|---|
| | Selesai<br>Finished | Sedang ditindaklanjuti<br>Being Followed up | Jumlah keluhan<br>Total complaints | Selesai<br>Finished | Jumlah keluhan<br>Total complaints | Selesai<br>Finished | Jumlah keluhan<br>Total complaints |
| Produk dan/atau layanan<br>Product and/or service | 13.027 | 202 | 13.229 | 13.171 | 13.171 | 33.173 | 33.173 |

## MENJALIN HUBUNGAN YANG BAIK DENGAN MITRA BISNIS ATAU REKANAN

Dalam melaksanakan usahanya, Bank melibatkan mitra bisnis atau rekanan dalam proses pengadaan barang dan/atau jasa. Maka dari itu, Bank bertekad dan berupaya menjaga hubungan baik dengan mitra bisnis atau rekanan dengan menjunjung tinggi prinsip-prinsip keadilan dan transparansi tanpa terkecuali.

Rincian terkait jumlah mitra bisnis atau rekanan diungkapkan pada tabel berikut:

## ESTABLISHING GOOD RELATIONSHIP WITH BUSINESS PARTNERS OR ASSOCIATES

In conducting its business, the Bank involves business partners or associates in the procurement of goods and/or services. Therefore, the Bank is determined and strives to maintain good relations with business partners or associates by upholding the principles of fairness and transparency without exception.

Details related to the number of business partners or associates are disclosed in the following table:

| Kelompok Mitra Bisnis atau Rekanan<br>Group of Business Partners or Associates | 2024 | | 2023 | |
|---|---|---|---|---|
| | Jumlah Entitas<br>Total Entity | Persentase<br>Percentage | Jumlah Entitas<br>Total Entity | Persentase<br>Percentage |
| Nasional<br>National | 177 | 98,8% | 149 | 96,8% |
| Luar Negeri<br>Overseas | 4 | 2,2% | 5 | 3,2% |
| **Jumlah**<br>**Total** | **181** | **100%** | **154** | **100%** |

# MENINGKATKAN KEPEDULIAN TERHADAP LINGKUNGAN
## Increasing Concern for the Environment



Dalam menjalankan kegiatan usaha perbankan, Bank Sinarmas tidak bersinggungan langsung dengan lingkungan hidup sehingga tidak memiliki dampak negatif terhadap lingkungan. Namun demikian, Bank menyadari posisi penting perbankan dalam melakukan pembiayaan terhadap kegiatan-kegiatan yang berdampak langsung terhadap lingkungan. Selain itu, Bank juga tetap berupaya menjalankan praktik operasional perbankan yang ramah lingkungan atau konsep *green banking*.

Oleh karena itu, Bank telah merumuskan dan mengupayakan serangkaian kebijakan yang mencakup pelaksanaan kegiatan operasional perbankan yang ramah lingkungan. Beberapa kebijakan tersebut adalah:

1. SK.008/2020/DIR5-GA tentang Petunjuk Pelaksanaan Penghematan Kertas, Listrik, dan Air;

2. Surat Edaran No.SE.005/2022/PRESDIR-HCSS tentang komunitas karyawan, dimana Perusahaan telah mewajibkan seluruh Komunitas Karyawan dalam menjalankan kegiatannya wajib mendukung kelestarian lingkungan atau go green.

### PENGGUNAAN MATERIAL YANG RAMAH LINGKUNGAN [OJK F.5]

Bank Sinarmas memegang teguh komitmen untuk bertindak secara bertanggung jawab terhadap lingkungan dalam menjalankan kegiatan operasional usahanya. Salah satu bentuk komitmen ini adalah menggunakan material yang ramah lingkungan. Beberapa inisiatif penggunaan material ramah lingkungan yang diterapkan Bank adalah melalui transformasi digital dan pengembangan sistem berbasis digital serta teknologi informasi dalam penerapan keuangan berkelanjutan.

Dengan komitmen transformasi digital, Bank Sinarmas dapat memberikan layanan dan/atau produk keuangan yang lebih cepat dan mudah diakses oleh nasabah, sekaligus mengurangi penggunaan kertas dan limbah elektronik yang berpotensi merugikan lingkungan. Penggunaan sistem ini tidak hanya bertujuan untuk mengurangi risiko lingkungan, seperti polusi, tetapi juga meningkatkan efisiensi operasional Bank.

In carrying out its banking business activities, Bank Sinarmas does not directly interact with the environment, thus, it does not have any negative impact on the environment. Nevertheless, the Bank is aware of the important position of banking in financing activities that have a direct impact on the environment. Furthermore, the Bank also continues to strive to implement environmentally friendly banking operational practices or the green banking concept.

Consequently, the Bank has formulated and pursued a series of policies that include the implementation of environmentally friendly banking operational activities. Some of these policies are:

1. SK.008/2020/DIR5-GA concerning Guidelines for Implementation Paper, Electricity, and Water Conservation Measures;
2. Circular Letter No.SE.005/2022/PRESDIR-HCSS regarding employee communities, where the Company has required all Employee Communities in carrying out their activities to support environmental sustainability or go green.

### UTILIZATION OF ENVIRONMENTALLY FRIENDLY MATERIALS [OJK F.5]

Bank Sinarmas firmly holds a commitment to act responsibly towards the environment in carrying out its business operations. One form of this commitment is the utilization of environmentally friendly materials. Several initiatives in environmentally friendly practices that the Bank has implemented are through the promotion of digital transformation and the development of digital-based systems and information technology in the application of sustainable finance.

Through a commitment to digital transformation, Bank Sinarmas can provide financial services and/or products that are faster and more easily accessible to customers, while reducing paper usage and electronic waste that have the potential to harm the environment. The use of this system is not only intended to reduce environmental risks, such as pollution, but also to enhance the Bank's operational efficiency.

## PENGGUNAAN ENERGI DAN EMISI

Sebagai bagian dari komitmen terhadap praktik bisnis berkelanjutan dan mendukung pencapaian target Net Zero Emission, Bank Sinarmas secara konsisten melakukan upaya pengurangan konsumsi energi dan emisi karbon. Bank meyakini bahwa kontribusi dunia usaha sangat penting dalam menghadapi tantangan perubahan iklim.

Sebagai bagian dari komitmen terhadap praktik bisnis berkelanjutan dan mendukung pencapaian target *Net Zero Emission*, Bank Sinarmas secara konsisten melakukan upaya pengurangan konsumsi energi dan emisi karbon. Bank meyakini bahwa kontribusi dunia usaha sangat penting dalam menghadapi tantangan perubahan iklim.

Pada aktivitas operasional perbankan, Bank Sinarmas menggunakan dua sumber daya utama, yaitu listrik dan bahan bakar minyak (BBM). Bank menggunakan energi listrik yang disediakan oleh Perusahaan Listrik Negara (PLN) untuk mengoperasikan peralatan elektronik kantor, pendingin ruangan (*air conditioner/AC*), penerangan, serta kebutuhan *lift*. Sementara itu, melalui Stasiun Pengisian Bahan Bakar Umum (SPBU) terdekat, kebutuhan BBM yang digunakan untuk memenuhi kebutuhan bahan bakar kendaraan operasional termasuk juga kebutuhan bahan bakar genset.

Bank menyadari dengan waktu operasional Bank yang berlaku saat ini, Bank tidak dapat menghindari tingginya konsumsi energi. Maka dari itu, Bank Sinarmas berupaya secara maksimal praktik efisiensi energi dalam mengurangi dampak lingkungan dan menjaga ketersediaan sumber daya energi. Bank berupaya mengurangi emisi gas rumah kaca secara tidak langsung dengan meningkatkan efisiensi operasional. Hal ini dilaksanakan dengan mengadopsi pola konsumsi energi yang bertanggung jawab.

Sepanjang tahun 2024, inisiatif yang telah dilakukan untuk mendukung program efisiensi energi dan emisi antara lain: **[OJK F.7][OJK F.12]**

1. Pengaturan pemakaian pendingin ruangan dan lampu, serta penggunaan lampu *Light Emitting Diode (LED)* di beberapa wilayah operasional.
2. Penggunaan sumber energi terbarukan yang berasal dari panel surya di Kantor Cabang Klampis dan Diponegoro.
3. Penggunaan motor listrik sebagai pengganti kendaraan berbahan bakar fosil dalam kegiatan operasional di beberapa kantor cabang.
4. Pelaksanaan rapat atau pertemuan secara daring sehingga mengurangi penggunaan kendaraan operasional kantor.
5. Penyediaan ruang terbuka hijau di sekitar wilayah kantor.

## ENERGY AND EMISSION CONSUMPTION

As part of the commitment to sustainable business practices and to support the achievement of the Net Zero Emission target, Bank Sinarmas consistently makes efforts to reduce energy consumption and carbon emissions. The Bank believes that the contribution of the business world is very important in facing the challenges of climate change.

As part of the commitment to sustainable business practices and to support the achievement of the Net Zero Emission target, Bank Sinarmas consistently makes efforts to reduce energy consumption and carbon emissions. The Bank believes that the contribution of the business world is very important in facing the challenges of climate change.

In banking operational activities, Bank Sinarmas uses two main resources, namely electricity and fuel. The Bank uses electricity provided by the State Electricity Company (PLN) to operate office electronic equipment, air conditioners (AC), lighting, and elevator needs. Meanwhile, through the nearest Gas Station (SPBU), fuel is obtained and is used to fulfill the fuel requirements of operational vehicles and generators.

The Bank realizes that with the Bank's current operational hours, high energy consumption is inevitable. Therefore, Bank Sinarmas makes maximum efforts to practice energy efficiency in reducing environmental impacts and preserving energy resources. The Bank seeks to reduce greenhouse gas emissions indirectly by enhancing operational efficiency. This is done by adopting responsible energy consumption patterns.

In 2024, initiatives that were carried out to support energy efficiency and emission programs include:

1. Managing air conditioning and lighting usage, as well as the use of Light Emitting Diode (LED) lights in several operational areas.
2. Utilizing renewable energy sources from solar panels at the Klampis and Diponegoro Branch Offices.
3. Utilizing electric motorcycles as a substitute for fossil fuel vehicles in operational activities at several branch offices.
4. Implementing online meetings or gatherings to reduce the use of office operational vehicles.
5. Providing green open spaces around office areas.

## Biaya Penggunaan Energi [OJK F.4]
### Energy Usage Costs

| Uraian | Satuan<br>Unit | 2024 | 2023 | 2022 | Description |
|---|---|---|---|---|---|
| Listrik | Rp Juta<br>Rp Million | 1.799 | 2.951 | 3.925 | Electricity |
| Bahan Bakar Minyak | Rp Juta<br>Rp Million | 309 | 354 | 156 | Fuel |
| Jumlah | Rp Juta<br>Rp Million | 2.108 | 3.305 | 4.081 | Total |
| Biaya Penggunaan Energi | Rp Juta<br>Rp Million | 1.197 | 776 | 1.281 | Energy Usage Cost |

## Penggunaan Energi Tidak Terbarukan [OJK F.6][GRI 302-1][GRI 302-3]
### Non-Renewable Energy Usage

| Uraian | Satuan<br>Unit | 2024 | 2023 | 2022 | Description |
|---|---|---|---|---|---|
| Listrik | kWh | 527.220 | 402.789 | 462.594 | Electricity |
| | GJ | 1.897,99 | 1.450,04 | 1.665,34 | |

## Penggunaan Energi Terbarukan [OJK F.6][GRI 302-1][GRI 302-3]
### Renewable Energy Usage

| Uraian | Satuan<br>Unit | 2024 | 2023 | 2022 | Description |
|---|---|---|---|---|---|
| Panel Surya | kWh | 26.654 | 25.766 | 39.970 | Solar Panels |
| | GJ | 95,95 | 92,76 | 143,89 | |

- Cakupan penghitungan di Kantor Cabang Klampis dan Diponegoro
- Pernyataan kembali tahun 2022 dan 2023
- Calculation coverage at Klampis and Diponegoro Branch Offices
- Restatement in 2022 and 2023

## Total Penggunaan Energi [OJK F.6][GRI 302-1][GRI 302-3]
### Total Energy Usage

| Uraian | Satuan<br>Unit | 2024 | 2023 | 2022 | Description |
|---|---|---|---|---|---|
| Energi Tidak Terbarukan | GJ | 1.897,99 | 1.450,04 | 1.665,34 | Non-Renewable Energy |
| Energi Terbarukan | GJ | 95,95 | 92,76 | 143,89 | Renewable Energy |
| Total | GJ | 1.993,94 | 1.542,80 | 1.809,23 | Total |
| Intensitas Energi | GJ/Rp Juta<br>GJ/Rp Million | 0,00077 | 0,00059 | 0,00071 | Energy Intensity |

## Jumlah Emisi yang Dihasilkan [OJK F.11]
### Total Emissions Generated

| Uraian | Satuan<br>Unit | 2024 | 2023 | 2022 | Description |
|---|---|---|---|---|---|
| Cakupan 2 | Ton$CO_2$ eq | 416,50 | 318,20 | 365,45 | Scope 2 |
| Jumlah emisi | Ton$CO_2$ eq | 416,50 | 318,20 | 365,45 | Total Emissions |
| Intensitas Emisi | Ton$CO_2$ eq/ Rp Juta<br>Ton$CO_2$ eq/Rp Million | 0,00016 | 0,00012 | 0,00014 | Emission intensity |

Catatan: Pernyataan kembali untuk tahun 2022 dan 2023
Note: Restatement for 2022 and 2023

## Efisiensi Air

Dalam pemenuhan air bersih, Bank memanfaatkan air yang berasal dari Perusahaan Daerah Air Minum (PDAM). Selain untuk memenuhi keperluan kebersihan, air juga digunakan untuk menunjang kegiatan beribadah dan lainnya. Salah satu upaya efisiensi penggunaan air yang dilakukan Bank adalah melakukan sosialisasi penggunaan air secara bijak kepada seluruh karyawan dan nasabah. Selain itu, Bank melakukan perawatan secara berkala dengan melakukan pemeriksaan keran dan pipa saluran air untuk menghindari kebocoran.

Dalam pencatatan pelaporan, Bank belum dapat mengidentifikasi penggunaan air berdasarkan satuan metrik karena pencatatan air berasal dari pihak gedung. Meski demikian, Bank tetap melaporkan penggunaan air berdasarkan biaya yang dikeluarkan selama satu tahun. Adapun cakupan penghitungan penggunan air berasal dari KNPO Roxy Square.

## Water Efficiency

In fulfilling clean water, the Bank utilizes water from the Regional Drinking Water Company (PDAM). In addition to fulfill cleanliness needs, water is also used to support religious activities and others. One of the Bank's efforts to efficiently use water is to socialize the wise use of water to all employees and customers. Moreover, the Bank carries out regular maintenance by inspecting taps and water pipelines to prevent leaks.

In reporting recording, the Bank has not been able to identify water usage based on metric units because water recording comes from the building. However, the Bank still reports water usage based on costs incurred for one year. The scope of water usage calculations comes from KNPO Roxy Square.

### Biaya Penggunaan Air [OJK F.8]
**Water Expense**

| Uraian | Satuan<br>Unit | 2024 | 2023 | 2022 | Description |
|---|---|---|---|---|---|
| PDAM | Rp Juta<br>Rp Million | 36,16 | 39,73 | 26 | Regional Drinking Water Company (PDAM). |

## PENGELOLAAN LIMBAH [OJK F.13][OJK F.14]

Aktivitas operasional perbankan Bank Sinarmas tidak menghasilkan limbah berbahaya. Namun, kegiatan perkantoran tetap menghasilkan sampah kering seperti kertas maupun sampah basah seperti sisa makanan. Sampah-sampah tersebut kemudian dikelola oleh pihak gedung untuk diolah sesuai dengan peraturan yang berlaku. Selain itu, Bank Sinarmas juga berinisiatif melakukan sosialisasi penerapan konsep *paperless* dalam kegiatan operasional untuk mengurangi penggunaan kertas.

## WASTE MANAGEMENT [OJK F.13][OJK F.14]

Bank Sinarmas' operational banking activities do not generate any hazardous waste. Nevertheless, office activities still produce dry waste such as paper and wet waste such as food scraps. The waste is then managed by the building to be processed in accordance with applicable regulations. Additionally, Bank Sinarmas also took the initiative to socialize the implementation of the paperless concept in operational activities to reduce paper usage.

| Uraian | 2024 | 2023 | 2022 | Description |
|---|---|---|---|---|
| Jumlah Limbah Kertas (Ton) | 4,53 | 3,75 | 1,71 | Total Paper Waste (Tons) |

## KEANEKARAGAMAN HAYATI [OJK F.9][OJK F.10]

Sejauh ini, wilayah kegiatan operasional Bank tidak berada pada lokasi yang berdekatan atau bersinggungan dengan area yang dilindungi maupun kawasan yang memiliki keanekaragaman hayati tinggi. Namun begitu, Bank senantiasa mendukung adanya pelaksanaan *Green Office* dan tersedianya ruang terbuka hijau di lingkungan operasional Bank serta melakukan kegiatan pelestarian lingkungan sebagai berikut:

- Program Diseminasi Aplikasi Olah Limbah Peternakan dan Sampah Organik Basis Teknologi Konsorsium MOL Biotaro untuk Pangan Sehat di Kabupaten Gianyar, Bali
- Penanaman Bibit Bambu di Area sekitar Pabrik Tjiwi Kimia oleh Bank Sinarmas KC Mojokerto

## BIODIVERSITY [OJK F.9][OJK F.10]

So far, the Bank's operational areas are not located near to or adjacent to protected areas or areas with high biodiversity. Nonetheless, the Bank consistently supports the implementation of Green Office and the availability of green open spaces in the Bank's operational environment and carries out environmental conservation activities as follows:

- Disseminating Livestock Waste and Organic Waste Processing Applications based on MOL Biotaro Consortium Technology for Healthy Food in Gianyar Regency, Bali
- Planting Bamboo Seedlings in the Area around the Tjiwi Kimia Factory by Bank Sinarmas KC Mojokerto

## REALISASI BIAYA TJSL [OJK F.4]

Rincian biaya kegiatan untuk kegiatan Tanggung Jawab Sosial dan Lingkungan (TJSL) tahun 2024 adalah sebagai berikut:

## REALIZATION OF TJSL COSTS [OJK F.4]

Details of activity costs for Social and Environmental Responsibility (CSER) activities in 2024 are as follows:

| Uraian | 2024 | 2023 | 2022 | Description |
|---|---|---|---|---|
| Sosial dan Kemasyarakatan | Rp1.785.555.503 | Rp2.482.888.766 (Konvensional/ Conventional) Rp331.500.000 (UUS) | Rp2.171.537.156 (Konvensional/ Conventional) Rp223.556.000 (UUS) | Social and Community |
| Kesehatan dan Keselamatan kerja (K3) | Rp27.000.000 | Rp18.802.500 (Konvensional/ Conventional) | Rp18.000.000 (Konvensional/ Conventional) | Occupational Health and Safety (OHS) |
| Pendidikan | Rp187.217.761 | Rp157.290.000 (Konvensional/ Conventional) Rp21.528.780 (UUS) | Rp190.996.800 (Konvensional/ Conventional) Rp20.535.000 (UUS) | Education |
| Lingkungan hidup | Rp397.005.558 | Rp303.387.000 (Konvensional/ Conventional) | Rp297.135.000 (Konvensional/ Conventional) | Environment |

# LEMBAR UMPAN BALIK
## Feedback Form

Setelah membaca Laporan Tahunan PT. Bank Sinarmas Tbk., kami mohon kesediaan para pemangku kepentingan untuk memberikan umpan balik dengan mengirim e-mail.

After reading the Annual Report of PT. Bank Sinarmas Tbk., we kindly request stakeholders to provide feedback by sending an email.

| Pertanyaan<br>Questions | Setuju<br>Agree | Tidak Setuju<br>Disagree |
|---|---|---|
| Laporan ini telah memberikan informasi yang bermanfaat mengenai kinerja ekonomi, sosial, dan lingkungan Bank.<br>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.<br>Data and information disclosed are easy to understand, complete, transparent, and balanced. | | |
| Data dan informasi yang disajikan berguna dalam pengambilan keputusan.<br>Data and information presented are useful for making decision. | | |
| Laporan ini menarik dan mudah dibaca.<br>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).

- ☐ Nilai Ekonomi Langsung yang Dihasilkan dan Distribusikan<br>Direct Economic Value Generated and Distributed
- ☐ Digitalisasi Produk dan Layanan<br>Product and Service Digitalization
- ☐ Anti-Fraud, Anti-Korupsi, dan APU-PPT<br>Anti-fraud, Anti-Corruption, and AML-CTF
- ☐ Privasi Nasabah<br>Customer Privacy
- ☐ Pengembangan Kompetensi Karyawan<br>Employee Competency Development
- ☐ Literasi dan Inklusi Keuangan<br>Financial Literacy and Inclusion
- ☐ Penggunaan Energi<br>Energy Usage
- ☐ Penggunaan Kertas<br>Paper Usage

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/Companny .....

Kontak (telepon, e-mail) / Contact (Phone, e-mail) .....

**Kategori Pemangku Kepentingan** | Category of Stakeholder

| | | | |
|---|---|---|---|
| Pemerintah \| Government | Pelanggan \| Customer | Karyawan \| Employee | Mitra Kerja \| Business Partners |
| Media | Masyarakat \| Community | LSM \| NGO | Lain-Lain, .... \| Others |

Saran dan tanggapan yang Anda berikan atas informasi yang disajikan dalam laporan ini mohon dikirimkan kepada:

Please send your suggestion and response to the information presented in this report to:


**Retno Tri Wulandari**

Sekretaris Perusahaan
Corporate Secretary

Sinar Mas Land Plaza Tower I, Lt. 1 & 2
Jl. MH Thamrin Kav. 51 Jakarta 10350
T: +62 21 3199 0101
F: +62 21 3199 0401

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# TANGGAPAN TERHADAP UMPAN BALIK TAHUN SEBELUMNYA [OJK G.4]

## Response to Feedback from Previous Year's Sustainability Report

Bank Sinarmas tidak menerima umpan balik atau masukan dari pemangku kepentingan terkait Laporan Tahunan dan Keberlanjutan untuk tahun buku 2023. Akan tetapi, Bank berkomitmen untuk memaksimalkan kualitas penyampaian Laporan Tahunan dan Laporan Keberlanjutan setiap tahun buku.

Bank Sinarmas did not receive feedback or input from stakeholders regarding the Annual and Sustainability Reports for the fiscal year 2023. However, the Bank is committed to maximizing the quality of the Annual and Sustainability Reports each fiscal year.

# INDEKS ISI GRI - DENGAN REFERENSI
## GRI Content Index – with Reference

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| Pernyataan penggunaan<br>Statement of use | PT Bank Sinarmas Tbk telah melaporkan informasi yang dikutip dalam indeks GRI ini untuk periode 1 Januari-31 Desember 2024 dengan mengacu pada Standar GRI<br>PT Bank Sinarmas Tbk has reported the information cited in this GRI content index for the period January 1st- December 31st 2024 **with reference** to the GRI Standards. |
| GRI 1 used | GRI 1: Foundation 2021 |



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# LAPORAN KEUANGAN
Financial Statements

# PT Bank Sinarmas Tbk
# Dan Entitas Anak/*And Subsidiary*

Laporan Keuangan Konsolidasian/
*Consolidated Financial Statements*
Untuk Tahun-tahun yang Berakhir pada
Tanggal 31 Desember 2024 dan 2023/
*For the Years Ended as at*
*December 31, 2024 and 2023*

**PT BANK SINARMAS TBK DAN ENTITAS ANAK/*AND SUBSIDIARY***
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MIRAWATI SENSI IDRIS

Registered Public Accountants
Branch Business License No. 327/KM.1/2025

**Branch Office:**
EightyEight@Kasablanka Office, 20th Floor Unit A
Jl. Casablanca, Kav. 88, Menteng Dalam, Tebet
Jakarta Selatan - 12870
INDONESIA

T +62-21-2283 6086
F +62-21-2283 6096

MOORE

## Laporan Auditor Independen

**No. 00123/3.0478/AU.1/07/1671-2/1/III/2025**

**Pemegang Saham, Dewan Komisaris dan Direksi**

**PT Bank Sinarmas Tbk**

**Opini**

Kami telah mengaudit laporan keuangan konsolidasian PT Bank Sinarmas Tbk dan Entitas Anak ("Grup"), yang terdiri dari laporan posisi keuangan konsolidasian tanggal 31 Desember 2024, serta laporan laba rugi dan penghasilan komprehensif lain konsolidasian, laporan perubahan ekuitas konsolidasian, dan laporan arus kas konsolidasian untuk tahun yang berakhir pada tanggal tersebut, serta catatan atas laporan keuangan konsolidasian, termasuk informasi kebijakan akuntansi material.

Menurut opini kami, laporan keuangan konsolidasian terlampir menyajikan secara wajar, dalam semua hal yang material, posisi keuangan konsolidasian Grup tanggal 31 Desember 2024, serta kinerja keuangan konsolidasian dan arus kas konsolidasiannya 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. Tanggung jawab kami menurut standar tersebut diuraikan lebih lanjut dalam paragraf Tanggung Jawab Auditor terhadap Audit atas Laporan Keuangan Konsolidasian pada laporan kami. Kami independen terhadap Grup berdasarkan ketentuan etika yang relevan dalam audit kami atas laporan keuangan konsolidasian 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 audit kami.

## Independent Auditors' Report

**No. 00123/3.0478/AU.1/07/1671-2/1/III/2025**

**The Shareholders, Board of Commisioners and Directors**

**PT Bank Sinarmas Tbk**

**Opinion**

We have audited the accompanying consolidated financial statements of PT Bank Sinarmas Tbk and Subsidiary (the "Group"), which comprise the consolidated statement of financial position as at December 31, 2024, and the consolidated statement of profit and loss and other comprehensive income, consolidated statement of changes in equity, and consolidated statement of cash flows for the year then ended, and notes to the consolidated financial statements, including material accounting policy information.

In our opinion, the accompanying consolidated financial statements present fairly, in all material respects, the consolidated financial position of the Group as at December 31, 2024, and its consolidated financial performance and consolidated cash flows for the year then ended, in accordance with Indonesian Financial Accounting Standards.

**Basis for Opinion**

We conducted our audit in accordance with Standards on Auditing established by the Indonesian Institute of Certified Public Accountants. Our responsibilities under those standards are further described in the Auditors' Responsibilities for the Audit of the Consolidated Financial Statements paragraph of our report. We are independent of the Group in accordance with the ethical requirements that are relevant to our audit of the consolidated financial statements in Indonesia, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

**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 konsolidasian periode kini. Hal-hal tersebut disampaikan dalam konteks audit kami atas laporan keuangan konsolidasian secara keseluruhan, dan dalam merumuskan opini kami atas laporan keuangan konsolidasian terkait, kami tidak menyatakan suatu opini terpisah atas hal audit utama tersebut.

Hal-hal audit utama yang teridentifikasi dalam audit kami diuraikan sebagai berikut:

**Cadangan Kerugian Penurunan Nilai atas Kredit yang Diberikan dan Piutang/Pembiayaan Syariah**

Seperti yang dijelaskan dalam Catatan 2 - Ikhtisar Kebijakan Akuntansi dan Pelaporan Keuangan Material, Catatan 3 - Penggunaan Estimasi, Pertimbangan, dan Asumsi Manajemen, Catatan 9 - Kredit yang Diberikan dan Piutang/Pembiayaan Syariah, dan Catatan 45 - Tujuan dan Kebijakan Manajemen Risiko Keuangan, atas laporan keuangan konsolidasian, penentuan cadangan kerugian penurunan nilai membutuhkan pertimbangan manajemen yang subjektif dan melibatkan penggunaan estimasi dengan tingkat ketidakpastian yang tinggi. Cadangan kerugian penurunan nilai atas kredit konvensional yang diberikan ditentukan oleh Grup berdasarkan kerangka Kerugian Kredit Ekspektasian ("KKE") sesuai dengan Pernyataan Standar Akuntansi Keuangan (PSAK) No. 109, "Instrumen Keuangan" ("PSAK 109"). Cadangan kerugian penurunan nilai atas piutang/pembiayaan syariah dibentuk atas piutang *murabahah* dan piutang non-*murabahah*. Cadangan kerugian penurunan nilai atas piutang *murabahah* ditentukan berdasarkan PSAK 402 - Akuntansi *Murabahah* ("PSAK 402") dan cadangan kerugian penurunan nilai atas piutang non-*murabahah* ditentukan berdasarkan PSAK yang berlaku.

Pada tanggal 31 Desember 2024, cadangan kerugian penurunan nilai atas kredit yang diberikan dan piutang/pembiayaan syariah Grup adalah sebesar Rp1,549,516 juta.

Kami fokus pada area ini karena penentuan cadangan kerugian penurunan nilai membutuhkan pertimbangan manajemen yang subjektif dan melibatkan penggunaan estimasi dengan tingkat ketidakpastian yang tinggi. Nilai atas kredit yang diberikan dan piutang/pembiayaan syariah - bruto mewakili 26% dari total aset Grup dan besarnya nilai cadangan kerugian penurunan nilai yang dibentuk atas kredit yang diberikan dan piutang/pembiayaan syariah tersebut nilainya signifikan terhadap laporan keuangan Grup.

***Key Audit Matters***

Key audit matters are those matters that in our professional judgment, were of most significance in our audit of the consolidated financial statements of the current period. These matters were addressed in the context of our audit of the consolidated financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

The key audit matters identified in our audit are described as follows:

**Allowance for Impairment Losses for Loan and Receivable/Sharia Financing**

As described in Note 2 - Summary of Material Accounting and Financial Reporting Policies, Note 3 - Management Use of Estimates, Judgments and Assumptions, Note 9 - Loans and Receivables/Sharia Financing, and Note 45 - Financial Risk Management Objectives and Policies, to the consolidated financial statements, determining allowance for impairment losses involves subjective management judgment and is subject to a high degree of estimation uncertainty. The allowance for impairment losses on conventional loans is determined by the Group based on the Expected Credit Losses ("ECL") framework under Statements of Financial Accounting Standards (SFAS) No. 109, "Financial Instruments" ("SFAS 109"). The allowance for impairment losses on receivable/sharia financing is provided on *murabahah* and non-*murabahah* receivables. The allowance for impairment losses on *murabahah* receivables is determined based on SFAS 402 - Accounting of *Murabahah* ("SFAS 402") and allowance for impairment losses on non-*murabahah* receivables is determined based on the applicable SFAS.

As at December 31, 2024, allowance for impairment losses on loans and receivables/sharia financing of the Group amounted to Rp1,549,516 million.

We focused on this area because allowance for impairment losses involves subjective management judgment and is subject to a high degree of estimation uncertainty. The value of the loans and receivables/sharia financing - gross represents 26% of the Group's total assets and the respective allowance for impairment losses provided against the loan and sharia receivables/financing is significant in value to the Group's financial statements.

Grup menghitung cadangan kerugian penurunan nilai untuk kredit yang diberikan baik yang tidak mengalami penurunan nilai dan yang mengalami penurunan nilai. Untuk kredit diberikan yang tidak mengalami penurunan nilai dan kredit diberikan yang mengalami penurunan nilai, yang secara individual tidak dianggap signifikan, Grup menghitung KKE secara kolektif menggunakan model parameter risiko yang menggunakan beberapa parameter utama, antara lain, *Probability of Default* ("PD"), *Loss Given Default* ("LGD"), *Exposure at Default* ("EAD") dan tingkat diskonto, setelah memperhitungkan informasi perkiraan masa depan dan data eksternal lainnya. Grup menghitung cadangan kerugian penurunan nilai atas piutang pembiayaan syariah secara kolektif menggunakan model parameter risiko dengan menggunakan parameter utama yaitu PD, LGD dan *Days Past Due* ("DPD"). Untuk piutang *murabahah*, parameter utama yang digunakan adalah PD dan LGD, sedangkan untuk piutang non-murabahah, parameter utama yang digunakan adalah DPD. Untuk kredit yang diberikan dan piutang/pembiayaan syariah yang mengalami penurunan nilai, yang secara individual dianggap signifikan, Grup menghitung cadangan kerugian penurunan nilai secara individual dengan mengestimasi arus kas ekspektasian yang diperoleh dari kredit yang diberikan dan piutang/pembiayaan syariah.

The Group calculated the allowance for impairment losses for both non-credit-impaired and credit-impaired loans. For non-credit-impaired loans and for credit-impaired loans which are not considered individually significant, the Group assesses collective ECL using the risk parameter modelling approach that incorporates key parameters, including Probability of Default ("PD"), Loss Given Default ("LGD"), Exposure at Default ("EAD") and discount rate, after considering forward-looking information and other external information. The Group assesses the allowance for impairment losses on sharia financing receivables collectively using the risk parameter modelling approach that incorporates key parameters, including PD, LGD and Days Past Due ("DPD"). For *murabahah* receivables, the key parameters used are PD and LGD, while for non-murabahah receivables, the key parameter used is DPD. For credit-impaired loan and receivables/sharia financing, which are considered individually significant, the Group assesses the allowance for impairment losses on an individual basis by estimating the expected cash flows that will be obtained from the loan and receivables/sharia financing.

Pertimbangan-pertimbangan signifikan yang digunakan dalam menentukan cadangan kerugian penurunan nilai atas kredit yang diberikan dan piutang/pembiayaan syariah meliputi:

- Mengembangkan model penilaian kolektif yang tepat untuk menghitung cadangan kerugian penurunan nilai. Model yang dikembangkan secara kompleks dan melibatkan pertimbangan manajemen dalam menyusun model tersebut;
- Mengidentifikasi akun yang telah mengalami peningkatan risiko kredit secara signifikan untuk kredit konvensional dan penurunan nilai pada piutang/pembiayaan syariah; dan
- Asumsi-asumsi yang digunakan dalam model cadangan kerugian penurunan nilai termasuk proyeksi arus kas masa depan yang diharapkan, perkiraan faktor ekonomi makro masa depan dan beberapa skenario probabilitas tertimbang.

The significant judgments involved in determining the allowance for impairment losses on loans and receivables/sharia financing include the following:

- Developing an appropriate collective assessment models to calculate allowance for impairment losses. The model developed is complex and involves management's consideration in developing the model;
- Identification of accounts that have experienced a significant increase in credit risk on conventional loans and experienced impairment for sharia financing receivables; and
- Assumptions used in the allowance for impairment losses model include cash flow projections, forecasts of future macroeconomic factors and several weighted probability scenarios.

Kami telah melakukan prosedur berikut untuk merespons hal audit utama ini:

- Kami menguji desain dan efektivitas pengoperasian pengendalian utama di seluruh proses siklus pinjaman, dibantu oleh spesialis teknologi informasi kami, dan menilai metodologi pengukuran penurunan nilai, validasi model penyisihan kerugian penurunan nilai, input, dasar dan asumsi yang digunakan oleh Grup dalam menghitung penyisihan kerugian penurunan nilai.

We have performed the following procedures to address this key audit matter:

- We tested the design and operating effectiveness of key controls across the loan cycle processes, as assisted by our information technology specialist, and assessed the impairment measurement methodologies, validation of allowance for impairment losses models, inputs, basis and assumptions used by the Group in calculating the allowance for impairment losses.

- Kami menilai estimasi arus kas masa depan pada sampel pinjaman yang dinilai secara individual dengan membandingkan asumsi yang dibuat dengan informasi yang diperoleh dari sumber internal dan eksternal dan menilai keandalan informasi yang digunakan dalam estimasi, berdasarkan informasi pasar yang tersedia atau penilaian yang disiapkan oleh penilai independen.

- We assessed the estimates of future cash flows on a sample of individually assessed loans by comparing assumptions made with information obtained from internal and external sources and assessing the reliability of information used in the estimates, based on available market information or valuation prepared by independent valuer.

- Kami melibatkan profesional di bidang risiko kredit dan teknologi informasi dengan keterampilan khusus, pengetahuan industri, dan pengalaman relevan yang membantu dalam mengevaluasi metodologi dan penilaian utama yang digunakan dalam menentukan parameter PD dan LGD, mengevaluasi bagaimana faktor-faktor *forward-looking* digabungkan dalam model ECL kolektif dan menghitung ulang penilaian penurunan nilai secara kolektif berdasarkan sampel.

- We involved credit risk and information technology professionals with specialized skills, industry knowledge and relevant experience who assisted in evaluating the methodology and key judgments used in determining the PD and LGD parameters, evaluating how forward-looking factors was incorporated in the collective ECL model and recalculating the collective impairment assessment on a sample basis.

- Kami melakukan prosedur loan review, berdasarkan sampel minimal 70% dari total pinjaman dan menyertakan setidaknya 25 debitur terbesar dalam portofolio, untuk mengevaluasi apakah kualitas kredit telah dinilai dengan baik oleh Grup.

- We performed loan review procedures on a sample basis of minimum 70% of the total loans and include at least the top 25 of the biggest debtors in the portfolio, to evaluate whether the credit rating has been properly assessed by the Group.

- Kami menguji perhitungan untuk eksposur yang dinilai secara individual dengan reviu teratur atas risiko kredit.

- We tested the calculations for exposures assessed on an individual basis with timely review of credit risk.

- Kami memeriksa keakurasian matematis dari perhitungan jumlah cadangan kerugian penurunan nilai, dengan melakukan perhitungan ulang atas seluruh portofolio yang penurunan nilainya dinilai secara kolektif berdasarkan sample dan perhitungan ulang atas penurunan nilai yang dinilai secara individual berdasarkan sampel.

- We checked the mathematical accuracy of the calculation of the amount of allowance for impairment losses, by recalculating the entire portfolio whose impairment is assessed collectively based on the sample and recalculating impairment which is assessed individually based on the sample.

**Informasi Lain**

Manajemen bertanggung jawab atas informasi lain. Informasi lain terdiri dari informasi yang tercantum dalam Laporan Tahunan pada tanggal 31 Desember 2024 dan untuk tahun yang berakhir pada tanggal tersebut, tetapi tidak mencantumkan laporan keuangan konsolidasian dan laporan auditor kami. Laporan Tahunan diharapkan akan tersedia bagi kami setelah tanggal laporan auditor ini.

Opini kami atas laporan keuangan tidak mencakup informasi lain, dan oleh karena itu, kami tidak menyatakan bentuk keyakinan apapun atas informasi lain tersebut.

**Other Information**

Management is responsible for the other information. The other information comprises the information included in the Annual Report as at December 31, 2024 and for the year then ended, but does not include the consolidated financial statements and our auditors' report thereon. The Annual Report is expected to be made available to us after the date of this auditors' report.

Our opinion on the financial statements does not cover the other information, and accordingly, we do not express any form of assurance conclusion thereon.

Sehubungan dengan audit kami atas laporan keuangan, tanggung jawab kami adalah untuk membaca informasi lain yang teridentifikasi di atas, jika tersedia dan, dalam melaksanakannya, mempertimbangkan apakah informasi lain mengandung ketidakkonsistensian material dengan laporan keuangan konsolidasian atau pemahaman yang kami peroleh selama audit, atau mengandung kesalahan penyajian material.

In connection with our audit of the financial statements, our responsibility is to read the other information identified above when it becomes available and, in doing so, consider whether the other information is materially inconsistent with the consolidated financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated.

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 mengambil tindakan tepat berdasarkan Standar Audit yang ditetapkan oleh Institut Akuntan Publik Indonesia.

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 in accordance with Standards on Auditing established by the Indonesian Institute of Certified Public Accountants.

**Tanggung Jawab Manajemen dan Pihak yang Bertanggung Jawab atas Tata Kelola Perusahaan terhadap Laporan Keuangan**

Manajemen bertanggung jawab atas penyusunan dan penyajian wajar laporan keuangan tersebut sesuai dengan Standar Akuntansi Keuangan di Indonesia, dan atas pengendalian internal yang dianggap perlu oleh manajemen untuk memungkinkan penyusunan laporan keuangan yang bebas dari kesalahan penyajian material, baik yang disebabkan oleh kecurangan maupun kesalahan.

**Responsibilities of Management and Those Charged with Governance for the Financial Statements**

Management is responsible for the preparation and fair presentation of the financial statements in accordance with Indonesian Financial Accounting Standards, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

Dalam penyusunan laporan keuangan, manajemen bertanggung jawab untuk menilai kemampuan Grup 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 Grup atau menghentikan operasi, atau tidak memiliki alternatif yang realistis selain melaksanakannya.

In preparing the financial statements, management is responsible for assessing the Group'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 Group or to cease operations, or has no realistic alternative but to do so.

Pihak yang bertanggung jawab atas tata kelola bertanggung jawab untuk mengawasi proses pelaporan keuangan Grup.

Those charged with governance are responsible for overseeing the Group's financial reporting process.

**Tanggung Jawab Auditor terhadap Audit atas Laporan Keuangan Konsolidasian**

Tujuan kami adalah untuk memeroleh keyakinan memadai tentang apakah laporan keuangan konsolidasian secara keseluruhan bebas dari kesalahan penyajian material, baik yang disebabkan oleh kecurangan maupun kesalahan, dan untuk menerbitkan laporan auditor yang mencakup opini kami. Keyakinan memadai merupakan suatu tingkat keyakinan tinggi, namun bukan merupakan suatu jaminan bahwa audit yang dilaksanakan berdasarkan Standar Audit 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 secara agregat, dapat diekspektasikan secara wajar akan memengaruhi keputusan ekonomi yang diambil oleh pengguna berdasarkan laporan keuangan konsolidasian tersebut.

**Auditors' Responsibilities to the Audit of the Consolidated Financial Statements**

Our objectives are to obtain reasonable assurance about whether the consolidated financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditors' 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 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 consolidated financial statements.

Sebagai bagian dari suatu audit berdasarkan Standar Audit, 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, merancang dan melaksanakan prosedur audit yang responsif terhadap risiko tersebut, serta memperoleh bukti audit yang cukup dan tepat untuk menyediakan basis bagi opini kami. Risiko tidak terdeteksinya 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 pengendalian internal.

- Memperoleh suatu pemahaman tentang pengendalian internal yang relevan dengan audit untuk merancang prosedur audit yang tepat sesuai dengan kondisinya, tetapi bukan untuk tujuan menyatakan opini atas keefektivitasan pengendalian internal Grup.

- 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 Grup untuk mempertahankan kelangsungan usahanya. Ketika kami menyimpulkan bahwa terdapat suatu ketidakpastian material, kami diharuskan untuk menarik perhatian dalam laporan auditor kami ke pengungkapan terkait dalam laporan keuangan konsolidasian atau, jika pengungkapan tersebut tidak memadai, harus menentukan apakah perlu untuk memodifikasi opini kami. Kesimpulan kami didasarkan pada bukti audit yang diperoleh hingga tanggal laporan auditor kami. Namun, peristiwa atau kondisi masa depan dapat menyebabkan Grup tidak dapat mempertahankan kelangsungan usaha.

- Mengevaluasi penyajian, struktur, dan isi laporan keuangan konsolidasian secara keseluruhan, termasuk pengungkapannya, dan apakah laporan keuangan mencerminkan transaksi dan peristiwa yang mendasarinya dengan suatu cara yang mencapai penyajian wajar.

As part of an audit in accordance with Standards on Auditing, 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 those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

- 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 Group'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 Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditors' report to the related disclosures in the consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditors' report. However, future events or conditions may cause the Group to cease to continue as a going concern.

- Evaluate the overall presentation, structure and content of the consolidated financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

- Memeroleh bukti audit yang cukup dan tepat terkait informasi keuangan entitas atau aktivitas bisnis dalam Grup untuk menyatakan opini atas laporan keuangan konsolidasian. Kami bertanggung jawab atas arahan, supervisi dan pelaksanaan audit grup. Kami tetap bertanggung jawab sepenuhnya atas opini audit kami.

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 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 dalam laporan auditor kami, kecuali peraturan perundang-undangan melarang pengungkapan publik tentang hal tersebut atau ketika, dalam kondisi yang sangat jarang terjadi, kami menentukan bahwa suatu hal tidak boleh dikomunikasikan dalam laporan kami karena konsekuensi merugikan dari mengomunikasikan hal tersebut akan diekspektasikan secara wajar melebihi manfaat kepentingan publik atas komunikasi tersebut.

- Obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group to express an opinion on the consolidated financial statements. We are responsible for the direction, supervision and performance of the group audit. We remain solely responsible for our audit opinion.

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 these matters in our auditors' report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

**MIRAWATI SENSI IDRIS**

00123

**Denny Susanto**
Izin Akuntan Publik No. AP.1671/
*Certified Public Accountant License No. AP.1671*

26 Maret 2025/*March 26, 2025*

bank sinarmas

SURAT PERNYATAAN DIREKSI
TENTANG TANGGUNG JAWAB ATAS
LAPORAN KEUANGAN KONSOLIDASIAN
UNTUK TAHUN-TAHUN YANG BERAKHIR
31 DESEMBER 2024 DAN 2023

**PT. Bank Sinarmas Tbk dan Entitas Anak**

Kami yang bertanda tangan di bawah ini:

1. Nama/*Name* : **Frenky Tirtowijoyo**
   Alamat Kantor/*Office address* : Sinar Mas Land Plaza Tw. 1 Lt. 8
   Jl. MH Thamrin No. 51, Jakarta Pusat

   Alamat Domisili/sesuai KTP atau
   Kartu identitas lain/*Residential Address/in accordance with Personal Identity Card* : Jl. Semboja No. 1A, RT/RW 001/006
   Kel. Petojo Utara, Kec. Gambir, Jakarta Pusat

   Nomor Telepon/*Telephone number* : 021-31990101
   Jabatan/*Title* : Direktur Utama / *President Director*

2. Nama/*Name* : **Enny Kamal**
   Alamat Kantor/*Office address* : Sinar Mas Land Plaza Tw. 1 Lt. 8
   Jl. MH Thamrin No. 51, Jakarta Pusat

   Alamat Domisili/sesuai KTP atau
   Kartu identitas lain/*Residential Address/in accordance with Personal Identity Card* : Jl. B. Katamso P. Baru II No.258 R/22
   RT/RW 001/020, Kel. Kampung Baru
   Kec. Medan Maimun, Medan

   Nomor Telepon/*Telephone number* : 021-31990101
   Jabatan/*Title* : Direktur / *Director*

menyatakan bahwa:

1. Bertanggung jawab atas penyusunan dan penyajian laporan keuangan konsolidasian Perusahaan tanggal 31 Desember 2024 dan untuk tahun-tahun yang berakhir pada tanggal tersebut.

2. Laporan keuangan konsolidasian Perusahaan tersebut telah disusun dan disajikan sesuai dengan Standar Akuntansi Keuangan di Indonesia.

DIRECTORS' STATEMENT
ON THE RESPONSIBILITY FOR
THE CONSOLIDATED FINANCIAL
STATEMENTS FOR THE YEARS ENDED
DECEMBER 31, 2024 AND 2023

**PT. Bank Sinarmas Tbk and Subsidiaries**

We, the undersigned:

declare that:

1. We are responsible for the preparation and presentation of the Company's consolidated financial statements as at December 31, 2024 and for the years ended.

2. The Company's consolidated financial statements have been prepared and presented in accordance with Indonesian Financial Accounting Standards.

**PT. Bank Sinarmas Tbk.**
Sinar Mas Land Plaza Menara 1 Lt. 1 & 2
Jl. MH. Thamrin No. 51, Gondangdia Menteng, Jakarta Pusat 10350
Telp. 021-31990101, Fax. 021-31990401

3. a. Semua informasi dalam laporan keuangan konsolidasian Perusahaan tersebut telah dimuat secara lengkap dan benar, dan

   b. Laporan keuangan konsolidasian Perusahaan tersebut tidak mengandung informasi atau fakta material yang tidak benar, dan tidak menghilangkan informasi atau fakta material.

4. Bertanggung jawab atas sistem pengendalian internal dalam Perusahaan.

Demikian pernyataan ini dibuat dengan sebenarnya.

3. a. All information has been fully and correctly disclosed in the Company's consolidated financial statements, and

   b. The Company's consolidated financial statements do not contain materially misleading information or facts, and do not conceal any information or facts.

4. We are responsible for the Company's internal control system.

This statement has been made truthfully.

26 Maret 2025/*March 26, 2025*




**Frenky Tirtowijoyo**
Direktur Utama/*President Director*

**Enny Kamal**
Direktur/*Director*

**PT BANK SINARMAS TBK DAN ENTITAS ANAK**
**Laporan Posisi Keuangan Konsolidasian**
**Tanggal 31 Desember 2024**
**(Angka-angka disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)**

**PT BANK SINARMAS TBK AND SUBSIDIARY**
**Consolidated Statements of Financial Position**
**As at December 31, 2024**
**(Figures are presented in million Rupiah, unless otherwise stated)**

| | 2024 | Catatan/ *Notes* | 2023 | |
|---|---|---|---|---|
| **ASET** | | | | **ASSETS** |
| Kas dan setara kas | 509.207 | | 388.102 | Cash and cash equivalent |
| Giro pada Bank Indonesia | 5.706.437 | 4 | 6.022.812 | Demand deposits with Bank Indonesia |
| Giro pada bank lain - pihak ketiga | 2.021.554 | 5 | 2.656.867 | Demand deposits with other banks - third parties |
| Cadangan kerugian penurunan nilai | (565) | | (932) | Allowance for impairment losses |
| Jumlah - bersih | 2.020.989 | | 2.655.935 | Net |
| Penempatan pada Bank Indonesia dan bank lain | 8.726.115 | 6 | 6.263.389 | Placements with Bank Indonesia and other banks |
| Cadangan kerugian penurunan nilai | (139) | | (12) | Allowance for impairment losses |
| Jumlah - bersih | 8.725.976 | | 6.263.377 | Net |
| Efek-efek | | 7 | | Securities |
| Pihak berelasi | 1.079.140 | | 1.140.803 | Related parties |
| Pihak ketiga | 21.044.135 | | 16.991.268 | Third parties |
| Jumlah | 22.123.275 | | 18.132.071 | Total |
| Cadangan kerugian penurunan nilai | (245) | | (269) | Allowance for impairment losses |
| Jumlah - bersih | 22.123.030 | | 18.131.802 | Net |
| Efek-efek yang dibeli dengan janji jual kembali - pihak ketiga | 193.748 | 8 | - | Securities purchased under agreements to resell - third parties |
| Bunga diterima dimuka yang belum diamortisasi | (1.533) | | - | Unamortized interest received |
| Jumlah - bersih | 192.215 | | - | Net |
| Kredit yang diberikan dan piutang/ pembiayaan syariah | | 9 | | Loans and receivables/sharia financing |
| Pihak berelasi | 297.395 | | 211.039 | Related parties |
| Pihak ketiga | 14.058.408 | | 16.660.407 | Third parties |
| Jumlah | 14.355.803 | | 16.871.446 | Total |
| Cadangan kerugian penurunan nilai | (1.549.516) | | (1.686.246) | Allowance for impairment losses |
| Jumlah - bersih | 12.806.287 | | 15.185.200 | Net |
| Tagihan akseptasi | | 10 | | Acceptances receivable |
| Pihak ketiga | 38.144 | | 79.864 | Third parties |
| Cadangan kerugian penurunan nilai | (15) | | (1.560) | Allowance for impairment losses |
| Jumlah - bersih | 38.129 | | 78.304 | Net |
| Pendapatan yang masih akan diterima | 405.091 | 11 | 326.751 | Accrued income |
| Biaya dibayar dimuka | 611.977 | 12 | 921.948 | Prepaid expenses |
| Aset tetap - setelah dikurangi akumulasi penyusutan sebesar Rp1.892.373 dan Rp1.631.510 masing-masing pada tanggal 31 Desember 2024 dan 2023 | 1.555.763 | 13 | 1.606.075 | Property and equipment - net of accumulated depreciation of Rp1,892,373 and Rp1,631,510 as at December 31, 2024 and 2023, respectively |
| Aset Ijarah - setelah dikurangi akumulasi penyusutan sebesar Rp68.202 dan Rp119.251, masing-masing pada tanggal 31 Desember 2024 dan 2023 | 292.544 | 15 | 384.218 | Ijarah assets - net of accumulated depreciation of Rp68,202 and Rp119,251 as at December 31, 2024 and 2023, respectively |
| Aset pajak tangguhan - bersih | 261.361 | 35 | 214.568 | Deferred tax assets - net |
| Aset lain-lain - bersih | 375.427 | 16 | 455.904 | Other assets - net |
| **JUMLAH ASET** | **55.624.433** | | **52.634.996** | **TOTAL ASSETS** |

Lihat Catatan atas laporan keuangan konsolidasian yang merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian.

See accompanying notes to the consolidated financial statements which are an integral part of the consolidated financial statements.

**PT BANK SINARMAS TBK DAN ENTITAS ANAK**
**Laporan Posisi Keuangan Konsolidasian**
**Tanggal 31 Desember 2024**
**(Angka-angka disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)**

**PT BANK SINARMAS TBK AND SUBSIDIARY**
**Consolidated Statements of Financial Position**
**As at December 31, 2024**
**(Figures are presented in million Rupiah, unless otherwise stated)**

| | 2024 | Catatan/ *Notes* | 2023 | |
|---|---|---|---|---|
| **LIABILITAS, DANA SYIRKAH TEMPORER DAN EKUITAS** | | | | **LIABILITIES, TEMPORARY SYIRKAH FUNDS AND EQUITY** |
| **Liabilitas** | | | | **Liabilities** |
| Liabilitas segera | 178.778 | 17 | 167.982 | Liabilities immediately payable |
| Simpanan | | 18 | | Deposits |
| Pihak berelasi | 5.634.290 | | 5.918.217 | Related parties |
| Pihak ketiga | 32.263.125 | | 29.224.368 | Third parties |
| Jumlah | 37.897.415 | | 35.142.585 | Total |
| Simpanan dari bank lain | | 19 | | Deposits from other banks |
| Pihak ketiga | 66.760 | | 327.445 | Third parties |
| Efek-efek yang dijual dengan janji beli kembali - pihak ketiga | 879.455 | 20 | 1.051.717 | Securities sold under agreements to repurchase - third parties |
| Utang pajak | 52.719 | 21 | 52.572 | Taxes payable |
| Liabilitas akseptasi | 38.160 | 10 | 79.880 | Acceptances payable |
| Beban yang masih harus dibayar | 44.216 | 22 | 43.816 | Accrued expenses |
| Liabilitas imbalan kerja jangka panjang | 44.749 | 41 | 35.426 | Long-term employee benefits liability |
| Obligasi subordinasi - bersih | 497.505 | 24 | 496.512 | Subordinated bonds - net |
| Liabilitas lain-lain | 399.533 | 23 | 390.973 | Other liabilities |
| **Jumlah Liabilitas** | **40.099.290** | | **37.788.908** | **Total Liabilities** |
| **Dana Syirkah Temporer** | | 25 | | **Temporary Syirkah Funds** |
| Simpanan | | | | Deposits |
| Pihak berelasi | 195.989 | | 899.014 | Related parties |
| Pihak ketiga | 6.726.560 | | 6.104.537 | Third parties |
| Jumlah | 6.922.549 | | 7.003.551 | Total |
| Simpanan dari bank lain | | | | Deposits from other banks |
| Pihak ketiga | 2.972 | | 15.769 | Third parties |
| **Jumlah Dana Syirkah Temporer** | **6.925.521** | | **7.019.320** | **Total Temporary Syirkah Funds** |
| **Ekuitas** | | | | **Equity** |
| Modal saham - nilai nominal Rp 100 (dalam Rupiah penuh) per saham<br>Modal dasar - 60.000.000.000 saham<br>Modal ditempatkan dan disetor - 19.716.162.403 saham dan 19.716.162.403 saham masing-masing pada tanggal 31 Desember 2024 dan 2023 | 1.971.616 | 27 | 1.971.616 | Capital stock - Rp 100 (in full Rupiah) par value per share<br>Authorized - 60,000,000,000 shares<br>Issued and paid-up shares 19,716,162,403 and 19,716,162,403 shares as of December 31, 2024 and 2023, respectively |
| Tambahan modal disetor - bersih | 3.552.194 | 27 | 3.552.194 | Additional paid-in capital - net |
| Komponen ekuitas lainnya | 502.000 | 7,14 | 588.242 | Other equity components |
| Saldo laba | | | | Retained earnings |
| Ditentukan penggunaannya | 10.000 | 42 | 9.500 | Appropriated |
| Tidak ditentukan penggunaannya | 1.996.630 | | 1.705.216 | Unappropriated |
| | 2.006.630 | | 1.714.716 | |
| Kepentingan non-pengendali | 567.182 | 26 | - | Non-controlling interests |
| **Jumlah Ekuitas** | **8.599.622** | | **7.826.768** | **Total Equity** |
| **JUMLAH LIABILITAS, DANA SYIRKAH TEMPORER DAN EKUITAS** | **55.624.433** | | **52.634.996** | **TOTAL LIABILITIES, TEMPORARY SYIRKAH FUNDS AND EQUITY** |

Lihat Catatan atas laporan keuangan konsolidasian yang merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian.

See accompanying notes to the consolidated financial statements which are an integral part of the consolidated financial statements.

**PT BANK SINARMAS TBK DAN ENTITAS ANAK**
**Laporan Laba Rugi dan Penghasilan Komprehensif Konsolidasian**
**Untuk Tahun-tahun yang Berakhir 31 Desember 2024 dan 2023**
**(Angka-angka disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)**

**PT BANK SINARMAS TBK AND SUBSIDIARY**
**Consolidated Statements of Profit or Loss And Other Comprehensive Income**
**For the Years Ended December 31, 2024 and 2023**
**(Figures are presented in million Rupiah, unless otherwise stated)**

| | 2024 | Catatan/ *Notes* | 2023 | |
|---|---|---|---|---|
| **PENDAPATAN DAN BEBAN OPERASIONAL** | | | | **OPERATING REVENUES AND EXPENSES** |
| Pendapatan bunga | 3.018.913 | 29 | 2.781.795 | Interest revenues |
| Pendapatan syariah | 769.990 | 29 | 734.016 | Sharia income |
| Beban bunga | (829.608) | 30 | (632.923) | Interest expense |
| Beban syariah | (360.487) | 30 | (259.569) | Sharia expenses |
| Pendapatan Bunga dan Bagi Hasil - Bersih | 2.598.808 | | 2.623.319 | Interest Revenues and Profit Sharing Income - Net |
| Pendapatan Operasional Lainnya | | | | Other Operating Revenues |
| Provisi dan komisi selain dari kredit | 502.363 | 2 | 425.536 | Fees and commissions other than from loans |
| Keuntungan kurs mata uang asing - bersih | 104.588 | | 76.312 | Gain on foreign exchange - net |
| Keuntungan dari kenaikan nilai wajar efek-efek yang diukur melalui laba rugi - bersih | 5.052 | 7 | 67.541 | Gain on increase in fair value of securities at fair value through profit and loss - net |
| Keuntungan dari penjualan efek-efek yang diukur melalui laba rugi - bersih | 146.827 | 7 | - | Gain on sale of fair value of securities at fair value through profit and loss - net |
| Penerimaan kembali aset yang telah dihapusbukukan | 197.929 | | 123.196 | Recovery of written-off assets |
| Lain-lain | 19.589 | 33 | 233.480 | Others |
| Jumlah Pendapatan Operasional | 3.575.156 | | 3.549.384 | Total Operating Revenues |
| Beban Operasional Lainnya | | | | Other Operating Expenses |
| Kerugian penurunan nilai aset keuangan | 43.538 | | 895.494 | Impairment losses on financial assets |
| Umum dan administrasi | 1.456.772 | 31 | 1.196.199 | General and administrative expenses |
| Tenaga kerja | 1.282.509 | 32 | 1.018.965 | Personnel expenses |
| Penyusutan aset tetap dan aset hak guna | 295.164 | 13 | 267.244 | Depreciation - property and equipment and right of use assets |
| Biaya komisi | 42.719 | | 33.303 | Commission expense |
| Kerugian dari penjualan efek-efek yang diukur melalui laba rugi - bersih | - | | 7.725 | Loss on sale of fair value of securities at fair value through profit and loss - net |
| Lain-lain | 15.638 | 34 | 56.876 | Others |
| Jumlah Beban Operasional | 3.136.340 | | 3.475.806 | Total Operating Expenses |
| **LABA SEBELUM PAJAK** | 438.816 | | 73.578 | **PROFIT BEFORE TAX** |
| **BEBAN PAJAK** | | 35 | | **TAX EXPENSE** |
| Kini | 94.150 | | 78.960 | Current |
| Tangguhan | (25.471) | | (1.904) | Deferred |
| Penyesuaian tahun lalu | - | | (79.274) | Previous year adjustment |
| | 68.679 | | (2.218) | |
| **LABA BERSIH** | 370.137 | | 75.796 | **PROFIT FOR THE YEAR** |
| **PENGHASILAN (RUGI) KOMPREHENSIF LAIN** | | | | **OTHER COMPREHENSIVE INCOME (LOSS)** |
| Pos yang akan direklasifikasi ke laba rugi | | | | Item that will be reclassified subsequently to profit or loss |
| Penghasilan (rugi) yang belum direalisasi atas perubahan nilai wajar dari efek-efek yang diukur melalui penghasilan komprehensif lain | (107.352) | 7 | 368.028 | Unrealized gain (loss) on change in fair value of securities at fair value through other comprehensive income |
| Pajak sehubungan dengan pos yang akan direklasifikasi | 21.110 | 35 | 15.211 | Tax relating to items that will be reclassified |
| | (86.242) | | 383.239 | |
| Pos yang tidak akan direklasifikasi ke laba rugi - bersih setelah dampak pajak tangguhan | | | | Items that will not be reclassified to profit or loss |
| Revaluasi aset tetap | - | 13 | 86.375 | Gain on revaluation of property and equipment |
| Pengukuran kembali liabilitas imbalan kerja jangka panjang | 857 | 41 | (4.217) | Remeasurement of long-term employee benefits liability |
| Pajak sehubungan dengan pos yang tidak akan direklasifikasi | 212 | 35 | 567 | Tax relating to items that will not be reclassified |
| | 1.069 | | 82.725 | |
| **JUMLAH LABA (RUGI) KOMPREHENSIF LAIN** | (85.173) | | 465.964 | **TOTAL OTHER COMPREHENSIVE INCOME (LOSS)** |
| **JUMLAH LABA (RUGI) KOMPREHENSIF** | 284.964 | | 541.760 | **TOTAL COMPREHENSIVE INCOME (LOSS)** |
| **LABA YANG DAPAT DIATRIBUSIKAN KEPADA:** | | | | **PROFIT ATTRIBUTABLE TO:** |
| Pemilik entitas induk | 290.845 | 36 | 75.796 | Owners of the Parent Company |
| Kepentingan non-pengendali | 79.292 | 26 | - | Non-controlling interests |
| | 370.137 | | 75.796 | |
| **TOTAL LABA (RUGI) KOMPREHENSIF YANG DAPAT DIATRIBUSIKAN KEPADA:** | | | | **COMPREHENSIVE INCOME (LOSS) ATTRIBUTABLE TO:** |
| Pemilik entitas induk | 205.672 | | 541.760 | Owners of the Parent Company |
| Kepentingan non-pengendali | 79.292 | 26 | - | Non-controlling interests |
| | 284.964 | | 541.760 | |
| **LABA BERSIH PER SAHAM (dalam Rupiah penuh)** | | | | **EARNINGS PER SHARE (in full Rupiah)** |
| Dasar | 14,75 | 36 | 3,84 | Basic |

Lihat Catatan atas laporan keuangan konsolidasian yang merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian.

See accompanying notes to the consolidated financial statements which are an integral part of the consolidated financial statements.

**PT BANK SINARMAS TBK DAN ENTITAS ANAK**
**Laporan Perubahan Ekuitas Konsolidasian**
**Untuk Tahun-tahun yang Berakhir 31 Desember 2024 dan 2023**
**(Angka-angka disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)**

**PT BANK SINARMAS TBK AND SUBSIDIARY**
**Consolidated Statements of Changes in Equity**
**For the Years Ended December 31, 2024 and 2023**
**(Figures are presented in million Rupiah, unless otherwise stated)**

| | Catatan/ *Notes* | Modal Saham/ *Capital Stock* | Tambahan Modal Disetor - Bersih/ *Addition Paid in Capital* | Komponen Ekuitas Lainnya/*Other Equity Components* | | Saldo Laba/*Retained Earnigs* | | Kepentingan Non-Pengendali/ *Non-Controlling Interests* | Jumlah Ekuitas/ *Total Equity* |
|---|---|---|---|---|---|---|---|---|---|
| | | | | Laba (Rugi) yang Belum Direalisasi atas Perubahan Nilai Wajar Efek/ *Unrealized Gain (Loss) on Change in Fair Value of Securities* | Surplus Revaluasi Aset Tetap/ *Revaluation Surplus of Property and Equipment* | Ditentukan Penggunaanya/ *Appropriated* | Tidak Ditentukan Penggunaanya/ *Unappropriated* | | |
| Saldo pada tanggal 1 Januari 2023/ *Balance as of January 1, 2023* | | 1.971.616 | 3.552.194 | (275.115) | 393.743 | 9.000 | 1.633.570 | - | 7.285.008 |
| Pembentukan cadangan umum/ *Appropriation for general reserve* | 42 | - | - | - | - | 500 | (500) | - | - |
| Laba tahun berjalan/ *Profit for the year* | | - | - | - | - | - | 75.796 | - | 75.796 |
| Penghasilan (rugi) komprehensif lain/ *Other comprehensive income (loss)* | | | | | | | | | |
| Rugi yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain - bersih/ *Unrealized loss on change in fair value of securities measured at fair value through other comprehensive income - net* | 7,35 | - | - | 383.239 | - | - | - | - | 383.239 |
| Pengukuran kembali liabilitas imbalan kerja jangka panjang - bersih/ *Remeasurement of long - term employee benefits liability - net* | 35,41 | - | - | - | - | - | (3.650) | - | (3.650) |
| Surplus revaluasi aset tetap/ *Revaluation surplus of property & equipment* | 13 | - | - | - | 86.375 | - | - | - | 86.375 |
| Saldo pada tanggal 31 Desember 2023/ *Balance as of December 31, 2023* | | 1.971.616 | 3.552.194 | 108.124 | 480.118 | 9.500 | 1.705.216 | - | 7.826.768 |

Lihat Catatan atas laporan keuangan konsolidasian yang merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian.

See accompanying notes to the consolidated financial statements which are an integral part of the consolidated financial statements.

| | Catatan/ *Notes* | Modal Saham/ *Capital Stock* | Komponen Ekuitas Lainnya/*Other Equity Components* | | | Saldo Laba/*Retained Earnigs* | | Kepentingan Non-Pengendali/ *Non-Controlling Interests* | Jumlah Ekuitas/ *Total Equity* |
|---|---|---|---|---|---|---|---|---|---|
| | | | Tambahan Modal Disetor - Bersih/ *Addition Paid in Capital* | Laba (Rugi) yang Belum Direalisasi atas Perubahan Nilai Wajar Efek/ *Unrealized Gain (Loss) on Change in Fair Value of Securities* | Surplus Revaluasi Aset Tetap/ *Revaluation Surplus of Property and Equipment* | Ditentukan Penggunaanya/ *Appropriated* | Tidak Ditentukan Penggunaanya/ *Unappropriated* | | |
| Saldo pada tanggal 1 Januari 2024/ *Balance as of January 1, 2024* | | 1.971.616 | 3.552.194 | 108.124 | 480.118 | 9.500 | 1.705.216 | - | 7.826.768 |
| Pembentukan cadangan umum/ *Appropriation for general reserve* | 42 | - | - | - | - | 500 | (500) | - | - |
| Laba tahun berjalan/ *Profit for the year* | | - | - | - | - | - | 290.845 | 79.292 | 370.137 |
| Penghasilan (rugi) komprehensif lain/ *Other comprehensive income (loss)* | | | | | | | | | |
| Rugi yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain - bersih/ *Unrealized loss on change in fair value of securities measured at fair value through other comprehensive income - net* | 7,35 | - | - | (86.242) | - | - | - | - | (86.242) |
| Pengukuran kembali liabilitas imbalan kerja jangka panjang/ *Remeasurement of long - term employee benefits liability - net* | 35,41 | - | - | - | - | - | 1.069 | - | 1.069 |
| Efek pemisahan Unit Usaha Syariah/ *Effect of Spin-off Sharia Unit* | 26 | - | - | - | - | - | - | 487.890 | 487.890 |
| Saldo pada tanggal 31 Desember 2024/ *Balance as of December 31, 2024* | | 1.971.616 | 3.552.194 | 21.882 | 480.118 | 10.000 | 1.996.630 | 567.182 | 8.599.622 |

Lihat Catatan atas laporan keuangan konsolidasian yang merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian.

See accompanying notes to the consolidated financial statements which are an integral part of the consolidated financial statements.

**PT BANK SINARMAS TBK DAN ENTITAS ANAK**
**Laporan Arus Kas Konsolidasian**
**Untuk Tahun-tahun yang Berakhir**
**31 Desember 2024 dan 2023**
**(Angka-angka disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)**

**PT BANK SINARMAS TBK AND SUBSIDIARY**
**Consolidated Statements of Cash Flow**
**For the Years Ended**
**December 31, 2024 and 2023**
**(Figures are presented in million Rupiah, unless otherwise stated)**

| | 2024 | Catatan/ *Notes* | 2023 | |
|---|---|---|---|---|
| **ARUS KAS DARI AKTIVITAS OPERASI** | | | | **CASH FLOWS FROM OPERATING ACTIVITIES** |
| Pendapatan bunga | 3.046.518 | 11,29 | 2.766.341 | Interest revenues |
| Pendapatan syariah | 957.469 | 11,29 | 825.965 | Sharia income |
| Pendapatan operasional lainnya | 866.018 | 33 | 658.322 | Other operating income |
| Beban bunga | (828.863) | 22,30 | (622.726) | Interest expenses |
| Beban syariah | (359.839) | 22,30 | (254.037) | Sharia expenses |
| Kerugian selisih kurs mata uang asing - bersih | (142.485) | | 228.376 | Loss on foreign exchange - net |
| Pembayaran pajak penghasilan badan | (107.492) | 35 | (189.791) | Payment of corporate income tax |
| Beban umum dan administrasi | (1.448.940) | 31 | (1.199.899) | General and administrative expenses |
| Beban tenaga kerja | (1.282.509) | 32 | (1.018.965) | Salaries expense |
| Beban operasional lainnya | (123.910) | 34 | (248.442) | Other operational expenses |
| Arus kas operasional sebelum perubahan aset dan liabilitas operasi | 575.967 | | 945.144 | Operating cash flow before changes in operating assets and liabilities |
| Penurunan (kenaikan) aset operasi: | | | | Decrease (increase) in operating assets : |
| Efek-efek | (4.096.893) | 7 | 943.036 | Securities |
| Efek yang dibeli dengan janji dijual kembali | (192.215) | 8 | - | Securities purchased under agreements to resell |
| Kredit yang diberikan | 416.647 | 9 | (508.345) | Loans |
| Pembiayaan syariah | 1.993.407 | 9 | (2.000.631) | Sharia financing |
| Pembayaran tagihan akseptasi | 41.720 | 10 | (1.882) | Payment of acceptance receivables |
| Biaya dibayar dimuka | 309.971 | 12 | 357.505 | Prepaid expenses |
| Aset ijarah | (201.750) | 15 | (85.805) | Ijarah assets |
| Aset lain-lain | (17.689) | 16 | 25.120 | Other assets |
| Kenaikan (penurunan) liabilitas operasi: | | | | Increase (decrease) in operating liabilities : |
| Liabilitas segera | 13.677 | 17 | 36.037 | Liabilities immediately payable |
| Simpanan | 2.754.830 | 18 | 2.745.559 | Deposits |
| Simpanan dari bank lain | (260.685) | 19 | 313.296 | Deposits from other banks |
| Utang pajak | 13.489 | 35 | 4.557 | Taxes payable |
| Efek yang dijual dengan janji beli kembali | (172.262) | 20 | 1.051.717 | Securities sold under agrements to repurchase |
| Liabilitas akseptasi | (41.720) | 10 | 1.815 | Acceptances payables |
| Liabilitas lain-lain | 122.419 | 23 | 300.664 | Other liabilities |
| Kenaikan (penurunan) dana syirkah temporer: | | 25 | | Increase (decrease) in syirkah temporary funds: |
| Simpanan | (81.002) | | 686.542 | Deposits |
| Simpanan dari bank lain | (12.797) | | (185.634) | Deposits from other banks |
| Kas Bersih Diperoleh dari Aktivitas Operasi | 1.165.114 | | 4.628.695 | Net Cash Provided by Operating Activities |
| **ARUS KAS DARI AKTIVITAS INVESTASI** | | | | **CASH FLOWS FROM INVESTING ACTIVITIES** |
| Hasil penjualan aset tetap | 767 | 13 | 824 | Proceeds from sale of property and equipment |
| Perolehan aset tetap | (152.885) | 13 | (189.091) | Acquisitions of property and equipment |
| Kas Bersih Digunakan untuk Aktivitas Investasi | (152.118) | | (188.267) | Net Cash Used in Investing Activities |
| **ARUS KAS DARI AKTIVITAS PENDANAAN** | | | | **CASH FLOWS FROM FINANCING ACTIVITIES** |
| Pembayaran liabilitas sewa | (117.903) | 23 | (111.120) | Payment from lease liabilities |
| Penerimaan dari penyertaan kepemilikan dari non-pengendali | 490.000 | 26 | - | Receipts from non-controlling ownership interests |
| Kas Bersih Diperoleh dari (Digunakan untuk) Aktivitas Pendanaan | 372.097 | | (111.120) | Net Cash Provided by (Used for) Financing Activities |
| **KENAIKAN BERSIH KAS DAN SETARA KAS** | 1.385.093 | | 4.329.308 | **NET INCREASE IN CASH AND CASH EQUIVALENTS** |
| **KAS DAN SETARA KAS AWAL TAHUN** | 15.331.170 | | 11.042.096 | **CASH AND CASH EQUIVALENTS AT THE BEGINNING OF THE YEAR** |
| Pengaruh perubahan kurs mata uang asing | 247.050 | | (40.234) | Effect on foreign exchange rate changes |
| **KAS DAN SETARA KAS AKHIR TAHUN** | 16.963.313 | | 15.331.170 | **CASH AND CASH EQUIVALENTS AT END OF THE YEAR** |
| **PENGUNGKAPAN TAMBAHAN** | | | | **SUPPLEMENTAL DISCLOSURES** |
| Kas dan Setara Kas terdiri dari: | | | | Cash and Cash Equivalents Consist of : |
| Kas | 509.207 | | 388.102 | Cash |
| Giro pada Bank Indonesia | 5.706.437 | 4 | 6.022.812 | Demand deposits with Bank Indonesia |
| Giro pada bank lain | 2.021.554 | 5 | 2.656.867 | Demand deposits with other banks |
| Penempatan pada Bank Indonesia dan bank lain - jangka waktu jatuh tempo tiga bulan atau kurang sejak tanggal perolehan | 8.726.115 | 6 | 6.263.389 | Placements with Bank Indonesia and other bank - original maturities of three months or less from the acquisition date |
| Jumlah Kas dan Setara Kas | 16.963.313 | | 15.331.170 | Total Cash and Cash Equivalents |

Lihat Catatan atas laporan keuangan konsolidasian yang merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian.

See accompanying notes to the consolidated financial statements which are an integral part of the consolidated financial statements.

## 1. Umum

### a. Pendirian dan Informasi Umum

PT Bank Sinarmas Tbk ("Perusahaan") didirikan pada tahun 1989 dengan nama PT Bank Shinta Indonesia, berdasarkan Akta No. 52 tanggal 18 Agustus 1989 dari Buniarti Tjandra, S.H., notaris di Jakarta, dan telah diubah dengan Akta No. 91 tanggal 15 September 1989 dari notaris yang sama. Akta pendirian ini telah mendapat pengesahan dari Menteri Kehakiman Republik Indonesia melalui Surat Keputusan No. C2-9142.HT.01.01-TH.89 tanggal 27 September 1989 dan diumumkan dalam Berita Negara Republik Indonesia No. 49 tanggal 21 Juni 2005, Tambahan No. 6448.

Pada tanggal 26 Januari 2007, Perusahaan berganti nama menjadi PT Bank Sinarmas. Perubahan nama tersebut telah disetujui melalui Rapat Umum Pemegang Saham Luar Biasa Perusahaan yang didokumentasikan dalam Akta No. 1 tanggal 21 November 2006 dari Triphosa Lily Ekadewi, S.H., notaris di Jakarta. Perubahan Anggaran Dasar tersebut telah memperoleh persetujuan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Keputusannya No. W7-03960 HT.01.04-TH.2006 tanggal 20 Desember 2006. Perubahan nama tersebut juga telah mendapat persetujuan dari Bank Indonesia berdasarkan Keputusan Gubernur Bank Indonesia No.9/4/KEP.GBI/2007 tanggal 22 Januari 2007 tentang Perubahan Izin Usaha Atas Nama PT Bank Shinta Indonesia menjadi Izin Usaha Atas Nama PT Bank Sinarmas.

Berdasarkan Akta No. 1 tanggal 8 Oktober 2009 dari Endang Saritomo Utari, S.H., notaris di Jakarta, terdapat perubahan Anggaran Dasar dalam rangka melaksanakan kegiatan usaha berdasarkan prinsip perbankan syariah dan perpanjangan masa jabatan direksi dan komisaris. Perubahan ini telah disetujui oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dalam Surat Keputusan No. AHU-AH.01.10-22484. Tahun 2009 tanggal 11 Desember 2009.

## 1. General

### a. Establishment and General Information

PT Bank Sinarmas Tbk ("the Company") was established in 1989 as PT Bank Shinta Indonesia, based on Notarial Deed No. 52 dated August 18, 1989 of Buniarti Tjandra, S.H., public notary in Jakarta, as amended by Notarial Deed No. 91 dated September 15, 1989, of the same notary. The Deed of Establishment was approved by the Minister of Justice of the Republic of Indonesia in his Decision Letter No. C2-9142.HT.01.01-TH.89 dated September 27, 1989 and published in Supplement No. 6448 of the State Gazette of the Republic of Indonesia No. 49 dated June 21, 2005.

On January 26, 2007, the Company has changed its name into PT Bank Sinarmas. The said change was approved during the Extraordinary General Meeting of stockholders of the Company which resolution was stated in Notarial Deed No. 1 dated November 21, 2006 of Triphosa Lily Ekadewi, S.H., public notary in Jakarta. The amendment to the Articles of Association was approved by the Minister of Law and Human Rights of the Republic of Indonesia in his Decision Letter No. W7-03960 HT.01.04-TH.2006 dated December 20, 2006. Such change in name was approved by Bank Indonesia based on its Decision Letter No. 9/4/KEP.GBI/2007 dated January 22, 2007, wherein the Business License Under the Name of PT Bank Shinta Indonesia was changed to Business License Under the Name of PT Bank Sinarmas.

In accordance with the Notarial Deed No. 1 dated October 8, 2009 of Endang Saritomo Utari, S.H., public notary in Jakarta, there are changes to the Articles of Association in order to carry out business activities based on sharia banking principles and the extension of terms of office of the directors and commissioners. These amendments were approved by the Minister of Law and Human Rights of the Republic of Indonesia in his Decree No. AHU-AH.01.10-22484. Tahun 2009 dated December 11, 2009.

Berdasarkan Rapat Umum Pemegang Saham (RUPS) tanggal 6 April 2010 yang didokumentasikan dalam Akta No. 31 tanggal 6 April 2010 dari Sutjipto, S.H., Mkn, notaris di Jakarta, pemegang saham menyetujui pemecahan nilai nominal saham Perusahaan dari Rp500.000 (dalam Rupiah penuh) per saham menjadi Rp100 (dalam Rupiah penuh) per saham dan perubahan status Perusahaan menjadi Perusahaan Terbuka (Tbk) dengan nama PT Bank Sinarmas Tbk. Perubahan tersebut telah mendapat pengesahan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Keputusan No. AHU-22745.AH.01.02 Tahun 2010 tanggal 4 Mei 2010 serta telah dilaporkan kepada Bank Indonesia melalui surat No. SKL.121/2010/ PRESDIR-CorpSec tanggal 7 Mei 2010.

In the General Stockholders ' Meeting (GSM) held on April 6, 2010, which was stated in the Deed. No. 31 dated April 6, 2010 from Sutjipto, SH., Mkn, public notary in Jakarta, the Shareholders approved splitting the number of shares from Rp500,000 (in full Rupiah) per share into Rp100 (in full Rupiah) per share and changing the status of the Company to become a Public Company under the name PT Bank Sinarmas Tbk. These changes were approved by the Ministry of Law and Human Rights of the Republic of Indonesia in his Decision Letter No. AHU-22745.AH.01.02 Tahun 2010 dated May 4, 2010 and were reported to Bank Indonesia by Letter No. SKL.121/2010/ PRESDIR-CorpSec dated May 7, 2010.

Anggaran Dasar Perusahaan telah mengalami beberapa kali perubahan, dimana perubahan terakhir dilakukan dengan Akta No. 37 tanggal 28 Oktober 2024, yang dibuat di hadapan Notaris Aulia Taufani, S.H. Perubahan tersebut telah disetujui oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dalam Surat Keputusan No. AHU-AH.01.09-0268849 tanggal 29 Oktober 2024.

The articles of association have been amended several times, with the latest amendment effected by Notarial Deed No. 37 dated October 28, 2024 of Aulia Taufani, S.H. The amendment has been approved by the Minister of Law and Human Rights of the Republic of Indonesia in Decree No. AHU-AH.01.09-0268849 dated October 29, 2024.

Kantor pusat Perusahaan beralamat di Sinarmas Land Plaza, Menara I, Jln. M.H. Thamrin No. 51, Jakarta. Perusahaan memiliki 1 kantor cabang utama, 67 kantor cabang, 62 kantor fungsional operasional, 10 kantor fungsional Usaha Mikro dan Kecil (UMK), 192 kantor cabang pembantu, dan 3 mobil kas keliling yang semuanya berlokasi di Indonesia.

The Company's head office is located at Sinarmas Land Plaza, Tower I, Jln. M.H. Thamrin No. 51, Jakarta. The Company has 1 main branch, 67 branches, 62 functional sub-branch, 10 functional offices Micro and Small Enterprises (UMK), and 192 sub-branches, 3 cash mobile, all located in Indonesia.

PT Sinar Mas Multiartha (SMMA) Tbk merupakan entitas induk Perusahaan yang didirikan di Indonesia.

PT Sinar Mas Multiartha Tbk (SMMA) is the immediate holding entity of the Company that is incorporated in Indonesia.

Pemegang saham akhir (*ultimate shareholder*) Perusahaan pada tanggal 31 Desember 2024 dan 2023 adalah PT Sinarmas Cakrawala.

As at December 31, 2024 and 2023, the ultimate shareholder of the Company is PT Sinarmas Cakrawala.

Sesuai dengan pasal 3 Anggaran Dasar, maksud dan tujuan didirikannya Perusahaan adalah untuk menjalankan usaha di bidang perbankan.

In accordance with article 3 of the Company's Articles of Association, the purpose and objective establishing the company is to engage in the field of banking.

Perusahaan mulai beroperasi secara komersial pada tanggal 16 Februari 1990, sesuai dengan izin usaha yang diberikan oleh Menteri Keuangan Republik Indonesia dalam Surat Keputusan No. 156/KMK.013/1990 tanggal 16 Februari 1990. Sesuai dengan Surat Keputusan Bank Indonesia No. 27/156/KEP/DIR tanggal 22 Maret 1995, Perusahaan memperoleh peningkatan status menjadi Bank Devisa.

Perusahaan memperoleh izin usaha perbankan berdasarkan prinsip syariah berdasarkan surat keputusan Deputi Gubernur Bank Indonesia No. 11/13/KEP.DpG/2009 tanggal 27 Oktober 2009.

Pada tanggal 30 Januari 2012, Perusahaan memperoleh Surat Keputusan No. KEP-21/BL/2012 dari Ketua Badan Pengawas Pasar Modal dan Lembaga Keuangan mengenai persetujuan Perusahaan sebagai kustodian di pasar modal.

Perusahaan memperoleh izin sebagai wali amanat dari Otoritas Jasa Keuangan (dahulu Badan Pengawas Pasar Modal dan Lembaga Keuangan) berdasarkan Surat Tanda Terdaftar Sebagai Wali Amanat No. 01/BL/STTD-WA/2009 tanggal 27 Agustus 2009.

Kedua izin kegiatan tersebut telah diperbarui sesuai surat Otoritas Jasa Keuangan (OJK) nomor S-682/PM.223/2022 tanggal 22 Agustus 2022.

Pada tanggal 1 Januari 2024, Pemisahan Unit Usaha Syariah PT Bank Sinarmas Tbk telah efektif dilakukan. Dengan dipisahkannya Unit Usaha Syariah, maka selanjutnya Perusahaan tidak lagi melakukan kegiatan usaha syariah, dan telah dilakukan perubahan kegiatan usaha pada Pasal 3 Anggaran Dasar Perusahaan sebagaimana termaktub dalam Akta Pernyataan Keputusan Rapat Perubahan Anggaran Dasar PT Bank Sinarmas Tbk. No. 3 tanggal 2 Januari 2024 yang dibuat di hadapan Aulia Taufani, S.H., Notaris di Jakarta yang telah memperoleh persetujuan sesuai dengan Surat Keputusan Menteri Hukum dan Hak Asasi Manusia Republik Indonesia No. AHU-0000118.AH.01.02 Tahun 2024 tanggal 2 Januari 2024.

The Company started its commercial operations on February 16, 1990, based on the business license granted by the Minister of Finance of the Republic of Indonesia in his Decision Letter No. 156/KMK.013/1990 dated February 16, 1990. Pursuant to Bank Indonesia's Decree No. 27/156/KEP/DIR dated March 22, 1995, the Company is authorized to operate as a Foreign Exchange Bank.

The Company obtained its business license activities to be based on principles of islamic banking through decision letter of Deputy Governor of Bank Indonesia No. 11/13/KEP.DpG/2009 dated October 27, 2009.

On January 30, 2012, the Company received a Decision Letter No. KEP-21/BL/2012 from the Capital Market and Financial Institution Supervisory Agency regarding the approval for the Company as a custodian in capital market.

The Company obtained permission as a trustee from the Financial Services Authority (formerly the Capital Markets and Financial Institutions Supervisory Agency) based on a Certificate of Registration as a Trustee No. 01/BL/STTD-WA/2009 dated August 27, 2009.

Both activity permits have been renewed in accordance with the Financial Services Authority (OJK) letter number S-682/PM.223/2022 dated August 22, 2022.

On January 1, 2024, the separation of PT Bank Sinarmas Tbk's Sharia Business Unit has been effectively carried out. With the separation of the Sharia Business Unit, the Company will no longer carry out sharia business activities, and changes have been made to business activities in Article 3 of the Company's Articles of Association as stipulated in the Deed of Statement of Decision of the Meeting to Amend the Articles of Association of PT Bank Sinarmas Tbk. No. 3 dated January 2, 2024 made before Aulia Taufani, S.H., a Notary in Jakarta who has obtained approval in accordance with the Decree of the Minister of Law and Human Rights Republic of Indonesia No. AHU-0000118. AH.01.02 of 2024 dated January 2, 2024.

**b. Penawaran Umum Efek Perusahaan**

Pada tanggal 29 November 2010, Perusahaan memperoleh pernyataan efektif dari Ketua Badan Pengawas Pasar Modal dan Lembaga Keuangan (Bapepam dan LK) atau sekarang Otoritas Jasa Keuangan (OJK) melalui surat No. S-10683/BL/2010 untuk penawaran umum perdana atas 1.600 lembar saham Perusahaan dengan nilai nominal Rp100 (dalam Rupiah penuh) per saham pada harga penawaran Rp150 (dalam Rupiah penuh) per saham dimana melekat 1.920.000.000 waran Seri I (Catatan 27). Setiap pemegang 5 (lima) saham baru Perusahaan berhak memperoleh 6 (enam) waran dimana setiap 1 (satu) waran memberikan hak kepada pemegangnya untuk membeli 1 (satu) saham baru Perusahaan dengan harga pelaksanaannya sebesar Rp150 (dalam Rupiah penuh) per saham, yang dapat dilakukan mulai tanggal 13 Juni 2011 sampai dengan tanggal 13 Desember 2015.

Penawaran umum perdana (IPO) saham Perusahaan telah mendapat persetujuan dari Bank Indonesia melalui surat No. 12/52/DPB3/TPB 3 - 1 tanggal 5 Agustus 2010. Saham dan waran Perusahaan telah tercatat di Bursa Efek Indonesia pada tanggal 13 Desember 2010.

Pada tanggal 15 Juni 2012, Perusahaan memperoleh Pernyataan Efektif dari Ketua Bapepam dan LK (sekarang OJK) melalui surat No. S-7561/BL/2012 untuk Penawaran Umum Terbatas I (PUT I) kepada Pemegang Saham dengan Hak Memesan Efek Terlebih Dahulu (HMETD) atas 1.203.186.138 lembar Saham Biasa Atas Nama dengan nilai nominal Rp100 (dalam Rupiah penuh) per saham dengan harga pelaksanaan Rp250 (dalam Rupiah penuh) per saham dimana melekat 2.996.614.532 waran Seri II (Catatan 27). Setiap pemegang 400 saham lama berhak atas 53 HMETD untuk membeli 53 saham baru, dimana pada setiap 53 saham baru melekat 132 Waran Seri II yang diberikan oleh Perusahaan secara cuma-cuma. Waran Seri II diberikan sebagai insentif kepada pemegang saham untuk melakukan pembelian saham baru yang bernilai nominal Rp100 (dalam Rupiah penuh) per saham dengan harga pelaksanaan sebesar Rp250 (dalam Rupiah penuh) per saham yang dapat dilakukan mulai dari tanggal 11 Januari 2013 sampai dengan 29 Juni 2017 dimana setiap 1 (satu) Waran Seri II berhak membeli 1 (satu) saham baru pada harga pelaksanaannya.

**b. Public Offering of Shares**

On November 29, 2010, the Company obtained the Notice of Effectivity from the Chairman of the Capital Market and Financial Institutions Supervisory Agency (Bapepam – LK) or currently Financial Services Authority (OJK) in his letter No. S-10683/BL/ 2010 for the initial public offering (IPO) of the 1,600 new shares with par value of Rp100 (in full Rupiah) per share at offering price of Rp150 (in full Rupiah) per share with attached 1,920,000,000 Series I Warrants (Note 27). Each holder of five (5) new shares of the Company is entitled to six (6) warrants where each one (1) warrant entitles the holder to purchase one (1) new share of the Company at exercise price of Rp150 (in full Rupiah) per share, which can be exercised from June 13, 2011 until December 13, 2015.

The Company's Initial Public Offering (IPO) was approved by Bank Indonesia in its Letter No. 12/52/DPB3/TPB 3 - 1 dated August 5, 2010. On December 13, 2010, the Company's shares and warrants have been listed on the Indonesia Stock Exchange.

On June 15, 2012, the Company obtained the Notice of Effectivity from the Chairman Bapepam - LK (now OJK) in his letter No. S-7561/BL/2012 for the Limited Public Offering I (PUT I) with preemptive rights to Stockholders for 1,203,186,138 common shares with par value of Rp100 (in full Rupiah) per share at exercise price of Rp250 (in full Rupiah) per share with attached 2,996,614,532 Series II Warrants (Note 27). Every holder of 400 existing shares has 53 pre-emptive rights to purchase 53 new shares, wherein for every 53 new shares, 132 Series II Warrants is attached, free of charge. Series II Warrants were given as incentives to stockholders to purchase new shares at a par value of Rp100 (in full Rupiah) per share, with exercise price of Rp250 (in full Rupiah) per share, which can be exercised from January 11, 2013 until June 29, 2017, wherein every 1 (one) Series II Warrant is entitled to purchase 1 (one) new share at the exercise price.

Berdasarkan Akta No. 45 tanggal 13 Juni 2014 dari Aryanti Artisari, S.H., M.Kn., notaris di Jakarta, tentang Berita Acara Rapat Umum Pemegang Saham Luar Biasa (RUPSLB), dimana pemegang saham Perusahaan menyetujui untuk menerbitkan 1.312.411.310 lembar saham pada harga yang akan ditentukan oleh Direksi dengan persetujuan Dewan Komisaris melalui Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu (PMTHMETD). Pada tanggal 31 Oktober 2014 dan 24 November 2014, Perusahaan melaksanakan PMTHMETD tahap 1 dan 2 masing-masing sebanyak 888.888.888 dan 7.646.526 lembar saham dengan harga pelaksanaan masing-masing sebesar Rp270 (dalam Rupiah penuh). Jumlah dana yang diperoleh dari pemegang saham dalam pelaksanaan PMTHMETD adalah sebesar Rp242.064.

In accordance with the Notarial Deed No. 45 dated June 13, 2014 of Aryanti Artisari, S.H., M.Kn., public notary in Jakarta, concerning the Extraordinary General Stockholders' Meeting (EGSM), the Company's stockholders approved the issuance of 1,312,411,310 shares at a price to be determined by Directors with approval from Board of Commisioners by "Rights Issue Without Pre-Emptive Rights". On October 31, 2014 and November 24, 2014, the company conducts "Rights Issue Without Pre-Emptive Rights" stages 1 and 2, each totaling 888,888,888 shares and 7,646,526 shares, respectively, at exercise price off Rp270 (in full Rupiah) per share, respectively. The total proceeds in relation to this "Rights Issue Without Pre-Emptive Rights" amounted to Rp242,064.

Pada tanggal 27 April 2016, Perusahaan memperoleh Pernyataan Efektif dari Otoritas Jasa Keuangan melalui surat No. S-202/D.04/2016 untuk Penawaran Umum Terbatas II (PUT II) kepada Pemegang Saham dengan Hak Memesan Efek Terlebih Dahulu (HMETD) atas 1.099.490.445 lembar Saham Biasa Atas Nama dengan nilai nominal Rp100 (dalam Rupiah penuh) per saham dengan harga pelaksanaan Rp400 (dalam Rupiah penuh) per saham dimana melekat 4.397.961.780 waran Seri III. Setiap pemegang 13 saham lama berhak atas 1 HMETD untuk membeli 1 saham baru, dimana pada setiap 1 saham baru melekat 4 Waran Seri III yang diberikan oleh Perusahaan secara cuma-cuma. Waran Seri III diberikan sebagai insentif kepada pemegang saham untuk melakukan pembelian saham baru yang bernilai nominal Rp100 (dalam Rupiah penuh) per saham dengan harga pelaksanaan sebesar Rp625 (dalam Rupiah penuh) per saham yang dapat mulai tanggal 28 November 2016 sampai dengan 12 Mei 2021 dimana setiap 1 (satu) Waran Seri III berhak membeli 1 (satu) saham baru pada harga pelaksanaannya.

On April 27, 2016, the Company obtained the Notice of Effectivity from Financial Services Authority (OJK) in its letter No. S-202/D.04/2016 for the limited initial public offering II (PUT II) with preemptive rights to Stockholders for 1,099,490,445 common shares with par value of Rp100 (in full Rupiah) per share at exercise price of Rp400 (in full Rupiah) per share with attached 4,397,961,780 Series III Warrants. Every holder of 13 existing shares has 1 pre-emptive right to purchase 1 new share, wherein for every 1 new share, 4 Series III Warrants are attached, free of charge. Series III Warrants are given as incentives to stockholders to purchase new shares at a par value of Rp100 (in full Rupiah) per share, with exercise price of Rp625 (in full Rupiah) per share, which can be exercised from November 28, 2016 until May 12, 2021, wherein every 1 (one) Series III Warrant is entitled to purchase 1 (one) new share at the exercise price.

Saham Perusahaan telah tercatat di Bursa Efek Indonesia yaitu sebanyak 19.517.921.842 saham yang mewakili 98,99% dari saham yang beredar pada tanggal 31 Desember 2024 dan 2023.

The Company's issued shares totaling to 19,517,921,842 shares representing 98.99% of its issued shares as of December 31, 2024 and 2023, are listed on the Indonesian Stock Exchange.

**c. Penawaran Umum Obligasi Perusahaan**

Pada tanggal 29 Juni 2022, Perusahaan memperoleh Pernyataan Efektif dari Kepala Eksekutif Pengawas Pasar Modal Otoritas Jasa Keuangan (OJK) melalui suratnya No. S-107/D.04/2022 untuk melaksanakan Penawaran Umum Berkelanjutan Obligasi Subordinasi Berkelanjutan I Bank Sinarmas dengan jumlah pokok obligasi sebanyak-banyaknya Rp3.000.000. Pada Tahap I, Perusahaan menerbitkan dengan jumlah pokok sebesar Rp500.000 dengan tingkat bunga tetap sebesar 6,5% per tahun dengan jangka waktu 5 tahun.

**c. Public Offering of Corporate Bonds**

On June 29, 2022, the Company obtained an Effectivity Statement from the Chief Executive of the Capital Market Supervision of the Financial Services Authority (OJK) through his letter No. S-107/D.04/2022 to carry out the Public Offering of Bank Sinarmas Sustainable Subordinated Bonds I with the maximum principal amount of the bonds of Rp3,000,000. In Phase I, the Company issued amounting to Rp500,000 with fixed interest rate of 6.5% per annum with a term of 5 year maturity date.

**d. Pemisahan Unit Usaha Syariah**

Perusahaan menerima surat dari Otoritas Jasa Keuangan No. SR-1/D.03/2023 tanggal 14 Februari 2023 tentang Persetujuan Prinsip Pendirian PT Bank Nano Syariah (Badan Usaha Syariah hasil pemisahan Unit Usaha Syariah (UUS) PT Bank Sinarmas Tbk).

Perusahaan menerima surat dari Otoritas Jasa Keuangan No. SR-255/PB.02/2023 tanggal 10 November 2023 tentang Keputusan Perpanjangan Jangka Waktu Pelaksanaan Kegiatan Usaha PT Bank Nano Syariah.

Pemisahan Unit Usaha Syariah telah efektif tanggal 1 Januari 2024 dengan pendirian Bank Umum Syariah baru dengan nama PT Bank Nano Syariah.

**d. Spin-Off of Sharia Business Unit**

The Company received a letter from the Financial Services Authority No. SR-1/D.03/2023 dated February 14, 2023 concerning Approval in Principle for the Establishment of PT Bank Nano Syariah (Sharia Business Entity as a result of the separation of the Sharia Business Unit (UUS) of PT Bank Sinarmas Tbk).

The Company received a letter from the Financial Services Authority No. SR-255/PB.02/2023 dated November 10, 2023, regarding the Decision on the Extension of the Implementation Period for the Business Activities of PT Bank Nano Syariah.

The separation of Sharia Business Units has been effective on January 1, 2024 with the establishment of a new Sharia Commercial Bank under the name PT Bank Nano Syariah.

**e. Entitas Anak**

Entitas Anak yang dimiliki oleh Perusahaan pada tanggal 31 Desember 2024 adalah sebagai berikut:

**e. Subsidiary**

The Subsidiary owned by the Company as of December 31, 2024 are as follows:

| Nama/*Name* | Tahun Beroperasi Komersial/*Year of Commercial Operation* | Bidang Usaha/*Nature of Business* | Tempat Kedudukan/ *Domicile* | Persentase Kepemilikan Efektif/*Percentage of Ownership* | Jumlah Aset Sebelum Eliminasi/*Total Assets Before Elimination* |
|---|---|---|---|---|---|
| PT Bank Nano Syariah | 2024 | Perbankan Syariah | Jakarta | 51% | 9.692.526 |

**PT Bank Nano Syariah**

PT Bank Nano Syariah, sebuah perusahaan yang berdomisili di Indonesia dan berlokasi di Jl. Teuku Cik Ditiro No. 29, Kec. Menteng, Jakarta Pusat 10310, bergerak di bidang perbankan dengan prinsip syariah dan telah beroperasi sejak 1 Januari 2024.

**PT Bank Nano Syariah**

PT Bank Nano Syariah, a company domiciled in Indonesia and located at Jl. Teuku Cik Ditiro No. 29, Kec. Menteng, Central Jakarta 10310, is engaged in banking with sharia principles and has been starting January 1, 2024.

Susunan pemegang saham PT Bank Nano Syariah adalah sebagai berikut:

The composition of shareholders of PT Bank Nano Syariah is as follows:

| Pemegang Saham | 1 Januari/*January 1, 2024* Jumlah Lembar Saham/ *Number of Shares* | Persentase Kepemilikan/ *Percentage of Ownership* | Jumlah Modal Disetor/ *Total Paid-up Capital Stock* | Name of Stockholders |
|---|---|---|---|---|
| | | % | Rp | |
| PT Bank Sinarmas Tbk | 5.100.000.000 | 51,00% | 510.000 | PT Bank Sinarmas Tbk |
| PT Sinarmas Multiartha Tbk | 2.500.000.000 | 25,00% | 250.000 | PT Sinarmas Multiartha Tbk |
| PT Asuransi Sinar Mas | 2.400.000.000 | 24,00% | 240.000 | PT Asuransi Sinar Mas |
| **Jumlah** | **10.000.000.000** | **100%** | **1.000.000** | **Total** |

Berdasarkan Akta No. 1 tanggal 2 Januari 2024 yang dibuat di hadapan Aulia Taufani S.H., susunan anggota Dewan Komisaris, Direksi, dan Dewan Pengawas Syariah PT Bank Nano Syariah sebagai berikut:

Based on Deed No. 1 dated January 2, 2024 made before Aulia Taufani S.H., the composition of the Board of Commissioners, Board of Directors, and Sharia Supervisory Board of PT Bank Nano Syariah is as follows:

| | 1 Januari/ *January 1,* 2024 | |
|---|---|---|
| **Dewan Komisaris** | | **Board of Commissioners** |
| Komisaris Utama | The Tjun Hau | President Commissioner |
| Komisaris Independen | Nana Supriana | Independent Commissioner |
| Komisaris Independen | Horas Parsaulian Pardede | Independent Commissioner |
| **Direksi** | | **Board of Directors** |
| Direktur Utama | Halim | President Director |
| Direktur | Soejanto Soetjijo | Director |
| Direktur | Uzan Tedjamulia | Director |
| Direktur | Hanafi Himawan | Director |
| Direktur | Suyono Wijaya | Director |
| **Dewan Pengawas Syariah** | | **Board of Sharia Supervisory** |
| Ketua | Ahmadi Sukarno | Chairman |
| Anggota | Mochammad Bukhori Muslim | Member |

## f. Karyawan, Direksi dan Dewan Komisaris

## f. Employees, Boards of Directors and Boards of Commissioners

Pada tanggal 31 Desember 2024 dan 2023, susunan pengurus Perusahaan adalah sebagai berikut:

As of December 31, 2024 and 2023, the Company's management consists of the following:

| | 2024 | 2023 | |
|---|---|---|---|
| **Dewan Komisaris** | | | **Board of Commissioners** |
| Komisaris Utama | Tjendrawati Widjaja | Tjendrawati Widjaja | President Commissioner |
| Komisaris Independen | Sammy Kristamuljana | Sammy Kristamuljana | Independent Commissioner |
| Komisaris Independen | Rusmin | Rusmin | Independent Commissioner |
| **Direksi** | | | **Board of Directors** |
| Direktur Utama | Frenky Tirtowijoyo | Frenky Tirtowijoyo | President Director |
| Direktur | Miko Andidjaja | Miko Andidjaja | Director |
| Direktur | Ekajaya Ongny Putra | Ekajaya Ongny Putra | Director |
| Direktur | Enny Kamal | Enny Kamal | Director |
| Direktur | Sendy | Sendy | Director |
| Direktur* | Amandalia Johanes | - | Director* |
| Direktur** | - | Halim | Director** |
| Direktur** | - | Hanafi Himawan | Director** |
| Direktur** | - | Soejanto Soetjijo | Director** |
| Direktur** | - | Uzan Tedjamulia | Director** |

*) Pengangkatan Nyonya Amandalia Johanes sebagai Direktur Perseroan terhitung efektif sejak 28 Oktober 2024.
**) The appointment of Mrs. Amandalia Johanes as the Director of the Company is effective from October 28, 2024.*

**) Pada tanggal 1 Januari 2024, komposisi anggota Direksi PT Bank Sinarmas Tbk mengalami perubahan sebagai hasil dari efektifnya permisahan Unit Usaha Syariah.
***) On January 1, 2024, the composition of the Board of Directors of PT Bank Sinarmas Tbk changed as a result of the effective separation of the Sharia Business Unit.*

Susunan keanggotaan komite-komite yang dimiliki Perusahaan pada tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut:

The members of the committees of the Company as at December 31, 2024 and 2023 are as follows:

| | 2024 | 2023 | |
|---|---|---|---|
| **Komite Audit** | | | **Audit Committee** |
| Ketua | Sammy Kristamuljana | Sammy Kristamuljana | Chairman |
| Anggota | Robert A Simanjuntak | Robert A Simanjuntak | Members |
| | Reynold M Batubara | Reynold M Batubara | |
| **Komite Remunerasi dan Nominasi** | | | **Remuneration and Nomination Committee** |
| Ketua | Rusmin | Rusmin | Chairman |
| Anggota | Tjendrawati Widjaja | Tjendrawati Widjaja | Members |
| | Christina Suryadinata | Christina Suryadinata | |
| **Komite Pemantau Risiko** | | | **Risk Monitoring Committee** |
| Ketua | Rusmin | Rusmin | Chairman |
| Anggota | Tjendrawati Widjaja | Tjendrawati Widjaja | Members |
| | Robert A Simanjuntak | Robert A Simanjuntak | |
| | Reynold M Batubara | Reynold M Batubara | |
| **Dewan Pengawas Syariah*** | | | **Sharia Supervisory Board*** |
| Ketua | - | Ahmadi Bin Sukarno | Chairman |
| Anggota | - | Moch.Bukhori Muslim | Member |

*) Dengan efektifnya pemisahan Unit Usaha Syariah Perseroan menjadi PT Bank Nano Syariah sejak 1 Januari 2024, maka Dewan Pengawas Syariah tidak lagi menjabat di Perseroan.

*) *With the effective separation of the Sharia Business Unit of the Company into PT Bank Nano Syariah since January 1, 2024, the Sharia Supervisory Board no longer holds positions in the Company.*

Kepala Audit Internal Perusahaan pada tanggal 31 Desember 2024 dan 2023 adalah Frieda Junia.

As at December 31, 2024 and 2023, the head of the Company's Internal Audit is Frieda Junia.

Sekretaris Perusahaan pada tanggal 31 Desember 2024 dan 2023 adalah Retno Tri Wulandari.

The Company's Corporate Secretary as at December 31, 2024 and 2023, is Retno Tri Wulandari.

Personel manajemen kunci Perusahaan terdiri dari Komisaris, Direksi, *Group Head*, Kepala Kantor Wilayah, Wakil Kepala Kantor Wilayah, Kepala Divisi, Pimpinan Cabang dan Koordinator Pimpinan Cabang Pembantu.

Key management personel of the Company consists of Commissioners, Directors, Group Head, Heads of Regional Offices, Deputy Heads of Regional Offices, Heads of Divisions, Branch Managers and Coordinator Branch Manager.

Jumlah rata-rata karyawan Grup (tidak diaudit) adalah 5.543 dan 5.477, masing-masing untuk periode yang berakhir pada tanggal 31 Desember 2024 dan 2023.

The Group has an average total number of employees (unaudited) of 5,543 and 5,477, for the period ended December 31, 2024 and 2023, respectively.

**g. Penyelesaian Laporan Keuangan Konsolidasian**

**g. Completion of Consolidated Financial Statements**

Laporan keuangan konsolidasian PT Bank Sinarmas Tbk dan Entitas Anak untuk periode yang berakhir 31 Desember 2024 telah diselesaikan dan diotorisasi untuk terbit oleh Direksi Perusahaan pada tanggal 26 Maret 2025. Direksi Perusahaan bertanggung jawab atas penyusunan dan penyajian laporan keuangan tersebut.

The consolidated financial statements of PT Bank Sinarmas Tbk and Subsidiary for the period ended December 31, 2024 were completed and authorized for issuance by the Company's Board of Directors on March 26, 2025. The Company's Board of Directors who are responsible for the preparation and presentation of the financial statements.

## 2. Informasi Kebijakan Akuntansi Material

### a. Dasar Penyusunan dan Pengukuran Laporan Keuangan Konsolidasian

Laporan keuangan konsolidasian disusun dan disajikan dengan menggunakan Standar Akuntansi Keuangan (SAK) di Indonesia, meliputi pernyataan dan interpretasi yang diterbitkan oleh Dewan Standar Akuntansi Keuangan Ikatan Akuntan Indonesia (DSAK IAI) dan Dewan Standar Akuntansi Syariah IAI, dan Peraturan OJK No. VIII.G.7 tentang "Penyajian dan Pengungkapan Laporan Keuangan Emiten atau Perusahaan Publik".

Dasar pengukuran laporan keuangan konsolidasian ini adalah konsep biaya perolehan, kecuali beberapa akun tertentu disusun berdasarkan pengukuran lain, sebagaimana diuraikan dalam kebijakan akuntansi masing-masing akun tersebut. Laporan keuangan konsolidasian ini disusun dengan metode akrual, kecuali laporan arus kas.

Kebijakan akuntansi yang diterapkan dalam penyusunan laporan keuangan konsolidasian untuk periode yang berakhir 31 Desember 2024 adalah konsisten dengan kebijakan akuntansi yang diterapkan dalam penyusunan laporan keuangan untuk tahun yang berakhir 31 Desember 2023.

Laporan arus kas disusun menggunakan metode langsung dan arus kas dikelompokkan atas dasar kegiatan operasi, investasi dan pendanaan. Untuk tujuan penyusunan laporan arus kas konsolidasian, kas dan setara kas mencakup kas, giro pada Bank Indonesia, giro pada bank lain, penempatan pada Bank Indonesia dan bank lain dan efek-efek dengan jatuh tempo tiga bulan atau kurang dan yang tidak dijaminkan serta yang tidak dibatasi pencairannya.

Laporan keuangan Bank Umum Syariah disusun berdasarkan Pernyataan Standar Akuntansi Keuangan (PSAK) No. 401 (Amendemen 2022) "Penyajian Laporan Keuangan Syariah", PSAK No. 402 (Amendemen 2019) "Akuntansi Murabahah", PSAK No. 405 "Akuntansi Mudharabah", PSAK No. 406 "Akuntansi Musyarakah", PSAK No. 407 (Amendemen

## 2. Material Accounting Policy Information

### a. Basis of Consolidated Financial Statements Preparation and Measurement

The consolidated financial statements have been prepared and presented in accordance with Indonesian Financial Accounting Standards ("FAS"), which comprise the statements and interpretations issued by the Board of Financial Accounting Standards of the Indonesian Institute of Accountants (DSAK IAI) and Board of Sharia Accounting of IAI, and OJK Regulation No. VIII.G.7. regarding "Presentation and Disclosures of Public Companies' Financial Statements".

The measurement basis used is the historical cost, except for certain accounts which are measured on the bases described in the related accounting policies. The consolidated financial statements, except for the statements of cash flows, are prepared under the accrual basis of accounting.

The accounting policies adopted in the preparation of the consolidated financial statements for the period ended December 31, 2024 are consistent with those adopted in the preparation of the financial statements for the year ended December 31, 2023.

The statement of cash flows is prepared based on direct method by classifying cash flows on the basis of operating, investing and financing activities. For the purpose of consolidated statements of cash flows, cash and cash equivalents include cash on hand, demand deposits with Bank Indonesia, demand deposits with other banks, and placement with Bank Indonesia and other banks and securities with original maturities of three months or less from the acquisition date and are not used as collateral and are not restricted.

The Sharia Bank's financial statements of Sharia Bank are prepared based on Statement of Financial Accounting Standard (SFAS) No. 401 (Amendment 2022) "Presentation of Sharia Financial Statement", SFAS No. 402 (Amendment 2019) "Murabahah Accounting", SFAS No. 405 "Mudharabah Accounting", SFAS No. 406 "Musyarakah Accounting", SFAS No. 407

2021) "Akuntansi Ijarah", PSAK No. 410 (Amendemen 2020) "Akuntansi Sukuk", Pedoman Akuntansi Perbankan Syariah Indonesia ("PAPSI") dan prinsip-prinsip akuntansi yang berlaku umum yang ditetapkan Ikatan Akuntan Indonesia, mencakup pula pedoman akuntansi dan pelaporan yang ditetapkan oleh Bank Indonesia (BI) dan Otoritas Jasa Keuangan (OJK).

(Amendment 2021) "Ijarah Accounting", SFAS No. 410 (Amendment 2020), "Sukuk Accounting", Accounting Guidelines for Indonesian Sharia Banking ("PAPSI") and general accounting principles assigned by the Indonesian Institute of Accountants, including accounting and reporting principles designated by Bank of Indonesia (BI) and Otoritas Jasa Keuangan (OJK).

Mata uang yang digunakan dalam penyusunan dan penyajian laporan keuangan konsolidasian adalah mata uang Rupiah (Rupiah) yang juga merupakan mata uang fungsional Perusahaan. Rupiah juga merupakan mata uang fungsional entitas anak.

The reporting currency used in the preparation of the consolidated financial statements is the Indonesian Rupiah (Rupiah) which is also the functional currency of the Company. The subsidiary's functional currency is in Rupiah.

**b. Prinsip Konsolidasi**

**b. Principles of Consolidation**

Laporan keuangan konsolidasian meliputi laporan keuangan Perusahaan dan Entitas Anak.

The consolidated financial statements include the financial statements of the Company and its Subsidiary.

Laporan keuangan konsolidasian meliputi laporan keuangan Perusahaan dan Entitas Anak yang dikendalikan oleh Perusahaan dan Entitas Anak (Grup). Pengendalian diperoleh apabila Perusahaan memiliki seluruh hal berikut ini:

Consolidated financial statements include the financial statements of the Company and its Subsidiary controlled by the Company and its Subsidiary (the Group) Control is obtained when the Company has all of the following:

- Kekuasaan atas *investee*;
- Eksposur atau hak atas imbal hasil variabel dari keterlibatannya dengan *investee*; dan
- Kemampuan untuk menggunakan kekuasaannya untuk memengaruhi jumlah imbal hasil investor.

- Authority over the investees;
- Exposure or right to variable returns from its involvement with the investee; and
- Ability to use its authority to influence the amount of investor returns.

Pengonsolidasian Entitas Anak dimulai saat Perusahaan memperoleh pengendalian atas Entitas Anak dan berakhir pada saat Perusahaan kehilangan pengendalian atas Entitas Anak. Secara khusus, penghasilan dan beban Entitas Anak yang diakuisisi atau dilepaskan selama tahun berjalan termasuk dalam laporan laba rugi dan penghasilan komprehensif lain konsolidasian sejak tanggal Perusahaan memperoleh pengendalian sampai dengan tanggal Perusahaan kehilangan pengendalian atas Entitas Anak.

The consolidation of Subsidiary begins when the Company gains control over the Subsidiary and ends when the Company loses control over the Subsidiary Specifically, the income and expenses of the acquired or disposed Subsidiary during the current year are included in the consolidated income statement and other comprehensive income report from the date the Company acquires control until the date the Company loses control over the Subsidiary.

Seluruh aset dan liabilitas, ekuitas, penghasilan, beban, dan arus kas dalam intra kelompok usaha terkait dengan transaksi antar entitas dalam Grup dieliminasi secara penuh dalam laporan keuangan konsolidasian.

All assets and liabilities, equity, income, expenses, and cash flows within the intragroup business related to transactions between entities within the Group are fully eliminated in the consolidated financial statements.

Laba rugi dan setiap komponen penghasilan komprehensif lain diatribusikan kepada pemilik Perusahaan dan kepentingan non-pengendali (KNP) meskipun hal tersebut mengakibatkan KNP memiliki saldo defisit.

KNP disajikan dalam laporan laba rugi dan penghasilan komprehensif lain konsolidasian dan dalam ekuitas pada laporan posisi keuangan konsolidasian, terpisah dari bagian yang dapat diatribusikan kepada pemilik Perusahaan.

Transaksi dengan KNP yang tidak mengakibatkan hilangnya pengendalian dicatat sebagai transaksi ekuitas. Selisih antara nilai wajar imbalan yang dialihkan dengan bagian relatif atas nilai tercatat aset bersih Entitas Anak yang diakuisisi dicatat di ekuitas. Keuntungan atau kerugian dari pelepasan kepada KNP juga dicatat di ekuitas.

Profit and loss and any other components of comprehensive income are attributed to the owners of the Company and non-controlling interests (NCI), even if this results in NCI having a deficit balance.

NCI is presented in the consolidated statement of profit or loss and other comprehensive income, and in the equity section of the consolidated statement of financial position, separate from the portion attributable to the Company's owners

Transactions with NCI that do not result in loss of control are recorded as equity transactions The difference between the fair value of consideration transferred and the relative portion of the carrying amount of net assets of the acquired Subsidiary is recorded in equity. Gains or losses on disposals to NCI are also recorded in equity.

**c. Penjabaran Mata Uang Asing**

**Mata Uang Fungsional dan Pelaporan**

Akun-akun yang tercakup dalam laporan keuangan konsolidasian diukur menggunakan mata uang dari lingkungan ekonomi utama dimana Grup beroperasi (mata uang fungsional).

Laporan keuangan konsolidasian disajikan dalam Rupiah, yang merupakan mata uang fungsional dan mata uang penyajian Perusahaan. Rupiah juga merupakan mata uang fungsional entitas anak.

**Transaksi dan Saldo**

Transaksi dalam mata uang asing dijabarkan ke dalam mata uang fungsional menggunakan kurs pada tanggal transaksi. Keuntungan atau kerugian selisih kurs yang timbul dari penyelesaian transaksi dan dari penjabaran pada kurs akhir tahun atas aset dan liabilitas moneter dalam mata uang asing diakui dalam laba rugi. Aset non-moneter yang diukur pada nilai wajar dijabarkan menggunakan kurs pada tanggal nilai wajar ditentukan.

**c. Foreign Currency Translation**

**Functional and Reporting Currencies**

Items included in the consolidated financial statements are measured using the currency of the primary economic environment in which the Group operates (the functional currency).

The consolidated financial statements are presented in Rupiah which is the Company’s functional and presentation currency. The subsidiary’s functional currency is in Rupiah.

**Transactions and Balances**

Foreign currency transactions are translated into the functional currency using the exchange rates prevailing at the dates of the transactions. Foreign exchange gains and losses resulting from the settlement of such transactions and from the translation at year end exchange rates of monetary assets and liabilities denominated in foreign currencies are recognized in profit or loss. Non-monetary assets that are measured at fair value are translated using the exchange rate at the date that the fair value was determined.

Pada tanggal 31 Desember 2024 dan 2023, kurs konversi yakni kurs Reuters pada pukul 16:00 Waktu Indonesia Barat (WIB), yang digunakan oleh Grup adalah sebagai berikut:

As of December 31, 2024 and 2023, the conversion rates used by the Group for monetary assets and liabilities were the prevailing Reuters spot rate at 16:00 Western Indonesian Time as follows:

| | 2024 (dalam Rupiah penuh)/ *(in full Rupiah)* | 2023 (dalam Rupiah penuh)/ *(in full Rupiah)* | |
|---|---|---|---|
| Poundsterling Inggris | 20.218,54 | 19.626,56 | Great Britain Poundsterling |
| Euro | 16.758,12 | 17.038,32 | Euro |
| Dolar Amerika Serikat | 16.095,00 | 15.397,00 | United States Dollar |
| Dolar Singapura | 11.844,58 | 11.676,34 | Singapore Dollar |
| Dolar Australia | 10.013,51 | 10.520,77 | Australian Dollar |
| Dolar New Zealand | 9.067,93 | 9.765,55 | New Zealand Dollar |
| Riyal Arab Saudi | 4.284,00 | 4.106,00 | Saudi Riyal |
| Yuan China | 2.198,50 | 2.169,50 | China Yuan |
| Dolar Hong Kong | 2.073,11 | 1.970,72 | Hong Kong Dollar |
| Yen Jepang | 103,03 | 108,87 | Japanese Yen |

**d. Transaksi Pihak Berelasi**

Orang atau entitas dikategorikan sebagai pihak berelasi Grup apabila memenuhi definisi pihak berelasi berdasarkan PSAK No. 224 "Pengungkapan Pihak-pihak Berelasi".

Pihak berelasi adalah orang atau entitas yang terkait dengan entitas yang menyiapkan laporan keuangannya (entitas pelapor). Pihak berelasi adalah sebagai berikut:

i) Orang atau anggota keluarga dekatnya mempunyai relasi dengan entitas pelapor jika orang tersebut:
   a) Memiliki pengendalian atau pengendalian bersama atas entitas pelapor;
   b) Memiliki pengaruh signifikan atas entitas pelapor; atau
   c) Merupakan personil manajemen kunci entitas pelapor atau entitas induk entitas pelapor.

ii) Entitas mempunyai relasi dengan entitas pelapor jika entitas tersebut:
   a) Entitas dan entitas pelapor adalah anggota dari kelompok usaha yang sama (artinya entitas induk, entitas anak, dan entitas anak berikutnya saling berelasi dengan entitas lain);

**d. Transactions with Related Parties**

A person or entity is considered a related party of the Group if it meets the definition of a related party in SFAS No. 224 "Related Party Disclosures".

A related party is a person or entity that is related to the entity that is preparing its financial statements (reporting entity). Related parties are:

i) A person or a close member of that person's family is related to a reporting entity if that person:
   a) Has control or joint control of the reporting entity;
   b) Has control or joint control of the reporting entity; or
   c) Is a member of the key management personnel of the reporting entity or of a parent of the reporting entity.

ii) An entity is related to a reporting entity if any of the following conditions applies:
   a) The entity and the reporting entity are members of the same group (which means that each parent, subsidiary and fellow subsidiary is related to others);

b) Satu entitas adalah entitas asosiasi atau ventura bersama dari entitas lain (atau entitas asosiasi atau ventura bersama yang merupakan anggota suatu kelompok usaha, yang mana entitas lain tersebut adalah anggotanya);

b) One entity is an associate or joint venture of the other entity (or an associate or joint venture of a member of a group of which the other entity is a member);

c) Kedua entitas tersebut adalah ventura bersama dari pihak ketiga yang sama;

c) Both entities are joint ventures of the same third party;

d) Satu entitas adalah ventura bersama dari entitas ketiga dan entitas yang lain adalah entitas asosiasi dari entitas ketiga;

d) One entity is a joint venture of a third entity and the other entity is an associate of the third entity;

e) Entitas tersebut adalah suatu program imbalan pascakerja untuk imbalan kerja dari salah satu entitas pelapor atau entitas yang terkait dengan entitas pelapor. Jika entitas pelapor adalah entitas yang menyelenggarakan program tersebut, maka entitas sponsor juga berelasi dengan entitas pelapor;

e) 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. If the reporting entity is itself such a plan, the sponsoring employers are also related to the reporting entity;

f) Entitas yang dikendalikan atau dikendalikan bersama oleh orang yang diidentifikasi sebagaimana dimaksud dalam angka i);

f) The entity controlled or jointly controlled by a person identified in i);

g) Orang yang diidentifikasi sebagaimana dimaksud dalam angka i) a) memiliki pengaruh signifikan atas entitas atau merupakan personil manajemen kunci entitas (atau entitas induk dari entitas); atau

g) A person identified in i) a) has significant influence over the entity or is a member of the key management personnel of the entity (or a parent of the entity); or

h) Entitas atau anggota dari kelompok yang mana entitas merupakan bagian dari kelompok tersebut, menyediakan jasa personil manajemen kunci kepada entitas pelapor atau kepada entitas induk dari entitas pelapor.

h) Entities or members of the group to which the entity is part of the group, providing services to the entity's key management personnel or to the parent's entity of the reporting entity.

Semua transaksi dan saldo yang signifikan dengan pihak berelasi, baik yang dilakukan dengan syarat normal sebagaimana dilakukan dengan pihak ketiga, maupun tidak, telah diungkapkan pada catatan atas laporan keuangan konsolidasian.

All significant transactions and balances with related parties, whether or not conducted under terms and conditions similar to those granted to third parties, are disclosed in the notes to the consolidated financial statements.

**e. Kas dan Setara Kas**

Kas terdiri dari kas dan bank. Setara kas adalah semua investasi yang bersifat jangka pendek dan sangat likuid yang dapat segera dikonversikan menjadi kas dengan jatuh tempo dalam waktu tiga (3) bulan atau kurang sejak tanggal penempatannya, dan yang tidak dijaminkan serta tidak dibatasi pencairannya.

**f. Instrumen Keuangan**

Grup menerapkan PSAK No. 109, Instrumen Keuangan, mengenai pengaturan instrumen keuangan terkait klasifikasi dan pengukuran, penurunan nilai atas instrumen keuangan dan akuntansi lindung nilai.

***Aset Keuangan***

Grup mengklasifikasikan aset keuangan sesuai dengan PSAK No. 109, Instrumen Keuangan, sehingga setelah pengakuan awal aset keuangan diukur pada biaya perolehan diamortisasi, nilai wajar melalui penghasilan komprehensif lain atau nilai wajar melalui laba rugi, dengan menggunakan dua dasar, yaitu:

(a) Model bisnis Grup dalam mengelola aset keuangan; dan

(b) Karakteristik arus kas kontraktual dari aset keuangan.

Pada tanggal 31 Desember 2024 dan 2023, aset keuangan Grup terdiri dari aset yang diukur pada biaya perolehan diamortisasi, aset keuangan yang diukur pada nilai wajar melalui laba rugi dan aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain.

1. Aset keuangan pada biaya perolehan diamortisasi

   Aset keuangan diukur pada biaya perolehan diamortisasi jika kedua kondisi berikut terpenuhi:

   Aset keuangan dikelola dalam model bisnis yang bertujuan untuk memiliki aset keuangan dalam rangka mendapatkan arus kas kontraktual; dan

   Persyaratan kontraktual dari aset keuangan menghasilkan arus kas pada tanggal tertentu yang semata dari pembayaran pokok dan bunga dari jumlah pokok terutang.

**e. Cash and Cash Equivalents**

Cash consists of cash on hand and in banks. Cash equivalents are short-term, highly liquid investments that are readily convertible to known amounts of cash with original maturities of three (3) months or less from the date of placements, and which are not used as collateral and are not restricted.

**f. Financial Instruments**

The Group has applied SFAS No. 109, which set the requirements in classification and measurement, impairment in value of financial assets and hedging accounting.

***Financial Assets***

The Group classifies its financial assets in accordance with SFAS No. 109, Financial Instruments, that classifies financial assets as subsequently measured at amortized cost, fair value through comprehensive income or fair value through profit or loss, on the basis of both:

(a) The Group's business model for managing the financial assets; and

(b) The contractual cash flow characteristics of the financial assets.

As of December 31, 2024 and 2023, the Group's financial assets consist of financial assets at amortized cost, financial assets at fair value through profit or loss and financial assets at fair value through other comprehensive income.

1. Financial assets at amortized cost

   A financial asset shall be measured at amortized cost if both of the following conditions are met:

   The financial asset is held within a business model whose objective is to hold financial assets in order to collect contractual cash flows; and

   The contractual terms of the financial assets give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

Aset keuangan pada biaya perolehan diamortisasi diukur pada jumlah yang diakui saat pengakuan awal dikurangi pembayaran pokok, ditambah atau dikurangi dengan amortisasi kumulatif menggunakan metode suku bunga efektif yang dihitung dari selisih antara nilai awal dan nilai jatuh temponya, dan dikurangi dengan cadangan kerugian penurunan nilai.

Financial assets at amortized cost is measured at initial amount minus the principal repayments, plus or minus the cumulative amortization using the effective interest method of any difference between that initial amount and the maturity amount, adjusted for allowance for impairment.

Pada tanggal 31 Desember 2024 dan 2023, kategori ini meliputi kas, giro pada Bank Indonesia, giro pada bank lain, penempatan pada Bank Indonesia dan bank lain, efek-efek, efek-efek yang dibeli dengan janji jual kembali, kredit yang diberikan dan piutang, tagihan akseptasi, pendapatan yang masih akan diterima dan aset lain-lain.

As of December 31, 2024 and 2023, this category includes cash, demand deposits with Bank Indonesia, demand deposit with other banks, placements with Bank Indonesia and other banks, securities, securities purchased under agreement to resell, loan and receivables, acceptance receivables, accrued income and other assets.

2. Aset keuangan yang diukur pada nilai wajar melalui laba rugi

2. Financial assets at fair value through profit or loss

Aset keuangan diukur pada nilai wajar melalui laba rugi kecuali aset keuangan tersebut diukur pada biaya perolehan diamortisasi atau pada nilai wajar melalui penghasilan komprehensif lain.

A financial asset shall be measured at fair value through profit or loss unless it is measured at amortized cost or at fair value through comprehensive income.

Derivatif juga diklasifikasikan sebagai diukur pada nilai wajar melalui laba rugi, kecuali derivatif yang ditetapkan sebagai instrumen lindung nilai yang efektif.

Derivatives are also categorized as fair value through profit or loss unless they are designated as effective hedging instruments.

Aset keuangan yang diukur pada nilai wajar melalui laba rugi dicatat pada laporan posisi keuangan pada nilai wajarnya. Perubahan nilai wajar langsung diakui dalam laba rugi. Bunga yang diperoleh dicatat sebagai pendapatan bunga, sedangkan pendapatan dividen dicatat sebagai bagian dari pendapatan lain-lain sesuai dengan persyaratan dalam kontrak, atau pada saat hak untuk memperoleh pembayaran atas dividen tersebut telah ditetapkan.

Financial assets at FVTPL are recorded in the statement of financial position at fair value. Changes in fair value are recognized directly in profit or loss. Interest earned is recorded as interest income, while dividend income is recorded as part of other income according to the terms of the contract, or when the right of payment has been established.

Pada tanggal 31 Desember 2024 dan 2023, efek-efek berupa obligasi Pemerintah, reksadana, dan tagihan derivatif diklasifikasikan dalam kategori ini.

As of December 31, 2024 and 2023, securities in the form of Government bond, mutual funds, and derivative receivables are classified in this category.

3. Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain

Aset keuangan diukur pada nilai wajar melalui penghasilan komprehensif lain jika kedua kondisi berikut terpenuhi:

a. Aset keuangan dikelola dalam model bisnis yang tujuannya akan terpenuhi dengan mendapatkan arus kas kontraktual dan menjual aset keuangan; dan
b. Persyaratan kontraktual dari aset keuangan menghasilkan arus kas pada tanggal tertentu yang semata dari pembayaran pokok dan bunga dari jumlah pokok terutang.

Aset keuangan berupa surat berharga utang yang diukur pada nilai wajar melalui penghasilan komprehensif lain selanjutnya diukur pada nilai wajar dikurangi dengan cadangan kerugian penurunan nilai, dengan keuntungan atau kerugian yang belum direalisasi diakui dalam penghasilan komprehensif lain, sampai aset keuangan tersebut dihentikan pengakuannya atau direklasifikasi, dimana pada saat itu akumulasi keuntungan atau kerugian direklasifikasi ke laba rugi. Keuntungan atau kerugian penurunan nilai dan selisih kurs dan bunga yang dihitung menggunakan metode suku bunga efektif diakui dalam laba rugi.

Aset keuangan berupa instrumen ekuitas yang diukur pada nilai wajar melalui penghasilan komprehensif lain selanjutnya diukur pada nilai wajar, dengan keuntungan atau kerugian yang belum direalisasi diakui dalam penghasilan komprehensif lain. Saat aset keuangan tersebut dihentikan pengakuannya atau direklasifikasi, akumulasi keuntungan atau kerugian direklasifikasi ke saldo laba.

Pada tanggal 31 Desember 2024 dan 2023, kategori ini meliputi investasi efek-efek dalam bentuk obligasi Pemerintah dan korporasi.

3. Financial assets at fair value through other comprehensive income

A financial asset shall be measured at fair value through other comprehensive income if both of the following conditions are met:

a. The financial asset is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets; and
b. The contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

Debt securities financial assets which are initially measured at fair value through comprehensive income are subsequently measured at fair value less allowance for impairment, with unrealized gains or losses recognized in other comprehensive income until the financial assets are derecognized or reclassified, at which time the cumulative gain or loss is reclassified to profit or loss. Gains or losses from impairment and foreign exchange and interest calculated using effective interest method are recognized in profit or loss.

Equity securities financial assets which are initially measured at fair value through comprehensive income are subsequently measured at fair value, with unrealized gains or losses recognized in other comprehensive income. At the time the financial assets are derecognized or reclassified, the cumulative gain or loss is reclassified to retained earnings.

As of December 31, 2024 and 2023, the Group's securities in the form of Government and corporate bonds.

***Liabilitas Keuangan dan Instrumen Ekuitas***

Liabilitas keuangan dan instrumen ekuitas Grup diklasifikasikan berdasarkan substansi perjanjian kontraktual serta definisi liabilitas keuangan dan instrumen ekuitas. Kebijakan akuntansi yang diterapkan atas instrumen keuangan tersebut diungkapkan berikut ini.

***Instrumen Ekuitas***

Instrumen ekuitas adalah setiap kontrak yang memberikan hak residual atas aset suatu entitas setelah dikurangi dengan seluruh liabilitasnya. Instrumen ekuitas dicatat sejumlah hasil yang diterima, setelah dikurangkan dengan biaya penerbitan langsung.

***Liabilitas Keuangan***

Tidak terdapat perubahan signifikan dalam klasifikasi dan pengukuran liabilitas keuangan.

Liabilitas keuangan dalam lingkup PSAK No. 109 diklasifikasikan sebagai berikut: (i) liabilitas keuangan yang diukur dengan biaya diamortisasi, (ii) liabilitas keuangan yang diukur dengan nilai wajar melalui laba rugi. Grup menentukan klasifikasi liabilitas keuangan pada saat pengakuan awal.

Seluruh liabilitas keuangan diakui pada awalnya sebesar nilai wajar dan, dalam hal pinjaman dan utang, termasuk biaya transaksi yang dapat diatribusikan secara langsung dan selanjutnya diukur pada biaya perolehan diamortisasi dengan menggunakan metode suku bunga efektif. Amortisasi suku bunga efektif disajikan sebagai bagian dari beban keuangan dalam laba rugi.

1. Liabilitas keuangan yang diukur pada biaya perolehan diamortisasi

   Liabilitas keuangan pada biaya perolehan diamortisasi diukur pada jumlah yang diakui saat pengakuan awal dikurangi pembayaran pokok, ditambah atau dikurangi dengan amortisasi kumulatif menggunakan metode suku bunga efektif yang dihitung dari selisih antara nilai awal dan nilai jatuh temponya.

***Financial Liabilities and Equity Instruments***

Financial liabilities and equity instruments of the Group are classified according to the substance of the contractual arrangements entered into and the definitions of a financial liability and equity instrument. The accounting policies adopted for specific financial instruments are set out below.

***Equity Instruments***

An equity instrument is any contract that evidences a residual interest in the assets of an entity after deducting all of its liabilities. Equity instruments are recorded at the proceeds received, net of direct issue costs.

***Financial Liabilities***

There are no significant changes in classification and measurement of financial liabilities.

Financial liabilities within the scope of SFAS No. 109 are classified as follows: (i) financial liabilities at amortized cost, (ii) financial liabilities at fair value through profit and loss (FVTPL). The Group determines the classification of its financial liabilities at initial recognition.

All financial liabilities are recognized initially at fair value and, in the case of loans and borrowings, inclusive of directly attributable transaction costs and subsequently measured at amortized cost using the effective interest rate method. The amortization of the effective interest rate is included in finance costs in profit or loss.

1. Financial liabilities at amortized cost

   Financial liabilities at amortized cost is measured at initial amount minus the principal repayments, plus or minus the cumulative amortization using the effective interest method of any difference between that initial amount and the maturity amount.

Pada tanggal 31 Desember 2024 dan 2023, kategori ini meliputi liabilitas segera, simpanan, simpanan dari bank lain, liabilitas akseptasi, efek-efek yang dijual dengan janji beli Kembali, beban yang masih harus dibayar, obligasi subordinasi, serta liabilitas lain-lain dalam bentuk setoran jaminan L/C dan bank garansi yang dimiliki oleh Grup.

As of December 31, 2024 and 2023, the Group's liabilities immediately payable, deposits, deposits from other banks, acceptances payable, securities sold under agreement to repurchased, accrued expenses, subordinated bonds, and other liabilities in the form of security deposit for L/C and bank guarantee are included in this category.

2. Liabilitas keuangan yang diukur pada nilai wajar melalui laba rugi

   Liabilitas keuangan diklasifikasikan dalam kategori ini apabila liabilitas tersebut merupakan hasil dari aktivitas perdagangan atau transaksi derivatif yang tidak dimaksudkan sebagai lindung nilai, atau jika Perusahaan memilih untuk menetapkan liabilitas keuangan tersebut dalam kategori ini.

   Perubahan dalam nilai wajar langsung diakui dalam laba rugi.

   Pada tanggal 31 Desember 2024 dan 2023, kategori ini meliputi liabilitas derivatif.

2. Financial liabilities at fair value through profit or loss

   Financial liabilities are classified in this category if these result from trading activities or derivative transactions that are not accounted for as accounting hedges, or when the Company elects to designate a financial liability under this category.

   Changes in fair value are recognized directly in profit or loss.

   As of December 31, 2024 and 2023, derivative liabilities are included in this category.

***Instrumen Keuangan Derivatif***

Dalam usaha normalnya, Perusahaan melakukan transaksi instrumen keuangan derivatif berupa kontrak tunai dan berjangka mata uang asing. Instrumen keuangan derivatif diukur dan disajikan di laporan posisi keuangan pada nilai wajar dengan menggunakan harga pasar. Derivatif dicatat sebagai aset apabila memiliki nilai wajar positif dan sebagai liabilitas apabila memiliki nilai wajar negatif. Keuntungan atau kerugian yang terjadi dari perubahan nilai wajar diakui dalam laba/rugi.

***Derivative Financial Instruments***

In the normal course of business, the Company enters into transactions involving derivative financial instruments such as foreign currency spot and forward contracts and foreign currency swaps. Derivative financial instruments are measured and presented in the statement of financial position at their fair values. Derivatives are carried as assets when the fair value is positive and as liabilities when the fair value is negative. Gains or losses as a result of fair value changes are recognized in profit or loss.

***Saling Hapus Instrumen Keuangan***

Aset keuangan dan liabilitas keuangan saling hapus dan nilai bersihnya disajikan dalam laporan posisi keuangan jika, dan hanya jika, Perusahaan saat ini memiliki hak yang berkekuatan hukum untuk melakukan saling hapus atas jumlah yang telah diakui tersebut dan berniat untuk menyelesaikan secara neto atau untuk merealisasikan aset dan menyelesaikan liabilitasnya secara simultan.

***Offsetting of Financial Instruments***

Financial assets and liabilities are offset and the net amount reported in the statement of financial position if, and only if, there is a currently enforceable right to offset the recognized amounts and there is intention to settle on a net basis, or to realize the asset and settle the liability simultaneously.

***Reklasifikasi Aset Keuangan***

Sesuai dengan ketentuan PSAK No. 109, Instrumen Keuangan, Perusahaan mereklasifikasi seluruh aset keuangan dalam kategori yang terpengaruh, jika dan hanya jika, Grup mengubah model bisnis untuk pengelolaan aset keuangan tersebut. Sedangkan, liabilitas keuangan tidak direklasifikasi.

***Reclassifications of Financial Assets***

In accordance with SFAS No. 109, Financial Instruments, the Company reclassifies its financial assets when, and only when, the Group changes its business model for managing financial assets. While, any financial liabilities shall not be reclassified.

***Penurunan Nilai Aset Keuangan***

Pada setiap tanggal pelaporan, Grup menilai apakah risiko kredit dari instrumen keuangan telah meningkat secara signifikan sejak pengakuan awal. Ketika melakukan penilaian, Grup mengacu pada perubahan atas risiko gagal bayar yang terjadi sepanjang perkiraan usia instrumen keuangan daripada perubahan atas jumlah kerugian kredit ekspektasian. Dalam melakukan penilaian, Grup membandingkan antara risiko gagal bayar yang terjadi atas instrumen keuangan pada saat periode pelaporan dengan risiko gagal bayar yang terjadi atas instrumen keuangan pada saat pengakuan awal dan mempertimbangkan kewajaran serta ketersediaan informasi, yang tersedia tanpa biaya atau usaha pada saat tanggal pelaporan terkait dengan kejadian masa lalu, kondisi terkini dan perkiraan atas kondisi ekonomi di masa depan, yang mengindikasikan kenaikan risiko kredit sejak pengakuan awal.

***Impairment of Financial Asset***

At each reporting date, the Group assesses whether the credit risk on a financial instrument has increased significantly since initial recognition. When making the assessment, the Group uses the change in the risk of a default occurring over the expected life of the financial instrument instead of the change in the amount of expected credit losses. To make that assessment, the Group compares the risk of a default occurring on the financial instrument as at the reporting date with the risk of a default occurring on the financial instrument as at the date of initial recognition and consider reasonable and supportable information, that is available without undue cost or effort at the reporting date about past events, current conditions and forecasts of future economic conditions, that is indicative of significant increases in credit risk since initial recognition.

Grup menggunakan pendekatan umum dalam mengukur penurunan nilai (Tahap 1, Tahap 2 dan Tahap 3) dengan menentukan apakah terjadi peningkatan risiko kredit yang signifikan atas aset keuangan sejak awal atau fasilitas tersebut gagal bayar pada tanggal pelaporan.

The Group uses the general approach to measure impairment for financial assets (Stage 1, Stage 2 and Stage 3) by determining whether a significant increase in credit risk has occurred on financial asset since initial recognition or whether the facility is defaulted on the reporting date.

**1. Tahap 1 - Kerugian Kredit Ekspektasian (“ECL”) 12 bulan**

Tahap 1 mencakup aset keuangan yang tidak memiliki peningkatan signifikan atas risiko kredit sejak pengakuan awal atau memiliki risiko kredit rendah pada tanggal pelaporan. Untuk aset ini, ECL 12 bulan akan dihitung.

Aset keuangan yang dikategorikan sebagai Tahap 1 adalah aset keuangan dengan hari tunggakan kurang atau sama dengan 30 hari.

**1. Stage 1 - 12-months Expected Credit Losses (ECL)**

Stage 1: includes financial assets that have not had a significant increase in credit risk since initial recognition or that have low credit risk as at the reporting date. For these assets, 12-months ECL is recognized.

Financial assets categorized as Stage 1 are financial assets that are overdue for 30 days or less.

**2. Tahap 2 - Peningkatan risiko kredit yang signifikan**

Tahap 2 mencakup aset keuangan yang mengalami peningkatan signifikan atas risiko kredit, namun tidak memiliki bukti penurunan nilai yang obyektif. Untuk aset ini, *ECL lifetime* dihitung.

Aset keuangan yang dianggap telah mengalami peningkatan risiko kredit yang signifikan dan dikategorikan sebagai Tahap 2 jika aset keuangan memiliki hari tunggakan dari 31-90 hari. Aset keuangan yang telah mengajukan program restrukturisasi, juga dianggap telah mengalami peningkatan risiko kredit yang signifikan sehingga akan dikategorikan sebagai Tahap 2.

**2. Stage 2 - Significant increase in credit risk**

Stage 2: includes financial assets that have had a significant increase in credit risk but do not have objective evidence of impairment. For these assets, lifetime ECL are recognized.

Financial assets are considered to experience significant increase in credit risk and categorized as Stage 2 if the financial assets are 31-90 days past due. Financial asset that has proposed restructuring program, is considered to experience significant increase in credit risk, thus, categorized as Stage 2.

**3. Tahap 3 - Eksposur yang mengalami penurunan nilai kredit atau gagal bayar**

Tahap 3 mencakup aset keuangan yang memiliki bukti obyektif penurunan nilai pada tanggal pelaporan. Tahap ini berisi debitur yang telah *impaired* (gagal bayar).

Aset keuangan yang dikategorikan sebagai Tahap 3 adalah aset keuangan dengan hari tunggakan lebih dari 90 hari.

**3. Stage 3 - Credit impaired (or defaulted) exposures**

Stage 3 includes financial assets that have objective evidence of impairment as at the reporting date. This stage includes debtor's accounts that already are impaired (defaulted).

Financial assets categorized as Stage 3 are financial assets that are more than 90 days past due.

Faktor utama dalam menentukan apakah aset keuangan memerlukan *ECL* 12 bulan (Tahap 1) atau *ECL* lifetime (Tahap 2) disebut dengan kriteria Peningkatan Signifikan dalam Risiko Kredit (*SICR*). Penentuan kriteria peningkatan risiko kredit yang signifikan (*SICR*) memerlukan pengkajian apakah telah terjadi peningkatan risiko kredit yang signifikan pada tanggal pelaporan.

The key factor in determining whether allowance for ECL in a financial asset should be measured using 12-months (Stage 1) or lifetime ECL (Stage 2) is the Significant Increase in Credit Risk (SICR). Determining SICR involves assessment of whether there has been a significant increase in credit risk at reporting date.

PSAK No. 109 mensyaratkan penyertaan informasi tentang kejadian masa lalu, kondisi saat ini, dan perkiraan kondisi ekonomi masa depan. Perkiraan perubahan dalam kerugian kredit 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*).

SFAS No. 109 requires inclusion of information about past events, current conditions, and forecasts of future economic conditions. The estimates of changes in expected credit losses should reflect, and be directionally consistent with, changes in related observable data from period to period. The calculation of ECL requires estimation of forward-looking Probability of Default (PD), Loss Given Default (LGD), and Exposure at Default (EAD).

1. *Probability of Default ("PD")*

   Probabilitas yang timbul di suatu waktu dimana debitur mengalami gagal bayar, dikalibrasikan sampai dengan periode 12 bulan dari tanggal laporan (Tahap 1) atau sepanjang umur (Tahap 2 dan 3) dan digabungkan pada dampak asumsi ekonomi masa depan yang memiliki risiko kredit. *PD* diestimasikan pada suatu titik waktu (*point in time)* dimana hal ini berfluktuasi sejalan dengan siklus ekonomi.

2. *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. Grup mengestimasikan *LGD* berdasarkan data historis dari tingkat pemulihan dan memperhitungkan pemulihan yang berasal dari seluruh aset yang dikelola oleh Grup dengan mempertimbangkan asumsi ekonomi masa depan.

3. *Exposure at Default ("EAD")*

   Perkiraan nilai eksposur laporan posisi keuangan pada saat gagal bayar dengan mempertimbangkan bahwa perubahan ekspektasi yang diharapkan selama masa eksposur. Hal ini menggabungkan dampak penarikan fasilitas yang hampir pasti terjadi (*committed),* pembayaran pokok dan bunga, amortisasi dan pembayaran dipercepat, bersama dengan dampak asumsi ekonomi masa depan.

***Penghentian Pengakuan Aset dan Liabilitas Keuangan***

1. Aset Keuangan

   Aset keuangan (atau bagian dari suatu aset keuangan, atau kelompok aset keuangan serupa) dihentikan pengakuannya jika:

   a. Hak kontraktual atas arus kas yang berasal dari aset keuangan tersebut berakhir;

1. *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 incorporated with the impact of forward-looking economic assumptions that have an effect on credit risk. PD estimated at a point in time that means it will fluctuate in line with the economic cycle.

2. *Loss Given Default ("LGD")*

   The loss that is expected to arise from debtors who defaulted 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 Group expects to receive. The Group estimates LGD based on the historical recovery rates and considers the recovery of all assets managed by the Grup, taking into account forward-looking economic assumptions.

3. *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, amortization and prepayments, with the impact of forward-looking economic assumptions.

***Derecognition of Financial Assets and Liabilities***

1. Financial Assets

   Financial asset (or, where applicable, a part of a financial asset or part of a group of similar financial assets) is derecognized when:

   a. The rights to receive cash flows from the asset have expired;

b. Grup telah mengalihkan haknya untuk menerima arus kas dari aset atau menanggung kewajiban untuk membayar arus kas yang diterima tersebut secara penuh tanpa penundaan yang material kepada pihak ketiga berdasarkan kesepakatan *'pass-through',* dan salah satu dari (a) Grup telah mengalihkan secara substansial seluruh risiko dan manfaat atas aset, atau (b) Grup tidak mengalihkan maupun tidak memiliki secara substansial atas seluruh risiko dan manfaat atas aset, tetapi telah mengalihkan kendali atas aset.

b. The Group has transferred its rights to receive cash flows from the asset or has assumed an obligation to pay the received cash flows in full without material delay to a third party under a 'pass-through' arrangement; an either (a) The Group has transferred substantially all the risks and rewards of the asset, or (b) The Group has neither transferred nor retained substantially the risks and rewards of the asset, but has transferred control of the asset.

2. Liabilitas Keuangan

Liabilitas keuangan dihentikan pengakuannya jika liabilitas keuangan tersebut berakhir, dibatalkan, atau telah kadaluarsa.

2. Financial Liabilities

A financial liability is derecognized when the obligation under the contract is discharged, cancelled or has expired.

**g. Pengukuran Nilai Wajar**

Pengukuran nilai wajar didasarkan pada asumsi bahwa transaksi untuk menjual aset atau mengalihkan liabilitas akan terjadi:

1. di pasar utama untuk aset atau liabilitas tersebut atau;
2. jika tidak terdapat pasar utama, di pasar yang paling menguntungkan untuk aset atau liabilitas tersebut.

Grup harus memiliki akses ke pasar utama atau pasar yang paling menguntungkan pada tanggal pengukuran.

Nilai wajar aset atau liabilitas diukur menggunakan asumsi yang akan digunakan pelaku pasar ketika menentukan harga aset atau liabilitas tersebut, dengan asumsi bahwa pelaku pasar bertindak dalam kepentingan ekonomi terbaiknya.

Pengukuran nilai wajar aset non-keuangan memperhitungkan kemampuan pelaku pasar untuk menghasilkan manfaat ekonomik dengan menggunakan aset dalam penggunaan tertinggi dan terbaiknya, atau dengan menjualnya kepada pelaku pasar lain yang akan menggunakan aset tersebut dalam penggunaan tertinggi dan terbaiknya.

**g. Fair Value Measurement**

The fair value measurement is based on the presumption that the transaction to sell the asset or transfer the liability takes place either:

1. in the principal market for the asset or liability or;
2. in the absence of a principal market, in the most advantageous market for the asset or liability

The Group must have access to the principal or the most advantageous market at the measurement date.

The fair value of an asset or a liability is measured using the assumptions that market participants would use when pricing the asset or liability, assuming that market participants act in their economic best interest.

A fair value measurement of a non-financial asset takes into account a market participant's ability to generate economic benefits by using the asset in its highest and best use or by selling it to another market participant that would use the asset in its highest and best use.

Ketika Grup menggunakan teknik penilaian, maka Perusahaan memaksimalkan penggunaan input yang dapat diobservasi yang relevan dan meminimalkan penggunaan input yang tidak dapat diobservasi.

When the Group uses valuation techniques, it maximizes the use of relevant observable inputs and minimizing the use of unobservable inputs.

Seluruh aset dan liabilitas yang mana nilai wajar aset atau liabilitas tersebut diukur atau diungkapkan, dikategorikan dalam hirarki nilai wajar sebagai berikut:

All assets and liabilities for which fair value is measured or disclosed in the financial statements are categorized within the fair value hierarchy as follows:

- Level 1 - harga kuotasian (tanpa penyesuaian) di pasar aktif untuk aset atau liabilitas yang identik;
- Level 2 - teknik penilaian dimana level input terendah yang signifikan terhadap pengukuran nilai wajar dapat diobservasi, baik secara langsung maupun tidak langsung;
- Level 3 - teknik penilaian dimana level input terendah yang signifikan terhadap pengukuran nilai wajar tidak dapat diobservasi.

- Level 1 - Quoted (unadjusted) market prices in active markets for identical assets or liabilities;
- Level 2 - Valuation techniques for which the lowest level input that is significant to the fair value measurement is directly or indirectly observable;
- Level 3 - Valuation techniques for which the lowest level input that is significant to the fair value measurement is unobservable.

Untuk aset dan liabilitas yang diukur pada nilai wajar secara berulang dalam laporan keuangan, maka Grup menentukan apakah telah terjadi transfer di antara level hirarki dengan menilai kembali pengkategorian level nilai wajar pada setiap akhir periode pelaporan.

For assets and liabilities that are recognized in the financial statements on a recurring basis, the Group determines whether there are transfers between levels in the hierarchy by re-assessing categorization at the end of each reporting period.

**h. Giro Wajib Minimum (GWM)**

Pada tanggal 31 Desember 2024 dan 2023, GWM Grup telah sesuai dengan ketentuan Peraturan Bank Indonesia (“PBI”) mengenai Giro Wajib Minimum Bank Umum pada Bank Indonesia dalam Rupiah dan Mata Uang Asing, dengan perubahan terakhir sesuai dengan Peraturan Anggota Dewan Gubernur No. 12 Tahun 2023 tanggal 1 Oktober 2023 tentang Perubahan Kedua atas Peraturan Anggota Dewan Gubernur No. 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, dimana rasio GWM Rupiah harus dipenuhi sebesar 9% dengan pemenuhan secara harian sebesar 0%, PLM sebesar 5%, serta valuta asing sebesar 4%.

**h. Minimum Liquidity Reserve**

As of December 31, 2024 and 2023, the Group's Statutory Reserves has complied with the provisions of Bank Indonesia Regulations ("PBI") regarding the minimum Statutory Reserves for Commercial Banks at Bank Indonesia in Rupiah and Foreign Currency, with latest amendment in accordance with Regulation of Members of the Board of Governors No. 12 Year 2023 dated October 1, 2023 concerning the second amendment to the Regulation of Members of the Board of Governors No. 24/8/PADG/2022 concerning Minimum Statutory Reserves in Rupiah and Foreign Currency for Conventional Commercial Banks, Islamic Commercial Banks, and Sharia Business Units, where the Rupiah Statutory Reserves must be met is 9% with daily fulfillment of 0%, PLM for 5%, as well as foreign currency of 4%.

**i. Penempatan pada Bank Indonesia dan Bank Lain**

Penempatan pada Bank Indonesia dan bank lain merupakan penanaman dana dalam bentuk *call money, deposit facility*, dan *term deposit.*

Penempatan pada Bank Indonesia dan bank lain diklasifikasikan sebagai aset keuangan yang diukur biaya perolehan diamortisasi. Lihat Catatan 2f untuk kebijakan akuntansi pengukuran instrumen keuangan.

**i. Placements with Bank Indonesia and Other Banks**

Placements with Bank Indonesia and other banks represent investments in call money, deposit facility, and term deposit.

Placements with Bank Indonesia and other banks are classified as financial assets at amortized cost. Refer to Note 2f for the accounting policy on financial instruments.

**j. Efek-efek**

***Efek-efek selain Sukuk***

Efek-efek yang dimiliki terdiri dari Sertifikat Bank Indonesia, obligasi, reksadana, tagihan wesel ekspor, dan efek-efek pasar uang dan pasar modal lainnya.

Obligasi terdiri dari Obligasi Pemerintah dan Obligasi Korporasi yang dibeli dari pasar.

Efek-efek dan Obligasi Pemerintah diklasifikasikan sebagai aset keuangan yang diukur pada nilai wajar melalui laba rugi, pada nilai wajar melalui penghasilan komprehensif lain, dan biaya perolehan diamortisasi. Lihat Catatan 2f untuk kebijakan akuntansi atas pengukuran instrumen keuangan.

***Investasi Sukuk***

Investasi sukuk yang diukur pada biaya perolehan pada awalnya diakui sebesar biaya perolehan, termasuk biaya transaksi. Selisih antara biaya perolehan dan nilai nominal diamortisasi secara garis lurus selama jangka waktu sukuk dan diakui dalam laba rugi. Rugi penurunan nilai diakui dalam laba rugi apabila jumlah terpulihkan lebih kecil daripada jumlah tercatat.

Investasi sukuk yang diukur pada nilai wajar melalui laba rugi pada awalnya diakui sebesar biaya perolehan, tidak termasuk biaya transaksi. Setelah pengakuan awal, selisih antara nilai wajar dan jumlah tercatat diakui dalam laba rugi.

**j. Marketable Securities**

***Securities other than Sukuk***

Marketable securities consist of Bank Indonesia Deposit Certificate, bonds, mutual funds, export bills receivable, and other money market and capital market securities.

Bonds consist of Government Bonds and Corporate Bonds purchased from the market.

Marketable securities and Government Bonds are classified as financial assets at fair value through profit loss, other comprehensive income, and at amortized cost. Refer to Note 2f for the accounting policy on financial instruments.

***Investment in Sukuk***

Investment in sukuk measured at cost are initially recognized at cost, including transaction costs. The difference between the acquisition cost and nominal value is amortized on straight-line basis over the term of sukuk and recognized in profit or loss. An impairment loss is recognized in profit or loss when the recoverable amount is less than the carrying amount.

Investment in sukuk measured at fair value through profit or loss are initially recognized at cost, excluding transaction costs. After initial recognition, the difference between the fair value and the carrying amount is recognized in profit or loss.

Investasi sukuk yang diukur pada nilai wajar melalui penghasilan komprehensif lain pada awalnya diakui sebesar biaya perolehan, termasuk biaya transaksi. Setelah pengakuan awal, selisih antara biaya perolehan dan nilai nominal diamortisasi secara garis lurus selama jangka waktu sukuk dan diakui dalam laba rugi. Keuntungan atau kerugian dari perubahan nilai wajar diakui dalam penghasilan komprehensif lain. Ketika investasi sukuk dihentikan pengakuannya, akumulasi keuntungan atau kerugian yang sebelumnya diakui dalam penghasilan komprehensif lain direklasifikasi ke laba rugi sebagai penyesuaian reklasifikasi. Rugi penurunan nilai diakui dalam laba rugi apabila jumlah terpulihkan lebih kecil daripada jumlah tercatat, setelah memperhitungkan saldo dalam penghasilan komprehensif lain.

Investment in sukuk measured at fair value through other comprehensive income are initially recognized at cost, including transaction costs. After initial recognition, the difference between the acquisition cost and nominal value is amortized on straight-line basis over the term of the sukuk and recognized in profit or loss. Gains or losses from changes in fair value is recognized in other comprehensive income. When the investments in sukuk are derecognized, the cumulative gain or loss previously recognized in other comprehensive income is reclassified to profit or loss as a reclassification adjustment. An impairment loss is recognized in profit or loss when the recoverable amount is less than the carrying amount, after taking into account the balance in other comprehensive income.

**k. Kredit yang Diberikan dan Piutang/ Pembiayaan Syariah**

**k. Loans and Receivables/Sharia Financing**

Kredit yang diberikan adalah penyediaan uang atau tagihan yang dapat disetarakan dengan kas, berdasarkan persetujuan atau kesepakatan pinjam-meminjam dengan debitur yang mewajibkan debitur untuk melunasi utang berikut bunganya setelah jangka waktu tertentu.

Loans represent provision of cash or cash equivalents based on agreements with borrowers, where borrowers required to repay their debts with interest after specified periods.

Kredit yang diberikan diklasifikasikan sebagai aset keuangan yang diukur pada biaya perolehan diamortisasi (Catatan 2f).

Loans are classified as financial assets at amortized cost (Note 2f).

Termasuk dalam kredit yang diberikan adalah pembiayaan syariah yang terdiri dari piutang murabahah, piutang qardh, pembiayaan musyarakah, pembiayaan mudharabah dan piutang ijarah.

Loans include sharia financing which consist of murabahah receivables, qardh receivables, musyarakah financing, mudharabah financing and ijarah receivables.

Murabahah adalah akad jual beli barang dengan harga jual sebesar biaya perolehan ditambah keuntungan (marjin) yang disepakati dan penjual harus mengungkapan biaya perolehan barang tersebut kepada pembeli.

Murabahah is an agreement for the sale and purchase of goods with sales price equivalent to cost plus agreed margin, and the seller should inform the buyer the purchase cost.

Qardh adalah akad pinjam meminjam dana tanpa imbalan dengan liabilitas pihak peminjam mengembalikan pokok pinjaman secara sekaligus atau cicilan dalam jangka waktu tertentu.

Qardh is a loan/borrowing funds without profit wherein the borrower returns the principal of the loan at lump sum or on installment over certain period.

Musyarakah adalah akad kerjasama antara dua pihak atau lebih untuk suatu usaha tertentu, dimana masing-masing pihak memberikan kontribusi dana dengan ketentuan bahwa keuntungan dibagi berdasarkan kesepakatan sedangkan kerugian berdasarkan porsi kontribusi dana. Dana tersebut meliputi kas atau aset nonkas yang diperkenankan oleh syariah.

Musyarakah is an agreement between investors (musyarakah partners) to have a joint-venture in a partnership, at an agreed nisbah sharing portion, while losses will be proportionately distributed based on the capital contribution. These funds including cash or non-cash assets which are allowed by sharia.

Mudharabah adalah akad kerjasama usaha antara bank sebagai pemilik dana (shahibul maal) dan nasabah selaku pengelola dana (mudharib), menjalankan usaha dengan penentuan awal keuntungan dan kerugian (nisbah). Ijarah adalah akad sewa-menyewa antara pemilik (objek sewa) dan penyewa untuk mendapatkan imbalan atas objek sewa yang disewakannya.

Mudharabah is an agreement between the bank as an owner of funds (*shahibul maal)* and customer as a fund manager (*mudharib*) to run a business with pre-defined terms of gain or loss (nisbah). Ijarah is a lease agreement between the lessor (lease object) and lessee to get margin from leased object.

Pembiayaan syariah disajikan sebesar jumlah pembiayaan dikurangi dengan cadangan kerugian penurunan nilai dengan jumlah minimum berdasarkan Peraturan Otoritas Jasa Keuangan (POJK) No. 2/POJK.03/2022 tentang Penilaian Kualitas Aset Bank Umum Syariah dan Unit Usaha Syariah dan POJK No. 11/POJK.03/2020 tanggal 13 Maret 2020 tentang Stimulus Perekonomian Nasional sebagai Kebijakan *Counter Cyclical* Dampak Penyebaran *Corona Virus Diseases* 2019.

Sharia financing is presented in the amount of financing minus the allowance for impairment losses with a minimum amount based on Financial Services Authority Regulation (POJK) No. 2/POJK.03/2022 regarding Asset Quality Ratings for Sharia Bank and Sharia Business Unit and Financial Services Authority Regulation No. 11/POJK.03/2020 dated March 13, 2020 concerning National Economic Stimulus as a Counter Cyclical Policy on the Impact of the Spread of Corona Virus Diseases 2019.

Pembiayaan syariah dengan akad murabahah disajikan sebesar jumlah pembiayaan dikurangi cadangan kerugian penurunan nilai sesuai dengan PSAK No. 402 (Amendemen 2019).

Sharia financing with murabahah contract is presented at the financing amount less allowance for impairment losses in accordance with SFAS No. 402 (Amendment 2019).

Ketika kredit yang diberikan tidak tertagih, kredit tersebut dihapus buku dengan menjurnal balik cadangan kerugian penurunan nilai. Kredit yang diberikan tersebut dapat dihapus buku setelah semua prosedur yang diperlukan telah dilakukan dan jumlah kerugian telah ditentukan.

For uncollected loans, the loans are written off by reversing the journal of allowance for impairment losses. Such loans can be written-off after all the necessary procedures have been performed and the amount of the loss has been determined.

Kriteria debitur yang dapat dihapus bukukan meliputi:

Criteria of the debtor that can be written off include:

1. Fasilitas kredit telah mengalami penurunan nilai;
2. Fasilitas kredit telah dibentuk cadangan kerugian penurunan nilai sebesar 100% dari pokok kredit;

1. The credit facilities have been impaired;
2. The credit facility has been provided with allowance for impairment losses amounting to 100% of the loan principal;

3. Telah dilakukan berbagai upaya penagihan dan pemulihan, namun tidak berhasil;

4. Usaha debitur sudah tidak mempunyai prospek atau kinerja debitur buruk atau tidak ada kemampuan membayar;

5. Hapus buku dilakukan terhadap semua kewajiban kredit, termasuk dari fasilitas pinjaman non tunai sehingga penghapusan tidak dapat dilakukan pada beberapa kewajiban kreditnya (penghapusan sebagian);

Apabila aset yang dijaminkan diambil alih, maka Grup akan menjurnal balik cadangan kerugian penurunan nilai dan mengakui agunan yang diambil alih yang diukur pada nilai yang lebih rendah antara nilai tercatat dan nilai wajar setelah dikurangi biaya untuk menjual.

Restrukturisasi kredit meliputi modifikasi persyaratan kredit, konversi kredit menjadi saham atau instrumen keuangan lainnya dan/atau kombinasi dari keduanya.

Kredit yang direstrukturisasi disajikan sebesar nilai yang lebih rendah antara nilai tercatat kredit pada tanggal restrukturisasi atau nilai tunai penerimaan kas masa depan setelah restrukturisasi. Kerugian akibat selisih antara nilai tercatat kredit pada tanggal restrukturisasi dengan nilai tunai penerimaan kas masa depan setelah restrukturisasi diakui sebagai laba/rugi. Setelah restrukturisasi, semua penerimaan kas masa depan yang ditetapkan dalam persyaratan baru dicatat sebagai pengembalian pokok kredit yang diberikan dan pendapatan bunga sesuai dengan syarat-syarat restrukturisasi.

3. Efforts for billing and recovery have been made, but to no avail;

4. The debtor's business has no prospects or has poor performance or no ability to pay;

5. The write–off are perfomed for all loan obligations, including those from non-cash loan facility so that the write-offs cannot be done on some of its loan obligations (partial write-off);

If the assets pledged as collateral are foreclosed, the Group should reverse allowance for impairment losses and recognize foreclosed properties that are measured at the lower of carrying amount and fair value less costs to sell.

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 are stated at the lower of carrying value of the loan at the time of restructuring or net present value of the 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 a return of principal and interest income, in accordance with the restructuring scheme.

**I. Tagihan dan Liabilitas Akseptasi**

Tagihan akseptasi diklasifikasikan sebagai aset keuangan pada biaya perolehan diamortisasi. Lihat Catatan 2f untuk kebijakan akuntansi atas instrumen keuangan.

Liabilitas akseptasi diklasifikasikan sebagai liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi. Lihat Catatan 2f untuk kebijakan akuntansi atas instrumen keuangan.

**I. Acceptances Receivable and Payable**

Acceptances receivable are classified as financial assets at amortized cost. Refer to Note 2f for the accounting policy on financial instruments.

Acceptances payable are classified as financial liabilities at amortized cost. Refer to Note 2f for the accounting policy on financial instruments.

**m. Efek yang Dibeli dengan Janji Jual Kembali dan Efek yang Dijual dengan Janji Beli Kembali**

***Efek yang Dibeli dengan Janji Jual Kembali (Reverse Repo)***

Efek yang dibeli dengan janji dijual kembali (*reverse repo*) disajikan sebagai tagihan sebesar harga jual kembali yang disepakati dikurangi dengan selisih antara harga beli dan harga jual kembali yang disepakati (pendapatan bunga yang ditangguhkan) dan cadangan kerugian penurunan nilai. Selisih antara harga beli dan harga jual kembali yang disepakati tersebut diamortisasi dengan menggunakan suku bunga efektif sebagai pendapatan bunga selama jangka waktu sejak efek itu dibeli hingga saat dijual kembali.

Efek yang dibeli dengan janji dijual kembali diklasifikasikan sebagai aset keuangan yang diukur pada biaya perolehan diamortisasi. Lihat Catatan 2f untuk kebijakan akuntansi atas instrumen keuangan.

***Efek yang Dijual dengan Janji Beli Kembali (Repo)***

Efek yang dijual dengan janji beli kembali *(repo)* diakui sebagai liabilitas sebesar harga pembelian kembali yang disepakati dengan nasabah dikurangi beban bunga yang belum diamortisasi. Selisih antara harga jual dan harga beli kembali diperlakukan sebagai bunga dibayar dimuka dan diakui sebagai beban bunga sesuai dengan jangka waktu sejak efek dijual hingga dibeli kembali. Efek yang dijual tetap dicatat sebagai aset dalam laporan posisi keuangan karena kepemilikan efek tetap berada pada pihak Grup sebagai penjual.

Efek yang dijual dengan janji dibeli kembali diklasifikasikan sebagai liabilitas keuangan yang diukur pada biaya perolehan diamortisasi. Lihat Catatan 2f untuk kebijakan akuntansi atas instrumen keuangan.

**m. Securities Purchased Under Agreements to Resell and Securities Sold Under Agreements to Repurchase**

***Securities Purchased Under Agreements to Resell (Reverse Repo)***

Securities purchased under resale agreements (reverse repo) are presented as receivables at the agreed resale price net of the difference between the purchase price and agreed resale price (unearned interest income) and allowance for impairment losses. The difference between the purchase price and the agreed resale price are amortized using effective interest rate as interest income over the period, commencing from the acquisition date to the resale date.

Securities purchased under resale agreements are classified in financial assets measured at amortized cost category. Refer to Note 2f for accounting policy for financial instruments.

***Securities Sold Under Agreements to Repurchase (Repo)***

Securities sold under agreements to repurchase (repo) are recognized as liabilities at the repurchase price agreed with the customer less unamortized interest expense. The difference between the selling price and the repurchase price is treated as prepaid interest expense and recognized as interest expense over the period from the sale of securities until it is repurchased. Securities sold are recorded as assets in statements of financial position since the ownership of the securities remains with the Group as the seller.

Securities sold under agreements to repurchase are classified in financial liabilities measured at amortized cost category. Refer to Note 2f for accounting policy for financial instruments.

**n. Kontrak Jaminan Keuangan dan Tagihan Komitmen Lainnya**

Kontrak jaminan keuangan adalah kontrak yang mengharuskan penerbit untuk melakukan pembayaran kepada pemegang kontrak atas kerugian yang terjadi karena debitur tertentu gagal untuk melakukan pembayaran pada saat jatuh tempo, sesuai dengan ketentuan dari instrumen utang. Jaminan keuangan tersebut diberikan kepada bank, lembaga keuangan dan badan-badan lainnya atas nama debitur untuk menjamin kredit, fasilitas-fasilitas perbankan lainnya dan penyediaan dana yang belum ditarik.

Pengakuan awal jaminan keuangan dalam laporan keuangan adalah sebesar nilai wajar pada saat jaminan diberikan. Nilai wajar jaminan keuangan pada saat berlakunya transaksi pada umumnya sama dengan premi yang diterima karena diberikan dengan syarat dan kondisi normal dan nilai wajar awal diamortisasi sepanjang umur jaminan keuangan.

Setelah pengakuan awal kontrak, jaminan keuangan dicatat pada nilai yang lebih tinggi antara biaya perolehan diamortisasi dengan nilai kini pembayaran yang diharapkan akan terjadi (ketika pembayaran atas jaminan menjadi besar kemungkinan terjadinya), dan selisihnya dibebankan sebagai beban operasional lainnya dalam laba rugi.

Cadangan kerugian penurunan nilai atas komitmen berdasarkan dari model kerugian ekspektasian (Catatan 2f).

**n. Financial Guarantee Contracts and Other Commitments**

Financial guarantee contracts are contracts that require the issuer to make specified payments to reimburse the holder for a loss incurred because a specified debtor defaulted to make payments when due, in accordance with the terms of a debt instrument. Such financial guarantees are given to banks, financial institutions and other institutions on behalf of customers to secure loans, other banking facilities and undrawn provision of loans.

Financial guarantees are initially recognized in the financial statements at fair value on the date the guarantee was given. The fair value of a financial guarantee at inception is likely to equal the premium received because all guarantees are agreed on arm's length terms and the initial fair value is amortized over the life of the financial guarantees.

Subsequently, they are measured at the higher of amortized amount and the present value of any expected payment (when a payment under the guarantee has become probable) and the difference is charged to other operating expense in the profit or loss.

Allowance for impairment losses on certain commitment are based on expected losses model (Note 2f).

**o. Aset Tetap**

Aset tetap, kecuali tanah dan bangunan, dinyatakan berdasarkan biaya perolehan, tetapi tidak termasuk biaya perawatan sehari-hari, dikurangi akumulasi penyusutan dan akumulasi rugi penurunan nilai, jika ada.

Tanah dinyatakan berdasarkan nilai revaluasian dikurangi akumulasi rugi penurunan nilai, jika ada.

Bangunan dinyatakan berdasarkan nilai revaluasian dikurangi akumulasi penyusutan dan akumulasi rugi penurunan nilai, jika ada.

**o. Property and Equipment**

Property and equipment, except for land and buildings, are carried at cost, excluding day to day servicing, less accumulated depreciation and impairment, if any.

Land is stated at the revalued amount less accumulated impairment losses, if any.

Buildings are stated at the revalued amount less accumulated depreciation and accumulated impairment losses, if any.

Nilai revaluasian tanah dan bangunan ditentukan oleh penilai independen. Pada saat model revaluasi diterapkan, akumulasi penyusutan bangunan pada tanggal revaluasi dieliminasi terhadap biaya perolehan dan nilai tercatat neto setelah dieliminasi disajikan kembali sebesar jumlah revaluasian. Kenaikan nilai akibat revaluasi dikreditkan ke akun "Surplus revaluasi aset tetap" sebagai "Komponen ekuitas lainnya" di bagian ekuitas pada laporan posisi keuangan dan laporan perubahan ekuitas. Penurunan nilai yang menghapuskan kenaikan nilai sebelumnya atas aset yang sama diakui dalam penghasilan komprehensif lain, sedangkan penurunan nilai lainnya langsung dibebankan ke laba rugi. Surplus revaluasi aset tetap akan dipindahkan dari "Komponen ekuitas lainnya" ke "Saldo laba" pada saat aset dihentikan penggunaannya.

Revaluation amount of land and buildings was determined by an independent appraiser. At the time of the application of revaluation model, accumulated depreciation of buildings on 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 building. Revaluation surplus is credited to the account "Revaluation surplus of property and equipment" which is included in "Other equity components" in the equity section of the statement of financial position and statement of changes in equity. Impairment that will reverse the previously recognize increament of the asset is recognized in other comprehensive income, while other impairment is directly charged to profit or loss. Revaluation surplus of property and equipment will be transferred from "Other equity components" to "Retained earnings" at the time the asset is derecognized.

Biaya perolehan awal aset tetap meliputi harga perolehan, termasuk bea impor dan pajak pembelian yang tidak boleh dikreditkan dan biaya-biaya yang dapat diatribusikan secara langsung untuk membawa aset ke lokasi dan kondisi yang diinginkan sesuai dengan tujuan penggunaan yang ditetapkan.

The initial cost of property and equipment consists of its purchase price, including non-refundable import duties and taxes and any directly attributable costs in bringing the property and equipment to its working condition and location for its intended use.

Revaluasi akan dilakukan dengan keteraturan yang cukup reguler untuk memastikan bahwa jumlah tercatat tidak berbeda secara material dengan jumlah yang ditentukan dengan menggunakan nilai wajar pada akhir periode pelaporan.

Revaluation will be perfomed regularly to ensure that the carrying amount does not differ materially from the amount determined using the fair value at the end of the reporting period.

Beban-beban yang timbul setelah aset tetap digunakan, seperti beban perbaikan dan pemeliharaan, dibebankan ke laba rugi pada saat terjadinya. Apabila beban-beban tersebut menimbulkan peningkatan manfaat ekonomis di masa datang dari penggunaan aset tetap tersebut yang dapat melebihi kinerja normalnya, maka beban-beban tersebut dikapitalisasi sebagai tambahan biaya perolehan aset tetap.

Expenditures incurred after the property and equipment have been put into operations, such as repairs and maintenance costs, are normally charged to profit or loss in the year such costs are incurred. If these expenditures have resulted in an increase in the future economic benefits expected to be obtained from the use of the property and equipment beyond its originally assessed standard of performance, the expenditures are capitalized as additional costs of property and equipment.

Penyusutan dihitung berdasarkan metode garis lurus (*straight-line method*) selama masa manfaat aset tetap sebagai berikut:

Depreciation is computed on a straight-line basis over the property and equipment's useful lives, as follows:

| | Tahun/*Years* | % | |
|---|---|---|---|
| Bangunan | 20 | 5 | Buildings |
| Inventaris kantor | 10 | 10 | Office equipment |
| Kendaraan bermotor | 4 | 25 | Vehicles |

Nilai tercatat aset tetap ditelaah kembali dan dilakukan penurunan nilai apabila terdapat peristiwa atau perubahan kondisi tertentu yang mengindikasikan nilai tercatat tersebut tidak dapat dipulihkan sepenuhnya.

The carrying values of property and equipment are reviewed for impairment when events or changes in circumstances indicate that the carrying values may not be recoverable.

Jumlah tercatat aset tetap dihentikan pengakuannya pada saat dilepaskan atau tidak ada manfaat ekonomis masa depan yang diharapkan dari penggunaan atau pelepasannya. Keuntungan atau kerugian yang timbul dari penghentian pengakuan aset tetap diakui dalam laba rugi pada tahun terjadinya penghentian pengakuan.

The carrying amount of property and equipment is derecognized upon disposal or when no future economic benefits are expected from its use or disposal. Any gains or losses arising from derecognition of property and equipment is included in profit or loss in the year the item is derecognized.

Nilai residu, umur manfaat, serta metode penyusutan ditelaah setiap akhir tahun dan dilakukan penyesuaian apabila hasil telaah berbeda dengan estimasi sebelumnya.

The asset's residual values, useful life and depreciation method are reviewed and adjusted, if appropriate, at each financial year end.

**p. Aset Ijarah**

**p. Ijarah Assets**

Aset ijarah, yakni kendaraan bermotor, mesin, alat berat dan piranti lunak, disusutkan atau diamortisasi sesuai dengan jangka waktu sewa atau umur ekonomis aset, mana yang lebih pendek, dimana pada akhir masa akad, aset tersebut akan dihibahkan ke penyewa.

Ijarah assets, such as motorcycle, machinery, heavy equipment and software, are depreciated or amortized over the lease term or the economic life of assets, whichever is shorter, where at the end of the contract period, these assets are given to lessee.

Untuk akad ijarah *muntahiyah bittamlik* (sewa pembiayaan), apabila pada saat perpindahan kepemilikan aset ijarah dari pemilik kepada penyewa dilakukan dengan cara hibah, maka jumlah tercatat aset ijarah diakui sebagai beban.

For the ijarah muntahiyah bittamlik contracts (lease financing), if at the time of transfer of ownership of the asset from the owner to the lessee by grant, then the carrying amount is recognized as an ijarah asset expense.

Pendapatan sewa selama masa akad diakui pada saat manfaat atas aset telah diserahkan kepada penyewa.

Lease income during lease term is recognized when the benefits of assets have been handed over to the lessee.

Pendapatan ijarah disajikan secara neto setelah dikurangi beban yang terkait yakni beban penyusutan, pemeliharaan, dan perbaikan. Pendapatan ijarah neto disajikan sebagai bagian dari "pendapatan bagi hasil" dalam laba rugi.

Ijarah income is presented net of related expenses such as, depreciation, maintenance and repairs expenses. Ijarah net income is presented as part of " profit sharing income" in profit or loss.

**q. Agunan yang Diambil Alih**

**q. Foreclosed Properties**

Agunan kredit yang diberikan, berupa tanah dan aset lainnya, yang telah diambil alih oleh Grup disajikan dalam perkiraan "Aset lain-lain".

Collaterals on loans in the form of land and other assets foreclosed by the Group, are presented under "Other Assets" account.

Agunan yang diambil alih dicatat pada nilai yang lebih rendah antara nilai tercatat dan nilai wajar setelah dikurangi biaya untuk menjual. Selisih antara nilai agunan yang diambil alih dengan sisa pokok pinjaman yang diberikan, jika ada, dibebankan ke laba rugi tahun berjalan.

Selisih antara nilai agunan yang telah diambil alih dan hasil penjualannya diakui sebagai keuntungan atau kerugian pada saat penjualan agunan.

Biaya-biaya yang berkaitan dengan pemeliharaan dan perbaikan agunan yang diambil alih dibebankan ke laba rugi pada saat terjadinya.

Bila terjadi penurunan nilai yang bersifat permanen, maka nilai tercatatnya dikurangi untuk mengakui penurunan tersebut dan kerugiannya dibebankan pada laba rugi tahun berjalan.

Manajemen melakukan evaluasi secara berkala atas nilai agunan yang diambil alih. Bila terjadi penurunan nilai yang bersifat permanen, maka nilai tercatatnya dikurangi untuk mengakui penurunan tersebut dan kerugiannya dibebankan pada laba rugi.

Foreclosed properties are stated at the lower of carrying amount and fair value less costs to sell. The difference between the value of the foreclosed properties and the outstanding loan principal, if any, is charged to the current year profit or loss.

The difference between the carrying value of the foreclosed property and the proceeds from its sale is recognized as a gain or loss in the period the property was sold.

The costs of maintenance and renovation of foreclosed properties are charged to profit or loss when incurred.

If the decline in value is judge to be permanent, the carrying amount of the property is written-down to recognize loss, and such loss is charged to the current year profit or loss.

Management evaluates periodically the value of foreclosed assets. If there are permanent impairment, the carrying amount is reduced to recognize the decline and losses charged to the profit or loss for the year.

**r. Transaksi Sewa**

***Sebagai Pesewa***

*Sewa Operasi*

Sewa dimana Grup tetap mempertahankan secara substansial seluruh risiko dan manfaat yang terkait dengan kepemilikan suatu aset diklasifikasikan sebagai sewa operasi. Biaya langsung awal yang dapat diatribusikan secara langsung dengan negosiasi dan pengaturan sewa operasi ditambahkan ke nilai tercatat aset sewaan dan diakui ke laba rugi tahun berjalan selama masa sewa sesuai dengan dasar pengakuan pendapatan sewa.

***Sebagai Penyewa***

Grup menerapkan PSAK No. 116 yang mensyaratkan pengakuan liabilitas sewa sehubungan dengan sewa yang sebelumnya diklasifikasikan sebagai 'sewa operasi'.

**r. Lease Transactions**

***As Lessor***

*Operating Lease*

Leases where the Group retains substantially all the risks and benefits of ownership of the asset are classified as operating leases. Initial direct costs incurred in negotiating an operating lease are added to the carrying amount of the leased asset and recognized over the lease term on the same basis as rental income.

***As Lessee***

The Group has applied SFAS No. 116, which set the requirement for the recognition of lease liabilities in relation to leases which had been previously classified as operating lease'.

Pada tanggal permulaan kontrak, Grup 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.

At the inception of a contract, the Group assesses whether the contract is, or contains, a lease. A contract is or contains a lease if the contract conveys the right to control the use of an identified assets for a period of time in exchange for consideration.

Untuk menilai apakah kontrak memberikan hak untuk mengendalikan penggunaan aset identifikasian, Grup harus menilai apakah:

To assess whether a contract conveys the right to control the use of an identified asset, the Group shall assess whether:

- Grup memiliki hak untuk mendapatkan secara substansial seluruh manfaat ekonomi dari penggunaan aset identifikasian; dan

- The Group has the right to obtain substantially all the economic benefits from the use of the asset throughout the period of use; and

- Grup memiliki hak untuk mengarahkan penggunaan aset identifikasian. Grup memiliki hak ini ketika Grup memiliki hak untuk pengambilan keputusan yang relevan tentang bagaimana dan untuk tujuan apa aset digunakan telah ditentukan sebelumnya dan:

  1. Grup memiliki hak untuk mengoperasikan aset;

  2. Grup telah mendesain aset dengan cara menetapkan sebelumnya bagaimana dan untuk tujuan apa aset akan digunakan selama periode penggunaan.

- The Group has the right to direct the use of the asset. The Group has this right when it has the decision-making rights that are the most relevant to changing how and for what purpose the asset is used are predetermined:

  1. The Group has the right to operate the asset;

  2. The Group has designed the asset in a way that predetermined how and for what purpose it will be used.

Pada tanggal awal dimulainya kontrak atau pada tanggal penilaian kembali atas kontrak yang mengandung sebuah komponen sewa, Grup mengalokasikan imbalan dalam kontrak ke masing-masing komponen sewa berdasarkan harga tersendiri relatif dari komponen sewa dan harga tersendiri agregat dari komponen nonsewa.

At the inception or on reassessment of a contract that contains a lease component, the Group allocates the consideration in the contract to each lease component on the basis of their relative stand-alone prices and the aggregate stand-alone price of the non-lease components.

Pada tanggal permulaan sewa, Grup mengakui aset hak-guna dan liabilitas sewa kecuali untuk sewa jangka pendek dan sewa yang aset pendasarnya bernilai rendah. 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.

The Group recognizes a right-of-use asset and a lease liability at the lease commencement date except for short-term lessees and lessees for low-value assets. The right-of-use assets are initially measured at cost, which comprises the initial amount of the lease liability adjusted for any lease payment made at or before the commencement date.

Aset hak-guna kemudian disusutkan menggunakan metode garis lurus dari tanggal permulaan hingga tanggal yang lebih awal antara akhir umur manfaat aset hak-guna atau akhir masa 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, Grup menggunakan suku bunga pinjaman inkremental sebagai tingkat bunga diskonto.

Pembayaran sewa yang termasuk dalam pengukuran liabilitas sewa meliputi pembayaran berikut ini:

- pembayaran tetap, termasuk pembayaran tetap secara substansi;
- pembayaran sewa variabel yang bergantung pada indeks atau suku bunga yang pada awalnya diukur dengan menggunakan indeks atau suku bunga pada tanggal permulaan;
- jumlah yang diperkirakan akan dibayarkan oleh penyewa dengan jaminan nilai residual;
- harga eksekusi opsi beli jika Grup cukup pasti untuk mengeksekusi opsi tersebut; dan
- penalti karena penghentian awal sewa kecuali jika Grup cukup pasti untuk tidak menghentikan lebih awal.

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.

Jika sewa mengalihkan kepemilikan aset pendasar kepada Grup pada akhir masa sewa atau jika biaya perolehan aset hak-guna merefleksikan Grup akan mengeksekusi opsi beli, maka Grup menyusutkan aset hak-guna dari tanggal permulaan hingga akhir umur manfaat aset pendasar. Jika tidak, maka Grup menyusutkan asset hak-guna dari tanggal permulaan hingga tanggal yang lebih awal antara akhir umur manfaat aset hak-guna atau akhir masa sewa.

The right-of-use assets are subsequently depreciated using the straight-line method from the commencement date to the earlier of the end of the useful life of the right-of-use assets or the end of 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 the rate cannot be readily determined, using incremental borrowing rate. Generally, the Group uses its incremental borrowing rate as the discount rate.

Lease payments included in the measurement of the lease liability comprise the following:

- fixed payments, including in-substance fixed payments;
- variable lease payments that depend on an index or a rate, initially measured using the index or rate as at the commencement date;
- amounts expected to be payable under a residual value guarantee;
- the exercise price under a purchase option that the Group is reasonably certain to exercise; and
- penalties for early termination of a lease unless the Group is reasonably certain not to terminate early.

Each lease payment is allocated between the liability and finance cost. The finance cost is charged to profit or loss over the lease period so as to produce a constant periodic rate of interest on the remaining balance of the liability for each period.

If the lease transfers ownership of the underlying asset to the Group by the end of the lease term or if the cost of the right-of-use assets reflects that the Group will exercise a purchase option, the Group depreciates the right-of-use assets from the commencement date to the end of the useful life of the underlying asset. Otherwise, the Group depreciates the right-of-use assets from the commencement date to the earlier of the end of the useful life of the right-of-use assets or the end of the lease term.

**s. Biaya Dibayar Dimuka**

Biaya dibayar dimuka diamortisasi selama masa manfaat masing-masing biaya dengan menggunakan metode garis lurus.

**t. Penurunan Nilai Aset Non-Keuangan**

Pada setiap akhir periode pelaporan tahunan, Grup menelaah apakah terdapat indikasi suatu aset mengalami penurunan nilai. Jika terdapat indikasi tersebut atau pada saat uji periode penurunan nilai aset perlu dilakukan, maka Grup membuat estimasi jumlah terpulihkan aset tersebut.

Jika nilai tercatat aset lebih besar daripada nilai terpulihkannya, maka aset tersebut dinyatakan mengalami penurunan nilai dan rugi penurunan nilai diakui dalam laba rugi. Dalam menghitung nilai pakai, estimasi arus kas masa depan bersih didiskontokan ke nilai kini dengan menggunakan tingkat diskonto sebelum pajak yang mencerminkan penilaian pasar kini dari nilai waktu uang dan risiko spesifik atas aset.

Penelaahan dilakukan pada akhir setiap tanggal pelaporan tahunan untuk mengetahui apakah terdapat indikasi bahwa rugi penurunan nilai aset yang telah diakui dalam periode sebelumnya mungkin tidak ada lagi atau mungkin telah menurun. Jika indikasi dimaksud ditemukan, maka Perusahaan mengestimasi jumlah terpulihkan aset tersebut. Kerugian penurunan nilai yang telah diakui dalam periode sebelumnya akan dipulihkan hanya jika terdapat perubahan asumsi-asumsi yang digunakan untuk menentukan jumlah terpulihkan aset tersebut sejak rugi penurunan nilai diakui. Dalam hal ini, jumlah tercatat aset dinaikkan ke jumlah terpulihkannya. Pembalikan aset tersebut dibatasi sehingga jumlah tercatat aset tidak melebihi jumlah terpulihkannya maupun nilai tercatat, neto setelah penyusutan, seandainya tidak ada rugi penurunan nilai yang telah diakui untuk aset tersebut pada tahun-tahun sebelumnya. Setelah pemulihan tersebut, penyusutan aset tersebut disesuaikan di periode mendatang untuk mengalokasikan nilai tercatat aset yang direvisi, dikurangi nilai sisanya, dengan dasar yang sistematis selama sisa umur manfaatnya.

**s. Prepaid Expenses**

Prepaid expenses are amortized over their beneficial periods using the straight-line method.

**t. Impairment of Non-Financial Assets**

The Group assesses at each reporting period whether there is an indication that an asset may be impaired. If any such indication exists, or when impairment testing for an asset is required, the Group makes an estimate of the asset's recoverable amount.

Where the carrying amount of an asset exceeds its recoverable amount, the asset is considered impaired and impairment losses are recognized in profit or loss. In assessing the value in use, the estimated net future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset.

An assessment is made at each annual reporting date as to whether there is any indication that previously recognized impairment losses recognized for an asset may no longer exist or may have decreased. If such indication exists, the recoverable amount is estimated. A previously recognized impairment loss for an asset is reversed only if there has been a change in the assumptions used to determine the assets recover both amount since the last impairment loss was recognized. If that is the case, the carrying amount of the assets is increase to its recoverable amount. The reversal is limited so that the carrying amount of the assets does not exceed its recoverable amount nor exceed the carrying amount that would have been determined, net of depreciation, had no impairment loss been recognized for the asset in prior periods. After such a reversal, the depreciation charge on the said asset is adjusted in future years to allocate the asset's revised carrying amount, less any residual value, on a systematic basis over its remaining useful life.

**u. Liabilitas Segera**

Liabilitas segera adalah liabilitas Grup kepada pihak lain yang sifatnya wajib segera dibayarkan sesuai perjanjian yang ditetapkan sebelumnya.

Liabilitas segera disajikan sebesar biaya perolehan yang diamortisasi (Catatan 2f).

**u. Liability Immediately Payable**

Obligation due immediately represents the Group's liabilities to other parties that immediately payable in accordance with terms of the relevant agreements.

Obligations due immediately are stated at the amortized cost (Note 2f).

**v. Simpanan dan Simpanan dari Bank Lain**

Simpanan dan simpanan dari bank lain diklasifikasikan sebagai liabilitas keuangan yang diukur pada biaya perolehan diamortisasi menggunakan metode suku bunga efektif (Catatan 2f).

Simpanan merupakan liabilitas kepada nasabah dalam bentuk giro, tabungan dan deposito berjangka.

Giro merupakan simpanan nasabah yang dapat digunakan sebagai alat pembayaran, yang penarikannya dapat dilakukan setiap saat melalui cek atau dengan cara pemindahbukuan dengan bilyet giro atau sarana perintah pembayaran lainnya.

Tabungan merupakan simpanan nasabah yang penarikannya hanya dapat dilakukan sesuai dengan syarat tertentu yang disepakati pada saat pembukaan rekening tabungan. Penarikan atas tabungan tidak dapat dilakukan dengan menggunakan cek atau instrumen sejenis, tetapi menggunakan formulir penarikan tersendiri yang hanya berlaku di bank yang bersangkutan dan/atau menggunakan kartu Anjungan Tunai Mandiri (ATM).

Deposito berjangka merupakan simpanan nasabah yang penarikannya hanya dapat dilakukan pada saat jatuh tempo sesuai dengan jangka waktu yang disepakati dengan nasabah pada saat penempatannya, dimana nasabah akan dikenakan penalti apabila melakukan penarikan sebelum tanggal jatuh temponya.

Simpanan termasuk simpanan syariah dan investasi tidak terikat yang terdiri dari giro dan tabungan Wadiah yang merupakan titipan dana dalam bentuk giro dan tabungan dimana pemilik dana mendapatkan pendapatan bonus.

**v. Deposits and Deposits from Other Banks**

Deposits and deposits from other banks are classified as financial liabilities measured at amortized cost using the effective interest method (Note 2f).

Deposits are liabilities to customers in the form of demand deposits, savings deposits and time deposits.

Demand deposits represent deposits of customers which may be used as instruments of payment, and which may be withdrawn at any time by checks, or other orders of payment or transfers.

Savings deposits represent deposits of customers which may only be withdrawn when certain agreed conditions at the account opening are met. They may not be withdrawn by checks or other equivalent instruments, except by using specific withdrawal slip which can only be validated at the depository bank and/or by using Automatic Teller Machine (ATM) card.

Time deposits represent deposits of customers which may only be withdrawn after a certain period of time in accordance with the agreement with the customers at the time of placement, or the customers will be fined or penalized if withdrawals are made before maturity.

Deposits include sharia deposits and unrestricted investments consisting of Wadiah giro and saving is entrusted funds in the form of savings where income fund owners get a bonus.

Simpanan dari bank lain merupakan liabilitas kepada bank lain dalam bentuk giro, *call money* kurang dari atau 90 hari, dan deposito berjangka dengan periode jatuh tempo menurut perjanjian masing-masing.

Deposits from other banks are liabilities to other banks in the form of demand deposits, call money less than or 90 days and time deposits with original maturities of each agreement.

**w. Obligasi Subordinasi**

Obligasi subordinasi ('obligasi') diklasifikasikan sebagai liabilitas keuangan lainnya yang diukur dengan biaya perolehan diamortisasi (Catatan 2f). Biaya transaksi yang timbul sehubungan dengan penerbitan obligasi dikurangkan dari hasil penerbitan obligasi bersangkutan. Selisih antara hasil emisi bersih dengan nilai nominal obligasi diakui sebagai diskonto yang diamortisasi selama umur obligasi.

**w. Subordinated Bond**

Subordinated bond (bond) is classified as financial liability measured at amortized cost (Note 2f). Transaction cost in relation with the issuance of bond is deducted from the related bond issued. Any difference between bond issuance costs and nominal of bond is recognized as discount and will be amortized based on bond's period.

**x. Dana Syirkah Temporer**

Dana syirkah temporer terdiri dari giro dan tabungan Mudharabah, deposito berjangka Mudharabah dan Sertifikat Investasi Mudharabah antar Bank.

Giro dan tabungan Mudharabah dinyatakan sebesar nilai investasi pemegang tabungan di Grup.

Deposito berjangka Mudharabah dinyatakan sebesar nilai nominal sesuai dengan perjanjian antara pemegang deposito berjangka dengan Grup.

Dana syirkah temporer tidak dapat digolongkan sebagai liabilitas. Hal ini karena Grup tidak berkewajiban untuk mengembalikan jumlah dana awal dari pemilik dana, kecuali kerugian yang timbul akibat kelalaian atau wanprestasi dari manajemen Grup. Di sisi lain, dana syirkah temporer tidak dapat digolongkan sebagai ekuitas karena mempunyai waktu jatuh tempo dan pemilik dana tidak mempunyai hak kepemilikan yang sama dengan pemegang saham seperti hak voting dan hak atas realisasi keuntungan yang berasal dari aset lancar dan aset non-investasi (*current and other non-investment accounts*).

Pemilik dana syirkah temporer memperoleh bagian atas keuntungan sesuai kesepakatan dan menerima kerugian berdasarkan jumlah dana dari masing-masing pihak. Pembagian hasil dana syirkah temporer berdasarkan konsep bagi hasil.

**x. Temporary Syirkah Funds**

Temporary syirkah funds consist of Mudharabah demand and savings deposits, Mudharabah time deposits and Mudharabah Interbank Investment Certificates.

Mudharabah demand and savings deposits are stated at the amount deposited by the depositors in the Group.

Mudharabah time deposits are stated at the nominal amount set forth in the agreements between the holders of time deposit and the Group.

Temporary syirkah fund cannot be classified as liability. This was due to the Group does not have any liability to return the initial fund to the owners, except for losses incurred due to the Group's management negligence or default of loss is incurred. On the other hand, temporary syirkah fund cannot be classified as shareholder's equity, because it has maturity period and the depositors do not have the same rights as the shareholder's such as voting rights and the rights of realised profit from current assets and other non-investment accounts.

The owners of temporary syirkah funds earn profit in accordance with the agreement and receive loss based on the amount of funds from each party. The return of temporary syirkah funds is based on revenue sharing concept.

**y. Biaya Emisi Saham**

Biaya emisi saham dikurangkan dari bagian tambahan modal disetor yang timbul dari penerbitan saham dan tidak diamortisasi.

**z. Pengakuan Pendapatan Bunga, Beban Bunga, Pendapatan dan Beban Bagi Hasil Syariah**

Pendapatan dan Beban Bunga

Pendapatan dan beban bunga untuk semua instrumen keuangan diakui di dalam laba rugi secara akrual dengan menggunakan metode suku bunga efektif.

Pendapatan dan Beban Syariah

Pendapatan syariah terdiri dari keuntungan *murabahah*, pendapatan ijarah *muntahiyah bittamlik* (sewa), dan bagi hasil pembiayaan *mudharabah* dan *musyarakah*.

Keuntungan *murabahah* dan pendapatan *ijarah muntahiyah bittamlik* diakui selama periode akad berdasarkan konsep akrual. Pendapatan bagi hasil pembiayaan *mudharabah* diakui pada saat diterima atau dalam periode terjadinya hak bagi hasil sesuai porsi bagi hasil (nisbah) yang disepakati.

Beban berdasarkan prinsip syariah terdiri dari beban bagi hasil *mudharabah*, beban bonus *wadiah* dan beban bagi hasil Sertifikat Investasi *Mudharabah* Antar Bank Syariah.

**aa. Pengakuan Pendapatan dan Beban Provisi dan Komisi**

Provisi dan Komisi Terkait Instrumen Keuangan

Pendapatan dan beban provisi dan komisi yang terkait dengan perolehan instrumen keuangan yang terkait jangka waktu tertentu yang jumlahnya signifikan, dicatat sebagai bagian dari nilai wajar aset atau liabilitas keuangan dan diamortisasi sesuai dengan jangka waktunya dengan menggunakan suku bunga efektif.

**y. Share Issuance Costs**

Share issuance costs are deducted from the additional paid-in capital resulting from the issuance of shares and are not amortized.

**z. Recognition of Interest Revenues, Interest Expense, Sharia Revenues and Expenses Sharing Distribution**

Interest Revenues and Expenses

Interest income and expense for all financial instruments are recognized in profit or loss on accrual basis using the effective interest rate method.

Sharia Income and Expenses

Sharia revenue consists of income from murabahah, income from muntahiyah bittamlik ijarah (lease), and profit sharing of mudharabah and musyarakah financing.

Income from murabahah and revenue from ijarah muntahiyah bittamlik are recognized over the contract period on an accrual basis. Revenues from the profit sharing of mudharabah financing are recognized when received or within the period of entitlement based on profit sharing agreement.

Expenses based on sharia consists of profit-sharing expense of mudharabah, wadiah bonus expense and profit-sharing expense of Certificate of Sharia Interbank Mudharabah Investment.

**aa. Recognition of Revenues and Expenses on Commissions and Fees**

Fees and Commissions Related to Financial Instruments

Commission income and expense and fees associated with the acquisition of financial instruments with maturity term and that the amount is significant, are recorded as part of the fair value of financial assets or financial liabilities and amortized over the time period using the effective interest rate.

Provisi dan Komisi Lainnya

Provisi dan komisi lainnya yang tidak terkait dengan kegiatan perolehan instrumen keuangan dan jangka waktu tertentu yang jumlahnya signifikan, dan diamortisasi menggunakan metode garis lurus sesuai dengan jangka waktu transaksi yang bersangkutan. Sedangkan, pendapatan dan beban provisi dan komisi lainnya yang tidak signifikan langsung diakui sebagai pendapatan atau beban pada saat terjadinya transaksi.

Pendapatan provisi dan komisi lainnya, meliputi pendapatan yang tidak terkait dengan kredit, seperti jasa *bancassurance*, pendapatan terkait dengan ekspor impor dan bank garansi, dan pendapatan yang diakui pada saat jasa diberikan.

**bb. Pendapatan dan Beban Operasional Lainnya**

Pendapatan operasional lainnya diakui pada saat terjadinya.

Beban operasional lainnya diakui pada saat terjadinya dengan menggunakan metode akrual.

**cc. Pajak Penghasilan**

***Pajak Kini***

Pajak kini ditentukan berdasarkan laba kena pajak dalam tahun yang bersangkutan yang dihitung berdasarkan tarif pajak yang berlaku.

***Pajak Tangguhan***

Pajak tangguhan diakui dengan menggunakan metode liabilitas untuk perbedaan temporer kena pajak yang timbul dari perbedaan antara dasar pengenaan pajak aset dan liabilitas dengan jumlah tercatatnya pada tanggal pelaporan.

Aset pajak tangguhan diakui untuk seluruh perbedaan temporer yang dapat dikurangkan dan rugi fiskal yang dapat dikompensasikan. Aset pajak tangguhan diakui dan direview pada setiap tanggal pelaporan atau diturunkan jumlah tercatatnya, sepanjang kemungkinan besar laba kena pajak tersedia untuk pemanfaatan perbedaan temporer yang dapat dikurangkan dan rugi fiskal yang dapat dikompensasikan.

Other Fees and Commission

Other Fees and commissions that are not related to the acquisition or issuance of financial instrument and have maturity terms in which amounts are significant, are deferred and amortized using the straight-line method over the term of the relevant transaction. Meanwhile, provision fees income and expenses and commissions that are not significant are recognized immediately as income or expenses on the transaction date.

Revenues from commission and other fees not related to credit, such as bancassurance services, and revenues associated with import and export bank guarantee, are recognized as revenue when the services are rendered.

**bb. Other Operating Revenue and Expenses**

Other operating revenues are recognized when earned.

Other operating expenses are recognized when incurred using the accrual method.

**cc. Income Tax**

***Current Tax***

Current tax expense is determined based on the taxable income for the year computed using prevailing tax rates.

***Deferred Tax***

Deferred tax is provided using the liability method on temporary differences between the tax bases of assets and liabilities and their carrying amounts for financial reporting purposes at the reporting date.

Deferred tax assets are recognized for all deductible temporary differences and the carry forward tax benefit of any unused tax losses. Deferred tax assets are recognized and reviewed at each reporting date and reduced to the extent that it is probable that taxable profit will be available against which the deductible temporary differences and the carry forward benefit of unused tax losses can be utilized.

Aset dan liabilitas pajak tangguhan diukur dengan menggunakan tarif pajak yang diharapkan berlaku ketika aset dipulihkan atau liabilitas diselesaikan, berdasarkan tarif pajak (atau peraturan pajak) yang telah berlaku atau secara substantif telah berlaku pada tanggal pelaporan.

Deferred tax assets and liabilities are measured at the tax rates that are expected to apply in the year when the asset is realized or the liability is settled, based on tax rates (or tax laws) that have been enacted or substantively enacted at the reporting date.

Aset pajak tangguhan dan liabilitas pajak tangguhan saling hapus jika dan hanya jika, terdapat hak yang dipaksakan secara hukum untuk melakukan saling hapus aset pajak kini terhadap liabilitas pajak kini dan pajak tangguhan tersebut terkait dengan entitas kena pajak yang sama dan dikenakan oleh otoritas perpajakan yang sama.

Deferred tax assets and deferred tax liabilities are offset if and only if, a legally enforceable right exists to set off current tax assets against current tax liabilities and the deferred taxes relate to the same taxable entity and the same taxation authority.

**dd. Laba per Saham**

**dd. Earnings per Share**

Laba per saham dasar dihitung berdasarkan laba bersih dibagi jumlah rata-rata tertimbang saham yang beredar pada tahun yang bersangkutan.

Basic earning per share is computed by dividing net profit with the weighted average number of outstanding common shares during the year.

**ee. Imbalan Kerja**

**ee. Employee Benefits**

***Liabilitas imbalan kerja jangka pendek***

***Short-term employee benefits liability***

Imbalan kerja jangka pendek diakui sebesar jumlah yang tak-terdiskonto sebagai liabilitas pada laporan posisi keuangan setelah dikurangi dengan jumlah yang telah dibayar dan sebagai beban dalam laba rugi.

Short-term employee benefits are recognized at its undiscounted amount as a liability after deducting any amount already paid in the statement of financial position and as an expense in profit or loss.

***Liabilitas imbalan kerja jangka panjang***

***Long-term employee benefits liability***

Manfaat yang ditentukan

Defined benefits

Liabilitas imbalan kerja jangka panjang merupakan manfaat pasti yang dibentuk dengan pendanaan khusus melalui program dana pensiun dan didasarkan pada masa kerja dan jumlah penghasilan karyawan pada saat pensiun yang dihitung menggunakan metode *Projected Unit Credit*. Pengukuran kembali liabilitas imbalan pasti langsung diakui dalam laporan posisi keuangan dan penghasilan komprehensif lain pada periode terjadinya dan tidak akan direklasifikasi ke laba rugi, namun menjadi bagian dari saldo laba. Biaya liabilitas imbalan pasti lainnya terkait dengan program imbalan pasti diakui dalam laba rugi.

Long-term employee benefits liability represents post-employment benefits, funded defined-benefit plans through a certain pension fund which amounts are determined based on years of service and salaries of the employees at the time of pension and calculated using the Projected Unit Credit. Remeasurement is reflected immediately in the statement of financial position with a charge or credit recognized in other comprehensive income in the period in which they occur and not to be reclassified to profit or loss but reflected immediately in retained earnings. All other costs related to the defined-benefit plan are recognized in profit or loss.

Kontribusi yang ditentukan

Liabilitas imbalan kerja jangka panjang merupakan imbalan pasca-kerja iuran pasti melalui dana pensiun dan didasarkan pada masa kerja dan jumlah penghasilan karyawan saat pensiun. Jumlah iuran yang terutang diakui sebagai liabilitas pada laporan posisi keuangan konsolidasian setelah dikurangi dengan jumlah yang telah dibayar dan sebagai beban dalam laba rugi.

Jika ada bagian iuran yang jatuh tempo dalam waktu lebih dari 12 bulan setelah tanggal laporan posisi keuangan, maka iuran tersebut disajikan sebesar nilai kini liabilitas yang didiskontokan.

Manfaat iuran pasti ditentukan berdasarkan akumulasi iuran dan hasil pengembangan investasi.

Defined contributions

Long-term employee benefits liability represents post-employment benefits, defined-contribution plans through a certain pension fund which amounts are determined based on years of service and salaries of the employees at the time of pension. The contribution payable is accrued as a liability after deducting any amount already paid in the consolidated statement of financial position and an expense in profit or loss.

If a part of the contributions due in a period in excess of twelve (12) months from the statement of financial position date, the contributions are presented at its discounted amount.

Defined-contribution plans benefits are determined based on accumulated contributions and returns on investments.

**ff. Segmen Operasi**

Informasi segmen disusun sesuai dengan kebijakan akuntansi yang dianut dalam penyusunan dan penyajian laporan keuangan.

Segmen operasi diidentifikasi berdasarkan laporan internal komponen-komponen Grup yang secara berkala dilaporkan kepada pengambil keputusan operasional dalam rangka alokasi sumber daya ke dalam segmen dan penilaian kinerja Perusahaan.

**ff. Operating Segment**

Segment information is prepared using the accounting policies adopted for preparing and presenting the financial statements.

Operating segments are identified based on the basis of internal reports about components of the Group that are regularly reported to the chief operating decision maker in the context of allocation of resources to the segments and assessment of its performance.

**gg. Provisi**

Provisi diakui jika Grup mempunyai kewajiban kini (hukum maupun konstruktif) sebagai akibat peristiwa masa lalu, yang memungkinkan Grup harus menyelesaikan kewajiban tersebut dan estimasi yang andal mengenai jumlah kewajiban tersebut dapat dibuat.

Jumlah yang diakui sebagai provisi adalah hasil estimasi terbaik pengeluaran yang diperlukan untuk menyelesaikan kewajiban kini pada tanggal pelaporan, dengan mempertimbangkan risiko dan ketidakpastian terkait kewajiban tersebut.

**gg. Provisions**

Provisions are recognized when the Group has present obligation (legal or constructive) as a result of a past event, it is probable that the Group will be required to settle the obligation, and a reliable estimate can be made of the amount of the obligation.

The amount recognized as a provision is the best estimate of the consideration required to settle the obligation at the reporting date, taking into account the risks and uncertainties surrounding the obligation.

**hh. Peristiwa Setelah Periode Pelaporan**

Peristiwa-peristiwa yang terjadi setelah periode pelaporan yang menyediakan tambahan informasi mengenai posisi keuangan Grup pada tanggal laporan posisi keuangan (peristiwa penyesuai), jika ada, telah tercermin dalam laporan keuangan konsolidasian. Peristiwa-peristiwa yang terjadi setelah periode pelaporan yang tidak memerlukan penyesuaian (peristiwa non-penyesuai), apabila jumlahnya material, telah diungkapkan dalam laporan keuangan konsolidasian.

**hh. Events After the Reporting Period**

Past year-end events that provide additional information regarding the Group's financial position at the reporting date (adjusting events), if any, are reflected in the consolidated financial statements. Past year-end events that are not adjusting (non-adjusting events), when material, are disclosed in the consolidated financial statements.

## 3. Penggunaan Estimasi, Pertimbangan dan Asumsi Manajemen

Dalam penerapan kebijakan akuntansi Grup, seperti yang diungkapkan dalam Catatan 2 pada laporan keuangan konsolidasian, manajemen harus membuat estimasi, pertimbangan, dan asumsi atas nilai tercatat aset dan liabilitas yang tidak tersedia oleh sumber-sumber lain. Estimasi dan asumsi tersebut, berdasarkan pengalaman historis dan faktor lain yang dipertimbangkan relevan.

Manajemen berkeyakinan bahwa pengungkapan berikut telah mencakup ikhtisar estimasi, pertimbangan dan asumsi signifikan yang dibuat oleh manajemen, yang berdampak terhadap jumlah-jumlah yang dilaporkan serta pengungkapan dalam laporan keuangan konsolidasian.

**Pertimbangan**

Pertimbangan-pertimbangan berikut dibuat oleh manajemen dalam proses penerapan kebijakan akuntansi Grup yang memiliki dampak yang paling signifikan terhadap jumlah-jumlah yang diakui dalam laporan keuangan konsolidasian:

a. Mata Uang Fungsional

Mata uang fungsional Grup adalah mata uang lingkungan ekonomi utama dimana masing-masing entitas beroperasi. Mata uang tersebut adalah yang paling mempengaruhi harga jual barang dan jasa, dan mata uang dari negara yang kekuatan persaingan dan peraturannya sebagian besar menentukan harga jual barang dan jasa entitas, dan merupakan mata uang yang mana dana dari aktivitas pendanaan dihasilkan.

## 3. Management Use of Estimates, Judgments and Assumptions

In applying of the Group’s accounting policies, which are described in Note 2 to the consolidated financial statements, management is required to make estimates, judgments, and assumptions about the carrying amounts of assets and liabilities that are not readily available from other sources. The estimates and assumptions are based on historical experience and other factors that are considered to be relevant.

Management believes that the following represent a summary of the significant estimates, judgments and assumptions made that affected certain reported amounts of and disclosures in the consolidated financial statements.

**Judgments**

The following judgments are made by management in the process of applying the Group’s accounting policies that have the most significant effects on the amounts recognized in the consolidated financial statements:

a. Functional Currency

The functional currency of the Group is the currency of the economic environment in which it operates. It is the currency, among others, that mainly influences sales prices for goods and services, and the country whose competitive forces and regulations mainly determine the sales price of its good and services, and the currency in which fund from financing acitivities are generated.

b. Klasifikasi Aset Keuangan dan Liabilitas Keuangan

Grup menentukan klasifikasi aset dan liabilitas tertentu sebagai aset keuangan dan liabilitas keuangan dengan menilai apakah aset dan liabilitas tersebut memenuhi definisi yang ditetapkan dalam PSAK No. 109. Aset keuangan dan liabilitas keuangan dicatat sesuai dengan kebijakan akuntansi Grup sebagaimana diungkapkan dalam Catatan 2.

b. Classification of Financial Assets and Financial Liabilities

The Group determines the classifications of certain assets and liabilities as financial assets and liabilities by judging if they meet the definition set forth in SFAS No. 109. Accordingly, the financial assets and liabilities are accounted for in accordance with the Group's accounting policies as disclosed in Note 2.

c. Cadangan Kerugian Penurunan Nilai Aset Keuangan

Pada setiap tanggal pelaporan, Grup menilai apakah risiko kredit atas instrumen keuangan telah meningkat secara signifikan sejak pengakuan awal. Ketika melakukan penilaian tersebut, Grup mempertimbangkan perubahan risiko gagal bayar yang terjadi selama umur instrumen keuangan. Dalam melakukan penilaian tersebut, Grup membandingkan risiko gagal bayar yang terjadi pada tanggal pelaporan dengan risiko gagal bayar pada saat pengakuan awal, serta mempertimbangkan informasi, termasuk informasi masa lalu, kondisi saat ini, dan informasi bersifat perkiraan masa depan (*forward-looking*), yang wajar dan terdukung yang tersedia tanpa biaya atau upaya berlebihan.

Grup mengukur cadangan kerugian sepanjang umurnya, jika risiko kredit atas instrumen keuangan tersebut telah meningkat secara signifikan sejak pengakuan awal, jika tidak, maka Grup mengukur cadangan kerugian untuk instrumen keuangan tersebut sejumlah kerugian kredit ekspektasian 12 bulan. Suatu evaluasi yang bertujuan untuk mengidentifikasi jumlah cadangan kerugian ekspektasian yang harus dibentuk, dilakukan secara berkala pada setiap periode pelaporan. Oleh karena itu, saat dan besaran jumlah cadangan kerugian ekspektasian yang tercatat pada setiap periode dapat berbeda tergantung pada pertimbangan atas informasi yang tersedia atau berlaku pada saat itu.

c. Allowance for Impairment of Financial Assets

At each reporting date, the Group shall assess whether the credit risk of a financial instrument has increased significantly since initial recognition. When making the assessment, the Group shall use the change in the risk of default over the expected life of the financial instrument. To make that assessment, the Group shall compare the risk of default occurring on the financial instrument as at the reporting date with the risk of default occurring on the financial instrument as at the date of initial recognition and consider reasonable and supportable information, including past data, current condition and forward-looking information that is available without undue cost or effort.

The Group shall measure the loss allowance for a financial instrument at an amount equal to the lifetime expected credit losses if the credit risk on that financial instrument has increased significantly since initial recognition, otherwise, the Group shall measure the loss allowance for that financial instrument at an amount equal to 12-month expected credit losses. Evaluation of financial assets to determine the allowance for expected loss to be provided is performed periodically in each reporting period. Therefore, the timing and amount of allowance for expected credit loss recorded at each period might differ based on the judgments and estimates that are available or valid at each period.

Nilai tercatat aset keuangan Grup (tidak termasuk akun syariah) pada tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut:

The carrying values of the Group's financial assets (excluding sharia accounts) as of December 31, 2024 and 2023 are as follows:

| | 2024 | 2023 | |
|---|---|---|---|
| *Diukur pada nilai wajar melalui penghasilan komprehensif lain* | | | *Measured at fair value through other comprehensive income* |
| Efek-efek - bersih | | | Securities - net |
| Obligasi korporasi | 4.863.121 | 5.673.001 | Corporate bonds |
| *Diukur pada biaya perolehan diamortisasi* | | | *Measured at amortized cost* |
| Kas | 469.088 | 375.753 | Cash |
| Giro pada bank Indonesia | 4.694.101 | 6.022.812 | Demand deposits with bank Indonesia |
| Giro pada bank lain - bersih | 1.899.534 | 2.655.935 | Demand deposits with other banks - net |
| Penempatan pada bank lain dan bank Indonesia - bersih | 8.281.976 | 6.263.377 | Placement with other bank and bank Indonesia - net |
| Efek-efek - bersih | 1.687.678 | 1.193.364 | Securties - net |
| Efek yang dibeli dengan janji dijual kembali - bersih | 192.215 | - | Securities purchased under agreements to resell - net |
| Kredit yang diberikan - bersih | 10.407.686 | 10.954.956 | Loans - net |
| Tagihan akseptasi - bersih | 38.129 | 78.304 | Acceptances receivables - net |
| Pendapatan yang masih akan diterima | 272.974 | 300.579 | Accrued income |
| Aset lain-lain - bersih | 123.626 | 141.121 | Other assets - net |
| **Jumlah** | **32.930.128** | **33.659.202** | **Total** |

d. Transaksi Sewa

*Grup sebagai penyewa*

Grup telah menandatangani sejumlah perjanjian sewa ruangan, kendaraan, dan sewa mesin ATM. Grup menentukan bahwa sewa ruangan dan kendaraan memenuhi kriteria pengakuan dan pengukuran aset hak-guna dan liabilitas sewa sesuai dengan PSAK No. 116, Sewa.

*Grup sebagai pesewa*

Grup telah menandatangani sejumlah perjanjian sewa ruangan. Grup menentukan bahwa sewa tersebut adalah sewa operasi karena Grup menanggung secara signifikan seluruh risiko dan manfaat dari kepemilikan aset-aset tersebut.

e. Pajak Penghasilan

Pertimbangan yang signifikan dibutuhkan untuk menentukan jumlah pajak penghasilan. Terdapat sejumlah transaksi dan perhitungan yang menimbulkan ketidakpastian penentuan jumlah pajak penghasilan karena interpretasi atas peraturan pajak yang berbeda.

d. Lease Transactions

*Group as lessee*

The Group has entered into various lease agreements for commercial spaces, vehicles and ATM machines. The Group has determined that commercial spaces, and vehicles leases meet the criteria for recognition and measurement of right-of-use assets and lease liabilities in accordance with SFAS No. 116, Leases.

*Group as lessor*

The Group has entered into lease of commercial space agreements. The Group has determined that those are operating leases since the Group bears substantially all the significant risks and rewards of ownership of the related assets.

e. Income Taxes

Significant judgment is required in determining the provision for income taxes. There are many transactions and calculations for which the ultimate tax determination is uncertain due to different interpretation of tax regulations.

Jika hasil pemeriksaan pajak berbeda dengan jumlah yang sebelumnya telah dibukukan, maka selisih tersebut akan berdampak terhadap aset dan liabilitas pajak kini dan tangguhan dalam periode dimana hasil pemeriksaan tersebut terjadi.

If the final tax outcome of these matters is different from the amounts that were initially recorded, such differences will have an impact on the current and deferred income tax assets and liabilities in the period in which the results of the examination occurred.

**Estimasi dan Asumsi**

Asumsi utama mengenai masa depan dan sumber utama lain dalam mengestimasi ketidakpastian pada tanggal pelaporan yang mempunyai risiko signifikan yang dapat menyebabkan penyesuaian material terhadap nilai tercatat aset dan liabilitas dalam periode berikutnya diungkapkan di bawah ini. Grup mendasarkan asumsi dan estimasi pada parameter yang tersedia saat laporan keuangan konsolidasian disusun. Kondisi yang ada dan asumsi mengenai perkembangan masa depan dapat berubah karena perubahan situasi pasar yang berada di luar kendali Grup. Perubahan tersebut tercermin dalam asumsi ketika keadaan tersebut terjadi:

**Estimates and Assumptions**

The key assumptions concerning the future and other key sources of estimation uncertainty at the reporting date that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next financial period are disclosed below. The Group based its assumptions and estimates on parameters available when the consolidated financial statements were prepared. Existing circumstances and assumptions about future developments may change due to market changes on circumstances arising beyond the control of the Group. Such changes are reflected in the assumptions when they occur:

a. Nilai Wajar Aset Keuangan dan Liabilitas Keuangan

Standar Akuntansi Keuangan di Indonesia mensyaratkan pengukuran aset keuangan dan liabilitas keuangan tertentu pada nilai wajarnya, dan penyajian ini mengharuskan penggunaan estimasi. Komponen pengukuran nilai wajar yang signifikan ditentukan berdasarkan bukti-bukti obyektif yang dapat diverifikasi (seperti nilai tukar, suku bunga), sedangkan saat dan besaran perubahan nilai wajar dapat menjadi berbeda karena penggunaan metode penilaian yang berbeda.

Nilai wajar aset keuangan dan liabilitas diungkapkan pada Catatan 40.

a. Fair Value of Financial Assets and Financial Liabilities

Indonesian Financial Accounting Standards require measurement of certain financial assets and liabilities at fair values, and the disclosure requires the use of estimates. Significant component of fair value measurement is determined based on verifiable objective evidence (i.e., foreign exchange rate, interest rate), while timing and amount of changes in fair value might differ due to different valuation method used.

The fair value of financial assets and liabilities are set out in Note 40.

b. Revaluasi Aset Tetap

Grup mengukur tanah dan bangunan pada nilai revaluasi, dan perubahan nilai wajar aset tersebut diakui dalam penghasilan komprehensif lain. Grup memakai jasa penilai independen untuk menentukan nilai wajar aset. Teknik penilaian yang digunakan untuk menentukan nilai wajar tanah dan bangunan diungkapkan dalam Catatan 13.

b. Revaluation of Property and Equipment

The Group measures land and buildings at revalued amounts, and changes in fair value of these assets are recognized in other comprehensive income. The Group engaged an independent appraiser to determine the fair value of these assets. Valuation techniques used to determine the fair value of land and buildings are disclosed in Note 13.

c. Estimasi Masa Manfaat Aset Tetap

Masa manfaat dari masing-masing aset tetap Grup diestimasi berdasarkan jangka waktu aset tersebut diharapkan tersedia untuk digunakan. Estimasi tersebut didasarkan pada penilaian kolektif berdasarkan bidang usaha yang sama, evaluasi teknis internal dan pengalaman dengan aset sejenis. Estimasi masa manfaat setiap aset ditelaah secara berkala dan diperbarui jika estimasi berbeda dari perkiraan sebelumnya yang disebabkan karena pemakaian, usang secara teknis atau komersial serta keterbatasan hak atau pembatasan lainnya terhadap penggunaan aset. Dengan demikian, hasil operasi di masa mendatang mungkin dapat terpengaruh secara signifikan oleh perubahan dalam jumlah dan waktu terjadinya biaya karena perubahan yang disebabkan oleh faktor-faktor yang disebutkan di atas. Penurunan estimasi masa manfaat ekonomis setiap aset tetap akan menyebabkan kenaikan beban penyusutan dan penurunan nilai tercatat aset tetap.

Nilai tercatat aset tetap diungkapkan pada Catatan 13.

c. Estimated Useful Lives of Property and Equipment

The useful life of each of the item of the Group's property and equipment is estimated based on the period over which the asset is expected to be available for use. Such estimation is based on a collective assessment of similar business, internal technical evaluation and experience with similar assets. The estimated useful life of each asset is reviewed periodically and updated if expectations differ from previous estimates due to physical wear and tear, technical or commercial obsolescence, and legal or other limits on the use of the asset. It is possible, however, that future results of operations could be materially affected by changes in the amounts and timing of recorded expenses brought about by changes in the factors mentioned above. A reduction in the estimated useful life of any item of property and equipment would increase the recorded depreciation and decrease the carrying values of these assets.

The carrying values of these assets are disclosed in Note 13.

d. Imbalan Kerja Jangka Panjang

Penentuan liabilitas imbalan kerja jangka panjang dipengaruhi oleh asumsi-asumsi tertentu yang digunakan oleh aktuaris dalam menghitung jumlah tersebut. Asumsi-asumsi tersebut dijelaskan dalam catatan 41, dan mencakup, antara lain, tingkat kenaikan gaji, dan tingkat diskonto yang ditentukan dengan mengacu pada imbal atas bunga obligasi pemerintah dalam mata uang yang sama dengan mata uang pembayaran imbalan dan memiliki jangka waktu yang mendekati estimasi jangka waktu liabilitas imbalan kerja jangka panjang tersebut. Hasil aktual yang berbeda dengan asumsi Grup dibukukan pada penghasilan komprehensif lain dan dengan demikian, berdampak pada jumlah penghasilan komprehensif lain yang diakui dan liabilitas yang tercatat pada periode-periode mendatang. Manajemen berkeyakinan bahwa asumsi-asumsi yang digunakan adalah tepat dan wajar, namun demikian perbedaan signifikan pada hasil aktual, atau perubahan signifikan dalam asumsi-asumsi tersebut dapat berdampak signifikan pada jumlah liabilitas imbalan kerja.

d. Long-term Employee Benefits

The determination of the long-term employee benefits is dependent on the selection of certain assumptions used by actuary in calculating such amounts. Those assumptions are described in Note 41 and include, among others, rate of salary increase, and discount rate which is determined after giving consideration to interest rates of high-quality corporates bonds that are denominated in the currency in which the benefits are to be paid and have terms of maturity approximating the terms of related employee benefits liability. Actual results that differ from the group's assumptions are charged to other comprehensive income and therefore, generally affect the recognized other comprehensive income and recorded obligation in such future period. While it is believed that the group's assumptions are reasonable and appropriate, significant differences in actual experience or significant changes in assumptions may materially affect the amount of long-term employee benefits liability.

Nilai tercatat liabilitas imbalan kerja jangka panjang diungkapkan pada Catatan 41.

The carrying value of long-term employee benefit liability is disclosed in Note 41.

e. Penurunan Nilai Aset Non-Keuangan

Penelaahan atas penurunan nilai dilakukan apabila terdapat indikasi penurunan nilai aset tertentu. Penentuan nilai wajar aset membutuhkan estimasi arus kas yang diharapkan akan dihasilkan dari pemakaian berkelanjutan dan pelepasan akhir atas aset tersebut. Perubahan signifikan dalam asumsi-asumsi yang digunakan untuk menentukan nilai wajar dapat berdampak signifikan pada nilai terpulihkan dan jumlah kerugian penurunan nilai yang terjadi mungkin berdampak material pada hasil operasi Grup.

Nilai tercatat aset non-keuangan berupa aset tetap dan aset lain-lain (agunan yang diambil alih) diungkapkan pada Catatan 13 dan 16.

e. Impairment of Non-financial Assets

Impairment review is performed when certain impairment indicators are present. Determining the fair value of assets requires the estimation of cash flows expected to be generated from the continued use and ultimate disposition of such assets. Any significant changes in the assumptions used in determining the fair value may materially affect the assessment of recoverable values and any resulting impairment loss could have a material impact the Group's results of operations.

The carrying value of these assets in the form of property and equipment, and other assets (foreclosed properties) are set out in Notes 13 and 16.

f. Aset Pajak Tangguhan

Aset pajak tangguhan diakui untuk semua perbedaan temporer antara nilai tercatat aset dan liabilitas pada laporan keuangan dengan dasar pengenaan pajak jika besar kemungkinan bahwa jumlah laba fiskal akan memadai untuk pemanfaatan perbedaan temporer yang diakui. Estimasi manajemen yang signifikan diperlukan untuk menentukan jumlah aset pajak tangguhan yang diakui berdasarkan kemungkinan waktu terealisasinya dan jumlah laba kena pajak pada masa mendatang serta strategi perencanaan pajak masa depan. Aset pajak tangguhan diungkapkan pada Catatan 35.

f. Deferred Tax Assets

Deferred tax assets are recognized for all temporary differences between the financial statements' carrying amounts of existing assets and liabilities and their respective tax bases to the extent that it is probable that taxable profit will be available against which the temporary differences can be utilized. Significant management estimates are required to determine the amount of deferred tax assets that can be recognized, based upon the likely timing and the level of future taxable profits together with future tax planning strategies. Deferred tax assets is disclosed in Notes 35.

## 4. Giro pada Bank Indonesia

## 4. Demand Deposits with Bank Indonesia

| | 2024 | 2023 | |
|---|---|---|---|
| Rupiah | 5.032.452 | 5.602.464 | Rupiah |
| Mata uang asing (Catatan 39) | 673.985 | 420.348 | Foreign currency (Note 39) |
| **Jumlah** | **5.706.437** | **6.022.812** | **Total** |

Pada tanggal 31 Desember 2024 dan 2023 termasuk dalam giro pada Bank Indonesia adalah giro yang didasarkan pada prinsip perbankan syariah masing-masing sebesar Rp1.012.337 dan Rp nihil.

As of December 31, 2024 and 2023, this account includes current accounts based on the principles of Islamic banking amounting to Rp1,012,337 and Rp nil, respectively.

Giro Wajib Minimum (GWM) Bank sesuai dengan Peraturan Bank Indonesia dan Peraturan Anggota Dewan Gubernur (PADG) diungkapkan pada Catatan 50a.

Minimum Statutory Reserves (GWM) Bank in accordance with Bank Indonesia (BI) Regulation of Members of the Board of Governors (PADG) are disclosed in Note 50a.

## 5. Giro pada Bank Lain / 5. Demand Deposits with Other Banks

| | 2024 | 2023 | |
|---|---|---|---|
| Pihak ketiga | | | Third Parties |
| Rupiah | | | Rupiah |
| Standard Chartered Bank, Indonesia | 11.044 | 6.620 | Standard Chartered Bank, Indonesia |
| PT Bank Central Asia Tbk | 4.004 | 87.364 | PT Bank Central Asia Tbk |
| PT Maybank Indonesia Tbk | 2.685 | 10.777 | PT Maybank Indonesia Tbk |
| PT Bank Mandiri (Persero) Tbk | 930 | - | PT Bank Mandiri (Persero) Tbk |
| PT Bank CIMB Niaga Tbk, Indonesia | 887 | - | PT Bank CIMB Niaga Tbk, Indonesia |
| Lain-lain (di bawah Rp 1.000) | 156 | 64 | Others (under Rp 1,000) |
| Jumlah | 19.706 | 104.825 | Total |
| Mata uang asing (Catatan 39) | | | Foreign currencies (Note 39) |
| PT Bank CIMB Niaga Tbk | 668.666 | 71.674 | PT Bank CIMB Niaga Tbk |
| Standard Chartered Bank, Amerika Serikat | 473.438 | 363.851 | Standard Chartered Bank, United States of America |
| Bank of Amerika, Merrill Lynch, Amerika Serikat | 169.704 | 219.263 | Bank of Amerika, Merrill Lynch, United States of America |
| Citibank | 160.619 | 35.254 | Citibank |
| Deutsche Bank Trust Company Americas, Amerika Serikat | 151.576 | 66.981 | Deutsche Bank Trust Company Americas, United States of America |
| PT Bank Central Asia Tbk | 102.979 | 417.552 | PT Bank Central Asia Tbk |
| PT Bank Mandiri (Persero) Tbk | 92.886 | 1.241.544 | PT Bank Mandiri (Persero) Tbk |
| United Overseas Bank, Singapura | 75.885 | 26.131 | United Overseas Bank, Singapore |
| Oversea Chinese Banking Corporation, Singapura | 26.337 | 18.655 | Oversea Chinese Banking Corporation, Singapore |
| Bank of China, Indonesia | 25.592 | 31.758 | Bank of China, Indonesia |
| Deutsche Bank AG, Jerman | 12.267 | 12.303 | Deutsche Bank AG, Germany |
| Sumitomo Mitsui Banking Corporation, Jepang | 11.275 | 8.069 | Sumitomo Mitsui Banking Corporation, Japan |
| Aktif Bank, Turki | 6.644 | 6.779 | Aktif Bank, Turkey |
| PT Bank ICBC Indonesia | 3.911 | 3.670 | PT Bank ICBC Indonesia |
| DBS Bank, Hong Kong | 3.386 | 1.009 | DBS Bank, Hong Kong |
| Bank of China, China | 3.075 | 2.945 | Bank of China, China |
| Kookmin Bank, Korea Selatan | 3.056 | 5.290 | Kookmin Bank, South Korea |
| Bank of Communication, China | 2.508 | 4.133 | Bank of Communication, China |
| Standard Chartered Bank, Inggris | 2.346 | 5.454 | Standard Chartered Bank, Great Britain |
| Banco De Sabadell SA, Spanyol | 1.914 | 7.101 | Banco De Sabadell SA, Spain |
| PT Bank Negara Indonesia (Persero) Tbk, Singapura | 1.548 | 1.482 | PT Bank Negara Indonesia (Persero) Tbk, Singapore |
| Lain-lain (di bawah Rp 1.000) | 2.236 | 1.144 | Others (under Rp 1,000) |
| Jumlah mata uang asing | 2.001.848 | 2.552.042 | Total foreign currencies |
| Jumlah | 2.021.554 | 2.656.867 | Total |
| Cadangan kerugian penurunan nilai | (565) | (932) | Allowance for impairment losses |
| **Jumlah - bersih** | **2.020.989** | **2.655.935** | **Net** |

Kolektibilitas dan suku bunga rata-rata giro pada Bank lain sesuai dengan Peraturan Otoritas Jasa Keuangan diungkapkan pada Catatan 50b.

Collectability and average interest rate current account with other banks in accordance with Financial Services Authority Regulation are disclosed in Note 50b.

Perubahan cadangan kerugian penurunan nilai giro pada bank lain adalah sebagai berikut:

The changes in allowance for impairment losses on demand deposit with other banks are as follows:

| | 2024 | | | | |
|---|---|---|---|---|---|
| | **Tahap 1/ *Stage 1*** | **Tahap 2/ *Stage 2*** | **Tahap 3/ *Stage 3*** | **Jumlah/ *Total*** | |
| Saldo awal tahun | 932 | - | - | 932 | Balance at the beginning of the year |
| Pemulihan tahun berjalan | (367) | - | - | (367) | Reversal for current year |
| **Saldo akhir tahun** | **565** | **-** | **-** | **565** | **Balance at the end of the year** |

| | 2023 | | | | |
|---|---|---|---|---|---|
| | **Tahap 1/ *Stage 1*** | **Tahap 2/ *Stage 2*** | **Tahap 3/ *Stage 3*** | **Jumlah/ *Total*** | |
| Saldo awal tahun | 724 | - | - | 724 | Balance at the beginning of the year |
| Pembentukan tahun berjalan | 208 | - | - | 208 | Provision of current year |
| **Saldo akhir tahun** | **932** | **-** | **-** | **932** | **Balance at the end of the year** |

Manajemen berpendapat bahwa cadangan kerugian untuk penurunan nilai yang dibentuk pada tanggal 31 Desember 2024 dan 2023 adalah cukup untuk menutup kemungkinan kerugian yang mungkin timbul.

Management believes that the allowance for impairment losses as of December 31, 2024 and 2023 is adequate to cover possible losses that may be incurred.

## 6. Penempatan pada Bank Indonesia dan Bank Lain

## 6. Placements with Bank Indonesia and Other Banks

| | 2024 | | | |
|---|---|---|---|---|
| Jenis Penempatan | **Jangka Waktu/ *Term*** | **Suku Bunga Rata-rata/ *Average Interest Rate*** | **Pihak Ketiga/ *Third Parties*** | *Type of Placement* |
| | | % | | |
| Rupiah | | | | Rupiah |
| Penempatan pada Bank Indonesia | | | | Placements with Bank Indonesia |
| *Deposit facility* | 2 hari/*days* | 5,25 | 2.294.000 | Deposit facility |
| Penempatan pada bank lain | | | | Placements with other banks |
| *Call money* | 2-28 hari/*days* | 6,40 | 2.440.089 | Call money |
| Jumlah Rupiah | | | 4.734.089 | Total Rupiah |
| Mata uang asing (Catatan 39) | | | | Foreign currency (Note 39) |
| Penempatan pada Bank Indonesia | | | | Placements with Bank Indonesia |
| *Term deposit* | 2 hari/*days* | 4,53 | 3.702.316 | Term deposits |
| Penempatan pada bank lain | | | | Placements with other banks |
| *Call money* | 3-32 hari/*days* | 4,86 | 289.710 | Call money |
| Jumlah mata uang asing | | | 3.992.026 | Total foreign currency |
| Jumlah | | | 8.726.115 | Total |
| Cadangan kerugian penurunan nilai | | | (139) | Allowance for impaiment losses |
| **Jumlah - bersih** | | | **8.725.976** | **Net** |

| Jenis Penempatan | 2023 Jangka Waktu/ *Term* | 2023 Suku Bunga Rata-rata/ *Average Interest Rate* | 2023 Pihak Ketiga/ *Third Parties* | *Type of Placement* |
|---|---|---|---|---|
| | | % | | |
| Rupiah | | | | Rupiah |
| Penempatan pada Bank Indonesia | | | | Placements with Bank Indonesia |
| *Deposit facility* | 4 hari/*days* | 5,25 | 1.650.000 | Deposit facility |
| Mata uang asing (Catatan 39) | | | | Foreign currency (Note 39) |
| Penempatan pada Bank Indonesia | | | | Placements with Bank Indonesia |
| *Term deposit* | 4 hari/*days* | 5,34 | 4.467.117 | Term deposits |
| Penempatan pada bank lain | | | | Placements with other banks |
| *Call money* | 7 hari/*days* | 5,65 | 146.272 | Call money |
| Jumlah mata uang asing | | | 4.613.389 | Total foreign currency |
| Jumlah | | | 6.263.389 | Total |
| Cadangan kerugian penurunan nilai | | | (12) | Allowance for impaiment losses |
| **Jumlah - bersih** | | | **6.263.377** | **Net** |

Pada tanggal 31 Desember 2024 dan 2023, penempatan pada bank lain dalam bentuk *call money* dan penempatan pada Bank Indonesia dalam bentuk *deposit facility* dan *term deposit* dikategorikan sebagai aset keuangan pada biaya perolehan diamortisasi.

As of December 31, 2024 and 2023, placements with other banks are in the form of call money and placement with Bank Indonesia are in the form of deposit facility and term deposits are classified as financial assets at amortized cost.

Penempatan pada bank lain dalam mata uang Rupiah dan asing merupakan penempatan pada:

Details of placements with other banks in Rupiah and foreign exchange are as follows:

| Nama Bank | 2024 | 2023 | Name of Bank |
|---|---|---|---|
| Rupiah | | | Rupiah |
| *Call money* | | | Call money |
| PT Bank Maybank Indonesia Tbk | 200.000 | - | PT Bank Maybank Indonesia Tbk |
| PT Bank Pembangunan Daerah | | - | PT Bank Pembangunan Daerah |
| Kalimantan Timur dan Kalimantan Utara | 200.000 | - | Kalimantan Timur dan Kalimantan Utara |
| PT Bank Permata Tbk | 200.000 | - | PT Bank Permata Tbk |
| PT Bank China Construction Bank Indonesia Tbk | 150.000 | - | PT Bank China Construction Bank Indonesia Tbk |
| PT Bank CIMB Niaga Tbk | 150.000 | - | PT Bank CIMB Niaga Tbk |
| PT Bank CTBC Indonesia | 150.000 | - | PT Bank CTBC Indonesia |
| PT Bank DKI Jakarta | 150.000 | - | PT Bank DKI Jakarta |
| PT Bank Pembangunan Daerah | | - | PT Bank Pembangunan Daerah |
| Kalimantan Selatan | 150.000 | - | Kalimantan Selatan |
| PT Bank Pembangunan Daerah | | - | PT Bank Pembangunan Daerah |
| Sumatera Selatan dan Bangka Belitung | 150.000 | - | Sumatera Selatan dan Bangka Belitung |
| PT Bank Danamon Indonesia Tbk | 100.000 | - | PT Bank Danamon Indonesia Tbk |
| PT Bank Mega Tbk | 100.000 | - | PT Bank Mega Tbk |
| PT Bank Pembangunan Daerah | | - | PT Bank Pembangunan Daerah |
| Kalimantan Tengah | 100.000 | - | Kalimantan Tengah |
| PT Bank Pembangunan Daerah | | - | PT Bank Pembangunan Daerah |
| Sulawesi Selatan dan Sulawesi Barat | 100.000 | - | Sulawesi Selatan dan Sulawesi Barat |
| PT Bank Rakyat Indonesia (Persero) Tbk | 100.000 | - | PT Bank Rakyat Indonesia (Persero) Tbk |
| PT Bank Raya Indonesia Tbk | 100.000 | - | PT Bank Raya Indonesia Tbk |
| PT Bank Syariah Indonesia Tbk | 100.089 | - | PT Bank Syariah Indonesia Tbk |
| PT Bank UOB Indonesia | 100.000 | - | PT Bank UOB Indonesia |
| PT Bank Victoria International Tbk | 50.000 | - | PT Bank Victoria International Tbk |
| PT Bank Pembangunan Daerah Jawa Tengah | 50.000 | - | PT Bank Pembangunan Daerah Jawa Tengah |
| PT Bank KB Bukopin Tbk | 40.000 | - | PT Bank KB Bukopin Tbk |
| **Jumlah** | **2.440.089** | **-** | **Total** |

| Nama Bank | 2024 | 2023 | Name of Bank |
|---|---|---|---|
| | US$ | US$ | |
| Mata uang asing | | | Foreign Exchange |
| *Call money* | | | Call money |
| PT Bank Shinhan Indonesia | 9.000.000 | - | PT Bank Shinhan Indonesia |
| PT Bank KB Bukopin Tbk | 6.000.000 | - | PT Bank KB Bukopin Tbk |
| State Bank of India | 3.000.000 | - | State Bank of India |
| PT Bank CTBC Indonesia | - | 9.500.000 | PT Bank CTBC Indonesia |
| **Jumlah** | **18.000.000** | **9.500.000** | **Total** |

Kolektibilitas penempatan pada Bank Indonesia dan bank lain sesuai Peraturan Otoritas Jasa Keuangan diungkapkan pada Catatan 50c.

Collectibility placement with Bank Indonesia and other banks in accordance with Financial Services Authority Regulation are disclosed in Note 50c.

Perubahan cadangan kerugian penurunan nilai penempatan pada Bank Indonesia dan bank lain adalah sebagai berikut:

The changes in allowance for impairment losses on placements with Bank Indonesia and other banks are as follows:

| | 2024 | | | | |
|---|---|---|---|---|---|
| | Tahap 1/ *Stage 1* | Tahap 2/ *Stage 2* | Tahap 3/ *Stage 3* | Jumlah/ *Total* | |
| Saldo awal tahun | 12 | - | - | 12 | Balance at the beginning of the year |
| Pembentukan tahun berjalan | 127 | - | - | 127 | Provision of current year |
| **Saldo akhir tahun** | **139** | **-** | **-** | **139** | **Balance at the end of the year** |

| | 2023 | | | | |
|---|---|---|---|---|---|
| | Tahap 1/ *Stage 1* | Tahap 2/ *Stage 2* | Tahap 3/ *Stage 3* | Jumlah/ *Total* | |
| Saldo awal tahun | 113 | - | - | 113 | Balance at the beginning of the year |
| Pemulihan tahun berjalan | (101) | - | - | (101) | Reversal for current year |
| **Saldo akhir tahun** | **12** | **-** | **-** | **12** | **Balance at the end of the year** |

Manajemen berpendapat bahwa cadangan kerugian untuk penurunan nilai yang dibentuk pada tanggal 31 Desember 2024 dan 2023 adalah cukup untuk menutup kemungkinan kerugian yang timbul.

Management believes that the allowance for impairment losses as of December 31, 2024 and 2023 is adequate to cover possible losses arising.

Pada tanggal 31 Desember 2024 dan 2023, Grup tidak memiliki dana yang tidak dapat dicairkan pada bank bermasalah, bank beku operasi atau dibawah likuidasi.

As of December 31, 2024 and 2023, the Group did not have undisbursed funds in troubled banks, frozen bank operations or under liquidation.

## 7. Efek-Efek / 7. Securities

a. Jenis dan tujuan investasi efek-efek adalah sebagai berikut:

a. The details of securities by type and purpose of investments are as follows:

| | 2024 | 2023 | |
|---|---|---|---|
| Pihak berelasi (Catatan 37) | | | Related parties (Note 37) |
| Rupiah | | | Rupiah |
| *Diukur pada biaya perolehan diamortisasi* | | | *At amortized cost* |
| Obligasi korporasi | 41.725 | - | Corporate bonds |
| *Diukur pada nilai wajar melalui laba rugi* | | | *At fair value through profit and loss* |
| Unit reksadana | 1.021.720 | 1.130.334 | Mutual funds |
| Jumlah Rupiah-pihak berelasi | 1.063.445 | 1.130.334 | Total Rupiah-related parties |
| Mata uang asing (Catatan 39) | | | Foreign currencies (Note 39) |
| *Diukur pada biaya perolehan diamortisasi* | | | *At amortized cost* |
| Tagihan atas wesel ekspor | 15.695 | 10.469 | Export bills receivable |
| Jumlah mata uang asing-pihak berelasi | 15.695 | 10.469 | Total foreign currencies-related parties |
| Jumlah - pihak berelasi | 1.079.140 | 1.140.803 | Total - related parties |

| | 2024 | 2023 | |
|---|---|---|---|
| Pihak ketiga | | | Third parties |
| Rupiah | | | Rupiah |
| *Diukur pada nilai wajar melalui laba rugi* | | | *At fair value through profit and loss* |
| Obligasi Pemerintah | 1.549.188 | - | Government bonds |
| Unit reksadana | 955.329 | 861.814 | Mutual funds |
| Jumlah diukur pada nilai wajar melalui laba rugi | 2.504.517 | 861.814 | Total at fair value through profit and loss - trading |
| *Diukur pada nilai wajar melalui penghasilan komprehensif lain* | | | *At fair value through other comprehensive income* |
| Obligasi Pemerintah | 4.467.144 | 7.040.628 | Government bonds |
| Obligasi korporasi | 6.948.093 | 5.913.385 | Corporate bonds |
| Jumlah diukur pada nilai wajar melalui penghasilan komprehensif lain | 11.415.237 | 12.954.013 | Total at fair value through other comprehensive income |
| *Diukur pada biaya perolehan diamortisasi* | | | *At amortized cost* |
| Obligasi Pemerintah | 5.697.011 | 2.363.861 | Government bonds |
| Obligasi korporasi | 26.150 | 10.212 | Corporate bonds |
| Sertifikat pengelolaan dana berdasarkan prinsip syariah | 250.000 | - | Sharia compliant interbank fund management certificate |
| Sertifikat investasi mudharabah antarbank syariah | 400.000 | - | Certificate of sharia interbank mudharabah investment |
| Tagihan atas wesel ekspor | - | 1.527 | Export bills receivable |
| Jumlah biaya perolehan di amortisasi | 6.373.161 | 2.375.600 | Total at amortized cost |
| Jumlah Rupiah-pihak ketiga | 20.292.915 | 16.191.427 | Total Rupiah-third parties |
| Mata uang asing (Catatan 39) | | | Foreign currencies (Note 39) |
| *Diukur pada nilai wajar melalui laba rugi* | | | *At fair value through profit and loss* |
| Unit reksadana | - | 15.441 | Mutual funds |
| Obligasi Pemerintah | - | 326.954 | SBBI |
| Jumlah diukur pada nilai wajar melalui laba rugi | - | 342.395 | Total at fair value through profit and loss - trading |
| *Diukur pada biaya perolehan diamortisasi* | | | *At amortized cost* |
| Obligasi Pemerintah | 16.189 | 15.527 | Government Bond |
| Obligasi korporasi | 101.110 | 97.103 | Corporate bonds |
| Tagihan atas wesel ekspor | 17.125 | 27.151 | Export bills receivable |
| Jumlah diukur pada biaya perolehan diamortisasi | 134.424 | 139.781 | Total at amortized cost |
| *Diukur pada nilai wajar melalui penghasilan komprehensif lain* | | | *At fair value through other comprehensive income* |
| Obligasi Pemerintah | 220.818 | 70.209 | Government Bonds |
| Obligasi korporasi | 395.978 | 247.456 | Corporate bond |
| Jumlah diukur pada nilai wajar melalui penghasilan komprehensif lain | 616.796 | 317.665 | Total at fair value through other comprehensive income |
| Jumlah-mata uang asing-pihak ketiga | 751.220 | 799.841 | Total-foreign currency-third parties |
| Jumlah-pihak ketiga | 21.044.135 | 16.991.268 | Total-third parties |
| Jumlah | 22.123.275 | 18.132.071 | Total |
| Cadangan kerugian penurunan nilai | (245) | (269) | Allowance for impairment losses |
| **Jumlah - bersih** | **22.123.030** | **18.131.802** | **Net** |

b. Efek-efek yang diukur pada biaya perolehan diamortisasi pada 31 Desember 2024 dan 2023 berdasarkan jangka waktu dan jatuh tempo adalah sebagai berikut:

b. The details of securities measured at amortized cost as of December 31, 2024 and 2023 based on contractual and remaining maturity follows:

| | 2024 | | | | |
|---|---|---|---|---|---|
| | Sampai dengan 1 tahun/ *1 year or less* | Lebih dari 1-5 tahun/ *More than 1 year until 5 years* | Lebih dari 5 tahun/ *More than 5 years* | Jumlah/ *Total* | |
| Berdasarkan jangka waktu | | | | | Based on contractual maturity |
| Rupiah | | | | | Rupiah |
| Obligasi Pemerintah | 2.850.000 | 1.005 | 2.846.007 | 5.697.012 | Government bonds |
| Obligasi korporasi | - | 57.725 | 10.149 | 67.874 | Corporate bonds |
| Sertifikat pengelolaan dana berdasarkan prinsip syariah | 250.000 | - | - | 250.000 | Sharia interbank compliant fund management certificate |
| Sertifikat investasi mudharabah antarbank syariah | 400.000 | - | - | 400.000 | Certificate of sharia interbank mudharabah investment |
| Jumlah - Rupiah | 3.500.000 | 58.730 | 2.856.156 | 6.414.886 | Total - Rupiah |
| Mata uang asing (Catatan 39) | | | | | Foreign currencies (Note 39) |
| Obligasi korporasi | - | 8.006 | 93.105 | 101.111 | Corporate bonds |
| Obligasi Pemerintah | - | - | 16.189 | 16.189 | Government bonds |
| Tagihan atas wesel ekspor | 32.820 | - | - | 32.820 | Export bills receivables |
| Jumlah - mata uang asing | 32.820 | 8.006 | 109.294 | 150.120 | Total - foreign currencies |
| **Jumlah** | **3.532.820** | **66.736** | **2.965.450** | **6.565.006** | **Total** |
| Berdasarkan jatuh tempo | | | | | Based on remaining maturity |
| Rupiah | | | | | Rupiah |
| Obligasi Pemerintah | 2.851.005 | 169.752 | 2.676.255 | 5.697.012 | Government bonds |
| Obligasi korporasi | - | 67.874 | - | 67.874 | Corporate bonds |
| Sertifikat pengelolaan dana berdasarkan prinsip syariah | 250.000 | - | - | 250.000 | Sharia interbank compliant fund management certificate |
| Sertifikat investasi mudharabah antarbank syariah | 400.000 | - | - | 400.000 | Certificate of sharia interbank mudharabah investment |
| Jumlah - Rupiah | 3.501.005 | 237.626 | 2.676.255 | 6.414.886 | Total - Rupiah |
| Mata uang asing (Catatan 39) | | | | | Foreign currencies (Note 39) |
| Obligasi korporasi | 8.006 | - | 93.105 | 101.111 | Corporate bonds |
| Obligasi Pemerintah | - | 16.189 | - | 16.189 | Government bonds |
| Tagihan atas wesel ekspor | 32.820 | - | - | 32.820 | Export bills receivables |
| Jumlah - mata uang asing | 40.826 | 16.189 | 93.105 | 150.120 | Total - foreign currencies |
| **Jumlah** | **3.541.831** | **253.815** | **2.769.360** | **6.565.006** | **Total** |

| | 2023 | | | | |
|---|---|---|---|---|---|
| | Sampai dengan 1 tahun/ *1 year or less* | Lebih dari 1-5 tahun/ *More than 1 year until 5 years* | Lebih dari 5 tahun/ *More than 5 years* | Jumlah/ *Total* | |
| Berdasarkan jangka waktu | | | | | Based on contractual maturity |
| Rupiah | | | | | Rupiah |
| Obligasi Pemerintah | 426.868 | 51.199 | 1.885.794 | 2.363.861 | Government bonds |
| Obligasi korporasi | - | - | 10.212 | 10.212 | Corporate Bonds |
| Tagihan atas wesel ekspor | 1.527 | - | - | 1.527 | Export bills receivables |
| Jumlah - Rupiah | 428.395 | 51.199 | 1.896.006 | 2.375.600 | Total - Rupiah |
| Mata uang asing (Catatan 39) | | | | | Foreign currencies (Note 39) |
| Obligasi korporasi | - | 7.500 | 89.603 | 97.103 | Corporate bonds |
| Obligasi Pemerintah | - | - | 15.527 | 15.527 | Government bonds |
| Tagihan atas wesel ekspor | 37.620 | - | - | 37.620 | Export bills receivables |
| Jumlah - mata uang asing | 37.620 | 7.500 | 105.130 | 150.250 | Total - foreign currencies |
| **Jumlah** | **466.015** | **58.699** | **2.001.136** | **2.525.850** | **Total** |
| Berdasarkan jatuh tempo | | | | | Based on remaining maturity |
| Rupiah | | | | | Rupiah |
| Obligasi Pemerintah | 477.053 | 170.574 | 1.716.234 | 2.363.861 | Government bonds |
| Obligasi korporasi | - | 10.212 | - | 10.212 | Corporate bonds |
| Tagihan atas wesel ekspor | 1.527 | - | - | 1.527 | Export bills receivables |
| Jumlah - Rupiah | 478.580 | 180.786 | 1.716.234 | 2.375.600 | Total - Rupiah |
| Mata uang asing (Catatan 39) | | | | | Foreign currencies (Note 39) |
| Obligasi korporasi | - | 7.500 | 89.603 | 97.103 | Corporate bonds |
| Obligasi Pemerintah | - | 15.527 | - | 15.527 | Government bonds |
| Tagihan atas wesel ekspor | 37.620 | - | - | 37.620 | Export bills receivables |
| Jumlah - mata uang asing | 37.620 | 23.027 | 89.603 | 150.250 | Total - foreign currencies |
| **Jumlah** | **516.200** | **203.813** | **1.805.837** | **2.525.850** | **Total** |

c. Suku bunga per tahun efek-efek adalah sebagai berikut:

c. Interest rates per annum of securities are as follows:

| | 2024 | 2023 | |
|---|---|---|---|
| Rupiah | | | Rupiah |
| Obligasi Pemerintah | 0,00 - 10,25 | 5,50 - 10,25 | Government bonds |
| Obligasi korporasi | 6,80 - 11,25 | 5,50 - 11,25 | Corporate bonds |
| Tagihan atas wesel ekspor | - | 6,80 - 7,45 | Export bills receivable |
| Sertifikat investasi mudharabah antarbank syariah | 6,35 - 6,45 | - | Certificate of sharia interbank mudharabah investment |
| Mata uang asing | | | Foreign currency |
| Obligasi Pemerintah | 1,75 - 7,75 | 1,75 - 7,75 | Government bonds |
| Obligasi korporasi | 2,30 - 8,75 | 2,30 - 8,13 | Corporate bonds |
| Tagihan atas wesel ekspor | 0,00 - 6,16 | 5,33 - 6,49 | Export bills receivable |

d. Nilai wajar dari obligasi (termasuk obligasi Pemerintah) yang diukur pada biaya perolehan diamortisasi pada tanggal 31 Desember 2024 dan 2023 adalah masing-masing sebesar Rp6.565.005 dan Rp2.525.850.

d. The fair values of amortized cost bonds (including Government Bonds) as of December 31, 2024 and 2023 amounted to Rp6,565,005 and Rp2,525,850, respectively.

e. Berikut ini adalah ikhtisar peringkat dan pemeringkat efek-efek untuk tujuan investasi yang dimiliki Bank pada tanggal 31 Desember 2024 dan 2023:

e. The following is an overview of the ratings and ratings of securities for investment purposes owned by the Bank as of December 31, 2024 and 2023:

| Penerbit/ *Issuer* | 2024 | | 2023 | |
|---|---|---|---|---|
| | Peringkat/ *Rating* | Pemeringkat/ *Rater* | Peringkat/ *Rating* | Pemeringkat/ *Rater* |
| PT Adhi Karya (Persero) Tbk | idA- | Pefindo | idA- | Pefindo |
| PT Adira Dinamika Multi Finance Tbk | idAAA | Pefindo | idAAA | Pefindo |
| PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk | idAA | Pefindo | idAA | Pefindo |
| PT Barito Pacific Tbk | idA+ | Pefindo | idA+ | Pefindo |
| PT BFI Finance Indonesia Tbk | AA-(idn) | Fitch | AA-(idn) | Fitch |
| PT Chandra Asri Petrochemical Tbk | idAA- | Pefindo | idAA- | Pefindo |
| PT Hino Finance Indonesia | AA+(idn) | Fitch | AAA(idn) | Fitch |
| PT Hutama Karya (Persero) | idAA- | Pefindo | idAA- | Pefindo |
| PT Indika Energy Tbk | BB-(idn) | Fitch | - | - |
| PT Indomobil Finance Indonesia | idAA- | Pefindo | idA+ | Pefindo |
| PT Indonesia Asahan Aluminium | BBB- | Fitch | BBB- | Fitch |
| PT Indosat Tbk | idAAA | Pefindo | idAAA | Pefindo |
| PT Japfa Comfeed Tbk | B+(idn) | Fitch | B+(idn) | Fitch |
| PT Medco Energi Internasional Tbk | idAA- | Pefindo | idAA- | Pefindo |
| PT Merdeka Copper Gold Tbk | idA+ | Pefindo | idA+ | Pefindo |
| PT Pembangunan Perumahan (Persero) | idA | Pefindo | idA | Pefindo |
| PT Pertamina (Persero) | BBB(idn) | Fitch | BBB | Fitch |
| PT Perusahaan Listrik Negara (Persero) | idAAA | Pefindo | idAAA | Pefindo |
| PT Samator Indo Gas Tbk | A(idn) | Fitch | A(idn) | Fitch |
| PT Surya Artha Nusantara Finance | AA+(idn) | Fitch | AA(idn) | Fitch |
| PT Telkom Indonesia (Persero) Tbk | idAAA | Pefindo | idAAA | Pefindo |
| PT Wahana Inti Selaras | idA | Pefindo | idA | Pefindo |
| PT Wahana Ottomitra Multiartha Tbk | AA(idn) | Fitch | AA(idn) | Fitch |
| PT Wijaya Karya (Persero) Tbk | idBB- | Pefindo | idCCC | Pefindo |
| MTN PT Pos Indonesia (Persero) | A | Fitch | idBBB+ | Pefindo |
| MTN PT Wahana Interfood Nusantara Tbk | irBBB+ | KRI | irBBB+ | KRI |
| Sukuk Ijarah PT Indosat Tbk | idAAA(sy) | Pefindo | idAAA(sy) | Pefindo |
| Sukuk Ijarah PT Samator Indo Gas Tbk | A(idn) | Fitch | A(idn) | Fitch |
| Sukuk Mudharabah PT Bank Syariah Indonesia Tbk | idAAA(sy) | Pefindo | - | - |
| Sukuk Mudharabah PT Indah Kiat Pulp and Paper Tbk | idA+(sy) | Pefindo | - | - |
| Sukuk Mudharabah PT Lontar Papyrus Pulp & Paper Industry | idA(sy) | Pefindo | - | - |

| Penerbit/ *Issuer* | 2024 Peringkat/ *Rating* | 2024 Pemeringkat/ *Rater* | 2023 Peringkat/ *Rating* | 2023 Pemeringkat/ *Rater* |
|---|---|---|---|---|
| Sukuk Mudharabah PT Wijaya Karya Tbk | idBB- | Pefindo | idCCC | Pefindo |
| Sukuk Mudharabah PT Hutama Karya (Persero) | idAA- | Pefindo | idAA- | Pefindo |
| Sukuk Wakalah Bi Al-Istitsmar CIMB Niaga Auto Finance | AA+(idn) | Fitch | AA+(idn) | Fitch |
| Solar United Network Pte.Ltd | irBBB+ | KRI | irBBB+ | KRI |
| Goldman Sachs Group Inc | A | Fitch | A | Fitch |
| Medco Oak Tree Pte Ltd | BB-(idn) | Fitch | B+(idn) | Fitch |
| PT Bussan Auto Finance | - | - | idAAA | Pefindo |
| PT Mandiri Tunas Finance | - | - | idAAA | Pefindo |
| PT Maybank Indonesia Finance | - | - | idAAA | Pefindo |
| Sukuk Ijarah PT Perusahaan Listrik Negara | - | - | idAAA(sy) | Pefindo |

f. Kolektibilitas efek-efek sesuai Peraturan Otoritas Jasa Keuangan diungkapkan pada Catatan 50d.

f. Collectibility marketable securities in accordance with Financial Services Authority Regulation are disclosed in Note 50d.

g. Perubahan cadangan kerugian penurunan nilai efek-efek adalah sebagai berikut:

g. The changes in allowance for impairment losses on securities are as follows:

| | 2024 Tahap 1/ *Stage 1* | 2024 Tahap 2/ *Stage 2* | 2024 Tahap 3/ *Stage 3* | 2024 Jumlah/ *Total* | |
|---|---|---|---|---|---|
| Saldo awal tahun | 269 | - | - | 269 | Balance at the beginning of the year |
| Pemulihan tahun berjalan | (24) | - | - | (24) | Reversal of current year |
| **Saldo akhir tahun** | **245** | **-** | **-** | **245** | **Balance at the end of the year** |

| | 2023 Tahap 1/ *Stage 1* | 2023 Tahap 2/ *Stage 2* | 2023 Tahap 3/ *Stage 3* | 2023 Jumlah/ *Total* | |
|---|---|---|---|---|---|
| Saldo awal tahun | 498 | - | - | 498 | Balance at the beginning of the year |
| Pemulihan tahun berjalan | (229) | - | - | (229) | Reversal of current year |
| **Saldo akhir tahun** | **269** | **-** | **-** | **269** | **Balance at the end of the year** |

Manajemen berpendapat bahwa cadangan kerugian untuk penurunan nilai yang dibentuk pada tanggal 31 Desember 2024 dan 2023 adalah cukup untuk menutup kemungkinan kerugian yang timbul.

Management believes that the allowance for impairment losses as of December 31, 2024 and 2023 is adequate to cover possible losses that may be incurred.

h. Tidak terdapat penghapusan efek-efek selama tahun-tahun yang berakhir 31 Desember 2024 dan 2023.

h. There are no securities written-off for the years ended December 31, 2024 and 2023.

## 8. Efek yang Dibeli dengan Janji Jual Kembali - Pihak Ketiga

Pada tanggal 31 Desember 2024, efek-efek yang dibeli dengan janji jual kembali adalah sebagai berikut:

## 8. Securities Purchased under Agreement to Resell - Third Parties

As of December 31, 2024, securities purchased under agreement to resell are:

| 2024 | | | | | | |
|---|---|---|---|---|---|---|
| Pihak Lawan/ *Counterparty* | Jenis/ *Type* | Jangka waktu/ *Term* | Tanggal jatuh tempo/ *Due Date* | Nilai nominal/ *Nominal value* | Biaya diterima dimuka yang belum direalisasi/ *Unamortized interest received* | Nilai bersih/ *Net Value* |
| Rupiah | | | | | | |
| BI | VR0059 | 90 hari/*days* | 26 Februari/*February 26,* 2025 | 24.143 | (244) | 23.899 |
| BI | VR0034 | 91 hari/*days* | 25 Maret/*March 25,* 2025 | 25.119 | (393) | 24.726 |
| BI | VR0034 | 91 hari/*days* | 25 Maret/*March 25,* 2025 | 25.122 | (396) | 24.726 |
| BI | VR0034 | 91 hari/*days* | 25 Maret/*March 25,* 2025 | 25.125 | (398) | 24.727 |
| Bank CCIB | IDSR141125364S | 14 hari/*days* | 7 Januari/*January 7,* 2025 | 94.239 | (102) | 94.137 |
| **Jumlah/*Total*** | | | | **193.748** | **(1.533)** | **192.215** |

Manajemen berpendapat bahwa tidak terdapat penurunan nilai atas efek yang dibeli dengan janji jual kembali pada tanggal 31 Desember 2024.

Management believes that there is no impairment in the value of securities purchased under agreement to resell as of December 31, 2024.

## 9. Kredit yang Diberikan dan Piutang/ Pembiayaan Syariah

a. Jenis Kredit dan Piutang/Pembiayaan Syariah

## 9. Loans and Receivables/Sharia Financing

a. By Types of Loans and Receivables/Sharia Financing

| 2024 | | | | | | |
|---|---|---|---|---|---|---|
| | **Tahap 1/ *Stage 1*** | **Tahap 2/ *Stage 2*** | **Tahap 3/ *Stage 3*** | **Syariah/ *Sharia*** | **Jumlah/ *Total*** | |
| Pihak berelasi (Catatan 37) | | | | | | Related parties (Note 37) |
| Rupiah | | | | | | Rupiah |
| Pinjaman tetap | 212.828 | - | - | - | 212.828 | Fixed loans |
| Pinjaman karyawan | 69.241 | - | - | - | 69.241 | Loans to employees |
| Pinjaman konsumsi | 7.068 | - | - | - | 7.068 | Consumer loans |
| Piutang syariah - ijarah multijasa | - | - | - | 187 | 187 | Sharia receivable - ijarah multijasa |
| Piutang syariah - qardh | - | - | - | 23 | 23 | Sharia receivables - qardh |
| Jumlah | 289.137 | - | - | 210 | 289.347 | Total |
| Mata uang asing (Catatan 39) | | | | | | Foreign currencies (Note 39) |
| Pinjaman tetap | 8.048 | - | - | - | 8.048 | Fixed loans |
| Jumlah - pihak berelasi | 297.185 | - | - | 210 | 297.395 | Total - related parties |
| Pihak ketiga | | | | | | Third parties |
| Rupiah | | | | | | Rupiah |
| Pinjaman cicilan | 2.523.250 | 501.592 | 153.692 | - | 3.178.534 | Installment loans |
| Piutang syariah - musyarakah | - | - | - | 2.375.665 | 2.375.665 | Sharia receivables - musyarakah |
| Pinjaman tetap | 4.506.988 | 8.965 | - | - | 4.515.953 | Fixed loans |
| Pinjaman konsumsi | 2.152.332 | 179.980 | 56.360 | - | 2.388.672 | Consumer loans |
| Piutang syariah - murabahah | - | - | - | 335.423 | 335.423 | Sharia receivables - murabahah |
| Piutang syariah - mudharabah | - | - | - | 312.192 | 312.192 | Sharia receivables - mudharabah |
| Pinjaman rekening koran | 343.515 | 283 | - | - | 343.798 | Overdraft |
| Piutang syariah - qardh | - | - | - | 13.676 | 13.676 | Sharia receivables - qardh |
| Pinjaman karyawan | 51.115 | 146 | 370 | - | 51.631 | Loans to employees |
| Piutang syariah - ijarah multijasa | - | - | - | 136.704 | 136.704 | Sharia receivable - ijarah multijasa |
| Piutang syariah - ijarah | - | - | - | 209 | 209 | Sharia receivables - ijarah |
| Jumlah | 9.577.200 | 690.966 | 210.422 | 3.173.869 | 13.652.457 | Total |
| Mata uang asing (Catatan 39) | | | | | | Foreign currencies (Note 39) |
| Pinjaman cicilan | 378.849 | - | - | - | 378.849 | Installment loans |
| Pinjaman tetap | 27.102 | - | - | - | 27.102 | Fixed loans |
| Jumlah | 405.951 | - | - | - | 405.951 | Total |
| Jumlah - pihak ketiga | 9.983.151 | 690.966 | 210.422 | 3.173.869 | 14.058.408 | Total - third parties |
| Jumlah | 10.280.336 | 690.966 | 210.422 | 3.174.079 | 14.355.803 | Total |
| Cadangan kerugian penurunan nilai | (295.945) | (310.066) | (168.027) | (775.478) | (1.549.516) | Allowance for impairment losses |
| **Jumlah - bersih** | **9.984.391** | **380.900** | **42.395** | **2.398.601** | **12.806.287** | **Net** |

| | 2023 | | | | | |
|---|---|---|---|---|---|---|
| | Tahap 1/ *Stage 1* | Tahap 2/ *Stage 2* | Tahap 3/ *Stage 3* | Syariah/ *Sharia* | Jumlah/ *Total* | |
| Pihak berelasi (Catatan 37) | | | | | | Related parties (Note 37) |
| Rupiah | | | | | | Rupiah |
| Pinjaman tetap | 131.902 | - | - | - | 131.902 | Fixed loans |
| Pinjaman karyawan | 62.398 | - | - | - | 62.398 | Loans to employees |
| Pinjaman konsumsi | 8.973 | - | - | - | 8.973 | Consumer loans |
| Piutang syariah - qardh | - | - | - | 67 | 67 | Sharia receivables - qardh |
| Jumlah | 203.273 | - | - | 67 | 203.340 | Total |
| Mata uang asing (Catatan 39) | | | | | | Foreign currencies (Note 39) |
| Pinjaman tetap | 7.699 | - | - | - | 7.699 | Fixed loans |
| Jumlah - pihak berelasi | 210.972 | - | - | 67 | 211.039 | Total - related parties |
| Pihak ketiga | | | | | | Third parties |
| Rupiah | | | | | | Rupiah |
| Pinjaman cicilan | 3.128.438 | 814.208 | 33.498 | - | 3.976.144 | Installment loans |
| Piutang syariah - musyarakah | - | - | - | 3.936.659 | 3.936.659 | Sharia receivables - musyarakah |
| Pinjaman tetap | 3.646.949 | 9.991 | - | - | 3.656.940 | Fixed loans |
| Pinjaman konsumsi | 2.677.752 | 321.630 | 76.248 | - | 3.075.630 | Consumer loans |
| Piutang syariah - murabahah | - | - | - | 377.007 | 377.007 | Sharia receivables - murabahah |
| Piutang syariah - mudharabah | - | - | - | 679.725 | 679.725 | Sharia receivables - mudharabah |
| Pinjaman rekening koran | 218.699 | - | - | - | 218.699 | Overdraft |
| Piutang syariah - qardh | - | - | - | 171.840 | 171.840 | Sharia receivables - qardh |
| Pinjaman karyawan | 42.119 | 61 | 668 | - | 42.848 | Loans to employees |
| Piutang syariah - ijarah | - | - | - | 2.188 | 2.188 | Sharia receivables - ijarah |
| Jumlah | 9.713.957 | 1.145.890 | 110.414 | 5.167.419 | 16.137.680 | Total |
| Mata uang asing (Catatan 39) | | | | | | Foreign currencies (Note 39) |
| Pinjaman cicilan | 450.868 | - | - | - | 450.868 | Installment loans |
| Pinjaman tetap | 71.859 | - | - | - | 71.859 | Fixed loans |
| Jumlah | 522.727 | - | - | - | 522.727 | Total |
| Jumlah - pihak ketiga | 10.236.684 | 1.145.890 | 110.414 | 5.167.419 | 16.660.407 | Total - third parties |
| Jumlah | 10.447.656 | 1.145.890 | 110.414 | 5.167.486 | 16.871.446 | Total |
| Cadangan kerugian penurunan nilai | (347.689) | (347.364) | (53.952) | (937.241) | (1.686.246) | Allowance for impairment losses |
| **Jumlah - bersih** | **10.099.967** | **798.526** | **56.462** | **4.230.245** | **15.185.200** | **Net** |

b. Sektor Ekonomi dan Kolektibilitas

Kredit dan piutang/pembiayaan syariah berdasarkan sektor ekonomi dan kolektibilitas adalah sebagai berikut:

b. By Economic Sectors and Collectibility

Loans and receivables/sharia financing based on economic sectors and collectability are as follow:

| | 2024 | | | | | |
|---|---|---|---|---|---|---|
| Jenis | Tahap 1/ *Stage 1* | Tahap 2/ *Stage 2* | Tahap 3/ *Stage 3* | Syariah/ *Sharia* | Jumlah/ *Total* | Types of Loans |
| Rupiah | | | | | | Rupiah |
| Perdagangan besar dan eceran, reparasi, dan perawatan mobil, dan sepeda motor | 4.295.201 | 442.011 | 146.887 | 2.548.125 | 7.432.224 | Wholesale and retail trade, repair, and maintenance of cars, and motorcycles |
| Rumah tangga | 2.198.778 | 176.515 | 53.871 | 4.695 | 2.433.859 | Household |
| Aktivitas keuangan dan asuransi | 980.310 | - | 60 | - | 980.370 | Financial and insurance activities |
| Pertambangan dan penggalian | 678.002 | - | - | - | 678.002 | Mining and excavation |
| Konstruksi | 283.269 | 2.530 | - | 205.241 | 491.040 | Construction |
| Pertanian, kehutanan dan perikanan | 359.743 | 18.255 | 3.200 | 30.337 | 411.535 | Agriculture, hunting and forestry |
| Real estate | 284.970 | 258 | - | 99.933 | 385.161 | Real estate |
| Industri pengolahan | 259.144 | 10.705 | 3.786 | 55.997 | 329.632 | Processing industries |
| Bukan lapangan usaha lainnya | 44.460 | 18 | 89 | 148.938 | 193.505 | Not other business fields |
| Pengangkutan dan pergudangan | 139.305 | 9.845 | 556 | 5.959 | 155.665 | Transport and warehousing |
| Penyediaan akomodasi dan penyediaan makan minum | 88.989 | 17.831 | 520 | 29.744 | 137.084 | Accommodation and food and beverage |
| Aktivitas kesehatan manusia dan aktivitas sosial | 75.488 | 1.764 | - | 15.365 | 92.617 | Human health activities and social activities |
| Aktivitas penyewaan dan sewa guna usaha tanpa hak opsi, ketenagakerjaan, agen perjalanan dan penunjang usaha lainnya | 57.822 | 1.571 | 1.066 | 16.895 | 77.354 | Leasing and leasing activities without option rights, employment, travel agent and other business support |
| Aktivitas profesional, ilmiah, dan teknis | 57.504 | - | 32 | 556 | 58.092 | Professional, scientific and technical activity |
| Aktivitas jasa lainnya | 33.431 | 6.327 | 245 | 3.076 | 43.079 | Other service activities |
| Jasa pendidikan | 12.693 | - | - | 6.516 | 19.209 | Education services |
| Kesenian, hiburan dan rekreasi | 5.884 | 304 | - | 2.572 | 8.760 | Arts, entertainment and recreation |
| Pengelolaan air, pengelolaan air limbah, pengelolaan dan daur ulang sampah, dan aktivitas remediasi | 4.452 | 3.032 | - | - | 7.484 | Water management, waste water management, waste management and recycling, and remediation activities |
| Pengadaan listrik, gas, uap/air panas dan udara dingin | 4.434 | - | - | - | 4.434 | Supply of electricity, gas, steam/water hot and cold air |
| Informasi dan komunikasi | 2.458 | - | 110 | 130 | 2.698 | Information and communication |
| Jumlah | 9.866.337 | 690.966 | 210.422 | 3.174.079 | 13.941.804 | Subtotal |
| Mata uang asing (Catatan 39) | | | | | | Foreign currencies (Note 39) |
| Industri pengolahan | 247.260 | - | - | - | 247.260 | Processing industries |
| Pertambangan dan penggalian | 158.691 | - | - | - | 158.691 | Mining and excavation |
| Rumah tangga | 8.048 | - | - | - | 8.048 | Household |
| Jumlah | 413.999 | - | - | - | 413.999 | Subtotal |
| Jumlah | 10.280.336 | 690.966 | 210.422 | 3.174.079 | 14.355.803 | Total |
| Cadangan kerugian penurunan nilai | (295.945) | (310.066) | (168.027) | (775.478) | (1.549.516) | Allowance for impairment losses |
| **Jumlah - bersih** | **9.984.391** | **380.900** | **42.395** | **2.398.601** | **12.806.287** | **Net** |

| Jenis | 2023 Tahap 1/ *Stage 1* | Tahap 2/ *Stage 2* | Tahap 3/ *Stage 3* | Syariah/ *Sharia* | Jumlah/ *Total* | Types of Loans |
|---|---|---|---|---|---|---|
| Rupiah | | | | | | Rupiah |
| Perdagangan besar dan eceran, reparasi, dan perawatan mobil, dan sepeda motor | 3.341.911 | 507.005 | 21.314 | 4.574.150 | 8.444.380 | Wholesale and retail trade, repair, and maintenance of cars, and motorcycles |
| Rumah tangga | 2.721.848 | 313.574 | 72.304 | 354 | 3.108.080 | Household |
| Aktivitas keuangan dan asuransi | 1.092.753 | - | 166 | 657 | 1.093.576 | Financial and insurance activities |
| Pertambangan dan penggalian | 780.252 | 147 | - | - | 780.399 | Mining and excavation |
| Informasi dan komunikasi | 436.429 | 267.462 | 2.354 | 179 | 706.424 | Information and communication |
| Real estate | 508.732 | 279 | - | 112.610 | 621.621 | Real estate |
| Pertanian, kehutanan dan perikanan | 328.557 | 12.672 | 3.049 | 242.310 | 586.588 | Agriculture, hunting and forestry |
| Industri pengolahan | 251.053 | 15.139 | 3.961 | 16.217 | 286.370 | Processing industries |
| Aktivitas kesehatan manusia dan aktivitas sosial | 4.339 | 285 | - | 149.155 | 153.779 | Human health activities and social activities |
| Konstruksi | 103.329 | 1.967 | 737 | 5.279 | 111.312 | Construction |
| Penyediaan akomodasi dan penyediaan makan minum | 81.915 | 7.582 | 4.169 | 11.019 | 104.685 | Accommodation and food and beverage |
| Pengangkutan dan pergudangan | 83.103 | 17.416 | 389 | 2.116 | 103.024 | Transport and warehousing |
| Aktivitas penyewaan dan sewa guna usaha tanpa hak opsi, ketenagakerjaan, agen perjalanan dan penunjang usaha lainnya | 67.088 | 1.006 | 636 | 19.605 | 88.335 | Leasing and leasing activities without option rights, employment, travel agent and other business support |
| Bukan lapangan usaha lainnya | 44.850 | 306 | 42 | 25.576 | 70.774 | Not other business fields |
| Aktivitas profesional, ilmiah, dan teknis | 35.485 | - | 57 | 769 | 36.311 | Professional, scientific and technical activity |
| Aktivitas jasa lainnya | 14.755 | 819 | 1.200 | 3.376 | 20.150 | Other service activities |
| Jasa pendidikan | 12.906 | - | 36 | 1.936 | 14.878 | Education services |
| Kesenian, hiburan dan rekreasi | 2.314 | 25 | - | 2.105 | 4.444 | Arts, entertainment and recreation |
| Pengadaan listrik, gas, uap/air panas dan udara dingin | 3.041 | - | - | 59 | 3.100 | Supply of electricity, gas, steam/water hot and cold air |
| Pengelolaan air, pengelolaan air limbah, pengelolaan dan daur ulang sampah, dan aktivitas remediasi | 2.570 | 206 | - | 14 | 2.790 | Water management, waste water management, waste management and recycling, and remediation activities |
| Jumlah | 9.917.230 | 1.145.890 | 110.414 | 5.167.486 | 16.341.020 | Subtotal |
| Mata uang asing (Catatan 39) | | | | | | Foreign currencies (Note 39) |
| Industri pengolahan | 291.657 | - | - | - | 291.657 | Processing industries |
| Pertambangan dan penggalian | 231.070 | - | - | - | 231.070 | Mining and excavation |
| Rumah tangga | 7.699 | - | - | - | 7.699 | Household |
| Jumlah | 530.426 | - | - | - | 530.426 | Subtotal |
| Jumlah | 10.447.656 | 1.145.890 | 110.414 | 5.167.486 | 16.871.446 | Total |
| Cadangan kerugian penurunan nilai | (347.689) | (347.364) | (53.952) | (937.241) | (1.686.246) | Allowance for impairment losses |
| **Jumlah - bersih** | **10.099.967** | **798.526** | **56.462** | **4.230.245** | **15.185.200** | **Net** |

Kredit dan piutang/pembiayaan syariah berdasarkan kolektibilitas:

Loans and receivables/sharia financing based on collectibility:

| Jenis | 2024 Lancar/ *Current* | Dalam Perhatian Khusus/ *Special Mention* | Kurang Lancar/ *Substandard* | Diragukan/ *Doubtful* | Macet/ *Loss* | Jumlah/ *Total* | Types of Loans |
|---|---|---|---|---|---|---|---|
| Pihak berelasi (Catatan 37) | | | | | | | Related parties (Note 37) |
| Rupiah | | | | | | | Rupiah |
| Rumah tangga | 69.777 | - | - | - | - | 69.777 | Household |
| Aktivitas keuangan dan asuransi | 199.924 | - | - | - | - | 199.924 | Financial and insurance activities |
| Perdagangan besar dan eceran, reparasi dan perawatan mobil dan sepeda motor | 12.904 | - | - | - | - | 12.904 | Wholesale and retail trade, repair, and maintenance of cars, and motorcycles |
| Bukan lapangan usaha lainnya | 6.669 | - | - | - | - | 6.669 | Not other business fields |
| Aktivitas jasa lainnya | 73 | - | - | - | - | 73 | Other service activities |
| Jumlah | 289.347 | - | - | - | - | 289.347 | Subtotal |
| Mata uang asing (Catatan 39) | | | | | | | Foreign currency (Note 39) |
| Rumah tangga | 8.048 | - | - | - | - | 8.048 | Household |
| Jumlah - pihak berelasi | 297.395 | - | - | - | - | 297.395 | Total - related parties |
| Pihak ketiga | | | | | | | Third Parties |
| Rupiah | | | | | | | Rupiah |
| Perdagangan besar dan eceran, reparasi dan perawatan mobil dan sepeda motor | 6.544.099 | 726.408 | 4.115 | 3.568 | 141.130 | 7.419.320 | Wholesale and retail trade, repair, and maintenance of cars, and motorcycles |
| Rumah tangga | 1.865.236 | 444.975 | 20.156 | 16.357 | 17.358 | 2.364.082 | Household |
| Aktivitas keuangan dan asuransi | 780.038 | 348 | - | - | 60 | 780.446 | Financial and insurance activities |
| Pertambangan dan penggalian | 678.002 | - | - | - | - | 678.002 | Mining and excavation |
| Konstruksi | 489.333 | 1.707 | - | - | - | 491.040 | Construction |
| Pertanian, kehutanan dan perikanan | 405.011 | 3.199 | 166 | 1.143 | 2.016 | 411.535 | Agriculture, hunting and forestry |
| Real estate | 384.903 | 258 | - | - | - | 385.161 | Real estate |
| Industri pengolahan | 317.659 | 8.187 | 334 | 293 | 3.159 | 329.632 | Processing industries |
| Bukan lapangan usaha lainnya | 152.880 | 28.950 | 2.153 | 816 | 2.037 | 186.836 | Not other business fields |
| Pengangkutan dan pergudangan | 154.763 | 342 | - | 179 | 381 | 155.665 | Transport and warehousing |
| Penyediaan akomodasi dan penyediaan makan minum | 134.214 | 2.072 | 250 | 3 | 545 | 137.084 | Accommodation and food and beverage |
| Aktivitas kesehatan manusia dan aktivitas sosial | 91.596 | 1.012 | - | 6 | 3 | 92.617 | Human health activities and social activities |
| Aktivitas penyewaan dan sewa guna usaha tanpa hak opsi, ketenagakerjaan, agen perjalanan dan penunjang usaha lainnya | 74.625 | 1.663 | 334 | 216 | 516 | 77.354 | Leasing and leasing activities without option rights, employment, travel agent and other business support |
| Aktivitas profesional, ilmiah, dan teknis | 58.060 | - | - | - | 32 | 58.092 | Professional, scientific and technical activity |
| Aktivitas jasa lainnya | 38.522 | 4.240 | - | - | 244 | 43.006 | Other service activities |
| Jasa pendidikan | 16.203 | 3.006 | - | - | - | 19.209 | Education services |
| Kesenian, hiburan dan rekreasi | 8.760 | - | - | - | - | 8.760 | Arts, entertainment and recreation |
| Pengelolaan air, pengelolaan air limbah, pengelolaan dan daur ulang sampah, dan aktivitas remediasi | 7.484 | - | - | - | - | 7.484 | Water management, waste water management, waste management and recycling, and remediation activities |
| Pengadaan listrik, gas, uap/air panas dan udara dingin | 4.434 | - | - | - | - | 4.434 | Supply of electricity, gas, steam/water hot and cold air |
| Informasi dan komunikasi | 2.588 | - | - | - | 110 | 2.698 | Information and communication |
| Jumlah | 12.208.410 | 1.226.367 | 27.508 | 22.581 | 167.591 | 13.652.457 | Subtotal |

| Jenis | 2024 Lancar/ *Current* | Dalam Perhatian Khusus/ *Special Mention* | Kurang Lancar/ *Substandard* | Diragukan/ *Doubtful* | Macet/ *Loss* | Jumlah/ *Total* | Types of Loans |
|---|---|---|---|---|---|---|---|
| Pihak ketiga | | | | | | | Third Parties |
| Mata uang asing (Catatan 39) | | | | | | | Foreign currency (Note 39) |
| Industri pengolahan | 187.709 | 59.551 | - | - | - | 247.260 | Processing industries |
| Pertambangan dan penggalian | 158.691 | - | - | - | - | 158.691 | Mining and excavation |
| Jumlah | 346.400 | 59.551 | - | - | - | 405.951 | Subtotal |
| Jumlah - pihak ketiga | 12.554.810 | 1.285.918 | 27.508 | 22.581 | 167.591 | 14.058.408 | Total - third parties |
| Jumlah | 12.852.205 | 1.285.918 | 27.508 | 22.581 | 167.591 | 14.355.803 | Total |
| Cadangan kerugian penurunan nilai | (689.307) | (685.786) | (13.857) | (11.141) | (149.425) | (1.549.516) | Allowance for impairment losses |
| **Jumlah - bersih** | **12.162.898** | **600.132** | **13.651** | **11.440** | **18.166** | **12.806.287** | **Net** |

| Jenis | 2023 Lancar/ *Current* | Dalam Perhatian Khusus/ *Special Mention* | Kurang Lancar/ *Substandard* | Diragukan/ *Doubtful* | Macet/ *Loss* | Jumlah/ *Total* | Types of Loans |
|---|---|---|---|---|---|---|---|
| Pihak berelasi (Catatan 37) | | | | | | | Related parties (Note 37) |
| Rupiah | | | | | | | Rupiah |
| Aktivitas keuangan dan asuransi | 114.889 | - | - | - | - | 114.889 | Financial and insurance activities |
| Rumah tangga | 62.920 | - | - | - | - | 62.920 | Household |
| Perdagangan besar dan eceran, reparasi dan perawatan mobil dan sepeda motor | 17.013 | - | - | - | - | 17.013 | Wholesale and retail trade, repair, and maintenance of cars, and motorcycles |
| Bukan lapangan usaha lainnya | 8.518 | - | - | - | - | 8.518 | Not other business fields |
| Jumlah | 203.340 | - | - | - | - | 203.340 | Subtotal |
| Mata uang asing (Catatan 39) | | | | | | | Foreign currency (Note 39) |
| Rumah tangga | 7.699 | - | - | - | - | 7.699 | Household |
| Jumlah - pihak berelasi | 211.039 | - | - | - | - | 211.039 | Total - related parties |
| Pihak ketiga | | | | | | | Third Parties |
| Rupiah | | | | | | | Rupiah |
| Perdagangan besar dan eceran, reparasi dan perawatan mobil dan sepeda motor | 7.612.726 | 792.573 | 3.031 | 3.834 | 15.203 | 8.427.367 | Wholesale and retail trade, repair, and maintenance of cars, and motorcycles |
| Rumah tangga | 2.039.953 | 932.892 | 46.881 | 14.242 | 11.192 | 3.045.160 | Household |
| Aktivitas keuangan dan asuransi | 978.521 | - | - | - | 166 | 978.687 | Financial and insurance activities |
| Pertambangan dan penggalian | 780.252 | 147 | - | - | - | 780.399 | Mining and excavation |
| Informasi dan komunikasi | 704.069 | - | - | - | 2.355 | 706.424 | Information and communication |
| Real estate | 621.342 | 279 | - | - | - | 621.621 | Real estate |
| Pertanian, kehutanan dan perikanan | 577.029 | 6.497 | 43 | 913 | 2.106 | 586.588 | Agriculture, hunting and forestry |
| Industri pengolahan | 271.134 | 11.275 | 435 | 437 | 3.089 | 286.370 | Processing industries |
| Aktivitas kesehatan manusia dan aktivitas sosial | 5.706 | 100 | 4 | - | 147.969 | 153.779 | Human health activities and social activities |
| Penyediaan akomodasi dan penyediaan makan minum | 89.104 | 11.277 | 3.046 | 547 | 711 | 104.685 | Accommodation and food and beverage |
| Pengangkutan dan pergudangan | 102.366 | 265 | - | 389 | 4 | 103.024 | Transport and warehousing |
| Konstruksi | 108.939 | 1.636 | 168 | 252 | 317 | 111.312 | Construction |
| Aktivitas penyewaan dan sewa guna usaha tanpa hak opsi, ketenagakerjaan, agen perjalanan dan penunjang usaha lainnya | 85.882 | 1.817 | 427 | - | 209 | 88.335 | Leasing and leasing activities without option rights, employment, travel agent and other business support |
| Bukan lapangan usaha lainnya | 55.429 | 6.100 | 391 | 143 | 193 | 62.256 | Not other business fields |
| Aktivitas profesional, ilmiah, dan teknis | 36.254 | - | - | - | 57 | 36.311 | Professional, scientific and technical activity |
| Aktivitas jasa lainnya | 18.426 | 524 | 873 | 16 | 311 | 20.150 | Other service activities |
| Jasa pendidikan | 14.837 | 5 | - | - | 36 | 14.878 | Education services |
| Kesenian, hiburan dan rekreasi | 4.443 | 1 | - | - | - | 4.444 | Arts, entertainment and recreation |
| Pengadaan listrik, gas, uap/air panas dan udara dingin | 3.100 | - | - | - | - | 3.100 | Supply of electricity, gas, steam/water hot and cold air |
| Pengelolaan air, pengelolaan air limbah, pengelolaan dan daur ulang sampah, dan aktivitas remediasi | 2.776 | - | - | - | 14 | 2.790 | Water management, waste water management, waste management and recycling, and remediation activities |
| Jumlah | 14.112.288 | 1.765.388 | 55.299 | 20.773 | 183.932 | 16.137.680 | Subtotal |
| Mata uang asing (Catatan 39) | | | | | | | Foreign currency (Note 39) |
| Industri pengolahan | 225.450 | 66.207 | - | - | - | 291.657 | Processing industries |
| Pertambangan dan penggalian | 231.070 | - | - | - | - | 231.070 | Mining and excavation |
| Jumlah | 456.520 | 66.207 | - | - | - | 522.727 | Subtotal |
| Jumlah - pihak ketiga | 14.568.808 | 1.831.595 | 55.299 | 20.773 | 183.932 | 16.660.407 | Total - third parties |
| Jumlah | 14.779.847 | 1.831.595 | 55.299 | 20.773 | 183.932 | 16.871.446 | Total |
| Cadangan kerugian penurunan nilai | (786.982) | (696.858) | (25.782) | (10.057) | (166.567) | (1.686.246) | Allowance for impairment losses |
| **Jumlah - bersih** | **13.992.865** | **1.134.737** | **29.517** | **10.716** | **17.365** | **15.185.200** | **Net** |

c. Jangka Waktu

Jangka waktu kredit dan piutang/ pembiayaan syariah diklasifikasikan berdasarkan periode sebagaimana yang tercantum dalam perjanjian dan waktu yang tersisa sampai dengan saat jatuh temponya:

c. By Maturity

The classifications of loans and receivables/sharia financing based on contractual maturity, as stated in the agreements, and based on remaining maturity are as follows:

Berdasarkan Periode Perjanjian Kredit: / Based on Contractual Maturity:

| | 2024 | 2023 | |
|---|---|---|---|
| Rupiah | | | Rupiah |
| Kurang dari atau sama dengan 1 tahun | 3.512.929 | 1.981.350 | 1 year or less |
| Lebih dari 1 - 2 tahun | 3.377.030 | 5.253.216 | More than 1 year until 2 years |
| Lebih dari 2 - 5 tahun | 3.968.235 | 4.985.425 | More than 2 years until 5 years |
| Lebih dari 5 tahun | 3.083.610 | 4.121.029 | More than 5 years |
| Jumlah | 13.941.804 | 16.341.020 | Subtotal |
| Mata uang asing (Catatan 39) | | | Foreign currencies (Note 39) |
| Kurang dari atau sama dengan 1 tahun | 4.569 | 170 | 1 year or less |
| Lebih dari 1 - 2 tahun | 30.581 | 33.123 | More than 1 year until 2 years |
| Lebih dari 2 - 5 tahun | 218.242 | 277.335 | More than 2 years until 5 years |
| Lebih dari 5 tahun | 160.607 | 219.798 | More than 5 years |
| Jumlah | 413.999 | 530.426 | Subtotal |
| Jumlah | 14.355.803 | 16.871.446 | Total |
| Cadangan kerugian penurunan nilai | (1.549.516) | (1.686.246) | Allowance for impairment losses |
| **Jumlah - bersih** | **12.806.287** | **15.185.200** | **Net** |

Berdasarkan Sisa Umur Jatuh Tempo: / Based on Remaining Period until Maturity:

| | 2024 | 2023 | |
|---|---|---|---|
| Rupiah | | | Rupiah |
| Kurang dari atau sama dengan 1 tahun | 7.578.049 | 6.362.940 | 1 year or less |
| Lebih dari 1 - 2 tahun | 1.516.774 | 4.061.958 | More than 1 year until 2 years |
| Lebih dari 2 - 5 tahun | 3.882.157 | 3.299.418 | More than 2 years until 5 years |
| Lebih dari 5 tahun | 964.824 | 2.616.704 | More than 5 years |
| Jumlah | 13.941.804 | 16.341.020 | Subtotal |
| Mata uang asing (Catatan 39) | | | Foreign currencies (Note 39) |
| Kurang dari atau sama dengan 1 tahun | 12.616 | 33.293 | 1 year or less |
| Lebih dari 1 - 2 tahun | 181.224 | 46.265 | More than 1 year until 2 years |
| Lebih dari 2 - 5 tahun | 59.552 | 231.070 | More than 2 years until 5 years |
| Lebih dari 5 tahun | 160.607 | 219.798 | More than 5 years |
| Jumlah | 413.999 | 530.426 | Subtotal |
| Jumlah | 14.355.803 | 16.871.446 | Total |
| Cadangan kerugian penurunan nilai | (1.549.516) | (1.686.246) | Allowance for impairment losses |
| **Jumlah - bersih** | **12.806.287** | **15.185.200** | **Net** |

d. Suku bunga/bagi hasil per tahun atas kredit diberikan dan piutang/pembiayaan syariah adalah sebagai berikut:

d. Interest rates/profit sharing per annum on loans and receivables/sharia financing are as follows:

| | 2024 | 2023 | |
|---|---|---|---|
| | % | % | |
| Rupiah | 0,00 - 37,42 | 0,00 - 37,42 | Rupiah |
| Dolar Amerika Serikat | 0,95 - 10,00 | 0,95 - 10,00 | United States Dollar |

e. Jumlah kredit yang dijamin dengan jaminan tunai pada tanggal 31 Desember 2024 dan 2023 masing-masing sebesar Rp470.681 dan Rp226.687.

e. Loans collateralized by cash collateral as of December 31, 2024 and 2023 amounted to Rp470,681 and Rp226,687, respectively.

f. Saldo kredit channeling pada tanggal 31 Desember 2024 dan 2023 masing-masing adalah sebesar Rp166.800 dan Rp54.605, dimana sebesar Rp156.719 dan Rp38.965 dari saldo kredit channeling disalurkan melalui pihak berelasi (Catatan 37).

f. The balance of the loan channeling credit as of December 31, 2024 and 2023, amounted to Rp166,800 and Rp54,605 respectively, of which Rp156,719 and Rp38,965 from the credit balance of joint financing is channeled through Related Parties (Note 37).

g. Saldo kredit joint financing pada tanggal 31 Desember 2024 dan 2023 masing-masing adalah sebesar Rp2.043.036 dan Rp2.862.913, dimana sebesar Rp1.796.958 dan Rp2.586.684 dari saldo kredit joint financing disalurkan melalui pihak berelasi (Catatan 37).

h. Kredit yang diberikan kepada karyawan merupakan kredit untuk membeli kendaraan, rumah dan keperluan lainnya yang dibebani bunga 0%-12% untuk kredit dibawah 1 tahun dan 0%-24,43% untuk kredit antara 1 sampai dengan 10 tahun.

i. Kredit yang direstrukturisasi sesuai dengan Peraturan Otoritas Jasa Keuangan diungkapkan pada Catatan 50e.

j. Saldo kredit dan piutang/pembiayaan syariah pada tanggal 31 Desember 2024 dan 2023 berdasarkan klasifikasi kolektibilitas adalah sebagai berikut:

g. The balance of the joint financing credit as of December 31, 2024 and 2023 amounted to Rp2,043,036 and Rp2,862,913, respectively, of which Rp1,796,958 and Rp2,586,684 from the credit balance of joint financing is channeled through related parties (Note 37).

h. Loans to employees represent distributed loans for purchases of cars, houses and other necessities with 0%-12% interest rate for loans with term below 1 year and 0%-24.43% per annum for loan with terms ranging between 1 to 10 years.

i. Restructured loans in accordance with the Financial Services Authority Regulation are disclosed in Note 50e.

j. The collectibility classification of loans and receivables/sharia financing as of December 31, 2024 and 2023 follows:

| | 2024 | | | | | | |
|---|---|---|---|---|---|---|---|
| **Jenis** | **Lancar/ *Current*** | **Dalam Perhatian Khusus/ *Special Mention*** | **Kurang Lancar/ *Substandard*** | **Diragukan/ *Doubtful*** | **Macet/ *Loss*** | **Jumlah/ *Total*** | **Types of Loans** |
| Rupiah | | | | | | | Rupiah |
| Pihak berelasi (Catatan 37) | 289.347 | - | - | - | - | 289.347 | Related parties (Note 37) |
| Pihak ketiga | 12.208.410 | 1.226.367 | 27.508 | 22.581 | 167.591 | 13.652.457 | Third parties |
| Jumlah | 12.497.757 | 1.226.367 | 27.508 | 22.581 | 167.591 | 13.941.804 | Subtotal |
| Mata uang asing (Catatan 39) | | | | | | | Foreign currencies (Note 39) |
| Pihak berelasi (Catatan 37) | 8.048 | - | - | - | - | 8.048 | Related parties (Note 37) |
| Pihak ketiga | 346.400 | 59.551 | - | - | - | 405.951 | Third parties |
| Jumlah | 354.448 | 59.551 | - | - | - | 413.999 | Subtotal |
| **Jumlah** | **12.852.205** | **1.285.918** | **27.508** | **22.581** | **167.591** | **14.355.803** | **Total** |

| | 2023 | | | | | | |
|---|---|---|---|---|---|---|---|
| **Jenis** | **Lancar/ *Current*** | **Dalam Perhatian Khusus/ *Special Mention*** | **Kurang Lancar/ *Substandard*** | **Diragukan/ *Doubtful*** | **Macet/ *Loss*** | **Jumlah/ *Total*** | **Types of Loans** |
| Rupiah | | | | | | | Rupiah |
| Pihak berelasi (Catatan 37) | 203.340 | - | - | - | - | 203.340 | Related parties (Note 37) |
| Pihak ketiga | 14.112.288 | 1.765.388 | 55.299 | 20.773 | 183.932 | 16.137.680 | Third parties |
| Jumlah | 14.315.628 | 1.765.388 | 55.299 | 20.773 | 183.932 | 16.341.020 | Subtotal |
| Mata uang asing (Catatan 39) | | | | | | | Foreign currencies (Note 39) |
| Pihak berelasi (Catatan 37) | 7.699 | - | - | - | - | 7.699 | Related parties (Note 37) |
| Pihak ketiga | 456.520 | 66.207 | - | - | - | 522.727 | Third parties |
| Jumlah | 464.219 | 66.207 | - | - | - | 530.426 | Subtotal |
| **Jumlah** | **14.779.847** | **1.831.595** | **55.299** | **20.773** | **183.932** | **16.871.446** | **Total** |

k. Kredit yang bermasalah berdasarkan sektor ekonomi. Rasio kredit bermasalah Bank sesuai dengan peraturan Otoritas Jasa Keuangan diungkapkan pada Catatan 50e.

k. Non-performing loans based on economic sector. The non-performing loans ratio of The Bank's in accordance with the Financial Services Authority Regulation are disclosed in Note 50e.

l. Mutasi cadangan kerugian penurunan nilai kredit adalah sebagai berikut:

l. The changes in allowance for impairment losses on loans are as follows:

| | 2024 | | | | | |
|---|---|---|---|---|---|---|
| | Tahap 1/ *Stage 1* | Tahap 2/ *Stage 2* | Tahap 3/ *Stage 3* | Syariah/ *Sharia* | Jumlah/ *Total* | |
| Saldo awal | 347.689 | 347.364 | 53.952 | 937.241 | 1.686.246 | Beginning balance |
| Saldo awal kerugian kredit ekspektasian pada fasilitas kredit yang belum ditarik | 6.479 | 33 | 54 | - | 6.566 | Beginning balance of expected credit losses on undrawn facilities |
| Aset keuangan yang baru diperoleh | 108.194 | - | - | - | 108.194 | Recenlty acquired financial assets |
| Perubahan bersih pada eksposur dan pengukuran kembali | 7.897 | (21.706) | (110.842) | (13.205) | (137.856) | Net change in exposure and reamesurement |
| Transfer ke kerugian kredit ekspektasian 12 bulan (Tahap 1) | 11.506 | (48.998) | (3.535) | - | (41.027) | Transfer to 12-month expected credit losses (Stage 1) |
| Transfer ke kerugian kredit ekspektasian sepanjang umurnya (Tahap 2) | (39.880) | 124.146 | (32.450) | - | 51.816 | Transfer to lifetime expected credit losses (Stage 2) |
| Transfer ke penurunan kredit (Tahap 3) | (137.446) | (90.768) | 301.274 | - | 73.060 | Transfer to credit impairment losses (Stage 3) |
| Penghapusbukuan selama periode berjalan | - | - | (40.419) | (148.558) | (188.977) | Write-off during the period |
| Selisih kurs | (23) | - | - | - | (23) | Exchange difference rate |
| Saldo akhir kerugian kredit ekspektasian pada fasilitas kredit yang belum ditarik | (8.471) | (5) | (7) | - | (8.483) | Expected credit losses on undistributed credit facilities |
| **Saldo akhir** | **295.945** | **310.066** | **168.027** | **775.478** | **1.549.516** | **Ending Balance** |

| | 2023 | | | | | |
|---|---|---|---|---|---|---|
| | Tahap 1/ *Stage 1* | Tahap 2/ *Stage 2* | Tahap 3/ *Stage 3* | Syariah/ *Sharia* | Jumlah/ *Total* | |
| Saldo awal | 105.916 | 326.469 | 859.110 | 829.630 | 2.121.125 | Beginning balance |
| Saldo awal kerugian kredit ekspektasian pada fasilitas kredit yang belum ditarik | 11.298 | 32 | 22 | - | 11.352 | Beginning balance of expected credit losses on undrawn facilities |
| Aset keuangan yang baru diperoleh | 59.086 | 26 | | - | 59.112 | Recenlty acquired financial assets |
| Perubahan bersih pada eksposur dan pengukuran kembali | 232.257 | 14.875 | 87.885 | 118.034 | 453.051 | Net change in exposure and reamesurement |
| Transfer ke kerugian kredit ekspektasian 12 bulan (Tahap 1) | 15.356 | (63.569) | (12.110) | - | (60.323) | Transfer to 12-month expected credit losses (Stage 1) |
| Transfer ke kerugian kredit ekspektasian sepanjang umurnya (Tahap 2) | (69.740) | 208.812 | (36.559) | - | 102.513 | Transfer to lifetime expected credit losses (Stage 2) |
| Transfer ke penurunan kredit (Tahap 3) | (1) | (139.248) | 254.069 | - | 114.820 | Transfer to credit impairment losses (Stage 3) |
| Penghapusbukuan selama periode berjalan | - | - | (1.210.245) | (10.423) | (1.220.668) | Write-off during the period |
| Selisih kurs | (4) | | 111.834 | - | 111.830 | Exchange difference rate |
| Saldo akhir kerugian kredit ekspektasian pada fasilitas kredit yang belum ditarik | (6.479) | (33) | (54) | - | (6.566) | Expected credit losses on undistributed credit facilities |
| **Saldo akhir** | **347.689** | **347.364** | **53.952** | **937.241** | **1.686.246** | **Ending Balance** |

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai untuk kredit yang diberikan adalah cukup untuk menutup kemungkinan kerugian yang akan timbul akibat tidak tertagihnya kredit yang diberikan tersebut.

Management believes that the allowance for impairment losses on loans is adequate to cover the losses which might arise from uncollectible loans.

m. Mutasi kredit yang dihapus buku selama periode 31 Desember 2024 dan 2023 adalah sebagai berikut:

m. The movement of loans written-off during the period of December 31, 2024 and 2023 are follows:

| | 2024 | | | 2023 | | | |
|---|---|---|---|---|---|---|---|
| | Rupiah | Mata Uang Asing/ *Foreign currency* | Jumlah/ *Total* | Rupiah | Mata Uang Asing/ *Foreign currency* | Jumlah/ *Total* | |
| Saldo awal tahun | 4.955.184 | 779.135 | 5.734.319 | 4.540.065 | 85.162 | 4.625.227 | Beginning balance at the beginning year |
| Mutasi selama tahun berjalan | | | | | | | Movement during the year |
| Penghapusan | 188.977 | - | 188.977 | 525.765 | 694.903 | 1.220.668 | Write-off |
| Penerimaan kembali | (58.599) | - | (58.599) | (78.154) | - | (78.154) | Recovery |
| Hapus tagih | 23.297 | - | 23.297 | (32.492) | - | (32.492) | Write-off charges |
| Selisih kurs penjabaran | - | (24.037) | (24.037) | - | (930) | (930) | Exchange rate difference |
| **Saldo akhir** | **5.108.859** | **755.098** | **5.863.957** | **4.955.184** | **779.135** | **5.734.319** | **Ending balance** |

n. Jaminan pemberian kredit umumnya berupa tanah, bangunan, mesin, persediaan dan deposito berjangka.

n. Loan collaterals are generally in the form of land, buildings, machinery, inventories and time deposits.

o. Rasio kredit usaha kecil terhadap jumlah kredit yang diberikan pada tanggal 31 Desember 2024 dan 2023 adalah masing-masing sebesar 8,16% dan 5,80%.

o. The ratios of small business loans to total loans at December 31, 2024 and 2023 are 8.16% and 5.80%, respectively.

## 10. Tagihan dan Liabilitas Akseptasi

## 10. Acceptances Receivable and Payable

Tagihan Akseptasi

Acceptances Receivable

a. Berdasarkan jangka waktu perjanjian:

a. By term of agreements:

| | 2024 | 2023 | |
|---|---|---|---|
| Rupiah | | | Rupiah |
| 1 bulan atau kurang | 6.911 | 7.946 | 1 month or less |
| 1-3 bulan | 471 | 12.779 | 1-3 months |
| 3-6 bulan | - | 9.066 | 3-6 months |
| Jumlah | 7.382 | 29.791 | Total |
| Mata uang asing (Catatan 39) | | | Foreign currencies (Note 39) |
| 1-3 bulan | 30.762 | 40.721 | 1-3 months |
| 3-6 bulan | - | 9.352 | 3-6 months |
| Jumlah | 30.762 | 50.073 | Total |
| Jumlah | 38.144 | 79.864 | Total |
| Cadangan kerugian penurunan nilai | (15) | (1.560) | Allowance for impaiment losses |
| **Jumlah - bersih** | **38.129** | **78.304** | **Total - net** |

b. Berdasarkan sisa umur sampai dengan saat jatuh tempo:

b. Based on remaining maturity:

| | 2024 | 2023 | |
|---|---|---|---|
| Rupiah | | | Rupiah |
| 1 bulan atau kurang | 6.911 | 18.978 | 1 month or less |
| 1-3 bulan | 471 | 10.813 | 1-3 months |
| Jumlah | 7.382 | 29.791 | Total |
| Mata uang asing (Catatan 39) | | | Foreign currencies (Note 39) |
| 1 bulan atau kurang | 22.227 | 32.282 | 1 month or less |
| 1-3 bulan | 8.535 | 17.791 | 1-3 months |
| Jumlah | 30.762 | 50.073 | Total |
| Jumlah | 38.144 | 79.864 | Total |
| Cadangan kerugian penurunan nilai | (15) | (1.560) | Allowance for impaiment losses |
| **Jumlah - bersih** | **38.129** | **78.304** | **Total - net** |

c. Kolektibilitas tagihan dan liabilitas akseptasi sesuai Peraturan Otoritas Jasa Keuangan diungkapkan pada Catatan 50f.

c. Collectibility acceptance receivables and payable in accordance with Financial Services Authority Regulation are disclosed in Note 50f.

d. Perubahan cadangan kerugian penurunan nilai tagihan akseptasi adalah sebagai berikut:

d. The changes in allowance for impairment losses on acceptances receivable are as follows:

| | 2024 | | | | |
|---|---|---|---|---|---|
| | Tahap 1/ *Stage 1* | Tahap 2/ *Stage 2* | Tahap 3/ *Stage 3* | Jumlah/ *Total* | |
| Saldo awal tahun | 1.560 | - | - | 1.560 | Balance at the beginning of the year |
| Pemulihan tahun berjalan | (1.545) | | | (1.545) | Reversal for current year |
| Saldo akhir periode | 15 | - | - | 15 | Balance at the end of the year |

| | 2023 | | | | |
|---|---|---|---|---|---|
| | Tahap 1/ *Stage 1* | Tahap 2/ *Stage 2* | Tahap 3/ *Stage 3* | Jumlah/ *Total* | |
| Saldo awal tahun | 593 | - | - | 593 | Balance at the beginning of the year |
| Pembentukan tahun berjalan | 967 | | | 967 | Provision of current year |
| Saldo akhir tahun | 1.560 | - | - | 1.560 | Balance at the end of the year |

e. Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai untuk tagihan akseptasi pada tanggal 31 Desember 2024 dan 2023 adalah cukup untuk menutup kemungkinan kerugian yang akan timbul akibat tidak tertagihnya tagihan akseptasi tersebut.

e. Management believes that the allowance for impairment losses on acceptances receivable as at December 31, 2024 and 2023 is adequate to cover the losses which might arise from uncollectible acceptances receivable.

Liabilitas Akseptasi

Acceptances Payable

a. Berdasarkan jangka waktu perjanjian:

a. By term of agreements:

| | 2024 | 2023 | |
|---|---|---|---|
| Rupiah | | | Rupiah |
| 1 bulan atau kurang | 6.911 | 7.948 | 1 month or less |
| 1-3 bulan | 471 | 12.784 | 1-3 months |
| 3-6 bulan | - | 9.066 | 3-6 months |
| Jumlah | 7.382 | 29.798 | Total |
| Mata uang asing (Catatan 39) | | | Foreign currencies (Note 39) |
| 1-3 bulan | 30.778 | 40.730 | 1-3 months |
| 3-6 bulan | - | 9.352 | 3-6 months |
| Jumlah | 30.778 | 50.082 | Total |
| **Jumlah** | **38.160** | **79.880** | **Total** |

b. Berdasarkan sisa umur sampai dengan saat jatuh tempo:

b. Based on remaining maturity:

| | 2024 | 2023 | |
|---|---|---|---|
| Rupiah | | | Rupiah |
| 1 bulan atau kurang | 6.911 | 18.981 | 1 month or less |
| 1-3 bulan | 471 | 10.817 | 1-3 months |
| Jumlah | 7.382 | 29.798 | Total |
| Mata uang asing (Catatan 39) | | | Foreign currencies (Note 39) |
| 1 bulan atau kurang | 22.237 | 32.291 | 1 month or less |
| 1-3 bulan | 8.541 | 17.791 | 1-3 months |
| Jumlah | 30.778 | 50.082 | Total |
| **Jumlah** | **38.160** | **79.880** | **Total** |

## 11. Pendapatan yang masih akan diterima

Pendapatan yang masih akan diterima merupakan piutang bunga dan piutang bagi hasil pembiayaan syariah.

## 11. Accrued Income

Accrued income consist of interest and profit sharing of sharia financing receivables.

| | 2024 | 2023 | |
|---|---|---|---|
| Piutang Bunga | | | Interest Receivables |
| Efek-efek | 235.291 | 255.131 | Securities |
| Kredit | 35.060 | 45.356 | Loans |
| Penempatan pada bank lain | 2.623 | 92 | Placements with other banks |
| Jumlah | 272.974 | 300.579 | Total |
| Piutang Syariah | | | Sharia Receivables |
| Piutang dan pembiayaan syariah | 15.384 | 22.651 | Sharia receivables and sharia financing |
| Efek-efek | 116.733 | 3.521 | Securities |
| Jumlah | 132.117 | 26.172 | Total |
| **Jumlah** | **405.091** | **326.751** | **Total** |

## 12. Biaya Dibayar Dimuka

## 12. Prepaid Expenses

| | 2024 | 2023 | |
|---|---|---|---|
| Asuransi | 331.165 | 689.983 | Insurance |
| Pemeliharaan perangkat lunak dan keras | 116.482 | 102.252 | Software and hardware maintenance |
| Promosi dan pengembangan usaha | 67.490 | 54.443 | Promotion and operating development |
| Sewa | 22.820 | 19.912 | Rental |
| Program kepemilikan kendaraan karyawan | 20.993 | 2.402 | Vehicle ownership program |
| Renovasi cabang baru | 14.859 | 16.282 | New branches renovation costs |
| Jasa produksi | 17.034 | - | Production service |
| Lain-lain | 21.134 | 36.674 | Others |
| **Jumlah** | **611.977** | **921.948** | **Total** |

Pada tanggal 31 Desember 2024 dan 2023, asuransi dibayar dimuka termasuk asuransi kredit kepada PT Asuransi Simas Insurtech, pihak berelasi masing-masing sebesar Rp290.301 dan Rp638.661, dengan masa manfaat sampai dengan 15 November 2025.

Asuransi dibayar dimuka diamortisasi selama masa manfaat dengan menggunakan metode garis lurus.

As of December 31, 2024 and 2023, prepaid insurance includes insurance credit from PT Asuransi Simas Insurtech, a related party, amounting to Rp290,301 and Rp638,661, respectively, with benefits until November 15, 2025.

Prepaid insurance is amortized over the period benefited using the straight-line method.

## 13. Aset Tetap dan Aset Hak Guna

## 13. Fixed Assets and Right of Use Assets

Aset tetap terdiri dari:

Fixed assets consist of the following:

| | 1 Januari/ *January 1,* 2024 | Perubahan selama tahun berjalan/ *Changes during the year* | | 31 Desember/ *December 31,* 2024 | |
|---|---|---|---|---|---|
| | | Penambahan/ *Additions* | Pengurangan/ *Deductions* | | |
| **Kepemilikan langsung:** | | | | | **Direct ownership:** |
| **Nilai revaluasian:** | | | | | **Revalued amount:** |
| Tanah | 387.034 | - | - | 387.034 | Land |
| Bangunan | 265.685 | 1.512 | - | 267.197 | Buildings |
| **Biaya perolehan:** | | | | | **At cost:** |
| Inventaris kantor | 2.071.605 | 151.352 | (37.243) | 2.185.714 | Office equipment |
| Kendaraan bermotor | 18.628 | 224 | (1.571) | 17.281 | Vehicles |
| Subtotal | 2.742.952 | 153.088 | (38.814) | 2.857.226 | Subtotal |
| **Aset hak-guna** | | | | | **Right-of-use assets** |
| Bangunan | 342.832 | 77.920 | - | 420.752 | Buildings |
| Kendaraan | 151.801 | 24.426 | (6.069) | 170.158 | Vehicles |
| Subtotal | 494.633 | 102.346 | (6.069) | 590.910 | Subtotal |
| Jumlah | **3.237.585** | 255.434 | (44.883) | **3.448.136** | Total |
| **Akumulasi penyusutan** | | | | | **Accumulated depreciation** |
| **Nilai revaluasian:** | | | | | **Revalued amount:** |
| Bangunan | 15.485 | 30.305 | - | 45.790 | Buildings |
| **Biaya perolehan:** | | | | | **At cost:** |
| Inventaris kantor | 1.251.231 | 159.849 | (30.984) | 1.380.096 | Office equipment |
| Kendaraan bermotor | 20.680 | 285 | (1.428) | 19.537 | Vehicles |
| Subtotal | 1.287.396 | 190.439 | (32.412) | 1.445.423 | Subtotal |
| **Aset hak-guna** | | | | | **Right-of-use assets** |
| Bangunan | 264.737 | 78.369 | - | 343.106 | Buildings |
| Kendaraan | 79.377 | 26.356 | (1.889) | 103.844 | Vehicles |
| Subtotal | 344.114 | 104.725 | (1.889) | 446.950 | Subtotal |
| Jumlah | 1.631.510 | 295.164 | (34.301) | 1.892.373 | Total |
| **Nilai Tercatat** | **1.606.075** | | | **1.555.763** | **Net Book Value** |

| | 1 Januari/ *January 1,* 2023 | Perubahan selama tahun berjalan/ *Changes during the year* | | | | | 31 Desember/ *December 31,* 2023 | |
|---|---|---|---|---|---|---|---|---|
| | | Penambahan/ *Additions* | Pengurangan/ *Deductions* | Eliminasi Akumulasi Penyusutan/ *Estimated Accumulated Depreciation* | Surplus Revaluasi/ Revaluation Surplus | Penyesuaian/ *Adjustment* | | |
| **Kepemilikan langsung:** | | | | | | | | **Direct ownership:** |
| **Nilai revaluasian:** | | | | | | | | **Revalued amount:** |
| Tanah | 372.579 | - | - | - | 14.455 | - | 387.034 | Land |
| Bangunan | 255.822 | 1.899 | - | (58.867) | 71.920 | (5.089) | 265.685 | Buildings |
| **Biaya perolehan:** | | | | | | | | **At cost:** |
| Inventaris kantor | 1.910.812 | 164.587 | (3.794) | - | - | - | 2.071.605 | Office equipment |
| Kendaraan bermotor | 19.735 | 203 | (1.310) | - | - | - | 18.628 | Vehicles |
| Subtotal | 2.558.948 | 166.689 | (5.104) | (58.867) | 86.375 | (5.089) | 2.742.952 | Subtotal |
| **Aset hak-guna** | | | | | | | | **Right-of-use assets** |
| Bangunan | 254.173 | 88.659 | - | - | - | - | 342.832 | Buildings |
| Kendaraan | 124.357 | 28.933 | (1.489) | - | - | - | 151.801 | Vehicles |
| Subtotal | 378.530 | 117.592 | (1.489) | - | - | - | 494.633 | Subtotal |
| Jumlah | **2.937.478** | 284.281 | (6.593) | (58.867) | 86.375 | (5.089) | **3.237.585** | Total |
| **Akumulasi penyusutan** | | | | | | | | **Accumulated depreciation** |
| **Nilai revaluasian:** | | | | | | | | **Revalued amount:** |
| Bangunan | 51.641 | 22.711 | - | (58.867) | - | - | 15.485 | Buildings |
| **Biaya perolehan:** | | | | | | | | **At cost:** |
| Inventaris kantor | 1.099.480 | 155.286 | (3.535) | - | - | - | 1.251.231 | Office equipment |
| Kendaraan bermotor | 21.672 | 318 | (1.310) | - | - | - | 20.680 | Vehicles |
| Subtotal | 1.172.793 | 178.315 | (4.845) | (58.867) | - | - | 1.287.396 | Subtotal |
| **Aset hak-guna** | | | | | | | | **Right-of-use assets** |
| Bangunan | 200.622 | 64.115 | - | - | - | - | 264.737 | Buildings |
| Kendaraan | 55.860 | 24.814 | (1.297) | - | - | - | 79.377 | Vehicles |
| Subtotal | 256.482 | 88.929 | (1.297) | - | - | - | 344.114 | Subtotal |
| Jumlah | 1.429.275 | 267.244 | (6.142) | (58.867) | - | - | 1.631.510 | Total |
| **Nilai Tercatat** | **1.508.203** | | | | | | **1.606.075** | **Net Book Value** |

| | |
|---|---|
| Jumlah beban penyusutan yang dibebankan pada laba rugi pada tanggal 31 Desember 2024 dan 2023 masing-masing sebesar Rp295.164 dan Rp267.244. | Depreciation expense charged to profit or loss as of December 31, 2024 and 2023 amounted to Rp295,164 and Rp267,244, respectively. |
| Jumlah pengeluaran kas untuk sewa selama periode yang berakhir pada tanggal 31 Desember 2024 dan 2023 masing-masing sebesar Rp117.903 dan Rp111.120. | Total cash disbursements for lease during the year ended December 31, 2024 and 2023 amounted to Rp117,903 and Rp111,120, respectively. |
| Pada tanggal 31 Desember 2024 dan 2023, Grup menjual aset tetapnya dengan nilai tercatat masing-masing sebesar Rp77 dan Rp130 pada harga jual masing-masing sebesar Rp767 dan Rp824. Keuntungan bersih penjualan aset tetap tersebut dibukukan pada akun Pendapatan Operasional Lainnya (Catatan 33). | As of December 31, 2024 and 2023, the Group sold its property and equipment with a net book value of Rp77 and Rp130, at a selling price of Rp767 and Rp824, respectively. The related gain on sale of property and equipment is recognized in Other Operating Revenue (Note 33). |
| Pada tanggal dan 31 Desember 2024 dan 2023, Perusahaan menghapus aset tetap dengan nilai tercatat Rp66 dan Rp129. Kerugian atas penghapusan aset tetap tersebut dibukukan pada akun Beban Operasional Lainnya (Catatan 34). | As of December 31, 2024 and 2023, property and equipment with a net book value of Rp66 and Rp129, had been written-off. Losses on the write-off of property and equipment is recognized in Other Operating Expenses account (Note 34). |
| Pada tanggal 31 Desember 2024 dan 2023, aset tetap Grup, kecuali tanah, diasuransikan terhadap risiko kebakaran, gempa bumi, huru-hara, pencurian dan risiko lainnya pada PT Asuransi Sinar Mas, pihak berelasi, dengan nilai pertanggungan masing-masing sebesar Rp917.905 dan Rp963.472 (Catatan 37). Manajemen berpendapat bahwa nilai pertanggungan tersebut cukup untuk menutup kemungkinan kerugian atas aset yang dipertanggungkan. | As of December 31, 2024 and 2023, the Group's property and equipment, except land, are insured against fire, earthquake, riots, theft and other risks with PT Asuransi Sinar Mas, a related party, for Rp917,905 and Rp963,472, respectively (Note 37). Management believes that the insurance coverage is adequate to cover possible losses on the assets insured. |
| Pada tanggal 31 Desember 2024 dan 2023, tidak terdapat komitmen kontraktual dalam perolehan aset tetap. | As of December 31, 2024 and 2023, there are no contractual commitments in the acquisition of property and equipment. |
| Manajemen telah mengkaji ulang atas estimasi umur ekonomis, metode penyusutan, dan nilai residu pada setiap akhir periode pelaporan. | Management has reviewed the estimated economic life, depreciation method, and residual value at the end of each reporting period. |
| Pada tanggal 31 Desember 2024 dan 2023, tidak terdapat perubahan estimasi masa manfaat dan/atau metode penyusutan aset tetap. | As of December 31, 2024 and 2023, there are no changes on the estimated useful life and/or the method of depreciation of property and equipment. |
| Pada tanggal 31 Desember 2024 dan 2023, tidak ada aset tetap Perusahaan yang ditempatkan sebagai jaminan. | As of December 31, 2024 and 2023, there are no property and equipment used as collateral. |
| Manajemen berpendapat bahwa tidak terdapat penurunan nilai atas aset tetap tersebut pada tanggal 31 Desember 2024 dan 2023. | Management believes that there is no impairment in value of the aforementioned assets as of December 31, 2024 and 2023. |

Pada tanggal 31 Desember 2024 dan 2023, tidak terdapat aset tetap yang tidak dipakai sementara.

As of December 31, 2024 and 2023, there are no property and equipment that are not used temporarily.

Pada tanggal 31 Desember 2024 dan 2023, tidak terdapat aset tetap yang berasal dari hibah.

As of December 31, 2024 and 2023, there are no property and equipment that come from grants.

Pada tanggal 31 Desember 2024 dan 2023, tidak terdapat aset tetap yang dihentikan dari penggunaan aktif dan diklasifikasikan sebagai dimiliki untuk dijual.

As of December 31, 2024 and 2023, there are no property and equipment that have been discontinued from active use and are classified as held for sale.

Pada tanggal 31 Desember 2024 dan 2023, aset tetap Grup dengan nilai perolehan Rp591.509 dan Rp513.408 telah disusutkan penuh, namun masih digunakan untuk menunjang operasional grup.

As of December 31, 2024 and 2023, the Group's property and equipment with acquisition cost of Rp591,509 and Rp513,408 has been fully depreciated, but is still being used to support the Group's operations.

Tanah dan bangunan Grup direvaluasi dengan menggunakan saldo tanggal 11 Juli 2023, dengan laporan penilai dari KJPP Firmansyah & Rekan, penilai independen, dengan laporan No. 00787/2.0115-00/PI/07/0249/1/VII/2023 tanggal 18 Agustus 2023 yang telah ditandatangani oleh Firmansyah, S.T.MAPPI (Cert). Penilaian ditentukan menggunakan metode sebagaimana dijelaskan pada Catatan 14. Surplus revaluasi dikreditkan pada akun "Komponen ekuitas lainnya" dalam laporan perubahan ekuitas.

The Group's land and buildings are revalued using the balance as of July 11, 2023, based on appraisal report of KJPP Firmansyah dan Rekan, independent valuers, with report No. 00787/ 2.0115-00/PI/07/0249/1/VII/2023 dated August 18, 2023, which was signed by Firmansyah S.T.MAPPI (Cert). Fair value has been determined as described in Note 14. The revaluation surplus was credited to "Other equity components" in the statements of changes in equity.

Jika tanah dan bangunan dinyatakan pada metode biaya, nilai tercatat akan menjadi:

If land and buildings were stated on the historical cost basis, the amount would be as follows:

| | 2024 | 2023 | |
|---|---|---|---|
| Biaya perolehan | 602.560 | 601.049 | Cost |
| Akumulasi penyusutan | (169.942) | (159.645) | Accumulated depreciation |
| Nilai tercatat | 432.618 | 441.404 | Net book value |

## 14. Nilai Wajar Aset Non Keuangan / 14. Fair Value of Non - Financial Assets

| | 2024 | 2023 | |
|---|---|---|---|
| Pengukuran nilai wajar berulang | | | Recurring fair value measurements |
| Tanah dan bangunan (aset tetap) | 652.720 | 652.720 | Land and buildings (under property and equipment) |

Pengukuran nilai wajar berulang aset non keuangan termasuk dalam Level 2 hierarki nilai wajar sebagaimana dijelaskan pada Catatan 2.

The fair value measurement for recurring non-financial assets falls within Level 2 of the fair value hierarchy as outlined in Note 2.

Informasi tentang pengukuran nilai wajar yang menggunakan input signifikan yang tidak dapat diobservasi (Level 2) adalah sebagai berikut:

The information about fair value measurements using significant unobservable input (Level 2) are as follows:

| Keterangan/*Description* | Teknik penilaian/*Valuation technique* |
|---|---|
| Aset tetap (tanah dan bangunan)/ *Property and equipment (land and buildings)* | Metode perbandingan data pasar dengan penyesuaian faktor yang dianggap relevan/ *Market-comparable approach with adjustments for relevant factors* |

Tanah dan bangunan telah dinilai oleh penilai independen.

Seluruh aset dimanfaatkan pada penggunaan tertinggi dan terbaiknya.

Surplus revaluasi tanah dan bangunan dalam Catatan 13 mencerminkan keuntungan belum direalisasi yang diakui pada penghasilan komprehensif lain.

Land and buildings have been revalued by independent appraiser.

All assets are used based on their highest and best use.

Revaluation surplus of land and buildings in Note 13 represent gain recognized in other comprehensive income.

## 15. Aset Ijarah / 15. Ijarah Assets

Akun ini merupakan obyek sewa dari transaksi Ijarah *Muntahiyah Bittamlik* dengan opsi perpindahan hak milik obyek sewa dengan hibah.

This account represents objects of the Ijarah Muntahiyah Bittamlik lease transactions with an option to transfer the object property being leased by the grant.

| | 1 Januari/ *January 1, 2024* | Perubahan selama tahun berjalan/ *Changes during the year*: Penambahan/ *Additions* | Pengalihan pada akhir masa akad/ *Transfer of the lease at end of contract* | 31 Desember/ *December 31, 2024* | |
|---|---|---|---|---|---|
| Biaya perolehan | 503.469 | 201.750 | (344.473) | 360.746 | Cost |
| Akumulasi penyusutan | 119.251 | 293.423 | (344.473) | 68.202 | Accumulated depreciation |
| **Nilai tercatat** | **384.218** | **(91.673)** | **-** | **292.544** | **Net book value** |

| | 1 Januari/ *January 1, 2023* | Perubahan selama tahun berjalan/ *Changes during the year*: Penambahan/ *Additions* | Pengalihan pada akhir masa akad/ *Transfer of the lease at end of contract* | 31 Desember/ *December 31, 2023* | |
|---|---|---|---|---|---|
| Biaya perolehan | 485.505 | 85.805 | (67.841) | 503.469 | Cost |
| Akumulasi penyusutan | 87.886 | 99.206 | (67.841) | 119.251 | Accumulated depreciation |
| **Nilai tercatat** | **397.619** | **(13.401)** | **-** | **384.218** | **Net book value** |

## 16. Aset Lain-lain - Bersih / 16. Other Assets - Net

| | 2024 | 2023 | |
|---|---|---|---|
| Uang muka pembelian aset | 137.321 | 185.930 | Advances for purchase of assets |
| Agunan yang diambil-alih | 116.413 | 125.621 | Foreclosed assets |
| Tagihan sehubungan dengan ATM bersama | 48.792 | 72.841 | Receivables related to ATM bersama |
| Setoran jaminan | 35.670 | 35.747 | Security deposits |
| Barang cetakan dan materai | 30.572 | 17.104 | Printing materials and stamp duty |
| Tagihan komisi asuransi | 23.260 | 20.825 | Insurance commission receivables |
| Uang muka renovasi gedung kantor | 22.743 | 17.583 | Advances for building renovation |
| Tagihan subsidi Pemerintah | 12.099 | 12.169 | Government subsidy receivable |
| Tagihan sehubungan dengan transaksi QR | 3.331 | 7.402 | Receivables related to QR Transaction |
| Tagihan derivatif | 1.855 | 27.502 | Derivative receivables |
| Tagihan sehubungan dengan jaringan principal kartu kredit | 474 | 616 | Receivables related to principal network credit card |
| Pajak dibayar dimuka | 184 | 223 | Prepaid tax |
| Lain-lain | 23.097 | 20.461 | Others |
| Jumlah | 455.811 | 544.024 | Subtotal |
| Cadangan kerugian penurunan nilai | (80.384) | (88.120) | Allowance for impairment losses |
| **Jumlah - bersih** | **375.427** | **455.904** | **Net** |

Pada tanggal 31 Desember 2024 dan 2023, nilai tercatat agunan yang diambil-alih adalah masing-masing sebesar Rp36.029 dan Rp37.501, setelah dikurangi dengan cadangan kerugian penurunan nilai masing-masing sebesar Rp80.384 dan Rp88.120.

As of December 31, 2024 and 2023, the carrying value of foreclosed properties amounted Rp36,029 and Rp37,501, respectively, after allowance for impairment losses amounting to Rp80,384 and Rp88,120, respectively.

Kolektibilitas agunan yang diambil alih sesuai dengan Peraturan Otoritas Jasa Keuangan diungkapkan pada Catatan 50i.

Collectibility of foreclosed collaterals in accordance with Financial Services Authority Regulations are disclosed in Note 50i.

Mutasi cadangan kerugian penurunan nilai aset lain–lain adalah sebagai berikut:

Movements in allowance for impairment losses – other assets are as follows:

| | 2024 | 2023 | |
|---|---|---|---|
| Saldo awal tahun | 88.120 | 247.959 | Beginning balance of the year |
| Pemulihan tahun berjalan | (7.736) | (159.839) | Reversal for current year |
| Saldo akhir tahun | 80.384 | 88.120 | Ending balance of the year |

Rincian transaksi derivatif atas *swap* mata uang asing pada tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut:

Details of derivative transaction on foreign currency swaps as of December 31, 2024 and 2023 are as follows:

| | 2024 | | | | |
|---|---|---|---|---|---|
| | Nilai kontrak/ *Contract amount* | Nilai wajar/ Fair value | Tagihan derivatif/ *Derivatives receivable* | Liabilitas derivatif/ *Derivatives payable* | |
| **Pihak berelasi** | | | | | **Related parties** |
| **Mata uang asing** | | | | | **Foreign currency** |
| Transaksi *swap* : | | | | | Swap transaction: |
| PT Smart Tbk | 38.989 | (902) | 10 | (912) | PT Smart Tbk |
| Transaksi *domestic non deliverable forward:* | | | | | Domestic non deliverable forward transaction: |
| PT Smart Tbk | 283 | (20) | - | (20) | PT Smart Tbk |
| **Pihak ketiga** | | | | | **Third parties** |
| **Mata uang asing** | | | | | **Foreign currency** |
| Transaksi *spot* : | | | | | Spot transaction: |
| Bank of China | 225.757 | (497) | 239 | (736) | Bank of China |
| PT Bank KB Bukopin Tbk | 97.402 | 408 | 408 | - | PT Bank KB Bukopin Tbk |
| PT Bank KEB Hana Indonesia | 64.816 | 211 | 211 | - | PT Bank KEB Hana Indonesia |
| PT Bank BTPN Tbk | 48.756 | 231 | 231 | - | PT Bank BTPN Tbk |
| PT Bank JTrust Indonesia Tbk | 48.632 | 167 | 167 | - | PT Bank JTrust Indonesia Tbk |
| PT Bank Permata Tbk | 48.626 | 166 | 166 | - | PT Bank Permata Tbk |
| Bank Shinhan Indonesia | 32.454 | 129 | 129 | - | Bank Shinhan Indonesia |
| PT Bank Central Asia Tbk | 32.404 | 104 | 104 | - | PT Bank Central Asia Tbk |
| PT Bank Victoria International Tbk | 16.262 | 82 | 82 | - | PT Bank Victoria International Tbk |
| PT Bank Ganesha Tbk | 16.236 | 68 | 68 | - | PT Bank Ganesha Tbk |
| PT Bank Maybank Indonesia Tbk | 16.180 | 40 | 40 | - | PT Bank Maybank Indonesia Tbk |
| Deutsche Bank | 16.090 | (78) | - | (78) | Deutsche Bank |
| **Total** | | **109** | **1.855** | **(1.746)** | **Total** |

| | 2023 | | | | |
|---|---|---|---|---|---|
| | Nilai kontrak/ *Contract amount* | Nilai wajar/ Fair value | Tagihan derivatif/ *Derivatives receivable* | Liabilitas derivatif/ *Derivatives payable* | |
| **Pihak berelasi** | | | | | **Related parties** |
| **Mata uang asing** | | | | | **Foreign currency** |
| Transaksi *swap* : | | | | | Swap transaction: |
| PT Berau Coal | 1.895.727 | 23.564 | 23.869 | (305) | PT Berau Coal |
| PT Smart Tbk | 23.829 | 199 | 199 | - | PT Smart Tbk |
| PT Artha Cipta Langgeng | 13.714 | 109 | 109 | - | PT Artha Cipta Langgeng |
| Transaksi *domestic non deliverable forward:* | | | | | Domestic non deliverable forward transaction: |
| PT Sinarmas Sekuritas | 154.344 | (506) | 400 | (906) | PT Sinarmas Sekuritas |
| PT Sinarmas Asset Management | 30.878 | (332) | - | (332) | PT Sinarmas Asset Management |
| **Pihak ketiga** | | | | | **Third parties** |
| **Mata uang asing** | | | | | **Foreign currency** |
| Transaksi *swap* : | | | | | Swap transaction: |
| Citibank N.A. | 153.951 | (559) | - | (559) | Citibank N.A. |
| PT Bank Permata Tbk | 76.975 | (280) | - | (280) | PT Bank Permata Tbk |
| Transaksi *spot* : | | | | | Spot transaction: |
| Citibank N.A. | 154.169 | 87 | 102 | (15) | Citibank N.A. |
| Deutsche Bank | 123.157 | (298) | - | (298) | Deutsche Bank |
| PT Bank KB Bukopin Tbk | 92.532 | 73 | 73 | - | PT Bank KB Bukopin Tbk |
| Bank Pan Indonesia Tbk | 77.211 | 111 | 111 | - | Bank Pan Indonesia Tbk |
| PT Bank KEB Hana | 76.973 | (77) | 19 | (96) | PT Bank KEB Hana |
| PT Bank CTBC indonesia | 61.655 | 32 | 32 | - | PT Bank CTBC indonesia |
| Bank of China | 53.976 | (13) | 45 | (58) | Bank of China |
| MUFG Bank, Ltd | 46.279 | 43 | 43 | - | MUFG Bank, Ltd |
| PT Indonesia 1906 Tbk | 30.909 | 57 | 57 | - | PT Indonesia 1906 Tbk |
| PT Bank Permata Tbk | 30.865 | 35 | 35 | - | PT Bank Permata Tbk |
| PT (Persero) Tbk | 30.855 | 30 | 30 | - | PT (Persero) Tbk |
| PT Bank Pembangunan Daerah Jawa Barat dan Banten, Tbk | 30.789 | (51) | - | (51) | PT Bank Pembangunan Daerah Jawa Barat dan Banten, Tbk |
| PT Bank Multi Artha Sentosa | 23.202 | 53 | 53 | - | PT Bank Multi Artha Sentosa |
| PT Bank Negara Indonesia (Persero) Tbk | 15.446 | 24 | 24 | - | PT Bank Negara Indonesia (Persero) Tbk |
| PT Bank Central Asia Tbk | 15.442 | 22 | 22 | - | PT Bank Central Asia Tbk |
| PT Bank Shinhan Indonesia | 15.426 | 14 | 14 | - | PT Bank Shinhan Indonesia |
| PT Bank JTrust Indonesia Tbk | 15.426 | 14 | 14 | - | PT Bank JTrust Indonesia Tbk |
| PT Bank Maybank Indonesia Tbk | 15.426 | 14 | 14 | - | PT Bank Maybank Indonesia Tbk |
| Transaksi *domestic non deliverable forward* : | | | | | Domestic non deliverable forward transaction: |
| PT Bank Maybank Indonesia Tbk | 188.630 | 1.902 | 2.237 | (335) | PT Bank Maybank Indonesia Tbk |
| **Total** | | **24.267** | **27.502** | **(3.235)** | **Total** |

Kontrak-kontrak untuk posisi 31 Desember 2024 dan 2023 masing-masing jatuh tempo diantara tanggal 2 Januari 2025 - 25 Maret 2025 dan 4 Januari 2024.

Contracts as at December 31, 2024 and 2023 will be matured between January 2, 2025 - March 25, 2025 and January 4, 2024, respectively.

## 17. Liabilitas Segera / 17. Liabilities Immediately Payable

| | 2024 | 2023 | |
|---|---|---|---|
| Beban akrual | 79.548 | 60.018 | Accrued expenses |
| Liabilitas sehubungan dengan jaringan ATM | 27.083 | 61.935 | Payable related to ATM network |
| Kiriman uang | 24.540 | 19.669 | Transfer checks for collection and clearing |
| Liabilitas jasa produksi | 23.770 | - | Production service payable |
| Liabilitas pihak ketiga | 5.842 | - | Thrid party liabilities |
| Liabilitas pembayaran online | 4.546 | 8.644 | Online payment payable |
| Titipan uang elektronik | 3.708 | 2.881 | Electronic money |
| Program loyalitas pelanggan | 2.981 | 2.981 | Customer loyalty program |
| Liabilitas administrasi kredit | 2.587 | 6.062 | Loans administration payable |
| Lain-lain | 4.173 | 5.792 | Others |
| **Jumlah** | **178.778** | **167.982** | **Total** |

## 18. Simpanan / 18. Deposits

Simpanan terdiri dari: / Deposits consist of the following:

| | 2024 | 2023 | |
|---|---|---|---|
| Giro | 17.314.175 | 14.682.168 | Demand deposits |
| Tabungan | 11.440.897 | 10.768.878 | Saving |
| Deposito berjangka | 9.142.343 | 9.691.539 | Time deposit |
| **Jumlah** | **37.897.415** | **35.142.585** | **Total** |

a. Giro terdiri atas: / a. Demand deposits consist of:

| | 2024 | 2023 | |
|---|---|---|---|
| Konvensional | | | Conventional |
| Pihak berelasi (Catatan 37) | | | Related parties (Note 37) |
| Rupiah | 1.360.185 | 2.714.531 | Rupiah |
| Mata uang asing (Catatan 39) | 3.237.550 | 2.214.065 | Foreign currencies (Note 39) |
| Jumlah | 4.597.735 | 4.928.596 | Subtotal |
| Pihak ketiga | | | Third parties |
| Rupiah | 7.994.195 | 6.378.756 | Rupiah |
| Mata uang asing (Catatan 39) | 3.552.758 | 3.276.877 | Foreign currencies (Note 39) |
| Jumlah | 11.546.953 | 9.655.633 | Subtotal |
| Jumlah Konvensional | 16.144.688 | 14.584.229 | Total Conventional |
| Syariah | | | Sharia |
| Giro Wadiah | | | Wadiah Demand Deposits |
| Pihak berelasi (Catatan 37) | | | Related parties (Note 37) |
| Rupiah | 16 | 15 | Rupiah |
| Mata uang asing (Catatan 39) | 10 | 902 | Foreign currencies (Note 39) |
| Jumlah | 26 | 917 | Subtotal |
| Pihak ketiga | | | Third parties |
| Rupiah | 1.133.242 | 31.761 | Rupiah |
| Mata uang asing (Catatan 39) | 36.219 | 65.261 | Foreign currencies (Note 39) |
| Jumlah | 1.169.461 | 97.022 | Subtotal |
| Jumlah Syariah | 1.169.487 | 97.939 | Total Sharia |
| **Jumlah** | **17.314.175** | **14.682.168** | **Total** |

| | 2024 % | 2023 % | |
|---|---|---|---|
| Suku bunga giro per tahun | | | Interest rates per annum on demand deposits |
| Rupiah | 0,00 - 5,00 | 0,00 - 4,75 | Rupiah |
| Mata uang asing | 0,00 - 2,50 | 0,00 - 4,00 | Foreign currencies |

Saldo giro yang diblokir dalam rangka jaminan kredit yang diberikan, bank garansi dan *letters of credit* pada tanggal 31 Desember 2024 dan 2023, masing-masing sebesar Rpnihil dan Rp33.181.

Demand deposit blocked to guarantee loan and the bank guarantee as of December 31, 2024 and 2023 amounted to Rpnil and Rp33,181, respectively.

b. Tabungan terdiri atas:

b. Savings deposit consists of:

| | 2024 | 2023 | |
|---|---|---|---|
| Konvensional | | | Conventional |
| Rupiah | | | Rupiah |
| Pihak berelasi (Catatan 37) | | | Related parties (Note 37) |
| Tabungan Sinarmas | 10.370 | 20.918 | Sinarmas Saving |
| Tabungan Sinarmas Gold | 15.324 | 16.286 | Sinarmas Gold Saving |
| Tabungan Sinarmas Diamond | 75.795 | 43.192 | Sinarmas Diamond Saving |
| Tabunganku | 438 | 973 | Tabunganku |
| Jumlah | 101.927 | 81.369 | Subtotal |
| Pihak ketiga | | | Third parties |
| Tabungan Sinarmas | 2.834.640 | 2.251.996 | Sinarmas Saving |
| Tabungan Sinarmas Gold | 6.568.869 | 5.972.979 | Sinarmas Gold Saving |
| Tabungan Sinarmas Diamond | 1.093.729 | 1.492.200 | Sinarmas Diamond Saving |
| Tabunganku | 648.422 | 766.419 | Tabunganku |
| Jumlah | 11.145.660 | 10.483.594 | Subtotal |
| Jumlah Konvensional | 11.247.587 | 10.564.963 | Total Conventional |
| Syariah | | | Sharia |
| Rupiah | | | Rupiah |
| Pihak berelasi (Catatan 37) | | | Related parties (Note 37) |
| Tabungan Wadiah | 228 | 570 | Wadiah Saving |
| Pihak ketiga | | | Third parties |
| Tabungan Wadiah | 189.415 | 201.121 | Wadiah Saving |
| Mata uang asing (Note 39) | | | Foreign currencies (Note 39) |
| Pihak berelasi (Catatan 37) | | | Related parties (Note 37) |
| Tabungan Wadiah | 1 | 1 | Wadiah Saving |
| Pihak ketiga | | | Third parties |
| Tabungan Wadiah | 3.666 | 2.223 | Wadiah Saving |
| Jumlah Syariah | 193.310 | 203.915 | Total Sharia |
| Jumlah | 11.440.897 | 10.768.878 | Total |

| | 2024 | 2023 | |
|---|---|---|---|
| | % | % | |
| Suku bunga tabungan per tahun | | | Interest rates per annum on saving deposits |
| Rupiah | 0,00 - 5,00 | 0,00 - 5,00 | Rupiah |
| Mata uang asing | 0,00 - 0,50 | 0,00 | Foreign currencies |

Pada tanggal 31 Desember 2024 dan 2023, saldo tabungan yang diblokir dalam rangka jaminan kredit yang diberikan dan bank garansi masing-masing sebesar Rpnihil dan Rp3.126.

Deposit blocked to guarantee loan and the bank guarantee as of December 31, 2024 and 2023 amounted to Rpnil and Rp3,126, respectively.

c. Deposito berjangka terdiri atas:

c. Time deposits consist of:

| | 2024 | 2023 | |
|---|---|---|---|
| Pihak berelasi (Catatan 37) | | | Related parties (Notes 37) |
| Rupiah | 915.293 | 603.088 | Rupiah |
| Mata uang asing (Catatan 39) | 19.080 | 303.676 | Foreign currencies (Note 39) |
| Jumlah | 934.373 | 906.764 | Subtotal |
| Pihak ketiga | | | Third parties |
| Rupiah | 7.716.881 | 7.977.667 | Rupiah |
| Mata uang asing (Catatan 39) | 491.089 | 807.108 | Foreign currencies (Note 39) |
| Jumlah | 8.207.970 | 8.784.775 | Subtotal |
| Jumlah | 9.142.343 | 9.691.539 | Total |

Klasifikasi deposito berjangka berdasarkan jangka waktu adalah sebagai berikut:

The details of time deposits based on maturities are as follows:

Berdasarkan periode deposito berjangka:

Based on contractual maturity:

| | 2024 | | | 2023 | | | |
|---|---|---|---|---|---|---|---|
| | Pihak berelasi (Catatan 37)/ *Related parties (Note 37)* | Pihak ketiga/ *Third parties* | Jumlah/ *Total* | Pihak berelasi (Catatan 37)/ *Related parties (Note 37)* | Pihak ketiga/ *Third parties* | Jumlah/ *Total* | |
| Rupiah | | | | | | | Rupiah |
| Kurang dari 1 bulan | 99.100 | 369.810 | 468.910 | 91.910 | 1.688.536 | 1.780.446 | Less than 1 month |
| 1 bulan | 612.514 | 4.297.650 | 4.910.164 | 430.803 | 3.541.518 | 3.972.321 | 1 month |
| 3 bulan | 30.410 | 1.787.390 | 1.817.800 | 61.253 | 1.615.560 | 1.676.813 | 3 months |
| 6 bulan | 12.268 | 598.407 | 610.675 | 18.122 | 672.520 | 690.642 | 6 months |
| 12 bulan | 161.001 | 440.954 | 601.955 | 1.000 | 445.316 | 446.316 | 12 months |
| Lebih dari 12 bulan | - | 222.670 | 222.670 | - | 14.217 | 14.217 | More than 12 months |
| Jumlah | 915.293 | 7.716.881 | 8.632.174 | 603.088 | 7.977.667 | 8.580.755 | Subtotal |
| Mata uang asing (Catatan 39) | | | | | | | Foreign currencies (Note 39) |
| Kurang dari 1 bulan | - | 65.660 | 65.660 | 27.715 | 33.056 | 60.771 | Less than 1 month |
| 1 bulan | 10.839 | 251.115 | 261.954 | 268.263 | 567.391 | 835.654 | 1 month |
| 3 bulan | 193 | 43.005 | 43.198 | - | 46.316 | 46.316 | 3 months |
| 6 bulan | - | 27.679 | 27.679 | - | 29.345 | 29.345 | 6 months |
| 12 bulan | 8.048 | 103.628 | 111.676 | 7.698 | 131.000 | 138.698 | 12 months |
| Lebih dari 12 bulan | - | 2 | 2 | - | - | - | More than 12 months |
| Jumlah | 19.080 | 491.089 | 510.169 | 303.676 | 807.108 | 1.110.784 | Subtotal |
| Jumlah | 934.373 | 8.207.970 | 9.142.343 | 906.764 | 8.784.775 | 9.691.539 | Total |

Berdasarkan sisa umur sampai dengan saat jatuh tempo:

Based on remaining maturity:

| | 2024 | | | 2023 | | | |
|---|---|---|---|---|---|---|---|
| | Pihak berelasi (Catatan 37)/ *Related parties (Note 37)* | Pihak ketiga/ *Third parties* | Jumlah/ *Total* | Pihak berelasi (Catatan 37)/ *Related parties (Note 37)* | Pihak ketiga/ *Third parties* | Jumlah/ *Total* | |
| Rupiah | | | | | | | Rupiah |
| 1 bulan atau kurang | 713.381 | 5.572.767 | 6.286.148 | 544.745 | 6.019.349 | 6.564.094 | 1 month or less |
| 1 - 3 bulan | 41.630 | 1.263.225 | 1.304.855 | 58.269 | 1.214.879 | 1.273.148 | 1 - 3 months |
| 3 - 6 bulan | 282 | 376.439 | 376.721 | 74 | 500.307 | 500.381 | 3 - 6 months |
| 6 - 12 bulan | 160.000 | 287.956 | 447.956 | - | 234.819 | 234.819 | 6 - 12 months |
| Lebih dari 12 bulan | - | 216.494 | 216.494 | - | 8.313 | 8.313 | More than 12 months |
| Jumlah | 915.293 | 7.716.881 | 8.632.174 | 603.088 | 7.977.667 | 8.580.755 | Subtotal |
| Mata uang asing (Catatan 39) | | | | | | | Foreign currencies (Note 39) |
| 1 bulan atau kurang | 10.839 | 329.748 | 340.587 | 295.977 | 637.934 | 933.911 | 1 month or less |
| 1 - 3 bulan | 193 | 39.439 | 39.632 | - | 63.914 | 63.914 | 1 - 3 months |
| 3 - 6 bulan | - | 23.698 | 23.698 | - | 12.840 | 12.840 | 3 - 6 months |
| 6 - 12 bulan | 8.048 | 98.202 | 106.250 | 7.699 | 92.420 | 100.119 | 6 - 12 months |
| Lebih dari 12 bulan | - | 2 | 2 | - | - | - | 6 - 12 months |
| Jumlah | 19.080 | 491.089 | 510.169 | 303.676 | 807.108 | 1.110.784 | Subtotal |
| Jumlah | 934.373 | 8.207.970 | 9.142.343 | 906.764 | 8.784.775 | 9.691.539 | Total |

| | 2024 | 2023 | |
|---|---|---|---|
| | % | % | |
| Suku bunga deposito per tahun | | | Interest rates per annum on time deposits |
| Rupiah | 0,00 - 6,75 | 0,00 - 6,75 | Rupiah |
| Mata uang asing | 0,00 - 4,50 | 0,00 - 4,50 | Foreign currencies |

Saldo deposito berjangka yang diblokir dalam rangka jaminan kredit yang diberikan, bank garansi dan *letters of credit* pada tanggal 31 Desember 2024 dan 2023, masing-masing adalah sebesar Rp1.064.556 dan Rp823.969.

Total time deposits which are blocked to guarantee loans, bank guarantee and letters of credit as of December 31, 2024 and 2023, amounted to Rp1,064,556 and Rp823,969, respectively.

## 19. Simpanan dari Bank Lain

Seluruh simpanan dari bank lain pada tanggal 31 Desember 2024 dan 2023 merupakan simpanan dalam bentuk giro dari pihak ketiga dengan rincian sebagai berikut:

## 19. Deposits from Other Banks

All deposits from other banks as of December 31, 2024 and 2023 represent deposits in the form of demand deposits with third parties with details as follows:

| | 2024 | 2023 | |
|---|---|---|---|
| Konvensional | | | Conventional |
| Pihak ketiga | | | Third parties |
| Rupiah | | | Rupiah |
| Giro | 43.574 | 40.524 | Demand deposits |
| Deposito berjangka | 21.674 | 11.174 | Time deposits |
| *Call money* | - | 275.000 | Call money |
| Jumlah Konvensional | 65.248 | 326.698 | Total Conventional |
| Syariah | | | Sharia |
| Pihak ketiga | | | Third parties |
| Rupiah | | | Rupiah |
| Giro Wadiah | 1.512 | 747 | Wadiah Demand Deposits |
| **Jumlah** | **66.760** | **327.445** | **Total** |

| | 2024 | 2023 | |
|---|---|---|---|
| | % | % | |
| Suku bunga per tahun | | | Interest rate per anum |
| Rupiah | 0,20 - 4,75 | 0,00 - 6,27 | Rupiah |

## 20. Efek-efek yang Dijual dengan Janji beli Kembali - Pihak Ketiga

Pada tanggal 31 Desember 2024, efek-efek yang dijual dengan janji beli kembali adalah sebagai berikut:

## 20. Securities Sold under Agreement to Repurchased - Third Parties

As of December 31, 2024, securities sold under agreement to repurchased are:

**2024**

| Pihak Lawan/ *Counterparty* | Jenis/ *Type* | Jangka waktu/ *Term* | Tanggal jatuh tempo/ *Due Date* | Nilai bersih/ *Net value* |
|---|---|---|---|---|
| Rupiah | | | | |
| PT Bank Rakyat Indonesia (Persero) Tbk | FR0087 | 28 hari/*days* | 9 Januari/*January 9,* 2025 | 462.622 |
| PT Bank Rakyat Indonesia (Persero) Tbk | FR0087 | 28 hari/*days* | 7 Januari/*January 7,* 2025 | 184.965 |
| PT Bank Negara Indonesia (Persero) Tbk | FR0087 | 28 hari/*days* | 6 Januari/*January 6,* 2025 | 231.868 |
| **Jumlah/*Total*** | | | | **879.455** |

**2023**

| Pihak Lawan/ *Counterparty* | Jenis/ *Type* | Jangka waktu/ *Term* | Tanggal jatuh tempo/ *Due Date* | Nilai bersih/ *Net value* |
|---|---|---|---|---|
| Rupiah | | | | |
| Bank BPD Jatim | FR0087 | 7 hari/*days* | 5 Januari/*January 5, 2024* | 189.364 |
| Bank BPD Jatim | FR0087 | 7 hari/*days* | 5 Januari/*January 5, 2024* | 189.364 |
| Bank BPD Jatim | FR0087 | 7 hari/*days* | 5 Januari/*January 5, 2024* | 189.364 |
| Bank BPD Jatim | FR0082 | 6 hari/*days* | 3 Januari/*January 3, 2024* | 193.449 |
| Bank BPD Jatim | FR0082 | 6 hari/*days* | 3 Januari/*January 3, 2024* | 145.088 |
| Bank BPD Jatim | FR0082 | 6 hari/*days* | 3 Januari/*January 3, 2024* | 145.088 |
| **Jumlah/*Total*** | | | | **1.051.717** |

## 21. Utang Pajak / 21. Taxes Payable

Utang pajak terdiri dari: / Taxes payable consists of:

| | 2024 | 2023 | |
|---|---|---|---|
| Pajak kini | 5.401 | 22.677 | Current tax |
| Pajak penghasilan | | | Income tax |
| Pasal 4 | 19.873 | 14.446 | Article 4 |
| Pasal 21 | 19.419 | 5.813 | Article 21 |
| Pasal 23 dan 26 | 2.169 | 2.244 | Articles 23 and 26 |
| Pasal 25 | 3.933 | - | Article 25 |
| Jumlah pajak penghasilan | 50.795 | 45.180 | Total income tax |
| Pajak pertambahan nilai | 1.924 | 7.392 | Value added tax |
| **Jumlah** | **52.719** | **52.572** | **Total** |

## 22. Beban yang Masih Harus Dibayar / 22. Accrued Expenses

Beban yang masih harus dibayar merupakan beban yang masih harus dibayar atas beban bunga dan beban syariah sebagai berikut:

Accrued expenses consist of accrued expenses of interest and sharia expenses as follows:

| | 2024 | 2023 | |
|---|---|---|---|
| Pihak berelasi (Catatan 37) | | | Related parties (Note 37) |
| Rupiah | | | Rupiah |
| Deposito | 1.147 | 1.051 | Time deposits |
| Giro | 346 | 349 | Demand deposits |
| Tabungan | 42 | 16 | Savings deposits |
| Jumlah | 1.535 | 1.416 | Subtotal |
| Mata uang asing (Catatan 39) | | | Foreign currencies (Note 39) |
| Deposito | 3 | 341 | Time deposits |
| Giro | 109 | 45 | Demand deposits |
| Jumlah | 112 | 386 | Subtotal |
| Jumlah pihak berelasi | 1.647 | 1.802 | Total related parties |
| Pihak ketiga | | | Third parties |
| Rupiah | | | Rupiah |
| Deposito | 31.455 | 29.921 | Time deposits |
| Tabungan | 1.236 | 1.477 | Savings deposits |
| Giro | 1.807 | 1.273 | Demand deposits |
| Obligasi subordinasi | 7.583 | 7.583 | Subordinated bonds |
| Jumlah | 42.081 | 40.254 | Subtotal |
| Mata uang asing (Catatan 39) | | | Foreign currencies (Note 39) |
| Deposito | 385 | 1.753 | Time deposits |
| Giro | 103 | 7 | Demand deposits |
| Jumlah | 488 | 1.760 | Subtotal |
| Jumlah pihak ketiga | 42.569 | 42.014 | Total third parties |
| **Jumlah** | **44.216** | **43.816** | **Total** |

## 23. Liabilitas Lain-lain / 23. Other Liabilities

| | 2024 | 2023 | |
|---|---|---|---|
| Setoran jaminan | 176.743 | 157.425 | Margin deposits |
| Liabilitas sewa | 129.916 | 133.368 | Lease liabilities |
| Pendapatan yang ditangguhkan | 24.124 | 22.945 | Deferred income |
| Penilaian pajak penghasilan | 19.746 | - | Income tax assessment |
| Liabilitas terkait asuransi kredit | 13.580 | 23.005 | Liability related to insurance credit |
| Estimasi kerugian komitmen dan kontinjensi | 8.803 | 7.640 | Estimated losses on commitment and contingencies |
| Liabilitas sehubungan dengan pinjaman | 2.381 | 4.028 | Liabilities in connection with loans |
| Liabilitas derivatif (Catatan 16) | 1.746 | 3.235 | Derivatives liabilities (Note 16) |
| Setoran penyelesaian hapus buku | 1.021 | 731 | Deposit for write-off settlement |
| Setoran penyelesaian AYDA | 168 | 306 | Deposit for foreclosed assets settlement |
| Titipan setoran pajak ke KPPN | 114 | 3.871 | Deposit tax payments to the KPPN |
| Penampungan cadangan biaya *spin-off* | - | 11.851 | Escrow for spin-off costs |
| Lain-lain | 21.191 | 22.568 | Others |
| **Jumlah** | **399.533** | **390.973** | **Total** |

Perubahan estimasi kerugian komitmen dan kontinjensi adalah sebagai berikut:

The changes in estimated losses on commitment and contingencies are as follows:

| | 2024 | | | | |
|---|---|---|---|---|---|
| | Tahap 1/ *Stage 1* | Tahap 2/ *Stage 2* | Tahap 3/ *Stage 3* | Jumlah/ *Total* | |
| Saldo awal tahun | 7.553 | 33 | 54 | 7.640 | Balance at the beginning of the year |
| Pembentukan (pemulihan) tahun berjalan | 1.238 | (28) | (47) | 1.163 | Provision (reversal) for current year |
| Saldo akhir tahun | 8.791 | 5 | 7 | 8.803 | Balance at the end of the year |

| | 2023 | | | | |
|---|---|---|---|---|---|
| | Tahap 1/ *Stage 1* | Tahap 2/ *Stage 2* | Tahap 3/ *Stage 3* | Jumlah/ *Total* | |
| Saldo awal tahun | 12.567 | 32 | 22 | 12.621 | Balance at the beginning of the year |
| Pembentukan (pemulihan) tahun berjalan | (5.014) | 1 | 32 | (4.981) | Provision (reversal) for current year |
| Saldo akhir tahun | 7.553 | 33 | 54 | 7.640 | Balance at the end of the year |

## 24. Obligasi Subordinasi / 24. Subordinated Bonds

Merupakan obligasi subordinasi yang diterbitkan oleh Perusahaan dengan rincian sebagai berikut:

These represent subordinated bonds issued by the Company with the following details:

| | 2024 | 2023 | |
|---|---|---|---|
| Obligasi subordinasi Bank Sinarmas Tahap I Tahun 2022 | 500.000 | 500.000 | Bank Sinarmas subordinated bonds Phase I of 2022 |
| Diskonto yang belum diamortisasi | (2.495) | (3.488) | Unamortized discount |
| **Jumlah - bersih** | **497.505** | **496.512** | **Total - net** |

Pada tanggal 29 Juni 2022, Grup menerbitkan Obligasi Subordinasi Berkelanjutan I Bank Sinarmas Tahap I Tahun 2022 sebesar Rp500.000. Obligasi subordinasi ini berjangka waktu 5 tahun yang akan jatuh tempo pada tanggal 8 Juli 2027. Tingkat suku bunga sebesar 6,50% per tahun dan dibayarkan setiap tiga bulan sejak tanggal emisi.

On June 29, 2022, the Group issued Bank Sinarmas Phase I Year 2022 Subordinated Sustainable Bonds of Rp500,000. This subordinated bond has a term of 5 years and will mature on July 8, 2027. The interest rate is 6.50% per annum and is paid quarterly from the issuance date.

Dana yang diperoleh dari hasil Penawaran Umum Berkelanjutan Obligasi Subordinasi Berkelanjutan I Bank Sinarmas Tahap I Tahun 2022 setelah dikurangi dengan biaya-biaya emisi terkait, seluruhnya akan dipergunakan oleh Perusahaan untuk memperkuat permodalan yang diperhitungkan sebagai modal pelengkap (*Tier* 2) dalam rangka mendukung rencana penyaluran kredit dengan tenor yang lebih panjang.

The funds obtained from the proceeds from the Public Offering of the Sustainable Subordinated Bonds I of Bank Sinarmas Phase I Year 2022 after deducted by the related issuance costs, will all be used by the Company to strengthen it's capital which is calculated as supplementary capital (Tier 2) in the context of support plans for extending loans with longer tenors.

Pada Desember 2022, Perusahaan telah menggunakan seluruh dana hasil Penawaran Umum Berkelanjutan Obligasi Subordinasi I untuk penyaluran kredit dengan tenor panjang.

In December 2022, the Company has used all of the proceeds from the Public Offering of Subordinated Bonds I for long term lending.

PT BPD Jawa Barat dan Banten Tbk bertindak sebagi Wali Amanat.

PT BPD Jawa Barat dan Banten Tbk act as the Trustee.

Grup wajib mengupayakan tingkat kesehatan Grup minimal berada dalam peringkat komposit 3 (tiga) yang tergolong "Cukup Baik", sesuai penilaian internal berdasarkan ketentuan Otoritas Jasa Keuangan.

The Group is required to ensure that the minimum level of soundness of the Group has a composite rating of 3 (three) which is classified as "Fairly Good", according to internal assessment based on the provisions of the Financial Services Authority.

Melalui surat nomor RC-005/KRI-DIR/III/2024 tanggal 25 Maret 2024, PT Kredit Rating Indonesia memutuskan peringkat atas Obligasi Subordinasi Berkelanjutan I Bank Sinarmas sebanyak-banyaknya sebesar Rp3.000.000.000.000 (tiga triliun Rupiah) di *ir*A untuk periode 25 Maret 2024 sampai dengan 1 April 2025.

Based on PT Kredit Rating Indonesia Letter No. RC-005/KRI-DIR/III/2024 dated March 25, 2024, Bank Sinarmas' Subordinated Bonds I Phase I Year 2022 in the amount of up to Rp3,000,000,000,000 (three trillion Rupiah) received an *irA* (Single A) rating for the period from March 25, 2024 to April 1, 2025.

## 25. Dana Syirkah Temporer

Akun ini merupakan investasi tidak terikat dalam bentuk giro mudharabah, tabungan mudharabah, deposito berjangka mudharabah dan sertifikat investasi mudharabah antarbank.

## 25. Temporary Syirkah Funds

This account represents unrestricted investment in the form of mudharabah demand deposit, mudharabah saving deposits, mudharabah time deposits and mudharabah interbank Investment certificate.

a. Simpanan

a. Deposits

| | 2024 | 2023 | |
|---|---|---|---|
| Giro mudharabah | 849.868 | 712.713 | Mudharabah demand deposits |
| Tabungan mudharabah | 2.381.155 | 1.922.081 | Mudharabah saving deposits |
| Deposito berjangka mudharabah | 3.691.526 | 4.368.757 | Mudharabah time deposit |
| **Jumlah** | **6.922.549** | **7.003.551** | **Total** |

**Giro mudharabah terdiri atas:** / **Mudharabah demand deposits consist of:**

| | 2024 | 2023 | |
|---|---|---|---|
| Rupiah | | | Rupiah |
| Pihak berelasi (Catatan 37) | 91.048 | 243.744 | Related parties (Note 37) |
| Pihak ketiga | 582.499 | 468.172 | Third parties |
| Jumlah | 673.547 | 711.916 | Subtotal |
| Mata uang asing (Catatan 39) | | | Foreign currencies (Note 39) |
| Pihak berelasi (Catatan 37) | 58 | 57 | Related parties (Note 37) |
| Pihak ketiga | 176.263 | 840 | Third parties |
| Jumlah | 176.321 | 897 | Subtotal |
| **Jumlah** | **849.868** | **712.813** | **Total** |

| | 2024 | 2023 | |
|---|---|---|---|
| | % | % | |
| Tingkat nisbah per tahun | | | Ratio level per annum |
| Rupiah | 0,10 - 6,25 | 0,00 - 5,75 | Rupiah |
| Mata uang asing | 0,50 - 2,00 | 0,50 - 2,00 | Foreign currencies |

Pada tanggal 31 Desember 2024 dan 2023, tidak ada saldo giro mudharabah yang diblokir dalam rangka jaminan piutang dan pembiayaan syariah.

There were no Mudharabah demand deposits blocked as guarantee the sharia receivables and sharia financing as of December 31, 2024 and 2023.

**Tabungan mudharabah terdiri atas:** / **Mudharabah saving deposits consist of:**

| | 2024 | 2023 | |
|---|---|---|---|
| Rupiah | | | Rupiah |
| Pihak berelasi (Catatan 37) | 34.601 | 24.961 | Related parties (Note 37) |
| Pihak ketiga | 2.344.110 | 1.895.553 | Third parties |
| Jumlah | 2.378.711 | 1.920.514 | Subtotal |
| Mata uang asing (Catatan 39) | | | Foreign currencies (Note 39) |
| Pihak ketiga | 2.444 | 1.567 | Third parties |
| **Jumlah** | **2.381.155** | **1.922.081** | **Total** |

| | 2024 | 2023 | |
|---|---|---|---|
| | % | % | |
| Tingkat nisbah per tahun | | | Ratio level per annum |
| Rupiah | 0,00 - 7,00 | 0,00 - 7,00 | Rupiah |
| Mata uang asing | 0,00 - 0,50 | 0,50 | Foreign currencies |

Pada tanggal 31 Desember 2024 dan 2023, tidak ada saldo tabungan mudharabah yang diblokir dalam rangka jaminan piutang dan pembiayaan syariah.

There were no mudharabah saving deposits blocked as guarantee the sharia receivables and sharia financing as of December 31, 2024 and 2023.

**Deposito berjangka mudharabah terdiri atas:** / **Mudharabah time deposits consist of:**

| | 2024 | 2023 | |
|---|---|---|---|
| Pihak berelasi (Catatan 37) | | | Related Parties (Notes 37) |
| Rupiah | 69.316 | 630.352 | Rupiah |
| Mata uang asing (Catatan 39) | 966 | - | Foreign currencies (Note 39) |
| Jumlah | 70.282 | 630.352 | Subtotal |
| Pihak ketiga | | | Third Parties |
| Rupiah | 3.607.836 | 3.736.177 | Rupiah |
| Mata uang asing (Catatan 39) | 13.408 | 2.228 | Foreign currencies (Note 39) |
| Jumlah | 3.621.244 | 3.738.405 | Subtotal |
| **Jumlah** | **3.691.526** | **4.368.757** | **Total** |

Klasifikasi deposito berjangka mudharabah berdasarkan jangka waktu dan sisa umur saldo saat jatuh tempo adalah sebagai berikut:

The classification of mudharabah time deposits based on contract period and remaining period to maturity are as follows:

Berdasarkan periode deposito berjangka:

Based on contractual maturity:

| | 2024 | | | 2023 | | | |
|---|---|---|---|---|---|---|---|
| | Pihak berelasi (Catatan 37)/ *Related parties (Note 37)* | Pihak ketiga/ *Third parties* | Jumlah/ *Total* | Pihak berelasi (Catatan 37)/ *Related parties (Note 37)* | Pihak ketiga/ *Third parties* | Jumlah/ *Total* | |
| Rupiah | | | | | | | Rupiah |
| Kurang dari 1 bulan | - | 65.160 | 65.160 | - | 2.136 | 2.136 | Less than 1 month |
| 1 bulan | 57.766 | 438.100 | 495.866 | 569.931 | 957.149 | 1.527.080 | 1 month |
| 3 bulan | 11.550 | 852.454 | 864.004 | 60.410 | 886.965 | 947.375 | 3 months |
| 6 bulan | - | 2.014.372 | 2.014.372 | - | 1.696.032 | 1.696.032 | 6 months |
| 12 bulan | - | 237.750 | 237.750 | 11 | 193.895 | 193.906 | 12 months |
| Jumlah | 69.316 | 3.607.836 | 3.677.152 | 630.352 | 3.736.177 | 4.366.529 | Subtotal |
| Mata uang asing (Catatan 39) | | | | | | | Foreign currencies (Note 39) |
| 1 bulan | 966 | 7.569 | 8.535 | - | 323 | 323 | 1 month |
| 3 bulan | - | 1.070 | 1.070 | - | 339 | 339 | 3 months |
| 6 bulan | - | 4.249 | 4.249 | - | 1.061 | 1.061 | 6 months |
| 12 bulan | - | 520 | 520 | - | 505 | 505 | 12 months |
| Jumlah | 966 | 13.408 | 14.374 | - | 2.228 | 2.228 | Subtotal |
| **Jumlah** | **70.282** | **3.621.244** | **3.691.526** | **630.352** | **3.738.405** | **4.368.757** | **Total** |

Berdasarkan sisa umur sampai dengan saat jatuh tempo:

Based on remaining period to maturity:

| | 2024 | | | 2023 | | | |
|---|---|---|---|---|---|---|---|
| | Pihak berelasi (Catatan 37)/ *Related parties (Note 37)* | Pihak ketiga/ *Third parties* | Jumlah/ *Total* | Pihak berelasi (Catatan 37)/ *Related parties (Note 37)* | Pihak ketiga/ *Third parties* | Jumlah/ *Total* | |
| Rupiah | | | | | | | Rupiah |
| 1 bulan atau kurang | 69.266 | 938.757 | 1.008.023 | 569.931 | 1.186.516 | 1.756.447 | 1 month or less |
| 1 - 3 bulan | 50 | 1.126.600 | 1.126.650 | 60.421 | 842.926 | 903.347 | 1 - 3 months |
| 3 - 6 bulan | - | 1.390.512 | 1.390.512 | - | 1.571.592 | 1.571.592 | 3 - 6 months |
| 6 - 12 bulan | - | 151.967 | 151.967 | - | 135.143 | 135.143 | 6 - 12 months |
| Jumlah | 69.316 | 3.607.836 | 3.677.152 | 630.352 | 3.736.177 | 4.366.529 | Subtotal |
| Mata uang asing (Catatan 39) | | | | | | | Foreign currencies (Note 39) |
| 1 bulan atau kurang | 966 | 7.972 | 8.938 | - | 1.058 | 1.058 | 1 month or less |
| 1 - 3 bulan | - | 4.282 | 4.282 | - | 665 | 665 | 1 - 3 months |
| 3 - 6 bulan | - | 874 | 874 | - | 460 | 460 | 3 - 6 months |
| 6 - 12 bulan | - | 280 | 280 | - | 45 | 45 | 6 - 12 months |
| Jumlah | 966 | 13.408 | 14.374 | - | 2.228 | 2.228 | Subtotal |
| **Jumlah** | **70.282** | **3.621.244** | **3.691.526** | **630.352** | **3.738.405** | **4.368.757** | **Total** |

| | 2024 | 2023 | |
|---|---|---|---|
| | % | % | |
| Tingkat nisbah per tahun | | | Ratio level per annum |
| Rupiah | 0,00 - 7,00 | 1,00 - 6,75 | Rupiah |
| Mata uang asing | 0,00 - 4,75 | 0,50 - 2,75 | Foreign currencies |

Saldo deposito berjangka mudharabah yang diblokir dalam rangka jaminan piutang/pembiayaan syariah dan bank garansi pada tanggal 31 Desember 2024 dan 2023, masing-masing adalah sebesar Rp8.095 dan Rp25.093.

Total mudharabah time deposits were blocked as guarantee receivables/sharia financing and bank guarantee as of December 31, 2024 and 2023, amounted to Rp8,095 and Rp25,093, respectively.

b. Simpanan dari Bank Lain

b. Deposits from Other Banks

| | 2024 | 2023 | |
|---|---|---|---|
| Rupiah | | | Rupiah |
| Pihak ketiga | | | Third parties |
| Giro mudharabah | 1.472 | 14.769 | Mudharabah demand deposits |
| Deposito berjangka mudharabah | 1.500 | 1.000 | Mudharabah time deposits |
| **Jumlah** | **2.972** | **15.769** | **Total** |

| | 2024 | 2023 | |
|---|---|---|---|
| | % | % | |
| Tingkat bagi hasil rata-rata per tahun | | | Revenue sharing per annum |
| Rupiah | 0,00 - 4,25 | 0,00 - 0,50 | Rupiah |

## 26. Kepentingan Non-Pengendali

Perubahan kepentingan non-pengendali atas aset bersih Entitas Anak sebagai berikut:

## 26. Non-Controlling Interests

The change in non-controlling interests in the net assets of the Subsidiary is as follows:

| | 2024 | 2023 | |
|---|---|---|---|
| Saldo awal | - | - | Beginning balance |
| Dampak Pemisahan Unit Usaha Syariah | 487.890 | - | Effect of Spin-Off Sharia Unit |
| Bagian kepentingan non-pengendali atas laba bersih Entitas Anak | 79.292 | - | Non-controlling interest on net profit of Subsidiary |
| **Saldo akhir** | **567.182** | **-** | **Ending balance** |

## 27. Modal Saham dan Tambahan Modal Disetor

Susunan pemegang saham Grup pada tanggal 31 Desember 2024 dan 2023 sebagai berikut:

## 27. Capital Stock and Additional Paid-in Capital

The details of the Group's capital stock and stockholders as at December 31, 2024 and 2023 are as follows:

| | 2024 | | | |
|---|---|---|---|---|
| Pemegang Saham | Jumlah Lembar Saham/ *Number of Shares* | Persentase Kepemilikan/ *Percentage of Ownership* | Jumlah Modal Disetor/ *Total Paid-up Capital Stock* | Name of Stockholders |
| | | % | Rp | |
| PT Sinar Mas Multiartha Tbk | 11.826.853.600 | 59,99% | 1.182.685 | PT Sinar Mas Multiartha Tbk |
| PT Shinta Utama | 337.924.345 | 1,71% | 33.792 | PT Shinta Utama |
| Enny Kamal, Direktur | 1.683.501 | 0,01% | 168 | Enny Kamal, Director |
| Masyarakat | 7.549.700.957 | 38,29% | 754.971 | Public |
| **Jumlah** | **19.716.162.403** | **100,00%** | **1.971.616** | **Total** |

| | 2023 | | | |
|---|---|---|---|---|
| Pemegang Saham | Jumlah Lembar Saham/ *Number of Shares* | Persentase Kepemilikan/ *Percentage of Ownership* | Jumlah Modal Disetor/ *Total Paid-up Capital Stock* | Name of Stockholders |
| | | % | Rp | |
| PT Sinar Mas Multiartha Tbk | 11.826.853.600 | 59,99% | 1.182.685 | PT Sinar Mas Multiartha Tbk |
| PT Shinta Utama | 577.504.296 | 2,93% | 57.750 | PT Shinta Utama |
| Halim, Direktur | 612.146 | 0,00% | 61 | Halim, Director |
| Enny Kamal, Direktur | 1.795.332 | 0,01% | 180 | Enny Kamal, Director |
| Masyarakat | 7.309.397.029 | 37,07% | 730.940 | Public |
| **Jumlah** | **19.716.162.403** | **100,00%** | **1.971.616** | **Total** |

PT Shinta Utama dan PT Sinar Mas Multiartha, Tbk telah menandatangani dan menyampaikan surat pernyataan kesanggupan untuk memenuhi persyaratan yang ditetapkan dalam keikutsertaan Grup dalam program penjaminan Pemerintah.

PT Shinta Utama and PT Sinar Mas Multiartha, Tbk have signed and conveyed letters of statement on the recognition of the Group's liabilities as required in the Group's participation in the Government guarantee program.

Perubahan lembar saham untuk periode dan tahun yang berakhir 31 Desember 2024 dan 2023, adalah sebagai berikut:

The changes in number of outstanding shares for the period and the year ended December 31, 2024 and 2023, are as follows:

| | **Jumlah Saham/ *Number of shares issued*** | |
|---|---|---|
| Jumlah saham pada tanggal 1 Januari 2024 dan 31 Desember 2024 | 19.716.162.403 | Balance of shares as of January 1, 2024 and December 31, 2024 |
| Penambahan modal disetor selama tahun berjalan | - | Additional issuance during the year |
| Jumlah saham pada tanggal 31 Desember 2024 | 19.716.162.403 | Balance of shares as of December 31, 2024 |

Perubahan tambahan modal disetor sampai dengan tanggal 31 Desember 2024 dan 2023:

The movements in additional paid-in capital until December 31, 2024 and 2023 are as follows:

| | **2024** | **2023** | |
|---|---|---|---|
| Penawaran Umum Perdana tahun 2010 | 80.000 | 80.000 | Initial Public Offering in 2010 |
| Biaya emisi saham tahun 2010 | (4.678) | (4.678) | Shares issuance cost in 2010 |
| Konversi Waran Seri I tahun 2011 | 89.918 | 89.918 | Conversion of Series I Warrants in 2011 |
| Konversi Waran Seri I tahun 2012 | 90 | 90 | Conversion of Series I Warrants in 2012 |
| Penawaran Umum Terbatas I tahun 2012 | 180.478 | 180.478 | Limited Public Offering I in 2012 |
| Biaya emisi saham tahun 2012 | (3.776) | (3.776) | Shares issuance cost in 2012 |
| Konversi Waran Seri I tahun 2013 | 371 | 371 | Conversion of Series I Warrants in 2013 |
| Konversi Waran Seri II tahun 2013 | 423.821 | 423.821 | Conversion of Series II Warrants in 2013 |
| Konversi Waran Seri I tahun 2014 | 935 | 935 | Conversion of Series I Warrants in 2014 |
| Konversi Waran Seri II tahun 2014 | 1.151 | 1.151 | Conversion of Series II Warrants in 2014 |
| Peningkatan modal tanpa Hak Memesan Efek Terlebih Dahulu (HMETD) | 152.411 | 152.411 | Additional issuance through right issue without pre-emptive rights to the existing shareholders |
| Biaya emisi saham tahun 2014 | (227) | (227) | Shares issuance cost in 2014 |
| Konversi Waran Seri I | 4.397 | 4.397 | Conversion of Series I Warrants |
| Konversi Waran Seri II | 3.313 | 3.313 | Conversion of Series II Warrants |
| Konversi Waran Seri II | 1.576 | 1.576 | Conversion of Series II Warrants |
| Penawaran Umum Terbatas II tahun 2016 | 326.782 | 326.782 | Limited Public Offering I in 2016 |
| Selisih antara aset dan liabiltas pengampunan pajak | 5.234 | 5.234 | Difference between tax amnesty assets and liabilities |
| Biaya emisi saham tahun 2016 | (5.285) | (5.285) | Shares issuance cost in 2016 |
| Konversi Waran Seri II | 19.264 | 19.264 | Conversion of Series II Warrants |
| Konversi Waran Seri III | 880 | 880 | Conversion of Series III Warrants |
| Konversi Waran Seri III tahun 2019 | 840.000 | 840.000 | Conversion of Series III Warrants in 2019 |
| Konversi Waran Seri III tahun 2020 | 252.000 | 252.000 | Conversion of Series III Warrants in 2020 |
| Konversi Waran Seri III tahun 2022 | 1.183.539 | 1.183.539 | Conversion of Series III Warrants in 2022 |
| **Jumlah** | **3.552.194** | **3.552.194** | **Total** |

**Manajemen Permodalan**

Tujuan utama dari pengelolaan modal Grup adalah untuk memastikan bahwa Grup mempertahankan rasio modal yang sehat dalam rangka mendukung bisnis dan memaksimalkan nilai pemegang saham. Grup wajib untuk memenuhi rasio Kewajiban Penyediaan Modal Minimum (KPMM) sebagaimana ditetapkan oleh OJK.

**Capital Management**

The primary objective of the Grup's capital management is to ensure that it maintains the soundness of capital ratios in order to support its business and maximize shareholder value. The Grup is required by OJK to meet Capital Adequacy Ratio (CAR).

Manajemen menggunakan peraturan rasio permodalan untuk memantau rasio Kewajiban Penyediaan Modal Minimum (KPMM), sesuai dengan standar industri. Peraturan OJK untuk pengukuran modal tersebut terutama didasarkan kepada pemantauan kebutuhan modal yang diwajibkan (diukur sebagai 10% dari aset tertimbang menurut risiko) terhadap modal yang tersedia.

Management uses regulatory capital ratios in order to monitor its capital base, and these Capital Adequacy Ratios (CAR) remain the industry standards for measuring capital adequacy. OJK regulation for such measurement is primarily based on monitoring the capital requirement (measured as 10% of risk-weighted assets) to available capital resources.

Grup telah memenuhi ketentuan OJK yang berlaku tentang KPMM.

The Group has complied with OJK regulation regarding CAR.

Grup wajib memperhitungkan Risiko Pasar karena telah memenuhi kriteria sebagaimana diatur oleh OJK yang berlaku, yaitu jumlah aset sebesar Rp10.000.000 atau lebih. Perhitungan dilakukan menggunakan metode standar sesuai dengan Peraturan OJK.

In the calculations of CAR, the Group has considered Market Risk using the standard method as stipulated in OJK Regulation, since the Group has a total assets of more than Rp10,000,000.

Perhitungan rasio KPMM pada tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut:

The calculation of CAR as at December 31, 2024 and 2023 follows:

| | 2024 | 2023 | |
|---|---|---|---|
| I. Komponen Modal | | | I. Capital Stock Component |
| A. Modal Inti | 6.930.875 | 7.283.216 | A. Core Capital |
| B. Modal Pelengkap | 641.610 | 711.607 | B. Supplementary Capital |
| II. Jumlah modal | 7.572.485 | 7.994.823 | II. Total Capital Stock |
| III. Aset Tertimbang Menurut Risiko (ATMR) | | | III. Risk Weighted Assets |
| Risiko kredit setelah memperhitungkan risiko spesifik | 14.517.860 | 20.197.024 | Credit risk after considering spesific risk |
| Risiko pasar | 2.981.680 | 4.118.159 | Market risk |
| Risiko operasional | 6.723.016 | 7.237.461 | Operational risk |
| Jumlah ATMR untuk risiko kredit, pasar dan operasional | 24.222.556 | 31.552.644 | Total risk weight assets for credit, market and operational risk |
| IV. Rasio Kewajiban Penyediaan Modal Minimum (KPMM) yang tersedia | | | IV. Capital Adequacy Ratio (CAR) |
| KPMM dengan memperhitungkan risiko kredit | 52,16% | 39,58% | CAR with credit risk |
| KPMM dengan memperhitungkan risiko kredit dan pasar | 43,27% | 32,87% | CAR with credit and market risk |
| KPMM dengan memperhitungkan risiko kredit dan operasional | 35,65% | 29,14% | CAR with credit and operational risk |
| KPMM dengan memperhitungkan risiko kredit dan operasional dan pasar | 31,26% | 25,34% | CAR with credit, operational and market risk |
| V. Rasio Kewajiban Penyediaan Modal Minimum yang diwajibkan berdasarkan profil risiko | 10% | 10% | V. Minimum Capital Adequacy Ratio based on the profile risk |

## 28. Waran

Pada tanggal 27 April 2016, Grup menerbitkan Waran Seri III secara cuma-cuma sejumlah 4.357.096.148 waran yang melekat pada saham yang diterbitkan dalam rangka Penawaran Umum Terbatas II. Setiap pemegang satu (1) saham baru Grup berhak memperoleh empat (4) waran dimana setiap satu (1) waran memberikan hak kepada pemegangnya untuk membeli satu (1) saham baru Grup dengan harga pelaksanaannya sebesar Rp625 (dalam Rupiah penuh) dan dapat dikonversi menjadi saham mulai tanggal 28 November 2016 sampai dengan 12 Mei 2021.

Tanggal masa laku Waran Seri III berakhir pada 12 Mei 2021 dan sebanyak 21.031.543 Waran Seri III tidak dikonversikan menjadi saham.

## 28. Warrants

On April 27, 2016, the Group issued attached 4,357,096,148, Series III Warrants, free of charge, to be issued in the Limited Public Offering II. Each holder of one (1) new shares of the Group is entitled to four (4) warrants where each one (1) warrant entitles the holder to purchase one (1) new share of the Group at an exercise price a Rp625 (in full Rupiah) per share and can be exercised from November 28, 2016 until May 12, 2021.

The validity period of the Series III Warrants ended on May 12, 2021 and 21,031,543 Series III Warrants were not converted into shares.

## 29. Pendapatan Bunga dan Pendapatan Syariah / 29. Interest Revenues and Sharia Income

| | 2024 | 2023 | |
|---|---|---|---|
| Pendapatan bunga | | | Interest revenues |
| Rupiah | | | Rupiah |
| Kredit yang diberikan | 1.539.973 | 1.174.841 | Loans |
| Efek-efek | 971.883 | 1.041.086 | Securities |
| Penempatan pada bank lain dan Bank Indonesia | 155.235 | 158.097 | Placements with other banks and Bank Indonesia |
| Giro pada bank lain dan Bank Indonesia | 19.923 | 21.156 | Demand deposits with other banks and Bank Indonesia |
| Efek yang dibeli dengan janji jual kembali | 10.836 | 39.962 | Securities purchased under agreements to resell |
| Jumlah | 2.697.850 | 2.435.142 | Subtotal |
| Mata uang asing | | | Foreign currencies |
| Penempatan pada bank lain dan Bank Indonesia | 187.513 | 173.371 | Placements with other banks and Bank Indonesia |
| Kredit yang diberikan | 47.198 | 137.995 | Loans |
| Efek-efek | 76.201 | 25.893 | Securities |
| Giro pada bank lain dan Bank Indonesia | 10.151 | 9.394 | Demand deposits with other banks and Bank Indonesia |
| Jumlah | 321.063 | 346.653 | Subtotal |
| Jumlah pendapatan bunga | 3.018.913 | 2.781.795 | Total interest revenues |
| Pendapatan syariah | | | Sharia income |
| Rupiah | | | Rupiah |
| Piutang dan pembiayaan syariah | 477.150 | 555.063 | Sharia receivables and sharia financing |
| Penempatan pada bank lain dan Bank Indonesia | 46.598 | 45.594 | Placements with other banks and Bank Indonesia |
| Efek-efek | 237.438 | 125.693 | Securities |
| Giro pada bank lain dan Bank Indonesia | 3.829 | - | Demand deposits with other banks and Bank Indonesia |
| Jumlah | 765.015 | 726.350 | Subtotal |
| Mata uang asing | | | Foreign currencies |
| Piutang dan pembiayaan syariah | 3.185 | - | Sharia receivables and sharia financing |
| Efek-efek | 654 | 699 | Securities |
| Penempatan pada bank lain dan Bank Indonesia | - | 6.967 | Placements with other banks and Bank Indonesia |
| Giro pada bank lain dan Bank Indonesia | 1.136 | - | Demand deposits with other banks and Bank Indonesia |
| Jumlah | 4.975 | 7.666 | Subtotal |
| Jumlah pendapatan syariah | 769.990 | 734.016 | Total sharia income |
| **Jumlah** | **3.788.903** | **3.515.811** | **Total** |

## 30. Beban Bunga dan Beban Syariah / 30. Interest Expenses and Sharia Expenses

| | 2024 | 2023 | |
|---|---|---|---|
| Beban bunga | | | Interest expenses |
| Rupiah | | | Rupiah |
| Deposito berjangka | 335.289 | 269.162 | Time deposits |
| Tabungan | 184.166 | 117.592 | Savings deposits |
| Giro | 98.447 | 100.304 | Demand deposits |
| Premi penjaminan Pemerintah (Catatan 46c) | 96.764 | 80.800 | Premium on Government guarantee (Note 46c) |
| Obligasi subordinasi | 33.494 | 33.220 | Subordinated bonds |
| Simpanan dari bank lain | 19.891 | 7.210 | Deposits from other banks |
| Efek yang dijual dengan janji beli kembali | 38.021 | 5.605 | Securities sold under agreements to repurchase |
| Jumlah | 806.072 | 613.893 | Subtotal |
| Mata uang asing | | | Foreign currencies |
| Deposito berjangka | 18.575 | 10.194 | Time deposits |
| Giro | 4.501 | 8.819 | Demand deposits |
| Simpanan dari bank lain | 460 | 17 | Deposits from other banks |
| Jumlah | 23.536 | 19.030 | Subtotal |
| Jumlah beban bunga | 829.608 | 632.923 | Total interest expenses |
| Beban syariah | | | Sharia expenses |
| Rupiah | | | Rupiah |
| Deposito berjangka | 215.329 | 184.268 | Time deposits |
| Tabungan | 93.307 | 40.817 | Savings deposits |
| Giro | 26.432 | 16.032 | Demand deposits |
| Premi penjaminan Pemerintah (Catatan 46c) | 20.249 | 16.625 | Premium on Government guarantee (Note 46c) |
| Simpanan dari bank lain | 4.647 | 1.827 | Deposits from other banks |
| Efek yang dijual dengan janji beli kembali | 68 | - | Securities sold under agreements to repurchase |
| Jumlah | 360.032 | 259.569 | Subtotal |
| Mata uang asing | | | Foreign currencies |
| Giro | 324 | - | Demand deposits |
| Simpanan dari bank lain | 86 | - | Deposits from other banks |
| Deposito berjangka | 43 | - | Time deposits |
| Tabungan | 2 | - | Savings deposits |
| Jumlah | 455 | - | Subtotal |
| Jumlah beban syariah | 360.487 | 259.569 | Total sharia expenses |
| **Jumlah** | **1.190.095** | **892.492** | **Total** |

## 31. Beban Umum dan Administrasi / 31. General and Administrative Expenses

| | 2024 | 2023 | |
|---|---|---|---|
| Perbaikan dan pemeliharaan | 424.876 | 232.778 | Repairs and maintenance |
| Asuransi | 383.730 | 387.092 | Insurance |
| Umum | 288.076 | 264.636 | General |
| Komunikasi | 94.445 | 98.976 | Communications |
| Sewa gedung | 47.036 | 42.540 | Building rent |
| Promosi | 42.702 | 27.097 | Promotions |
| Transportasi | 33.304 | 34.710 | Transportation |
| Pendidikan dan pengembangan | 29.052 | 24.222 | Education and training |
| Imbalan kerja jangka panjang (Catatan 41) | 26.752 | 16.301 | Long term employee benefits (Note 41) |
| Jasa profesional | 25.749 | 8.920 | Professional fees |
| Cetakan dan alat tulis | 25.692 | 25.254 | Printing and stationery |
| Listrik dan air | 25.611 | 24.747 | Electricity and water |
| Perjalanan dinas | 9.747 | 8.926 | Travel |
| **Jumlah** | **1.456.772** | **1.196.199** | **Total** |

## 32. Beban Tenaga Kerja / 32. Personnel Expenses

| | 2024 | 2023 | |
|---|---|---|---|
| Gaji | 685.225 | 602.138 | Salaries |
| Tunjangan Hari Raya | 57.247 | 49.730 | Allowances for Hari Raya |
| Tunjangan lainnya | 540.037 | 367.097 | Other allowances |
| **Jumlah** | **1.282.509** | **1.018.965** | **Total** |

## 33. Pendapatan Operasional Lainnya - Lain-lain / 33. Other Operating Revenue - Others

| | 2024 | 2023 | |
|---|---|---|---|
| Pendapatan s*afe deposit box* | 7.877 | 7.651 | Income from safe deposit box |
| Keuntungan penjualan aset tetap (Catatan 13) | 690 | 694 | Gain on sale of property and equipment (Note 13) |
| Keuntungan penjualan AYDA | 11 | - | Gain on sale of foreclosed assets |
| Pendapatan dari klaim asuransi | - | 213.666 | Revenue from insurance claim |
| Lain-lain | 11.011 | 11.469 | Others |
| **Jumlah** | **19.589** | **233.480** | **Total** |

## 34. Beban Operasional Lainnya - Lain-lain / 34. Other Operating Expenses - Others

| | 2024 | 2023 | |
|---|---|---|---|
| Beban tanggung jawab sosial | 5.295 | 6.100 | Corporate social responsibilty |
| Biaya zakat, infaq, dan sedekah | 4.334 | - | Obligatory charities |
| Kerugian dari tindakan kecurangan | 2.495 | 6.695 | Loss from fraud |
| Kerugian penjualan AYDA | 1.323 | 1.167 | Loss on sale of foreclosed assets |
| Hapus buku aset tetap (Catatan 13) | 66 | 129 | Loss on the write-off of property and equipment (Note 13) |
| Kerugian penurunan nilai aset lain-lain | - | 37.344 | Impairment loss on other assets |
| Lain-lain | 2.125 | 5.441 | Others |
| **Jumlah** | **15.638** | **56.876** | **Total** |

## 35. Pajak Penghasilan / 35. Income Tax

a. Beban Pajak / a. Tax Expense

Beban pajak terdiri dari: / Tax expense consists of the following:

| | 2024 | 2023 | |
|---|---|---|---|
| Pajak kini - Bank | 51.896 | 78.960 | Current tax - Bank |
| Pajak kini - entitas anak | 42.254 | - | Current tax - subsidiary |
| Pajak tangguhan - Bank | (557) | (1.904) | Deferred tax - Bank |
| Pajak tangguhan - entitas anak | (24.914) | - | Deferred tax - subsidiary |
| Penyesuaian tahun lalu | - | (79.274) | Previous year adjustment |
| **Jumlah** | **68.679** | **(2.218)** | **Total** |

Penyesuaian tahun lalu merupakan penyesuaian atas beban pajak 2022.

The previous year adjustment is the adjustment to 2022 income tax.

b. Pajak Kini

Rekonsiliasi antara laba sebelum pajak menurut laporan laba rugi dan penghasilan komprehensif lain dengan laba kena pajak adalah sebagai berikut:

b. Current Tax

A reconcilliation between profit before tax per statements of profit or loss and other comprehensive income and taxable income as follow:

| | 2024 | 2023 | |
|---|---|---|---|
| Laba sebelum pajak menurut laporan laba rugi dan penghasilan komprehensif lain konsolidasian | 438.816 | 73.578 | Profit before tax consolidated per statements of profit and loss and other comprehensive income |
| Bagian laba (rugi) bersih entitas anak | 179.160 | - | Net income (loss) of subsidiaries |
| Laba sebelum pajak penghasilan - Bank | 259.656 | 73.578 | Income before income tax - Bank |
| Perbedaan temporer | 2.933 | 394.888 | Temporary difference |
| Perbedaan tetap | 10.548 | (52.888) | Permanent difference |
| Jumlah | 13.481 | 342.000 | Total |
| Laba kena pajak - Bank | 273.137 | 415.578 | Taxable Income - Bank |

Rincian beban dan utang pajak kini adalah sebagai berikut:

Current tax expense and payable are computed as follows:

| | 2024 | 2023 | |
|---|---|---|---|
| Beban pajak kini - Bank | 51.896 | 78.960 | Current tax expense - Bank |
| Beban pajak kini - entitas anak | 42.254 | - | Current tax expense - subsidiary |
| Dikurangi pembayaran pajak dimuka Pajak penghasilan pasal 25 - Bank | (49.348) | (56.283) | Less prepaid income tax - Article 25 - Bank |
| Dikurangi pembayaran pajak dimuka Pajak penghasilan pasal 25 - entitas anak | (39.401) | - | Less prepaid income tax - Article 25 - subsidiary |
| Utang pajak kini (Catatan 21) | 5.401 | 22.677 | Current tax payable (Note 21) |

c. Pajak Tangguhan

Rincian dari aset dan liabilitas pajak tangguhan Grup adalah sebagai berikut:

c. Deferred Tax

The details of the Group's deferred tax assets and liabilities are as follows:

| | 1 Januari 2024/ *January 1, 2024* | Penyesuaian saldo aset pajak tangguhan/ *Deffered tax asset adjustment* | Penyesuaian tarif pajak/ *Tax rate adjustment* | Dikreditkan (dibebankan) ke/ *Credited (charged) to* Laba Rugi/ *Profit or Loss* | Dikreditkan (dibebankan) ke/ *Credited (charged) to* Penghasilan Komprehensif Lain/ *Other Comprehensive Income* | 31 Desember 2024/ *December 31, 2024* | |
|---|---|---|---|---|---|---|---|
| Amortisasi diskonto instrumen keuangan | 524 | - | - | 154 | - | 678 | Amortization of discount of financial instrument |
| Imbalan kerja jangka panjang | 6.730 | (1.124) | - | 752 | 735 | 7.093 | Long-term employee benefit |
| Laba yang belum direalisasi atas kenaikan nilai wajar dari efek-efek yang diukur melalui penghasilan komprehensif lain | 28.233 | - | - | - | 21.110 | 49.343 | Unrealized gain of marketable securities on increase at fair value through other comprehensive income |
| Cadangan bonus | - | - | - | 8.268 | - | 8.268 | Bonus reserved |
| Penyusutan aset tetap | (112.052) | 1.994 | - | 10.673 | - | (99.385) | Depreciation of property and equipment |
| Aset hak-guna | 2.111 | - | - | 590 | - | 2.701 | Right-of-used assets |
| Cadangan kerugian penurunan nilai aset | 289.022 | (150.160) | - | (19.880) | - | 118.982 | Allowances for impairment losses on earning assets |
| **Aset pajak tangguhan - Bank - neto** | **214.568** | **(149.290)** | **-** | **557** | **21.845** | **87.680** | **Deferred tax assets - Bank - net** |
| **Aset pajak tangguhan - entitas anak - neto** | **-** | **149.290** | **23.572** | **1.342** | **(523)** | **173.681** | **Deferred tax assets - subsidiaries - net** |
| **Total** | **214.568** | **-** | **23.572** | **1.899** | **21.322** | **261.361** | **Total** |

| | 1 Januari 2023/ *January 1, 2023* | Dikreditkan (dibebankan) ke/ *Credited (charged) to* Laba Rugi/ *Profit or Loss* | Penghasilan Komprehensif Lain/ *Other Comprehensive Income* | 31 Desember 2023/ *December 31, 2023* | |
|---|---|---|---|---|---|
| Amortisasi diskonto instrumen keuangan | (13) | 537 | - | 524 | Amortization of discount of financial instrument |
| Imbalan kerja jangka panjang | 6.866 | (703) | 567 | 6.730 | Long-term employee benefit |
| Laba yang belum direalisasi atas kenaikan nilai wajar dari efek-efek yang diukur melalui penghasilan komprehensif lain | 13.022 | - | 15.211 | 28.233 | Unrealized gain of marketable securities on increase at fair value through other comprehensive income |
| Penyusutan aset tetap | (114.976) | 2.924 | - | (112.052) | Depreciation of property and equipment |
| Aset hak-guna | 3.770 | (1.659) | - | 2.111 | Right-of-used assets |
| Cadangan kerugian penurunan nilai aset | 288.217 | 805 | - | 289.022 | Allowances for impairment losses on earning assets |
| **Jumlah aset pajak tangguhan - bersih** | **196.886** | **1.904** | **15.778** | **214.568** | **Deferred tax assets - net** |

Rekonsiliasi antara beban pajak dan hasil perkalian laba akuntansi sebelum pajak dengan tarif pajak yang berlaku dalam laporan laba rugi dan penghasilan komprehensif lain adalah sebagai berikut:

A reconciliation between the total tax expense and the amounts computed by applying the effective tax rates to profit before tax per statements of profit loss and other comprehensive income follows:

| | 2024 | 2023 | |
|---|---|---|---|
| Laba sebelum beban pajak menurut laporan laba rugi dan penghasilan komprehensif lain konsoidasian | 438.816 | 73.578 | Profit before tax consolidated per statement of profit and loss and other comprehensive income |
| Beban pajak penghasilan dengan tarif pajak yang berlaku - Bank - 19% | 49.335 | 13.980 | Income tax expense at prevailing tax rate - bank - 19% |
| Beban pajak penghasilan dengan tarif pajak yang berlaku - Entitas anak - 22% | 39.415 | 0 | Income tax expense at prevailing tax rate - Subsidiary - 22% |
| Pengaruh pajak atas perbedaan tetap: | | | Tax effects of permanent differences: |
| Lain-lain | 3.501 | (10.049) | Others |
| Jumlah - bersih | 3.501 | (10.049) | Net |
| Koreksi atas beban pajak | (23.572) | (6.149) | Adjustment on income tax |
| **Jumlah beban pajak** | **68.679** | **(2.218)** | **Total tax expense** |

Pada tanggal 7 Oktober 2021, Dewan Perwakilan Rakyat Republikk Indonesia mengesahkan Undang-Undang Harmonisasi Peraturan Perpajakan, yang antara lain menetapkan tarif pajak penghasilan badan sebesar 22% untuk tahun pajak 2022 dan seterusnya

On October 7, 2021, the House of Representatives of the Republic of Indonesia passed the Law on the Harmonization of Tax Regulations, which stipulates a corporate income tax rate of 22% for the fiscal year 2022 onwards, among others.

Bank sebagai wajib pajak perusahaan publik dalam negeri dan memenuhi persyaratan tertentu sebagaimana diatur berdasarkan Peraturan Pemerintah, memperoleh tarif 3% lebih rendah dari tarif pajak penghasilan badan yang disebutkan di atas, yakni menjadi 19% pada tahun pajak 2024 dan 2023.

The Bank as a domestic public company tax payer which meeting certain requirements of Government Regulation, can avail of further 3% reduction from the tax rate as mentioned above, i.e., 19% for 2024 and 2023 fiscal years.

Aset dan liabilitas pajak tangguhan Grup tanggal 31 Desember 2024, telah dihitung menggunakan tarif pajak yang diperkirakan berlaku pada saat realisasi.

The Group's deferred tax assets and liabilities as of December 31, 2024, have been calculated using the tax rates that are estimated to be valid at the time of realization.

## 36. Laba per Saham Dasar / 36. Earnings per Share

| | 2024 | 2023 | |
|---|---|---|---|
| Laba bersih | 290.845 | 75.796 | Net income |
| Rata-rata tertimbang jumlah saham untuk perhitungan laba per saham dasar | 19.716.162.403 | 19.716.162.403 | Weighted average number of shares outstanding for computation of basic earnings per share |
| Laba bersih per saham (dalam Rupiah penuh) | 14,75 | 3,84 | Earnings per share (in full Rupiah) |

## 37. Sifat dan Transaksi Pihak Berelasi / 37. Nature of Relationship and Transactions with Related Parties

### Sifat Pihak Berelasi / Nature of Relationship

Selain karyawan kunci, pihak berelasi dengan Bank adalah perusahaan-perusahaan yang berada dalam Grup Sinar Mas:

a. Pemegang saham (termasuk pemegang saham akhir) Bank. PT Sinarmas Multiartha Tbk dan PT Shinta Utama.
b. Perusahaan-perusahaan yang dimiliki secara langsung atau tidak langsung oleh pemegang saham Bank.
c. Perusahaan-perusahaan yang dikendalikan oleh anggota keluarga dekat pemegang saham dan manajemen kunci Bank.

Other than the key management personnel, the related parties of the Bank represent companies under the Sinar Mas Group:

a. Stockholders (include ultimate stockholder). PT Sinarmas Multiartha Tbk and PT Shinta Utama.
b. Companies owned by stockholders, either directly or indirectly.
c. Companies controlled by close family members of stockholders and key management personnel.

### Transaksi Pihak Berelasi / Transactions with of Related Parties

Dalam kegiatan usahanya, Bank juga melakukan transaksi-transaksi tertentu dengan pihak-pihak berelasi yang meliputi antara lain:

In the normal course of business, the Bank entered into certain transactions with related parties involving the following:

a. Transaksi aset dan liabilitas dengan pihak berelasi adalah sebagai berikut:

a. Accounts involved in transactions with related parties are as follows:

| | 2024 | | 2023 | | |
|---|---|---|---|---|---|
| | Jumlah/ *Total* | Persentase Terhadap Jumlah Aset/Liabilitas/ Dana Syirkah Temporer Percentage of Total Assets/Liabilities/ Syirkah Temporary Funds % | Jumlah/ *Total* | Persentase Terhadap Jumlah Aset/Liabilitas/ Dana Syirkah Temporer Percentage of Total Assets/Liabilities/ Syirkah Temporary Funds % | |
| **Aset** | | | | | **Assets** |
| Efek-efek | 1.079.140 | 1,94 | 1.140.803 | 2,17 | Securities |
| Kredit | 297.395 | 0,53 | 211.039 | 0,40 | Loans |
| Pendapatan yang masih akan diterima | 143 | 0,00 | 212 | 0,00 | Accrued income |
| Biaya dibayar dimuka | 4.280 | 0,01 | 400 | 0,00 | Prepaid expenses |
| Aset lain - lain | 35.584 | 0,06 | 39.103 | 0,07 | Other assets |
| **Liabilitas** | | | | | **Liabilities** |
| Liabilitas segera | 314 | 0,00 | 1.535 | 0,00 | Liabilities immediately payable |
| Simpanan | 5.634.290 | 14,05 | 5.918.217 | 15,66 | Deposits |
| Beban yang masih harus dibayar | 1.647 | 0,00 | 1.802 | 0,00 | Accrued expenses |
| **Dana Syirkah Temporer** | | | | | **Temporary Syirkah Funds** |
| Simpanan | 195.989 | 2,83 | 899.014 | 12,81 | Deposits |

b. Pada tanggal 31 Desember 2024 dan 2023, saldo kredit *channeling* masing-masing sebesar Rp156.719 dan Rp38.965 dan saldo kredit *joint financing* masing-masing sebesar Rp1.796.958 dan Rp2.586.684 disalurkan melalui pihak berelasi (Catatan 9).

b. As of December 31, 2024 and 2023, loan channeling amounted to Rp156,719 and Rp38,965, respectively, and joint financing amounted to Rp1,796,958 and Rp2,586,684, respectively, were disbursed through related parties (Note 9).

c. Pada tanggal 31 Desember 2024 dan 2023, saldo aset ijarah *channeling* masing-masing sebesar Rpnihil dan Rp137.658 disalurkan melalui pihak berelasi.

c. As of December 31, 2024 and 2023, ijarah assets channeling amounted to Rpnil and Rp137,658, respectively, were disbursed through related parties.

d. Pendapatan bunga dan pendapatan syariah yang diterima dari pihak berelasi untuk tahun-tahun yang berakhir 31 Desember 2024 dan 2023 masing-masing sebesar Rp4.997 dan Rp6.870, atau masing-masing 0,15% dan 0,23% dari jumlah pendapatan bunga dan pendapatan syariah.

d. Interest income and sharia income from related parties amounted to Rp4,997 and Rp6,870, or 0.15% and 0.23%, respectively, of total interest income and sharia income for the years ended December 31, 2024 and 2023, respectively.

e. Beban bunga dan beban syariah yang dibayar kepada pihak berelasi untuk tahun-tahun yang berakhir 31 Desember 2024 dan 2023 masing-masing sebesar Rp89.732 dan Rp100.812, atau masing-masing 7,54% dan 11,30%, dari jumlah beban bunga dan beban syariah.

e. Interest expenses and sharia expenses paid to related parties amounted to Rp89,732 and Rp100,812 or 7.54% and 11.30%, respectively of total interest expense and sharia expenses for the years ended December 31, 2024 and 2023, respectively.

f. Beban umum dan administrasi yang dibayar kepada pihak berelasi untuk tahun-tahun yang berakhir 31 Desember 2024 dan 2023 masing-masing sebesar Rp29.925 dan Rp29.358 atau masing-masing 2,05% dan 2,45% dari jumlah beban umum dan administrasi.

f. General and administrative expenses incurred with related parties amounted to Rp29,925 and Rp29,358 or 2.05% and 2.45%, respectively, of total general and administrative expenses for the years ended December 31, 2024 and 2023, respectively.

g. Bank memberikan kompensasi kepada karyawan kunci. Imbalan yang diberikan kepada direksi dan anggota manajemen kunci lainnya selama tahun berjalan adalah sebagai berikut:

g. The Bank provides compensation to the key management personnel. The renumeration of directors and other members of key management during the year were as follows:

| | 2024 | | | | | | |
|---|---|---|---|---|---|---|---|
| | Direksi/ *Directors* | | Dewan Komisaris/ *Board of Commissioners* | | Personil manajemen kunci lainnya/ *Management Personnel* | | |
| | % | Rp | % | Rp | % | Rp | |
| Gaji dan imbalan kerja jangka pendek | 100,00 | 28.604 | 100,00 | 5.999 | 96,87 | 196.960 | Salaries and other short-term employee benefits |
| Imbalan pesangon | - | - | - | - | 3,13 | 6.371 | Termination benefits |
| Jumlah | 100,00 | 28.604 | 100,00 | 5.999 | 100,00 | 203.331 | Total |

| | 2023 | | | | | | |
|---|---|---|---|---|---|---|---|
| | Direksi/ *Directors* | | Dewan Komisaris/ *Board of Commissioners* | | Personil manajemen kunci lainnya/ *Management Personnel* | | |
| | % | Rp | % | Rp | % | Rp | |
| Gaji dan imbalan kerja jangka pendek | 100,00 | 29.824 | 100,00 | 5.802 | 96,07 | 197.852 | Salaries and other short-term employee benefits |
| Imbalan pesangon | - | - | - | - | 3,93 | 8.093 | Termination benefits |
| Jumlah | 100,00 | 29.824 | 100,00 | 5.802 | 100,00 | 205.945 | Total |

h. Pada tanggal 31 Desember 2024 dan 2023, saldo transaksi komitmen dan kontinjensi (berupa *letter of credit* dan bank garansi) dengan pihak berelasi masing-masing sebesar Rp114.779 dan Rp116.355 (Catatan 38). Saldo jaminan tunai dari pihak berelasi sehubungan dengan transaksi *letter of credit* dan bank garansi pada tanggal 31 Desember 2024 dan 2023 masing-masing sebesar Rp366.395 dan Rp366.935.

h. As of December 31, 2024 and 2023, the total commitments and contingent transactions (which consist of letters of credit and bank guarantees) with related parties amounted to Rp114,779 and Rp116,355, respectively (Note 38). The outstanding margin deposits from related parties relating to the letters of credit and bank guarantees amounted to Rp366,395 and Rp366,935 as of December 31, 2024 and 2023, respectively.

i. Pada tanggal 31 Desember 2024 dan 2023, aset tetap Bank, kecuali tanah diasuransikan kepada PT Asuransi Sinar Mas dengan nilai pertanggungan seluruhnya masing-masing sebesar Rp917.905 dan Rp963.472 (Catatan 13).

i. As of December 31, 2024 and 2023, all property and equipment, except for land, are insured with PT Asuransi Sinar Mas with a total coverage amounted to Rp917,905 and Rp963,472, respectively (Note 13).

j. Bank menandatangani asuransi kredit dengan PT Asuransi Simas Insurtech, dengan manfaat sampai dengan 15 November 2025. (Catatan 12).

j. The Bank signed credit insurance with PT Asuransi Simas Insurtech, with benefits until November 15, 2025 (Note 12).

k. Pada tanggal 31 Desember 2024 dan 2023, tidak terdapat anggota atau kelompok pemegang saham utama yang juga sebagai karyawan dan manajemen kunci lainnya.

k. As of December 31, 2024 and 2023, there are no major members or groups of shareholders who are also employees and other key management.

l. Grup telah menunjuk PT Asuransi Simas Jiwa, pihak berelasi, untuk mengatur program pensiun (Catatan 41).

l. The Group has appointed PT Asuransi Simas Jiwa, a related party, to manage the pension program (Note 41).

## 38. Komitmen dan Kontinjensi / 38. Commitments and Contingencies

a. Komitmen pembelian dan penjualan tunai mata uang asing

a. Spot and forward purchases and sales of foreign currencies

| | 2024 | 2023 | |
|---|---|---|---|
| Pembelian tunai mata uang asing *(spot, forward* dan swap*)* | | | Spot and forward contracts to purchased of foreign currencies |
| Dollar Amerika Serikat | 177.045 | 515.800 | U.S.Dollar |
| Dollar Singapura | - | 7.696 | Singapore Dollar |
| Jumlah | 177.045 | 523.496 | Total |
| Penjualan tunai mata uang asing *(spot, forward* dan swap*)* | | | Spot and forward contracts to sell foreign currencies |
| Dollar Amerika Serikat | 523.892 | 2.546.597 | U.S.Dollar |

Pada tanggal 31 Desember 2024, transaksi *spot, forward,* dan *swap* di atas akan selesai masing-masing dalam 1 hari sampai 2 hari, 1 hari sampai 40 hari, dan 1 hari sampai 56 hari.

As of December 31, 2024, the above spot, forward, and swap transactions are normally settled in 1 day to 2 days, 1 days to 40 days and 1 day to 56 days, respectively.

Pada tanggal 31 Desember 2023, transaksi *spot* dan *swap* di atas akan selesai masing-masing dalam 1 sampai 2 hari dan sampai 21 hari.

As of December 31, 2023, the above spot and swap transactions are normally settled in 1 day to 2 days, to 21 days, respectively.

b. Bank memiliki tagihan dan liabilitas komitmen dan kontinjensi dalam rangka ekspor-impor, pemberian garansi dan pemberian kredit kepada debitur dengan rincian sebagai berikut:

b. The Bank has commitments and contingent receivables and liabilities under export-import transaction, guarantees given, and loans given to debtors as follows:

| | 2024 | 2023 | |
|---|---|---|---|
| **Komitmen** | | | **Commitments** |
| Liabilitas Komitmen | | | Commitment Liabilities |
| Fasilitas kredit kepada debitur yang belum digunakan | 512.494 | 474.753 | Unused loan commitments granted to debtors |
| *Irrevocable letters of credit* | 29.011 | 103.015 | Irrevocable letters of credit |
| Jumlah | 541.505 | 577.768 | Total |
| **Kontinjensi** | | | **Contingencies** |
| Tagihan Kontinjensi | | | Contingent Receivables |
| Pendapatan bunga dalam penyelesaian | 32.107 | 32.486 | Past due interest revenues |
| Liabilitas Kontinjensi | | | Contingent Liabilities |
| Bank garansi | 789.456 | 924.115 | Bank guarantees |
| Jumlah - bersih | (757.349) | (891.629) | Net |

Pada tanggal 31 Desember 2024 dan 2023, saldo transaksi komitmen dan kontinjensi berupa *letters of credit* dan bank garansi dengan pihak berelasi masing-masing sebesar Rp114.779 dan 116.355 (Catatan 37).

Pada tanggal 31 Desember 2024 dan 2023, jangka waktu untuk *letter of credit* masing-masing berkisar antara 1 - 3 bulan, dan 1 - 7 bulan, sedangkan untuk bank garansi masing-masing berkisar antara 2 - 60 bulan dan 1 - 60 bulan.

Saldo *Letter of Credit* yang dijamin dengan jaminan tunai pada tanggal 31 Desember 2024 dan 2023 masing-masing adalah sebesar Rp69 dan Rp2.191.

Saldo bank garansi yang dijamin dengan jaminan tunai pada tanggal 31 Desember 2024 dan 2023 masing-masing adalah sebesar Rp523.454 dan Rp650.889.

As of December 31, 2024 and 2023, commitment and contingent transactions consisting of letters of credit and bank guarantees with related parties amounted to Rp114,779 and Rp116,355, respectively (Note 37).

As of December 31, 2024 and 2023, the average terms of letters of credit are from 1 month until 3 months and 1 month until 7 months, respectively, while for bank guarantees are from 2 month until 60 months and 1 month until 60 months, respectively.

Letters of credit outstanding secured by cash collateral as of December 31, 2024 and 2023 amounted to Rp69 and Rp2,191, respectively.

Bank guarantees secured by cash collateral as of December 31, 2024 and 2023 amounted to Rp523,454 and Rp650,889, respectively.

## 39. Aset dan Liabilitas dalam Mata Uang Asing

a. Posisi aset dan liabilitas dalam mata uang asing adalah sebagai berikut:

## 39. Monetary Assets and Liabilities Denominated in Foreign Currencies

a. The balances of monetary assets and liabilities denominated in foreign currencies at balance sheet dates are as follows:

| | | Ekuivalen Rp/ *Equivalent Rp* | | |
|---|---|---|---|---|
| | | 2024 | 2023 | |
| Aset | | | | Assets |
| Kas | USD | 59.594 | 32.557 | Cash |
| | SGD | 9.859 | 14.605 | |
| | EUR | 8.798 | 11.261 | |
| | SAR | 8.296 | 250 | |
| | AUD | 2.904 | 8.308 | |
| | CNY | 2.566 | 2.201 | |
| | JPY | 2.245 | 2.502 | |
| | HKD | 1.114 | 718 | |
| | GBP | 1.036 | 658 | |

| | | Ekuivalen Rp/ *Equivalent Rp* | | |
|---|---|---|---|---|
| | | 2024 | 2023 | |
| Aset | | | | Assets |
| Giro pada Bank Indonesia | USD | 673.985 | 420.348 | Demand deposits with Bank Indonesia |
| Giro pada bank lain | USD | 1.274.341 | 2.354.998 | Demand deposits with other banks |
| | AUD | 546.101 | 68.759 | |
| | SGD | 101.321 | 41.997 | |
| | CNY | 34.985 | 42.410 | |
| | EUR | 21.055 | 26.183 | |
| | JPY | 11.275 | 8.069 | |
| | HKD | 3.594 | 1.206 | |
| | NZD | 3.548 | 2.145 | |
| | SAR | 3.011 | 821 | |
| | GBP | 2.347 | 5.454 | |
| Penempatan pada Bank Indonesia dan bank lain | USD | 3.992.026 | 4.613.389 | Placements with Bank Indonesia and other banks |
| Efek-efek | USD | 742.817 | 810.309 | Securities |
| | EUR | 24.098 | - | |
| Kredit yang diberikan dan piutang/ pembiayaan syariah | USD | 413.999 | 530.426 | Loan and receivables/ sharia financing |
| Tagihan akseptasi | USD | 30.762 | 50.073 | Acceptances receivable |
| Pendapatan yang masih akan diterima | USD | 14.231 | 8.960 | Accrued income |
| Aset lain-lain | USD | 2.161 | 6.179 | Other assets |
| | JPY | - | 2.227 | |
| Jumlah Aset | | 7.992.069 | 9.067.013 | Total Assets |
| Liabilitas | | | | Liabilities |
| Liabilitas segera | USD | 1.957 | 8.623 | Liabilities immediately payable |
| | SGD | 354 | 349 | |
| | EUR | 4 | - | |
| Simpanan | USD | 6.591.051 | 6.435.384 | Deposits |
| | AUD | 549.644 | 74.867 | |
| | SGD | 104.824 | 63.770 | |
| | EUR | 45.984 | 45.696 | |
| | CNY | 36.969 | 41.685 | |
| | JPY | 7.012 | 6.598 | |
| | SAR | 2.839 | 869 | |
| | GBP | 1.027 | 1.163 | |
| | NZD | 1.023 | 81 | |
| Liabilitas akseptasi | USD | 30.778 | 50.082 | Acceptances payable |
| Estimasi kerugian komitmen dan kontijensi | USD | 357 | 684 | Estimated losses on commitment and contingencies |
| Beban yang masih harus dibayar | USD | 600 | 2.146 | Accrued expenses |
| Liabilitas lain-lain | USD | 147.630 | 6.203 | Other liabilities |
| | SGD | 13 | - | |
| Jumlah Liabilitas | | 7.522.066 | 6.738.200 | Total liabilities |
| Dana Syirkah Temporer | | | | Temporary Syirkah Funds |
| Simpanan | USD | 193.139 | 4.692 | Deposits |
| Jumlah Liabilitas dan Dana Syirkah Temporer | | 7.715.205 | 6.742.892 | Total Liabilities and Temporary Syirkah Funds |
| Aset (Liabilitas) Bersih | | 276.864 | 2.324.121 | Net Assets (Liabilities) |

b. Posisi Devisa Neto (PDN)

Posisi Devisa Neto sesuai Peraturan Otoritas Jasa Keuangan diungkapkan pada Catatan 50g.

b. Net Open Position (NOP)

Net Open Position in accordance with Financial Services Authority Regulation are disclosed in Note 50g.

## 40. Pengukuran Nilai Wajar

Tabel berikut menyajikan pengukuran nilai wajar aset dan liabilitas (tidak termasuk akun syariah):

## 40. Fair Value Measurement

The following table presents the fair value measurement of assets and liabilities (excluding sharia accounts):

| | 2024 | | | | |
|---|---|---|---|---|---|
| | | Pengukuran Nilai Wajar Menggunakan:/ Fair Value Measurement Using: | | | |
| | Nilai Tercatat/ *Carrying Values* | Harga Kuotasian Dalam Pasar Aktif/ (*Level 1*)/ *Quoted Prices in Active Markets (Level 1)* | Input Signifikan yang Dapat Diobservasi (*Level 2*)/ *Significant Observable Inputs (Level 2)* | Input Signifikan yang Tidak Dapat Diobservasi (*Level 3*)/ *Significant Unobservable Inputs (Level 3)* | |
| ***Aset yang diukur pada nilai wajar:*** | | | | | ***Assets measured at fair value:*** |
| **Aset keuangan yang diukur pada nilai wajar melalui laba rugi** | | | | | **Financial assets at FVPL** |
| Efek-efek | 3.526.237 | 3.526.237 | - | - | Securities |
| Tagihan derivatif | 1.855 | 1.855 | - | - | Derivative receivables |
| **Aset keuangan yang diukur pada penghasilan komprehensif lain** | | | | | **Financial assets at OCI** |
| Efek-efek | 12.032.034 | 12.032.034 | - | - | Securities |
| **Aset tetap yang dicatat pada nilai revaluasi** | | | | | **Property and equipment carried revalued amount** |
| Tanah dan bangunan | 608.441 | - | 652.750 | - | Land and buildings |
| ***Aset yang nilai wajarnya disajikan:*** | | | | | ***Assets for which fair values are disclosed:*** |
| **Diukur pada biaya perolehan diamortisasi** | | | | | **Measured at amortized cost** |
| Penempatan pada Bank Indonesia dan bank lain | 8.725.976 | 8.725.976 | - | - | Placements with Bank Indonesia and other bank |
| Efek-efek | 6.565.005 | 6.565.005 | - | - | Securities |
| Efek yang dibeli dengan janji jual kembali | 192.215 | - | 192.215 | | Securities bought under agreements to repurchase |
| Kredit yang diberikan - bersih | 12.806.287 | - | 12.806.287 | - | Loans - net |
| Tagihan akseptasi - bersih | 38.129 | - | 38.129 | - | Acceptance receivable - net |
| ***Liabilitas yang diukur pada nilai wajar:*** | | | | | ***Liabilities measured at fair value:*** |
| **Liabilitas keuangan yang diukur pada nilai wajar melalui laba rugi** | | | | | **Financial liabilities at FVPL** |
| Liabilitas derivatif | 1.746 | 1.746 | - | - | Derivative liabilities |
| ***Liabilitas yang nilai wajarnya disajikan:*** | | | | | ***Liabilities for which fair values are disclosed:*** |
| **Diukur pada biaya perolehan diamortisasi:** | | | | | **Measured at amortized cost** |
| Obligasi subordinasi | 500.000 | 451.887 | - | - | Subordinated bonds |

| | 2023 | | | | |
|---|---|---|---|---|---|
| | | Pengukuran Nilai Wajar Menggunakan:/ Fair Value Measurement Using: | | | |
| | Nilai Tercatat/ *Carrying Values* | Harga Kuotasian Dalam Pasar Aktif/ (*Level 1*)/ *Quoted Prices in Active Markets (Level 1)* | Input Signifikan yang Dapat Diobservasi (*Level 2*)/ *Significant Observable Inputs (Level 2)* | Input Signifikan yang Tidak Dapat Diobservasi (*Level 3*)/ *Significant Unobservable Inputs (Level 3)* | |
| ***Aset yang diukur pada nilai wajar:*** | | | | | ***Assets measured at fair value:*** |
| **Aset keuangan yang diukur pada nilai wajar melalui laba rugi** | | | | | **Financial assets at FVPL** |
| Efek-efek | 2.334.543 | 2.334.543 | - | - | Securities |
| Tagihan derivatif | 27.502 | 27.502 | - | - | Derivative receivables |
| **Aset keuangan yang diukur pada penghasilan komprehensif lain** | | | | | **Financial assets at OCI** |
| Efek-efek | 13.271.678 | 13.271.678 | - | - | Securities |
| **Aset tetap yang dicatat pada nilai revaluasi** | | | | | **Property and equipment carried revalued amount** |
| Tanah dan bangunan | 637.234 | - | 652.750 | - | Land and buildings |
| ***Aset yang nilai wajarnya disajikan:*** | | | | | ***Assets for which fair values are disclosed:*** |
| **Diukur pada biaya perolehan diamortisasi** | | | | | **Measured at amortized cost** |
| Penempatan pada Bank Indonesia dan bank lain | 6.263.376 | 6.263.376 | - | - | Placements with Bank Indonesia and other bank |
| Efek-efek | 2.525.850 | 2.525.850 | - | - | Securities |
| Kredit yang diberikan - bersih | 15.185.200 | - | 15.185.200 | - | Loans - net |
| Tagihan akseptasi - bersih | 78.304 | - | 78.304 | - | Acceptance receivable - net |
| ***Liabilitas yang diukur pada nilai wajar:*** | | | | | ***Liabilities measured at fair value:*** |
| **Liabilitas keuangan yang diukur pada nilai wajar melalui laba rugi** | | | | | **Financial liabilities at FVPL** |
| Liabilitas derivatif | 3.235 | 3.235 | - | - | Derivative liabilities |
| ***Liabilitas yang nilai wajarnya disajikan:*** | | | | | ***Liabilities for which fair values are disclosed:*** |
| **Diukur pada biaya perolehan diamortisasi:** | | | | | **Measured at amortized cost** |
| Obligasi subordinasi | 500.000 | 460.245 | - | - | Subordinated bonds |

Nilai wajar instrumen keuangan yang diperdagangkan di pasar aktif adalah berdasarkan kuotasi harga pasar pada tanggal pelaporan. Pasar dianggap aktif apabila kuotasi harga tersedia sewaktu-waktu dan dapat diperoleh secara rutin dari bursa, pedagang efek, perantara efek, kelompok industri atau badan penyedia jasa penentuan harga, atau badan pengatur, dan harga tersebut mencerminkan transaksi pasar yang aktual dan rutin dalam suatu transaksi yang wajar. Kuotasi harga pasar yang digunakan untuk aset keuangan yang dimiliki oleh Perusahaan adalah harga penawaran (*bid price*) terkini. Instrumen keuangan seperti ini termasuk dalam hierarki Level 1.

The fair value of financial instruments traded in active markets is based on quoted market prices at the reporting date. A market is regarded as active if quoted prices are readily and regularly available from an exchange, dealer, or broker, industry group pricing service, or regulatory agency, and those prices represent actual and regularly occurring market transaction on an arm's lengths basis. The quoted market price used for financial assets held by the Company is the current bid price. These instruments are included in Level 1.

Nilai wajar instrumen keuangan yang tidak diperdagangkan di pasar aktif ditentukan menggunakan teknik penilaian. Teknik penilaian ini memaksimalkan penggunaan data pasar yang dapat diobservasi yang tersedia dan sesedikit mungkin mengandalkan estimasi spesifik yang dibuat oleh entitas. Jika seluruh input signifikan yang dibutuhkan untuk menentukan nilai wajar dapat diobservasi, maka instrumen tersebut termasuk dalam hierarki Level 2.

The fair value of financial instruments that are not traded in an active market is determined by using valuation techniques. These valuation techniques maximize the use of observable market data where it is available and rely as little as possible on entity's specific estimates. If all significant inputs required to fair value an instrument are observable, the instrument is included in Level 2.

Jika satu atau lebih input signifikan tidak diambil dari data pasar yang dapat diobservasi, maka instrumen tersebut termasuk dalam hierarki Level 3.

If one or more of the significant inputs is not based on observable market data, the instrument is included in Level 3.

Teknik penilaian spesifik yang digunakan untuk menentukan nilai wajar instrumen keuangan termasuk:

- Kuotasi harga pasar atau kuotasi harga penjual untuk instrumen sejenis;
- Nilai wajar *swap* suku bunga dihitung dari nilai kini estimasi arus kas masa depan berdasarkan kurva hasil yang dapat diobservasi;
- Nilai wajar kontrak mata uang asing berjangka ditentukan berdasarkan kurs tukar berjangka pada tanggal pelaporan;
- Teknik penilaian lainnya, seperti analisa arus kas diskonto, digunakan untuk menentukan nilai wajar instrumen keuangan lainnya.

Specific valuation techniques used to value financial instruments include:

- Quoted market prices or dealer quotes for similar instruments;
- The fair value of interest rate swaps is calculated as the present value of the estimated future cash flows based on observable yield curves;
- The fair value of forward foreign exchange contracts is determined using forward exchange rates at the reporting date; and
- Other techniques, such as discounted cash flow analysis, are used to determine fair value for the remaining financial instruments.

Nilai wajar tidak diungkapkan untuk instrumen keuangan Perusahaan yang nilai tercatatnya telah mendekati estimasi nilai wajarnya serta instrumen keuangan yang nilai wajarnya tidak dapat diukur dengan andal karena tidak memiliki kuotasi harga di pasar aktif atau tidak memiliki jatuh tempo yang pasti.

The fair value of financial instruments are no longer disclosed when the carrying values approximates the fair value and financial instruments with determinable fair value because they have no quoted price in active market or do not have specific due date.

## 41. Liabilitas Imbalan Kerja Jangka Panjang

Untuk pendanaan imbalan kerja jangka panjang tersebut, Grup menyelenggarakan program dana pensiun manfaat pasti untuk seluruh karyawan tetap yang memenuhi syarat. Imbalan tersebut akan dibayarkan pada saat karyawan pensiun, cacat tetap atau diberhentikan.

Grup telah menunjuk PT Asuransi Simas Jiwa untuk mengelola program pensiun tersebut melalui Dana Pensiun Lembaga Keuangan Simas Jiwa, yang pendiriannya telah disahkan menurut Keputusan Dewan Komisioner Otoritas Jasa Keuangan No. KEP-61/NB.1/2018 tanggal 16 Oktober 2018 mengenai Pengesahan atas Peraturan Dana Pensiun dari Dana Pensiun Lembaga Keuangan (DPLK) Simas Jiwa.

Perhitungan aktuaria terakhir atas liabilitas imbalan kerja jangka panjang dilakukan oleh Kantor Konsultan Aktuaria (KKA) Indra Catarya Situmeang dan Rekan, aktuaris independen, dengan laporan terakhir tertanggal 13 Maret 2025.

Jumlah karyawan yang berhak atas imbalan kerja (iuran Perusahaan) jangka panjang tersebut masing-masing sebanyak 4.708 dan 4.666 karyawan periode 31 Desember 2024 dan 2023.

Jumlah yang diakui dalam laporan laba rugi dan penghasilan komprehensif lain konsolidasi sehubungan dengan imbalan pasti adalah sebagai berikut:

## 41. Long-term Employee Benefits Liability

To fund these long-term employee benefits, the Group operates a defined benefit pension plan for all qualified permanent employees. The benefits will be paid at the time the employee retires, is permanently disabled or is terminated.

The Group has appointed PT Asuransi Simas Jiwa to manage the pension program through the Simas Jiwa Financial Institution Pension Fund, the establishment of which was approved according to Decision of the Financial Services Authority Commissioner Board No. KEP-61/NB.1/ 2018 dated October 16, 2018 concerning Ratification of the Pension Fund Regulation from the Financial Institution Pension Fund (DPLK) Simas Jiwa.

The latest actuarial calculation of the long-term employee benefits liability is performed by Indra Catarya Situmeang and Partner: Actuarial Consultant Office (KKA), an independent actuary, with the latest report dated March 13, 2025.

Number of eligible employees (Company contribution) is 4,708 and 4,666 for the years ended December 31, 2024 and 2023, respectively.

The liabilities amount included in the consolidated statement of financial position arising from the obligation in respect of its defined benefit plan is as follows:

| | 2024 | 2023 | |
|---|---|---|---|
| Nilai kini kewajiban imbalan pasti | 93.240 | 84.019 | Present value of funded defined-benefit |
| Nilai wajar aset program | (48.491) | (48.593) | Fair value of plan assets |
| **Jumlah liabilitas imbalan kerja jangka panjang** | **44.749** | **35.426** | **Total long-term employee benefits liability** |

Jumlah-jumlah yang diakui dalam laporan laba rugi dan penghasilan komprehensif lain sehubungan dengan imbalan pasti adalah sebagai berikut:

Amount recognized in the statement of profit or loss and other comprehensive income in respect of this benefit plans are as follows:

| | 2024 | 2023 | |
|---|---|---|---|
| Biaya jasa kini | 13.845 | 12.232 | Current service costs |
| Biaya jasa lalu | - | (460) | Past service costs |
| Biaya bunga neto | 5.291 | 4.529 | Net interest expense |
| Pendapatan Bunga Dari Aset Program | (3.192) | - | Interest revenue from Asset Program |
| Kelebihan Pembayaran Imbalan Kerja | 10.808 | - | Excess in benefit payment |
| Komponen biaya (pendapatan) imbalan pasti yang diakui di laba rugi | 26.752 | 16.301 | Components of defined benefit costs (income) recognized in profit or |
| Pengukuran kembali liabilitas imbalan pasti-kerugian aktuarial sebagai penghasilan komprehensif lain | 1.491 | 2.984 | Remeasurement on the defined benefit liability actuarial losses/(gains) as other comprehensive income |
| Jumlah | 28.243 | 19.285 | Total |

Biaya dan pendapatan imbalan pasti untuk tahun yang berakhir 31 Desember 2024 dan 2023 masing-masing sebesar Rp26.752 dan Rp16.301, disajikan sebagai bagian dari "Beban umum dan administrasi" dan "Pendapatan operasional lainnya – Lain-lain" (Catatan 31).

The defined benefit income and costs for the year ended December 31, 2024 and 2023, are Rp26,752 and Rp16,301, respectively, are presented as part of "General and administrative expenses" and "Other operating revenue – Others" (Notes 31).

Mutasi liabilitas imbalan kerja jangka panjang yang diakui di laporan posisi keuangan adalah sebagai berikut:

Movements of long-term employee benefit obligations recognized in the statement of financial position follows:

| | 2024 | 2023 | |
|---|---|---|---|
| Liabilitas imbalan kerja jangka panjang awal tahun | 35.426 | 36.141 | Long-term employee benefits liability at beginning of the year |
| Beban (pendapatan) imbalan kerja jangka panjang tahun berjalan | 26.752 | 16.301 | Long-term employee benefits liability expense (income) during the year |
| Kerugian komprehensif lain | 1.491 | 2.984 | Other comprehensive losses |
| Kelebihan Pembayaran Imbalan Kerja | (10.808) | - | Excess in benefit payment |
| Iuran Bank | (8.112) | (20.000) | Bank's contribution |
| **Liabilitas imbalan kerja jangka panjang akhir tahun** | **44.749** | **35.426** | **Long-term employee benefits liability reserve at end of the year** |

Mutasi nilai wajar aset program adalah sebagai berikut:

Movement of fair value of plan assets as follow:

| | 2024 | 2023 | |
|---|---|---|---|
| Saldo awal tahun | 48.593 | 32.109 | Balance at the beginning of the year |
| Kontribusi pemberi kerja | 8.112 | 20.000 | Contributions from the employer |
| Pembayaran Imbalan | (11.075) | (6.480) | Benefits paid |
| Pendapatan Bunga Dari Aset Program | 3.192 | - | Interest revenue from Asset Program |
| Keuntungan/(kerugian) aktuaria-aset program | (331) | 2.964 | Actuarial gain/(loss)-asset program |
| **Saldo akhir tahun** | **48.491** | **48.593** | **Balance at the end of the year** |

Investasi aset program terdiversifikasi dengan baik, sehingga kegagalan salah satu investasi tidak memiliki dampak material terhadap keseluruhan aset program. Porsi terbesar aset investasi ditempatkan pada instrumen ekuitas, meskipun Perusahaan juga berinvestasi pada properti, obligasi, instrumen lindung nilai dan kas.

Investments are well-diversified, such that the failure of any single investment would not have a material impact on the overall level of assets. The largest proportion of assets is invested in equities, although the Company also invests in property, bonds, hedge funds and cash.

Perusahaan meyakini bahwa instrumen ekuitas memberikan imbal hasil yang paling baik dalam jangka panjang pada tingkatan risiko yang dapat diterima.

The Company believes that equities instrument offers the best returns over the long term with an acceptable level of risk.

Asumsi-asumsi aktuarial utama yang digunakan dalam perhitungan imbalan kerja jangka panjang:

Principal actuarial assumptions used in the valuation of the long-term employment benefits are as follows:

| | 2024 | 2023 | |
|---|---|---|---|
| Usia pensiun normal (tahun) | 55 | 55 | Normal retirement age (years) |
| Tingkat diskonto tahunan | 7,14% | 6,79% | Annual discount rate |
| Tingkat kenaikan gaji tahunan | 2,38% | 2,38% | Annual increase of salary rate |
| Tingkat perputaran karyawan: | | | Employee turn over |
| sampai dengan usia 40 tahun | 9% | 9% | up to the age of 40 years old |
| sampai dengan saat usia 55 tahun | 0% | 0% | up to the age of 55 years old |
| Tabel mortalita | TMI 4 | TMI 4 | Mortality rate table |

Analisa sensitivitas dari perubahan asumsi-asumsi utama terhadap liabilitas imbalan kerja jangka panjang adalah sebagai berikut:

The sensitivities of the overall long-term employee benefit liabilities to changes in the weighted principal assumptions are as follows:

| | 2024 | | | |
|---|---|---|---|---|
| | Kenaikan (Penurunan) Liabilitas Imbalan Pasti/ *Long-term Employee Benefit Increase (Decrease)* | | | |
| | Perubahan Asumsi/ *Changes in Assumptions* | Kenaikan Asumsi/ *Increase in Assumptions* | Penurunan Asumsi/ *Decrease in Assumptions* | |
| Tingkat diskonto | 1% | (8.663) | 7.837 | Discount rate |
| Tingkat pertumbuhan gaji | 1% | 8.238 | (9.013) | Salary growth rate |

| | 2023 | | | |
|---|---|---|---|---|
| | Kenaikan (Penurunan) Liabilitas Imbalan Pasti/ *Long-term Employee Benefit Increase (Decrease)* | | | |
| | Perubahan Asumsi/ *Changes in Assumptions* | Kenaikan Asumsi/ *Increase in Assumptions* | Penurunan Asumsi/ *Decrease in Assumptions* | |
| Tingkat diskonto | 1% | (6.753) | 7.696 | Discount rate |
| Tingkat pertumbuhan gaji | 1% | 7.966 | (7.090) | Salary growth rate |

## 42. Saldo Laba yang Ditentukan Penggunaannya

Berdasarkan Rapat Umum Pemegang Saham yang didokumentasikan dalam Akta Berita Acara Rapat Umum Pemegang Saham Tahunan PT Bank Sinarmas Tbk No. 21 tanggal 16 Mei 2024 dari Aulia Taufani, S.H., notaris di Jakarta, pemegang saham menyetujui untuk menyisihkan saldo laba sebesar Rp500 untuk cadangan umum.

Berdasarkan Rapat Umum Pemegang Saham yang didokumentasikan dalam Akta Berita Acara Rapat Umum Pemegang Saham Tahunan PT Bank Sinarmas Tbk No. 133 tanggal 27 Juni 2023 dari Aulia Taufani, S.H., notaris di Jakarta, pemegang saham menyetujui untuk menyisihkan saldo laba sebesar Rp500 untuk cadangan umum.

Pada tanggal 31 Desember 2024 dan 2023, saldo laba yang ditentukan penggunaannya untuk cadangan umum adalah masing-masing sebesar Rp10.000 dan Rp9.500.

## 42. Appropriated Retained Earnings

In the General Meeting of Shareholders, which was stated in Deed of Minutes of Annual General Meeting of Shareholders of PT Bank Sinarmas Tbk. No. 21 dated May 16, 2024 from Aulia Taufani, S.H., notary in Jakarta, the shareholders agreed to set aside retained earnings of Rp500 for general reserve.

In the General Meeting of Shareholders, which was stated in Deed of Minutes of Annual General Meeting of Shareholders of PT Bank Sinarmas Tbk. No. 133 dated June 27, 2023 from Aulia Taufani, S.H., notary in Jakarta, the shareholders agreed to set aside retained earnings of Rp500 for general reserve.

As fo December 31, 2024 and 2023, outstanding appropriated retained earnings for general reserve amounted to Rp10,000 and Rp9,500, respectively.

## 43. Kontinjensi

Grup menghadapi perkara hukum atau gugatan yang timbul dari kegiatan normal usahanya. Manajemen Perusahaan bersama dengan penasehat hukum berpendapat bahwa liabilitas akhir atas perkara hukum atau gugatan tersebut, jika ada, tidak memiliki pengaruh yang material terhadap laporan keuangan. Oleh karena itu, tidak ada provisi yang dibentuk atas liabilitas kontinjensi tersebut.

## 43. Contingencies

The Group is a party to certain lawsuits or claims arising from their ordinary course of business. The Company's management and legal counsels believe that the eventual liabilities under these lawsuits or claims, if any, will not have a material effect on the financial statements, thus, no provision has been made for these contingent liabilities.

## 44. Informasi Segmen

a. Segmen Usaha

Informasi segmen Perusahaan disajikan berdasarkan jenis kegiatan usahanya, yakni pemasaran dan kredit, *treasury*, dan ekspor-impor. Kegiatan usaha tersebut menjadi dasar pelaporan informasi segmen primer Perusahaan, sebagai berikut:

Laporan laba rugi dan penghasilan komprehensif lain konsolidasian:

## 44. Segment Information

a. Operating Segments

The Company's segment information is presented based on its business activities, namely marketing and credit, treasury, and trade finance. These business activities are the basis of Company's operating segment information, which follows:

Consolidated statement of profit or loss and comprehensive income:

| | 2024 | | | | | | |
|---|---|---|---|---|---|---|---|
| | Bank Umum/ *Commercial Bank* | | | Bank Umum Syariah/ *Sharia Bank* | | | |
| | Pemasaran dan Kredit/ *Marketing and Credit* | Treasuri/ *Treasury* | Ekspor-impor/ *Trade Finance* | Pemasaran dan Kredit/ *Marketing and Credit* | Treasuri/ *Treasury* | Jumlah/ *Total* | |
| Pendapatan | | | | | | | Revenues |
| Pendapatan bunga dan pendapatan syariah | 1.587.171 | 1.429.107 | 2.635 | 480.336 | 289.654 | 3.788.903 | Interest revenues and sharia income |
| Pendapatan operasional lainnya | 231.018 | 208.066 | 6.806 | 65.119 | 1.141 | 512.150 | Other operating revenues |
| Jumlah Pendapatan | 1.818.189 | 1.637.173 | 9.441 | 545.455 | 290.795 | 4.301.053 | Total Revenues |
| Beban | | | | | | | Expenses |
| Beban bunga dan beban syariah | 737.743 | 91.865 | - | 355.686 | 4.801 | 1.190.095 | Interest expenses and sharia expenses |
| Beban operasional lainnya | 129.718 | 10.487 | (322) | (782) | - | 139.101 | Other operating expenses |
| Jumlah Beban | 867.461 | 102.352 | (322) | 354.904 | 4.801 | 1.329.196 | Total Expenses |
| Pendapatan segmen - bersih | | | | | | 2.971.857 | Segment revenues - net |
| Pendapatan yang tidak dapat dialokasikan | | | | | | 464.198 | Unallocated revenues |
| Beban yang tidak dapat dialokasikan | | | | | | 2.997.239 | Unallocated expenses |
| Laba sebelum pajak | | | | | | 438.816 | Income before tax |
| Beban pajak | | | | | | (68.679) | Tax expense |
| Laba bersih | | | | | | 370.137 | Net Income |

| | 2023 | | | | | | |
|---|---|---|---|---|---|---|---|
| | Bank Umum/ *Commercial Bank* | | | Bank Umum Syariah/ *Sharia Bank* | | | |
| | Pemasaran dan Kredit/ *Marketing and Credit* | Treasuri/ *Treasury* | Ekspor-impor/ *Trade Finance* | Pemasaran dan Kredit/ *Marketing and Credit* | Treasuri/ *Treasury* | Jumlah/ *Total* | |
| Pendapatan | | | | | | | Revenues |
| Pendapatan bunga dan pendapatan syariah | 1.312.836 | 1.468.252 | 707 | 555.063 | 178.953 | 3.515.811 | Interest revenues and sharia income |
| Pendapatan operasional lainnya | 218.206 | 110.239 | 2.796 | 41.626 | - | 372.867 | Other operating revenues |
| Jumlah Pendapatan | 1.531.042 | 1.578.491 | 3.503 | 596.689 | 178.953 | 3.888.678 | Total Revenues |
| Beban | | | | | | | Expenses |
| Beban bunga dan beban syariah | 586.871 | 46.052 | - | 257.742 | 1.827 | 892.492 | Interest expenses and sharia expenses |
| Beban operasional lainnya | 644.884 | 234.098 | 1.738 | 126.929 | - | 1.007.649 | Other operating expenses |
| Jumlah Beban | 1.231.755 | 280.150 | 1.738 | 384.671 | 1.827 | 1.900.141 | Total Expenses |
| Pendapatan segmen - bersih | | | | | | 1.988.537 | Segment revenues - net |
| Pendapatan yang tidak dapat dialokasikan | | | | | | 553.198 | Unallocated revenues |
| Beban yang tidak dapat dialokasikan | | | | | | 2.468.157 | Unallocated expenses |
| Laba sebelum pajak | | | | | | 73.578 | Income before tax |
| Beban pajak | | | | | | 2.218 | Tax expense |
| Laba bersih | | | | | | 75.796 | Net Income |

Laporan posisi keuangan konsolidasian: / Consolidated statement of financial position:

| | 2024 | | | | | | |
|---|---|---|---|---|---|---|---|
| | Bank Umum/ *Commercial Bank* | | | Bank Umum Syariah/ *Sharia Bank* | | | |
| | Pemasaran dan Kredit/ *Marketing and Credit* | Treasuri/ *Treasury* | Ekspor-impor/ *Trade Finance* | Pemasaran dan Kredit/ *Marketing and Credit* | Treasuri/ *Treasury* | Jumlah/ *Total* | |
| Aset | | | | | | | Assets |
| Aset segmen | 10.873.278 | 32.539.963 | 38.129 | 2.708.864 | 6.600.417 | 52.760.651 | Segment assets |
| Aset yang tidak dapat dialokasikan | | | | | | 2.863.782 | Unallocated assets |
| Jumlah Aset | | | | | | 55.624.433 | Total Assets |
| Liabilitas | | | | | | | Liabilities |
| Liabilitas segmen | 36.720.261 | 1.392.278 | 185.275 | 1.364.310 | - | 39.662.124 | Segment liabilities |
| Liabilitas yang tidak dapat dialokasikan | | | | | | 437.166 | Unallocated liabilities |
| Dana Syirkah Temporer | | | | 6.925.521 | - | 6.925.521 | Temporary Syirkah Funds |
| Jumlah Liabilitas dan Dana Syirkah Temporer | | | | | | 47.024.811 | Total Liabilities and Temporary Syirkah Funds |

| | 2023 | | | | | | |
|---|---|---|---|---|---|---|---|
| | Bank Umum/ *Commercial Bank* | | | Bank Umum Syariah/ *Sharia Bank* | | | |
| | Pemasaran dan Kredit/ *Marketing and Credit* | Treasuri/ *Treasury* | Ekspor-impor/ *Trade Finance* | Pemasaran dan Kredit/ *Marketing and Credit* | Treasuri/ *Treasury* | Jumlah/ *Total* | |
| Aset | | | | | | | Assets |
| Aset segmen | 11.805.803 | 32.998.868 | 78.339 | 4.660.759 | 363.474 | 49.907.243 | Segment assets |
| Aset yang tidak dapat dialokasikan | | | | | | 2.727.753 | Unallocated assets |
| Jumlah Aset | | | | | | 52.634.996 | Total Assets |
| Liabilitas | | | | | | | Liabilities |
| Liabilitas segmen | 35.317.113 | 1.559.673 | 222.635 | 312.464 | 1 | 37.411.886 | Segment liabilities |
| Liabilitas yang tidak dapat dialokasikan | | | | | | 377.022 | Unallocated liabilities |
| Dana Syirkah Temporer | | | | 7.019.320 | - | 7.019.320 | Temporary Syirkah Funds |
| Jumlah Liabilitas dan Dana Syirkah Temporer | | | | | | 44.808.228 | Total Liabilities and Temporary Syirkah Funds |

b. Segmen Geografis / b. Geographical Segments

Pendapatan bunga dan pendapatan syariah berdasarkan wilayah geografis adalah sebagai berikut:

Interest revenues and sharia income based on geographical segments are as follows:

| | 2024 | 2023 | |
|---|---|---|---|
| DKI Jakarta | 3.365.083 | 2.980.661 | Jakarta - Capital City |
| Pulau Jawa (diluar Jakarta) | 176.991 | 222.872 | Java Island (excluding Jakarta) |
| Pulau Sumatera | 135.692 | 165.784 | Sumatera Island |
| Pulau Sulawesi dan Maluku | 43.752 | 59.936 | Sulawesi and Maluku Island |
| Pulau Kalimantan | 39.272 | 46.404 | Kalimantan Island |
| Pulau Bali dan Lombok | 28.113 | 40.154 | Bali and Lombok Island |
| Jumlah | 3.788.903 | 3.515.811 | Total |

Nilai tercatat aset segmen dan tambahan atas aset tetap berdasarkan wilayah geografis atau lokasi aset tersebut adalah sebagai berikut:

The carrying values of segment assets and additions to property and equipment classified based on geographical region or location of the assets are as follows:

| | Nilai Tercatat Aset Segmen/ *Carrying Values of Segment Assets* | | Penambahan Aset Tetap/ *Additions to Property and Equipment* | | |
|---|---|---|---|---|---|
| | 2024 | 2023 | 2024 | 2023 | |
| DKI Jakarta | 48.424.115 | 45.297.676 | 102.222 | 156.712 | Jakarta - Capital City |
| Pulau Jawa (diluar Jakarta) | 1.973.918 | 1.877.378 | 26.810 | 6.960 | Java Island (excluding Jakarta) |
| Pulau Sumatera | 1.349.371 | 1.437.252 | 11.438 | 1.760 | Sumatera Island |
| Pulau Sulawesi dan Maluku | 405.503 | 525.739 | 4.137 | 423 | Sulawesi and Maluku Island |
| Pulau Kalimantan | 321.597 | 406.887 | 4.548 | 355 | Kalimantan Island |
| Pulau Bali dan Lombok | 286.111 | 362.262 | 4.448 | 350 | Bali and Lombok Island |
| Pulau Papua | 36 | 49 | (595) | 129 | Papua Island |
| Jumlah | 52.760.651 | 49.907.243 | 153.008 | 166.689 | Total |

## 45. Tujuan dan Kebijakan Manajemen Risiko Keuangan

Grup menyadari bahwa situasi lingkungan eksternal dan internal Grup telah mengalami perkembangan yang diikuti dengan semakin kompleksnya risiko kegiatan usaha Perbankan dan meningkatnya kebutuhan akan praktek tata kelola yang sehat *(Good Corporate Governance)*. Sebagai tanggapan terhadap kondisi tersebut, Grup telah mengimplementasikan kerangka menajemen risiko yang memadai mengacu pada pilar-pilar dan ketentuan yang tercantum dalam peraturan dan ketentuan otoritas yang disesuaikan dengan tujuan, kebijakan, ukuran dan kompleksitas usaha serta kemampuan Grup, yang meliputi:

a. Pengawasan Aktif dari Dewan Komisaris dan Direksi;
b. Kecukupan kebijakan, prosedur, dan penetapan limit;
c. Kecukupan proses identifikasi, pengukuran, pengawasan, dan pengendalian risiko, serta sistem informasi manajemen risiko;
d. Sistem pengendalian internal.

Kerangka tersebut digunakan Grup sebagai bagian integral dari menetapkan strategi, struktur organisasi, kebijakan dan pedoman serta memperkuat infrastruktur manajemen risiko guna mempertahankan tingkat kesehatan bank dan memastikan bahwa semua risiko yang dihadapi dapat diidentifikasi, diukur, dikendalikan, dimitigasi dan dilaporkan dengan baik serta aktivitas usaha yang dilakukan Grup tidak menimbulkan kerugian yang melebihi kemampuan Grup atau dapat mengganggu kelangsungan usaha Grup.

Penerapan manajemen risiko dilakukan secara konsolidasi baik dari sisi Bank Sinarmas selaku induk perusahaan maupun Bank Nano Syariah selaku anak usaha, antara lain terkait pengelolaan risiko atas produk-produk dana pihak ketiga, portofolio kredit dan pembiayaan, pengelolaan likuiditas, dan aktivitas operasional.

## 45. Financial Risk Management Objectives and Policies

Group realizes that the Group's external and internal environment has developed, followed by the increasingly complex risks of Banking business activities and the increasing need for good corporate governance practices. In response to these conditions, the Group has implemented an adequate risk management framework referring to the pillars and provisions contained in the rules and regulations of the authorities which are adjusted to the objectives, policies, size and complexity of the business as well as the Group's capabilities, which include:

a. Active Oversight from the Board of Commissioners and Directors;
b. Adequacy of policies, procedures, and determination of limits;
c. Adequacy of the identification, measurement, supervision and risk control processes, as well as the risk management information system;
d. Internal control system.

This framework is used by the Group as an integral part of establishing strategy, organizational structure, policies and guidelines as well as strengthening risk management infrastructure to maintain the soundness of the bank and ensure that all risks faced can be properly identified, measured, controlled, mitigated and reported as well as the business activities conducted by the Group do not cause losses that exceed the Group's capabilities or may interfere with the Group's business continuity.

The implementation of risk management is carried out in a consolidated manner from both Bank Sinarmas as the parent company and Bank Nano Syariah as the subsidiary, including aspects related to the management of risks associated with third-party funds, credit and financing portfolios, liquidity management, and operational activities.

Grup telah menerapkan konsep 3 (tiga) Lapis Model (*three lines model*), membagi fungsi-fungsi di dalam organisasi yang terlibat di dalam manajemen risiko menjadi tiga kelompok, yaitu pemilik risiko (*risk owner*), pengawas risiko (*risk overseer*), dan penyedia pemastian independen. Di samping itu, organisasi dapat pula melibatkan pihak eksternal sebagai lapis tambahan.

Lapis pertama adalah pemilik risiko yang bertanggung jawab mengelola risiko, dan menerapkan pengendalian internal dalam pekerjaan sehari-hari, serta melakukan tindakan korektif dalam mengatasi kelemahan pada proses dan pengendalian. Lapis kedua adalah fungsi atau unit organisasi yang membantu membangun dan memantau pengendalian lapis pertama serta memastikan lapis pertama melakukan tanggung jawabnya dengan memadai. Fungsi ini dilakukan oleh satuan kerja manajemen risiko (*risk management group),* satuan kerja kepatuhan (*compliance group*), dan penjaminan mutu (*quality assurance*). Lapis ketiga adalah *audit internal* yang memastikan secara independen pelaksanaan dari lapis pertama dan lapis kedua terhadap tata kelola, manajemen risiko, dan pengendalian internal. Untuk lapis tambahan dilakukan oleh auditor eksternal dan regulator yang memberikan tambahan informasi penerapan manajemen risiko bank kepada para pemangku kepentingan.

The Group has implemented the concept of 3 (three) lines of model, dividing the functions within the organization involved in risk management into three groups, namely risk owner, risk overseer, and independent assurance provider. In addition, the organization can also involve external parties as an additional layer.

The first layer is the risk owner who is responsible for managing risk, and implementing internal controls in daily work, as well as taking corrective actions in overcoming weaknesses in processes and controls. The second layer is a function or organizational unit that helps build, monitor the first layer of controls, and ensure that the first layer carries out its responsibilities adequately. This function is carried out by the risk management group, the compliance group and quality assurance. The third layer is internal audit, which independently ensures the implementation of the first and second layers of governance, risk management and internal control. Additional layers are carried out by external auditors and regulators who provide additional information on the implementation of bank risk management to stakeholders.

Pada Semester II Tahun 2024, Perusahaan secara berkesinambungan akan dan/atau telah melakukan beberapa upaya dalam penyempurnaan proses kredit dan *monitoring* kredit untuk meminimalkan risiko kredit. Di antaranya upaya yang telah dilakukan Perusahaan antara lain:

- Melakukan pengkinian Kebijakan/*Standar Operating Procedure* (SOP), Surat Edaran (SE), Surat Keputusan (SK) untuk menyempurnakan proses kredit *secara end to end* disesuaikan dengan perubahan faktor atau stratejik bisnis, eksposur risiko, profil risiko dan ketentuan regulator yang berlaku;

- Mengoptimalkan peningkatan kredit sesuai Rencana Bisnis Perusahaan dengan penyaluran kredit yang dilakukan secara *prudent* dan menerapkan prinsip kehati-hatian kepada debitur dengan mempertimbangkan sektor yang masih potensial dan yang masih memiliki prospek usaha, agunan aset tetap dan/atau skema penjaminan kredit melalui lembaga penjaminan untuk meminimalkan risiko kredit;

In Second Semester of 2024, the Company will continuously and/or has made several efforts to improve the credit process and credit monitoring to minimize credit risk. Among the efforts that the Company has made include:

- Updating Policies/Standar Operating Procedure (SOP), Circular Letter, Circular Letter to improve the credit process end-to end adjusted to changes in business factors or strategies, risk exposure, risk profile and applicable regulatory provisions;

- Optimize credit increase according to the Company's Business Plan by channeling credit in a prudent manner and applying the principle of prudence to debtors by considering sectors that have potential and those that still have business prospects, fixed asset collateral and/or credit guarantee schemes through guarantee institutions to minimize credit risk;

- Melakukan peningkatan frekuensi dan kualitas pemantauan kredit, monitoring pembayaran angsuran/kewajiban debitur/ nasabah serta melakukan *follow up* dan memenuhi komitmen atas temuan/ rekomendasi OJK, meningkatkan efektifitas dan efisiensi penagihan kredit bermasalah, serta memantau kondisi usaha debitur melalui indikator *Early Warning;*

- Increase the frequency and quality of credit monitoring, monitoring of installment payments/customer obligations and conducting follow-up and fulfilling commitments on findings/recommendations from OJK, increasing the effectiveness and efficiency of collecting non-performing loans, and monitor the debtor's business condition through Early Warning indicators;

- Melakukan *trade checking* untuk melihat hubungan kerjasama dan performance debitur, memantau realisasi pemenuhan dokumen *covenant* kredit sesuai yang disyaratkan pada *Offering Letter* dan menindaklanjuti apabila terjadi penyimpangan;

- Conducting trade checking to assess the cooperation relationship and performance of the debtor, monitoring the realization of the fulfillment of credit covenant documents as required in Offering Letter, and following up in case of any deviations.

- Melakukan upaya restrukturisasi kepada debitur-debitur yang mengalami penurunan usaha dengan tetap memperhatikan ketentuan baik dari karakter debitur, usaha yang masih berjalan sebagai sumber pembayaran, prospek usaha, masih memiliki kemampuan membayar;

- To undertake restructuring efforts for debtors who are experiencing decline in business while still considering the provisions regarding debtor's character, the business that is still operating as a source of payment, business prospects, and has ability to pay;

- Mengupayakan penyaluran kredit ke sektor yang tergolong *sustainable financing* dengan tetap memperhatikan kondisi ekonomi dan *risk appetite* Perusahaan;

- Striving for credit distribution to sectors that are considered as sustainable financing while still paying attention to the economic conditions and the Company's risk appetite;

- Memantau *progress* penyelesaian nasabah *Non Performing Loan* dengan memantau ketepatan pembayaran setelah restrukturisasi dilakukan, penagihan yang intensif (lisan atau tertulis), dilakukan lelang/agunan yang diambil alih (AYDA), hapus buku, dan mengoptimalisasi pemulihan kredit bermasalah;

- Monitor the progress of settlement of Non-Performing Loan customers through monitoring the accuracy of payments after the restructuring is carried out, intensive billing (oral or written), conducting auctions/foreclosed assets, write-off, and optimizing the recovery of non-performing loans;

- Optimalisasi penanganan penyelesaian kredit bermasalah dan eksekusi Hak Tanggungan melalui kerjasama dengan pengacara dan balai lelang swasta serta melakukan optimalisasi terhadap proses penagihan, restrukturisasi, pengawasan *progress* penagihan baik pada akun hapus buku, NPL, dan AYDA, serta melakukan kerjasama jasa penagihan melalui pihak ketiga;

- Optimization the handling of non-performing loan settlements and execution of Mortgage Rights through collaboration with lawyers and private auction houses as well as optimization the billing process, restructuring, monitoring the progress of billing both on write off account, NPL, and foreclosed assets, as well as cooperating in collection services through third parties;

- Secara bertahap dan berkesinambungan, Perusahaan berupaya mengurangi eksposur debitur inti, melakukan diversifikasi portofolio secara menyeluruh dan merata pada sektor ekonomi yang dimiliki Perusahaan dan meningkatkan penyediaan dana pada sektor ekonomi yang belum melampaui *risk appetite* dan/atau *risk tolerance;*

- Gradually and continuously, the Company seeks to reduce core debtor exposure, diversify its portfolio thoroughly and evenly in the economic sector owned by the Company and increase the provision of funds in economic sectors that have not exceeded their risk appetite and/or risk tolerance;

- Secara bertahap Perusahaan berupaya meningkatkan pembentukan CKPN untuk NPL mencapai 100% untuk memitigasi potensi risiko kerugian yang diakibatkan kredit bermasalah akibat penurunan kemampuan bayar debitur atau gagal bayar;
- Bank melakukan penyesuaian pada kebijakan internal dalam hal penanganan kredit restrukturisasi Covid-19 pasca berakhirnya stimulus restrukturisasi kredit perbankan dan penghapusan *tagging* restrukturisasi Covid-19;
- Melakukan *monitoring* terhadap Penyediaan Dana kepada pihak terkait dan selain pihak terkait sebagaimana yang diatur dalam ketentuan OJK tentang Batas Maksimum Pemberian Kredit (BMPK) Bank Umum yang dilakukan secara periodik;
- Melakukan perhitungan Rasio Pembiayaan Inklusif Makroprudensial untuk Konvensional dan UUS sesuai yang diatur pada Peraturan Nomor 24/3/PBI/2022 Tentang Rasio Pembiayaan Inklusif Makroprudensial (RPIM) Bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah;
- Melakukan pemantauan *Risk Appetite* & *Risk Tolerance* untuk rasio NPL Perusahaan, NPL per Segmentasi, Sektor Ekonomi Kredit & Surat Berharga, Debitur Inti, CKPN untuk NPL Bank, CKPN NPL Individual, CKPN NPL Kolektif, Rasio Pembiayaan Inklusif Makroprudensial (RPIM) dan memantau limit sektor ekonomi surat berharga, BMPK pihak terkait dan selain pihak terkait;
- Melakukan uji ketahanan *(stress test)* yang bertujuan untuk mengukur potensi terjadinya *Non-Performing Loan* yang berpotensi terjadi penambahan pembentukan CKPN, dan menguji kemampuan ketahanan modal dalam menutup potensi terjadinya kerugian.

Dari sisi operasional, Perusahaan melakukan beberapa upaya untuk meminimalkan risiko operasional yang berasal dari sumber-sumber risiko antara lain:

- Proses Internal: Melakukan kaji ulang berkala terhadap kebijakan, prosedur, melakukan proses *risk assurance* terhadap aktivitas operasional Perusahaan, memberikan rekomendasi perbaikan serta monitoring terhadap implementasinya, serta melakukan tindak lanjut atas hasil audit internal/eksternal.

- Gradually the Company seeks to increase the formation of allowance for non performing loan to reach 100% to mitigate the potential risk of loss caused by non-performing loans due to a decrease in the debtor's ability to pay or default;
- The Company made adjustments of internal policies in terms of handling Covid-19 restructuring loans after the end of restructuring stimulus and removal of Covid-19 restructuring tagging;
- Periodically monitor the Provision of Funds to relevant parties and non-relevant parties as stipulated in the OJK provisions on the Maximum Legal Lending Limit (LLL) for Commercial Banks;
- Calculate the Macroprudential Inclusive Financing Ratio for Conventional and UUS as stipulated in Regulation Number 24/3/PBI/2022 concerning the Macroprudential Inclusive Financing Ratio (RPIM) for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units;
- Monitor Risk Appetite & Risk Tolerance for the Company's NPL ratio, NPL per Segmentation, Economic Sector of Loans & Securities, Core Debtors, Allowance for Impairment Losses for Company's NPL, Allowance for Impairment Losses for Individual NPL, Allowance for Impairment Losses for Collective NPL, Macroprudential Inclusive Financing Ratio (RPIM) and monitoring limits for the economic sector of securities, LLL for relevant parties and non- relevant parties;
- Conduct stress tests that aim to measure the potential impact of Non-Performing Loans that potentially lead for additional allowance for impairment assets provision, and test the ability of capital resilience to cover potential losses.

From an operational perspective, the Company makes several efforts to minimize operational risk from risk sources, including:

- Internal Process: Conduct periodic reviews of policies, procedures, carry out risk assurance processes for the Company's operational activities, provide recommendations for improvement and monitoring of its implementation, as well as follow up on the results of internal/external audit.

- Sistem dan Teknologi: Penerapan proses manajemen risiko dalam penggunaan Teknologi Informasi telah dilaksanakan secara memadai dalam hal pengelolaan pengamanan informasi, pengamanan terhadap data Perusahaan, dan uji coba terhadap pengembangan sistem aplikasi.

- Manusia: Perusahaan memastikan kecukupan kuantitas SDM yang diperlukan dan secara berkala berupaya meningkatkan kualitas sumber daya manusia melalui pelatihan, sosialisasi, *refreshment risk/fraud awareness* serta Deklarasi Anti Fraud dan Pakta Integritas yang dilakukan secara *online*.

- Faktor eksternal: Perusahaan melakukan pengkinian pedoman bagi pengelolaan kelangsungan usaha yang komprehensif dengan tujuan untuk mengantisipasi risiko operational yang mungkin terjadi dari situasi darurat/kritikal karena bencana alam seperti banjir, gempa bumi dan faktor lainnya seperti kebakaran, gangguan sistem melalui *Business Continuity Management* (BCM) dan *Disaster Recovery Center* (DRC).

Selama Semester II – Desember 2024, seluruh aktivitas operasional Perusahaan terkendali dan berjalan dengan baik. Perusahaan semakin memperkuat permodalan tercermin dengan jumlah modal secara konsolidasi dengan perusahaan anak sebesar Rp8,3 Triliun dan KPMM sebesar 31,20% pada tanggal 31 Desember 2024.

Perusahaan melakukan pengelolaan terhadap 8 (delapan) jenis risiko, yang antara lain sebagai berikut:

**Risiko Kredit**

Risiko kredit adalah risiko yang terjadi akibat kegagalan pihak lawan (*counterparty*) memenuhi liabilitasnya, yang timbul dari aktivitas fungsional Perusahaan seperti perkreditan (penyediaan dana), *treasury*, investasi dan pembiayaan perdagangan (*trade finance*).

Dalam mengelola risiko kredit, Perusahaan menetapkan limit agar eksposur kredit sesuai dengan *appetite* yang telah ditentukan. Ketentuan limit dibedakan antar setiap segmentasi yaitu *Corporate*, C*hanneling/Joint Financing*, Lembaga Keuangan, Mikro, Usaha Kecil dan Menengah (SME), Komersial dan Konsumsi.

- System and Technology: The implementation of risk management processes in the use of Information Technology has been carried out adequately in terms of managing information security, securing the Company's data, and testing the development of application systems.

- Humans: The Company ensures the adequacy of the required quantity of human resources and periodically seeks to improve the quality of human resources through online training, socialization, refreshment risk/fraud awareness as well as the online Anti-Fraud Declaration and Integrity Pact.

- External factors: The Company has updated guidelines for comprehensive business continuity management with the aim of anticipating operational risks that may occur from emergency/critical situations due to natural disasters such as floods, earthquakes and other factors such as fires, system disturbances through Business Continuity Management (BCM) and Disaster Recovery Center (DRC).

During Second Semester – December 2024, all operational activities of the Company were under control and running smoothly. The Company further strengthened its capital, reflected in the consolidated capital amount with subsidiary as of Rp8.3 trillion and CAR as of 31.20% as of December 31, 2024.

The Company manages 8 (eight) risks as follows:

**Credit Risk**

Credit risk is the risk that occurs as a result of failure of the counterparty to meet its obligations, which arise from the Company's functional activities such as credit (provision of funds), treasury, investment and trade finance.

In managing credit risk, the Company sets limits so that credit exposure is in accordance with the appetite that has been determined. Limit provisions are differentiated between each segment, namely Corporate, Channeling/Joint Financing, Financial Institutions, Micro, Small and Medium Enterprises (SME), Commercial and Consumption.

*Risk Management Group (*Satuan Kerja Manajemen Risiko) berupaya secara bertahap menyempurnakan metodologi identifikasi, pengukuran, pemantauan dan pelaporan informasi risiko yang efektif, dan mengkaji secara berkala kerangka manajemen risiko yang ada untuk meminimalisasi berbagai risiko usaha yang dihadapi.

The Risk Management Group seeks to gradually refine the methodology for effective identification, measurement, monitoring and reporting of risk information, and periodically reviews the existing risk management framework to minimize the various business risks it faces.

Perbaikan dan penyemperunaan dalam proses kredit Bank diungkapkan pada Notes 50i.

Improvements in the credit process is disclosed in Note 50i.

Risiko kredit dikelola melalui penetapan kebijakan-kebijakan dan proses-proses yang meliputi kriteria pemberian kredit dan persetujuan kredit, penetapan harga, pemantauan, pengelolaan kredit bermasalah dan manajemen portofolio.

Credit risk is managed through the establishment of policies and processes covering criteria for granting credit and credit approval, pricing, monitoring, managing non-performing loans and portfolio management.

Perusahaan telah memiliki kebijakan dan pedoman tertulis terkait dengan kegiatan perkreditan yang antara lain, mengatur prosedur analisa kredit, persetujuan kredit, pencatatan dan pengawasan kredit, dan restrukturisasi kredit. Kebijakan dan prosedur tersebut dievaluasi/dikaji secara berkala untuk disesuaikan perubahan kondisi serta arah kebijakan Perusahaan agar potensi risiko dapat dimitigasi.

The Company has written policies and guidelines on its lending activities in order to manage, among others, credit analysis procedures, credit approval procedures, credit recording and monitoring procedures, and credit restructuring. These policies and procedures are evaluated or reviewed periodically to adjust on the changing conditions and direction of the Company's policies so that potential risks can be mitigated.

Proses pemantauan kualitas kredit sampai dengan penanganan kredit bermasalah terus ditingkatkan dengan berbagai strategi yang dimonitor secara periodik untuk memastikan agar kualitas portofolio kredit tetap terjaga. Pengelolaan kredit yang efektif dapat meminimalkan kerugian dan mengoptimalkan penggunaan modal yang dialokasikan untuk risiko kredit. Selain itu, mengelola sumber daya manusia secara kuantitas dan kualitas, serta mempersiapkan kebijakan dan prosedur kerja.

The process of monitoring credit quality up to handling non-performing loans continues to improve with various strategies that are monitored periodically to ensure that the quality of the loan portfolio is maintained. Effective credit management can minimize losses and optimize the use of capital allocated for credit risk. In addition, managing human resources in quantity and quality, as well as preparing work policies and procedures.

Proses *underwriting* kredit telah dikaji ulang dengan melakukan revisi maupun menerbitkan beberapa kebijakan perkreditan di setiap segmen kredit termasuk kewenangan dalam memutus kredit, *monitoring* kredit, ketentuan penanganan kredit/pembiayaan yang terdampak penyebaran Covid-19 dan lainnya.

The credit underwriting process has been reviewed by revising or issuing several credit policies in each credit segment including the authority to decide credit, credit monitoring, provisions for handling credit/financing affected by the spread of Covid-19 and others.

Selain itu, untuk mendukung pertumbuhan kredit yang sehat, Perusahaan juga mengadakan *training* dan *workshop* antara lain mengenai *Sharing Session* Analisa Kredit SME *Loan*, *Loan* di T24, Analisa Pembiayaan SME Syariah, Metode & Analisa Keuangan, *Benefial Owner* dan *Multiple Device*, Mekanisme Penghapusan Hak Tanggungan (Roya) dalam Proses Pengambilalihan Kredit *(Takeover)*, Analisis Kredit SME, Kredit Pemilikan Rumah (KPR) Bank Sinarmas melalui Simobiplus*, Supply Chain Financing Part Pega SCF, Upgrading Knowledge Credit Process and Documentation,*

In addition, to support healthy credit growth, the Company also conducts training and workshops, including topics such as Sharing Session on SME Loan Credit Analysis, Loans at T24, Sharia SME Financing Analysis, Financial Methods & Analysis, Beneficial Owner and Multiple Device, Mechanism for the Elimination of Dependent Rights (Roya) in the Credit Takeover Process, SME Credit Analysis, Bank Sinarmas's Home Ownership Loans (KPR) through Simobiplus, Supply Chain Financing Part Pega SCF, Upgrading Knowledge Credit Process and Documentation, Primary Mortgage Financing

*Proses Underwriting* Pembiayaan KPR *Primary,* Sosialisasi Kredit Mikro*, Intro to Commercial Credit Analysis, Credit Risk and Lending,* dan *Banking Credit Analysis Process, Practical Loan Recovery Up Skill, Banking Credit Analysiss Process,* Mekanisme Proses *Adjustment* Kolektibilitas, Analisis RA/RT, Sektor Ekonomi dan BMPK, *Refreshment: Early Warning System,* Bedah Kasus dan Diskusi Penilaian Agunan *Internal Collateral Valuation Department,* Program Teknik dan Validasi Kredit; Pembiayaan SMMF; *Multifinance Business*, Akad Pembiayaan di Bank Syariah, *Workshop Appraisal and Credit Analyst,* Perhitungan Modal KPMM, *Sharing Session* Mengenai Alur Proses Pencairan KPM di *Processing,* Pembahasan Tentang Kredit Bermasalah Kolektibilitas 1 & 2, Tata Cara Perhitungan CKPN Kredit, *Trade Finance dan Upgrading Knowledge Credit Process and Documentation*, mekanisme Pelaksanaan Penilaian Agunan Pada *Micro Loan*, Analisis Kredit SME, Penilaian Jaminan, Analisa Sawit, Penerbitan Bank Garansi Melalui Media Swift, *Refreshment* Proses Analisa Kredit MSME, Sosialisasi Katalog AYDA, Pembangkit Listrik Tenaga Micro Hydro (PLTMH), Pembiayaan Pekerjaan Migran, dan *Sharia Restricted Investment Account* (SRIA).

Underwriting Process, Micro Credit Socialization, Intro to Commercial Credit Analysis, Credit Risk and Lending, and Banking Credit Analysis Process, Practical Loan Recovery Up Skill, Banking Credit Analysiss Process, Collectibility Adjustment Process Mechanism, RA/RT Analysis, Economic Sector and LLL, Refreshment: Early Warning System, Case Study and Discussion on Internal Collateral Valuation Assessment, Credit Engineering and Validation Program; SMMF Financing; Multifinance Business, Financing Agreement in Islamic Bank, Workshop on Appraisal and Credit Analyst, CAR Calcutation, Sharing Session on KPM Disbursement Process in Processing, Discussion on Problematic Loans with Collectibility 1 & 2, Procedures for Allowance Of Impairment Loss of Credit Calculation, Trade Finance and Upgrading Knowledge on Credit Process and Documentation, Mechanism for Collateral Valuation Implementation on Micro Loans, SME Credit Analysis, Collateral Assessment, Palm Oil Analysis, Issuance of Bank Guarantees through Swift Media, Refreshment on MSME Credit Analysis Process, Socialization of Foreclosed Assets Catalog, Micro Hydro Power Plant (PLTMH), Financing for Migrant Workers, and Sharia Restricted Investment Account (SRIA).

Dalam penerapan transformasi digital yang berdampak pada proses c*redit underwriting*, Perusahaan telah memiliki *risk strategy* untuk setiap produk *digital loan* yang dituangkan ke dalam *Credit Risk Engine* dan telah dilakukan implementasi *One Limit System* untuk mengukur *repayment capacity* setiap *applicant* serta dilakukan analisa *performance monitoring*. Perusahaan juga telah melakukan tinjauan atas *scoring model* yang telah digunakan, melakukan pengembangan *scoring model* baru baik dengan metode statistik ataupun *expert judgement* dan dilakukan validasi model, serta monitoring model secara berkala. Selain itu, Perusahaan juga telah melakukan *assessment* atas Metodologi *Credit Rating* untuk debitur *Corporate* sebagai tindak lanjut atas hasil pemeriksaan OJK.

In the implementation of digital transformation that has an impact on the credit underwriting process, the Company has a risk strategy for each digital loan product that is poured into the Credit Risk Engine and has implemented the One Limit System to measure the repayment capacity of each applicant and perform performance monitoring analysis. The company has also reviewed the scoring models that have been used, developed new scoring models either by statistical methods or expert judgement and validated the models, as well as monitored the models periodically. In addition, the Company has also conducted an assessment of the Credit Rating Methodology for Corporate debtors as a follow-up to the results of the OJK's inspection.

Perusahaan telah menyusun strategi dan *action plan* untuk aktivitas perkreditan, yang akan lebih fokus pada debitur saat ini *(exist)* terutama yang terdampak dan akselerasi proses restrukturisasi bagi debitur yang terdampak, dan memberikan penyaluran kredit kepada debitur-debitur yang memiliki jaminan/agunan yang memadai dan dan sektor-sektor yang masih memiliki prospek usaha.

The Company had prepared strategies and action plans for lending activities, which will be focused more on existing debtors especially those affected, and accelerate the restructuration process for affected debtors, and selectively applying disbursement restrictions on unused credit facility and providing credit disbursements to debtors who have adequate collateral and sectors which still holds business prospects.

Dalam hal penanganan pembiayaan bermasalah, Perusahaan telah melakukan sejumlah *action* diantaranya melakukan restrukturisasi kredit, eksekusi hak tanggungan, pengambilalihan agunan dan pemasaran jaminan melalui media *digital* dan *non digital*.

In terms of handling non-performing loan, the Company has taken a number of actions including restructuring credit, executing mortgage rights, foreclosed assets, and marketing of collateral through digital and non-digital media.

Perusahaan telah mengimplementasikan PSAK No. 109 dalam hal pembentukan cadangan kerugian penurunan nilai kredit sesuai dengan penetapan Dewan Standar Akuntansi Keuangan Ikatan Akuntan Indonesia (DSAK IAI). Perusahaan telah membangun infrastruktur dan sistem IT yang dapat melakukan proses klasifikasi dan pengukuran, perhitungan penurunan nilai (kolektif dan individu), serta Pengungkapan Laporan. Cakupan penurunan nilai berdasarkan PSAK No. 109 telah memperhitungkan kerugian di masa mendatang (*expected credit loss model*).

The Company has implemented SFAS No. 109 in terms of allowance for impairment losses on credit in accordance with the decree of the Financial Accounting Standards Board of the Indonesian Institute of Accountants (DSAK IAI). The Company has built IT infrastructure and systems that can perform Classification and Measurement process, Impairment calculations (collective and individual), and Disclosure for Reporting. The scope for impairment under SFAS No. 109 has taken into account future losses (expected credit loss model).

Cadangan kerugian penurunan nilai (CKPN) dengan menggunakan metode *Expected Credit Loss* sesuai dengan ketentuan PSAK No. 109 menghitung penurunan nilai pada Portofolio (1) Kredit; (2) *Treasury*; (3) *Trade Finance* baik untuk o*n balance sheet* maupun *off balance sheet* setiap bulan. Perusahaan melakukan pemodelan PD, LGD, EAD dan *Forward Looking Macroeconomic Information* untuk semua segmentasi portofolio instrumen keuangan sesuai dengan metodologi yang telah ditentukan oleh Perusahaan.

The allowances for impairment losses using the Expected Credit Loss method in accordance with SFAS No. 109 provisions calculate the impairment of the Portfolio (1) Credit; (2) Treasury; (3) Trade Finance on both on balance sheet and off-balance sheet every month. The Company is conducting modeling of PD, LGD, EAD, and Forward-Looking Macroeconomic Information for all segmentation of financial instrument portfolios in accordance with the methodology determined by the Company.

Pengukuran Cadangan Kerugian Kredit Ekspektasian

Allowances for Expected Credit Losses Measurement

Perusahaan mengacu pada PSAK No. 109 yang memperkenalkan metode kerugian kredit ekspektasian dalam mengukur kerugian instrumen keuangan akibat penurunan nilai. PSAK No. 109 mensyaratkan pengakuan segera atas dampak perubahan kerugian kredit ekspektasian setelah pengakuan awal aset keuangan. Perusahaan mengembangkan permodelan parameter risiko seperti PD, LGD dan EAD yang digunakan sebagai komponen perhitungan kerugian kredit ekspektasian.

The Company refers to SFAS No. 109 which introduces the expected credit loss method of measuring the loss on a financial instrument due to impairment. SFAS No. 109 requires immediate recognition of the effect of changes in expected credit losses after the initial recognition of the financial asset. The Company develops risk parameter modeling such as PD, LGD, and EAD which are used as components of calculating expected credit losses.

PSAK No. 109 mensyaratkan entitas untuk mengelompokkan aset keuangan ke dalam tiga tahapan (tahap 1, tahap 2 dan tahap 3) dengan menentukan apakah terjadi peningkatan risiko kredit yang signifikan. Perusahaan mengukur cadangan kerugian sejumlah kerugian kredit ekspektasian 12 bulan untuk aset keuangan yang memiliki risiko kredit rendah pada tanggal pelaporan (tahap 1) dan kerugian kredit sepanjang umur untuk aset keuangan yang mengalami peningkatan risiko kredit yang signifikan (tahap 2 dan tahap 3). Pada setiap tanggal pelaporan, entitas menilai apakah risiko kredit atas instrumen keuangan telah meningkat secara signifikan sejak pengakuan awal. Dalam melakukan penilaian tersebut, entitas membandingkan risiko gagal bayar pada saat pengakuan awal serta mempertimbangkan informasi yang wajar dan terdukung yang tersedia tanpa biaya atau upaya berlebihan, yang merupakan indikasi peningkatan risiko kredit secara signifikan (SICR) sejak pengakuan awal.

SFAS No. 109 requires entities to classify financial assets into three stages (stage 1, stage 2 and stage 3) by determining whether there is a significant increase in credit risk. The Company measures the allowance for expected credit losses on 12 months credit loss for financial assets with low credit risk at the reporting date (stage 1) and lifetime expected credit losses for financial assets with a significant increase in credit risk (stage 2 and stage 3). At each reporting date, the entity assesses whether the credit risk on the financial instrument has increased significantly since initial recognition. In making that assessment, an entity compares the risk of default on initial recognition and considers reasonable and supportable information available without undue cost or effort, which is an indication of a significant increase in credit risk (SICR) since initial recognition.

Berikut adalah eksposur maksimum instrumen keuangan dalam laporan posisi keuangan dan rekening administratif yang terkait risiko kredit pada tanggal 31 Desember 2024 dan 2023:

The maximum exposure of financial instruments related to credit risk as shown in the statement of financial position as of December 31, 2024 and 2023 follows:

| | 2024 | | | | | |
|---|---|---|---|---|---|---|
| | Tahap 1/ *Stage 1* | Tahap 2/ *Stage 2* | Tahap 3/ *Stage 3* | Syariah/ *Sharia* | Jumlah/ *Total* | |
| **Laporan Posisi Keuangan** | | | | | | **Statements of Financial Position** |
| *Diukur pada nilai wajar melalui laba rugi* | | | | | | *At Fair value through profit and loss* |
| Efek-efek | | | | | | Securities |
| Reksadana | 1.977.049 | - | - | - | 1.977.049 | Mutual funds |
| Aset lain-lain | | | | | | Other assets |
| Piutang derivatif | 1.855 | - | - | - | 1.855 | Derivatif receivables |
| *Diukur pada nilai wajar melalui penghasilan komprehensif lain* | | | | | | *At Fair value through other* comprehensive income |
| Efek-efek | | | | | | Securities |
| Obligasi korporasi | 4.399.308 | - | 463.814 | - | 4.863.122 | Corporate bonds |
| *Diukur pada biaya perolehan dimortisasi* | | | | | | *Measured at amortized cost* |
| Giro pada bank Indonesia | 4.694.100 | - | - | 1.012.337 | 5.706.437 | Demand deposits with Bank Indonesia |
| Giro pada bank lain - neto | 1.883.517 | | | 137.472 | 2.020.989 | Demand deposits with other banks - net |
| Penempatan pada Bank Indonesia dan bank lain - neto | 8.281.976 | - | - | 444.000 | 8.725.976 | Placements with other bank Indonesia and other banks - net |
| Efek-efek - neto | | | | | | Securities - net |
| Obligasi korporasi | 101.111 | - | - | 67.875 | 168.986 | Corporate bonds |
| Tagihan atas wesel ekspor | 32.820 | - | - | - | 32.820 | Export bills receivable |
| Sertifikat pengelolaan dana berdasarkan prinsip syariah | - | - | - | 250.000 | 250.000 | Sharia complant interbank fund management certificate |
| Sertifikat investasi mudharabah antarbank syariah | - | - | - | 400.000 | 400.000 | Interbank mudharabah investment certificate |
| Kredit yang diberikan (termasuk pembiayaan prinsip syariah) | 10.280.336 | 690.966 | 210.422 | 3.174.079 | 14.355.803 | Loan (including financing based on sharia principles) |
| Tagihan akseptasi | 38.144 | - | - | - | 38.144 | Acceptance receivable |
| Pendapatan yang masih akan diterima | 272.974 | - | - | 132.117 | 405.091 | Acrued income |
| Aset lain-lain | 123.626 | - | - | - | 123.626 | Other assets |
| **Jumlah** | **32.086.816** | **690.966** | **674.236** | **5.617.880** | **39.069.898** | **Total** |
| **Komitmen dan Kontinjensi** | | | | | | **Commitment and Contingencies** |
| Fasilitas kredit kepada debitur yang belum digunakan | 512.494 | - | - | - | 512.494 | Unused loan commitment to debtor |
| Bank garansi | 789.206 | - | - | 250 | 789.456 | Bank guarantee |
| Irrevocable letters of credit | 29.011 | - | - | - | 29.011 | Irrevocable letters of credit |
| **Jumlah** | **1.330.711** | **-** | **-** | **250** | **1.330.961** | **Total** |

| | 2023 | | | | | |
|---|---|---|---|---|---|---|
| | Tahap 1/ *Stage 1* | Tahap 2/ *Stage 2* | Tahap 3/ *Stage 3* | Syariah/ *Sharia* | Jumlah/ *Total* | |
| **Laporan Posisi Keuangan** | | | | | | **Statements of Financial Position** |
| *Diukur pada nilai wajar melalui laba rugi* | | | | | | *At Fair value through profit and loss* |
| Efek-efek | | | | | | Securities |
| Reksadana | 2.007.589 | - | - | - | 2.007.589 | Mutual funds |
| Aset lain-lan | | | | | | Other assets |
| Piutang derivatif | 27.502 | - | - | - | 27.502 | Derivatif receivables |
| *Diukur pada nilai wajar melalui penghasilan komprehensif lain* | | | | | | *At Fair value through other* comprehensive income |
| Efek-efek | | | | | | Securities |
| Obligasi korporasi | 6.160.841 | - | - | - | 6.160.841 | Corporate bonds |
| *Diukur pada biaya perolehan dimortisasi* | | | | | | *Measured at amortized cost* |
| Giro pada bank lain - pihak ketiga | 2.656.867 | - | - | - | 2.656.867 | Demand deposits with other banks |
| Penempatan pada bank lain | 146.272 | - | - | - | 146.272 | Placements with other banks |
| Efek-efek | | | | | | Securities |
| Obligasi korporasi | 97.103 | - | - | 10.212 | 107.315 | Corporate bonds |
| Tagihan atas wesel ekspor | 39.147 | - | - | - | 39.147 | Export bills receivable |
| Kredit yang diberikan (termasuk pembiayaan prinsip syariah) | 10.447.656 | 1.145.890 | 110.414 | 5.167.486 | 16.871.446 | Loan (including financing based on sharia principles) |
| Tagihan akseptasi | 79.864 | - | - | - | 79.864 | Acceptance receivable |
| Pendapatan yang masih akan diterima | 300.579 | - | - | 26.172 | 326.751 | Acrued income |
| Aset lain-lain | 141.121 | - | - | - | 141.121 | Other assets |
| **Jumlah** | **22.104.541** | **1.145.890** | **110.414** | **5.203.870** | **28.564.715** | **Total** |
| **Komitmen dan Kontinjensi** | | | | | | **Commitment and Contingencies** |
| Fasilitas kredit kepada debitur yang belum digunakan | 474.753 | - | - | - | 474.753 | Unused loan commitment to debtor |
| Bank garansi | 924.115 | - | - | - | 924.115 | Bank guarantee |
| Irrevocable letters of credit | 103.015 | - | - | - | 103.015 | Irrevocable letters of credit |
| **Jumlah** | **1.501.883** | **-** | **-** | **-** | **1.501.883** | **Total** |

Eksposur maksimum risiko kredit tercermin dari persentase setiap kategori kredit yang diberikan terhadap jumlah kredit. Portofolio kredit yang diberikan terdiversifikasi ke dalam 23 jenis sektor ekonomi, dimana untuk posisi 31 Desember 2024, kelompok sektor ekonomi yang memperoleh penyaluran kredit terbesar dari Perusahaan adalah sektor ekonomi Perdagangan Besar dan Eceran, Reparasi dan Perawatan Mobil dan Sepeda Motor, dan sektor ekonomi Rumah Tangga.

The credit risk maximum exposure is reflected in the percentage of each category of loan to total loan. The Loans portfolio is diversified into 23 types of economic sectors, wherein as of December 31, 2024, Wholesale and Retail Trades, Repair and maintenance of Cars and Motorcycles economic sector, and Households economic sector obtained the largest loans from the Company.

Sebagai bagian dari manajemen portofolio, Perusahaan juga melakukan pemantauan perkembangan risiko portofolio kredit melalui perhitungan *Credit Risk Profile* yang menggambarkan potensi risiko bawaan dan efektivitas kualitas penerapan manajemen risiko. Perusahaan juga melakukan monitoring perkembangan dan kualitas portofolio berdasarkan konsentrasi per kategori portofolio, 25 debitur besar, sektor industri, sektor wilayah, jenis produk, tujuan penggunaan, dan jenis valuta.

As part of portfolio management, the Company also monitors the development of credit portfolio risk through of the calculation of Credit Risk Profile that describes the potential inherent risks and the effectiveness of risk management quality implementation. The Company also monitors the development and quality of the portfolio based on portofolio category concentration, 25 largest debtors, industrial sector, region, product type, purpose of use, and the type of currency.

Dengan demikian, Perusahaan dapat mengambil langkah-langkah antisipasi dan mitigasi risiko secara portofolio maupun secara individu dan juga melalui penyempurnaan proses penerapan manajemen risiko kredit, baik melalui penyempurnaan kebijakan perkreditan maupun pengembangan sistem informasi kredit yang memadai.

Accordingly, the Company can take anticipatory measures and risk mitigation in the portfolio as well as individually and also through improvements in credit risk management implementation process, through both improvement of credit policies and the development of adequate credit information system.

Dalam hal adanya revisi standar pemenuhan modal minimum untuk risiko kredit sebagaimana diatur dalam standar Basel III: *Finalizing Post Crisis Reforms* (Basel III *Reforms*) yang diterbitkan oleh *Basel Committee on Banking Supervision* (BCBS), Perusahaan telah mengimplementasikan Laporan Perhitungan ATMR Risiko Kredit dengan Pendekatan Standar sejak 1 Januari 2023.

In the event of revision on the minimum capital compliance standard for credit risk as stipulated in the Basel III standard: Finalizing Post Crisis Reforms (Basel III Reforms) issued by the Basel Committee on Banking Supervision (BCBS), the Company has implemented the Credit Risk ATMR Calculation Report with a Standard Approach since January 1, 2023.

Berikut adalah eksposur risiko kredit atas aset Perusahaan (termasuk kredit yang diberikan berdasarkan prinsip syariah) pada tanggal 31 Desember 2024 dan 2023:

The credit risk exposure related to Company's assets (including loans provided based on sharia principles) is as follow as of December 31, 2024 and 2023 is as follows:

| | 2024 | | | |
|---|---|---|---|---|
| | Belum Jatuh Tempo dan Tidak Mengalami Penurunan Nilai/ *Neither Past Due Nor Impaired* | Mengalami Penurunan Nilai/ *Impaired* | Jumlah/ *Total* | |
| Giro pada bank Indonesia | 5.706.437 | - | 5.706.437 | Demand deposits with bank Indonesia |
| Giro pada bank lain - neto | 2.020.989 | - | 2.020.989 | Demand deposits with other banks - net |
| Penempatan pada bank Indonesia dan bank lain - neto | 8.725.976 | - | 8.725.976 | Placements with bank Indonesia and other banks - net |
| Efek-efek | | | | Securities |
| Diukur pada nilai wajar melalui laporan laba rugi | 1.977.049 | - | 1.977.049 | At fair value through profit and loss |
| Diukur pada biaya perolehan diamortisasi | 851.807 | - | 851.807 | Measured at amortized cost |
| Diukur pada nilai wajar penghasilan komprehensif lainnya | 4.399.307 | 463.814 | 4.863.121 | At fair value through other comprehensive income |
| Kredit yang diberikan | 14.138.123 | 217.680 | 14.355.803 | Loans |
| Tagihan akseptasi | 38.144 | - | 38.144 | Acceptance receivable |
| Pendapatan yang masih akan diterima | 405.091 | - | 405.091 | Accrued income |
| Aset lain-lain | 123.626 | - | 123.626 | Other assets |
| **Jumlah** | **38.386.549** | **681.494** | **39.068.043** | **Total** |

| | 2023 | | | |
|---|---|---|---|---|
| | Belum Jatuh Tempo dan Tidak Mengalami Penurunan Nilai/ *Neither Past Due Nor Impaired* | Mengalami Penurunan Nilai/ *Impaired* | Jumlah/ *Total* | |
| Giro pada bank lain | 2.656.867 | - | 2.656.867 | Demand deposits with other banks |
| Penempatan pada bank lain | 146.272 | - | 146.272 | Placements with other banks |
| Efek-efek | | | | Securities |
| Diukur pada nilai wajar melalui laporan laba rugi | 2.007.589 | - | 2.007.589 | At fair value through profit and loss |
| Diukur pada biaya perolehan diamortisasi | 97.103 | - | 97.103 | Measured at amortized cost |
| Diukur pada nilai wajar penghasilan komprehensif lainnya | 6.815.324 | 472.760 | 7.288.084 | At fair value through other comprehensive income |
| Kredit yang diberikan | 16.611.442 | 260.004 | 16.871.446 | Loans |
| Tagihan akseptasi | 79.864 | - | 79.864 | Acceptance receivable |
| Pendapatan yang masih akan diterima | 326.751 | - | 326.751 | Accrued income |
| Aset lain-lain | 141.121 | - | 141.121 | Other assets |
| **Jumlah** | **28.882.333** | **732.764** | **29.615.097** | **Total** |

## Risiko Pasar

Dalam melaksanakan aktivitasnya, Perusahaan terekspos pada risiko pasar yang terdiri atas risiko suku bunga dan risiko nilai tukar. Risiko pasar antara lain terdapat pada aktivitas fungsional Perusahaan seperti kegiatan *treasury* dan investasi dalam surat berharga dan pasar uang, kegiatan pendanaan dan penerbitan surat utang, serta kegiatan pembiayaan perdagangan. Perusahaan senantiasa melakukan pengelolaan terhadap risiko pasar tersebut secara rutin dan/atau berkala.

Pemantauan dan pengukuran terhadap risiko pasar dilakukan secara harian, mingguan, bulanan dan triwulan antara lain pemantauan posisi surat berharga yang dimiliki Perusahaan, Posisi Devisa Neto (PDN), *Value at Risk* (VaR) nilai tukar, *Present Value of One Basis Poin Changes* (PV01), *Interest Rate Risk in Banking Book* (IRRBB), *Unrealized Profit/Loss*, serta *Holding Period* dan *Off Market Rate* (OMR), ATMR risiko pasar serta pemantauan terhadap limit-limit yang telah ditetapkan Perusahaan dan *Regulator*.

Selain itu Perusahaan secara berkala melakukan perhitungan *stress test* terkait risiko suku bunga, risiko nilai tukar dan risiko harga dengan 3 jenis skenario dan asumsi yaitu Skenario *Baseline*, Skenario *Moderate* dan Skenario *Severe* yang menunjukkan kondisi *stressed* dengan memperhatikan kondisi makro ekonomi di pasar serta pergerakan kondisi *stressed* menggunakan data historikal yang pernah terjadi. Asumsi dan/atau skenario serta hasil *stress testing* disampaikan dan disetujui oleh Komite Manajemen Risiko dan/atau Direksi melalui rapat komite manajemen risiko atau melalui sirkulasi Memorandum Internal atau melalui *e-mail*.

## Market Risk

In conducting its activities, the Company is exposed to market risk consisting of interest rate risk and foreign exchange risk. Market risk, among others exist in the functional activity of the Company, such as treasury activities and investments in securities and money markets, financing activities and the issuance of debt and trade financing activities (trade finance). The Company always managing the management of market risk on a regular basis and/or periodically.

Monitoring and measurement of market risk are conducted daily, weekly, monthly, and quarterly, including the monitoring of the positions of securities held by the Company, Net Open Position (NOP), Value at Risk (VaR) of exchange rates, Present Value of One Basis Point Changes (PV01), Interest Rate Risk in the Banking Book (IRRBB), Unrealized Profit/Loss, as well as Holding Period and Off Market Rate (OMR), ATMR market risk, and monitoring of the limits established by the Company and Regulator.

In addition, the Company periodically calculates stress tests related to interest rate risk, exchange rate risk and price risk with 3 types of scenarios and assumptions, namely Baseline Scenario, Moderate Scenario and Severe Scenario which show stressed conditions by taking into account macroeconomic conditions in the market and movements of stressed conditions using historical data that has occurred. Assumptions and/or scenarios and results of stress testing are submitted and approved by the Risk Management Committee and/or Board of Directors through risk management committee meetings or through the circulation of Internal Memorandums or via e-mail.

**a. Risiko Suku Bunga**

Risiko Suku Bunga dalam buku Bank atau *Interest Rate Risk in The Banking Book* (IRRBB) merupakan risiko akibat pergerakan suku bunga di pasar yang berlawanan dengan posisi *Banking Book*, yang berpotensi memberikan dampak terhadap permodalan dan rentabilitas (*earnings*) Perusahaan baik untuk saat ini maupun pada masa mendatang.

Penerapan manajemen risiko suku bunga pada *Interest Rate Risk in The Banking Book* (IRRBB) diterapkan untuk mengidentifikasi, mengukur, dan memantau serta mengendalikan pergerakan suku bunga yang dapat menyebabkan perubahan pada nilai kini dan penetapan waktu arus kas pada masa mendatang yang mempengaruhi nilai ekonomis dari aset, liabilitas, dan transaksi rekening administratif serta menyebabkan perubahan pada pendapatan bunga bersih. Risiko suku bunga dalam *Interest Rate Risk in The Banking Book* (IRRBB) diukur berdasarkan dampak perubahan suku bunga terhadap perubahan nilai ekonomis dari ekuitas (*Economic Value of Equity*/EVE) dan perubahan pada pendapatan bunga bersih (*Net Interest Income*/NII).

Pengukuran dan Pemantauan risiko suku bunga atau *Interest Rate Risk in The Banking Book* (IRRBB) dilakukan secara individu yaitu Bank Sinarmas selaku perusahaan induk, dan secara konsolidasi yaitu antara perusahaan induk dan entitas anak, yaitu Bank Nano Syariah. Rasio IRRBB berdasarkan pendekatan EVE dan NII posisi Triwulan IV – Desember 2024 masing-masing sebesar 6,8% (Individu) dan 7,4% (Konsolidasi), dan NII sebesar 19,2% (individu) dan 17,2% (Konsolidasi).

Perusahaan dalam hal pengelolaan risiko suku bunga dilengkapi dengan analisa sensitivitas secara periodik untuk mengukur dampak dari perubahan suku bunga yang signifikan. Selain itu, Perusahaan telah menetapkan *Risk Appetite* dan *Risk Tolerance* untuk Risiko Suku Bunga yaitu risiko suku bunga terhadap perubahan nilai ekonomis dari nilai ekuitas (EVE) dan perubahan pada pendapatan bunga neto (NII). Saat ini Perusahaan sedang dalam tahap *testing* sistem terkait perhitungan IRRBB yang diantaranya digunakan untuk keperluan pelaporan IRRBB dengan tujuan semua perhitungan dilakukan secara otomasi guna menyampaikan informasi risiko yang akurat, efektif, sesuai ketentuan yang diatur oleh regulator, dan tepat waktu serta meminimalkan potensi terjadinya risiko operasional.

**a. Interest Rate Risk**

Interest Rate Risk in The Banking Book (IRRBB) is a risk due to interest rate movements in the market that are opposite to the Banking Book position, which has the potential to have an impact on the Company's capital and earnings both now and in the future.

The application of Interest Rate Risk in The Banking Book (IRRBB) is to identify, measure, monitor and control interest rate movements that can cause changes in the present value and timing of future cash flows that affect the economic value of assets, liabilities and transaction of administrative accounts and those that causes changes in net interest income. Interest Rate Risk in The Banking Book (IRRBB) is measured based on the impact of changes in interest rates on changes in the economic value of equity (EVE) and changes in net interest income (NII).

The measurement and monitoring of Interest Rate Risk in The Banking Book (IRRBB) is conducted individually by Bank Sinarmas as the parent company, and consolidation between parent company and subsidiary, with Bank Nano Syariah as the subsidiary. The IRRBB ratio based on the EVE and NII approach for the fourth quarter – December 2024 is 6.8% (Individual) and 7.4% (Consolidated), and the NII is 19.2% (Individual) and 17.2% (Consolidated).

The Company, in terms of interest rate risk management, is complemented by periodic sensitivity analysis to measure the impact of significant changes in interest rates. In addition, the Company has established Risk Appetite and Risk Tolerance for Interest Rate Risk, namely interest rate risk to changes in the economic value of equity (EVE) and changes in net interest income (NII). Currently, the Company is in testing phase of the system related to the calculation of IRRBB, which is used for the purposes of IRRBB reporting with the aim that all calculations are carried out automatically in order to convey risk information that is accurate, effective, in accordance with the provisions regulated by the regulator, and timely as well to minimize the potential for operational risks.

Pengelolaan risiko suku bunga dilakukan terhadap posisi instrumen keuangan baik dalam *trading book* maupun *banking book*. Risiko suku bunga dalam *trading book* dihitung dengan pendekatan standar (*standardized approach*) sesuai dengan SEOJK Nomor 23/SEOJK.03/2022 tentang Perhitungan Aset Tertimbang Menurut Risiko (ATMR) untuk risiko pasar bagi Bank Umum yang mulai diberlakukan pada 1 Januari 2024, yaitu meliputi perhitungan beban modal dengan metode *sensitivities based*, perhitungan beban modal untuk risiko gagal bayar/*default risk capital* (DRC), dan tambahan risiko residual/ *Residual Risk Add-On* (RRAO).

The management of interest rate risk is conducted on the positions of financial instruments in both the trading book and the banking book. Interest rate risk in the trading book is calculated using the standardized approach in accordance with SEOJK Number 23/SEOJK.03/2022 regarding the Calculation of Risk-Weighted Assets (RWA) for market risk for Commercial Banks, which will be implemented starting January 1, 2024. This includes the calculation of capital charges using the sensitivities-based method, the calculation of capital charges for default risk capital (DRC), and the additional residual risk (Residual Risk Add-On, RRAO).

Tabel berikut merupakan rata-rata suku bunga efektif per tahun untuk aset dan liabilitas yang signifikan (tidak termasuk akun Syariah):

The following table is an average effective interest rate per annum for the significant assets and liabilities (excluding Sharia accounts):

| | 2024 | | 2023 | | |
|---|---|---|---|---|---|
| | Rupiah | Mata Uang Asing/ *Foreign Currencies* | Rupiah | Mata Uang Asing/ *Foreign Currencies* | |
| | % | % | % | % | |
| Aset | | | | | Assets |
| Penempatan pada Bank Indonesia dan bank lain | 2,80 | 3,77 | 3,50 | 3,67 | Placements with Bank Indonesia and other bank |
| Kredit yang diberikan | 12,03 | 10,00 | 11,09 | 12,19 | Loans |
| Liabilitas | | | | | Liabilities |
| Simpanan | 2,08 | 0,34 | 1,67 | 0,45 | Deposits |
| Simpanan dari bank lain | 3,98 | 0,59 | 3,20 | 0,06 | Deposits from other banks |

Tabel berikut ini menyajikan portofolio Perusahaan (tidak termasuk portofolio yang diperdagangkan) pada nilai tercatatnya, yang dikelompokkan menurut mana yang lebih awal antara tanggal *re-pricing* atau tanggal jatuh tempo kontraktual:

The following table presents the Company's portfolio (excluding the trading portfolio) at their carrying values, which are grouped according to which comes first between the re-pricing date or the contractual maturity date, whichever is earlier:

| | 2024 | | | | | | |
|---|---|---|---|---|---|---|---|
| | Sampai Dengan 1 Bulan/ *1 Month or Less* | > 1 Bulan s.d. 3 Bulan/ *More than 1 Month Until 3 Months* | > 3 Bulan s.d. 1 Tahun/ *More than 3 Months Until 1 Year* | > 1 Tahun s.d. 2 Tahun/ *More than 1 Year Until 2 Years* | > 2 Tahun/ *More than 2 Years* | Jumlah/ *Total* | |
| **Aset** | | | | | | | **Assets** |
| Bunga Mengambang | | | | | | | Floating rate |
| Giro pada bank lain | 1.900.099 | - | - | - | - | 1.900.099 | Demand deposits with other banks |
| Kredit yang diberikan | 80.032 | 731.476 | 4.011.353 | 687.368 | 1.886.898 | 7.397.127 | Loans |
| **Liabilitas** | | | | | | | **Liabilities** |
| Bunga Mengambang | | | | | | | Floating rate |
| Simpanan | 27.392.275 | - | - | - | - | 27.392.275 | Deposits |
| Simpanan dari bank lain | 43.574 | - | - | - | - | 43.574 | Deposits from other banks |

| | 2023 | | | | | | |
|---|---|---|---|---|---|---|---|
| | Sampai Dengan 1 Bulan/ *1 Month or Less* | > 1 Bulan s.d. 3 Bulan/ *More than 1 Month Until 3 Months* | > 3 Bulan s.d. 1 Tahun/ *More than 3 Months Until 1 Year* | > 1 Tahun s.d. 2 Tahun/ *More than 1 Year Until 2 Years* | > 2 Tahun/ *More than 2 Years* | Jumlah/ *Total* | |
| **Aset** | | | | | | | **Assets** |
| Bunga Mengambang | | | | | | | Floating rate |
| Giro pada bank lain | 2.656.867 | - | - | - | - | 2.656.867 | Demand deposits with other banks |
| Kredit yang diberikan | 94.745 | 1.243.963 | 1.720.723 | 1.413.257 | 2.693.240 | 7.165.928 | Loans |
| **Liabilitas** | | | | | | | **Liabilities** |
| Bunga Mengambang | | | | | | | Floating rate |
| Simpanan | 25.149.192 | - | - | - | - | 25.149.192 | Deposits |
| Simpanan dari bank lain | 41.271 | - | - | - | - | 41.271 | Deposits from other banks |

**b. Risiko Nilai Tukar**

Risiko nilai tukar adalah risiko kerugian pada neraca dan rekening administratif yang disebabkan oleh perubahan nilai tukar, termasuk perubahan nilai emas.

Kebijakan pengelolaan risiko nilai tukar berpedoman pada batas Posisi Devisa Neto (PDN) sesuai ketentuan regulator yaitu Perusahaan wajib mengelola dan memelihara PDN paling tinggi 20% dari Modal. Perusahaan juga menyusun *Risk Appetite* dan *Risk Tolerance* risiko pasar yang selaras dengan tujuan strategis Perusahaan yang digunakan sebagai dasar penentuan tingkat risiko yang akan diambil Perusahaan dalam pencapaian sasaran bisnis. Selain itu, pengelolaan risiko nilai tukar secara harian juga dilakukan Perusahaan dengan cara menghitung potensi kerugian yang mungkin timbul sebagai dampak dari adanya perubahan nilai tukar terhadap posisi. Perusahaan menggunakan metode *historical Value at Risk* (VAR) dengan menggunakan 250 data historis pada tingkat kepercayaan 99%. Selain itu Perusahaan secara berkala melakukan pemantauan terkait *Off Market Rate* (OMR) untuk transaksi *foreign exchange* dengan tujuan untuk memastikan rentang harga masih berada pada rentang kuotasi secara normal.

**b. Foreign Exchange Risk**

Exchange rate risk is the risk of losses to balance sheets and administrative accounts caused by changes in exchange rates, including changes in the value of gold.

The foreign exchange risk management policy is guided by the limits of the Net Open Position (NOP) in accordance with regulatory provisions, which state that the Company must manage and maintain the NOP at a maximum of 20% of its Capital. The Company also establishes Risk Appetite and Risk Tolerance for market risks that align with the Company's strategic objectives, which serve as the basis for determining the level of risk the Company will undertake in achieving its business targets. Furthermore, the Company conducts daily foreign exchange risk management by calculating the potential losses that may arise due to fluctuations in exchange rates affecting its positions. The Company employs the historical Value at Risk (VaR) method using 250 historical data points at a confidence level of 99%. Additionally, the Company periodically monitors the Off Market Rate (OMR) for foreign exchange transactions to ensure that the price range remains within normal quotation limits.

**c. Risiko Harga**

Risiko harga merupakan risiko yang timbul sebagai akibat ketidakpastian dalam perubahan harga suatu aset, misalnya pendapatan yang kurang menguntungkan dan sekuritas yang memiliki pendapatan tetap akibat perubahan tingkat suku bunga.

**c. Price Risk**

Price risk is the risk that arises as a result of uncertainty in changes in the price of an asset, for example unprofitable income and securities that have a fixed income due to changes in interest rates.

Dalam hal pengelolaan risiko harga, Perusahaan melakukan pemantauan atas eksposur risiko pasar yang melekat pada portofolio yang dikelola oleh *treasury*, seperti Surat Berharga yang dimiliki Perusahaan khususnya yang terekspos risiko pasar, yaitu Surat Berharga yang dimiliki dalam kategori *Fair Value to Other Comprehensive Income* (FVOCI), *Fair Value Through Profit or Loss* (FVTPL), *Off Market Rate* (OMR), PV01, *Profit & Loss* surat berharga dengan mengacu pada limit-limit yang telah ditetapkan.

In terms of price risk management, the Company monitors the market risk exposure inherent in the portfolio managed by the treasury, such as securities held by the Company, particularly those exposed to market risk, namely securities held in the Fair Value to Other Comprehensive Income (FVOCI) category, Fair Value Through Profit or Loss (FVTPL), Off Market Rate (OMR), PV01, and Profit & Loss of securities, referring to the limits that have been established.

Dalam penerapan manajemen risiko pasar yang terpapar risiko *counterparty*, Perusahaan telah menghitung, mengukur dan memantau secara berkala minimal 1 (satu) bulan sekali sesuai dengan SEOJK Nomor 23/SEOJK.03/2022 tentang Perhitungan Aset Tertimbang Menurut Risiko (ATMR) untuk Risiko Pasar bagi Bank Umum terkait BMPK Derivatif *Non* Kredit yang diperhitungkan pada Aktiva Tertimbang Menurut Risiko (ATMR) untuk Risiko Kredit dan *Credit Value Adjustment* (CVA) yang merupakan bagian dari laporan Aktiva Tertimbang Menurut Risiko (ATMR) untuk risiko pasar sesuai ketentuan.

In the implementation of market risk management exposed to counterparty risk, the Company has calculated, measured and monitored periodically at least once every 1 (one) month in accordance with SEOJK Number 23/SEOJK.03/2022 concerning Calculation of Risk-Weighted Assets (ATMR) for Market Risk for Commercial Banks related to BMPK Non-Credit Derivatives calculated in Risk-Weighted Assets (ATMR) for Credit Risk and Credit Value Adjustment (CVA) which is part of the Assets report Risk Weighted (RWA) for regulated market risk.

**Risiko Likuditas**

Risiko likuiditas adalah risiko yang disebabkan oleh ketidakmampuan Perusahaan untuk memenuhi kewajiban yang jatuh tempo menggunakan sumber pendanaan arus kas dan/atau dari aset likuid berkualitas tinggi yang dapat diagunkan, tanpa mengganggu aktivitas dan kondisi keuangan Perusahaan. Risiko likuiditas merupakan risiko yang terpenting pada perusahaan umum dan perlu dikelola secara berkesinambungan.

**Liquidity Risk**

Liquidity risk is the risk caused by the Company's inability to fulfill overdue obligations using cash flow funding sources and/or from high-quality liquid assets that can be collateralized, without disrupting the Company's activities and financial condition. Liquidity risk is the most important risk for public companies and needs to be managed on an ongoing basis.

Dalam menjaga serta memantau kondisi likuiditas maka Perusahaan membentuk *Asset and Liability Management* (ALMA) yang beranggotan setingkat pejabat eksekutif dan *Asset and Liability Committee* (ALCO) yang beranggotakan manajemen senior tertinggi. ALMA memiliki tugas dan tanggung jawab antara lain melakukan simulasi kecukupan likuiditas Perusahaan, melakukan uji coba *Contigency Funding Plan* (CFP) dan Pinjaman Likuiditas Jangka Pendek (PLJP) pada Bank Indonesia dan memberikan rekomendasi kepada ALCO terkait langkah antisipasi yang perlu dilakukan untuk memastikan kecukupan likuiditas termasuk rekomendasi terkait suku bunga. Sedangkan ALCO memiliki tugas dan tanggung jawab yaitu mengarahkan dan menentukan rencana, kebijakan, strategi, struktur neraca, likuiditas, profitabilitas, dan risiko yang terkait dengan risiko valuta asing dan tingkat suku bunga melalui proses pengawasan, identifikasi dan pengukuran paparan risiko dengan memperhatikan prinsip kehati-hatian.

In maintaining and monitoring liquidity conditions, the Company has established Asset and Liability Management (ALMA) which consists of members at the level of executive officers and the Asset and Liability Committee (ALCO) which consists of the highest senior management. ALMA has duties and responsibilities, including conducting simulations of the Company's liquidity adequacy, conducting trials of Contigency Funding Plans (CFP) and Short-Term Liquidity Loans (PLJP) at Bank Indonesia and providing recommendations to ALCO regarding anticipatory steps that need to be taken to ensure liquidity adequacy including recommendations related to interest rates. Meanwhile, ALCO has the duty and responsibility to direct and determine plans, policies, strategies, balance sheet structure, liquidity, profitability, and risks related to foreign exchange and interest rate risks through supervision, identification, and measurement of risk exposure while considering the principle of prudence.

Pemantauan dan pengukuran terhadap risiko likuiditas dilakukan secara harian, mingguan, bulanan, dan triwulan, sebagai bagian dari sistem informasi manajemen dan hasil pemantauan tersebut dilaporkan kepada Manajemen. Pemantauan dilakukan terhadap komposisi posisi keuangan Perusahaan antara lain kecukupan Giro Wajib minimum (GWM) Rupiah dan Valas, Giro RIM, Penyangga Likuiditas Makroprudensial (PLM), Rasio Intermediasi Makroprudensial (RIM), *Liquidity Coverage Ratio* (LCR), *Net Stable Funding Ratio* (NSFR), pergerakan Deposan Inti, monitoring terhadap aktivitas *Money Market* terkait penempatan dan peminjaman dana interbank, Laporan *Maximum Cumulative Outflow* (MCO) berdasarkan *cashflow*, Laporan *Early Warning Indicator* (EWI), Laporan *Risk Appetite* dan *Risk Tolerance* (RART) dan *Stress Testing* likuiditas guna memastikan kecukupan likuiditas Bank untuk memenuhi penarikan dana nasabah pada kondisi krisis.

Monitoring and measurement of liquidity risk are conducted daily, weekly, monthly, and quarterly, as part of the management information system, and the results of this monitoring are reported to Management. Monitoring is carried out on the composition of the Company's financial position, including the adequacy of the Minimum Required Reserves (GWM) in Rupiah and foreign currencies, RIM deposits, Macroprudential Liquidity Buffers (PLM), Macroprudential Intermediation Ratios (RIM), Liquidity Coverage Ratios (LCR), Net Stable Funding Ratios (NSFR), movements of Core Depositors, monitoring of Money Market activities related to interbank fund placements and borrowings, Maximum Cumulative Outflow (MCO) reports based on cash flow, Early Warning Indicator (EWI) reports, Risk Appetite and Risk Tolerance (RART) reports, and liquidity stress testing to ensure the Bank's liquidity adequacy to meet customer fund withdrawals in crisis conditions.

Perusahaan telah menetapkan *Risk Appetite* dan *Risk Tolerance* untuk Risiko Likuiditas yaitu Rasio Deposan Inti terhadap Total Dana Pihak Ketiga, Rasio Intermediasi Makroprudensial (RIM), *Liquidity Coverage Ratio* (LCR) dan *Net Stable Funding Sratio* (NSFR). Hasil pemantauan disampaikan secara berkala kepada *Asset & Liabilities Committee* (ALCO) *member*, *Asset & Liabilities Management* (ALMA) *member* yang meliputi unit bisnis dan unit pendukung, Komite Manajeman Risiko (KMR), Komite Pemantau Risiko (KPR) serta kepada Direksi Perusahaan.

The company has established the Risk Appetite and Risk Tolerance for Liquidity Risk, which includes the Core Deposit Ratio to Total Third Party Funds, the Macroprudential Intermediation Ratio (RIM), the Liquidity Coverage Ratio (LCR), and the Net Stable Funding Ratio (NSFR). Monitoring results are reported periodically to the Asset & Liabilities Committee (ALCO) members, Asset & Liabilities Management (ALMA) members, which include business units and support units, the Risk Management Committee (KMR), the Risk Monitoring Committee (KPR), as well as to the Company's Board of Directors.

Dalam melakukan perhitungan LCR dan NSFR, Perusahaan telah menggunakan sistem sebagai bagian penerapan dari sistem informasi manajemen dalam rangka menghasilkan perhitungan LCR dan NSFR secara bulanan dengan tujuan agar semua perhitungan dilakukan secara otomasi guna menyampaikan informasi risiko yang akurat, efektif, sesuai dengan ketentuan yang diatur oleh regulator, dan tepat waktu serta meminimal potensi terjadinya risiko operasional.

In calculating LCR and NSFR, the Company has used a system as part of the application of the management information system in order to produce LCR and NSFR calculations on a monthly basis with the aim that all calculations are carried out automatically in order to convey risk information that is accurate, effective, in accordance with the provisions regulated by the regulator, and timely as well to minimize the potential for operational risks.

Rasio Kecukupan Likuiditas diungkapkan pada Catatan 50i.

Liquidity Adequacy Ratio are disclosed in Note 50i.

Selain itu Perusahaan telah selesai mengembangkan sistem untuk mengukur kemampuan arus kas keluar maksimum (MCO) perusahaan secara otomasi dan dihasilkan secara harian sehingga perusahaan dapat melakukan pemantauan kemampuan likuiditas perusahaan serta melakukan tindak lanjut lebih cepat jika perusahaan mengalami kebutuhan likuiditas dalam jumlah besar.

In addition, the Company has completed developing a system to measure the company's maximum cash outflow (MCO) capability by automation and generated on a daily basis so that the company can monitor the company's liquidity capabilities and follow up faster if the company experiences large amounts of liquidity needs.

Dalam melakukan Pengelolaan terhadap likuiditas Perusahaan, dilakukan studi untuk mempelajari pola pergerakan dana dan/atau perilaku nasabah dana pihak ketiga, khususnya dana nasabah inti dan nasabah yang memiliki tingkat volatilitas cukup tinggi. Dengan mempelajari perilaku nasabah, maka Perusahaan dapat menjaga kecukupan likuiditas yang diperlukan secara tepat dalam rangka memenuhi kewajiban perusahaan atas Dana Pihak Ketiga. Perusahaan selalu menjaga kecukupan Penyangga Likuiditas Makroprudensial (PLM) pada level yang aman dengan besaran kecukupan disesuaikan dengan kondisi likuiditas Perusahaan secara spesifik maupun kondisi likuiditas di pasar.

In managing the Company's liquidity, a study is conducted to research the pattern of movement of funds and/or behavior of third party fund customers, particularly core customer funds and customers with fairly high level of volatility. By studying the customer behavior, the Company can maintain adequate liquidity that is appropriately needed in order to fulfill the Company's obligations on Third Party Funds. The Company always maintains the adequacy of Macroprudential Liquidity Buffer (MLB) at a safe level with the amount of adequacy adjusted to the Company's specific liquidity conditions and liquidity conditions in the market.

Perusahaan senantiasa melakukan pemantauan terhadap posisi *core fund* dan berupaya untuk secara berkesinambungan meningkatkan persentase terhadap jumlah dana yang dimiliki. *Core fund* menjadi bagian yang sangat penting bagi Perusahaan dalam menjalankan fungsi intermediasi berupa penyediaan dana jangka panjang. Hal ini mengingat portofolio dana pihak ketiga yang dimiliki Perusahaan sebagian besar berjangka waktu sampai dengan 1 (satu) tahun. Upaya yang dilakukan untuk meningkatkan dana mengendap antara lain diciptakan program-program yang mengharuskan dana nasabah ditahan dan tidak dapat ditarik sampai jangka waktu tertentu sesuai dengan ketentuan program.

The Company continues to monitor the position of core fund and seeks to continually increase percentage of total funds. Core fund becomes a very important part of the Company in conducting intermediation of funds in the form of long-term supply. This is because the majority of the Company’s third party fund portfolio has maturity of up to 1 (one) year. Efforts are made to raise funds among others to create programs that require customer funds on hold and can not be withdrawn until a specified period in accordance with the provisions of the program.

Dalam rangka mengikuti perkembangan bisnis Perusahaan yang semakin dinamis serta adanya perubahan strategi yang dilakukan Perusahaan maka telah dilakukan *back testing* dan kaji ulang terkait metodologi yang digunakan untuk perhitungan *Core Fund* yaitu menggunakan data historis selama 5 tahun, melihat pergerakan *outstanding* selama 5 tahun dan menghitung dengan tingkat kepercayaan (*confidence leve*l) 95%. Perhitungan *back testing* dan kaji ulang metodologi telah disampaikan dan disetujui oleh Direksi dan Dewan Komisaris melalui Rapat dan/atau melalui sirkulasi Memorandum Internal dan/atau melalui *e-mail.*

In order to follow the development of the Company's increasingly dynamic business and changes in strategy carried out by the Company, back testing and review of the methodology used for Core Fund calculations have been carried out, which is using historical data for 5 years, looking at outstanding movements for 5 years and calculating with a confidence level of 95%. The calculation of back testing and review of methodology has been submitted and approved by the Board of Directors and Board of Commissioners through the Meeting and/or through the circulation of the Internal Memorandum and/or via e-mail.

Pada dasarnya, risiko likuiditas dikelola sesuai dengan kerangka kebijakan, pengawasan, dan batasan yang memastikan bahwa konsentrasi pendanaan bersifat minimal, sumber dan jangka waktu pendanaan telah terdiversifikasi.

Berikut adalah jadwal jatuh tempo liabilitas keuangan (termasuk simpanan dan simpanan dari bank lain berdasarkan prinsip syariah) dan dana syirkah temporer berdasarkan pembayaran kontraktual pada tanggal 31 Desember 2024 dan 2023:

Basically, liquidity risk is managed in accordance with the policy framework, supervision, and restrictions that ensure the concentration of funding is minimal, the resources and funding period are diversified.

The table below shown the maturities of financial liabilities (including deposits and deposits from other banks based on sharia principles) and temporary syirkah funds based on contractual payments as of December 31, 2024 and 2023:

| | 2024 | | | | | | |
|---|---|---|---|---|---|---|---|
| | Sampai Dengan 1 Bulan/ *1 Month or Less* | > 1 Bulan s.d. 3 Bulan/ *More than 1 Month Until 3 Months* | > 3 Bulan s.d. 6 Bulan/ *More than 3 Months Until 6 Months* | > 6 Bulan s.d. 12 Bulan/ *More than 6 Months Until 12 Months* | > 12 Bulan/ *More than 12 Months* | Nilai Tercatat/ *Carriying Value* | |
| Liabilitas | | | | | | | Liabilities |
| Liabilitas segera | 178.778 | - | - | - | - | 178.778 | Liabilities immediately payable |
| Simpanan | 35.381.807 | 1.344.487 | 400.419 | 554.206 | 216.496 | 37.897.415 | Deposits |
| Simpanan dari bank lain | 60.760 | 6.000 | - | - | - | 66.760 | Deposits from other banks |
| Efek yang dijual dengan janji beli kembali | 879.455 | - | - | - | - | 879.455 | Securities sold under agreements to repurchased |
| Liabilitas akseptasi | 29.148 | 9.012 | - | - | - | 38.160 | Acceptance payable |
| Obligasi subordinasi | - | - | - | - | 497.505 | 497.505 | Subordinated bonds |
| Beban yang masih harus dibayar | 44.216 | - | - | - | - | 44.216 | Accrued expenses |
| Liabilitas lain-lain | 178.489 | - | - | - | - | 178.489 | Other liabilities |
| Jumlah Liabilitas | 36.752.653 | 1.359.499 | 400.419 | 554.206 | 714.001 | 39.780.778 | Total Liabilities |
| Dana Syirkah Temporer | | | | | | | Temporary Syirkah Funds |
| Simpanan | 4.247.984 | 1.130.932 | 1.391.386 | 152.247 | - | 6.922.549 | Deposits |
| Simpanan dari bank lain | 2.972 | - | - | - | - | 2.972 | Deposits from other banks |
| Jumlah Dana Syirkah Temporer | 4.250.956 | 1.130.932 | 1.391.386 | 152.247 | - | 6.925.521 | Total Temporary Syirkah Funds |

| | 2023 | | | | | | |
|---|---|---|---|---|---|---|---|
| | Sampai Dengan 1 Bulan/ *1 Month or Less* | > 1 Bulan s.d. 3 Bulan/ *More than 1 Month Until 3 Months* | > 3 Bulan s.d. 6 Bulan/ *More than 3 Months Until 6 Months* | > 6 Bulan s.d. 12 Bulan/ *More than 6 Months Until 12 Months* | > 12 Bulan/ *More than 12 Months* | Nilai Tercatat/ *Carriying Value* | |
| Liabilitas | | | | | | | Liabilities |
| Liabilitas segera | 165.101 | - | - | - | - | 165.101 | Liabilities immediately payable |
| Simpanan | 32.949.051 | 1.337.062 | 513.221 | 334.938 | 8.313 | 35.142.585 | Deposits |
| Simpanan dari bank lain | 325.445 | 2.000 | - | - | - | 327.445 | Deposits from other banks |
| Efek yang dijual dengan janji beli kembali | 1.051.717 | - | - | - | - | 1.051.717 | Securities sold under agreements to repurchased |
| Liabilitas akseptasi | 51.272 | 28.608 | - | - | - | 79.880 | Acceptance payable |
| Obligasi subordinasi | - | - | - | - | 496.512 | 496.512 | Subordinated bonds |
| Beban yang masih harus dibayar | 43.816 | - | - | - | - | 43.816 | Accrued expenses |
| Liabilitas lain-lain | 160.660 | - | - | - | - | 160.660 | Other liabilities |
| Jumlah Liabilitas | 34.747.062 | 1.367.670 | 513.221 | 334.938 | 504.825 | 37.467.716 | Total Liabilities |
| Dana Syirkah Temporer | | | | | | | Temporary Syirkah Funds |
| Simpanan | 4.392.299 | 904.012 | 1.572.052 | 135.188 | - | 7.003.551 | Deposits |
| Simpanan dari bank lain | 15.769 | - | - | - | - | 15.769 | Deposits from other banks |
| Jumlah Dana Syirkah Temporer | 4.408.068 | 904.012 | 1.572.052 | 135.188 | - | 7.019.320 | Total Temporary Syirkah Funds |

Sebagian besar liabilitas yang dimiliki oleh Perusahaan akan jatuh tempo dalam waktu kurang dari 1 bulan, namun berdasarkan data historis Perusahaan, sebagian besar dari liabilitas tersebut pada saat jatuh tempo akan diperpanjang (*roll over*). Upaya yang dilakukan Perusahaan agar nasabah tetap mempertahankan dananya pada Perusahaan yaitu dengan meningkatkan kualitas pelayanan serta memberikan penawaran suku bunga yang wajar dan kompetitif. Dengan upaya tersebut, Perusahaan juga mengharapkan dapat menarik nasabah baru untuk menempatkan dananya pada Perusahaan. Perusahaan juga melakukan upaya lain untuk memitigasi adanya penarikan dana secara besar-besaran oleh nasabah dimana Perusahaan juga memantau 50 deposan inti, dengan cara mengevaluasi profil dan perilaku dari deposan-deposan tersebut sehingga Perusahaan dapat melakukan antisipasi terhadap penarikan dana besar yang akan dilakukan deposan.

Most of the liabilities held by the Company will mature in less than 1 month, however, based on the history data of the Company, most of these liabilities will be rolled over at maturity. Efforts are made by the Company to ensure that customers retain their funds in the Company, which is by improving service quality and offering fair and competitive interest rates. With these efforts, the Company also hopes to attract new customers to place their funds in the Company. The Company also made other efforts to mitigate large-scale withdrawals of funds by customers where the Company also monitors 50 core depositors, by evaluating the profile and behavior of these depositors so that the Company can anticipate large withdrawals of funds that will be made by depositors.

Untuk mengetahui dampak perubahan faktor pasar maupun faktor internal pada kondisi ekstrim terhadap likuiditas, Perusahaan melakukan *stress testing* Risiko Likuiditas secara berkala. Asumsi dan/atau skenario serta hasil *stress testing* disampaikan dan disetujui oleh Komite Manajemen Risiko dan/atau Direksi melalui rapat komite manajemen risiko atau melalui sirkulasi Memorandum Internal atau melalui *email*. Dalam melakukan *stress testing,* Perusahaan telah melakukan kajian besaran persentase dana keluar sesuai dengan kebiasaan atau *behavior* nasabah dalam kondisi stress dengan menggunakan data historis dari 500 hari terakhir dengan tingkat kepercayaan 99% untuk Skenario *Bank Specific* (*Bank Specific Crisis* - BSC) dan 4 kali *standard* deviasi untuk skenario krisis pada pasar (*General Market Crisis* - GMC). Sampai dengan saat ini, Perusahaan tidak pernah mengalami kesulitan likuiditas maupun kondisi yang berpotensi menimbulkan risiko bagi Perusahaan.

To determine the impact of changes in market factors and internal factors in extreme conditions on liquidity, the Company conducts periodic stress testing of Liquidity Risk. Assumptions and/or scenarios and results of stress testing are submitted and approved by the Risk Management Committee and/or Board of Directors through risk management committee meetings or through the circulation of Internal Memorandums or via email. In conducting stress testing, the company has conducted a study of the percentage of outgoing funds according to customer habits or behavior in stressful conditions using historical data from the last 500 days with a confidence level of 99% for Bank Specific Crisis (BSC) Scenarios and 4 times standard deviations for crisis scenarios in the market (General Market Crisis - GMC). Until now, the Company has never experienced liquidity difficulties or conditions that potentially pose risks to the Company.

Dalam rangka persiapan menghadapi potensi risiko, Perusahaan telah memiliki Rencana Pendanaan Darurat (*Contingency Funding Plan*) dan Rencana Pinjaman Likuiditas Jangka Pendek (PLJP) Bank Indonesia (BI) untuk menghindari terjadinya kesulitan likuiditas. Perusahaan memiliki sejumlah upaya antisipasi seperti ketersediaan Giro Wajib Minimum (GWM), Cadangan Sekunder, penetrasi yang baik terhadap pasar antar perusahaan, serta dukungan dari pemegang saham pengendali. Perusahaan dalam rangka menjalankan Rencana Pendanaan Darurat (*Contingency Funding Plan* (CFP) dan Pinjaman Likuiditas

In preparation for potential risks, the Company has established a Bank Indonesia (BI) Contingency Funding Plan and Short Term Liquidity Loan Plan (PLJP) to avoid liquidity difficulties. The Company has a number of anticipatory efforts such as the availability of reserve requirements, secondary reserves, good penetration of the intercompany market, and support from controlling shareholders. In order to implement Bank Indonesia's (BI) Contingency Funding Plan (CFP) and Short Term Liquidity Loan (PLJP), the Company formed a special team, namely the Contigency Crisis Team (CCT) consisting of the Company's highest senior

Jangka Pendek (PLJP) Bank Indonesia (BI) maka membentuk tim khusus yaitu *Contigency Crisis Team* (CCT) yang beranggotakan manajemen senior tertinggi Perusahaan baik dari divisi *Risk*, divisi *Operation*, divisi *Finance* dan bisnis unit yang dipimpin oleh ketua ALMA yaitu *Treasury* & *Financial Institution Group Head*. CCT memiliki tugas dan tanggung jawab utama yaitu melakukan proses pemantauan likuditas pada saat terjadi krisis sampai dengan pemulihan kondisi likuiditas kembali ke kondisi normal.

management from the Risk division, Operations division, Finance division and business unit led by the chairman of ALMA, namely Treasury & Financial Institution Group Head. CCT has the main task and responsibility, that is carrying out the process of monitoring liquidity in the event of a crisis until the restoration of liquidity conditions comes back to normal conditions.

Uji coba terkait CFP dan PLJP kepada BI dilakukan secara berkala yang mengikutksertakan Direksi dan manajemen senior pada perusahaan serta hasil uji coba ini disampaikan kepada ALCO, Komite Manajemen Risiko (KMR) dan Komite Pemantau Risiko (KPR) yang merupakan salah satu tugas dan tanggung jawab dari Dewan Komisaris dan Direksi. *Parameter* CFP yang telah di uji coba dan disampaikan serta disetujui digunakan sebagai alat ukur untuk dilakukan pemantauan secara mingguan melalui laporan *Early Warning Indicators* (EWI) yang dapat dijadikan salah satu peringatan dini likuiditas Perusahaan.

The trials related to CFP and PLJP to Bank Indonesia is conducted periodically involving the Board of Directors and senior management of the company, and the results of this trial are communicated to ALCO, the Risk Management Committee (KMR), and the Risk Monitoring Committee (KPR), which are part of the duties and responsibilities of the Board of Commissioners and Directors. The CFP parameters that have been tested, communicated, and approved are used as measurement tools for weekly monitoring through Early Warning Indicators (EWI) reports, which can serve as an early warning for the Company's liquidity.

**Risiko Operasional**

Risiko operasional adalah risiko yang antara lain disebabkan oleh ketidakcukupan dan/atau tidak berfungsinya proses internal, kesalahan manusia, kegagalan sistem, atau adanya problem eksternal yang mempengaruhi operasional Perusahaan.

**Operational Risk**

Operational risk is the risk among others, caused by insufficient and/or malfunctioning of internal processes, human error, system failure, or external problems affecting the Company’s operations.

Risiko operasional dapat menimbulkan kerugian keuangan maupun non-keuangan secara langsung maupun tidak langsung dan kerugian potensial atas hilangnya kesempatan memperoleh keuntungan. Risiko operasional juga dapat melekat pada setiap aktivitas fungsional Perusahaan, seperti kegiatan perkreditan (penyediaan dana), *treasury* dan investasi, operasional dan jasa, pembiayaan perdagangan, pendanaan dan instrumen utang, Teknologi Sistem Informasi dan Sistem Informasi Manajemen, serta pengelolaan sumber daya manusia.

Operational risks may cause financial loss directly or indirectly, and the potential losses for the loss of opportunity to earn a profit. Operational risk can also be attached to each functional activity of the Company, such as provisions of funds and investment, operations and services, trade financing, funding and debt instruments, Information Systems Technology and Management Information Systems, and HR management.

Kebijakan dan prosedur yang terkait dengan pengelolaan risiko operasional di Perusahaan senantiasa disusun, dikaji ulang dan disempurnakan untuk memastikan kecukupan mekanisme kontrol pada semua kebijakan dan prosedur telah memadai. Perusahaan juga secara aktif melakukan sosialisasi untuk membangun budaya sadar risiko dan meningkatkan kualitas kontrol dalam rangka mitigasi risiko operasional.

Policies and procedures related to the management of operational risk in the Company is always prepared, reviewed and refined to ensure sufficient control mechanisms that all policies and procedures are adequate. The Company is also actively socializing to build risk awareness and improve quality control in order to mitigate operational risk.

Pengembangan sistem dan penerapan perangkat risiko operasional untuk mengukur eksposur risiko pada kondisi sekarang, lampau (historis) dan untuk mengukur besarnya potensi kejadian risiko di masa depan. Dengan pendekatan ini, diharapkan Perusahaan dapat lebih komprehensif dalam mengelola risiko operasional.

System development and implementation of operational risk tools measure the risk exposure in current, past (historical) conditions and measure the magnitude of potential risk events in the future. With this approach, the Company is expected to be more comprehensive in managing operational risk.

Proses identifikasi, pengukuran, pemantauan dan pengendalian risiko operasional ditingkatkan dengan melibatkan lini pertama/unit kerja yang dilakukan melalui *training* karyawan mulai dari level *staff* sampai dengan pejabat, reviu terhadap kebijakan/prosedur operasional, *risk assessment* atas penerbitan produk dan/atau aktivitas baru Perusahaan, serta opini dari Direktur Kepatuhan dan Direktur Manajemen Risiko terkait dengan penerbitan produk dan/atau aktivitas baru tersebut.

The process of identification, measurement, monitoring and control of operational risk is improved by involving the first line/work unit which is carried out through employee training from staff level to officials, reviews of operational policies/procedures, risk assessment on the issuance of new products and/or activities of the Company, as well as opinions from the Director of Compliance and the Director of Risk Management regarding the issuance of the new product and/or activity.

Perangkat risiko operasional yang digunakan oleh Perusahaan antara lain:

The operational risk tools used by the Company include:

- ***Loss Event Database (LED)***
  Perusahaan membangun dan mengembangkan perangkat risiko operasional lainnya seperti *Loss Event Database* (LED) yang tujuannya untuk menyusun *database* atas kejadian-kejadian yang terjadi sebagai akibat risiko operasional serta mengukur besarnya kerugian yang diakibatkan oleh kejadian operasional tersebut. Pengawasan dilakukan secara terus menerus dan pelaporan LED dilakukan secara berkala.

  ***Loss Event Database (LED)***
  The Company builds and develops other operational risk tools such as Loss Event Database (LED) which aims to compile a database of events that occur as a result of operational risk and measure the amount of losses caused by these operational events. Monitoring is carried out continuously and LED reporting is carried out regularly.

- ***Risk Control Self Assessment* (RCSA)**
  *Risk Control Self Assessment* (RCSA) merupakan suatu alat dan mekanisme yang bertujuan untuk melakukan identifikasi risiko dan pengukuran atas efektivitas pelaksanaan kontrol yang akan menghasilkan penilaian atas tingkat risiko. RCSA dilakukan secara berkala dan berkelanjutan untuk meningkatkan efektivitas dan efisiensi dalam pelaksanaannya.

  ***Risk Control Self Assessment* (RCSA)**
  Risk Control Self Assessment (RCSA) is a tool and mechanism that aims to identify risks and measure the effectiveness of the implementation of controls that will result in an assessment of the level of risk. RCSA is carried out regularly and continuously to improve effectiveness and efficiency in its implementation.

- ***Key Risk Indicator (KRI)***
  *Key Risk Indicator* (KRI) adalah salah satu perangkat untuk mengelola risiko operasional yang digunakan untuk mengidentifikasi atau memberikan suatu indikator (*early warning signal*) dan menganalisa risiko sejak dini atas naik turunnya indikator-indikator tingkat risiko dalam rangka pengendalian setiap risiko operasional yang melekat pada setiap aktivitas bisnis dan operasional Perusahaan.

  ***Key Risk Indicator (KRI)***
  Key Risk Indicator (KRI) is one of the tools for managing operational risk which is used to identify or provide an indicator (early warning signal) and analyze risk from an early stage on the ups and downs of risk level indicators in order to control any operational risk inherent in every business and operational activity of the Company.

Untuk meningkatkan keamanan, Divisi *Cyber Resilience* telah memiliki Team *Security Operation Center* (SOC) yang bertujuan untuk meningkatkan proses pemantauan terhadap percobaan serangan yang ditujukan kepada sistem Perusahaan selama 24 jam dalam seminggu.

To improve security, the Cyber Resilience Division has a Security Operation Center (SOC) Team that aims to improve the monitoring process of attempted attacks aimed at the Company's systems 24 hours in a week.

Divisi *Operations & Product Assurance* telah mengimplementasikan *Operation Control Room*, dimana ruangan ini digunakan sebagai pusat untuk pemantauan terhadap *availability* dan *performance* jaringan kantor, serta pemantauan permasalahan pada sistem Perusahaan.

The Operations & Product Assurance Division has implemented an Operation Control Room, where this room is used as a center for monitoring the availability and performance of office networks, as well as monitoring problems in the Company's systems.

Perusahaan telah memiliki Kebijakan/Prosedur *Disaster Recovery Plan* (DRP) sistem kritikal, yang mengatur rencana pemulihan untuk gangguan yang terjadi pada sistem.

The company already has a critical system Disaster Recovery Plan (DRP) Policy/Procedure, which regulates recovery plans for disruptions that occur in the system.

Dalam rangka *fraud awareness*, Perusahaan melakukan sosialisasi *fraud awareness* secara berkesinambungan, *refreshment* terhadap Deklarasi Anti Fraud dan Pakta Integritas untuk meningkatkan kesadaran karyawan tentang pentingnya tindakan pencegahan dan pengendalian terhadap *fraud*.

In the context of fraud awareness, the Company conducts continuous fraud awareness socialization, refreshment of the Anti-Fraud Declaration and Integrity Pact to increase employee awareness of the importance of fraud prevention and control measures.

Perusahaan juga telah melakukan *self assessment* atas Laporan Hasil Penilaian terkait Keamanan Siber Bank Tahun 2023. Secara keseluruhan Hasil Penilaian terkait Keamanan Siber Bank Tahun 2023 dengan menggunakan parameter-parameter yang ditetapkan dalam SEOJK No.29/SEOJK.03/2023 dinilai peringkat 2 atau *Low to Moderate* dengan Penilaian Risiko Inheren terkait Keamanan Siber dinilai peringkat 2 atau *Low to Moderate* dan Penilaian Tingkat Maturitas Keamanan Siber dinilai peringkat 2 atau *Satisfactory.*

The Company has conducted a self-assessment of the Bank's Cybersecurity Assessment Results Report for 2023. Overall, the Assessment Results related to Bank Cybersecurity in 2023 using the parameters set out in SEOJK No.29/ SEOJK.03/2023 are rated 2nd or Low to Moderate with Inherent Risk Assessment related to Cybersecurity rated 2nd or Low to Moderate and the Cybersecurity Maturity Level Assessment is rated 2nd or Satisfactory.

**Risiko Hukum**

**Legal Risk**

Risiko hukum adalah risiko yang timbul dari kelemahan aspek hukum, antara lain akibat dari tindakan hukum, tidak adanya peraturan yang mendukung atau kelemahan dari ketentuan-ketentuan yang mengikat secara hukum, seperti kegagalan untuk mematuhi persyaratan hukum suatu perjanjian dan celah-celah dalam pengikatan jaminan.

Legal risk is the risk arising from the weakness of the legal aspects, including among others the result of legal action, the absence of supporting regulations or vulnerability in the legally binding regulations, such as failure to comply with the legal requirements of an agreement or loopholes in the attach collateral.

Pelaksanaan identifikasi, pengukuran, dan pemantauan terhadap potensi risiko hukum dilaksanakan terhadap seluruh aktivitas Perusahaan, terutama kegiatan operasional Perusahaan dengan melibatkan pihak ketiga yang memiliki potensi benturan kepentingan atau gugatan hukum.

Implementation of the identification, measurement, and monitoring of potential legal risks are undertaken by all the Company's activities, especially the Company's operational activities involving third parties who have a conflict of interest or potential litigation.

Dalam rangka mitigasi potensi risiko hukum, Perusahaan melakukan hal-hal berikut: melakukan kajian terhadap kesesuaian perjanjian kerjasama dengan pihak eksternal, menyempurnakan kebijakan dan prosedur sebagai bagian dari mitigasi risiko hukum.

In order to mitigate potential legal risks, the Company does the following: conducts studies on the suitability of cooperation agreements with external parties, refines policies and procedures as part of mitigating legal risks.

Dalam rangka pemantauan atas penyelesaian terhadap gugatan hukum, unit kerja Legal bagian Litigasi melakukan pendampingan dan hadir dalam setiap persidangan/panggilan kepolisian risiko hukum.

In the context of monitoring the settlement of lawsuits, the Legal work unit in the Litigation section provides assistance and is present at every legal risk court/police summons.

**Risiko Stratejik**

**Strategic Risk**

Risiko stratejik adalah risiko yang antara lain disebabkan oleh adanya penetapan dan pelaksanaan strategi Perusahaan yang tidak tepat, pengambilan keputusan bisnis yang tidak tepat atau kurang responsifnya Perusahaan terhadap perubahan eksternal.

Strategic risk is a risk that among others arises from inadequate decree and implementation of the Company's strategies, incorrect business decision, or irresponsiveness to external changes.

Perusahaan telah menyusun strategi dan rencana bisnis yang sebelumnya telah didiskusikan dengan Dewan Komisaris, Direksi serta seluruh manajemen Perusahaan. Perusahaan juga melakukan kajian dan evaluasi stratejik bisnis serta realisasi yang telah dicapai oleh Perusahaan sesuai dengan yang terangkum dalam Rencana Bisnis Perusahaan.

The Company has formulated the business strategies and plans based on discussions from the Board of Commissioners, Directors and all of Company's management. The Company also reviews and evaluate business strategy and its realization achieved by the Company based on the Company's Business Plan.

Secara umum, untuk posisi 31 Desember 2024, Perusahaan telah mencapai realisasi yang baik pada pos-pos keuangan secara konsolidasi dengan perusahaan anak seperti Surat Berharga, (*Net Interest Income*) NIM, (*Non Performing Loan*) NPL *Gross*, NPL *Nett*, (*Return on Equity*) ROE, (*Return on Asset*) ROA, (Biaya Operasi Pendapatan Operasi) BOPO, (*Capital Adequacy Ratio*) CAR, dan Laba.

In general, as of December 31, 2024, the Company has achieved good realizations in consolidated financial items with subsidiaries such as Securities, Net Interest Income (NIM), Gross Non-Performing Loans (NPL), Net NPL, Return on Equity (ROE), Return on Assets (ROA), Operating Expense to Operating Income (BOPO), Capital Adequacy Ratio (CAR), and Profit.

Perusahaan secara bertahap juga melakukan penyempurnaan pada seluruh proses aktivitas bisnis Perusahaan untuk lebih mengakselerasi pencapaian kinerja sesuai dengan target yang ditentukan.

Gradually, the Company is also refining all business activity processes to further accelerate the achievement of performance in accordance with the established targets.

Perusahaan juga semakin memfokuskan pada pengembangan *Digital Banking* yang bekerjasama dengan pihak ketiga dalam rangka pemberian kredit melalui platform *mobile banking* (*Digital Loan*) secara bertahap.

The Company is also increasingly focusing on the development of Digital Banking in collaboration with third parties for the provision of credit through mobile banking platforms (Digital Loan) in a gradual manner.

Selama Semester II - Desember 2024, Perusahaan berusaha mengembangkan bisnis dengan melakukan diversifikasi produk dengan mengembangkan beberapa produk/aktivitas baru seperti:

During the Second Semester - December 2024, the Company seeks to expand its business by diversifying its products through development of several new products/activities such as:

- Reksa Dana Terproteksi *STAR Protected* 24, yaitu reksa dana yang akan memproteksi 100% pokok investasi investor pada saat jatuh tempo, dengan fitur khusus adanya proteksi (namun bukan jaminan) terhadap nilai pokok investasi awal jika tidak terjadi wanprestasi (gagal bayar) dari emiten penerbit Obligasi/surat hutang yang digunakan (dalam mata uang Rupiah). Produk/ aktivitas ini telah *live* pada Juli 2024;

- Term ROP (DMTM), yaitu produk asuransi jiwa berjangka yang memberikan manfaat perlindungan jiwa selama 12 tahun dan manfaat pengembalian premi pada tahun polis ke delapan. Produk/aktivitas ini telah *live* pada Agustus 2024;

- Pengembangan bisnis *acquiring* untuk transaksi pembayaran menggunakan *contactless* dan lainnya kerjasama dengan lembaga switching (GPN) dan principal internasional, termasuk Kartu Kredit Indonesia (KKI), yaitu Pengembangan *issuing* & *acquirring* untuk menerima pembayaran, bekerjasama dengan lembaga *switching* (GPN), *international principal* ataupun pihak ketiga lainnya, seperti fitur *contactless* pada EDC, *cardless withdrawal*, dll. Produk/aktivitas ini telah *live* pada Agustus 2024;

- Inquiry SIL Syariah dalam *Mobile Banking*, yaitu menampilkan informasi Portfolio Asuransi SIL Syariah yang dimiliki oleh nasabah dengan status masih aktif. Produk/aktivitas ini telah *live* pada 29 Agustus 2024;
- Pembiayaan Pemilikan Rumah, yaitu fasilitas pembiayaan kepemilikan rumah/apartemen yang dijalankan sesuai dengan prinsip Syariah. Produk/aktivitas ini telah *live* pada 5 September 2024;
- Kerjasama tarik dan setor dengan pihak ketiga, sehingga nasabah Bank Sinarmas dapat melakukan transaksi tarik dan setor tunai melalui pihak ketiga. Produk/ aktivitas ini telah *live* pada 27 Desember 2024;
- Pembiayaan *Joint Financing* (Syariah), yaitu pengembangan skema kerjasama *linkage* pembiayaan melalui perusahaan pembiayaan.

- STAR Protected 24 is a protected mutual fund that will safeguard 100% of the investor's principal investment at maturity, with a special feature of protection (but not a guarantee) against the initial principal investment value in the event of no default (failure to pay) by the issuer of the bonds/debt securities used (in Rupiah currency). This product/activity has been live since July 2024;

- The term ROP (DMTM) refers to a term life insurance product that provides life protection benefits for 12 years and a premium refund benefit in the 8th policy year. This product/activity has been live since August 2024.;

- The development of acquiring business for payment transactions using contactless and other collaborations with switching institutions (GPN) and international principals, including Indonesian Credit Card (KKI), namely the development of issuing & acquiring to receive payments, in collaboration with switching institutions (GPN), international principals, or other third parties, such as contactless features on EDC, cardless withdrawal, etc. This product/activity has gone live in August 2024;

- The inquiry regarding SIL Syariah in Mobile Banking is to display the information of the SIL Syariah Insurance Portfolio owned by customers with an active status. This product/activity has been live since August 29, 2024;
- Home Ownership Financing, which is a financing facility for home/apartment ownership that is conducted in accordance with Sharia principles. This product/activity has been live since September 5, 2024;
- Collaboration for withdrawals and deposits with third parties, allowing Bank Sinarmas customers to conduct cash withdrawal and deposit transactions through third parties. This product/activity has been live since December 27, 2024;
- Joint Financing (Sharia) financing, which is the development of a financing linkage cooperation scheme through financing companies.

Perusahaan mengambil sejumlah strategi dalam rangka mempertahankan kinerja Perusahaan seperti aktivitas operasional yang dilakukan secara *hybrid* (separuh dilakukan di rumah *(Work From Home)* dan separuh dilakukan di kantor *(Work From Office)*. Di samping itu, Perusahaan juga semakin gencar melakukan sosialisasi penggunaan transaksi *digital* melalui SimobiPlus. Perusahaan juga mengembangkan kerjasama dengan *platform digital* dalam penyaluran kredit (*digital loan*) dan *digital banking* secara keseluruhan. Perusahaan mengembangkan bisnis dengan menyalurkan kredit yang mengutamakan prinsip kehati-hatian dengan pemberian kredit secara lebih selektif, adanya pelaksanaan restrukturisasi serta menjaga likuiditas dan permodalan Perusahaan pada *level* yang memadai sehingga aktivitas operasional dan bisnis Perusahaan dapat berjalan dengan lancar.

The company has implemented several strategies to maintain its performance, such as operational activities conducted in a hybrid manner (partly done at home (Work From Home) and partly at the office (Work From Office). In addition, the company is increasingly active in promoting the use of digital transactions through SimobiPlus. The company is also developing partnerships with digital platforms for the distribution of credit (digital loans) and digital banking as a whole. The company is expanding its business by providing credit that prioritizes the principle of prudence through more selective lending, the implementation of restructuring, and maintaining the company's liquidity and capital at adequate levels so that the company's operational and business activities can run smoothly.

Pada Semester II - Desember 2024, Perusahaan telah menyusun Laporan Rencana Aksi Pemulihan Bank Sinarmas Tahun 2024 (*Recovery Plan)* mengacu kepada ketentuan OJK yaitu POJK No. 5 Tahun 2024 tentang Penetapan Status Pengawasan dan Penanganan Permasalahan Bank Umum yang telah disampaikan dan disetujui oleh OJK. Laporan Recovery Plan juga disampaikan kepada internal Bank dan eksternal (publikasi).

In Second Semester - December 2024, the Company has prepared the Recovery Plan Report for Bank Sinarmas Year 2024, referring to the provisions of OJK, namely POJK No. 5 of 2024 concerning the Determination of Supervision Status and Handling of Issues of Commercial Banks, which has been submitted and approved by OJK. The Recovery Plan Report is also submitted to the internal Bank and externally (publication).

**Risiko Kepatuhan**

Risiko kepatuhan merupakan risiko yang disebabkan Perusahaan tidak mematuhi atau tidak melaksanakan peraturan perundang-undangan dan ketentuan lain yang berlaku, seperti Posisi Devisa Neto (PDN), Giro Wajib Minimum (GWM), *Non-Performing Loan* (NPL) Netto, Ketentuan Kewajiban Penyediaan Modal Minimum (KPMM), Batas Maksimum Pemberian Kredit (BMPK).

**Compliance Risk**

Compliance risk is the risk caused by the Company is not complying or not implementing the prevailing laws and regulations, such as Net Open Position (PDN), Minimum Statutory Reserves (GWM), Non-Performing Loan (NPL) Netto, Provisions for Minimum Capital Adequacy Rasio (CAR), Maximum Credit Lending Limit (LLL).

Dalam rangka menerapkan manajemen risiko kepatuhan yang efektif, Perusahaan telah melakukan identifikasi dan pengelolaan terhadap faktor-faktor yang dapat menyebabkan meningkatnya eksposur risiko kepatuhan, yaitu:

In order to implement an effective compliance risk management, the Company identifies and manages the factors that can cause the increment in compliance risk exposure, as follows:

- Meningkatkan kesadaran atas budaya patuh melalui program kampanye kepatuhan (*Compliance Campaign*) yang dilakukan ke seluruh jajaran organisasi Perusahaan termasuk jaringan cabang melalui pelatihan kelas dan *E-Learning*, media komunikasi internal, sosialisasi peraturan baru dari *regulator* maupun Peraturan perundang-undangan lainnya. Evaluasi terhadap program pelatihan, sosialisasi dan kampanye kepatuhan dilakukan secara berkala untuk memastikan efektivitas penyampaian, pemahaman serta pemenuhan kepatuhan pada seluruh jajaran organisasi Perusahaan.

- Increase awareness of the culture of compliance through a compliance campaign program (Compliance Campaign) carried out at all levels of the Company's organization including branch networks through classroom training and E-Learning, internal communication media, dissemination of new regulations from regulators and other laws and regulations. Evaluation of training programs, socialization and compliance campaigns is carried out regularly to ensure the effectiveness of the delivery, understanding and compliance of all levels on the Company's organization.

- Menyusun dan menerbitkan *Manual Level* sebagai panduan hierarki ketentuan internal serta panduan unit-unit kerja Perusahaan dalam menyusun, menerbitkan serta mengkaji ketentuan internal.

- Dilakukan proses *review* terhadap seluruh ketentuan internal Perusahaan untuk memastikan kesesuaian dengan ketentuan regulator yang terkini, memastikan tidak adanya ketentuan yang tumpang tindih atau saling bertentangan, meningkatkan kontrol risiko serta simplifikasi proses dan jumlah aturan.

- Melakukan pemantauan, memperdalam analisa dampak serta menyusun tindak lanjut yang efektif atas peraturan baru yang diterbitkan OJK, Bank Indonesia dan regulator lainnya. Sosialisasi dan komunikasi atas peraturan perundang-undangan baru, analisa dampak serta tindak lanjut dilakukan baik melalui pertemuan langsung dengan unit-unit terkait maupun melalui media komunikasi internal yang disampaikan ke jajaran direksi, komisaris, pejabat eksekutif, karyawan pimpinan maupun seluruh karyawan Perusahaan.

- Prepare and publish Manual Level as a hierarchy guide for internal regulations as well as guidelines for the Company work units in preparing, publishing and reviewing internal regulations.

- Review process is carried out on all internal regulations of the Company to ensure compliance with the latest regulatory provisions, ensure that there are no overlapping or conflicting provisions, improve risk control and simplify the process and number of regulations.

- Monitoring, deepening impact analysis and formulating effective follow-up on new regulations issued by OJK, Bank Indonesia and other regulators. Dissemination and communication of new laws and regulations, impact analysis and follow-up are carried out both through direct meetings with related units and through internal communication media that are conveyed to the board of directors, commissioners, executive officers, management employees and all of the Company's employees.

**Risiko Reputasi**

Risiko reputasi adalah risiko yang antara lain disebabkan oleh adanya publikasi negatif yang terkait dengan kegiatan usaha Perusahaan atau persepsi negatif terhadap Perusahaan.

Salah satu upaya yang dilakukan Perusahaan untuk meningkatkan pengelolaan risiko reputasi antara lain melalui *Contact Center* untuk memberikan layanan informasi perbankan serta menerima keluhan/pengaduan nasabah, *Corporate Secretary* yang memberikan informasi yang perlu disampaikan kepada publik/*stakeholders* terkait aktivitas Perusahaan, serta petugas di kantor-kantor cabang yang setiap saat dapat memberikan informasi kepada nasabah.

Selain itu pengendalian risiko reputasi juga dilakukan antara lain dengan melalui pemantauan yang dilakukan oleh Unit Kerja *Corporate Secretary* terhadap berita yang berkaitan dengan Perusahaan di media massa.

**Reputation Risk**

Reputation risk is a risk among others that from negative publication of the Company's activity or negative perception on the Company.

One of the Company's efforts to improve reputation risk management includes among others through the Contact Center for providing banking information services as well as receiving complaints/customer's complaints, Corporate Secretary for providing information that needs to be communicated to public/stakeholders related to the Company's activity, as well as officers in the office branches that at any time, provide information to customers.

In addition, the reputation risk control is also carried out, among others, through monitoring conducted by the Corporate Secretary Working Unit on news related to the Company in mass media.

Transparansi produk yang ditawarkan kepada nasabah sesuai dengan Peraturan Bank Indonesia mengenai Transparansi produk melalui website Perusahaan, serta upaya peningkatkan standar layanan nasabah dengan melakukan *service excellence training* kepada para petugas, adanya unit kerja *Service Quality* (SQ) yang bertugas untuk memastikan kualitas pelayanan yang diberikan oleh petugas bank kepada nasabah serta terdapatnya *Quality Assurance* pada unit kerja *Contact Center* untuk memastikan kualitas pelayanan dari *Agent Call Center* maupun *Agent Telemarketing*.

Transparency of products offered to customers is in accordance with Bank Indonesia Regulations regarding product transparency through the Company's website, as well as efforts to improve customer service standards by conducting service excellence training to officers, providing Service Quality (SQ) work units to ensure the quality of services provided by bank officers to customers and the existence of Quality Assurance in Contact Center work units to ensure the quality of services from Call Center Agents and Telemarketing Agents.

Tidak terdapat pemberitaan negatif yang berdampak terhadap reputasi Bank pada Kuartal IV tahun 2024.

There is no negative reporting that impacts the reputation of the Bank in the fourth quarter of 2024.

Mengingat bahwa Perusahaan juga memiliki Entitas Anak sebagai Bank Umum Syariah (BUS), maka pengelolaan risiko tidak hanya dilakukan pada 8 (delapan) risiko, akan tetapi terdapat tambahan 2 (dua) jenis risiko lainnya yang dikelola yaitu:

Considering that the Company also has Subsidiaries as Islamic Commercial Banks (BUS), the risk management is not only conducted on 8 (eight) risks, but there are also an additional 2 (two) types of risks managed, namely:

**Risiko Investasi**

Risiko Investasi adalah Risiko akibat Perusahaan ikut menanggung kerugian usaha nasabah yang dibiayai dalam pembiayaan berbasis bagi hasil baik yang menggunakan metode net *revenue sharing* maupun yang menggunakan metode *profit and loss sharing*.

**Investment Risk**

Investment Risk is the risk due to the Company share in the loss of the customer's business financed in the profit-sharing based financing using the net revenue sharing method or the profit and loss sharing method.

Sumber Risiko Investasi Perusahaan berasal dari anak perusahaan, dimana Unit Usaha Syariah telah *spin off* menjadi PT Bank Nano Syariah efektif mulai 1 Januari 2024. Risiko investasi merupakan turunan risiko kredit yang timbul karena aktivitas pembiayaan PT Bank Nano Syariah yang menggunakan akad berbasis bagi hasil yaitu akad Mudharabah dan akad Musyarakah.

The source of the company's investment risk originates from its subsidiaries, where the Sharia Business Unit has been spunsh off into PT Bank Nano Syariah effective January 1, 2024. Investment risk is a derivative of credit risk arising from the financing activities of PT Bank Nano Syariah that utilize profit-sharing agreements, namely Mudharabah and Musyarakah agreements.

PT Bank Nano Syariah telah melakukan penyusunan kebijakan dan/atau ketentuan internal di bidang pembiayaan dan/atau penyediaan dana lainnya untuk mendukung pengelolaan penyediaan dana yang sehat dan sesuai prinsip kehati-hatian serta sesuai dengan prinsip syariah. Selain itu, PT Bank Nano Syariah berupaya melakukan diversifikasi *portofolio* dengan meningkatkan *outstanding* pembiayaan *non*-korporasi sesuai Rencana Bisnis Bank guna menurunkan risiko konsentrasi penyediaan dana melalui produk KUR dan *Micro* Faedah, pembiayaan Haji, pembiayaan alat berat (*heavy equipment*), dan pembiayaan alat-alat pertanian dimana produk-produk tersebut menggunakan akad Murabahah dan Ijarah.

PT Bank Nano Syariah has established policies and/or internal regulations in the field of financing and/or other fund provision to support the management of healthy fund provision in accordance with the principles of prudence and in compliance with Sharia principles. In addition, PT Bank Nano Syariah strives to diversify its portfolio by increasing the outstanding non-corporate financing in accordance with the Bank's Business Plan to reduce the concentration risk of fund provision through KUR and Micro Faedah products, Hajj financing, heavy equipment financing, and agricultural equipment financing, where these products utilize Murabahah and Ijarah contracts.

**Risiko Imbal Hasil**

Risiko imbal hasil (*Rate of Return Risk*) adalah risiko akibat perubahan tingkat imbal hasil yang dibayarkan Perusahaan kepada nasabah, karena terjadi perubahan tingkat imbal hasil yang diterima Perusahaan dari penyaluran dana, yang dapat mempengaruhi perilaku nasabah dana pihak ketiga Perusahaan.

Sumber risiko imbal hasil Perusahaan berasal dari Entitas Anak, dimana Unit Usaha Syariah telah *spin off* menjadi PT Bank Nano Syariah efektif mulai 1 Januari 2024.

Pengelolaan terhadap tingkat imbal hasil kepada deposan masih terjaga dan terkelola dengan memadai. PT Bank Nano Syariah terus berupaya untuk semakin meningkatkan kemampuan dalam memberikan tingkat imbal hasil sesuai dengan ekspektasi nasabah. Selain itu, PT Bank Nano Syariah telah melakukan berbagai upaya perbaikan pada kualitas pembiayaan guna mitigasi potensi penurunan imbal hasil yang diterima bank dari penyaluran dana, antara lain dengan melakukan evaluasi dan monitoring secara ketat terhadap debitur-debitur yang bermasalah, dan menyusun *action plan* untuk meningkatkan portofolio melalui pengembangan produk-produk pembiayaan sehingga diharapkan dapat men-*generate* peningkatan imbal hasil.

Selain itu, Perusahaan juga merupakan Entitas Utama (EU) dalam Konglomerasi Keuangan Sinar Mas. Pengelolaan risiko oleh EU dalam konglomerasi keuangan dilakukan dengan menambahkan risiko lain selain 8 (delapan) risiko utama dan 2 (dua) risiko sehubungan Perusahaan memiliki anak usaha berupa Bank Umum Syariah (Bank Nano Syariah) yaitu terdapat 2 (dua) tambahan risiko yaitu berupa Risiko Transaksi Intra-grup dan Risiko Asuransi sehubungan Perusahaan merupakan entitas utama dalam Konglomerasi Keuangan.

1. Risiko Transaksi Intra-grup adalah risiko akibat ketergantungan suatu entitas baik secara langsung maupun tidak langsung terhadap entitas lainnya dalam satu Konglomerasi Keuangan dalam rangka pemenuhan kewajiban perjanjian tertulis maupun perjanjian tidak tertulis baik yang diikuti perpindahan dana dan/atau tidak diikuti perpindahan dana. Dalam pengelolaan transaksi intragrup tersebut Perusahaan selalu mengedepankan prinsip-prinsip antara lain seperti adanya persetujuan untuk setiap transaksi sesuai dengan kewenangan di masing-masing entitas, transaksi dilaksanakan sesuai prinsip kehati-hatian dan prinsip *arm's length* serta sesuai dengan prosedur maupun ketentuan regulator.

**Rate of Return Risk**

Rate of Return Risk is the risk arising from changes in the rate of return paid by the Company to customers, due to fluctuations in the rate of return received by the Company from fund disbursement, which can affect the behavior of third-party fund customers.

The source of the Company's return risk comes from the Subsidiary, where the Sharia Business Unit has been spun off into PT Bank Nano Syariah effective January 1, 2024.

The management of the level of returns to depositors is still maintained and adequately managed. PT Bank Nano Syariah continues to strive to further improve its ability to provide yield levels in accordance with customer expectations. In addition, PT Bank Nano Syariah has made various efforts to improve the quality of financing to mitigate the potential for a decrease in returns received by banks from the distribution of funds, including by conducting strict evaluation and monitoring of problematic debtors, and preparing an action plan to increase the portfolio through the development of financing products so that it is expected to generate an increase in returns.

Furthermore, the Company is also the Main Entity (EU) within the Sinar Mas Financial Conglomerate. Risk management by the EU in the financial conglomerate is carried out by adding other risks in addition to the 8 (eight) main risks and 2 (two) risks related to the Company has a subsidiary in the form of a Sharia Commercial Bank (Bank Nano Syariah), which includes 2 (two) additional risks, namely Intra-group Transaction Risk and Insurance Risk, as the Company is the main entity in the Financial Conglomerate.

1. Intra-group Transaction Risk is the risk due to the dependence of an entity, either directly or indirectly, on another entity in a Financial Conglomeration in the context of fulfilling the obligations of a written agreement or an unwritten agreement, whether followed by a transfer of funds and/ or not followed by a transfer of funds. In the management of these intragroup transactions, the Company always puts forward principles, such as approval for each transaction in accordance with the authority of each entity, transactions are carried out in accordance with prudential principles and arm's length principles and in accordance with regulatory procedures and regulations.

2. Risiko asuransi adalah risiko akibat kegagalan perusahaan asuransi memenuhi kewajiban kepada pemegang polis sebagai akibat dari ketidakcukupan proses seleksi risiko (*underwriting*), penetapan premi (*pricing*), penggunaan reasuransi, dan/atau penanganan klaim. Risiko asuransi dikelola mengingat didalam konglomerasi keuangan terdapat lembaga jasa keuangan berupa perusahaan asuransi dan *re*-asuransi.

2. Insurance risk is the risk due to failure of the insurance company to fulfill its obligations to policyholders as a result of inadequate risk selection processes (underwriting), determination of premiums (pricing), use of reinsurance, and / or handling of claims. Insurance risk is managed considering that in a financial conglomerate there is a financial service institution in the form of an insurance company and reinsurance.

Pada tahun 2024 telah dilakukan kaji ulang parameter, bobot risiko dan *threshold* profil risiko yang telah disusun dan disampaikan serta disetujui oleh Komite Manajemen Risiko Terintegrasi. Selain itu Perusahaan telah memiliki *Risk Appetite & Risk Tolerance* Terintegrasi Konglomerasi Keuangan Sinar Mas yang terlah disetujui oleh Komite Manajemen Risiko Terintegrasi serta dilakukan pemantauan secara berkala dan disampaikan kepada anggota Komite Manajemen Risiko Terintegrasi melalui rapat.

In 2024, a review of the parameters, risk weights, and risk profile thresholds that have been prepared, presented, and approved by the Integrated Risk Management Committee has been conducted. Additionally, the Company has established an Integrated Risk Appetite & Risk Tolerance for the Sinar Mas Financial Conglomerate, which has been approved by the Integrated Risk Management Committee and is subject to regular monitoring and reporting to the members of the Integrated Risk Management Committee through meetings.

Perusahaan selaku Entitas Utama Konglomerasi Keuangan Sinar Mas telah melakukan peniliaian sendiri (*self assesment*) secara berkala minimum 6 (enam) bulan sekali sesuai dengan ketentuan yang telah ditetapkan serta melakukan pemantauan *risk appetite* dan *risk tolerance* yang disampaikan kepada Komite Manajemen Risiko Terintegrasi melalui rapat komite dan kepada Dewan komisaris Entitas Utama melalui surel sebagai salah satu bentuk tugas dan tanggung Jawab Dewan Komisaris Entitas Utama.

The Company as the Main Entity of the Sinar Mas Financial Conglomerate, has conducted a self-assessment periodically at least once every 6 (six) months in accordance with the established regulations and has monitored the risk appetite and risk tolerance communicated to the Integrated Risk Management Committee through committee meetings and to the Board of Commissioners of the Main Entity via email as one of the duties and responsibilities of the Board of Commissioners of the Main Entity.

Selain itu, saat ini Konglomerasi Keuangan Sinar Mas sedang melakukan pengembangan sistem pelaporan terintegrasi yaitu *Financial Services Integrated System* (FSIS) yang di bagi menjadi 4 (empat) fase yaitu fase 1 terkait Otomasi Laporan Profil Risiko Terintegrasi, fase 2 terkait Otomasi Laporan KPMM Terintegrasi dan Transaksi Intragrup, fase 3 terkait Otomasi penyusunan dan monitoring *Risk Appetite & Risk Tolerance* Terintegrasi dan fase 4 terkait Otomasi penyusunan *Stress Testing* Terintegrasi. Proses otomasi ini dilakukan dengan tujuan pelaporan eksposur risiko Konglomerasi Keuangan Sinar Mas lebih akurat, tepat dan memadai serta sebagai mitigasi risiko operasional terutama dari *human error*.

In addition, the Sinar Mas Financial Conglomerate is currently developing an integrated reporting system, namely the Financial Services Integrated System (FSIS), which is divided into four phases: phase 1 related to the Automation of Integrated Risk Profile Reports, phase 2 related to the Automation of Integrated KPMM Reports and Intragroup Transactions, phase 3 related to the Automation of the preparation and monitoring of Integrated Risk Appetite & Risk Tolerance, and phase 4 related to the Automation of Integrated Stress Testing preparation. This automation process is carried out with the aim of making the reporting of the Sinar Mas Financial Conglomerate's risk exposure more accurate, precise, and adequate, as well as serving as a mitigation of operational risks, especially from human error.

**Penilaian Profil Risiko**

Secara berkala Perusahaan melakukan penilaian risiko terhadap kedelapan risiko diatas sebagaimana telah diatur oleh OJK. Penilaian risiko dilakukan melalui proses penilaian sendiri (*self-assessment*) untuk menghasilkan profil risiko yang terdiri dari risiko inheren yaitu risiko yang melekat pada aktivitas Perusahaan dan kualitas penerapan manajemen risiko yaitu pengendalian terhadap risiko inheren.

Pada Semester II - Desember 2024, Perusahaan telah melakukan penilaian Profil Risiko dengan menggunakan parameter, rentang risiko dan bobot risiko yang telah ditetapkan oleh Komite Manajemen Risiko dan/atau Direksi. Secara Keseluruhan penilaian komposit hasil penilaian sendiri (*self assessment*) profil risiko Semester II - Desember 2024 berada pada peringkat 2 (dua) - *Low to Moderate* dengan tren stabil dengan penilaian risiko melekat (*inherent risk*) pada peringkat 2 (dua) atau *Low to Moderate* dan Kualitas Penerapan Manajemen Risiko (KPMR) pada peringkat 2 (dua) atau *Satisfactory*.

Selain itu, pada Semester II - Desember 2024, Perusahaan juga telah melakukan penilaian Profil Risiko secara konsolidasi dengan Bank Nano Syariah selaku anak usaha, dengan menggunakan parameter, rentang risiko dan bobot risiko yang telah ditetapkan oleh Komite Manajemen Risiko dan/atau Direksi. Secara Keseluruhan penilaian komposit hasil penilaian sendiri (*self assessment*) profil risiko konsolidasi Semester II - Desember 2024 berada pada peringkat 2 (dua) - *Low to Moderate* dengan tren stabil dengan penilaian risiko melekat (*inherent risk*) pada peringkat 2 (dua) atau *Low to Moderate* dan Kualitas Penerapan Manajemen Risiko (KPMR) pada peringkat 2 (dua) atau *Satisfactory* dan tidak mengalami perubahan dari Semester I - Juni 2024.

Selain penilaian sendiri (*self assesment*) Profil Risiko yang dilakukan pada Bank secara individual dan konsolidasi dengan perusahaan anak, perusahaan juga melakukan penilaian sendiri (*self assesment*) atas penilaian Profil Risiko Terintegrasi dengan menggunakan parameter, rentang risiko dan bobot risiko yang telah ditetapkan oleh Komite Manajemen Risiko Terintegrasi. Pada Semester II - Desember 2024 secara keseluruhan penilaian komposit hasil penilaian sendiri (*self assessment*) profil risiko berada pada peringkat 2 (dua) - *Low to Moderate* dengan tren stabil dengan penilaian risiko melekat (*inherent risk*) pada peringkat 2 (dua) atau *Low to Moderate* dan Kualitas Penerapan Manajemen Risiko (KPMR) pada peringkat 2 (dua) atau *Satisfactory*, dan tidak mengalami perubahan dari Semester I - Juni 2024.

**Risk Profile Assessment**

The Company periodically conducts risk assessment of the eighth risks above per OJK's regulation. The Company's risks assessment is evaluated through self assessment process to produce a risk profile which consists of inherent risks to the Company's activity and the quality of risk management implementation i.e., control of inherent risk.

In Second Semester - December 2024, the Company has conducted a Risk Profile assessment using the parameters, risk range, and risk weights established by the Risk Management Committee and/or the Board of Directors. Overall, the composite assessment results of the self-assessment of the risk profile for Second Semester - December 2024 are rated at 2 (two) - Low to Moderate with a stable trend, with inherent risk rated at 2 (two) or Low to Moderate and the Quality of Risk Management Implementation (KPMR) rated at 2 (two) or Satisfactory.

In addition, in Second Semester - December 2024, the Company has also conducted a consolidated Risk Profile assessment with Bank Nano Syariah as a subsidiary, using parameters, risk ranges, and risk weights established by the Risk Management Committee and/or the Board of Directors. Overall, the composite assessment results of the self-assessment of the consolidated risk profile for Second Semester – December 2024 are rated 2 (two) - Low to Moderate with a stable trend, with inherent risk rated at 2 (two) or Low to Moderate and the Quality of Risk Management Implementation (KPMR) rated at 2 (two) or Satisfactory, showing no changes from First Semester I - June 2024.

In addition to the self-assessment of the Risk Profile conducted at the Bank on an individual and consolidated basis with subsidiaries, the company also performs a self-assessment of the Integrated Risk Profile assessment using parameters, risk ranges, and risk weights established by the Integrated Risk Management Committee. In the Second Semester - December 2024, the overall composite assessment result of the self-assessment of the risk profile is at rank 2 (two) - Low to Moderate with a stable trend, with inherent risk at rank 2 (two) or Low to Moderate and the Quality of Risk Management Implementation (KPMR) at rank 2 (two) or Satisfactory, showing no changes from the First Semester - June 2024.

## 46. Informasi Lainnya

Perusahaan telah menghitung beberapa rasio (individu) pada tanggal 31 Desember 2024 dan 2023 (tidak diaudit) sebagai berikut:

## 46. Other Information

Company has calculated certain (individual) ratios as at December 31, 2024 and 2023 (unaudited) as follow:

| | 2024 | 2023 | |
|---|---|---|---|
| Aset produktif bermasalah terhadap total aset produktif | 1,71% | 1,66% | Impaired productive assets to total productive assets |
| *Non Performing Loan (NPL)* | | | Non Performing Loan (NPL) |
| NPL secara bruto | 1,88% | 1,53% | NPL gross |
| NPL secara neto | 0,38% | 0,35% | NPL net |
| *Loan to Deposit Ratio (LDR)* | 30,60% | 40,94% | Loan to Deposit Ratio (LDR) |
| *Return On Assets (ROA)* | 0,57% | 0,15% | Return On Assets (ROA) |
| *Return On Equity (ROE)* | 3,03% | 1,07% | Return On Equity (ROE) |
| Cadangan kerugian penurunan nilai kredit terhadap kredit yang diberikan | 10,79% | 9,99% | Allowance for impairment losses of net loans to total loans |

a. Pada tanggal 31 Desember 2024 dan 2023, tidak terdapat penyediaan dana kepada pihak berelasi dan pihak ketiga yang melampaui Batas Maksimum Pemberian Kredit (BMPK) Perusahaan.

a. As at December 31, 2024 and 2023, there are no loans granted to related and third parties which had exceeded the Company's Legal Lending Limit (LLL).

b. Penerapan Program Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme (APU dan PPT).

   Perusahaan senantiasa menerapkan prinsip APU dan PPT dalam pelaksanaan aktivitas pengenalan nasabah dengan mengacu pada kebijakan dan prosedur APU dan PPT yang telah disempurnakan sesuai dengan Peraturan Bank Indonesia No. 14/27/PBI/2012 tentang Penerapan Program Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme Bagi Bank Umum.

   Kewajiban untuk menerapkan prinsip APU dan PPT tidak hanya terdapat dalam Peraturan Bank Indonesia saja, tetapi juga ditegaskan dalam Undang-Undang Nomor 8 Tahun 2010 tentang Pencegahan dan Pemberantasan Tindak Pidana Pencucian Uang (Pasal 19), yang pada intinya menjelaskan bahwa setiap orang yang melakukan usaha dengan penyedia jasa keuangan harus menyerahkan identitas diri secara lengkap, disamping itu penyedia jasa keuangan juga harus memastikan orang yang melakukan hubungan usaha bertindak untuk diri sendiri atau orang lain. Jika bertindak untuk orang lain, maka penyedia jasa keuangan harus meminta informasi mengenai identitas pihak lain tersebut.

   Perusahaan akan terus memastikan bahwa kebijakan dan prosedur tertulis mengenai program APU dan PPT sejalan dengan perkembangan modus pencucian uang atau pendanaan terorisme.

b. Application of Anti-Money Laundering and Combating the Financing of Terrorism (APU and PPT).

   The Company continues to apply the principle of APU and PPT in the implementation of customer recognition activities with reference to the policies and procedures for APU and PPT that has been perfected in accordance with Bank Indonesia Regulation No. 14/27/PBI/2012 on Application of Anti-Money Laundering and Combating the Financing of Terrorism for Commercial Bank.

   The obligation to apply the principles of APU and PPT is not only contained in the Regulation of Bank Indonesia, but also affirmed in Law No. 8 of 2010 on the Prevention and Suppression of Money Laundering (Article 19), which basically states that any person doing business with financial service providers must submit a complete identity, that besides financial services providers should also make sure the people who engage in business relations act for themselves or others. If acting for others, then financial services providers should request information about the identity of the other party.

   The Company will continue to ensure that the policies and procedures of the APU and PPT programs are in line with the development mode of money laundering or terrorist financing.

Pengkinian terhadap seluruh data nasabah dilakukan Perusahaan secara terus-menerus dengan menggunakan pendekatan berdasarkan risiko yang melekat pada nasabah yang bersangkutan dan perkembangan pengkinian data nasabah dikirimkan oleh Perusahaan kepada Bank Indonesia melalui Laporan Direktur Kepatuhan.

Pelatihan secara berkala kepada seluruh karyawan Perusahaan mengenai APU dan PPT dan peraturan *prudential banking* dilakukan oleh Unit Kepatuhan guna mewujudkan budaya kepatuhan pada seluruh lini bisnis Perusahaan. Pelatihan dilakukan melalui *e-learning* yang dapat diakses oleh karyawan Perusahaan serta melalui metode tatap muka secara periodik.

Updating of all customer data by the Company is on an ongoing basis using an approach based on the risk inherent in the development of the client and updating customer data submitted to Bank Indonesia through the Director of Compliance Reports.

Periodic training of all employees regarding the APU and PPT and prudential banking regulations is made by the Compliance Unit in order to create a culture of compliance in all business lines of the Company. The Training is done through e-learning that can be accessed by employees of the Company and through face-to-face method periodically.

c. Jaminan Pemerintah Terhadap Liabilitas Pembayaran Bank Umum

Program penjaminan Pemerintah dilaksanakan oleh Lembaga Penjamin Simpanan (LPS).

LPS akan membayarkan klaim penjaminan yang layak dibayar setelah melalui prosedur rekonsiliasi dan/atau verifikasi sesuai dengan Peraturan Lembaga Penjamin Simpanan (PLPS) yang berlaku.

c. Government Guarantee on Obligations of Commercial Banks

Government guarantee program is implemented by the Deposit Guarantor Agency (LPS).

The Deposit Guarantor Agency will settle the qualified guaranteed claims based on results of reconciliation and/or verification procedures in accordance with prevailing Deposit Guarantor Agency Regulations.

d. Kegiatan Wali Amanat

Perusahaan memperoleh izin untuk menyelenggarakan kegiatan Wali Amanat dari Otoritas Jasa Keuangan (OJK) (d/h. BAPEPAM-LK) berdasarkan Surat Tanda Terdaftar Sebagai Wali Amanat No. 01/BL/STTD-WA/2009 tanggal 27 Agustus 2009 dan telah diperbarui sesuai surat OJK nomor S-682/PM.223/2022 tanggal 22 Agustus 2022.

Jasa-jasa yang dilakukan oleh Perusahaan sebagai Wali Amanat adalah sebagai berikut:

1. Jasa wali amanat dan agen pemantau untuk penerbitan obligasi/ sukuk dan MTN
2. Jasa agen jaminan

Sejak tahun 2010 Perusahaan telah mewaliamanati 3 obligasi dengan nilai emisi sebesar Rp 2,8 triliun dan 21 MTN dengan total emisi sebesar Rp 4,11 triliun.

d. Trusteeship Activities

The Company was granted with the license to conduct trusteeship activity from the Capital Market Supervisory Agency (Bapepam-LK, now known as the Financial Services Authority or "OJK") based on the decision letter No. 01/BL/STTD-WA/2009 dated August 27, 2009 which was renewed as per the letter of the OJK number S-682/PM.223/2022 dated August 22, 2022.

The services provided by the Company as a trustee are as follows:

1. Trustee and monitoring agent services for the issuance of bonds/sukuk and MTN
2. Security agent service

Since 2010, the Company has acted as Trustee for 3 bonds issuance with emission value of Rp2.8 trillion and 21 MTN issuance with total issuance of Rp4.11 trillion.

e. Kegiatan Jasa Kustodian

Perusahaan memberikan jasa kustodian dan memperoleh izin jasa kustodian berdasarkan Surat Keputusan Bapepam-LK No. KEP-21/BL/2012 tanggal 30 Januari 2012 yang diperbaharui dengan Surat Otoritas Jasa Keuangan (OJK) nomor S-682/PM.223/2022 tanggal 22 Agustus 2022.

Sejak September 2022, Perusahaan telah menyediakan jasa-jasa kustodian yang secara garis besar dapat dibagi menjadi dua yaitu Layanan Kustodian Umum dan Layanan Pengadministrasian *Fund*.

Layanan Kustodian Umum terdiri dari penyimpanan dan penyelesaian transaksi efek, pengurusan hak-hak nasabah yang melekat pada efek, dan jasa perwakilan pada RUPS dan Rapat Umum Pemegang Obligasi (RUPO).

Layanan Pengadministrasian Fund untuk reksa dana, kontrak pengelolaan dana (KPD), unit *link* dan produk-produk berbasis kontrak investasi kolektif lainnya yang terdiri-dari layanan *Fund Accounting* dan jasa unit registrar untuk pengadministrasian unit penyertaan produk-produk tersebut.

Aset nasabah yang diadministrasikan meliputi aset domestik yang disimpan dan ditatausahakan di sentral kustodian domestik (KSEI) dan *offshore asset* yang disimpan di *Clearstream Banking*.

Per 30 Desember 2024, Bank Kustodian Perusahaan telah mengadministrasikan aset nasabah dengan total Rp20,57 triliun baik individu mapun institusional dari berbagai industri seperti Bank, Manajer Investasi, Sekuritas, Asuransi, Dana Pensiun dan Korporasi lainnya.

Perusahaan mengasuransikan portofolio nasabah yang disimpan di Bank Sinarmas Kustodian terhadap kemungkinan kerugian yang timbul dari penyimpanan dan pemindahan efek sesuai dengan ketentuan Otoritasi Jasa Keuangan.

e. Custodian Services Activities

The Company has provided custodian services and obtained license to provide custodian services from the Capital Market Supervisory Agency (Bapepam-LK, now known as the Financial Services Authority or "OJK") based on Decree No. KEP-21/BL/2012 dated January 30, 2012 which was renewed by Letter of the OJK number S-682/PM.223/2022 dated August 22, 2022.

Since September 2022, the Company has provided custodial services which in general can be divided into two, Custody Services and Fund Services.

Custody Services consist of safekeeping and settlement of securities transaction, management of rights attached to customer's securities, and proxy services at GSM and General Bondholder's Meeting (GBM).

Fund Services for mutual funds, discretionary fund, unit links and other collective investment contract-based products, consist of fund accounting services and unit registry/transfer agent services for administering unit participation in these products.

The assets of the clients being administered include domestic assets that are held and recorded at the domestic central custodian (KSEI) and offshore assets that are held at Clearstream Banking.

As of December 30, 2024, the Custodian Bank of the Company has administered client assets totaling Rp20.57 trillion, both individual and institutional, from various industries such as Banking, Investment Management, Securities, Insurance, Pension Funds, and other Corporations.

The Company insures the customer's portfolio held at Bank Sinarmas Custodian against possible losses arising from securities depository and transfer in accordance with Financial Services Authority (OJK) regulations.

## 47. Pengungkapan Tambahan Laporan Arus Kas

Aktivitas investasi dan pendanaan yang tidak mempengaruhi kas dan setara kas:

| | 2024 | 2023 | |
|---|---|---|---|
| Penghapusbukuan kredit | 188.977 | 1.220.668 | Write-off of loans |
| Penghapusbukuan aset tetap | 66 | 129 | Write-off of property and equipment |

## 47. Additional Disclosures on Statements of Cash Flows

Non-cash investing and investing activities that do not affect cash and cash equivalents:

## 48. Rekonsiliasi Liabilitas yang Timbul dari Aktivitas Pendanaan

Tabel berikut menjelaskan perubahan pada liabilitas Perusahaan yang timbul dari aktivitas pendanaan, yang meliputi perubahan terkait kas dan non-kas:

| | 1 Januari/ *January 1,* 2024 | Arus kas pendanaan/ *Financing cash flows* | Perubahan nonkas/ *Non-cash Changes* *Perubahan lainnya/ Other changes* | 31 Desember/ *December 31,* 2024 | |
|---|---|---|---|---|---|
| Liabilitas sewa | 133.368 | (117.903) | 114.451 | 129.916 | Lease Liabilities |
| Obligasi Subordinasi | 496.512 | - | 993 | 497.505 | Subordinated Bonds |
| Jumlah | 629.880 | (117.903) | 115.444 | 627.421 | Total |

| | 1 Januari/ *January 1,* 2023 | Arus kas pendanaan/ *Financing cash flows* | Perubahan nonkas/ *Non-cash Changes* *Perubahan lainnya/ Other changes* | 31 Desember/ *December 31,* 2023 | |
|---|---|---|---|---|---|
| Liabilitas sewa | 113.628 | (111.120) | 130.860 | 133.368 | Lease Liabilities |
| Obligasi Subordinasi | 495.040 | - | 1.472 | 496.512 | Subordinated Bonds |
| Jumlah | 608.668 | (111.120) | 132.332 | 629.880 | Total |

## 48. Reconciliation of Liabilities Arising from Financing Activities

The table below details the changes in the Company's liabilities arising from financing activities, including both cash and non-cash changes:

## 49. Standar Akuntansi Keuangan Baru

Perubahan Pernyataan Standar Akuntansi Keuangan (PSAK)

Berlaku efektif sejak 1 Januari 2024

Perubahan dan interpretasi standar akuntansi keuangan yang berlaku efektif sejak 1 Januari 2024 adalah sebagai berikut:

- Amendemen PSAK No. 201, "Penyajian Laporan Keuangan" terkait Liabilitas Jangka Panjang dengan Kovenan
- Amendemen PSAK No. 116, "Sewa" terkait Liabilitas Sewa pada Transaksi Jual dan Sewa-balik

## 49. New Financial Accounting Standards

Changes to the Statements of Financial Accounting Standards (SFAS)

Effective from January 1, 2024

The changes and interpretations of the financial accounting standards which become effective from January 1, 2024 are as follows:

- Amendment to SFAS No. 201, "Presentation of Financial Statements" regarding Long-term Liabilities with the Covenant
- Amendment to SFAS No. 116, "Leases" regarding Lease Liabilities in Sale-and-lease Back Transaction

Penerapan standar akuntansi keuangan revisi berikut, yang berlaku efektif 1 Januari 2025, relevan bagi Bank namun tidak menyebabkan perubahan signifikan atas kebijakan akuntansi Bank dan tidak berdampak material terhadap jumlah-jumlah yang dilaporkan dalam laporan keuangan tahun berjalan:

Diterapkan pada tahun 2025

- Amandemen PSAK No. 117, "Kontrak Asuransi"
- Amendemen PSAK No. 221. "Pengaruh Perubahan Kurs Valuta Asing

Sampai dengan tanggal penerbitan laporan keuangan, Perusahaan masih mempelajari dampak yang mungkin timbul dari penerapan amendemen PSAK tersebut dan dampak tersebut pada laporan keuangan belum dapat ditentukan.

The implementation of the following revised finansial accounting standards, which are effective from Januari 1, 2025 and relevant for the Bank, did not result in substantial changes to the Bank's accounting policies and had no material effect on the amounts reported in the current year's finansial statements:

Adopted during 2025

- Amendment to SFAS No. 117, "Insurance Contracts"
- Amendment to SFAS No. 221, "The Effects of Changes in Foreign Exchange Rates"

As at the date of authorization of these financial statements, the Company' still evaluating the potential impact of the above amendments to SFAS and has not yet determined the related effects on the financial statements.

## 50. Informasi Tambahan yang Tidak Dipersyaratkan oleh Standar Akuntansi Keuangan Indonesia

## 50. Additional Information that is Not Required by Indonesian Accounting Standards

a. Giro pada Bank Indonesia

Rasio GWM Perusahaan untuk mata uang Rupiah dan mata uang asing pada tanggal 31 Desember 2024 dan 2023 adalah:

a. Current Accounts with Bank Indonesia

The Company's minimum liquidity reserve ratio for foreign and Rupiah currencies as of December 31, 2024 and 2023 are as follows:

| | 2024 | 2023 | |
|---|---|---|---|
| | % | % | |
| GWM yang telah dibentuk | | | Company's liquidity reserve |
| Rupiah | | | Rupiah |
| GWM Primer | | | Primary reserve |
| Konvensional | 12,63 | 10,08 | Conventional |
| Syariah | 14,23 | 37,83 | Sharia |
| GWM Sekunder/PLM | | | Secondary reserve |
| Konvensional | 30,24 | 23,03 | Conventional |
| Mata uang asing | | | Foreign currency |
| Konvensional | 4,05 | 4,10 | Conventional |

Pengungkapan lebih lanjut giro pada Bank Indonesia diungkapkan pada Catatan 4

The further disclosures on current accounts with Bank Indonesia are presented in Note 4.

b. Giro pada Bank Lain

Pada tanggal 31 Desember 2024 dan 2023, kualitas giro pada bank lain dikelompokkan sebagai aset tetap lancar dan tidak terdapat saldo giro pada bank lain yang diblokir.

b. Current Accounts with Other Banks

As of December 31, 2024 and 2023, all demand deposits with other banks are classified as current and there are no demand deposits with other banks which are restricted.

| | 2024 | 2023 | |
|---|---|---|---|
| Suku bunga rata-rata | | | Average interest rate |
| Rupiah | 1,00% | 1,00% | Rupiah |
| Mata uang asing | 0,61% | 0,61% | Foreign currencies |

Pengungkapan lebih lanjut giro pada Bank lain diungkapkan pada Catatan 5.

The further disclosures on current accounts with other Banks are presented in Note 5.

c. Penempatan pada Bank Indonesia dan Bank Lain

Pada tanggal 31 Desember 2024 dan 2023, penempatan pada Bank Indonesia dan bank lain dikelompokkan sebagai Lancar dan tidak terdapat penempatan yang dijaminkan maupun yang diblokir.

Pengungkapan lebih lanjut penempatan pada Bank Indonesia dan bank lain diungkapkan pada Catatan 6.

c. Placements with Bank Indonesia and Other Banks

As of December 31, 2024 and 2023, all placements with Bank Indonesia and other banks are classified as Current and there are no placements that are pledged as collateral or considered as blocked.

The further disclosures on placements with Bank Indonesia and other banks are presented in Note 6.

d. Efek-efek

Pada tanggal 31 Desember 2024 dan 2023, seluruh efek-efek dikelompokkan sebagai Lancar, kecuali untuk efek-efek dalam kelompok Macet sebesar Rp463.814 dan Rp472.760.

Pengungkapan lebih lanjut efek-efek diungkapkan pada Catatan 7.

d. Securities

As at December 31, 2024 and 2023, all securities are classified as Current, except for Loss securities amounting to Rp463,814 and Rp472,760.

The further disclosures on Securities are presented in Note 7.

e. Kredit yang Diberikan dan Piutang/ Pembiayaan Syariah

Pada tanggal 31 Desember 2024 dan 2023, rincian kredit bermasalah menurut sektor ekonomi sesuai ketentuan Otoritas Jasa Keuangan adalah sebagai berikut:

e. Loans and Receivables/Sharia Financing

The details of non-performing loans as of December 31, 2024 and 2023, based on economic sectors according to Otoritas Jasa Keuangan regulation are as follows:

| | 2024 | 2023 | |
|---|---|---|---|
| Rupiah | | | Rupiah |
| Perdagangan besar dan eceran, reparasi, dan perawatan mobil dan sepeda motor | 148.813 | 22.068 | Whole sale and retail, repair, and maintenance of cars and motorcycles |
| Rumah tangga | 53.871 | 72.315 | Household |
| Bukan lapangan usaha lainnya | 5.006 | 727 | Not other business fields |
| Industri pengolahan | 3.786 | 3.961 | Processing industry |
| Pertanian, kehutanan dan perikanan | 3.325 | 3.062 | Agriculture, foresty and fishery |
| Aktivitas penyewaan dan sewa guna usaha tanpa hak opsi, ketenagakerjaan, agen | 1.066 | 636 | Leasing and leasing activities without option rights, employment, travel agent |
| Penyediaan akomodasi dan penyediaan makan minum perjalanan dan penunjang usaha lainnya | 798 | 4.304 | Accomodation and food and beverage and other business support |
| Pengangkutan dan pergudangan | 560 | 393 | Transportation and warehousing |
| Aktivitas jasa lainnya | 244 | 1.200 | Other service activities |
| Informasi dan komunikasi | 110 | 2.355 | Information and communication |
| Aktivitas keuangan dan asuransi | 60 | 166 | Financial and insurance activities |
| Aktivitas profesional, ilmiah, dan teknis | 32 | 57 | Professional, scientific and technical activity |
| Aktivitas kesehatan manusia dan aktivitas sosial | 9 | 147.973 | Human health activities and social activities |
| Konstruksi | - | 737 | Contructions |
| Jasa pendidikan | - | 36 | Education services |
| Pengelolaan air, pengelolaan air limbah, pengelolaan dan daur ulang sampah, dan aktivitas remediasi | - | 14 | Water management, waste water management, management and waste recycling, and remediation activities |
| **Jumlah** | **217.680** | **260.004** | **Total** |

Pada tanggal 31 Desember 2024 dan 2023, kredit non-performing yang telah dihentikan pembebanan bunganya/bagi hasilnya masing-masing adalah sebesar Rp217.680 dan Rp260.004.

As of December 31, 2024 and 2023, interest/profit sharing not accrued on non-performing loans amounted to Rp217,680 and Rp260,004, respectively.

Untuk tahun-tahun yang berakhir 31 Desember 2024 dan 2023, jumlah kredit yang direstrukturisasi masing-masing sebesar Rp93.074 dan Rp479.140.

For the years ended December 31, 2024 and 2023, total restructured loans amounted to Rp93,074 and Rp479,140, respectively.

Pengungkapan lebih lanjut pada Kredit yang Diberikan dan Pembiayaan/Piutang Syariah diungkapkan pada Catatan 9.

The further disclosures on Loans and Sharia Financing/Receivables are presented in Note 9.

f. Tagihan dan Liabilitas Akseptasi

f. Acceptances Receivables and Payable

Kolektibilitas tagihan akseptasi pada tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut:

Collectibility of acceptances receivable as at December 31, 2024 and 2023 are follows:

| | 2024 | 2023 | |
|---|---|---|---|
| Rupiah | | | Rupiah |
| Pihak ketiga | | | Third parties |
| Lancar | 7.382 | 29.791 | Current |
| Mata uang asing (Catatan 39) | | | Foreign currencies (Note 39) |
| Pihak ketiga | | | Third parties |
| Lancar | 30.762 | 50.073 | Current |
| **Jumlah** | **38.144** | **79.864** | **Total** |

Pengungkapan lebih lanjut pada Tagihan dan Liabilitas Akseptasi diungkapkan pada Catatan 10.

The further disclosures on Acceptances Receivable and Payable are presented in Note 10.

g. Aset dan Liabilitas dalam Mata Uang Asing

g. Monetary Assets and Liabilities Denominated in Foreign Currencies

Posisi Devisa Neto (PDN)

Net Open Position (NOP)

Berikut ini disajikan rincian posisi devisa neto Perusahaan sebagaimana disampaikan Perusahaan kepada Bank Indonesia:

The Company's net open position as submitted to Bank Indonesia follows:

| | 2024 | | | |
|---|---|---|---|---|
| | Laporan Posisi Keuangan dan Rekening Administratif/ *Statements of Financial Position and Administrative Account* | | Bersih Absolut/ *Net Absolute* | |
| **Mata Uang** | **Aset/ *Assets*** | **Liabilitas/ *Liabilities*** | | **Currencies** |
| Dolar Amerika Serikat | 7.185.250 | 7.232.443 | 47.193 | United States Dollar |
| Yen Jepang | 13.450 | 7.012 | 6.438 | Japanese Yen |
| Dolar Singapura | 110.921 | 105.179 | 5.742 | Singapore Dollar |
| Dolar Australia | 548.992 | 549.647 | 655 | Australian Dollar |
| Euro | 54.011 | 44.506 | 9.505 | Euro |
| Yuan China | 37.542 | 36.969 | 573 | China Yuan |
| Poundsterling Inggris | 3.381 | 1.027 | 2.354 | Great Britain Poundsterling |
| Dolar Hong Kong | 4.707 | - | 4.707 | Hong Kong Dollar |
| Riyal Saudi Arabian | 857 | - | 857 | Saudi Arabian Riyal |
| Dolar New Zealand | 3.548 | 1.026 | 2.522 | New Zealand Dollar |
| **Jumlah** | **7.962.659** | **7.977.809** | **80.546** | **Total** |

| | 2023 | | | |
|---|---|---|---|---|
| | Laporan Posisi Keuangan dan Rekening Administratif/ *Statements of Financial Position and Administrative Account* | | Bersih Absolut/ *Net Absolute* | |
| Mata Uang | Aset/ *Assets* | Liabilitas/ *Liabilities* | | Currencies |
| Dolar Amerika Serikat | 8.711.350 | 9.189.214 | 477.864 | United States Dollar |
| Yen Jepang | 10.305 | 6.598 | 3.707 | Japanese Yen |
| Dolar Singapura | 64.288 | 64.132 | 156 | Singapore Dollar |
| Dolar Australia | 77.037 | 74.868 | 2.169 | Australian Dollar |
| Euro | 61.678 | 43.684 | 17.994 | Euro |
| Yuan China | 44.600 | 41.685 | 2.915 | China Yuan |
| Poundsterling Inggris | 6.111 | 1.168 | 4.943 | Great Britain Poundsterling |
| Dolar Hong Kong | 1.924 | - | 1.924 | Hong Kong Dollar |
| Riyal Saudi Arabian | 1.071 | 869 | 202 | Saudi Arabian Riyal |
| Dolar New Zealand | 2.145 | 82 | 2.063 | New Zealand Dollar |
| **Jumlah** | **8.980.509** | **9.422.300** | **513.937** | **Total** |

Posisi devisa neto pada tanggal 31 Desember 2024 dan 2023 dihitung berdasarkan Peraturan Bank Indonesia. Rasio PDN konsolidasian pada tanggal 31 Desember 2024 dan 2023 yang dilaporkan pada Bank Indonesia masing-masing adalah sebesar 1,06% dan 6,57%.

Pengungkapan lebih lanjut pada Aset dan Liabilitas Mata Uang Asing diungkapkan pada Catatan 39.

Net open position as of December 31, 2024 and 2023 is computed in accordance with the Bank Indonesia Regulation. The consolidation NOP ratio's submitted by the Company to Bank Indonesia as of December 31, 2024 and 2023 are 1.06% and 6.57%, respectively.

The further disclosures on Monetary Assets and Liabilities Denominated in Foreign Currencies are presented in Note 39.

h. Aset lain-lain

Berikut adalah rincian agunan yang diambil alih dan properti terbengkalai berdasarkan kolektibilitasnya sesuai ketentuan Bank Indonesia:

h. Aset lain-lain

The classification of foreclosed assets and abandoned properties subject to Bank Indonesia regulation is as follows:

| | 2024 | 2023 | |
|---|---|---|---|
| Lancar | 1.112 | 1.481 | Current |
| Kurang lancar | 2.934 | 3.346 | Substandard |
| Diragukan | 25.479 | 41.068 | Doubtful |
| Macet | 86.888 | 79.726 | Loss |
| Jumlah | 116.413 | 125.621 | Total |

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai untuk aset lain-lain adalah cukup untuk menutup kemungkinan kerugian yang akan timbul akibat tidak tertagihnya aset tersebut.

Pengungkapan lebih lanjut pada Aset lain-lain diungkapkan pada Catatan 16.

Management believes that the allowance of impairment losses for other assets is adequate to cover possible losses that may arise from these assets.

The further disclosures on Other assets are presented in Note 16.

i. Tujuan dan Kebijakan Manajemen Risiko Keuangan

Profil Risiko

Dalam rangka pelaksanaan proses dan sistem Manajemen Risiko yang efektif, maka Perusahaan sebagaimana yang diamanatkan dalam Ketentuan Regulator mengenai Penerapan Manajemen Risiko Bank Umum telah membentuk Komite Manajemen Risiko dimana keanggotaan Komite Manajemen Risiko terdiri dari Mayoritas Direksi dan Pejabat Eksekutif Bank. Komite Manajemen Risiko dibentuk dengan tugas antara lain penyusunan kebijakan, strategis, dan pedoman penerapan Manajemen Risiko, serta perbaikan atau penyempurnaan pelaksanaan Manajemen Risiko berdasarkan hasil evaluasi pelaksanaan Manajemen Risiko.

Selanjutnya Perusahaan juga telah membentuk *Risk Management Group* (RMG) yang independen terhadap Satuan Kerja Operasional (*risk taking unit*) dan terhadap satuan kerja yang melaksanakan fungsi pengendalian intern, dan dalam pelaksanaan tugasnya bertanggung jawab langsung kepada Direktur Kepatuhan dan Manajemen Risiko. Pembentukan *Risk Management Group* telah disesuaikan dengan kebutuhan dan kompleksitas bisnis perusahaan. Adapun tugas dan tanggung jawab *Risk Management Group* (Satuan Kerja Manajemen Risiko) antara lain mencakup:

- Memberikan masukan kepada Direksi dalam penyusunan kebijakan, strategi, dan kerangka manajemen risiko;
- Menyusun dan mengembangkan prosedur dan alat untuk identifikasi, pengukuran, pemantauan, dan pengendalian risiko;
- Mendesain dan menerapkan perangkat yang dibutuhkan dalam melakukan identifikasi, pengukuran, pemantauan, dan pengendalian risiko serta sistem informasi;
- Memantau implementasi kebijakan, strategi, dan kerangka manajemen risiko yang direkomendasikan oleh Komite Manajemen Risiko dan yang telah disetujui oleh Direksi;

i. Financial Risk Management Objectives and Policies

Risk Profile

In order to implement an effective Risk Management process and system, the Company as mandated in the Regulatory Provisions concerning the Implementation of Commercial Bank Risk Management has established a Risk Management Committee where the membership of the Risk Management Committee consists of the majority of the Board of Directors and Bank Executive Officers. The Risk Management Committee was formed with the tasks of, among others, formulating policies, strategies, and guidelines for the implementation of Risk Management, as well as improving or perfecting the implementation of Risk Management based on the results of the evaluation of the implementation of Risk Management.

Furthermore, the Company has also established an independent Risk Management Group (RMG) that operates separately from the Operational Work Unit (risk-taking unit) and the work unit that carries out the internal control function, and in carrying out its duties is directly responsible to the Director of Compliance and Risk Management. The establishment of the Risk Management Group has been adjusted to the needs and complexity of the company's business. The duties and responsibilities of the Risk Management Group (Risk Management Work Unit) includes, among others:

- Provide input to the Board of Directors in the development of policies, strategies and risk management framework;
- Develop procedures and tools for the identification, measurement, monitoring, and controlling of risks;
- Design and implement the necessary tools to identify, measure, monitor, and control risks and information systems;
- Monitor the implementation of policies, strategies and risk management framework recommended by the Risk Management Committee and approved by the Board of Directors;

- Memantau posisi/eksposur risiko secara keseluruhan, maupun per risiko termasuk pemantauan kepatuhan terhadap toleransi risiko dan limit yang ditetapkan;

- Melakukan stress testing guna mengetahui dampak dari implementasi kebijakan dan strategi manajemen risiko terhadap portofolio atau kinerja Perusahaan secara keseluruhan;

- Mengkaji usulan aktivitas dan/atau produk baru yang dikembangkan oleh suatu unit tertentu Perusahaan. Pengkajian difokuskan terutama pada aspek kemampuan Perusahaan untuk mengelola aktivitas dan/atau produk baru termasuk kelengkapan sistem dan prosedur yang digunakan serta dampaknya terhadap eksposur risiko Perusahaan secara keseluruhan;

- Memberikan rekomendasi kepada satuan kerja bisnis dan/atau kepada Komite Manajemen Risiko terkait penerapan manajemen risiko antara lain mengenai besaran atau maksimum eksposur risiko yang dapat dipelihara Perusahaan;

- Mengevaluasi akurasi dan validitas data yang digunakan oleh Perusahaan untuk mengukur risiko bagi Perusahaan yang menggunakan model untuk keperluan internal;

- Menyusun dan menyampaikan laporan profil risiko kepada Direktur Utama, Direktur Manajemen Risiko, dan Komite Manajemen Risiko secara berkala atau paling kurang secara triwulanan. Frekuensi laporan harus ditingkatkan apabila kondisi pasar berubah dengan cepat;

- Melaksanakan kaji ulang secara berkala dengan frekuensi yang disesuaikan kebutuhan Perusahaan, untuk memastikan:
  1. Kecukupan kerangka manajemen risiko;
  2. Keakuratan metodologi penilaian risiko; dan
  3. Kecukupan sistem informasi manajemen risiko.

- Menyusun dan menyampaikan rencana dan realisasi rencana kerja Komite Manajemen Risiko Perusahaan sebagai panduan dalam menjalankan tugas dan tanggung jawab komite untuk disetujui oleh Direksi dan/atau Komite Manajemen Risiko;

- Monitor overall risk position/exposure, or one by one, including monitoring of compliance with risk tolerance and limits set;

- Conduct stress testing to determine the impact of the implementation of policies and strategies of risk management of the portfolio or overall performance of the Company;

- Evaluate the proposed activity and/or a new product developed by a particular unit of the Company. The assessment focused primarily on aspects of the Company's ability to manage activities and/or new product including the complete system and the procedures used and their impact on the overall risk exposure of the Company;

- Provide recommendations to the working unit of business and/or to the Risk Management Committee related to the implementation of risk management, regarding the amount or maximum risk exposure of the Company to be maintained;

- Evaluate the accuracy and validity of data used by the Company to measure risks for the Company that using models for internal purposes;

- Prepare and submit the risk profile report to the President Director, Director of Risk Management, and Risk Management Committee on a regular basis or at least on a quarterly basis. The frequency of reporting should be increased if market conditions change rapidly;

- Conduct periodic review with a frequency tailored to the needs of the Company's need to ensure:
  1. Adequacy of the risk management framework;
  2. The accuracy of the risk assessment methodology; and
  3. Adequacy of the risk management information system.

- Prepare and submit plans and realization of the Company's Risk Management Committee's work plan as a guide in carrying out the committee's duties and responsibilities to be approved by the Board of Directors and/or the Risk Management Committee;

- Menyusun dan menyampaikan Pedoman dan Tata Tertib Kerja Komite Manajemen Risiko Perusahaan dalam rangka penguatan penerapan tata kelola dan manajemen risiko dengan mengacu pada ketentuan Regulator dan ketentuan Internal mengenai Penerapan Tata Kelola dan Penerapan Manajemen Risiko untuk disetujui oleh Direksi dan/atau Komite Manajemen Risiko.

- Prepare and submit the Guidelines and Work Rules of the Company's Risk Management Committee in order to strengthen the implementation of governance and risk management by referring to the provisions of the Regulator and Internal provisions regarding the Implementation of Governance and the Implementation of Risk Management to be approved by the Board of Directors and/or the Risk Management Committee.

Risiko Kredit

Perusahaan secara berkesinambungan telah dan/atau akan melakukan perbaikan dan penyempurnaan dalam proses kredit antara lain:

Credit Risk

The Company has continuously and/or will make improvements in the credit process, including:

- Melakukan pemisahan *Risk Appetite & Risk Tolerance* Kredit dan Surat Berharga serta melakukan pemisahan parameter CKPN NPL terbagi kedalam CKPN NPL Perusahaan, CKPN NPL Kolektif dan CKPN NPL Individual dimana pemisahan ini menyesuaikan dengan penerapan CKPN mengacu pada PSAK 71 yang telah diimplementasikan oleh Perusahaan;

- Separating Loans and Securities Risk Appetite & Risk Tolerance and separating the parameter of Company's Allowance for Impairment Loss NPL, Collective Allowance for Impairment Loss NPL, and Individual Allowance for Impairment Loss NPL, where this separation is adjusted to application of Allowance for Impairment Loss referring to PSAK 71 that has been implemented by the Company;

- Menetapkan dan melakukan pemantauan *Risk Appetite* dan *Risk Tolerance* untuk rasio NPL Net dan Gross Bank, NPL per Segmentasi, Sektor Ekonomi Kredit & Surat Berharga, Debitur Inti, CKPN untuk NPL Perusahaan, CKPN NPL Kolektif, CKPN NPL Individual, Rasio Pembiayaan Inklusif Makroprudensial (RPIM);

- Establishing and monitoring Loans and Securities of Risk Appetite and Risk Tolerance for the Company's Net and Gross NPL ratios, NPL by Segmentation, Economic Sectors of Loans and Securities, Core Debtors, Company's Allowance for Impairment Loss for NPL, Collective Allowance for Impairment Loss NPL, and Individual Allowance for Impairment Loss NPL, Macroprudential Inclusive Financing Ratio (RPIM);

- Optimalisasi fungsi *Early Warning* oleh *Credit Management Group (Corporate & Commercial)* dan *Credit Management Group (MSME & Consumer)* untuk mendeteksi dini kinerja, prospek dan kemampuan membayar debitur untuk meminimalkan risiko gagal bayar dan/atau penurunan kolektibilitas yang berdampak pada penambahan pembentukan cadangan kerugian penurunan nilai (CKPN);

- Optimizing the Early Warning function by Credit Management Group (Corporate & Commercial) dan Credit Management Group (MSME & Consumer) to detect early performance, prospects and debtor's ability to pay in order to minimize the risk of default and/or decrease in collectibility which has an impact on the addition of allowance of impairment asset provision;

- Peningkatan fungsi *Credit Administration* and *Control (CAC)* dalam memastikan dan memperkuat fungsi *Monitoring* atas pemenuhan kepatuhan terhadap *covenant* dan kelengkapan dokumen;

- Improvement of the Credit Administration and Control (CAC) function in ensuring and strengthening the Monitoring function on fulfill compliance of covenant and document completeness;

- Menindaklanjuti Siaran Pers OJK No. SP-41/OJK/GKPB/III/2024 tentang Pengumuman Berakhirnya Stimulus Restrukturisasi Kredit Perbankan dalam Rangka Penanganan Pandemi Covid-19, antara lain dengan menetapkan Pengajuan restrukturisasi Covid-19 maksimal sampai dengan 31 Maret 2024 dengan jangka waktu fasilitas bagi Debitur yang terdampak Covid-19 dapat melebihi jangka waktu penetapan restrukturisasi di 31 Maret 2024. Perusahaan tetap dapat melanjutkan restrukturisasi kredit Covid-19 yang sudah berjalan, namun penilaian kualitas aset setelah melewati 31 Maret 2024 akan mengacu kepada POJK penilaian kualitas aset dan tidak diperkenankan untuk memberikan restrukturisasi Covid-19 kepada Debitur setelah 31 Maret 2024. Pengajuan restrukturisasi kredit baru dapat dilakukan dengan mengacu pada ketentuan normal yang berlaku yaitu mengikuti POJK No. 40/POJK.03/2019 tentang Penilaian Kualitas Aset Bank Umum;

- Following OJK's Press Release No SP-41/OJK/GKPB/III/2024 regarding the Announcement of the Termination of Banking Credit Restructuring Stimulus in the Context of Handling the Covid-19 Pandemic, it is determined that the submission of Covid-19 restructuring shall be allowed until March 31, 2024, with a facility period for debtors affected by Covid-19 that may exceed the restructuring deadline of March 31, 2024. Company may continue the ongoing COVID-19 credit restructuring, but the assessment of asset quality after March 31, 2024 will be based on the POJK asset quality assessment, and it will not be allowed to provide COVID-19 restructuring to debtors after March 31, 2024. New credit restructuring applications can be made in accordance with the applicable normal provisions, following POJK No 40/POJK03/2019 regarding the Assessment of General Banks' Asset Quality;

- Melakukan pengkinian kebijakan, *Standard of Procedure* (SOP), Surat Edaran (SE), Surat Keputusan (SK) untuk menyempurnakan proses kredit secara *end to end* disesuaikan dengan perubahan faktor atau stratejik bisnis, eksposur risiko, profil risiko dan ketentuan regulator yang berlaku;

- Updating policies, Standard of Procedure (SOP), circular letter a decision letter to improve the end-to-end credit process adjusted to changes in business factors or strategies, risk exposure, risk profile and applicable regulatory provisions;

- Memantau pemenuhan dokumen *covenant* kredit sesuai yang disyaratkan pada *Offering Letter* dan segera ditindaklanjuti apabila terdapat covenant yang tidak dapat dipenuhi dan memastikan mitigasi atas penyimpangan *covenant* telah memadai dan *prudent* guna meminimalisir risiko yang akan dihadapi oleh Grup;

- Monitor the fulfillment of credit covenant documents as required in the Offering Letter and immediately follow up if there are covenants that cannot be fulfilled and ensure that the mitigation of covenant deviations is adequate and prudent in order to minimize the risks that will be faced by the Group;

- Melakukan pengendalian risiko kredit dari masing-masing unit bisnis dalam hal penanganan kredit, memantau progress penyelesaian debitur bermasalah dan melakukan penagihan yang intensif, lelang/agunan yang diambil alih (AYDA), dan pemasaran jaminan melalui media digital dan non digital serta hapus buku;

- Managing credit risk control from each business unit in terms of handling credit, monitoring the progress of resolving problematic debtors, and conducting intensive collections, auctions/foreclosed assets (AYDA), and marketing of collateral through digital and non-digital media as well as write-offs;

- Melakukan *monitoring* ketepatan pembayaran dan *flowrate* untuk nasabah seluruh segmen, keberlanjutan terhadap kinerja usaha & kemampuan bayar debitur *existing*. Melakukan restrukturisasi kepada debitur-debitur yang mengalami penurunan usaha dengan tetap memperhatikan ketentuan baik dari karakter debitur, usaha yang masih berjalan sebagai sumber pembayaran, prospek usaha, dan masih memiliki kemampuan membayar;

- Conducting monitoring of payment accuracy and flow rate for customers across all segments, ensuring sustainability of business performance and the repayment capacity of existing debtors. Implementing restructure for debtors who experiencing a decline in business while still considering the provisions regarding debtor character, the business that is still operating as a source of payment, business prospects, and has ability to pay;

- Mengupayakan penyaluran kredit ke sektor yang tergolong *sustainable financing* dengan tetap memperhatikan kondisi ekonomi dan *risk appetite* Grup;

- Striving to credit distributions to sectors that are considered sustainable financing while still paying attention to the economic conditions and the Group's risk appetite;

- Pelaksanaan *corporate credit quality assurance* dalam rangka menjaga ketertiban dokumentasi kredit, kedisiplinan pemantauan kredit, pemenuhan *covenant* dan persyaratan kredit serta pemantauan kualitas portofolio kredit yang bertujuan untuk mendorong terciptanya proses pemberian kredit yang berkualitas dan terpantau dengan baik;

- The implementation of corporate credit quality assurance in order to maintain the order of credit documentation, discipline in credit monitoring, fulfillment of covenants and credit requirements, as well as monitoring the quality of the credit portfolio aimed at promoting the creation of a quality and well-monitored credit granting process;

- *Monitoring* portfolio kredit secara harian, melakukan pemeriksaan terkait dokumen debitur, dan melakukan *monitoring* proses penanganan dan penagihan, meningkatkan kualitas calon debitur dengan menggunakan data pihak ketiga sebagai data pembanding dalam pengambilan keputusan kredit;

- Daily monitoring of the credit portfolio, checking debtor documents, and monitoring the handling and collection process, improving the quality of potential debtors by using third-party data as a comparison in credit decision-making;

- Secara bertahap melakukan pengurangan eksposur konsentrasi kredit kepada debitur inti guna memenuhi *Risk Appetite* dan *Risk Tolerance* yang sudah ditentukan oleh Perusahaan;

- Gradually reduce exposure to credit concentration to core debtors in order to meet the Risk Appetite and Risk Tolerance that have been determined by the Company;

- Pembentukan CKPN secara bulanan berdasarkan metode PSAK No. 109 dan secara bertahap melakukan penambahan pembentukan CKPN agar memadai sesuai dengan *Risk Appetite* dan *Risk Tolerance* Perusahaan agar siap menghadapi kemungkinan risiko kredit yang akan terjadi;

- Provision of allowance of impairment losses on a monthly basis based on SFAS No. 109 Method and gradually adding allowance of impairment asset provision in order to adequately follow with the Company's Risk Appetite and Risk Tolerance so that it is ready to face possible credit risks that will occur;

- Melakukan stress testing guna mengetahui dampak penurunan kolekbilitas debitur bermasalah terhadap NPL, penambahan pembentukan CKPN, modal dan CAR Perusahaan;

- Melakukan penyusunan profil risiko Perusahaan yang dilaporkan secara triwulanan dan semesteran. Laporan profil risiko ini menggambarkan risiko yang melekat dalam kegiatan bisnis bank *(inherent risk)* termasuk kualitas penerapan manajemen risiko untuk masing-masing jenis risiko; dan

- Melakukan pelaporan dan pemantauan penyediaan dana dan BMPK baik kepada pihak terkait maupun kepada selain pihak terkait setiap bulan.

Risiko Likuiditas

Rasio likuiditas yaitu *Liquidity Coverage Rasio (*LCR*)* dan *Net Stable Funding Rasio (*NSFR*)* pada bulan Desember 2024 masing-masing sebesar 281,3% dan 190,7% untuk individual dan sebesar 301,81% dan 195,2% untuk konsolidasi dengan perusahaan anak, kedua rasio likuiditas ini baik secara individu maupun secara konsolidasi dengan perusahaan anak telah memenuhi ketentuan regulator yaitu minimal sebesar 100%. Dengan tingginya rasio LCR dan NSFR Grup maka tingkat risiko likuiditas Grup dinilai rendah dan tercermin bahwa Grup memiliki aset berkualitas tinggi yang sangat mencukupi untuk memenuhi kewajiban Grup.

- Perform stress testing to determine the impact of reducing the collectibility of troubled debtors on NPL, increasing the provision of allowance of impairment asset, capital and CAR of the Company;

- Perform the preparation of the Company's risk profile which is reported quarterly and semi-annually. This risk profile report describes the risks inherent in bank business activities (inherent risk) including the quality of risk management implementation for each type of risk; and

- Reporting and monitoring the provision of funds and LLL to both relevant parties and non-relevant parties every month.

Liquidity Risk

The liquidity ratios, namely the Liquidity Coverage Ratio (LCR) and the Net Stable Funding Ratio (NSFR), in December 2024 were 281.3% and 190.7% respectively for individual entities, and 301.81% and 195.2% for consolidated entities with subsidiaries. Both liquidity ratios, whether individually or consolidated with subsidiaries, have met the regulatory requirements, which is a minimum of 100%. With the high LCR and NSFR ratios, the Group's liquidity risk is assessed as low, reflecting that the Group possesses high-quality assets that are more than sufficient to meet its obligations.

**Lampiran 1** **Attachment 1**

**PT BANK SINARMAS TBK**
**(ENTITAS INDUK)**
**Laporan Posisi Keuangan**
**tanggal 31 Desember 2024 dan 2023**
**(Angka-angka disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)**

**PT BANK SINARMAS TBK**
**(PARENT)**
**Statement of Financial Position**
**as at December 31, 2024 and 2023**
**(Figures are presented in millions of Rupiah, unless otherwise stated)**

| | 2024 | 2023 | |
|---|---|---|---|
| **ASET** | | | **ASSETS** |
| Kas dan setara kas | 469.088 | 388.102 | Cash and cash equivalent |
| Giro pada Bank Indonesia | 4.694.101 | 6.022.812 | Demand deposits with Bank Indonesia |
| Giro pada bank lain - pihak ketiga | 1.900.099 | 2.656.867 | Demand deposits with other banks - third parties |
| Cadangan kerugian penurunan nilai | (565) | (932) | Allowance for impairment losses |
| Jumlah - bersih | 1.899.534 | 2.655.935 | Net |
| Penempatan pada Bank Indonesia dan bank lain | 8.282.115 | 6.263.389 | Placements with Bank Indonesia and other banks |
| Cadangan kerugian penurunan nilai | (139) | (12) | Allowance for impairment losses |
| Jumlah - bersih | 8.281.976 | 6.263.377 | Net |
| Efek-efek | 17.246.193 | 18.132.071 | Securities |
| Cadangan kerugian penurunan nilai | (245) | (269) | Allowance for impairment losses |
| Jumlah - bersih | 17.245.948 | 18.131.802 | Net |
| Efek-efek yang dibeli dengan janji jual kembali | 193.748 | | Securities purchased under agreements to resell |
| Bunga diterima dimuka yang belum diamortisasi | (1.533) | - | Unamortized interest received |
| Jumlah - bersih | 192.215 | - | Net |
| Kredit yang diberikan dan piutang/ pembiayaan syariah | 11.181.724 | 16.871.446 | Loans and receivables/sharia financing |
| Cadangan kerugian penurunan nilai | (774.038) | (1.686.246) | Allowance for impairment losses |
| Jumlah - bersih | 10.407.686 | 15.185.200 | Net |
| Tagihan akseptasi - pihak ketiga | 38.144 | 79.864 | Acceptances receivable - third parties |
| Cadangan kerugian penurunan nilai | (15) | (1.560) | Allowance for impairment losses |
| Jumlah - bersih | 38.129 | 78.304 | Net |
| Penyertaan saham | 659.290 | - | Investments in shares |
| Pendapatan yang masih akan diterima | 272.974 | 326.751 | Accrued income |
| Biaya dibayar dimuka | 551.152 | 921.948 | Prepaid expenses |
| Aset tetap dan aset hak guna - setelah dikurangi akumulasi penyusutan sebesar Rp1.793.837 dan Rp1.631.510 masing-masing pada tanggal 31 Desember 2024 dan 2023 | 1.493.793 | 1.606.075 | Property and equipment - net of accumulated depreciation of Rp1,793,837 and Rp1,631,510 as at December 31, 2024 and 2023, respectively |
| Aset Ijarah - setelah dikurangi akumulasi penyusutan sebesar Rp119.251, pada tanggal 31 Desember 2023 | - | 384.218 | Ijarah assets - net of accumulated depreciation of Rp119,251 as at December 31, 2023 |
| Aset pajak tangguhan - bersih | 87.680 | 214.568 | Deferred tax assets - net |
| Aset lain-lain - bersih | 314.688 | 455.904 | Other assets - net |
| **JUMLAH ASET** | **46.608.254** | **52.634.996** | **TOTAL ASSETS** |

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| | 2024 | 2023 | |
|---|---|---|---|
| **LIABILITAS, DANA SYIRKAH TEMPORER DAN EKUITAS** | | | **LIABILITIES, TEMPORARY SYIRKAH FUNDS AND EQUITY** |
| **Liabilitas** | | | **Liabilities** |
| Liabilitas segera | 154.187 | 165.101 | Liabilities immediately payable |
| Simpanan | 36.534.618 | 35.142.585 | Deposits |
| Simpanan dari bank lain | 80.995 | 327.445 | Deposits from other banks |
| Efek-efek yang dijual dengan janji beli kembali - pihak ketiga | 879.455 | 1.051.717 | Securities sold under agreements to repurchase - third parties |
| Utang pajak | 38.704 | 52.572 | Taxes payable |
| Liabilitas akseptasi | 38.160 | 79.880 | Acceptances payable |
| Beban yang masih harus dibayar | 33.706 | 43.816 | Accrued expenses |
| Liabilitas imbalan kerja jangka panjang | 37.340 | 35.426 | Long-term employee benefits liability |
| Obligasi subordinasi - bersih | 497.505 | 496.512 | Subordinated bonds - net |
| Liabilitas lain-lain | 361.476 | 393.854 | Other liabilities |
| **Jumlah Liabilitas** | **38.656.146** | **37.788.908** | **Total Liabilities** |
| **Dana Syirkah Temporer** | | | **Temporary Syirkah Funds** |
| Simpanan | - | 7.003.551 | Deposits |
| Simpanan dari bank lain | | | Deposits from other banks |
| Pihak ketiga | - | 15.769 | Third parties |
| **Jumlah Dana Syirkah Temporer** | **-** | **7.019.320** | **Total Temporary Syirkah Funds** |
| **Ekuitas** | | | **Equity** |
| Modal saham - nilai nominal Rp 100 (dalam Rupiah penuh) per saham<br>Modal dasar - 60.000.000.000 saham<br>Modal ditempatkan dan disetor - 19.716.162.403 saham dan 19.716.162.403 saham masing-masing pada tanggal 31 Desember 2024 dan 2023 | 1.971.616 | 1.971.616 | Capital stock - Rp 100 (in full Rupiah) par value per share<br>Authorized - 60,000,000,000 shares<br>Issued and paid-up shares 19,716,162,403 and 19,716,162,403 shares as of December 31, 2024 and 2023, respectively |
| Tambahan modal disetor - bersih | 3.552.194 | 3.552.194 | Additional paid-in capital - net |
| Komponen ekuitas lainnya | 502.000 | 588.242 | Other equity components |
| Saldo laba | | | Retained earnings |
| Ditentukan penggunaannya | 10.000 | 9.500 | Appropriated |
| Tidak ditentukan penggunaannya | 1.916.298 | 1.705.216 | Unappropriated |
| | 1.926.298 | 1.714.716 | |
| **Jumlah Ekuitas** | **7.952.108** | **7.826.768** | **Total Equity** |
| **JUMLAH LIABILITAS, DANA SYIRKAH TEMPORER DAN EKUITAS** | **46.608.254** | **52.634.996** | **TOTAL LIABILITIES, TEMPORARY SYIRKAH FUNDS AND EQUITY** |

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**Lampiran 2** **Attachment 2**

**PT BANK SINARMAS TBK**
**(ENTITAS INDUK)**
**Laporan Laba Rugi**
**dan Penghasilan Komprehensif**
**Untuk Tahun-Tahun yang Berakhir**
**31 Desember 2024 dan 2023**
**(Angka-angka disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)**

**PT BANK SINARMAS TBK**
**(PARENT)**
**Statement of Profit or Loss**
**and Comprehensive Income**
**For the Years Ended**
**December 31, 2024 and 2023**
**(Figures are presented in millions of Rupiah, unless otherwise stated)**

| | 2024 | 2023 | |
|---|---|---|---|
| **PENDAPATAN DAN BEBAN OPERASIONAL** | | | **OPERATING REVENUES AND EXPENSES** |
| Pendapatan bunga | 3.018.913 | 2.781.795 | Interest revenues |
| Pendapatan syariah | - | 734.016 | Sharia income |
| Beban bunga | (829.608) | (632.923) | Interest expense |
| Beban syariah | - | (259.569) | Sharia expenses |
| Pendapatan Bunga dan Bagi Hasil - Bersih | 2.189.305 | 2.623.319 | Interest Revenues and Profit Sharing Income - Net |
| Pendapatan Operasional Lainnya | | | Other Operating Revenues |
| Provisi dan komisi selain dari kredit | 434.165 | 425.536 | Fees and commissions other than from loans |
| Keuntungan kurs mata uang asing - bersih | 103.446 | 76.312 | Gain on foreign exchange - net |
| Keuntungan dari kenaikan nilai wajar efek-efek yang diukur melalui laba rugi - bersih | 5.052 | 67.541 | Gain on increase in fair value of securities at fair value through profit and loss - net |
| Keuntungan dari penjualan efek-efek yang diukur melalui laba rugi - bersih | 146.827 | - | Gain on sale of fair value of securities at fair value through profit and loss - net |
| Penerimaan kembali aset yang telah dihapusbukukan | 177.832 | 123.196 | Recovery of written-off assets |
| Lain-lain | 28.830 | 233.480 | Others |
| Jumlah Pendapatan Operasional | 3.085.457 | 3.549.384 | Total Operating Revenues |
| Beban Operasional Lainnya | | | Other Operating Expenses |
| Kerugian penurunan nilai aset keuangan | 61.070 | 895.494 | Impairment losses on financial assets |
| Umum dan administrasi | 1.328.509 | 1.196.199 | General and administrative expenses |
| Tenaga kerja | 1.102.573 | 1.018.965 | Personnel expenses |
| Penyusutan aset tetap dan aset hak guna | 283.244 | 267.244 | Depreciation - property and equipment and right of use assets |
| Biaya komisi | 39.760 | 33.303 | Commission expense |
| Kerugian dari penjualan efek-efek yang diukur melalui laba rugi - bersih | - | 7.725 | Loss on sale of fair value of securities at fair value through profit and loss - net |
| Lain-lain | 10.645 | 56.876 | Others |
| Jumlah Beban Operasional | 2.825.801 | 3.475.806 | Total Operating Expenses |
| **LABA SEBELUM PAJAK** | 259.656 | 73.578 | **PROFIT BEFORE TAX** |
| **BEBAN PAJAK** | | | **TAX EXPENSE** |
| Kini | 51.896 | 78.960 | Current |
| Tangguhan | (557) | (1.904) | Deferred |
| Penyesuaian tahun lalu | - | (79.274) | Previous year adjustment |
| | 51.339 | (2.218) | |
| **LABA BERSIH** | 208.317 | 75.796 | **PROFIT FOR THE YEAR** |
| **PENGHASILAN (RUGI) KOMPREHENSIF LAIN** | | | **OTHER COMPREHENSIVE INCOME (LOSS)** |
| Pos yang akan direklasifikasi ke laba rugi | | | Item that will be reclassified subsequently to profit or loss |
| Penghasilan (rugi) yang belum direalisasi atas perubahan nilai wajar dari efek-efek yang diukur melalui penghasilan komprehensif lain | (107.352) | 368.028 | Unrealized gain (loss) on change in fair value of securities at fair value through other comprehensive income |
| Pajak sehubungan dengan pos yang akan direklasifikasi | 21.110 | 15.211 | Tax relating to items that will be reclassified |
| | (86.242) | 383.239 | |
| Pos yang tidak akan direklasifikasi ke laba rugi - bersih setelah dampak pajak tangguhan | | | Items that will not be reclassified to profit or loss |
| Revaluasi aset tetap | - | 86.375 | Gain on revaluation of property and equipment |
| Pengukuran kembali liabilitas imbalan kerja jangka panjang | (3.865) | (4.217) | Remeasurement of long-term employee benefits liability |
| Pajak sehubungan dengan pos yang tidak akan direklasifikasi | 735 | 567 | Tax relating to items that will not be reclassified |
| | (3.130) | 82.725 | |
| **JUMLAH (RUGI) LABA KOMPREHENSIF LAIN** | (89.372) | 465.964 | **TOTAL OTHER COMPREHENSIVE (LOSS) INCOME** |
| **JUMLAH LABA KOMPREHENSIF** | 118.945 | 541.760 | **TOTAL COMPREHENSIVE INCOME** |
| **LABA BERSIH PER SAHAM (dalam Rupiah penuh)** | | | **EARNINGS PER SHARE (in full Rupiah)** |
| Dasar | 10,57 | 3,84 | Basic |

| | Catatan/ *Notes* | Modal Saham/ *Capital Stock* | Tambahan Modal Disetor - Bersih/ *Addition Paid in Capital* | Komponen Ekuitas Lainnya/*Other Equity Components*: Laba (Rugi) yang Belum Direalisasi atas Perubahan Nilai Wajar Efek/ *Unrealized Gain (Loss) on Change in Fair Value of Securities* | Komponen Ekuitas Lainnya/*Other Equity Components*: Surplus Revaluasi Aset Tetap/ *Revaluation Surplus of Property and Equipment* | Saldo Laba/*Retained Earnigs*: Ditentukan Penggunaanya/ *Appropriated* | Saldo Laba/*Retained Earnigs*: Tidak Ditentukan Penggunaanya/ *Unappropriated* | Jumlah Ekuitas/ *Total Equity* |
|---|---|---|---|---|---|---|---|---|
| Saldo pada tanggal 1 Januari 2023/ *Balance as of January 1, 2023* | | 1.971.616 | 3.552.194 | (275.115) | 393.743 | 9.000 | 1.633.570 | 7.285.008 |
| Pembentukan cadangan umum/ *Appropriation for general reserve* | 42 | - | - | - | - | 500 | (500) | - |
| Laba tahun berjalan/ *Profit for the year* | | - | - | - | - | - | 75.796 | 75.796 |
| Penghasilan (rugi) komprehensif lain/ *Other comprehensive income (loss)* | | | | | | | | |
| Rugi yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain - bersih/ *Unrealized loss on change in fair value of securities measured at fair value through other comprehensive income - net* | 7,35 | - | - | 383.239 | - | - | - | 383.239 |
| Pengukuran kembali liabilitas imbalan kerja jangka panjang - bersih/ *Remeasurement of long - term employee benefits liability - net* | 35,41 | - | - | - | - | - | (3.650) | (3.650) |
| Surplus revaluasi aset tetap/ *Revaluation surplus of property & equipment* | 13 | - | - | - | 86.375 | - | - | 86.375 |
| Saldo pada tanggal 31 Desember 2023/ *Balance as of December 31, 2023* | | 1.971.616 | 3.552.194 | 108.124 | 480.118 | 9.500 | 1.705.216 | 7.826.768 |

| | Catatan/ *Notes* | Modal Saham/ *Capital Stock* | Tambahan Modal Disetor - Bersih/ *Addition Paid in Capital* | Komponen Ekuitas Lainnya/*Other Equity Components*: Laba (Rugi) yang Belum Direalisasi atas Perubahan Nilai Wajar Efek/ *Unrealized Gain (Loss) on Change in Fair Value of Securities* | Komponen Ekuitas Lainnya/*Other Equity Components*: Surplus Revaluasi Aset Tetap/ *Revaluation Surplus of Property and Equipment* | Saldo Laba/*Retained Earnigs*: Ditentukan Penggunaanya/ *Appropriated* | Saldo Laba/*Retained Earnigs*: Tidak Ditentukan Penggunaanya/ *Unappropriated* | Jumlah Ekuitas/ *Total Equity* |
|---|---|---|---|---|---|---|---|---|
| Saldo pada tanggal 1 Januari 2024/ *Balance as of January 1, 2024* | | 1.971.616 | 3.552.194 | 108.124 | 480.118 | 9.500 | 1.705.216 | 7.826.768 |
| Pembentukan cadangan umum/ *Appropriation for general reserve* | 42 | - | - | - | - | 500 | (500) | - |
| Laba tahun berjalan/ *Profit for the year* | | - | - | - | - | - | 208.317 | 208.317 |
| Penghasilan (rugi) komprehensif lain/ *Other comprehensive income (loss)* | | | | | | | | |
| Rugi yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain - bersih/ *Unrealized loss on change in fair value of securities measured at fair value through other comprehensive income - net* | 7,35 | - | - | (86.242) | - | - | - | (86.242) |
| Pengukuran kembali liabilitas imbalan kerja jangka panjang/ *Remeasurement of long - term employee benefits liability - net* | 35,41 | - | - | - | - | - | (3.130) | (3.130) |
| Efek pemisahan Unit Usaha Syariah/ *Effect of Spin-off Sharia Unit* | 26 | - | - | - | - | - | 6.395 | 6.395 |
| Saldo pada tanggal 31 Desember 2024/ *Balance as of December 31, 2024* | | 1.971.616 | 3.552.194 | 21.882 | 480.118 | 10.000 | 1.916.298 | 7.952.108 |

**PT BANK SINARMAS TBK**
**(ENTITAS INDUK)**
**Laporan Arus Kas**
**Untuk Tahun-Tahun yang Berakhir**
**31 Desember 2024 dan 2023**
**(Angka-angka disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)**

**PT BANK SINARMAS TBK**
**(PARENT)**
**Statement of Cash Flow**
**For the Years Ended**
**December 31, 2024 and 2023**
**(Figures are presented in millions of Rupiah, unless otherwise stated)**

| | 2024 | 2023 | |
|---|---|---|---|
| **ARUS KAS DARI AKTIVITAS OPERASI** | | | **CASH FLOWS FROM OPERATING ACTIVITIES** |
| Pendapatan bunga | 3.072.690 | 2.766.341 | Interest revenues |
| Pendapatan syariah | - | 825.965 | Sharia income |
| Pendapatan operasional lainnya | 676.486 | 658.322 | Other operating income |
| Beban bunga | (838.725) | (622.726) | Interest expenses |
| Beban syariah | - | (254.037) | Sharia expenses |
| Kerugian selisih kurs mata uang asing - bersih | (138.561) | 228.376 | Loss on foreign exchange - net |
| Pembayaran pajak penghasilan badan | (69.116) | (189.791) | Payment of corporate income tax |
| Beban umum dan administrasi | (1.322.350) | (1.199.899) | General and administrative expenses |
| Beban tenaga kerja | (1.102.573) | (1.018.965) | Salaries expense |
| Beban operasional lainnya | (48.289) | (248.442) | Other operational expenses |
| Arus kas operasional sebelum perubahan aset dan liabilitas operasi | 229.562 | 945.144 | Operating cash flow before changes in operating assets and liabilities |
| Penurunan (kenaikan) aset operasi: | | | Decrease (increase) in operating assets : |
| Efek-efek | 780.109 | 943.036 | Securities |
| Efek yang dibeli dengan janji dijual kembali | (192.215) | - | Securities purchased under agreements to resell |
| Kredit yang diberikan | 4.895.072 | (508.345) | Loans |
| Pembiayaan syariah | - | (2.000.631) | Sharia financing |
| Pembayaran tagihan akseptasi | 41.720 | (1.882) | Payment of acceptance receivables |
| Biaya dibayar dimuka | 370.796 | 357.505 | Prepaid expenses |
| Aset ijarah | - | (85.805) | Ijarah assets |
| Aset lain-lain | 26.752 | 25.120 | Other assets |
| Kenaikan (penurunan) liabilitas operasi: | | | Increase (decrease) in operating liabilities : |
| Liabilitas segera | (10.914) | 36.037 | Liabilities immediately payable |
| Simpanan | 1.940.123 | 2.745.559 | Deposits |
| Simpanan dari bank lain | (246.450) | 313.296 | Deposits from other banks |
| Utang pajak | 3.352 | 4.557 | Taxes payable |
| Efek yang dijual dengan janji beli kembali | (172.262) | 1.051.717 | Securities sold under agrements to repurchase |
| Liabilitas akseptasi | (41.720) | 1.815 | Acceptances payables |
| Liabilitas lain-lain | 84.362 | 300.664 | Other liabilities |
| Kenaikan (penurunan) dana syirkah temporer: | | | Increase (decrease) in syirkah temporary funds: |
| Simpanan | (7.019.320) | 686.542 | Deposits |
| Simpanan dari bank lain | - | (185.634) | Deposits from other banks |
| Kas Bersih Diperoleh dari (Digunakan untuk) Aktivitas Operasi | 688.967 | 4.628.695 | Net Cash Provided by (Used for) Operating Activities |
| **ARUS KAS DARI AKTIVITAS INVESTASI** | | | **CASH FLOWS FROM INVESTING ACTIVITIES** |
| Penyertaan modal pada entitas anak | (659.290) | - | Investment in subsidiaries |
| Hasil penjualan aset tetap | 767 | 824 | Proceeds from sale of property and equipment |
| Perolehan aset tetap | (140.292) | (189.091) | Acquisitions of property and equipment |
| Kas Bersih Digunakan untuk Aktivitas Investasi | (798.815) | (188.267) | Net Cash Used in Investing Activities |
| **ARUS KAS DARI AKTIVITAS PENDANAAN** | | | **CASH FLOWS FROM FINANCING ACTIVITIES** |
| Penerimaan (pembayaran) liabilitas sewa | (117.903) | (111.120) | Receipts (payment) from lease liabilities |
| Kas Bersih Diperoleh dari (Digunakan untuk) Aktivitas Pendanaan | (117.903) | (111.120) | Net Cash Provided by (Used for) Financing Activities |
| **KENAIKAN (PENURUNAN) BERSIH KAS DAN SETARA KAS** | (227.751) | 4.329.308 | **NET INCREASE (DECREASE) IN CASH AND CASH EQUIVALENTS** |
| **KAS DAN SETARA KAS AWAL TAHUN** | 15.331.170 | 11.042.096 | **CASH AND CASH EQUIVALENTS AT THE BEGINNING OF THE YEAR** |
| Pengaruh perubahan kurs mata uang asing | 241.984 | (40.234) | Effect on foreign exchange rate changes |
| **KAS DAN SETARA KAS AKHIR TAHUN** | 15.345.403 | 15.331.170 | **CASH AND CASH EQUIVALENTS AT END OF THE YEAR** |
| **PENGUNGKAPAN TAMBAHAN** | | | **SUPPLEMENTAL DISCLOSURES** |
| Kas dan Setara Kas terdiri dari: | | | Cash and Cash Equivalents Consist of : |
| Kas | 469.088 | 388.102 | Cash |
| Giro pada Bank Indonesia | 4.694.101 | 6.022.812 | Demand deposits with Bank Indonesia |
| Giro pada bank lain | 1.900.099 | 2.656.867 | Demand deposits with other banks |
| Penempatan pada Bank Indonesia dan bank lain - jangka waktu jatuh tempo tiga bulan atau kurang sejak tanggal perolehan | 8.282.115 | 6.263.389 | Placements with Bank Indonesia and other bank - original maturities of three months or less from the acquisition date |
| Jumlah Kas dan Setara Kas | 15.345.403 | 15.331.170 | Total Cash and Cash Equivalents |

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**PT. Bank Sinarmas Tbk.**

Sinar Mas Land Plaza
Jl. M.H Thamrin kav 51,
Menara 1, Lantai 1 & 2,
Jakarta 10350 - Indonesia
www.banksinarmas.com

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